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Nature Conservation Saves for Tomorrow

Greater Sydney Commission
PO Box 257 Parramatta
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Subject: *Draft West Sydney District Plan*

The Blue Mountains Conservation Society (BMCS) is a community based volunteer organisation with over 850 members. It is the oldest continuing environmental organisation in the Blue Mountains. The goal of the Society is to promote the conservation of the environment in the Greater Blue Mountains region. We are pleased to have the opportunity to comment on the *Draft West District Plan*.

The BMCS has a long history of engagement in strategic planning, most recently in the development of Blue Mountains LEP 2015 where the Society campaigned for a new LEP which recognised the significance of the World Heritage Area to the Blue Mountains and included special provisions that protected and enhanced it. The Society's efforts culminated in co-ordinating a coalition of 39 local community leaders, business bodies, environmental organisations and heritage groups declaring their support for an environmentally sound LEP through an Open Letter to the Minister of Planning published in a major metropolitan newspaper. The Open Letter was a first for the Blue Mountains, in terms of such a diverse and large number of business and community organisations and leaders publicly coming together to support an LEP aimed at delivering environmental and heritage outcomes.

The Society has been watching the development of the District Plans closely and attended the launch of the *Draft West District Plan* in Parramatta, the Better Planning Network's forum on the District Plans at Parliament House, the 'drop in' information session at Penrith, the West District Sustainability workshop and District Dialogue. We have also met with West District Commissioner Sean O'Toole on several occasions and believe him to be genuinely committed to engaging with and consulting the community.

We are aware that, once finalised, LEPs will be required to conform to the District Plans' Priorities and Actions. We hope that the coming review of Blue Mountains LEP 2015 when the *West District Plan* comes into effect won't see a diminution of the critical environmental protection provisions designed to minimise the risk of development to the Blue Mountains environment and the Outstanding Universal Values of the Greater Blue Mountains World Heritage Area. This would be a very poor outcome of the District Planning process and one that the BMCS would strenuously resist.

**The Blue Mountains Conservation Society's key
strategic planning issues and priorities**

The Blue Mountains Conservation Society's responses to the *Draft West District Plan* and the Priorities and Actions contained within it are informed by the following strategic planning issues and priorities:

1. **First and foremost, World Heritage values must be protected.** The Blue Mountains LGA has a unique status as one of only two cities in the world located in a World Heritage Area. It is the responsibility of all levels of government to ensure that the World Heritage Area is managed with care and diligence (Ministers' Foreword to *Greater Blue Mountains World Heritage Area Strategic Plan* 2009). Economic (including tourist) and residential development on the ridgeline above the World Heritage Area must not adversely impact on and pose threats to World Heritage values. This is a particular challenge because there is no buffer zone between the built-up areas and the national park. We are concerned that there is no reference in the *Draft West District Plan* to the *Greater Blue Mountains World Heritage Area Strategic Plan* (2009), signed off on by both state and federal governments, which identifies threats and potential impacts. We do not want to find ourselves in a Great Barrier Reef-type situation where World Heritage listing is threatened because of the impact of human activity and development on the Greater Blue Mountains World Heritage Area.
2. **The BM LEP 2015 should not be undermined in any way through future amendments arising from the finalised *West District Plan*.** The Blue Mountains council and community fought hard to have protections for the Blue Mountains environment and World Heritage Area transferred from previous LEPs to the current Standard Instrument Blue Mountains LEP 2015. The zoning on all land currently zoned E2, the current protected area mapping, and the current environmental protection and subdivision control provisions of the LEP must be maintained. The Society supports the introduction of the new R6 Residential zone, but does not support the introduction of the SP3 Tourism zone. The Society also opposes the proposed changes to the Exempt and Complying Code as it applies to medium density residential housing, as this has the potential to significantly undermine the planning frameworks and controls established under LEP 2015. The proposed changes to the Code are totally unsuitable for the Blue Mountains.
3. **Any new housing target for the Blue Mountains must be achievable and environmentally sustainable given the high environmental values and the significant natural hazards (e.g. bushfires).** The BMCS had concerns that the DPE's previously proposed target of 9,000 new houses in the Blue Mountains LGA over the 20-year period from 2011 to 2031 (old *Draft West Subregional Plan*) was not achievable or environmentally sustainable. This was particularly so given the Council's estimate of the remaining undeveloped lots available, the lack of greenfield sites for new residential subdivisions in the Blue Mountains and low population growth. With only a 5-year housing target set for the Blue Mountains LGA in the *Draft West District Plan* we are concerned about the potential imposition of unachievable and unsustainable housing targets for 2036.
4. **Any new medium density housing (dual occupancies/townhouses/terraces), seniors, social or affordable housing should be targeted to existing residential areas very close to village centers and railway stations. However, this must be considered on a village by village basis through town masterplans.** Medium density housing is NOT suitable in areas backing onto bushland, or at the end of, or along, fire prone ridges, or heritage listed streetscapes. For instance Linden Railway Station is in a bushland location, and the southern side of Springwood Town Centre and associated streets back directly onto the national park and are unsuitable for medium density housing. We are therefore alarmed at the idea, on p.84 of the *Draft West District Plan*, of a 'transition area' of between 1 and 5 kms from

transport/village centres that could be used for urban renewal; specifically, for medium density housing.

5. **The current trend for subdivision of very large bushland lots (10ha and greater) at the end of long isolated ridgetop roads into smaller bushland lots (2-5ha) should be reviewed**, given the very high bushfire risk, impacts on watercourses and loss of natural bushland which is frequently of high conservation value. Recent examples of this kind of inappropriate development include a residential subdivision at St Columbas, Winmalee).
6. **Any tourism development in the Blue Mountains should not come at the cost of negative impacts on all bushland areas (public and private) including the National Park.** The Blue Mountains World Heritage Area is one of the few world heritage areas worldwide, recognised for its natural values and easily accessed in a day from a major capital city and international airport. It is vital that future tourism development should not intrude into the national park or impact on scenic or natural values. Future tourism and visitation development should also encompass the complete spectrum of visitation experiences – from single operator guiding operations or bed and breakfasts to larger scale tourism resorts. The strategic planning focus should not just be on the big tourism developments which often have had undesirable impacts on the environment. In addition, if increased tourism and visitation is a goal, the National Parks and Wildlife Service needs to be funded beyond current levels to adequately manage visitors – including visitor infrastructure such as signage and walking tracks – and to manage visitor impacts (e.g. weeds and bushland degradation). Similarly, the Blue Mountains City Council, who manages significant natural areas which experience a high number of tourists, also needs to be funded adequately beyond the local rate base – Council does not benefit from rates of local businesses when tourists are based in and out of the area and do not access local businesses.
7. **Given Penrith will be a focus for re-development, the preservation of the eastern escarpment, including its outstanding scenic values, is a high priority.** It is vital that no further inappropriate development occurs on the eastern escarpment including, for instance, housing creep from Emu Heights or inappropriate recreational development (e.g. the Knapsack Reserve downhill mountain bike track). Preservation strategies must include active management and consolidation of all land in public ownership (Crown land, various Council managed lands, National Parks, infrastructure easements and so on) and a long term strategic vision.
8. **There needs to be further identification and creation of wildlife/biodiversity corridors on private land within the Blue Mountains, where specific planning controls apply**, linking areas of privately owned bushland and the national park as well as corridors linking western Sydney bushland areas to the national park in the Lower Mountains.
9. **Resolution of the management of key Crown land.** There are significant parcels of Crown Land of high conservation and recreational value in the Blue Mountains. Some of these parcels are actively managed by Blue Mountains City Council as bushland reserves in partnership with Bushcare Groups. Other parcels are managed by the Dept of Lands, but with little active management taking place, and either should be incorporated into the national park or transferred to Council to manage. The “Blue Mountains Public Lands Rationalisation Project” – an initiative some years back involving NPWS (now Office of Environment and Heritage), Dept of Lands and Blue Mountains City Council – went through a rigorous process to determine the future management of the remaining Crown Land in the Blue Mountains but the recommendations were never implemented. The recommendations of the Public Lands Rationalisation Project should be urgently revisited and reviewed, including a public exhibition process. Key parcels of Crown Land which need urgent resolution in terms of long term management include areas along the eastern escarpment and mid Mountains.

10. The **development of recreational walking corridors linking the villages in the Blue Mountains**. We are therefore pleased to see the Penrith to Blackheath cycle and walking corridor listed as a Green Grid project for the Blue Mountains in the *Draft West District Plan*.
11. **Opposition to the Western Sydney Airport**, as both unnecessary and a risk to the heritage values of the Greater Blue Mountains World Heritage Area. None of the GSC documents consider the impact of 24/7 low altitude aircraft overflights on residential areas and on the flora and fauna of World Heritage and Declared Wilderness areas, Sydney's drinking water catchment and Lake Burragorang. These will be impacted by burned jet fuel, fine particulates, potential fuel dumping, and noise and visual pollution. This will also negatively impact on wilderness experience, and 'nature' and World Heritage Area tourism. Aircraft by-products also make a nonsense of the 'Special Area' surrounding Lake Burragorang which excludes humans in order to maintain drinking water quality. We wonder how the Blue Mountains City Council, which also opposes the airport, will sign up to the 'Western Sydney City Deal' which is premised on the airport going ahead. And we wonder how the vision for South Creek and *Draft West District Plan* Action S2 – protecting and improving the health of the waterway and vegetation along it (a blue and green corridor) – can be realized, given that South Creek and its tributaries currently running through the WSA site will be severely impacted by development of the airport and surrounds. Building the airport will also necessarily involve the destruction of remnant and regenerated Critically Endangered Cumberland Plain Woodland on the site which is impossible to 'offset'. The BMCS supports High Speed Rail as an alternative to the proposed WSA. See Attachment 1.
12. **Opposition to Coal Seam Gas extraction and extension of coal mining in the Greater Blue Mountains region**. The Society will vigorously oppose any re-issuing of Coal Seam Gas exploration licences and coal mine expansion in the Greater Blue Mountains region. We reject the view on p.96 of *A Plan for Growing Sydney* that the Sydney Basin is considered prospective for oil, gas, coal, coal seam methane and oil shale. This seems to conflict with the Greater Sydney Commission's welcome recognition of the challenge of climate change and the *NSW Climate Change Policy's* aspiration to achieve zero net carbon emissions by 2050.
13. **Opposition to raising Warragamba Dam wall**. The Society has consistently opposed the raising of the Warragamba Dam wall as a means of flood mitigation because of its environmental impacts and the ongoing risk to humans living and working on the floodplain. Raising the dam wall would create significant damage to the World Heritage Area including wilderness areas and the lower reaches of declared Wild Rivers. It would impact on plant and animal species and the vast areas of habitat that would become intermittently inundated. As the *Draft West District Plan* concedes (p.139) raising the dam wall would not eliminate all flood risk in the Hawkesbury-Nepean Valley, because the dam only deals with 50-60% of the Nepean-Hawkesbury catchment, and in a major rain event water would have to be released from the dam causing downstream flooding. Yet development on the floodplain has been allowed to proceed apace, again forcing the issue of raising the dam wall on us. The Society believes the flood risk should be managed through strong flood related development controls based on current and predicted future flow regimes in the Hawkesbury-Nepean, and emergency planning and upgraded evacuation routes. The BMCS will strongly campaign against raising the dam wall if the NSW government decides to proceed with it.

Summary of recommendations and suggested priorities for the finalised *West District Plan*

Productivity

- **The BMCS does not support the construction of the Western Sydney Airport.** We believe the Greater Sydney Commission's assumption that the airport will proceed is problematic, especially given the current uncertainties regarding the airport's financial viability. See Attachment 1
- Given the population profile of the Blue Mountains LGA, **the Greater Sydney Commission should consider investing in developing 'smart jobs', 'smart hubs' and 'smart industries' in the Blue Mountains.** This also aligns with the Greater Sydney Commission's vision of more people being able to access their jobs within 30 minutes of where they live.
- **The Greater Sydney Commission should seriously consider encouraging and supporting the establishment of university campuses in the Blue Mountains.** This would build on already existing partnerships between hotel schools and universities but the new campuses could specialise in environmental science, sustainability studies and sustainable tourism.
- The BMCS recommends that the Greater Sydney Commission, in partnership with the Blue Mountains City Council, undertake **a feasibility study for the Blue Mountains becoming a sustainable Green City** along the lines of Freiburg, Germany.
- **Managing freight transport across the Blue Mountains.** Action P10 needs to give serious attention to investigating alternative freight options e.g. moving road freight travelling between Sydney and Western NSW through the Blue Mountains on to rail. The Blue Mountains is being impacted by increasing road freight (which is predicted to double) and associated issues of highway safety, residents' amenity and environmental impact.

