



Advocating for the people of Western Sydney

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

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

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Executive Summary

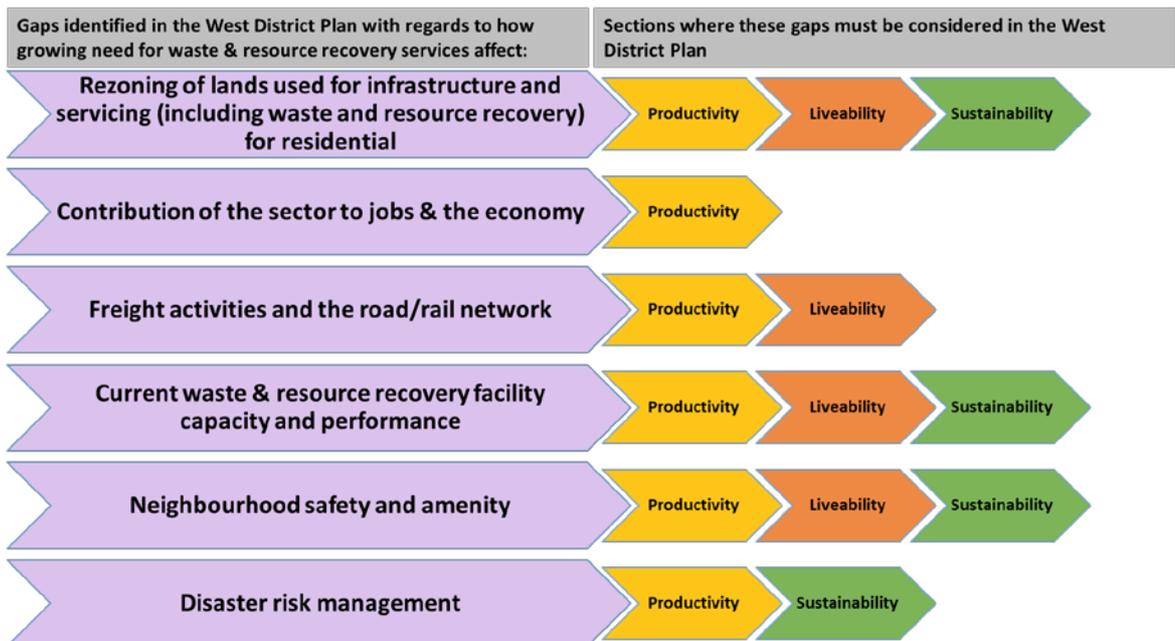
Western Sydney Region Organisation of Councils (WSROC) welcomes the opportunity to comment on the Draft West Central District Plan. WSROC has also provided separate submissions for the Draft South West District Plan and for the Draft West District Plan.

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 West Central 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 West Central District Plan with regards to waste and resource recovery services



Specific issues requiring further attention include the:

- recognition of waste as an essential urban and community service;
- strategic planning to ensure availability and protection of zoning of lands to cater for future required increases in capacity of waste and resource recovery infrastructure;
- use of design-led planning to include consideration of waste and resource recovery and enable safe and efficient waste servicing of high density and new styles of developments planned for the Penrith LGA; and
- integration of waste and resource recovery considerations in growth area land use and infrastructure plans.

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 5.7.2), 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 West Central District.

We would like to thank the District Commissioner Professor Edward Blakely, for recognising the importance of reducing waste to landfill by acknowledging the need for district wide alternatives to waste management in his Commissioners Foreword. Waste management is an essential service to residents and businesses throughout Sydney, but is often neglected when strategic planning occurs. Drawing attention to this need for strategic planning is appreciated.

Introduction

About WSROC

The Western Sydney Regional Organisation of Councils (WSROC), representing councils in Western Sydney, has reviewed the Draft West Central District Plan and commented on components 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 councils of The Hills Shire Council, Camden Council, Campbelltown City Council and Wollondilly 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 across the region.

A key action in this strategy addresses the linkages between the planning system and provision of waste services to the community. As part of this regional waste initiative, WSROC seeks to ensure that the issues detailed in the Draft West Central 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 West Central District

WSROC recognises that the West Central District is a fast growing and highly urbanised district. The District is dynamic and contributes significantly to Greater Sydney both economically and culturally. This region will see an increase in population from 971,000 to 1.52 million by 2036, representing an annual growth of 27,500 per annum from 2016. It is widely understood that waste generation volumes are proportional to 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 several major waste facilities due for imminent closure in the region. 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.

