



22 February 2018

Our Reference HC-23-11-3/02
Contact Susan Miles
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Greener Places
Government Architect New South Wales
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Attention: Barbara Schaffer

Dear Barbara,

CONSULTATION DRAFT GREENER PLACES POLICY

Thank you for the opportunity for Cumberland Council to provide comments on the Draft Greener Places Policy and the opportunity for our feedback to be considered in a final version which will be developed in early 2018.

The Greener Places Policy has been created to guide the planning, design and delivery of Green Infrastructure in urban areas across NSW. The following comments have been prepared by Council's Parks and Recreation and Environmental Planning sections.

- Council is very supportive of a NSW Policy document that provides a vision for recognising the importance for creating and improving green infrastructure in NSW
- Participation as one of the four key principles does not seem to correlate with the other three principles of multifunction, connectivity and integration. Consider other words instead of participation such as community. Participation/consultation is already a legislated process requirement for infrastructure development
- The terms Greener Places and Green Infrastructure are interchanged throughout the document and it is not clear why two descriptions are used and if they have different meanings
- While general information is provided on how the Greener Places Policy should influence the strategic planning framework, the Policy does not explain if further legislation or innovation will be required to implement the Policy
- Consider further emphasis in the Policy document on the requirement for long time frames for growing trees and plants and the maintenance of green infrastructure. Green infrastructure will also need to respond over time to changing climatic conditions and technology changes
- Private gardens are defined as green infrastructure however the Policy does not explain how low density residential areas can contribute to green infrastructure e.g.

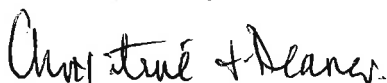
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opportunity for shade tree planting, surface water penetration etc. Within the Sydney Metropolitan Area and Cumberland Council LGA there is a significant proportion of land owned privately. This is especially important when looking at the Green Grid and connectivity between areas of greater greenery

- Agricultural and productive land is also included as green infrastructure. Consider the intensification of food production in NSW changing the value of this land as green infrastructure. The Policy has not addressed that many of these areas include glasshouses, shade structures, sheds and net structures.
- The Greener Places Policy should aim to target and inspire other professionals who have a significant influence on the built environment such as engineers and land developers, real estate agents and financial institutions
- Both government and industry often treat green infrastructure as a cost, not an opportunity to improve the liveability of our cities. Trees are not recognised as essential infrastructure the way grey infrastructure is. (AECOM, 2017, Pg.1) The Greener Places document discusses the important benefits to mitigating flooding and enhancing transport options. However it is necessary to put monetary figures onto such claims in order for industry to respond through market forces. One example of how value can be added to street trees (one form of GI) is through averaging house prices in relation to canopy cover. One study of a suburb in Western Sydney found a 10% increase in canopy cover showed an increase in the value of property of 7.7%. (AECOM, 2017, Pg.4)
- There is little to no actual direction for governance at the local level. E.g. no direction to the development of LEPs or DCPs with stricter guidelines with relation to Greener Places objective 1) to protect, conserve and enhance NSW's network of green infrastructure
- Consider including that in 2002, American Forests (a branch of the United States Department of Agriculture - USDA) identified canopy cover targets by land use. They recommended the ideal canopy to maximise the benefits canopy provides. The recommended canopy cover is 15% in central business district and industrial areas, 25% in urban residential and light commercial areas and 50% in suburban residential areas" (cited in City of Sydney, 2013, 3-7 City of Sydney. 2013. Urban Forestry Strategy. Sustainable Sydney 2030)
- The supplementary case studies are a relevant mix of local and international projects and provide inspirational examples for the Policy document. The case studies would need to be updated each year

Yours faithfully



Christine Deaner
MANAGER OPEN SPACE PLANNING & DESIGN