



26 February 2018

F00678 (18/41132)

Department of Planning and Environment  
Greener Places Draft Policy  
On-line submission

Dear Sir/Madam

**SUBJECT                      Submission on Greener Places Draft Policy**

Council appreciates the opportunity to make a submission on the above proposed policy. As outlined in the exhibition material, the draft Policy has been produced by the Government Architect NSW to guide the design, planning and delivery of Green Infrastructure in urban areas across NSW to create a healthier, more liveable, more resilient and sustainable urban environment.

Blue Mountains City Council supports the above aim of the draft Policy and sees the recognition and elevation of Green Infrastructure at a policy level as a commendable objective. A general comment is the Policy has a Greater Sydney (and Green Grid) focus for one that is to "set a standard for the whole of NSW". Also, it is unfortunate draft manuals and toolkits referred to throughout the document are not available for comment as this may have expanded an understanding of the draft Policy.

Further constructive commentary and observations are provided below against the main headings in the draft Policy.

Introducing Greener Places

- While it is acknowledged the focus of the document is on urban spaces, the impact on rural land and National Park (particularly as a whole of NSW policy) is not well referenced in the document. There are different objectives for green infrastructure that link urban places and those that link urban spaces with rural and National Park areas. The important and relevant distinction between these has not been articulated in the Policy.
- It is not clear in the Policy if there is a recognition of native versus non-native green places or the role that each can play in the provision of green infrastructure. It is noted that bushland may be a catch all descriptor for native vegetation but again, this is not clear.
- There is no mention of the Greater Blue Mountains World Heritage Area in the Policy and the more general term of National Park is mentioned infrequently.
- The important role that private residential space, the predominant land ownership pattern in urban environments, is not particularly acknowledged. The role of private gardens in mid-block planting and landscape street settings offer a range of benefits that are well known in the literature. This appears an oversight, particularly as it is proposed that urban canopy coverage be a measurable indicator of urban bushland and private residential gardens will form a large part of the measurement. Also, the planned development of DCP clauses implies that private development is considered in the Policy.

- With the absence of a specific focus on private residential or rural lands a number of key impacts on these areas are not mentioned. Of particular importance is the impact that the *10/50 Vegetation Clearing Code of Practice* has on the amount of urban green space, along with the introduction of the *SEPP (Vegetation in Non-Rural Areas)* and the *Biodiversity Conservation Act* and their impact on the amount of vegetation in both urban and rural areas.
- Under the listed benefits of green infrastructure there is no mention of heritage listings, higher design quality through the integration of landscape elements to developments or climate change adaptation. Further the economic benefits of tourism and green infrastructure extend well beyond the provision of facilities.
- As a Council with a large area of public and private green infrastructure, the Blue Mountains is particularly well suited to provide case studies to illustrate the development of manuals and toolkits. Examples include green infrastructure works along the Great Western Highway, the Street Tree Masterplan, Lawson Town Centre Redevelopment and Hazelbrook Carpark.

#### Creating Greener Places

- A review of funding opportunities is welcome, but a broader view is suggested taking into account funding opportunities for open space for recreation for sporting and recreation facilities at a regional and local level, as well as natural area restoration and protection delivered through other government agencies.
- There appear to be some gaps in the type of infrastructure funded by the different grant programs e.g. amenities, parking signage etc for rock climbing areas.
- As the Policy and some of the funding programs cover the whole of the state it would also be useful if priorities are informed by current health and active participation statistics. For instance, lower health outcomes are currently evident in many outer metropolitan and regional areas, and these can reflect access to paths for walking and cycling and affordability or time to access active pursuits.
- Increased planting alongside utility services is not consistent with the reality of a crowded public footpath corridor where the requirement for significant root ball space is regularly compromised by utility providers.
- The major role of the Rural Fire Service in the provision of urban canopy is not acknowledged in the Policy. Urban areas mapped as Bushfire Prone Land require that agency to be consulted and *Planning for Bushfire Protection* is a guideline affecting the amount of vegetation to be retained on a site.

#### Implementing Greener Places

- Although the importance of statutory measures is acknowledged, the role of the Policy in the development assessment process has not been articulated. LEP provisions, alongside DCP provisions, would elevate the consideration of green infrastructure in this process.
- Consideration needs to be given to those Councils, such as the Blue Mountains, who already have strong and well-structured LEP and DCP controls regarding the retention of vegetation in urban areas, that more generic model clauses are not introduced at the expense of these locally relevant and appropriate clauses.
- Monitoring and Reporting appears focused on a key measurable of urban canopy coverage. As previously mentioned, the role of the *10/50 Vegetation Clearing Code of Practice*, *SEPP (Vegetation in Non-Rural Areas)* and the *Biodiversity Conservation Act* on the area of urban canopy coverage on private land falls outside this Policy. It could be that this measure would show a decrease in canopy area through the operation of these other instruments, and this needs to be considered in the reporting process.

I would welcome the opportunity to discuss this further, and can be contacted on 4780 5591 or [kbarrett@bmcc.nsw.gov.au](mailto:kbarrett@bmcc.nsw.gov.au).

Yours faithfully

A handwritten signature in black ink, appearing to be 'KB' or 'K.B.', written in a cursive style.

KIM BARRETT  
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