

31 March 2021

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Betts,

**RE: SCHOOL INFRASTRUCTURE NSW SUBMISSION TO
WESTERN SYDNEY AEROTROPOLIS DRAFT PRECINCT PLANS**

School Infrastructure NSW (SINSW), as part of the Department of Education (DoE), welcomes the opportunity to provide comments on the Western Sydney Aerotropolis Draft Precinct Plans (draft WSAPP). SINSW works in conjunction with DoE to ensure every school-aged child in NSW has access to high quality education facilities at their local government school.

SINSW has reviewed the draft Aerotropolis Plans and associated technical reports and provides comments as follows.

Future Education Infrastructure in Urban Release Areas:

Section 3.5.1 of the draft WSAPP outlines the proposed social and cultural infrastructure framework. Requirement SC1 of this section states the following:

“Provide educational uses and schools in the location shown on the Land Use Plan (Figure 30) to ensure appropriate distribution and provision of social facilities”.*

Notably, Table 7 of this section describes the social infrastructure requirements for each Aerotropolis Precinct to be provided by 2036 and particularly specifies the schools infrastructure, including number of teaching spaces, to be delivered.

To plan for schools, DoE considers (amongst other things) long term trends in population growth, the likely uptake of new housing by those with school aged children, the ratio of government and non-government school attendance and the size and location of existing schools. DoE will undertake school planning in the region to better understand where and when additional school provision is required and where the school population is likely to remain stable or decline; so that the most appropriate school asset solutions can be identified. It is likely that the requirements, particularly number of teaching spaces, will change.

DoE will continue to collaborate with the Department of Planning, Industry and Environment (DPIE) and the relevant local Councils regarding future demand for primary school and secondary school students in the area. Infrastructure needs

and costings will be revisited, refined and optimised in subsequent programs and/or project business cases, and an affordability lens will be applied.

SINSW requests that references to the number of teaching spaces and the location of upgrades and new schools be removed from the draft WSAPP and technical reports.

Subdivision and Block Structure

Section 3.4.8 of the draft WSAPP outlines the preferred subdivision and block structure for the precincts. Objective LU04 notes that this is aimed at ensuring “block sizes facilitate good pedestrian and active transport connectivity”.

To this end, Table 6 of the plan proposes a maximum block size of 150x150 for Community Infrastructure and School development. This equates to a maximum area of 22,500sqm (or 2.25ha). This should refer to our minimum required site sizes, of 1.5ha for primary facilities and 2.5 for secondary facilities in low-medium density urban areas.

The delivery of new or upgraded educational facilities is subject to several factors, such as enrolment demand and facility requirements. SINSW is committed to working with DPIE and the relevant councils to ensure that public schools are supporting community needs and continue to be appropriately resourced to respond to student population changes.

Solar Access/Overshadowing:

SINSW notes that the draft WSAPP identifies land surrounding existing and potential school sites as being subject to a maximum building height of between 20 to 70 metres.

Buildings of this height are likely to result in overshadowing. SINSW therefore requests that specific planning controls be considered that will prevent future applications from being lodged and approved for development that will create overshadowing concerns to educational facilities. SINSW seeks to ensure:

- Any existing or new schools within the Aerotropolis and surrounding precincts can comply with each of the relevant controls contained to DoE’s ‘School Site Selection and Development Guide’ (School Guide) and DoE’s ‘Educational Facilities Standards and Guidelines’ (EFSG). This includes compliance with sun access and overshadowing controls contained to the School Guide and EFSG, which aim to ensure that at least 70% of school spaces, including outdoor school play spaces, receive direct sunlight between 9am and 3pm in mid-winter.
- Any future schools within the Aerotropolis can install PV cells on the roof. Rooftop solar panels should not be overshadowed by surrounding development so they can successfully capture sufficient light to feasibly power the school.

Joint/Shared-Use Agreements:

SINSW is supportive of a draft WSAPP objective to create accessible public and open spaces areas. To assist with this objective, SINSW recognises the benefit of working with DPIE to provide joint and shared-use opportunities in the Aerotropolis precincts.

