



Australian Institute of  
Landscape Architects

23 February 2018

Mr Peter Poulet  
NSW Government Architect  
Government Architect NSW  
NSW Department of Planning & Environment  
320 Pitt Street  
SYDNEY NSW 2000

**RE: Draft Greener Places Policy**

Dear Mr Poulet,

**SUPPORT FOR THE POLICY**

**The Australian Institute of Landscape Architects (AILA)** is pleased to make this submission on the NSW Government's draft Greener Places policy (GANSW 2017). In addition, AILA has worked in collaboration with the Australian Institute of Architects to prepare a separate joint submission.

**AILA** is the growing national body representing over 3,000 active and engaged landscape architects, promoting the importance of the profession today and for the future. Committed to designing and creating open space for a better Australia, landscape architects shape the world around us. Landscape architects conceive, reimagine and transform the outside world from streetscapes to parks and playgrounds, transport solutions to tourism strategies, new suburbs and cities. Landscape architects represent a profession increasingly dominating the debates to lead policy making and deliver exemplary outcomes for healthy communities in liveable cities, towns and regions.

We agree with the Minister for Planning's statement that:

*"Well planned green infrastructure is fundamental to ensuring our communities retain a high quality of life and helping our cities remain sustainable, both now and into the future. Green infrastructure is essential infrastructure and should be integrated into all community planning."*

AILA also endorses the Minister's statement on the need for government, industry and the community to work together to achieve the objectives set out in the document that include:

- To protect, conserve and enhance NSW's network of green and open natural and cultural spaces
- To secure a network of high quality, high performing and well-designed green space, establishing a crucial component of urban infrastructure to address the environmental challenges of the twenty-first century
- To promote healthy living, encourage physical activity and social cohesion, and enhance wellbeing by providing liveable places for the NSW community
- To create a more strategic approach to planning for Green Infrastructure, encouraging early and



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integrated investment through statutory planning

- To deliver better tools for the delivery of Green Infrastructure across NSW.

We are confident that AILA is well placed to provide constructive comment on the draft policy that can enhance its capacity to facilitate better green infrastructure outcomes. Many AILA members are intimately involved in projects that align with these objectives. They include senior professionals in GANSW and NSW Planning and Environment who have played primary roles in preparing the draft policy. In addition, AILA members are engaged at state and local government as well as the private sector, applying their professional skills and training to the creation of green infrastructure across all jurisdictions and scales.

### KEY RECOMMENDATIONS

We have reviewed the draft policy in depth and support the underlying approach to the development of green infrastructure as envisioned in the introductory sections of the draft Policy.

AILA supports the four principles stated in the draft policy that include:

1. Integration - combine Green Infrastructure with urban development and grey infrastructure
2. Connectivity - create an interconnected network of open space
3. Multifunctionality - deliver multiple ecosystem services simultaneously
4. Participation - involve stakeholders in development and implementation

In addition, AILA strongly recommends that the document should include the following principle or directive:

Provision – by addressing the 4 principles ensure provision of adequate open space and facilities, including creation of new open space where necessary, to meet the needs of current and future communities.

In the same vein, AILA also recommends that the document should be more explicit in how the array of private and public organisations and the different professions – all responsible for a quality built environment - can contribute to Greener Places. From Councils to State government departments from engineers to planners to asset and project managers, we all have a responsibility to help achieve high quality greener places and no one department or profession can deliver this alone.

We agree that effective implementation of the principles will require:

**Statutory measures** – the final Greener Spaces policies should operate within the strategic planning framework established in the Environmental Planning and Assessment Act 1979. Its consideration should be an early and mandatory component of the strategic growth and infrastructure planning undertaken by State agencies and local councils

**Collaborative action** – a collaborative approach between government, stakeholders and communities will ensure greater understanding of the importance of Green Infrastructure, ownership of the policy and commitment to delivery of its intended outcomes



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**Funding** – existing and future funding mechanisms need to be linked and enhanced as required to ensure identified actions are delivered in a coordinated manner by the most appropriate organisation or authority.

The issue of funding would be greatly assisted if green infrastructure was recognised by NSW Government Treasury as an asset with equal standing as buildings, roads and services.; this recognition would include assigning a monetary value to all urban trees using an accredited tool so that the full cost of removing trees can be recognised to influence decision making. It would also record the increasing asset value of trees as they mature. The asset value of public parks and open space should also include community health benefits, environmental services and climate change mitigation.

#### **FURTHER CONSTRUCTIVE INPUT TO THE DRAFT DOCUMENT**

We offer the following recommendations with the intent of providing constructive input to the process of strengthening the draft policy so that it can be effectively implemented to meet the stated objectives. AILA recommends that the draft document be amended in the following ways.

