

[REDACTED]

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**From:** system@accelo.com on behalf of Mariana Benjamin [REDACTED]  
**Sent:** Monday, 29 October 2018 4:06 PM  
**To:** [REDACTED]  
**Subject:** Submission Details for company NSW Health - South Western Sydney Local Health District (org\_comments)  
**Attachments:** 290833\_NSW Health\_ South Western Sydney Local Health District submission\_ 7 October 2018.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements:

Name: Mariana Benjamin  
Organisation: NSW Health - South Western Sydney Local Health District (Acting Review Officer)  
Govt. Agency: Yes  
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[REDACTED] Liverpool BC, NSW

Content:

Please see attached submission from South Western Sydney Local Health District, NSW Health.

IP Address: - 141.243.33.161

Submission: Online Submission from company NSW Health - South Western Sydney Local Health District (org\_comments)

[https://majorprojects.accelo.com/?action=view\\_activity&id=290833](https://majorprojects.accelo.com/?action=view_activity&id=290833)

Submission for Job: #9552

[https://majorprojects.accelo.com/?action=view\\_job&id=9552](https://majorprojects.accelo.com/?action=view_job&id=9552)

Site: #0

[https://majorprojects.accelo.com/?action=view\\_site&id=0](https://majorprojects.accelo.com/?action=view_site&id=0)

[Redacted]

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Subject:

Submission Details for company NSW Health - South Western Sydney Local Health

District (org\_comments)

520833 NSW Health - South Western Sydney Local Health District submission\_7

Attachments:

October 2018.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements:

Name: Mariana Benjamin

Organisation: NSW Health - South Western Sydney Local Health District (Acting Review Officer)

Govt Agency: Yes

Email: [Redacted]

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Content:

Please see attached submission from South Western Sydney Local Health District, NSW Health.

IP Address: - 74.1.243.33 181

Submission: Online Submission from company NSW Health - South Western Sydney Local Health District

(org\_comments)

[https://imaisyncs.accdo.com/action-view\\_servlet?id=520833](https://imaisyncs.accdo.com/action-view_servlet?id=520833)

Submission for Job: 45552

[https://imaisyncs.accdo.com/action-view\\_job?id=45552](https://imaisyncs.accdo.com/action-view_job?id=45552)

Size: 40

[https://imaisyncs.accdo.com/action-view\\_attachment?id=40](https://imaisyncs.accdo.com/action-view_attachment?id=40)



# Health

## South Western Sydney Local Health District

SWD18/75575

Mr Brett Whitworth  
Director Aerotropolis Activation  
Department of Planning and Environment  
[aerotropolis@planning.nsw.gov.au](mailto:aerotropolis@planning.nsw.gov.au)

Dear Mr Whitworth,

### **Exhibition of Western Sydney Aerotropolis Stage 1 Land Use and Infrastructure Implementation Plan (LUIP)**

Thank you for the opportunity to provide comment on the Western Sydney Aerotropolis LUIP. South Western Sydney Local Health District (SWSLHD) recognises that the built and social environment can significantly influence health outcomes and acknowledges the important role this plan will have in creating a healthy, liveable and connected aerotropolis in western Sydney.

SWSLHD is supportive of the development of health facilities within the Aerotropolis precincts, and co-location with education and other facilities is consistent with planning for Shared Service Delivery Hubs. Co-location of health services with public transport modes is a key consideration for placement of health facilities into the future, ensuring good accessibility for consumers and staff.

Active transport will be a hallmark of healthy and liveable cities of the future, so the vision for the Aerotropolis will need to have a clear focus on this in the LUIP. We welcome the commitment to walking and cycling paths, but recognise that active transport has different drivers to recreational exercise and walking and should be considered as a focus area in its own right.

Ground-based noise from the airport appears not to have been considered. Residential land uses may need to be further restricted and noise mitigated at the source through barriers, or incorporated into the design of dwellings.

Please find attached a detailed list of comments and recommendations on the LUIP.

Should you require further information, please contact Dr Stephen Conaty, Director Population Health, SWSLHD, on 02 938 5719 or via email [stephen.conaty@health.nsw.gov.au](mailto:stephen.conaty@health.nsw.gov.au)

Regards,

**Amanda Larkin**  
Chief Executive

Date: 7/10/18

South Western Sydney Local Health District acknowledges the traditional owners of the land.

