



AILA NSW SUBMISSION - DETAILED RESPONSES - AUGUST 2020

(See also overview of responses)

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Page or section no	Section title	Response
Introduction Page 4		<p>Explaining Green Infrastructure; The inclusion of an aerial oblique illustrative map to identify the elements of green infrastructure that comprise the building blocks of the collective elements in this Guide (much as was included in the 2017 draft at page 13), would seem helpful here.</p> <p>It would also seem important to acknowledge the varying contexts in which this Guide will be used (city, suburban, rural and regional) upfront, here and not as a closing paragraph on page 5. Furthermore, it would also be of benefit to describe how the three categories do not exist in isolation, but interact, overlap and support each other. Open space and tree canopy, for example, also support habitat and ecological health. The bullet-point categorisations are reductionist by necessity, but could be less so.</p> <p>As a footnote it is observable throughout all three guides that the specific requirements and variables of regional towns or rural areas have not been as comprehensively addressed as those for city contexts.</p>
	Who should use this guide	Generally well explained



	Where can this information be applied	Generally well explained
Pg 5	Premier's Priorities	It would seem crucial to provide reference to the principal allied strategies here eg City District Plans, Sydney Green Grid, 5 Million Trees etc ... Maybe a diagram?
Pg 7	Acknowledgement of Country	This should be given more prominence (ie standalone text over an image?) given that this document relates to land and landscape of such rich and important Aboriginal heritage. The concept of Connection to Country is gaining evermore relevance in contemporary life, so framing this guide with a brief text reference to Aboriginal cultural associations with landscape is important, valuable and respectful.
1.0	OPEN SPACE FOR RECREATION	
1.1	What is open space for recreation	<p>Definition of 'Open space'; this needs further consideration and listing of main types to assist interpretation. Many inner urban open spaces are built upon, especially adaptively repurposed and post-industrial sites, eg Paddington Reservoir, Waverton Coal Loader, institutional grounds, cemeteries, and so on In general as we move away from seeing recreation as just based in parks, the term 'Public Realm' seems more relevant. Tactically this also implies the involvement of allied professionals such as planners, urban designers and engineers.</p> <p>'Fauna conservation' should be replaced with 'habitat for wildlife'. Conservation is a very specific act that is not necessarily occurring in open spaces.</p> <p>Planning Context: explaining where the open space for recreation guide fits in the wider planning context would benefit from an illustration similar to that in the 2017 draft guide (Page 23). This Guide will have a critical relationship to other policies and documents employed by local government not least Plans of Management and open-space databases and Asset Registers.</p> <p>Private Open Space: in denser urban spaces this is increasingly being divided in to private open space (ie a garden) and communal space such as courtyard gardens (jointly use and enjoyed by private residents). While this document necessarily addresses public open space, this sub-definition matters as the crucial nature of the borrowed landscape (ie public views of green within private space) needs to be acknowledged and deliberately addressed.</p>



		<p>Consider mechanisms for assessing important public views, such as to landscape horizons characterised by vegetated ridges.</p>
1.1 Cont'd Bottom of Page 10		<p>Settings Definitions: this vital aspect of managing the public realm seems strangely unexplained. There is no title to the eight settings shown nor any reference to these in the text. The settings also need comprehensive review; several are repetitive (Squares, Plazas and Forecourts can readily be grouped as one), Reserves is a term not well understood and would be better simply as Bushland, Sportsgrounds warrant their own setting even if often combined with general parkland. It also essential to explain that many of these settings can be combined within one broader park or landscape (ie differing parks within a single riparian corridor or sportsgrounds in a bushland setting), as this has critical planning, design and management implications (especially with respect to Plans of Management).</p> <p>From experience across numerous LGAs in NSW and around Australia, most settings tend to vary in minor degrees around a core as follows (in no particular order):</p> <ul style="list-style-type: none">▪ Bushland (generally covering all natural vegetation landscapes)▪ Waterways and foreshores (creeks, rivers, lakes, wetlands, beaches etc)▪ Parklands and Gardens▪ Sportsgrounds (generally fields and or courts facilities)▪ Civic Spaces, Plazas and Squares▪ Rooftops and podia <p>Where an LGA wishes to embrace the full public realm, they may also include Streetscapes and Informal Spaces (ie car parks that may have recreational uses or places that may be temporarily available for public access). We would suggest that this section Settings requires more explanation and perhaps warrants a table in the Appendix to explain these settings and their inter-relationships.</p> <p>To avoid ambiguity we would suggest that the above be called Settings or Landscape Settings (rather than the more obscure 'Classifications' under the Local Govt Act) and that the varying urban contexts addressed later in the Guide (varying densities, suburban, regional etc) be called 'Urban Context' or similar.</p> <p>The importance of open space: while many who use this guide will be conversant with the values of open space it is worth restating these values, to reinforce that this Guide is all about an holistic view for public realm and the</p>



