

Draft Greater Sydney Region Plan

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SYDNEY COASTAL COUNCILS GROUP INC.

Councils caring for the coastal and estuarine environment

SUBMISSION

Draft Greater Sydney Region Plan

*Our Greater Sydney 2056
A metropolis of three cities
– connecting people*

To: The Greater Sydney Commission

Prepared by: Sydney Coastal Councils Group Incorporated (SCCG)

Date: 15 December 2017

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Submission on draft Greater Sydney Region Plan

1. INTRODUCTION

Established in 1989, the Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils comprising eleven-member councils, with twenty-seven years' experience in leading sustainable coastal management.

The Sydney Coastal Councils Group Strategic Plan 2015 – 2019 sets out three guiding principles which encapsulate the core vision, mission and goals of the SCCG, namely to:

1. Restore, protect and enhance the coastal environment, its associated ecosystems, ecological and physical processes and biodiversity.
2. Facilitate the sustainable use of coastal resources, now and in the future.
3. Promote adaptive, integrated and participatory management of the coast.

SCCG is a strong advocate for working collaboratively and transparently, with all levels of government, regional bodies, industry and the community. As managers and planners of the coastal zone, our Member Councils share an interest in the development and implementation of a comprehensive regional plan for Greater Sydney.

Key Recommendation Actions:

1. Explicitly recognise that Ecologically Sustainable Development (ESD) is at the heart of the draft Greater Sydney Region Plan and District Plans;
2. Set up a sufficiently resourced *Monitoring, Reporting and Evaluation Unit* within the Greater Sydney Commission (GSC);
3. Develop a new *Monitoring, Reporting and Evaluation Framework* document (for region and district plans);
4. Identify appropriate coasts and waterways as *Collaboration Areas*;
5. Provision of a statement clarifying how the detail of the former Implementation Plans will be carried forward.

District Plans

- Reduce unnecessary repetition (between Strategies in the draft Greater Sydney Region Plan and Actions in draft District Plans) and develop new Actions from supporting text under each Planning Priority.

1.1 PREVIOUS CONSULTATION AND SUBMISSION:

The SCCG made a detailed submission on the previous versions of the draft Greater Sydney Region Plan (GSRP) and the District Plans (dated *March 2017*). Below is a table of the key recommendations of the previous [submission](#), and a summary of how these recommendations have been addressed in the draft GSRP and draft District Plans:

Table 1 Key points from previous submission and comments on how these were addressed (as issues identified and listed in the *Submissions Response Report*).

ISSUE	COMMENT
1. A publicly available report addressing all submissions is produced.	Yes
2. A clear, scalable program (or intervention) logic is developed for all plans. Links between plans, priorities, strategies, actions etc.	No. Clarity and linkages between layers of reports, plans and strategies etc is an ongoing issue
3. The Implementation Plans (if they are to be carried forward in their current form) be the subject of further detailed consultation.	Partly – Issue 2
4. Outputs from <i>Environment Panel Advisory Paper for the Greater Sydney Commission</i> (November 2016) are progressed and metrics included in both District Plans and Implementation Plans.	Partly – limited metrics, high level indicators preferred
5. Reconsideration be given to using catchment or natural system boundaries to address cross-boundary governance issues.	Partly – Issue 10. Coasts and Harbour identified as major landscape
6. Marine Spatial Planning is promoted at a Regional and District scale.	No.
7. Provisions is made for the management of all hazards (natural and unnatural) in the DPs.	Partly – Issue 11 – Objective 37
8. Opportunities to expand the current development contributions system to deliver wider community and environmental benefits be explored.	Yes – Issue 3
9. Greater emphasis be placed on delivering the blue-green grid .	Partly - Issue 9
10. The principles of Water Sensitive Urban Design (WSUD) be integrated into all aspects of the DPs and that Greater Sydney adopt 'Water Sensitive City' principles.	Partly – Issue 11
11. Specific focus on ESD	No.

