

26 February, 2018

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



**SUBMISSION IN RESPONSE TO GREENER PLACES (DRAFT) POLICY**

In 2016 Saving Sydneys Trees (SST) was established in response to the loss of public land along Alison Road and needless felling of the 'green wall' and 'Anzac Figs' at Moore Park.

Whereas Sydney's CBD/SE Light Rail project should be the city's pride and joy, the project is attracting considerable public concern as a result of bad planning decisions and governance.

Today the group's aim is to stop poor planning decisions like this from happening again and to ensure Sydney's green pace and urban canopy cover is protected and enhanced for future generations.

The introduction of a Greener Places Policy is a positive step. However the document in its present form raises a number of substantive issues. Our comments follow overleaf.

We welcome the opportunity to be part of any further consultation.

Yours sincerely,

A stylized, handwritten signature in black ink, consisting of several sharp, sweeping strokes.

Margaret Hogg  
**For Saving Sydneys Trees**

E: [savingsydneystrees@gmail.com](mailto:savingsydneystrees@gmail.com)

## **Saving Sydneys Trees Submission**

### **In response to the Greener Places (draft) Policy**

1. The introduction of a Greener Places Policy (Policy) is welcome. However the draft Policy in its current form raises a number of substantive issues.
2. The Policy 'promotes stewardship of place' and is designed to sit 'alongside the strategic design Policy Better Places' and 'inform a range of policies and approaches' however it is unclear what legal status the Policy has. This needs to be addressed.
3. As a minimum, evidence based standards and targets should be clearly defined as well as how these will be measured and monitored.

This should have formed part of the current public exhibition process so informed public comment can be made, rather than being subsequent to this process.

4. The Policy fails to respond to the critical shortage of green space and inequity that already exists in cities such as Sydney. This should be a key priority.
5. Greater Sydney to grow by another one Million people over the coming decade, with a population of 8 Million (and potentially more) by 2050.

To facilitate the growth, much of the growth is proposed to be facilitated through high density urban renewal corridors where green space effectively needs to be back-filled.

However in terms of their open space and urban canopy cover, many of these areas already experience disadvantage; e.g. Bankstown to Sydenham (B2S) urban renewal corridor.

Consequently, the Policy should include evidence based targets that are clearly defined and understood, which are released along with population and job growth targets, to ensure minimum standards are set and met.

Additional public reserve/open space should also be used to compensate areas undergoing significant increases in density, and where the loss of backyards and the like occurs.

Further the use of 'linear' green corridors along transport corridors as proposed for the B2S corridor while attractive, should be in addition to the green space provisions, rather than replace quality green space.

6. There is growing concern about the Biodiversity reforms recently introduced by the government. This is seen as a major barrier to successfully implementing the Policy given it fails to properly recognise the loss of mature canopies and green space.

For example, the offset program for the CBD/SE Light Rail project does not adequately address the nett deficit loss of mature canopy covers, which we estimate to be 81 ha.

As such there is an urgent need for a legislative review to ensure this Policy has validity.

7. The concept of green rooftops and walls is supported; however its use does not mitigate flood risk and has limited value in terms of providing sufficient ground-level green space.

There is also concern that the concept is used by developers and government agencies, such as Urban Growth, to address an acute shortfall in green space where instead the density should be adjusted (down).

Further, good quality green space on the ground will ensure better building separations are achieved.

8. The expansion of the Codes SEPP is seen as a major barrier to successfully implementing the Policy.

Likewise SEPP 65 should be amended to ensure a minimum provision of four hours of sunshine for green space survival along with sufficient building separation and setbacks to maintain deep soils.

9. Recent Crown land reform is seeing the commercialisation and potential sale of public assets. This requires urgent review in order to protect green infrastructure.
10. The Federal Government's Strategy for Nature is currently on public exhibition. This Strategy likewise fails to provide minimum standards and specific targets.

Given the interrelationship between the two documents, both documents should be reviewed to ensure minimal provisions are set and can be met.

11. The concept of 'multi-functionality' has the risk of not delivering sufficient quality green space, particularly in terms of passive recreational space and environmental conservation.

The following case studies highlight some of the challenges:

- a. The inner city will see the addition of over 100,000 extra people living in close proximity to Centennial & Moore Park Trust Parklands (e.g. Redfern - Waterloo redevelopment, Anzac Parade, Green Square).

At the same time, passive green space is reduced through the shared use of Moore Park and its surrounds. This includes plans to turn the area into an entertainment precinct. In turn this will lead to a critical shortage of green space.

- b. Draft plans for Rhodes East propose to fund a new school via development rights, with the use of the local park as a shared facility. This would see the reduction of green space.

These cases highlight issue of equity and parity. In response, minimum standards should be set with the objective of addressing the equity divide rather than rely on accessibility and shared use.

- 12. The delivery of the Green Grid 'incrementally over decades' fails to prioritise green infrastructure necessary to respond to rapid population growth.

In addition, funding models in the Policy are seen as inadequate, with a reliance on developer contributions prompting more questions than answers.

For example, the draft Master Plan for Camellia Town Centre that is currently on public exhibition relies on the developer contributions to deliver public space and green infrastructure via the Special Infrastructure Contributions Levy. This carries the risk of inflated property prices.

In response, evidence based research is needed with further public consultation prior to the finalisation of the Policy.

- 13. Large scale development projects are typically modified over time often without adjusting the green space.

For example, the Central Park project in Chippendale has undergone multiple modifications. This has seen the residential and visitor population for the site more than double without the provision of additional green space, despite there being an acute shortage of local green space. As a consequence, the area is seeing the overuse of the green space with growing social issues.

Similarly, the introduction of urban renewal corridors is likely to see the amount of open space per head of population substantially reduced, with a reliance on regional facilities rather ensuring sufficient green space at a local level.

This serves to reiterate the need for minimal green space provisions vs accessibility, in order to address the growing equity divide. Further, access barriers on major roads and transport corridors should be considered.

- 14. The concept of greenways is supported; however these should not be used as trade-off for local green space.

- 15. A Principle is 'Participation' for 'community involvement'. However, the absence of quality community consultation has seen the decline in trust in government, with consultation processes typically viewed as inadequate.

The 'Action' identified in the Policy document should be reviewed in consultation with key community and environmental groups to ensure their adequacy.

Further, in the case of major urban renewal and growth corridors, the introduction of minimum standards for green space should be identified before population and job targets are set. Otherwise the green space objectives will be compromised.

For example, the proposed redevelopment of the Waterloo Estate is likely to see green space substantially reduced with a consequent impact on the minimum standards traditionally set by the City of Sydney, i.e. 6.6 sqm per resident, with 6.0 sqm for Green Square.

In conclusion, the Policy indicates more work is needed. Further, the full set of documents should be re-exhibited for public feedback before being finalised.

### **Saving Sydneys Trees**

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