



Heart Foundation Victoria

***Delivering Melbourne's Newest Sustainable Communities:
Submission to the Growth Areas Authority***

July 2009

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The Heart Foundation

The Heart Foundation is a not-for-profit organisation committed to improving cardiovascular health in Australia. The Heart Foundation's vision is for Australians to have the best cardiovascular health in the world. Through its research, health promotion programs and policy development, the Heart Foundation promotes healthy public policy to support better health for all Australians.

Cardiovascular disease

Cardiovascular disease is the term used for a group of diseases including heart disease, stroke and blood vessel disease. It affects more than 3.7 million Australians and is this country's leading cause of death – more than 46,000 Australians die each year because of cardiovascular disease.

Recommendations

1. The Heart Foundation does not support the proposed expansion to Melbourne's Urban Growth Boundary. We believe that the focus of the Growth Areas Authority should shift towards urban consolidation and sustainable development. This can be achieved by:
 - Basing planning decisions on the principles established in *Melbourne 2030*.
 - Ensuring that Melbourne's existing suburbs are well serviced by public transport and other health promoting infrastructure.
 - Embedding healthy urban planning principles into the planning and development process. The Heart Foundation's *Healthy by Design* serves as a helpful guide.
 - Protecting high quality agricultural land on Melbourne's fringe.
 - Requiring the provision of public transport before other land use development can occur. All new development should be within 400-800 metres of existing public transport.

2. The Heart Foundation recommends that the Victorian Government undertake a Health Impact Assessment before construction of the OMR/E6 Transport Corridor. A Health Impact Assessment should:
 - Be undertaken by a group/organisation with a strong track record in the assessment process.
 - Involve extensive consultations with communities who may be affected by the OMR/E6 Transport Corridor.
 - Make recommendations that identify the potential direct and indirect health impacts of the OMR/E6 Transport Corridor.
 - Assess options for the construction of the proposed rail line without a co-located road/freeway.

Introduction

The Heart Foundation (Victoria) is pleased to respond to *Delivering Melbourne's Newest Sustainable Communities* (the consultation report).¹ The Heart Foundation's interest in planning and urban design, and our reason for responding to the report, is less to do with what the Minister for Planning recently called "cultural snobbery and NIMBY-ism dressed up as public debate"² and more to do with the impact on health of the proposed changes.

Consultation period

Before the Heart Foundation comments on the proposals outlined in the report, it is necessary to express our disappointment that a period of only one month has been set aside to provide feedback to the Growth Areas Authority.³ As the consultation report is accompanied by three related reports and 10 supporting documents, we believe the capacity of interested parties to provide comprehensive feedback is undermined by the volume and complexity of the information provided and the lack of time in which to respond.

The health impact of proposed change

Delivering Melbourne's Newest Sustainable Communities proposes a number of long-term changes to Melbourne's metropolitan landscape that have the potential to alter this city's capacity to meet modern challenges – these include population growth, housing and mortgage stress, social isolation, climate change and peak oil – which are recognised as being important (albeit in some cases emerging) determinants of population health.^{4,5,6}

There is strong evidence to show the link between urban form and health and the many negative health effects associated with urban sprawl. People who live in sprawling suburbs are more likely to be physically inactive, be overweight and obese, have less access to public transport, be socially isolated, and experience higher rates of blood pressure.^{7,8,9} Many of these are risk factors for chronic disease, including cardiovascular disease.^{10,11}

The Heart Foundation believes that urban environments should be planned to support and promote health, a point we recently reinforced in our submission¹² to the review of Victoria's *Planning and Environment Act 1987*. Healthy and liveable environments provide opportunities for citizens, irrespective of where they live, to enjoy equal access to local community facilities, employment, transport, housing and public spaces.¹³

The rationale for planning for health was examined in a 2003 editorial in the *American Journal of Public Health*, which argued:¹⁴

"Public health has traditionally addressed the built environment to tackle specific health issues such as sanitation, lead paint, workplace safety, fire codes, and access for persons with disability. We now realize that how we design the built environment may hold tremendous potential for addressing many of the nation's greatest current public health concerns, including obesity, cardiovascular disease, diabetes, asthma, injury, depression, violence, and social inequalities."