## Appendix 1. South Western Sydney Local Health District Response to Western Sydney Aerotropolis LUIP

### 1. Health Facilities

Plan reference	Comments/Recommendations
Page 48 6.1.3 Health Facilities	<p>SWSLHD agree with the statements made in this section of the document and contribute the following additional details:</p> <ul style="list-style-type: none"> <li>As part of supporting growth in the South Western Planned Precincts, a mid-size public hospital is proposed for the Bringelly area. This may be located within the Aerotropolis Core to serve the health needs of the wider Aerotropolis region.</li> <li>A key feature of SWSLHD's planning for future community-based services is Shared Service Delivery, which describes the co-location of health services with other key community services e.g. schools. As the Aerotropolis develops, this model will enable the provision of care closer to where people live and work, even as populations are emerging.</li> <li>An Integrated Health Hub is planned for Leppington, located in close proximity to public transport linkages including Leppington train station. While not within the Aerotropolis region, this health facility would service areas of the Aerotropolis particularly the Aerotropolis Core. The Integrated Health Hub model would reduce the demand on acute hospitals, and deliver a mix of medical, nursing and allied health specialties, supporting and building capacity for general practice and ambulance diversion.</li> </ul>

### 2. Active Travel

SWSLHD recommends the LUIP place more emphasis on planning for active travel. The omission of active transport in the vision statement (page 15) is a missed opportunity to make this a visible priority. Under section 4.2.1, there is a welcome aspiration to 'making public and active transport the easiest and most convenient choice', and this needs to be described and backed up in the rest of the plan.

The commitment to provide walkways and bicycle paths is to be commended. To create a truly liveable city, provision for active transport and leisure and recreational use needs to be at the heart of planning throughout the Aerotropolis, and not confined to the green corridors. We welcome the commitment to walking and cycle paths, but there is little to no mention of active transport across the Aerotropolis, as distinct from leisure and recreational use of paths. Active transport has different drivers to recreational exercise and walking, and should be considered as an important area in its own right.

Active transport has well documented health benefits and is reliant on urban design that considers factors such as perceived safety from crime and traffic, shorter distances to destinations, and density of residential dwelling. It is also supported by available and reliable public transport.

Many of the proposed rail links and stations in the LUIP are described as 'potential' or 'in planning'. Whether or not these are implemented will have a major impact on how well the plan is able to realise its aspirations.



The Aerotropolis development offers an excellent opportunity to get the planning right from the start. We recommend a strong focus on public transport infrastructure that is prioritised, developed early and promoted, for the benefits it brings through reducing carbon emissions, reducing pollution, noise and urban heat island effects and increasing active modes of travel.<sup>i,ii,iii</sup>

Plan reference	Comments/Recommendations
FAQ	The FAQ could be read as a signpost for key factors about the Aerotropolis. It focuses almost entirely on jobs and economic issues. As the Aerotropolis includes a substantial residential component, it would be beneficial to include aspects related to residential use reflected in the FAQ.
Page 22	The design principles are generally sound, and to encourage walkability we welcome the commitment to activated main streets (avoiding internalised shopping malls), squares, parks and streetscapes.
Page 22	The commitment to green canopies is important, not only for heat reduction, UV filtration and the visual amenity, but for the impact that both of these outcomes are likely to have on walkability. Future planning will also need to include other design elements to promote and enhance active transport and pedestrian amenity, including plenty of seating, gathering spaces, drinking water fountains, bike lockers or storage spaces.
Page 34	Streets will need to be designed for sharing, with slow speeds mandated and measures taken to ensure safety for all users.

