



Health
Western Sydney
Local Health District

**WESTERN SYDNEY LOCAL HEALTH DISTRICT
CENTRE FOR POPULATION HEALTH**

SUBMISSION IN RESPONSE TO:
Design and Place SEPP Explanation of Intended Effect

31st March, 2021

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Introduction

Western Sydney Local Health District (WSLHD), Centre for Population Health (CPH), welcomes the opportunity to comment on the NSW Department of Planning, Industry and Environment's, ***Design and Place SEPP Explanation of Intended Effect (EIE)***.

The CPH comments and recommendations for action are based on evidence relating to how the built environment impacts population health outcomes. The comments and recommendations have considered the following points:

- Chronic health conditions such as, diabetes, overweight and obesity, cancer, heart disease and mental illness are the leading cause of ill health and hospitalisation within our community. Many of these conditions share a suite of *proximate* underlying behavioural determinants such as physical inactivity, sedentary behaviour, poor nutritional intake, smoking and social isolation.
- Child development within the first 2000 days.
- The prevalence of these risk factors is in turn determined by a number of *social and environmental* determinants of health such as housing, transport, education, employment, social networks and access to healthy food.
- While the links between these health determinants and planning are complex, there is a substantial body of evidence linking the built environment to health and wellbeing outcomes of the community, particularly in the following three domains of: getting people active, connecting and strengthening communities, and providing access to healthy food options¹.

Overarching feedback

The **CPH commend** the NSW Department of Planning, Industry and Environment (DPIE) on the development of the ***Design and Place SEPP EIE*** and thank DPIE for the opportunity to provide feedback.

CPH commend the proposed changes to the Apartment Design Guide that consider the needs of residents as a result of COVID-19 changes to the way people live and work, and acknowledge the fact that many of these changes will have additional benefits to families with young children.

CPH recommend considerations are made for children, throughout the plan. Children can be understood as 'indicator species', what is good for children is likely to be good for everyone^{2,3}. In addition, significant research indicates there is no greater investment than in our children for both social and economic returns.

NSW Health has highlighted that the first 2000 days of a child's life is a critical time for physical, cognitive, social and emotional health⁴. Early life experiences are⁴:

- A strong predictor of how a child will learn in primary school.
- A predictor of school performance, adolescent pregnancy and involvement with the criminal justice system in the adolescent years.
- Linked to increased risk of drug and alcohol misuse and risk of antisocial and violent behaviour.
- Related to obesity, elevated blood pressure and depression in 20-40 year olds.
- Related to premature ageing and memory loss in older age groups.

Housing and the built environment are fundamental to human health and can directly impact a child’s development.³ The traditional notion that households with a child/children will relocate to a detached house has been challenged, with more children living in higher density than ever before. With the predicted population increases in western Sydney, in some parts the household type ‘family with children’ is projected to almost double by 2041, the proportion of children living in apartments is likely to increase.⁵

CPH have partnered with City of Parramatta Council to complete a series of work relating to Healthy Higher Density Living for Kids (HHD4K). The findings from a recent qualitative study, as part of this series, have been referred to throughout the comments and recommendations below. This report and the additional reports in this series can be made available upon request to CPH.

Comments and recommendations

The CPH comments and recommendations, listed below, aim to support and strengthen the outcomes of the *Design and Place SEPP EIE*.

Section	Reference in Strategy	WSLHD, CPH comment and recommendation
Part 2: Proposed new SEPP (Design and Place)		
2.2 Aims of the new SEPP	2.2.1. Connecting with Country, p.13	<p>CPH commend the inclusion of ‘Connecting with Country’ within the <i>Aims of the new SEPP</i>.</p> <ul style="list-style-type: none"> • ‘Connecting with Country’ will contribute to improving the health and wellbeing of Aboriginal communities. • Design and activation of spaces that reflect Aboriginal culture and heritage; provides an important acknowledgment of place for the Aboriginal community and offers the community as a whole, increased opportunities to learn and understand about Aboriginal culture.