This view is expressed in the Heart Foundation's *Healthy by Design: a planner's guide to environments for active living*¹⁵ resource, which is used by local

governments to embed healthy urban planning principles into Council policy and practice. *Healthy by Design* guides planners to consider the health impacts of their work and outlines seven key design considerations – walking and cycling routes; streets; local destinations; open space; public transport; seating, signage, lighting, fencing and walls; and fostering community spirit – for the development of urban environments that support communities to lead active and healthy lives.

This submission

Delivering Melbourne's Newest Sustainable Communities calls for public comment on four proposals:

- Melbourne's revised Urban Growth Boundary;
- An alignment for the Regional Rail Link;
- An alignment for the Outer Metropolitan Ring/E6 Transport Corridor; and
- The boundaries and management of proposed grassland reserves in Melbourne's west.

Rather than respond to each of these proposals, the Heart Foundation's submission focuses primarily on Melbourne's revised Urban Growth Boundary, and also provides comment on the proposed alignment for the Outer Metropolitan Ring/E6 Transport Corridor. Our response is guided by the potential health impact these changes may bring.

Melbourne's revised Urban Growth Boundary

Melbourne is a sprawling city. It is generally accepted that urban sprawl, with an emphasis on development through outward expansion, has the potential to create unsustainable and unhealthy suburbs.^{16,17} Car-dependency and poor access to infrastructure and services are characteristics of many new growth area suburbs. It is for this and other reasons examined below that the Heart Foundation opposes any further expansion of the Urban Growth Boundary (UGB).

Further, proposing to extend the boundary before providing existing growth area communities with reasonable access to public transport and other basic infrastructure (such as access to local shops, services and employment opportunities) creates additional unmet demand and places further pressure on finite state and local government resources.

Population growth

The latest proposal to extend the UGB is based on demographic projections that forecast population growth at a faster rate than previously anticipated. *Victoria in Future 2008*¹⁸ and *Melbourne @ 5 Million*¹⁹ both show Victoria's population will rise from 5.1 million in 2006 to 7.4 million in 2036. Population growth in regional Victoria is expected to increase from 1.4 million in 2006 to 1.9 million in 2036. During the same time metropolitan Melbourne's population will rise from 3.7 million to 5.5 million.²⁰

While there is little doubt that population growth and demographic change have implications for the way Melbourne is planned, the decision to expand Melbourne's UGB is a further shift from the policy directions prescribed in *Melbourne 2030*. Released in 2002, *Melbourne 2030* was conceived as a framework to best manage Melbourne's long-term development. A key feature of *Melbourne 2030* was the recommendation for sustainable development that limited urban sprawl.²¹

The options: urban sprawl or increased housing densities

Melbourne 2030 noted that since the Second World War the average density of metropolitan Melbourne has been 14.9 persons per hectare. This is low by international standards and compares unfavourably to cities of a similar size and function to Melbourne. For example, the average density of Montreal and Toronto are 33.8 persons per hectare and 41.5 persons per hectare respectively.

In an effort to reduce urban sprawl, *Melbourne 2030* proposed an increase in Melbourne's average housing density. Achieving greater densities in established suburbs (including existing growth areas) is a practical alternative to creating additional urban sprawl. It also provides a range of benefits for the community, including increased opportunities to walk and/or cycle to local destinations such as shops and services (which in turn deliver health benefits through physical activity), and increased viability of local shops and services (including public transport) due to the greater population base.

Based on international practice as described above, as well as Victorian-based research, the Heart Foundation recommends Victoria should aim for target of at least 25 dwellings per hectare. This would help to deliver communities that are truly sustainable and go a long way to meeting the housing demands of a rapidly growing

population. (The basis for the minimum 25 dwellings per hectare target is described in detail in the Appendix.)

