



Department of Planning and Environment
Central West and Orana Regional Office
GPO Box 58
Dubbo NSW 2830

Dear Sir or Madam,

Thank you for the opportunity to comment on the Draft *Central West and Orana 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.¹

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 West and Orana region 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 West and Orana Regional Plan and make the following recommendations informed by our expertise in healthy urban planning.

¹ 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 places and a healthy environment in the Plan (p.13) is laudable, but a clearer definition of what liveability means from a health and wellbeing perspective is needed. We recommend the following definition be included.

From a social determinants of health perspective, liveable places 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’².

We strongly recommend that supporting community health and wellbeing should be an explicit objective of the Central West and Orana 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 Central West and Orana Regional Plan’s vision to more explicitly reference to promoting a prosperous and healthy community.

Amend Goal 4 to: ‘Strong communities and healthy, liveable places that cater for the region’s changing population’

Delivering the Plan

Governance

We argue that for greater integration of service delivery alongside growth in population; housing; economy and employment; and natural environment and resources; 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 5). We suggest that, in line with the approach taken in Illawarra-Shoalhaven Regional Plan, NSW Health (e.g. through the Western NSW Local Health District) is also represented on this Committee. Further, given the ageing population profile and significant Aboriginal heritage and community in the region, there should also be

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

representation from NSW Family and Community Services and relevant Aboriginal Community Controlled Organisation representation.

Implementation

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 available³ for the NSW Planning System (and targeted to the Department of Planning & Environment, Councils, Proponents and Consultants).

Infrastructure coordination and local planning initiatives: Indicators

Healthy built environment, active travel and health/wellbeing related 'liveability' indicators should inform plan making and monitoring 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 reports⁴ 2010 -2015 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*⁵ 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 indicators⁶ 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.

Recommendations:

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

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 Central West and Orana Regional Plan Coordination and Monitoring Committee.

³ 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

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

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

⁶ 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

Goal 2: A region with strong freight transport and utility infrastructure networks that support economic growth

As well as supporting economic growth, transport is an important social determinant of health and is critical for social connection and addressing social disadvantage. The transport focus in Goal 2 is currently focussed on road and freight transport but does not detail strategies for improving passenger transport networks in the region. Public and active transport are also important transport modes for a strong local economy and for developing resilient communities (as noted on page 78 of the draft Plan). We argue that Goal 2 should be expanded to address transport integration more comprehensively.

Specifically, we recommend incorporation of a Direction and corresponding Actions that focus on improving public transport, and walking and cycling networks, 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.

Recommendations:

That Goal 2 is expanded to encompass passenger, as well as freight transport.

That a Direction is included under Goal 2 that outlines actions to enhance the connectivity of public transport, walking and cycling transport networks - which can cross reference with existing Action 4.4.3 (pg. 88) under Direction 4.4 (pg.86) that refers to delivering regionally specific urban design guidelines that provide opportunities for active transport in new and existing developments.

Goal 4: Strong communities and liveable places that cater for the region's changing population

Direction 4.1 Manage growth and change in the region's settlements

We support the intent to manage growth and change across the region in line with the projected population growth of regional cities and centres.

It is commendable to see the draft plan describe an 'aim to create attractive healthy and sustainable communities which are great places for people to live, work and visit' (pg 73). However, we argue that creating a healthy community should be a priority at the forefront of the draft plan. Accordingly, Goal 4 should be re-worded in line with our earlier recommendation on page 2.

Action 4.1.1 Support the role and function of the regional cities and regional centres

While the Plan acknowledges the future growth of the regional cities Dubbo, Orange and Bathurst through initiatives such as 'Evocities' (page 73), and focuses on their important role and function in providing many of the region's services and facilities; the strategies to encourage and stimulate growth (population and employment) of the regional centres (i.e. Mudgee, Parkes and Lithgow) could be more explicit. These regional centres, which provide supplementary services to smaller towns and villages, require a clear strategy to detail how

they are going to deliver resilient, connected communities, particularly given the projected growth in the ageing population in these broader geographical areas.

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 and centres earmarked for growth are engaged in the planning decisions that will affect them.

Recommendations:

Amend Goal 4 to: ‘Strong communities and healthy, liveable places that cater for the region’s changing population’

Include an additional Action that indicates how population, employment and services growth will be encouraged in the regional centres within the Central West and Orana region.

Direction 4.3 Increase and improve housing choice to suit the different lifestyle and needs of the population

We support the vision to increase and improve housing choices to accommodate the needs of the population. The Heart Foundation has commissioned a number of evidence papers⁷ 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. We suggest that to improve housing choice in the region, evidence-based strategic planning of land-release areas needs to be carefully considered and balanced with any potential unintended consequences of increased density on liveability and health.

Action 4.3.1 Deliver enabling planning controls that facilitate an increased range of housing choices, including infill housing close to existing jobs and services.

The Heart Foundation agrees that councils should consider the aspirations of local communities within the Central West and Orana region, that seek to optimise housing choice and provide a greater variety of housing types for the existing populations (as well as to future populations).

The Heart Foundation’s *Evidence review - Increasing density in Australia: maximising the health benefits and minimising harm*⁸ 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 Central West and Orana region.