2. KEY ISSUES

The SCCG's primary focus for this submission is the green 'sustainability' theme and the open space elements of the draft GSRP. The following key issues are highlighted for the attention of the Greater Sydney Commission (GSC):

KEY ISSUE 1 – Misrepresentation of Ecologically Sustainable Development:

- The SCCG’s previous submission requesting, and arguing for, the continuation of *ecologically sustainable development* (ESD) to be at the heart of this planning initiative, like it remains the heart of other planning and environmental legislation (including the *Greater Sydney Commission Act 2015*) – has not been picked up. Figure 1 below shows how sustainability is one of five key themes to be balanced against each other. This diagram portrays a fundamental misrepresentation of ESD. Moving ESD to the heart of the diagram would accurately reflect the legislated requirements of current planning and environmental law in NSW. The current theme of ‘sustainability’ is more accurately reflected by the wording of s.9(f) of the *Greater Sydney Commission Act 2015* which refers to ‘environmental quality’. Continuing to use the concept of sustainability in a manner that portrays it as one among five competing themes is both inaccurate and disingenuous.
- Furthermore, the draft GSRP is not proactive enough in the way it seeks to ensure green, ‘sustainability’ objectives are met. For instance, many of the Council snapshot documents that seek to summarise key points for each LGA neglect to highlight actions to do with sustainability e.g. Randwick, Waverley (Planning Priority E14-20), Northern Beaches Council (N15-22), and Sutherland Shire Council (S13-18). This has the effect of de-emphasising the fundamental importance of *ecologically sustainable development* and has the appearance of pushing environmental objectives into the background to resume their current status as natural assets we hope ‘not to lose’; as opposed to natural assets we will proactively manage to support a sustainable Sydney, a liveable Sydney, and a productive Sydney.

Recommended Action 1: Explicitly recognise that ESD is at the heart of the draft GSRP and District Plans and redraw Figure 1 below (and supporting text) to reflect this.



Figure 1. Key themes of liveability, productivity, sustainability + collaboration and infrastructure. Source: p14 of draft GSRP Overview (p8 of the draft GSRP).

KEY ISSUE 2 –Monitoring, Reporting and Evaluation:

- It is noted that the GSC submits Annual Reports to the NSW Government (s.21 of the *Greater Sydney Commission Act 2015*) and that the intention of the online 'data hub' is to provide transparent, up-to-date reporting on key indicators of progress. This is set out on p.164-165 of the draft GSRP under Objective 40 (*Plans refined by monitoring and reporting*). Importantly, the same metrics are proposed to be measured to evaluate the effectiveness of all draft District Plans.
- As the various iterations of plans have been refined over the years, one key issue has remained – that of evaluating progress and success. While the draft GSRP highlights some of the strengths of, and continuities between, various plan iterations - the way we monitor, report on and evaluate the success of our policies needs strengthening. In the environmental field, observations form the basis of scientific progress. In the policy field, governments and agencies are seeking evidence-based policy more often. These two paradigms need to be merged together more consistently, and the GSC provides a unique governance opportunity to coordinate existing efforts and promote new initiatives.
- Multiple State agencies currently collect data that would be of use to monitoring progress of the implementation of the draft GSRP and draft District Plans. For example, data is collected by the Department of Planning and Environment through their state significant approval compliance monitoring function that sits outside Council monitoring functions. Similarly, water and environmental agencies possess data that would benefit implementation of the draft GSRP by being brought in and coordinated under the umbrella of the GSC. The GSC should actively seek out useful sources of data and set up processes for sharing and publishing that data.
- Councils also undertake vast amounts of monitoring and reporting as part of their Integrated Planning and Reporting (IP&R) requirements under the *Local Government Act 1993* (<https://www.olg.nsw.gov.au/councils/integrated-planning-and-reporting/framework/reporting>); and also to inform local environmental management plans, strategies and LEPs. The GSC should stipulate what sort of information (from the IP&R) would be useful and how it should be collected and reported. These data sources can then be fed into the District and Regional planning frameworks so that progress can be measured accurately, in detail and usefully. Close collaboration with the existing expertise of the Office of Local Government should be undertaken so as not to duplicate effort and place unnecessary burden on Council resources.