Mandating higher densities in growth areas, as well as in established suburbs, would significantly reduce the amount of land required for urban development and reduce the perceived need to expand Melbourne's boundaries. It would also deliver significant cost savings, as identified in a recent article by Rob Adams, citing research from Curtin University. The research found that the cost of infill development was \$309 million for every 1,000 dwellings compared to \$653 million for fringe development for the same number of dwellings. Additional costs associated with fringe development included: hard infrastructure such as power and water, increased transport and health costs, and greenhouse gas emissions.²²

The Heart Foundation believes that in order to shift the balance from a reliance on greenfield development and towards urban consolidation, the mandate of the Growth Areas Authority should be broadened to consider planning across metropolitan Melbourne, instead of focusing solely on growth areas and as a result, establishing a powerful advocate for outward growth.

Such a shift would also assist in meeting the *Melbourne 2030* proposal for a reduction in the commencement of new dwellings in greenfield sites from 38% to 22% (and averaging 31% over the period 2001 to 2030²³). Progress against this target shows it has not been achieved, with an increase in the proportion of household growth occurring through greenfield development. The Melbourne 2030 Audit found that between 2001 and 2006, this figure stood at 48.3%.²³

Recent projections suggest this trend will continue unless the principle of urban consolidation is actively pursued. Over the next 20 years Melbourne will need to accommodate an additional 600,000 dwellings. *Delivering Melbourne's Newest Sustainable Communities* proposes that 316,000 dwellings (53%) will be accommodated in Melbourne's established areas while the balance of 284,000 dwellings (47%) will be accommodated in Melbourne's UGB.¹ The Heart Foundation recommends this housing stock be provided through urban consolidation, densification, and minimal outward expansion.

Provision of public transport infrastructure to new communities

The proposed expansion of the UGB is based on a number of planning principles outlined on page 17 of the consultation report. These include:

- The majority of new development is within approximately 3 kilometres of high capacity public transport (existing or planned).
- The pattern of development would allow for efficient public transport networks at a sub-regional level.

When considered in relation to the principles of healthy urban planning, which are described in the Heart Foundation resource *Healthy by Design*,¹⁵ there are a number of fundamental problems with the principles described on page 17 of the consultation report. They are also problematic when examined alongside a framework of urban development that suggests the current proposals are delivering 'Melbourne's newest sustainable communities'.

The Heart Foundation's first concern is the proposal to locate public transport 3 kilometres from new development. This effectively equates to the provision of inaccessible transport services for the majority of residents in these new

communities. Planning principles for the creation of neighbourhoods that are socially, economically and environmentally sustainable suggest that public transport infrastructure should be located within walking distance from dwellings and businesses.

The concept of walking distance will vary according to people's differing fitness levels and needs, but usually ranges from 400 to 800 metres. These distances require the delivery of efficient public transport networks at a *neighbourhood*, rather than a sub-regional level. Distances of 3 kilometres between dwellings and public transport create a reliance on cars, as the majority of the community would not choose to walk for 40 to 50 minutes to access public transport services. This creates significant problems for people who cannot or choose not to drive, resulting in social isolation and the restriction of opportunities for participation in the workforce and community life.[‡]

The location of public transport stops/stations within walking distance to dwellings and businesses also delivers important health benefits, as people are able to undertake daily physical activity as a component of their daily transport activities. Given that almost 40% of Victorians do not meet the recommended level of physical activity for good health,²⁴ any opportunity to build walking into daily activities should be pursued. Physical activity is an important protective factor against a range of chronic diseases, including cardiovascular disease.²⁵

By failing to provide communities living in growth areas with the opportunities to access public transport services, and the choice to do so by active transport modes (walking and cycling), the Victorian Government is creating the conditions that contribute to health inequalities. This is in direct opposition to its own social policy action plan, *A Fairer Victoria 2009*.²⁶ Growth area communities are, by definition, part of metropolitan Melbourne should have comparable access to basic infrastructure and services as those living in established suburbs.

