



Department of Planning and Environment  
North Coast Regional Office  
Locked Bag 9022  
Grafton NSW 2460

Dear Sir or Madam

Thank you for the opportunity to comment on the Draft *North 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.<sup>1</sup>

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 North 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 North Coast Regional Plan and make the following recommendations informed by our expertise in healthy urban planning.

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<sup>1</sup> University of NSW (2011) Healthy Built Environments – A Review of the Literature  
<https://cityfutures.be.unsw.edu.au/research/programs/city-wellbeing/city-wellbeing-resources/>

## **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 'great place to live' (pg. 11) 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 and healthy environments 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>2</sup>.

We strongly recommend that supporting community health and wellbeing should be an explicit objective of the North Coast Regional Plan, and incorporated into the Vision and 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**

### **Recommendation:**

*Amend the draft North Coast Regional Plan's vision to more explicitly reference to promoting a prosperous and healthy community.*

*Amend Goal 2 to: 'creating a great place to live and work with communities that are strong, **healthy** and well connected.'*

## **Delivering the Plan**

We argue that for greater integration of service delivery alongside growth in population, housing and employment, the membership of the Coordinating and Monitoring Committee should be expanded. 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 (e.g. through the Northern NSW Local Health District) is also represented on this Committee. Further, given the ageing population profile and significant Aboriginal community in the region, there should also be representation from NSW Family and Community Services and relevant Aboriginal Community Controlled Organisation representation.

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

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<sup>2</sup> Badland et al, 2015. How liveable is Melbourne? Conceptualising and testing urban liveability indicators. Progress to date. McCaughey VicHealth Community Wellbeing Unit.

active living objectives for example, there is already an excellent Development Assessment resource available<sup>3</sup> for the NSW Planning System (and targeted to the Department of Planning & Environment, Councils, Proponents and Consultants).

**Recommendation:**

*Include representation from NSW Health, NSW Family and Community Services and an appropriate Aboriginal Community Organisation on the Coordinating and Monitoring Committee.*

**Monitoring the Plan**

Healthy built environment, active travel 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>4</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>5</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.

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>6</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.

**Recommendation:**

*Measures of population health, wellbeing, active travel and healthy built environment indicators are included in the proposed framework for reporting progress, to be established by the North Coast Regional Plan Coordination and Monitoring Committee.*

**Goal 2: Focus growth opportunities to create a great place to live and work**

**Direction 2.1 Grow the North Coast's regional cities as a focus for economic activity and population growth**

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<sup>3</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)

<sup>4</sup> Australian Government. Department of Infrastructure and Regional Transport. State of Australian Cities reports <https://infrastructure.gov.au/infrastructure/pab/soac/>

<sup>5</sup> 2016. UNSW City Wellbeing. Healthy Built Environment Indicators. Available at: <https://cityfutures.be.unsw.edu.au/research/programs/city-wellbeing/>

<sup>6</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)

We support the intent of the Plan to manage growth to protect the conservation, biodiversity and economic value of the rural and coastal landscapes and ‘to create a great place to live and work’. We argue that a ‘great’ place must also be a healthy place. Accordingly, Goal 2 should be re-worded in line with our earlier recommendation, with corresponding actions that ensure growth is ecologically sustainable.

While the Plan acknowledges the pressures of future growth on the regional coastal cities of Port Macquarie, Coffs Harbour and Tweed Heads, these three areas are nonetheless targeted for significant growth. The strategies to encourage and stimulate growth (population and employment) of inland centres and towns could be much more explicit, and thereby alleviate growth pressures on the sensitive coastal regions. We argue that jobs growth must be integrated with urban growth so that local job creation facilitates more options for active commuting and social connection. It is vital that the communities in the regional cities earmarked for significant growth are engaged in the planning decisions that will affect them.

We support the intent to encourage a greater mix of dwelling types in the regional cities.

