



*Advocating for the people of Western Sydney*

**SUBMISSION:  
Response to the Greater Sydney Commission's  
Draft South West District Plan**

**March 2017  
Representing the councils of Western Sydney**

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# Executive Summary

Western Sydney Region Organisation of Councils (WSROC) welcomes the opportunity to comment on the Draft South West District Plan. WSROC has also provided separate submissions for the Draft West Central District Plan and for the Draft West District Plan.

The fundamental issues that need to be recognised and adequately addressed across the West Central, West and South West Draft District Plans are:

- 1) the increase in expected resident populations in these areas and the impact it will have on capacity and performance of waste management services, along with amenity and safety of neighbourhoods in these regions;
- 2) the increase in expected resident populations elsewhere in Sydney and the impact this will have on capacity and performance of Sydney’s main waste management facilities – the majority of which are based in these areas;
- 3) the need to adequately manage encroachment of residential developments on industrial precinct lands that must be left available for the safe and clean operation of major waste management facilities that will serve Sydney’s waste management needs.

Overall, WSROC contends that discussions on “waste” in this document should rather focus on “waste and resource recovery” to better reflect the dual responsibility and challenges in delivering these urban services. WSROC has also identified the major gaps in the draft South West District Plan with regards to waste and resource recovery which if addressed will help ensure the continued productivity, liveability and sustainability of the region as shown in the figure below.

Figure 1: Summary of gaps identified in the South West District Plan with regards to waste and resource recovery services



Specific issues requiring further attention include the:

- planning for future waste management infrastructure needs recognising Sydney metropolitan waste flows and better strategic infrastructure location planning;
- impact of the closure of the Spring Farm landfill and the imminent closure of the Eastern Creek landfill on the South West District's capacity to manage waste and resource recovery services including impacts on the required road and rail network;
- planning of facilities within the region that can receive wastes from several councils in the region;
- use of design-led planning to include consideration of waste and resource recovery and enable safe and efficient waste servicing of high density developments planned for the Liverpool, Fairfield, Camden and Campbelltown LGAs;
- integration of waste and resource recovery in the South West Growth Area land use and infrastructure plan; and
- coordinated waste and resource recovery planning and infrastructure delivery for the Liverpool City Centre.

It is essential in moving forward and updating the Plan that recognition of waste and resource recovery is evident throughout the document and given as much weight as other essential urban services. Just as "making more efficient use of energy and water is a cost effective way to reduce carbon emissions, reduce pressure on waterways and ecosystems, and reduce costs" (Section 5.8.2), the same applies to waste and resource recovery. A focus needs to be placed on providing adequate waste management infrastructure that is strategically planned and built to manage the expected waste generation of the South West District.

## Introduction

### About WSROC

The Western Sydney Regional Organisation of Councils (WSROC), representing councils in Western Sydney, has reviewed components of the Draft South West District Plan relevant to waste and resource recovery. These councils are Blacktown City Council, Blue Mountains City Council, Cumberland Council, Fairfield City Council, Hawkesbury City Council, Liverpool City Council, Parramatta City Council, Penrith City Council and non-member council The Hills Shire Council.

In 2014, the NSW Environment Protection Authority (EPA) funded WSROC to develop the *Western Sydney Regional Waste Avoidance and Resource Recovery Strategy* and to work towards fulfilling strategy projects. The strategy was developed to outline the strategic direction for resource recovery practices across Western Sydney, and explore options for addressing common waste management challenges faced by councils in the region.

A key action in this strategy addresses the linkages between the planning system and provision of waste services to the community.

WSROC facilitates the Western Sydney Waste Planning professional officers group which includes neighbouring councils with similar waste planning issues, including Camden Council, Campbelltown City Council and Wollondilly Shire Council.

As part of the regional waste initiative, this group seeks to ensure that the issues detailed in the Draft South West District Plan:

- maintain community amenity and safety;
- provide scope for waste diversion and resource recovery;
- ensure waste facilities are strategically planned for; and
- ensure there is no negative impact on the requirement of councils to provide waste services to their community.

