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**Sent:** Wednesday, 11 March 2020 12:20 PM  
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**Subject:** FW: Webform submission from: [webform\_submission:source-title]

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**From:** [REDACTED] ] On Behalf Of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Monday, 9 March 2020 10:40 AM  
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**Subject:** FW: Webform submission from: [webform\_submission:source-title]

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**From:** [REDACTED]  
**Sent:** Monday, 9 March 2020 10:19 AM  
**To:** [REDACTED]  
**Subject:** Webform submission from: [webform\_submission:source-title]

Submitted on Mon, 09/03/2020 - 10:14

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: [REDACTED]

Last Name: [REDACTED]

Name Withheld: Yes

Email: [REDACTED]

Suburb/Town & Postcode: 2170

Submission file:

[kf---013--0220---swd20-14026---swslhd-response---western-sydney-planning-partnership---western-sydney-aerotropolis-planning-package.pdf](#)

Submission: South Western Sydney Local Health District (SWSLHD) Response - Western Sydney Planning Partnership - Western Sydney Aerotropolis Planning Package

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/western-sydney-aerotropolis-planning-package>



Western Sydney Planning Partnership  
PO Box 257  
PARRAMATTA NSW 2124

To whom it may concern

Thank you for the opportunity to provide comment on the Western Sydney Aerotropolis Plan, the Western Sydney Aerotropolis Discussion Paper on the Proposed State Environmental Planning Policy (SEPP), and the Western Sydney Aerotropolis Development Control Plan (DCP) 2019.

South Western Sydney Local Health District (SWSLHD) recognises that the built and social environment can significantly influence health outcomes and acknowledges the important role these plans will have in creating a healthy, liveable and connected Aerotropolis.

The planning principles within the Western Sydney Aerotropolis Plan are excellent and we strongly support the sustainability objectives. We are however, greatly concerned that the delivery of public transport infrastructure in line with 'public demand' will be too late to prevent car-dependence or generate a real mode shift from cars to public transport and active travel modes.

SWSLHD proposes to meet the public health care needs of the Aerotropolis and surrounding growth areas through the development of an Integrated Health Hub (IHHub) in the Aerotropolis Core. This aligns with the state wide priority of strengthening care in the community to avoid hospital admissions. The IHHub will ideally be located close to public transport, parking, community amenities, and educational facilities such as the multi-university campus in the Western Parkland City. Hospital-based care will remain at the nearby acute facilities of Liverpool and Campbelltown, which are currently undergoing redevelopment.

The following comments and recommendations are designed to provide further constructive feedback on the three planning documents. Should you require further information, please contact Dr Stephen Conaty, Director Population Health, SWSLHD, on [REDACTED]

Regards [REDACTED]

**Amanda Larkin**

Chief Executive

Date: 1/3/20

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

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## Western Sydney Aerotropolis Plan

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General	<p>SWSLHD acknowledges the complex nature of this exercise and finds the planning principles in the Appendix excellent, particularly the overarching objective to recognise Country.</p> <p>SWSLHD strongly supports the water conservation principles detailed in the vision for the Aerotropolis, and the emphasis on a circular economy that will improve resilience and adaptability for the Aerotropolis.</p>
Health facilities	<p>SWSLHD faces fundamental challenges in servicing the growing populations covered within the Aerotropolis land use plan. These include:</p> <ul style="list-style-type: none"> <li>• Servicing specific growing population groups such as older adults and children.</li> <li>• Addressing health disadvantage &amp; inequity.</li> <li>• Attracting a skilled workforce.</li> <li>• Sufficient infrastructure for demand, and ensuring safety and quality.</li> <li>• The need for the public system to meet local demand with few private operators in the region.</li> </ul> <p>The Integrated Health Neighbourhoods (IHN) strategy was created by SWSLHD to ensure the health and wellness of the population in the context of the challenges outlined above. An integrated primary and community care model has long been identified as a future direction for SWSLHD. The health neighbourhood will provide comprehensive services across primary, community, hospital and other health-related services, linked along the continuum to provide seamless patient care. The IHN approach involves a shift from inpatient models to ambulatory, primary (General Practitioner) and community models amongst other non-hospital services, to decrease admission rates and length of stay for some groups of patients and reduce reliance on hospitals as the major providers of health care.</p> <p>A proposed feature of the IHN is the Integrated Health Hub (IHHub) which will deliver a comprehensive range of clinical services that can support 'stepped-up care' for local primary care providers and, where possible, outreach models of care for clinical services traditionally delivered from hospital sites. The IHHub approach aims to provide innovative and evidence-based care close to homes and transport links. The contemporary approach of the IHHub will provide new opportunities for greater collaboration and skill enhancement of the primary care sector and will be supported by seven day-per-week services for patients who require frequent care. Hospital-based care will remain at the nearby acute facilities of Liverpool and Campbelltown, which are undergoing significant redevelopments to expand and develop services.</p> <p>SWSLHD proposes a number potential locations for IHHubs, one being within the Aerotropolis Core. The Aerotropolis Core IHHub will be a hub for</p>

