

**Submission to the Greater Sydney Commission on  
the draft District Plans**

31 March 2017

Right to Food Coalition  
12 Charlotte St  
Lilyfield 2014

## Executive Summary

The Right to Food Coalition (RTFC) was formed in 2015 to advocate for food security for all Australians and includes organisations, practitioners, researchers and community workers working to address food injustice.

Food security describes people's 'physical, social, and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life' (World Summit on Food Security 2009). As such, it is a fundamental issue of equity.

The RTFC welcomes the opportunity to comment on the GWS District Plans. We support the concept of 3 interrelated spheres of Productivity, Liveability and Sustainability, and believe the food security and food access affect each of these spheres and are affected by them.

We are pleased to see that the District plans have acknowledged the importance of access to healthy food as part of the Liveability framework, and the importance of retaining peri-urban and urban agriculture, as part of the Productivity and Sustainability frameworks. However, we believe that each of these areas could focus more specifically, and with more identified strategies, on healthy food access.

We endorse the recommendation of the GSC Social Panel Advisory Group to 'develop an overarching LG planning policy framework that strengthens local planning control over the type, distribution and density of retail food outlets, to assist in ensuring a greater diversity and choice of food outlets, and to protect against the clustering of unhealthy food providers'.

We argue that food should be considered part of key infrastructure in any city, as has been recognised internationally through such initiatives as the *Milan Urban Food Policy Pact*.

It is well recognised that preventable 21C epidemics such as overweight, chronic disease and mental health will bring a heavy cost; individually, to the Health and welfare systems and with an additional impact on productivity. Planning for the vibrant and productive cities envisaged in the GWS plans must take very seriously the established role that the built environment can play in contributing to, or mitigating, these effects.

While the District plans address physical activity frequently and with many strategies, the same cannot be said for healthy food access – which may include: retail zoning to encourage provision of fresh foods; encouraging farmers' market and school and community gardens and maximising other opportunities for urban agriculture; retention and expansion of peri urban agriculture. Resilient cities of the future may need to rely on a proportion of food grown within city boundaries, particularly where there is good soil and reliable rainfall at a time of significant climate change.

Currently about 5% of the Australian population is 'food insecure', resulting in poorer food choices and access to poorer foods, and an association with higher rates of disease. Food access is an equity issue; the next 40 years of planned development offer an unparalleled opportunity to ensure that city development prioritises food access so that all Sydney residents can have equitable access to healthy fresh food.

## Introduction

The Right to Food Coalition (RTFC) was formed in 2015 to advocate for food security for all Australians. RTFC includes organisations, practitioners, researchers and community workers working to address food injustice.

Food security describes people's 'physical, social, and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life' (World Summit on Food Security 2009). (RTFC) understands food security as a capability that allows people to achieve healthy and productive lives..

### **Food security pertains to the objectives of the Greater Sydney Commission**

Food access and food security should be a key objective of the Greater Sydney Commission. The relevance of food security is elaborated for four of the Commission's objectives below:

#### *9(a) lead metropolitan planning for the Greater Sydney Region*

As a health capability, food security is central to the objectives of urban planning. In the Anglophone world, the genealogy of urban planning can be traced back to the public health legislation first enacted in Victorian England (Hall 2014: 19) and that was subsequently copied directly into New South Wales's body of law (Mayne 1982: 39–40). Born out of public health interventions, urban planning remains focussed on people's welfare more generally today, as set out in the objectives of the Environmental Planning and Assessment Act 1979 NSW.

Moreover, across the world, the emergence of translocal food policies, like the Milan Urban Food Policy Pact, and local metropolitan food policies, such as in London, Toronto, Baltimore, and Belo Horizonte<sup>1</sup>, and in Denmark demonstrates that food and food security are increasingly being drawn back into the purview of urban planning practice.

#### *9(c) promote the alignment of Government infrastructure decision-making with land use planning*

The food system is an infrastructure comparable to other infrastructures. In fact, several parts of the food system in New South Wales are already considered as government infrastructure: water, sewage, and food waste flows are all managed as distinct infrastructures. Historically these systems were metabolised sustainably in circular urban food systems (Brinkley and Vitiello 2014), and as will be suggested later, water, sewage, and municipal waste could in the future be reconsidered as part of a circular food system in order to secure city resilience.

