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Draft Metropolitan Strategy for Sydney to 2031

Submission by the Healthy Built Environments Program

June 2013

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Faculty of Built Environment

Healthy Built Environments Program



THE HEALTHY BUILT ENVIRONMENTS PROGRAM

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Introduction

The Healthy Built Environments Program (HBEP) welcomes the opportunity to comment on the NSW Government's *Draft Metropolitan Strategy for Sydney to 2031*.

The HBEP is an innovative collaboration that brings the built environment and health together. The Program is situated in the City Futures Research Centre, Faculty of the Built Environment at the University of NSW (UNSW). The HBEP receives its core funding from the NSW Ministry of Health. It is directed by Associate Professor Susan Thompson, and supported by a team of inter-disciplinary partners from across the health and built environment professions working in the public, not-for-profit and private sectors. The Program fosters cross-disciplinary research, delivers education and workforce development, and advocates for health as a primary consideration in built environment plan, policy and decision-making. It brings the combined efforts of researchers, educators, practitioners and policy makers from the built environment and health sectors to the prevention of contemporary health problems.

The Program's website has more information about the integration of human and environmental health considerations with the built environment. It also provides links to useful resources, many of which present evidence for the inclusion of specifically focused health and well-being policies, provisions and actions in the urban planning process.

See: <http://www.be.unsw.edu.au/programmes/healthy-built-environments-program/about>

For questions about this submission please contact Associate Professor Susan Thompson, Director, Healthy Built Environments Program. Email: s.thompson@unsw.edu.au; Phone: 9385 4395.

Acknowledgments

In preparing the HBEP's submission, the work of Dr Jennifer Kent, HBEP Research Associate, is gratefully acknowledged.

Framing Health in the Metropolitan Strategy

The *Draft Metropolitan Strategy for Sydney 2031* (released March 2013) (hereafter called the *Draft Strategy*) provides the NSW Government's vision for Sydney to 2031. The *Draft Strategy* provides themed actions and objectives to guide strategic planning across the Sydney metropolitan area. It identifies specific delivery tools, timeframes, lead agencies and other key partners involved in ensuring the specified actions are delivered.

The *Draft Strategy* has been prepared concurrent to the review of the NSW Planning System. Through the proposed provisions of this review for Regional Growth Plans (RGPs), the adopted strategy for Sydney will be the first of a series of strategic plans to be given greater legislative weight than has been awarded metropolitan planning in the past.

The HBEP commends the planning review process for its inclusion of the term "health" in the objectives of the draft Planning Bill (section 1.3(1)(f)). Given the *Draft Strategy* is essentially positioned as a model RGP, we consider it not only imperative but logical that it carry through the renewed focus on health that will be in the new NSW planning system.

The many significant human health benefits of well-planned built environments cannot be overstated. **It is therefore essential that the Government continue to frame health as a central policy component in the Metropolitan Strategy for Sydney.** Recent research has shown that health-related goals and objectives in planning documents raise awareness of public health issues and have a positive impact on population health outcomes. Given the urgent need to address contemporary health epidemics such as obesity, cardiovascular disease, diabetes and mental illness, and their associated economic and social costs, it is paramount that health features prominently throughout the new Strategy. Further, the inclusion of health is critical given the potential for metropolitan strategies to orient government decision-making and investment for many years into the future.

Our specific and up-front recommendations for framing health as a central policy component within the current proposed (draft) structure of the plan are as follows:

Specific Recommendation:

The vision for Sydney, as articulated on page 4, should be “A strong global city – a liveable and healthy local city”.

Specific Recommendation:

The guiding principles for the strategy, as articulated on page 7, should include the principle to: “Promote and facilitate growth throughout Sydney in a way that promotes the health and well-being of Sydney’s existing and future population”.

Specific Recommendation:

The terminology for the five key outcomes for Sydney, introduced on page 6, should be amended as follows:

- The second of the key outcomes should be “A Healthy and Liveable City”.
- The fourth of the key outcomes should be “An Environmentally Sustainable and Resilient City”.

There are many other opportunities throughout the *Draft Strategy* to incorporate human health and well-being as a more explicit focus. The remainder of the HBEP’s submission uses an established evidence base to provide recommendations as to how this can be done.

