

# Public Exhibition for the Explanation of Intended Effect New State Environmental Planning Policy (Design and Place)

<b>Your Name</b>	<b>Jacqui McLeod</b>
<b>Your Organisation</b>	<b>Sydney Coastal Councils Group (SCCG)</b> SCCG currently represents nine estuarine and coastal councils in Sydney which collaborate to advance sustainable management of Sydney's urban coastal and estuarine environment. Our goals include: <ol style="list-style-type: none"> <li>1. People and places adapt to a changing climate and future shocks and stressors.</li> <li>2. Waterways and the foreshore being protected and healthier.</li> <li>3. Marine biodiversity is protected in the bioregion.</li> <li>4. The SCCG Region is comprised of sustainable, liveable and 'smart' cities.</li> <li>5. There is a collaborative, effective and consistent approach to coastal and estuarine management.</li> </ol>
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<b>Stakeholder group</b>	<input checked="" type="checkbox"/> Industry <input type="checkbox"/> Council <input type="checkbox"/> Aboriginal Community <input type="checkbox"/> Community <input type="checkbox"/> State Agency
<b>Age demographic</b>	<input type="checkbox"/> 18-25 <input type="checkbox"/> 26-45 <input type="checkbox"/> 46-65 <input type="checkbox"/> 65+

## Your feedback

### How to make a formal submission

We welcome your feedback on the Explanation of Intended Effect for a New Design and Place State Environmental Planning Policy. **Submissions close on 31 March 2021.**

Feedback is sought on all parts of the document. Please consider if the proposal:

- Reflects contemporary understanding and practices
- Clearly articulates the intentions of the policy
- Should consider other opportunities.

## Explanation of intended effect (EIE)

### PART 1 Introduction

The SCCG welcomes the opportunity to comment on the Design and Place SEPP EIE. Our submission conveys general comments on behalf of member councils and also captures key comments from some of our councils' own submissions.

Generally the SCCG supports the SEPP intent, with specific reference to environmental, social, cultural and economic outcomes relating to waterway and marine health, a focus of interest for our member councils. The SCCG supports the intent to have one comprehensive SEPP for design that describes its process and desired outcomes and contribution to place.

On related initiatives, the SCCG has followed the development of the draft NSW Coastal Design Guidelines, providing input to the scope and more recently, a submission on the draft guidelines (pre-exhibition). The SCCG also provided a submission on the Draft Greener Places Design Guide. Key points from these SCCG submissions are included here and copies of our submissions are attached. Furthermore, the SCCG has reviewed the Parramatta River Catchment Group (PRCG) submission which is highly supported and has incorporated key points in this submission.

#### GAPS

Development of the Design and Place SEPP should include a review of the draft NSW Coastal Design Guidelines to ensure consistency and effective consideration of coastal related design issues.

We note the Design and Place SEPP will give effect to a number of objects of the Environmental Planning and Assessment Act 1979 and will also promote the NSW Premier's Priorities for a Better Environment: Greener Public Spaces and Greening our City.

The SCCG welcomes the connection with Country, creating opportunities to integrate Aboriginal perspectives in built environment projects. Applying the Connecting with Country Framework relating design and planning processes to natural systems is fundamental to sustainability and is commended.

The principles based approach is supported and covers the key areas requiring consideration for design. However, the principles appear general and open to interpretation and it is not clear how the application of the principles could be assessed or measured.

Principle 4 Design sustainable and greener places is a key reflection of the goal of sustainable, liveable and 'smart' cities for the SCCG region. In particular, water use efficiency and the integration of green infrastructure to support the health of communities and natural systems including habitat for biodiversity are fundamental to the SCCG goal to improve waterway health and protect the foreshore. Ensuring sustainable and greener places also ultimately contributes to a healthier marine environment.

**PART 2**  
**Proposed new State Environmental Planning Policy (Design and Place)**

Principle 5 Design resilient and diverse places supports the SCCG goal for people and places to adapt to a changing climate. The intended effect of the Design and Place SEPP to establish resilience as a foundation for place-based design to drive more integrated site outcomes by introducing new considerations that support resilience is important.