Liveability

- **Housing targets should not be based on unreliable and disputed population growth projections.** This 'predict and provide' approach seems contrary to the strategic planning approach of the Greater Sydney Commission and the *Draft West District Plan*.
- **The development of the Blue Mountains Local Housing Strategy should not be driven by a mandatory enforceable minimum housing target** but by consideration of local conditions as set out, for instance, in the current Local Environmental Plan and the town master plans (currently under development), and community consultation.
- **The BMCS rejects the idea of a 'transition area' of between 1 and 5 kms from transport/village centres that could be used for urban renewal; specifically, for medium density housing.** If meant to be applied to the Blue Mountains, this idea shows a lack of knowledge of local settlement patterns, bushfire risk, availability of essential infrastructure such as water and power, and topographic and environmental constraints that would militate against such development.

Sustainability

- **A buffer area around the perimeter of the Greater Blue Mountains World Heritage Area should be created and maintained** to protect and enhance biodiversity and stop feral animals (cats, foxes) and weeds from entering and degrading the WHA.
- The Society calls on the Commission to **negotiate a sensible replacement of the 10/50 bushfire clearance regulations** that have been responsible for dramatic loss of vegetation in some areas of the Blue Mountains. The 10/50 regulation is clearly an obstacle to the achievement of the *Draft West District Plan's* Sustainability Priority 4 which calls for the protection, enhancement and extension of urban canopy trees.
- **The finalised *West District Plan* should clearly distinguish between natural areas for environmental conservation and open space for recreation and tourism.** The BMCS proposes two designations:
 - 1) **Green Grid open space and open space corridors** which primarily provide recreational and social opportunities as well as providing some limited biodiversity outcomes
 - 2) **Biodiversity reserves and biodiversity corridors** whose primary objectives are biodiversity and environmental outcomes, as well as providing as a secondary purpose appropriate recreational and environmental outcomes.
- **The Society recommends including the following recreational walking and cycling facilities as Green Grid projects and allocating funds for their upgrade, maintenance or completion:** Grand Clifftop Walk, Woodford to Glenbrook via The Oaks Picnic Ground bicycle corridor, The Six Foot Track, Narrowneck Firetrail and the pedestrian route from southern Narrowneck to Dunphys Camp via Medlow Gap.
- **The BMCS recommends the creation of a Metropolitan Bushland Area designation for the Blue Mountains and similar areas as an alternative to the current Metropolitan Rural Area.** While the Metropolitan Rural Area designation is relevant for the Hawkesbury and Nepean LGAs, it is inappropriate for the Blue Mountains.

The proposed Metropolitan Bushland Area:

 - Applies to residential/commercial areas, including towns, villages, residential areas and tourist facilities which are predominantly surrounded by natural bushland and national parks.
 - Applies to areas that include not only the Blue Mountains, but parts of the Hawkesbury e.g. Bowen Mountain, parts of Sutherland Shire e.g. Bundeena, parts of the Wollondilly/Camden area and sections of Ku-ring-gai such as Brooklyn and Berowra.
- **A flood risk mitigation plan for the Nepean-Hawkesbury Valley should be developed which does not rely on raising Warragamba Dam wall.** Such a plan would be based on the application of strong flood related development controls based on current and predicted future flow regimes in the Hawkesbury-Nepean and emergency planning and upgraded evacuation routes. The expansion of housing and commercial activities onto the floodplain that the raising of Warragamba Dam would apparently allow is completely inconsistent with the aims of the *West Sydney District Plan* particularly with the development of the Strategic Conservation Plan for Western Sydney, the concept of the Green Grid and the management of the Metropolitan Rural Area.

General comments on the *Draft West District Plan*

- The Blue Mountains Conservation Society first of all commends the Greater Sydney Commission (GSC) and the West District Commissioner for their extensive community consultation on the *Draft West District Plan*.
- The BMCS also commends the Greater Sydney Commission for its commitment to ‘joined up’, integrated strategic planning and delivery, built on the principles of Ecologically Sustainable Development (ESD). However, we note the recent history of the state government’s attempts to replace the *Environmental Planning and Assessment Act (1979)* and replace the principle of ESD as defined in the *Protection of the Environment Administration Act 1991 No. 60* with a weaker definition of Sustainable Development. The proposed changes to the EPAA currently on exhibition will weaken the requirements to achieve ecologically sustainable development. We are therefore not convinced of the government’s ongoing commitment to ESD. We know that one of the Objectives of the Greater Sydney Commission is to promote the orderly development in the Greater Sydney Region with regard to the principles of ESD and understand that the principles underpin and are integrated throughout the discussion in the *Draft West District Plan* and other GSC documents. However, **we believe that it would be helpful if ESD is clearly defined in the District Plans.**
- The BMCS welcomes the GSC’s explicit recognition of the need to adapt to climate change and to work towards the *NSW Climate Change Policy’s* aspiration of zero net carbon emissions by 2050, and building this policy framework into local planning decisions. This is a welcome departure from the disabling and destructive ‘debate’ on climate change and subsequent climate policy vacuum at the federal government level. But recent reports showing increased carbon emissions in NSW reveals the weakness of policy so far and lack of guidance on how carbon reduction is to be addressed in strategic planning, development decisions, environmental impact assessment, compliance and enforcement (for a discussion on this see the NSW Environmental Defenders Office [Planning for Climate Change](#)). **The state government and GSC must seriously work to reduce carbon emissions in its planning for Greater Sydney by having clear targets, detailed strategies and monitoring.**
- The BMCS supports the work of the GSC’s Environmental Panel and the broad environmental directions in the *Environmental Panel Advisory Paper for the Greater Sydney Commission*. But we are very disappointed that the *Advisory Paper* did not address the environmental impacts of the proposed Western Sydney Airport on the South Creek catchment and the Greater Blue Mountains World Heritage Area. The environmental impacts on the proposed Airport should be included as a distinct issue as the Airport is the biggest infrastructure project in the region and if built will result in significant environmental impacts – in terms of both the airport itself and the surrounding resulting development (commercial, industrial, residential). It has been made clear that the GSC has no role in approving the airport but are proceeding on the basis it will get approval. See Attachment 1.
- Disappointingly, there is not much for the Blue Mountains LGA in the *Draft West District Plan*. While we are pleased that the Blue Mountains seems no longer to be regarded as a place for intensive outer-suburban development, in the *Draft Plan* at least, not much thought has been given to economic development apart for support for intensification of tourism and some purported spin-off benefits from the proposed Western Sydney Airport and ‘aerotropolis’. Both of these are problematic. Ideas for economic development are discussed in our submission.

- The BMCS does not support the ‘predict and provide’ approach to planning which underpins the development of *A Plan for Growing Sydney/Towards our Greater Sydney 2056* and District Plans, nor the mandated housing targets based on unreliable and disputed population projections. ‘Predict and provide’ seems to contradict the GSC’s stated strategic approach to planning and developing the District Plans and infrastructure priorities, which involves analysis and extensive community consultation. It also contradicts the Blue Mountains City Council’s town master planning process, currently underway, and the development of a Local Housing Strategy based on consideration of the constraints to development presented by the Blue Mountains environment as set out in the Blue Mountains LEP 2015, and extensive community consultation.
- In relation to the previous point, we are disturbed by what we see as a lack of coherence between some elements the *Draft West Sydney Plan* and state government Planning Policies and legislation, particularly relating to development controls and environmental protection. For example:
 - The Blue Mountains LGA is currently designated a Metropolitan Rural Area (MRA) where urban development is discouraged (see separate discussion on the inappropriateness of the MRA designation for the Blue Mountains). The Blue Mountains LGA has substantial areas of ‘R’ residential zoning around its iconic villages which makes it vulnerable to the DPE’s proposed changes to the SEPP (Exempt and Complying Development Codes) 2008. These changes would allow medium density housing as complying development in the ‘R’ zones which allow medium density housing (though which ‘R’ zones this will be allowed in is still unclear). This SEPP amendment is designed to fast-track residential development through by-passing council DA processes and LEP and DCP provisions. The imposition of these changes to the SEPP on the Blue Mountains LGA (unless it is exempted) seems to fly in the face of the GSC’s concern about urban development in the MRAs.
 - Biodiversity. We see here a disconnect between the GSC’s positive Priorities and Actions to enhance Biodiversity and the new Biodiversity Conservation Act which permits vegetation clearing with few regulatory limits, the Rural Fires Act which over-rides all other legislation and the 10/50 rule which is resulting in the loss of biodiversity due to the lack of regulation and monitoring, with total reliance on an ineffective ‘self-assessment’ regime.
 - Sustainability Priority 4 calls for protection, enhancement and extension of urban canopy trees. An obstacle to achieving this, particularly in places like the Blue Mountains and other bushland areas, is the 10/50 bushfire vegetation clearing regulations which have led to large areas of tree clearing in parts of the Blue Mountains.
- The BMCS is concerned by the statement in the *Draft District Plan Information Note 5: Priorities and Actions* that “Not all planning priorities and actions are endorsed by NSW Government policy or fully funded. They have been included in the draft District Plans on the basis of independent analysis by the Commission and through discussions with the relevant planning authority or State agency. In some cases their implementation will be subject to a business case”. Given the state government’s enthusiastic support for economic growth, we are concerned that this caveat could apply to the Sustainability Priorities and Actions in particular.
- This brings us to the question of what is the relationship between the District Plans and state government planning policies and legislation. We know that LEPs will be required to conform to the priorities, actions and targets in the finalised District Plans, but will SEPPs over-ride the District Plans? Clarification of the hierarchy of District Plans and state planning policies is of critical importance.

- The BMCS supports the vision and many of the priorities and actions in the *Draft West District Plan* relating to ‘A Sustainable City’, and the key environmental issues and many of their ‘solutions’ in the *Environmental Panel Advisory Paper for the Greater Sydney Commission*. But while metrics for measuring progress on these key environmental issues are presented in the *Advisory Paper*, we are unclear on how the ‘solutions’ are to be implemented in planning and legislation and what the mechanisms are for their enactment in LEPs. This is particularly concerning given the apparent lack of endorsement by the NSW government for all the Priorities and Actions and the weaker compliance test (‘have regard to’) in the Standard Instrument LEP format which could render any positive measures unenforceable. However, we understand that an implementation plan for the Actions in the *West District Plan* – containing targets, outcomes, timeframes, delivery agencies, monitoring, reporting, accountabilities etc – will be developed as part of finalising the District Plans, but if the implementation plan only relates to infrastructure delivery this is a great weakness. We need implementation measures, funding commitments, objectives, deliverables and timetables for all the *Plan’s* Priorities and Actions.

A comment on the West District profile

The Greater Sydney Commission’s *Draft West District Plan* (p.12) states that the Districts represent neighbouring groups of council areas with similar features and common communities of interest. This might be so for some of the Districts closer to Sydney but not in the case of the West District.

The Blue Mountains Conservation Society rejects this characterisation of the West District as being internally homogenous. The aggregated statistics used to construct a profile of the West District misrepresent the widely diverse LGAs within this district – the West District is a grouping of geographical convenience rather than a grouping of LGAs with similar features and common communities of interest.

Diversity is to be expected given the size of the West District. It is the largest District, geographically, covering emerging major urban and industrial areas such as Penrith and the planned ‘aerotropolis’ around the proposed Western Sydney Airport, large agricultural areas in the Hawkesbury and Penrith LGAs, and a city uniquely located within a World Heritage listed national park, the City of Blue Mountains. Seventy per cent of the Blue Mountains LGA is incorporated into the World Heritage Blue Mountains National Park. Further, unlike other LGAs in Greater Sydney, most of the Blue Mountains population is spread out along a narrow strip some 70km long, with the Grose Valley separating the residents in Bell and ‘The Mounts’ from the rest of the City.