Section	Reference in Strategy	WSLHD, CPH comment and recommendation
2.3 Principles of the new SEPP	2.3. p.14-19	<p>CPH commend the inclusion of health in the principles of the new SEPP.</p> <ul style="list-style-type: none"> • The guiding principles will assist with improving the health and wellbeing of our population through contributing to addressing several built and environmental challenges which impact health, including; urban heat/climate change, limited access to quality green open space, low rates of active travel, high rates of car dependency and low quality and location of higher density housing. <p>CPH recommend that consideration is given to minimum standards that facilitate improved outcomes and provide clarity on requirements to meet these principles.</p> <p>CPH recommend that inclusion of equity, comfortability and accessibility in public spaces are addressed in these principles. Creating safe, inclusive, and empowering places for women, child-friendly and universally accessible design will benefit not only people with a disability, children, and older people but the community as a whole.</p>
Part 3: Key components of the new SEPP (Design and Place)		
3.2 Design and place considerations	3.2.2. Table 1, Item 4, Local living p. 28	<p>CPH recommend that the proposed considerations include short walking distances (in metres) to promote physical activity, active travel and social cohesion, specifically:</p> <ul style="list-style-type: none"> • All housing in urban areas of new precincts is within: <ul style="list-style-type: none"> ○ 400-500m (a five-minute walk) to local shops, public open space, schools, community facilities, healthy food outlets such as supermarkets.⁶ ○ 800m of a train station and/or 400 of a bus stop.⁶ • All new higher density developments are within: <ul style="list-style-type: none"> ○ 200m of quality open space.⁷
Part 6: Planning pathways		
6.1 Development Under Part 4 of the EP&A Act and 6.2 Development Under Part 5 of the EP&A Act	6.1 and 6.2, p. 41	<p>CPH recommend that population health impacts are reviewed through the development planning process.</p> <ul style="list-style-type: none"> • The Healthy Built Environment Checklist tool is designed for this purpose and will identify features of the built environment where population health needs can be influenced. The recommendations in this tool are supported by evidence.⁶

Section	Reference in Strategy	WSLHD, CPH comment and recommendation
Appendices		
A: Proposed amendments to the Apartment Design Guide and SEPP 65	A.2.2 Urban design and site planning	
	TA5.2 Landscape and greening, p. A14	<p>CPH commend the proposed changes to increasing min. deep soil zones which will assist with increasing the tree canopy and in turn reducing urban heat.</p> <ul style="list-style-type: none"> • Tree canopy cover is essential to mitigate the health impacts of heat. Western Sydney exhibits greater exposure and vulnerability to heat; with a greater number of extreme heat days compared with other areas of Sydney.
	TA5.3 Building form and 4. Building separation, p. A14	<p>CPH commend the changes to building form and separation which will improve urban and public amenity, open space, sky view, solar access, in addition to, residential amenity, cross ventilation and natural light.</p> <ul style="list-style-type: none"> • Provision of adequate air flow, ventilation and solar access were recommendations made within the HHD4K study. When not done well, exposure to poor air quality, a lack of ventilation and poor solar access can lead to poor health outcomes for children and contribute to chronic stress for parents.⁵
	TA5.8 Car parking, p. A15	<p>CPH commend the proposed changes to car parking in areas of higher density.</p> <ul style="list-style-type: none"> • By reducing the car parking requirements of dwellings, more sustainable forms of transport become favourable and result in an increase in the number of people walking and cycling. • To disincentive car use and encourage active travel, infrastructure provisions such as access to public transport, footpaths, cycleways, shade trees, drinking water and wayfinding signage would enhance the amenity and accessibility of streetscapes by encouraging people onto the streets and providing an amenity for social interaction.⁸ <p>CPH recommend that proposed changes to car parking consider:</p> <ul style="list-style-type: none"> • The parking needs of families with young children. • The parking needs of community health services and other service providers who provide home visits to clients living in apartments.
TA5.9 Bicycle parking and mobility storage, p. A16	<p>CPH commend the proposed changes to bicycle parking and storage.</p> <ul style="list-style-type: none"> • These changes will assist with encouraging active travel, recreational activity and reducing car use. 	

