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Dear Ms Woodruff

I write in response to a call for submissions relating to the revised Blackwattle Bay State Significant Precinct. The Sydney Local Health District supports the major regeneration of the Blackwattle Bay and overall is supportive of the redevelopment of this precinct.

Whilst the revised Master Plan and planning control documents have addressed some of the previously raised concerns of the District, it is recommended that further consideration of the following issues be considered:

Further review of building heights and density reductions

The proposed reduction in density by 15% with approximately 34,500m² less gross floor area and the reduction in new residents by 29% (840 fewer residents from exhibited plan) is supported. This reduction may support the partial mitigation of health issues that are associated with extreme high density living, in particular social isolation and anxiety that impacts mental health.¹

The design excellence process should not be optional for this site.

The open space strategy is supported, however the Precinct remains isolated from surrounding neighbourhoods

The improved open space strategy and widened promenade and boardwalk is supported and will enable an active precinct and lifestyle, including activities for all ages - carers with prams and walking, and is consistent with enabling healthy lifestyle and living within the precinct.

However, the amended plan does not adequately address concerns about walking and cycling access to the surrounding neighbourhood. The Precinct will be partially isolated from the surrounding neighbourhood by busy roads with intersections/slip roads requiring multiple crossing movements and long waiting times.

¹ Lai, Ka Yan, Sarika Kumari, Chris Webster, John Gallacher, and Chinmoy Sarkar. "Associations of neighbourhood housing density with loneliness and social isolation: a cross-sectional study using UK Biobank data." *The Lancet* 398 (2021): S60.

The amended plan does not include the reopening of the Glebe Island Bridge, though this has been referenced within the draft White Bay Precinct plans and is supported. The reopening would further support movement between surrounding neighbourhoods.

A higher proportion of affordable housing, and the addition of social housing

The provision for affordable housing is supported, however the proposal that this would amount to only 7.5% of the total residential and commercial gross floor area or a monetary contribution is not considered adequate.

It is recommended that a minimum of 25% of gross floor area of affordable housing be approved for this publicly owned site. The commitment to affordable housing will support the area to retain a socioeconomically diverse population and provide opportunities for essential healthcare workers and others to access affordable housing, for example those employed at Royal Prince Alfred Hospital and community health services.

Affordable living opportunities will also support one of the key objectives of the Tech Central Innovation Precinct to attract and retain the best and brightest young people to the Precinct.

Social housing is not provided for within this proposal and is recommended for inclusion into the Blackwattle Bay planning at a minimum of 15% of gross floor area. There is a significant lack of social housing for vulnerable communities within the Sydney metropolitan area. Poor access to housing has a major impact on mental and social health, contributes to homelessness and impact negatively on the capacity of acute and community health service provision. Public lands provide an ideal opportunity to support social housing.

This redevelopment could potentially assist in addressing the significant demand for both affordable and social housing.

The strengthened commitment to Aboriginal culture and designing with Country

A strong commitment to Aboriginal culture and designing with country supports the health and wellbeing of Aboriginal people, for whom country is a part of their identity.

A further reduction of private vehicle reliance

The reduction in vehicle spaces by 37% is supported, however further reductions of private vehicle reliance is recommended.

- The proposed car parking will generate additional traffic and associated noise, air pollution and road trauma.
- The development will be well serviced by significant public transport networks including a light rail station and the future Pyrmont Metro Station.
- Numerous economic/social/education opportunities and services are located within walking/cycling distance.
- Construction of off-street parking is costly, with those costs being passed onto homeowners/renters, compounding housing affordability issues.

Exposure to traffic related air pollution has been shown in epidemiological and clinical studies to be associated with a range of cardiovascular and respiratory health outcomes². There is no evidence of a threshold below which exposure to traffic related air pollution are not associated with adverse health effects. Therefore, it is important that all reasonable measures are taken to minimise exposure to traffic related air pollution where feasible and reducing car parking within the precinct will limit traffic related air pollution that is already significant arising from the Western Distributor.

Further modelling of noise and associated mitigation strategies

Compliance with the NSW Department of Planning and Environment *Development near rail corridors and busy roads*³⁴ – interim guideline to ensure noise levels and air quality guidelines are met in the precinct. The siting of buildings adjacent to the Western Distributor was identified in the first stage of feedback as requiring additional mitigation strategies to ensure the health issues associated with pollution and noise were reduced. There is growing evidence of the negative health impacts of environmental noise.

