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Greener Places
Government Architect New South Wales
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Greener Places, Draft Urban Green Infrastructure Policy - Comments

I welcome the important initiative from the Government Architect NSW to prepare an urban green infrastructure policy for NSW.

Having directly worked with planning and managing green infrastructure for over three decades as an environmental planner, I have extensive experience with developing and applying policy, and the many issues that arise. I have reviewed the discussion draft document on exhibition and wish to make the comments below.

Comments

The policy is very general, and must be able to be effectively implemented within local planning documents such as council development control plans. The high level principles should be reworded to enable them to be translated into area based objectives which can be applied at the site scale.

Much more focus needs to be given to the importance of biodiversity and natural ecological processes in the planning of green spaces. Extensive expertise and research is available to support integration of biodiversity in urban planning and design processes. Relevant terms relating to biodiversity need to be included in the glossary of the Greener Places document.

An important priority is to conserve and appropriately manage the natural environment in urban areas. The *Biodiversity Planning Guide for NSW Local Government* (National Parks and Wildlife Service 2001), of which I was primary author, is a useful reference

for integrating biodiversity in urban planning. This document identifies ecological planning settings within which different approaches to green infrastructure are required, based on the extent to which natural ecological processes operate. The principles and approach articulated in this document continue to be highly relevant, despite subsequent changes in related legislation. It would be beneficial to incorporate the concept of ecological planning settings from the *Guide* as a design action in Principle 3 of the Greener Places policy and in the glossary.

The extensive literature on planning and managing urban bushland in NSW appears to have been overlooked in preparing Greener Places, and should be referenced in the policy. Specifically, the objectives in State Environmental Planning Policy 19 (Urban Bushland) should be incorporated within the principles of green infrastructure.

The recently introduced regulatory framework for trees and vegetation in NSW under State Environmental Planning Policy (Vegetation in Non-Rural Areas) is unfortunately not conducive to achieving the policy objectives outlined in Greener Places. In fact it is counter productive in many cases. Improved consistency across government between policy objectives and the regulatory requirements is essential.

In terms of implementing Greener Places, it is suggested that specific reference be made to the importance of ensuring that green infrastructure is a key consideration at critical stages of the development process, especially in land subdivision. A specific implementation action should be added with principles and criteria for the subdivision of land, including protection of biodiversity, watercourses and natural areas in subdivisions and recognising management requirements for conservation land.

Conclusions

It is hoped that the proposals above are able to be integrated within the Greener Places policy when it is finalised.

Thank you for the opportunity to make comments on the draft green infrastructure policy. If you have any queries in relation to the details of my comments, please feel free to contact me at T 6571 1208 or E lep@calli.com.au.

Yours sincerely

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