

SUBMISSION: Greener Places Draft Policy

Name Withheld

I object to the draft Greener Places Policy (Policy) in its present form and note the following:

1. The Policy does not include any specific standards or targets or how the objectives will be monitored and measured. While it is indicated supporting documentation will follow, evidence based targets should have been released as part of the public exhibition process, so that informed public input can be made.
2. The Policy does not address the critical shortage of green space and inequity that already exists in cities such as Sydney. This needs to be addressed.

Greater Sydney is projected to grow by one million people over the coming decade, with nearly a 60% increase in population by 2050. However the Greater Sydney Commission's draft District Plans indicate much of the growth will be accommodated via high growth precincts. Many of these are already experiencing disadvantage in terms of open space and urban canopy cover; e.g Bankstown to Sydenham (B2S) urban renewal corridor. In response, as a minimum, evidence based targets should be defined, with green space targets set along with population and job growth targets to ensure minimum standards are set.

In addition, extra public reserve/open space should be set aside, (this may need to be acquired) to compensate for the increased density and loss of backyards and the like. Further, linear corridors along the railway corridor as proposed for the B2S urban renewal corridor do not provide adequate and quality green space.

3. The recently introduced Biodiversity reforms is a major barrier to successfully implementing the policy as it fails to adequately recognise the loss of mature canopies and green space.

Further, the rollout of many major infrastructure projects, and like for like offsetting does not address the loss of green space and urban canopy covers. This must be addressed.

4. Green rooftops and walls can reduce air pollution, have cooling properties and make for attractive vistas. They can also provide additional facilities for strata bodies.

However they provide limited habitats for insects and birds, do not mitigate flood risk, and have limited capacity in terms of being an adequate replacement for ground-level green space.

5. Codes SEPP expansion is a major barrier to successfully implementing the policy. Similarly SEPP 65 fails to ensure a minimal four hours of sunshine for green space survival, and or sufficient setbacks in order to maintain deep soils, thereby compromising the success of achieving better green infrastructure outcomes. This must be addressed.

6. Crown land reform is seeing the commercialisation and potential sale of public assets. This requires urgent review to protect green infrastructure.

7. The Federal Government's Strategy for Nature is currently on public exhibition. Likewise the Strategy fails to provide minimum standards and specific targets.
8. Given the obvious interrelationship between the Policy and Strategy, both documents should be reviewed to ensure minimal provisions are set.
9. The concept of 'multi-functionality' does not recognise the need for passive recreation and environmental conservation benefits. Instead the Policy relies on accessibility to green space vs setting minimum standards that address concerns around equity and liveability, particularly where high urban growth is forecast. Further there are concerns about shared green space as is currently being considered for Rhodes East.

In this case, a new school will be effectively be funded by the developer and built in a high rise development with the developer to fund an access bridge to a local park which will be used as a shared facility. This raises a number of issues, including equity and parity.

10. Notwithstanding key challenges with the concept, this document should at the very least provide sufficient detail rather than relying upon subsequent documentation.
11. The delivery of the Green Grid 'incrementally over decades' fails to prioritise green infrastructure necessary to respond to rapid population growth. It also fails to adequately provide sufficient green space to address the 'urban heat' effect.
12. The proposed funding models are inadequate and largely rely on developer contributions; e.g. the recently exhibited Master Plan for Camellia Town Centre relies on the developer contributions to deliver public space and green infrastructure via the Special Infrastructure Contributions Levy. This will see housing prices inflated and needs further evidence based research prior to finalisation of any policy.
13. Large scale development applications are typically modified over time, often with no adjustment made in terms of facilities, such as green space; e.g. Central Park, Chippendale. In this case the project undergone multiple modifications whereby the residential and visitor population doubled after the Concept Plan (no 2) was approved. Yet no additional green space was provided. As a result, the local area suffers from an acute shortage of green space evidenced by the overuse of facilities and growing number of social issues.

Likewise the redevelopment of local areas and introduction of planned precincts and growth corridors is likely to see local open space substantially reduced, with a reliance on regional facilities rather ensuring sufficient green space is provided locally. The issue of equity and minimal green space provisions particularly in high growth areas vs accessibility needs to be addressed. This should also include considerations in terms of access barriers, e.g. major roads and transport corridors.

Also further consideration should be given to ensuring access within a 200 metre area, where there are high density projects.

14. The concept of greenways is supported. However this should not be trade-off for sufficient local green space.
15. Over, recent years has seen a decline in trust in government and frustration in terms of what is effective community consultation (vs participation).

This needs to be considered as part and parcel of the policy, with minimum standards for green space set up front before the consultation process for major developments are considered vs population and job targets being set and green space objectives subsequently compromised. e.g. the redevelopment of the Waterloo Estate is likely green space substantially reduced when compared with the historic local provision, and historic minimum standards used by the City of Sydney, i.e. 6.6 sqm per resident, with 6.0 sqm for Green Square.

In short, the Policy requires considerable further work and should be re-exhibited for public input prior to being finalised.

Thank you for considering my submission.