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Dear Sir or Madam

Thank you for the opportunity to comment on the Draft *Central Coast Regional Plan*. The Heart Foundation, as a health NGO with a commitment to improving the cardiovascular health of all Australians, has a long standing interest in the relationship between health and urban planning. A person's capacity to live a healthy life is significantly influenced by their physical environments, which impact both directly on their individual lifestyle choices and indirectly through their social environments.

There is considerable evidence that the environment in which people live significantly impacts on the cardiovascular health of the population, influencing the prevalence of risk factors for developing CVD and people's ability to effectively manage a cardiovascular health problem to achieve optimum health and well-being. The Heart Foundation has a long standing commitment to improving the environment in which people live in NSW in order to improve the cardiovascular health of the population. We do this through participation in key planning forums, submissions to public enquiries, research and disseminating information on best practice urban planning to support healthy living.

Significant lessons have been learned from urban growth experiences, both in Australia and overseas, and the Central Coast has the opportunity to build an environment which meets both the economic and the health needs of its residents. In fact, the importance of health in planning was included in the NSW Planning Bill 2013 which explicitly connects the Objects of the proposed Planning Act to solid policy action. Objective 7 states the proposed Planning Act will promote:

***'Health, safety and amenity in the planning, design, construction and performance of individual buildings and the built environment'***.

We welcome the opportunity to provide comment on the draft Central Coast Regional Plan and make the following recommendations informed by our expertise in healthy urban planning.

### **Vision and Goals**

The Heart Foundation argues that growth and development needs to promote the health and wellbeing of the community and be ecologically sustainable, not just economically driven. The vision for 'liveable communities' in the Plan is laudable, but a clearer definition of what a

liveable community means from a health and wellbeing perspective is needed. We recommend the following definition of liveable communities be included.

From a social determinants of health perspective, liveable communities are regarded as *'safe, attractive, socially cohesive and inclusive, and environmentally sustainable, with affordable and diverse housing linked via public transport, walking, and cycling to employment, education, public open space, local shops, health and community services, and leisure and cultural opportunities'*<sup>1</sup>.

We strongly recommend that community health and wellbeing should be an explicit objective of the Central Coast Regional Strategy, and incorporated into the Goals. This would be consistent with the two NSW Government State Regional Plans which have been finalised to date - the *Illawarra/Shoalhaven Regional Plan* and the *Plan for Growing Sydney*. Both of these Plans have goals which incorporate health as an objective for planning, as follows:

Illawarra/Shoalhaven Regional Plan - **GOAL 3: A region with communities that are strong, healthy and well-connected**

Plan for Growing Sydney - **GOAL 3: A great place to live with communities that are strong, healthy and well connected**

For consistency, the Heart Foundation suggests that the following goals from the Illawarra-Shoalhaven Regional Plan also meet the needs of the Central Coast. We suggest that the current goals be changed as follows:

- replace “enhance community lifestyle and accelerate housing supply” with “*A region with a variety of housing choices, with homes that meet needs and lifestyles*”, and add the goal “*A region with communities that are strong, healthy, and well-connected*”;
- replace “Grow and diversify the regional economy” with “*A prosperous Central Coast region*”;
- replace “sustain productive landscapes” with “*A region that makes appropriate use of agricultural and resource lands*”; and
- replace “Protect and manage the natural and cultural environment” with “*A region that protects and enhances the natural environment*”.

## **Delivering the Plan**

We note that NSW Health is not represented in the membership of the Coordinating and Monitoring Committee (Figure 4). We suggest that, in line with the approach taken in Illawarra-Shoalhaven Regional Plan, NSW Health (and/or the Local Health District) is also represented on this Committee.

We note implementation via section 117 directions and support this approach, but suggest that a mechanism is needed to ensure the requirements of the Plan are also reflected in the Development Assessment process, as well as planning proposals and controls. To meet active living objectives for example, there is already an excellent Development Assessment resource available<sup>2</sup> for the NSW Planning System (and targeted to the Department of Planning & Environment, Councils, Proponents and Consultants).

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<sup>1</sup> Badland et al, 2015. How liveable is Melbourne? Conceptualising and testing urban liveability indicators. Progress to date. McCaughey VicHealth Community Wellbeing Unit.

<sup>2</sup> PCAL, 2010, Development and Active Living: Designing Projects for Active Living. Available at: [http://www.pcal.nsw.gov.au/data/assets/pdf\\_file/0007/99943/PCAL\\_Final\\_web-v1\\_6.pdf](http://www.pcal.nsw.gov.au/data/assets/pdf_file/0007/99943/PCAL_Final_web-v1_6.pdf)

## **Goal 1: Enhance community lifestyles and accelerate housing supply**

### **Direction 1.1 Create great places to live**

Guidelines for planning, designing and developing safe, inclusive, enjoyable and healthy built environments are essential to achieving the goals of the Plan. We support Action 1.1.4 to work with the NSW Healthy Planning Expert Working Group and relevant councils to develop guidelines. However, the Local Health District should also have representation on the Expert Working Group and community input into what is needed to be safe and healthy must also be considered. It is not explicit though how such guidelines would be implemented, and we recommend consideration of a mechanism to ensure the guidelines do actually translate into healthy places and spaces.

