

Norma Shankie-Williams
Chair HPEWG
c/o Willoughby City Council
PO Box 57
Chatswood NSW 2057

30 March 2017

Ms Lucy Turnbull AO
Chief Commissioner
Greater Sydney Commission
PO Box 257
Parramatta NSW 2124

Dear Ms Turnbull,

EXHIBITION of *Towards our Greater Sydney 2056* and draft District Plans for Metropolitan Sydney

Submission by the Healthy Planning Expert Working Group

Thank you for the opportunity to provide feedback on the draft amendment to update *A Plan for Growing Sydney - Towards our Greater Sydney 2056* and the suite of draft District Plans which set out the aspirations, priorities and actions for each of the six Districts that make up Greater Sydney.

You are to be congratulated for your vision of '2056' and the comprehensive breadth of issues covered in the draft District Plans. They provide an excellent basis for planning the future of Sydney in coming decades. Clearly a key priority for the GSC will be to ensure the final District Plans contribute to the health and wellbeing of the people of Greater Sydney and to assist in the delivery of this outcome, I attach a submission on behalf of the Healthy Planning Expert Working Group.

The Healthy Planning Expert Working Group (HPEWG) is an independent group comprising healthy planning experts from across NSW in the academic, planning, health, local and state government sectors. A key issue raised in our submission is that the draft District Plans, although noble in their aspirations with regards to healthy planning considerations, currently lack the support of appropriate and specific delivery actions and implementation mechanisms to ensure these aspirations translate to better health outcomes across all Districts. This is a serious concern which we submit should be addressed in their finalisation.

We would be pleased to provide further advice as the Greater Sydney Commission finalises the District Plans and develops the critical associated implementation plans.

As a Group we are excited to be involved in developing and promoting all the opportunities District Planning offers to improve the health and wellbeing of Sydneysiders.

Kind regards,



Norma Shankie-Williams
Chair, Healthy Planning Expert Working Group

Submission to Greater Sydney Commission's *Towards our Greater Sydney 2056* Prepared by the Healthy Planning Expert Working Group March 2017

The Healthy Planning Expert Working Group (the HPEWG) welcomes the opportunity to comment on the draft, and significant, amendment to *A Plan for Growing Sydney*. We are aware that one of the roles of the Greater Sydney Commission is to review *A Plan for Growing Sydney* by the end of 2017. As well as offering specific responses to the draft *Towards our Greater Sydney 2056*, the HPEWG also offers general comments relating to the overall review of *A Plan for Growing Sydney*.

In general terms, the HPEWG supports the polycentric, 'three cities' concept and the broad vision, together with the advantages cited. We recommend that any amendment to *A Plan for Growing Sydney* should maintain the current emphasis, priorities and actions relating to 'healthy planning', including the development and delivery of guidelines for a healthy built environment (Action 3.3.1) and the ongoing role of the Healthy Planning Expert Working Group in their development and implementation. This recommendation is supported by the inclusion of this action in the State Government's Premier's Priority Childhood Obesity Delivery Plan, which commits creating supportive environments for healthy eating and active living to reduce childhood obesity¹. In addition, the Greater Sydney Commission's draft District Plans also refer to these guidelines for a healthy built environment.

In our view, the draft amendment *Towards our Greater Sydney 2056* narrowly emphasises productivity, economic growth and housing. We argue there needs to be an equal focus and value on health, liveability and sustainability in the review of *A Plan for Growing Sydney*.

We acknowledge that a number of health-related actions are listed throughout (e.g. walking, cycling, and the 30 minute city), however we recommend that the significance of facilitating environments that create opportunities for active living, healthy eating and the building of social relationships and cohesion warrant more explicit mention (as advantages of the new conceptualization). For example, the vision priorities (Page 6) for liveable cities should include 'healthy communities'. We also note that 'health facilities/ hubs', which are essential but focus on treating illness, are given priority over the far greater potential of the whole built environment to create healthy individuals and healthy communities.

We support the focus on integrated land use and transport planning, and hope this will be achieved in practice through the governance of the Greater Sydney Commission. We also support well designed and appropriately located urban renewal, and recommend that 'density done well' be more clearly defined (pg. 4). As part of the criteria for investigating urban renewal sites, we recommend that access to a diversity of sufficient green and open space to support the anticipated population is emphasised as an essential consideration. To create a walkable city, urban renewal needs to create a diversity of destinations, with mixed land use, not just focus on increasing housing supply².

The proposed 'aerotropolis' as the third city will require development of fertile agricultural land and diminish the capacity of Sydney to provide locally grown food for its expanding population. From a health and liveability perspective, the vision of an 'aerotropolis' raises questions about how to create a healthy city with an airport at its hub? For example, it is vital that car dependence, with its associated health and

¹ Premier's Priority Childhood Obesity Delivery Plan, 2016. NSW Health. Available at: <http://www.health.nsw.gov.au/health/Publications/Premiers-priority-childhood-obesity-delivery-plan.pdf>

² Udell T, Daley M, Johnson B, Tolley R. Does Density Matter? The role of density in creating walkable neighbourhoods. Melbourne: National Heart Foundation of Australia, 2014 Available at www.heartfoundation.org.au/density

environmental impacts, is not entrenched from the outset. This means that rail access from day one, combined with excellent walking and cycling links, will be essential.