The Society believes that the aggregate West District profile is a poor basis for generating Priorities and Actions that will influence planning and public and private investment decisions for the Blue Mountains. Throughout this submission the Blue Mountains Conservation Society will challenge the profile of the West District as an accurate representation of the Blue Mountains LGA through disaggregating the statistics and presenting a profile of each LGA within the West District, using the same data set as in the *Draft West District Plan* (the 2011 Census). Throughout our discussion, we will consider the implications of this disaggregation for planning and investment in the Blue Mountains LGA.

Specific comments on the *Draft West District Plan*

Chapter 3. A productive city

As previously indicated, in our response to the *Plan* we will disaggregate the demographic statistics in order to get a more accurate picture of the Blue Mountains LGA and consider the implications for planning and investment.

The discussion below relates to:

- 3.1 *The West District's economy,*
- 3.1.2 *Economic opportunities,*
- 3.1.3 *District priorities,*
- 3.3 *Building international tourism, Action P3: Develop infrastructure to support the growth of the visitor economy, Productivity Priority 2: Support the visitor economy*
- 3.4 *Planning for job target ranges for strategic and district centres*
- 3.6 *Increasing, strengthening and diversifying the skill base, Action P9: Encourage opportunities for new Smart Work Hubs*
- 3.8 *Accessing local jobs, goods and services within 30 minutes*
- 3.10 *Managing employment and urban services land, Productivity Priority 4: Protect and support employment and urban services land, Action P11: Develop better understanding of the value and operation of employment and urban services land*

First, a comparison of the **population** of the 3 LGAs within the West District.

Table 1. 2011 Census. Population.

Blue Mountains LGA	Penrith LGA	Hawkesbury
75,942	178,467	62,353

The Penrith LGA dwarfs the other 2 LGAs in the West District in terms of population.

Education levels

By necessity, the educational statistics used to create a profile of the West District are an aggregate of the 3 LGAs. On this basis the West District is compared with the aggregate 'Greater Sydney' to show that residents in the West District have substantially lower levels of higher education qualifications compared to that of the population of Greater Sydney. These statistics are used to "illustrate the need to increase the District's skilled workforce in order to grow the proportion of smart jobs in the District" (p.53).

The Blue Mountains Conservation Society called on expert advisors with access to the 2011 Census database to help disaggregate the statistics on educational qualifications and make sense of the statistics in the *Draft West District Plan*. We were unsuccessful in aligning our results with the *Draft West District Plan* and the statistics appearing on the 3 Council websites. The table below compares statistics from various sources, though they are all derived from the 2011 Census.

First we note that there are five categories of post-school education qualifications identified in the 2011 Census¹:

¹ Bachelor and higher degree should refer to the first 3 categories; Bachelor and Postgraduate degrees only could refer to categories 1 and 3; Tertiary education certainly refers to the first 3 categories but might include categories 4 or 5 as well

1. Postgraduate degrees
2. Graduate diplomas and graduate certificates
3. Bachelor degrees
4. Advanced diplomas and diplomas
5. Certificates

Table 2. 2011 Census. Higher education across the 3 LGAs, West District and Greater Sydney

Location	Blue Mtns LGA %	Penrith LGA %	Hawkesbury LGA %	West District %	Greater Sydney %
Source					
<i>Draft West District Plan</i> p.53, 70 % Higher education. Population base NS Note: it is unclear if Diplomas and Certificates refer to vocational or postgraduate level qualifications (presumably vocational)				14 (Bachelor or Postgraduate degree only) or 49 (if include Diploma or Certificate)	27 (Bachelor or Postgraduate degree only) or 55 (if include Diploma or Certificate)
<i>West District Liveability Profile</i> p.9. % Tertiary education. Population base NS	35-45	15-35	15-35		
Blue Mountains Conservation Society. Higher education. Includes Graduate Diplomas and Certificates % population age 15 and over	37.1	21.0	20.7		
Blue Mountains Conservation Society. Higher Education. Includes Bachelor & Postgraduate Degrees only (excludes graduate diplomas & certificates) % population age 15 and over	32.8	19.3	18.7		
Blue Mountains Conservation Society Degree or higher % for total population	19.4	8.3	9		
Individual Council websites. Bachelor or Higher Degree % population age 15 and over	24.2	10.6	11.5		24.1
Blue Mountains Economic Enterprise ² . Tertiary qualifications % population age 15 and over	24.1 (Bachelor or Higher degree only) 34.8 (total tertiary qualified)				24.1 (Bachelor or Higher degree only) 33.1 (total tertiary qualified)

The figures above from the different sources vary widely. Variables include what population base is counted (total population or population age 15 years and older, population with education 'not stated' included or excluded) and what higher educational qualification is included in the count (bachelor degree and/or postgraduate degree and/or graduate diplomas/certificates). Apart from the Blue Mountains Conservation Society's figures, we cannot know how these statistics were calculated. However, the statistics on the Blue Mountains, Penrith and Hawkesbury Council websites were prepared by the same company using the same methodology. This is apparent in the same figure for Greater Sydney (24.1% of population age 15 and over with Bachelor or Higher Degree) appearing on all 3 Council websites, making the individual Council figures directly comparable to each other.

Rather than try and reconcile these disparate figures, what we wish to highlight is that **the Blue Mountains LGA consistently has a substantially higher number of residents with higher education qualifications than Penrith and Hawkesbury LGAs whichever way you count it**. The lower population in the Blue Mountains relative to the combined population of the 2 other LGAs skews the aggregate figure for the West District in favour of the lower educational attainment of

² Blue Mountains Economic Enterprise (2014) *Blue Mountains Demographic and Economic Profile*, p.12.

residents in the Penrith and Hawkesbury LGAs. On the Councils' and Blue Mountains Economic Enterprise's figures the Blue Mountains LGA is on a par with Greater Sydney in terms of Bachelor or Higher Degree qualifications. Further, on our calculations, the Blue Mountains LGA is more comparable to the Central District, 37% of whose residents have a Bachelor or above degree³.

The point we wish to make is that **the Blue Mountains is a well-educated community by comparison with the other LGAs in the district**. If the Blue Mountains already 'matches' Greater Sydney and even Central Sydney in terms of the educational qualifications of its residents, then it seems inappropriate, for the Blue Mountains LGA at least, to be calling for a need to increase the skilled workforce in order to grow the proportion of smart jobs. In thinking about economic development in the Blue Mountains, we should start with the recognition that we already have a skilled workforce and support the development of 'smart jobs', 'smart hubs' and 'smart industries' in the Blue Mountains, not more low-skilled, low-paid jobs that tend to characterise the hospitality/tourism industry.

Implications for priorities and actions in the West District Plan:

- The Greater Sydney Commission should consider investing in developing 'smart jobs', 'smart hubs' and 'smart industries' in the Blue Mountains – not just Penrith. The Lawson and Katoomba industrial areas/employment lands could be given a major boost through such an initiative. This also aligns with the Greater Sydney Commission's vision of more people being able to access their jobs within 30 minutes of where they live.
- Further, there has been talk for many years of establishing a university campus in the Blue Mountains where there is already a large TAFE college which has for many years provided courses in Outdoor Recreation, Conservation and Land Management, Natural Area Restoration, Tourism and Hospitality. Encouragement and support for new university campuses specialising in environmental science, sustainability studies and sustainable tourism for local, regional and international students builds on already existing partnerships between local hotel schools and universities and aligns with our idea of a Blue Mountains 'Green City'. The Blue Mountains offers a perfect location for sustainability-related study and research. For example, the Blue Mountains World Heritage Institute is based at the University of NSW.

Employment profile by sector in the 3 LGAs in the West District vs Greater Sydney (2011 Census)

The higher educational qualifications held by Blue Mountains residents are reflected in the dominant industries of employment and occupations.

Table 3. 2011 Census. Industry of Employment, top 5 responses (employed people 15 years and over)

Industry	Blue Mountains LGA %	Penrith LGA % (Compared to Blue Mts)	Hawkesbury LGA % (Compared to Blue Mts)
School education	8.5	4.2	4.8
Hospitals	3.9	3.1	Not in Hawkesbury top 5
Tertiary education	3.7	Not in Penrith top 5	Not in Hawkesbury top 5
Cafes, restaurants and takeaway food services	3.4	3.6	3.2
Residential care services	2.5	Not in Penrith top 5	Not in Hawkesbury top 5

³ Greater Sydney Commission *Liveability Profile for Central District*.

Or, a different presentation of the figures:

Table 4. 2011 Census. From the 3 Councils' websites, top 3 industry sectors of employment (same company, same methodology, same database therefore directly comparable). Percentage of employed persons aged 15 years and over.

Industry	Blue Mountains LGA %	Penrith LGA % (Compared to Blue Mts)	Hawkesbury LGA % (Compared to Blue Mts)
Education and training	14.7	Not in Penrith top 3	Not in Hawkesbury top 3
Health care and social assistance	14.7	10.2	Not in Hawkesbury top 3
Retail trade	9.2	11.4	10.4

Just on 30% of employed persons in the Blue Mountains work in the Education and training, and health care and social assistance sectors. Many Blue Mountains residents working in the education/training and health care sectors would be working in local schools and health services, and travelling to the Penrith health and education precincts.

For those Blue Mountains residents working in the Blue Mountains LGA, Health and Social Assistance provide the greatest number of local jobs (17.5%), followed by Retail Trade (12.2%), Tourism (11.8%) and Education and Training (11.6%)⁴.

Occupation

Table 5. 2011 Census. Occupation. Percentage of employed persons aged 15 years and over (concur with data on the 3 Councils' websites)

Occupation	Blue Mountains LGA %	Penrith LGA %	Hawkesbury LGA %	Greater Sydney % ⁵
Managers	12.0	10.1	12.6	13.3
Professionals	28.8	13.9	15.2	25.5
Technical and trades	13.2	15.2	18.8	12.2
Community and personal service	11.4	9.7	9.6	8.8
Clerical and administrative	14.3	19.1	15.4	16.2
Sales	7.7	9.9	8.9	9.0

The Blue Mountains LGA has substantially more professionals than Penrith and Hawkesbury, and more than the Greater Sydney percentage.

The *Draft West District Plan's* focus on providing education and health-related jobs in Penrith (the health and education 'super-precinct') and tourism-related jobs in the Blue Mountains seems to counter the industry and occupation profile of Blue Mountains residents, even if tourism provides the second-greatest number of jobs to those living and working in the Blue Mountains LGA.

Implications of employment by sector and occupation profile

Given that just on 30% of the working population of the Blue Mountains is employed in the education and health care industries, it would seem that the proposal for a Penrith health and education 'super precinct' (p. 45 *Draft West District Plan*) would create greater employment opportunities in more highly skilled and higher paying jobs in these sectors for Blue Mountains residents than in the local tourism industry.

⁴ 2015-16 ABS Tourism Satellite Account figures on Blue Mountains Economic Enterprise (BMEE) website.

⁵ Figures from the 3 council websites.

Socio-Economic advantage profile

It is partly because of the number of professionals and residents with tertiary qualifications that the Blue Mountains LGA is identified as ‘significantly advantaged’ in the 2011 Index of Relative Socio-economic Advantage and Disadvantage⁶, and ranked in the top 30 of the 152 LGAs in NSW in socio-economic advantage, outranking Penrith, Hawkesbury and Parramatta LGAs (ABS 2011 SEIFA Index).

Age profile

Table 6. 2011 Census. Age.

	Blue Mountains LGA	Penrith LGA	Hawkesbury LGA
% of people over 65	15.7%	9.7%	11.7%

The Blue Mountains LGA has an older age profile than the other 2 LGAs in the West District.

Conclusion

From this disaggregation of the West District into constituent LGA profiles, in comparison with the Penrith and Hawkesbury LGAs the Blue Mountains LGA has:

- a more highly educated population
- more professionals
- more residents employed in the health and education sectors
- a higher ranking in socio-economic advantage (9th percentile, in top 30 of the 152 LGAs in NSW)
- an older age profile

This profile of the Blue Mountains should form the basis for generating appropriate priorities and actions that will influence planning and public and private investment decisions in the LGA.

Economic development in the Blue Mountains

It is inaccurate to claim (as could be inferred from statements on p.32 of the *Draft Plan*) that tourism is the major driver of the West District’s economy. Even in the Blue Mountains, tourism comes third in terms of industry of employment of local residents. The *Draft Plan*’s enthusiastic endorsement of tourism intensification needs to be tempered by consideration of potential negative impacts which aren’t adequately recognised.