Our discussion paper *Does Density Matter*⁹ examines the range of factors that must work with density to create walkable neighbourhoods and emphasises the synergistic nature of

⁷ <http://heartfoundation.org.au/for-professionals/built-environment>

⁸ Source: <http://heartfoundation.org.au/images/uploads/publications/Increasing-density-in-Australia-Evidence-Review-2012-trevor.pdf>

⁹ Udell et al, 2014, Does Density Matter? The role of density in creating walkable neighbourhoods. National Heart Foundation of Australia.

these factors. 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. Access to transport infrastructure is also needed to supplement housing expansion in regional cities and centres, particularly for those who do not live in close proximity to existing services and jobs (Action 4.3.1).

Recommendation:

That an Action also be included in the Plan outlining how transport (particularly active transport) and other social infrastructure (such as public open space, green space, place making needs) needs will be assessed and met.

Action 4.3.2 Facilitate a more diverse range of housing for seniors

We support the vision to increase and improve housing choices to accommodate the projected increase in older adults across the Central West and Orana region and the limited existing options available for downsizing. We support the idea of 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.¹⁰ Accordingly, the proposed increase in medium density development in close proximity to existing infrastructure and services is supported, to enable ageing in place.

Recommendation:

That an additional Action is included the Plan to investigate the range of transport and other supporting infrastructure needed to support an increase in housing diversity, specifically higher density dwellings..

Action 4.3.5 Facilitate the delivery of more affordable housing options through improved planning policies

Housing is a fundamental social determinant of health. Despite relative affordability of housing in the region, we note the decline in the proportion of housing affordable for people on low incomes (p. 85). 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 'work with councils to prepare local housing strategies that plan for a range of housing types and to consider local affordable housing needs and strategies' (p.86).

We suggest the Central West and Orana 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,¹¹ so there needs to be a tailored strategy and funding directed specifically to meeting this need, among the broader response.

¹⁰ Heart Foundation, 2014, Blueprint for an Active Australia, second edition

¹¹ National Shelter, 2016. http://www.qshelter.asn.au/elements/2016/05/VoteHome_16_7ppA4_c-2.pdf

While caravan parks and manufactured home estates (pg. 86) 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 we argue that 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. (NSW Federation of Housing Associations nominate a 30% target for new developments¹²).

Direction 4.4 Enhance community access to jobs and services by creating well-connected places designed to meet the needs of a regional community

We strongly support the intent of this Direction and agree that improving and increasing transport connections, as well as developing regional focussed urban design guidelines can improve access and proximity to jobs and services. It is pleasing to see recognition that good urban design can contribute to physical wellbeing (p.86). From our perspective, heart health can be improved by the incidental physical activity that comes from destinations being located within a walkable or rideable distance from homes and workplaces.

Action 4.4.1 Identify opportunities to provide improved and increased connections between the region's towns and villages to the regional cities.

Given the health benefit that a walkable or rideable environment can provide, it is unclear within Action 4.4.1 how transport-related walking and cycling will be assessed and supported under this Direction. Given the projected growth in the ageing population throughout the region, there is much need for enhancing active transport infrastructure, in addition to supporting programs, events/promotion.

Planned upgrades to the road network 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 Central West and Orana 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. We therefore assert that there needs to be more explicit details of how *all* forms of active transport (i.e. walking and cycling, as well as public transport) will be encouraged– which would be consistent with the Draft North Coast Regional Plan (*Action 2.4.2. Encourage healthy living by increasing options for public transport, walking and cycling*). We reassert that such an action needs to be complemented with higher level goals in the Plan that support healthy living.

Recommendation:

Include an addition Action in this section that focusses specifically on enhancing transport-related walking and cycling for healthy living and how walking and cycling connections will be improved, as well as public transport provision and links to regional airports.

¹² <http://www.communityhousing.org.au/>

Action 4.4.3 Deliver regionally specific urban design guidelines

We endorse the value of good urban design in adding to the communities 'cultural, economic and physical wellbeing' (p.88) and agree that providing opportunities for walking and cycling as active transport is one such example, as noted. However, urban design has much broader influences on health, encompassing active living, access to healthy food and facilitating social connection.

There is a range of existing healthy planning guidance that can inform the development of regionally specific urban design guidelines, which should incorporate healthy design principles, with input from the Western 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* website¹³
- NSW Health's Healthy Urban Development Checklist¹⁴
- Resources from NSW Premier's Council for Active Living, including:
 - Designing Places for Active Living¹⁵
 - Development and Active Living¹⁶

Recommendation:

That the development of regionally specific urban design guidelines incorporates healthy urban planning principles relevant to regional and rural areas.

Further information

For further information about this submission, please contact:

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Yours sincerely



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Chief Executive New South Wales

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¹³ www.healthyactivebydesign.com.au/

¹⁴ www.health.nsw.gov.au/urbanhealth/Pages/healthy-urban-dev-check.aspx

¹⁵ www.pcal.nsw.gov.au/planning_and_design_guidelines

¹⁶ www.pcal.nsw.gov.au/_data/assets/pdf_file/0007/99943/PCAL_Final_web-v1_6.pdf

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>