We also specifically support the following elements of *Towards our Greater Sydney 2056*:

- A hierarchy of centres – at district and especially the local level this promotes access to quality food (by retail hierarchy) and fine-grain pedestrian/ active transport planning.
- Urban renewal corridors, with reference to the health-related implications of medium/ high density location, siting and design.
- Greening our streets, neighbourhoods and suburbs with new tree canopies.
- Increasing access to open space, conserving the natural environment and enabling healthy lifestyles and local food
- Shared facilities (e.g. school premises, hospitals) as contributing to general community use health programs.
- The explicit emphasis on equity.
- The importance given to environmental sustainability, in terms of both reducing Sydney's carbon emissions and environmental footprint and ensuring the Sydney is prepared for the inevitable problems that climate change will bring. We recommend that Sydney should adopt a target of carbon neutrality by 2040.

Submission to Greater Sydney Commission's draft District Plans

Prepared by the Healthy Planning Expert Working Group March 2017

1. Introduction

The Healthy Planning Expert Working Group (HPEWG) is an independent NSW expert group, comprising healthy planning experts from the academic, planning, health, local and state government sectors. The group originally formed in 2012 in response to the comprehensive review of the NSW planning system undertaken by the State government at that time, to advocate for the consideration of health outcomes in planning legislation and policy. The group successfully advocated for the inclusion of a health objective in the draft NSW Planning Bill (2013) and, following that, the inclusion of Action 3.3.1 in *A Plan for Growing Sydney*: “to develop guidelines for planning, designing and developing a healthy built environment”. The group sees its role as one of advocacy and provision of expert advice and continues to engage with the Greater Sydney Commission (GSC) and the Department of Planning and Environment around healthy planning matters in planning policy and legislation. See **Attachment A** for Membership and Terms of Reference for the Group.

The HPEWG's vision is that built environments should be planned, designed, developed and managed to promote and protect health for all people.

In July 2016, in response to a request from the Greater Sydney Commission Social Commissioner, the Healthy Planning Expert Working Group submitted six ‘healthy planning priorities’ to the GSC to be considered in the preparation of the draft District Plans (DPs). These were:

1. Make green space readily available in our districts
2. Ensure higher residential density is well designed and liveable
3. Create diverse and widespread opportunities for recreational physical activity
4. Make walking, wheeling and cycling the obvious and easy option
5. Facilitate connected, safe and inclusive communities
6. Provide equitable access to fresh, healthy food

The submission also included a range of recommended implementation mechanisms for these priorities. See Attachment B for a copy of this submission.

The HPEWG commends the Greater Sydney Commission on the draft District Plans and notes and supports the various ways in which these healthy planning considerations have been incorporated within the plans, to deliver better health outcomes across all Districts, including:

- The inclusion of the Liveability Framework which aspires to “place our physical and mental health and wellbeing at the forefront as Greater Sydney transitions from suburban to more urban places”.
- The inclusion of the Liveability Priority to “Create Great Places” which prioritises design-led planning, planning for safe and healthy places, and enhancing walking and cycling connections.
- The inclusion of an Affordable Rental Housing Target as a form of inclusionary zoning.
- Acknowledgment of the link between public health, physical activity and the provision of recreation and community facilities with the Liveability Priority to “Create opportunities for more recreation and community facilities” accompanied by the action to “Develop a District sport and recreation participation strategy and sport and recreation facility plan”.
- Inclusion of the Sustainability Priority to deliver Sydney's Green Grid.

The HPEWG notes that the draft District Plans, whilst at times noble in their aspirations with regards to healthy planning considerations, lack the support of appropriate and specific delivery actions and implementation mechanisms to ensure these aspirations translate to better health outcomes across all Districts.

The HPEWG puts forward the following key recommendations for consideration in the final plans, to strengthen the healthy planning priorities and ensure their translation on the ground to healthier communities across all Districts.

2. Summary of Key Recommendations

General

1. Include health (promoting and supporting healthy communities) as a key outcome upfront and throughout all sections of the plans – A Productive City, A Liveable City and A Sustainable City (planning for a productive, liveable and sustainable city must have health as a key outcome).
2. Include more specific delivery actions and implementation mechanisms (based on the nine principles of the Liveability Framework) to ensure healthy planning aspirations translate to better health outcomes across all Districts.
3. Expand the focus on engaging with the health system to include consultation and collaboration with both government and non-government health agencies, and include population and preventative health as well as clinical services. For example, include an appropriate healthy planning agency as a partner for the Liveability Action “Develop guidelines for safe and healthy built environments”.

Implementation and Monitoring

4. Expand the dashboard indicators to include a broader range of preventive health and health outcomes data, by district and LGA. Consult the Healthy Planning Expert Working Group members to develop appropriate indicators for monitoring the development of healthy built environments across each District.

A Liveable City

5. Increase the prominence of the Liveability Framework by moving it to the front section of the District Plans so that it underpins all priorities and actions in the plans across the three sections.
6. Integrate the Liveability Framework and its nine liveability outcomes for “healthy liveable places” more strongly into the Plans. For example: Clearly cross link relevant Plan priorities and actions (across all three sections) with achievement of the nine liveability outcomes covered by the Framework.
7. Ensure that the priorities and implementation actions in the “Liveable City” chapter support the delivery of all nine principles of the Liveability Framework.
8. The Liveability Action to “develop guidelines for safe and healthy built environments” should be amended to “implement” the Guidelines within each District (recognising that their development is already an action within *A Plan for Growing Sydney*). Ensure that the Guidelines sit within the Liveability Framework and compliment *Better Placed*, the draft Urban Design and Architecture policy.
9. Include a broader range of examples of how safe and healthy places will be facilitated by a range of planning system mechanisms. Some examples include the use of design guidelines in practice, the integration of healthy built environment and active travel objectives in the Local Environment Plan

(LEP) template, use of Health Impact Assessment (HIA) in certain circumstances, and including conditions of consent that require healthy design outcomes.