### The South West District

WSROC recognises that the South West District is Sydney's fastest growing district. Liverpool and Fairfield, WSROC member councils, and Camden, Campbelltown and Wollondilly councils form the South West District. WSROC notes that the Draft South West District Plan identifies that the District will see an increase in population from 715,200 to 1.08 million by 2036. This represents an annual growth of 18,650 per annum from 2016. It is widely understood that waste generation volumes are proportional to total population levels, and the *Western Sydney Regional Waste Avoidance and Resource Recovery Strategy* forecasts a corresponding increase of waste generation to population growth. Increased waste generation will place additional pressure on councils to meet state waste reduction and diversion targets, especially with regards to the closure of the significant Spring Farm Landfill in Camden in 2016. Additionally, with landfill capacity only available in facilities outside the region, transportation distances and costs for waste disposal would increase for councils and their communities. WSROC would welcome the Commission assisting local government in partnership with relevant state agencies in delivering outcomes that overcome and respond to these challenges.

The District will experience increased housing density pressures within existing centres such as Liverpool and the release and development of new centres and neighbourhoods such as Leppington and Edmondson Park will see this trend continue. Currently, housing typology in the District is of primarily detached housing forms with population density increases encouraging the development of medium and high density housing. The mix of housing densities, the creation of new land releases, and the broader Western Sydney region receiving a significant proportion of newly arrived immigrants and being home to a large proportion of culturally and linguistically diverse residents presents challenges for all tiers of government. In WSROC's opinion, one of these significant challenges is in the area of waste management and securing long term waste infrastructure for the South West District.

Overall, the Plan understates the existing problem with waste management in the South West District currently without adequately acknowledging the impact of future accelerated population growth and economic activity.

*With the closure of the Spring Farm Landfill in 2016, imminent closure of the Eastern Creek Landfill in July 2017 and Mechanical Biological Treatment (MBT) facilities at Eastern Creek and Kemps Creek operating at full capacity, the future cost-effective, safe and efficient disposal of putrescible waste in the region is in jeopardy. Lucas Heights Landfill will be the only operating suitable landfill remaining in the Sydney Metropolitan Area (SMA) after the closure of the above mentioned landfills. This will have significant impacts on transport costs for waste management services if not addressed early on. WSROC advocates for broad support from the Commission, the Department of Planning and Environment and the NSW EPA to ensure that adequate waste management facilities are planned for and built to manage expected waste generation.*

## Chapter 1: Introduction

### Planning for land use and infrastructure

WSROC commends the Commission for recognising the need to more efficiently align land use planning and infrastructure requirements, as noted in Section 1.2.2. As acknowledged, population growth requires planning for new and more efficient uses of state and local infrastructure. While State Infrastructure Strategy addresses many key essential services such as water, road, education and energy, there is no consideration of waste disposal and processing needs. In 2015, WSROC commissioned the Western Sydney Regional Waste and Recycling Infrastructure Needs Assessment, which calculated waste and recycling infrastructure needs against our growing population (and growing waste generation) to 2021. This study showed that Sydney will face a shortage in mixed waste treatment, packaging recycling and organics processing facilities by 2021.

#### **Recommendation:**

Action IM1: Infrastructure needed for the essential service of waste and recycling should be considered in the review of the State Infrastructure Strategy and the development of the Annual Infrastructure Priority List. WSROC recommends local government and the waste management industry are consulted during the preparation of this list.

This important infrastructure need should be considered in land use planning to protect Sydney's valuable waste infrastructure assets, and recognised in value sharing mechanisms.

*In particular, the following infrastructure needs should be considered:*

- *a reduction in Sydney's landfill capacity following the closure of the Eastern Creek landfill in July 2017;*
- *the need for additional construction and demolition waste recycling infrastructure as this waste stream will increase dramatically in this region considering the flurry of development activity expected; and*
- *the need to address the growing demand for waste management services in the area with the use of technologies that recover the highest percentage possible in the residual (general waste) stream, i.e. Energy from Waste (EfW) infrastructure.*

It is critical that new waste management infrastructure is strategically located to ensure that transport costs and other impacts on surrounding environments are reduced.