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	<p>multidisciplinary and specialist medical ambulatory care, offering a mix of complex care services able to be delivered safely and effectively in a community environment. The services provided will depend on the needs and size of the local population but may include Community Health services, Renal Dialysis, Chemotherapy Chairs and Cancer Services, Oral Health, Drug Health, Mental Health and Specialist Clinic outreach. Another feature of the Aerotropolis Core IHHub will be linked digital health systems, enabling integration across hospital and non-hospital locations.</p> <p>The preferred location for the proposed Aerotropolis Core IHHub will be a central setting, close to public transport routes, parking and other community amenities. The IHHub will ideally be located in the vicinity of the Multi-University Campus Western Parkland City and other community and educational services, to take advantage of the proximity of these facilities and the synergies created as a result.</p> <p>Based on current population projections, it is likely that the IHHub will not be required until after 2030, however it is important that health-specific land is zoned within the proposed strategic centre, to ensure it is accessible to the population when services are required.</p>
P 4.	<p>We support noise sensitive uses in appropriate locations to protect the community from 24/7 airport operations.</p> <p>The Plan aims for people to live within 30 minutes by public transport of their nearest strategic or metropolitan centre. Currently the timing and location of key public transport hubs is unclear. Evidence demonstrates that public transport and active transport are important determinants of health and wellbeing. The unequal distribution of public transport, particularly in relation to locational disadvantaged communities creates and exacerbates inequalities. For public transport infrastructure and associated logistics, we recommend that:</p> <ul style="list-style-type: none"> <li>• Locations are identified and publicised at an early stage to allow for planning of housing and other resources in appropriate distance of transport hubs.</li> <li>• Public transport links are prioritised in relation to existing locational disadvantaged communities.</li> <li>• Public transport clearly links people with resources, such as access to jobs, education, health services, and green space.</li> <li>• Public transport is activated at an early stage, rather than waiting until population levels reach capacity, to support adoption of public transport modes as opposed to car dependency.</li> <li>• Supportive planning measures are initiated, such as limiting car parking and removing barriers to accessing active and public transport.</li> </ul>
P 18. Vision	<p>We endorse the commitments to:</p> <ul style="list-style-type: none"> <li>• Frame the Aerotropolis around the blue-green corridors.</li> <li>• Diversity of housing that will contribute to a vibrant and liveable city.</li> <li>• Public transport links, walking and cycling facilities, and smart technologies.</li> </ul> <p>These commitments will support the health and wellbeing of residents through</p>

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	access to physical activity opportunities, social connections, networks and sense of community <sup>1,2</sup> .
P 20. 2.1 Achieving the vision	The explanation of the landscape led approach is very clear and the diagrams are easy to understand. This style of urban planning and design supports greater opportunities for social interaction, facilitating chance encounters between users and fostering a greater sense of community <sup>3</sup> .
P 23. 2.3 Designing a cool, green city	<p>We support the vision for a cool, green new city that minimises its urban footprint and maximises open space, waterways and recreation areas. Neighbourhood designs that entice people outdoors through diverse local destinations and connected routes encourage and create natural surveillance which enhances and promotes neighbourly interactions, social capital and sense of community<sup>4</sup>.</p> <p>However, higher density living can only bring about health benefits if done well<sup>5</sup> and the following factors are well considered:</p> <ul style="list-style-type: none"> <li>• The building (its location, construction, design, management and maintenance).</li> <li>• The socioeconomic and cultural make-up of residents and the local neighbourhood.</li> <li>• The quality and amenity of the neighbourhood environment<sup>6</sup>.</li> </ul> <p>To maximise the health benefits and minimise harm, we recommend the second phase of the DCP be strengthened to ensure high quality building design and construction standards are met within the Aerotropolis.</p>
P 24. 2.3.1 Public Domain	<p>We fully support the landscape-led approach that integrates the various elements of the public domain. It is worth noting that the quality of these spaces and not just the quantity is important for creating community attachment and a sense of community<sup>7,8</sup>.</p> <p>We are concerned that the non-mandatory nature of the DCP will lack the</p>

<sup>1</sup> Kawachi I. Social capital and community effects on population and individual health. *Annals of the New York Academy of Sciences*. 1999;896:120-30.