10. Ensure increases in density are matched with appropriate increases in social infrastructure, employment options, a diversity of high quality open and green space, and high frequency public transport, and walking and cycling connections.
11. Action Shelter NSW's recommendations in regards to social and affordable housing priorities and actions³.
12. Detail more specific actions (including mode share hierarchy and targets) for increasing walking, cycling and their links with public transport use. Align District Plan actions with the planned update to the Long Term Transport Masterplan.

A Sustainable City

13. Increase the capacity of the Green Grid to create a more equitable city by developing funding criteria that prioritises projects in areas of highest need, based on Green Grid strategic objectives. (For example, using SEIFA and health indices, chronic disease hotspots, areas most vulnerable to urban heat island risk).
14. Include an action to develop guidance for local councils on how they can promote and facilitate access to healthy food through the planning system.

³ Shelter NSW Submission to the Greater Sydney Commission March 2017. Located at https://shelternsw.org.au/sites/shelternsw.org.au/files/public/documents/170301greatersydney-subVfinal2_shelternsw.pdf

3. Detailed Rationale for Recommendations

GENERAL

1. Include health (promoting and supporting healthy communities) as a key outcome upfront and throughout all sections of the plans – A Productive City, A Liveable City and a Sustainable City (planning for a productive, liveable and sustainable city must have health as a key outcome).

We note that health is not acknowledged as a key outcome in the draft District Plans. The role of supportive built environments for healthy and active living is well established⁴⁵, and should be promoted and enabled by the planning system. Whilst there is no doubt that many of the provisions in the draft District Plans support healthy living, the Group recommends that health and wellbeing outcomes should be made more explicit in the Plans, both in the introduction and throughout. We cannot have a productive, liveable and sustainable city without a health community.

The Social Panel Advisory Paper and Environmental Panel Advisory Paper include a broad range of health objectives and outcomes that should be included in the District Plans. For example:

Social Panel Advisory Paper:

- The emphasis on social equity and the recommendations regarding housing; transport; healthy living and urban design; education, training and employment; arts, culture and entertainment; and inclusiveness and diversity.

Environment Panel Advisory Paper:

- The many recommendations concerning the wide range of matters, all of which are highly significant for human health and welfare
- In particular we emphasise the need for all District Plans to include specific strategies for reaching zero carbon emissions as soon as possible and by 2040 at the latest, and for building infrastructure and community resilience to the inevitable stresses that existing climate change will bring.

2. Include more specific delivery actions and implementation mechanisms (based on the nine principles of the Liveability Framework) to ensure healthy planning aspirations translate to better health outcomes across all Districts.

Whilst the draft District Plans set out some good aspirations around health and wellbeing, we recommend that the final plans need to be more directive and clearly articulate delivery and implementation mechanisms, processes and indicators to ensure better health outcomes are achieved across all Districts.

⁴ NSW Health (2009). *Healthy Urban Development Checklist*. Located at: <http://www.health.nsw.gov.au/urbanhealth/Publications/healthy-urban-dev-check.pdf>

⁵ UNSW Healthy Built Environments Program (2011). *Healthy Built Environments: A Review of the Literature*. Located at <https://cityfutures.be.unsw.edu.au/research/city-wellbeing/city-wellbeing-resources/literature-review/>

3. Expand the focus on engaging with the health system to include consultation and collaboration with both government and non-government health agencies, and include population and preventative health as well as clinical services. For example, include an appropriate healthy planning agency as a partner for the Liveability Action “Develop guidelines for safe and healthy built environments”.

We commend the Greater Sydney Commission for aspiring to collaborate across sectors, government agencies and levels of government to deliver on the actions of the draft District Plans. We note however that collaboration with population and preventative health sectors of the health system is missing in the draft District Plans. The potential of good urban planning and design to prevent illness and premature death and promote health offers a far greater capacity to influence population health positively, beyond hospitals and clinic facilities. This can occur via a range of mechanisms such as encouraging more physical activity, improving access to affordable healthy food, and creating more opportunities for social interaction. We therefore recommend that collaboration be extended to the population and preventative health sector and include both government and non-government agencies.

An example of where the GSC could better collaborate with the preventative health sector is around the Liveability Action “Develop guidelines for safe and healthy built environments”, where NSW Health or a non-government health agency with expertise in healthy planning should be named as a partner for this action.

Another example where the benefit of collaboration with public health agencies would be beneficial is around the Liveability Priority to ‘facilitate enhanced walking and cycling’. Transport for NSW is the named partner agency, with some connection to RMS and councils. However, the provision of infrastructure does not necessarily translate to use of that infrastructure. Better engagement with non-government health agencies, like the Heart Foundation or Bicycle NSW for example, would provide this missing link. This could then be measured - for example an increase in the use of new bicycle infrastructure of XX percent every XX years – and could be included in the dashboard indicators.

IMPLEMENTATION AND MONITORING

4. Expand the dashboard indicators to include a broader range of preventive health and health outcomes data, by district and LGA. Consult the Healthy Planning Expert Working Group members to develop appropriate indicators for monitoring the development of healthy built environments across each District.