An Evidence Base for Health in the *Draft Strategy*

The HBEP has completed a major scholarly literature review examining the role of the built environment in supporting human health as part of everyday living (Kent, Thompson and Jalaudin 2011). The principal aim of the Review is to establish an evidence base that supports the development, prioritisation and implementation of healthy built environment policies and practices. The focus of the Review is on the three key built environment domains that support human health:

- The Built Environment and Getting People Active.
- The Built Environment and Connecting and Strengthening Communities.
- The Built Environment and Providing Healthy Food Options.

These built environment domains address some of the major risk factors for contemporary chronic disease, including physical inactivity, social isolation and obesity. The review can be downloaded from the HBEP's website at: <http://www.be.unsw.edu.au/programs/healthy-built-environments-program/literature-review>.

Fact Sheets which contain key research findings from the Review in a succinct form, together with implications for policy and practice, can also be downloaded from the website. These documents won a NSW Planning Institute of Australia award for Research Excellence in 2012.

The HBEP's response to the *Draft Strategy* is structured around the evidence supporting these three domains. Each domain is considered, citing relevant key messages from the Literature Review's executive summary (see Kent et al. (2011) pages 14-15), which in turn will frame our recommendations on the *Draft Strategy*.

The Built Environment and Getting People Active

On Density:

Key Research Message: Keeping necessary trip distances short through mixed use and compact development will help to make active transport a viable option.

....

Increasing the residential density of the built environment alone, however, will not necessarily encourage increased physical activity. Density, mixed use and micro-design elements in some combination are most likely to influence levels of physical activity. (Kent et al. page 14)

The *Draft Strategy* accommodates Sydney's growth through a focus on the strengthening of existing local and town centres. The *Draft Strategy* is to be commended for this focus, because it will allow for the provision and/or retention of services in already populated areas, thereby enabling an increase in destinations considered "actively accessible" (ie. accessible by walking, cycling or public transport). Strategic increases in density will also sponsor the ongoing provision and maintenance of key infrastructure in established areas. This infrastructure includes Sydney's public transport network, areas of green open space and other public places suitable for incidental social interactions and organised community activities which are both integral to human health.

Areas of higher density and mixed uses can be supportive of human health and wellbeing. However, their infiltration into our existing city based on cultural attachments to lower density living must be managed carefully such that these health benefits can be realised.

The structure of the new "Land Release Policy" will need to guarantee that new areas developed into the Metropolitan Rural Area are both serviced by infrastructure and supplied with jobs. By providing infrastructure and services in place, and the opportunity to work close to home, new urban areas enable active accessibility and decrease the need to travel long distances by private car. This infrastructure needs to be in place prior to development in order to facilitate the uptake of new, healthier ways of travelling and living. Any time lag in the provision of infrastructure erodes opportunities for incoming residents to try and adopt alternatives such as cycling, public transport, using open space or shopping locally.

HBEP recommends that maintaining the *Draft Strategy's* focus on plan integration will be crucial to ensure infrastructure provision is at least concurrent to, or preceding, density increases in existing areas.

Specific Recommendation:

Policy d. under Objective 5 (*Draft Strategy* page 30) should state “Infrastructure will be delivered concurrent to housing growth”.

We further recommend that urban renewal in the existing Metropolitan Urban Area needs to be carefully designed to maximise amenity both in public and private areas. Where higher density living is proposed, the development and application of best practice design standards through design guidelines will ensure development of new areas that are healthy places to live. Some key guidelines include:

- Protection of acoustic and visual privacy to ensure higher density housing affords a homely retreat, as well as community.
- Provision of areas of public and private green open space to ensure easily accessible opportunities for contact with nature, which is essential for good physical and mental health.
- Provision of facilities and infrastructure on-site to support transport alternatives to the private car. This might include facilities for the storage of bikes or car parking spaces for exclusive use by car sharing organisations.
- Provision of easily accessible and attractive stair ways to encourage use of the stairs whenever possible.

Specific Recommendation:

Policy c. should be added under Objective 6 (*Draft Strategy* page 32) to state that “New housing will be developed in accordance with design guidelines that have promotion of the health and well-being of residents as a key objective.”

On Active Transport:

Key Research Message: *Well-maintained footpaths and bike paths encourage walking and cycling for transport, as does the provision of bike parking and other end of trip facilities. Perceptions that cycling is unsafe because of traffic, and perceptions that walking is unsafe because of exposure to crime, are key infrastructure related deterrents to walking and cycling for transport and recreation. (Kent et al. 2011, page 14)*

The integration of the *Draft Strategy* with the *NSW Long Term Transport Masterplan* is an undeniably challenging, yet highly commendable, goal of the *Draft Strategy*.