Recommended Action 2: Set up a sufficiently resourced *Monitoring, Reporting and Evaluation Unit* within the GSC to undertake a stocktake of existing data, set guidelines for the collection of data, help collate and analyse useful data, form partnerships and data sharing arrangements with all relevant institutions (e.g. the Office of Local Government, other State agencies, Councils, Universities etc.) and provide reports for evaluation. A compliance function could also be investigated.

KEY ISSUE 3 – Data and Appropriateness of Metrics:

- Under Objective 40, p.164: *“The Commission will monitor a range of metrics and report annually on the performance of the final plan. Monitoring and reporting will provide transparency to the community and other stakeholders on the progress of achieving the objectives and the vision. The metrics will be available on the Commission’s data hub.”*
- The draft GSRP contains 10 directions (with 14 associated metrics – see Figure 2), 40 Objectives, 60 supporting Strategies, and 14 supporting Actions. It appears that the 14 high-level metrics are to be reported on as indicators of progress, however no evidence has been provided as to their usefulness for evaluation of plan success. With the same 14 metrics proposed to be reported on for the draft District Plans, this represents a significant flaw in the GSC’s data strategy.

10 Directions	Plan metric (service)
 1. A city supported by infrastructure	• Number of land use plans supported by infrastructure plans (NSW Department of Planning and Environment, Greater Sydney Commission, Councils).
 2. A collaborative city	• Proportion of agreed outcomes achieved in Collaboration Areas.
 3. A city for people	• Annual survey of community sentiment.
 4. Housing the city	• Number of councils on track to deliver housing targets. • Number of councils with schemes that implement Affordable Rental Housing Targets.
 5. A city of great places	• Percentage of dwellings within walking distance of a local or strategic centre. • Percentage of dwellings within walking distance of open space.
 6. A well-connected city	• Percentage of dwellings located within 30 minutes by public transport of a metropolitan city centre/cluster. • Percentage of dwellings located within 30 minutes by public transport of a strategic centre.
 7. Jobs and skills for the city	• Growth in jobs in the following metropolitan and strategic centres, Blacktown, Campbelltown - Macarthur, Greater Parramatta, Greater Penrith, Harbour CBD, Kogarah, Liverpool, Macquarie Park and Western Sydney Airport/ Badgerys Creek Aerotropolis. • Change in number of people employed locally (five year).
 8. A city in its landscape	• Proportional increase in Greater Sydney covered by urban tree canopy.
 9. An efficient city	• Number of precincts with low carbon initiatives.
 10. A resilient city	• Number of local government areas undertaking resilience planning.

Figure 2 Proposed metrics for both the draft GSRP and draft DPs to be reported annually to Parliament.

- The draft District Plans also abound with Planning Priorities and Actions that would benefit from closer monitoring. For example:
 - draft Eastern City District Plan has 20 Planning Priorities and 74 supporting Actions;
 - draft Northern District Plan has 22 Planning Priorities and 78 supporting Actions; and
 - draft Southern District Plan has 18 Planning Priorities and 76 supporting Actions.

The GSC must partner with Councils and other agencies that currently have oversight of data relevant to the Planning Priorities and Actions (identified above) when developing the new *Monitoring, Reporting and Evaluation Framework* document (see Recommendation 3 below).

- Furthermore, limiting monitoring activities to the tracking of data that is readily available, inherently limits the ability for the public to scrutinise the effectiveness of all policy interventions proposed. This appears to be a short-sighted strategy. There exists already a broad, diverse range of data being collected across the Greater Sydney Region, collected for multiple purposes. There is a clear mandate for the GSC to take a lead-coordinator role in this space. A thorough and robust monitoring, reporting and evaluation framework is required to make the draft GSRP a dynamic, agile, adaptive, and ultimately useful planning framework.
- Within the draft GSRP or the Directions document, there is no evidence of the link between the metrics chosen and their relevance for telling a useful story on environmental performance. For example, it's not clear as to how an annual report on the percentage of urban tree canopy will be able to guide and refine policy around healthy coasts and waterways (Objective 25). Clearly, further data will be required to measure the success in implementing strategies and actions to achieve Objective 25, and it is our contention that this must be clearly identified up-front to ensure the ongoing success of the GSRP. These additional, finer grained metrics should be prescribed, resourced, collected and reported under the *data hub* and be contained within the GSC's annual report to Government. It is only with this finer grained information that the usefulness of the top-level indicator (not metric) can be established, and therefore the usefulness of the policy.
- The existing metrics reported on the 'data hub' do not clearly reflect objectives in the draft GSRP, nor do they reflect Planning Priorities in the District Plans. For example, it is noted within the data hub that reporting on the sustainability theme already uses the following metrics:

- o Housing density,
- o Urban tree canopy % cover,
- o GHG emissions from (a) transport (b) waste (c) gas and electricity,
- o Recycling rate across LGA and Districts,
- o Numbers of bushfire prone properties by District, and
- o Reported land surface temperature during a hot day in February 2011.

None of the above metrics currently reported on the GSC's data hub explicitly match the metrics identified in Figure 2 above.

- It is noted that the significant amendments made to the *Environmental Planning and Assessment Act 1979* passed by both Houses of Parliament in late November 2017 will require councils to prepare and review Local Strategic Planning Statements (LSPS) every seven years. LSPSs will set out the Planning Priorities and Actions from relevant strategic, district or community strategic plans and require each council to identify how they will monitor and report on those actions.

This Amendment appears to remove much of the burden of monitoring and reporting from the GSC and places it back on Councils. If that is the case, the GSC must still lay out and coordinate the framework as suggested in Recommended Action 3 below.

Recommended Action 3: Re-name the proposed metrics 'indicators' and develop a new *Monitoring, Reporting and Evaluation Framework* document that clearly:

- a. Outlines available data,
- b. Identifies appropriate missing data. Metrics should be developed for each Objective in the draft GSRP as well as for each of the Planning Priorities set out in the draft District Plans,
- c. Produces guidelines and protocols for Councils and agencies collecting and reporting data,
- d. Sets out an appropriate creative commons license to enable sharing and third-party interrogation of that data,
- e. Provides an appropriate and transparent basis upon which to evaluate the success or otherwise of various planning and policy interventions (including the draft GSRP, draft District Plans and revised LEPs).

KEY ISSUE 4 – Collaboration Areas:

- The draft GSRP notes on p.34: “Collaboration across the three tiers of government and across State agencies is essential for coordinating land-use and infrastructure planning and delivery.” While a useful statement, with excellent intent, it fundamentally neglects environmental bottom lines. Recognising and providing for the maintenance of environmental bottom lines is the foundational pillar of ecologically sustainable development. This statement should be reworded to reflect that alignment of council and government agencies to achieve better environmental outcomes is of at least equal importance.
- Importantly, with the inclusion of ‘neighbourhoods’ as a potential scale in addition to LGAs, the concept of ‘Collaboration Areas’ (as per Figure 3 below) can be transferred across scales and across boundaries. If neighbourhood level has been deemed a ‘fit-for-purpose’ scale within which agencies must collaborate to achieve better results, then surely the vast amounts of science saying *ecosystem based management* is the most effective way to manage natural capital must also be heeded. Managing vast, diverse and interlinked ecosystems (like those that are found on our coastal margins) is an old problem that requires a new solution. As a uniquely positioned governing actor, the GSC should take a more proactive coordination role in addressing some of the thorny governance issues around natural capital and shared environmental assets.