SINSW seeks to explore and implement joint and shared-use opportunities where there is a mutual benefit for the school and community. However, this is subject to timing, funding and a Memorandum of Understanding developed between the parties.

Sydney Metro:

The draft WSAPP highlights the value of the Western Sydney Airport Metro to the sustainable transport network within the WSA. SINSW has provided a separate submission to DPIE regarding possible impacts of these works on SINSW assets, including Luddenham and Kemps Creek Public Schools.

Notwithstanding the above, SINSW acknowledges that at completion, the Metro will likely provide a range of on-going positive outcomes for schools and communities along the proposed alignment, including reducing localised traffic, improving school access, and supporting the promotion of sustainable travel.

SINSW is also generally supportive of the proposed future rail link to connect the proposed Sydney Metro at the Aerotropolis Core station to the existing Sydney Trains Leppington Station. This will also provide a range of connectivity benefits for students, teachers and guardians.

Active/Sustainable Travel:

SINSW notes that increased growth throughout the WSA will place further pressure on the surrounding road network. As a result, it is essential that other modes of travel are catered for.

SINSW is highly committed to supporting initiatives that encourage active lifestyles and sustainable travel to and from schools. SINSW is therefore supportive of the various objectives and requirements contained to the draft WSAPP that seek to deliver a range of public transport, walking and cycling infrastructure for the Aerotropolis precincts.

SINSW recommends that the plan also includes the following additional objectives and requirements to promote greater active and sustainable travel, particularly around school sites within the Aerotropolis precincts.

- A permeable, walkable network with safe crossing points, sufficient footpath width and pedestrian signal phasing to meet travel demand. Pedestrian signal phasing should:
 - Be automatic for pedestrian signals surrounding schools in the 1-hour before AM and 1 hour after PM school bell times.

- Not have double phasing for pedestrian signals during an operational day.
- Wide footpaths and through-paths supported with lighting, way-finding and mature trees, particularly around schools.
- Pram ramps, bus shelters, kerb outstands and refuges crossings, particularly around schools.
- Shared User Paths and scooter/bicycle parking, particularly around schools.
- Lower vehicle speeds around sensitive land-uses, including schools.
- Local area traffic calming, particularly around schools.
- Improved pedestrian access to bus stops and higher bus priority on roads to decrease bus journey times. This includes for school buses.
- Bus shelters for bus stops, including those adjacent to schools.

Infrastructure Delivery:

Table 8 of the draft WSAPP notes the potential creation of a fuel pipeline from the proposed Airport line into the Northern Gateway Precinct. Objective I2 and I6 state the following:

“Development will need to investigate future planned utility infrastructure, including the aviation fuel pipeline”.

“Once a future fuel pipeline is confirmed, the proponent is to undertake a land use safety assessment to determine appropriate buffers to reduce public risk in consultation with the relevant agencies”.

SINSW requires clarification regarding the proposed route of this pipeline. Further, before any further master planning in its vicinity is progressed, consideration must be given to the Hazardous Industry Planning Advisory Papers and AS 2885.1 – 2018.

In regard to future development, all relevant studies must be undertaken to ensure that sensitive land uses and the land uses in general (as proposed) are acceptable given the proximity to the future pipeline. Without this information, SINSW believes there is insufficient information to progress the precinct planning phase.

Infrastructure Contributions:

SINSW notes that a range of infrastructure contribution plans will apply to the proposed future Aerotropolis precinct. These comprise:

- Proposed Special Infrastructure Contribution for Western Sydney Aerotropolis.
 - Proposed by DPIE.
- Draft Aerotropolis Contributions Plan 2020.
 - Jointly proposed by Liverpool City Council and Penrith City Council.

SINSW supports both proposed infrastructure contribution plans for the Aerotropolis precinct, as they both propose exemptions for public schools. An



Education
School Infrastructure

exemption for public schools is considered appropriate given that public schools are essential social infrastructure that is provided for the direct benefit of the community.

SINSW welcomes the opportunity to engage further about all aspects of this submission. Should you wish to get in contact with SINSW or require further information, please contact Lincoln Lawler at [REDACTED] and Katie Weaver at [REDACTED].

Yours Sincerely,



Paul Towers
Executive Director
Infrastructure Planning