There is a range of healthy planning guidance available to guide this action and a wealth of evidence to support the inclusion of healthy planning principles in the Plan. Relevant examples include:

- The Heart Foundation's Healthy Active by Design website<sup>3</sup>
- Resources from NSW Premier's Council for Active Living, including:
  - Designing Places for Active Living<sup>4</sup>
  - Development and Active Living<sup>5</sup>
- NSW Health's Healthy Urban Development Checklist<sup>6</sup>
- University of NSW's Healthy Built Environments – A Review of the Literature<sup>7</sup>

### **Action 1.1.3 Investigate opportunities to grow and better connect walking and cycling networks**

The Heart Foundation commends the priority given to walking and cycling transport networks and commends the work which has already been done on the Central Coast to build walking and cycling infrastructure. However we suggest that the Action be worded with a greater level of commitment to the development of better connected walking and cycling paths by removing the words "investigate opportunities to" from the Action. We also suggest that the two roles of walking/cycling for recreation and tourism, and walking/cycling for active daily transport be delineated as these may involve different planning decisions. Tracks through bushland, for example, may require environmentally sensitive design (such as choice of track surface materials) which is not consistent with commuter transport objectives.

We suggest that the dot point (p17) "prioritise links to create a connected network that" be amended as follows:

- Provides environmentally appropriate use of bushland and foreshores to encourage walking and cycling
- Provides active daily transport options for residents to access jobs and services by walking and cycling

### **Direction 1.3 Create connected and accessible communities and centres**

The Heart Foundation supports the intent to create connected and accessible communities and centres. It is concerning that such a high percentage of the Central Coast population (23

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<sup>3</sup> [www.healthyactivebydesign.com.au/](http://www.healthyactivebydesign.com.au/)

<sup>4</sup> [www.pcal.nsw.gov.au/planning\\_and\\_design\\_guidelines](http://www.pcal.nsw.gov.au/planning_and_design_guidelines)

<sup>5</sup> [www.pcal.nsw.gov.au/\\_data/assets/pdf\\_file/0007/99943/PCAL\\_Final\\_web-v1\\_6.pdf](http://www.pcal.nsw.gov.au/_data/assets/pdf_file/0007/99943/PCAL_Final_web-v1_6.pdf)

<sup>6</sup> [www.health.nsw.gov.au/urbanhealth/Pages/healthy-urban-dev-check.aspx](http://www.health.nsw.gov.au/urbanhealth/Pages/healthy-urban-dev-check.aspx)

<sup>7</sup> <https://cityfutures.be.unsw.edu.au/research/programs/city-wellbeing/city-wellbeing-resources/>

per cent quoted on pg. 18) need to commute out of the region each day to work in Sydney or Newcastle. Long, sedentary commutes reduce the discretionary time that residents have available for active recreation and other healthy behaviours. Integration of incidental physical activity into daily transport, by facilitating walking and/or cycling to public transport stops and stations, must be a significant priority.

Accordingly, planned upgrades to the road network need to prioritise and accommodate active travel modes (walking, cycling, and bus priority). Physically separated pedestrian and cycle paths should be included as part of all new major road projects or upgrades, particularly those within and around identified economic corridors. We argue that positive provision of such infrastructure upfront should be a condition of receiving government funding for road projects. The Heart Foundation urges the government to include in all tenders for new roads, requirements for cycling and walking infrastructure, express bus lanes, connection with public transport and beginning/end of trip facilities for secure bike storage.

Ensuring that access to transport and seamless links to community hubs (retail, health, services, etc.) is part of any new housing developments will be essential to improving connectivity and reducing isolation for new residents. The prioritisation of people walking or cycling over vehicles is fundamental and is a principle of the National Urban Design Protocol (*Creating Places for People- an urban design protocol for Australian Cities*<sup>8</sup>) a principles based guide to best practice urban design.

#### **Direction 1.4 Accelerate housing supply**

Housing is a fundamental social determinant of health. While housing on the central coast is more affordable than Sydney, it also needs to be recognised that the socio-economic profile of residents varies and therefore housing affordability is relative. It is the Heart Foundation's view that the Plan needs to be more explicit about how affordable housing is defined and how it will be provided alongside new development proposed in the Plan. We urge consideration of inclusionary planning approaches to preserve affordable housing opportunities for land that is earmarked for rezoning and/or for significant infill developments.