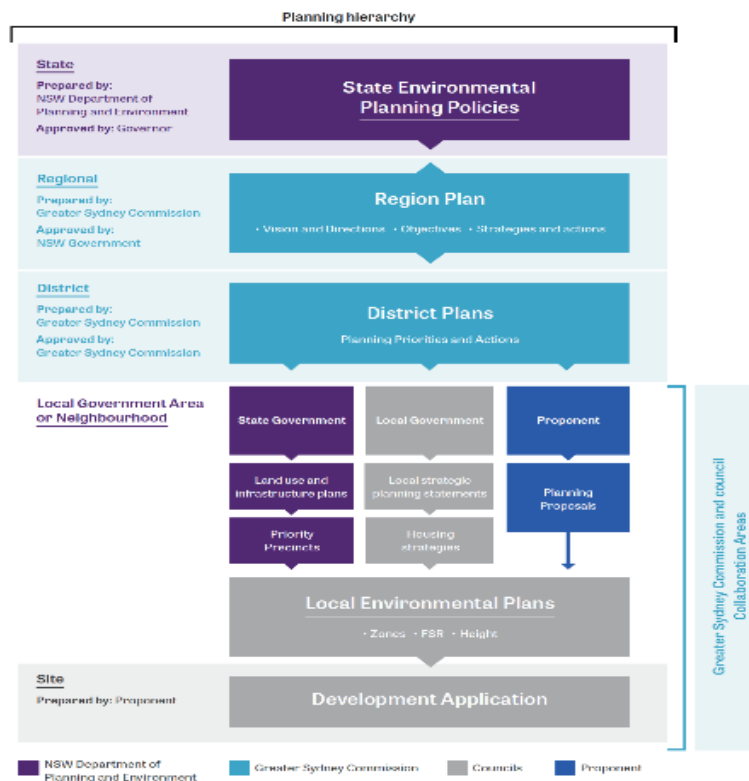


Figure 3 Proposed planning hierarchy and mechanism for ‘Collaboration Areas’

- Thus Objective 5 should be enhanced to recognise that the same governance issues exist when attempting to manage for environmental sustainability outcomes. Coasts and estuaries are a classic example of this, and indeed Sydney Harbour provides a clear case study for previous uncoordinated management and ongoing sectoral, jurisdictional, complex and poorly integrated governance¹. Governance has been highlighted time and again as an issue needing urgent attention by:
 - activities under the *Marine Estate Management Act 2016* (particularly the Threat and Risk Assessment process for the Hawkesbury Marine Bioregion),
 - the need for the NSW Coastal Council as espoused under the *Coastal Management Act 2016*,
 - the formation of Regional Organisations of Councils (ROCs) like SCCG and WSROC and SSROC etc.) is in itself clear recognition that some issues go beyond jurisdictional boundaries, traditional sectoral interests and local government land areas. This is particularly so for the good management of environmental assets and natural capital that work as ecosystems,
 - various Federal inquiries into coastal management and climate change (e.g. [2009 George Report](#)), and
 - the Productivity Commission inquiries into [natural disaster funding](#) (2014) and [barriers to effective climate change adaptation](#) (2012).

- It is noted that the map in Schedule 1 of the *Greater Sydney Commission Act 2015* identifies the Greater Sydney Region and includes all waterbodies within that area. However, the recent exhibition of the proposed Environment SEPP adds additional complexity to the management of waterways (Sydney Harbour in particular). The links between the role of the GSC (and the ambit of the draft GSRP and draft District Plans), and the newly proposed *Environment SEPP* must be clearly stated in the final GSRP. The role of State agencies (like Department of Industry (Crown Lands), Roads and Maritime Services as 'owner' of the seabed and foreshore, harbour Councils, traditional Aboriginal interests and other interests must also be clearly articulated.

- Furthermore, transitioning some key environmental sites and landscapes to become 'Collaborative Areas' will reflect international best practice and the shift toward holistic, *ecosystem based management*. For example, collaborative approaches to environmental governance have been trialled successfully in New Zealand through mechanisms such as:

¹ It is noted that the draft *Environment SEPP* (currently on exhibition) proposes to consolidate a number of existing SEPPs that relate to Sydney Harbour – including the *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005* and other SEPPs that relate to catchments.

- o the Land and Water Forum (addressing conflict between farming and clean water), and *Tai Tumu Tai Pari/Hauraki Gulf Marine Spatial Plan* - a successful collaborative approach to marine spatial planning in the contested waters of the Hauraki Gulf off Auckland.

