

26 February 2018

The Hon Anthony Roberts MP
Minister for Planning
GPO Box 5341
SYDNEY NSW 2001

Dear Minister

RE: Greener Places – Green Infrastructure policy for NSW

The Cooks River Valley Association (CRVA) is the leading community advocate for the Cooks River Valley. We are writing to comment on the Greener Places policy* and our primary concern is how the various NSW planning, transport and land use strategies impacting on our region will actually deliver new and improved green space.

The CRVA supports the Greener Places statement that:

Fundamental to the success of implementation is a shift in thinking so that Green Infrastructure is considered essential infrastructure making it part of up-front strategic land use and infrastructure planning undertaken by the Department of Planning and Environment, Greater Sydney Commission, other agencies and councils (p46).

The Department of Planning and Environment is also responsible for the Office of Strategic Lands (OSL) and its new Strategic Business Plan* with a key role in the delivery of the green grid. The CRVA hopes that together Greener Places and the OSL will deliver on the following three priorities:

- A planning mechanism to deliver green infrastructure.
- The Cooks River open space corridor priority project.
- Secure the future of Canterbury Racecourse as RE1 open space.

Planning mechanism to deliver green infrastructure

The Greener Places draft policy appears to limit the actual delivery of new green space to what can be purchased through S94, Special Infrastructure Contributions (SIC), Voluntary Planning Agreements and the like i.e. there is no other planning mechanism or source of funding identified. These developer driven policy settings limit what can be achieved. They can change and that is where the OSL is particularly interesting as the Department of Planning specifically wants to investigate new funding mechanisms, in addition to its power to acquire and rezone land through the OSL. If green space / the green grid is characterised as infrastructure and can access grants, debt financing and other mechanisms as agreed by government then various pathways including the

* <http://www.governmentarchitect.nsw.gov.au/thinking/greener-places>

* <http://www.planning.nsw.gov.au/News/2018/~media/0E66573C5D9C4FDC84A01F6467565649.ashx>

Treasury business case and cost benefit analysis processes can provide significant resources to deliver new green space.

The OSL is strongly positioned to lead the delivery of new and improved green space as it enables the Planning Minister to make strategic land investments:

- that are important to planning for the State;
- beyond the focus of any single agency or level of government;
- with time horizons independent of budget cycle; and
- timed to benefit the State's return on investment and manage social impact to promote the social and economic welfare of the community and a better environment (p4).

Given the OSL's broad remit and powers the two priority pieces of green infrastructure the CRVA supports are delivering on the Cooks River open space corridor and securing the future of Canterbury Racecourse as RE1 open space.

Cooks River open space corridor

The Cooks River open space corridor is a priority project identified by the Greater Sydney Commission (GSC) in its plans for the South and Central Districts. The GSC appears to largely be an aggregator of planning and transport strategies and the November 2017 District Plans arguably contain less detail than the November 2016 drafts about green space and priority projects. There is a major opportunity for improving the various NSW green space, planning and land use strategies by naming the Cooks River Alliance (CRA) as a stakeholder and partner in delivering new and improved green space.

The management of the Cooks River catchment is currently fragmented across eight councils, private entities and corporations, utility/resource providers, and multiple state government agencies. The CRA uses the combined resources, experience, knowledge and skills within the Cooks River catchment councils and the community to address the complex environmental problems of the Cooks River. CRA activities include: engaging with people living and working in the Cooks River Catchment, monitoring water quality, seeking funding, managing the construction of on-ground works, and advocating and lobbying for legislative amendments to help improve the health of the Catchment. The CRA will also begin a scoping study for the first Cooks River Catchment Coastal Management Plan from early 2018 thanks to funding from the NSW Government*.

Working with the CRA would build on the existing regional work it does and leverage its relationships with the councils in the catchment. The CRVA is also willing to provide its resources, corporate knowledge and on the ground networks towards establishing and improving the open space corridor.

Future of Canterbury Racecourse

The future of Canterbury Racecourse as green space is an ongoing project for the CRVA. We enclose (below) our July 2017 response to the Urban Renewal Corridor as that submission

* <http://cooksriver.org.au/about-us/alliance/>

addressed the Racecourse in some detail and remains relevant. Since the previous submission there have been three significant developments: The Australian Turf Club (ATC) continues to actively pursue the piecemeal development of the site, the Office of Sport has recommended that the entire site be zoned RE1* given the shortage of open space and sporting fields in the region and the Office of Strategic Lands (OSL) has published its Strategic Business Plan.

