

22 February 2023

Michael Cassel
Secretary
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

CONFIDENTIAL

Attn: Gary Hinder, gary.hinder@planning.nsw.gov.au

Dear Mr. Hinder,

RE: SINSW SUBMISSION – GILEAD STAGE 2 PLANNING PROPOSAL (PP-2022-3978)

School Infrastructure NSW (SINSW), as part of Department of Education (DoE), welcomes the opportunity to provide comments on the Planning Proposal for Gilead Stage 2 (the draft Proposal). SINSW note that the Gilead Precinct has been subject to the Technical Assurance Panel pilot program. SINSW wishes to thank the Department of Planning and Environment (DPE) for its continued engagement to date on this Precinct and the broader development of the Greater Macarthur Growth Area (GMGA).

SINSW understand that the draft Proposal relates to a portion of the Gilead Precinct and seeks to amend the *State Environmental Planning Policy (Precincts - Western Parkland City) 2021* (WPC SEPP) via a new Appendix. The proposal will rezone the site from RU2 Rural Landscape to a mixture of C2 Environmental Conservation, SP2 Infrastructure and Urban Development zone, as well as other amendments. The proposed new zones are accompanied by a structure plan for the site which outlines the indicative intended land uses. The rezoning of the wider precinct will result in a total of 15,000 residential dwellings, with this proposal to deliver approximately 3,300 dwellings.

SINSW notes that the draft Structure Plan identifies one potential school site (refer Attachment A below). The specific location and details of this site will be the subject of ongoing discussions between SINSW, DPE and the developer as detailed planning progresses for the Precinct.

For DPE's reference, SINSW has undertaken a detailed investigation of the long-term service need in for the areas within the GMGA. This has identified appropriate solutions to accommodate future projected enrolment demand in this corridor and ensure that existing schools are fully utilised before new schools are considered.

SINSW has reviewed the planning package in detail and has provided additional commentary in Attachment B below. SINSW welcomes the opportunity to engage further on the draft Proposal and request a meeting with DPE to discuss the content contained in this submission. Should you require further information



Education

about this submission, please contact the SINSW Strategic Planning Team on Strategicplanning@det.nsw.edu.au

