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Reference: 025-20 SJ

The Government Architect NSW
government.architect@planning.nsw.gov.au

Friday, 28 August 2020

Dear Design Guide team,

Re: Greener Places Design Guide

Thank you for the opportunity to comment on the NSW Government Architect's Draft Greener Places Design Guide (Draft Guide).

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine members who represent approximately 1.3 million Sydneysiders. Many of our key goals identified in our [Strategic Plan](#) align with themes outlined in your Draft Guide including that:

- waterways and the foreshore are protected and healthier
- our region is comprised of sustainable, livable and 'smart' cities.

The SCCG's current work includes leading the development of the Greater Sydney Harbour Coastal Management Program (CMP) which aims to improve waterway health in Sydney Harbour and its catchments. We also support our members develop their own CMPs. Creating and sustaining green infrastructure through adopting water sensitive design principles are a key element of these CMPs.

We understand that the Draft Guide provides information on how to design, plan and implement green infrastructure in urban areas throughout NSW. It also provides strategies, performance criteria and recommendations to assist planning authorities design, develop and deliver green infrastructure. The SCCG would like to make the following comments:

Connecting bushland and waterways strongly supported but needs greater consideration of WSUD

The SCCG strongly supports the component in the Draft Guide for connecting bushland and waterways. There are important opportunities through greener design for connecting bushland and waterways to mitigate habitat and biodiversity loss in urban areas that has resulted from native vegetation clearing and to restore natural ecosystems with connections to blue and green urban corridors.

We are pleased to see important concepts distinguished in the Draft Guide such as *Connection Zones* – that support habitat and movement of wildlife; *Core Areas* – of bushland and waterways that are representative of the structure, function and composition of natural areas; and *Transition Areas* – where it is important to create a buffer for urban impacts on natural areas. We note the further distinction of urban bushland, waterways and habitat.

There are also important water quality improvements to be gained from restoring riparian vegetation and contributing to both waterway health and wider ecosystem health, including the marine environment. Water quality improvements can be realised through a catchment approach through such measures as naturalisation of channels and increasing tree canopy. These measures can improve stormwater infiltration and treatment through natural systems and reduce stormwater contaminants entering our waterways.



We note that the Draft Guide states the value of water sensitive urban design (WSUD) and its important links to greening and waterway health. However, promoting the use of WSUD seems confined to greenfield sites and ecosystem creation. Broader expansion and promotion of WSUD is needed through the guide.

Stronger links needed to mitigating climate change and other impacts in a local context

The Draft Guide refers to the benefits of urban trees reducing the urban heat island effect. However, it does not link to the climate risks of heat stress resulting from the urban heat island which would be valuable given that the document will be used to inform a Design and Place State Environmental Planning Policy (SEPP). Additionally, the studies referred to in the document regarding urban heat are from the United States but there has been a lot of research undertaken here in Australia on the impacts of urban heat, particularly in Western Sydney. It would be valuable to have the local context so that people can relate more readily, particularly once again if it is to inform a NSW SEPP.

There are also a lot of statistics from the United States experience about the economic benefits of urban trees, heat island effects and health and wellbeing which are not ideally in a local context for NSW experience. We recommend some interpretation for NSW.

Strong support for recognition of the role local councils play in protecting local biodiversity and greening local areas

We note the intent of the Draft Guide to be applied by Local Government in embedding green infrastructure in planning including Local Strategic Planning Statements, Local Environmental Plans, Development Control Plans and open space strategies.

The SCCG commends the idea of Strategic Urban Biodiversity Frameworks (SUBF) in the Draft Guide and the support offered by the Government Architect to provide further guidance for local councils. SUBFs provide an important opportunity to leverage a more holistic and whole of ecosystem approach for the urban greening initiatives of local councils. Further, the proposal in the Draft Guide to integrate outcomes of SUBFs in Local Strategic Planning Statements and Development Control Plans provides a critical link to councils' holistic planning. We also commend the comprehensive recommendations for protecting and conserving ecological values, restoring disturbed ecosystems and connecting people and habitat.