Similar collaborative approaches have also been undertaken in NSW:

- o *The Marks Point and Belmont South Adaptation Plan* (Lake Macquarie Council),
- o *The Resilient Valley, Resilient Communities - Hawkesbury-Nepean Valley Flood Risk Management Strategy* involving the NSW Government, councils, businesses and the community.

Recommended Action 4: Add an additional Action in the draft GSRP to identify (in conjunction with Councils and other stakeholders) appropriate coasts and waterways as *Collaboration Areas*.

KEY ISSUE 5 – Implementation:

- The previous submission provided by SCCG included a high level of support for the proposed development of Implementation Plans (IPs) for each action under a District Plan. Much of the detail and many specifics were deferred until the development of IPs. For example, the IPs were to contain:
 - o the **target outcome** that the action seeks to deliver,
 - o how the **action** relates to the outcome, and the means to achieving it,
 - o the **timeframe** for delivery,
 - o the **measurement** of progress through quantitative KPIs,
 - o **responsibility** for delivering the outcome, including stakeholder collaboration,
 - o how **accountability** will be enforced by the Commission or another party, and
 - o how progress will be **reported** to the NSW Government and the public.
- Despite between 17% - 25% of all submissions raising issues to do with implementation, there was no discussion in either of the submission reports or in any of the draft plans currently on exhibition. It is unclear then why these IPs are no longer policy. SCCG's comments on the importance of their ambit are still very much valid:

"The SCCG recognises the critical importance of these Implementation Plans and has concerns over the lack of clarity around their proposed content, publication, and timetable for consultation. Our own consultation has confirmed that many Councils prefer 'hard' targets upfront because it gives them certainty in communicating their own strategic intent and delivering that through land use

planning. The SCCG recommends that the implementation plans (if they are to be carried forward in their current form) be the subject of further detailed consultation and this process be co-designed with local government'. Many of the comments that could be made at this stage of the public exhibition process are relevant to the proposed outline of the IPs. For example, each action and priority will have its own evidence base and be subject to existing programs that support those goals."

- Of critical importance to the successful implementation of the draft GSRP and draft District Plans is the need for the GSC to be more proactive and coordinate beyond the realms of traditional agency stakeholders and government partners. For example, the *100 Resilient Cities* program may identify the need for a regional Sydney Climate Change Adaptation and Mitigation Strategy. This is a classic example of how a unique organisation like the GSC could take the lead on developing new initiatives.
- The SCCG are concerned that (at this stage) only 14 specific actions are proposed to address the 40 Objectives and at least 60 supporting Strategies proposed in the draft GSRP (see Figure 4 below). Again, there is no justification as to why these 14 specific actions have been chosen above others. At the very least, this needs clarification to ensure transparency. It is appropriate here to reiterate the critical importance of a robust data strategy, that leads into a *Monitoring, Reporting and Evaluation Framework*. The selection of key parameters as 'indicators' of progress must be justified to satisfy the goal of 'evidence-based policy'.

Action	Lead Agency
1. Identify, prioritise and deliver Collaboration Areas.	Greater Sydney Commission
2. Prepare housing strategies.	Local Government
3. Develop 6–10 year housing targets.	Greater Sydney Commission, Local Government
4. Work with the NSW Department of Planning and Environment to implement Affordable Rental Housing Targets.	Greater Sydney Commission
5. Collaborate to deliver the Greater Parramatta and the Olympic Peninsula vision.	Greater Sydney Commission
6. Develop a growth infrastructure compact for GPOP.	Greater Sydney Commission
7. Support the growth of the Camperdown-Ultimo Collaboration Area.	Greater Sydney Commission
8. Collaborate to deliver the Western Sydney City Deal.	Australian Government, NSW Government, Local Government
9. Facilitate whole-of-government place-based outcomes through Collaboration Areas for targeted strategic centres, including Liverpool, Greater Penrith and Randwick.	Greater Sydney Commission
10. Review industrial and urban services land in the Central River City and the South West and North West Priority Growth Areas.	Greater Sydney Commission
11. Develop and implement the South Creek Corridor Plan.	Infrastructure NSW
12. Deliver the open space toolkit.	Government Architect NSW
13. Work with the NSW Department of Planning and Environment to develop its role in peer reviewing key land use and Infrastructure plans prepared by NSW Department of Planning and Environment to provide assurance to the community that robust planning is being undertaken across Greater Sydney consistent with the directions, priorities and objectives of the District and Region Plans.	Greater Sydney Commission
14. Report on Actions.	Greater Sydney Commission

Figure 4 Actions to deliver the GSRP from p.166

- Another environmental issue which could be addressed region or district-wide might be a program to identify and secure public and private land for the conservation of biodiversity corridors (and the enhancement of the Blue-Green Grid).