### 3. Healthy Food Production within Aerotropolis

Plan reference	Comments/Recommendations
Page 26	<p>Peri urban agriculture is briefly referenced with a Metropolitan rural area planned to the west of the Aerotropolis, and has been described in the Western Parkland City District Plan. This is intended to limit urban growth into these areas.</p> <p>Rapid urbanisation is likely to result in an overall drop in agricultural production of 20–40% worldwide<sup>iv</sup>. Fresh food grown in peri urban areas has easy access to local markets and can provide local jobs. Maintaining peri urban agriculture should be considered as an important aspect of resilient cities in the face of changing climate and other shocks. The World Health Organisation (WHO) Healthy Cities program calls for governments to incorporate food policies into urban plans<sup>iv</sup>.</p>
Page 44	<p>Protection for other agricultural enterprises in the area is unclear. The proposed SEPP states that agriculture and agribusiness land use zones 'will be retained until precincts are rezoned'. While there is mention under 6.1.4 of some grazing and market gardens, these are clearly on a very small scale and relate more to open space provision than to serious agricultural production. We would like to see clearer commitment to peri urban agriculture in the Aerotropolis.</p> <p>Experience has shown that without strong protections and clear policies, agricultural land will always be vulnerable to market forces, and this is an</p>

Plan reference	Comments/Recommendations
	important point to consider at this stage of the planning process <sup>iv</sup> .

#### 4. Noise

Plan reference	Comments/Recommendations
Page 28	In section 4.1.1 the constraints posed by aircraft noise on land use are described. The approach of using AENC/F 20 is supported generally. We note that there is no consideration of ground-based noise. This potentially affects residential areas of the Aerotropolis Core and Northern Gateway. See for example section 11.6 of the EIS (e.g. Figure 11-10). Residential uses may need to be further restricted, or mitigation provided at source, through barriers, or noise attenuation in dwelling construction.

#### 5. Open Space

We support plans to maximise connections to open space, as there are well recognised health and mental wellbeing benefits to such planning strategies<sup>v</sup>.

Plan reference	Comments/Recommendations
Page 8	With reference to '...and allow for a diversity of housing within 10 minutes of centres and 5 minutes of parks and open space' - please clarify whether times refer to travel by driving or walking, as there is a significant difference.

#### 6. Urban Heat

The LUIP acknowledges that the Aerotropolis is located in one of the warmest parts of Western Sydney, and that heat influences the health and lifestyles of residents and workers. SWSLHD would like to stress the importance of mitigating urban heat effects to support health and wellbeing.

The new airport, buildings and roads in the region will contribute to urban heat effects unless effective mitigation strategies are implemented. Urban heat islands are caused by air pollution, thermal properties of building materials, lack of air flow and heat produced by concentrated human activity (e.g. air conditioning, industry, transport)<sup>vi</sup>.

Extreme heat is associated with increased morbidity and mortality. Heat-related health service activity in Melbourne increased above expected levels within the first 24 hours of an extreme heat event<sup>vii</sup>. Studies show an increase in ambulance transports, emergency department presentations and hospitalisations during heat waves<sup>viii</sup>, and there is evidence of an increase in mortality rates in Australian cities associated with increased temperature<sup>viii</sup>.

Extreme heat causes heat exhaustion, heat collapse and heat stroke, and can also exacerbate existing health conditions. Older people, very young children, Aboriginal people and those with chronic disease are particularly vulnerable to extreme heat. People working outdoors are also at higher risk of heat stress<sup>ix</sup>.

Plan reference	Comments/Recommendations
Page 8	SWSLHD supports strategies to mitigate urban heat effects including proximity to South Creek and its tributaries and expansion of the tree canopy (section 4.3.2).

Plan reference	Comments/Recommendations
Page 38 Section 4.3 – A sustainable, liveable and green Aerotropolis	This section could also explicitly address the issue of urban heat and explore other heat mitigation strategies, such as greenroofs, cooling building materials, active travel, heat monitoring and response plans <sup>x</sup> .

## 7. Housing Density

We support the grand vision outlined for future Aerotropolis neighbourhoods, but there is a lack of detail on how this will be achieved in the long term, and what the future communities might look like, including density, building heights, etc.

SWSLHD is concerned that the 'streamlined planning process' will remove ability for local government and other stakeholders (including Health) to influence the design of urban environments and their impact on the health of residents.

