

30<sup>th</sup> June 2011

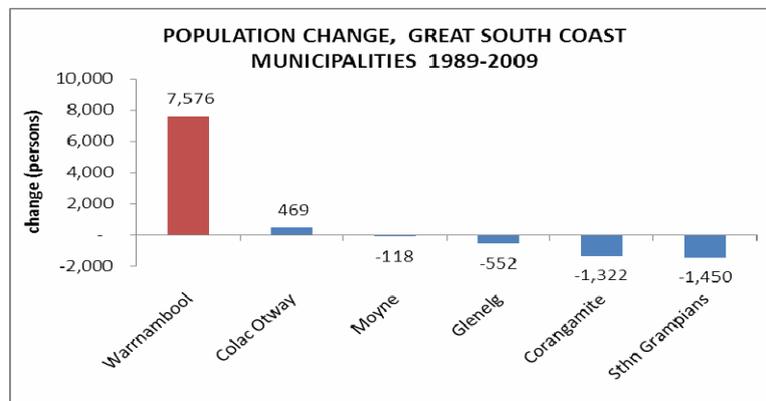
The Secretary  
Environment and Planning Committee  
Legislative Council  
Parliament House  
Spring Street  
Melbourne VIC 3002

Dear Sir,

**Re: Inquiry into Environmental Design and Public Health in Victoria**

Thank you for the opportunity to provide a submission to this inquiry. Due to the timeframes for submission this paper represents the views of the officers of Warrnambool City Council not those of the elected Council. We believe that our experience in trying to address the impacts of population growth, economic growth and growing health and social issues at a local government level puts us in a strong position to make comments to this inquiry. The following learnings drawn from our work highlight some of the issues that should be considered in looking at the relationship between environmental design and public health and their application.

Warrnambool is a growing city. We currently have over 34,000 residents (June 2010) and have had an average annual growth rate of 1.8% (574 persons each year) over the last 5 years. The City's growth is higher than the regional Victorian average, and Warrnambool is the only LGA in the south west which is experiencing significant growth. Warrnambool is forecast to attract approximately 60% of the region's growth over the next 15 years.



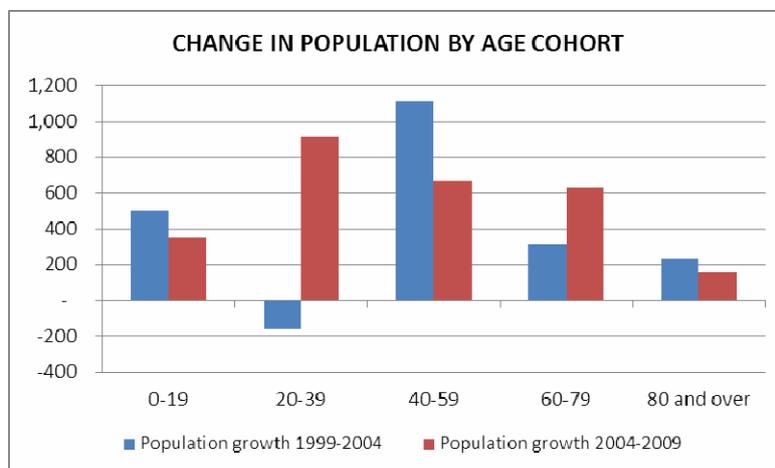
Warrnambool has grown at a pace where residential land and industrial land are in critical supply. Structure planning for Warrnambool’s growth areas is underway to provide an additional stock of at least 5,000 lots to accommodate an expected 15,000 new residents by 2030.

This expansion relies on Greenfield development (extension of the urban area rather than a consolidation model). There are concerns that this may compound and exacerbate public health issues which occur due to continuing reliance on private vehicles however there appears to be no other viable alternative. Whilst Council has developed and is implementing a Sustainable Transport Strategy and an Open Space Strategy the tensions for growth far outweigh the capacity of Council to implement alternate approaches.

