

21 December 2020

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

Dear Mr Betts,

**RE: SUBMISSION TO THE DRAFT ILLAWARRA SHOALHAVEN REGIONAL PLAN 2041**

School Infrastructure NSW (SINSW), as part of the Department of Education (DoE), welcomes the opportunity to provide comment on the updated draft of the *Illawarra Shoalhaven Regional Plan 2041* (the Draft Plan).

SINSW notes that a previous version of the Draft Plan was provided to Government Agencies for comment in September 2020, to which SINSW provided a coordinated response to DPIE on Monday 28th September 2020. SINSW remains generally supportive of the actions contained in the Draft Plan, subject to the matters outlined below.

**Population Growth:**

The Draft Plan notes that at least 100,000 additional residents are expected in the Illawarra Shoalhaven region by 2041, which will result in approximately 58,000 additional dwellings. This population growth is distributed as follows:

- Kiama – 3,997 additional residents.
- Shellharbour – 23,571 additional residents.
- Wollongong – 55,375 additional residents.
- Shoalhaven – 17,130 additional residents.

SINSW use population and dwelling projection data provided by the Department of Planning, Industry and Environment (DPIE) as the basis for school planning. This data allows SINSW to assess schools within an area or region to identify the best way to distribute student numbers and deliver new and upgraded facilities.

Population growth at the above locations is anticipated to affect the future student populations of several schools that are located or have intake areas within the above areas. SINSW notes that additional catchment areas may also be indirectly affected by the proposed increase in residential population facilitated by the Draft Plan.

SINSW has determined that a combination of asset improvements and non-asset solutions across multiple schools will likely be required to accommodate the projected enrolment demand resulting from the Draft Plan. These solutions may include:

- Intake area (catchment) boundary changes.
- Additional temporary and permanent teaching spaces on existing school sites.
- Upgrades to existing schools.
- Additional school sites (discussed in further detail below).

SINSW is committed to working with Council to ensure that public schools are supporting community needs and continue to be appropriately resourced to respond to student population changes. SINSW therefore requests that additional consultation between SINSW, DPIE and Council is undertaken prior to the finalisation of the Draft Plan and any future strategic

directions that propose additional residential development in the region. This is to ensure appropriate resourcing is provided for schools to respond to all new population projections.

### **Future Education Infrastructure in Urban Release Areas:**

Objective 18 of the Draft Plan aims to 'unlock housing supply through infrastructure planning'. As previously expressed to DPIE, the framing of this wording may raise the expectation that new schools will be constructed in the nominated areas. This may not be a necessity in all cases, due to capacities in existing schools and the enforcement of the DoE Enrolment Policy (which aims to reduce out of area enrolments).

Further, SINSW notes that the currently exhibited version of the Draft Plan includes a map (page 63) showing existing (and future) school sites in identified urban release areas within the West Lake Illawarra Growth Area. SINSW confirms that the version of the Draft Plan reviewed by SINSW prior to exhibition did not include this map.

The map illustrates future school sites in the Calderwood urban release area (URA) which have been dedicated to DoE through the Voluntary Planning Agreement (VPA) process. However, it does not show or illustrate the undeveloped site in the West Dapto URA already owned by DoE, nor the site identified for a VPA with Wollongong City Council. We ask that a consistent approach of illustrating locations of VPA's is considered.

In the future, SINSW request that the following wording be utilised by state agencies when addressing future education infrastructure within strategic planning documents:

*"State legislation requires the Department of Education to provide public education to every child who requests it. To do so, the Department of Education is required to balance a range of issues within a constrained budget setting, including:*

- *Alleviating areas where demand exceeds supply.*
- *Repurposing existing facilities to suit modern teaching methods.*
- *Optimising the utilisation of existing assets.*
- *Ensuring existing school assets are maintained and repaired to acceptable standards.*

*To plan for schools, the Department of Education 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.*

*The Department of Education 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. The Department of Education will continue to collaborate with the Department of Planning, Industry and Environment and local Councils.*

*As a first preference and where appropriate, the Department of Education will optimise use of existing assets through solutions such as:*