By focusing growth in centres, and pursuing connectivity, the *Draft Strategy* seeks to encourage the use of cycling, walking and public transport. While this is also commendable, we recommend that the *Draft Strategy* acknowledge more explicitly that these transport modes need to be supported by infrastructure and policy that make them safe and appealing to Sydney's residents. This includes not only the provision of well-maintained and connected networks for active transport, but the provision of segregated cycleways, end of trip facilities, bike parking and signage. It also includes policies such as reduced speed limits in urban areas and better enforcement of laws pertaining to the use of shared pathways and cycleways. While the HBEP understands that the *Draft Strategy* is not the place to specify detailed design guidelines, we recommend that any policy aiming to promote the use of active transport has, as an explicit aim, the need to make these modes safer, more comfortable and more appealing.

Further, the *Draft Strategy* fails to acknowledge the importance of other emergent healthy and sustainable modes of transport in making a less-car dependent transport system work. Specifically, we recommend that the *Draft Strategy* acknowledge car sharing as a mode that is key to making networks of transport alternative to the private car more appealing and feasible. Those who share cars are more likely to use other alternatives such as cycling, walking and public transport. Recent research demonstrates that easy access to such schemes is a key tool for those seeking to transition away from private car ownership and use, particularly in cities currently characterised by private car dominance.

In terms of the use of specific terminology, HBEP also recommends that the well-researched health benefits of public transport be acknowledged, along with those associated with walking and cycling.

Specific Recommendation:

Paragraph 2, column 2, page 70 should read “Walking, cycling and public transport use have demonstrable health benefits”.

On Open Space:

Key Research Message: People with access to good quality and safe open space are more likely to be physically active for recreation. (Kent et al. 2011, page 14)

The *Draft Strategy* is to be commended for acknowledging the importance of providing adaptable open space, particularly through Objective 9. There is an emphasis in this Objective, however, on the provision of regional connections between open space areas through trails and pathways. While this emphasis rightly provides opportunities for walking and cycling, there is no specific mention of the importance of protecting and maintaining other areas of green open space. These are areas which may not be connected to other recreational opportunities, but nevertheless remain connected to the places where people live and work. We recommend that this Objective contain an explicit focus on the ongoing preservation of existing areas of green open space. This will be particularly important considering the *Draft Strategy's* overt focus on the market-driven delivery of multi-unit housing.

Specific Recommendation:

Policy relating to Objective 9 should explicitly recognise the need to protect and enhance open space in existing areas. The need to provide open space other than connected walking and cycling trails should be explicitly mentioned in the preamble to this Policy set in Objective 9.

Open space that is adaptable and accessible to all will include an array of opportunities for recreation and time-out beyond walking and cycling. HBEP recommends that this Objective should specifically acknowledge other uses such as the provision of outdoor gyms, children's play equipment, playing fields for organised sport, quiet natural places for reflection, as well as community gardens and urban orchards.

The Built Environment and Connecting and Strengthening Communities

On the Importance of Context:

Key Research Message: Community is complicated. This relates to demographic, cultural, ability, socio-economic and other attributes. What works to promote community in one locality, within a particular group or at one time, will not necessarily translate to another (Kent et al. 2011, 14)

The HBEP commends the *Draft Strategy* for its emphasis on working with local government and the community, particularly in the delivery of the objectives related to the key outcome of 'A Liveable City'. Many of the objectives proposed by the *Draft Strategy*, however, impact on diverse communities, and subsequently necessitate the development of contextual understandings of the impacts of change. HBEP recommends a maintained emphasis on engagement with the local community. This recommendation is further addressed below under the heading "On Education and Participation".

On Place-Making:

Key Research Message: Casual encounters with community can occur anywhere. Incidental interactions become building blocks of community. (Kent et al., page 14)

The HBEP commends the *Draft Strategy's* attention to the importance of maintaining Sydney's rich and diverse cultural and built heritage. We recommend that the *Draft Strategy* explicitly acknowledge the capacity that well designed public places have to encourage incidental and planned social interactions. Further, HBEP is concerned that the *Draft Strategy* has an overt emphasis on place making in new urban areas. As Sydney's population grows and becomes more diverse, there are opportunities to enhance public space for incidental social interactions not only in new urban areas but also in existing

neighbourhoods. New populations will not only move to new centres – existing housing stock, and existing suburbs, will also be populated by people from diverse backgrounds. These people will have aspirations and anticipations about the new communities they will find in their Sydney. HBEP recommends that policy in the *Draft Strategy* explicitly recognises the need to promote good urban design and pursue novel ways to engage with the community in existing centres.