1. Clearly state that the policy is a living document and its success depends on it being updated to address unfolding risks and opportunities and ongoing refinement of roles and responsibilities in the delivery of Green Infrastructure.
2. Provide an enhanced definition of green infrastructure and articulate the meaning of “high quality green space” taking account of a needs-based analysis, recognising that not all green infrastructure is ‘multifunctional’ and that some is primarily valued for passive recreation and/or ecological values
3. Acknowledge, quantify and qualify the environmental, social and economic benefits attributed to the full spectrum of green infrastructure types in terms of benefits to public health, community cohesion, environmental services, reduction in urban heat and energy consumption, stormwater quality management and flood control, cultural heritage values, biodiversity conservation and food production
4. Clearly explain how the policy is to be implemented in terms of statutory framework, governance, administration, resourcing, funding and monitoring
5. Demonstrate how to coordinate with other state agencies whose activities intersect with the planning, design, implementation and management of green infrastructure
6. Describe the measures that will be undertaken to protect, conserve and enhance the existing network of green spaces, including the Green Grid, so that the Policy objectives flow through to defined outcomes
7. Prepare accurate and detailed spatial data to clearly identify gaps in the existing network of green open space and identify the appropriate scale to apply the data sets in order to prioritise future open space acquisition and rehabilitation
8. Carry out a comprehensive assessment of existing open space to determine if it is adequate to meet the needs of existing communities as well as projected new communities



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9. Acknowledge that acquisition of new open space is required to meet the demands of a growing urban population and increased residential densities
10. Develop a metropolitan wide green infrastructure strategy based on the results of the assessment that will provide a coordinated acquisition program to replace the current ad hoc process
11. Carry out an audit of all existing funding programs as proposed by the Department, to understand their extent, purpose, triggers and timing, which also includes an assessment of the adequacy of those funding sources to successfully achieve the stated objectives of the policy
12. Continue to engage professional organisations, including AILA, PIA and AIA, in the process of planning, implementing and monitoring green infrastructure in NSW.

#### **FURTHER DEVELOPMENT OF THE POLICY AND INVESTMENT IN GREEN INFRASTRUCTURE**

The draft policy notes that the proposed statutory reforms will include:

- Inclusion of Green Infrastructure strategic planning outcomes and requirements in regional plan (including the Greater Sydney Regional Plan) and district plans with Green Infrastructure considered as essential infrastructure
- Inclusion of Green Infrastructure in Land Use and Infrastructure Plans, Priority Precincts and with funding through Special Infrastructure Contributions (SICS) where appropriate
- Issuance of manuals, toolkits, planning circulars and planning practice notes providing advice to councils and other stakeholders about the requirements for preparing open space strategies, urban bushland and waterway strategies and urban canopy cover strategies, in accordance with Green Infrastructure, and providing advice about preparation of planning proposals and LEPs to generate more effective regional and district plans
- Monitoring and reporting of Greener Spaces outcomes and projects through the Department's People and Places dashboard, using State and local government data and ongoing audits of open space, urban bushland, waterway health and urban canopy cover
- Development of model council DCP clauses regarding Greener Places requirements to assist councils in implementing the requirements of the policy and related guidelines at the local level.

AILA acknowledges that implementation of these reforms is a challenging task and would be pleased to assist as appropriate. This may include involvement in workshops and review and comment on draft reform proposals.

With regard to implementation of the Greener Places policy, AILA looks forward to being engaged in the proposed series of workshops that aim to:

- Finalise the key actions for implementation of the Greener Places policy
- Assign relevant indicators or measures for each action in order to measure and evaluate outcomes
- Assign lead agencies to instigate policy actions



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- Identify partners who will work with lead agencies to instigate collaborative change.

A key aspect of successful implementation will be adequate funding and people resources. While the draft policy identifies three existing sources for funding Green Infrastructure, which include grant programs, Council Section 94 contributions plans and Special Infrastructure Contributions (SIC), AILA considers that the level of funding currently available is not adequate to effectively implement the Greener Places policy to achieve the stated objectives. In addition, there is inadequate coordination between the various funding sources to make the most effective use of the limited funding available.

AILA strongly supports the proposal to conduct an audit of all existing funding programs to understand their extent, purpose, triggers and timing to identify potential opportunities for coordination, and gaps. However, the audit also needs to assess the adequacy of existing funding in relation to the level of funding that will be required to achieve the stated objectives of the draft policy.

While AILA supports the intention to investigate new funding streams, we strongly encourage the review to assess how much the existing funding sources should be increased. The funding sources listed include Metropolitan Greenspace Program, Environmental Trust grants program and Sydney's Walking future and Sydney's Cycling Future programs. However, the current level of funding under these programs is low compared to what is likely to be required.

We would like to thank you for the opportunity to provide a submission for the draft Greener Places policy. It is important that all stakeholders work closely together to ensure our communities retain a high quality of life well into the future.

Please do not hesitate to contact me if you would like to discuss any aspect of this submission further.

Sincerely,

Mark Tyrrell  
NSW Chapter President  
Australian Institute of Landscape Architects