- *Increasing the size, amenity and functionality of existing schools to manage growth whilst providing greater curriculum choices.*
- *Renewing existing assets to provide contemporary teaching spaces for students.*
- *Realigning school intake boundaries to appropriately manage growth where possible.*

- *Managing enrolments to provide priority to students living in the local school intake area.*
- *Using temporary classrooms to manage short term fluctuations in enrolment levels.*

*New schools will only be established where there are no other options available and budget approval has been given. Where new schools are required, the Department of Education will negotiate with housing developers and consult with local councils to place them near transport and town centres and encourage the use of shared amenities including sports fields and halls.”*

#### **Service Need Strategy Collaboration:**

SINSW is supportive of efforts to foster a culture of collaboration between SINSW, DPIE and Council. To this end, it is proposed to include an additional ‘Collaboration Activity’ within the Draft Plan. This item should read as follows:

*“Collaboration Activity #*

*“Continue to work with the Department of Education to ensure the provision of future school assets within the Illawarra-Shoalhaven Region is considered, in particular within identified growth areas.”*

Collaboration of this kind will encourage a whole-of-government approach to strategic planning and optimise the delivery of education infrastructure to support growth and change in the region.

#### **Joint and Shared Use Agreements:**

Objective 14 of the Draft Plan notes the following regarding the shared use of open spaces:

*“Open spaces within school grounds could be shared by the wider community outside of school hours”.*

SINSW is supportive of this statement and recommends that this be expanded into a separate action item under Objective 14 of the Draft Plan. SINSW seeks to explore and implement joint and shared-use opportunities with DPIE and Council 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.

#### **Special Infrastructure Contribution Levy:**

The draft Illawarra Shoalhaven Special Infrastructure Contribution (SIC) has been addressed in conjunction with the Draft Plan. The SIC will *“fund a State and regional roads, public transport infrastructure, pedestrian and cycling paths, health facilities, emergency services, schools and open space improvements”.*

SINSW notes that the SIC proposes to support the delivery of education infrastructure up to \$2,064,290. SINSW supports the use of SICs to provide school infrastructure and recommends that it also includes requirements for the delivery of public domain, sustainable transport and other infrastructure works. These will support high-quality educational facilities within the areas to which the SIC applies.

#### **Traffic Impacts:**

Increased growth in the region will place further pressure on existing transport networks. As such, it is essential that all modes of travel are catered for. SINSW is therefore supportive of Objective 28 of the Draft Plan, which states:

- *“Walking and cycling connections need to be prioritised in a way that maximises accessibility to and from workplaces, educational institutions, public transport stops and stations, and centres”.*
- *“The planning and designing of new communities in West Lake Illawarra and Nowra Bomaderry must connect facilities such as new schools with walking and cycling networks”.*

Notwithstanding this, SINSW recommends that Council consider the following additional actions to encourage and promote active and sustainable travel throughout the region:

- Provision of new and upgraded footpaths.
- Provision of additional pedestrian crossings.
- Provision of new and upgraded cycling lanes.
- Implementation of lower vehicle speeds.
- Implementation of local area traffic calming.
- Provision of improved school bus stop access and higher school bus priority on roads to decrease school bus journey times.

SINSW has been working closely with Transport for NSW (TfNSW) in reviewing and providing insights into the draft Illawarra-Shoalhaven Regional Transport Plan.

**Pipelines:**

SINSW has determined that the region contains various underground gas pipelines. SINSW has also determined that some schools are located within the notification/exclusion zone of these pipelines. SINSW therefore requests that the Draft Plan contains an additional action to review and protect the structural integrity of these pipelines. In addition, SINSW also requests that no potential future gas pipelines are proposed in locations that would consequentially result in a school being located within a gas pipeline notification/exclusion zone.

SINSW would like to work with DPIE and Council on future transport opportunities and strategies for the region, specifically regarding the areas subject to additional population growth. SINSW therefore welcomes the opportunity to engage further on the content contained to this submission.

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Yours Sincerely,



Alix Carpenter  
**Director – Statutory Planning**

Cc: Geoff Waterhouse  
**Executive Director – Infrastructure Planning**