



23 February 2018

Government Architect New South Wales  
GPO Box 39  
Sydney NSW 2001

Dear Sir or Madam

**Subject: Submission on the draft Greener Places policy**

Thank you for the opportunity to comment on the draft Greener Places policy. A State-wide policy position that promotes green infrastructure as essential infrastructure is very welcome.

Council staff support the intent for green infrastructure to be a core planning policy requirement and integrated into all planning policy, rather than a separate initiative or strategy. A strategic approach to planning for and providing green spaces will help to deliver better outcomes and even better value into the future.

Below are comments and suggestions on the draft policy that may assist with refining the document.

**Principles**

The four proposed principles are succinct and simple and will help to maximise the value of green infrastructure projects.

**Approach and layout**

The content and approach of the policy appears to be generally well founded. The document provides an overall policy position for the State, while acknowledging that there is not a 'one-size-fits-all' solution to providing green infrastructure and that local stakeholders and communities should have input into creating local strategies and outcomes.

The document may benefit from being reorganised to make it even easier to read and understand. In particular, information about who prepared the strategy, the role of the Government Architect compared to other State government agencies, when and how to use the Policy and what the Policy does should be up front. While a lot of this information is already up front, some of it comes in the middle and back of the document.

**Biodiversity and ecology**

The focus of the Policy seems to be on 'urban' green infrastructure elements. However, an important priority for a green network must be to conserve and appropriately manage the natural environment, including biodiversity. This is a key issue for Lake Macquarie and for  
Our Ref:

many other local government areas in NSW. SEPP 19 – Bushland in Urban Areas provides objectives for protecting and managing urban bushland in NSW.

The 'biodiversity loss' section (p17) of the draft could be reworded so that it also seeks to 'contribute to biodiversity by conserving and rehabilitating existing habitats and corridors', as well as by providing new habitats and connections.

The Greener Places policy should acknowledge that urban expansion into natural and rural areas impacts the green network and reduces the environmental and amenity values of our urban areas. Local and regional plans should prioritise development in existing centres and redevelopment sites over greenfield areas.

Where greenfield development occurs, it must incorporate green infrastructure early in the process, including protection of biodiversity, watercourses and natural areas in subdivisions and recognising management requirements for conservation land.

### **A State-wide policy**

The document focuses = on the Sydney metropolitan area and context. To achieve the aim of being a State-wide policy, the document needs to apply and refer to a variety of land use contexts (e.g. inner urban areas, suburban and peri-urban locations, and regional towns and villages).

### **Potential conflicts with other infrastructure and private property**

Section 1.1 says that 'Green Infrastructure compliments ... other types of infrastructure projects'. While this is true in many cases, this is not always the case. For example, traffic and transport authorities often remove trees to protect road and rail users and avoid liability, while energy companies trim the trees near their overhead power lines.

Risk management can be a challenge for government in general. An overly risk averse approach can impede the delivery of a green infrastructure strategy, or result in suboptimal green infrastructure outcomes.

One of the implementation actions should look at the existing conflicts between the Greener Places policy and other infrastructure types. It would be useful if the implementation action explores regulatory and other changes to address these conflicts.

It would also be useful if the Greener Places policy provides a supporting tool that helps decision makers and communities weigh up the benefits of green infrastructure compared to the risks to other infrastructure and private property and people. The tool could also demonstrate how to minimise risks while maximising benefits.

### **Inconsistency between policy objectives and the regulatory requirements**

There are also often inconsistencies between policy objectives and regulatory requirements. For example, the recently introduced regulatory framework for trees and vegetation in NSW under State Environmental Planning Policy (Vegetation in Non-Rural Areas) is not particularly conducive to achieving the policy objectives outlined in Greener Places.. Improved consistency across government between policy objectives and the regulatory requirements is essential.

### **Walking infrastructure as green infrastructure**

Lake Macquarie City Council staff have been researching what it takes to create a walkable environment. It has become clear that providing additional pedestrian connections to open space is only one piece of a larger puzzle. Things like housing density, distance to a variety of destinations, the amenity of the surrounding environment and the slope of the land are all

Our Ref:

important factors of providing a truly walkable area.

During research into walkability, Council engaged Dr Rodney Tolley (Conference Director of Walk 21) and Stephen Burgess (MRCagney Pty Ltd) to host a series of events in March 2017. The objective of the events was to learn more about how we can improve walkability across Lake Macquarie and invite our community and other stakeholders along with us.

It became clear during these events that to increase and improve walking trips Council should focus efforts in and around our city, town and neighbourhood centres and public transport nodes (especially those with frequent and direct services). People are much more likely to walk if it is easy to walk to access their day-to-day needs.

Page 33 of the draft Greener Places policy contains a diagram indicating components that can be integrated across a green infrastructure network. It shows the pedestrian infrastructure as a long yellow line. While this may be representative of a recreational trail, it is not representative of the day-to-day walking to access local services, daily needs, school, and public transport that most people want to be able to do. It is therefore recommended that indicative 'pedestrian' connections be amended to show a network of connections around a centre. The indicative pedestrian connections should look similar to the 'street tree planting' component, with footpaths and street trees being highly complementary green infrastructure.