In the same way that infectious disease warranted public investment in mains water, the spread of 'non-communicable' diet-related disease in today's food systems (Joint WHO/FAO Expert Consultation 2002: 5) may warrant government attention to food as a critical infrastructure.

---

<sup>1</sup> For the Milan Urban Food Policy Pact see (Milan Urban Food Policy Pact 2015); for Toronto see the Toronto Food Policy Council; for Baltimore (John Hopkins CLF 2015); and for Belo Horizonte (Rocha and Lessa 2009).

*9(f) support ongoing improvement in productivity, liveability and environmental quality*

In its Liveability Framework, the Commission already recognises the critical importance of health – including access to fresh food – as a capability. In this regard, the Commission already implicitly recognises the contribution of food security to a city's liveability. It is equally important to recognise the role that food security also plays in economic productivity<sup>2</sup>, and in addition to conceptualise food environments as an environmental quality in order to most effectively harness policy synergies.

*9(e) encourage development that is resilient*

Food is central to the resilience of social-ecological systems. Arup's city resilience framework (Arup 2015) conceives of four dimensions of city resilience, and food can be thought of as a link that mediates between health and wellbeing, and infrastructure and environment.

## Commendations and recommendations

There are several aspects of the District plans that the RTFC supports. We make note of our support, and include suggestions for further work, in the sections below.

### The Liveability framework

The RTFC commends the liveability framework that the Commission has developed, for including health issues throughout, and for recognising the importance of social infrastructure provision, including access to fresh seasonal food.

### *Addressing food and physical activity as two sides of the same metabolic coin*

However, the RTFC submits that the liveability framework needs to place more emphasis on food access in order to properly take its role in health into account. The current draft District Plans thematise both food security and physical activity as components of healthy built environments. However, the current drafts elaborate actions to enable physical activity to a far greater extent than for food access: physical activity is addressed in Liveability Priorities 5 and 6, whereas food is only addressed briefly in Liveability Priority 5. Food and physical activity share the same metabolic pathways involved in the pathogenesis of several non-communicable diseases (Joint WHO/FAO Expert Consultation 2002: 3) – but physical activity is a factor which can only modify outcomes that have already been defined by diet (Joint WHO/FAO Expert Consultation 2002: 30). As such, the RTFC submits that all district plans develop a Liveability Priority especially dedicated to food access, .

### *Grounding guidelines for food security in existing best practice*

To implement Action L13, the RTFC recommends that guidelines for safe and healthy built environments be developed in line with international standards for food policy. Two standards in particular apply to the NSW context: The *Milan Urban Food Policy Pact*, a global benchmark for urban food policy agendas and actions; and *Food-sensitive planning and urban design (FSPUD)*, a conceptual framework produced by the Heart Foundation in collaboration with the Victorian Eco Innovation Lab and VicHealth (for reference to the framework see Donovan et al. 2011).

---

<sup>2</sup> for an example of the costs of obesity on productivity see (McKinsey Global Institute 2014).

Land use zoning and other environmental planning instruments for food security

*Co-location zoning for accessibility*

The RTFC commends the Commission's support for co-locating shops with complementary land uses in order to improve access by active transport to fresh, seasonal food across Sydney (Liveability Priority 6). However, the RTFC submits that Liveability Priority 6 must make specific reference to the co-location of fresh and healthy food retail outlets with complementary land uses, especially food retail which provides economically and culturally accessible food that is adequate for an active and healthy life. Connecting economic and cultural accessibility with geographic accessibility is critical, as mobility may be one of the greatest limitations on access to food in Australia (Coveney and O'Dwyer 2008). It is imperative to reiterate that co-location zoning must specifically address access to healthy food, in light of the evidence that many areas with lower SES status have higher rates of fast and takeaway food outlets.