We recommend the Central Coast Regional Plan clearly define 'affordable housing', as per relevant Local Environment Plans (LEPs). For example, Gosford LEP states: "*affordable housing has the same meaning as in the Act. Note. The term is defined as housing for very low income households, low income households or moderate income households, being such households as are prescribed by the regulations or as are provided for in an environmental planning instrument*". Affordable rental housing should be defined according to the State Environment Planning Policy (Affordable Rental Housing) 2009.

The Heart Foundation has commissioned a number of evidence papers<sup>9</sup> on the links between density, walking and health and caution that the relationship between density, other related built environment variables and health is complex and contextual. We support density thresholds in suburban areas that are sufficient to support access to local infrastructure and public transport to promote walking and cycling, and around activity centres and public transport hubs to encourage public transport access, walking and cycling.<sup>10</sup> However, potentially unintended consequences of high density on liveability and health demands careful consideration. The Heart Foundation's *Evidence review - Increasing*

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<sup>8</sup> Infrastructure Australia – [www.infrastructure.gov.au/policy-publications/publications](http://www.infrastructure.gov.au/policy-publications/publications)

<sup>9</sup> <http://heartfoundation.org.au/for-professionals/built-environment>

<sup>10</sup> Heart Foundation, 2014, *Blueprint for an Active Australia*, second edition

*density in Australia: maximising the health benefits and minimising harm*<sup>11</sup> concludes that if planned effectively, increasing population *and employment* density has the potential to produce benefits to the environment and the community, through increased levels of incidental physical activity. However, despite good intent, it is easy to get this wrong without careful consideration of the location, type and density of housing needed, the jobs-housing balance, the socio-demographic mix of the population and the supporting amenity required (including sufficient green and open space).

Our review also argues that “achieving higher densities through lower rise development would appear to be optimal not only for families, but also older adults” and “that it is optimal for higher density housing to be located away from roads with heavy traffic, but also within easy access of public transport, shops, services and a hierarchy of POS (Public Open Space).” Based on the evidence we have commissioned, the Heart Foundation urges careful consideration of appropriate levels and location of housing density, employment density, public transport access and ensuring other supporting amenity in the centres identified for greater densification within the economic corridors, and particularly in Gosford City Centre (Direction 2.3). Our discussion paper *Does Density Matter*<sup>12</sup> examines the range of essential factors that work with density to create walkable neighbourhoods and emphasises the synergistic nature of the relationship between these variables.

### **Direction 1.5 Improve Housing Choice (Infill)**

Housing choice is important and we advocate for appropriate housing diversity and mixed density in response to community need. As noted above, open space and social infrastructure needs will also increase as population density increases with infill development comprising apartments and town houses. We recommend an action be included in the Plan outlining how these needs will be assessed and met.

### **Direction 1.6 Concentrate new development at Warnervale and elsewhere in North Wyong**

There is no mention of public transport links or improvements to public transport services to the Warnervale Town Centre or indeed to the proposed land release areas. A new intersection and access road and the Warnervale Link Rd suggest a reliance on private motor vehicles as the dominant transport mode. How will walking and cycling be facilitated and public transport planning be coordinated? It is not clear whether the land release areas will be zoned for a variety of land uses, to stimulate creation of walkable destinations within new development areas. Evidence suggests that low density development, predominated by single land uses, and without significant public transport provision will not support integration of transport related physical activity into daily life.<sup>13</sup>

### **Direction 2.5 Focus growth within the Tuggerah to Warnervale corridor**

The intention to develop Warnervale as the next Town Centre for the Central Coast presents an opportunity to integrate healthy design and planning principles from the outset, along with development of appropriate indicators to monitor health supporting outcomes. To mitigate

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<sup>11</sup> Source: <http://heartfoundation.org.au/images/uploads/publications/Increasing-density-in-Australia-Evidence-Review-2012-trevor.pdf>

<sup>12</sup> Udell et al, 2014, Does Density Matter? The role of density in creating walkable neighbourhoods. National Heart Foundation of Australia.

<sup>13</sup> Giles Corti et al, 2014, Evidence review. Low density development- impacts on physical activity and associated health outcomes. National Heart Foundation of Australia.

potential traffic congestion issues, it is vital to support active and public transport as priority modes from the outset, and plan accordingly. We also encourage provision for local small scale business in the community in addition to major retail and commercial centres, as these local shops and services create a walkable destination for local communities to service daily needs.