The Blue Mountains LGA has a unique status as a city within a World Heritage Area. While this status is capitalised on in conventional tourism, the Blue Mountains Conservation Society believes that not enough attention is paid to the implications of such status: that the responsibility on all levels of government to ensure that the World Heritage Area is managed with care and diligence (Ministers’ Foreword to *Greater Blue Mountains World Heritage Area Strategic Plan 2009*) means that economic (including tourist) and residential development on the ridgeline above the World Heritage Area must not adversely impact on and pose threats to World Heritage values. Indeed the *GBMWhA Strategic Plan* identifies one such threat as “inappropriate recreation and tourism activities, including the development of tourism infrastructure, under increasing visitor pressure from Australian, overseas and

⁶ Blue Mountains Economic Enterprise (2014) *Blue Mountains Demographic and Economic Profile*, p.12.

commercial ventures” and another as “lack of understanding of heritage values” (p.23). Tourism and other development in the Blue Mountains must be environmentally sustainable. Further, the *GBMWhA Strategic Plan* states that there is “some concern that benefits will not be evenly spread, that larger business interests may dominate at the expense of both Aboriginal tourism enterprises and smaller, locally based and more eco-oriented tourism enterprises and that a high turnover in tourism and hospitality operators (due to business failures) may be detrimental to the quality of visitor services” (p.36).

The Blue Mountains Conservation Society shares these concerns. It is clear in the Blue Mountains City Council’s commissioned *Strategic Tourism and Recreation Planning Study* (the Stafford Report, 2011) that the desire of large tourism and hotel operators is to develop large-scale, top-end resorts on or near the escarpment areas on sites adjacent to the World Heritage Area (see the Stafford Report for a list of targeted sites), taking commercial advantage of the views from the resort but blighting the view of the escarpment for other visitors and bushwalkers in the World Heritage Area. Indeed the *GBMWhA Strategic Plan* is concerned about incompatible development at the GBMWhA’s boundary: “Scenic values can be compromised by inappropriate developments in prominent locations adjoining the area. Properties adjoining the GBMWhA with prominent vantage points are highly valued and under pressure for residential and tourist development. Such development has the potential to diminish the scenic value for others” (p.33). Yet approval for large tourist developments right on the escarpment continues. This kind of development is unacceptable to the Blue Mountains Conservation Society because of its impact on the integrity of views of the escarpment and other environmental impacts.

The emphasis in the *Draft West District Plan* seems solely on promoting international tourist visitation of the conventional kind and providing funds for infrastructure to support such growth. What this infrastructure consists of is not clear. We already have major problems with congestion and inadequate car and bus parking in popular areas like Katoomba and Leura. **Infrastructure provision should also include increased funding to the NSW NPWS** for appropriate levels of staff to manage the increased numbers of tourists, undertake track upgrades and maintenance and weed management, provide signage and interpretation material.

The conventional kind of tourism that seems to be supported in the *Draft West District Plan* is unimaginative and vulnerable to downturns related to the state of the world economy and currency exchange rates, and bushfires that can shut down the tourism sector short-term or longer. The Blue Mountains Conservation Society supports diversity in tourism and accommodation offerings that are well integrated into the local economy and community. Apart from tourism of the conventional kind, the Blue Mountains is also a popular destination for wellbeing-related ‘escapes’ with its myriad relaxation, meditation and alternative health offerings. There is also a long-standing successful nature tourism sector focussed on bushwalking, guided tours in the spectacular World Heritage Area and birdwatching excursions, for example. There needs to be greater recognition of the contribution of the already established nature-based tourism sector to the Blue Mountains economy.

It is these kinds of activities, relating to nature tourism and conservation, sustainability, and cultural and environmental education that we believe should be given more recognition and support in the finalised *West District Plan*.

The Blue Mountains Conservation Society supports diversity in Blue Mountains tourism

The Blue Mountains LGA, as a city in a World Heritage Area, is uniquely placed to develop ‘sustainability’ and ‘world’s best practice’ as a focus for tourism and economic development. The Blue Mountains already hosts some small, locally-based nature, Indigenous and sustainability-related retail, tourist and educational businesses and organisations.

Table 7. Some Blue Mountains commercial businesses or non-profit groups and organisations involved in cultural, nature or sustainability-related tourism and/or education

Group	Activities/ Achievements
Australian School of Mountaineering	Offers a range of guided tours and technical courses
Blue Mountains Adventure Company	Guided tours specialising in abseiling and canyoning
Blue Mountains Bushcare and Landcare	Over 500 volunteers in more than 60 groups involved in bush/land restoration, training and education
Blue Mountains Conservation Society	Conducts educational activities and events (e.g. bat night, sustainability-related expos etc) and produces associated educational materials. Activities include a bushwalking program
Blue Mountains Food Co-op	Sells certified organic and biodynamic fresh fruit and vegetables, chemical free local produce, bulk wholefoods and eco-friendly cleaning products. Runs educational workshops and activities
Blue Mountains Nature (website)	Presents an engaging and comprehensive collection of information on the flora, fauna, landscape and geology of the Greater Blue Mountains
Blue Mountains Permaculture Institute and Blue Mountains Organic Community Gardens	Trains local and international students in Permaculture agriculture
Blue Mountains World Heritage Institute	Conducts World Heritage-related research and has developed a series of short video clips for self-guided nature walks along the Grand Clifftop Walk in Katoomba
Catchment Coordinating committees/groups	These are community partnerships with local government and state agencies. One of these groups, the Govetts/Katoomba Creek group which has been operating for 14 years, has achieved significant outcomes to protect the WHA from weed infestation and sedimentation
Food production – separate small farms and food producers including: Epicurean Harvest Kedumba Urban Farm Carrington Boutique Brewery Blackheath Community Farm Springwood Community Farm	Reduce food miles and provide unique food experiences
Glenbrook Native Plant Reserve and Nursery	Native plant sales and educational activities e.g. open days
Muggadah Indigenous Tours	Guided tours focusing on Gundungurra culture and local history, geology, flora and fauna
Littleton Stores	Sale of and workshops on organic food
Mid-mountains community garden	Engages people in permaculture & sells produce at Magpie markets
NSW National Parks and Wildlife Service	Provides information centres at Glenbrook and Blackheath relating to nature tourism (walks) and the World Heritage Area
Seed savers BM	Keeps supplies of heritage vegetable seeds
Slow Food Blue Mountains/Cittaslow	SFBM is part of a global movement across 132 countries that is comprised of non-profit, eco-gastronomic member-supported organisations. Offers grants to small, sustainable start-up food producers Offers tours of eco-houses
Tread Lightly Eco Tours	Accredited interpretive guided tours in the Blue Mountains World Heritage area
Wildplant Rescue	Collects native plants from blocks that are being developed for sale and replanting. Also breeds local native plants for revegetation

The Blue Mountains Conservation Society supports a diversified, sustainable and sustainability-focused tourism industry in the Blue Mountains. This aligns with the Draft West District Plan's:

- Action P3: diversify tourism opportunities by building on current experiences such as local food produce, heritage (including the five-villages tourist trail) and farm stays
- Productivity Priority 2: In preparing local environmental plans, councils should allow for a variety of tourism opportunities associated with the District's environmental, arts and cultural heritage and agricultural assets.

But we also believe that the Blue Mountains economy should be more diverse and that sustainability-related businesses and industries should be encouraged and supported.

The Blue Mountains Conservation Society supports a diversified and resilient Blue Mountains economy

Key Direction 5: Sustainable Economy Values, Aspirations & Aims

We value business and industries that are in harmony with our surrounding World Heritage environment. We are recognised as a Centre of Excellence for sustainability that strives to create significant employment and educational opportunities.

Through responsible economic development we have strengthened and diversified our local economy. We are a leader in sustainable business and industry. Young people are attracted to work, live and study in the Blue Mountains.

Sustainable Blue Mountains 2025. Community Strategic Plan, p.71

The Blue Mountains Conservation Society concurs with this vision of the Blue Mountains in 2025 and is disappointed that these aspirations and aims seem not to be reflected in the *Draft West District Plan*. There is plenty of discussion in the *Plan* about the need to generate ‘knowledge-intensive jobs’, or ‘smart’ jobs and industries, in the West District but it seems the only vision for economic development in the Blue Mountains, apart from the proposed Western Sydney Airport, is for increased international tourism of the conventional kind. This does a dis-service to the Blue Mountains community.

To reiterate, the Blue Mountains LGA has a unique status as a city in a World Heritage Area. With proper support it could become a hub of innovative, sustainability-related businesses and creative arts, and sustainability-related research and educational centres. These would generate local jobs and educational opportunities, and wider interest and visitation. Given our previous discussion about a ‘smart’ Blue Mountains population requiring local ‘smart’ jobs and ‘knowledge-intensive’ industries, it is not surprising that some start-ups and innovative sustainability-related businesses and not-for-profits have already emerged.

Table 8. Some sustainability-related businesses or not-for-profits in the Blue Mountains

Group or business	Activities
2000FT Design	A design practice providing bespoke residential and interior design solutions using passive solar and sustainable design principles and <i>strategic adaptive reuse</i> of existing building fabric
Bike Storage	Designs, supplies and/or installs compliant and visually aesthetic bicycle infrastructure
Blue Mountains Living lab	A virtual innovation 'community of practice' that seeks to profile and connect up innovative projects which serve the community of the Blue Mountains. Promotes social and environmental innovation
Blue Mountains Renew	Promotes renewable energy use in the mountains eg bulk buy of batteries and solar panels , raising money for solar for not-for-profit community organisations
Clean Up Crew	Sustainable waste management system for events & festivals After Winter Magic there was zero waste in the gross pollutant trap for stormwater at the base of Katoomba St
Cooperative Research Centre for low carbon living / tourism (Blue Mountains project)	Audits businesses sustainability and advises on how to increase it – awards stars
Earth Recovery and Junction 142 food recycling initiative	Collects food from grocers and cafes and distributes to those who need it

With a strong environmental awareness amongst Blue Mountains residents, the will and interest to develop local, innovative, sustainability-related businesses is already there – it just takes more investment and support from all levels of government.

The Blue Mountains Conservation Society concurs with the view that has been around for a long time that the industrial/employment lands in Lawson and Katoomba could, with imagination and investment, be turned into an ‘innovation hub’ specialising in sustainability-related businesses and

industries e.g. renewable energy, sustainable eco-building companies, water conservation and other eco-system designers.

If these seem like pie in the sky ideas, we offer the example (below) of the city of Freiburg, Germany, where environmental policy, solar technology, sustainability and climate protection have become the drivers of economic growth.

The Freiburg Green City and Future Lab

Freiburg is a city in south-west Germany with a population of about 220,000. It is a regional tourist hub because of its proximity to the Black Forest but it is also known for its advanced environmental practices and exemplary sustainable urbanism which has attracted solar and other innovative industries, and education and research facilities. It aspires to become carbon/climate neutral by 2050.

Freiburg features 2 ‘ecological districts’ which attract visitors because of low energy housing design, passive and active solar power, experimental architecture and innovative urban planning. Freiburg has also become headquarters to several sustainability-related organisations and hosts the Future Lab, a knowledge-intensive hub of engineers, architects, planners and communications specialists who offer advice and tours to international visitors wishing to introduce sustainable urban development in their own communities. The city regularly hosts international sustainability trade fairs and conferences.

Importantly, the Freiburg experiment began with grassroots community activism and today strong community support and participation are central to its ongoing success. See https://www.freiburg.de/pb/site/Freiburg/get/params_E1209026602/640888/Green-City-Brochure_English.pdf

Conclusion

The Blue Mountains Conservation Society reiterates its support for a diverse tourism industry based on sustainability principles and on a scale appropriate to the Blue Mountains’ location in a World Heritage Area. The Society also supports diversifying the Blue Mountains economy, as in the example of emerging local sustainability-related ‘smart’ jobs and businesses, and the more longstanding sustainability activities such as community gardens, co-ops, recycling, nature conservation and nature tourism. A lot more could be done to support these sectors.

