

# Submission on proposed amendments to **SEPP 65** and draft *Apartment Design Code*



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**The Heart Foundation** is a not-for-profit organisation committed to improving cardiovascular health in Australia. The Heart Foundation's vision is for Australians to have the best cardiovascular health in the world. Through its research, health promotion programs and policy development, the Heart Foundation promotes healthy public policy to support better health for all Australians.

Cardiovascular disease (CVD) is the term used for a group of diseases including heart disease, stroke and blood vessel disease. It affects more than 3.3 million Australians and is one of Australia's leading causes of death – more than 47,000 Australians die each year because of cardiovascular disease. The biggest contributors to poor heart health are health behaviours, especially smoking, poor nutrition, insufficient physical activity and overweight/obesity. Addressing these lifestyle related factors can reduce CVD mortality risk by 66%<sup>1</sup>

## **Introduction:**

The Heart Foundation commends the NSW Government's intention to improve apartment design and affordability through changes to the *State Environmental Planning Policy No.65 Design Quality of Residential Flat Buildings* (SEPP 65) and the new *Apartment Design Guide*.

We believe planning policy and design codes can reinforce the need to place people at the centre of urban planning decisions. Health and well being considerations are integral to the decision making processes of urban planning to protect and promote liveability in increasingly challenged residential environments.

## **Health impact of urban and building design**

The health impact of insufficient physical activity is dual – it contributes to obesity and is a risk factor in itself. Australian guidelines recommend a minimum of 150 minutes of moderate level physical activity per week<sup>2</sup>. However higher levels of physical activity provide increased health benefits and high levels may be needed for people who want to lose weight. Physical activity is not just formal exercise or recreational sport. Most people can meet their basic physical activity needs by increasing the every day, incidental activity they do, such as adding a short walking component to their trips to and from work or school.

The Heart Foundation believes that increasing physical activity is not simply an issue of promoting activity to individuals. Health behaviours are strongly influenced by the environments in which people live. Physical and social environments which discourage walking, cycling or using public transport are associated with poor cardiovascular health indicators. Our recently updated policy document “*Blueprint for an Active Australia*”<sup>3</sup> highlights built environments and active travel as 2 of the 13 action areas which require immediate attention to increase Australians’ physical activity.

*Blueprint for an Active Australia* is available on the Heart Foundation website:  
<http://www.heartfoundation.org.au/SiteCollectionDocuments/Blueprint-for-an-active-Australia-Second-edition.pdf>

A recent comprehensive review by the NSW Healthy Built Environments Program<sup>4</sup> examined three domains influenced by built environment:

- Getting people active,
- Connecting and strengthening communities, and
- Providing healthy food options.

The conclusion from this review (and other evidence) is that built environments directly influence health and wellbeing. Car dominated transport; reduced opportunities for exercise and incidental physical activity, lack of local fresh food production, increased fast-food availability and lack of social connection are all factors that can be reversed by better planning of our cities and towns.

The role of the built and natural environments in influencing healthy behaviours is widely acknowledged in the literature from a range of disciplines, including public health, health promotion, urban studies and planning and transport planning<sup>5</sup>. For example, evidence summarised in the Heart Foundation’s *Position Statement on the Built Environment and Walking*<sup>6</sup> indicates that walking is associated with:

- Proximity of destinations, such as shops and public transport
- Mixed use planning
- Higher population density
- Street connectivity and design
- Pedestrian Infrastructure (linking key destinations)
- Neighbourhood aesthetics, including access to public open space.

The siting and design of apartment buildings also makes an essential contribution to healthy urban design, with the capacity to be an enabler for people being more physically active. We support the inclusion of design quality principles (Schedule 1 of the proposed amendments) which require consideration of broader issues such as context and neighbourhood character in apartment design decisions.

## **Comments on amendments to *SEPP 65* and the draft *Apartment Design Code*.**

Overall, the Heart Foundation supports the premise of *SEPP 65* and the proposed *Apartment Design Guide* in promoting better apartment design across NSW and ensuring minimum apartment sizes. Comment is provided on selected issues, in line with our expertise and interest in health and planning.