Noise modelling has not been updated and the apartments abutting the Western Distributor will require significant mitigation measures due to the growing evidence of the health impacts of environmental noise, which is strongest for cardiovascular disease and sleep disturbance. Measures to limit community exposure to noise are therefore important to protect public health and SLHD strongly recommends compliance with NSW Department of Planning and Environment *Development near rail corridors and busy roads*⁵⁶ – interim guideline as well as taking into account EPA's NSW Road Noise Policy and Rail infrastructure noise guidelines.

Further investigation of air quality within the Precinct

Within Attachment 12 Air Quality Response, SLR it is reported that some sensitive residential receivers will be located closer i.e. within 20 metres, to the pollution source than they were in the original design. This relates to the repositioning of residential floors within the two northern buildings on private land. This is inconsistent with the goals set at the outset of the precinct planning that are guided by NSW Department of Planning and Environment *Development near rail corridors and busy roads - interim guidelines*⁷ that require that the sensitive receivers need to be 20 metres from the road source to ensure adequate air quality for sensitive receivers.

² Khreis, Haneen, Charlotte Kelly, James Tate, Roger Parslow, Karen Lucas, and Mark Nieuwenhuijsen. "Exposure to traffic-related air pollution and risk of development of childhood asthma: a systematic review and meta-analysis." *Environment international* 100 (2017): 1-31.

³ RMS Guide to Traffic Generating Developments (2002) <https://roads-waterways.transport.nsw.gov.au/business-industry/partners-suppliers/documents/guides-manuals/guide-to-generating-traffic-developments.pdf>

⁴ RMS Technical Direction 2013/04a: Guide to Traffic Generating Developments – Updated Traffic Surveys (2013) <https://roads-waterways.transport.nsw.gov.au/trafficinformation/downloads/td13-04a.pdf>

⁵ RMS Guide to Traffic Generating Developments (2002) <https://roads-waterways.transport.nsw.gov.au/business-industry/partners-suppliers/documents/guides-manuals/guide-to-generating-traffic-developments.pdf>

⁶ RMS Technical Direction 2013/04a: Guide to Traffic Generating Developments – Updated Traffic Surveys (2013) <https://roads-waterways.transport.nsw.gov.au/trafficinformation/downloads/td13-04a.pdf>

⁷ <https://www.planning.nsw.gov.au/-/media/Files/DPE/Circulars/2021/PS-21-018-Development-near-rail-corridors-and-busy-roads--interim-guideline.pdf?la=en#:~:text=roads%20%E2%80%93%20interim%20guideline-,The%20Development%20near%20rail%20corridors%20and%20busy%20roads%20%E2%80%93%20interim%20guideline,on%20road%20and%20rail%20infrastructure.>

The SLR identifies two mitigation strategies:

- Mechanical ventilation for apartments facing the Western Distributor with fixed glazing to the east and operable windows to non-impacted facades; and
- Reducing the number of apartments facing the Western Distributor by designing building cores to the east.

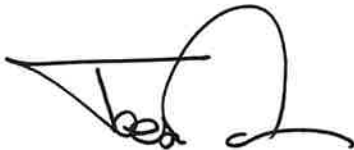
The use of mechanical ventilation as the sole strategy to mitigate the potential health effects resulting from exposure to projected levels of air pollution above acceptable guideline levels due to close proximity to the pollution source (Western Distributor/Anzac Bridge) is not supported. This particularly relates to the three northern most buildings identified within the precinct plans which are located on private land.

Further investigation of air quality is recommended to ensure mitigation strategies support health and wellbeing for residents and workers. Air pollution modelling data has been based upon two monitors, one sited within Rozelle and one temporary monitor at the White Bay cruise terminal. The location of these monitors does not reflect the air quality of the Blackwattle Bay Precinct now or into the future. The District recommends further investigation of baseline air pollution within Blackwattle Bay, by undertaking additional monitoring based on the precinct site, and would welcome the opportunity to review the outcomes of any air quality assessments conducted prior to and during the development construction stages.

Thank you once again for the opportunity to provide feedback to the planning for the Blackwattle Bay Precinct community. The District welcomes future opportunities to contribute to the planning for the Precinct given the impact of the environment on the health and wellbeing of the local community.

Should you require any further information, please do not hesitate to contact Dr Pam Garrett, Director Planning, Sydney Local Health District, 9515 9517 or 0477 333 863.

Yours sincerely



Dr Teresa Anderson AM
Chief Executive

Date 8-9-22.