<sup>2</sup> Farahani LM. The Value of the Sense of Community and Neighbouring. *Hous Theory Soc*. 2016;33(3):357-76

<sup>3</sup> Talen E. Measuring the Public Realm: A Preliminary Assessment of the Link Between Public Space and Sense of Community. *Journal of Architectural and Planning Research*. 2000;17:344-60

<sup>4</sup> Leyden KM. (2003). Social capital and the built environment: the importance of walkable neighborhoods. *American Journal of Public Health*, 93(9): 1546-1551.

<sup>5</sup> Giles-Corti B, Ryan K, Foster S, 2012. Increasing density in Australia: maximising the health benefits and minimising the harm, report to the National Heart Foundation of Australia, Melbourne. <https://www.heartfoundation.org.au/images/uploads/publications/Increasing-density-in-Australia-Evidence-Review-2012-trevor.pdf>

<sup>6</sup> Giles-Corti B, Ryan K, Foster S. Increasing Density in Australia: Maximising the Health Benefits and Minimising Harm. Perth, Western Australia: National Heart Foundation of Australia, 2012.

<sup>7</sup> Osborne C, Baldwin C, Thomsen D. Contributions of Social Capital to Best Practice Urban Planning Outcomes. *Urban Policy Res*. 2016;34(3):212-24.

<sup>8</sup> Arnberger A, Eder R. The influence of green space on community attachment of urban and suburban residents. *Urban For Urban Green*. 2012;11(1):41-9.

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	capacity to ensure the 'quality' of the public domain required to achieve the vision.
P 24. Transitioning to an Aerotropolis	<p>We support sequencing of development to ensure it remains compact and avoids dispersed development. This is important for access to public transport, walkable access to local schools for children, and employment for young people and adults.</p> <p>The paragraph about "Careful planning of precincts that may initially accommodate larger building footprints..." is confusing and we are not clear what the implications of this may be.</p>
P 28. 3.2.1 Aerotropolis SEPP	<p>We support planning policy that ensures there is no increase in noise sensitive uses within the Australian Noise Exposure Concept (ANEC)/Australian Noise Exposure Forecast (ANEF) 20 and above contours.</p> <p>Residential and noise sensitive land uses should not be permitted in land affected by the ANEC/ANEF 20 and above contours.</p>
P 36. Future transport	<p>There is conflict on this page between proposed public and active travel infrastructure and prioritised major road infrastructure that has already created a car-dependent city in the west of Sydney.</p> <p>If the vision is for people in the Aerotropolis to be able to walk to a Metro, and enjoy frequent and direct bus services, then the staging of public transport services with development <i>based on demand</i> will fail. The motorways and main roads are already being built, so the demand for public transport will never be generated whilst the car alternative is already there. Travel behaviours are difficult to change once initiated, so it is vital that people are able to live the vision right from the outset, not in 10 to 20 years when demand arises.</p> <p>Transport planning needs to move away from the current predict and provide approach. Traffic predictions are always going to be high, due to the infrastructure already in place and behaviours already established.</p> <p>Planning needs to create its vision for public transport and active travel and prioritise this infrastructure early. Demand for public transport will never come if infrastructure is not there and roads remain the easy option.</p>
P 40. 4.5 Integrated water, wastewater and recycled water services	<p>This section seems appropriate but we will await further details from Sydney Water for their Western Sydney Regional Master Plan and Upper South Creek Water Factory. Any recycled water proposals will need to meet the current Water Industry Competition Act (WICA) framework.</p> <p>Providing treated recycle water is supported where the business case and need is proven. Different end uses can require different standards of treated recycled water. Providing recycled water duplicates much of the infrastructure required for town water. The cost of providing recycled water currently is about 66% the cost of town water, though Hunter Water's recycled water scheme is 87% the cost of town water. Ideally the recycled water is produced close to where it is</p>

