

31 March 2017

Ms Alison Frame
Dep Secretary Planning, Policy, Strategy and Governance
Planning Legislation Updates 2017
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Frame,

RE: THE INCLUSION OF HEALTH AND COMMUNITY RESILIENCE OBJECTS IN THE REVIEW OF THE NSW PLANNING SYSTEM

Thank you for the opportunity to contribute to the review of the NSW planning system, and specifically the public consultation draft *Environmental Planning and Assessment Amendment Bill 2017* (the Bill).

I am writing to strongly endorse the inclusion of explicit reference to both ‘health and wellbeing’ and ‘community resilience’ measures in the Objects of the Act in recognition that:

- There is growing awareness of the key role that the planning system can play in supporting community health and resilience;
- Reference to the importance of health and resilience already exist in many strategic planning documents in NSW including the State’s Regional Plans and the Greater Sydney Commission’s current draft District Plans.

While WSROC understands the need for fast planning approvals to provide increased housing supply and contribute to provision of more affordable housing, it is the role of local government, as defined by the *Local Government Act (1993)*, to facilitate communities that are ‘strong, healthy and prosperous’.

Councils take great responsibility in ensuring that proposed developments deliver well designed dwellings and urban spaces that are fit-for-purpose, promote healthy lifestyles, increase community resilience, improve social cohesion, and provide essential services required by local residents. As such, WSROC supports the elevation of the role of design to meet these outcomes.

Community health is a particularly salient issue for WSROC and its members. Western Sydney residents suffer higher levels of preventable, lifestyle related illness than those living in other areas of Sydney. Many studies have referenced the role geography and urban planning can play in facilitating healthier, more resilient communities.

For this reason, WSROC strongly supports the submission prepared by the Healthy Planning Expert Working Group (HPEWG), an independent NSW expert group comprising healthy planning experts

from the academic, planning, health, local and state government sectors, with regards to the importance of integrating health and wellbeing considerations as part of the planning process.

As such we make the following recommendations:

1. **Ensure 'Health and wellbeing is explicitly identified' as an object in the Bill**, thereby embedding it as a strategic planning outcome and setting the context for future decision making.
(The HPEWG have suggested the phrasing "*To promote the health and wellbeing of the all communities in NSW*" and we support their suggestion).
To support this, the World Health Organisation definition of health should be adopted to ensure a consistent and shared understanding of the desired outcomes.
2. **Embed health considerations in strategic planning**. To achieve this, local strategic planning statements should be used as an opportunity to reconcile population forecasts and infrastructure delivery priorities, build greater social connection and equitable access to healthy food, mitigate the urban heat island effect, and address locally occurring clusters of health disadvantage.
3. **Engage the community to create connected and inclusive communities**, where a sense of empowerment aids mental and physical wellbeing. Community participation plans offer an opportunity to achieve this, however to maintain integrity, this process must be appropriately resourced and incorporate regular timely review.
4. **Evidence based indicators should be developed** to focus delivery, evaluate healthy planning considerations, and encourage accountability in decision making. Such indicators could potentially be implemented through Development Control Plans.
5. **Increase healthy built environment expertise in decision making** by adding it to the list of preferred expertise for membership of planning bodies. This will support improved decision making and assist to optimise opportunities for consideration of health in large developments and planning proposals.

In addition to the recommendations put forward by HPEWG, WSROC also supports planning reform that strengthens community resilience during extreme heat events – particularly in residential dwellings.

The impacts of extreme heat are particularly severe in Western Sydney where temperatures typically sit well above the Sydney average during summer. Extreme heat events have been shown to increase hospitalisation and mortality rates particularly amongst the very young, ill and elderly. Heat also has an adverse impact on community infrastructure, energy networks and transport. This inadvertently has flow on impacts for community resilience.

Rapid urban development has the potential to exacerbate the impacts of extreme heat. According to the NSW Office of Environment and Heritage, extensive greenfield development in the region is expected to intensify this phenomenon over the coming decade¹.

Good design is one of the most effective ways to reduce the severity of heat events in urban areas. Measures such as those below can improve the health and resilience of communities during extreme heat events.

- Light, reflective material selection for facades and rooftops;
- Well-designed heating, ventilation and air-conditioning units in high density precincts;
- Healthy urban green cover;
- Water-sensitive urban design;
- Availability of drinking water in public places; and
- Expansion of recycled water services.

WSROC supports the work of the NSW Department of Planning & Environment to create a more integrated, dynamic and engaging vision for the future of planning in NSW and we are willing to assist the Department in any way we can.

For further information regarding this submission, please contact Kelly-Anne Gee on 02 9671 4333 or kelly@wsroc.com.au.

Yours sincerely,



Charles Casuscelli

Chief Executive Officer

Western Sydney Regional Organisation of Councils

¹ NSW Government Office of Environment and Heritage. Urban Heat. Available from: <http://www.climatechange.environment.nsw.gov.au/Impacts-of-climate-change/Heat/Urban-heat>