		<p>numerous interrelationships that it has with all other areas of the built and natural environment. A simple diagram (such as was included in the draft 2017 guide page 19), might best convey these values. It might also be worth saying something specifically about the economic value of open space citing perhaps the example of Parramatta City Council's own work in this field. Stating these values clearly and simply will assist those who are battling with competing demands for other land uses to make their case for the importance of open space.</p> <p>Reference should be made to irregular but important non-recreation functions of open space, including floodwater management and bushfire refuge.</p>
1.2	Planning for recreation opportunities	<p>Promoting a performance-based approach instead of spatial standards is strongly supported. The reference to the old standards might also identify that:</p> <ul style="list-style-type: none"> ▪ the 2.8Ha/1000 persons standard would require a limitless supply of land as population densities increase in inner urban areas. By way of example, applying this approach to the projected population of the future Waterloo Estate in Sydney would require a land area three times that of the entire estate) ▪ the %age approach to developable land makes no allowance for changing populations. <p>The access, distribution and park size metrics adopted in this Guide ensure the flexibility that an area can change in land-use and density over time and still meet changing demand</p>
1.3	Strategies for providing open space for recreation	<p>These nine strategies are strongly supported, however it is suggested, given the importance of this section, that this it warrants a short introduction:</p> <ol style="list-style-type: none"> 1. Strategy one illustrates the ambiguity with use of the word Settings (see above) 2. Capacity is highly problematic to prove. Some care is going to be required here in interpretation – see comments on page 23 3. The particular challenges of very high-density landscapes need to be emphasised (e.g. high specifications and maintenance requirements) 4. Open spaces can also be used to support nature, by increasing biodiversity, habitat provision and wildlife corridors. 5. It would seem important to mention the value of streetscapes 6. OK 7. It would be worthwhile mentioning that multipurpose spaces are not intended to be all things to all people. In addition, it is important to highlight the need to consider the impact of park use and noise on adjoining residential uses. 8. OK



		<p>9. Comment as per item 3. Life-cycle costs are mentioned here but these do not seem to get any further attention in the rest of the section despite their critical importance</p> <p>10. Sustainable design is not mentioned anywhere. It is essential to design spaces that respond to the cultural and environmental context, and are designed for low water and fertiliser use, to maximise biodiversity, and to utilise native or endemic plants that are resilient to the weather extremes of the current and projected local microclimatic conditions. Open space must be designed for longevity.</p>
1.4	Criteria and Performance indicators	<p>Criteria: these criteria are strongly supported. It might be helpful here to provide a diagram that shows how all the criteria work together particularly the interface between size accessibility distribution</p> <p>Density: it is not clear whether the density measure is net or gross. These produce very different results; presumably net would be considered the measure.</p>
	Accessibility and connectivity	<p>Accessibility and Connectivity: there is some ambiguity here in the mention of 10 minute walk and then in the table 2 to 3 minute walk.</p> <p>In the performance indicators it is worth stressing that time should be a primary factor as distance does not always relate to time (e.g. lengthy road crossing times)</p> <p>More generally, many of these access times and distances could not be practically applied in rural towns or in villages outside regional centres. Best practice strategies for these contexts typically focus on making the core of the villages or towns more walk and cycle friendly and sharing the use of open space such as school grounds and play areas. Simple strategies such as offering playspaces and shaded seating areas close to shops where residents outside of these towns may come once a week to shop may help with social interaction, recognising that many landowners on large rural properties effectively have adequate if different recreational opportunities for their children.</p>
	Distribution	<p>Distribution: while 0.15 Ha maybe applicable in High density areas In some circumstances, care will be needed to ensure this very small size does not become a default. A minimum of 0.3 Ha would seem a sensible baseline.</p> <p>The 400 metre criteria for access to open space needs to consider what form recreation can be participated in. For instance, linear corridors may not provide opportunities for small children to kick a ball about close to home. It is</p>



