

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

23 February 2018

Dear Mr Poulet,

**Re: Response to the Draft Greener Places Policy**

Thank you for the opportunity to provide feedback to the draft *Greener Places* policy as prepared by the Government Architect NSW.

WSROC recognises the key role that the planning system can contribute to support community liveability and resilience. Councils take great responsibility in ensuring that current and proposed developments deliver well designed urban spaces that are fit-for-purpose, promote healthy lifestyles, increase community resilience, improve social cohesion, and provide essential services required by local residents. We specifically recognise how urban green spaces contribute to this.

Many studies have referenced the role geography and urban planning can play in facilitating healthier, more resilient communities. Currently Western Sydney residents already face longer commutes to work, suffer higher levels of preventable, lifestyle related illness and have less access to green space than their counterparts in other areas of the city.

As demonstrated in the draft Policy, the lack of green spaces is particularly apparent urban developments in Western Sydney. This compounds the health and liveability issues as mentioned above. There is an urgent need to increase green space to safeguard and enhance biodiversity and create more resilient and healthy communities. WSROC therefore welcomes a more coordinated approach to integrating green spaces into our urban environments.

Of particular concern to WSROC is the increasing effect of urban heat. Urban heat isn't only a problem for Western Sydney, but it does have a particularly significant impact due to the region's existing climate, its large and growing residential population, deficient infrastructure, geography and the ongoing high levels of rapid urban development.

Urban heat is already impacting the infrastructure and services that shape our communities as well as the people living and working within them. These impacts will worsen if we don't change the way we plan and manage our region. WSROC, together with other stakeholders across government, business and community sector, acknowledge the urgency of the need for action.

As such, WSROC strongly supports the intent of the *Greener Places* policy. We specifically reiterate the importance recognising green and blue infrastructure as essential infrastructure and to the need to embed green and blue infrastructure delivery into the NSW strategic planning framework. These are also some of the key recommendations through WSROC's Urban Heat Strategy which was

developed in consultation with a range of stakeholders including government (state and local), GSC, Resilient Sydney, Western Sydney Local Health District, universities and business.

WSROC has the following additional recommendations to the draft Policy:

**1. Need for a *Greener Places* State Environmental Planning Policy (SEPP)**

WSROC expresses concern about the current rapid developments in Western Sydney that do not prioritise green and blue infrastructure. We urge the state government to ensure greening and WSUD are considered at the onset of any planning process, including minimum requirements. We advocate for a *Greener Places* State Environmental Planning Policy (SEPP) to be developed which would include a strong focus on Urban Heat Island Effect issues.

**2. Need for urban greening expertise in decision making**

Following from the previous point, we reiterate again that ensuring greening is embedded in the very early stages of planning is essential in order to transform our communities. WSROC advocates for urban greening expertise to be included in planning panels, such as the proposed mandatory Independent Hearing and Assessment Panels (IHAPs). This would assist in optimising opportunities for consideration of greening in large developments and planning proposals.

**3. Ensure sufficient resourcing for implementation**

Sufficient resourcing and support should be allocated for implementation of the policy. This should include appropriate funding to Local Government. We urge the NSW Government to consult closely with Local Government to determine the optimum solution for implementation. As identified through the strategy, *Greening Places* is a work of collaboration, Local Government should therefore be consulted from the onset to be able to flag any issues and establish true collaboration in order to maximise outcomes.

**4. Need for common datasets and methodologies**

To ensure we prioritise the optimum location and types of green and blue spaces, sound data is critical. WSROC understands that different stakeholders use different data sets to identify green cover and make decisions as to where to prioritise greening. We understand that the outputs from these datasets do not always align. It is thus becoming increasingly important that we agree on common datasets and methodologies for greening and urban cooling to ensure evidence based decision making. A common dataset should ideally include the interaction of elements such as greening, buildings, pavements and roofs.

**5. Establishing baseline and clear methodology for measuring success**

Measuring success and ensuring accountability of the implementation of the policy is reliant on establishing a sound baseline for measurement. It is critical to know what we are measuring to determine success of the policy. This includes agreement on the meaning of used terminology (such as the Green Grid, Green Corridors, Green Networks, etc.).

**6. Guidance and resourcing for Urban Canopy implementation**

WSROC understands that an Urban Canopy cover toolkit is currently being developed to support the Policy. WSROC would like to highlight the following,

- We acknowledge and support that *Greening Places* is not a blanket one size fits all approach and greening strategies are to be flexible in order to maximise outcomes for different urban landscapes and communities. However, we ask the Government to include evidence based guidance on implementation of urban canopy, including guidance around species selection and location prioritisation, to ensure the right

tree is planted in the right place for maximum effect. E.g. urban cooling might be key priority for build-up areas, whereas for green corridors biodiversity is likely to be top consideration. The urban area and green corridor might therefore require different tree species.

- We urge the Government to ensure appropriate resourcing and support is made available for the implementation of Urban Canopy. This should include maintenance and community engagement activities to ensure programs are effective.

**7. Better focus on wildlife habitats**

*Greener Places* should include focus on wildlife habitat creation and offer some initial practical ways of doing this.

**8. Include mention of Biodiversity Stewardship sites**

The *Greener Places* Policy should make mention of the Biodiversity Stewardship Sites and their promotion by landowners, including local government.

WSROC understands that the Policy will be supported by specific toolkits and manuals. WSROC and its member councils look forward to seeing further detail and being consulted throughout the process as we acknowledge that sound implementation support is critical in getting the best possible outcomes for our communities.

WSROC supports the work of NSW Architects to create greener and more resilient urban areas, and we are willing to assist the Government in any way we can.

For further information regarding this submission, please contact Judith Bruinsma on 02 9671 4333 or [judith@wsroc.com.au](mailto:judith@wsroc.com.au).

Yours sincerely,

**Charles Casuscelli**



**Charles Casuscelli**

**Chief Executive Officer**

**Western Sydney Regional Organisation of Councils**