

4 March 2020

182754

Western Sydney Planning Partnership
PO Box 257
Parramatta NSW 2124

Dear Planning Partnership,

SUBMISSION ON THE WESTERN SYDNEY AEROTROPOLIS PLANNING PACKAGE

We are writing on behalf of the Anglican Church Property Trust Diocese of Sydney (ACPT) in relation to its landholdings within the Western Sydney Aerotropolis Planning Package (WSAPP). The purpose of the submission is to ensure that the intended planning strategy and statutory framework reflects the ownership and opportunity that the Anglican Church can contribute to the future Western Sydney Aerotropolis.

1.0 ACPT Landholdings and Intentions

The ACPT owns the following sites within the boundaries of the Structure Plan (see **Figure 1**):

- **162 Badgerys Creek Road, Bringelly:** The site is approximately 3.5 ha and contains a residence and cleared land.

The WSAPP identifies the site as being within the Aerotropolis Core. It is located outside of 20 ANEF, and is in close proximity to the 114 ha of government owned land and Stage 1 of the North South Rail Link.

The land was acquired in 2017 with the specific purpose of building a new church to service the future community that will live and work within the Aerotropolis. Approximately 1 ha is required for the future church with the remainder being surplus land that will be necessary to support funding of the construction of the church facilities and also the potential provision of compatible land uses to provide income and to connect with the local community.

- **St James Luddenham, 3101-3125 The Northern Road, Luddenham.** The site is approximately 4 ha and comprises a locally listed church, cemetery and bushland area.

The WSAPP identifies the site as being within the Agribusiness Precinct but is zoned Environment and Recreation.

The building will continue to be used by the Parish of Mulgoa and will evolve with the community planned around it.

- **Holy Innocent's Rossmore, 120 Rossmore Avenue West, Rossmore.** This site comprises a State heritage listed church, cemetery, hall, rectory and vacant lands. The existing church building has a capacity of 50 and is not well suited to contemporary ministry purposes.

The WSAPP identifies the site as being within the Rossmore Precinct within the 'Flexible Employment' corridor north of Bringelly Road.

The building is currently leased to a Baptist church with the long-term plan to build a new church facility on the surplus land to service the future Rossmore community.

