



Australian
Institute of
Architects



Australian Institute of
Landscape Architects

Greener Places

Establishing an Urban Green Infrastructure for New South Wales | Draft for discussion

Joint submission to the Government Architect NSW
by the Australian Institute of Architects
and the Australian Institute of Landscape Architects

May 2018



Overview

The Australian Institute of Landscape Architects and the Australian Institute of Architects (“the Institutes”) appreciate the opportunity to comment on the NSW Government’s Draft Greener Places Policy (GANSW 2017) (“the Draft”) on behalf of the 3,000 members of AILA and more than 11,000 members of AIA, around one third of whom reside in NSW.

Many members of the Institutes are intimately involved in projects that align with the objectives of the Draft. They include senior professionals in the Government Architect of New South Wales (“GANSW”) and NSW Department of Planning and Environment who have played primary roles in preparing the draft policy. In addition, the Institutes’ 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.

The Institutes 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.”

The Institutes also endorse 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 livable places for the NSW community
- To create a more strategic approach to planning for Green Infrastructure, encouraging early and integrated investment through statutory planning
- To deliver better tools for the delivery of Green Infrastructure across NSW.

The principles of the Draft are strongly supported, however as organisations whose respective memberships comprise primarily practicing professionals, our key question relates to the proposed delivery framework. What does success look like? How do we know when we have done well? How do we know when we are not doing well?

We first provide key recommendations, and then structure our response around the structure of the Draft itself with the suggestion of an additional section at the end to incorporate adequate governance with the authority to deliver.

Key recommendations

1. **Green Infrastructure should be designated as essential infrastructure.** It is essential to the life and well-being of NSW's current and future population.
2. **The definition of Green Infrastructure should be broadened to include elements of 'blue'.** We believe this policy should recognise and incorporate the essential resource of water as part of the policy framework. Without water, green infrastructure cannot succeed.
3. **The Principles of the policy – integration, connectivity, multifunctionality and participation – should be extended to include a fifth: provision.** "Provision" here refers to 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.
4. **For this policy to be effective, it needs to be supported by certainty, predictability, and accountability, all of which we believe can be provided if accompanied by adequate governance with the authority to deliver.** In our view, this extends to include the relevant statutory controls, monitoring agencies and above all funding. The policy needs to demonstrate greater strength in terms of implementation and delivery.
5. **Funding mechanisms for the delivery and maintenance of Green Infrastructure require more detailed review.** It is insufficient simply to cost delivery, as ongoing maintenance is as important (if not more) than the up-front cost. Some councils with large responsibility for large local government areas and a low rate base will not be able to afford to implement the policy without assistance at the State level.
6. **Legibility and accessibility of the document requires review.** We understand that the purpose of the document is to be, at least in some regards, a ready-reference for various government agencies, both at the state and local government level. With this in mind we query the accessibility of the content: the document is in parts repetitive with major sections included as subsections elsewhere, and in the context of our review we found it extremely challenging to find a complete and succinct summary of the main proposals (for example, it is necessary to continuously refer to several sections in the Draft to be fully informed about each "principle", its full definition and how it will be enacted). We recommend that the structure of the policy be reviewed with respect to the likely end-user.
7. **The Draft, although intended as a statewide policy, is heavily focused on eastern/central Sydney.** This is demonstrated by the majority of the pictures selected for case studies, as per the below table. Whilst we understand that some areas of NSW are further advanced than other areas in their development of Green Infrastructure (hence the need for the policy in order to equalise the development of Green Infrastructure) the risk of this limited selection is that it fosters the perception that Green Infrastructure is only relevant to inner Sydney, Parramatta and Newcastle – and irrelevant to the vast majority of the state. We appreciate that this is not the case but believe the policy would be well advised to broaden its selection of case study imagery.

Table of referenced images in draft policy

Coastal Fringe		Inland
<i>Eastern/Central Sydney</i>	<i>Coastal Fringe outside Sydney</i>	<i>Beyond</i>
Hyde Park, Sydney Prince Alfred Park, Sydney Redfern Park One Central Park (1) One Central Park (2) Bourke Street Cycle Network Redfern Park (2) Narrabeen Lagoon K2K Competition Pirrama Park Playground, Pyrmont Prince Alfred Park Meadow, Surry Hills One Central Park (3) The Goods Line, Ultimo Sydney Park (x4) Prince Alfred Park, Sydney (2)	Civic Park, Newcastle Honeysuckle precinct, Newcastle Civic Park, Newcastle (2) Civic Park, Newcastle (3) Civic Park, Newcastle (4) Civic Park, Newcastle (5)	Parramatta Square Parramatta Park Western Sydney Parklands Western Sydney Parklands (2) Clear Paddock Creek Parramatta Park (2)

1. Introducing Greener Places

Greener Places

Greener Places explains why a Green Infrastructure policy is needed, and the vision and objectives for its implementation. Green infrastructure should be developed as a network rather than separate elements. Green Infrastructure is essential and needs to be considered as an asset in its own right.

Greener Places is a state policy which is assessed against agreed criteria, enabling better opportunities for industry to embed the benefits of a greener approach to projects. This in turn will create better places and landscapes.

1.1 What is Green Infrastructure?

What is well-designed Green Infrastructure?

Green Infrastructure connects vital life support systems for urban environments. Well-designed Green Infrastructure responds to four key principles:

- Integration*
- Connectivity*
- Multifunctionality*
- Participation.*

Comments and Recommendations

While the principles of this draft policy are strongly supported by the Institutes, it is noted that the definition of Green Infrastructure should acknowledge the importance of water as part of the provision of such infrastructure, and extend to incorporate the 'Blue' (as opposed to grey) and corresponding policy.

The Draft Greater Sydney Region Plan and Draft District Plans, launched concurrently with Greener Places in October 2017, and Cooling Western Sydney also launched in 2017, address some of the same issues. These plans and policies should have an integrated and united voice.

Recommendations

1. Expand the definition of Green Infrastructure to acknowledge the importance of water, particularly as it relates to the cooling of places.
2. Clearly state that the policy is a living document and its success depends on it being maintained and updated to incorporate other plans and policies, address unfolding risks and opportunities and refine ongoing roles and responsibilities for its delivery.
3. Clearly refer to existing policies that cover similar issues and explain how those policies and the present one will interact and engage with each other.

The Institutes support the four principles stated in the draft policy that well designed green infrastructure 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

Recommendations

1. The Institutes strongly recommend that the document should include the following principle or directive:
5. 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.
2. An enhanced definition of Green Infrastructure should be provided to 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

Green Infrastructure compliments the development of other types of infrastructure projects. Green Infrastructure projects should be collaborative, where infrastructure in general is redefined to include an essential green component. By moving beyond a siloed approach, towards connecting agencies and physical networks of open space, the people of NSW will benefit.

1.2 Why do we need Green Infrastructure?

The provision of Green Infrastructure will help improve the quality of our urban and rural environments as well as help adapt and mitigate the effects of climate change. Well-designed and planned Green Infrastructure will help absorb flood water, cool the urban environment, clean the air, provide space for local food production and ensure the survival of Sydney's fauna and flora as well as providing space for recreation, sport and leisure.

The Institutes support 'moving beyond a siloed approach' and have expressed this view over many years. To this end we also strongly support the role of the GANSW in integrating design expertise across Government.

Recommendations

Recently completed and current research should inform the review of the Draft. In addition to 'Cooling Western Sydney' as previously noted, it should also cross reference with the Greater Sydney Region Plan (as noted in the Draft) that also addresses some of these issues.

In the same vein, the Institutes also recommend that the Draft 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 to community groups, all have a responsibility to achieve high quality greener places and no one department or profession can deliver this alone.

The serious problem of heat, and lack of green, in western Sydney (and indeed western NSW) needs to be addressed in an integrated way. Sydney's west is less green and significantly hotter (and getting hotter) and dryer. The east (as per the images in the publication) is, by comparison, green.

How can a green infrastructure be delivered in the west to rebalance Sydney?