The approach of categorising scales of development, being precinct development, significant development and all other development is appropriate to scales necessary for environmental protection, ranging from local scales requiring habitat protection to regional scales and considerations of ecosystem biodiversity and connectivity. However, there may be exceptions for some smaller, highly urbanised and established areas which would be categorised as 'other development' and not subject to 11 of the 19 mandatory matters.

GAPS

Further consideration should be given to how the application of the principles is measured and assessed.

The SCCG strongly advocates for broader site-specific risks to be considered in design for resilience in coastal areas, beyond coastal erosion that result from sea level rise and encompass the risks of coastal inundation and storm damage.

The draft NSW Coastal Design Guidelines should be reviewed to ensure consistency of design principles for the development type as they relate to the nine coastal systems identified that may influence coastal places and their catchments. Strategies for achieving design objectives for each of the nine coastal systems should also be reviewed to ensure the Design and Place SEPP aligns.

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The place based design approach is fully supported, considering the environment beyond the immediate site or precinct and its unique qualities including environmental attributes and a link once again, to the needs of local conditions and natural systems. However, potentially this could lead to contradictions for individual councils' local planning policies and place-based design at local scales (see Recommendations).

**PART 3**  
**Key components of the new State Environmental Planning Policy**

Proposed mandatory considerations that are applicable to waterway and marine health are commended including:

3. Connectivity - for green infrastructure.
6. Water management - contributing to water security and natural methods for stormwater control and runoff.
7. Green infrastructure – contributing to a green grid by establishing an interconnected network of open space, waterways and biodiversity.
18. Tree canopy – as for Green infrastructure and Connectivity.

Consideration of resilience to climate change in design is also commended under the following principles:

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- 8. Resilience – related to coastal erosion and flooding.
- 17. Emissions and resource efficiency – considerations for reducing emissions and efficient use of water and energy are necessary to ensure reduced risks from climate change.

#### Guidance

Sustainability reforms and resilience initiatives proposed under revised and new guidance are fully supported, as they directly relate to the SCCG goals:

- Draft Connecting with Country – designing with natural systems.
- Revised Apartment Design Guide – strengthening sustainability guidance to minimize energy consumption and work towards Net Zero 2030.
- New Urban Design Guide – precinct planning and larger scale development; supporting more liveable and sustainable communities. Some of our councils noted the Urban Design Guide was not sufficiently scoped for comment and that they wished to comment on a draft document.
- Sustainability in Residential Buildings – expanding BASIX to cover green infrastructure and volume of stormwater runoff at a lot scale.
- Draft Greener Places Design Guide – broaden consideration of WSUD for development upgrades in brownfield sites, not just for greenfield sites.
- Proposed Resilience Toolkit – identification of risks and measures to address resilience should fully cover all climate change related risks including sea level rise, coastal inundation, coastal erosion and storm damage.
- Proposed strategic guide to planning for natural hazards – should include coastal hazards relating to climate change including sea level rise, coastal inundation, coastal erosion and storm damage.

#### GAPS

It is not clear why some of the mandatory considerations do not apply to all other development. For example, mandatory considerations for water management, green infrastructure and resilience should apply to small scale development. Also, additional development scales may be necessary to bridge the gap between precinct/significant development and other development for small scale development that is highly urbanised and high density to ensure the breadth of appropriate mandatory considerations.

#### **Connectivity:**

Further definition should be given to what constitutes links between green infrastructure and landscape corridors and recreational use areas.

#### **Green infrastructure:**

Replacement ratios for significant trees should be considered as well as new plantings. Revegetation should also stipulate that it must support biodiversity and provide for habitat corridors.

#### **Water management:**

The SCCG strongly advocates the strategies developed by the PRCG for creating greener urban environments and protecting waterway health that can be employed at on-lot and precinct scales, developed under the *Strategic and Statutory Planning Review to create Our Living River – Final Recommendations Paper*.

