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Tuesday, 17 March 2020 4:59:07 PM

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Sent: Thursday, 12 March 2020 10:47 AM

To: PPO Engagement <engagement@ppo.nsw.gov.au>; [Redacted]

Subject: FW: Webform submission from: [webform_submission:source-title]

[Redacted]

Sent: Thursday, 12 March 2020 9:54 AM

To: DPE PS ePlanning Exhibitions Mailbox [Redacted]

Subject: Webform submission from: [webform_submission:source-title]

Submitted on Thu, 12/03/2020 - 09:52

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: Gordon

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Submission file:
[Redacted]

Submission: Please find attached a submission on behalf of the Catholic Education Diocese of Parramatta, Catholic Education Office Diocese of Wollongong and Sydney Catholic Schools

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/western-sydney-aerotropolis-planning-package>

12 March 2020

2200059

Greater Sydney Place and Infrastructure
NSW Department of Planning Industry and Environment
GPO Box 39
Sydney NSW 2000

Dear Sir/Madam

RE: SUBMISSION ON CATHOLIC SCHOOLS IN THE WESTERN SYDNEY AEROTROPOLIS

1.0 Introduction

This submission is made on behalf of Catholic Education Diocese of Parramatta, Catholic Education Office Diocese of Wollongong and, Sydney Catholic Schools (collectively known as Catholic Schools) in response to Department of Planning, Industry and Environment's (DPIE) release of the *Western Sydney Aerotropolis Planning Package* (WSAPP) which includes the following documents:

- Draft Western Sydney Aerotropolis Plan (Draft WSAP)
- Western Sydney Aerotropolis Discussion Paper on the proposed State Environmental Planning Policy (SEPP Discussion Paper)
- Draft Western Sydney Aerotropolis Development Control Plan (Draft DCP) Phase 1

Catholic Schools commends the Department on the release of these planning documents and their comprehensive framework. This will ensure that the future planning and development for the Aerotropolis remains a priority for the NSW Government, and will deliver development to support the new Western Sydney International Airport and the broader Western Parkland City. Catholic Schools support a holistic approach to planning and development in the Aerotropolis and seeks to play a major contributing role in achieving the objectives of the Aerotropolis through the provision of education to a wide range of age groups.

This submission will provide an overview of Catholic Schools and the role they will play within the Aerotropolis. The submission will then discuss several key issues associated the Aerotropolis; these include:

- The importance of integrating schools into future precinct and master planning as a central component of key precincts, particularly the Aerotropolis Core.
- The need for a level playing field for school education providers to ensure suitable school sites are able to be procured by all school education providers.
- Proposed zoning provisions in the Western Sydney Aerotropolis State Environmental Planning Policy (SEPP) 2019.
- Proposed zoning provisions in the Western Sydney Aerotropolis Development Control Plan (DCP) 2019
- The relationship with the State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017.

1.1 Overview of Catholic Schools

Catholic Education is the second largest provider of school education in NSW. The Catholic Education Diocese of Parramatta, Catholic Education Office Diocese of Wollongong and Sydney Catholic Schools have a combined 315 schools across NSW. Quality learning and teaching is a core value of Catholic Schools, which they offer from preschool to Year 12. They also have several programs which engage with parishes and the local and wider community. These include volunteering, Vocational Education and Training courses, Post School Pathway Programs, Family Educator Projects and the Duke of Edinburgh scheme. This work creates and sustains valuable links which create mutual benefit for the school and wider community.

Catholic Schools are beginning to incorporate mixed-use precincts into their schools as a means of servicing the needs of the school, its students, families and the wider community.

Examples of this include incorporating any number of the following within a school site:

- A church which is used for school-based purposes and also for serving the local parish community through weekly services. This encourages students and their parents to engage within the Catholic faith.
- Sport and exercise equipment which is used by students during school hours and the local community before and after school. There is also the opportunity to service the wider community by hosting weekly team sporting events on fields or courts provided within the school, that would otherwise go unused outside of school hours.
- Food services that provide food and drinks at any time. They will service the school community by providing lunch to students and catering school-based events. It will also be a place for parents to meet before or after drop-off time.
- Health consultation rooms within the school that aid students with their health needs. This could include a dentist, doctor or counsellor. This is time saving for busy parents that need to drive students from one point to another and reduces the time that students would spend outside of school attending these appointments.
- Church outreach services to provide for a broad range of community needs as may differ from area to area.