Section	Reference in Strategy	WSLHD, CPH comment and recommendation
	A.2.3 Residential amenity	
	TA6.1 Solar access, p. A19	<p>CPH commend the proposed changes to improving solar access.</p> <ul style="list-style-type: none"> Adequate natural lighting was identified within the HHD4K study as beneficial for improving liveability and improving the safety and supervision of children.⁵
	TA6.2 Natural ventilation, p. A19	<p>CPH commend the proposed changes to natural ventilation.</p> <p>CPH recommend that changes to natural ventilation include consideration of whether the source is from windows or doors. We recommend ensuring windows are provided within living areas of apartments.</p> <ul style="list-style-type: none"> Parents within the HHD4K study raised concerns of a lack of natural ventilation due to no windows within living areas. Parents identified not being able to keep balcony doors open due to safety concerns for their young children.⁵
	TA6.4 Apartment size, p. A20	<p>CPH recommend changes to apartment size are made to encourage more 3 bedroom 'family units' with larger living areas are provided in new developments.</p> <ul style="list-style-type: none"> With the predicted population increases in western Sydney, in some parts the household type 'family with children' is projected to almost double by 2041, the proportion of children living in apartments is likely to increase.⁵
	TA6.5 Apartment layout, p. A20	<p>CPH commend the proposed changes to apartment layout which require an increase in the size of bedrooms as this will improve liveability for families with children.</p>
	TA6.7 Private open space, p. A20	<p>CPH recommend increasing the total area of private open space and balconies to ensure it is a useable space for children.</p> <ul style="list-style-type: none"> Parents within the HHD4K study identified that the size of their balcony was too small to allow children to play on it.⁵ As a result, increasing the size of private open space will improve the quality of life of families and the development of children growing up in apartments.
	TA6.8 Storage, p. A21	<p>CPH recommend considerations to storage requirements are made to ensure storage is usable and sufficient for families.</p> <ul style="list-style-type: none"> Parents within the HHD4K study identified the need for ample storage for childhood equipment such as prams, bikes, scooters and toys within their apartment, and also within the building e.g. foyer or common areas.⁵
	TA6.9 External noise and pollution, p. A21	<p>CPH commend the proposed changes to external noise and pollution.</p> <ul style="list-style-type: none"> Consideration to the location of apartment buildings is essential, ensuring adequate setbacks from main roads and

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		<p>soundproofing from external noise sources for apartments facing roads and in high use areas is required.</p> <ul style="list-style-type: none"> Chronic noise exposure can be detrimental to children’s reading acquisition, cognitive skill development, and behaviour.⁵
	<p>TA6.10 Acoustic separation, p. A21</p>	<p>CPH commend the proposed changes to acoustic separation.</p> <ul style="list-style-type: none"> These measures will improve the quality of life of families with children living in apartments. Adequate soundproofing between apartments is essential for minimising the negative health impacts of noise on children.⁵ <p>CPH recommend flooring options are considered for acoustic separation and soundproofing measures.</p> <ul style="list-style-type: none"> Flooring concerns were raised by parents within the HHD4K study, specifically, hygiene and health concerns (rashes, dust mites and asthma) relating to carpet.⁵
A.2.4 Common spaces and vertical circulation		
	<p>TA7.1 Communal open space, p. A23</p>	<p>CPH commend the proposed changes to communal open space that allow for more available space and catering to residential needs.</p> <p>CPH recommend that consideration is made for the increasing number of families with young children living in apartments in communal spaces, where play spaces, play equipment or infrastructure for children is included.</p> <ul style="list-style-type: none"> Visual and physical access to greenery is needed to encourage mental health and wellbeing and gross motor skill development.⁹ If done well, communal areas can provide green space for all residents in higher density, as well as facilitate and improve social connections, and contribute to real and perceived feelings of safety.¹⁰ International examples of child-friendly design show indoor communal areas, such as ‘playable corridors’ and common rooms, which can provide social opportunities, in addition to, green, open space or as an option for developments where green, open space could not be achieved.¹¹
	<p>TA7.4 Building access, common circulation and spaces, p. A23</p>	<p>CPH commend the proposed design criteria that improves universal access for all in apartment buildings.</p> <ul style="list-style-type: none"> The HHD4K study highlighted the need for considering pram access across all areas of the building (car park, communal areas, storage and apartment).⁵

