



23 March 2017

Reference:
Contact person: Ryan Jameson

Director, Industry and Infrastructure Policy
Department of Planning and Environment
PO Box 39
Sydney NSW 2001

Dear Sir

Submission on draft SEPP (Infrastructure) and draft SEPP (Educational Establishments and Child Care Facilities)

Council appreciates the opportunity to provide comments on the draft amendments to the State Environmental Planning Policy (Infrastructure) 2007 (I-SEPP) and the new draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (E-SEPP).

The I-SEPP is used extensively by Council and other public authorities on a day-to-day basis to provide essential services to the local community. As such, Council supports the streamlining of its provisions to remove unnecessary processes and enable the more efficient provision of services and infrastructure. Council also supports the focus of the reforms on improving the delivery of social infrastructure and the expansion of various approval pathways to include the private sector. This recognises the important role of the private sector in the provision of a growing range of community services and infrastructure.

Council's key concern arising from the draft SEPPs is that the expanded *Development Permitted Without Consent* and *Complying Development* pathways for schools and health services facilities permit development of a scale and impact that is not commensurate with the level of assessment and community consultation undertaken. This coincides with a substantial reduction in the role that Council's would have in the assessment and approval of these developments. Council makes a number of comments and recommendations in respect of these provisions which could provide a more appropriate level of input by Council and better consideration of local planning issues.

More detailed comments and recommendations on key aspects of the draft I-SEPP and E-SEPP from Council's perspective are provided in attachments 1 and 2 to this letter.

Yours faithfully

David Morrison
Manager Strategic and Economic Planning

Attachment 1: SEPP (Infrastructure) review comments

Draft I-SEPP section/clause	Proposal	Council comment/recommendation
<p>Division 10 Health Services Facilities:</p> <ul style="list-style-type: none"> • clause 58C Complying development 	<p>Introduce a new complying development regime which permits health services facilities, buildings used for training/education of professionals, commercial premises, administration buildings, child care centres, car parks within the boundaries of existing health services facilities (for buildings no greater than 12m in height or closer than 5m from the boundary and demolition not exceeding 250sqm)</p>	<p>Council supports a new complying development pathway to allow the private sector to undertake minor developments for health services facilities, however, developments with more than minor potential impacts on local infrastructure and amenity would be possible through the proposed provisions, given:</p> <ul style="list-style-type: none"> • The limited development criteria to be satisfied e.g. new buildings and alts/additions on the site of an existing health services facilities only need to comply with a 12m height limit and 5m boundary setback. There is no limit on the floor area of individual developments or the cumulative amount of such development over time or in terms of maximum site coverage or increase in staff/patient numbers; • The nature of some of the prescribed zones in which health services facilities are permitted e.g. residential zones with sensitive receptors; • The range of impacts that typically arise from the various types of health services facilities e.g. traffic, car parking, noise, overshadowing, water/sewer servicing etc. <p>Council questions whether a 'codified' complying development pathway is appropriate for development of this nature and potential scale and whether it is capable of properly addressing all of the related impacts. Such development is currently subject to a more rigorous development application process, with a merits assessment and public notification/consultation to ensure that the impacts of the development are properly addressed.</p> <p>Council suggests that it would be more appropriate to limit complying development to development of a minor scale and</p>

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		<p>impact (similar to the <i>development without consent</i> provisions under existing clause 58). This is more commensurate with the streamlined level of assessment undertaken under the complying development pathway. Development over and above that specified as minor could be permitted with development consent.</p>
<p>Division 10 Health Services Facilities:</p> <ul style="list-style-type: none"> clause 58 Development permitted without consent 	<p>Allow a public authority to carry out the following development without consent within the boundaries of an existing health services facility:</p> <ul style="list-style-type: none"> alterations or additions to health service facilities restoration or replacement of accommodation or administration facilities demolition of buildings development for the purposes of any buildings that are not more than 12m in height and located no closer than 5m from any property boundary car parks helipads clearing of vegetation and relocation or removal of utility services (on any land where preliminary to, and for the purpose of facilitating, other development for the purpose of a health services facility) 	<p>This is a substantial increase in the range and scale of development permitted without consent compared to the current provisions. Development without consent is currently limited to <i>minor</i> alterations and additions and other developments that don't allow for an increase in staff or patient numbers of more than 10%. In contrast, there appears to be no limit on the scale or nature of some types of development under the new provisions e.g:</p> <ul style="list-style-type: none"> It is unclear whether the 12m height limit and 5m boundary setback specified in clause 58(1)(f) would apply to developments under clause 58(1)(a), (b) and (c) due to the wording of clause 58(1)(f). If not, there appears to be no limit on the potential height, floor area or location of these developments; It is unclear whether development for the replacement of accommodation or administration facilities under clause 58(1)(b) must be the same height, floor area etc. as the original development; there appears to be no limit on the potential height, floor area or location of development for car parks (cl. 58(1)(e)); there appears to be no limit on the potential use of buildings specified under clause 58(1)(f). The clause simply reads "development for the purposes of any buildings...", not "development for the purposes of health services facilities".

