



## **GANSW DRAFT GREENER PLACES DESIGN GUIDE**

### **AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS NEW SOUTH WALES CHAPTER (AILA NSW) SUBMISSION August 2020**

#### **INTRODUCTION**

AILA congratulates the GANSW on the publication of this draft for consultation, which sees the release of a long-anticipated suite of guidelines covering three critical areas of the public realm and natural environment.

In particular, it is gratifying to see that what was previously three separate guides are now combined into one document, recognising the critical synergies between all three.

It is notable that this Guide is the first of its kind since the draft Open Space Guidelines of 2011 (never officially adopted by the NSW State Government nor universally applied in open space and recreation planning). Indeed, it is believed that there has been no similar guideline document formally adopted by the NSW State Government on this topic since 1982!

Regrettably, in the absence of current and best practice guidance for open space, tree canopy, waterways and bushland over the past two to three decades, the significant development and population growth across much of New South Wales has seen the planning, design and management of public open space based upon long outdated standards.

This omission is already demonstrated in the shortcomings of much of the open space that has been provided or embellished over those years, particularly at the critical local and neighbourhood level.

Consequently, AILA strongly supports this initiative and hopes that, following a robust critique of these draft guidelines by the many stakeholders that it affects, the finalised Guide will be swiftly adopted and widely embraced for use by the public and private sector across New South Wales.

#### **PLANNING CONTEXT OF THE GUIDE**

In submitting this response, we are aware of the important planning context in which the Guide sits and briefly summarise some critical matters below, that we believe must inform an integrated response:

- **Absence of Any National Policy Framework;** given the increasing recognition of the values of public open spaces, biodiversity, canopy, waterways and wetlands to the health of our environment and population it is deeply concerning that there is no National policy framework nor legislative instrument that we are aware of to guide States and local government in best practice delivery of an integrated approach to these critical matters



- **Differing Metrics in Each State;** as a consequence of the above each state has prepared its version of such a Guide over recent decades, all adopting varying metrics. It is therefore, heartening to see that this Guide is at the forefront of best practice and adopts a practical and innovative approach.
- **Shortage of Expertise:** the level of available expertise in this field varies greatly across the state and between local government areas. Worryingly, the field of recreation planning and design has lost an academic base over the last two decades in Australia, leaving many authorities short of expertise and experience in delivering these important strategies. Consequently, this guide must provide a critical framework to assist those responsible for these areas in meeting best practice, but also encourage and support the appointment of the necessary professionals where possible. The success of the guide will however be highly contingent on how it is promoted and supported through its implementation. In the absence of critical expertise and support, the Guide alone will not achieve its objectives.
- **Growing Demand for Land;** with growing populations and increasing densities comes a parallel demand for and cost of land. The result of this equation has been that open space and natural environments have been considered secondary to our housing and work needs, and the incremental encroachment of buildings into public open space remains a concern. With a growing body of research providing evidence of the hugely significant economic value to the nation of our public places and natural environment it is time to fund an integrated public realm and natural environment that recognises these and other values. This calls for more than embellishing existing open space and requires a bold and confident approach in investment in these critical areas of our day-to-day lives.
- **Rapidly Changing Leisure and Recreation Behaviour;** much has changed in the last three decades in the way we approach - and the time we give to - our leisure and recreation. Sadly, many of the approaches adopted by the deliverers of the public realm and organisations responsible for recreation delivery (especially in the area of sports) have remained entrenched in the expectations of single use or heavily programmed open-space, failing to recognise these trends. The recent trend for considering reallocation of golf courses to sports facilities is only one such example.
- **Health Benefits of Open Space and Natural Environments;** the Australian population's recent experience of COVID 19 has dramatically demonstrated to us all the value of public open spaces and natural environments to our individual and collective health and well-being. This dramatic event has also emphasised the critical role that nature and landscape plays in social engagement. It is to be hoped that this Guide will build on this growing recognition and glean political support for further investment in open spaces and natural systems.