The Blue Mountains Conservation Society believes that the ideas offered in the discussion above conform to the *Sustainable Blue Mountains 2025. Community Strategic Plan* and several of the *Draft West District Plan’s* Productivity and Sustainability Priorities and Actions:

- Productivity Priority 3: Manage growth and change in strategic and district centres [e.g. Katoomba], and, as relevant, local centres [e.g. Lawson]
- Productivity Action P9: Encourage opportunities for new Smart Work Hubs
- 3.8 Accessing local jobs, goods and services within 30 minutes
- Productivity Priority 4: Protect and support employment and urban services land; Action P11: Develop better understanding of the value and operation of employment and urban services land
- Sustainability Priority 9: Support opportunities for District Waste Management and Action S9 Identify land for future waste use and recycling, particularly the idea of “introducing innovative precinct-based waste collection, reuse and recycling” (p.134).
- Measures that will support 5.7.2 Cost effective initiatives in energy and water use efficiency and carbon emission reductions (p.134); Action S11 Support the development of initiatives for a sustainable low carbon future (p.135).

- Sustainability Action S10: Embed the NSW Climate Change Policy Framework into local planning decisions (p.135).

The Blue Mountains LGA could be at the forefront of sustainability initiatives to protect the World Heritage Area and our environment. The Blue Mountains Conservation Society believes that the Greater Sydney Commission needs to be bolder in its vision for ‘A Sustainable City’ and move forward urgently with bold sustainability initiatives. **Accordingly, we call on the Greater Sydney Commission and Blue Mountains City Council to undertake a feasibility study on the City of Blue Mountains becoming a Green City, following the example of Freiburg.**

3.9 Managing Freight Activities (p.58).

A contentious issue in the Blue Mountains is increasing road freight and its negative impact on highway safety, residents’ amenity and the environment. With road freight forecast to double on the Great Western Highway by 2031, Action P10 needs to give serious attention to investigating alternative freight options e.g. moving freight travelling between Sydney and Western NSW through the Blue Mountains on to rail.

Chapter 4. A liveable city

The discussion below relates to:

- 4.2 Liveability priorities
- 4.3 Improve housing choice
 - 4.3.1 Prepare local housing strategies
 - 4.3.3 Deliver West District’s five-year housing supply target; Liveability Priority 1: Deliver West District’s five-year housing targets
 - 4.3.4 Establish West District’s 20-year strategic targets; Action L2: Identify the opportunities to create the capacity to deliver 20-year strategic housing supply targets
 - 4.3.5 Create housing capacity in the West District; Liveability Action L3: Councils to increase housing capacity across the District
- 4.4 Improve housing diversity and affordability
 - 4.6.3 Enhance walking and cycling connections; Liveability Priority 6: Facilitate enhanced walking and cycling connections

Population growth and housing

West District

The projected population growth for the West District has been revised downward by some 20,000 people from the 2015 *Draft West Sub-regional Plan* to the 2016 *Draft West District Plan*. In the 2015 *Draft West Sub-regional Plan* 111,850 additional people were predicted to live in the region over the 20 years from 2011 to 2031, requiring 50,950 new homes. In the 2016 *Draft West District Plan* (p.68) the District’s projected population growth for the 20 years from 2016 to 2036 is lower: a population growth of 91,100 requiring 41,500 additional dwellings.

This downward estimate for 2016-2036 is possibly the result of the three West District LGA Councils’ representations to the Department of Planning and Environment disputing the Department’s 2014 projections and requesting a review of the population and dwelling projections (joint letter to DPE 11th June 2015, in Blue Mountains City Council Business Papers, 18 August 2015). The projections contained in the *Draft Metropolitan Plan for Sydney* and 2015 *Draft West Sub-regional Plan* have been superseded in the *Draft West District Plan* by the Department of Planning and Environment’s 2016 *New South Wales State and Local Government Area Population Projections*

though, confusingly, the *West District Demographic and Economic Characteristics* document accompanying the current *Draft West District Plan* still cites the old 2014 projections, including the projected population growth of 111,850 between 2011 and 2031.

Blue Mountains LGA

We present in table form below the estimated/projected population growth in the Blue Mountains LGA from various sources. Population growth projections have been a particular point of contention between the Department of Planning & Environment and the Blue Mountains City Council. These projections are of critical importance because they form the basis for the mandatory enforceable housing targets.

Table 9. Blue Mountains projected population, 2011-2031 and 2016-2036

Source	Population 2011	Population 2031	Additional people
Dpt Planning & Environment 2014 Population and dwelling projections (BM Council Business Papers August 2015)	78,550	97,300	18,750
Blue Mountains City Council forecast (website Population Summary)	78,553	81,383	2,830
Source	Population 2016	Population 2036	Additional people
Dpt Planning & Environment 2016 LGA population projections (Dpt website) – Low series	81,550	84,300	2,750
Dpt Planning & Environment 2016 LGA population projections (Dpt website) – Main series	82,000	90,400	8,400*
Dpt Planning & Environment 2016 LGA population projections (Dpt website) – High series	82,550	96,250	13,700
GSC <i>Draft West District Plan</i> p.68	Not given	Not given	8,450*
Blue Mountains City Council population forecast and population summary (website)	78,802	82,869	4,067

* Because these 2 figures are very similar, it seems that the *Draft West District Plan* draws on the 2016 mid-range projections of the Department of Planning and Environment. This is confirmed on p.78 of the *Draft Plan*.

The points we wish to make here are:

- Population growth estimates and projections are highly variable and revisable.
- The Blue Mountains City Council’s population projections are consistently below the range of the Department’s population growth projections (except for the DPE’s Low series which has a different population base in 2016) so there is a disconnect between the Department’s and Council’s projections.

It seems that population and housing projections are a moveable feast, based on a range of assumptions and whoever is producing them. Even if by definition they cannot accurately predict the future, the Department’s population growth projections form the basis of mandatory enforceable minimum housing targets. **The Society objects to applying housing targets based on population projections that are so variable and unreliable, and without any consideration for housing supply constraints due to local conditions and the additional associated infrastructure that would be required.**

Housing Targets

The *Draft West District Plan* sets a mandatory minimum 20-year housing target for the West District of 41,500 from 2016 to 2036. This is a decrease of some 10,000 from the previous West Subregion 20-year housing target, based on revised population projections. In the *Draft West District Plan*, the 5-year housing target to 2021 for the West District as a whole is 8,400.

Table 10. Housing targets for West Subregion/District

Source	Population increase	Housing target	Comments
<i>Draft West Subregion Plan 2015 (Metro Plan)</i>	111,850 (2011-2031)	50,950 (2031)	The proportion of population increase to new dwellings is roughly equivalent across these 2 plans
<i>Draft West District Plan 2016</i>	91,500 (2016-2036)	41,500 (2036)	

Within the West District, the Blue Mountains LGA's 5-year housing target is 650, or 7.7% of the West District's 5-year target.

Table 11. Housing targets for Blue Mountains LGA

Source	Projected population increase 2011-2031	Projected additional households requiring additional dwellings 2011-2031	
Dpt Planning & Environment. Blue Mountains Area Population, Household and Dwelling Projections 2014	18,750	9,100 households/ 10,300 dwellings	
Source	Projected population increase 2016-2036	Total housing target (2016-2036)	5-year mandatory housing target (2016-2021)
<i>Draft West District Plan 2016</i> Note: no housing targets for 2036 for individual LGAs are given in the <i>Plan</i> .	Blue Mountains LGA: 8,450	Not stated in <i>Plan</i> but would be 3,195 if 7.7% proportion of 5-year target is maintained; or 3,832 if proportional to population increase, or 4,614 based on DPE 2014 projection proportions	650 (7.7% of the 5-year housing target for West District of 8,400)
Blue Mountains City Council Population Projection and Summary (website)	4,067	No target but would be approx. 1,844 on proportionality principle in <i>Draft West District Plan</i> or 2,980 based on Council's 10-year average 149 house approvals per year	

The 5-year target of 650 new dwellings in the Blue Mountains LGA translates to an average 130 new dwellings a year. This is probably achievable given that the 10-year average for residential approvals in the Blue Mountains is 149 per year, though over the past 2 years, residential approvals have gone up to over 200 per year (Blue Mountains City Council website).

However, it is apparent that the housing targets will have to escalate after 2021 in order to meet the 2036 target. If 8,400 of the 41,500 total housing target for the West District as a whole is to be achieved in the next 5 years, then the target for the following 15 years will have to be 33,100. While there is no target set for the Blue Mountains LGA for 2036, and we can't be certain how the 15-year target will be distributed between the 3 LGAs, if the Blue Mountains bears the same proportion of the District's housing target as it does in the 5-year target (7.7%), the implicit target for the Blue Mountains over the 15 year period from 2021 to 2036 will be 2,549 new houses/dwellings, or an average of 170 per year. This is well above the 10-year average of 149 house approvals per year or the surmised housing growth based on Council's population projections. While the implicit housing target for the Blue Mountains for the 20 year period 2016-2036 (3,195) is a huge reduction on the DPE's controversial 2014 population and dwelling projections for the 20 year period 2011-2031 (18,000 more people and 10,000 new dwellings) which informed the 2015 *Draft West Subregion Plan*, how would the presumed 2036 target in the *Draft West District Plan* be achieved?

The *Addendum* to the Blue Mountains City Council's *Residential Development Strategy 2010* identified residential land supply under the existing Local Environmental Plans. Constraints on residential land supply and the realisation of all subdivision potential – based on environmental, fire risk, quality of life, and service and infrastructure factors – led to the identification of an **upper limit of 4,045** land parcels available for residential development, mainly in the upper mountains. Six years

later, there'd be fewer lots available, but the Council anticipated that this land supply would provide sufficient land for residential development well beyond 2031 based on their population projections and the annual rate of new dwelling approvals at the time of the analysis.

Meeting the *Draft West District Plan's* implied mandatory housing target of 3,195 for 2036 would likely exhaust all available land supply for residential development in the Blue Mountains and perhaps could only be achieved through subdivision or more medium density development and dual occupancy around the mountains villages. Further subdivision as a way to meet housing targets based on uncertain population projections is unacceptable and greater development on the bushland fringes would also put considerable strain on the environment, including the Greater Blue Mountains World Heritage Area. While there may be limited yield realised through medium density residential development in the immediate vicinity of the village centres, separate houses dominate residential development types in the Blue Mountains compared to Greater Sydney. Subdivision and medium density housing in the iconic villages of the Blue Mountains would change the character and ambience of these towns significantly, and would put considerable strain on Council and NSW government services and infrastructure such as water, sewage, roads and trains. People don't move to the Blue Mountains to live in medium density housing complexes.

The Blue Mountains Conservation Society rejects the idea on p.84 of the *Draft West District Plan* of a 'transition area' of between 1 and 5 kms from transport/village centres that could be used for urban renewal; specifically, for medium density housing. This idea is totally inappropriate for the Blue Mountains and shows a remarkable lack of knowledge by the GSC of the Blue Mountains LEP zonings, topography, settlement patterns, environmental constraints and fire risk.

We reiterate, the Blue Mountains LGA should not be regarded as a dormitory suburb of Sydney and it is not the role of the Blue Mountains to house Sydney's growing population. In this respect, we are alarmed at a statement on p.122 of *A Plan for Growing Sydney* that it is the Department of Planning & Environment's intention to pursue a policy of housing intensification and urban renewal along the Blue Mountains train line. Blue Mountains commuters will tell you that the current train service is already inadequate and at capacity but the *Draft Plan* does not seem to contain any commitment to improving train frequency and reliability, and station accessibility. Extensive community consultation undertaken for the development of the *Sustainable Blue Mountains 2025 Community Strategic Plan* showed the importance to residents of maintaining heritage and town character and revealed their concerns about over-development. It is the unique character and identity of the Blue Mountains which makes it such a desirable place to live.