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		It is reasonable to expect that the scale and nature of impacts on adjoining properties, local areas and infrastructure resulting from such developments will increase substantially in the absence of clear limits or standards. Provided that public authorities properly consider and address these impacts in their developments under Part 5 of the EP&A Act it should not be an issue, however Council suggests that it would be more appropriate to apply additional criteria on the size, scale and use of developments permitted without consent (particularly those referenced in the points above).
Division 10 Health Services Facilities: <ul style="list-style-type: none"> • clause 57 Development permitted with consent, subclause (2) 	Allow a public authority to carry out with consent an expanded number of developments to service patients or staff or visitors including child care centres, commercial premises, community facilities, information and education facilities, recreation areas and facilities, and residential accommodation, health research industries and buildings or places for training or education of health or other professionals on State land within the boundaries of a health service facility.	Supported.
Division 10 Health Services Facilities: <ul style="list-style-type: none"> • Clause 58A Notification of carrying out of certain development without consent 	Before carrying out certain development without consent, being: <ol style="list-style-type: none"> a) the alteration of, or addition to, a building that is a health services facility; b) development for the purposes of restoring or replacing accommodation or administration facilities; or 	Supported, however Council suggests that the notification requirements should be extended to all categories of development permitted without consent under clause 58(1) and that the words " <i>and adjacent</i> " be inserted into clause 58A(2)(a)(ii) after the word "adjoining". This would extend the notification requirements to developments for the demolition of buildings, helipads and car parks which can also have significant impacts on the surrounding area, and ensure that the occupiers of land adjacent to the development site are

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	<p>c) development for the purposes of any buildings that are not more than 12m in height and located no closer than 5m from any property boundary;</p> <p>the person or public authority which is carrying out this development must notify the council and occupier of any adjoining land and consider any response received within 21 days of the notice being given.</p>	<p>notified in addition to occupiers of adjoining land.</p>
<p>Division 6 Emergency and police services facilities and bush fire hazard reduction:</p> <ul style="list-style-type: none"> • Clause 48 (2AA) 	<p>Allow demolition, restoration, and alterations and additions to existing police and emergency services facilities without consent on any land. Alterations and additions to existing police stations will be limited to development that allows for no more than a 10% increase in staff numbers per year. The NSW Police Force will also need to avoid development at police stations that would result in any significant adverse effect on the amenity of the locality, including impacts on traffic, parking and noise.</p> <p>All police and emergency services facilities that are permitted without consent will continue to require consultation with the relevant council and occupiers of any adjoining or adjacent land</p>	<p>Supported.</p>

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Division 10A Operational land, clauses 58E and 58F	Extend exempt development and development permitted without consent which councils can currently undertake on their public reserves to include council operational lands.	Supported.
Part 2, Division 1: Consultation	Require a "scope of the works" to be provided to those consulted / notified to assist them in understanding how the development will impact on their infrastructure and services.	Supported.
Part 2, Division 4 Exempt development	Clarify when demolition can be undertaken as exempt development, by specifying that exempt development is not to involve demolition of a heritage building.	Supported.
Part 2, Division 5 Complying development: <ul style="list-style-type: none"> Clause 20C General conditions of complying development certificates, subclause (13) Post-works requirements 	Council proposed change: That clauses 20C(13)(a) and (b) be omitted and replaced with: (a) the development involves the erection, enlargement or extension of a building or the placing or relocating of a building within a water supply authority's area of operations, and (b) the water supply authority requires a certificate of compliance to be obtained with respect to the erection enlargement or extension of a building or the placing or relocating of a building or change	Council's proposed change removes some ambiguity in the wording of existing clauses 20C(13)(a) and (b) by clarifying that a certificate of compliance from the water supply authority is required for complying development that involves the enlargement or extension of a building or the placing or relocating of a building within a water supply authority's area of operations. The existing clause 20C(13)(a) and (b) only refers to complying development involving the erection or change of use of a building. Council's proposed wording is consistent with Clause 224(a) of the Water Management (General) Regulation 2011.