The OSL could be the lead agency to take on delivering Canterbury Racecourse as RE1 community green space for active and passive recreation. The OSL's role in the development of Sydney Park offers a useful case study for what is possible on the Canterbury Racecourse site.

SYDNEY PARK CASE STUDY

Located in St Peters, Sydney Park is the result of a concentrated effort to address a previous lack of public open space in inner city Sydney. Although relatively small, the park is an important example of OSL acquiring land where there is a demonstrated community need. As a former industrial site in a built up urban area, significant funds were needed to acquire the Sydney Park site. OSL acquired the land in the 1980s and progressively transferred it to the South Sydney and Sydney City Councils. State and local government worked collaboratively to develop an inviting open space comprising 40 hectares of landscaped gardens, rolling hills, meandering pathways and picturesque wetlands (p15).

The opportunity for the OSL is significant and timely if the Racecourse site is acquired while it is still zoned RE2 and before it can be sold by the ATC in 2021. As the OSL itself states the 'Early acquisition of land for future projects enables the Government to capture value in a market where land values are increasing' (p8).

Thank you for the opportunity to comment on the Greener Places draft policy. We look forward to participating in any stakeholder workshops and then reviewing the final policy. The CRVA also welcomes the opportunity to discuss any aspect of this submission with you or Department of Planning staff.

Yours sincerely



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*https://majorprojects.accelo.com/public/238112b65cb0cb5a7e805bbdb41aab67/222441_Draft%20Submission%20by%20Office%20of%20Sport%20on%20Sydenham%20to%20Bankstown%20Urban%20Renewal%20Corridor%20Strategy.pdf

6 July 2017

The Hon Anthony Roberts MP
Minister for Planning

The Hon Gabrielle Upton MP
Minister for the Environment, Minister for Local Government

Morris Iemma
South District Commissioner
Greater Sydney Commission

Dear Ministers and Mr Iemma

RE: Canterbury Precinct and Racecourse – Master planning new green space for Sydney

The Cooks River Valley Association (CRVA) is the leading community advocate for the Cooks River Valley. We are writing to seek a meeting with you before the 3 September 2017 close of the Sydenham to Bankstown Urban Renewal Corridor Strategy consultation to discuss integrated master planning of the Canterbury Precinct and Racecourse site to deliver essential new green and recreational space for the district and Sydney region.

We support a master planning process that will avoid a piecemeal rezoning and sell off of the multiple lots that make up the Racecourse site and acknowledges Canterbury is a suburb that, unlike other areas, has already exceeded ambitious housing targets¹ with no new open space despite a demonstrated shortage identified in the Canterbury Open Space Strategy². The June 2017 Urban Renewal Corridor and associated Canterbury Priority Precinct documents and maps also contain several statements about the Canterbury Racecourse site that we are keen to resolve with relevant stakeholders to ensure an integrated approach to the proposed 2017/18 Priority Precinct master planning process.

In particular we wish to challenge the Urban Renewal Corridor presumption that the only way to create new open space within Canterbury Racecourse is ‘as works in kind by developers’³ on land that is currently zoned RE2 for Private Recreation and cannot be used for housing. We also question:

- The assertion that ‘The precinct is well served by public open space...’ (p. 20). What source or measure justifies this statement that contradicts the Canterbury Open Space Strategy?

¹ <http://www.dailytelegraph.com.au/newslocal/the-express/new-study-shows-canterbury-bankstown-5000-over-state-government-housing-targets/news-story/4d406ee47fb225f80b69a836ffb32e76>
<http://www.smh.com.au/nsw/sydneys-tale-of-two-suburbs-new-analysis-shows-the-wide-spread-of-development-20170204-gu5hwq.html>

² <http://haveyoursay.cbcity.nsw.gov.au/Draftopenspacestrategy>

³ p34 Canterbury Station Precinct, Sydenham to Bankstown Urban Renewal Corridor Strategy released 27 June 2017.