**Recommendation:**

*Include an additional Action that indicates how population and employment growth will be encouraged in the inland centres and towns on the North Coast.*

**Direction 2.3 Focus growth to the least sensitive and constrained areas to protect natural assets**

We support the intent to focus urban growth to the least sensitive and constrained areas in order to protect farmland, sensitive ecosystems and heritage assets. Locating housing close to existing centres is also supported, to enable incorporation of physical activity through the use of walking, cycling and public transport.

It is not clear however whether local growth management strategies (Action 2.3.2) will enable a *mixing* of land uses to support the creation of local destinations within a walkable or rideable distance, where feasible. 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>7</sup> For this reason, we also question the value of ‘spot rezoning’ as may occur under the Urban Growth Area Variation Principles (pg. 49) as they are currently written.

We note the purpose of the Urban Growth Area Variation Principles is to manage potential variation to mapped growth areas. In our view, the Principles are too ambiguous to provide certainty for communities in the way they may be applied by decision makers. For example, what are the thresholds or standards that would determine whether a given Principle was met? How will the community be engaged early in the process of decision making? It is important that small lot urban agriculture is also protected to ensure local fresh food production is preserved near expanding urban areas.

We are concerned by the Plans statement that ‘active and passive open spaces may be located outside the urban growth areas (p.48)’. This conflicts with good urban design practice that recommends the integration of green and open spaces *within* urban growth

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<sup>7</sup> Giles Corti et al, 2014, Evidence review. Low density development- impacts on physical activity and associated health outcomes. National Heart Foundation of Australia.

areas, to ensure they are easily accessible. Best practice dictates that quality open space should be available within a walkable catchment of most residents.<sup>8</sup>

**Recommendation:**

*Include an Action under 2.3.1 to ensure that green and open spaces are protected and included within urban growth areas.*

**Direction 2.4 Provide great places to live through good design**

We strongly support the intent of this Direction. There is a range of existing healthy planning guidance that can be applied to council led precinct planning (Action 2.4.1) to ensure the objective of *'promoting new developments that enrich the quality of life and wellbeing of residents'* (p.50) and enable healthy lifestyles. Similarly, the review of the North Coast Urban Design Guidelines (Action 2.4.3) should incorporate healthy design principles, with input from the Healthy Environments team within the Northern NSW Local Health District, the relevant councils and the local community.

Existing healthy planning guidance available to guide this action includes:

- The Heart Foundation's *Healthy Active by Design* website<sup>9</sup>
- NSW Health's Healthy Urban Development Checklist<sup>10</sup>
- Resources from NSW Premier's Council for Active Living, including:
  - Designing Places for Active Living<sup>11</sup>
  - Development and Active Living<sup>12</sup>

**Recommendation:**

*That the review and update of the North Coast Urban Design Guidelines makes specific reference to incorporating contemporary, healthy urban planning principles.*

**Action 2.4.2. Encourage healthy living by increasing options for public transport, walking and cycling**

It is commendable to see an action that recognises the link between healthy living and walking, cycling and access to public transport, and we reassert that this needs to be complemented with higher level goals in the Plan that support healthy living. Evidence indicates that both active living and social connection can be enhanced through active travel and recreation.<sup>13</sup> While public transport is mentioned in the title of Action 2.4.2, there is no detail provided about strategies to create more options for public transport.

Further, it is unclear how *recreational* walking and cycling will be supported by this Action. Given the tourism focus in the region, there is great potential for improved bushland and foreshore walking, with the right infrastructure, programs and events/promotion.

