

TRIM reference SC549

Greener Places
Government Architect New South Wales
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23 February 2018

Dear sir/madam

Greener Places - Draft Green Infrastructure Policy – October 2017 version

Thank you for the opportunity to comment on *Greener Places – draft Green Infrastructure Policy – October 2017 version*.

In general the GreenWay Program Team welcomes the development of *Greener Places* and congratulates the staff of the Government Architect NSW (GANSW) for developing the draft policy and consulting with various agencies and interested stakeholders during the process, including the Inner West Council where the GreenWay Program is located.

It is also pleasing to note that the Cooks River to Iron Cove GreenWay is featured on the GANSW website as one of 10 Green Grid case studies being used to illustrate how the principles and approaches outlined in *Greener Places* are being implemented on the ground. The GreenWay Program Team encourages GANSW to continue to use the GreenWay as a Green Grid case study and to use what we have learnt during the GreenWay's 17 year history to refine the approaches outlined in *Greener Places* and support the successful funding and implementation of multi-purpose Green Grid corridors, including the Cooks River to Iron Cove GreenWay and the proposed GreenWay South West.

A. Introduction to the GreenWay

The GreenWay is a 5.8km sustainable transport and urban environmental corridor which extends from the Cooks River at Dulwich Hill to the Parramatta River at Iron Cove. The GreenWay vision was first developed by the Inner West community in the late 1990's and is being implemented by the Inner West Council and City of Canterbury Bankstown in collaboration with various state agencies, land owners and community groups. The GreenWay Program has 5 main elements:-

1. **active travel** - completion of the GreenWay Missing Links (shared use path)
2. **place making and place management** - with a particular focus on the 9 new Inner West Light Rail stops
3. **urban bush care** – management of 16 community bush care sites
4. **arts and culture** – identifying and celebrating the natural, historical and cultural qualities of the GreenWay corridor through art and community culture
5. **sustainability education** – using the GreenWay to teach school and university students about urban sustainability in Sydney's Inner West.

A total of \$24 mil in state and local council funding has been allocated to the complete the GreenWay Missing Links by 2021. Please see attached GreenWay Missing Links Update - October 2017 (**attach. A**) and GreenWay Program DL (**attach. B**) for further information.

The Cooks River to Iron Cove GreenWay has been identified by the Greater Sydney Commission as the no. 1 priority Green Grid project in the Draft Central Sydney District Plan (2017). It has also been identified by GANSW as one of 10 Green Grid case studies and by the Heart Foundation as a case study for designing active, healthy places. See:-

<http://www.governmentarchitect.nsw.gov.au/measuring/case-studies/2017/11/the-greenway>

<http://www.healthyactivebydesign.com.au/case-studies/greenway>

B. General comments on *Greener Places*

B1 – better spatial alignment with key state, regional and local plans

Whilst the *Greener Places* draft document mentions the importance of aligning with existing strategies and plans (eg draft district plans), we believe it should place more emphasis on the need for green infrastructure planning to closely align spatially with existing planning frameworks at appropriate scales eg city wide scale, district planning area, local government area (LGA) and neighbourhood areas. This will improve the chances of green infrastructure plans being developed and implemented at a scale which is consistent with existing statutory planning and strategy areas, thereby increasing the green infrastructure plans' chances of being successfully developed and implemented by local and state government and other urban stakeholders.

GreenWay recommendation B1 re: spatial alignment with existing key strategies and plans *Greener Places* should require green infrastructure plans to be developed by agencies at a scale which aligns spatially with existing key strategy and planning areas eg city wide scale, district planning area, local government area and neighbourhood area, thereby increasing the chances of green infrastructure plans being successfully developed and implemented by local and state government and other urban stakeholders.

B2 – benchmarking overseas green infrastructure best practise

There are good examples overseas of how green infrastructure is being successfully implemented in metropolitan urban areas similar to Sydney. It would be helpful for *Greener Places* to highlight examples of best practise green infrastructure overseas and to focus on characteristics of particular interest to NSW/Sydney. This could include successful examples of green infrastructure funding, integration of multiple functions, measurement of outcomes, benefits of green infrastructure investment etc. This could be in the form of an appendix.

GreenWay recommendation B2 re: international benchmarking *Greener Places* should benchmark overseas best practise in planning and implementing green infrastructure, with a particular focus on areas of interest/relevance to NSW/Sydney eg successful examples of green infrastructure funding, integration of multiple functions, measurement of outcomes, benefits of green infrastructure investment etc.