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	generated, and the quality needs to be monitored to ensure it always meets the required standards. The necessary controls should be appropriate to the end use to safeguard public health.
P 40. 4.5.1 Warragamba pipeline	We support safeguarding of this infrastructure to ensure the integrity of existing drinking water.
P 44. 5. Safeguarding the 24-hour airport  Aircraft noise and development	<p>We support plans to prevent the encroachment of noise sensitive land uses into areas affected by aircraft noise and operational airspace.</p> <p>We support the location of residential development in high amenity areas not fronting major roads and public transport routes.</p> <p>We also strongly support the location of residential development within a walkable distance (800 metres) of public transport and the creek system.</p> <p>It is also appropriate on existing residential land that renovations to existing houses or minor extensions will be allowed, subject to appropriate noise mitigation management measures.</p>
P 46. Aircraft noise and development	We support a precautionary approach to residential development within the 20 ANEC/ANEF and above contour.
P 56. Precinct planning	<p>We support planning that separates noise tolerant land uses into precincts within the 20 ANEC/ANEF and above contours, and placement of noise sensitive land uses and receptors into precincts outside the 20 ANEC/ANEF contours.</p> <p>We support adoption of appropriate design and construction standards to reduce aircraft noise impacts in development up to the ANEC/ANEF 20 and above contours.</p> <p>We support policy that prohibits intensification of residential development with the ANEC/ANEF 20 and above contours.</p> <p>We support policy that avoids encroachment of urban development so that future infrastructure does not limit development opportunities or incorporate upfront measures to mitigate noise and visual impacts.</p>
P 58. 7.2.1 Aerotropolis Core Precinct	We commend the goal to locate all residential communities within 800 metres or a 10 minute walk of the metro station, but find this may in all likelihood be impossible, based on the size of the precinct and the likely station location at the Aerotropolis Core (p.37). There will need to be strong controls in place to ensure that residential development only occurs within this walkable distance from the station.
P 71. 7.3 Expected	To achieve the goals of a circular economy for the Aerotropolis, the Strategic Outcome, 'Integrate sustainable energy, waste and water as well as circular



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Planning Outcomes  7.3.6 Agribusiness Precinct	<p>economy design principles into development and operations', would be well placed under all of the precinct strategic outcomes, not just for the agribusiness precinct.</p> <p>It will also be important for the Agribusiness precinct to strengthen the security and resilience of the fresh food available in Sydney's west. According to the KPMG report<sup>9</sup>, this precinct has the potential to create 12,000 jobs and provide local residents access to fresh fruit, vegetables and meat products sourced from within the Sydney Basin and the airport precinct. We would like to see the Strategic Outcome adjusted to include the local community. An example is: 'Provide a world-class agriculture and agribusiness precinct that will deliver fresh and value-added Australian food production from farm gate to <u>Greater Sydney</u> and the global market.'</p>
Pp 76, 78, 82 Expected Planning Outcomes – remaining precincts	<p>Key considerations for the remaining precincts should include interfaces with surrounding creeks including:</p> <ul style="list-style-type: none"> <li>• Badgerys Creek and Duncan's Creek for the Dwyer Road Precinct</li> <li>• Kemps Creek and Wianamatta-South Creek for the Kemps Creek Precinct and the Rossmore Precinct.</li> </ul>
P 87. Community consultation	<p>Community engagement in decision making and planning processes for major infrastructures significantly impacts on community health and wellbeing. We strongly recommend that the planned community consultation process described on page 87 is carried out following best practice standards. It is currently unclear within the documents the level and type of planned community and stakeholder engagement. Please refer to report '<a href="#">Health Impact Assessment of Western Sydney Airport Community Engagement Process</a>' for guidance on potential health and wellbeing impacts and relevant, validated and internationally recognised approaches.</p>
P 93. Planning Principles  Sustainability Objective 4 SU13	<p>Use of stormwater or recycled water to irrigate streets and public open space, to support public amenity and urban cooling need to be treated to the appropriate level for end use and to protect public health. Recycled water would need to comply with Water Industry Competition Act (WICA) requirements, and stormwater reuse should follow advice in publications such as:</p> <ul style="list-style-type: none"> <li>• Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions; NSW Office of Environment and Heritage; May 2017</li> <li>• Urban Stormwater Best Practice Environmental Management Guidelines; Victoria Stormwater Committee; CSIRO 1999</li> </ul>
P 94. Liveability	<p>We recommend the Liveability objectives include access to healthy food for people in the Aerotropolis. This is consistent with the Western City District Plan</p>

