



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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

The Blue Mountains Conservation Society (BMCS) is a community based volunteer organisation with over 800 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. The Society made a detailed submission to the *Draft West District Plan* (attached) and is now pleased to have the opportunity to comment on the *Draft Western City District Plan*.

While the Society understands that the decision to join two districts to create the Western City District is not under review, we are concerned that the Western City District is too large in terms of size, too different in terms of environmental, social and economic variations and too complex in terms of planning issues to be effective.

The Society's position on the *Draft Western City District Plan* remains as it was for the *Draft West District Plan* so please refer to our previous submission. We appreciate any changes made by the GSC to the new draft Plan in response to our submission and we welcome the addition of the Scenic Southern Escarpment as a priority Green Grid Project. However, we wish to draw the Commission's attention to important environmental and planning issues that we believe remain unresolved or not adequately addressed in the new *Draft Western City Plan*.

An unresolved planning anomaly: the Metropolitan Rural Area (MRA) in the Blue Mountains

In our submission to the *Draft West District Plan*, the Society strongly argued that the designation of Metropolitan Rural Area (MRA) was inappropriate to the Blue Mountains LGA. The Blue Mountains is not a rural area and our townships cannot be described as rural villages servicing a rural economy; indeed there is very little agricultural activity in the Blue Mountains LGA and very little of the land is zoned Rural. Most of it is zoned 'R' residential and 'E' environmental.

The Society is therefore disappointed that our recommended alternative designation of **Metropolitan Bushland Area** for the Blue Mountains and similar LGAs wasn't picked up in the new *Draft Western City District Plan*. Further, if the intent of the MRA designation is to protect agricultural land on Sydney's fringe from urban development the MRA designation is not going to protect the Blue Mountains from inappropriate housing intensification under 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 will be affected is still unclear). This SEPP amendment is designed to fast-track residential development through by-passing council development assessment 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.

This ongoing dual problem of the Blue Mountains LGA's inappropriate designation as a Metropolitan Rural Area (meant to protect these areas against urban development) at the same time as its unacceptable exposure to housing intensification (through the proposed changes to the SEPP Exempt and Complying Development Codes 2008) is an issue that the Commission must urgently take up with the DPE.

Biodiversity

With the 'aerotropolis' at the centre of the new *Draft Western City District Plan* the loss of remaining bushland and habitat through the construction of the airport and associated infrastructure, along with surrounding industrial and residential development, will be significant. Under the new biodiversity conservation regime now in force, 'like-for-like' offsets and 'biodiversity credits' (for landholders in rural and bushland areas) are meant to compensate for loss of ecological communities, vegetation types and habitats through the development of the 'aerotropolis'. We understand that the OEH is continuing to identify areas of high environmental values and that new conservation reserves in Western Sydney are planned.

Along with other conservation and environment groups, the Blue Mountains Conservation Society shares a deep concern about the impacts of this regime on

biodiversity in Western and South-Western Sydney. Further, although the aspiration is expressed, the *Draft Western City District Plan* does not recommend binding directives about the incorporation of urban/remnant bushland into the planning and design of new neighbourhoods.

We have noticed that the proposed **Strategic Conservation Plan for Western Sydney** (in *Draft West District Plan* p.120) does not appear in the *Draft Western City District Plan*. The original conservation plan has possibly been superseded by the new biodiversity conservation regime and perhaps the development of the DPE's recently announced **Western Sydney Strategic Sustainability Plan**, covering 7 of the 8 LGAs in the Western City District. We would hope that this is the case, though we can find no information on this proposed new plan.

The huge increase in residential and commercial/industrial development, along with the development of the Western Sydney Airport and associated infrastructure, will totally transform the environmental landscape of Western Sydney. There is a once only opportunity before this development proceeds to conserve the high biodiversity lands, scenic landscapes and opens space lands remaining in Western Sydney.

The final *Western City District Plan* therefore must include a clear and unambiguous biodiversity conservation plan, which outlines area of high biodiversity value where no development should proceed under any circumstances, as well as lower biodiversity areas which could be used to offset development elsewhere. All high biodiversity areas, as well as offset areas, must be conserved in perpetuity (i.e. as national parks or reserves) to ensure long term conservation.

May we also remind the Greater Sydney Commission that the Outstanding Universal Values of the Greater Blue Mountains World Heritage Area relate wholly to its exceptional biodiversity. The Society continues to object to the development of the Western Sydney Airport on the grounds that it poses a threat to these World Heritage Values.

The BMCS is 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 *Western City District Plan* comes into effect will not 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.

If you have queries in regard to the issue raised in this letter please contact me.

Yours sincerely

A handwritten signature in black ink that reads "Madi Maclean". The signature is written in a cursive style with a period at the end.

Madi Maclean
President
Blue Mountains Conservation Society

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