There is still considerable progress to be made to provide equitable access to public transport and opportunities for active transport in Melbourne's outer suburbs, including existing growth area communities. The Heart Foundation believes that the provision of public transport and other social and community infrastructure should be a requirement of all new developments. Construction should take place before other land use development can occur. Many communities are waiting for proposed infrastructure such as rail extensions and train stations many years after moving into new developments. The proposal to yet again expand Melbourne's UGB will only exacerbate this problem and further compromise the Victorian Government's ability to deliver necessary infrastructure to existing suburbs. Indeed, the consultation report reaffirms this by noting:

"It may also be necessary for additional infrastructure projects to be initiated that go beyond current commitments to deliver good transport outcomes for new communities in the longer term. The extent and scale of future infrastructure projects will be determined as part of preparing the Growth Area Framework Plans." (p. 25)

[‡] Further information about the relationship between public transport and social inclusion/social exclusion can be found on the United Kingdom's Department of Transport <http://www.dft.gov.uk/pgr/inclusion/se/social'exclusionandtheprovisi3263> and a report by the Imperial College, Mott MacDonald, and the University of Leeds <http://www.dft.gov.uk/pgr/inclusion/sitransportaspects.pdf>

The notion that new infrastructure projects (beyond current commitments) are required suggests a lack of forward planning for a proposal of this significance. If the extension of Melbourne's UGB proceeds as proposed, existing delays in the provision of infrastructure will worsen and a proportion of 'planned' services may never be delivered due to a lack of committed funding. This would repeat past mistakes and risk poor health and social outcomes that are, in part, determined by poorly planned suburbs.

Protecting quality agricultural land

The competing objectives of protecting agricultural areas close to Melbourne versus using the land for Melbourne's outward expansion, particularly in the south-east investigation area, are acknowledged in the consultation report. The Heart Foundation is concerned that priority has been given to outward expansion.

The land referred to as the south-east investigation area is the Casey-Cardinia Growth Area. It contains high quality land with a combination of good soil, a secure supply of recycled water and access to Melbourne markets, providing a competitive advantage for agricultural production. This area is one of two significant vegetable growing areas in close proximity to Melbourne. As well as creating approximately 550 jobs in the City of Casey and contributing significantly to the local economy, the agricultural activity is an important source of locally-grown fresh food for Melbourne's population.²⁷

The Heart Foundation places great importance on ensuring that healthy food choices, particularly fruit and vegetables, are readily available to all members of the Victorian community. Expansion of the UGB, as proposed in the City of Casey, will reduce the amount of locally-grown produce available in Melbourne. The protection of land which provides an important fresh food source now and into the future (particularly given its drought proof infrastructure) has been identified as a priority by the Council. We believe that this prioritisation should be reflected at a state level in relation to agricultural land across all growth areas.

The consideration given to biodiversity during the investigation process appears to be much greater than that given to agricultural value. In both cases, once a decision is made and urban development is allowed, this land will be lost to other uses forever. We believe that insufficient investigation has been conducted into the potential threat to food security from the loss of quality agricultural land to urban development, and suggest that further research must be undertaken to ensure a fully informed and responsible planning decision is made.

Further, if the extension proceeds as proposed, it will create great uncertainty for all agricultural uses near the UGB given it will be the second change in 10 years. People could reasonably assume that it will only be a matter of time before the boundary is pushed out again, discouraging further investment in important farming activity.

Recommendations

The Heart Foundation does not support the proposed expansion to Melbourne's Urban Growth Boundary. We believe that the focus of the Growth Areas Authority should shift towards urban consolidation and sustainable development. This can be achieved by:

- Basing planning decisions on the principles established in *Melbourne 2030*.