Gaps in environmental impacts assessed under BASIX could be addressed through the PRCG's potential new framework to support healthy waterways and green infrastructure implementation, termed a "blue green index", also identified in the aforementioned planning review. This framework would drive better Water Sensitive Urban Design (WSUD) outcomes and should be embodied in design considerations.

WSUD should be referenced under water management. There are numerous design options that are natural methods for stormwater control and run-off already developed and recognised as part of WSUD initiatives, representing a substantial body of knowledge. These design options can be quantified such as pervious area, to maximise stormwater infiltration.

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It is also suggested that greater incentives for applicants are required to address the significant costs of water recycling and re-use in established areas.

**Resilience:**

As discussed under Part 2, considerations of site-specific risks related to sea level rise from climate change should be expanded to include risks of coastal inundation and storm damage as well as coastal erosion and should inform the proposed Resilience Toolkit and Strategic guide to planning for natural hazards.

Design life of marine structures should be included in considerations for resilience to climate change and future sea level rise scenarios. Climate resilient materials should also be included with reference to IPWEA Practice Note 12.1: Climate Change Impacts on the Useful Life of Infrastructure and draft Note 12.2: Climate Resilient Materials for Infrastructure Design.

The NSW Coastal Design Guidelines should be included as related guidance and the Design and Places SEPP should be aligned with the specific coastal design elements.

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**PART 4**  
**Proposed amendments to existing State Environmental Planning Policies**

BASIX SEPP – support inclusion of BASIX sustainability targets in the Design and Place SEPP.

GAPS

BASIX should include developing large canopy trees and shrubs for cooling and wildlife and dense shrubs and understorey species to provide habitat. Also, the applicability of NABERS in a planning context needs to be reviewed, being a rating tool for built form.

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**PART 5**  
**Relationship with other planning instruments and policies**

The SCCG strongly supports the interfacing of the Design and Place SEPP with other key legislation.

LEPs – strongly support amending the Standard Instrument to reflect the need to demonstrate that any variation to development standards will result in an improved planning outcome and public good.

SEPP (Sydney Region Growth Centres) – support updating vegetation and cultural heritage considerations to align with the Design and Place SEPP.

GAPS

Some councils have expressed concerns about setting targets under BASIX that may limit sustainability outcomes. It will be important to explore mechanisms to allow councils some flexibility which is proposed through the development of the Design and Place SEPP.

It is recommended that the Coastal SEPP be referenced for design considerations as they relate to the four coastal management areas, being coastal wetlands and littoral rainforests, coastal vulnerability, coastal environment and coastal use areas. Maps of these areas are adopted under the Coastal SEPP and provide important context for natural systems in design considerations.

The Greater Sydney Commission Greater Sydney Region Plan, *A metropolis of 3 Cities* should be referenced, particularly in relation to improving liveability and the creation and renewal of great places, neighbourhoods and centres proposed. The Plan promotes place-based planning and design excellence that builds on local characteristics.

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**PART 6**  
**Planning pathways**

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**APPENDIX A**  
**Proposed Amendments to the Apartment Design Guide and SEPP 65**

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## APPENDIX B Proposed New Public Spaces and Urban Design Guide

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## APPENDIX C Sustainability in Residential Buildings

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### Additional comments

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#### Attachments:

- A. SCCG submission on the draft NSW Coastal Design Guidelines (pre-exhibition)
- B. SCCG submission on the draft Greener Places Design Guide

