Wollondilly Health Alliance

Eleanor Robertson
Director, Western
Department of Planning, Industry and Environment
GPO Box 39 Sydney NSW 2001

Attn: Gwenda Kullen

Dear Ms Robertson,

Public Exhibition of Wilton Growth Area Draft Wilton Development Control Plan (DCP)

Thank you for the opportunity to provide comment on the Draft Wilton Development Control Plan. The Wollondilly Health Alliance (WHA) was formed in 2014 with the aim of improving the health outcomes of Wollondilly residents. The Alliance consists of a number of working groups, one of which is the Health in Planning Working Group (HiPWG), co-chaired by South Western Sydney Local Health District, Wollondilly Shire Council and the South Western Sydney Primary Health Network. The WHA recognises that the built and social environment can significantly influence health outcomes, and the HiPWG is therefore focused on integrating health considerations into Council planning processes to create healthy, liveable and connected communities.

SWSLHD commissioned UNSW's Centre for Health Equity Training, Research & Evaluation (CHETRE) to undertake a research project to develop a Health Assessment Protocol (HAP) designed to support the integration of health into council planning processes. The HAP tool has been used to inform the attached table of recommendations designed to provide constructive feedback on the Draft Wilton DCP.

We support the Department of Planning, Industry & Environment's (DPIE) initiative in embedding a range of health considerations in the draft DCP, such as connectivity, walkability, social cohesion, housing choice, heat mitigation and placemaking. We note the user-friendly format, in particular the integration of explanatory diagrams to convey complex planning and design matters.

The WHA is keen to work with DPIE to ensure that Wilton Growth Area achieves the best possible health outcomes for residents, local workers and visitors.

Should you require further information, please contact Maria Beer (co-chair, WHA HiPWG) on 02 8738 6037 or via email maria.beer@health.nsw.gov.au.

Regards,

Michael Malone
Acting Chief Executive Officer
Wollondilly Shire Council
Chair, Wollondilly Health Alliance
Date: 18.09.19

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

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Wollondilly Health Alliance (WHA)

Comments on Draft Wilton Growth Area Development Control Plan

Section	Subsection	Comment	Why is this important?
2.10 Noise Control		All these measures are reactive. Consider including measures to encourage overall reduction of noise at source.	Noise can have a negative effect on human health, in particular contributing to higher stress levels, hearing impairment, cardiovascular disease, sleep and mental ill-health. Evidence suggests that the location, design, construction and quality of housing affect mental health, rather than density per se. [1] It is therefore important to carefully consider potential health impacts when making decisions around the location of future housing.
	Controls	A control should be included that requires applications for noise-generating development (such as roads and rail infrastructure) to consider and minimise their noise impacts on the surrounding area.	With the exception of source-based interventions, the controls appear to be broadly consistent with the WHO Environmental Noise Guidelines for the European Region (2018), which are evidence-based and considered equally applicable to the Australian context.
	Controls – 3	WHA supports this emphasis on green infrastructure.	
2.11 Air Quality Setbacks		Consider including a control promoting the use of trees and other green infrastructure to protect air quality in residential and community areas.	Just as with noise, exposure to poor air quality can have a negative impact on human health and wellbeing. While reducing the impact of air quality by using setbacks is to be commended, the WHA would suggest strengthening the DCP to discourage placement of these facilities in areas exposed to higher levels of air pollution. Asthma prevalence rates for Wollondilly residents are slightly higher compared to the rest of NSW (11.9% compared to 10.9%)[2]. Minimising exposure to poor air quality will be especially important in supporting a

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			'healthy' Wilton as the area is likely to be populated predominantly by young families with children.
	Table 5	Consider linking these setbacks to an evidence base such as the WHO Air Quality Guidelines so that they keep pace with global best practice.	
	Controls – 4	Should childcare centres, hospitals and aged care facilities be permitted adjacent to rail lines?	
3.1 Residential density and subdivision		Application of a minimum density (rather than just a maximum) is a positive step.	As well as providing housing choice and improving affordability, housing density can bring with it a range of health benefits, including higher rates of walking and cycling across all age groups (when people live within close proximity (400-800m) of a mix of destinations). [3] It is important that developers are cognisant of the issues that can emerge in poorly designed and constructed medium/high density dwellings. 'Density Done Well' can have a positive impact on health and wellbeing with residents tending to walk more and use their cars less. [4]
3.1.1 Residential density	Objectives	Please add objective explicitly referring to healthy design/healthy placemaking principles.	The success of implementing policies to increase population density, and to achieve its associated health benefits, depends on three important factors: - The building (its location, construction, design, management and maintenance) - The socioeconomic and cultural make-up of residents and the local neighbourhood - The quality and amenity of the neighbourhood environment.[5]