		<p>essential to define that walking distances are the real distance required to be walked (eg Pedsheds) not radii which produces altogether different result. Again, a simple illustration would assist here.</p> <p>The distinction between district and regional open spaces is not very clear. Also, Regional open space attractions are not necessarily size based; e.g. a small heritage garden maybe a regional attraction.</p> <p>Accessibility versus distribution: the 30-minute drive to a district open-space seems lengthy. 10 to 20 minutes would be a more appropriate criteria</p> <p>Regional metropolitan open spaces: it might be worthwhile mentioning City Districts here given a critical role in the planning and strategies for the Sydney metropolitan area.</p> <p>Parks and Day-to-day Destinations: one aspect of distribution of local open space that is getting increasing attention is the location of local open space en route to or adjoining day-to-day destinations such as shops, schools, work and transport. Evidence seems to suggest that local parks located on these routes gain higher levels of use on any given day. This also has a direct relationship to the most walkable and cycle friendly streets in any neighbourhood. Penrith city council is successful Open Space Reinvestment strategy has provided a useful benchmark for how this can be achieved in retrofitting existing suburbs.</p> <p>It would be helpful if the definitions are placed before the elaboration of different core criteria.</p>
	Size and shape	<p>Size and shape: The adequacy of size particularly for local open space should also make mention of the potential for amenity issues of adjoining residence especially in the high-density environments.</p> <p>In recent years, the minimum size of 0.3 Ha for Local open space in most medium density areas and even in higher density areas has generally proven a useful benchmark. Where 0.5 Ha can be achieved this should of course still be sought.</p> <p>As mentioned in section 1.7 Fit for Purpose the shape of land is important. Given that open space can be anything from 0.15 to many hectares in size it might be more helpful rather than using minimum widths, to use ratios for</p>



		<p>local open spaces in particular, ideally no more elongated than a 1:3 ratio, say. Or perhaps a combination of minimum sizes and ratios.</p> <p>The Performance Indicators seem to be at odds with those on the previous page. The minimum size of the local park in low density areas should be either a 5000 or 7000. A bracket cannot be considered a minimum.</p> <p>There is a mention in performance criteria that “Smaller parks need to be supported by larger open spaces”. It is not clear on the intent of this sentence; this would benefit from expansion</p>
	Quantity	<p>Quantity: It would be worthwhile stressing that quantity should be derived from a combination of Distribution, Access and Density. When these three criteria are mapped out across a locality, the shortfalls and duplications are easily identified.</p> <p>A strong case can also be made here for being bolder about acquiring new open space (in addition to, not as an offset for existing open space), recognising the option for demolition of existing buildings to provide new open-space over the longer term to meet high-density needs, particularly where these cannot be met by existing open space provision. The City of Sydney’s proposal to create a new park on the site of the Woolworths store opposite Town Hall is a case in point of strong forward planning over many decades. Penrith City Council is likewise removing an existing car park to create a CBD Park.</p> <p>Unfortunately, many recently developed precincts plans for major growth areas in established communities in Sydney have relied on embellishment of existing open-space leading to the probability of a serious under provision of open space quantum for the new community.</p> <p>The seemingly high cost of acquiring new land for open space in existing high-density environments will be far outweighed in the future by the economic and social impacts of not providing adequate open space.</p>
	Quality	<p>Quality: Strongly support this strategy, however it should again include sustainability in terms of function, material selection, water use and infiltration, reducing urban heat, shade provision, minimising fertiliser use and careful plant selection.</p> <p>It is strongly recommended the authors discuss urban heat islands, heat stress, and shade, considering recent incidents in western Sydney where playground materials reached temperatures in summer that could burn</p>



		<p>children/people who touched them: https://www.smh.com.au/education/burn-baby-burn-playground-surfaces-hit-90-degrees-in-summer-20181109-p50f41.html</p> <p>In addition, details should be given on establishing, measuring/assessing and maintaining quality. What is a high quality space?</p>
	Diversity	<p>Diversity: The varying user spaces in the performance indicators are a helpful checklist. However the detailed abbreviation of each space and supplemented by a detailed appendix will tend to suggest that each of these has to be accommodated with independent space which is, as stated not the intention.</p> <p>It would seem better that they are left as a simple checklist, with some basic matters to consider for each. The level of detail provided here contrasts strongly with the absence of detail on Landscape settings earlier in the document which are the more critical foundations of a robust open space network.</p>
1.5	Understanding Recreation types	<p>Types of outdoor recreation: comments as above.</p>
1.6	Planning for different urban setting	<p>Regional and Rural: distinction needs to be drawn between regional and rural areas. The urban areas of larger regional towns such as Mudgee or Orange have more in common with local low or medium density suburbs in city areas, while small villages and towns in rural areas or at distance from regional centres such as Newcastle and Wollongong – or indeed rural villages in Hawkesbury or Camden LGAs - have entirely different circumstances and differing needs (see comment on regional and rural contexts above).</p>
	Typical urban settings	
	Brownfield site and redevelopment areas	<p>Brownfield sites: retrofitting open space in established suburbs or environments is one of most complex areas of public realm planning. The danger of using population triggers for provision in these environments is that this simple numbers-based approach will encourage the use of the guides to revert to old standard type approaches. This approach requires less analysis of the particulars of the locality, by not doing the necessary contextual analysis and fieldwork.</p> <p>It is also incorrect to say that brownfield and redevelopment sites usually feature existing open space.</p> <p>It would be useful to format the brownfield section the same as greenfield, i.e. highlighting key considerations in planning for brownfield sites. This should include remediation, ensuring adequate soil volume for trees to reach maturity, providing for water detention in flooding events and so on.</p>