#### RECOMMENDATIONS

1. Sustainability measures for local green infrastructure are proposed to be developed to support more flexible assessment pathways outside of BASIX. Our councils would be most appreciative of further consultation to assist in developing more specific guidance material under the Design and Place SEPP.
2. There is no alignment of the principle and merit-based approach of the proposed Design and Place SEPP more broadly with the NSW statutory planning system and other SEPPs which is a concern to some of our councils. A detailed assessment should be undertaken of the implications and associated changes that may be required.
3. The Design and Place SEPP could potentially over-ride some Local Environmental Plan (LEP) provisions which is a serious concern to some of our councils. Further consultation should be undertaken to address potential constraints of a one-size-fits-all approach that may inhibit considerations and alignment with local character. This should include exploring provisions for implementing controls that exceed those of the Design and Place SEPP where there is a place-based justification.
4. For example, Councils should not be prevented from using appropriate density controls commensurate with the established and desired future local character. Increases in density (beyond what has been adopted in LEPs) result in significant changes to local character and this should not occur without widespread consultation with the local community. These provisions are contrary to local character guidelines developed by DPIE. Car parking is another example where local provisions are of necessity tailored to local conditions such as proximity to public transport.
5. There is general concern that the wider community is not aware of the practical implications of the centralised planning policy that will underpin the Design and Place SEPP. It is suggested that consultation be undertaken on a range of case studies that demonstrate the key proposed changes under current and proposed provisions and the implications for LEPs and Development Control Plans.
6. Transitional provisions to assist councils to address any additional provisions under the Design and Place SEPP when assessing development applications and/or rezonings are needed especially where substantial planning proposals are already underway. It is requested that transitional provisions include exemptions for such planning proposals. Detailed investigation needs to be undertaken about how to determine criteria for the exemptions, either at critical points in the planning process and/or for specific planning proposals already underway.
7. Concerns have been raised by several councils about the additional administrative burden potentially created by some of the proposals under the Design and Place SEPP including for planning proposals already underway, approval pathways to demonstrate consistency with precinct considerations and resourcing design reviews and sustainability assessments. Consultation should be undertaken with councils in developing the Design and Place SEPP to explore these issues to ensure they are reasonably addressed.
8. More detailed consideration of future climate warming is required at the precinct scale. Councils would be pleased to assist with development of a Resilience Toolkit for this purpose.

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**Thank you for your time in preparing this submission.**

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Reference: 004-22 SJ

19 February 2020

Danijela Karac  
Director Environment Policy  
Department of Planning, Industry and Environment  
[coastal@planning.nsw.gov.au](mailto:coastal@planning.nsw.gov.au)

### **Re: Review of the NSW Coastal Design Guidelines**

Dear Danijela,

Thank you for the invitation for the Sydney Coastal Councils Group (SCCG) to comment on the draft NSW Coastal Design Guidelines, prior to proposed public exhibition.

We greatly appreciate your Department being committed to ongoing consultation with our member Councils on these important guidelines. The SCCG previously provided advice on 31 January 2020 on the scope of the guidelines and recently heard from DPIE staff via a webinar on the 15 February 2021 where key aspects of the draft guidelines were outlined and opportunities provided to attendees to ask questions.

The SCCG has collated comments from the webinar as well as written responses received from member councils following. These are presented below and respond to the questions posed in DPIE's factsheet for internal consultation.

#### **Is the approach in the draft guidelines logical and easy to follow?**

The structure of the guidelines into separate parts is useful for a planning proposal, for ease of use by the applicant and general public. Chapter 2 "Understanding and characterising a place" will greatly assist in setting the context for applicants seeking a proposal within the coastal area.

The way the Guidelines have been drafted is relatively easy to follow given the complexity in the process for planning proposals. The format of the guidelines in a sequential manner is supported. Identifying the nine systems that may influence coastal places and their catchments helps applicants and planning practitioners determine, at an early stage, the important characteristics of the coastal environment. This helps practitioners understand what that will need to be addressed as part of the planning process followed by the application of design principles for the development type concluded with implementation via practitioner assessment.

The case studies provided are supported as they clearly highlight how the guidelines should be applied and how results should be evaluated. Designing with Country, place-based and a design-led approach is strongly supported.



Improvements are suggested with regards to terminology used. It should be recognised that commonality of language is critical and that a definitions list upfront would be beneficial and that relevant terms align with the NSW Coastal Management Framework where possible. It is suggested that a broader term be used for the coastal community's 'catchment' which covers environmental, social and economic values, drivers and consideration so as not to be confused with the more familiar and common place spatial definition of 'catchment' as it relates to a water catchment.

### **Are the draft guidelines accessible to those without a background in urban design?**

The draft Guidelines contain a range of provisions which are relevant to strategic planning and urban design on the coast. The differentiation of each of the different coastal systems is easy to follow for the lay person, while also being tailored and detailed enough to assist in plan making and decision making. Providing case studies which provide evidence as to how the provisions of the guidelines should be implemented for proponents, is essential for the public to be able to comprehend the document.

