28 March 2017

Dear Sir/Madam,

Re: Public Exhibition of the draft District Plans for Greater Sydney

The Parramatta River Catchment Group (PRCG) thanks you for this opportunity to comment on the draft District Plans for Greater Sydney and congratulates you on their development. The Parramatta River catchment lies within Sydney’s Central, West Central and North Districts across Sydney’s Central, West Central and North Districts, and so forms an important geographic and social link between these three planning districts.

The PRCG is a regional, non-statutory organisation of local councils, government agencies and community groups who share responsibility in managing the health of the Parramatta River and its catchment area. Our mission is to make the Parramatta River swimmable again by 2025. Financial members include all 11 Councils that lie within the catchment, as well as Sydney Water, Department of Planning and Environment and the Environment Protection Authority.

In brief, the PRCG makes the following key recommendations towards the Central, Central West and North District Plans:

1. Reference, support and showcase the Parramatta River Masterplan as a key planning framework for the Parramatta River
2. Reference the mission to make the Parramatta River swimmable again as part of the vision for the Parramatta River
3. Establish new, minimum standards for development that incorporate targets set within the Parramatta River Masterplan
4. Nominate and support a lead agency and develop a sustainable, centralised funding mechanism to strategically coordinate catchment-wide management objectives for the Blue and Green Grids
5. Mandate the use of the risk-based decision framework to ensure Blue Grid outcomes are articulated and achieved
6. Embed Water Sensitive principles into the District Plans, at all levels, and collaborate across local and State government and the community at the onset of planning for all new infrastructure projects on public lands
7. Ensure new Parramatta River ferries are designed to produce low wash
8. Integrate the Parramatta River’s iconic species approach and enhanced biodiversity corridors into section 5.5 Protecting and enhancing biodiversity and section 5.6 Delivering Sydney’s Green Grid
Details on each Recommendation are provided further below.

The PRCG applauds the Commission’s commitment to explore new forms of governance arrangements for the Blue Grid in the review of A Plan for Growing Sydney in 2017. The PRCG has commissioned Macquarie University to review waterway governance frameworks to inform future improvements in catchment management. This involves review of current governance structures, examination of successful precedents and stakeholder workshops and interviews across the catchment. Preferred governance options will be identified and documented. **We welcome the opportunity to contribute to this important review from its outset.**

Please do not hesitate to contact [redacted] should you require further explanation or assistance in developing these recommendations further. We would be more than happy to assist.

Again, thank you for this opportunity to comment.

Yours sincerely,

Sarah Holland Clift
Parramatta River Catchment Group Coordinator
Recommendation 1: Reference and showcase the Parramatta River Masterplan as a key planning framework for the Parramatta River

The PRCG is currently developing a Masterplan for the Parramatta River, to provide the roadmap for making the river swimmable again. This Masterplan is being developed collaboratively across all agencies with management responsibility for the Parramatta River catchment and is guided by a Reference Group that include the Greater Sydney Commission Environment Commissioner, CEO of the NSW EPA and Managing Director of Sydney Water. Its methodology follows the Office of Environment and Heritage and Environment Protection Authority’s risk-based decision framework.

Due for completion late 2017, we propose that this Masterplan be explicitly referenced and showcased in the District Plans as a key planning framework for the Parramatta River (see proposed inset box below). This will also provide a practical example of a ‘Collaboration Area’, as described in the Draft District Plans.

Additionally, the North District Plan Sustainability Priorities 1, 2 and 3 (p. 128-129) should include the Parramatta River and its tributaries.

A draft inset box for the Central, Central West and North District Plans:

Case study: A blueprint for river swimming

The Parramatta River is Australia’s most iconic waterway, being central to Australia’s indigenous and colonial history and the development of modern Sydney. To improve access and amenity to the burgeoning business and residential population of Western Sydney, the Parramatta River foreshore has become the focal point for enhancing a network of open spaces, walkways and cycleways. To extend on the value of the river for recreation and provide Sydney residents with more local, natural places to swim, new river swimming destinations will be opened over the coming years. The NSW Government is working in collaboration with local councils and the community to develop the Parramatta River Masterplan, which will provide the blueprint for how this is achieved.

The Masterplan adopts the Office of Environment and Heritage and Environment Protection Authority’s risk-based decision framework to achieve the community’s desire to make the river swimmable again.

Recommendation 2: Reference the mission to make the Parramatta River swimmable again as part of the vision for the Parramatta River

The goal to swim in the river is clearly articulated in the Greater Parramatta to Olympic Park (GPOP) Corridor Plan, but not in the three District Plans. This mission is clearly supported by the community, evidenced by a recent statistically significant survey* of 1100 residents within the catchment. It also has the support of all PRCG member agencies. Given the extent of support and collaborative nature of developing this mission, it should be clearly articulated as an outcome in the Central, Central West and North District Plans.

