



26 February 2018

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

Dear Mr Poulet,

RE: Government Architect NSW Draft Greener Places Policy

Lendlease Communities welcomes the opportunity to provide comments on the draft Greener Places Policy developed by GA NSW, and looks forward to working with the NSW Government on further refinements and implementation to the benefit of the whole community.

Lendlease is a leading international property and infrastructure group. NSW and in particular Greater Sydney is a key investment market for Lendlease: we have operated here for more than 50 years. Our vision is to “create the best places” and whether they be master-planned communities, hospitals, retirement villages, railways, roads or key urban renewal sites – the vision remains at the core of all we do.

The draft Greener Places Policy highlights the importance of the “Green Grid” to the Greater Sydney Commissions District Plan and subsequent Council LEP’s. An integrated well-planned and maintained open space network with equitable access to multi-faceted assets is essential to the overall health and well-being of the community. It enables community interaction on many levels, provides relief from the surrounding urban environment, provides habitat for native fauna and flora, and is a strong visual link to native country and heritage.

Many master developers focus heavily on engaging with local community, local councils, and federal and state environmental legislators to plan for and to deliver essential green infrastructure. The community are discerning of the design and amenity provided and value quality assets as important drivers to deciding where they may live and work. Many local councils and government authorities also lead the way in delivering high quality valued open space such as the City of Sydney and the Western Sydney Regional Parklands.

Housing Affordability

In assessing any new policy, it must be undertaken in the current context of housing affordability in Sydney in particular. The draft Greener Places Policy is at risk of providing more pressure on house and land prices in new and established communities, through potential increased maintenance costs, as well as increased “green infrastructure” land purchase and embellishment costs for additional environmental reserves and riparian corridors.

The nominal land value of essential green links and corridors should not be burdened on developers without a managed framework in place to determine equitable valuations. As it is not land that cannot be developed typically, the cost of this land should be negligible, and consistent across all jurisdictions.

Asset Ownership

The approach and acceptance of the community's desire for quality open space systems to include activated bushland areas and riparian corridors is recognised, but not consistently managed across all jurisdictions. In some councils, ongoing liability and maintenance costs is

nominated as a barrier to the council acceptance of bushland areas and riparian corridors as assets that councils should own and manage in perpetuity on behalf of the community.

The Greener Places policy should clearly articulate that it is **mandatory** that riparian and bushland reserves are owned by the Crown, and managed on its behalf by the local council following the successful rezoning and delivery of surrounding developments. Private ownership in perpetuity of these important assets is not the solution.

Asset Management

The majority of local councils also focus on the lack of an effective recurrent maintenance budget as the main barrier to the delivery of a quality open space network. The draft Greener Places Policy is at risk of effective implementation should local authorities not commit to effective recurrent maintenance budgets that focus on providing a quality open space system that improves the health and well-being of their community, reduces heart disease, obesity and mental health issues.

Quantifying and Distribution of Local Active and Passive Open Space

Current policy across NSW is not firm on how this is to be determined, and currently outdated guidelines such as requiring 2.83Ha of local open space per 1000 persons is utilized. This guideline does not take into account the balance of the Green Grid, such as riparian corridors and bushland reserves, and how they may contribute to and support the delivery of the local active and passive open space network through activation such as cycle paths, walking trails, picnic nodes, interpretive nodes and the like.

Determination of a clear policy will enable early physical green space planning, and the early establishment of funding arrangements to support the sustainable management of these community assets.

Open Space Amenity and Residential Density Nexus

Best practice residential development provides for development controls that support increased residential density around and adjacent to quality urban amenity such as village and town centres, public transport infrastructure and activated open space.

The Greener Places Policy should articulate a defined nexus between the hierarchy, size, location and embellishment of open space and residential density. Increased density should be promoted and supported where higher quality amenity is provided. The definition of “activated” should also be clearly articulated as in some jurisdictions this is cause for debate.

Greener Places Design Manuals

These comments are provided without the benefit of reviewing the proposed supporting Design Manuals (Urban Tree Canopy, Open Space for Recreation and Bushland and Waterways). We welcome the opportunity to provide further comment on these key documents when they become publicly available.

Key recommendations are:

1. The Greener Places Policy seeks to establish an NSW Open Space/Healthy Living Trust Fund or equivalent with local councils benefitting from the interest and investments solely for the purpose of providing additional open space maintenance funds across their community.

A grant program is short term and is typically focused on the establishment of new open space programs and capital expenditure. Whilst still viable, these programs do little to ensure high quality maintenance over time, and access to additional funds is required.

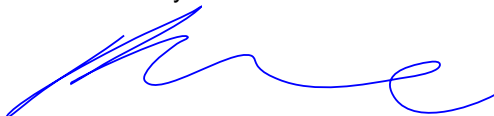
2. The Greener Places Policy mandates that land title of essential Green Infrastructure such as riparian corridors and bushland conservation areas be transferred to the crown, with local councils responsible for ongoing maintenance and management in the best interests of the local community. It is not an appropriate nor sustainable outcome that these assets are left in private ownership.
3. SIC's and S94 Plans facilitate the embellishment and establishment management for a period of time (2 years typically) for all open space including riparian and protected bushland, prior to handover to local government. Standard rates should be applied to embellishment and management of these areas based on best practice. Establishing these standard rates should be determined by an Independent Assessment Panel, and SIC's and S94 Plans should be capped to ensure that further pressure is not established on the cost of providing more affordable housing.

Land values of essential green links and corridors should be determined within a managed framework recognizing that this is land that cannot be typically developed.

4. The opportunity to deliver open space embellishment by reputable developers as "works-in-kind" should be maintained within the framework of SIC and S94 plans. The ability to negotiate a "better outcome" or site specific VPA with local authorities in lieu of a S94 Plan should also be maintained. These processes enable greater flexibility to respond to community needs, and provides for the timely delivery of open space amenity to support new communities. Both processes are well-established in the industry.
5. The Greener Places Policy should articulate the best practice scenario for the quantifying and distribution of local passive and active open spaces for any new development precinct, recognizing also the benefit of riparian corridors and bushland areas. It is important for the community to have an equitable distribution and access to these assets, from Regional Active Sporting Grounds to town squares and plazas, to local and neighborhood parks and activated bushland and riparian corridors.

We trust that our comments can further contribute to this important debate. Please do not hesitate to contact Paul Melrose on paul.melrose@lendlease.com should you require further information or clarification.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Paul Melrose".

Paul Melrose
NSW/ACT Design Manager
Lendlease Communities