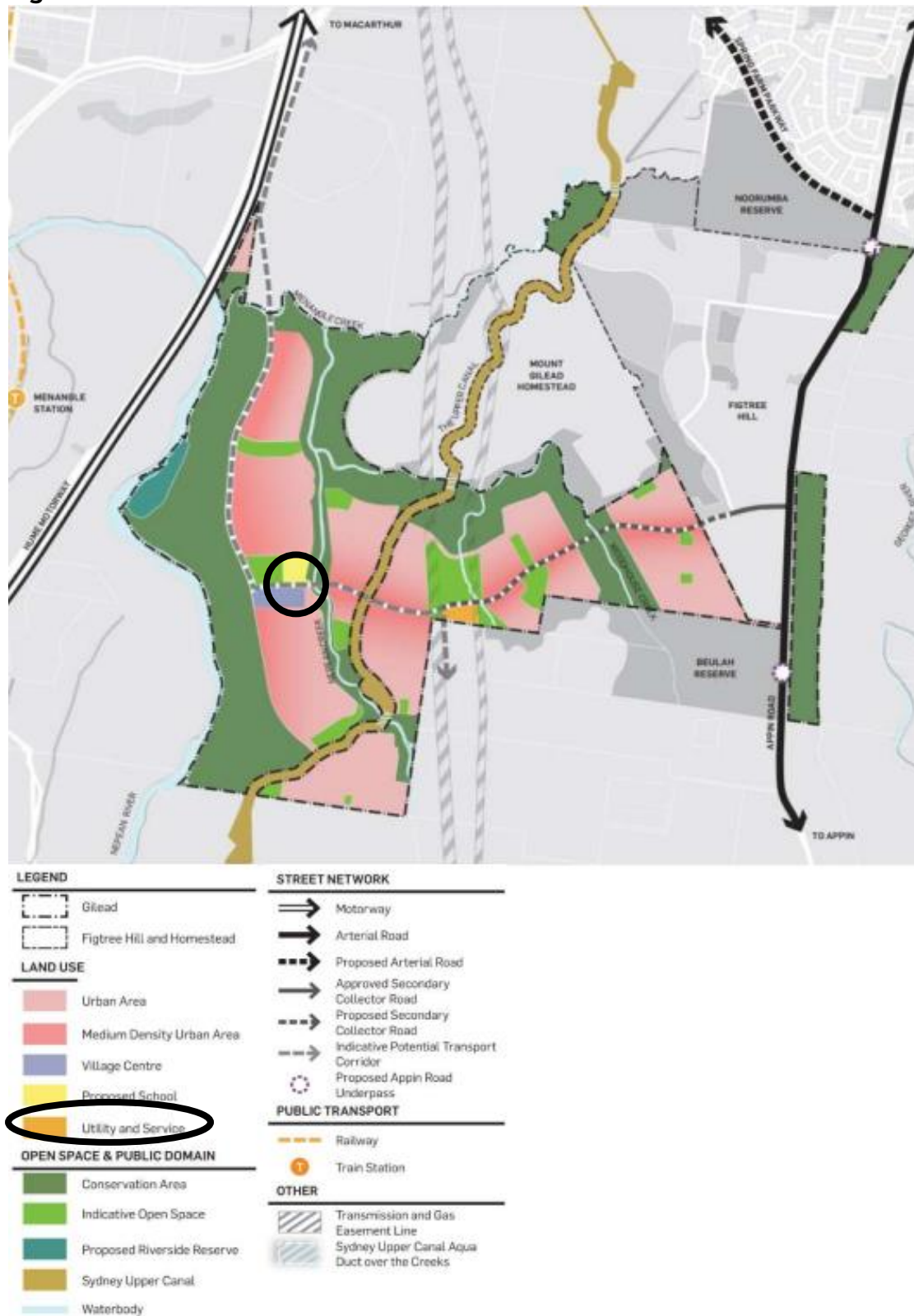
Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Rebecca'.

Rebecca Willott
A/Executive Director, Infrastructure Planning

ATTACHMENT A – SINSW SUBMISSION – GILEAD STAGE 2 PP

Figure 1: Draft Structure Plan



Source: Urbis Pty Ltd (2022)

ATTACHMENT B– SINSW SUBMISSION – GILEAD STAGE 2 PP**Demand for Educational Facilities**

The draft proposal seeks to deliver a total of approximately 3,300 dwellings as part of a wider precinct yield of 15,000. As stated above, SINSW has previously provided preliminary feedback on the service need impact of the wider Gilead Precinct as part of the TAP Pilot Program (June 2022). SINSW note that this advice has been incorporated into the recommended social infrastructure provision for the wider Precinct, which proposes one primary school (2ha).

Noting the location of the subject proposal within the Greater Macarthur Growth Area and its close proximity to other major development projects (North Appin, Appin Part Precinct), SINSW can confirm the Departments previous advice that the combined impact of the draft Proposal and surrounding development will generate enrolment demand on the area's existing school facilities that is beyond the scale of which would reasonably be met through expansion or upgrade of the existing schools. It is likely that the proposed dwelling yield will result in a requirement for at least one primary school. This demand may potentially increase based on development 'creep' and rising government share, since non-government schools are not required to expand as a residential locality develops.

Based on the above, SINSW support the provision of one school site within the study area. This will be subject to funding being secured via either a State Planning Agreement (SPA) or capital allocation from NSW Treasury (as well as the matters listed below).

Please note, these comments are based on the projected population and dwelling yields for the study area and highlight the minimum number of required sites rather than a maximum. DPE and Council have a joint obligation to monitor growth in the precinct and ensure future sites are made available if/when development yield exceeds the approved numbers.