- **Climate Change and Heat Island Impacts;** a systems-based approach to our open space and the natural landscape is key to addressing the profound, growing impacts on our communities from the effects of climate change. AILA has recently adopted a Carbon Positive policy that will guide our members in a best practice approach to this growing challenge. It is important that the Guide emphasise that an effective strategy to combat heat island impacts must be based on multiple and integrated environmental systems, a rigorously sustainable approach, and careful consideration of design choices such as cool materials, shade provision, and resilient planting.
- **Biodiversity Loss;** the current rapid, exponential decline in species diversity in Australia must be urgently addressed in the planning and design of all development, including buildings and infrastructure as well as open space. The Guide must provide clear direction, based on current conservation science, on the fundamental protection and enhancement of biodiversity in all open spaces.
- **Connection with Country;** the burgeoning realisation of the value that we can all gain from engaging with our Aboriginal community in recognising their long-standing cultural engagement with landscape and their ability to teach us about connection with country should be considered central to a guide of this nature. The development of a Reconciliation Action Plan (RAP) by AILA recognises this opportunity and we would be pleased to assist in facilitating greater involvement of the Aboriginal community in the planning design and management of our open spaces. The GANSW's Designing with Country initiative offers an ideal model to affect a much-needed paradigm shift in this respect.
- **Cultural Heritage;** central to the planning of any new development (building, infrastructure or landscape) is an understanding of the cultural heritage of the existing place. Without this context being rigorously researched and integrated into a project from inception, critical aspects of our natural and cultural heritage may be lost and new places rendered soulless and lacking in context. The AILA Landscape Heritage Group have undertaken extensive research into the importance of landscape cultural heritage, and would be pleased to provide further detailed guidance for inclusion in this Guide.

#### **GENERAL OVERVIEW OF THE GUIDELINES**

The submission form that accompanies the draft Guide requests that all submissions address four particular aspects of the document. In our detailed responses, we have used these topics as a framework for those responses. The following provides a summary response to these four particular questions:



### **Is it helpful and easy to understand?**

The Guide is unquestionably very helpful. It is user friendly, presented well and carefully structured. The graphics are clear and the text is generally jargon-free and easy to read. Some paragraphs seem a little lengthy (more bullet points might assist) and there is perhaps a need for more cross-referencing between the three sections if the Guide is to ensure the integrated approach that it promotes.

Many of the photographs are un-annotated and this misses an important opportunity to illustrate some of the points being made in the text.

### **Does it reflect contemporary understanding and practices on the given subject or issue?**

The Guide offers up-to-date and innovative best practice guidance across each of its topics with useful references to support its strategies. However, several areas of weakness have been identified.

The first is noted in the section on capacity of open-space relative to population. It is not clear where these metrics are sourced nor that there is evidence that these could not be readily challenged. As importantly in this regard, this section seems to revert to a standards-based approach that the guide wisely seeks to avoid. There is a real danger that this becomes a simple desktop default – much as was the 2.8 Ha per person standard for many decades - that discourages critical contextual analysis and field work that is central to delivering effective strategies. In support of this contextual analysis, cultural landscape heritage research and mapping should be developed at an overview level (e.g.: Greater Sydney or bioregional NSW) to guide creative, visionary place-based solutions by qualified professionals.

Secondly, the Guide neglects to focus on sustainability as a fundamental ethos. Although the detailed guidance is based on principles of sustainable design, it is rarely mentioned. ESD must be at the core of all design and planning decisions relating to any development in NSW, and such an important principle should be heavily reiterated in a guide pertaining to open space and the natural environment.

Furthermore, the Guide applies a somewhat reductionist approach to the different categories of open space. All outdoor space needs to work extremely hard and be adaptable, resilient and well-managed. Humans are not the only users, and the needs of wildlife, biodiversity and other natural blue and green systems must be integrated into the design of all open space. These spaces must also be designed with an awareness of the increasing frequency of extreme weather such as floods and bushfires, and the role they may play in mitigating the impacts of such events.

### **Does it have an appropriate level of information?**

The information provided is comprehensive and evidence based, however our experience of the application of such guides in local government indicates that some aspects of the guide may be overly complex.

The guide would benefit from some more diagrams and maps that illustrate the inter-relationships that the text refers to. In this regard, the earlier draft from 2017 seems to offer some useful examples, as cited in our detailed responses.



A significant omission in the guidelines is an adequate overview of applying the common principles to the particular circumstances of rural and remote locations. Our detailed responses provide some suggestions here.