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	of use of the building,	
Part 3, Division 4 Electricity generating works or solar energy systems	Transfer exempt and complying provisions for small wind turbine systems and solar energy systems to the SEPP (Exempt and Complying Development Codes) 2008, namely clauses 37, 39(1) and (3).	Supported. It is appropriate for these provisions to be transferred into the SEPP (Exempt and Complying Development Codes) 2008 as they are used primarily by households and private commercial premises.
Part 3, Division 12 Parks and Other Public Reserves	Clarify and add to the existing "development permitted without consent" provisions that may be carried out by a council on a public reserve under the control of or vested in a council. Additional provisions include pedestrian bridges, landscape structures or features (such as art work), food preparation and related facilities, and demolition of buildings no greater than 250sqm.	Supported.
Part 3, Division 12 Parks and Other Public Reserves	Update the "exempt development" provisions and who can access these provisions, and clarify and expand the types of development that can be carried out as "exempt development". These provisions will allow public authorities, Trusts and councils to undertake various day-to-day and other activities which are of minimal environmental impact. Delete the requirement that "exempt development" must be for the purposes of implementing a "plan of	Supported.

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	management". These activities are minor in nature, and are often not specifically referred to in the plan of management.	
Division 17 Roads and traffic: <ul style="list-style-type: none"> Clause 104 Traffic-generating development 	Require public authorities to consult with Roads and Maritime Services prior to undertaking development without consent that meets the thresholds for traffic generating development in Schedule 3.	Supported, however it is suggested that the consultation requirements be extended by: <ul style="list-style-type: none"> Requiring the public authority to also consult with the Council where the traffic-generating development without consent affects local roads; Requiring complying development that meets the traffic generating thresholds to obtain certification from RMS (as is proposed for complying development for schools under the draft Educational Establishments and Child Care Facilities SEPP)
Division 18 Sewerage systems, clause 107(c)(viii)	Omit clause 107 (c) (viii). Insert instead: <i>(viii) maintenance or replacement of sewerage system components other than for the purpose of substantially increasing capacity,</i>	The change in terminology from "pumping station component" to "sewerage system component" is supported, however the current clause wording specified that exempt development included "maintenance, repair, renewal or replacement", while the new draft clause proposes to have the exemption applying only to "maintenance or replacement". It is noted that the proposed definition change in Clause 5(2) indicates "maintenance includes repair", however the removal of the word "renewal" would mean that renewal of sewerage system components which does not involve replacement would not fit the definition of exempt development. <i>Recommendation: The new clause 107(c)(viii) be expanded to indicate "maintenance, renewal or replacement".</i>
Division 24 Water supply systems, clause 127 (b).	Omit clause 127 (b). Insert instead: <i>(b) environmental management works,</i>	The reason given for deleting Clause 127(b) is inconsistent with retaining Clause 107(b).
Division 24 Water supply systems, clause 127(m)	Omit clause 127(m). Insert instead: <i>(m) maintenance or replacement of</i>	The change in terminology from "pump station components" to "water supply systems" is supported, but again a concern

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	<i>components of water supply systems other than for the purpose of substantially increasing capacity,....</i>	is that the current clause specified that exempt development included “maintenance, repair, renewal or replacement”, while the new draft clause is proposing to have the exemption applying only to “maintenance or replacement”. The removal of the word “renewal” would mean that renewal of water supply system components which does not involve replacement would not fit the definition of exempt development. <i>Recommendation: The new clause 127(m) be expanded to indicate “maintenance, renewal or replacement”.</i>
Division 24 Water supply systems, new clause 127(m1)	Insert new clause 127(m1)	The addition of water meters to exempt development is strongly supported.
Division 24 Water supply systems, new clause 127(m2)	Insert new clause 127(l)(m2)	Adding telemetric equipment as exempt development is supported, but the width limit of 300mm is considered too small – suggest it should be at least 1000mm.
Division 24 Water supply systems, new clause 127(n)(iv)	Insert new clause 127(n)(iv)	The addition of slope stability works to exempt development is strongly supported.

