

**Greater Sydney Commission**

PO Box 257

Parramatta NSW 2124

E: [info@gsc.nsw.gov.au](mailto:info@gsc.nsw.gov.au)

Dear Commission,

Congratulations on the development of the PIC for Western Sydney. It clearly reflects a significant amount of robust work and strategic thinking. The directions defined, and outcomes described, are not only achievable aspirations, but essential to the establishment of a liveable and resilient city. Accordingly, they represent the necessary groundwork for the realisation of the Western Parkland City and the benefits associated with it. It is also pragmatic, in outlining the need, and corresponding plans, to prioritise growth in-sequence but with a focus on this growth being cost-efficient and in the context of place-making. The planning scenarios were clearly articulated and the relative benefits of each justified by appropriate technical assessments. The findings are clear and relevant, with findings three and four being a stand-out for the stormwater industry.

We are particularly supportive of, and encouraged by, proposed action nine, which looks to reform whole-of-water cycle and stormwater management to a regional approach. Redefining responsibilities, supporting collaboration, and providing mechanisms to support the sustained investment will take significant commitment and appropriate legislative reform, at various levels. However, it is concerning that there is repetition throughout that the content of the Compact might these initiatives not be funded (e.g., page 66). The 'Growing Parkland City' showed net negative benefit, which is disturbing. Our concern is that this deduction may be more a function of epistemological perspective rather than a reflection of the true, long-term costs of not achieving this vision.

Stormwater represents a significant portion of required capital expenditure, representing one of the biggest risks in not achieving the Parkland vision and yet, in some regards, has the least certainty of being adopted as described. Councils have struggled financially to adequately maintain existing stormwater infrastructure and the lack of certainty over funding for both the development process and the longer-term management is of concern (see discussion on p75, 76). While this may be seen by many as a problem of funding, it is arguably the result of

a policy vacuum. This is further confounded by the heightened flood risk and the need for a blue-green grid to mitigate extreme heat in the future. The roles, responsibilities and funding sources need to be articulated with urgency and the underlying policies adopted to commence the collaborative management early enough in the development processes to make the plan effective.

We applaud several of the notions outlined:

- The cross-government collaboration and initiative for the Wianamatta-South Creek corridor
- The move to whole-of-water-cycle and regional approach to waterways and stormwater management, with identification of need for it to be adequately funded (build and maintenance) and responsibilities clearly articulated
- Support that new operating models should be investigated, such as a regional stormwater authority
- EPA pursuing a PEP for the Wianamatta-South Creek catchment
- The staging makes sense as proposed but needs to be supported by clear and cohesive mechanisms to ensure the delivery is as cohesive. Perhaps this should form part of the mandate of the Western Sydney City Authority
- Review of the process at least every five years
- The measures and indicators seem appropriate, although high-level at this stage.

We have concerns about the following:

- Funding for stormwater is currently inadequate and the PIC Compact expects collaborative management. However, at this stage the onus is still on councils without a concrete suggestion of how the financial pressure could be alleviated other than 'special levies'
- Under proposed action 9, on p110, there is mention that the NSW Government has committed to investigating the restoration and protection of South Creek as part of its broader strategy. This is not the same as committing to restoration and protection.
- This concern is heightened by subsequent discussion that further detailed work is needed to consider overall feasibility and affordability – refer to p104, the risks of not getting the Western Parkland City right are too great.

- That the detention basins are assumed and the potential for retention basins has not been raised. We know retention and detention basins offer potential for integrating into whole-of-water cycle management rather than existing primarily as flood mitigation measures and these matters need to be explored further.

Suggested minor amendments:

- Section 5.2, page 65 – Paragraph commencing “Liveability value...” completely misses mention of place and environment which should both be highlighted here.
- Urban cooling is discussed throughout, but the requirement for the combination of water and trees in the landscape to maximise this cooling is sidestepped. Given the magnitude of difference if just one or the other is applied, this should be emphasised, so it is clear to strategic planners
- Wianamatta-South Creek recently/previously rezoned for ‘green spine’ – should be blue-green spine to recognise that without water, this vision cannot be realised.

In conclusion, Stormwater NSW applauds the progressive and sound concepts put forward in the Western Sydney Place-based Infrastructure Compact, and subject to adoption and clarification look forward to supporting the industry in implementing.

Yours sincerely



**Alan Benson**

**President Stormwater NSW**