The SCCG provides a strong role in advocating for greening initiatives that are integrated with biodiversity and waterway health improvements in collaboration with its member councils, industry partners, community stakeholders and State Government. It is recommended that the NSW Government Architect supports the SCCG in this role by further engaging with SCCG in the implementation of the final Greener Places Design Guide.

Recommendations

1. WSUD design components included more broadly in habitat restoration initiatives for both existing and greenfields sites to enhance existing and created ecosystem function.
2. Stronger links of climate change risks to heat stress and urban heat island effects.
3. Collaboration with SCCG member councils in implementing the Greener Places Design Guide to achieve integrated biodiversity and waterway health outcomes.

We look forward to progress on the Draft Guide and further opportunities to be involved. If you have any queries, please contact me at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Joyce, Executive Officer



GANSW DRAFT GREENER PLACES DESIGN GUIDE SUBMISSION FORM

Submissions Form

PAGE	DRAFT GREENER PLACES DESIGN GUIDE SECTION	SPECIFIC COMMENT OR SUGGESTION
	Who should use this guide	Local councils, industry partners, community stakeholders and State Government.
	Where can this information be applied	Coastal Management Programs (CMPs) have a key role in improving waterway health in the catchments. Creating and sustaining green infrastructure through adopting water sensitive urban design principles are a key element of these CMPs.
1.0	OPEN SPACE FOR RECREATION	
1.1	What is open space for recreation	
1.2	Planning for recreation opportunities	
1.3	Strategies for providing open space for recreation	
1.4	Criteria and Performance indicators	
	Accessibility and connectivity	
	Distribution	
	Size and shape	
	Quality	
	Diversity	
1.5	Understanding Recreation types	
1.6	Planning for different urban setting	
	Typical urban settings	
	Brownfield site and redevelopment areas	
	General capacity measures	
	Greenfield areas	
1.7	Fit for purpose	
2.0	URBAN TREE CANOPY	
2.1	What is urban tree canopy	
2.2	Improving the approach	
2.3	Strategies	
2.4	What is the optimal canopy cover level	
2.5	Indicative targets	
2.6	Recommendations for urban tree canopy	
	Protect, maintain and enhance the existing urban canopy	



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	Create an interconnected urban tree canopy across NSW	
	Build knowledge and awareness of urban tree canopy across State and local government and the community	
	BUSHLAND AND WATERWAYS	
3.1	What do we mean by urban habitat	Supportive of concepts distinguished in the Draft Guide such as – <ul style="list-style-type: none"> - Connection Zones – that support habitat and movement of wildlife; - Core Areas – of bushland and waterways that are representative of the structure, function and composition of natural areas; and - Transition Areas – where it is important to create a buffer for urban impacts on natural areas.
3.2	Planning for connectivity	Important opportunities in connecting bushland and waterways include: <ul style="list-style-type: none"> - to mitigate habitat and biodiversity loss in urban areas that has resulted from native vegetation clearing; and - to restore natural ecosystems with connections to blue and green urban corridors.
3.3	Introducing strategic urban biodiversity frameworks	The SCCG supports the idea of Strategic Urban Biodiversity Frameworks (SUBF) in the Draft Guide and the support offered by the Government Architect to provide more guidance for local councils.
3.4	Strategies for urban bushland and waterways	See below.
3.5	Recommendations for urban bushland and waterways	Although WSUD is noted as a critical link to greening and waterway health, it seems confined to greenfield sites and ecosystem creation. The SCCG strongly advocates for including WSUD design components more broadly in habitat restoration initiatives for both existing and greenfields sites to enhance existing and created ecosystem function.
	Protect and conserve ecological values	Supportive
	Restore disturbed ecosystems to enhance ecological values	Supportive
	Create new ecosystems	Supportive
	Connect urban habitats	Supportive



Sutherland Shire
COUNCIL

INNER WEST COUNCIL



WAVERLEY
COUNCIL



Bayside Council



northern
beaches
council



WILLOUGHBY
CITY COUNCIL



Randwick City Council
a sense of community



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3.6	Planning considerations for improving urban habitat and connectivity	The SUBFs provide an important opportunity to leverage a more holistic and whole of ecosystem approach for the urban greening initiatives of local councils, particularly due to the proposed integration of SUBFs outcomes in Local Strategic Planning Statements.
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