Attachment 2: SEPP (Educational Establishments and Child Care Facilities) review comments

Draft E-SEPP section/clause	Proposal	Council comment/recommendation
<p>Division 5 Complying development:</p> <ul style="list-style-type: none"> Clause 18 Development affecting certain trees or vegetation 	<p>Complying development is not required to satisfy the requirements of clause 17(2)(g) (i.e. does not have to obtain any required permit or development consent from Council) in respect of the removal or pruning of a tree or other vegetation if:</p> <p>(a) in the case of any tree, it is not listed on a significant tree register or register of significant trees kept by the council, and</p> <p>(b) the tree or vegetation is within 3 metres of the development, and</p> <p>(c) the tree or vegetation has a height that is less than 8 metres.</p>	<p>Not supported. Residential zones and heritage conservation areas in parts of the Clarence Valley contain significant numbers of trees which make a significant contribution to the vegetated and historical character of towns like Grafton and Maclean. As such, a permit or development consent is required under clause 5.9 and 5.10 of the Clarence Valley LEP 2011 for the removal or pruning of trees in these areas in order to preserve local character and biodiversity values. The partial removal of this protection via Clause 18 is not considered to be entirely justified. It is not considered to be an unreasonable or onerous requirement that complying developments under this SEPP (many of which will take place in residential zones and heritage conservation areas) properly consider the value of trees on the subject land and the impacts of the development on local character. Removing proposed Clause 18 and retaining the existing permit / development consent requirements would prompt applicants to properly consider these issues prior to simply proceeding with the development.</p>
<p>Part 4 Schools—specific development controls:</p> <ul style="list-style-type: none"> Clauses 33(4) and 34(3) 	<p>Complying development for existing schools and school based child care is not required to satisfy the requirements of clause 17(2)(g) (i.e. does not have to obtain any permit or development consent that would ordinarily be required from Council for the removal or pruning of a tree or other vegetation).</p>	<p>Not supported. Clauses 33(4) and 34(3) remove the requirement for complying development under clause 33 and 34 to obtain a permit or development consent for the removal or pruning of any tree or other vegetation on the subject land that would otherwise be required from the council. This is considered to be excessive and proposed primarily for the purpose of 'streamlining' the approval process for these developments without properly considering the potential impacts on local character and biodiversity values. See further comments above.</p>
<p>Division 5 Complying</p>	<p>Council proposed change:</p>	<p>Council's proposed change removes some ambiguity in the</p>

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<p>development, clause 19 General conditions of complying development certificates:</p> <ul style="list-style-type: none"> • Subclause (13) Post-works requirements 	<p>That subclauses 19(13)(a) and (b) be omitted and replaced with:</p> <ul style="list-style-type: none"> (a) the development involves the erection, enlargement or extension of a building or the placing or relocating of a building or change of use of a building within a water supply authority's area of operations, and (b) the water supply authority requires a certificate of compliance to be obtained with respect to the erection enlargement or extension of a building or the placing or relocating of a building or change of use of the building, 	<p>wording of existing subclauses 19(13)(a) and (b) by clarifying that a certificate of compliance from the water supply authority is required for complying development that involves the enlargement or extension of a building or the placing or relocating of a building within a water supply authority's area of operations. The existing subclauses 19(13)(a) and (b) only refer to complying development involving the erection or change of use of a building. Council's proposed wording is consistent with Clause 224(a) of the Water Management (General) Regulation 2011.</p>
<p>Part 1, clause 5 Definitions</p>	<p>The proposed Standard Instrument (LEP) Amendment Order will align National definitions of early childhood education and care services into the NSW planning system by including new and updated definitions covering:</p> <ul style="list-style-type: none"> • <i>early childhood education and care facilities</i> [group term], • <i>centre-based child care</i>, • <i>school-based child care</i>, • <i>home-based child care</i>, and • <i>mobile child care</i> 	<p>Supported.</p>
<p>Part 3 Early childhood education and care facilities—</p>	<p>Introduction of a new Child Care Planning Guideline consolidating the</p>	<p>Supported.</p>

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specific development controls: • Clause 21	planning and design requirements of National & State standards and regulations. To be taken into consideration when assessing development applications for Centre-based child care.	
Part 3 Early childhood education and care facilities—specific development controls: • Clause 20	New concurrence role for the Department of Education to review development applications for Centre-based child care that do not meet key national requirements for unencumbered indoor and outdoor space for children.	Supported.
Part 3 Early childhood education and care facilities—specific development controls: • Clause 23	Non-discretionary development standards for centre-based child care – development applications cannot be refused on the following grounds: • location – the development may be located at any distance from an existing or proposed early childhood and education and care facility; • indoor or outdoor space – if development complies with national/state regulations; • design – if the development satisfies the design criteria in the Child Care Planning Guideline; • site area, site coverage and site dimensions – the development may be located on a site of any size, cover any part	Supported except for clause 23(2)(c) “site area, site coverage and site dimensions”. There is some ambiguity in the wording of this clause, for example, are developments required to comply with boundary setback controls in the applicable development control plan or can they be situated anywhere on a lot? Council recommends that boundary setback controls continue to apply to centre-based child care developments and that clause 23(2)(c) be re-worded to make this clear.

