



STEP Inc

Community-based Environmental Conservation since 1978

26 February 2018

Greener Places
Government Architect New South Wales
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Draft Greener Places Policy

STEP Inc is a local community-based environmental group, with a membership of over 400 in the Hornsby/Ku-ring-gai area. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensuring proper management of this bushland. Our group has considerable experience in environmental issues and regenerating and preserving natural bushland and native vegetation.

Thank you for the opportunity to comment on the draft Greener Places Policy. We strongly support the objective of the Policy “to create a healthier, more liveable and sustainable urban environment by improving community access to recreation and exercise, supporting walking and cycling connections, and improving the resilience of urban areas.” by the development of new Green Infrastructure (GI) and improvement and maintenance of existing GI.

The expression ‘resilience of urban areas’ needs more definition. The intention should be to improve the resilience of vegetation and bushland in urban areas, meaning resilience in the face of pressures from urban development and climate change.

We support the detailed submission prepared by the Total Environment Centre, in particular their comments on the lack of detail in the draft on implementation of the Policy. It is critical that:

- Implementation is coordinated against strategic targets for improvement over time in the quantity and quality of Green Infrastructure such as tree canopy coverage in each urban area including rural towns. These targets should depend on the starting point of detailed mapping of existing vegetation and setting objectives for future measures of factors that will define health of residents, liveability of urban areas and resilience and biodiversity of vegetation in streets, parks and bushland.
- Statutory provisions are legislated and administered that will ensure that the Green Infrastructure standards cannot be over-ridden by decision making processes of local councils or state government authorities.
- Adequate funding is provided for implementation; the proposal to provide funding from existing sources such as developer contributions and government grant programs cannot achieve the desired outcomes. GI will provide benefits in the long term financially, socially and environmentally and therefore is an investment for the future.

As STEP's interests lie mainly with the preservation of natural bushland we comment below on some aspects of the Policy relating to the protection of our natural bushland environment and species habitat.

Targets for retention of bushland

Urban bushland outside national parks plays an important role in the continuing survival of all aspects of biodiversity. Planning has to support the survival of our unique biodiversity and not simply focus on endangered species and ecological communities, otherwise the status of biodiversity will continue to decline.

Many suburban areas in Sydney and other centres contain areas of bushland varying in size from small pockets to quite significant areas that are managed by local councils or are Crown Land. These areas need to be maintained as they play many essential roles. For example they contribute to the level of tree canopy cover with all its benefits as documented in the Policy draft. They act as wildlife corridors that support resilience of species by allowing movement to waterways and between natural areas.

Animals need adequate foraging areas. The manual/toolkit to be developed by the Government Architect on bushland and waterways should be based on scientific analysis. For example, research on the needs of the vulnerable Powerful Owl has shown that urban density affects the needs for foraging area. The fewer the available foraging patches, the larger the territory size needed to support foraging. In highly dense urban environments owls use a 10km radius around the core territory to successfully support foraging (Bain et al, 2014).

Urban bushland is under considerable pressure due to its proximity to residential development, for example damage is caused by erosion and pollutants carried by stormwater and weed invasion. Climate change will exacerbate these pressures. Bushland areas need to be large enough to mitigate edge effects.

Bushland is therefore an essential part of Green Infrastructure that should be given strong support in the Greener Places policy.

Factors that will reduce bushland

The Policy should address issues that arise under current legislation whereby areas of natural vegetation are being progressively destroyed. There is limited assessment of cumulative impacts of land clearing for development. Decisions are being made in a variety of jurisdictions (local councils, government departments) without consideration of the effects of other past and future infrastructure developments and housing targets in the same region.

Some provisions under the Biodiversity Conservation Act will allow uncontrolled loss of GI. These include the ability to progressively clear small areas of land without requiring approval in some council areas and the variation rules and possibility of cash payments under the offset provisions. Local council DCPs should be amended to tighten controls.

The loss of bushland and habitat is particularly apparent in rural and semi-rural areas where the current approach is the clear large sub divisions without leaving any vegetation. Examples are in north Orange, Mollymook in the Shoalhaven and Catherine Hill Bay (see photo). Once the houses are built it will take many years for replanted trees (if any) on private land or street verges to grow large enough to provide habitat of any value to wildlife. It should be possible to create sub-divisions that maintain some existing vegetation.



Urban Tree Canopy

The draft Policy does not recognise the importance of existing urban trees, especially mature ones. It is acknowledged that it is necessary to remove trees if they become dangerous. Councils should have a program to identify trees that are likely to need removal and plan for their replacement over time.

It is not reasonable to assume that GI will only be provided on public land. Private land owners should also be responsible for managing GI. Tree Preservation Orders are an important means of ensuring that existing tree canopy is maintained.

The process of approval for tree removal should consider whether a tree contains hollows and their removal should be avoided if at all possible. Tree removal on development sites should be kept to the minimum possible. It seems the standard practice is to clear virtually all the building site. If possible if redevelopment is planned for a large area, with apartment buildings next to each other consent authorities should try to coordinate the location of green space on each site so that the spaces can effectively be combined. Is it really necessary to put high fences between apartment blocks? Residents as well as wildlife would appreciate a broader area of community space.

Building design regulations need to ensure that there is sufficient curtilage to ensure that there is room for tree planting. The design of apartment buildings with underground parking should ensure that there is sufficient deep soil for trees to survive. Excavation of parking space should cover a smaller area than the building footprint.

Development consent conditions for planting of vegetation should include provision for future monitoring of compliance with vegetation maintenance requirements.

Error in draft – page 17

On page 17 there is the statement. 'By 2036, the number of residents aged 0-19 years will have increased by more than 2.4 million people, an increase of 24 per cent.' This should read "By 2036, the number of residents aged 0-19 years will have increased **to** more than 2.4 million people, an increase of 24 per cent.'

Reference

Bain, D., Kavanagh, R., Hardy, K. and Parsons, H. (2014). The Powerful Owl Project: Conserving owls in Sydney's urban landscape. BirdLife Australia, Melbourne.

Yours sincerely

Jill Green
President