Density done well may contribute to population health benefits, but higher density housing done poorly can contribute significantly to poor mental wellbeing, particularly in relation to noise from traffic and neighbours<sup>xi</sup>. Apartment dwellers in the higher density Aerotropolis Core will be exposed to noise from the airport as well as from neighbours living in close proximity. As increased numbers of people are choosing to live in strata developments, there has been an increase in noise complaints, causing high levels of stress and anxiety for strata residents.<sup>xii,xiii</sup>

The health impacts of noise exposure may be improved by setting homes, schools and other services facing away from heavily trafficked routes; reducing and slowing road traffic; using noise abating road-surfacing materials; and designing housing to improve sound attenuation.<sup>xiv</sup>

Plan reference	Comments/Recommendations
Page 18 Initial precinct planning	The LUIIP states that this housing will be built to minimise noise intrusion, and will have higher densities comparable to inner city locations. The furthest point of mixed employment & urban land zone is approximately 6km from the centre of the airport, so soundproofing treatments for housing will be essential to ensure an acceptable quality of life for residents.
Pg. 56 Expected planning Outcomes – Initial Precincts – Aerotropolis Core	Under 'Desirable Land Uses' (Aerotropolis Core) there is no mention of residential use (only visitor accommodation), but the 'expected homes' is listed as 8000? It is assumed that the Core will be the location for the bulk of higher density living in Stage 1.

<sup>i</sup> Chronic disease and climate change: understanding co-benefits and their policy implications. NSW Public Health Bulletin Vol. 21 (5-6) May – June 2010

<sup>ii</sup> Ewing R, Cervero R. Travel and the built environment: a meta-analysis. J Am Plann Assoc. 2010. 265-94

<sup>iii</sup> Urban Design, transport and health. The Lancet.com. Published online September 23 2016  
[http://dx.doi.org/10.1016/S0140-6736\(16\)30067-8](http://dx.doi.org/10.1016/S0140-6736(16)30067-8)

<sup>iv</sup> Shaping Cities for Health: complexity and the planning of urban environments in the 21st century.  
<https://www.thelancet.com/commissions/healthy-cities>



- <sup>v</sup> Gascon M, et al. 2016. Residential green spaces and mortality: A systematic review. *Environ Int.* Vol 86, pp60-67. <https://www.sciencedirect.com/science/article/pii/S0160412015300799?via%3Dihub>
- <sup>vi</sup> Stone B, Hess J J, and Frumkin H. 2010. Urban Form and Extreme Heat Events: Are Sprawling Cities More Vulnerable to Climate Change than Compact Cities? *Environmental Health Perspectives*, Vol 118, No 10, pp. 1425-1428
- <sup>vii</sup> Victorian Department of Health 2011, The population health impacts of heat: Key learnings from the Victorian Heat Health Information Surveillance System, Victorian Department of Health, Melbourne
- <sup>viii</sup> Bi P, Williams S, Loughnan M, Lloyd G, Hansen A, Kjellstrom T, Dear K and Saniotis A 2011, 'The Effects of Extreme Heat on Human Mortality and Morbidity in Australia: Implications for Public Health', *Asia-Pacific Journal of Public Health*, Vol 23, No 2, pp.275-365
- <sup>ix</sup> Hanna E G, Kjellstrom T, Bennett C and Dear K 2011, 'Climate Change and Rising Heat: Population Health Implications for Working People in Australia', *Asia-Pacific Journal of Public Health*, Vol 23, No 2, pp. 14S-26S
- <sup>x</sup> Lee J S, Kim J T and Lee M G 2014, 'Mitigation of urban heat island effect and greenroofs', *Indoor and Built Environment*, Vol 23, No 1, pp. 62-69
- <sup>xi</sup> World Health Organisation. 2011. Burden of disease from environmental noise. [http://www.who.int/quantifying\\_ehimpacts/publications/e94888/en/](http://www.who.int/quantifying_ehimpacts/publications/e94888/en/)
- <sup>xii</sup> The Fifth Estate. 2017. Noise pollution a growing concern for strata developments. <https://www.thefifthestate.com.au/business/government/noise-pollution-a-growing-concern-for-strata-developments>
- <sup>xiii</sup> Randolph B. Delivering the compact city in Australia: current trends and future implications. *Journal Urban Policy and Research* 2006; 24: 473-490.
- <sup>xiv</sup> Giles-Corti B, Vernez-Moudon A, Reis R, Turrell G, Dannenberg A L, Badland H, Foster S, Lowe M, Sallis J F, Stevenson M, Owen N. Urban design, transport, and health 1. City planning and population health: a global challenge. *Lancet* 2016; 388: 2912-24.