Dashboard indicator development is a crucial mechanism for monitoring the impact and outcomes of the work of the District Plans, and may also be used to inform future strategies and actions that allow the GSC to adapt to local context. For example, where diabetes has not been reduced, what actions can the GSC take to improve these statistics (e.g. work with the local health districts to develop integrated plans that facilitate more exercise, healthier eating, and access to preventative services)? Generally, from a population health perspective we feel that the indicators should be more consistent and include more data and measures related to activities that are known to prevent ill health and promote wellbeing such as access to healthy food and time spent being physically active. Health outcome data may be useful here.

We support the intention to develop the interactive Dashboard and would be happy to work with the Greater Sydney Commission to expand the range of appropriate indicators for monitoring the development of healthy built environments across each District.

A LIVEABLE CITY

5. Increase the prominence of the Liveability Framework by moving it to the front section of the District Plans so that it underpins all priorities and actions in the plans across the three sections.

We strongly endorse the Liveability Framework as a ‘foundation for planning and infrastructure delivery to be driven by consideration of people’s needs at all stages of life’ as well as ‘placing our physical and mental health and wellbeing at the forefront as Greater Sydney transitions from suburban to more urban places’.

Although the Framework currently appears in the “Liveable City” section of the Plans, it is apparent that the nine outcomes have related actions across the three domains of *a Productive City, a Liveable City and a Sustainable City*. We recommend the Framework should be moved to the introduction section in the Plans to reflect its stated intent as a foundation for planning decisions and infrastructure delivery to promote and support healthy communities.

6. Integrate the Liveability Framework and its nine liveability outcomes for “healthy liveable places” more strongly into the Plans. For example: Clearly cross link relevant Plan priorities and actions (across all three sections) with achievement of the nine liveability outcomes covered by the Framework.

The Liveability Framework, with its nine liveability outcomes for “healthy, liveable places” should underpin all District Plan priorities and actions. It is currently unclear which District Plan priorities and actions specifically relate to the achievement of one, or indeed a number of, the liveability outcomes. We recommend clearly cross linking relevant Plan priorities and actions with achievement of the nine liveability outcomes covered by the Framework. This could be done, for example, by developing a series of nine icons, one corresponding to each outcome, and using these to illustrate how the Plans’ priorities and actions relate to the achievement of each liveability outcome. Appropriate indicators will also need to be developed for each of the nine outcomes, and included in the dashboard metrics.

7. Ensure that the priorities and implementation actions in the “Liveable City” chapter support the delivery of all nine principles of the Liveability Framework.

Whilst the Liveability Framework outlined in the draft District Plans conceives ‘liveability’ to encompass nine key outcomes for ‘healthy liveable places’ (E.g. West Central p 76) - one of which is housing choice – this section in the draft titled ‘A Liveable City’ outlines six broad liveability priorities (West Central; p 84) – three of which are focused on housing, i.e.

- Improve housing choice
- Improve housing diversity and affordability
- Coordinate and monitor housing outcomes and demographic change.

Whilst housing is an important component of liveability, there seems to be a greater focus on housing actions compared to other aspects of liveability, identified by the Liveability Framework as being equally important. We do not seek to reduce the breadth of actions related to housing, but rather to recommend an expansion of the range of actions that encompass the other liveability domains and desired outcomes.

Additionally, the ‘Liveability Actions’ do not sufficiently articulate the delivery of the nine principles in the Liveability Framework. Instead, they seem oriented to abstract goals around housing delivery such as ‘Prepare local housing strategies’, ‘Increase housing capacity’ and ‘Support councils to achieve additional

affordable housing'. There is no articulation of what is required to achieve these actions in the action framework, for example funding sources, indicators of success and timeframes. We recommend more comprehensive articulation of priorities and implementation actions in the liveability actions to ensure that all nine principles of the Liveability Framework are delivered.

8. The Liveability Action to “develop guidelines for safe and healthy built environments” should be amended to “implement” the Guidelines within each District (recognising that their development is already an action within *A Plan for Growing Sydney*). Ensure that the Guidelines sit within the Liveability Framework and compliment *Better Placed*, the draft Urban Design and Architecture policy.

A Plan for Growing Sydney (Action 3.3.1) tasks the NSW Government to “work with the NSW Healthy Planning Expert Working Group to develop guidelines for planning, designing and developing a healthy built environment”.

The HPEWG recommends each of the District Plans should instead be more action oriented and focus on the actual implementation of these Guidelines, which we recommend should sit under the Liveability Framework and complement *Better Placed*.

We note that the concept of ‘design-led planning’ is promoted in the draft District Plans. Whilst we note the proposed role of *Better Placed* as providing guidance on ‘design-led planning’, including urban design and architecture at the district and local level, we recommend that clearer articulation of design-led planning is required in the draft district plans, particularly in the context of supporting health planning priorities. We acknowledge that there are strengths in design-led planning, but the connections to health outcomes are not well articulated in the draft District Plans, and the detail on what design-led planning actually looks like in practice is missing. The role of urban design in providing supportive environments for healthy living, including community connectedness, and in furthering community health and wellbeing is well established. We recommend therefore that the definition of good urban design makes explicit the positive health and wellbeing outcomes of good urban design eg include ‘to promote community health and wellbeing’ as a principle objective of good design.