<sup>9</sup> KPMG, 2017. Think big, think fresh – A fresh food precinct at the heart of Western Sydney.  
<https://assets.kpmg/content/dam/kpmg/au/pdf/2017/western-sydney-fresh-food-precinct.pdf>



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objectives 9	<p>and may look like:</p> <ul style="list-style-type: none"> <li>• Protect and promote diverse food retail outlets, promote street markets and farmers' markets, and create a wealth of opportunities for healthy food enterprises to flourish.</li> <li>• Provide (or protect and promote) local access to healthy fresh food and support local fresh food production.</li> </ul>

### Western Sydney Aerotropolis Discussion Paper on the Proposed State Environmental Planning Policy (SEPP)

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P 11. Essential Infrastructure Provision	<p>It is identified that 'Precinct planning processes will also incorporate planning for a fuel pipeline to the Airport. Consideration will be given in ongoing planning to appropriate setbacks to the pipeline, suitable adjacent development types and mitigation measures to ensure compatible land use development is planned for.' The relevant Deloitte analysis<sup>10</sup> reported on options for a corridor for a pipeline to supply aviation fuel to the new Western Sydney Airport. We urge a more comprehensive analysis of fuel transport dimensions, including the health impacts of fleets of fuel trucks through residential areas between 2026 and 2034 (when, according to the analysis, a pipeline would be prudent).</p> <p>We recommend that the fuel pipeline corridor is identified and reserved at an early stage, as recommended in the report<sup>10</sup>. This is in order to avoid the use of fuel trucks to transport fuel. There is a risk that if the pipeline is not reserved and planned at an early stage that the Aerotropolis will be reliant on heavy diesel trucks. The use of fuel trucks creates road traffic incident risks, increases pollution and traffic levels, and negatively impacts on noise and air quality.</p> <p>We recommend that a Health Impact Assessment (HIA) is conducted on the proposed fuel pipeline (and/or its absence).</p>
Part 3 – Proposed land use controls	<p>The zone objectives should include language that demonstrates a clear commitment to health and wellbeing in Western Sydney. For example:</p> <p>Enterprise Zone</p> <ul style="list-style-type: none"> <li>• To support the health and wellbeing of the community by encouraging development that provides employment, community services, housing choice, access to healthy food and opportunities for incidental social interaction.</li> </ul> <p>Mixed Use Zone</p> <ul style="list-style-type: none"> <li>• To support the health and wellbeing of the community by encouraging</li> </ul>

<sup>10</sup> Commonwealth of Australia. 2017. Western Sydney Airport Aviation Fuel Supply Corridor Options Report. Prepared for the Department of Infrastructure, Regional Development and Cities by Deloitte. [http://www.nobca.org.au/documents/Fuel\\_Supply\\_Corridor\\_Options\\_Report\\_Feb2018.pdf](http://www.nobca.org.au/documents/Fuel_Supply_Corridor_Options_Report_Feb2018.pdf)

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	<p>development that provides employment, community services, housing choice, access to healthy food and opportunities for incidental social interaction.</p> <p>Environment and Recreation Zone</p> <ul style="list-style-type: none"> <li>To support the health and wellbeing of the community by protecting biodiversity, providing opportunities for people to engage with nature and providing spaces for physical activity, recreation and active transport.</li> </ul> <p>Infrastructure Zone (SP1)</p> <ul style="list-style-type: none"> <li>To support the health and wellbeing of the community by ensuring that land is available for infrastructure and special activities, particularly education and agricultural research.</li> </ul> <p>Infrastructure Zone (SP2)</p> <ul style="list-style-type: none"> <li>To support the health and wellbeing of the community by ensuring that land is available for infrastructure.</li> </ul> <p>Agribusiness Zone</p> <ul style="list-style-type: none"> <li>To support the health and wellbeing of the community by ensuring that land is available for local consumption of fresh foods, such as artisan food and drink industry, roadside stalls and markets. (e.g. artisan food and drink industry, roadside stalls, markets).</li> </ul>
Environment and Recreation Zone (3. Permitted with consent) on page 19	This zone should also permit uses that promote social cohesion, such as busking, music and cultural festivals, outdoor dining, markets, and infrastructure to enable electric bikes and electric scooters.

