

26 February 2018

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

Dear Sir or Madam,

Submission to the draft Greener Places Policy

Thank you for the opportunity to provide comment to the NSW Government Architect's *Greener Places Policy* ('the Policy'). Please note that this submission has not been endorsed by the elected Council and is the opinion of Council Officers.

The submission provides feedback on the policy's principles and identifies projects that Waverley Council is undertaking that are relevant to the policy.

Should you wish to discuss any aspect of this submission in further detail please contact Gabrielle Coleman, Strategic Planner on (02) 9083 8194.

Yours Sincerely,



Sara Stace
Acting Executive Manager – Shaping Waverley

Waverley Council Submission to the draft Greener Places Policy

Council commends the NSW Government Architect's Office for establishing the first green infrastructure policy in NSW. Alongside the recently released *Better Placed Policy*, Council supports the strategic thinking behind advocating for high quality outcomes in the NSW built environment. The policy is seen to be a broad ranging framework with well-intentioned ideas and objectives to guide work in green infrastructure across all levels of government and relevant stakeholders. Green infrastructure is undoubtedly beneficial to our communities and Council supports embedding green infrastructure in the NSW strategic planning framework. There are no significant criticisms on the overall direction of the policy.

Policy Principles

In principle Council supports the four principles stated the draft policy, however we note that the principles are broad in nature and may not be applicable to some elements of green infrastructure. Multifunctionality is desirable, however it needs to be recognised that not all green infrastructure is 'multifunctional' and its primary value may be for recreational and or ecological values.

The Participation principle includes 'encourage the use of currently underutilised open space corridors.' These 'underutilised spaces', meaning underutilised by humans, could currently be wilder places that are last refuges for fauna.

Barriers to Implementation

Council shares the same desire to create greener places and contribute to the Green Grid, however the policy fails to acknowledge the challenges in doing so. Some of the most common challenges are noted below.

The policy should work towards encouraging a perception change of green infrastructure in the private development industry and local communities. Whilst councils can do what is in their power to facilitate such work on public land, enforcing the protection of flora and fauna is a grey area on private land. This is due to the perception that flora is secondary to hard infrastructure. This could be addressed through statutory measures at a SEPP or LEP level, in addition to the EP&A Act 1979 as mentioned in Section 3.1 of the Policy.

Section 3.5 on funding identifies existing funding mechanisms. Council strongly supports the proposal to conduct an audit of all existing funding programs to understand their extent, purpose, triggers and timing to identify potential opportunities for coordination, and gaps.

It is recommended that green infrastructure should be recognised by NSW Government Treasury. Green infrastructure is currently not recognised as a depreciable asset, which directly impacts the asset valuation and the subsequent provision for asset management, maintenance and renewal. It needs to be valued as an asset with equal standing as buildings, roads and services. This would include assigning a monetary value to all urban trees using an accredited tool so that the full cost of removing trees can be recognised to influence decision making. It would also record the increasing asset value

of trees as they mature. The asset value of public parks and open space should also include community health benefits, environmental services and climate change mitigation.

While the draft policy identifies three existing sources for funding Green Infrastructure, which include grant programs, Council Section 94 contributions plans and Special Infrastructure Contributions (SIC), Council considers that the level of funding currently available is not adequate to effectively implement the objectives of the policy. Additionally, there is inadequate coordination between the various funding sources to make the most effective use of the limited funding available.

Council supports the intention to investigate new funding streams. Council strongly encourages conducting a needs based analysis to assess where existing funding sources should be increased. The funding sources listed include Metropolitan Greenspace Program, Environmental Trust grants program and Sydney's Walking Future and Sydney's Cycling Future programs. However, the current level of funding under these programs is low compared to what is likely to be required to meet the objectives of the policy for the Greater Sydney area.

Specific to the Waverley LGA, is balancing the high demand and usage of our existing green infrastructure with our resource realities. This is directly related to funding. Council's asset management is intensive and the asset lifecycle is greatly reduced by this high demand. The high volume of visitors to the LGA places immense pressure on green infrastructure. Direct revenue streams cannot keep up with managing, maintaining and renewing these vital assets.

Green space on private land

The protection and increase of green space and canopy on private land is very difficult. While Waverley LGA has been developed for many decades, in fill development and increased density is resulting in the loss of trees and greenery such as in backyards. There is minimal scope for Council to halt this loss in greenery.