The advantages of a mixed use precinct include cost saving benefits and time saving efficiencies. It acts as a means in further integrating the school as an invaluable part of the community.

1.2 Catholic School Sites

Catholic Schools currently own 13 sites within or in close proximity to the Aerotropolis. The sites comprise of the following:

- [REDACTED] William Howell Drive, Glenmore Park (3.11 ha)
- [REDACTED] The Lakes Drive, Glenmore Park (4.58 ha)
- [REDACTED] Minchinbury Street, Eastern Creek (0.07 ha)
- [REDACTED] Willowdene Avenue, Luddenham (3.792 ha)
- [REDACTED] and [REDACTED] Bakers Lane, Kemps Creek (40.8 ha)
- [REDACTED] The Northern Road, Bringelly (2.08 ha)
- [REDACTED] Bellevue Close, North Rossmore (8 ha)
- [REDACTED] Goodsir Close, North Rossmore (2 ha)
- [REDACTED] Bellfield Avenue, Rossmore (8 ha)
- [REDACTED] Seventh Avenue, North Leppington (4.84 ha)
- [REDACTED] Fifth Avenue, North Leppington (0.914 ha)
- [REDACTED] Eleventh Avenue, Austral (13.3 ha)
- [REDACTED] Edmondson Avenue, Austral (1.21 ha)

The proposed primary use on these sites is Catholic schools, with many also being inclusive of a Church and an early childcare centre. Additionally, some sites are currently used as low-density residential dwellings or small shopping villages. The sites are shown in **Figure 1**. Catholic Schools is excited about playing a key role and participating in the growth, development and success of the Aerotropolis, particularly by facilitating schools and associated activities to serve the needs of the people who will live and/or work in the precinct as it grows and develops.

2.0 Key Issues

A review of the Aerotropolis planning documentation by Ethos Urban on behalf of Catholic Schools has identified several issues which may affect the optimal delivery of school education in the Aerotropolis. These issues are discussed in the following sections with recommendations for how they can be addressed in the future planning framework being implemented for the Aerotropolis.

2.1 Importance of Integrating Schools into Future Precinct and Master Planning

Future precinct and master planning within the Aerotropolis needs to clearly consider and incorporate provision for school sites that are well located to serve the needs of residents and workers. In doing this, future planning should account for the various attributes required by a school, and their associated benefits. These include:

- The opportunity to share infrastructure such as open space, car parking and community halls. This has significant cost saving and environmental benefits (both in construction and operation) for people in these communities, State Government and local councils through optimising the use of these facilities and reducing their capital, environmental and on-going cost to the community. There should also be consideration given to designating land use around school sites that can facilitate infrastructure sharing and land use synergies.
- Proximity to public transport and active transport. This encourages walking and cycling which have health, wellbeing and environmental benefits. Additionally, this will reduce car use which increases safety, decreases the need to provide parking spaces and will lessen traffic congestion during school start and finish times.
- Proximity to universities, business and industry. This promotes collaboration opportunities for student learning pathways and for industry support for student activities. It also locates school education close to employment, providing parents with choice of school location and improving the attractiveness of the employment precinct for firms considering locating in the Aerotropolis.
- A school site that is suitable for all stages of learning. This is particularly relevant for Catholic Schools which provide education from early learning (childcare) through to Year 12. There is also the opportunity to provide adult education classes, including Vocational Education and Training (VET).

Future precinct and master planning should incorporate a 'village' model where there is interaction and collaboration in all aspects of land use. This will be a key attractor for international companies and their employees who choose to have their children attend schools that are close to their employment, rather than close to their residency. The absence of numerical housing and population targets in the Aerotropolis Plans is problematic. These targets are key to informing the location of future school sites and their capacity. Future precincts should include a consideration of these targets within each zone, in a short-term and long-term capacity. This will also ensure that adequate community and recreation infrastructure is developed in the desired location. In the short term, this infrastructure should be located in the vicinity of existing school sites in the Aerotropolis. This heightens the opportunity to maximise the sharing of infrastructure and services.

Recommendations:

- Identify suitable school sites within future precinct and master planning.
- Choose sites for schools that are in proximity to community infrastructure, public and active transport corridors, universities and business and industry.
- Ensure school sites can accommodate for all stages of learning.
- Incorporate a 'village' model in future precinct and master planning.
- Locate future community and recreation infrastructure close to existing schools in the Aerotropolis.
- Formulate housing and population targets as part of future precinct planning.