We also note that the draft District Plans do not clearly address the relationship between the Liveability Framework, *Better Placed* and the proposed Guidelines for Safe and Healthy Built Environments and we seek clarification on this. A few questions for consideration include:

- Is the Liveability Framework the broad overarching document addressing the Liveability and other provisions of the District Plans? If so, this should be stated up-front in the District Plans.
- How do the Guidelines for Safe and Healthy Built Environments relate to both – addressing elements of the Liveability Framework, providing guidance on healthy planning issues and actions not covered by *Better Placed*?
- A conceptual diagram explaining how they work together should be provided up-front in the District Plans or under the ‘Liveability’ chapter.

9. Include a broader range of examples of how safe and healthy places will be facilitated by a range of planning system mechanisms. Some examples include the use of design guidelines in practice, the integration of healthy built environment and active travel objectives in the Local Environment Plan (LEP) template, use of Health Impact Assessment (HIA) in certain circumstances, and including conditions of consent that require healthy design outcomes.

We are very supportive of the intent to facilitate the development of healthy and safe places. However, the narrow list of considerations for planning authorities under this priority are either very broad (e.g. facilitate the development of healthy and safe built environments) or very specific (e.g. floor space bonuses for provision of walking and cycling connections to school). The range of considerations needs to be substantially extended.

While floor space bonuses are one mechanism that can stimulate development of health supporting infrastructure, they are by no means the only mechanism available, nor applicable to the wide range of development that should be contributing to the development of healthy places. The Plans need to more clearly specify how the development of healthy and safe built environments will be achieved beyond this mechanism, that by default can only apply to higher density development.

10. Ensure increases in density are matched with appropriate increases in social infrastructure, employment options, a diversity of high quality open and green space, and high frequency public transport, and walking and cycling connections.

The draft District Plans identify a shift to a more urban form for greater Sydney. While we support containment of urban sprawl, to address car dependence, social disconnection and increased distances between home, work and other key destinations, we argue that the precautionary principle must apply as Sydney transitions to a higher density city. A denser Sydney needs to focus on the needs of people and their health and wellbeing first. We support the concept of 'mixed density', with a balance of housing options in all locations, to ensure choice and meet the needs of a demographically diverse population. We also caution that density is about much more than housing. It is the density of jobs, local destinations, transport options, and green and open space that influence healthy behaviours (such as walking, social connection), along with residential density⁶. Any increases in density must be matched with appropriate increases in high quality open space, access to green space and high frequency public transport, as well as walking and cycling connections to local centres and public transport. The District Plans also need to ensure early delivery of adequate social and community infrastructure to cope with population increases.

11. Action Shelter NSW's recommendations in regards to social and affordable housing priorities and actions.

We strongly endorse the inclusion of an Affordable Rental Housing Target in the District Plans and congratulate the Greater Sydney Commission for including a target as a form of inclusionary zoning. It is now well established that Sydney is one of the least affordable housing markets globally, which has fundamental consequences for health, equity and the wellbeing of our population. We believe however that a more ambitious target is required to really begin to address the issue of housing affordability for community members on low (and middle) incomes.

⁶ Udell T, Daley M, Johnson B, Tolley R. *Does Density Matter? The role of density in creating walkable neighbourhoods*. Melbourne: National Heart Foundation of Australia, 2014 Available at www.heartfoundation.org.au/density

We strongly support the 5 key recommendations put forward by Shelter NSW (the peak agency for greater housing equity in NSW) to promote affordable housing in NSW. These can be found at <https://shelternsw.org.au/news/shelter-releases-its-submission-greater-sydney-commission>

12. Detail more specific actions (including mode share hierarchy and targets) for increasing walking, cycling and their links with public transport use. Align District Plan actions with the planned update to the Long Term Transport Masterplan.

We strongly support better walking and cycling connections, and argue that this priority needs more specific actions and indicators to demonstrate how it will be achieved. Along with mixed land use and other urban design attributes, entire networks of walking and cycling connections, and their integration with public transport are required for active travel both *within and between* centres, and across Districts. The draft District Plans refer to a Walkability Tool being developed by Transport for NSW, but no corresponding action is included about how this tool will be used in practice to enhance walkability where it is needed most. Similarly, actions should be included in the District Plans that leverage Transport for NSW's Principal Bicycle Network for Sydney. Clear linkage with updates to the Long Term Transport Master Plan update is also required

A SUSTAINABLE CITY

13. Increase the capacity of the Green Grid to create a more equitable city by developing funding criteria that prioritises projects in areas of highest need, based on Green Grid strategic objectives. (For example, using SEIFA and health indices, chronic disease hotspots, areas most vulnerable to urban heat island risk).

We strongly support the concept of the Green Grid, and consider it a key strategy for health, greater social inclusion and healthy living, particularly the integration of physical activity into daily life, as well as mitigating the urban heat island effect. The District Plans need to ensure the protection of existing green spaces as well as plan for new or improved green spaces/amenities, particularly more urban parks and innovative green spaces (such as conversion of existing grey spaces such as roads or roof tops) in areas under population pressure.

In line with the principle of greater equity that should underpin the District Plans, we believe the existing funding programs for addressing gaps or improvements in the Green Grid should contribute to greater **equity in access** to walking and cycling connections and quality green & open space across Sydney's districts.

We agree that updated guidance for Councils and planning authorities is urgently needed regarding open space planning for varying housing densities. Metrics that encompass both quantitative and qualitative standards (and definitions) are required, supported by best practice case studies for a range of densities. These open space planning tools & methodologies need to apply to a diversity/hierarchy of green and open space, and include sports grounds and facilities.

14. Include an action to develop guidance for local councils on how they can promote and facilitate access to healthy food through the planning system.