### Greater Sydney Dashboard

WSROC commends the Commission on the provision of this benchmarking tool. The Sustainability profile already contains data on the percentage of waste tonnages recycled in each LGA which is an important metric for local government reporting. However, some local councils use different waste processing technologies such as Alternative Waste Treatment (AWT) and potentially different definitions and calculations of waste recycled and diverted from landfill.

#### **Recommendation:**

To provide clarity in the data presented in the Dashboard, WSROC recommends the Commission provides additional information and commentary to assist council staff when benchmarking their council's performance against others.

## Chapter 3: A Productive City

### Protecting Waste Servicing and Infrastructure lands

#### 3.2 Creating a framework to deliver the Western City

*The potential for the waste and resource recovery industry to positively contribute to employment creation and economic development is often underestimated. The waste industry is an important contributor to the economy and employment, with more than 24,000 direct and indirect jobs resulting from waste and recycling activities in NSW alone<sup>1</sup>. WSROC advocates for the Commission's close collaboration with local government and waste industry stakeholders to ensure that the potential for economic opportunities from this sector is not missed out when developing the economic strategy for this region. This potential could include:*

- *Job creation and the fostering of new waste and resource recovery businesses to meet Sydney's demand for services by 2021 as discussed on page 5 and 12 of this submission;*

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<sup>1</sup> Access Economics (2009) [Employment in waste management and recycling](#) Prepared for The Department of the Environment, Waste, Heritage and the Arts

- *Streamlining start-up processes for businesses in this area as this industry often has difficulty securing long-term leases, land access and long-term contracts to ensure their businesses' sustainability.*

*The pressure placed on waste servicing and infrastructure lands needs to be fully acknowledged in the Plan and we support the protection of these urban service zones. Waste and recycling services should be considered a fundamental urban service, and this region is home to some of Sydney's most important waste asset and infrastructure zones, including landfills, resource recovery facilities and transfer stations. The contribution of urban services and advanced manufacturing zones should be recognised as is currently done in the West Central District Plan. In particular, the Plan should recognise the significant waste service and reprocessing zones around Horsley Park, Wetherill Park, Chipping Norton, Cecil Park, Spring Farm (formerly Jacks Gully), Glenfield, and Moorebank<sup>2</sup>.*

*It is important that the waste infrastructure zone of Eastern Creek, which stretches into Horsley Park, is planned for consistently across both the West Central and South West Districts that cover this zone. We urge the commissioners of these two districts to ensure the zones are not considered in isolation to each other, as this is one of Sydney's foremost waste asset zones, servicing much of the waste disposal and processing needs of metropolitan Sydney.*

### 3.3 Integrating land use and transport planning to drive economic activity

WSROC supports the formulation of a Development Code through the Department of Planning and Environment to inform the planning of new communities in land release areas (Action P11, page 52). However, it is vital that waste management design factors are incorporated in the Code so as to not detract from neighbourhood amenity or impact negatively on the public domain and streetscapes. In particular, design of high density neighbourhoods should pay heed to planning of areas where waste will be stored awaiting collection e.g. bins on the kerbside on waste collection days, bulky waste on council clean-up days, so as to ensure neighbourhoods remain safe, convenient and clean. Street planning considerations incorporated in the Code should also consider street widths to ensure easy and safe access for waste collection vehicles. The Code should also ensure these new communities have adequate access to long term waste management facilities that will support the planned growth and forecasted increase in waste generation.

### 3.8.4 Protect and manage employment and urban services land – a pipeline of employment

WSROC agrees with the Commission's inclusion of Productivity Priority 4 (page 79) to "protect and support employment and urban services land" from pressures which include conversion to residential and retail uses. WSROC supports the Commission's acknowledgment that precaution should be taken rezoning such lands to prevent hindering their role and function. When conducting a net community benefit assessment during rezoning considerations, WSROC recommends that waste management requirements are taken into account in detail when assessing the economic, environmental and social implications of such a decision.

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<sup>2</sup> As referenced in the *National Waste Reporting Mapping Tool* provided by the Australian Government Department of Environment (Waste Maps GIS layer)  
<http://www.environment.gov.au/webgis-framework/apps/nwr-wide/nwr-wide.jsf>

WSROC welcomes the inclusion of Action P22 – “Develop better understanding of the value and operation of employment and urban services land”. WSROC is able to support the Commission in the delivery of this action.