2.2 Need for a Level Playing Field for School Education Providers

All school providers, inclusive of Catholic Schools, are likely to face major disadvantages in finding suitable sites within the Aerotropolis. The proposed broad flexible zoning outlined in the WSA SEPP 2019, will force school providers to compete with major institutional investors for the most optimal land holdings. As a result, school providers may be forced to utilise land in unsuitable or inaccessible locations without intervention at the precinct and master planning stages.

The Aerotropolis Plan framework proposes that the rezoning of land, by way of the Aerotropolis SEPP occur prior to more detailed precinct planning and master planning processes. Suitable school sites however will not be identified through the proposed high-level SEPP rezoning process. Rather, suitable sites will be logically identified as part of the finer grain planning that will take place in the subsequent precinct and master plans. To ensure that these sites are safeguarded and school providers, including the NSW Department of Education, are able to acquire them, the

Aerotropolis SEPP needs clear provisions that ensure that school sites, once identified in precinct plans and master plans, are limited to education and complementary uses as discussed in **Section 1.1** above. This could be by way of a second-stage amendment of the SEPP to rezone of the sites to the SP2 Special Uses Education Establishment zone or to declare the sites by way of a schedule or map with related clauses placing limits on land use.

The Precinct Structure Planning Process in Victoria is a good model in this regard. School sites are clearly identified as “Education Facility” in Precinct Structure Plans and the process requires developers to work with nominated infrastructure providers to ensure the delivery of the school as part of the overall development. Further, Public Private Partnerships (PPP) have been facilitated which involve the financing, design, construction and 25-year maintenance of new schools throughout Victoria. In the most recent example, the Victorian Government entered a PPP with Learning Communities Victoria (LCV). The Government benefited from this deal through the provision of 15 new schools across Victoria. Similarly, LCV benefited from this partnership by co-locating schools close to community infrastructure and services that were owned by LCV, (including early childcare centres, community halls, commercial kitchens and sports facilities). These would be used by the school and the surrounding community, in turn deriving income for LCV. A similar methodology should be adopted within the precinct and master planning process for mixed-use precincts within the Aerotropolis.

The non-government school sector educates more than 35% of school students in NSW and takes considerable financial pressure of the public school sector through its complementary investment in school infrastructure. This is currently not recognised by the NSW Government in Special Infrastructure Contributions (SIC) frameworks. Currently the development industry is able to offset dedication of land /or provision of public school infrastructure from SIC levies. This SIC offset should also be available to developers that provide land or infrastructure for the non-government school sector.

Recommendations:

- Reconsider broad flexible zoning within the mixed-use precincts in the WSA SEPP, particularly their application to community infrastructure land uses such as education.
- Introduce safeguard mechanisms to ensure that schools are able to compete with other developers for suitable sites. This may include a requirement for developers to nominate preferred education providers, and requiring engagement with these providers during precinct planning, master planning and precinct delivery.
- Make provision for developers to be able to be able to achieve SIC offsets for the provision of land or school infrastructure for non-government schools.

2.3 Proposed SEPP Zoning Provisions

The WSA SEPP requires a reconsideration of its current zoning approach, which encompasses ‘closed zones’. It is recommended that the zones, as proposed, be reverted to ‘open’ zones, where the list of permissible uses remains as ‘anything not listed as prohibited’ (and may be permissible without consent if desired). This enables new innovative uses that may evolve as part of the development of the Aerotropolis, that, while not specifically defined per a land use definition (due to the limitations of the Standard Instrument), would still be permissible within the relevant zone, and therefore approvable via a merit-based assessment by the relevant authority. This would avoid time delays associated with amending the permissible land uses in the SEPP every time a new technology or land use is proposed that does not meet established standard template definitions.

This is especially true of schools which have seen significant changes in terms of associated and ancillary uses. For example, new schools (particularly Catholic Schools) are often designed to cater for a wider range of students and age groups. New schools seek to include early education and childcare as well as adult education. This broad range of educational uses needs to be permissible in all zones where educational establishments are permissible. The current SEPP is inconsistent in this regard. Within the Enterprise Zone, school-based childcare is not permitted, despite educational establishments being permissible. Similarly, in the Agribusiness Zone, educational establishments are permissible; however, all forms of early education and childcare are not permitted. Through an open zoning approach, services such as early childcare would be permissible in the Enterprise or Agribusiness Zone. This will further attract international companies and their employees through the provision of early education

through to school-aged education close to their employment. Future SEPP provisions can better accommodate for schools that cater for a wide range of age groups through an open zoning approach

Recommendations:

- Remodel the current zoning provisions to allow for an open zoning approach.
- Allow early education and care facility to be permissible in zones where educational establishments are also permissible.

