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13<sup>th</sup> June 2017

To whom it may concern,

**RE: Explanation of Intended Effect - Amendments to State Environmental Planning Policy (Sydney Region Growth Centres) 2006 – For North West Priority Growth Area**

Western Sydney Local Health District (WSLHD), Centre for Population Health would like to thank the Department of Planning and Environment for the opportunity to provide a response to the *Explanation of Intended Effect - Amendments to State Environmental Planning Policy (Sydney Region Growth Centres) 2006 – For North West Priority Growth Area* (NWPGA) and associated amendments to the *Growth Centres Development Control Plan* and *North West Exhibition Maps*.

Population Health understand that the proposed amendments to the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (Growth Centres SEPP), if accepted, will enable actions, from the NWPGA Land Use and Infrastructure Implementation Plan (referred to as the Implementation Plan) to be implemented.

Population Health wishes to respond to the following intended effects, of the proposed amendments to the Growth Centres SEPP<sup>1</sup>:

- 'Make the *Land Use and Infrastructure Implementation Plan 2017* the "structure plan" for the North West Priority Growth Area'
- 'Set minimum and maximum densities for all residential areas that have been rezoned under the Growth Centre SEPP'
- 'Set minimum subdivision lot sizes in all residential areas that have been rezoned under the Growth Centre SEPP, and minimum lot sizes for some residential land uses consistent with the standard instrument local environmental plan' and
- 'Consolidate six existing precinct plans in the Blacktown Local Government Area into a single Blacktown Growth Centres Precinct Plan'

**'Make the *Land Use and Infrastructure Implementation Plan (2017)* the "structure plan" for the North West Priority Growth Area':**

Population Health supports the replacement of the current *North West Structure Plan 2006* with the *North West Priority Growth Area Land Use and Infrastructure Implementation Plan (2017)*, as updates to the planning framework are required, in light of the extent of urban development and demand for housing that has occurred in the NWPGA since 2006.

Population Health supports the vision and objectives of the *Land Use and Infrastructure Implementation Plan 2017* (the Implementation Plan). This recognises the importance of providing "vibrant and liveable neighbourhoods"

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<sup>1</sup> Department of Planning, Explanation of Intended Affect – Amendments to State Environmental Planning Policy (Sydney Region Growth Centres) 2006 – For North West priority Growth Centre, p4

with diverse housing choices, local employment, improved transport (including walking and cycling) accessibility and connectivity to reduce car reliance, green corridors and local and regional open space<sup>2</sup>.

Housing and employment are important social determinants of health<sup>3</sup>. Significant evidence exists to show that increased housing density, (if done well), available and accessible active transport options, and access to quality green and open space can have significant population health benefits<sup>4</sup>, in terms of increasing physical activity, social connection and the mental health and wellbeing of the community.

Population Health is however concerned that delivery of residential housing ahead of infrastructure, particularly transport (including active transport) and open space infrastructure will negatively impact the health of residents. Sufficient evidence exists to show that a decline in incidental physical activity, such as walking and cycling for transport, impacts on population-wide physical activity levels and contributes to the current high rates of chronic disease such as cardiovascular disease and diabetes<sup>5</sup>.

The Implementation Plan acknowledges the need for coordinated delivery of infrastructure but focuses primarily on early delivery of utility infrastructure (electricity, water and sewerage infrastructure). The early delivery of transport and open space infrastructure are also essential. Existing transport infrastructure is limited and cars are the dominant transport mode<sup>6</sup>. "It will be important to establish an attractive public transport network from the outset so that new residents coming into the area can make considered mode choice decisions. Earlier introduction of public transport services, rather than relying on passenger demand to grow in the absence of an attractive service is preferred"<sup>5</sup>.

Additional open space needs have been identified across the North West Priority Growth Area (NWPGA) to ensure "the majority of residents are within 400 m of an area of open space"<sup>7</sup>. The delivery of RE1 Public Recreation zoned land "alongside the residential development rather than after development has been completed"<sup>8</sup> will be essential. However, identification of the necessary land and funding required to purchase open space is likely to take time. Embellishment of existing open space facilities and utilisation of facilities in adjoining areas, linked by suitable public transport, are recommended<sup>7</sup>. Most new social infrastructure will only be developed once there is "demonstrated need"<sup>9</sup>, requiring residents in the meantime to access existing infrastructure, most of which is outside the NWPGA, often between 5 and 10 km away.

Timely delivery of the preferred Integrated Transport Plan<sup>10</sup>, including "fine" local bus, cycling and walking networks and regional transport connections, alongside residential development will be critical to providing access to open space and social infrastructure, achieving the objective of reducing car reliance and preventing a decline in the physical activity of residents.

