

PLEASE DO NOT PUBLISH MY NAME OR PERSONAL DETAILS

Thank you for the opportunity to make a submission on the Draft Greener Places policy.

Opening statement:

My opinion is that the draft policy is **TOTALLY INADEQUATE** for its stated purpose because it will have no “teeth”.

By that I mean the draft policy’s intentions are excellent but there needs to be adequate legislation, compliance and enforcement to back it up.

Given the recent dismantling of most of NSW environmental protection laws, which now allow almost anyone to destroy anything and everything green and public, I cannot for the life of me see how this Greener Places Policy will be achieved. It will require reinstatement of environmental protection laws which have just been repealed. Therefore the current laws and this Draft Greener Places Policy are mutually and totally incompatible.

Explanation:

The NSW Government is not taking environmental issues seriously! If the Government expended 10% of the energy used constructing Toll Roads and Light Railways, I would be (somewhat) convinced that they are thinking about it.

Instead, the NSW Government has deliberately sidelined all aspects of the environment in its recently passed Biodiversity Laws in favour of development of all sorts. There has been no real consideration of the principles of Ecologically Sustainable Development, although lip-service is paid to the concept. Indeed, the NSW Government policies and legislation are a total farce, with regard to the environment.

As is the **Draft Greener Places Policy**. It is full of good intentions and motherhood statements. But the actual reality on the ground experience out in suburbia is an environmental nightmare: Here is an example.

Below: this is a new housing estate in Leppington, SW Sydney, abutting Camden Valley Way at top left. The images were downloaded on 25-2-2018 from Google Earth. I have added yellow lines and boxes for clarity & explanation.

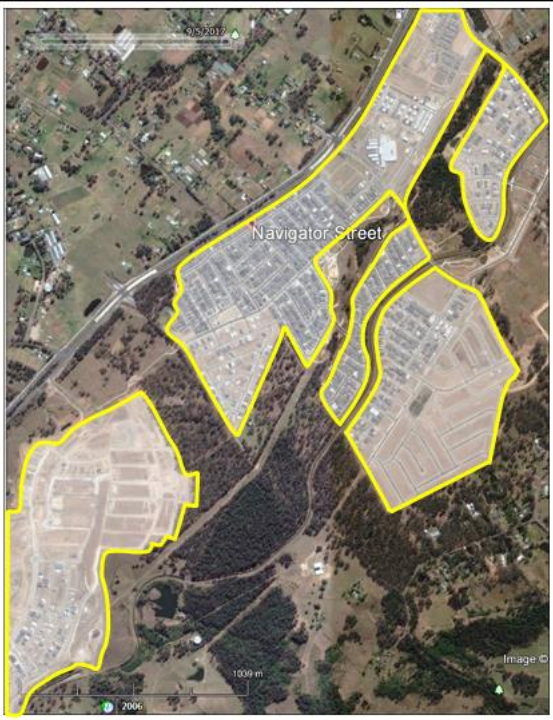
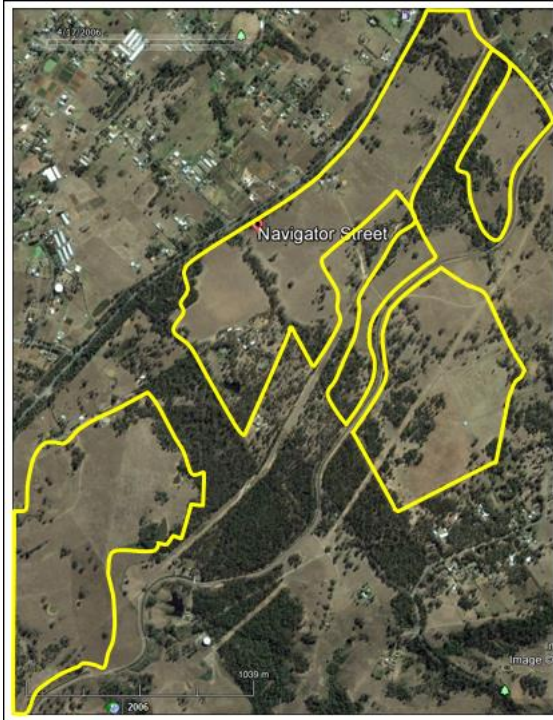


The yellow box encloses an area enlarged on the next page.