The Society rejects the GSC's approach of setting housing targets based on manifestly contestable population projections, and without any reference to supply-side constraints and local conditions and natural constraints, especially as these apply in the Blue Mountains. **The Blue Mountains City Council should be allowed to develop its own housing demand assessment and Local Housing Strategy based on local conditions and constraints (principles outlined in p.74 of the *Draft West District Plan*), existing planning controls in Blue Mountains LEP 2015 and community consultation as, for instance, in the current development of town master plans. The development of the Blue Mountains Local Housing Strategy should not be driven by a mandatory enforceable minimum housing target based on unreliable and disputed population growth projections but by consideration of local conditions (as set out in the Blue Mountains LEP 2015), town master planning and development of a Local Housing Strategy with community consultation.**

The Blue Mountains Conservation Society's view is that, given these factors, the Blue Mountains should be seen as a 'special case' and not be required to have a new housing target applied to it as part of planning for Sydney's growth. However, if the *West District Plan* includes a housing target for the Blue Mountains, this housing target should be developed in co-operation with the Blue Mountains City Council, taking into account the significant supply side constraints which exist – including the limited supply of land which is not impacted by slope, bushfire risk and other environmental issues – and in full consultation with the local community.

The ‘seniors housing crisis’

Over the past few years the pro-development lobby and some members of the community have been criticising the Blue Mountains City Council for not providing enough land for seniors’ housing and retirement villages, citing the increasing age profile of the Blue Mountains. This is essentially an argument about zones applying to land, notwithstanding the *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* which already allows such housing in zones/areas that are primarily for ‘urban purposes’. The pro-development lobby’s often specious claims about the reasons for a perceived lack of seniors’ housing can be seen as garnering support for up-zoning that then makes other development possibilities available e.g. medium-density residential development. The Blue Mountains City Council has consistently replied to these and other accusations about there being “not enough land” available for medium-density and seniors’ housing, saying that relevantly zoned land is available and that lack of such development is a market issue not a zoning issue. There are certainly no large ‘greenfield’ sites available close to villages in the Blue Mountains on which to erect large seniors’ residential developments such as the ‘Treeview Estate’ at Old Bowenfels near Lithgow. Small-scale seniors’ residential development – for example, through adaptive re-use in keeping with the surrounding streetscape and town character which is already happening in the Blue Mountains (e.g. the redevelopment of the old Youth Hostel in Waratah St and the Cecil Guesthouse in Katoomba) – should be seen as the model for retirement and seniors housing in the Blue Mountains.

Housing affordability and affordable housing

There has been also much debate within the local Blue Mountains community about “housing affordability” and “affordable housing”, with the terms often being used interchangeably.

Housing affordability usually refers to the across the board price of buying a house, and the Blue Mountains like the rest of NSW has seen significant housing price increases (up to 20% increases in 2015 and 2016). The price of houses depends on a number of factors such as supply, demand, availability of finance and infrastructure such as schools (the upgrade of the Great Western Highway to four lanes has been suggested as a big reason for significant house price increases in the Blue Mountains - see Sydney Morning Herald, *Blue Mountains house-price growth strong on the back of highway completion*, November 21, 2015). The Society believes improving across the board housing affordability, as the recent debate on negative gearing suggests, is a state-wide if not nation-wide issue and cannot be resolved within the context of the West District Plan.

Affordable housing on the other hand is a term usually restricted to housing that is appropriate for very low to moderate income households and priced so that these households are able to meet other basic living costs such as food, clothing, transport etc. As a rule of thumb, housing is usually considered “affordable” if it costs less than 30 percent of gross household income.

While in some cases affordable housing is sometimes available for purchase, it is most commonly available for rent. Affordable rental housing may be owned by private developers or investors, local/state and Commonwealth governments, charitable organisations or community housing providers. It is usually managed however by not for profit community housing providers.

Affordable housing in NSW has been developed in a range of ways and funded through a mix of sources. This usually includes some if not complete government funding (local/state/Commonwealth) or through government land contributions. Planning incentives for private developers such as that proposed by the Greater Sydney Commission, philanthropic sources, and community housing provider equity contributions also assist in the development of affordable housing.

According to the Centre for Housing Affordability, the amount of affordable housing has been in decline across Sydney including in the West District, which has traditionally provided more affordable accommodation than other parts of Sydney. However the District, especially the Blue

Mountains where owner/occupier is the norm, has a very low proportion of private rental accommodation – well below the Sydney average. The reduction in the proportion of rental housing that is affordable has been significant and the amount of affordable rental housing remaining is very low. The Blue Mountains experienced a significant loss of affordable housing between 2006 and 2013 – 59% fewer affordable rental bonds were lodged in Blue Mountains during this period. For low income households, at September 2013, 1.0% of properties were affordable for purchase in the Blue Mountains.

The vast majority of dwellings in West District are separate houses, especially in the Blue Mountains, which actually lost flats between 2006 and 2011. Studio, one and two bedroom dwellings combined across the District account for just 8.4% of all dwellings. This evidence suggests that while households move to the West District in search of more affordable housing, there is less affordable housing currently available and there is insufficient diversity in the housing stock to meet future needs.

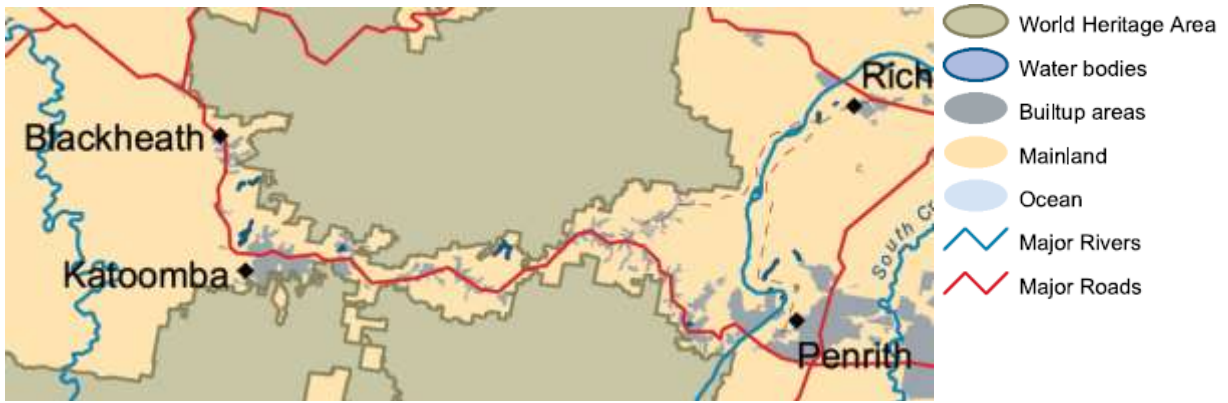
The issue of providing more affordable housing in the Blue Mountains is complex, especially given that there is no large new greenfield residential housing developments whereby developers could be required to provide a proportion of affordable housing via planning incentives (such as in Green Square in Sydney). There are also very few large Council or State owned sites suitable for major residential redevelopment, which also could incorporate rental affordable housing components, a strategy which the City of Sydney has used effectively.

The Society believes the oft argued answer to providing more affordable housing in the Blue Mountains via zoning more areas to allow for medium density residential housing will not solve the affordable housing issue and is too simplistic. There are many areas currently available for medium density development, and excess capacity is available. Medium density development in the form of townhouses, duplexes and semi-detached dwellings is occurring (for instance near the town centres/railway stations of Springwood, Lawson, Faulconbridge and Blaxland). The Society believes instead the issue of increased provision of affordable housing requires a co-ordinated approach with Council, the State and Commonwealth governments, social and community housing providers and community organisations, looking at innovative approaches including new funding sources, and converting existing housing stock to affordable housing through purchase by community housing providers and on renting.

Limits on development in the Blue Mountains

For very good reasons there are zoning and other development restrictions in many parts of the Blue Mountains, particularly outside the town centres. The *Greater Blue Mountains World Heritage Area Strategic Plan 2009* (p.23, 27) warns about the substantial threat that proximity to urban development poses for the ongoing viability of the GBMWA's World Heritage values. This is particularly so for the City of Blue Mountains for, unlike other World Heritage Areas, there is no buffer between developed areas and the national park. This is a problem that the Blue Mountains World Heritage Institute is concerned about and is attempting to remedy. The Greater Sydney Commission needs to recognise the threat posed by further urban development, whether in the villages or near the boundary of the World Heritage Area, and the challenges it would create, for example in stormwater and weed management, and pollution and sedimentation of creeks flowing from the ridgetops into the World Heritage Area. This is also important because many of the creeks on the southern side of the ridgetops in the upper Blue Mountains are part of Sydney's drinking water catchment. These issues must be taken into consideration in any thinking about the Blue Mountains capacity to absorb Sydney's growing population.

The maps and photographs below illustrate the point.

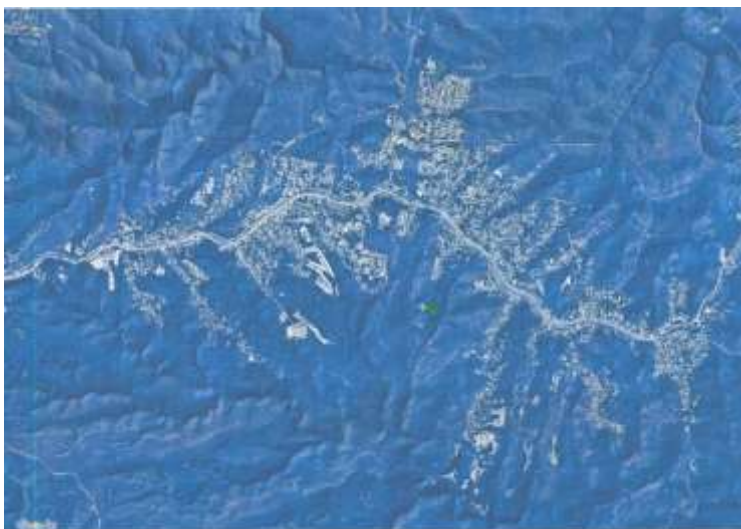


Above: Boundary of World Heritage Area/Blue Mountains National Park with built-up areas directly abutting the boundary.

Below: Glenbrook housing development directly abutting the World Heritage Area



Below: Lawson-Hazelbrook housing development directly abutting the World Heritage Area



Buffer Zone functions

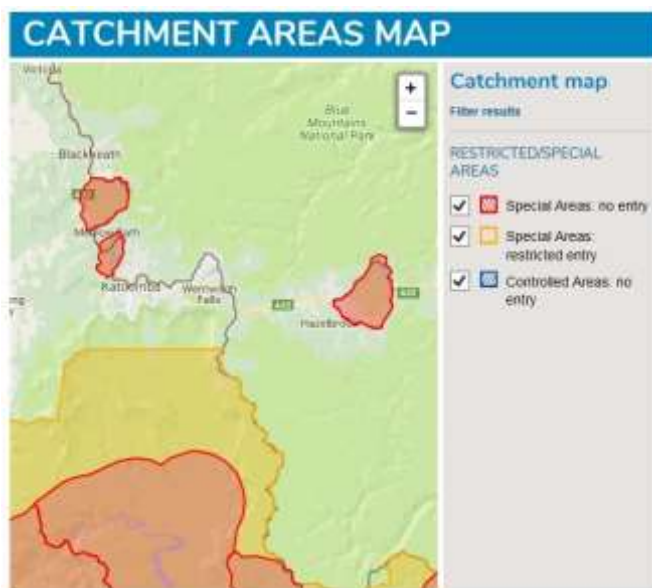
Important for maintaining healthy ecosystems within the World Heritage Area is a surrounding buffer zone that protects the site from development and other impacts. The World Heritage Area is impacted by adjacent land use, including water flow from catchments that feed into the reserve, invasion by introduced species, agri-industry and urban development. Councils are under pressure to allow more subdivision and there are economic incentives for neighbouring rural and semi-rural landholders to allow urban development.

The World Heritage Area has a fragmented boundary with several in-holdings and development corridors. It urgently needs a buffer zone of compatible land uses and management regimes to ensure its values are protected and enhanced. Such a proposal [creating an effective buffer zone] would significantly support Australia's obligations under the World Heritage Convention, which increasingly uses buffer zones to help protect the core values of world heritage properties.

From The Blue Mountains World Heritage Institute website



Left: Leura and Wentworth Falls housing development directly abutting the World Heritage Area



Left: Map showing catchments for the Blue Mountains dams and Sydney's drinking water.

4.6.3 Enhance walking and cycling connections

The BMCS strongly supports enhanced walking and cycling connections.

4.7.3 Create opportunities for more recreation and community facilities and

4.7.4 Support planning for shared spaces

The BMCS strongly supports shared recreational spaces that avoid duplicating facilities with limited uses and reduces clearing more Bushland in the Blue Mountains.