The format of Chapter 3 with each of the objectives being identified and supported by suggested strategies to meet the objectives is strongly supported. This works well in assisting both proponents and decision makers on how to achieve the objectives of each of the coastal systems.

It is suggested that for the document to be clearer for the public and planning practitioners, that the headings for the case studies are amended to identify which examples relate to the proponents and which relate to the planning practitioners. Past experience has shown that during customer service enquiries with the public, individuals will often read the example case studies in isolation. Amending the headings to clearly stipulate which case studies apply to proponents and planning practitioners could provide some further clarity in the document.

### **Are there any urban design considerations which have not been adequately addressed?**

Connectivity is central to making an area pedestrian oriented. Streets and pedestrian walkways must be enjoyable to walk, must link key destinations, and must operate at a fine scale. The guidelines should emphasise that areas must be designed to support walking and support animated and vibrant place-making. The document should make reference to the Greater Sydney Commission's Green Grid Strategy that all Councils are directed to prepare. This strategy creates links between areas of interest with a key element being public access to waterways and foreshore.

The strategy to "maximise the relationship between settlements and their natural environments" is supported. Encouraging walking and cycling in coastal communities needs to be a key part of this strategy.

The resilience of design to adapt to changing coastal processes should also refer to the design life of marine structures so that it can be linked to future sea level rise scenarios.

Under section 3.7 Built Form, we request that the document refer to the [IPWEA Practice Note 12.1: Climate Change Impacts on the Useful Life of Infrastructure](#) and Decision Tree developed. Additionally, there will be an addendum scheduled to be published this year that extends the Decision Tree Worksheet and provides climate resilient materials - IPWEA Practice Note 12.2: Climate Resilient Materials for Infrastructure Design (name currently in draft). Ideally, section 3.7 should reference IPWEA Practice Note 12.2 for which a draft should be available during the public exhibition period.

## **Are the draft guidelines aligned with other NSW Government urban design guidance and practice?**

The planning proposal process requires a full assessment against the suite of NSW Policies, Legislation and Guidelines. From an initial review, there does not appear to be any obvious conflicts between the guidelines and other urban design guidance.

It is suggested that prior to a formal submission and gazettal, that the Department of Planning, Industry and Environment conduct a detailed review into the urban design framework to ensure consistency with the guidelines.

The SCCG notes the importance of clear definitions that are relevant to planning proposals to minimise contestability of interpretation of the guidelines.

### **Other comments**

The SCCG believes that there should be a greater linkage between these guidelines and the Coastal Management Framework. It is suggested that the NSW Coastal Management Act, Coastal Management SEPP and subsequent Coastal Management Programs should identify where development is appropriate, what the lifespan those developments are and how these respond to climate projections for the area.