**Recommendation:**

WSROC recommends the recognition of the contribution of the following waste management facilities in the region:

- the SUEZ Advanced Waste Treatment facility at Kemps Creek currently servicing two councils with populations nearing 200,000 each, achieving 60-70% diversion rates;
- the Spring Farm Landfill which is now closed and so alternative employment and economic opportunities should be sought out;
- Horsley Park Landfill;
- the Community Recycling Centre at Liverpool; and
- Reprocessing facilities and transfer stations around Wetherill Park and Camden.

### The South West Priority Growth Area

WSROC welcomes the collaboration of the Department of Planning and Environment with local government and other state agencies to prepare the South West Growth Area land use and infrastructure plan (Action P12, page 53). This infrastructure plan should consider waste management infrastructure needs for the new housing developments in the region as well as the broader Sydney region.

WSROC is available to assist with the development of a comprehensive infrastructure need analysis. It is our view that this analysis is a priority and should be incorporated within the action and planning priority for the South West District. This needs analysis should form part of new zoning changes to ensure effective and efficient waste management for the region is secured. The assessment must also consider what planning and land use decisions are required to protect existing waste management facilities within the region to ensure that they can be expanded (if there is capacity) and retained long term while minimising any potential land use conflict.

### The Liverpool Collaboration Area

WSROC supports the strategic whole of government approach to coordinated planning and infrastructure delivery for the wider Liverpool City Centre. To ensure the long-term urban amenity and “sense of place” in these neighbourhoods, WSROC advocates that due consideration is paid to the design of communal areas for bin storage and collection around high and medium density housing, and for on-site storage of bins in single-unit dwellings.

Though WSROC does not recommend the rezoning of urban services land for residential development, WSROC asserts that residential land size allotment should take into consideration on-site storage of bins so that street frontage of buildings, neighbourhood safety and amenity are not negatively impacted.

### Coordinating Freight Activities

#### 3.8.1 Provide for efficient movement of freight to and within the District with least impact on resident’s amenity

This section of the Plan details key considerations for freight and logistics for the region. We support the intention for land use planning to recognise, support and mitigate the impacts of freight delivery. It is important for the Commission to include waste transport in their planning for freight efficiency and assessment of logistics challenges. It cannot be forgotten

that the provision of waste services to residents and businesses is on the district's largest freight networks, moving more than 303,000 tonnes of South West District household waste plus waste from businesses, commercial and industrial organisations, to disposal and processing facilities, most of which are located in the District. This is currently challenged by distances between waste facilities, capacity limitations on road and rail transfer facilities and traffic congestion, all of which which may further change with the closure of landfills in the region. If metropolitan Sydney waste management needs increase demand for the utilisation of the Woodlawn Bioreactor in the future – to which waste is currently only transported by rail - this will:

- create a demand on the existing rail network to be duplicated south of Goulburn to Canberra; OR
- the need to vary consent for the Woodlawn Bioreactor to allow for waste delivery by road as well.

**Recommendation:**

Transport for NSW should consider the freight and logistic challenges of the waste industry when working to improve productivity of the freight network. Transport for NSW should work with local councils, waste companies and waste industry groups to ensure future planning activities recognise the importance of waste transport and work together to mitigate impacts of waste transport.

## Managing growth and change

### 3.5 Growing and diversifying the economic opportunities in the District's strategic centres

Productivity Priority 2 to “manage growth and change in strategic and district centres, and as relevant, in local centres” directs planning authorities to consider a range of zoning, suitability factors and design principles in assessing planning proposals; however, there are no factors relating to waste or council services. WSROC contends that the productivity of these centres will be negatively impacted if waste management service capacity and access falls short in these areas. Unlike water and energy, waste servicing is carried out manually and above ground, and needs to be considered when planning for centres to allow servicing to be considered in the early design phase. Where this is not considered in the planning phase, the result is streets not appropriately built to allow for suitable waste servicing to occur, with threats to public safety from waste vehicles, reduction in public amenity and reduced efficiency and productivity in collection.