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	TA7.4 Building access, common circulation and spaces, p. A23	<p>CPH commend the proposal for increasing provision of electric vehicle charging and car sharing.</p> <ul style="list-style-type: none"> In addition to environmental benefit, increased car sharing options will encourage multi-modal trips and increased active travel opportunities, helping people to meet their physical activity requirements.
A.2.5 Environmental performance		
	TA8.3 Heating and cooling infrastructure, p. A25	<p>CPH recommend reviewing the heat retention of infrastructure.</p> <ul style="list-style-type: none"> Building materials and surface materials of apartment developments that maintain a low heat retention and that do not reflect UV radiation are important considerations for reducing urban heat, as well as improving living conditions for residents.¹² Preventing heat stress is paramount to western Sydney which experiences unprecedented extreme heat days.¹³
B: Proposed New Urban Design Guide	B.1 The need for an Urban Design Guide	
	B.1 The need for an Urban Design Guide, p. B3-B5	<p>CPH commend the considerations made under the Urban Design Guide, particularly on how this can serve the community and deliver value.</p> <ul style="list-style-type: none"> As stated above, children act as an indicator species for the wider population and their needs are worth investing in. Designing with children in mind can have widespread and long-term benefits for all.^{3,4}
B.3 What the Urban Guide can cover		
	B.3.4, Part 2 Structure, p. B10	<p>CPH commend plans for green infrastructure.</p> <ul style="list-style-type: none"> Greening urban areas and increasing tree canopy, will help reduce urban heat, reduce the impacts of heat stress and improve the walkability of urban areas⁶. <p>CPH recommend developing a Child Friendly Neighbourhood Design Guideline, either as a separate supplementary document or as a chapter within the Urban Design Guide.</p> <ul style="list-style-type: none"> The incorporation of ‘playable spaces’¹⁴ in public domain areas that signal to children, this space is intended for their play, allow more opportunities for their development and growth. Outlining safe active travel routes for children. Involving children in the design process can help build a strong sense of community and belonging. <p>CPH recommend the <i>Healthy Streets</i> approach as a supportive resource to ensure people are at the centre of street design and function.</p>

Section	Reference in Strategy	WSLHD, CPH comment and recommendation
		<ul style="list-style-type: none"> This approach shows that good quality public spaces that focus on improving people’s health are the same principles that make public spaces economically and socially vibrant and environmentally sustainable¹⁵. <p>CPH recommend referencing/reviewing the new AustRoad Guide to Road Design 6A paths for Walking and Cycling, including detailed street and pathway guidelines within the Urban Design Guide.</p> <p>CPH recommend location and zoning of residential development consider best practice standards to contribute to the health and wellbeing of residents and the community:</p> <ul style="list-style-type: none"> Environmental health hazards of noise, air quality, risk of pedestrian injury from high volumes of traffic and heat stress. Adequate social infrastructure and green open space for residents in higher density dwellings located near transport corridors.

The Centre for Population Health is willing to provide additional evidence or information in relation to our comments if requested; and look forward to working with the DPIE to ensure that the vision of the *Design and Place SEPP EIE*, in maximising health and wellbeing outcomes is realised.

Yours sincerely,



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Reference List

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- ⁷ Greater Sydney Commission. Central City District Plan. Sydney, NSW: Greater Sydney Commission; 2018.
- ⁸ Heart Foundation. Healthy Active By Design Movement Networks [Internet]. National Heart Foundation of Australia; 2028 [cited 2019 Jul 28]. Available from: <http://www.healthyactivebydesign.com.au/design-features/movement-networks>.
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- ¹³ WSROC (2018) Turn Down the Heat: Strategy and Action Plan <https://wsroc.com.au/projects/project-turn-down-the-heat>.
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¹⁵ Saunders, L (2020) Healthy Streets Approach <https://healthystreets.com/>.