Chapter 5 A sustainable city

The discussion below relates to:

- 5.3 Protecting the District's waterways; Sustainability Priority 1: Maintain and restore water quality and waterway health; Action S1: Review criteria for monitoring water quality and waterway health; Action S2: Protect the South Creek environment
- 5.4 Protecting and enhancing biodiversity; Sustainability Priority 2: Avoid and minimise impacts on biodiversity; Action S4 Develop a Strategic Conservation Plan for Western Sydney; Action S5: Update information on areas of high environmental value
- 5.5 Delivering Sydney's Green Grid and Eastern Escarpment open space and trails; Sustainability Priority 3: Align strategic planning to the vision for the Green Grid; Sustainability Priority 4: Protect, enhance and extend the urban canopy; Sustainability Priority 5: Improve protection of ridgelines and scenic areas
- 5.6 Managing the Metropolitan Rural Area and Sustainability Priority 6: Discourage urban development in the Metropolitan Rural Area
- 5.9 Managing flood hazards in the Hawkesbury-Nepean Valley; Action S16: Address flood risk issues in the Hawkesbury-Nepean Valley.

The Blue Mountains Conservation Society supports many of the Priorities and Actions relating to 'A Sustainable City' including:

- Proposed strategic plans for major waterways (5.3)
- The protection of the South Creek Environment (Action S2)
- The development of a strategic conservation plan for Western Sydney (Action S4)
- The updating of information on areas of high environmental value (Action S5)
- The concept of the Green Grid and the Great Western Highway Penrith to Blackheath corridor and Eastern Escarpment open space and trails projects (5.5)
- The aligning of strategic planning to the vision for the Green Grid (Sustainability Priority 3)
- The improved protection of ridgelines and scenic areas (Sustainability Priority 5)
- The management of the Metropolitan Rural Area (5.6) **but please refer to point 11 below**
- The creating of an efficient West District (5.7)
- Planning for a resilient West District (5.8)

The Society has some concerns however about this chapter of the draft Plan, and makes the following comments:

5.3 Protecting the District's waterways

1. The **strategic plans for major waterways** should aim for the same high standards of water quality whether or not the waterway contributes to Sydney's drinking water. All components of waterways from swamps/wetlands and the smallest streams to the major rivers should be considered in strategic plan development. **To protect the Greater Blue Mountains World Heritage Area, the water quality standard that applies to Sydney's water catchment – that all new development must have a neutral or beneficial impact on water quality – should apply throughout the Blue Mountains.** At the moment, only development located in the drinking water catchment is required to meet this standard.
2. We strongly oppose **offsetting between sub-catchments** assuming that this means that one sub-catchment can be developed and degraded if another is protected. Each sub-catchment has its own unique intrinsic value that should not be tradeable. Effective environmental management at construction and operational stages of developments should aim to protect all sub-catchments.

3. The Society encourages the OEH to recognise the work of **Catchment Co-ordinating Committees/Groups** (e.g. Jamison Creek and Govetts/Katoomba Creek groups) who currently have community partnerships with Local Government and State agencies when developing a body of stakeholders to participate in measuring and monitoring water quality and ecosystem health. (Sustainability Priority 1 – Action S1)
4. The Society agrees that **South Creek** is in a seriously degraded state that as the *Draft Plan* indicates will only worsen with dramatically increased urbanisation and the development of the **Western Sydney Airport**. The Society encourages the Greater Sydney Commission to place a high priority on a whole of catchment plan for South Creek to repair existing damage and to prevent future adverse impacts. It is essential that a more thorough consideration be given of the possible degrading impacts of the Western Sydney Airport on South Creek and that an action plan is developed to prevent or mitigate those impacts before construction starts. (Action S2)

5.4 Protecting and enhancing biodiversity

5. We understand the reasons for **strategic planning at a landscape level** but also caution the Commission against over-looking the variations in biodiversity and individual problems/threats that may only be evident by a **site-by-site analysis**. The presence of a threatened species on one site but not on others may fail to be acknowledged in a wider landscape approach.
6. We are concerned by the statement that *efforts to protect biodiversity values should be based on avoiding and minimising impacts to biodiversity, as far as practicable* (p. 121). “As far as practicable” is not a measureable quantity. Will a transparent ‘test’ of ‘practicability’ that can be challenged by the community be developed? (Sustainability Priority 2: Avoid and minimise impacts on biodiversity)
7. The Society **opposes biodiversity offsets**. Biodiversity offset is a smokescreen “commodity” or concept that attempts to legitimise the damage or destruction to ecosystems, populations and species through a trading scheme. It incorrectly and detrimentally views biodiversity at the phylum level rather than the species. Like-for-like offsetting is a fallacy. Offsetting invariably results in a decline in biodiversity rather than its maintenance. Biodiversity enhancement does not occur where this process is applied.

5.5 Delivering Sydney’s Green Grid

8. **The finalised *West District Plan* needs to clearly differentiate between open spaces for recreational and tourism purposes, and natural areas for conservation purposes.** At the moment these two purposes are mixed together in the ‘Green Grid’ whose objectives and projects relate solely to providing open space, improving sport and recreational opportunities and improving public areas and places. Biodiversity and environmental outcomes do not feature in the Green Grid objectives. This downplaying of conservation values leads to an inappropriate view of the purpose of national parks and reserves. For example, while the Greater Blue Mountains World Heritage Area is identified as part of the “open space” in the West District (p.123), this mischaracterises the GBMWhA which is primarily managed and conserved for its biodiversity values not its recreational values.

The BMCS proposes that the Green Grid, as primarily a recreational designation, be separated from natural areas whose purpose is primarily biodiversity conservation. Two designations could be considered:

- **Green Grid open space and open space corridors** which primarily provide recreational and social opportunities as well as providing some limited environmental and biodiversity outcomes. Development of open space opportunities in the Blue Mountains include the former golf courses at Katoomba and Lawson, with Council identifying their

intention to develop next year a Master plan for the former Lawson Golf Course (Crown land currently managed by Council).

- **Biodiversity reserves and biodiversity corridors** whose primary objectives are biodiversity and environmental outcomes, as well as providing as a secondary purpose appropriate recreational and social outcomes. These areas should form part of the proposed Conservation Plan for Western Sydney (Action S4). In the Blue Mountains the priority in terms of biodiversity corridors are north-south linkages between the southern and northern sections of the national park through the urbanised areas. In addition, biodiversity corridors linking the eastern escarpment and biodiversity reserves in the western Sydney such as the Penrith LGA is also a priority. Blue Mountains City Council has been mapping biodiversity corridors as part of the LEP process, and the Society is keen to be involved in any process to identify and manage biodiversity corridors within the Blue Mountains.

The identification and mapping of new areas which contribute to open space and new areas which contribute to biodiversity outcomes will be different, and who assumes long term management will also be different. Open space can be managed by Councils or specific authorities (such as Western Sydney Parklands). Biodiversity reserves on the other hand can be managed by either Councils, NPWS and in some instance private landholders with appropriate covenants or management agreements in place.

9. We support the **Green Grid priority projects** but would like to see the inclusion of more vegetation community restoration in large priority schemes eg Penrith Lakes Parklands (p. 125). The **Eastern Escarpment Open Space and Trails project** (p.125) must incorporate the conservation and restoration of the vegetation of this important forested zone both for its intrinsic value and its visual amenity especially when viewed from the Cumberland Plain. Recommendations for additional Green Grid projects can be found below.
10. Sustainability Priority 4 calls for **the protection, enhancement and extension of urban canopy trees**. To allow this to happen, especially in the Blue Mountains, **the Society calls on the Commission to negotiate a sensible replacement of the 10/50 bushfire clearance regulations** that have been responsible for a recent dramatic decline in urban trees and the death/displacement of the life forms that these trees supported. In the lower Blue Mountains in particular there are large suburban areas now with very few trees. The 10/50 regulation is clearly an obstacle to the achievement of Priority 4.

5.6 Managing the Metropolitan Rural Area

11. The entire Blue Mountains LGA has been defined as a **Metropolitan Rural Area. This is an inaccurate designation** and one that needs to be changed. The Blue Mountains LGA is not a rural area; it largely consists of ridge-top ribbon suburban areas and transport infrastructure lines surrounded by private bushland, crown land and National Park supported by infertile sandstone soils. Most of the land in the Blue Mountains LGA is zoned 'R' residential and 'E' environmental. The towns and villages of the region are not rural towns and villages serving a rural populace but are instead urban centres serving a suburban community whose members are almost entirely engaged in non-rural employment. Some towns also cater to the burgeoning tourism industry that is changing land use and landscapes especially in the upper Mountains and is in need of regulation. The challenges of urban development impacting on World Heritage-listed National Parks (Blue Mountains LGA) simply can't be equated with the challenges of managing conflicting landuses in the other LGAs in the West District; specifically, urban development progressively encroaching on productive agricultural land in the Hawkesbury and Penrith LGAs.

The Society understands the special protection needs of the true rural lands of the Sydney Basin and agrees with policies outlined in 5.6 of the Draft Plan but these are quite different to the

conservation considerations that should be applied to the bushland landscapes of the Blue Mountains. The characteristic landforms and vegetation of the LGA and its status as a **City in a World Heritage listed National Park** makes it unique and very different to the LGAs of Penrith and Hawkesbury where the Metropolitan Rural Area designation is appropriate.

While some of the protections proposed for the Metropolitan Rural Area are relevant to the Blue Mountains LGA, the Society concludes that the *West District Plan* needs to have a different designated area that incorporates policies, procedures and sustainable priorities that address the issues unique to suburban encroachment on bushland environments. The Society proposes that the Greater Sydney Commission adopt a new designation - **Metropolitan Bushland Area** - that:

- Applies to residential/commercial areas, including towns, villages, residential areas and tourist facilities which are predominantly surrounded by natural bushland and national parks.
- Applies to areas that include not only the Blue Mountains, but parts of the Hawkesbury e.g. Bowen Mountain, parts of Sutherland Shire e.g. Bundeena, parts of the Wollondilly/Camden area and sections of Ku-ring-gai such as Brooklyn and Berowra.

5.9 Managing flood hazards in the Hawkesbury-Nepean Valley

12. The Society remains **strongly opposed to the raising of the Warragamba Dam wall** as proposed in the 2016 Hawkesbury-Nepean Floodplain Management Strategy (p.139-141, 5.9 Managing flood hazards in the Hawkesbury-Nepean Valley). At present most flooding that occurs, impacts on rural areas and the localised floodplain storages of lakes and lagoons. Flooding that has affected residential areas in recent years can generally be attributed to the very low slope of the land on abandoned parts of the floodplain (river terraces), natural drainage flow lines that as a consequence of low slope and impermeable clay soils fail to reach the main river system, and to inadequate drainage provisions in new housing estates.

It is apparent that the raising of the Warragamba wall is a policy driven by government at all levels and property developers who see the available apparently empty floodplain as an opportunity for a large increase in housing supplies without the fear of a loss of votes or even of legal action when floods occur. There is a complete lack of appreciation that a floodplain is a dynamic entity. It is in a state of constant change between hydraulic forces that both create and destroy the river channel and its associated land edges, and it provides the required living conditions for a great diversity of habitats, plants and animals especially those that are water dependent. The policy to raise the wall also fails to appreciate the upstream impacts on riparian ecosystems and on individual species such as *Eucalyptus benthamii* which may be driven to extinction by higher water storage levels.

The Society argues furthermore that the **expansion of housing and commercial activities onto the floodplain that the raising of Warragamba would apparently allow is completely inconsistent with the aims of the *West Sydney District Plan*** particularly with the development of the Strategic Conservation Plan for Western Sydney, the concept of the Green Grid and the management of the Metropolitan Rural Area. We support very strongly the application of strong flood related development controls that are related to current and predicted future flow regimes in the Hawkesbury-Nepean.

Recommendations for additional Green Grid projects

The infrastructure that caters to the activities of bushwalking, bush bicycling and bush running is recognised as part of the assets under Councils' care in the Local Government controlled areas of the three LGAs and also as National Park assets in the sections of the areas under the control of the National Parks and Wildlife Service.