2.4 Proposed DCP Provisions

The WSA DCP places emphasis on schools being ‘creek orientated’ as one of its performance outcomes (PO5). This is problematic as it has the potential to force schools to locate away from centres and adjacent to public recreation corridors. While co-location with recreational areas is beneficial for schools, there are greater disadvantages associated with being isolated from other important infrastructure such as public transport and services within centres. Proximity to vegetated creeks also correlates with increased bushfire and flood prone land risks. Schools are a vital community asset that should not bear the financial burden of riparian maintenance, building repairs and closure due to bushfire or flood impacts. The emphasis on ‘creek orientated’ schools carries greater risks and more disadvantages than benefits.

The DCP makes no mention of school education or community centres within the objectives for the Aerotropolis Core Precinct, which needs to be readdressed. This is particularly important as the Aerotropolis Core is intended to be Sydney’s third CBD under the Three Cities Model as proposed by the Greater Sydney Commission. Therefore, it is imperative that the emerging city centre incorporates a range of land uses, inclusive of schools. The DCP places significant emphasis on the vision of a “high order employment focused metropolitan centre” including a focus on STEM-focused educational facilities within the Aerotropolis Core. While Catholic Schools understands the importance of STEM, it should be taught as part of a rounded educational experience. This was highlighted by Minister Stokes himself during his previous role as the Minister for Education where he raised concern in a public lecture on STEM being an educational ‘fad’ and encouraged schools to promote a wide range of subjects, including the humanities. Future provisions of the DCP should take this into account and focus on the objective which aims for the Aerotropolis Core to be “vibrant, connected and permeable 24-hour metropolitan city centre.” This can be achieved through community infrastructure and school education within the Aerotropolis Core.

Further, the DCP provisions should exclude school sites from any building height and FSR controls, which can be too restrictive for the operational requirements of a school. Instead, schools should comply with Schedule 4 of the *State Environmental Planning Policy (Educational Establishments and Child Care facilities) 2017*. The Education SEPP provides design quality principles for schools that can inform a merit-based approach. This is less restrictive than the standard building height and FSR controls.

Recommendations:

- School education and community centres within the Aerotropolis Core should be addressed.
- Remove the performance outcome (PO5) in the DCP which places emphasis on schools being ‘creek orientated.’ Instead, include a performance outcome which puts emphasis on schools being co-located with community infrastructure.
- The Aerotropolis Core objectives, while acknowledging the importance of STEM, should place it within the context of a holistic education.
- The DCP provisions should exclude school sites from any building height or FSR controls.

2.5 Relationship with the SEPP (Educational Establishments and Child Care Facilities) 2017

Preparation of the Aerotropolis planning framework included a consideration of existing SEPP’s, inclusive of the *SEPP (Educational Establishments and Child Care Facilities) 2017*. However, the WSA SEPP states that amendments to the Education SEPP may be made so that it aligns with the new zones within the Aerotropolis. The various planning documents fail to clarify what these future amendments may encompass. There has also been little consideration for the need for schools to retain flexibility and planning approvals pathways available under the

Education SEPP, particularly the flexibility provided by Clause 42 for State Significant Development to be able to contravene development standards. The Education SEPP provides the school sector with a clear and consistent framework for the development of schools in NSW that overcomes differences in planning controls between local government areas. This has assisted the sector to plan for future schools and upgrades to existing schools. This consistency should be applied to the Aerotropolis.

It is imperative that future planning provisions in the WSA SEPP are clarified with regard to any amendments that will be made to the Education SEPP and recognise the importance of the existing provisions outlined within the Education SEPP.

Recommendations:

- Clarify the amendments that will be made to the Education SEPP.
- Recognise the importance of flexibility and planning approval pathways and the consistent planning and approval regime provided under the Education SEPP.