The inclusion of healthy food related priorities and actions in the draft District plans could be greatly enhanced. There is brief reference to design-led planning outcomes related to 'urban agriculture, community and roof top gardens for productive food systems' (e.g. pg. 118 WC), and an acknowledgment that healthy built environments can facilitate access to fresh seasonal food. These words need to be

supplemented with additional actions that will guide land use decision making, protect productive or potentially productive agricultural land from development and support local government action.

We support the inclusion of floor space incentives for community and roof gardens (Liveability Priority 5), but this action is not sufficient alone and there is much more that the planning system can do to support food security and healthy food access. An excellent example of guidance and policy templates for Councils is the Northern Rivers *Securing our Food Future*⁷ project, and encompasses community gardens, farmer's markets, road side stalls, public space gardens and waste reduction. The Commission could prepare a suite of guidelines and templates for the greater Sydney Councils, using this as an example.

⁷ Securing our Food Future <http://rdanorthernrivers.org.au/food-futures-council-resources/> Accessed 13 March 2017

Attachment A: NSW Healthy Planning Expert Working Group – Terms of Reference and Membership

Background

The Healthy Planning Expert Working Group (HPEWG) is an independent NSW expert group, formed in 2012. The group successfully advocated for the inclusion of a health objective in the draft NSW Planning Bill (2013) and inclusion of Action 3.3.1 in *A Plan for Growing Sydney* (the regional strategy for Greater Sydney) which identifies the need to prepare healthy planning guidelines that will encourage the development of healthy communities.

The group continues to engage with the Department of Planning and Environment around healthy planning matters in planning policy and legislation. It sees its role as one of advocacy and provision of expert advice.

Membership is upon invitation and is voluntary.

Purpose

1. Provide advice and guidance on strategic opportunities to utilise the NSW Planning system to promote human health across the State.
2. Provide advice and guidance on the dissemination, application and utilisation of 'healthy planning research'.
3. Initiate and build sustainable partnerships across NSW Government, industry, the community sector and academic healthy planning stakeholders to advocate about NSW healthy planning issues.

Membership Criteria

Criteria for membership include:

- Membership to be primarily Agency/enterprise based, with a limit of up to two representatives per Agency. Agencies to select their own appropriate representative/s with one vote allocated per Agency when required for relevant HPEWG matters.
- Individuals with appropriate experience and knowledge may be approved to join the group at the discretion of the Chair.
- Representatives should have demonstrated healthy planning expertise across planning, development and/or design and commit to contributing towards HPEWG agreed actions.
- Membership should be responsive to current priority actions and expand as required by inviting additional appropriate representatives from relevant Agencies/groups.
- New members to be officially invited by the Chair.

Deliverables

- Advocacy to improve healthy built environments in NSW.
- Constructive input into the development of Healthy Planning/Design Guidelines.
- Support for active transport objectives and targets.

Resources

A small budget allocation is provided to assist in meeting advocacy objectives by means of workshops and commissioned pieces of work.

Current Membership

Agencies/organisations currently represented on the HPEWG are:

- Australian Institute of Landscape Architects
- City Wellbeing Program, City Futures Research Centre, University of NSW
- Council on the Ageing NSW (COTA)
- Department of Planning and Environment
- Hunter New England Local Health District
- Local Government NSW
- NSW Ministry of Health
- National Heart Foundation – NSW Division
- Northern Sydney Local Health District
- NSW Office of Sport
- NSW Office of the Government Architect
- Office of Local Government NSW
- Planning Institute of Australia
- South Western Sydney Local Health District
- University of Sydney
- Western Sydney Local Health District

Structure of the HPEWG

The Chair of the HPEWG is Norma Shankie-Williams, Strategic Planning Team Leader, Willoughby City Council.

The Facilitator of the HPEWG is Danny Wiggins, consultant.

The Secretariat for the HPEWG is provided by the National Heart Foundation – NSW Division. This role includes preparation of agendas and meeting papers, minute taking, pre-meeting briefings with the Chair, meeting and workshop arrangements and coordination of guest speakers. For further information, please contact Emily Fletcher, Project Officer – emily.fletcher@heartfoundation.org.au

Meeting Frequency

The HPEWG meets approximately four times a year. Meetings are held, where possible, in the Heart Foundation Boardroom, Level 3, 80 William Street, East Sydney.

For particular submissions/pieces of work, additional meetings may be called as required. Sub-groups or smaller working groups may be established for particular projects/submissions, and may meet more frequently independently of the larger group.

Review

These Terms of Agreement were approved on 15.02.2017. They will be reviewed in two years from this date.

Attachment B: HPEWG Healthy Planning Priorities – Submission to the Greater Sydney Commission July 2016

Healthy Planning in Sydney’s Districts: Priorities, Actions and Mechanisms for Implementation

These priority recommendations of opportunities to incorporate healthy planning matters within the forthcoming Sydney Metropolitan District Plans were prepared by the NSW Healthy Planning Expert Working Group (HPEWG) following a request by the Greater Sydney Commission (GSC). A list of HPEWG member agencies that have contributed to the recommendations are attached (see Attachment A).

1. Strategic Context

The *Environmental Planning and Assessment Act* (the Act) requires District Plans (DP) to include the “basis for strategic planning in the district, having regard to economic, social and environmental matters” (s. 75AD(3)). To satisfy this requirement, each DP should open with a statement on Strategic Context. First and foremost in this statement should be a reiteration of the focus on liveability and health in the Sydney Metropolitan Plan A *Plan for Growing Sydney*, with particular reference to Goal Three and, specifically, Direction 3.3 (“Create healthy built environments”).