The Cooling Western Sydney strategic study 2017, by UNSW, Sydney Water and the Low Carbon Living CRC, challenges "*the conventional thinking around mitigating urban heat, including the way we look at the built environment, energy demand, public health and 'greening' cities.*"

Recommendation

Reference and draw upon the research of 'Cooling Western Sydney, which notes that *'while greenery does have a cooling effect, the study shows the most effective urban heat technologies use a combination of water-based technologies including fountains in conjunction with cool material technologies such as cool roofs and pavements'*

(Cooling Western Sydney: A strategic study on the role of water in mitigating urban heat in Western Sydney, Sydney Water Corporation 2017, p.3).

1.3 The Benefits of Green Infrastructure

Green Infrastructure is an asset to our built environment that delivers multiple social, environmental, and economic benefits. Green Infrastructure can frame and shape the growth of sustainable communities by promoting access to open space, nature, culture and sport, which will improve the appeal to visitors and the quality of life for all.

1.4 What this Draft Policy will do

Objectives of the draft policy Greener Places aims to establish and communicate a clear NSW Government position on Green Infrastructure by establishing benchmarks for the future of our built environments. The policy will expand awareness of Green Infrastructure principles and encourage discussion of the public benefits. The objectives are:

- 1. To protect, conserve and enhance NSW's network of green and open natural and cultural spaces*
- 2. 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*
- 3. To promote healthy living, encouraging physical activity, social cohesion, and enhancing wellbeing by providing livable places for the NSW community.*
- 4. To create a more strategic approach to planning for Green Infrastructure, encouraging early and integrated investment through statutory planning*
- 5. To deliver better tools for the delivery of Green Infrastructure.*

Recommendation

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, storm-water quality management and flood control, cultural heritage values, biodiversity conservation and food production.

The Institutes support the objectives of the Draft but suggest that to know the benchmark for the future it is critical to have a clear idea of the position from where you are starting. To this end the following recommendations are made to clearly document the current situation.

Recommendations

1. 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.
2. Conduct an assessment of existing Green Infrastructure to provide baseline data from which to measure the success of the Policy. 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 to prioritise future open space acquisition and rehabilitation
3. 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.
4. Acknowledge that acquisition of new open space is likely required to meet the demands of a growing urban population and increased residential densities and provide adequate resources to address this requirement

1.5 Where Greener Places fits

Recommendations

1. The diagram of the Strategic planning framework in NSW would benefit from identifying the location of accompanying policies (eg. Better Placed)
2. The recent and ongoing work of the Greater Sydney Commission through their respective plans are logical counterparts to this policy. The location of these plans should be identified within the framework diagram.

1.6 How Greener Places will help

Greener Places advocates for early integration and collaboration between design, planning, funding and governance. It fosters long-term, coordinated decision-making in planning problems and processes.

The Institutes support the early integration and collaboration between design, planning, funding and governance.

Recommendations

1. The Draft should demonstrate how to coordinate with other state agencies whose activities intersect with the planning, design, implementation and management of green infrastructure.
2. The Draft should acknowledge that acquisition of new open space is required to meet the demands of a growing urban population and increased residential densities.
3. 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

1.7 How to use Greener Places

The best kinds of policy are those that are used, not sitting on a shelf. To this extent we recommend the following.

Recommendations

1. As per comment under 'General', we believe that the policy would be better served if this section were located up front.
2. The contents of this section read less as a 'how to use' and more 'who should use it.' We believe renaming the section might also broaden its take up by the proposed cohorts.

2. Creating Greener Places

2.1 Principles of Green Infrastructure

Recommendations

1. As per 'What is Green Infrastructure', we believe that there is a fifth principle required – Provision.
2. The principles as stated are quite generic, whereas the equivalent principles in Better Placed have a sense of the imperative, and function as a call to action. Might the principles be supported by a prefix (eg. Better [...], more [...])?

2.2 Outcomes

The outcomes identified are broad, principle-based and essential to describing in general terms what the effective implementation of the policy might look like. However, we know from experience that measurable outcomes are often an equally essential aspect for policy delivery.

Recommendation

Develop and incorporate appropriate KPIs or similar to provide guidance as to the effective implementation of this policy.

