Sheridan Dudley  
District Commissioner – South West  
engagement@gsc.nsw.gov.au  
Greater Sydney Commission  
PO Box 257  
Parramatta NSW 2124

Dear Ms Dudley

DRAFT South West District Plan – response

The South Western Sydney Local Health District (SWSLHD) with support from NSW Health Infrastructure welcomes the opportunity to comment on the Greater Sydney Commission’s South West District Plan and the companion document Towards our Greater Sydney 2056.

Firstly, we congratulate the efforts of the Commissioners, District Commissioner and the technical staff for drafting and delivering the District Plans. SWSLHD appreciates being involved early in the process and looks forward to continue collaborative working with the Commission.

The vision of SWSLHD is ‘Leading care, healthier communities’. We aim to provide excellent healthcare services and protect and promote the health of the local population. We recognise the importance of good planning to both the provision of high quality and accessible health care and the health of our community and are keen to work with the Greater Sydney Commission to progress this.

The directions being set in the District Plans and Towards Our Greater Sydney 2056 are being used to guide the long term planning being carried out by SWSLHD and NSW Health Infrastructure. Ongoing engagement to plan for health service provision in the major growth areas of the south west and MacArthur region will be a key focus for SWSLHD.

Liverpool Health and Education Precinct

Liverpool Health and Education Precinct Steering Committee was established in partnership with the South West Sydney Local Health District (SWSLHD), Western Sydney Business Chamber (WSBC), and Liverpool City Council to increase the opportunity for health, research and education investment around the hospital.

The intention of this new vision is to leverage the location and capability of Liverpool Hospital and Liverpool’s river city identity to make Liverpool a vibrant economic, health and education powerhouse.

South Western Sydney Local Health District acknowledges the traditional owners of the land.
Engaging with the Greater Sydney Commission and strengthening governance arrangements, vision, and long term objectives will assist in coordinating key work streams to deliver the Liverpool health and education super precinct.

Key Outcomes Sought

SWLHD and NSW Health Infrastructure supports the Liverpool Health and Education Precinct Steering Committee request for involvement of Greater Sydney Commission in a formalised Collaboration Area and the development of a master plan and implementation plans to progress development of the precinct.

Campbelltown Health and Medical University City

Campbelltown Hospital has undergone recent expansion and benefits from a strong relationship with the University of Western Sydney. Recent partnerships between the NSW Government and University have delivered the Macarthur Clinical School at the hospital.

Future expansion of the hospital is being planned and expected to provide significant additional clinical services. Though funding has not been committed to this project at this stage, a decision on the project is expected in the near future.

A health and education precinct at Campbelltown has been proposed with Campbelltown city council leading the consultation for this proposed initiative. It is considered that such an initiative is vital for the continued development of the Macarthur region and further creating employment and improving the liveability of the region.

Key Outcomes Sought

SWLHD and NSW Health Infrastructure supports the proposed Campbelltown Health and Education Precinct and request for involvement of Greater Sydney Commission to support the formation of the precinct and provide guidance to progress development of the precinct. This could take the form of a formalised Collaboration Area and the development of a master plan and implementation plans.

Health Populations and Land Use and Transport Planning

The significant projected growth in NSW and in particular the Western Sydney region and the new Western City needs to be carefully planned and managed to ensure it contributes positively to the health of our communities and does not further perpetuate some of the health inequalities that currently exist across the State, and in particular in SWSLHD. Noting that there are currently four Priority Growth Regions and the proposed Western Sydney Airport within the boundaries of SWSLHD, the importance of a considered approach to urban development is vital. Well-designed environments have the potential to mitigate key health risks and support individuals to have better health outcomes. Poorly designed environments and infrastructure directly and indirectly impact on the physiological, psychological and social wellbeing of communities. Ensuring that health facilities are located close to transport hubs is crucial to this design process.
Forecast population growth also needs to address growth in demand for health services and facilities. Safeguarding of sites for provision of health facilities in these areas should be identified in plans at the District and Metropolitan level.

**Key Outcomes Sought**

- SWSLHD and NSW Health Infrastructure seek active participation in the review of the Plan for Growing Sydney and Future Transport.

- SWSLHD and NSW Health Infrastructure seek support from the Greater Sydney Commission to assist with ensuring the safeguarding of sites for provision of health facilities within the Priority Growth Areas. Sites include Leppington, Oran Park and Wilton – New Town as well as a potential future hospital in Bringelly.