This is the area enclosed in a yellow box on the last image, enlarged. It shows clearly the detail of the “cheek-by-jowl” nature of this appalling housing estate design. This image is dated 5-5-2016, copied from Google Earth.



How is such a bad design even allowed, let alone tolerated by residents? The houses along Navigator St backing on to Camden Valley Way (at top left) are so closely packed that you could reach out and touch the neighbour’s wall; there are no back yards, or minimal ones at best. The houses are large, the blocks are small. There has been nil consideration of the principles of solar design and orientation so that the houses may be heated/cooled naturally; and they have heat-absorbing **black roofs!** The whole housing estate will use massive amounts of electricity to cool it in summer and heat it in winter; there is no space to dry washing outside, therefore electric driers must be used, yet **there are no solar panels!** Moreover, there are no shade trees to mitigate the “heat island effect” - and unlikely to be any even in 30 years’ time, as the trees will have a very hard time thriving in such an environmental wasteland. The other houses in the image fare little better, most having only slightly more back yard, but not enough to grow shady tree canopy. This is the worst badly-planned housing estate I have seen, yet when I look around Google Earth, **there are hundreds more identical!** I ask how the Draft Greener Places Policy is going to tackle such madness?



At left is a pair of images of the same area as before – suburb of Leppington; the image on the left shows bush and farmland dated 17-4-2006; on the right, massive over-development happening now, image dated 5-9-2017. There is minimal retention of natural vegetation. *[Yellow outlines & shading added by me.]*

Below is another example, at the Junction of Camden Valley Way & Cowpasture Rd (centre left), showing Market Gardens as they were in April 2006. I have added the yellow outline to delineate the current development.



Below: Image of the same area, now an unfinished housing estate. Google Earth image dated September 2017.



The loss of food producing areas around Sydney is a concern, but that does not seem to be in within the scope of the Draft Greener Places Policy. My objection illustrated in the above pair of images is that even when there are mature shade trees existing, developers clear every single one if they are able. Perhaps it is time to force developers to retain the trees and design around them so that they are given space, air and water? This land will be transformed into another hot housing estate with large air-conditioned houses, hard surfaces and minimal soil/garden space. In turn, this will increase runoff, leading to erosion elsewhere, and depleted aquifers due to lack of rainwater soaking in to the ground, replenishing the groundwater. It is utter madness to treat the environment in this way in an area already stressed by water shortages (Western Sydney normally gets only a third of the 1200mm coastal Sydney receives).

Another pair of images (below) illustrate the replacement of one type of affordable housing in a spacious green setting, with a type of housing expensive to purchase and maintain – again there are large houses, minimal shade, black rooves, all factors guaranteeing a huge heating and cooling bill, and since there doesn't seem to be any solar panels here either, the electricity will probably sourced from coal-fired power plants, adding to climate change.

Below: Google Earth image (dated 2007) showing what is now the Antegra Estate, between Cowpasture Rd and Camden Valley Way, Leppington. This is directly to the north of the market gardens in the last example. In 2007 it was a caravan park, with quite a few permanent vans, providing housing affordability. It is situated in a spacious green site with many trees.



Above: Fast forward to September 2017: most of the mature and canopy trees destroyed, minimal green space, housing even more “cheek-by-jowl” than the first example, no yards at all... etc. In this case there are some white or

lighter coloured roofs, but they are so tightly packed in that indoor air-conditioning would be a necessity for every house. Again there is no consideration whatsoever of solar design, solar orientation, no solar panels, no hope of being an Ecologically Sustainable Development, whereas the previous caravan park was much more so.

The drive for profit is destroying our environment in an utterly insane way. It should be stopped, but I have serious doubts as to whether the Draft Greener Places Policy is up to the task. Indeed, it seems to be an impossible task, given what is being allowed in the 3 examples above. And they are just a sample of what is happening in Western and SW Sydney right now.