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			The Heart Foundation website resource 'Healthy Active by Design' provides a practical guide to incorporating health and physical activity into the design of the built environment. http://www.healthyactivebydesign.com.au/ 'Healthy Placemaking' has been defined as: *"Tackling preventable disease by shaping the built environment so that healthy activities and experiences are integral to people's everyday lives"* [6]
	Objectives	Please add objective (or expand objective c) referring to enhanced walkability, opportunities for social connection, and access to services.	Designing neighbourhoods to encourage people to walk creates opportunities for social interaction, and helps promote a sense of community, social capital and social cohesion. [7]
	Controls – 4	WHA supports the goals around non-residential development (in residential areas), particularly the aim of reduced motor vehicle use.	Studies have repeatedly shown that urban sprawl – as characterised by low densities, long and winding street networks, and separated land uses decreases local walking and increases vehicle miles travelled.[8]
3.1.2 Block and lot layout	Objectives – a	Suggest '…encourages walking and cycling *both recreationally and for transport purposes*.'	Being located in well connected, walkable areas where accessibility, shade and comfort have been considered will encourage greater overall use (and therefore walking and cycling for transport). [9] [10]
	Objectives – e	We support the inclusion of this objective to encourage housing choice and create attractive streetscapes.	Housing choice is important in supporting housing affordability, particularly important in Wollondilly where there is currently a lack of housing choice, with a predominance of low density, separate dwellings.

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	Objectives – i	Commitment to tree canopy is positive, but could be more thoroughly and clearly reflected in controls.	Street trees (including those on private property) can encourage more people to walk to local destinations such as parks and local shops rather than using private vehicles thus increasing incidental activity for residents.[11]
	Controls – Blocks – 1 & 3	Emphasis on pedestrian connectivity is supported.	Designing neighbourhoods to encourage people to walk creates opportunities for social interaction, and helps promote a sense of community, social capital and social cohesion.[12] In newly established communities there is an opportunity for residents to establish healthy behaviours early in the life of the development. People living in walkable neighbourhoods are on average 3kg lighter than those in non-walkable neighbourhoods [13]
	Controls – Blocks	'Existing mature trees are to be retained **where possible**.' Consider strengthening and clarifying.	See comments above (3.1.2 - objective i)
	Controls – Lots – 13	These measures are consistent with good outcomes on social determinants of health; consider making brief explicit mention of the rationale for each measure so as to better link to objectives.	
3.4.1 Street layout and design	Objectives – a	Foregrounding of non-motorist uses is good.	We know that people are more physically active within a neighbourhood when they feel safe and are protected from traffic.[14] Benefits of a more walkable community include less congestion around shopping centres and schools and a more connected and socially cohesive community. [15]

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	Objectives – d	Consider making explicit reference to the link between interesting and attractive landscapes and health and wellbeing.	A visually appealing, shaded and well connected streetscape encourages more active lifestyle choices for residents. [16]
	Controls – 7	Continued emphasis on pedestrian and cycling connectivity is good.	As above (3.4.1 objective d)
	Controls – 18	Emphasis on street trees is good, as is clarity around expectations.	See comments regarding tree canopy above (3.1.2 objective i)
4.1.3 Sustainable building design	Objectives	Consider adding a point about promoting health and wellbeing.	
4.2.1 Summary of key controls	Table 11 – Solar access	Table refers to 'at least 70% of the proposed dwellings', but it appears that there are no solar access requirements for the PPOS of the remaining 30% of proposed dwellings.	Ensuring good solar access to private green space is important, especially where private space is limited by lots size and housing density. Evidence from the UK suggests that people who live in areas with more green spaces, including private gardens, had lower mental distress and higher well-being. [17] We know that exposure to natural environments appears to restore and benefit mental health. [18]
4.2.2 Streetscape and architectural design	Objectives – a	Consider adding a phrase about enhancing health and wellbeing.	
	Controls – 1	Consider explicitly stating the rationale of improving and safeguarding thermal comfort (and associated physical and mental health benefits).	Mitigating urban heat effects is important for supporting the health of the population as extreme heat is associated with increased morbidity and mortality. Older people, young children and people with chronic disease are particularly vulnerable to extreme heat.[19] Dwellings that are well insulated result in lower heating and cooling costs for residents and can help mitigate heat-