- Ensuring that Melbourne's existing suburbs are well serviced by public transport and other health promoting infrastructure.
- Embedding healthy urban planning principles into the planning and development process. The Heart Foundation's *Healthy by Design* serves as a helpful guide.
- Protecting high quality agricultural land on Melbourne's fringe.
- Requiring the provision of public transport before other land use development can occur. All new development should be within 400-800 metres of existing public transport.

An alignment for the Outer Metropolitan Ring/E6 Transport Corridor

The proposed Outer Metropolitan Ring/E6 Transport Corridor (OMR/E6) has the potential to significantly alter Melbourne's urban landscape. If delivered as planned – 93kms in length, capable of being expanded to four lanes in each direction and wide enough for four railway tracks in the median – the impact on the urban environment, Melbourne's transport system (including demand for car travel) and the amenity of surrounding areas, which will effectively be divided by the OMR/E6, will be considerable.

Although the OMR/E6 proposal includes provision for road and rail, Melbourne's recent history of road/freeway expansion gives the Heart Foundation pause to step back and consider a fundamental question: does Melbourne need another freeway? The Eastern Freeway (built without the Doncaster rail line), the Western Ring Road, Citylink and Eastlink are four recent examples of a preference by government for road over rail.

Health Impact Assessment

The Heart Foundation believes that a compelling social, economic and environmental case should be made before construction of the OMR/E6 Transport Corridor. Construction is not planned to commence before 2020, allowing adequate time to achieve this. We also believe that the impact on health should be carefully considered. One way to achieve this is by undertaking a Health Impact Assessment to examine the potential for health gain or loss from the OMR/E6 Transport Corridor. Health Impact Assessment is defined by the World Health Organization and the European Centre for Health Policy as:²⁸

“A combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.”

A Health Impact Assessment should be undertaken during the planning stages of the OMR/E6 Transport Corridor and before the commencement of construction. It would assess direct impacts, such as noise and pollution, and indirect impacts including the impact on the local job market, access to local shops and other amenities, and the availability of public spaces.^{29,30}

A Health Impact Assessment would draw together the evidence of the impact on health and sustainability and would also be an opportunity to identify requirements for health promoting infrastructure – such as cycling lanes, walking paths and interventions to reduce noise and speed – that should be included in the plan.³¹

As a principle of health urban design, the Heart Foundation supports the provision of additional public transport. A Health Impact Assessment would be an opportunity to examine this in further detail and investigate the efficacy of constructing a new rail corridor without a co-located road/freeway. Amongst other considerations, this could include an assessment of the relative construction costs³² and greenhouse emissions for road and rail.³³

Recommendation

The Heart Foundation recommends that the Victorian Government undertake a Health Impact Assessment before construction of the OMR/E6 Transport Corridor. A Health Impact Assessment should:

- Be undertaken by a group/organisation with a strong track record in the assessment process.
- Involve extensive consultations with communities who may be affected by the OMR/E6 Transport Corridor.
- Make recommendations that identify the potential direct and indirect health impacts of the OMR/E6 Transport Corridor.
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Appendix

The Heart Foundation's recommendation that Victoria should aim for target of at least 25 dwellings per hectare is based on the following:³⁴

- A corner store/milk bar requires a minimum of 900-1000 dwellings to support its viability. If these are not within convenient walking distance (for convenience shopping etc), the tendency is for people to drive past it to a larger centre.
- A 400m (5 minute walk) circle is 50ha in area.
- Subtract 32% (metropolitan average) for non-residential land (roads, parks, schools, activity centre etc.)
- This leaves 34ha for residential development, within 5 minutes walk of the centre.
- At 15 dw/ha, this equates to 510 dwellings, roughly half of what is required (of the 900-1000 minimum).
- Therefore half the core catchment of the centre is beyond 5 minutes walk, and therefore not a convenient walk from home.
- To get 950 dwellings within 5 minutes walk, the AVERAGE density would need to be around 27 dw/ha. This would still accommodate plenty of normal detached houses etc, but also some terraces, townhouses and so on.

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