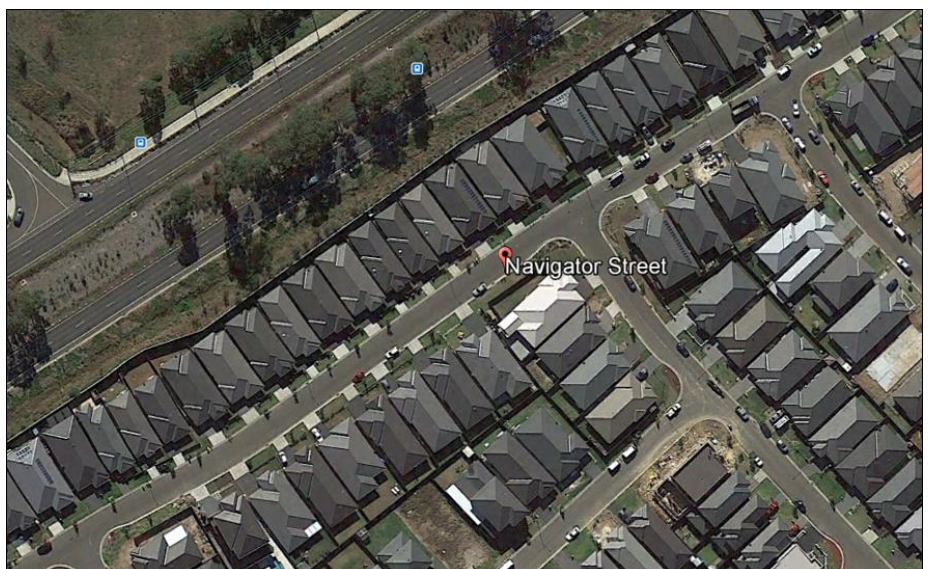
I have a great many other concerns about the Draft Greener Places Policy:

- If the Draft Greener Places Policy were a serious attempt to solve such a serious problem, it would mandate that no development must occur unless there were a commensurate increase in green space.
- In fact there needs to be a mandated quota of green space per person as the population grows. Otherwise we will lose all existing green space to greedy developers most of whom will never live in the ugly unliveable suburbs they are creating.
- A really good example from the past is the inner city Waterloo Public Housing towers built the 1960s. The towers were built widely separated and surrounded by recreation areas, lawns, trees (now mature, providing shade and canopy, habitat and food for fauna) and there is a large community vegetable garden there now. I read that City of Sydney set minimum standards of at least **6.6m² green space per resident**. When the towers are demolished and rebuilt, I doubt if there will be as much Green Space as there is now, and there will be a great loss of mature trees, as always.
- I propose that **all existing green space should be prioritised**, starting now. All mature trees should be regarded as sacred, and developments built around them to include them. These days developers just remove every living thing from a site and start anew. This should not be happening, in my humble opinion.
- Of particular importance are existing Green Places which are habitat to critically endangered, endangered, threatened and vulnerable flora and fauna. These **MUST** be protected and every effort made to reconnect them so that there are corridors where flora and fauna can thrive and continue to interbreed to maintain healthy genetics. Fragmentation of habitat is a key threatening process for most flora and fauna.
- Where there are roads that traverse such areas, money should be made available to construct flora and fauna bridges and tunnels, see example at right from Holland. This could also serve as a bicycle and walking track for people.
- I recently visited Smith's Creek Reserve in Ruse, Campbelltown (SW Sydney) where there is a healthy disease-free Koala colony. Too many of these Koalas are being killed on the roads - a Koala bridge or a tunnel or two would help. The rate of Koala deaths from road kill and dog attack is unsustainable, yet there is great habitat for them in that area.



Residents should control their dogs and drive slowly, yet many have no idea that Koalas live there. I think part of a Greener Places Policy should include programs of local education, awareness-raising, foster stewardship of the land through bush care groups, wild life carer groups. It is only when you “love” and “own” a place, rather than just using it without knowing anything about it, that you appreciate and look after it.

