

Ms Carolyn Whitten
Acting Manager Sustainable Growth
Planning
Wollondilly Shire Council

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Dear Ms Whitten

Thank you for the invitation to provide feedback on an amendment to the Wollondilly Local Environment Plan 2011, in conjunction with the Macquariedale Road, Appin Planning Proposal.

The Vision of South Western Sydney Local Health District (SWSLHD) is 'Leading care, healthier communities'. We aim to work with others to create social and physical environments that are healthy and support healthy activities so that individual, families and communities can enjoy the best health possible. Our comments below are intended to assist you in formulating policies and guidelines in relation to planning for South West Sydney in ways that support the community to lead healthy lives and be healthy.

The proposal will enable low and medium density residential development, protect ecologically valuable land and protect land required for the proposed future Appin Bypass, and is consistent with the growth planning principles outlined in the Wollondilly Community Strategic Plan 2033.

We are supportive of the extensive community consultations that have taken place and note the changes made to the planning proposal which have taken into consideration community feedback.

We support the proposed protection of ecologically valuable lands and the securing of conservation lands as part of the bio-certification process. We would like reassurance that the 54 hectares of secured conservation land is not risked by further proposed development in the Greater Macarthur Land Release Investigation Area in the West Appin area.

The following comments and recommendations are made regarding the Planning Proposal for rezoning of land located at Macquariedale Road, Appin and the Development Control Plan (DCP) 2016, site specific controls.

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

Section/Heading/Page Number	Comments/Recommendations
B3.5/ SEPP55... Land/p19 and "Appendix R"	The residential component of this Planning Proposal (PP) is located on land previously used for agricultural purposes. The possible need to remediate contaminated land, including asbestos contamination, is prevalent. See Appendix R" of PP and p20 of PP which notes that more detailed site investigations are required to ascertain contamination levels and steps for remediation.
"Potential... Conflict" p33	A commercial poultry farm is located approximately 1km from the northern boundary of the PP site. Residential complaints against such commercial poultry farms typically will include a focus on odour, noise, night lights, visitations of heavy haulage vehicles and dust. It is not clear that the present thick vegetation will be sufficient to shield the PP site from such activity. There is also no guarantee that the vegetation will be preserved into the future as a shield against the commercial poultry farm.
"Water Quality" p44	The PP site is described as not located so as to affect water catchment zones. The PP warrants that "appropriate storm water management controls" will ensure the good water quality of the Upper Nepean River Catchment. There is not, however, any reference to specific detail to support such warranty.
"Traffic"/p45	It is noted that Appin Road is a major state (RMS) road showing traffic growth and requiring upgrades. The impacts, such as noise and air pollution, upon the PP site of traffic growth and unchecked road deterioration are not addressed within the PP.
"Appin Bypass"/p45	It is noted that land previously reserved for the proposed Appin Bypass, is now zoned for environmental conservation. This re-zoning will not prevent RMS from constructing the Appin Bypass in the future and there appears no certainty with respect to the impact of traffic upon the PP site into the future.
"Traffic and Transport"/p47	The proposal acknowledges an infrequent bus service currently operates between Campbelltown and Wollongong. The PP is estimated to increase the local Appin population by some 666 new residents (p12) to a population of around 3300. Additional bus services need to be planned from the outset to avoid social isolation, car dependence and road congestion. We would like to see evidence of active negotiation with the bus company, including projected frequency of bus services where the PP proceeds to completion.

"Metropolitan... Sydney (Metro 2036)"/ p16	Location of at least 80% of the site within the walking catchment of existing urban community services within the town centre of Appin is commendable and detail of associated shared paths and pedestrian cyclist linkages within the DCP is noted.
"Metropolitan... Sydney (Metro 2036)"/ p16	The PP states that it will not impact upon agricultural land (eg. pp 16, 19, 28, 29) and so not impact upon food security. Yet the PP also states that the land has "historically been used for... agricultural purposes": Appendix A. The PP could include a community garden for fresh local produce to somewhat offset the agricultural heritage to be displaced by the PP.
DCP 2016 Vol.3/p4-5	In order to achieve objective 8 'to reduce the impact of climate change', we recommend the Controls include reference to the Government Architect New South Wales' future Greener Places policy ¹ .
DCP 2016 Vol.3/p5	The DCP document presents opportunity for 'narrower than typical Appin streets, one way configurations and rear laneways' as part of its Controls. There is concern that narrowing the width of the streets will impede access by emergency service and rubbish collection vehicles, particularly in areas of greater housing density where there is likely to be more on-street parking. As the area under proposal is also close to bushland and the risk from bushfires is high, it is recommended that the relevant emergency services and RMS are consulted regarding optimal street widths or alternative ways to manage potential issues ² if such Controls are to be implemented.

In making these comments, we have relied on a wealth of evidence from Australia and overseas that provides guidance on ways in which the built environment can promote people's physical, mental and social health and wellbeing. Should you wish to consult some of this evidence, useful summaries are provided in:

1. The NSW Healthy Urban Development Checklist – available at:
<http://www.health.nsw.gov.au/urbanhealth/Pages/healthy-urban-dev-check.aspx>
2. Healthy Built Environments. A Review of the Literature, produced by the Healthy Built Environments Program at UNSW – available at:
<https://cityfutures.be.unsw.edu.au/research/city-wellbeing/city-wellbeing-resources/literature-review/>

¹ <http://www.governmentarchitect.nsw.gov.au/thinking/greener-places>

² http://www.rms.nsw.gov.au/trafficinformation/downloads/ttd_2014-004.pdf

We appreciate the opportunity to comment on these planning documents and are keen to continue to work in partnership with you. If you would like to discuss our submission further, please contact Dr Stephen Conaty, Director Population Health on 8738 5718 or Stephen.Conaty@health.nsw.gov.au.

Regards

A handwritten signature in black ink, appearing to read 'Amanda Larkin', with a stylized flourish at the end.

Amanda Larkin
Chief Executive

Date: 19/2/18