3.0 Site Specific Comments

Figure 1 outlines the Catholic School sites that are located within or in close proximity to the Aerotropolis. The sites are discussed below with regard to their context within the Aerotropolis Plan documents:

1. [REDACTED] Willowdene Avenue, Luddenham is the Holy Catholic Family Primary School and is located within the existing village and community of Luddenham. The site (and village) are located within the area which will incur ANEC levels between 20–30. The site is in the proposed Agribusiness Precinct and will be subject to the provisions of the proposed Agribusiness Zone. While educational establishments are permissible in this zone, all forms of early education and childcare are not permitted, presumably due to potential aircraft noise issues. This may have negative implications for the educational offering of the Catholic School in future, if they choose to include early education and childcare as uses within the school site to serve the needs of the Luddenham community. It is recommended that rather than create a prohibition on these important community uses within the agribusiness zone, appropriate noise mitigation and management and management measures be formulated and implemented as part of the Development Control Plan.
2. [REDACTED] Bakers Lane, Kemps Creek is located within the Mamre Road Precinct, which, while still within the Aerotropolis, is proposed to be subject to the land use and planning controls in *State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP)*. An amendment to the WSEA SEPP to rezone the Mamre Road Precinct was recently publicly exhibited and the site is proposed to be rezoned to IN1 Industrial under that process. The Diocese of Parramatta is in on-going consultation with the Department of Planning, Industry and Environment with regard to this site.
3. [REDACTED] Bellevue Close, North Rossmore is located within the Rossmore Precinct which is not proposed to be rezoned as an initial precinct under the Aerotropolis SEPP. Notwithstanding this, the Structure Plan for the Aerotropolis has designated the precinct as “urban land” and proposes that the strategic outcomes include providing for mixed use communities which maximise access to retail, cultural and community services. This is not incompatible with the Catholic Schools’ future plans. The site is not affected by any airport related constraints.
4. [REDACTED] Goodsir Close, North Rossmore is located within the Rossmore Precinct which is not proposed to be rezoned as an initial precinct under the Aerotropolis SEPP. Notwithstanding this, the Structure Plan for the Aerotropolis has designated the precinct as “urban land” and proposes that the strategic outcomes include providing for mixed use communities which maximise access to retail, cultural and community services. This is not incompatible with the Catholic Schools’ future plans. The site is not affected by any airport related constraints.
5. [REDACTED] Bellfield Avenue, Rossmore is located within the Rossmore Precinct which is not proposed to be rezoned as an initial precinct under the Aerotropolis SEPP. Notwithstanding this, the Structure Plan for the Aerotropolis has designated the precinct as “urban land” and proposes that the strategic outcomes include providing for mixed use communities which maximise access to retail, cultural and community services. This is

not incompatible with the Catholic Schools' future plans. The site is not affected by any airport related constraints.

6. ■ Seventh Avenue, Austral is located outside of the Aerotropolis boundary and subject to the planning controls in the Liverpool LEP 2008. Future development of this site for education is likely to also serve residents and workers within the Aerotropolis.
7. ■ Fifth Avenue, Austral is also located outside of the Aerotropolis boundary and subject to the planning controls in the Liverpool LEP 2008. Future development of this site for education is likely to also serve residents and workers within the Aerotropolis.
8. ■ The Northern Road, Bringelly is located outside of the Aerotropolis boundary and subject to the planning controls in the Liverpool LEP 2008. Notwithstanding this, the site is within 2km of the proposed Aerotropolis Core and future development of this site for education is likely to also serve residents and workers within the Aerotropolis.