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<sup>8</sup> [www.healthyactivebydesign.com.au/](http://www.healthyactivebydesign.com.au/)

<sup>9</sup> [www.healthyactivebydesign.com.au/](http://www.healthyactivebydesign.com.au/)

<sup>10</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>11</sup> [www.pcal.nsw.gov.au/planning\\_and\\_design\\_guidelines](http://www.pcal.nsw.gov.au/planning_and_design_guidelines)

<sup>12</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>13</sup> [www.healthyactivebydesign.com.au/](http://www.healthyactivebydesign.com.au/)

## **Recommendation:**

*Strengthen Action 2.4.2 to give greater emphasis to how public transport options will be encouraged.*

*Include an additional Action in this section that focusses specifically on enhancing recreational walking and cycling for healthy living and increased tourism and economic activity- or at least cross reference with the appropriate actions under Goal 4 in the draft Plan.*

## **Goal 3: Housing choice, with homes that meet the needs of changing communities**

### **Direction 3.1 Provide sufficient housing supply to meet the demands of the north coast**

We note the policy under Goal 3 for multi-unit housing to represent 40 per cent of new housing in the region (p.54). To encourage healthy living, it is vital that new urban release areas offer diversity in both housing choice and land use, with sufficient social infrastructure, employment options, shops and services and open space provided so that daily needs can be met locally.

### **Direction 3.2 Deliver housing choice to suit changing needs**

We support the vision for a more compact urban form through mixed density at thresholds sufficient to ensure the viability of local shops, services and public transport, because people are more likely to walk and ride when destinations are nearby.<sup>14</sup> To inform our views, the Heart Foundation commissioned a number of evidence papers<sup>15</sup> on the links between density and health and we caution that the relationship between density, other built environment variables and health is complex and contextual. Potentially unintended consequences of high density on liveability and health need careful consideration.

The Heart Foundation's *Evidence review - Increasing density in Australia: maximising the health benefits and minimising harm*<sup>16</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 transport, social infrastructure and 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", which is relevant to the demographic mix of the North Coast region.

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<sup>14</sup> Heart Foundation, 2014, Blueprint for an Active Australia, second edition

<sup>15</sup> <http://heartfoundation.org.au/for-professionals/built-environment>

<sup>16</sup> Source: <http://heartfoundation.org.au/images/uploads/publications/Increasing-density-in-Australia-Evidence-Review-2012-trevor.pdf>

Our discussion paper *Does Density Matter*<sup>17</sup> examines the range of factors that must work with density to create walkable neighbourhoods and emphasises the synergistic nature of these factors, including but not limited to, frequent public transport. Access to a wider range of social infrastructure is needed to supplement multi-unit housing expansion in regional cities and centres, than transport access alone (Action 3.2.1). We recommend an action also be included in the Plan outlining how these other supporting infrastructure needs will be assessed and met (such as public open space, green space, schools, childcare, retail, employment, place making needs), along with the proposed minimum supply of 28,900 multi-unit dwellings (p.58).

**Recommendation:**

*That an additional Action is included in the Plan to investigate the range of social and other supporting infrastructure needed to support an increase in housing diversity through multi-unit dwellings..*

### **Direction 3.3 Deliver more opportunities for affordable housing**

Housing is a fundamental social determinant of health. We agree that a range of policy levers and incentives by both the NSW Government and relevant councils are required to deliver more affordable housing (including rental housing) and we support the commitment of the NSW Government to develop the whole of government strategy (p.61).

We suggest the North Coast Regional Plan include both a target for affordable housing provision and a more explicit definition of 'affordable housing', encompassing social, public and affordable housing, as per relevant Local Environment Plans (LEPs). Affordable rental housing should be defined according to the State Environment Planning Policy (Affordable Rental Housing) 2009. We encourage the inclusion of affordable housing for new developments through controls in LEPs and DCPs. Aboriginal and Torres Strait Islander peoples face the highest levels of housing stress, overcrowding and homelessness of any segment of the Australian community,<sup>18</sup> so there needs to be a tailored strategy and funding directed specifically to meeting this need, among the broader response.

While caravan parks and manufactured home estates (pg. 61) may increase the supply of 'affordable' housing in the short term, there are hidden ongoing financial costs (and social impacts) from lower quality housing and there should not be a reliance on this strategy to deliver quality affordable housing.