- Mandatory targets should be set for retaining and creating Greener Places, especially as the population grows and new suburbs are created, or existing ones re-made.
- The targets should be measureable, realistic, and adequate.
- The targets should be monitored, and evidence collected.
- GIS (Geographical Information Systems) are ideal for this, and should be easily accessible by the public. A great example to follow is the Atlas of Living Australia (<https://www.ala.org.au/>) which is a searchable GIS database of flora and fauna for the whole of Australia.
- The GIS could show the Green Space in any area, at any scale, and compare it to the population density at that place.
- The GIS can categorise Green Space in any number of ways, for example – woodland, forest, golf course, lawns, gardens, parks, playing fields; by area, by use, by ownership, by species present, by suitability for a purpose, by age, by rainfall, by historical significance, by heritage status, and so on. The possibilities are endless. But the overall amount of Green Space should be adequate for the needs of the population of that area.
- At the moment, there are a great many areas of Sydney which have a critical shortage of Green Space. Many of these shortages are in lower socio-economic zones, exacerbating existing social inequality by denying these people access to a healthy lifestyle which the presence of Green Space should afford to everyone.
- Reiterating: In any one area, there should be a mandatory amount of Green Space, which should be closely linked to an area's population density. **More people require more green space** – on a per capita basis. Otherwise the Green Space gets overused, degraded, and destroyed as the population grows. Simple.
- If Greater Sydney is to grow by one million people in the coming decade, using the old City of Sydney rule of thumb of allowing at least **6.6m² green space per inner city resident**, we need to retain or create **6.6 million m² Green Space**. This sounds a lot but it is **only 660ha or 6.6km²** – not enough in my humble opinion.
- Since this is an extremely low figure for suburban areas, I suggest it needs to be substantially more than this per capita, and quality sizable Green Space should be within 100 or 200m of every home.
- ***Of course it depends how you define Green Space, and how you measure it.*** At present, many inner city areas have nothing like 6.6m² Green Space per person. Looking at an example from before, the new housing estate at Leppington, SW Sydney, I doubt if there is as much as 6.6m² Green Space per person, which is ridiculous given that it is situated a semi-rural area, and could have included masses of recreational space, retaining mature trees and woodland. The Council DCP must be very lenient. The houses on Navigator St appear to have about 1 or 2m² Green Space per person, if you include small patches of grass at the front of the houses (see image at right). This is the result you get when Green Space is not prioritised and developers' greed wins.



- How is Green Space defined, and how is it measured? It should never include such things as nature strips, grass between house fronts, green roofs, green walls. These are highly fragmented, and devoid of fauna, generally unusable as habitat. Green Space should be large enough to support a functioning eco-system of some sort. And connected to other Green Space.
- Golf Courses are NOT Green Space in my humble opinion. They are exotic grass monocultures, artificially maintained by a great deal of water, drenched in chemicals, pesticides and fungicides. The runoff from them pollutes the waterways and kills aquatic flora and fauna. They are in fact ecological deserts that guzzle water which could be used for something productive. The Greater Sydney Commission has stated that Golf Courses should be opened up to the public for “sharing” of Green Space. This is a total cop-out – counting Golf Courses as part of the Green Space needed per capita is a neat little trick - but we will not be fooled. We need to create TRUE Green Space, not double up on the uses of Golf Courses. If Golf Courses are to be used by the public as Green Space they must be made into REAL Green Space: get rid of the grass which is a weed, or make it into a lawn; plant huge amounts of trees, construct playing fields, outdoor amphitheatres, playgrounds, gardens, shrubberies, bike tracks, walking tracks, etc. And limit the use of water, and stop the use of pesticides, fungicides and other chemicals. No one wants their kids rolling around in that toxic cocktail.
- Railway corridors likewise MUST NOT be counted as Green Space, unless they are managed in a totally different way. They are usually steeply sloping land, liable to erosion, completely festooned with exotic weeds and totally unusable by the public. Green Space must be USABLE Green Space, viable, maintained, managed.
Even if Railway corridors were planted with natives for faunal habitat and maintained at vast expense, they still cannot be accessed by the public due to (a) obvious safety reasons; and (b) the sloping nature of many railway corridors. And not to forget that noisy trains would regularly disrupt any activities attempted in such a place. So Railway Corridors should not be included as Green Space at all.
- **“Offsetting”** is one of the most egregious policies of the NSW Government. To allow a developer to trash a Green Space or vegetation in return for saving one elsewhere (probably very remote) is another neat trick that only works in favour of developers. It means that the city loses a patch of trees or Green Space forever. Once it is gone it is gone for all time. The fact that there is a similar one somewhere else as compensation really doesn’t cut it. The Draft Greener Places Policy should state that every location should have some nominated minimum of good quality Green Space within say 100m of every home. For example, if you stick a pin in a map of the urban area at random, and you draw a 100m circle to scale, there must be say, at least one large area of Green Space within that circle. “Large area” would need to be defined as well.
- As if “like for like” offsetting isn’t bad enough, the new Biodiversity legislation allows developers to PAY for offsetting, when a similar (“like for like”) vegetation patch cannot be found elsewhere. This is just a licence to clear land in return for a pittance. The Draft Greener Places Policy should insist that offsetting in all its permutations is discarded, because it is destroying our city in return for paltry payments. In short, offsetting is a Clayton’s Policy, a very low trick designed to deceive the public and allow development in areas where none should ever occur.
- Green rooftops and walls are aesthetically pleasant, but they are not real Green Space. They are private space, not public, so they are limited as to who can use them/benefit from them. They provide no real habitat, do nothing for aquifer replenishment, have no use in mitigation of floods, and in no way do they replace ground-level Green Space. They are another neat trick invented by developers to fool people into thinking that it’s OK for developers to trash existing Green Space because they are recreating it in a different form.
- The Draft Greener Places Policy should include urgent protection for Green Space on Crown Land. With the Crown Land reforms, many Green Spaces on Public Land could be sold, commercialised, or otherwise used and abused. There is a great deal of Green Space on Crown Land, and it should be prioritised for protection and management by the Local Authority, with money made available for this specific purpose.