On Education and Participation:

Key Research Message: The built environment can promote orderly social interaction by removing ambiguity in expectations and educating communities about behavioural norms.

Participation in shaping the built environment supports interaction and psychological health directly by encouraging a sense of empowerment and custodianship. The way the built environment is governed can foster this participation. (Kent et al. 2011, page 15)

A great city like Sydney will be shaped not only by places but also by the people who live, work and play in those places. Sydney's people present as much opportunity for change as the places they inhabit. People will shape how the city functions and are critical for the delivery of the city's vision.

Many of the directions implied by the *Draft Strategy*, including increases in density, the uptake of active transport, and the transition to mixed use rather than single use urban form, require substantial cultural transition and adaptation. The *Draft Strategy* itself can play a key role in facilitating this adaptation in a number of ways.

First, the *Draft Strategy* must acknowledge that it will be incremental shifts in the ordinary, everyday practices of Sydney's people that will make the Strategy work. HBEP recommends that Sydney's people should be listed as a "city shaper" with priorities for the education and consultation of the population factored into the *Draft Strategy's* desired outcomes. Second, the consultation process envisaged for further refinement and implementation of the *Draft Strategy* can be viewed as an educational opportunity. By involving people in meaningful consultation, and prioritising consultation not only as a way to hear but also to learn, can assist in behaviour change. The HBEP understands understand that the details of the consultation process to underpin further development and implementation of the *Draft*

Strategy are contained in the White Paper recently released as part of the reform of the NSW planning system. Further comment and recommendations on this process will be made in the HBEP's submission to the White Paper and draft legislation.

Specific Recommendation:

Sydney's people should be listed as a tenth "City Shaper" (*Draft Strategy*, pages 18-27) . Specific priorities for the education and consultation of the population should be factored into the *Draft Strategy's* desired outcomes.

The Built Environment and Providing Healthy Food Options

On Healthy Food Access:

Key Research Message: There is a logical link between exposure to healthy food options and healthy eating (Kent et al 2011, page 15)

Body weight status is linked to exposure to the energy dense foods often featured in convenience stores and fast-food outlets. Exposure to healthier choices offered by supermarkets is associated with the maintenance of a healthy weight.

HBEP commends the *Draft Strategy's* emphasis on the provision of retail space in all emerging and established centres. We also note the *Draft Strategy's* emphasis on the establishment of large retail stores, such as supermarkets, primarily in strategic centres that are well serviced by public transport. While we acknowledge this as a positive way to encourage multi-purpose trips, we also propose that there is a need to provide retail space for uses other than small-scale retail stores in areas outside of strategic centres. The provision of exclusively smaller retail tenancies in centres discourages the location of small to medium sized supermarkets in areas that may not be well serviced by public transport but may be within a walkable distance of the places where people live and work. HBEP recommends that explicit mention be made of the need to provide retail space for medium sized stores, such as local supermarkets, in areas other than strategic centres.

Specific Recommendation:

Objective 15 (*Draft Strategy* page 52) should specifically acknowledge the need to “encourage the location of supermarkets as retail outlets for fresh food in established and emerging centres”.

On Urban Agricultural Lands:

Key Research Message: *Urban agricultural lands play an important part in the production and supply of healthy food to urban areas in Australia and should be protected.* (Kent et al. 2011, 15)

The *Draft Strategy's* delineation of a Metropolitan Rural Area from the Metropolitan Urban Area is commendable. One of the priorities for management of the Metropolitan Rural Area is to increase the productivity of agricultural lands. By placing a focus on the ongoing management and monitoring of peri-urban agricultural lands, the *Draft Strategy* recognises the importance of the maintenance of a reliable and local source of fresh food. Of concern, however, is that while the *Draft Strategy* maps a current boundary to the Metropolitan Rural Boundary, it makes only a weak provision for the management of the encroachment of urban uses into the urban/rural interface. This effectively enables the ongoing incremental infringement of urban uses into rural areas. HBEP recommends that the *Draft Strategy's* consideration of the management of the urban/rural interface needs to explicitly protect peri-urban agricultural land from housing development, as well as uses relating to the sourcing and extraction of natural resources.