For example, the Connected Corridors for Biodiversity project facilitated by SSROC through the SCCG '[Salty Communities Program](#)', funded by the Australian Government, created a habitat corridor map across 23 local government areas, and developed a guide to the regulatory tools, financial incentives, and other mechanisms used by councils to promote biodiversity conservation on privately owned land. The habitat corridor map and guide are a decision-support tool to assist in prioritising investment in

local / regional scale habitat connectivity on both public and private land. The map has been produced as a tool to also prioritise on-ground works and other programs to improve habitat connectivity within a Council LGA or between neighbouring council boundaries. The SCCG recommends that the connected corridors biodiversity habitat map be incorporated within the draft GSRP and the draft District Plans.

Recommended Action 5: It is critical that the GSC produce a statement clarifying how the detail of the now defunct IPs will be carried forward. Preferably this statement should address the new role of *Local Strategic Planning Statements*, clearly articulate the new hierarchy of planning documents, and outline legislated monitoring requirements, agency roles and accountability.

3. COMMENT ON SPECIFIC OBJECTIVES:

The draft GSRP includes a discussion of selected key points to accompany each of the 40 Objectives. Specific Strategies are interspersed throughout the text and related government initiatives are highlighted. The SCCG generally supports the scope of these Objectives. The following points are made on specific Objectives in the draft GSRP where the SCCG hopes to highlight improvements:

- **Objective 5** – benefits of growth realised by collaboration of governments, community and business:
 - Broaden scope of Collaboration Areas to include key environmental assets (see Key Recommendation 4 above).

- **Objectives 25** – the coast and waterways are protected and healthier
 - SCG commends the GSC for recognising coasts and waterways as a critical element of green infrastructure (p.128) and highlighting the multitude of existing initiatives and agency mandates for the protection and management of these environmental assets.
Because of the diversity of agencies responsible for implementing the strategies identified under this objective, it is crucial that environmental data relating to this objective is incorporated into the new *Monitoring, Reporting and Evaluation Framework* document.

- **Objective 32** – the Green Grid links parks, open spaces, bushland and walking and cycling paths
 - Healthy, functioning waterways are strongly linked to the health of their surrounding

catchment. Area of Green Grid (as identified) often overlap with waterways or coast. This Objective would benefit from having explicit links made to Objective 25 (and would further support our previous submission and its discussion of the *Blue-Green Grid*). Having this stated up-front in the draft GSRP would highlight links identified elsewhere in the draft GSRP (p.145) and draft District Plans (e.g. Eastern City draft District Plan p.104-106).

- **Objective 36** – people and places adapt to climate change, future shocks and stresses
 - Objective 36 as currently worded would be met even if people and places made poor adaptation decisions (maladaptation). Some measure of ‘appropriateness’ should be included in the wording of the Objective. Furthermore, it is unclear how initiatives to respond to the impacts of climate change will be identified (what criteria?), how they will be supported (resources?), and who will be responsible?
- **Objective 37 – exposure to natural and urban hazards is reduced** (page 153).
 - SCCG commends the GSC for the expansion in scope of this objective to include a wider array of urban and natural hazards, although there is no mention of the *Coastal Management Act 2016* and its requirements as a related government initiative.

4. DISTRICT PLANS

There are three draft District Plans of interest to the SCCG. Each of these three draft District Plans are supported by Planning Priorities and Actions to achieve those Priorities:

- Eastern City District Plan - 20 Planning Priorities and 74 supporting Actions,
- North District Plan - 22 Planning Priorities and 78 supporting Actions, and
- South District Plan - 18 Planning Priorities and 76 supporting Actions.