B3 – contribution of green infrastructure to “30 min city living”

The draft Greater Sydney Region Plan and its accompanying draft district plans place considerable emphasis on the coordination of various planning objectives to support “30 min city living” (ie) people can mostly access what they need (jobs, services, education etc) within 30 mins of where they live. Green infrastructure planning can make a significant contribution to the achievement of this over-arching objective eg by providing linked open spaces and active travel routes which connect well to existing centres. It would be helpful for

Greener Places to explicitly refer to the important role played by green infrastructure in achieving “30 min city living”.

GreenWay recommendation B3 re: “30 minute city living” *Greener Places* should more explicitly refer to the contribution which green infrastructure can make to the achievement of “30 min city living”, as outlined in the Greater Sydney Commission’s draft Greater Sydney Region Plan and its accompanying draft district plans.

B4 – incentives for green infrastructure planning and implementation

There is considerable emphasis in *Greener Places* on four important principles (integration, connectivity, multi-functionality, participation) as being the cornerstone of successful green infrastructure planning and implementation. Experience to date demonstrates that owners and operators of public and private land and assets often struggle with concepts like “integration” and “multi-functionality”, because these approaches challenge the status quo and traditional ways of planning and managing assets and minimising risk. The above approaches also often run contrary to the legislative framework for asset owners and operators. This reality has challenged our ability to secure cross-agency support over the past 17 years to fund and implement the Cooks River to Iron Cove GreenWay.

To be successful, *Greener Places* needs to offer incentives to encourage new ways of thinking amongst stakeholders in relation to the four principles which the document espouses and encourage their adoption by relevant parties. For example, the document could outline how shared access and multi-purpose use of existing green infrastructure assets (eg stormwater canals, rail corridors) can spread the burden of capital investment in green infrastructure and reduce asset management and maintenance costs for individual asset owners. The document should also refer more explicitly to the need for appropriate legislative reforms to make it easier for an individual asset owner/operator to embrace the four important principles outlined in the document and minimise real (or perceived) risk.

GreenWay recommendation B4 re: use of incentives *Greener Places* needs to offer incentives to encourage new ways of thinking amongst asset and land owners and operators to encourage their adoption of the four important green infrastructure principles of integration, connectivity, multi-functionality and participation. Where necessary, this should include appropriate legislative reforms to make it easier for individual asset owners/operators to act on the above four principles and minimise real (or perceived) risks arising.

B5 – more emphasis on cultural and spiritual connections to green places

Research demonstrates that exposure to and a connection with the natural environment (including in an urban setting) is of considerable cultural and spiritual significance to many people living in multi-cultural Australia, in particular Indigenous Australians. Although there is some reference in the document to the mental and physical health benefits of green infrastructure (eg p16), there does not seem to be any explicit reference to the deep cultural and spiritual connections which people may have to the natural environment and the important role of green infrastructure in enhancing this factor, particularly in highly developed urban areas.

GreenWay recommendation B5 re: cultural and spiritual connections – *Greener Places* should acknowledge more explicitly the deep cultural and spiritual connections which people can have to the natural environment (in particular Indigenous Australians) and the important role of green infrastructure in enhancing this connection, particularly in highly developed urban areas.

C Detailed comments on Greener Places

p18 social benefits

An important objective is to enhance community involvement in green infrastructure planning and implementation. This enhances community ownership of outcomes and can help engender a sense of community pride and shared responsibility for the on-going management and care of green places. This has been demonstrated along the Cooks River to Iron Cove GreenWay, with the progressive establishment over the last 17 years of sixteen urban bush care sites along the corridor. These are primarily established and maintained by community volunteers, under the guidance of council bush care and biodiversity officers.

GreenWay recommendation C1 – community ownership add to the list of social benefits “enhanced community ownership of outcomes and shared responsibility for on-going management and care of green places such as urban bush care sites”.

p25 – document hierarchy, p35 connectivity, p37 multi-functionality

During its 17 year history, the Cooks River to Iron Cove GreenWay project has tried to develop and implement the various principles and approaches outlined in *Greener Places* to varying degrees of success. This makes the GreenWay a good case study for *Greener Places* to use to illustrate the general thrust of the document and some of the pitfalls that have been encountered in our earlier attempts to implement green infrastructure in Sydney's Inner West. The GreenWay is currently used as a case study for the GANSW Green Grid website and the Heart Foundation's website about designing active and healthy places (see links on p2 of this submission).