In recent years, this infrastructure has been under pressure from increased visitation at many specific locations. Where Councils or the National Parks and Wildlife Service attempt to close off parts of the networks for safety or environmental reasons, it is very difficult to prevent continued unauthorised visitation. The Blue Mountains Conservation Society understands that the current budget allocation falls well short of enabling Council to maintain the existing networks to an environmentally acceptable standard, let alone expand the network to adequately cater to the tourism industry's need for "iconic" facilities and the growing number of visitors and residents wanting to use such facilities.

The expected population growth in the Greater Sydney Commission's area of jurisdiction can be predicted to increase the pressure on these facilities. While specific plans and timeframes have been allocated to iconic corridors elsewhere in Greater Sydney (for example, the Royal National Park Coast Walk and the Manly to Palm Beach pedestrian and cycling corridors), there is likely to be steeply increasing demand for use of corridors in the three West Sydney LGAs, especially since so much anticipated population growth is within or close to them.

Demands on land managers will include the need for robust drainage systems to prevent environmental damage in heavily used corridors, enhanced track widths and safety railings to prevent accidents and erosion on or near steeply sloping land, improved parking and traffic facilities around trackheads to minimise conflict with local residents as well as other demands.

The BMCS supports the Great Western Highway Penrith to Blackheath Corridor and the Great River Walk projects and recommends that the following walking/cycling corridors be considered for addition to the West District's Green Grid projects:

1. *Grand Clifftop Walk (Wentworth Falls to Blackheath, Mount Victoria and Mount York)*

This title has been in use by Blue Mountains City Council for some time and refers loosely to a system of tracks that link the five upper Blue Mountains railway stations with numerous trackhead car parks in local streets along the Jamison Valley (southern) escarpment as well as major lookouts along the Grose Valley escarpment adjacent to Blackheath town and the Blue Mountains LGA borders of the Megalong, Kanimbla and Hartley Valleys.

The section from Bathurst Road near Narrowneck Road, Katoomba, to the western side of Blackheath Station (Station Street) has been signposted for some time but is partly shared in various sections with bicycles or motor vehicles. The remainder of the network is yet to be signposted, is discontinuous and the condition of usable walking surfaces is highly variable. The section between Leura Cascades and the junction with the track to the top of Leura Falls has been officially closed by Blue Mountains Council for over a year but users continue to exacerbate its environmental deterioration.

Despite its shortcomings and proximity to urban areas, this network has some of the best natural area features of any iconic walking corridor in Australia and it should be a high priority for budgetary allocations by all levels of Government.

2. *Woodford to Glenbrook via The Oaks Picnic Ground bicycle corridor*

NPWS controls most of this but Blue Mountains Council is responsible for the links to the railway stations at either end. Demand appears to have grown steadily for several years. The corridor seems to play a significant role in the catalogue of tourist experiences in the region. NPWS and Blue Mountains Council should seek to continue positive visitor experiences for users.

3. *The Six Foot Track (Katoomba to border between Blue Mountains and Lithgow LGAs)*

This iconic corridor was originally constructed as a bridle path to Jenolan Caves in 1884 but, since its restoration in the 1980s, it has been under control of NSW Government authorities and Blue Mountains Council and has been operated as a pedestrian route with bicycles permitted on sections of

it. The maintenance of its visual catchment, scenic features and condition of its surface is most important to tourist experiences of the region. There are several authorised camping areas from Katoomba to Jenolan Caves, including the Old Ford Reserve within the Blue Mountains LGA.

4. *Narrowneck Firetrail and the pedestrian route from southern Narrowneck to Dunphys Camp via Medlow Gap*

This has been recognised for decades as one of Australia’s most scenic bushwalking routes. The fire trail section from the locked gate at Glenraphael Drive Katoomba to the trail southern terminus near Clear Hill is also used as a recreational bicycle route.

The pedestrian route from the power line just south of Clear Hill to Dunphys Camp is in a gazetted Wilderness Area (Kanangra-Boyd Wilderness) and is entirely within Blue Mountains National Park. It should continue to be managed under the State Wilderness Act, including the restriction of individual walking parties to eight persons.

The steep sections north of the Wilderness boundary are popular for running activities and National Park resources are currently being consumed using temporary management procedures for this area when large groups are expected.

The most severe environmental and safety issues concern a short section known as Tarros Pass. National Parks officers are preparing an upgrade proposal for a diversion to the east known as Wallaby Pass and prompt implementation of this proposal should be given serious consideration.

We look forward to continuing conversations with the District Commissioner as the *West District Plan* is finalised.

Yours sincerely



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Nature Conservation Saves for Tomorrow

ATTACHMENT 1: BMCS OPPOSITION TO WESTERN SYDNEY AIRPORT

1. Introduction.

The Blue Mountains Conservation Society is a community based environment organisation, formed in 1961, and currently has 785 adult financial members.

Our primary area of interest is Nature Conservation, specifically in the Blue Mountains World Heritage Area.

We write on behalf of our Members in opposition to the proposed Western Sydney Airport at Badgerys Creek.

2. Reasons We Oppose the New Airport.

2.1. Impact on World Heritage Area.

The Blue Mountains National Parks were declared as World Heritage in 2000, primarily for their eucalypt biodiversity.

What will be the impact on this biodiversity of a 24-hour, no curfew airport only 10 km away?

Burned jet fuel, fine particulates, noise, potential fuel dumping, all raining down on the eucalypt forests we all know and love.

The whole point of World Heritage Listing is to commit all levels of Government to preserving the area for the whole world to enjoy.

The listing process stalled in the late 1990's as UNESCO were worried about the impact of a Western Sydney Airport.

An Airport at Badgerys Creek risks World Heritage status for the Blue Mountains.

2.2. Impact on Drinking Water Catchments.

Much of the Southern Blue Mountains form the catchments for Lake Burrangong, which supplies 80% of Sydney's drinking water.

Once the Airport is operational, flights to the West will have to fly over either the Blue Mountains townships or the drinking water catchments.

The by-products of aircraft will rain down in the catchments and end up in Sydney's drinking water.

The 'Special Areas' are there to exclude humans, to provide a buffer around the lake, to ensure water quality.

Flying large numbers of huge, noisy, polluting aircraft over the catchments is dangerous and risky.

2.3. Wilderness Areas.

The Blue Mountains includes several declared Wilderness Areas.

In a declared Wilderness area you must be self-reliant, so no machines are allowed, no mountain bikes, no cars, and no helicopters.

The Badgerys Creek Airport threatens all of this.

How can we on a Wilderness walk, or the animals that live in these pristine areas, enjoy the quiet and fresh air with a steady stream of aircraft flying overhead, belching out particulates and noise?

How is it we can't take even the most simple machines into Wilderness, but our most complex machines are able to fly over it?

2.4. Tourism.

Tourists come to the Blue Mountains to enjoy the views, the hospitality, the bushwalks, and the rides at Scenic World.

What will happen to the tourism industry when tourists report back to their friends that their quiet enjoyment of the bush was ruined by an aircraft flying overhead?

Will the view south from Echo Point be the same with a huge aircraft in the eye line?

2.5. Our Communities.

Everybody who lives in the Blue Mountains came here for a different reason, but we are all united in loving the Community we live in.

Cafes, street markets, the Winter Magic parade, leafy streets, hundreds of easy and hard bushwalks, lookouts, Aboriginal and European culture, art, theatre, we have it all.

After 30 years here, I cannot imagine living somewhere else.

We put up with a lot us Mountain folk, from endless Highway upgrades, to poor train services, hours commuting to far-away jobs, and bushfires threatening our homes.

But we love the place, and do not want it ruined by 24-hour aircraft noise.

Many of these comments also relate to people living in Western Sydney.

2.6. Bushland at Badgerys Creek.

We understand that there are extensive stands of remnant and regenerated native vegetation on the site of the proposed Western Sydney Airport.

The time has come for us to acknowledge that clearing of native bushland for our human activities must stop.

We have devastated this island over the past 200 years, and we need to start treating our remnant bushland as the precious jewel of biodiversity we all know it is.

2.7. Aboriginal Cultural Heritage.

We understand that there are dozens of sites of Aboriginal Cultural significance on the site of the proposed Western Sydney Airport.

In the past we have seen such sites documented, then destroyed, all in the name of progress.

This has to stop.

The Australian Aboriginal people occupied this land for hundreds of centuries, and we have no right to continue to destroy evidence of this history.

2.8. Hasty Process.

The Coalition Government announced Badgerys Creek Airport as a fait accompli, to be built, not discussed, as the Government wanted to be seen as 'getting on with it'.

Part of this hasty process was to initially claim that an Environmental Impact Statement was not necessary, as one was done in 1997!

The Government have relented on this, and a new EIS has been prepared and released.

We have produced a comprehensive submission, available here:

http://www.bluemountains.org.au/documents/submissions/BMCS_WSA_Draft_EIS_Submission.pdf

We were very disappointed to see documents on the Infrastructure Australia Web Site changed *during* exhibition and *after* we found errors in them.

2.9. Not Needed.

Kingsford Smith Airport at Mascot runs at about 70% of capacity on its busiest days.

It has handled the same number of flights per hour (80) for many years, with growth in passenger numbers catered for by bigger planes, not more flights.

A second Airport is not required, as stated on multiple occasions by Sydney Airport Corporation.

2.10. High Speed Rail a Better Option.

Half of all passenger movements through Mascot are to and from East-coast destinations, including Melbourne (24%), Brisbane (13%) Gold Coast (7%), Canberra (3%) as well as Albury, Coffs Harbour and Newcastle.

The proposed High Speed Rail network would have stations at all of these places, potentially removing *half* of the current passengers from Mascot.

Two proposals look good to us.

The Infrastructure Australia High Speed Rail Plan:

https://infrastructure.gov.au/rail/trains/high_speed/

The Zero Carbon Australia High Speed Rail Plan:

<http://bze.org.au/zero-carbon-transport-high-speed-rail>

Either of these projects can be justified on cost, returns, safety, convenience, payback, and environmental grounds.

The construction of such an East Coast High Speed Rail network would boost Regional economies, employ thousands of people.

The finished system would enable access from Sydney to Newcastle and Canberra Airports, remove millions of passenger movement from Mascot every year, and remove hundreds of flights to and from Mascot every day.

2.11. Federal Funding of Supporting Infrastructure.

We understand that the Federal Government will spend up to \$1.5 Billion over 7 years preparing the site at Badgerys Creek for an Airport.

We further understand that \$4 Billion will be spent on roads around the Airport site.

How can the Government justify spending these amounts to support an Airport when the Budget is in such a difficult state?

The Zero Carbon Australia High Speed Rail option does not require massive investment by the Government, it just requires the Government to underwrite the debt for the project and it will pay itself off.

2.12. Greenhouse Gas Emissions.

Aircraft leaving Western Sydney Airport will, in 2030, generate 2.8 million tonnes of CO₂e per annum, rising to 21 million tonnes CO₂e per annum in 2063.

Given that we have recently signed and ratified the Paris Climate Change agreement, which targets zero net emissions by 2050, such emissions cannot be allowed to happen.

High Speed Rail would *reduce* our National emissions substantially.

2.13. Unknown Flight Paths.

The interaction between Kingsford Smith Airport, Western Sydney Airport (as well as Richmond, Bankstown and Camden) has not been thought through.

At present many flights from Kingsford Smith Airport head west across the Blue Mountains, we imagine this would be a major problem at the proposed Western Sydney Airport.

We note that military operations at Richmond, Holsworthy and Orchard Hills will also be impacted, as will helicopter and aircraft fire fighting over the Blue Mountains.

All this exacerbates the risk of collisions and increases the stress on air traffic controllers which could be a major problem if two (or more) airports are competing for the same airspace.

2.14. Not in *Anyone's* Back Yard.

My answer to people who claim that our opposition to Badgerys Creek is just NIMBY (not in my back yard) is simple, NIABY (not in *anyone's* back yard).

We need to build transport infrastructure that *reduces* flights at Mascot, for the benefit of the millions affected by aircraft noise and pollution, not increase the flights at a second Airport, and go on to affect millions more.

We need transport infrastructure that can run on renewable energy, not burn irreplaceable oil-based fuels that pollute the Global atmosphere.

We need integrated transport planning that looks at the effects on people and the environment of each option, not just 'getting on with it' to appear decisive and strong.

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