- SWSLHD and NSW Health Infrastructure request the Greater Sydney Commission note the considerable feedback provided on liveability and sustainability issues as they relate to healthy population outlined in Appendix 1. In particular note SWSLHD concerns about the operationalisation of goals and aspirations articulated around walkability, cycling, open public and green space and controls on the pattern of development. Health could useful be listed as a partner agency for a number of the actions.

SWSLHD looks forward to being involved in an ongoing dialogue with the Greater Sydney Commission and its partners as it finalises and implements the District Plans and undertakes a review of the regional plan – A Plan for Growing Sydney.

If you would like to discuss our submission further please contact Simone Proft, Manager Planning Unit for enquires about health infrastructure planning and Dr Stephen Conaty, Director Population Health for enquires about population health on [contact information]

Again, SWSLHD congratulates you on your efforts to date and reiterates its commitment to work alongside Greater Sydney Commission in this process.

Regards,

Amanda Larkin
Chief Executive

Date: 3/4/1

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Appendix 1: Detailed Feedback on South Western Sydney Local Health District on the Greater Sydney Commission Draft South West Sydney District Plan

Further general comments:

Health is not listed as a key outcome or deliverable in the document. We generally support the productivity, liveability and sustainability framework. However, although health is referred to as an important consideration, it is not listed as a key outcome or deliverable in the document. In the recent NSW review of the planning system, health was acknowledged as a separate and key outcome of planning, and this should be reflected in this document. Planning for a thriving and resilient city must include health as a key outcome.

SWSLHD supports the use of a Liveability Framework with clearly articulated principles, to guide planning and to ensure that physical and mental wellbeing are provided for. We note that whilst health is assumed to be one of the goals for the liveability framework, it is not mentioned as a specific liveability outcome.

There is a need for more detailed strategies and information about the ways in which the strategies will be operationalised and monitored. We support the principle of using a dashboard to monitor progress; however, some of the indicators developed by the GSC require further thought and also need to include other aspects of health and liveability. The document cites many guidelines and the use of incentives for developers. There will be a need to monitor compliance to ensure the realisation of some of the more aspirational aims outlined in the document. For example, the document generally encourages construction of bike paths but there is no articulated goal and no measurable outcomes that organisations can be held to accountable for.

There is a welcome focus on walking/walkability, cycling and the need to provide connecting routes to public transport and community destinations. We support proposals for flexible and shared use of facilities and open spaces, for example using school facilities out of school hours; shared and multiple use of open spaces. We also support the focus on housing diversity, appropriate housing through the life cycle, housing affordability, and planning for jobs creation.

We would like to see Health more explicitly named as a partner in actions. For example under Liveability Action 12: Develop guidelines for safe and healthy built environments.

The plans for a new Western City need to be better articulated. The master planning process for new Western City should be outlined. The elements at present do not include a commitment to new residential and city building that will constitute the core of a new Western City although there are suggestions (e.g. Productivity Action 4) that Leppington will become the core. Health infrastructure planning will critically depend on this articulation.

The plan needs to be clearer about proposed patterns of development. We note that P9 states “Develop a threshold for greenfield dwelling numbers based on transport provision”. In general we support stronger controls over the pattern of development to encourage denser development closer to public transport hubs and reduce health problems associated with urban sprawl and car dependence in SW Sydney.
We strongly encourage the use and implementation of NSW Health Healthy Development Checklist in order to ensure other broad health considerations are included in all urban planning and designs (A pdf and an interactive copy of the Checklist can be found at: http://www.swshd.nsw.gov.au/populationhealth/PH_environments/resources.html). Rather than providing incentives to planning authorities that take these into account, they should instead become standard considerations and inclusions for any planned urban development.

Greater emphasis on public open and green space. While the strong focus on walking and cycling is welcome, there is not enough attention given to supportive environments for a wide range of physical activity. With a rapidly growing population and much higher levels of apartment dwelling, there will be a growing dependence on public open space and green space for physical recreation and activity. This will include regional and local sports facilities and also multiple options for non-organised physical activity. Once available land is built over it will not be possible to retrofit with open spaces. We recommend liaison with other District plans over provision of regional and larger scale sporting and open space facilities, and to take account of use by communities outside the geographical area of the SWS Region. One contributor to the overweight and obesity problem is under-participation in physical activity. It is probable that efforts to address overweight (a NSW Premier’s Priority) will result in increased demand for open space and a variety of physical activity opportunities.