Monitoring and reporting

Monitoring and reporting is often overlooked and Council agrees that this is essential. It would be extremely beneficial for Council and all stakeholders if data from monitoring is made publicly available at a higher frequency than at the final stage when an annual report/implementation plan is released.

Waverley Council Projects

The NSW Government Architect's website notes that "sharing and developing case studies that exemplify the qualities we look for in assessing design excellence is a way to demonstrate the values by which we measure and evaluate." Below are some of Council's projects that have contributed to making the Waverley LGA a 'greener place.'

- **Biodiversity Action Plan – Remnant Sites**

http://www.waverley.nsw.gov.au/__data/assets/pdf_file/0006/81186/Biodiversity_Action_Plans_Remnant_Sites_March_2015.pdf

A key aspect of having Greener Places is ensuring that existing green spaces are protected and where possible increased. Waverley, like other Councils, actively protects and improves the quality of our remnant bushland areas.

- **Bushland and habitat restoration activities**

http://www.waverley.nsw.gov.au/environment/bushland_and_wildlife

In Bronte and Tamarama Gully Council has long term projects to restore native bushland similar to what once occurred there. These are not remnant areas, so Council is creating areas of diverse floral biodiversity that significantly increase the greenspace in Waverley.

- **Raingardens and Water Sensitive Urban Design (WSUD) infrastructure**

A key way in which green space in the urban environment can be increased is through raingardens and bioretention schemes that incorporate vegetation plantings. Examples of this such as in Bondi Junction have created green oases in and around previously impermeable spaces. As well as providing a water pollution reduction benefit the additional green spaces have a major cooling component.

- **Green Links Pedestrian Network**

http://www.waverley.nsw.gov.au/environment/sustainable_transport/walking/green_links_project

The Green Links Pedestrian Network is an integrated network of pedestrian links throughout the LGA, providing recreational opportunities for local residents and visitors, as well as providing links to schools, shops, beaches and transport. The walks are aimed at improving public health and reducing car use for transport. They are an easy way to get around and experience Waverley's parks and historical sites. The walks connect with other picturesque walks in Centennial Park or the coastal walk from Bondi to Bronte Beach. Council is also greening the routes through tree planting.

- **Play Space Strategy**

http://www.waverley.nsw.gov.au/recreation/parks/play_spaces

Play is essential to the health and wellbeing of all children. Play supports growth in creativity and imagination, builds emotional, creative, sensory and cognitive development, physical strength, coordination and balance. It can also provide opportunities for children to develop confidence in themselves to manage physical and social challenges and a sense of connection to a place, peers and their local community and environment.

Waverley Council Play Space Strategy is a strategic plan outlining the steps to the improvement of the forty playspaces managed by Council. The strategy aims to improve the recreational value of the existing open space in the Waverley Council Local Government Area. The strategy also identifies the gaps in play recreation and provides actions to resolve issues recognised.

- **Various Plans of Management**

In keeping with the Local Government Act, Waverley Council has various Plans of Management in place for the management of its greater than 100 hectares of open space. Regional significant parks such as Bondi, Tamarama, and Bronte have location specific plans of managements to outline management practices and provide actions for incremental improvements for these internationally recognised parks. The current active plans of management include:

- Bondi Park, Beach and Pavilion Plan of Management
- Tamarama Park Plan of Management
- Bronte Park and Beach Plan of Management
- Waverley Park and Pavilion Plan of Management
- Thomas Hogan Reserve Plan of Management
- Coastal Reserves Plan of Management

- **Council strategies under preparation**

Council is currently preparing and planning a number of strategies relevant to the Greener Places Policy, including:

- An Open Space and Recreation Strategy with targets to achieve adequate open space for active and passive recreation that is well located and connected. As one of the densest urban areas in Australia, this is a key priority for Council.
- Ecological Restoration Plan at Thomas Hogan Reserve
- Coastal Bushland Restoration Plan to increase coastal bushland at up to 12 hectares of areas in Waverley creating low maintenance, high quality native habitat areas.
- An Urban Forestry Strategy to include tree canopy targets, wildlife corridors, and shade for open spaces and to encourage active transport along roads and pathways.
- An update to the Street Tree Masterplan to increase tree and shrub planting, and to support the Urban Forest Strategy.

Next steps

Council looks forward to the release of the Greener Places Manuals – Bushland and Waterways, Open Space for Recreation, Urban Tree Canopy. Concepts and guidelines can only take implementing action so far. It is envisaged that these documents will have more specific and concrete actions for how all parties will or are expected to contribute. Council will be willing to provide more specific comments on these draft documents upon their release.