GreenWay Recommendation C2 re: GreenWay case study Use the Cooks River to Iron Cove GreenWay as one of the case studies to illustrate how the principles and approaches outlined in *Greener Places* are being implemented on the ground and the lessons learned from this process. Use the GreenWay South West to trial the implementation of *Better Placed* and *Greener Places*.

P30 – principles of Green Infrastructure

The four principles articulated in *Greener Places* are sound and help the reader understand what we should fundamentally aim to achieve during the development and implementation of green infrastructure. There may be some value in contemplating a 5th overarching principle which highlights the importance of arresting ongoing damage to the ecological systems which support us (at local and regional level) and the importance of green infrastructure in restoring ecological health and enhancing our collective resilience to the long term impacts of climate change.

Consistency of language is important in policy documents like *Greener Places*, *Better Placed* and the *Greater Sydney Regional Plan* and its accompanying district plans. Ideally there would be common language used to describe the key elements of these documents. At present, *Green Places* has 4 principles, *Better Placed* has 7 objectives and the *district plans* each have 4 key themes and 10 strategic directions. It is very important that these core documents relate closely and to achieve this, it may be helpful to develop consistent language/headings for the key approaches which each document is articulating, for example by using the term objectives in all documents?

GreenWay recommendation C3 re: principles Contemplate introducing a 5th overarching principle which emphasises the importance of arresting ongoing damage to the ecological

systems which support us (at local and regional level) and the important role of green infrastructure in restoring ecological health and enhancing our collective resilience to the long term impacts of climate change.

To enhance understanding and a common approach, consider using consistent language/headings for the key approaches outlined in *Greener Places, Better Placed*, the *Greater Sydney Regional Plan* and its accompanying *district plans* eg use the term objectives rather than principles in *Greener Places*.

p 32 Integration - design actions

One of the key ways to successfully implement green infrastructure is to provide incentives and promote the benefits of shared access to and community use of publicly owned assets and land. In the case of a multi-purpose green grid corridor, the assets and land are often managed by a number of different state agencies, utilities and local councils. Our experience with the Cooks River to Iron Cove GreenWay demonstrates that the inability of public sector owners to share public access and use of their assets and land is **a major stumbling block** to the successful implementation of the design actions in *Better Places*. The document needs to explicitly mention the desirability of shared use of and access to assets and land and outline measures to help (or compel) agencies to work collaboratively to achieve this objective.

GreenWay recommendation C4 re: shared use of public assets and land – add a design action (p32) which explicitly states the importance of achieving shared access to and use of publicly owned assets and land and outline measures to help (or compel) asset and land owners to work collaboratively to achieve this.

p34 Connectivity - design actions

Open space and recreation studies demonstrate that walking is the most popular recreation activity in urban areas like Sydney's Inner West. Local streets are typically used for this purpose and provide vital connections to local open space, recreation, retail and cultural facilities. There is an urgent need to identify at the neighbourhood level certain streets which due to their connection to surrounding areas/streets and/or their width and configuration, lend themselves to becoming "green streets" to support increased walking/cycling and a reduction in car dependency in a particular locality.

GreenWay recommendation C5 – green streets add a design action (p34) which explicitly refers to the importance of establishing a network of green streets to support increased walking/cycling and reduce car dependency in a particular locality or neighbourhood. Amend design action (d) to improve the clarity of this statement.

p46 statutory mechanisms

Although this section of the document mentions some general ways in which green infrastructure can be implemented through reforms to existing strategies and policies, it would benefit from more explicit reference to the need for targets, timeframes, performance indicators and performance measures. This could include development of some form of green infrastructure SEPP or model DCP clauses.

GreenWay recommendation C6 – more explicit targets, performance measures and statutory provisions needed This section (p46) should include more explicit reference to the need for targets, timeframes, performance indicators and performance measures. This could include development of some form of green infrastructure SEPP or model DCP clauses.

p47 collaborative government action

Our experience with the Cooks River to Iron Cove GreenWay over the past 17 years demonstrates how challenging it is to secure the necessary commitment from diverse local and state agency stakeholders to abandon traditional “silo thinking” and work collaboratively to plan, implement and operate green infrastructure which may require shared access to and use of public land and assets. One reason for this resistance is that shared use can mean loss of autonomy/control for the asset or land owner, increased risk (real or perceived) and potentially increased costs. Innovative, robust governance arrangements are needed to overcome the above obstacles in order to achieve an effective, sustainable, whole of government approach to green infrastructure planning, investment and management. This will require strong leadership, incentives (particularly funding), effective legislative reform and a raft of other measures to help public asset and land owners to think and act differently and work effectively together.