Specific Recommendation:

Priorities for Sydney's Metropolitan Rural Area (*Draft Strategy* page 27) should specifically include the “the identification and protection of high value agricultural lands”

Other General Comments

Overall, when compared with previous Metro Plans, the *Draft Strategy* has a more overt focus on market driven delivery of housing and the accommodation of business expectations. For example, the nomination of urban activation precincts is a developer led process. It is concerning that the *Draft Strategy* does not specifically propose to address the delivery of housing and urban renewal in areas that may not be 'market ready'.

The *Draft Strategy's* implementation will be key to its success. Proper implementation, including ongoing consultation, will give life to the *Draft Strategy's* proposed delivery of health related concepts such as liveability and connectivity. Implementation also provides for ongoing community consultation and involvement, the execution of which enables opportunities for community strengthening as well as education. Both are requisites for healthy built environments as communities grow and learn to use new places and spaces that support healthy behaviour as part of everyday living. The tools for consultation and implementation are specified in the Planning Reform White Paper. HBEP's submission to the *Draft Strategy* acknowledges the importance of consultation and implementation. These components of the *Draft Strategy's* delivery will be further addressed in our response to the White Paper.

Also of concern is the use of the word 'health' in relation to the protection of the biophysical environment. This is particularly perplexing in light of the inclusion of the term in the objectives of the draft Planning Bill. Here the term 'health' is obviously used in reference to the health and wellbeing of people. While we recognise that a healthy biophysical environment is critical to ensure the health of the population, HBEP contends that the use of the term in this context in the *Draft Strategy* is potentially confusing.

Conclusion

In summary, the HBEP commends the *Draft Strategy* for many of its components, including a focus on liveability and connectivity, as well as recognition of the need to protect the rural-urban interface. We are concerned, however, at the general omission of the protection and promotion of the health and wellbeing of the population as an aim of the *Draft Strategy* and the adoption of a market driven approach to planning. We recommend that the *Draft Strategy* replace its emphasis on economic growth with a more overt focus on the people who live in this city. We believe this re-orientation will result in better planning outcomes. We also believe that it will deliver a more inclusive and effective community consultation process, as well as facilitate the cultural adaptation essential to Sydney's ongoing development.

Summary of Key Recommendations

1. The vision for Sydney, as articulated on page 4, should be “A strong global city – a liveable and healthy local city”.
2. The guiding principles for the strategy, as articulated on page 7, should include the principle to: “Promote and facilitate growth throughout Sydney in a way that promotes the health and well-being of Sydney’s existing and future population”.
3. The terminology for the five key outcomes for Sydney, introduced on page 6, should be amended as follows:
 - a. The second of the key outcomes should be “A Healthy and Liveable City”.
 - b. The fourth of the key outcomes should be “An Environmentally Sustainable and Resilient City”.
4. Policy d. under Objective 5 (*Draft Strategy* page 30) should state “Infrastructure will be delivered concurrent to housing growth”.
5. Policy c. should be added under Objective 6 (*Draft Strategy* page 32) to state that “New housing will be developed in accordance with design guidelines that have promotion of the health and well-being of residents as a key objective.”
6. Paragraph 2, column 2, page 70 should read “Walking, cycling and public transport use have demonstrable health benefits”.
7. Policy relating to Objective 9 should explicitly recognise the need to protect and enhance open space in existing areas. The need to provide open space other than connected walking and cycling trails should be explicitly mentioned in the preamble to this Policy set in Objective 9.
8. Sydney’s people should be listed as a tenth “City Shaper” (*Draft Strategy*, pages 18-27) . Specific priorities for the education and consultation of the population should be factored into the *Draft Strategy*’s desired outcomes.

9. Objective 15 (*Draft Strategy* page 52) should specifically acknowledge the need to “encourage the location of supermarkets as retail outlets for fresh food in established and emerging centres”.

10. Priorities for Sydney’s Metropolitan Rural Area (*Draft Strategy* page 27) should specifically include the “the identification and protection of high value agricultural lands”

Reference

Kent, J. L., Thompson, S. M. and Jalaludin, B. B. 2011. Healthy Built Environments: A review of the literature. Sydney: Healthy Built Environments Program, City Futures Research Centre, UNSW.



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City Futures Research Centre
Faculty of Built Environment
The University of New South Wales
Sydney NSW 2052 Australia
e: hbep@unsw.edu.au
w: <http://www.be.unsw.edu.au/programmes/healthy-built-environments-program/about>

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