Zoning of Potential School Site

While SINSW's preference is for school sites to be zoned SP2 Infrastructure (due to its impact on land value; a key driver for state government agencies), the proposed zoning identified in the draft Structure Plan is the 'Urban Development Zone'. SINSW understand that this is a broad zone being pursued in the WPC Growth Areas, which permits a range of uses by exclusion. The UD Zone is not identified as a prescribed zone under Chapter 3 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, despite this, SINSW note that educational establishments are captured as permitted development within the current land use table.

Noting the above, SINSW welcome additional consultation with DPE and the proponent regarding the safe-guarding of sites for future educational facilities in the absence of defined zoning and detailed timeframes with which to guide the SINSW site selection process within the Precinct.

Notation and Imagery in Reporting and on Plans

SINSW has reviewed both the draft Structure Plan for the study area and request that any commentary and/or mapping within the proposal package which addresses the potential school sites be amended to refer to this site as:

“Potential education facilities”

The above amendments will account for any required amendments to the proposed school sites locations as planning progresses for the Precinct”.

Assessment of Proposed School Locations & Selection of a Preferred Site

As stated above, the draft Structure Plan identifies one school site in proximity to the proposed town centre. SINSW’s ‘School Site Selection and Development Guidelines’ outline the site-based requirements for any new school site. These have been previously provided to Council and DPE for the proponent’s consideration and are also available at:

<https://www.schoolinfrastructure.nsw.gov.au/news/2021/03/guidelines-for-school-site-selection-and-master-planning.html>

Consideration of these guidelines will ensure that any future educational establishment in the site can operate in an acceptable manner.

In order to progress the detailed investigations required for site selection, SINSW require Due Diligence reporting for the precinct. SINSW can provide greater certainty on the appropriateness of potential sites once due diligence reports are provided and appropriate mechanisms are identified to make these locations suitable for school development.

SINSW request any due diligence conducted in relation to the precinct including but not limited to:

- Topographic Surveys of proposed school sites (including site boundary details and dimensions)
- Foreshore setbacks
- Contamination Reports
- HIPAP 10 Land Use Safety Planning (and any associated reports)
- HIPAP 6 Hazard Analysis
- Traffic and Transport Assessment Report/s (including review of heavy vehicle movements and traffic modelling)
- Flood Study + sea-level rise (if relevant)
- Air quality and odour report/s
- Active transport and pedestrian connectivity overlays
- Heritage (European and Aboriginal Cultural Heritage Assessment)
- Ecological Report

In the absence of the above, SINSW request the most recent Due Diligence reports for the above affectations and access to the precinct to conduct relevant due diligence.

Site selection will also be assisted by detailed layout/structure planning for the Precinct. SINSW request that any work in this regard be provided to the Department for review.

SINSW request that further discussions are held with DPE to ensure that the appropriate site configuration can be achieved in accordance with the above requirements, prior to finalisation of the proposal.

Review of Social Impact Assessment

SINSW has reviewed the Social Infrastructure Assessment (SIA - prepared by Urbis Pty Ltd) and request the amendments noted in the table below. It is noted that this report was discussed with the Department as part of the TAP Process, however, it is preferable that consultants meet with SINSW regarding the content of draft reports prior to exhibition, to ensure consistency with SINSW priorities.

SIA Content	Page	SINSW Recommended Content
<p>Education Facilities</p> <p><i>The Gilead proposal contains an indicative primary school site (2ha), co-located with the local centre.</i></p> <p><i>Table 9 Benchmark demand for new schools – Recommended Provision</i></p>	22	<p>Amend text as follows:</p> <p><i>The Gilead proposal contains an indicative primary school site (2ha minimum), co-located with the local centre.</i></p> <p><i>Provision of two school sites as follows:</i></p> <ul style="list-style-type: none"> ▪ <i>Indicative primary school (2ha minimum) at Gilead</i> ▪ <i>Co-located primary and high school (combined 3.9ha site minimum) at Figtree Hill.</i>
<p>Conclusion and Recommendations</p> <p>Education</p>	29	<p>Amend text as follows:</p> <p><i>Provide up to two primary schools and one high school. Across Gilead and Figtree Hill there are two school sites proposed: an indicative primary school (2ha minimum) at Gilead and a co-located primary and high school (combined 3.9ha site minimum) at Figtree Hill. The initial student population projections for both precincts suggest Figtree Hill could accommodate the additional high school and primary school demand generated by Gilead.</i></p> <p>Insert the following:</p>