We are concerned about differences in population projections. We acknowledge the difficulty in accurately projecting population growth. For example, projections cited in A Plan for Growing Sydney in 2014 have already been exceeded by 9%, less than two years later. It is unclear why there has been such a big change in such a short time, and this creates some further uncertainty about the validity of the current projections. This document cites a ‘middle range’ growth of 725,000 new dwellings across Greater Sydney, but acknowledges the highest potential growth being closer to 830,000 (p.99).

The following specific ‘Action Items’ are also supported as they improve the health of populations in SWS:

- IM1-Align land use planning and infrastructure planning - It is very positive that NSW Health has been specifically listed as a partner for this Action Item.
- P2 and P4: Economic development – planning for aerotropolis and Western Sydney Airport which will generate employment
- P10: Encourage and support the use of public transport patronage
- L12: Developing guidelines for safe and healthy built environments
- L14: Develop a South West District sport and recreation participation strategy and sport and recreation facility plan
- L15: Support planning for shared spaces
- S2 S6: All actions stipulated relating to improved water quality and waterway health which may improve recreation water quality for uses such as swimming
- S9: Develop support tools and methodologies for local open space planning
- S12: Embed the NSW Climate Change Policy Framework into local planning decisions
- S15: Mitigation of the heat island effect will also support the NSW Health ‘Beat the Heat’ Strategy
- S16: Reducing exposure to air and noise pollution will improve health
- S17: Identify and map potential high impact areas for noise and air pollution to improve health

The following more detailed comments are made regarding the draft plan:

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<tr>
<td>Page 4: Productivity action table point P4</td>
<td>• Consider another Action Item as follows: Encourage active transport networks linking residential areas with commercial centres and job centres. This will encourage incidental exercise to reduce weight gain and obesity.</td>
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<td>Page 6: Liveability Priorities and Actions</td>
<td>• Suggest including ‘Provide adequate and high quality open space’ under the overarching priorities, as open space has such a critical role to play in prevention/minimising of chronic diseases such as diabetes. (1)</td>
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| Page 7: Liveability Actions | • For L12: Develop guidelines for safe and healthy built environments: NSW Health should be listed as a partner.  
• For L14: Develop a South West District sport and recreation participation strategy and sport and recreation facility plan: NSW Health should be listed as a partner.  
• L19: SWSLHD has an indirect role with planning cemeteries and crematoria. |
| Page 9: Sustainability Actions | • Consider to add another Action Item as follows: Support land use for local food production. The outcome is locally grown fresh foods and reduced emissions resulting from long distance transportation of foods to South West Sydney. |
| P 18 1.2.4 Noise And S16 p. 157 | • Noise should be included on the list of environmental reporting for Greater Sydney Dashboard.  
• Elevated noise levels have emerged as a significant community concern for those living in close proximity to the proposed airport, according to a 2016 Health Impact Assessment conducted by CHETRE on behalf of SWSLHD Population Health. (2) Noise mitigation measures and monitoring will be necessary, in order to further support the notion of Western Sydney being a healthy liveable area.  
• We are pleased to see the commitment (Action S16) to update the Development Near Rail Corridors and Busy Roads – Interim Guideline which is called into the current Infrastructure SEPP. Health was an important contributor to the health-based noise and air pollution goals within this document and should be listed as a partner agency. |
<p>| P32 and 33 SWS – Emerging Economy | • Statistics show (p32) that SW Sydney currently has 16% of the Greater Sydney’s population but only has 10% of all jobs across GS and a smaller proportion of the population compared to NSW is tertiary educated and a smaller proportion has ‘knowledge intense’ jobs (16% compared to NSW 32% - p33). This raises concern about the extent to which the new ‘smart’ jobs will be accessible by local residents, especially in light of TAFE fees now putting TAFE out of reach of many vulnerable community members. Clear strategies need to be identified and prioritised to ensure that the jobs will go to local people and that |</p>
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<td>P37 Access to Jobs</td>
<td>• The document reports the low use of public transport in this area (10% compared to 20% for Greater Sydney) Well planned, reliable and frequent public transport has many health and environmental benefits and should be supported, and promoted rather than relying on roads alone.</td>
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<td>• In view of relatively low levels of use of public transport, there needs to be a range of strategies to develop public transport options and to encourage more use of public transport. It may be useful to develop goals for the proportion of travel to be undertaken by public transport.</td>
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<td>P 40</td>
<td>• There is concern that the job types mentioned in the City Deal (to attract investment to stimulate the growth of knowledge-intensive, freight, logistics and tourism jobs and to drive better social and economic outcomes for... vulnerable groups) may not match the skill-sets of communities including refugee and culturally and linguistically diverse communities. There will also need to be greater investment in training to ensure people are up-skilled and able to access these new job in their immediate communities.</td>
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<td>P 46 Productivity Priority 1</td>
<td>• Suggest including open space under Productivity Priority one; sufficient open space needs to be a key consideration.</td>
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<td>• There is concern that the creation of Enterprise Corridors along major roads (such as Bringelly Rd) will create car-centric employment destinations. SW Sydney is already over-reliant on vehicles for getting around and such planning is setting the region up for long term car-dependence and future grid-locked roads. Key Enterprise destinations need to be made accessible by public transport and not necessarily along major road corridors, but along public transport corridors.</td>
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<td>P 49</td>
<td>• As part of improving District significant east-west and north-south connectivity, a priority action for the District should be the upgrade of the Cambridge Rd Causeway at Glenfield to a bridge with pedestrian/cycle access. With projected increases in the population density of the northern Campbelltown LGA suburbs east of the T2 rail line, there is an even greater need to provide better east-west and north-south travel options. Construction of the Moorebank Intermodal will place greater pressure on the already dangerous causeway as large trucks utilise the Glenfield Waste Site.</td>
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<td>• Our vision is for south west Sydney to be less reliant on vehicles for transporting people to destinations and give greater emphasis to sustainable active travel options. To deliver increased accessibility and better transport connections our planning needs to Deliver (not just encourage) new walking and cycling infrastructure. We recommend inclusion of new walking and cycling infrastructure in all new or improved road works for state roads and main local roads, with off-road cycling infrastructure required for all new or reworked state roads. There needs to be greater commitment to the provision for cycling and walking connections to public transport hubs, enterprise corridors, employment destinations and residential areas.</td>
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<td>P 51 Action P10 Encourage use of public transport</td>
<td>- There will be a need to reserve land for commuter car parks.</td>
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<td>P 53 Employment</td>
<td>- It is a concern that development and population growth are expected by 2036, but the full development of the airport, with its attendant businesses, services and jobs, is not expected until 2056 – a potential lag of 20 years, risking a shortfall in employment opportunities in the area and continued long journeys to work.</td>
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<td>P 82 Liveability Framework</td>
<td>- Fresh food access is mentioned in this list, but this important issue has very little mention after this and should be expanded. Victorian researchers have suggested a goal of fresh food access within walking distance of all homes.</td>
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<td>P 87 4.2 Liveability priorities</td>
<td>- We strongly encourage the use and implementation of NSW Health Healthy Urban Development checklists in order to ensure other broad health considerations are included in all urban planning and designs. Rather than providing incentives to planning authorities that take these into account, they should instead become standard considerations and inclusions for any planned urban development. This is to ensure that healthy urban development is consistently taken into consideration and accommodated.</td>
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| P 89 | - We support a call for increasing the target for affordable rental housing to 15 percent of total floor areas of privately owned land and 30 percent of government owned land.  
- As a region with a high level of low income households and frequent overcrowding, South West Sydney has a growing need for good quality affordable housing and affordable rental accommodation. We support the suggestion that SEPP 70 be amended and all local government areas in greater Sydney be recognised as needing affordable housing. |
| Page 104: Affordable rental housing | - It will be important to have affordable accommodation for health care workers in the area where they live close to the hospital and community health centres. |
| P 109 4.6.1 Provide design-led planning | - Add to the list describing role of design in cities and towns: ‘Promoting and maintaining health’ |
| P 111 4.6.2 | - Paragraph 2, line 5: after ‘cycle rather than drive’ add ‘and support an active life and physical activity participation’ |
| P111 Liveability priority 5 | - Change the word ‘facilitate’ in the first line to ‘prioritise’ safe and healthy built environments  
- Crime Prevention through Environmental Design (CPTED) is highly recommended when considering safety and planning for all developments. This is to ensure the fear and incidence of crime is reduced, particularly when attempting to promote physical activity (incidental or intentional) and community cohesiveness.  
- There is also growing evidence that mixed use developments can potentially create neighbourhoods that are more walkable. Mixed use zoning and increasing population density may also increase opportunities for active transport, reduce need to travel great distances |
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<td>P112 4.6.3 Enhance walking and cycling connections</td>
<td>• We support the guidelines for developing more active travel, and attention paid to connectivity. In addition to providing walking and cycling paths, additional infrastructure will be needed to support walking and cycling, for example: seating, bike racks, shade, street lighting, and water stations.</td>
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<td>• To promote and increase walking and incidental exercise in neighbourhoods, healthy urban development guidelines recommend a distance of 400-500m between destinations as an acceptable measure of a comfortable walking distance (4,7,8). Consideration of this should be provided in all potential development areas.</td>
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<td>• The provision of walking and cycling friendly streets can significantly increase pedestrian and cyclist activity. Evidence indicates a number of requirements are necessary in order to achieve this. They include providing measures to reduce speed, the re-allocation of road spaces, widening footpaths, providing bicycle and bus lanes, improving/providing adequate public transport, ensuring streets are well connected, greening streets, improving street attractiveness with landscaping and street furniture, investing in maps, street signs and wayfinding, providing dedicated bicycle facilities and using local knowledge to understand problems and devise solutions (3,4,8-11). Hence, these are all details that should be further considered in order to support neighbourhood walkability.</td>
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<td>• Providing destinations within walking distance, easy access to public transport, safe places for people to walk and cycle and access to open space all contribute to developing a healthy built environment that supports physical activity (3,12-15).</td>
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<td>• Salois (16) found that an increase in the percentage of low-income households travelling greater than a mile to a supermarket or grocery store had a positive association with obesity and type-2 diabetes.</td>
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<td>• Exposure to residential environments that include greater resources to support physical activity and, to a lesser extent, healthy diets are associated with reduced body mass index (BMI) and a lower incidence of type-2 diabetes (17,18).</td>
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<td>P117</td>
<td>• It is anticipated that the NSW Department of Sport plan will be able to provide an overview of future needs across SWS District and other Districts. It will be important to monitor the potential development of ‘vertical schools’ with no outdoor space, and the impact this may have on community open space.</td>
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<td>Page 145: Sustainable priority 5:</td>
<td>• In addition to ‘green cover and shade tree planting along major transport corridors’, this could include ensuring that new housing developments provide a certain percentage of tree canopy for dwellings.</td>
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<td>• Consider also to include planning for the majority of new developments to ensure they use solar power.</td>
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| Page 154: Protecting the District’s                                           | • There are a number of action items to improve quality of water in waterways. There is no specific reference to recreational water quality. Perhaps this could be included as there are a number of places along
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<td>waterways</td>
<td>the Georges and Nepean rivers where people recreate and improved water quality will benefit people undertaking water-recreational activities such as swimming.</td>
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<td>Additional Issue P 156-157</td>
<td>We would like to recommend more discussion within the draft plan on the Urban Heat Island (UHI) effect that may potentially be aggravated by the construction of the Western Sydney Airport. The possible impacts of UHI include (19) increased energy consumption, elevated emissions of air pollutants and greenhouse gases, compromised human health and comfort, and impaired water quality. According to the study on UHI conducted in USA, “Baltimore-Washington International Airport...has the third fastest-growing urban heat island effect out of the 60 locations studied.” (20)</td>
</tr>
</tbody>
</table>