In further satisfying legislated requirements to consider other government policies and plans (s. 75AD(4)(d4)), each DP should also make distinct reference to:

- The Premier’s priority of ‘Tackling Childhood Obesity’
- Long Term Transport Master Plan and supporting walking and cycling strategies
- The State Government’s Healthy Eating and Active Living Strategy
- Crime Prevention Legislative Guidelines

2. Priorities, Outcomes, Implementation

The table below lists six Healthy Planning Priorities. The second column of the table provides a snapshot outcome of what each priority might look like on implementation across Sydney’s Districts. Each outcome is justified by reference to robust empirical evidence and could be incorporated into each DP’s ‘dashboard’. The final column outlines several specific implementation mechanisms for the six Healthy Planning Priorities.

These Priorities have been selected because they are evidence based, informed by existing NSW Government policy, can be implemented in the short term and have outstanding potential to positively improve the health of Greater Sydney’s residents.

Healthy Planning Priority	What does this look like across Sydney's Districts?	Proposed implementation mechanism
<p>1. Make green open-space readily accessible in our Districts.</p>	<p>Every person in the District lives within 400 metres walking or wheeling distance of well maintained, safe and useable local green space and no more than 800 metres from a higher quality district or regional open spaceⁱ.</p>	<p>Implement the Green Grid project.</p> <p>All school areas have open spaces for both students and co-use by the community outside of school hours (community use of schools as a Local Environment Plan (LEP) provision)</p> <p>Prioritise provision of upgrades to open space (eg allocation of Metro Greenspace and Green Grid funding) according to local need by considering relative access to open space, obesity rates and socio-economic (SEIFA) characteristics.</p>
<p>2. Ensure higher residential density is well designed and liveable.</p>	<p>The District's high residential density zones are located within 400-800 metres of <u>high frequency</u> transport nodesⁱ.</p> <p>High residential density is consistently co-located with shops, services and a diversity of green open spacesⁱⁱ.</p>	<p>Enforce and monitor SEPP 65 and the associated Apartment Design Guidelines.</p> <p>Develop a robust and defensible standard of the level of public transport service required to justify increased residential densities.</p> <p>Develop a tool for assessment, monitoring and implementation of the health promoting capacity of new developments similar to that developed for BASIX. The Healthy Urban Development Checklistⁱⁱⁱ provides an excellent starting point.</p>
<p>3. Create diverse and widespread opportunities for recreational physical activity.</p>	<p>The provision of recreational opportunities are coordinated at the District scale. A variety of well-maintained and diverse facilities is provided^{iv}.</p>	<p>Prepare a sport and active recreation plan for each District in consultation with the Office for Sport.</p>
<p>4. Make walking, wheeling and cycling the obvious and easy option.</p>	<p>Every street in the District has a well-maintained, sealed and unobstructed footpath on both sides^v.</p>	<p>Require preparation of a Public Domain Plan for all centres.</p>

Healthy Planning Priority	What does this look like across Sydney's Districts?	Proposed implementation mechanism
	<p>A network of off-road and separated cycleways is coordinated at the District scale to prioritise commonly accessed destinations such as schools, employment uses and shops^{vi}.</p>	<p>Support councils to develop a Pedestrian Access and Mobility Plan.</p> <p>Require Cycling Strategies of neighbouring councils to be coordinated to ensure connectivity of networks.</p> <p>Ensure streets are designed using 'Complete Street^{vii}' design principles.</p> <p>In assessing an individual application for development, ensure attention is paid to the interface between the proposed development and the public domain.</p> <p>Promote the development and implementation of workplace travel plans and end of trip facilities for all new commercial development.</p>
<p>5. Facilitate connected, safe and inclusive communities.</p>	<p>The District's community is provided with both the skills and the mechanisms to contribute to the way their District is planned and managed^{viii}.</p> <p>New development supports social inclusion and demographic diversity through the provision of affordable rental housing^{ix}.</p>	<p>Reinvigorate the community engagement provisions in Part Two of the Planning Bill 2013 (and as featured in the current legislative review options).</p> <p>All new housing is to be designed and constructed to a minimum three Green Star rating as well as incorporate Universal Housing Design Guidelines.</p> <p>Adopt a target of 15% of the new dwellings to be developed in urban renewal precincts and greenfield release areas to be provided as affordable housing.</p> <p>Promote implementation of 'inclusionary housing' across Greater Sydney, by amending clause 9 of SEPP 70 to expand the number</p>

Healthy Planning Priority	What does this look like across Sydney's Districts?	Proposed implementation mechanism
	<p>Streets and open spaces are designed to be safe and prevent opportunities for crime^x.</p>	<p>of Local Government Areas identified as having a need for affordable housing^{xi} and amend Council LEPs accordingly (see Section 3 below).</p> <p>Section 94 plans be reviewed and updated to have a focus on social and community infrastructure to support the specific / individual character of the local community as identified in Community Strategic Plans / District Plans.</p> <p>Continue to apply the dwelling mix requirements in the Apartment Design Guidelines (SEPP 65)</p> <p>Ensure development is in accordance with Crime Prevention Through Environmental Design (CPTED) guidelines by appropriate consultation with NSW Police Force.</p>
<p>6. Provide equitable access to fresh, healthy food.</p>	<p>People living in the District's urban and suburban areas are within 800 metres of an opportunity to purchase fresh food^{xii}.</p> <p>Peri-urban agricultural lands are protected for food production^{xiii}.</p> <p>Opportunities are provided for people to grow food in urban areas such as community gardens, roof top gardens and verge gardens^{xiv}.</p>	<p>Continue and complete the mapping of retail food premises and location relative to other uses.</p> <p>Develop a NSW Government planning policy framework to assist local councils control the type and location of food outlets, including reconsideration of the definition of retail premises (Group Term and Specific Uses) and inserting appropriate locational criteria for specific uses.</p> <p>Promote a suite of standard policies, forms and templates for the use of urban areas for healthy food production, trade and consumption. The tools developed by the Northern Rivers 'Securing Our Food Future' provide a kit of standard documents and forms.</p>