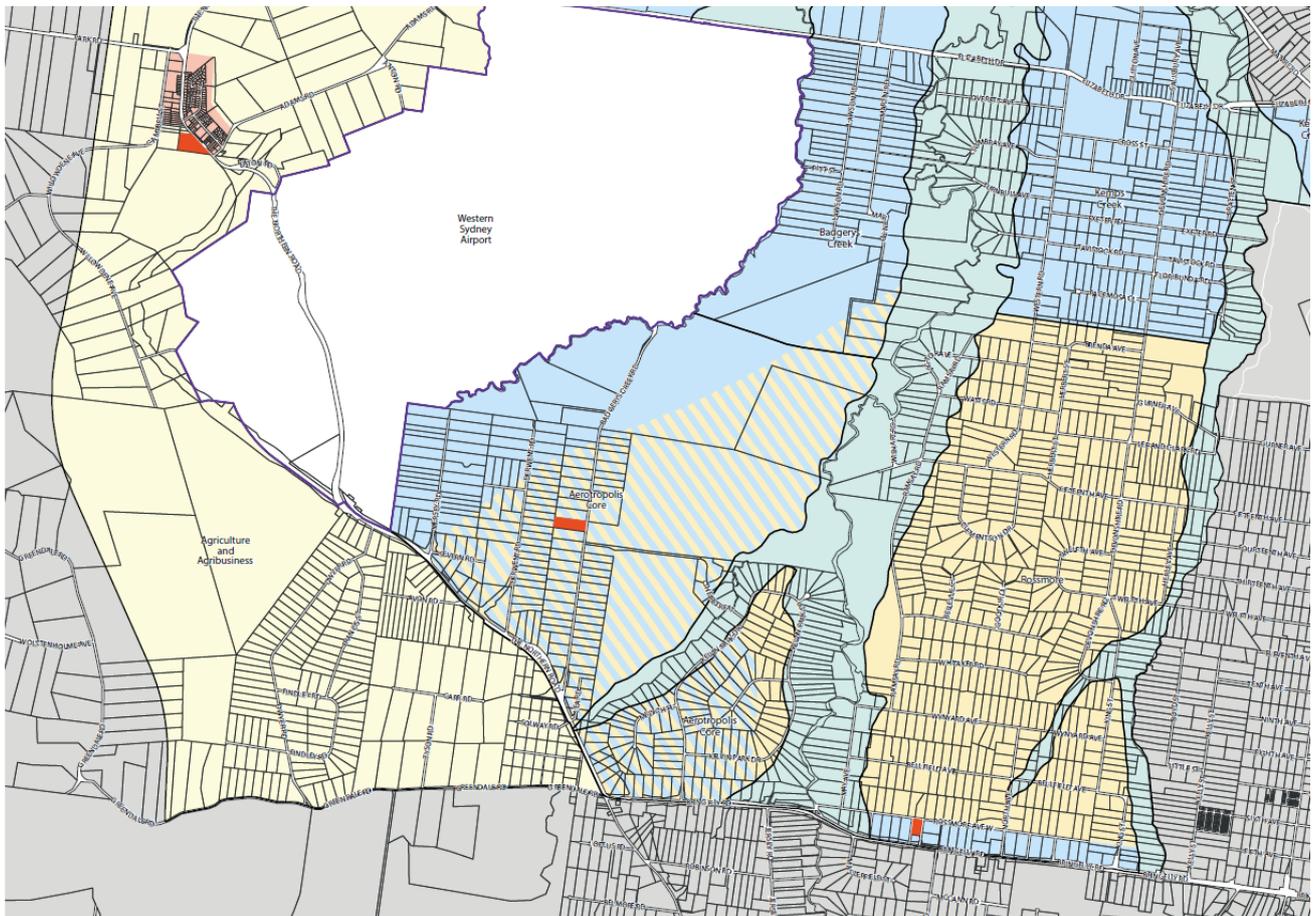


Figure 1 The Stage 1 LUIP with ACPT land shown in red

2.0 Alignment with ACPT and the Western Sydney Aerotropolis

Places of public worship are a key component of the creation of ‘great places’ in Sydney and, around the world. St Andrews Cathedral in Sydney and St Johns Cathedral in Parramatta are the centre pieces of the civic fabric of our Eastern and Central Cities, and have had a significant role in shaping the social and cultural identity of those cities. ACPT, working with the Western Sydney Planning Partnership, can now provide the same infrastructure for our Western City.

More recently, the delivery of New Life Church in Oran Park town is widely recognised as being a contributing factor for the social cohesion and success of Oran Park town.

ACPT’s ownership in the Rossmore and Aerotropolis Core precincts allows for place-based planning to occur up front around this social and cultural infrastructure to ensure that the objective of providing great places, where people have an identity and connection with their community is achieved.



Figure 2 Place of Public Worship at the Centre of Communities

3.0 Site Specific Comments

3.1 162 Badgerys Creek Road

ACPT supports the proposed location of the Aerotropolis Core and the site’s ‘enterprise’ zoning which includes places of public worship as a permissible use amongst other uses.

ACPT requests that the draft precinct planning for the Aerotropolis Core reflects the opportunity created by the location of its landholdings to deliver a new Place of Public Worship and create a community focus and sense of place to the future core.

This could be achieved through recognition of the location of the church and corresponding provision of public open space, public transport nodes, and other civic uses adjacent to the site.

It is noted that the land is not required entirely for church purposes and the Precinct Planning should provide flexibility for the Church to develop other complementary uses on the remainder of its landholdings, which are necessary to fund the construction of the facilities and provide it with additional opportunities to engage with the community.

3.2 St James Luddenham

St James Luddenham forms part of the village of Luddenham and is currently zoned RU5 Village. The Draft SEPP Incorrectly zones the site ‘Environment and Recreation’, which prohibits Places of Public Worship. Whilst the site does contain vegetation, a large portion is cleared and accommodates a church and cemetery which have been in use since 1871.