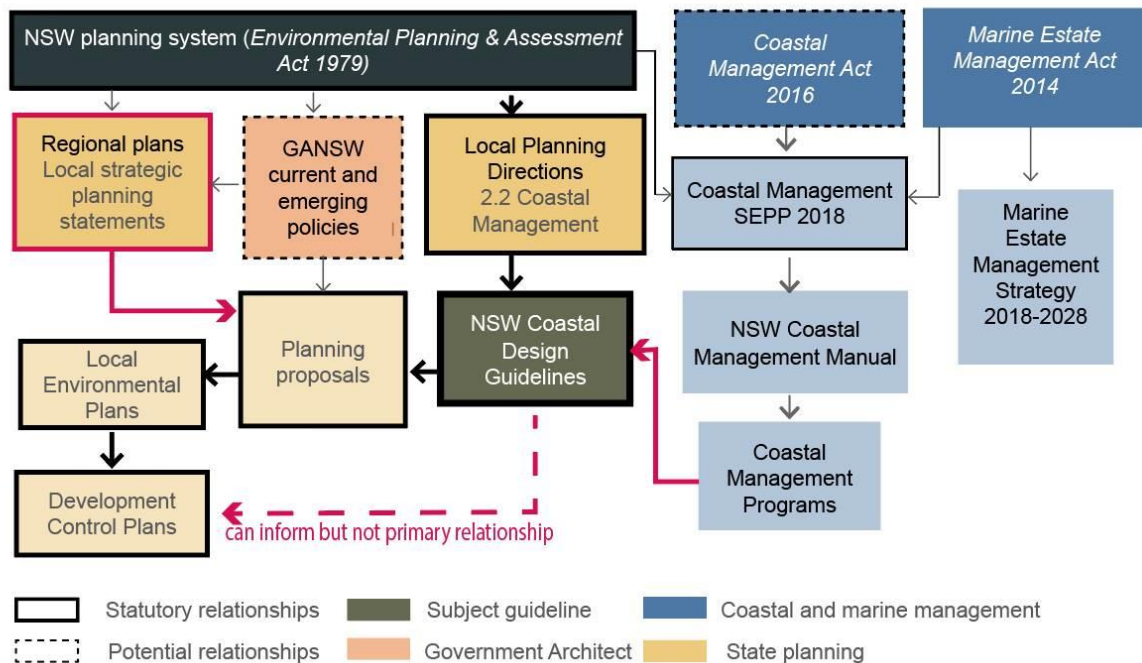
It is recommended that these guidelines identify how best to locate and design development within those already identified areas, to minimise adverse impacts to the surrounding area. Currently, the draft guidelines do not identify where new development should be located.

The SCCG recommends that Figure 2 of the draft guidelines be updated to reflect the relationship more accurately between these documents. Specifically:

- that the 'NSW Coastal Design Guidelines' would sit in the same location, however in addition, the 'Coastal Management Programs' box should link to the 'NSW Coastal Design Guidelines' box instead of the 'Development Control Plan' box. Once a Planning Proposal is prepared that considers both the Coastal Management Program and Coastal Design Guidelines, updates would then be made to both the LEP and DCP. It is crucial however that a Planning Proposal is not based on the NSW Coastal Design Guidelines only, but that the decision to increase any density or development within the coastal zone is influenced by an adopted CMP.
- the box for Regional Plans and Local Strategic Planning Statements should be shown as a statutory relationship, not a potential relationship as it is currently. We are required by the EP&A Act to give effect to the Region Plans and LSPS in the LEP, so it is a statutory relationship.
- that the line between the Regional Plans box and Local Environmental Plan box be removed, and just show the 'Region Plan' box connecting to the 'Planning Proposals' box.

A suggested updated version with the changes shown in red is provided below.





I trust that the information provided above will be helpful in finalising the draft NSW Coastal Design Guidelines prior to exhibition for public consultation.

If you have any queries, please contact me on M.0407733075 or by email at [executiveofficer@syneycoastalcouncils.com.au](mailto:executiveofficer@syneycoastalcouncils.com.au)

Yours sincerely,

*Sarah Penny Joyce*

Sarah Penny Joyce  
Executive Officer

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The Government Architect NSW  
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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](mailto: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	



## GANSW DRAFT GREENER PLACES DESIGN GUIDE SUBMISSION FORM

	Create an interconnected urban tree canopy across NSW	
	Build knowledge and awareness of urban tree canopy across State and local government and the community	
	<b>BUSHLAND AND WATERWAYS</b>	
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"> <li>- Connection Zones – that support habitat and movement of wildlife;</li> <li>- Core Areas – of bushland and waterways that are representative of the structure, function and composition of natural areas; and</li> <li>- Transition Areas – where it is important to create a buffer for urban impacts on natural areas.</li> </ul>
3.2	Planning for connectivity	Important opportunities in connecting bushland and waterways include: <ul style="list-style-type: none"> <li>- to mitigate habitat and biodiversity loss in urban areas that has resulted from native vegetation clearing; and</li> <li>- to restore natural ecosystems with connections to blue and green urban corridors.</li> </ul>
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



# GANSW DRAFT GREENER PLACES DESIGN GUIDE SUBMISSION FORM

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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