

Friday August 28, 2020

To Whom it May Concern,

Thank you for the invitation to input into the development of the draft Greener Places design guide. We understand that the Draft Guide provides information on how to design, plan and implement green infrastructure in urban areas throughout NSW.

The following is a summary of points made with relation to the Design Guide that has the endorsement and support of the following organisations:

- *Greener Spaces Better Places network*
- *Australian Institute of Landscape Architects*
- *Planning Institute of Australia*
- *Australian Institute of Architects*
- *Parks & Leisure NSW*
- *Turf NSW*
- *Nursery and Garden Industry NSW & ACT (NGINA)*
- *The Landscape Association*
- *The Total Environment Centre*
- *Cancer Council NSW*
- *Junglefy*

The purpose of this document is to clearly outline the key priorities and values that aforementioned organisations would like to see reflected in the Design Guides as well as form the foundation for the forthcoming Open Space Design SEPP.

While to varying degrees each organisation will make more detailed and technical submission based on their own areas of expertise and interest, we the above signed and on behalf of our members and network agree on the following points:

#### **1. Promoting the Guide.**

It is critical that this Guide is widely read, promoted and committed to. It is strongly recommended that this is achieved through the roll-out of a comprehensive communications campaign including live information and feedback sessions and includes a range of practitioners including, industry, local government, State government agencies and the greenlife industry sector.<sup>1</sup>

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<sup>1</sup> The Landcom Design Guidelines Box Set roadshow provided an excellent example of such a promotional and awareness raising initiative

**2. “Living Infrastructure” is essential infrastructure.**

The (health, economic, social and environmental) benefits of trees, open space, waterways, bushland, green roofs and walls are widely and well recognised and therefore should be afforded the status and protections within the planning system as ‘hard infrastructure’.

**3. Targets are aspirations without adequate implementation support.**

We fully support clear and ambitious canopy, open space, bushland and waterway targets, but without a coordinated and pragmatic partnership between the private sector, state and local governments these will not be achieved.

**4. By implementation support, in addition to statutory measures we mean funding.**

Many councils have limited funds with which to implement initiatives outlined in the guide. It is strongly recommended that funding be offered to assist councils to develop appropriate strategies as well as the implementation of key initiatives. The greenlife industries in particular note the importance of funding well-maintained green space in the public domain as it influences overall attitudes toward plants, trees and grasses.

**5. A consistent and well-supported approach to measurement is critical.**

The tools to map, measure and manage greener places inventories already exist, yet are inconsistently applied. The government should support the provision of a single tools to local governments to provide consistency and accurate information that can inform strategic planning and funding decisions at block, street, precinct, lga and regional levels.

**6. Green rooftops, walls and facades should be included**

Amid increased density, changing climatic conditions and in keeping with international best-practice, the Greener Places Design Guide should also include green roofs, walls, and facades, however metrics should acknowledge the comparative value of green space assets.

**7. A Guide doesn't have any 'bite' without statutory teeth.**

While many will willingly adopt and embrace this guideline, its objectives will not be achieved without a supporting statutory framework that focuses on critical metrics.

**8. Knowledge exchange and capacity building.**

Levels of expertise and skills among local governments practitioners is incredibly varied, and in many cases sorely lacking, which means good intentions may not come without additional levels of support. The UK example of the CABE Space Enablers program demonstrates the value of professional interventions and would be well supported by professional groups and associations.

**9. Achieve greater consistency throughout the planning process for urban green space outcomes.**

There are a range of inconsistencies in planning guidelines, for example between the ADG Guideline (regarding soil depth on private land), NSW Water (enforcement of riparian corridors) and height limits restricting FSR realisation (Telopea & Wentworth Point). These inconsistencies lead to tension and confusion between planners and urban designers and would be greatly remedied were this guide able to clarify priorities and in doing so resolve tensions.

**10. Ensure that the Guide recognises and safeguards the value of existing green spaces and tree assets.**

While increasing canopy is clearly a key outcome of this Guide, it is important that protecting what already exists is a key priority. If on the one hand, measures to increase tree canopy are being promoted while at the same time communities experience significant losses, public trust is eroded and positive messages about the value of green space are gravely undermined.

These key points underline the common themes that the aforementioned groups agree are of critical importance as the next iteration of the Design Guide is achieved and as work to develop the SEPP continues.

Thank you again for the opportunity to provide our input and we welcome any further discussion.

Kindly,



Jess Miller on behalf of the following organisations.



**JUNGLEFY**



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