	General capacity measures	<p>General capacity measures: the issue of open space capacity by population is problematic. It is not clear what the source is of some of the metrics used, but these are likely to be highly challengeable. Attempting to overlay this with all the other criteria is going to make life more complex for those applying this guide. For instance, the metrics for open space for sports use is highly dependent on the nature of the sports being participated in.</p> <p>This can change over a period of as little as a decade, which could substantially affect provision levels (as an aside, it might be worth mentioning the importance of demand management here, as there is not an infinite amount of space available in high density urban areas to meet all sports needs, particularly given that at any one time less than one third of the population are involved in organised sporting activity).</p>
	Greenfield areas	<p>Greenfield areas: again, the application of the three criteria around accessibility, distribution and size can be used here to establish a network on the new greenfield site, in combination with criteria in 1.7 Fit for Purpose.</p>
Pg 25	Typical Hierarchy	<p>General Capacity and Typical Hierarchy of parkland provision: it is surprising to see that the matter of Hierarchy is placed so late in the guide. Clarity of hierarchy, although of no interest to the open space user, is essential for design and management purposes (also in relation to Plans Management). Experience across Australia shows that few local Councils manage hierarchy in any systematic way, yet many have multiple hierarchies in their database.</p> <p>Those that are most successful in this area tend to stick with three basic hierarchy levels, being Regional, District and Local, defining the differences between the three and with some preferring to remove the geographic reference, which can often imply a size or distance implication and make these simply Level 1, Level 2 and Level 3 (per Ipswich City Council since the late 1990s).</p>
1.7	Fit for purpose	<p>Fit for Purpose: This section is strongly supported and should go a long way to addressing the situation where Councils inherit open-space through development that is largely the leftover land after the best land has been used for built form.</p> <p>In previous versions of the guide it was suggested that local open space should be bounded on at least three sides by road. Seeing this has been abandoned in favour of a percentage of exterior length, the former performance criteria would perhaps ensure a better outcome on the ground optimising accessibility from all corners of the park, as well as visibility/views in and out, and safety.</p>



		Consideration should also be given to the non-recreation and irregular requirements of open space, such as providing bushfire refuge. it would be helpful if examples of typical 'incompatible land uses' could be given.
2.0	URBAN TREE CANOPY	This is a vital and timely part of the Guide and it is gratifying to see its inclusion along with the two other sections of the Guide in one collated document, recognising the critical interrelationships between the three. While still aspirational in many places it is an important benchmark for addressing this critical issue in urban and regional contexts, particularly in relation to climate change. The recognition that percentages of tree canopy cover must necessarily vary by context and landuse is a very practical response and places the onus on the user of the Guide to undertake contextual analysis while still seeking to optimise tree canopy cover.
2.1	What is urban tree canopy	Well described and illustrated. The brief evidence provided on the impact of trees is vital and could be expanded to include additional examples of research outcome to support this role. The focus on the health and well-being values of trees is a timely recognition of the values that have been to date understated. Reinforcing that point, research has shown that looking at trees has a greater impact on health and well-being than any other form of green infrastructure. The values of trees might also include visual quality and support of active transport through provision of shade, and should also mention the importance of varied canopy density and height, as well as shrub and groundcover systems beneath.
2.2	Improving the approach	With respect to addressing heat island mitigation it is noticeable that many councils are placing emphasis on more trees rather than fewer well selected trees, chosen for their suitability to the existing and projected microclimate and their fire resistance, planted to the correct specifications such that they generate the widest possible canopy cover without competing with other trees that are too close. The photograph on page 32 illustrates issue closely spaced trees providing thin canopy Limited shade and having a little impact on heat island even if they do offer high visual amenity
2.3	Strategies	These three strategies are well structured but could perhaps be simply headed, Protect, Connect, Inform to simplify the message
2.4	What is the optimal canopy cover level	This is a useful overview of optimal canopy cover and targets already set. It is likely that these targets will change in the near future as feedback on impact on the ground is better understood; but they reinforce that a goal in the