**Recommendation:**

When preparing strategic plans, WSROC recommends that the relevant planning authority demonstrates how its planning for centres has considered strategies to deliver a safe and efficient waste and resource recovery service.

## Chapter 4: A Liveable City

### Planning better communities

#### 4.4.6 Facilitate integrated infrastructure planning – managing growth

This section of the plan discusses the challenges coordinating infrastructure and land use planning in land release and major urban renewal areas, to ensure infrastructure is delivered in line with growth. This is a significant challenge for Western Sydney, as many new growth areas are developed devoid of any waste infrastructure. While the consolidation of large scale waste infrastructure has reduced the need for local landfills and large recycling centres, there are still community based waste and recycling facilities that should be planned for new and growing communities, such as Community Recycling Centres and collection points for the forthcoming Container Deposit Scheme.

We would like to see more engagement with the State and private sector to plan for and deliver these services in the strategic planning space, particularly when land availability and appropriate zoning needs to be considered. It is also heartening to see a proposition to involve the community in infrastructure decision making as their usage behaviour and willingness to travel will guide the location and success of such facilities to divert waste from landfill and recover valuable resources.

#### **Recommendation:**

The Commission, in Action L9, should work with Department of Planning and Environment, to coordinate land use and infrastructure planning for growing communities, which includes strategically planning community waste management and resource recovery facilities. Policies currently under review such as the SEPP (Infrastructure) should be made consistent to reflect these objectives. High level support from state agencies to conduct this work will require additional resources at the state and regional level to ensure that appropriate design and innovation for waste and resource recovery services are embedded in state planning tools.

WSROC recommends special regard is paid to planning for facilities that have the capacity to receive wastes from several councils. Support is need to zone for and plan facilities to adequately manage the amount and types of waste generated as the characteristics of Sydney's waste streams continue to change over time.

#### 4.6.1 Provide design-led planning

Design led planning potentially offers opportunities for delivery of communities designed with better waste servicing and liveability outcomes for residents. Specific references are made to sustainable, efficient and durable development that is designed to minimise consumption of natural resources, and for enjoyable, safe and comfortable infrastructure that is user friendly, accessible and designed to reduce impact for generations. Specifically, Principle 5 notes that development must be functional, responsive and fit for purpose, requiring quality design at the outset, which is important for delivering safe and effective waste services to the community.

We look forward to working with the NSW Government during consultation on the *Better Placed* policy, and recognise the District Plans play a role in delivering design outcomes in regional strategic planning.

**Recommendation:**

We encourage the Commission to ensure design-led planning approaches deliver on Principle 5, to ensure communities are functional, and fit for purpose, which includes planning and integrating functional design which allows for strategically planned and practical waste collection and disposal. In particular, design of lands for high density developments should ensure that waste management services can safely access buildings, and that communal waste storage and collection areas do not impede safe and efficient use of roads and walkways.

#### 4.6.2 Plan for safe and healthy places

This section details design concepts for safe and healthy spaces, noting the need for functional streets to facilitate transport for day to day needs. This is critical for safe and efficient waste services to be delivered to the community, and has been overlooked in many new growth area developments.

Higher development density in the Liverpool, Fairfield, Camden and Campbelltown LGAs will be a challenge for councils in ensuring the provision of safe and effective services as these buildings:

- are notorious for higher rates of bin contamination i.e. the “wrong thing in the wrong bin”;
- present challenges for councils to provide collection services for food and garden organics, and bulky wastes;
- become ‘hot-spots’ for litter and illegal dumping and other anti-social behaviour.

Addressing these issues through design-led planning which closely considers waste management requirements will be paramount to ensuring the South West District remains a safe and healthy place due to the direct negative impacts of these issues on social, environmental and financial sustainability.

**Recommendation:**

Design-led planning guidelines for safe and healthy environments noted in Action L12 should include development of safety requirements for waste services being delivered in urban environments. This will ensure that local communities are able to have their waste collected in a manner that ensures optimal health, safety and amenity for all stakeholders.