		<i>"Future provision of educational facilities in the Precinct will be subject to SINSW's 'School Site Selection and Development Guidelines', which outline the site-based requirements for any new school site as well as ongoing consultation with DPE and the proponent".</i>
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Infrastructure Delivery

Subject to meeting the above requirements, SINSW's preference is for any future school site within the study area to be delivered via a Planning Agreement. It is understood that a draft State Planning Agreement (SPA) is currently being prepared by DPE to support the rezoning. SINSW request an opportunity to review the draft agreement, when available.

If this pathway is pursued, SINSW request that agreement on the timing of transfer of the school sites be determined prior to the Agreement being finalised, as this will depend on the timing of new dwelling delivery and SINSW's regional priorities. As stated above, confirmation of school delivery will also be dependent on completion of required site selection investigations.

Further, as part of any local contribution's arrangements for the proposal, SINSW request that Council consider including requirements for public domain, transport and other infrastructure works required to support government schools in the Precinct in this future plan and that government social infrastructure is expressly excluded from the payment of contributions.

SINSW request that all necessary servicing and transport infrastructure required to support the school site is provided prior to delivery of any educational establishments in the precinct. Timing of the future school site's delivery will need to be developed in consultation with SINSW, subject to the above servicing requirements being met.

Active Transport and Access

SINSW have reviewed the Strategic Transport Review (prepared by Pentelic Advisory) and the letter notes that a detailed Traffic and Transport Assessment (TTA) for the Gilead Priority Precinct will need to be undertaken to as part of the future master planning process. This will be comprised of two phases, being a macro and micro level assessment. SINSW request to be consulted as part of this comprehensive transport assessment in order to ensure that school-related matters are considered.

SINSW also request that transport planning for the draft Proposal be guided by the NSW Governments Movement and Place Framework (MAPF) and its Built Environment Performance Indicators. These indicators are based on qualities that

contribute to a well-designed built environment and should inform the transport infrastructure for the study area.

The MAPF's core 'Amenity and Use' and 'Primary Schools' indicators are of particular importance to SINSW, as these encourage urban designers to consider the impact on adjacent places/uses, as well as emphasising movement that supports place. The 'Primary Schools' indicator provides two specific metrics to judge the effect of infrastructure on the accessibility of public schools in an area; these being walkability and public transport access. These metrics require designers to assess whether proposed infrastructure facilitates access to primary school facilities (or public transport connections to schools) or whether it exacerbates gaps in the existing network.

Effective transport planning for the study area would include the following measures to promote safety, access and pedestrian prioritisation:

- Preparation of an Access and Movement Strategy
- Physical separation between pedestrians, cyclists and heavy vehicles
- Default lower vehicle speeds (e.g. School Streets)
- Access for all ages and abilities, such as ambulant disabilities and prams
- Kerb outstands and refuges crossings (particularly around schools).
- Pedestrian legs on all approaches to intersections.
- Weather-protected bus departure zones
- For local roads: lower vehicle speeds to 15 km/h in High Pedestrian Activity Areas or 40 km/h within School Zones.

The primary school-focused MAPF amenity indicator can be accessed via the link below:

<https://www.movementandplace.nsw.gov.au/place-and-network/built-environment-indicators/primary-schools>

Further to the above, SINSW request that the Precinct utilise a road network design that will allow for efficient and reliable public transport service delivery that can be integrated into the broader transport network for the local government area. This should emphasise bus-capable roads that facilitate access to local schools in the area. Bus servicing along key roads in the Precinct should allow a frequent, all-day service for residents.

The above guidelines are complemented by the above School Site Selection and Development Guidelines, which stipulate appropriate transport and access layouts for school facilities.