3. Implementing Greener Places

3.1 Implementation

Integrating Green Infrastructure into the NSW strategic and statutory planning framework is considered essential, but this alone will not ensure delivery of outcomes. A collaborative and appropriately funded approach is needed.

We agree that effective implementation of the principles will require:

1. 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
2. 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
3. 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.

3.2 Statutory Measures

It is proposed to implement Greener Places through a package of reforms to existing strategies and policies.

Fundamental to the success of implementation is a shift in thinking so that Green Infrastructure is considered essential infrastructure making it part of up-front strategic land-use and infrastructure planning undertaken by the Department of Planning and Environment, Greater Sydney Commission, other agencies and councils.

Proposed statutory reforms include:

—Inclusion of Green Infrastructure strategic planning outcomes and requirements in regional plans (including the Greater Sydney Regional Plan) and district plans with Green Infrastructure considered as essential infrastructure

3.3 Collaborative government action

A series of workshops with government agencies, peak bodies and all relevant stakeholders will be held in order to: —Finalise the key actions for implementation of the Greener Places policy —Assign relevant outcomes for each action in order to measure and evaluate —Assign lead agencies to instigate policy actions — Identify partners who will work with lead agencies to instigate collaborative change.

There is a difference between proposals and the existence of and support for the relevant 'teeth' to deliver a policy. We believe that the policy requires the latter.

Recommendation

1. Clearly explain how the policy is to be implemented in terms of statutory framework, governance, administration, resourcing, funding and monitoring

The Institutes acknowledge that implementation of these reforms is a challenging task and would be pleased to assist as appropriate. The Institutes look forward to being involved with the proposed series of workshops.

3.5 Funding

Identification, integration and coordination of funding streams from federal, state and local government sources will be essential to deliver a Green Infrastructure network for NSW.

Existing Green Infrastructure funding sources include:

- Grant programs
- Council Section 94 contributions plans
- Special Infrastructure Contributions (SIC)

A key aspect of successful implementation will be adequate funding and human 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), the Institutes consider that the level of funding currently available is not adequate to effectively implement the Greener Places policy in accordance with 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.

Funding sufficient green infrastructure and maintaining it are critical - councils with large local government areas and a low rate base cannot afford this by themselves.

The Institutes strongly support 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.

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 and in order to influence informed 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.

Recommendations

1. 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
2. While the Institutes support 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, we understand that the current level of funding under these programs is low compared to what is likely to be required.
3. That the GANSW promote Green Infrastructure as essential infrastructure with equal standing as buildings, roads and services and approach the NSW Government Treasury as a key collaborator for the uptake of this policy.

3.6 Monitoring and Reporting

Monitoring and reporting of policy outcomes is essential. Monitoring and reporting will be achieved through mandatory reporting on implementation of regional and district plans and LEPs, and through the Department's People and Places dashboard.

3.7 Next steps

The Government Architect will consult with a range of stakeholders on this draft of Greener Places and will review the feedback before finalising the policy in early 2018.

The final policy will include a detailed plan for implementation with actions, timelines and responsibilities and evaluation and monitoring measures and will address a range of funding options with recommendations to ensure the delivery of Greener Places.

The Institutes support the proposal that monitoring be embedded in regular and mandatory reporting.

Recommendation

That GANSW continues to engage with professional organisations, including the Institutes and the Planning Institute of Australia, in the process of planning, implementing and monitoring green infrastructure in NSW.

Yours sincerely



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SUBMISSION BY

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PURPOSE

This joint submission is made by the NSW Chapter of the Australian Institute of Architects and the Australian Institute of Landscape Architects to the Government Architect New South Wales draft policy, Greener Places.

INFORMATION

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organisation with more than 11,000 members who are bound by a Code of Conduct and disciplinary procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.
- The Institute's New South Wales Chapter has more than 3,000 members

- The Australian Institute of Landscape Architects (AILA) champions quality design for public open spaces, stronger communities and greater environmental stewardship.
- AILA represents 3,000 members throughout Australia and overseas, approximately one third of whom are based in NSW
- As a not-for-profit professional association, our role is to serve the mutual interests of our members and the wider profession.

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