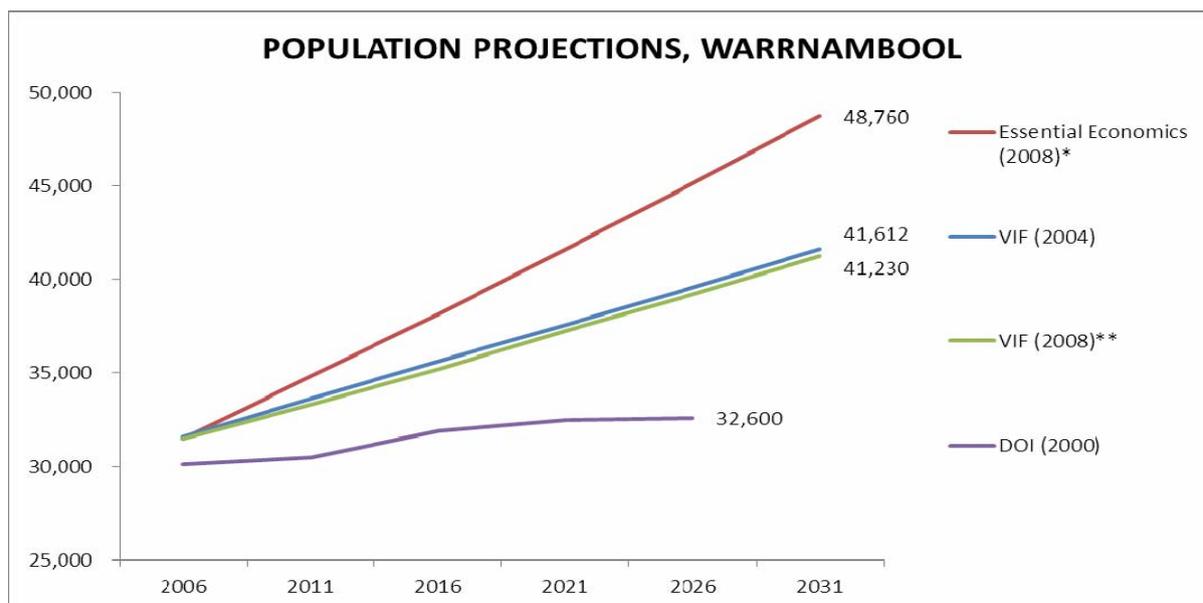
Warrnambool’s growth over the next 15 years is conservatively planned at 10 dwellings per hectare. Local research suggests that a minimum of 10 dwellings per hectare is required to contain Warrnambool’s growth to the existing urban growth boundary in the next 2 decades.

International research suggests that minimum densities of 26 dwellings/hectare are necessary to support walkable activity centres – about double current minimum standards in Victoria – and these densities can easily be achieved without high rises (McPherson and Haddow 2011) however there is resistance from the community (and therefore from developers) to plan for high densities. The tension for change to increase density is not experienced to the same degree in rural and regional Victoria as is experienced in metropolitan Melbourne perhaps due to the still relatively short distances from activity centres to urban boundaries.

Since 2004, the largest source of population growth has come from the 20-39 age cohort, with people choosing to grow their careers and families in Warrnambool.



As adopted government population forecasts show growth of only 1% per annum (vs the actual 1.8% experienced in the five years since 2006), Warrnambool has a significant challenge to have issues recognized which arise from this relatively rapid growth, a recent example being the planning for a new primary school in the growth area North of the Merri River (see Attachment 1).



Source: DOI, DPCD, Essential Economics Report for Regional Cities Victoria

\* Essential Economics Projections based on the scenario of Regional Victoria increasing its share of population growth to reach 25% by 2026.

\*\* VIF2008 Projection from 2026-2031 based on the VIF2008 average annual growth rate of 1.0% per annum for Warrnambool.

Unlike many other regional and rural centres, Warrnambool has low levels of unemployment (5.2% as at December Quarter 2010) and in some sectors workforce shortages. Contrasting with this the City also experiences the following social and health issues:

- High rates of child abuse and family violence
- High rates of mental ill-health
- High rates of alcohol abuse and use of tobacco
- High rates of obesity

Evidence from the public health area tells us that many of these issues are consistent with a growing social gradient. Whilst there is economic growth, Warrnambool does have significant areas of socio-economic disadvantage which may be compounded over time by low rates of Year 12 completion and take up of university places. We are aware of recent overseas evidence that suggests that rapid economic growth as compared with incremental growth may exacerbate this problem even further.