*Co-location zoning for healthy built environments*

There is a considerable literature that elaborates on the impact that environmental factors have on individual's food choices.(FAO 2016; Hawkes et al. 2015; Herforth and Ahmed 2015; Rahmanian and Gasevic 2014; Izumi et al. 2011; Kamphuis et al. 2006; Popkin et al. 2005), and there is a widespread recognition that individual-scale interventions, such as nutritional education programs, can only effect limited change without corresponding environmental change (Joint WHO/FAO Expert Consultation 2002: 44). Food environments are therefore critical to the success of public health policy, and urban planning is well positioned to effect substantive change in this regard.

The RTFC recommends that the Greater Sydney Commission makes greater use of co-location zoning in order to build food environments for food security, as co-location zoning has the potential to shape the environments in which individuals make food choices.

*School area food environments: co-location zoning and advertising*

The RTFC submits that school food environments demand the highest priority for attention from the Greater Sydney Commission. Food environments are overwhelmingly designed to influence the food choices of children and young people (Joint WHO/FAO Expert Consultation 2002: 38), and their effectiveness is of concern (Joint WHO/FAO Expert Consultation 2002: 65). Moreover, diet-related non-communicable diseases and their risk factors track strongly from early through to later life stages (Joint WHO/FAO Expert Consultation 2002: 36–37). Thus, the school food environment is not only a site where serious and long-term damage to health can occur, but also a site where cost-effective interventions can be made. Local government, with the jurisdiction to regulate not only the co-location of land uses, but also advertising at large, is well positioned to intervene in these damaging environments. It is therefore important for the Greater Sydney Commission to develop specific guidelines for healthy school food environments and include them in each district plan.

*Food environments at large: preference formation, availability, and accessibility*

Other elements of the food environment have not been addressed in the draft district plans, and these require special attention from the Greater Sydney Commission. As mentioned above, local government is given explicit control over public advertising in

the *Environmental Planning and Assessment Act 1979 NSW*. The amount of money that food processing industries spend on advertising in public spaces suggests that this is an effective method to boost sales of processed foods (Joint WHO/FAO Expert Consultation 2002: 65). For this reason, guidelines to regulate the advertisement of nutrient-poor and pre-prepared foods ought to be developed and included in each district plan.

Beyond restricting the advertisement of nutrient-poor foods and pre-prepared foods, district plans should also include guidelines to restrict their availability and accessibility. The food options available to individuals have a considerable impact on their food choices; as such, risk factors for food insecurity ought to be excluded as far as possible. In the case of pre-prepared foods<sup>3</sup>, however, this needs to correspond carefully with the provision of foods that are accessible and acceptable for individuals to prepare at home. This not only includes restricting availability of and access to fast food and take-away food outlets, but also restricting availability of and access to other food retailers that line their shelves with similarly pre-prepared foods.

#### The Western Sydney Diabetes Prevention & Management Initiative

The RTFC commends the Commission's support for the Western Sydney Diabetes Prevention and Management Initiative in the draft West Central district plan. The Initiative acknowledges the role that the diabetogenic environment plays in the epidemiology of diabetes in Western Sydney. The Right to Food Coalition recommends that the work conducted on food environments in Western Sydney as part of the Initiative<sup>4</sup> be extended to all other districts of Sydney as well. The Commission must recognise the role of environmental factors in the pathogenesis of non-communicable disease in all of Sydney's districts.

#### Urban agriculture

The RTFC commends the Commission's support for urban agriculture, especially for recognising the social functions that urban agriculture can facilitate besides its primary function of food production. The RTFC encourages future policy to understand food not just as a physical materiality but also as a social practice.

#### *Fertilising public life by integrating land uses*

The Right to Food Coalition recommends making linkages between urban agriculture and open space policies, as urban agriculture provides the opportunity to diversify the uses of many of the extensive single-use open spaces that have been built in Sydney as part of city-functional planning programmes. Integrating urban agriculture into existing open spaces offers the opportunity to connect two health-promoting land use activities using the same urban infrastructure, in addition to enlivening public spaces at off-peak times, and thus making them safer and more accessible to use.

---

<sup>3</sup> Reduced time costs appear to play a considerable role in the excess food consumption leading to overweight (Cutler et al. 2003; Jabs and Devine 2006), and preparing meals inside the home is associated with a lower risk of developing type two diabetes (Zong et al. 2016) and a lower risk of overweight (Joint WHO/FAO Expert Consultation 2002: 67). Thus, the policy challenge stands to reduce the readiness of food.)