### Western Sydney Aerotropolis Development Control Plan (DCP) 2019

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P 10. Landscape led approach	<p>We strongly support this new approach to planning and urban design. In light of the emerging refocus on a climate change adaptation and mitigation policy at virtually every level of government and governance, and in line with growing community concern, we recommend general planning standards that avoid impermeable (concrete) surfaces and an integral adoption of permeable surfaces, vegetation and tree cover with appropriate canopy.</p> <p>We also recommend a stimulation of carbon neutral industries and infrastructures in mixed and industrial areas.</p>
P 14. 1.11 Development	<p>We recommend that Health Impact Assessment (HIA) is included in this list. Aspects of HIA include social impacts, so it could be included as Social/Health</p>

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Application Process	Impact Assessment.
P 16. 2.1 Aerotropolis Core Precinct (2.1.2 Objectives)	<p>The Precinct objectives should include language that demonstrates a clear commitment to health and wellbeing in Western Sydney. This is consistent with Liveability planning priorities in the Western City District Plan.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• Support the health and wellbeing of the community by encouraging development that provides employment, community services, housing choice, access to healthy food, and opportunities for incidental social interaction.</li> </ul>
P 18. 2.2 Northern Gateway Precinct (2.2.2 Objectives)	<p>The Precinct objectives should include language that demonstrates a clear commitment to health and wellbeing in Western Sydney. For example:</p> <ul style="list-style-type: none"> <li>• Support the health and wellbeing of the community by encouraging development that provides employment, community services, access to healthy food and opportunities for incidental social interaction.</li> </ul>
P 19. 2.3 Wianamatta-South Creek Precinct (2.3.2 Objectives)	<p>The Precinct objectives should include language that demonstrates a clear commitment to health and wellbeing in Western Sydney. For example:</p> <ul style="list-style-type: none"> <li>• Support the health and wellbeing of the community by protecting biodiversity, providing opportunities for people to engage with nature and providing spaces for physical activity and recreation.</li> <li>• Support community life by encouraging land uses that promote social cohesion, such as busking, music and cultural festivals, outdoor dining, markets, and infrastructure to enable electric bikes and electric scooters.</li> </ul>
P 21. 2.4 Badgerys Creek Precinct (2.4.2 Objectives)	<p>The Precinct objectives should include language that demonstrates a clear commitment to health and wellbeing in Western Sydney. For example:</p> <ul style="list-style-type: none"> <li>• Support the health and wellbeing of the community by encouraging development that provides employment that is well connected to residential areas, movement networks, services and open space.</li> </ul>
P 22. 2.5 Agribusiness Precinct (2.5.2 Objectives)	<p>The Precinct objectives should include language that demonstrates a clear commitment to health and wellbeing in Western Sydney. For example:</p> <ul style="list-style-type: none"> <li>• Support the health and wellbeing of the community by ensuring local access to fresh foods (e.g. artisan food and drink industry, roadside stalls, markets, edible verge planting).</li> </ul>
P 22	We would like to see active and public transport infrastructure included in plans for the agribusiness precinct. The plan suggests that this precinct will be a major employment area and tourism drawcard, and should therefore be supported by excellent walking, cycling and public transport facilities.
P 23. Second point	We recommend the fresh food hub includes locally-sourced produce from the Agribusiness Precinct and is a source of affordable fresh food for local residents