## Planning

### *Council Planning Framework*

As part of meeting the requirements of the Local Government Act, Councils are required to develop a four year Council Plan to guide their work. This is the major strategic policy document for Council and is supported by a four year Strategic Resources Plan. The other legislated plans include the Municipal Public Health Plan (MPHP) and the Municipal Strategic Statement (MSS). Whilst the requirements of the MPHP were reviewed and updated through legislation in 2008, this plan, once developed, has little power in ensuring action for health and wellbeing at the local level except through the goodwill of Council. Alternately, the MSS has significant power as the guiding policy document for urban planning

and once signed off by the Minister is used as a tool for decision making both at a local level by statutory planners and if necessary in the Victorian Civil and Administrative Tribunal. Whilst it is possible to include policy around community health and wellbeing in an MSS, the need to do this has only recently been recognized and will take significant time to achieve given the steps in the process. There is also a need to identify what is good practice in making these amendments so the policy outcomes that Council want to achieve are achieved and challenges withstand the scrutiny of the planning system. Alternately the MSS could have the MPHP and Council policies as Reference documents. This would allow approaches focusing on health and wellbeing to remain contemporary.

#### *Health and Wellbeing Capacity*

It has only been in the last twelve months that Warrnambool Council has been able to resource some internal capacity for health and social planning. The absence of this competence is not uncommon for rural and regional councils whose rate bases preclude funding such positions. Without this internal knowledge it is not surprising that Councils struggle in developing a health and wellbeing agenda, especially when it comes to environmental design.

Once resourcing has been established there is a need for external support and best practice publications and guidelines in areas such as health and social impact assessment, along with good access to relevant socio-demographic data. It has been our experience that the latter has come from the Department of Health, Department of Education and Early Childhood Development and the Department of Planning and Community Development but no clear guidance is available for the former.

#### *Integration*

There is a lack of knowledge of different stakeholders from both inside and outside Council about the relationships between environmental design and public health, and the systems that underpin these fields. Even within Councils there is a knowledge gap between health / social planners and land use planners whilst in the public health field there is a lack of knowledge about environmental design. At Warrnambool City Council the size of our organization and the current culture will facilitate a breakdown of this gap over time however this approach may not work in a larger organization or one where the culture is not supportive. Therefore we believe that government policy and legislation should facilitate closer working relationships in the planning process through such vehicles as requirement for health impact assessment.

A high functioning local government takes a 'whole of government' approach to its work using such approaches as the Environments for Health Framework. Local government also can play a stronger role in facilitating 'place making' by bringing together the efforts of other stakeholders including relevant State government departments such as Health, Education, Transport, and Human Service etc...to help create more coordinated and potentially more efficient solutions for the community e.g. joint use community facilities. Just as the introduction of new State government legislation requires sign off by all government departments using a business/risk impact assessment; significant urban structure plans should also have evidence of input from relevant State government departments so opportunities are not missed. There is a need to improve the alignment of decision making and early investment when planning and establishing new growth areas e.g. set public transport routes, schools etc..

## **Application**

### *Growth Area Planning*

As discussed above and demonstrated in Attachment 1, Warrnambool is at various stages in the planning process with regard to release of over 5,000 housing lots and 64 hectares of employment land. In developing costings for Development Contribution Plans, Council uses recognised benchmarks however information is limited when trying to build in contributions for infrastructure that would support community health and wellbeing. We believe that in addition to development of these benchmarks there needs to be other ways to influence developers to create more liveable communities that impact on community health and wellbeing through a combination of legislation, taxation, education and external recognition / awards. The planned national Taxation Summit later this year provides the State with an opportunity to advocate for some of these changes.

There is also a need to build in incentives for developers to take up innovation. In the Warrnambool area there has been significant work being undertaken by Wannon Water on rain water harvesting in new growth areas. However there is no incentive for the developer to connect and home owners, in some cases, see the change as taking water away from their gardens. As a result, connections are not going ahead and the effort and investment is wasted.

There is also a need to review current zoning requirements to assess their capacity to promote health and wellbeing outcomes e.g. types of businesses allowed in residential zones. These approaches may work to limit access to alcohol and promote food security through encouraging access to affordable healthy food.

We know that good practice environmental design can facilitate social connection, creating environments that are safe, accessible and comfortable, have access to open space and required amenities that are within reasonable walking distance or accessible via regular and accessible public transport. We need legislation and regulation that requires this approach.

At the building design level we have seen the compliance with five star energy rating and Disability Standards by the sector and would encourage a similar approach to encourage ageing in place. We would also encourage incentives for development of mixed housing rather than the standard 3 bedroom house approach we see in the Warrnambool growth corridors. For commercial development we would encourage incentives for the creation of affordable space for community connection / activity e.g. meeting rooms, community facilities, one that promotes mixed retail that delivers opportunities for physical activity, access to affordable healthy food, encourages walkability and provides good public transport access.

### *Housing affordability*

Housing affordability is a growing problem for the community of Warrnambool, especially with regard to accessing rental accommodation. Whilst this problem is largely due to the economic prosperity of the region, it compounds existing health and social issues as it affects people with low incomes, students and the aged.