**Does it require additional information to provide clarification or remove ambiguity?**

In general, the grain of information across all three sections of the Guide is very consistent, with some minor inconsistencies highlighted in our detailed responses.

The most obvious omission is any reference to how the Guide on Open Space for Recreation might be implemented. This is a critical omission if the Guide is to enjoy the success it deserves. This could be a very short 1-2 page section perhaps including a flow diagram.

The inclusion of a more significant recognition and integration of local Aboriginal knowledge and practice, rather than simply an Acknowledgement of Country, is warranted, respectful and valuable. Genuine listening, consultation and partnership should occur with the relevant Aboriginal communities throughout the planning and design process.

**IMPLEMENTATION RECOMMENDATIONS**

AILA recognises that many of the most important recommendations that will ensure the success of this Guide will come from its implementation phase. We therefore offer the following recommendations for the critical implementation phase:

1. **Promoting the Guide:** a first and critical phase in the implementation of the Guide will be in raising awareness of and fostering commitment to this document. It is strongly recommended that a comprehensive communications program be rolled out both digitally (through online seminars) and where applicable in live information and feedback sessions. The Landcom Design Guidelines Box Set roadshow provided an excellent example of such a promotional and awareness raising initiative.
2. **Statutory Teeth:** while many will willingly adopt and embrace this Guide and seek to implement it in line with its many best practice recommendations, the guide's objectives will not be achieved without some form of statutory framework. Importantly the statutory framework should not seek to pursue detail but rather should focus on critical metrics, while also recognizing that merit-based alternatives are legitimate where it can be demonstrated that they meet the Guide's objectives.
3. **Adequate Funding:** many councils have limited funds to implement initiatives such as those outlined in the Guide. Given the state governments recent allocation of significant funds to various open-space and environmental initiatives to local government, it is strongly recommended that funding and expertise also be offered to assist councils in developing appropriate strategies at minimum but ideally followed by funding for implementation of key initiatives.
4. **Maintenance Strategies:** one of the most neglected areas of implementation is that of the maintenance and management of works delivered on the ground. The absence of realistic upfront planning of the operational and funding implications for all new works generally results in a degradation of quality and condition of those works over time. Options for levying development for maintenance are very limited for Local Government, so it is



recommended that state government to consider reviewing contributions structures and options to assist Councils in funding this vital area of implementation.

5. **Expert Support:** the absence of available and relevant expertise within many local government organisations means that the intent of this guide will not be met in many cases without some level of external support. It is strongly recommended that the state government consider funding and organising relevant experts to assist councils in the critical phase of establishing the strategies addressed in the guide. The UK example of the CABI Space Enablers program demonstrated the value and cost effectiveness of such short sharp interventions. AILA would be keen to offer assistance here.

### **RECOMMENDATIONS – REFINEMENTS OVERVIEW**

This Guide must direct all developments and open or natural landscape spaces to be planned and designed based on:

- a fundamental understanding of ESD principles,
- connection to Country,
- an understanding of the cultural and natural heritage of the place,
- a commitment to protecting and improving natural ecosystems and biodiversity
- principles of flexible use and resilience
- a multidisciplinary approach
- an understanding of the projected future macro and microclimatic conditions.
- less complexity in some aspects of application (hierarchy, recreation uses etc.)
- avoidance wherever possible of numeric metrics that revert to open space to head of population standards

This Guide should also be refined to demonstrate more tangibly how it may be applied to the unique circumstances of rural and regional contexts, not just urban areas.

### **CONCLUSIONS**

AILA strongly endorses the adoption of this Guide following refinements incorporated from stakeholder submissions and is keen to assist in the promotion and implementation of this vital Guide. We believe that the progressive, well-funded implementation of the strategies addressed in the Guide will do much to protect and enhance our public spaces and natural systems, benefiting the community of New South Wales and leaving a fine legacy for future generations.

Lee Andrews  
AILA NSW President

### **Submission Team**

*This submission has been prepared by a working group of AILA NSW comprising Aparna Goyal, Udit Kapur, Annabel Murray, Helen Armstrong and Emma Washington, and led by Crosbie Lorimer. Crosbie Lorimer has some 30 years of experience in working with State and Local Governments across Australia in preparing policies, strategies and action plans for the public realm and natural systems. He also presents seminars on best practice in public realm planning and design for AILA and PIA NSW.*