The vision statement in the Draft DCP states that:

Luddenham Village will be integrated into the Aerotropolis by acting as a vital link between the Airport and this agribusiness precinct. The Village will provide support services to the workers and residents within the precinct.

St James Luddenham currently performs and has a future role in providing the services to workers and residents within the Precinct and should be recognised as part of the Village as per its existing zoning.

Whilst the site is likely to benefit from existing use rights, existing use rights create additional uncertainty for both the public and landowners and could constrain the evolution of the church as the area around it evolves in line with the vision of the WSA. Facilitating the potential growth of the church in the future will be important in ensuring it can continue to remain viable in that location and therefore manage and enhance high ecological and heritage values of the site.

Further, we note the Department’s own position on Existing Use Rights in Planning Circular 06-007, which seeks to avoid drafting LEPs which create existing use rights, stating that:

“Where feasible, councils will be encouraged to identify development that would have existing use rights and include ‘permitted additional uses’ on that land in their LEP, so that the land use is no longer prohibited (in effect, remove existing use rights).”

In light of this, **we request that the structure plan be revised and the site be zoned Agribusiness, which permits places of public worship, consistent with the remainder of Luddenham Village.** We note that any future application that could impact on the vegetated areas of the site would need to assess the environmental impacts of those works at that time.

We note the same Agribusiness zoning should also apply for the Uniting Church land immediately to the north of the site.

3.3 Holy Innocents Rossmore

It is acknowledged that Rossmore is not one of the initial precincts and further planning will be undertaken in the future. Notwithstanding this, ACPT would like to understand in more detail the proposed nature of the ‘Flexible Employment’ zone, which is not clearly expressed in the Plan and is not one of the zones listed in the proposed land use controls. Whilst it is recognised that Bringelly Road will be a major arterial road, it is ACPT’s view that with the future Rossmore Station being immediately to the south, the corridor should be planned as an urban centre around the future public transport infrastructure, such as the Edmondson Park Town Centre, rather than employment land that creates a barrier between the lower density residential areas to the north and the future Station.

Accordingly, ACPT requests that:

- the Structure Plan be revised to create a mixed-use centre around the future Rossmore Station; and
- the future stage of detailed precinct planning reflects the opportunity created by the location of its landholdings to deliver a new Place of Public Worship and create a community focus and sense of place to the future Rossmore centre.

4.0 Future Contribution Framework

ACPT is currently experiencing high levels of uncertainty in relation to development contributions on a number of new church projects, with Council’s in Sydney’s Growth Centres imposing contributions as high as a \$1,033,000 on \$3.75 million projects, with no demonstrated nexus on the demand for infrastructure generated by the project.

Accordingly, ACPT strongly supports the proposal by the Department to develop a comprehensive contributions framework for the future development of the Aerotropolis. It is our view that places of public worship should not have to pay any development contributions as they:

- provide a form of social and cultural infrastructure that contributes to the well-being of society and provide services that reduce the burden on Government;
- do not generate any demands on other social infrastructure;
- are typically attended by people who live in the surrounding areas who have already payed development contributions as part of purchasing or renting housing;
- peak traffic impacts generated by places of public worship occurs on Sundays, outside of peak times; and
- are funded by the generosity of donations from their members.

It is also noted that the significant contribution of places of public worship to social infrastructure in these emerging communities has been acknowledged by the NSW Government decision to exempt places of public worship from payment of the SIC levy.

In light of the above, it is requested that as part of the preparation of the local infrastructure contribution plans that places of public worship be exempt from all development contributions.

ACPT would like to thank the Western Sydney Planning Partnership for providing the opportunity to make a submission on the WSAPP and it would welcome any opportunities to have a role in the next stage of more detailed planning. Should you have any further queries please do not hesitate to contact myself, or [REDACTED].

Yours sincerely,

[REDACTED]

Michael Rowe
Director

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