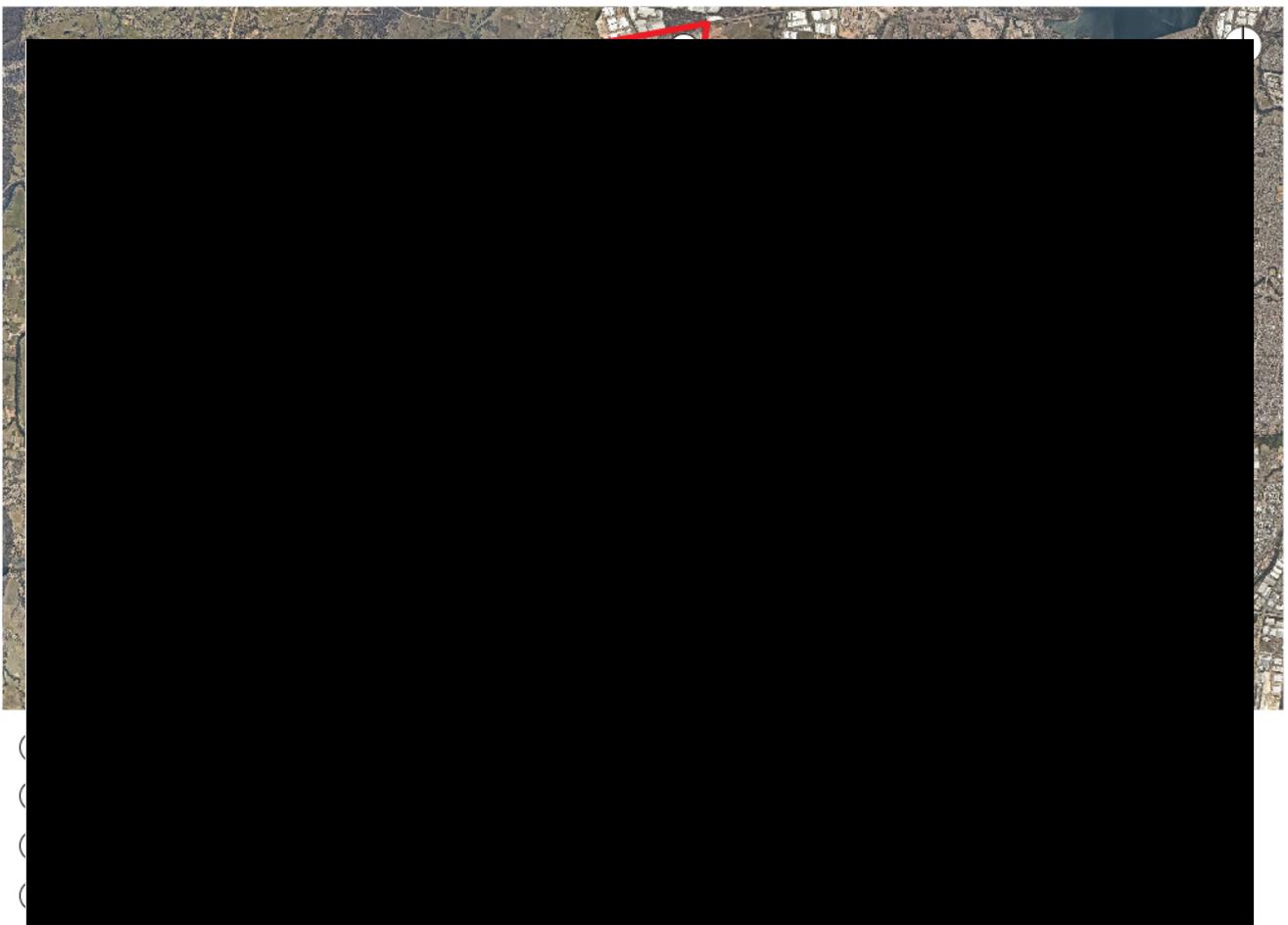


Figure 1 Catholic Schools Sites within the Aerotropolis

Source: Google Maps and Ethos Urban

4.0 Other Issues and Comments

Catholic Schools commends the WSA Plan on its recognition of the rich Aboriginal and Non-Aboriginal heritage within the Aerotropolis. Catholic Schools appreciates the dedication to preserving and activating the various heritage items through framework and controls. Additionally, Catholic Schools also appreciates the commitment to deliver sustainability within the Aerotropolis. Particularly the Blue-Green Grid, which will improve amenity and

liveability and encourage the use of active transport by providing “corridors of private and public open space with active and passive recreation and community facilities.” Moving forward, Catholic Schools looks forward to witnessing the delivery of these commitments to ensure that heritage and sustainability are of the utmost importance during the development of the Aerotropolis.

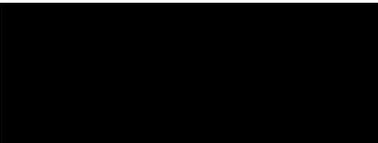
5.0 Ongoing Dialogue

Catholic Schools should be consulted and be given an input in future precinct and master planning. Ongoing dialogue between Catholic Schools and the Department of Planning, Industry and Environment, the Planning Partnership and Western City and Aerotropolis Authority is necessary to ensure that the above issues are considered, and recommendations are taken on board. In this regard, Catholic Schools invite the Department, Planning Partnership and Western City and Aerotropolis Authority to meet with them to further discuss these opportunities at your earliest opportunity.

6.0 Conclusion

Thank you for the opportunity to provide a submission to the planning documents published by the Department of Planning, Industry and Environment in relation to the Western Sydney Aerotropolis. Catholic Schools looks forward to working with the Department to deliver its vision for the Aerotropolis and would welcome any further opportunities to contribute to future precinct and master planning. Should you require any further information in relation to the matters raised in this submission, please do not hesitate to contact the undersigned.

Yours sincerely,



Gordon Kirkby
Director, Planning