<sup>4</sup> Details of the food environment mapping conducted by Dr Astell-Burt and Dr Feng can be found at <https://www.westernsydneydiabetes.com.au/western-sydney/food-deserts-and-mapping>

## Peri-urban agriculture

The RTFC commends the Commission's position on protecting agricultural land in the Metropolitan Rural Area, stated in Sustainability Priorities 8 and 9. However, the Right to Food Coalition submits that the Greater Sydney Commission must take a more active role in not only protecting, but also supporting and extending Sydney's peri-urban agriculture.

### *Protecting peri-urban agriculture as an invaluable asset*

Peri-urban agriculture is essential for Sydney's food security in regards to supply, access, and resilience. Peri-urban agriculture may only take up 3.5 per cent of total agricultural land use in the five mainland states, but it conservatively accounts for 25 per cent of the gross value of all agricultural production in the same five states (Houston 2005 cited in Hughes et al. 2015: 9). Peri-urban agriculture can not therefore be considered a marginal land use – it is central to the life of the city and it contributes far more than landscape amenity values.

This highly valuable land use takes place on some of Sydney's most fertile land, which is used especially for the production of fresh, perishable produce. The uniqueness of the land and the uniqueness of the land *use* disqualify market systems from safely regulating it alone – it utilises and produces commodities that are not freely substitutable, as the logic of economics demands. Compounding this uniqueness, peri-urban agriculture is characterised by elements of path dependency, insofar as land that has been built upon can rarely be recovered as agricultural land. As such, peri-urban agriculture and the land that it takes place on can not be left to regulation by the market alone. Peri-urban agriculture is a unique, central agent in Sydney's food system, and its functions are not made redundant by any other actors. Sydney's food system does not have the resilience to respond to the loss of this land and this land use<sup>5</sup>. Protecting peri-urban agricultural land is vital for the resilience of Sydney's food system.

### *Supporting peri-urban agriculture: making connections between food security and resilience*

However, protecting peri-urban agricultural land will not be enough to secure the resilience of Sydney's food system – it will have to be actively supported and extended. The state of human and environmental health in Australia and across the world demands this. The overwhelming majority of Australians do not eat enough fresh fruit and almost no Australians eat enough fresh vegetables (ABS catalogue 4364.0.55.001 2015). This dietary pattern extends to a global scale as well (Joint WHO/FAO Expert Consultation 2002: 24). But diet is not the only issue here: global production of fresh fruits and vegetables is actually insufficient for the world's population (Siegel 2014). Compounding this, the price of fresh fruits and vegetables has been increasing for the last several decades (Wiggins and Keats 2015), and particularly in comparison with stable prices of non-nutritious foods. As the population of the world and of Sydney continues to grow, as climate change reduces the productivity of agricultural land west of the Great Dividing Range (Hughes et al. 2015), and if diet-related non-communicable disease continues to spread at current rates, the resilience of Sydney's food system, and the city at large, will be put under

---

<sup>5</sup> For an overview of how these qualities affect the resilience of complex adaptive systems, see (Biggs et al. 2012).

serious and chronic stress. For these reasons, Sydney's peri-urban agriculture land will need to be able to *expand* to contribute to the dietary needs of the current population, and of the future population, without continued price increases that will make fresh fruit and vegetables inaccessible to those who need them most. Fresh fruit and vegetables can reduce the risk can reduce the risk and reverse the pathology of several diet-related non-communicable diseases such as diabetes, cardiovascular disease, cancer (Joint WHO/FAO Expert Consultation 2002: 75, 81, 96), and Sydney's peri-urban agriculture is best placed to make this produce accessible to those who need it most.

