

31 October 2018

NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

Re: Draft Urban Design Guide for Regional NSW: A guide for creating healthy built environments in regional NSW: Submission from the NSW Skin Cancer Prevention Strategy - Shade Working Group

Thank you for the opportunity to provide feedback on the *Draft Urban Design for Regional NSW: A Guide for creating healthy built environments in regional NSW* (the Draft Guide).

The NSW Skin Cancer Prevention Strategy Shade Working Group (the Group), operating within the auspices of the NSW Skin Cancer Prevention Strategy (Cancer Institute NSW, 2017), would like to commend you for the inclusion of shade as a design consideration for a healthy built environment in the Draft Guide, and have several suggestions to ensure the benefits of shade are fully recognised in the document.

In summary, we commend the inclusion of shade in the Draft Guide but would like to see the following additions:

- A recognition of the benefits of shade in assisting to reduce exposure to UV radiation and therefore assisting in preventing skin cancers
- The recognition of the co-benefits of shade
- Illustrated case studies of good quality shade provision
- Reference to the Cancer Council NSW 2013 *Shade Guidelines*

Our response

1. Skin cancer – high incidence and need for action.
Australia has among the highest incidence of skin cancer in the world with approximately 750,000 treatments for skin cancer undertaken every year (Fransen et al, 2012). Two in three people who grow up in Australia will be diagnosed with some form of skin cancer before the age of 70 (Staples et al, 2006). UV radiation is responsible for over 95% of skin cancers in Australia, and in NSW, UV levels are high

enough to damage unprotected skin for at least 10 months of the year. The good news is that skin cancer is highly preventable: and practicing five forms of sun protection, including seeking out shade, are the best ways to protect yourself from the sun.

2. The role of shade in good UV protection

Good quality, effective and well-designed shade provides protection from diffuse ultra-violet (UV) radiation (reflected from surfaces such as sand, water and cement) as well as direct UV from above, and creates an outdoor space that is comfortable to use all year round (Cancer Council NSW, 2013).

Protection from UV radiation through the provision of UV resistant shade sources is vital in public places. This is especially important between 11am and 3pm during the summer months when UV is particularly damaging to exposed skin. Across NSW, UV levels are 3 or higher for at least 10 months of the year. This is a significant natural hazard which could be articulated in the Draft Guide. During the summer months, UV hits extreme levels (11+), making sun protection even more important.

Used in conjunction with the other recommended protective measures such as broad-brimmed hats, clothing and sunscreen, shade can provide maximum sun protection from the damaging effects of UV radiation.

The Group notes that the inclusion of shade in the Draft Guide currently relates to the improvement of *thermal comfort* as part of 'Responding to Climate Impacts' (P. 40 then reiterated in each of the subsequent settings chapters e.g. P 47) and could be enhanced to include *protection from UV* which is a Group 1 carcinogen that causes 95% of melanoma skin cancer and 99% of non-melanoma skin cancers (Armstrong & Krickler, 1993; IARC, 2012).

This represents a significant risk for people living and working in regional urban environments. Compared with major cities, people living in regional and remote areas of Australia are more likely to die from melanoma skin cancer (AIHW, 2017).

We would also like to see the recognition of the co-benefits of shade, which depending on the type of shade provided, include the benefits of thermal comfort, visual/aesthetic, rain shelter, micro-climate thermal cooling, reduction of evaporation, reduction in soil erosion, biodiversity benefits and reduction of atmospheric carbon.

The 2013/14 Cancer Council summer National Sun Protection Survey found that more than half (57%) of adults reported that there was no shade available at the location of their main outdoor activity in a public park or garden (70%), and sports

centre or grounds (62%) (Cancer Council Victoria, 2014). We know that when shade is available, people use it. (Buller et al. 2017)

Prevention involves reducing UV exposure by structuring environments to support sun safety (e.g., providing good quality and properly designed shade and altering outdoor event schedules to avoid peak UV hours) as well as promoting personal protection (i.e., limiting time in the sun and wearing protective clothing and broad-spectrum 30+ sunscreens).

Your assistance with promoting shade provision as a critical component of the built environment in the Draft Guide would assist with delivering the [NSW Skin Cancer Prevention Strategy \(www.cancer.nsw.gov.au/nsw-skin-cancer-strategy\)](http://www.cancer.nsw.gov.au/nsw-skin-cancer-strategy).

We also urge you to include more photos with short case studies of examples of good quality shade provision - both natural and built - in the final document.

The Group can assist with provision of shade case study examples and a definition of good quality shade and UV radiation for the Glossary.

The Group recommends that The Draft Guide and associated technical documents reference the Cancer Council NSW 2013 *Guidelines to Shade* (details at the end of this submission). The *Guidelines to Shade* provide invaluable assistance to all professionals involved in the design of both public and private spaces.

The NSW Skin Cancer Prevention Strategy Shade Working Group offers ongoing support throughout development of the *Draft Guide* and related guidance documents.

For further information or to discuss the NSW Skin Cancer Prevention program, please contact Kate Reakes, Cancer Prevention Manager on 02 8374 5600 or Kate.Reakes@health.nsw.gov.au.

Kind regards,

Professor David Currow
Chief Cancer Officer and Chief Executive Officer
On behalf of the NSW Skin Cancer Prevention Shade Working Group

NSW Skin Cancer Prevention Shade Working Group membership:

Liz King, Cancer Council NSW (Chair)
Cancer Institute NSW

Professor Susan Thompson, University of New South Wales City Future Research Centre
Jan Fallding, Consultant Strategic and Social Impact Planner, Hunter Valley (Registered Planner)

References:

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