Various measures need to be explored to bring about the necessary changes, for example through creation of a Green Infrastructure NSW Agency or Commission. It is highly unlikely that Greener Places can be implemented successfully using “traditional” agency structures and governance arrangements. Similarly, it is unrealistic to assume that GANSW or the Greater Sydney Commission (at current levels of resourcing) can lead/broker these fundamental changes to the way agencies and utilities relate to each other.

GreenWay recommendation C7 – new governance arrangements - *Greener Places* needs to provide more detail about recommended new governance arrangements and agency structures to effectively challenge traditional “silo thinking” amongst established government agencies and promote successful implementation of green infrastructure through a collaborative, whole of government approach. Experience shows that existing agency structures and governance arrangements are mostly inadequate for this purpose. It will require strong leadership, incentives (particularly funding), effective legislative reform and a raft of other measures to help public asset and land owners to think and act differently and work effectively together to achieve the ambitious objectives outlined in *Greener Places*.

p50 Funding

The availability of adequate funding at federal, state and local level is essential for the successful implementation of *Greener Places*. Although the document outlines a range of proposed funding approaches, a lot more detail is required. This should include an analysis of VPA's and other forms of value capture/developer contributions to fund regional green infrastructure (eg regional cycle ways, biodiversity corridors), as well as addressing the shortfall in local green infrastructure assets and facilities (which is more suited to traditional funding mechanisms such as s94 contributions). Every effort should be made to “share the burden” between various layers of government (local, state, federal) and between the public and private sector to maximise chances of success. An important consideration is the need for adequate funding for the creation **and on-going** management/maintenance of green infrastructure.

GreenWay recommendation C8 – more detail re existing and new funding models – More detail is required about how existing and new funding models can be developed to provide adequate funding for the ambitious objectives outlined in *Greener Places*. This should include an investigation of value capture mechanisms and other types of developer contributions to fund regionally significant green infrastructure, to compliment local green infrastructure which is typically funded by s94 contributions and the like.

p51 Monitoring and reporting

The successful implementation of green infrastructure depends to a significant extent on the development of a more sophisticated way of measuring performance outcomes, particularly in situations where green infrastructure is multi-functional. This should include proper assessment of the costs and benefits of public and private investment in green infrastructure, particularly in relation to community health outcomes, social benefits and transport improvements ref: GreenWay Cost Benefit Assessment – 2016 (**attach. C**). Ideally a standardised methodology would be developed which can be used by all interested stakeholders to evaluate the social, environment and economic benefits of investment in green infrastructure.

GreenWay recommendation C9 – analysis of cost and benefits of investment in green infrastructure More investigation is required into how best to measure the economic, social and environmental costs and benefits of investing in green infrastructure, particularly in relation to community health outcomes, social benefits and transport improvements. This is particularly important when trying to measure performance outcomes of multi-functional green infrastructure.

D conclusion

The *Greener Places* draft policy is a bold attempt to address the shortcomings in contemporary thinking about how best to plan and implement green infrastructure in NSW and evaluate its performance. The comments and recommendations in this submission are informed by our experience over the last 17 years of developing and implementing the Cooks River to Iron Cove Greenway, which is now being recognised as a best practise example of Sydney's Green Grid in action. It has been a frustrating and slow process for us at times and demonstrates how much current thinking and attitudes amongst public and private sector asset and land owners needs to change, in order to successfully implement the ambitious principles and actions outlined in the *Greener Places* document. Significant additional funding and effective "whole of government" action is essential for this purpose.

We would be happy to meet with GANSW, Greater Sydney Commission and other stakeholders to discuss some of the issues and recommendations raised in this submission and examine how best to use our experiences with the Cooks River to Iron Cove GreenWay to inform some of the new approaches outlined in *Greener Places*.

Yours sincerely

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attachments

- A** GreenWay Missing Links Update – October 2017
- B** GreenWay DL/brochure
- C** Greenway Cost Benefit Analysis – part 1 – SGS Economics – April 2016