It is pivotal that as the District's growth continues, greater leadership and collaboration with all stakeholders is needed in regards to waste management. This is essential for local councils, state agencies and waste sector industries who are key in securing sustainable waste management infrastructure that is responsive to the current and future needs of the District. Given the densities proposed and population increase across the District, leadership and commitment to improved coordination of council and private waste services and investment in new waste management technologies is needed.

Too often waste management, across all areas of planning, is an afterthought and not considered as a real issue to be incorporated into planning strategy.

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

Chapter 1

Planning for land use and infrastructure

WSROC commends the GSC 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.

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

In particular, the following infrastructure needs should be considered:

- *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, and to address closure of infrastructure reaching capacity (such as Eastern Creek landfill).*
- *Creation of standardised waste infrastructure requirements to address the shift towards higher density development across western Sydney*
- *Greater emphasis toward the minimum acceptable waste requirements for each type of development including growth area plans, land releases, subdivisions and high density dwellings to ensure all developments can be serviced in a safe and efficient manner*

Chapter 3: A Productive City

Protecting Waste Servicing and Infrastructure lands

3.1 The West Central District's Economy

It is acknowledged in the Plan that urban services land are economic generating areas and the Plan in particular recognises the districts of Eastern Creek, Marsden Park and Clyde as precincts for employment from urban services, and Blacktown, Rydalmere, Silverwater and Camellia, where significant waste service and reprocessing occurs through advanced manufacturing.

Waste and recycling services should be considered a fundamental urban service in this strategic planning; these areas are home to some of Sydney's most important waste asset and infrastructure zones, including landfills, resource recovery facilities and transfer stations. Furthermore, 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 alone¹.

The listing of Smithfield North, Eastern Creek and Camellia as precincts for major employment and urban services in Table 3-3 is integral to protecting the operation of these zones from the pressures of residential encroachment and other challenges faced by waste asset land.

The area around Eastern Creek and Seven Hills should be given due consideration given the imminent closure of the Eastern Creek landfill in July 2017. The location of the site in Powers Road, Seven Hills may see increased job opportunities, increased productivity and economic development in the waste and resource recovery sector.

Recent investigation by one council into potential land opportunities for waste processing was recently undertaken and found that land potential in the far north of the District provided a number of sites where waste management facilities are permitted under current land use planning. Of particular note are a number of existing and disused quarrying operations in the Maroota area that may be suitable for the construction and operation of resource recovery infrastructure which may be appropriate to consider in strategic plans.

WSROC supports the protection of these urban service and advanced manufacturing zones, and urges the GSC to ensure waste and resource recovery is considered an urban service in initiatives to protect these lands. While advanced manufacturing sectors listed acknowledges the contribution of building and material recycling, it should also include clusters of reprocessing facilities around Clyde, Marayong, Seven Hills, and Glendenning.

Waste servicing and infrastructure assets must be protected under Productivity Priority 9 to ensure additional permissible uses do not hinder their role and function. The scarcity of appropriately zoned waste service and asset lands, and limited facilities that exist mean that linkages the wider benefit to metropolitan Sydney needs to be considered. These same factors need to be considered in Action P4.

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

The area around Eastern Creek and Seven Hills should be given due consideration given the imminent closure of the Eastern Creek landfill in July 2017.

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.

Coordinating Freight Activities

3.6 Coordinating freight activities with land use planning

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 Greater Sydney 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 one of the district's largest freight networks, moving more than 385,000 tonnes of waste from households in this area to disposal and processing facilities, most of which are located in the West Central district.

These freight operations are currently challenged by greater distances between waste facilities, road and rail transfer facilities becoming more limited in capacity and traffic congestion on these networks. It is also likely that waste transfer station requirements will increase given the growing distance between collection points and waste facilities, particularly with the imminent closure of Eastern Creek landfill in the region putting further pressure on current transfer facility capacity.