Specifically, the Central District Plan 3.3.4 should reference the swimming mission as part of the ‘developing vision’ for the Parramatta River. *See Appendix A for a summary of the community research results. The full report is available upon request.
Recommendation 3: Establish new, minimum standards for development that incorporate targets set within the Parramatta River Masterplan

Each of the priorities under a Productive, Liveable and Sustainable City, state that “How these matters are to be taken into account must be demonstrated in any relevant planning proposal”. This wording allows for considerable variability in implementation across each District Plan and even within each local government area. Consistent statutory planning frameworks should be developed and administered at the regional and local scale. As a minimum, the District Plans should set the target that all current and future development must result in a neutral or beneficial effect on river quality. Frameworks should also include provisions for biodiversity, bank stabilisation, foreshore building lines, riparian setbacks and public access, and consider projected climate change scenarios. For the Parramatta River, a direct statement such as “all future development should consider the targets set within the Parramatta River Masterplan” would be appropriate, as it will outline very specific, evidence-based targets for river quality.

Additionally, a) in the Central West District Plan, Action S2 should include the Parramatta River, not just South Creek, given “the developing central city with GPOP at its heart is anticipated to experience the most significant urban transformation over the next 10 to 15 years” and b)

Recommendation 4: Nominate and support a lead agency and develop a sustainable, centralised funding mechanism to strategically coordinate catchment-wide management objectives for the Blue and Green Grids

Lack of clear leadership and funding have been identified by our members as key barriers to achieving effective catchment-wide management and subsequent waterway outcomes for the community. We recommend that the Greater Sydney Commission or another relevant body be given a leadership role in unlocking a whole of government approach to managing the Parramatta River on par with what has been achieved for Sydney Harbour and Sydney’s beaches. In addition, we recommend that a major injection of state coordinated funding be invested to facilitate enhanced water quality and public open space outcomes that will benefit the whole of greater Sydney community. Such funding should not take the form of short term funding programs, as proposed in S3 for the Green Grid, but instead follow successful models such as the Lake Macquarie Improvement Project ($10,917,026 from 1999/00 to 2007/08), Lake Illawarra Restoration Project ($21,083,000 from 1987/88 to 2009/10) or Upper Parramatta River Catchment Trust (levy funded until 2006), which all achieved major waterway outcomes.

Recommendation 5: Mandate the use of the risk-based decision framework to ensure Blue Grid outcomes are articulated and achieved

The Draft District Plans state that relevant planning authorities and managers of public land should adopt the NSW Office of Environment and Heritage and Environment Protection Authority’s risk based framework as a means of determining appropriate stormwater and wastewater management targets. A consistent, outcomes-based approach to our waterways, backed by legislation, is needed to identify appropriate catchment actions to achieve the desired community outcomes for our waterways. We recommend that such an ‘outcomes-based’ approach be mandatory, not optional, and therefore stronger wording be used to reflect this.

Recommendation 6: Embed Water Sensitive principles into the District Plans, at all levels, and collaborate across local and State government and the community at the onset of planning for all new infrastructure projects on public lands

Working towards a water sensitive Greater Sydney is paramount to achieving the goals of the District Plans. Sydney’s green grid of parks and open space should be maintained using vegetated stormwater management systems that provide passive irrigation and/or recycled water. This will conserve potable water while enhancing city greening, cooling and liveability. Given the limited public space available, meaningful collaboration across relevant local and State agencies and the community at the onset of planning for all new infrastructure projects on public lands should be clearly stated in the Plans, to ensure multiple, beneficial outcomes are achieved. This includes existing and planned corridors for transport, water, wastewater, stormwater, energy and communications.
We propose a new section on water under 5.7.2 Energy and Water be created, entitled “Embed water sensitive city principles in planning controls”.

Recommendation 7: Ensure new Parramatta River ferries are designed to produce low wash

The Central West District Plan on P. 66 should explicitly state Parramatta River ferry initiatives, including additional weekly services, new Parramatta River ferries with a low wash design and environmentally sensitive wharf upgrades. The wash from the current Rivercats causes significant foreshore and seawall erosion. Therefore, the Parramatta River Estuary Coastal Zone Management Plan, certified by the Minister for Planning and Environment, includes specific actions for new Rivercat ferries to be designed to produce low wash in their movement. The PRCG has also received a letter from the Minister for Transport assuring us that minimising ferry wash is a key criterion in the design process for the 4 new Parramatta River ferries planned.

Recommendation 8: Integrate the Parramatta River’s iconic species approach and enhanced biodiversity corridors into section 5.5 Protecting and enhancing biodiversity and section 5.6 Delivering Sydney’s Green Grid

We have worked with our partners and the community to identify five iconic species (also termed mascots) within the Parramatta River catchment that are valued by community and whose presence and habitat requirements link to the goal to make the river swimmable again. These five mascots have now become the focal point for management and monitoring of the river’s ecological health in a way that connects intimately to the values they provide to our growing communities. The iconic species were selected by over 5000 community votes and include: Powerful Owl (Ninox strenua), Southern Myotis (Myotis macropus) or Fishing Bat; Bar-tailed Godwit (Limosa lapponica); Eastern Long-necked Turtle (Chelodina longicollis), and the Striped Marsh Frog (Limnodynastes peroni).

Opportunities to enhance priority habitats and movement corridors for these species should be directly referred to in actions relating to the Green and Blue Grids, and should be a consideration at the onset of planning for all new infrastructure projects on public lands. This will help facilitate the movement of native fauna and provide physical and mental health benefits to the community.

This approach could similarly be applied to other waterways across Sydney.

Figure 1: Recommended management actions for the five Parramatta River mascots and their swimmability benefits.