Comment on Explanation of Intended Effect for a Design and Place SEPP

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- 1. The intention of the Department of Industry, Environment and Planning and the Government Architect to publish a *Design and Place SEPP* and to use it collate, coordinate and update a number of existing design and planning guidelines in the state is to be welcomed.
- 2. Our comments are focussed on Principle 4 of the SEPP: 'Design sustainable and greener places for the wellbeing of people and the environment' (p.14). In particular, we are concerned with enhancement of the 'wellbeing of people' as an outcome of the design, development and habitation of residential developments.
- 3. Wellbeing is not defined in the *Explanation*, but there is now an extensive literature on the subject, and the consensus seems to be that, at the individual level, it comprises both subjective and objective assessments of: physical and mental health; social relationships; sense of safety; and economic security. Internationally, there is an interest in linking the idea of wellbeing with policy, planning, design and management by examining 'what works', including at the neighbourhood planning level. The UK-based What Works Centre for Wellbeing has reviewed recent research evidence on *Places, Spaces, People and Wellbeing*, discovering that the available Australian evidence is not plentiful.¹
- 4. Key features of the designed environment which can enhance physical and mental health and social relationships are spaces which facilitate exercise in the form of both recreational physical activity and non-motorised transport (walking and cycling). Determination of the quantity and quality of such spaces requires careful consideration based on evidence regarding recreational behaviour.
- 5. The idea of evidence-based policy is mentioned in the Explanation in relation to the *Open Space Charter* (p.33), the *Apartment Design Guide* (p.A9) and the proposed *Urban Design Guide* (pp.B3, B6), but there is a case for indicating a commitment to a program of evidence-based research linked with the *Design and Place SEPP*.
- 6. The federal government's plan, Sport 2030, which covers 'a broad range of physical activities including informal, unstructured activity such as walking, riding, swimming and running as well as traditional, structured sport',2 notes that only 30% of Australian adult residents and 19% of children reach the physical activity benchmarks recommended by the Australian Institute of Health and Welfare and the World Health Organisation and targets an increase of 15% in the number of people meeting the benchmarks by 2030.3 The NSW Office for Sport's current Strategic Plan, 2018-2022 targets an increase of 10%

¹ Bagnall, A-M., South, J., et al. (2018). *Places, spaces, people and wellbeing: full review*. London: What Works Centre for Wellbeing (https://whatworkswellbeing.org/).

² See: Australian Government (2018). *Sport 2030: Participation, performance, integrity, industry*. Canberra: Commonwealth of Australia/Department of Health, p.6.

³ See Australian Government (2018), p. 16.

for adults and 43% for children in regular participation in physical activity4. There is therefore considerable scope for suitably designed residential developments to contribute to the achievement of these target and the securing of the resultant health benefits.

- 7. In order to know whether design under the new SEPP is making these contributions research and monitoring will be required:
 - in the case of redevelopment of existing areas: 'before and after' studies;
 - in the case of new developments: comparative studies between the new development and traditionally designed developments of similar population size in similar locations.
- 8. However, it cannot simply be assumed that a development based purely on physical design criteria will automatically deliver the requisite enhanced level of physical activity. In the same way that transport capacity is planned on the basis of predicted trip levels, recreational capacity should be based on predicted physical activity levels. These will be based on anticipated size and characteristics of the development's population, current levels of participation in the metropolitan area and on state and/or national policy settings.
- 9. Accommodating a given level of physical activity requires recreational spaces and other facilities with a corresponding combined capacity. This will include a mix of green and hard-surface open spaces, linear resources (for walking and cycling), possibly aquatic facilities and, in higher density areas, indoor facilities such as recreation halls and gyms.
- 10. The above approach to planning for recreation is the basis of the Recreation Activity Benchmark (RAB) model, developed for application in high residential density development areas for Landcom.⁵ However, it can be adapted for application at any density level. It would therefore be suitable for addressing Principle 4 in the *Design and Space SEPP*.

March, 2021

⁴ See: NSW Office of Sport (2017) *Office of Sport Strategic Plan 2018-2022*. Sydney: NSW Government. The targets regular participation, was, for adults: and increase from 59% in 2017 to 65% in 2025(3+ times a week, measured differently from the AIHW and WHO); for children: from 21% in 2017 to 30% in 2020 (apparently using the same measure as AIHW/WHO).

⁵ See: Veal, A.J., Pugalis, L., and Piracha, A. (2021). From Standards to Post-standards: A review of guidelines on planning for open space and recreation in high-density areas. Report to LandCom, NSW Government, Parramatta, NSW.

Veal, A.J., and Piracha, A. (2019). The Recreation Activity Benchmark (RAB) model, Draft report to LandCom, NSW Government, Parramatta, NSW.