I would also recommend that you add another design action to the 'connectivity' principles, or amend design action 8, so that it seeks to 'enhance streets by providing footpaths in and around city, town and neighbourhood centres, frequently serviced public transport nodes, and schools'.

### **Create toolkits and case studies that align with the principles**

The proposed toolkits and case studies should provide guidance and examples of how to deliver on the principles in the draft Greener Places policy. The toolkits need to demonstrate how green spaces can be integrated, connected, multifunctional, and co-created by all stakeholders. They toolkits and case studies also need to be applicable to all of the green elements that are possible within the 'three-dimensional envelop that surrounds and connects buildings, streets and utilities'.

### **Toolkits**

The three proposed toolkits that will support the draft policy include:

- Open Space for Recreation
- Bushland and Waterways
- Urban Tree Canopy

The 'Open Space for Recreation' toolkit is likely to be very broad so that it captures all of the green elements that are possible within the 'three-dimensional envelop that surrounds and connects buildings, streets and utilities'. If this is the case, perhaps it should have a name that reflects the wide variety of uses it will cover, such as 'Green Space for People'. The name 'Open Space for Recreation' sounds like it would mostly apply to sportsfields and playgrounds. If the 'Open Space for Recreation' toolkit is predominantly for active recreation, there may be a need for further toolkits that address other uses otherwise not included in the three toolkits.

The three distinct toolkits will need to avoid unintentionally segregating uses, which would be inconsistent with the principles of 'multifunctionality' and 'participation'. If users only refer to the applicable toolkit, they may not realise opportunities to create a multiuse asset.

Page 50 of the draft policy says that 'the Department will work with state agencies and

Our Ref:

service providers to re-direct existing grey infrastructure funding to Green infrastructure alternative solutions, where they can be shown to be better performing by providing multiple benefits'. A toolkit that provides ways to measure the benefits, as well as guidance on how to integrate grey and green infrastructure would be useful.

It would be even better if the toolkits help to measure and quantify the proposed benefits of green interventions generally. This would help to build a business case for green infrastructure projects. The toolkits might also help maximise the return of investment.

### **Case studies**

There are four case studies listed in the draft Greener Places policy with more to come. The case studies should highlight a variety of projects, including small, medium, large and extra-large scale projects. The case studies should also cover a range of different contexts and green infrastructure types, and also from a range of different infrastructure providers. They should also demonstrate the principles of the Greener Places policy in action, by showing examples of connectivity, community participation, multifunctionality and integration.

### **Funding**

Council staff are supportive of the proposed implementation actions to review the existing green infrastructure funding streams and look into the need for new funding streams as well. Please ensure that the funding streams are available for places inside and outside of Sydney.

One of the key resources for delivering and managing / maintaining green infrastructure is the community, including volunteers and community groups such as Landcare and school communities. It needs to be clear throughout the Greener Places policy that community groups and members are intended users of the policy. Therefore, the 'stakeholders for Green Infrastructure funding' (p 50) should also include community groups.

Substantial green space opportunities exist on private land, so the private sector also has a crucial role to play in implementing the policy.

### **Evidence base**

A robust evidence base will be key to securing effective green infrastructure outcomes. The policy, implementation actions and toolkits should provide more guidance on the sort of evidence needed to support green infrastructure strategies.

### **Future users**

The needs of future users also need to be considered in the design of green space. The spaces should be designed to be adaptable and flexible.

### **General comments**

- In the 'what this draft will do' section, add another dot point to this section to make it clear that the Greener Places framework will provide implementation actions to achieve Greener Places in NSW.
- In the 'how will it help' section it says that the policy sets 'measurable outcomes' intended to be adopted by industry and government agencies, however these are not yet provided in the draft.
- The 'Why is this important' section for Principle 2 – Connectivity (p 34) could be amended to be less generic and more about the importance of connectivity to active transport with all of its associated benefits, and for the health, function and resilience of natural systems including waterways, foreshores, and native vegetation and native species habitat.

Our Ref:

- Page 46 refers to ISKA, but I could not find out what this meant in the document or online. Could it be explained, or added to the glossary?
- Section 1.2.1 talks about the role of green infrastructure in providing climate resilience. The draft says that 'the widespread use of water sensitive urban design practices will reduce the risk of flooding'. Should the word 'reduce' be replaced with 'manage', or else clarified, as a reduction may not always be the outcome.
- Elements of green infrastructure examples are given on page 12. These are presented in a way that appears to be comprehensive, but it should be noted that this is not the case. Stormwater reserves and foreshores could be added to number 8 and number 9 could be reworded to include food production on urban as well as agricultural zoned land. This could include food streets, vertical farms, and community gardens.

Lake Macquarie City Council would be pleased to be further involved in this project as it progresses and looks forward to adoption of the Greener Places Policy.

Should you require further information, please contact me on 4921 0316.

Yours faithfully

Hannah Benson  
**Strategic Planner**  
**Integrated Planning Department**

Our Ref: