

26 February 2018

Mr Peter Poulet
Government Architect
Level 24, 320 Pitt Street
SYDNEY NSW 2000

Dear Mr Poulet,

Re: Submission into Greener Places Draft

The Urban Development Institute of Australia (UDIA) NSW is the leading property industry group promoting the responsible growth of this State. Our advocacy is based on making our cities more liveable, affordable and connected. UDIA NSW supports the goal of making cities more liveable and enhancing greenspace in the city; however, affordability is a critical element of liveability and must be supported when developing planning standards.

Greener Places establishes various broad principles for green infrastructure; however, we would welcome the opportunity to review the proposed supporting Design Manuals and provide comment once these become available.

We do not oppose the broad principles for green infrastructure, and we see the need for green infrastructure to be integrated, connected, multifunctional, and participatory. Developers invest a great deal of time and effort building communities for people to live, work and play including providing green infrastructure along with parks and playgrounds. However, we have significant concerns about the implementation and the likely impacts on cost from extending green infrastructure.

We recognise there are balances between affordability and amenity that need to be maintained, and the affordability of housing, particularly in the context of uncapped section 94, new SICs, and new biodiversity offsetting regimes, needs to be assessed on a cumulative basis.

Greener Places will likely add costs to development, the funding mechanisms are mainly uncapped section 94 and SIC. The beneficiary of green infrastructure is the entire community, so isolating new residents is inappropriate, the infrastructure should be funded by the entire community.

Many Green Infrastructure items are managed by local government in the long term, this can mean that ongoing cost can be a barrier to well-designed greenspace. We would consider in most instances the responsibility for ownership and maintenance for additional green infrastructure would fall to local government. It is critical local government receives the necessary support to enable growth and government support beyond the Open Space/Healthy Living trust fund would likely be required.

Many councils use the outdated 1929 standard of 2.83ha per 1,000 residents to calculate open space provision, which does not consider many mixed-use areas such as riparian corridors and bushland areas. There is an opportunity to develop standards for the provision of open space and green infrastructure that are relevant for the development of Sydney as part of the *Greener Places* design manuals. UDIA

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NSW would be keen to assist in the development of an appropriate standard for the open space and green infrastructure.

Further to developing standards for the provision of open space and green infrastructure, we consider standards relating to cost and the level of embellishment of open space and green infrastructure could be developed as part of this process. Standard rates should be applied to embellishment and management of these areas based on best practice. We consider this will also serve to provide for consistency between SICs and S94 plans across Sydney, while also supporting housing affordability. We would welcome an independent panel, perhaps IPART or another suitable body, conducting the benchmarking exercise with extensive industry involvement.

Improving clarity, developing consistency and an implementation pathway will ensure the success of *Greener Places*. We recommend:

- Providing certainty to industry with clear standards and metrics,
- Developing clear minimum standards and metrics for green infrastructure, while recognising Sydney's affordability challenges,
- Defining subjective criteria such as 'high quality' and value', to provide improved consistency across local government areas, and
- Further consultation with industry on the consistent implementation of the policies and supporting documentation, responsibility for ongoing ownership and maintenance, and affordability and commercial considerations.

UIDA NSW is keen to participate in the development of the supporting toolkits that will be critical to the policy's implementation. Please contact Justin Drew, General Manager, Policy and Corporate Affairs on 9262 1214 or at jdrew@udiansw.com.au if you wish to discuss these issues further.

Yours sincerely



Steve Mann
Chief Executive

The Urban Development Institute of Australia (UDIA) NSW is the leading property industry group promoting the responsible growth of this State. We have over 500 company members and more than 3,000 of their employees attend our events, sit on our committees, undertake training or are involved in the activities of the organisation on an annual basis. Our organisation is the oldest property development advocacy group in the country, having been established in 1962. Our advocacy is based on making our cities more liveable, affordable and connected.