Healthy Planning Priority	What does this look like across Sydney's Districts?	Proposed implementation mechanism
		Consider incentives for the construction and maintenance of roof top gardens including statutory amendments such as an LEP provision or amendment to the ADG to provide bonus height or FSR as an incentive.

3. Over-arching implementation mechanisms

Evidence and global best practice in healthy cities emphasises the need to embed health as a legislated objective in urban planning policy if its potential is to be realised.

The HPEWG's recommendation to the GSC is that healthy planning needs to be included as an Aim in every LEP.

Section 75A(3) of the Act requires Councils to amend their LEPs as soon as practicable to give effect to the provisions of a District Plan.

We propose that the following clause be inserted into Part 1, "Aims of the Plan" for each LEP as it is revised to satisfy the requirements of the District Planning process:

"The particular aims of this Plan are as follows:

...to protect and promote the health and well-being of current and future residents of [*insert local government area name*]"

We further recommend that each LEP include specific zone objectives for commercial core and other centres, and medium/high density zones, relating to maximising active transport. See, for example, the Pittwater LEP.

These fundamental statutory amendments, would work to implement the Healthy Planning Priorities. They could be introduced incrementally by individual councils or metro/state wide via an amendment to the Standard Instrument Order.

^[i] Giles-Corti B, Broomhall MH, Knuiaman M, Collins C, Douglas K, Ng K, et al. Increasing walking: How important is distance to, attractiveness, and size of public open space? American Journal of Preventive Medicine. 2005;28(2, Supplement 2):169-76.

^[i] Kamruzzaman, M., D. Baker, S. Washington and G. Turrell (2014). "Advance transit oriented development typology: case study in Brisbane, Australia." Journal of Transport Geography 34: 54-70.

^[ii] Udell et al, 2014. Does Density Matter? The role of Density in Creating Walkable Neighbourhoods. Heart Foundation

^[iii] Healthy Urban Development Checklist <http://www.health.nsw.gov.au/urbanhealth/Pages/healthy-urban-dev-check.aspx>, Accessed 21 July, 2016.

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- iv Kaczynski AT, Potwarka LR, Saelens BE. Association of Park Size, Distance, and Features With Physical Activity in Neighborhood Parks. *American Journal of Public Health*. 2008;98(8):1451-6.
- v Rosenberg D, Ding D, Sallis JF, Kerr J, Norman GJ, Durant N, et al. Neighborhood Environment Walkability Scale for Youth (NEWS-Y): Reliability and relationship with physical activity. *Preventive Medicine*. 2009 Aug-Sep;49(2-3):213-8.
- vi Pucher J, Dill J, Handy S. Infrastructure, programs, and policies to increase bicycling: An international review. *Preventive Medicine*. 2010 1//;50, Supplement:S106-S25.
- vii SA Active Living Coalition, Streets for People, Compendium for South Australian Practice: www.healthybydesignsa.com.au/resources/s4pdocuments/
- viii Tesoriero, Frank & Ife, J. W. (James William), 1946-. *Community development : community-based alternatives in an age of globalisation*. 3rd ed 2010, Community development : community-based alternatives in an age of globalisation, 4th ed, Pearson Australia, Frenchs Forest, N.S.W
- ix Mueller, E. J. and J. R. Tighe (2007). "Making the case for affordable housing: Connecting housing with health and education outcomes." *Journal of Planning Literature* 21(4): 371-385.
- x Foster S, Giles-Corti B. The built environment, neighborhood crime and constrained physical activity: An exploration of inconsistent findings. *Preventive Medicine*. 2008;47(3):241-51.
- xi FACS's Centre for Affordable Housing identifies 25 areas as having a high need and 35 areas as having a moderate need for affordable housing, while SEPP 70 currently identifies only three areas. See www.housing.nsw.gov.au/centre-for-affordable-housing/for-planners-of-affordable-housing/where-do-we-need-affordable-housing
- xii Zenk, S. N., A. J. Schulz, B. A. Israel, S. A. James, S. M. Bao and M. L. Wilson (2005). "Neighborhood racial composition, neighborhood poverty, and the spatial accessibility of supermarkets in metropolitan Detroit." *American Journal of Public Health* 95(4): 660-667.
- xiii Condon, P. M., K. Mullinix, A. Fallick and M. Harcourt (2010). "Agriculture on the edge: strategies to abate urban encroachment onto agricultural lands by promoting viable human-scale agriculture as an integral element of urbanization." *International Journal of Agricultural Sustainability* 8(1-2): 104-115.
- xiv Mason, D. and I. Knowd (2010). "The emergence of urban agriculture: Sydney, Australia." *International Journal of Agricultural Sustainability* 8(1-2): 62-71.