



SWD22/129047

Mr Adrian Hohenzollern  
Director, Metro West  
NSW Department of Planning and Environment

Email: [Adrian.Hohenzollern@planning.nsw.gov.au](mailto:Adrian.Hohenzollern@planning.nsw.gov.au)

Dear Mr Hohenzollern

Thank you for the opportunity for South Western Sydney Local Health District (SWSLHD) to comment on the Appin (Part) Precinct Planning Proposal.

The Appin (Part) Precinct will have a significant impact on the growing population and subsequent needs for health infrastructure across the Macarthur region.

While acute health needs of Wollondilly residents are serviced by Campbelltown Hospital, Appin (Part) Precinct will emphasise the need for additional community-based health services.

SWSLHD has long-held planning for a network of integrated community-based health facilities to service the growing needs of south west Sydney populations. In addition, SWSLHD continues to develop virtual and outreach models of care to support the growing communities.

SWSLHD recognises that the built and social environment significantly influences health and wellbeing outcomes and seeks to highlight and address opportunities to improve future sustainability, liveability, and equity through this planning proposal.

Please find attached a detailed list of comments and recommendations on Appin (Part) Precinct Planning Proposal.

Should you wish to discuss this submission further, please contact Mandy Williams, Acting Director Population Health, SWSLHD on 8738 5718 or [mandy.williams@health.nsw.gov.au](mailto:mandy.williams@health.nsw.gov.au).

Yours sincerely

Sonia Marshall

Acting Chief Executive

Date: 20/1/2023

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

Page Number/ Section	Comments/Recommendations
Health Services	<p>Appin (Part) Precinct will have a significant contribution to the cumulative impact of housing developments and growing populations and subsequent needs for health infrastructure across the Macarthur region. Public transport provision may impact access to health services which will largely be located in district and regional centres.</p> <p><b>Hospital Services</b></p> <p>Acute health needs of residents in Wollondilly are serviced by Campbelltown Hospital. Campbelltown Hospital is the primary referral hospital for the Macarthur region comprising the Local Government Areas (LGA) of Camden, Campbelltown and Wollondilly. The \$632 million Stage 2 redevelopment of Campbelltown Hospital was completed in 2022 including expanded surgical and medical services, mental health services, paediatric services and emergency department services.</p> <p><b>Community-based Health Services</b></p> <p>SWSLHD has long-held planning for a network of integrated community-based health facilities to service the growing needs of south west Sydney populations.</p> <p>In 2022, NSW Health submitted a WestInvest Business Case for a network of Integrated Community Health Hubs across SWSLHD. Funding has not yet been committed for the development of an expanded network of community-based health facilities to service the health needs of the growth areas across SWSLHD.</p> <p>The basis for the Business Case is detailed clinical services planning by SWSLHD for a model of Integrated Community Health Hubs (ICHH) delivering a comprehensive range of clinical services to support 'stepped-up care' for local primary care providers and, where possible, outreach models of care for clinical services traditionally delivered from hospital sites.</p> <p>The ICHH approach aims to provide innovative and evidence-based care close to homes and transport links. The contemporary approach of the ICHH provides 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. In addition, SWSLHD continues to develop virtual care and integrated, digitally-enabled models to deliver care close to home across the region.</p> <p><b>Shared Service Delivery Models</b></p> <p>As part of SWSLHD's planning for community-based services, shared service delivery models have been considered particularly for developing areas of population and to support communities as social infrastructure is established.</p>

	<p>As the population develops in Appin (Part) Precinct, shared service delivery models must be considered for accommodation of outreach health services within community infrastructure.</p> <p><b>Primary Care Services</b></p> <p>Consultation with the South Western Sydney Primary Health Network is recommended regarding the requirement for general practitioners to service the incoming population.</p>
Employment lands	<p>The SWOT analysis within the Greater Macarthur Employment Lands Study identifies weaknesses including significant separation from current urban front, limited existing amenities, and limited public transport provision. It does not however identify the current weakness that Wollondilly is already under resourced in terms of its employment offer for local residents, with only one job for every 2 working residents within the Shire. Two thirds of residents work outside the LGA, and with the LGA being geographically large, this means most of its residents are already required to travel long distances for work.</p> <p>The Appin planning proposal introduces greater numbers of residents without commensurate local employment opportunities, which will force even more residents into cars to travel long distances for employment. This urban sprawl continues to drive down liveability and health outcomes for people in Western Sydney.</p> <p>We do not believe the planning proposal goes far enough in addressing these weaknesses, especially regarding public transport provision, which will struggle to be viable or sustainable with the low-density plans on exhibition.</p> <p>While the large population on completion is considered an opportunity within the Study, we also see this as a threat, as it will require increased provision of local employment opportunities spread across a greater area to ensure high liveability for residents, which isn't viable or sustainable with the low-density sprawl proposed.</p> <p>The Planning Proposal identifies economic competition with the adjacent centres as an issue to be avoided, but neglects to recognise that in avoiding this issue it forces future residents into long commutes, which is directly in contradiction to the Greater Cities Commission's 30-minute city strategy.</p>
State Environmental Planning Policy (Precincts—Western Parkland City) 2021	<p>We strongly recommend that the future Appendix for Appin (Part) Precinct Plan within the State Environmental Planning Policy (Precincts—Western Parkland City) 2021 uses the templates used for Appendix 5 Camden Growth Centres Precinct Plan and Appendix 6 Campbelltown Growth Centres Precinct Plan.</p> <p>These aims in appendices 5 and 6 more comprehensively reflect the desired liveability and sustainability outcomes needed for Greater Macarthur and in particular Appin.</p> <p>Recommended Aims for Appin (part) Precinct Plan within SEPP are as follows:</p>

	<ul style="list-style-type: none"> <li>(a) to make development controls that will ensure the creation of quality environments and good design outcomes</li> <li>(b) to protect and enhance environmentally sensitive natural areas and cultural heritage</li> <li>(c) to provide for recreational opportunities</li> <li>(d) to provide for multifunctional and innovative development that encourages employment and economic growth</li> <li>(e) to promote housing choice and affordability</li> <li>(f) to provide for sustainable development</li> <li>(g) to promote pedestrian, micromobility and vehicle connectivity</li> <li>(h) to minimise the impact on existing and future communities of the full range of risks posed by natural hazards such as bushfires and flooding</li> <li>(i) to provide integrated water management</li> </ul>
<p>Sustainable development for Greater Macarthur</p>	<p>Sustainable development is vital for future health and wellbeing outcomes for people living and working in Greater Macarthur.</p> <p>With most new housing in the greenfield growth areas in South Western Sydney being certified by private certifiers and not going through council development assessment processes, it is vital that the tools used by certifiers are meeting higher standards required for improved liveability, better health and wellbeing outcomes and to mitigate against climate change impacts.</p> <p>We strongly recommend that the Department of Planning and Environment revisit their Design and Place SEPP to strengthen liveability and sustainability standards including improvements to NSW's BASIX building sustainability standards.</p> <p>The financial and health impacts of not improving these standards are already being realised. Communities are experiencing poorer health outcomes directly related to the built environments in which they are living, and the NSW government is experiencing unsustainable increases in healthcare costs.</p>