



**NSW Greens
Submission
26 August 2013**

Broader Western Sydney Employment Area Draft Plan

Department of Planning and Infrastructure

Thank you for the opportunity to comment on the Broader Western Sydney Employment Area draft Structure Plan.

Like this government's overall direction on planning the western Sydney Employment Area draft plan fails to adopt as its key planning principle the concept of ecologically sustainable development (ESD).

For the Greens NSW the failure to implement ESD means that the Draft Plan places excessive weight on economic activity and employment goals without adequate consideration of the social and environmental needs of greater western Sydney. If implemented this will lead to unsustainable development where short term job creation leads to the long term degradation of the environment and social structures in Sydney.

Western Sydney remains the bio-bank for Sydney, containing a range of critically endangered flora and fauna. The area covered by the plan includes some of the last refuges of birds, animals and plants that have retreated from other areas of Sydney.

The Greens NSW wish to make the following comments on the plan;

Environmental Impact

- The current draft plan could destroy or severely impact at least twenty square kilometres of critically endangered ecosystems.
- The map of the proposed plan clearly shows that very large areas of environmental significance will be destroyed. Only 600ha of woodland will be retained.
- The offsets proposed in the plan are unrealistic. The level of environmental damage and inappropriate development now means it is unlikely that there are any suitable sites in the area that are not already reserved as offsets for other projects. There is no way to replace these ecological communities.
- The plan will lead to further fragmentation and loss of endangered Cumberland Plain woodland.

Inadequate Ecological Assessment

- The plan does not include adequate ecological assessment of flora and fauna. This 'ecological study' does not mention entire species that have been identified by local communities, such as *Marsdenia viridiflora* var *vidiflora*, are not mentioned in the report
- The flora and scrub mapping process is inadequate and overly relied on aerial mapping. Much of the endangered species have little to no canopy that would be visible in such mapping. A new study must include field mapping.

Heritage concerns

- It is likely that the push for fewer planning protections in Western Sydney will lead to development that destroys the existing heritage fabric of suburbs. Greater Western Sydney has some of the richest colonial and aboriginal heritage in Sydney.
- The plan needs stronger and meaningful protections for the Aboriginal heritage of the Dharug and Eora people. Provision must be made for proactive Aboriginal Heritage surveys before any significant development is allowed on rural, semi-rural and bushland in the region.
- Specific provisions must be included to protect the priceless colonial heritage in Western Sydney from Camden to Windsor, Rouse Hill and Parramatta.

Transport links

- The North of the Western Sydney Employment Area is at the intersection of the M7 and M4 Motorways but long term growth of this area will require substantial development of active transport links like cycleways and public transport to major centres and the surrounding area. The reservation of rail corridors is a necessary but by no means sufficient solution for integrated transport needs.

Real Jobs for Western Sydney

- The Erskine Park and Interchange Park industrial and business parks have primarily attracted logistics companies that bring relatively few jobs. Even these industries have only relocated here because they are located adjacent to the motorways. It is unlikely that the remainder of the site will be utilised effectively due to poor transport connections.
- If the Government is serious about jobs for Western Sydney it should be supporting the existing industries in the peri-urban areas such as farming, animal husbandry and market gardens which are already thriving and bring real and sustainable jobs to Western Sydney.

Timing

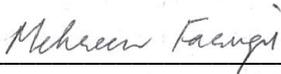
- The Greens NSW are concerned that this consultation is being done prior to Parliament's consideration of the government's proposed planning reforms. It is likely that the government will seek to use this regional planning document to grant developer's favourable spot rezoning through the use of Strategic Compatibility Certificates under the scheme advanced in the draft Planning Bill. This would be an unacceptable loss of community control over Western Sydney's future and a poor planning outcome for Western Sydney.

- With the government's controversial planning reforms not yet made law there is a great deal of uncertainty in the planning framework that this draft plan will fit into. This uncertainty is unacceptable for residents and other stakeholders who are required to second guess the outcome of parliament when making submissions to this draft plan.

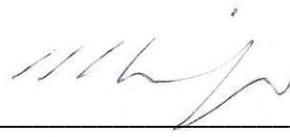
In conclusion, the NSW Greens call on the Department of Planning to suspend the plan, await the outcome of the planning reforms in the NSW Parliament and undertake a comprehensive ecological flora and fauna study before resubmitting the plan for public consultation.

Thank you for the opportunity to comment.

Regards



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