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	that is not at airport pricing.
P 24. 2.5.2 Objective f.	We recommend the precinct objectives for the agribusiness include traditional Aboriginal food production and education.
P 31. 4.2 Flooding (4.2.2 Performance Outcomes, PO3	It is noted that the DCP says, 'Avoid intensification and new development on land subject to the 1 in 100-year flood event,' which is a lower standard than the Probable Maximum Flood (PMF) originally cited in the Western Sydney Land Use and Infrastructure Implementation Plan (LUIIP). This means that more land will be available for development than would be available if using the PMF. Given that extreme weather events are expected to increase in frequency and severity as a result of climate change, this change from PMF to 1 in 100 may be putting communities at future risk.
P 35. 4.6 Air quality	<p>These objectives only appear to consider sources of air pollution related to the Aerotropolis development (separating sources and sensitive populations). The proposed development will result in a cumulative increase in population and road traffic, which will also contribute to air pollution.</p> <p>Broad measures should also be considered to control air pollution from traffic, such as more public transport and active transport infrastructure, provision of electric charging stations for electric vehicles, and more trees<sup>11</sup>. Controls for wood fire heating should also be considered.</p>
P 38. 5.1.1.1 Urban Design Objectives	<p>We would like to see an objective that supports active travel to school for children in the Aerotropolis. Western Sydney has some of the highest rates of childhood overweight and obesity in NSW. Active travel to school has been identified as an important strategy to address this<sup>12</sup>. New greenfield developments in Sydney's growth areas currently have public schools designed with large intake areas that preclude active travel to school due to large travel distances for many students. Example objectives are:</p> <ul style="list-style-type: none"> <li>• 80% of dwellings are located within 800 metres of a local primary school<sup>13</sup>.</li> <li>• Schools are located close to public transport and on active transport (walking and cycling) networks.</li> </ul>
P 38-39 5.1.1.2 Urban Design Performance Outcomes	We endorse these Performance Outcomes which are supportive of health and wellbeing outcomes, including increased incidental physical activity and social connectivity.
P 40-41. 5.1.2.2	We endorse these Performance Outcomes, in particular P013 which considers

<sup>11</sup> Abhijith K V et al. 2017. Air pollution abatement performances of green infrastructure in open road and built-up street canyon environments. Atmospheric Environment 162, pp71-86.

<sup>12</sup> <https://www.health.nsw.gov.au/heal/primaryschools/Pages/children-active-travel.aspx>

<sup>13</sup> [https://cur.org.au/cms/wp-content/uploads/2019/10/urban\\_livability\\_checklist4pp-a3-aw-002.pdf](https://cur.org.au/cms/wp-content/uploads/2019/10/urban_livability_checklist4pp-a3-aw-002.pdf)

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	<p>the Western Sydney Street Design Guidelines.</p> <p>In regards to Performance Outcome PO2, we would like prioritisation in order of listing, i.e. pedestrians are highest priority for street design, followed by cyclists and then public transport.</p> <p>In regards to Performance Outcome PO6, we would like this to also include drinking water stations.</p> <p>Finally, Performance Outcome PO9 seems to be a repetition of PO8.</p>
P 44. Private open space	We recommend that common and private open space is also designed to accommodate all ages, including children and seniors.
P 45. 5.1.5.2	In regards to Performance Outcome PO3, we would like to see plans for lighting on all active transport networks (walking and cycling), to support access to active travel for night-time uses and events.
P 47. 5.1.7.1 Objectives	We would like to note that any reuse of stormwater, wastewater or recycled water should be treated to a standard appropriate for the end use, to ensure protection of public health.
P 48. 5.1.7.2 Performance Outcomes – Water Sensitive Urban Design	<p>To ensure the water quality supply is appropriate for the end use, we recommend additional wording to the performance outcome. Proposed additional wording is underlined below:</p> <ul style="list-style-type: none"> <li>PO1 - Achieve an integrated land use planning approach to the provision of potable and recycled water and the management of wastewater and stormwater, <u>treated to an appropriate standard where applicable, suitable for the end use.</u></li> </ul>
P 65. Dictionary: Integrated water cycle management	<p>Construction of new, or modification of existing waterways, water bodies, water storages, stormwater or recycled water infrastructure should be designed so as not to produce mosquito breeding habitats. Advice on mosquito breeding habitat can be sourced from references such as <i>LIVING WITH MOSQUITOES: In the Lower Hunter and Mid North Coast Region of NSW</i><sup>14</sup>.</p> <p>We recommend amending the definition for 'Integrated Water Cycle Management' to ensure the water quality supplied is appropriate for its end use. Proposed additional wording is underlined below:</p> <p>'An approach to the management of water that considers aspects of water including rainwater, stormwater, groundwater, water supply and use, reuse and treatment <u>that ensures the water quality is fit for purpose for its end use.</u>'</p>

<sup>14</sup> LIVING WITH MOSQUITOES: In the Lower Hunter and Mid North Coast Region of NSW 2nd Edition 2009 Department of Medical Entomology The University of Sydney & Westmead Hospital Westmead. <http://www.hnehealth.nsw.gov.au/hnep/mosquitoes/Documents/living-with-mosquitoes-dec09.pdf>