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

3.4.1 Planning priorities for strategic and district centres

Productivity Priority 3 details a range of strategies that must be considered to create local and district centres that improve accessibility and productivity. The consideration of retail and service needs, provision of urban spaces, promotion of arts and culture and the practice of Crime Prevention through Environmental Design amongst others are all worthy strategies for consideration, but this list should also include safe and efficient waste servicing. Unlike water and energy, waste servicing is carried out manually and above ground, and needs to be considered in the planning of 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, the relevant planning authority needs to demonstrate 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

This section of the plan discusses the challenges coordinating infrastructure and land use planning in urban renewal and greenfield growth centres 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 Greater Sydney Commission, in Action L9, should work with Department of Planning and Environment, specifically the NSW EPA, to coordinate land use and infrastructure planning for growing communities, which includes strategically planning community needs for waste management and resource recovery facilities. Facilities should be planned to adequately manage the amount and types of waste being generated as the characteristics of Sydney's waste streams continue to change over time.

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. 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.

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 appropriate waste collection and disposal. In particular, design of lands for medium and high density developments should ensure that waste management services can safely access buildings and that the provision of 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 Blacktown, Cumberland and Parramatta LGAs will be a challenge for councils to ensure the provision of safe and effective services as these buildings:

- are notorious for higher rates of waste stream 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.

Design-led planning should be holistic to ensure neighbourhoods remain safe and healthy places while considering the impacts of various urban design types on all major urban services including waste management. For example, roadside bio-swales incorporated in the design of new communities in The Hills Shire where kerbsides are vegetated to prevent flooding and improve drainage have a detrimental outcome for waste management, as illustrated in the figure below. Presentation space for bins on collection days is reduced – limited to the road or driveway occasioning traffic and safety issues, and bulky wastes for council pick-ups have been presented on private property, raising amenity concerns and liability issues for waste collectors.

Figure 2: Use of bioswales and impacts on bin and bulky waste presentation space, North Kellyville Release Area



Councils are willing to work with other stakeholder to ensure improved planning requirements deliver:

- the effective design of waste storage and collection areas which promote neighbourhood amenity, user safety and waste stream separation;
- the efficient design of street layouts to allow for the safe and easy access of waste collection vehicles and for the temporary storage of bulky wastes prior to collection; and
- the adequate provision of public place waste and recycling collection infrastructure in commercial and strategic centres.

Addressing these issues through design-led planning which closely considers waste management requirements will be paramount to ensuring the West Central 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 L13 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. The progression towards higher density residential development has seen increases in illegal dumping of bulky household waste in shared spaces and needs to be considered further in planning instruments.

4.8 Respond to people's need for services

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 trips².

Chapter 5: A Sustainable City

Creating an efficient District

The introduction to this section is a repetition of information on Western Sydney Parklands contained on page 156 and 157. It is expected this is an error and needs to be fixed.

The end of this introduction noted government policies addressing resource efficiency, including the *NSW Waste Avoidance and Resource Recovery Strategy*, consideration of which is integral when planning waste and resource recovery efficiencies.

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.

² White, S. (2001), Citizens' Forum Report, Page 3, *Independent Review of Container Deposit Legislation in NSW, Final Report – Volume III: Appendix G*.

It is suggested that 5.7.1 is renamed “waste and resource recovery” to better reflect the dual responsibilities of the role and bring the acknowledgment 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 and inclusion of Sustainability Priority 11, subject to the inclusion of further points:

- considering the need for advanced waste technologies, such as appropriate advanced waste processing and energy from waste facilities; and
- The need for authorities to facilitate behaviour change initiatives addressing consumption and increased waste generation by residents and businesses.

The considerations within this Priority in particular need to be strengthened within the existing land use planning process, and more weight should be given to waste management infrastructure requirements mandated in the preparation and determination of planning proposals.

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. Additionally, community based facilities are lacking in this district and need to be considering in growth area and rezoning plans.

The work identified in Action S9 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 and rapid growth sections in the north west of the District in this district.

It is pleasing to see reference made to identifying land for reuse facilities as these facilities are currently 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 to the productivity and liveability.

Precinct-based waste systems could deliver efficiency in waste collection systems if well developed. 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.

Given the complexities of development styles and land uses in this district, there needs to be clarification of the meaning or intent of precinct based waste collection to fully consider the potential opportunities and efficiencies.

It is unclear as to how local government should contribute to “reducing waste in urban renewal projects and infrastructure projects” (page 165). Other than a state-based target for construction and demolition recycling, local government has not traditionally had a major impact on waste reduction in these areas. Support of these projects will be dependent on whether waste reduction targets are mandatorily set or are aspirational.