## Monitoring and Indicators

The Heart Foundation recommends that measures of population health, wellbeing and healthy built environment indicators are included in the proposed framework for reporting progress, to be established by the Central Coast Regional Plan Coordination and Monitoring Committee. Healthy built environment and health/wellbeing related 'liveability' indicators should inform plan making at the local and regional level. The inclusion of such indicators would assist in prompting coverage of such matters as well as in evaluating performance against a health-based objective in the strategy. There are a number of sources from which to derive relevant indicators. For example:

- The series of State of Australian Cities reports<sup>14</sup> 2010 -2105 include indicators relevant to health, travel behaviours and social inclusion that could be included or adapted for the regional level.
- UNSW City Wellbeing has recently published *Healthy Built Environment Indicators*<sup>15</sup> to help policy makers and practitioners monitor the success of Healthy Built Environments. This resource consolidates a range of measures and advises where to find data and evidence to assess various built environment characteristics.
- The Hunter New England Population Health's *Liveability Assessment Tool*<sup>16</sup> provides a community participation framework whereby local governments and their partners can assess liveability within a particular geographical area on an ongoing basis.

Further, as part of the National Liveability Study, The McCaughey VicHealth Centre for Community Wellbeing, University of Melbourne is in the process of developing and validating a national set of spatially derived built environment liveability indicators<sup>17</sup> related to non-communicable disease risk behaviours and/or health outcomes. These evidence based indicators should be considered for implementation in NSW when they become available.

## Summary of Recommendations

1. Include a clear definition of what a liveable community means from a health and wellbeing perspective, using the suggested definition on page 1 of this submission.
2. Improving community health and wellbeing should be an explicit objective of the Central Coast Regional Strategy, and incorporated into the Goals, in line with the approach taken in the Illawarra/Shoalhaven Regional Plan.
3. For consistency, align the goals for the Central Coast Regional Plan with the wording of the goals in the Illawarra-Shoalhaven Regional Plan.

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<sup>14</sup> Australian Government. Department of Infrastructure and Regional Transport. State of Australian Cities reports <https://infrastructure.gov.au/infrastructure/pab/soac/>

<sup>15</sup> 2016. UNSW City Wellbeing. Healthy Built Environment Indicators. Available at: <https://cityfutures.be.unsw.edu.au/research/programs/city-wellbeing/>

<sup>16</sup> Hunter New England Population Health (2012). *Liveability Assessment Tool*. Hunter New England Population Health. [www.hnehealth.nsw.gov.au/hneph/communities/Documents/Liveability%20Assessment%20Tool\\_Final\\_Low%20Res%20Version%20%20%282%29.pdf](http://www.hnehealth.nsw.gov.au/hneph/communities/Documents/Liveability%20Assessment%20Tool_Final_Low%20Res%20Version%20%20%282%29.pdf)

<sup>17</sup> Badland et al, 2015. How liveable is Melbourne? Conceptualising and testing urban liveability indicators. [http://www.communityindicators.net.au/files/docs/How%20liveable%20is%20Melb%202015\\_Final.pdf](http://www.communityindicators.net.au/files/docs/How%20liveable%20is%20Melb%202015_Final.pdf)

4. Include NSW Health (e.g. Central Coast Local Health District) representation in the membership of the Coordinating and Monitoring Committee (Figure 4).
5. Develop and describe a mechanism to ensure the requirements of the Plan are also reflected in the Development Assessment process, as well as planning proposals and controls.
6. Include Local Health District representation on the Healthy Planning Expert Working Group to develop guidelines for healthy built environments and ensure there is a process for community input.
7. Action 1.1.3 to be worded with a greater level of commitment to the development of better connected walking and cycling paths by removing the words “investigate opportunities to” from the Action.
8. Under Action 1.1.3, clearly delineate the two roles of walking/cycling for recreation and tourism, and walking/cycling for active daily transport as these may involve different planning decisions.
9. Include requirements for cycling and walking infrastructure, express bus lanes, connection with public transport and beginning/end of trip facilities in all tenders for new roads planned within the Central Coast.
10. Clearly define ‘affordable housing’ (as per relevant Local Environment Plans such as Gosford) and articulate how it will be provided alongside new development proposed in the Plan.
11. Use available evidence on density and health to give careful consideration to appropriate levels and location of housing density, employment density, public transport access, open space and ensuring other supporting amenity in the centres identified for greater densification.
12. Include an action outlining how open space and social infrastructure needs will be assessed and met, as population density increases within in the economic corridors and Gosford City.
13. Integrate healthy design and planning principles in the Warnervale Town Centre from the outset and ensure upfront provision of active travel alternatives.
14. Include *Healthy Built Environment* and health/wellbeing indicators in the proposed framework for reporting progress to be established by the Central Coast Regional Plan Coordination and Monitoring Committee.

### **Further information**

For further information about this submission, please contact Julie Anne Mitchell, Director, Cardiovascular Health, Heart Foundation, NSW.

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Yours sincerely



**KERRY DOYLE PSM**

Chief Executive New South Wales

22 March 2016

## Appendix

The Heart Foundation's work in healthy planning with downloadable resources can be accessed on the Heart Foundation's web page <http://heartfoundation.org.au/professionals/built-environment>