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			related deaths and a range of health conditions including Blood pressure and upper respiratory tract infections [20,] hypertension, sinusitis and general health [21] as well as self-related health, wheezing, absenteeism, and visits to a general practitioner. [22]
4.2.3 Front setbacks	Objectives	Add, 'To encourage planting and maintenance of trees on private property,' or similar.	Trees can drop temperatures by up to 8˚C, reducing air conditioner use and carbon emissions by an estimated 12-15% per annum. [23] The more street trees along the footpath network, the more likely residents are to walk for 60 minutes each week[24]
4.2.4 Side and rear setbacks	Objectives	Add, 'To encourage planting and maintenance of trees on private property,' or similar.	See comments above (4.2.3 Front setbacks)
	Controls	Add control requiring retention of trees where possible.	See comments above (4.2.3 Front setbacks)
4.2.6 Landscaped area	Objectives – b	Consider adding explicit reference to shade.	See comments above (4.2.3 Front setbacks)
4.2.8 Garages, site access and parking	Controls – 2	Consider revisiting residential parking space provisions in five years once some development has occurred.	If public transport provision is adequate, 2 car spaces for every 3-bedroom dwelling is excessive. However, it is acknowledged that Wilton is a growth area and it will take some time for adequate public transport to come online (and that this parking rate is consistent with other growth areas such as Oran Park).
4.2.9 Visual and acoustic privacy	Figure 33	Use of natural barriers (e.g. trees) is good.	
	Controls – 5	Consider emphasising the importance of minimising sound transition for mental health.	Higher housing quality is consistently associated with psychological health. [25]

Section	Subsection	Comment	Why is this important?
	Controls – 7	Consider reducing the hours in which noise from electrical, mechanical or hydraulic equipment or plant is permitted.	These requirements appear to be less stringent than the restrictions on noise from residential premises in the *Protection of the Environment (Noise Control) Regulation 2008*. (See also earlier comments on health impacts of noise.)
	Table 15	These criteria are consistent with the WHO Environmental Noise Guidelines for the European Region (2018), which is good to see.	
4.3.3 Secondary dwellings, studio dwellings and dual occupancies	Objectives	Consider adding retention of Principle Private Open Space (PPOS) as an objective.	See comments above (4.2.1 – table 11)
	Controls	Consider providing guidance on retention of PPOS.	See comments above (4.2.1 – table 11)
	Controls – 3	'Solar access to the principal private open space of neighbouring lots is **not significantly reduced**.' Consider being more specific.	See comments above (4.2.1 – table 11)
4.3.5 Controls for residential flat buildings, manor homes and shop top housing	Objectives	While accessibility for people with disability is covered in a range of other applicable documents (including the Federal Premises Standards, the Australian Adaptable Housing Standard and the NSW Apartment Design Guide), it is positive to see it addressed explicitly here.	
4.4.1 General requirements	Objectives – d	Good that cumulative impact of non-residential uses is considered here.	
4.4.2 Centre-based childcare facilities	Site selection and location	Consider promoting location near related facilities such as schools (to reduce car trips).	Well connected, walkable areas where accessibility, shade and comfort have been considered will encourage greater overall use (and therefore walking and cycling for transport). [26] [27]

Section	Subsection	Comment	Why is this important?
	Site selection and location – 2	Consider adding reference to vulnerable groups that may be disproportionately affected.	
	Matters for consideration - 4	Consider adding proximity to educational facilities and pedestrian connectivity to residential development.	See comments above regarding (4.4.2 Centre-based childcare facilities)
	Documents to be submitted with development application – acoustic report	Consider whether the acoustic report should also consider impact of noise generation from surrounding area on children's health and wellbeing in the childcare centre.	
4.4.3 Educational establishments and places of worship	Objectives	Consider adding explicit mention of health and wellbeing.	
	Controls – 5	Add walkability to homes as a consideration (preferably higher up the list than car parking).	See comments above 4.4.2
	Controls	Consider adding measures for retention of trees.	See comments above 4.2.3
4.4.4 Neighbourhood shops	Controls	Consider swapping the order of 13 and 14 so that bicycle parking is considered prior to car parking.	
5.2 Smart places	Objectives	The foregrounding of health and wellbeing is a positive step.	