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	<p>of the site, and have any length of street frontage or allotment depth;</p> <ul style="list-style-type: none"> • colour of building materials or shade structures – the development may be of any colour or colour scheme, except where the development is a heritage item or in a heritage conservation area. 	
<p>Part 3 Early childhood education and care facilities—specific development controls:</p> <ul style="list-style-type: none"> • Clause 25-26, 32 and Codes SEPP (home-based child care) 	<p>Permit mobile child care, home-based child care on bushfire prone land, school-based child care (as long as no works are required on the school site) and emergency or temporary relocation of child care facilities as exempt development (subject to meeting the specified criteria).</p>	<p>Supported.</p>
<p>Part 3 Early childhood education and care facilities—specific development controls:</p> <ul style="list-style-type: none"> • 24 Centre-based child care 	<p>The following matters in any Development Control Plan controls will not apply to proposed development for the purpose of centre-based child care:</p> <ul style="list-style-type: none"> • numbers of children • age ratios of children • compliance with the Building Code of Australia; • glazed areas (windows); • operational or management plans or arrangements; • demonstrated need or demand for child care services; 	<p>Supported.</p>

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	<ul style="list-style-type: none"> • proximity of facility to other early childhood education and care facilities; • fencing; • laundry and hygiene facilities; • space requirements—indoor space; • space requirements—outdoor space (including natural environment and shade); • toilet and hygiene facilities; • ventilation and natural light; • administrative space; • nappy change facilities; and • any matter provided for in the Child Care Planning Guideline. <p>The majority of these provisions are matters that are regulated by the National Quality Framework.</p>	
<p>Part 4 Schools — specific development controls:</p> <ul style="list-style-type: none"> • Clause 32 Existing schools — exempt development 	<p>The types of low impact developments that will be permitted as exempt development include:</p> <ul style="list-style-type: none"> • one storey portable classrooms • out of school hours care for primary school aged children provided in existing buildings • Cl 32(1)(b) removal of trees if they pose a risk to safety or damage to infrastructure (as assessed by an appropriately qualified arborist) • landscaping and environmental management works • play equipment, sporting fields and 	<p>Council supports the expansion of exempt development provisions for existing schools however a number of developments proposed under this clause (e.g. sporting fields, courts, workshops, portable classrooms) have the potential to have more than minor impacts on local infrastructure and there is no trigger for the payment of section 94 or section 64 contributions to council. Council suggests that either these types of developments be removed from the exempt development pathway, or that an additional clause be added to clause 15 (General requirements for exempt development) requiring the developer to obtain the written requirements of council for development that is likely to affect local infrastructure.</p>

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	<p>courts</p> <ul style="list-style-type: none"> • routine maintenance works • walking paths, seats, shelters and shade structures • information boards and way finding signage • amenities building • demolition of certain development that is not a heritage item or in a heritage conservation area. 	
<p>Part 4 Schools — specific development controls:</p> <ul style="list-style-type: none"> • Clause 33 Existing schools—complying development 	<p>The types of complying development permitted within the boundaries of an existing school include:</p> <ul style="list-style-type: none"> • construction of buildings for educational uses such as classrooms, a library, administration, school hall, gymnasium, canteen or a child care facility • construction of classrooms, lecture theatres, laboratories, trade or training facilities • construction of gyms, indoor sporting facilities or halls • a car park • demolition of a buildings that have an area no greater than 250 square metres • minor alterations or additions to existing buildings • restoration, replacement or repair of damaged facilities. • The height of new buildings 	<p>Council supports the expansion of complying development provisions for private operators in this area but believes the proposed provisions permit a scale of development that goes far beyond what is appropriate for the level of assessment and community consultation undertaken as part of the complying development pathway. Developments with significant potential impacts on local infrastructure, adjoining properties and surrounding areas would be possible through the proposed provisions, given:</p> <ul style="list-style-type: none"> • The relatively liberal development standards to be satisfied e.g. new buildings and alts/additions on existing buildings can be up to 4 storeys (22m). There is no limit on the floor area of individual developments or the cumulative amount of such development over time or in terms of maximum site coverage or increase in student/staff numbers; • The nature of some of the prescribed zones in which schools are permitted e.g. residential zones with sensitive receptors; • The range of impacts and demands on infrastructure that typically arise from schools and related facilities e.g. traffic, car parking, noise, water/sewer servicing etc.