**Recommendation:**

*Include a target in the Plan for a percentage of new homes to be set aside for affordable housing and indicate where these homes will be provided. (NSW Federation of Housing Associations nominate a 30% target for new developments<sup>19</sup>).*

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<sup>17</sup> Udell et al, 2014, Does Density Matter? The role of density in creating walkable neighbourhoods. National Heart Foundation of Australia.

<sup>18</sup> National Shelter, 2016. [http://www.qshelter.asn.au/elements/2016/05/VoteHome\\_16\\_7ppA4\\_c-2.pdf](http://www.qshelter.asn.au/elements/2016/05/VoteHome_16_7ppA4_c-2.pdf)

<sup>19</sup> <http://www.communityhousing.org.au/>

## **Goal 4: A prosperous economy with services and infrastructure**

### **Direction 4.2. Develop health services precincts**

We support the development of health services precincts and encourage a multi-modal approach to their transport planning to ensure they are a public (and active) transport priority, especially as these precincts will also be a significant employment hub. While NSW Health have 'a range of prevention measures in place that promote a healthy lifestyle' (p.66) with the intent of reducing demand for hospital services, we re-assert that the design of the built environment is critical to supporting the behaviours that constitute a 'healthy lifestyle' and that the final strategies and actions in the North Coast Regional Plan will be equally important in their impact on the healthy lifestyles of North Coast residents and workers. This strengthens the rationale for NSW Health representation and input into the broader Plan.

## **Goal 5: Improved transport connectivity and freight networks**

Transport is an important social determinant of health and is critical for social connection and addressing social disadvantage. In our view the transport focus in the Plan is heavily skewed to road and freight and does not yet adequately address public and active transport.

A notable omission is a Direction and corresponding Actions that focus on improving walking and cycling networks for transport, especially within the growth areas of regional cities and centres where major trip generators (health precincts, education, retail, employment etc) can be feasibly connected within walking and riding distance of many residents. Walking and riding are also important components of longer trips by public transport, so connectivity to transport hubs should also be addressed.

### **Recommendation**

*That a Direction is included under Goal 5 that outlines actions to enhance the connectivity of walking and cycling transport networks - which can cross reference with existing Action 2.4.2 (pg. 51) under Direction 2.4 (pg.50) that refers to programs to improve walking and cycling.*

### **Direction 5.3 Enhance the connectivity of the regions road and rail freight and transport services**

There is little detail under this Direction about planned action to improve public transport services in the region (including future rail or light rail). While Action 5.3.2 mentions the importance of investing in public transport, we argue the Plan should include more detail about how the public transport needs of north coast residents and visitors will be assessed and met. While we support more cycling and walking as tourism and leisure activities alongside the Casino to Murwillumbah rail corridor (p.65), we argue that any development should also protect the corridor for future public transport use, as the need arises.

Planned upgrades to the road network also need to prioritise and accommodate active and public transport modes (e.g. walking, cycling, and bus priority). Physically separated walking and cycle paths should be included as part of all new major road projects or upgrades within the North Coast regional cities and centres. We argue that positive provision of such infrastructure upfront should be a condition of receiving government funding for these projects.



We strongly support investment in enhanced public transport infrastructure and services to improve connections and reduce social disadvantage between regional centres, settlements and urban areas. The ageing population profile of the North Coast region indicates this should be a priority.

**Recommendation:**


*Strengthen the actions for assessing and improving public transport services on the North Coast, including the links to South East Queensland*

**Further information**

For further information about this submission, please contact:

- Michelle Daley, Senior Manager Active Living, Heart Foundation, NSW  
[Michelle.Daley@heartfoundation.org.au](mailto:Michelle.Daley@heartfoundation.org.au)
- Julie Anne Mitchell, Director, Cardiovascular Health, Heart Foundation, NSW  
[Julie-Anne.Mitchell@heartfoundation.org.au](mailto:Julie-Anne.Mitchell@heartfoundation.org.au)

Yours sincerely



**KERRY DOYLE PSM**

Chief Executive New South Wales

23 May 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/for-professionals/built-environment>