References:


2 CHETRE. Health Impact Assessment on Community Consultation for Western Sydney Airport, 2016. (Draft)


4 NSW Department of Health, Healthy Urban Development Checklist 2009:1-130

5 National Heart Foundation of Australia, Blueprint for an active Australia: Government and community actions to increase population levels of physical activity and reduce sedentary behaviour in Australia, 2014-2017, Melbourne: National Heart Foundation of Australia, 2009 2014


7 National Heart Foundation, Healthy Active by Design - A Western Australian project to designing places for active and healthy living. Perth: 2012

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9 Kellett J, Rofe MW. Creating active communities: how can open and public spaces in urban and suburban environments support active living? A literature review. Adelaide: Institute for Sustainable Systems and Technologies, University of South Australia for South Australian Active Living Coalition, 2010 2009
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11 Tolley R. Good for Business$: the benefits of making streets more walking and cycling friendly - Discussion paper, National Heart Foundation of Australia, 2011

12 National Heart Foundation of Australia, Creating healthy neighbourhoods: consumer preferences for healthy development, NSW: 2011

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18 Sarkar C, Gallacher J, Webster C. Built environment configuration and change in body mass index: the Caerphilly Prospective Study (CaPS), Health & place, 2013;19:33-44

19 https://www.epa.gov/heat-islands/heat-island-impacts