#### 4.7.4 Support planning for shared spaces

The Plan notes the shared use of resources could extend to waste services for multiple buildings within a street frontage. WSROC commends the Commission’s consideration of waste management services when planning shared spaces. However, WSROC is concerned that the shared use of resources for waste and recycling e.g. use of street bulk bins for neighbourhood wastes or recycling/donation banks, will actually exacerbate illegal dumping and litter in these areas. When residents use shared bins, it is proven that there is increased disengagement from sustainability and resource recovery ideals as residents feel they do not have ownership of how and who uses the bins and that their actions do not matter when “everyone else is doing the wrong thing”.

**Recommendation:**

WSROC recommends that if shared spaces and resources are planned for use in a waste management context then the design of these spaces must incorporate a method by which

usage can be tracked back to an individual or organisation e.g. swipe card access to communal waste compactors.

In the context of planning shared spaces, strategies also need to be looked at to address the potential increase to illegal dumping and litter. There is a lot of scope to address illegal dumping and litter at the strategic level in these District Plans as it is a broad regional issue and not only localised to specific LGAs.

#### 4.8 Respond to people's need for services – developing complete communities

This section details a range of social services and infrastructure that people need from birth to end of life. However, waste management services and facilities, which people will use continuously throughout their lives, are not covered in any detail in this section. WSROC asserts that waste management services are essential to responding to people's need for services and developing complete communities in this region.

**Recommendation:**

WSROC asserts that non-kerbside collection services for special wastes and recycling such as Community Recycling Centres (CRCs) and Container Deposit Scheme (CDS) collection points must be considered when planning “complete communities”. The location of these facilities and travel distances for residents to and from these facilities must also be factored in when considering the need for additional facilities to meet new resident populations' needs. Social research that WSROC has previously consulted has indicated that metropolitan residents would only be willing to travel a maximum of 15 km to access a facility, with the preference for within 5km of their normal trips<sup>3</sup>.

## Chapter 5: A Sustainable City

### Creating an efficient District

It is concerning that an essential urban service such as waste management has been discussed in as little as one column, especially when compared to the consideration over many pages given to water and green grids, equally complex and important issues.

*It is suggested that 5.8.1 is renamed “waste and resource recovery” to better reflect the dual responsibilities of the role and bring the acknowledgement of this sector into line with industry terminology.*

The chapter largely discusses the need for infrastructure facilities and the associated operational and strategic challenges faced, which is an important priority for the waste and resource recovery industry. As such, we support the wording in Sustainability Priority 9. The considerations within this Priority need to be strengthened within the existing land use planning process and more weight should be given to waste and resource recovery infrastructure requirements mandated in the preparation and determination of planning proposals.

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<sup>3</sup> White, S. (2001), Citizens' Forum Report, Page 3, *Independent Review of Container Deposit Legislation in NSW, Final Report – Volume III: Appendix G.*

*The work identified in Action S11 to identify land for waste reuse and recycling is critical. The Department of Planning and Environment needs to work closely with the NSW EPA as soon as possible to plan an expanded network of waste facilities, particularly for new land release areas in this district. In 2015, WSROC commissioned the Western Sydney Regional Waste and Recycling Infrastructure Needs Assessment, which calculated waste and recycling infrastructure needs against our growing population (and growing waste generation) to 2021. This study showed that Sydney will face a shortage in mixed waste treatment, packaging recycling and organics processing facilities by 2021.*

It is pleasing to see reference made to identifying land for reuse facilities, as these facilities are lacking in Western Sydney. Reuse activities, though usually operating on a smaller scale than recycling, have the potential to attract economic opportunities, access to affordable goods and employment, especially for our more vulnerable and disadvantaged populations, adding not only to the sustainability of these areas but also the productivity and liveability.

Precinct based waste systems could deliver efficiency in waste collection systems if well developed for greenfield sites. Installation of these systems in brownfield sites may prove to be more difficult as several of these technologies use underground vacuum-based collection which requires the collaboration of planning authorities and the obtainment of development consent for construction “underground” as well as “on land”. Additional source separation opportunities offered by some types of precinct-based systems may lead to better waste management outcomes. Councils continue to receive Development Applications with proposals for these systems as the need to avoid potential conflicts between safe and efficient waste management services, increasing populations and facility access have been recognised by a number of proponents. It is important that leadership and support is shown by all planning authorities to encourage the private sector to trial and implement such a systemic change to collection regimes. This would be a significant change to the status quo, and will require adequate investment and resourcing to ensure any transition to precinct based systems are successful.