**Set minimum and maximum densities for all residential areas that have been rezoned under the Growth Centre SEPP and set minimum subdivision lot sizes in all residential areas that have been rezoned under the Growth Centre SEPP, and minimum lot sizes for some residential land uses consistent with the standard instrument local environmental plan.**

Population Health supports the introduction of defined minimum and maximum densities. Establishing density maximums will assist with planning and delivery of the infrastructure needed to support the size of the population.

<sup>2</sup> Department of Planning and Environment, North West Land Use and Infrastructure Implementation Plan, May 2017 (p3)

<sup>3</sup> Australian Institute of Health and Welfare, Australia's Health 2016, Australia's health series no. 15. 2016 (Ch 4.1)

<sup>4</sup> UNSW, Healthy Built Environments, A Review of the Literature Fact Sheets.

<sup>5</sup> 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*, 2014-17. 2<sup>nd</sup> edition.

<sup>6</sup> Department of Planning and Environment, The North West Priority Growth Area Structure Plan View Exhibition Draft Report – Integrated Transport and Land Use Planning, November 2016 (p48)

<sup>7</sup> Department of Planning and Environment, North West Land Use and Infrastructure Implementation Plan, May 2017 (p37)

<sup>8</sup> Department of Planning and Environment, Priority Growth Areas Open Space Audit – North West Area, April 2016 (p41)

<sup>9</sup> Department of Planning and Environment, North West Growth Centre Social Infrastructure Assessment, September 2015

<sup>10</sup> Department of Planning and Environment The North West Priority Growth Area Structure Plan View Exhibition Draft Report – Integrated Transport and Land Use Planning, November 2016

The proposed minimum and maximum densities can help to deliver densities needed for viable public transport, as outlined in The North West Priority Growth Area Structure Plan View Exhibition Draft Report – Integrated Transport and Land Use Planning.

Evidence exists showing that higher density living can support health but only when near high quality public transport, local centres, employment, green and open space and social infrastructure in an area perceived to be safe and of high quality<sup>11</sup>. A 2012 evidence review commissioned by the National Heart Foundation of Australia on ‘maximising the health benefits and minimising harm’ of increasing density, indicates that the level of density for optimal health outcomes varies for different groups<sup>12</sup>. Mid-rise housing (no more than 3 to 5 stories) are better for families and older adults, while high-rise housing (more than 5 stories) may be better suited to employed adults with no children, living in high socio-economic areas with good amenity and security. To maximise the health benefits for residents and to assist with local level planning, maximum densities levels especially in areas of up to 100 dwellings/ha will need to be considered in the context of the likely make-up of residents.

In the NWPGA higher densities are generally located close to local centres and rapid transport stops, or proposed stops (Marsden Park)<sup>13</sup>. Allowing this density at Marsden Park could help support early delivery of rapid transport (initially a rapid bus system)<sup>14</sup>.

Timely delivery of transport and open space infrastructure, alongside residential development will be critical to achieving higher density environments that support health.

**Consolidate six existing precinct plans in the Blacktown Local Government Area into a single Blacktown Growth Centres Precinct Plan**

Population Health supports this consolidation of the precinct plans as a practical approach to assist with integrated and timely delivery of open space, public transport, cycling, walking and social infrastructure. Population Health also supports the aims of the consolidated precinct plan to create quality environments, provide recreational opportunities, employment, diverse housing, promote pedestrian connectivity and provide transport infrastructure.

Population Health supports the delivery of healthy liveable environments for the residents of the NWPGA. This can only be achieved through delivery of transport and open space infrastructure alongside residential development. Through its existing relationships with Blacktown City Council and The Hills Council, Population Health will support the planning and delivery of the “fine” local details and networks for open space, walking and cycling infrastructure in the NWPGA.

Population Health again thanks the Department of Planning and the Environment for the opportunity to respond.

Yours sincerely



Ms Christine Newman  
Acting Director Centre for Population Health

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<sup>11</sup> Heart Foundation, Does density matter? 2014

<sup>12</sup> Giles-Corti, B., Ryan, .K, Forster, S., 2012 Evidence Review: Increasing density in Australia: maximising the health benefits and minimising harm. Commissioned by the National Heart Foundation of Australia

<sup>13</sup> Proposed Residential Density Ranges – North West Priority Land Release Area Map

<sup>14</sup> Department of Planning and Environment, The North West Priority Growth Area Structure Plan View Exhibition Draft Report – Integrated Transport and Land Use Planning, November 2016