		region of 30-40% target should be considered a median around which targets can be adjusted to take into consideration varying contexts of urban fabric and development.
2.5	Indicative targets	<p>These are strongly supported. Given the critical nature of developing UTCs to inform decision-making at the district and local level (many developers are keen to improve targets but have no wider context in which to set their own goals) this perhaps warrants a heading on its own.</p> <p>Measuring urban tree canopy as a percentage of total land area in any given context is strongly supported to enable evaluation of progress. However, a consistent methodology, including the use of Lidar for measurement should apply to all LGAs.</p> <p>The analysis of tree canopy cover in Sydney neighbourhoods is helpful however the aerial photographs are so small as to make it difficult to see the impact of trees in each context.</p> <p>Correctly the Guide indicates that canopy targets must be centred around variations in context and land uses. It would be helpful for this to include land uses other than residential. In particular achieving targets in commercial and industrial land uses requires a more nuanced approach, given the large footprint of many such buildings.</p>
2.6	Recommendations for urban tree canopy	<p>It would seem essential to briefly address the critical role of tree planting techniques and specifications in general, if only to reinforce that simply planting more trees without the necessary care to ensure the soil environment and water supply needed to support them to full and healthy growth, will not achieve the intended goals. This must also include best-practice arboriculture, and the grouping and undergrounding of services and utilities.</p> <p>It might also be worthwhile mentioning the varying effectiveness in heat island mitigation produced by differing tree species. Liverpool City Council's demonstration project (see LCC's Public Domain Master Plan), illustrates this issue by identifying that denser and wider canopy trees have a stronger ambient temperature mitigation effect than taller open canopy tree species, which may nonetheless offer other ecological and amenity values; in essence it illustrates that a balanced approach is critical.</p>
	Protect, maintain and enhance the	Strongly supported



	existing urban canopy	
	Create an interconnected urban tree canopy across NSW	Strongly supported
	Build knowledge and awareness of urban tree canopy across State and local government and the community	Strongly supported. As above the role of the UTCs is central to achieving an holistic and synergistic approach. Community education and involvement is of utmost importance here.
	BUSHLAND AND WATERWAYS	Again it is gratifying to see that Bushland and Waterways have been included in the Guide that also addresses Urban Tree Canopy and Open Space for Recreation, given the synergies between all three. As with the Open Space section it would seem important to mention how allied documents and policies, not least in this case the Sydney Green Grid, which will be essential to achieving the intended outcomes for waterways and bushland.
3.1	What do we mean by urban habitat	The title of this section would seem to suggest that Urban Habitat has been previously mentioned. It might help to provide some written context here first
3.2	Planning for connectivity	Again it's important to mention the Sydney Green Grid here. A diagram or map illustrating the concept and principles of corridors and connections would seem perhaps more helpful here than a photograph. Waterways and their riparian corridors are highly contested territory so it would seem important to include reference to riparian corridor guidelines from NRA somewhere. Creating awareness that riparian corridors offer critical recreational and heritage value and connection to nature that need not be at odds with environmental conservation is a crucial message here. It is also important to clarify that connectivity allows for the essential movement of mobile species- between habitats, between food sources, and away from threats.
3.3	Introducing strategic urban	Strongly supported.



	biodiversity frameworks	Under the box titled 'SUBFs can be designed to identify', consider including identification of threatened or vulnerable species, including those that exist in adjacent sites within a viable distance for species range shift.
3.4	Strategies for urban bushland and waterways	Strongly supported. Item 4. Connect people to nature: should clarify that human use does not override the needs of biodiversity and habitat, and that spaces should be strategically planned to ensure human use is directed away from core habitats and establishing vegetation. A balance between human use and ecological benefit should be struck, and in bushland and waterway areas (as opposed to open space for recreation), ecology should be prioritised over human use.
3.5	Recommendations for urban bushland and waterways	Strongly supported although this section seems rather lengthy
	Protect and conserve ecological values	Ditto
	Restore disturbed ecosystems to enhance ecological values	Ditto
	Create new ecosystems	Ditto
	Connect urban habitats	Ditto
3.6	Planning considerations for improving urban habitat and connectivity	Strongly supported. Should also mention the importance of an initial assessment of development sites by a suitably qualified ecologist, to establish a baseline of current ecological value that should not be reduced, and to set guiding principles for the planning and design of the site from inception to occupation.