- How many voices at community forums justify the conclusion that ‘opinions were divided’ (p. 10) on the future uses of Canterbury Racecourse? CRVA members attended some of the May 2016 community workshops and our recollection is different.
- Of the 1800 submissions to the Urban Renewal Corridor 2016 consultation how many demonstrated ‘mixed views’ (p. 10) on Canterbury Racecourse as a site for either development or open space? The Department of Planning and Environment Sydenham to Bankstown Online Survey Results November 2015⁴ demonstrate consistent and significant community support for parks and open spaces. Greater Sydney Commission District consultations in 2016 have also demonstrated that parks and open spaces are top issues among residents with comments highlighting ‘the importance of protecting open space from development and ensuring that the amount provided responds to the needs of our growing population’⁵.
- Urban Renewal Corridor maps are inconsistent in their treatment of:
 - Lees Park (Lot 2/DP561293) which is not part of Canterbury Racecourse. It is currently zoned RE1 Public Recreation and owned by Council.
 - The trapezoid of vacant land between King, James and Princess Streets that is zoned RE2 Private Recreation and not currently available for medium density housing.
 - 15 Close St (Canterbury Bowling Club) subject to a D/A that has not been determined so the site is not currently available for high or medium rise dwellings.

The history of development across Sydney and in Canterbury demonstrates that existing mechanisms like S94 contributions, Special Infrastructure Contributions and Voluntary Planning Agreements do not deliver regional open space on sites the scale of Canterbury Racecourse as the extensive development required to generate contributions compromises the available green space (which is also significantly more valuable if the zoning has changed to permit development). Locally we draw your attention to the Sydney South Planning Panel 14 June 2017 determination on Close Street Canterbury (DA-503/2013/A) which included the following statement noting the lack of community benefit provided by a sizeable development:

“We note that developments of this size should provide a greater community benefit by way of community facilities and that future development in the area should take this into consideration and council should consider the demand generated by recent and future development on the supply of community facilities.”

We also cite Canterbury Council’s own S94A policy review which indicates Council has the resources to purchase less than two hectares of land when the identified need for new open space is over 30 hectares⁶. This is before taking into account the expected tripling of the Canterbury population between 2011 and 2031⁷.

⁴ <http://www.planning.nsw.gov.au/~media/Files/DPE/Reports/sydenham-to-bankstown-online-survey-results-2015-11.ashx>

⁵ https://gsc-public-1.s3.amazonaws.com/s3fs-public/2016_11_11_report_on_initial_phase_of_community_and_stakeholder_engagement.pdf?S3rGT_m1MzGpKzr3Lo9EqSjvteNxoFf3

⁶ <http://www.canterbury.nsw.gov.au/files/43a9c870-3ac2-4dbb-9a7c-a2620119a122/contrib-plan.pdf>

⁷ <http://webdocs.bankstown.nsw.gov.au/api/publish?documentPath=aHR0cDovL2lzaGFyZS9zaXRlcy9Db21tdW5pY2F0aW9ucy9QdWJsaWNhdGlvbnMvV2Vic2l0ZSBEB2N1bWVudHMvQ2FudGVyYnVyeS1PcGVuLVNwYWNILVN0cmF0ZWd5LUZlYjE3LnBkZg==&title=Canterbury-Open-Space-Strategy-Feb17.pdf>

The 35 hectare Canterbury Racecourse site is the last significant green field site in the catchment that can contribute to the Cooks River Open Space Corridor. The Cooks River Open Space Corridor is a Greater Sydney Commission Green Grid priority project for both the Central and South Districts with regional significance that aims to provide ‘high quality open spaces with links to nearby centres including... Canterbury...’⁸. As a regional project beyond the scope of one Council it is essential that an integrated and long term approach is taken to master planning this site that can involve the three tiers of government and potentially draw funds across portfolio areas and programs including infrastructure, sport, recreation, parks, landcare and other sources. The value of this type of approach to planning cities for the next century was advocated by Greg Hunt, Federal Minister for Health and Minister for Sport, in his January 2016 address to the Sydney Business Chamber:

“The liveability of our cities today is thanks to the vision and long-term planning of our forebears. Life is better for millions because of the parks, gardens and trees they imagined into being So as our cities inevitably expand, we owe it to our descendants to make the same provision for their recreation as our ancestors made for ours.”⁹

We look forward to your response.

Yours sincerely

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CC: Richard Colley, Administrator Canterbury Bankstown Council
Sophie Cotsis MP, Member for Canterbury
Tony Burke MP, Member for Watson
Scot MacDonald MLC, Parliamentary Secretary for Planning

⁸ <https://www.greater.sydney/digital-district-plan/715>

⁹ <http://www.greghunt.com.au/Media/MediaReleases/tabid/86/ArticleType/ArticleView/ArticleID/3623/Default.aspx>