### **1. Proposed amendment to the car parking standard in the new *Apartment Design Guide***

*(Adding a car parking standard to the design guide that removes or reduces car parking requirements where there is good access to public transport and there is market demand to do so).*

The Heart Foundation is supportive of policy that will encourage more active travel (walking, cycling and public transport use) and less time spent in cars. In principle, reducing car parking requirements, where there is good access to frequent public transport and there is market demand to do so, is one of a number of variables that can work together with other factors to encourage more walking, cycling and public transport use. It is critical however that parking restriction is not applied in isolation of other supportive factors that facilitate more use of active travel modes. We advocate consideration of the following:

- Inclusion of a requirement that Developers provide justification where they are not providing car parking, on sites that have no minimum requirement, to ensure that viable active travel alternatives are available. The presence of a train station may not guarantee a service of sufficient frequency and acceptability to compete with car use.
- Uncoupling the purchase of parking from the purchase of the apartment, so that housing affordability is increased for those who do not require car parking and choose to use alternatives, such as walking, cycling, public transport and/or car share.
- We strongly support the provision of undercover secure bicycle parking in the development.
- On sites that have no minimum parking requirement, we advocate that provision of car share spaces (3J-1) is accompanied by Developer provision of car share membership options (for a nominal period), where a scheme operates locally.
- Given the cost savings to Developers where no minimum car parking is provided, contributions could be levied for supporting improved connections to public transport to encourage its use, including for example: footpath maintenance, wayfinding signage, lighting, shelter etc and/or associated behaviour change initiatives.

A further issue for consideration is how this amendment will impact on sectors of the community that require use of a vehicle for health or medical reasons, such as those with disabilities or mobility impairment. Population diversity should be encouraged, so we suggest minimum provision of disabled parking access is maintained regardless of the location of the

development. This would complement the intent of the Universal Design section 4G in the *Apartment Design Guide*, which aims to accommodate the changing needs of residents.

We also recommend consideration of a mechanism to cover any future demand for car parking, if removing the provision does not translate to more active travel use, but instead results in private vehicles being parked in the surrounding streets (subject to Council restrictions on resident parking).

## **2. Design Quality Principles in Schedule 1.**

We note Principle 3: Density in the proposed Schedule 1: Design quality principles. The Heart Foundation's recent paper on urban density - *Does Density Matter? The role of density in creating walkable neighbourhoods*<sup>7</sup> - is a discussion paper for residents, professionals and experts involved in planning and developing neighbourhoods. It highlights that higher density neighbourhoods that are well designed and suitably located with added amenity are desirable and add value to our communities.

The paper highlights parking policy as one of seven factors that work together to encourage more walking. While it makes the point that proximity to public transport is important, service frequency and acceptability is also essential in order to encourage use of public transport over car use.

The other factors considered critical to successful increased density relate to issues which should be considered under Principle 1: Context and Neighbourhood Character. These include:

- diversity of land use to allow for development of walkable destinations such as shops, recreation facilities, etc ;
- neighbourhood design, such as street connectivity, which makes walking a practical option;
- walkable distance to public transport and other important destinations such as shops, measured as people walk rather than 'as the crow flies'; and
- placemaking – making streets inviting places where people want to spend time rather than hurry through.

*Does density matter?* is available on: [www.heartfoundation.org.au/density](http://www.heartfoundation.org.au/density)

We note Principle 8: Housing Diversity and Social Interaction includes providing housing choice for different demographics. This issue is addressed in a literature review the Heart Foundation commissioned in 2012 titled: *Increasing density in Australia: maximising the health benefits and minimising harm*<sup>8</sup>.

The review addressed the impact of higher density on a range of health outcomes and across the life course including physical activity, cardiovascular and cancer mortality, road traffic mortality, respiratory health and mental health.

The findings suggest that to optimise density and health outcomes there should be a focus on three main constructs:

- building factors (its location, construction, design and maintenance)
- social, cultural and socioeconomic factors
- neighbourhood environment factors.

Of particular relevance to SEPP 65, the review suggests it is optimal to locate higher density housing such as apartments within easy access of shops, services, public transport and a hierarchy of public open space, but away from roads with heavy traffic, as well as designing balconies so they do not overlook roads with heavy traffic. This will require careful site selection, plus adequate building set backs and other mitigating design features. We recommend that performance criteria 4T-1 (*The siting and layout of buildings minimise the impacts of external noise and pollution*) be strengthened in this regard. A specific design solution under 'acceptable solutions' should include adequate building setbacks to protect residents from noise and air pollution. We note the current list of acceptable solutions (4T-1 on pg. 121) focus on noise, but only the last three dot points include reference to air pollution.

