

12 February 2018

Greener Places
Government Architect NSW
GPO Box 39
Sydney NSW 2001



Dear Madam/Sir,

Greener Places submission

The Northern NSW Local Health District (NSW LHD) Health Promotion unit welcomes the opportunity to comment on the draft Greener Places policy developed by the Government Architect NSW.

We strongly support this policy and thank the Government Architect NSW for developing a comprehensive document that addresses the importance of 'green infrastructure' in NSW.

Background

By way of background, evidence shows that NSW has high overweight and obesity rates (52.3% adults, 22% children), poor health indicators for physical activity (43% meet recommended levels), and poor intake of fruit and vegetables (51% and 94% of people do not eat enough fruit and vegetables respectively).

Health professionals recognise the importance of the built environment in directly affecting people's health and the central role that planners play in providing environments which support healthy behaviour.¹ Of particular relevance to 'green infrastructure', research suggests that people in urban areas who live closest to the greatest "green space" are significantly less likely to suffer poor mental health.² Other research indicates that the closer residents live to green space, particularly if it is accessible or usable, the better they report their health.³ It is pleasing that *Greener Places* makes reference to research (p 16) which demonstrates the health benefits of 'green infrastructure'.

Objective

We strongly support the objective of *Greener Places* aptly articulated by the Government Architect:

"Green space is a hallmark of liveability, and by establishing a network of high-quality green areas that join towns, public transport, and residential areas, we aim to maximise quality of life and wellbeing." (p 5)

We strongly support the policy's aim "to create a healthier, more liveable and sustainable urban environment by improving community access to recreation and

¹ Thompson S, McCue P. The CHESS Principles for Health Environments: A holistic and strategic game plan for inter-sectoral policy and action. Sydney: NSW Premier's Council on Active Living; 2008 http://www.pcal.nsw.gov.au/_data/assets/file/0003/27651/chess.pdf in <http://www.health.nsw.gov.au/urbanhealth/Publications/healthy-urban-dev-check.pdf>, p 8 [hardcopy page numbers]

² <https://theconversation.com/green-for-wellbeing-science-tells-us-how-to-design-urban-spaces-that-heal-us-82437>

³ <https://theconversation.com/how-urban-bushland-improves-our-health-and-why-planners-need-to-listen-72876>

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exercise, supporting walking and cycling connections, and improving the resilience of urban areas.” (p 10)

Implementation & legislative weight

We support the statutory measures articulated in 3.2, particularly aspects relating to model DCP clauses and the inclusion of ‘green infrastructure’ in regional/district/infrastructure plans as ‘essential infrastructure’ (p 46).

However, in order to ensure implementation, *Greener Places* should be given legislative weight using the objects of the *Environmental Planning and Assessment Act 1979* (“*EP&A Act*”). Not giving *Greener Places* this high level status risks the policy being merely a voluntary consideration for decision makers rather than shaping planning and development outcomes in NSW.

The GANSW is cognisant of the need for *Greener Places* to operate within the statutory framework of NSW planning laws. Section 3.1 ‘Implementation’ provides:

*Effective implementation will require: — Statutory measures – the final **Greener Spaces** policies should operate within the strategic planning framework established in the **Environmental Planning and Assessment Act 1979**. Its consideration should be an early and mandatory component of the strategic growth and infrastructure planning undertaken by State agencies and local councils* (p 44)

Section 5 (g) of the new *EP&A Act* includes an objective “to promote good design and amenity of the built environment”. *Greener Places* makes numerous references to ‘design’ and this is articulated in 2.1: “*Greener Places* proposes a design approach for urban environments that promotes nature as a driver, resulting in high performing, quality design.” (p 31) In order to afford *Greener Places* greater legislative weight, there should be an explicit reference in *Greener Places* that the policy is an articulation of ‘good design’ envisaged in the s 5(g) objective of the *EP&A Act*. For example, wording could be:

“*Greener Places* articulates the principles and elements of ‘good design’ for the purposes of achieving section 5(g) of the *Environmental Planning and Assessment Act 1979*.”

In this regard, section 1.7 ‘How to use *Greener Places*’ (p 26) should be re-articulated to make it mandatory for planners and decision makers to refer to *Greener Places* when undertaking strategic planning and development assessment.

Elements

The elements provided as examples of ‘green infrastructure’ are well articulated and supported in healthy planning literature. We particularly support the inclusion of walkways, cycleways and public transport as elements of green infrastructure (pp 12, 16, 19, 33, 40).

We note the example of element 3 on p 12 (particularly the image) – “Squares and plazas including both public and private courtyards and forecourts” – and would caution that such an element by itself shouldn’t be regarded as green infrastructure in the absence of natural elements such as water, trees or gardens. (In this sense the image of a water feature strengthens the case for squares or plazas being ‘green

infrastructure’.) Although squares and plazas have the potential to include ‘semi-natural’ sub-elements (like water foundations) it would be unfortunate if planners or developers interpreted this lower-order ‘green infrastructure’ as satisfying the intent of the policy. This is particularly important for high density urban areas or infill development where competition for green vs grey space can be hotly contested. We are very supportive of the examples provided overall and feel that the Government Architect NSW has done an excellent job of articulating the elements of green infrastructure.

Justification

We strongly support the justification for needing green infrastructure articulated in section 1.2. The importance of green infrastructure for health and to mitigate against the impacts of climate change are well researched and supported. The recognition of changing population demographics is particularly relevant to Northern NSW where an aging population and high social disadvantage means there is often the expectation for more passive recreation options, improved walkability and free access to green spaces.

Principles

We strongly support the principles of green infrastructure articulated in section 2.1 of the policy, and observe that they have some similarity to the four guiding principles of equity, early engagement, interdependence and building partnerships found in NSW Health’s *Healthy Urban Development Checklist*.⁴

Funding

As identified by section 3.5, funding is crucial to the implementation of the *Greener Places* policy. An unfunded or underfunded policy risks a lost opportunity for preventative health measures that would assist in reducing reliance on crisis healthcare infrastructure. We note the intention for the Department to conduct an audit of all existing funding programs (p 50) and we support embedding Green infrastructure as essential infrastructure in the NSW Strategic Planning Framework (p 50). We submit that the provision of green infrastructure should not be reliant on ad hoc grants but be part of a strategic, recurrent and long term funding plan that improves and maintains green infrastructure in perpetuity.

Yours sincerely,



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⁴ <http://www.health.nsw.gov.au/urbanhealth/Pages/healthy-urban-dev-check.aspx>, pp 13-16