Schedule 1 – South East Wilton Precinct			
Section	Subsection	Comment	Why is this important?
2.1 The South East Wilton Precinct - Vision	Opening paragraph	Should explicitly include promotion of health and wellbeing as a goal/action.	
	Final paragraph	'…alternative transport options' is a car-centric framing of the options. Consider using different language to promote active and public transport as the default option.	
2.2 Referenced figures	Figure 2-5	Public transport plan does not show rail corridor, which could potentially have a substantial impact on long-term public transport provision.	29% of public transport users achieve ≥30 minutes of daily physical activity solely by walking to and from public transport [28]
	Figure 2-6	Open space plan – shared path network appears extensive and well thought out.	A number of infrastructure, programs and policies have been shown to increase cycling. These include on-street markings and cycle lanes, bike share stations, separate cycle ways, improved traffic safety [29]
2.5 Precinct road hierarchy and pedestrian cycle network		Emphasis on pedestrian and cycling movement is good to see. 'Road hierarchy' could instead be called 'movement hierarchy' (in line with NSW Government Architect Movement & Place Framework).	https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/other/framework-better-placed-aligning-movement-and-place-2019-06-27.pdf?la=en
2.5.2 Pedestrian cycle network plan	Objectives	Explicit prioritising of pedestrian and cycling movement is very positive.	
2.6.1		Formatting error: document has two sections called 2.6.1.	
	Controls	Consider including a requirement that any acoustic report demonstrate consistency with the WHO	The WHO Guidelines are considerably more up-to-date than the Department of Planning's 2008 Interim Guideline.

2.6.1 Acoustic amenity and precinct interface		Environmental Noise Guidelines for the European Region (2018).	
	Controls – 4	This should be part of Control 3.	
2.8 Development near coal seam gas wells	Opening paragraph	Typo – strange sentence fragment after opening paragraph.	
2.9 South East Wilton Precinct Local Centre	Desired future character	'Car parking will not detract from the amenity or aesthetic of the Local Centre.' There do not appear to be any objectives or controls to deliver on this statement.	

Schedule 2 – North Wilton Precinct			
Section	Subsection	Comment	Why is this important?
2.1 The North Wilton Precinct – Vision	Key objectives	Should explicitly include promotion of health and wellbeing.	
2.2 Referenced figures	Figure 2-5	Public transport plan does not show rail corridor, which could potentially have a substantial impact on long-term public transport provision.	See comments above for Schedule 1 – SE Wilton section 2.2
3.2.2 Pedestrian cycle network plan	Objectives	Explicit prioritising of pedestrian and cycling movement is very positive.	See comments for Wilton DCP (section: 4.4.2)
3.3.3 Acoustic amenity and precinct interface	Controls	Consider including a requirement that any acoustic report demonstrate consistency with the WHO Environmental Noise Guidelines for the European Region (2018).	The WHO Guidelines are considerably more up-to-date than the Department of Planning's 2008 Interim Guideline.
	Controls – 4 & 5	These should be part of Control 3.	

3.4 Special Urban Areas	Controls – 4	The specificity of these tree retention controls is excellent, and it would be good to see this level of rigour applied elsewhere.	See comments for Wilton DCP (sections: 3.1.2 & 4.4.3)
3.5 Lakeside activity hub development principles	Objectives	Should explicitly include promotion of health and wellbeing, but it is noted that the objectives listed deliver positive outcomes in terms of the social determinants of health.	
3.6 Local Centre development principles	Objectives	Should explicitly include promotion of health and wellbeing, but it is noted that the objectives listed deliver positive outcomes in terms of the social determinants of health.	

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