The timelines required for land release, along with a lack of community tolerance for high density development, and therefore a lower return on investment for developers make it difficult for Council to address this issue. Levers within the planning legislation would make it easier for Council to drive cultural change within the community.

#### *Transport access*

As discussed, Council has developed a Sustainable Transport Strategy that promotes walking and cycling in addition to use of public transport, however implementation is largely dependent on receipt of external grants. Council has had a strategy of building linking footpaths in established areas to promote walking using a shared funding approach through Special Charge Schemes however this has caused significant community discontent from those required to contribute to the schemes.

Currently the focus of the local bus providers is on delivering children to and from school with minimal public transport available to the general public until after 9.00am. This limits opportunities for employment and access to services for people without a private vehicle.

#### *Gaming*

Warrnambool has high levels of gaming losses per electronic gaming machine (\$765 / adult 2009/10) when compared with the Victorian average (\$611/adult 2009/10). These losses are compounded by higher than average numbers of electronic gaming machines at 9.36 per adult, approximately 30% more than the state average of 6.28 per adult. Currently Warrnambool has a cap on gaming machines of 234 however this is due for review in 2011. A total of 270 electronic gaming machine entitlements were purchased in the Warrnambool City and Moyne Shire local government areas during the auction process in 2010.

In May this year Council received an application to install and use nineteen (19) electronic gaming machines and to construct and carry out buildings and works associated with a redevelopment of a local existing hotel. At the same time an application was made to the Victorian Commission for Gaming Regulation (VCGR) to operate the machines. Under the current regulatory framework, two separate permissions are required in order to operate electronic gaming machines at a premise:

- planning permission under the *Planning and Environment Act 1987*, for which Council is the responsible authority; and
- permission from the Victorian Commission for Gaming Regulation (VCGR).

Due to the evidence around health and social impact of electronic gaming Council has commissioned an independent social impact assessment along with a survey of local residents' attitudes. Currently the costs of this work, along with additional costs that will be required to represent Council at the VCGR are running at over \$80,000. This is an excessive cost to properly assess the impact of the application where decision making criteria are less than clear and there is an imbalance between resources of Council and those of the proponents. It may be that on balance Council determines not to challenge the application, despite the evidence of negative impacts on community health and wellbeing. This is an area where legislation and regulation could be simplified, and decision making made more transparent.

## *Alcohol*

As the City is growing the Council is receiving more applications for liquor licensing of new premises. Whilst it has power around planning applications, decision making criteria are open to interpretation. The definition of “amenity” is very subjective and therefore open to interpretation. Warrnambool would not like to end up like some area of Melbourne where density of alcohol outlets far outweighs density of outlets for nutritious food.

### **Summary and Recommendations**

In summary we would make the following statements and recommendations:

- There is strong evidence to support a link between environmental design and health
- There needs to be stronger links between the Municipal Public Health Plan and the Municipal Strategic Statement
- Health and wellbeing outcomes need to be more overtly incorporated into planning legislation at a State and local policy level
- Assessment of the health impacts of proposals and projects need to be considered in the same way and with the same importance that economic and environmental impacts are required to be scrutinised
- Best practice guidelines need to be developed to inform health and social impact assessment and community facility development requirements
- Requirements need to be built into legislation and regulations to facilitate integration of planning and health outcomes at a community and state government level
- Incentives need to be developed to encourage developers to engage with the community health and wellbeing agenda
- More research needs to be supported in developing practical guidance for State and local government in addressing new and emerging health and wellbeing issues such as food security, housing affordability etc...
- Funding for planning needs to consider requirements for social planning as well as other forms of planning whether provided directly or through increases in planning application fees especially for rural and regional Councils with lower rates bases

It is our understanding that running concurrently with this inquiry is the review of the operation of the Victorian Planning Provisions and planning schemes by the Ministerial Advisory Committee. We would strongly encourage that findings from this inquiry inform their work.

Warrnambool City Council officers welcome the opportunity to comment on the potential contribution of environmental design to prevention and public health in Victoria. We would also extend an invitation to Members of the Environment and Planning References Committee to visit Warrnambool where we would be delighted to discuss these issues in further detail.

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<sup>i</sup>Fodor& Associates LLC. Relationship between Growth and Prosperity in 100 Largest U.S. Metropolitan Areas. 2010.  
[www.FodorandAssociates.com](http://www.FodorandAssociates.com)