4.1 COMMENTS

Key Issue – unnecessary repetition:

- The Actions in the draft District Plans are unnecessarily repetitive. Many of the *Planning Priorities* and supporting *Actions* re-state verbatim what is listed as a *Strategy* in the draft GSRP. For example, Figures 5 and 6 provided below are identical in content, however Figure 5 comes from the draft Eastern City District Plan, Figure 6 has been extracted from the draft GSRP. This pattern is repeated throughout the draft District Plans.

- Although the draft District Plans go further and assign responsibility for each *Action* to a particular agency or set of agencies; this adds very little value, particularly when the higher-order metrics (really *indicators*) being reported on are so narrow.
- While it is noted that “Some of the planning priorities and actions are common across all revised draft District plans, and tailored to each District’s context” (including specific commentary relevant to each District) - there seems little value in re-stating or re-badging higher order Strategies as Actions from the draft GSRP in a draft District Plan.
- Much of the supporting text under each Planning Priority contains detail that is lacking in the specified Actions for each District Plan. As this will be where Councils focus during the re-design of their LEPs, Community Strategic Plans and the new Local Strategic Planning Statements; tailored information should be extracted and rephrased as an explicit Action. The resulting Actions would be explicit statements, tailored and relevant to their District context, while enabling greater transparency and accountability.

Figure 5 p.96 Draft Eastern City District Plan (ECDP) showing Actions 57-60 that support Planning Priority 14.

 Actions	Responsibility
57. Protect environmentally sensitive coastal areas and waterways.	Councils, other planning authorities, State agencies and State-owned corporations
58. Enhance sustainability and liveability by improving and managing access to waterways, foreshores and the coast for recreation, tourism, cultural events and water-based transport.	Councils, other planning authorities, State agencies and State-owned corporations
59. Improve the health of catchments and waterways through a risk-based approach to managing the cumulative impact of development including coordinated monitoring of outcomes.	Councils, other planning authorities, State agencies and State-owned corporations
60. Reinstate more natural conditions in highly modified urban waterways.	Councils, other planning authorities, State agencies and State-owned corporations

Figure 6. Draft GSRP p.130

Strategy 25.1

Protect environmentally sensitive coastal areas and waterways.

Strategy 25.2

Enhance sustainability and liveability by improving and managing access to waterways, foreshores and the coast for recreation, tourism, cultural events and water-based transport.

Strategy 25.3

Improve the health of catchments and waterways through a risk-based approach to managing the cumulative impacts of development including coordinated monitoring of outcomes.

Strategy 25.4

Reinstate more natural conditions in highly modified urban waterways.

Recommended Action: For each District Plan, the supporting text under each Planning Priority should be translated into specific Actions.

5. CONCLUSION

Overall, the SCCG is supportive of the advancements made to regional planning in the Greater Sydney area. However, it is critical that the GSRP makes the transition from high level strategy and guidance to implementation on the ground. This is an area where many of the previous attempts at regional planning in Sydney have been inadequate. The Greater Sydney Commission provides us now with a unique governance structure to coordinate the successful implementation of Objectives. Measuring progress towards that success will be crucial. In a changing social, economic and ecological landscape reporting on and evaluating the appropriate metrics takes on an even more important role as we may need to adapt or alter our strategies to tackle new, possibly unforeseen problems. Live-tracking these metrics via the online *data hub* will provide residents a useful tool to track progress, but also provide government with a commendable way of supporting transparency and accountability in decision-making. That is why SCCG recommends that an appropriate *Monitoring, Reporting and Evaluation Framework* be the foundation of the final Greater Sydney Region Plan and its five supporting District Plans.

To achieve this outcome, the Greater Sydney Commission must continue to be proactive and continue to form and maintain collaborative partnerships with councils and other agencies. '*Connecting people*' (as in the title of the draft GSRP) is an apt sub-title and will be of utmost importance in making the implementation of the plan successful and achieving the vision for a global metropolis of productive, liveable and sustainable cities.