**Recommendation:**

- A. It is strongly recommended that Sustainability Priority 9 – “support opportunities for District waste management” be expanded to recognise Sydney-wide flows of waste and this impact on waste management infrastructure in the region. Appropriate strategic planning to ensure land and zoning for future infrastructure needs should be undertaken, and it is imperative that the Department of Planning are involved in this action.
- B. 5.8.1 should be renamed “waste and resource recovery”.
- C. Any planned trials or programs towards precinct based systems must be well resourced to facilitate the systemic change needed, and allow for adequate engagement to enable a successful transition.

WSROC is willing to assist with the activities to progress these actions that to meet the needs of the councils in the South West District. This analysis needs to form part of new zoning changes to ensure effective and efficient waste management for the region is secured.

## Planning for a resilient district

The Plan notes the acknowledgment of important policies to strengthen the resilience of these regions during natural disasters (pg. 154-7).

### **Recommendation:**

WSROC recommends that the immediate need for waste management following natural disaster events is planned for and acknowledged when preparing disaster risk management plans.

WSROC also recommends that Action S17 – “identify and map potential high impact areas for noise and air pollution” be expanded to include mapping of existing waste management infrastructure and facilities as potential impact areas for noise and pollution (odour and air quality). This will ensure planning controls and land use decisions recognise the importance of these facilities, provide adequate buffers to minimise any future land use conflict and allow for any possible expansion of these facilities, increasing resilience.

## Summary

WSROC advocates that waste and resource recovery should be seen as an essential urban service and incorporated into infrastructure planning for the South West District. WSROC welcomes the inclusion of waste management driven priorities within sustainability actions and priorities of the South West District Plan. However, for regional waste management issues to be considered holistically for the South West District, waste management actions need to be integrated within productivity and liveability priorities of the District Plan.

Overall, WSROC recommends that the management of waste and recyclables is treated holistically under the umbrella term of “waste and resource recovery” to capture the full gamut of activities in this space, and therefore, the planning considerations that are required. Referring to just “waste” can mean only activities relating to the management of general waste, waste collection and disposal, whereas “waste and resource recovery” will cover management of general waste, recyclables, and food and garden organics, as well as the collection, recycling and disposal of wastes.

*In particular, WSROC asserts the need for the:*

- *Strategic planning to ensure current waste management facilities do not fall short of demand from growing populations, that undue pressure is not placed on these facilities, the majority of which are based in the West Central and South West districts, and that land use planning for waste infrastructure is planned along with other critical infrastructure;*
- *protection of waste servicing and infrastructure lands, protecting these areas from residential encroachment;*
- *recognition of the contribution of waste and resource recovery activities to the employment and economy of the region and allowing for future expansion in these areas;*
- *coordination of freight activities to ensure waste transport is not impact by increased transport movements;*
- *planning better communities taking into consideration design-led planning, community feedback and new policy changes including Community Recycling Centres and Container Deposit Scheme collection points; and*

- *planning for a resilient district by incorporating waste and resource recovery considerations in natural disaster management.*

The above gaps identified in the draft West District Plan and where these gaps should be addressed in detail in the draft Plan’s chapters on productivity, liveability and sustainability are summarised in the figure below.

*Figure 2: Summary of gaps identified in the South West District Plan with regards to waste and resource recovery services*



*In this submission, WSROC reiterates the need for the planning, construction and operation phases of the **Western Sydney Airport** to be supported by state of the art infrastructure, which includes infrastructure for waste and resource recovery, as expressed in WSROC’s general submission to the Commission on these draft District Plans.*

We strongly encourage the Commission to consider the issues highlighted in this submission especially given the growth aspirations for Western Sydney.

WSROC appreciates that local government has been consulted in the lead up of this submission period and we would encourage the continuation of this level of partnership.

We look forward to working with the Commission on addressing the long-term waste management servicing needs of communities in the South West District.