The Heart Foundation review also suggests there is a preference and desirability for families in apartments to live on the lower floors of lower rise development. Co-locating families on the same levels will require sufficient three bedroom apartments in the mix of available options. Well surveilled open space areas are also required within apartment complexes for parents with children.

### **3. Pedestrian Access and Entries**

Well designed, well lit and prominent stairwells create an opportunity for everyday incidental physical activity for residents, especially in lower rise apartments. We recommend development of additional performance criteria under section 3G that define acceptable solutions for effective stairwell location and design to promote prominent, safe and pleasant stair use using best practice design principles.

### **4. Links to relevant Heart Foundation Resources**

The Heart Foundation in partnership with urban planners, local government and other stakeholders, has developed a range of evidence based resources to facilitate healthier urban planning and design. These are available at:

<http://www.heartfoundation.org.au/active-living/healthy-built-environments>

#### **Attachments:**

- 1. *Blueprint for an active Australia***
- 2. *Does Density Matter? The role of density in creating walkable neighbourhoods***
- 3. *Increasing density in Australia: maximising the health benefits and minimising harm***

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- <sup>1</sup> Loefer M, Walach H. The combined effects of healthy lifestyle behaviours on all cause mortality: A systematic review and meta-analysis. *Preventative Medicine* 2012; 55:163-170
- <sup>2</sup> Australian Department of Health. Australia's Physical Activity and Sedentary Behaviour Guidelines, 2014. Available at [www.health.gov.au/internet/main/publishing.nsf/Content/health-pubhlth-strateg-phys-act-guidelines](http://www.health.gov.au/internet/main/publishing.nsf/Content/health-pubhlth-strateg-phys-act-guidelines) (accessed 30 October 2014)
- <sup>3</sup> National Heart Foundation of Australia. Blue print for an active Australia: Government and community actions to increase population levels of physical activity and reduce sedentary behaviour in Australia , 2014-2017. 2<sup>nd</sup> edition. Melbourne: National Heart Foundation of Australia, 2014. Available at <http://www.heartfoundation.org.au/SiteCollectionDocuments/Blueprint-for-an-active-Australia-Second-edition.pdf> (accessed 30 October 2014)
- <sup>4</sup> Kent J, Thompson S and Jalaludin B. Healthy Built Environments: A review of the literature. Sydney: Healthy Built Environments Program, City Futures Research Centre UNSW, 2011 Available at [https://www.be.unsw.edu.au/sites/default/files/upload/pdf/cf/hbep/publications/attachments/HBEPLiteratureReview\\_FullDocument.pdf](https://www.be.unsw.edu.au/sites/default/files/upload/pdf/cf/hbep/publications/attachments/HBEPLiteratureReview_FullDocument.pdf) (accessed 30 October 2014)
- <sup>5</sup> Healthy Spaces and Places, 2009. Available at [www.healthyplaces.org.au](http://www.healthyplaces.org.au) (accessed 30 October 2014)
- <sup>6</sup> National Heart Foundation of Australia, 2009. *The built environment and walking*, Position Statement prepared on behalf of the National Physical Activity Program Committee (Chief authors: Gebel, K., Bauman, A., Owen, N., Foster, S., Giles-Corti, B.) Available at <http://www.heartfoundation.org.au/active-living/Documents/Built-environment-position-statement.pdf> (accessed 30 October 2014)
- <sup>7</sup> Udell T, Daley M, Johnson B, Tolley R. Does Density Matter? The role of density in creating walkable neighbourhoods. Melbourne: National Heart Foundation of Australia, 2014 Available at [www.heartfoundation.org.au/density](http://www.heartfoundation.org.au/density) (accessed 30 October 2014)
- <sup>8</sup> Giles-Corti B, Ryan K, Foster S. Evidence review. Increasing density in Australia: maximising the health benefits and minimising harm. Melbourne: National Heart Foundation of Australia, 2012. Available at <http://www.heartfoundation.org.au/active-living/Documents/Increasing-density-in-Australia-Evidence-Review-2012.pdf> (accessed 30 October 2014)