Recommendation:

- A. It is strongly recommended that Sustainability Priority 11 – “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 adequate provision of land and zoning for future infrastructure needs should be undertaken, and it is imperative that the Department of Planning, not just the NSW EPA, are involved in this.
- B. Sustainability Priority 11 should also consider the need for advanced waste technologies and district wide reduction to consumption and increasing waste generation levels.
- C. Section 5.7.1 should be renamed “waste and resource recovery”.
- D. Clarification is needed for the meaning of ‘innovative precinct based waste collection, and 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 available to assist with the development of a comprehensive infrastructure needs analysis and encourages the incorporation of this analysis within the action and planning priority for the West Central District. This needs analysis should form part of new zoning changes to ensure effective and efficient waste management for the region is secured.

WSROC is willing to assist with the activities to progress these actions to meet the needs of the councils in the West Central District. This analysis undertaken to identify land for future waste and resource recovery infrastructure needs to form part of new planning instruments and area plans to ensure effective and efficient waste management for the region is secured.

It is noted that within the Plan there is no consideration of the widespread issue of illegal dumping in the regions vast urban bushland and rural areas. This is another regional sustainability priority that impacts conservation and land management in addition to amenity and liveability challenges.

Prevention of, and management of illegal dumped wastes, needs to be considered in projects undertaken to deliver Sustainability Priority 7 and Sustainability Priority 9, in addition to general waste and resource recovery initiatives.

Planning for a resilient district

The Plan notes the acknowledgment of important policies to strengthen the resilience of these regions during natural disasters (pg. 166-171). WSROC recommends that the immediate need for waste management following these events is planned for and acknowledged when preparing disaster risk management plans.

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.

Summary

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

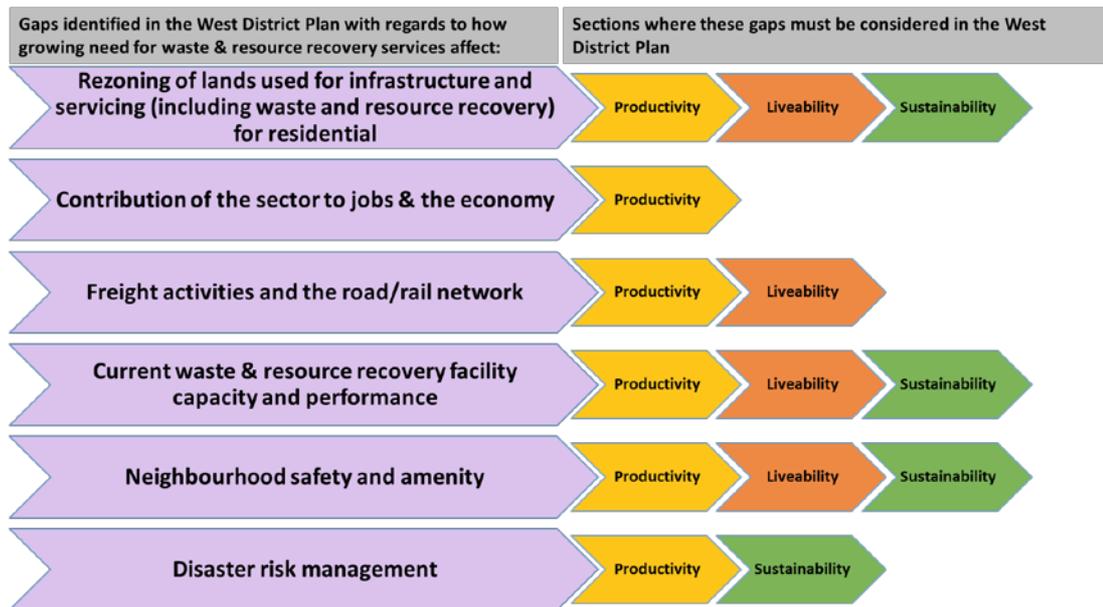
Overall, WSROC recommends that the management of waste and recyclables is treated holistically under the umbrella term of “waste and resource recovery” to capture the full gamut of activities in this space, and therefore, the planning considerations that are required. Referring to just “waste” can mean 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 district, 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 3: Summary of gaps identified in the West Central District Plan with regards to waste and resource recovery services



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 West Central District.