- The Greater Sydney Commission's idea of a "Green Grid" is an exciting one. It should be pushed as a matter of high priority. If Green Spaces and connected grids of greenery are not set aside now, development will gobble them up, especially with the pressure of rapid population growth. This is particularly relevant in NW, W and SW Sydney, where there is a predominance of old farmland, market gardens, smallholdings, mosaics of woodland and vegetated streams, remnant bushland, mature stands of trees, parks, old estates, etc. These should be assessed, mapped, and prioritised as the Green Grid, and everything else designed around the Grid, including roads. The Green Grid cannot be left to develop incrementally over the next few decades, because it won't. It will get eaten up bit by bit if not protected with strong laws.
- Creating Green Spaces by relying on Developer Contributions is madness. Green Spaces and the Green Grid should be funded from public money, built first, then reimbursed (in part) by developer contributions from any development that is subsequently slotted in among the Green Grid.
- There must be an absolute prohibition on "amendments" to large scale developments which substantially alter or expand that development. These multiple modifications are another neat developer trick to maximise profit, usually at the expense of people and the environment. It must be stopped. The original plan must be stuck to, and only minor amendments allowed.

Conclusion:

There are many worthy points and statements in the Draft Greener Places Policy, but the whole document is useless unless there is strong legislation in place to protect, maintain and enhance existing Green Space **as a matter of high priority**. Just saying we should have Green Space for our happiness, exercise, health, well-being, and for the sake of nature continuing to exist **is not enough**. The Green Grid must be identified, protected in legislation and monitored, penalties for destruction enforced. Offsetting is a rotten concept and should be trashed. If the Draft Greener Places Policy has real teeth, then I support it whole-heartedly. But I cannot see how this will happen given the recent legislative changes which are all in favour of development.

I hope I have explained how I think that development as it is practiced in general in Sydney, and in Leppington in particular, is ugly, unsuitable, failing, and just plain insane. To put hundreds of huge houses on small blocks "cheek-by-jowl" with no reference to solar design or orientation is madness. To put them in a notoriously hot place like NW, W or SW Sydney is madness. In this day and age with Climate Change upon us, to build housing estates like this with black roofs, no shade, no canopy, no room for trees, no Green Space for recreation, causing the inhabitants to use heat in winter and air-conditioning in summer, using coal-fired power thus adding to Climate Change. All this is madness. One has to ask, why are we allowing it to happen?

I hope that Draft Greener Places Policy is able to address all of the above, but I have huge doubts that it will do so.

Thank you for the opportunity to comment on the Draft Greener Places Policy.