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	<p>constructed, or existing buildings as a result of alterations and additions, could be up to 4 storeys (22m).</p> <ul style="list-style-type: none"> Schedule 2 contains additional development standards that will be applicable to complying development, including setbacks, building materials, overshadowing, privacy, landscaping, waste management and development on bush fire prone land and flood prone land 	<p>Council questions whether a 'codified' complying development pathway is appropriate for development of this nature and potential scale and whether it is capable of properly addressing all of the related impacts. Such development is currently subject to a more rigorous development application process, with a merits assessment and public notification/consultation to ensure that the impacts of the development are properly addressed.</p> <p>Council suggests that it would be appropriate to include further standards limiting the scale of individual and successive developments carried out via complying development, for example through:</p> <ul style="list-style-type: none"> floor area limits Maximum increase in staff/student numbers of 10% Retain existing 12m building height limit. <p>This is more commensurate with the streamlined level of assessment undertaken under the complying development pathway. Development over and above could be permitted with development consent.</p>
<p>Part 4 Schools — specific development controls:</p> <ul style="list-style-type: none"> Clause 33(5) 	<p>Complying development within the boundaries of an existing school cannot contravene any existing condition of a development consent (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, car parking, vehicular movement, traffic generation, loading, waste management, landscaping or student or staff numbers.</p>	<p>Strongly support the inclusion of this clause.</p>
<p>EP&A Amendment (Schools)</p>	<p>A certifying authority must not issue a</p>	<p>Supported, however this requirement would only apply to 3</p>

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Regulation 2017	complying development certificate unless they have been provided with a written statement by a qualified designer verifying that school buildings that are more than 12 metres in height achieve the design quality principles contained in Schedule 4 of the proposed SEPP.	and 4 storey buildings. Council argues that good quality design and amenity is just as important in school developments below 3 storeys and 12m in height, which accounts for most, if not all, school development in the Clarence Valley. The Department should consider extending this requirement to developments over say 1 storey or more than a certain floor area.
EP&A Amendment (Schools) Regulation 2017	If complying development will result in the school being able to accommodate 50 or more additional students, the application for complying development must be accompanied by a certificate issued by Roads and Maritime Services certifying that any impacts on the surrounding road network as a result of the development are acceptable or will be acceptable if specified requirements are met.	Supported, however Council's should have input into the assessment of the traffic and road impacts of development, particularly where the affected roads are local roads and not RMS controlled roads. Council suggests that RMS be required to consult with council, either directly or through the Traffic Committee (the preferred option), prior to issuing any certificate with respect to traffic impacts.
Part 4 Schools — specific development controls: <ul style="list-style-type: none"> • Clause 30 Schools— development permitted without consent 	Development permitted to be carried out without consent in connection with existing schools includes: <ul style="list-style-type: none"> • one storey buildings for school purposes such as a library, administration, a classroom, a tuckshop, cafeteria or bookshop • a car park that is not more than one storey high, • an outdoor learning or play area and associated awnings or canopies, • minor alterations or additions, such 	Supported.

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	<p>as internal fitouts, or to address occupational health and safety requirements or to provide access for people with a disability,</p> <ul style="list-style-type: none"> • restoration, replacement or repair of damaged facilities, • demolition of buildings or structures <p>Non-government schools will be prescribed as public authorities to enable them to carry out development without consent using the same process currently used by public schools under Part 5 of the EP&A Act.</p>	
<p>Part 4 Schools — specific development controls:</p> <ul style="list-style-type: none"> • Clause 30(2) and (3) 	<p>Development without consent provisions will only permit development that will not allow for an increase in the numbers of student and staff numbers at the existing school that is greater than 10% of the numbers during the previous 12 months and will not require an alteration of transport or traffic arrangements.</p> <p>Development undertaken without consent also cannot contravene any existing condition of a development consent (other than a complying development certificate) that applies to any part of the school, relating to</p>	<p>Strongly supported. It is considered that clause 30 provides for an appropriate level of development without consent by public authorities and private operators.</p>

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	hours of operation, noise, car parking, vehicular movement, traffic generation, loading, waste management, landscaping or student or staff numbers.	