## References

- Arup. (2015) *City Resilience Framework*. Available at <<http://www.cityresilienceindex.org>>.
- Australian Bureau of Statistics. (2015) Catalogue 4364.0.55.001. *National health survey: first results, 2014–15*.
- Biggs R, Schlüter M, Biggs D, et al. (2012) Toward Principles for Enhancing the Resilience of Ecosystem Services. *Annual Review of Environment and Resources* 37: 421-448.
- Bjarnason I, Ward K and Peters TJ. (1984) The leaky gut of alcoholism: possible route of entry for toxic compounds. *The Lancet* 323: 179–182.
- Brinkley C and Vitiello D. (2014) From farm to nuisance: animal agriculture and the rise of planning regulation. *Journal of Planning History* 13: 113–135.
- Coveney J and O'Dwyer LA. (2008) Effects of mobility and location on food access. *Health & Place* 15: 45–55.
- Cutler DM, Glaeser EL and Shapiro JM. (2003) Why Have Americans Become More Obese? *The Journal of Economic Perspectives* 17: 93-118.
- Donovan J, Larsen K and McWhinnie J-A. (2011) *Food-sensitive planning and urban design: a conceptual framework for achieving a sustainable and healthy food system*. Melbourne: National Heart Foundation of Australia (Victorian Division).
- Food and Agricultural Organization of the United Nations. (2016) Influencing food environments for healthy diets. Rome: Food and Agricultural Organization of the United Nations.
- Hall, P. (2014) *Cities of tomorrow: an intellectual history of urban planning and design since 1880*. Wiley. Chichester.
- Hawkes C, Smith TG, Jewell J, et al. (2015) Smart food policies for obesity prevention. *LANCET* 385: 2410-2421.
- Herforth A and Ahmed S. (2015) The food environment, its effects on dietary consumption, and potential for measurement within agriculture-nutrition interventions. *Food Security* 7: 505-520.
- Hughes L, Steffen W, Rice M, et al. (2015) *Feeding a hungry nation: climate change, food and farming in Australia*. Climate Council of Australia.
- Izumi BT, Zenk SN, Schulz AJ, et al. (2011) Associations between neighborhood availability and individual consumption of dark-green and orange vegetables among ethnically diverse adults in Detroit. *Journal of the American Dietetic Association* 111: 274–279.
- Jabs J and Devine CM. (2006) Time scarcity and food choices: An overview. *Appetite* 47: 196-204.
- John Hopkins Center for a Livable Future. (2015) *Mapping Baltimore City's food environment: 2015 report*.
- Joint World Health Organization and Food and Agricultural Organization Expert Consultation on Diet Nutrition and the Prevention of Chronic Diseases. (2002) Diet,

nutrition, and the prevention of chronic diseases: a report of a joint WHO/FAO expert consultation. *WHO technical report series*.

Kamphuis CBM, Giskes K, de Bruijn GJ, et al. (2006) Environmental determinants of fruit and vegetable consumption among adults: a systematic review. *British Journal of Nutrition* 96: 620–635.

Lee JH, Ralston RA and Truby H. (2011) Influence of food cost on diet quality and risk factors for chronic disease: a systematic review. *Nutrition & Dietetics* 68: 248-261.

Mayne AJC. (1982) *Fever, squalor and vice: sanitation and social policy in Victorian Sydney*. University of Queensland Press. St. Lucia.

McKinsey Global Institute. (2014) *Overcoming obesity: an initial economic analysis*.

Popkin BM, Duffey K and Gordon-Larsen P. (2005) Environmental influences on food choice, physical activity and energy balance. *Physiology & Behavior* 86: 603-613.

Rahmanian E and Gasevic D. (2014) The association between the built environment and dietary intake - a systematic review. *Asia Pacific Journal of Clinical Nutrition* 23: 183-196.

Rocha C and Lessa I. (2009) Urban governance for food security: the alternative food system in Belo Horizonte, Brazil. *International Planning Studies* 14: 389–400.

Siegel KR, Ali MK, Srinivasiah A, et al. (2014) Do we produce enough fruits and vegetables to meet global health needs? *PLoS ONE* 9: e104059.

Wiggins S and Keats S. (2015) *The rising cost of a healthy diet: changing relative prices of foods in high-income and emerging economies*. London: Overseas Development Institute.

World Summit on Food Security. (2009) *Declaration of the World Summit on Food Security*. Rome: Food and Agricultural Organization of the United Nations.

Zong G, Eisenberg DM, Hu FB, et al. (2016) Consumption of meals prepared at home and risk of type 2 diabetes: an analysis of two prospective cohort studies. *PLoS Medicine* 13: e1002052.