

Submission for Campbelltown Anglican Schools Council

The draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) (SEPP) 2017 and associated planning and design guidelines will have significant benefits for St Peter's Anglican Primary School and Broughton Anglican College being non-government Independent Schools under the governance of Campbelltown Schools Council..

Being situated in Campbelltown City Local Government Area, both St Peters Anglican Primary School and Broughton Anglican College are facing the same pressures of our local Government and Catholic schools with respect to current and future enrolment demands. St Peters Anglican Primary School is situated in very close proximity to Campbelltown City CBD, where the surrounding areas are being transformed from single dwelling housing to high rise residential developments. Broughton Anglican College is situated in the Menangle Park area, presently a rural environment which is earmarked for residential development. Proposed changes to planning and design guidelines contained in the draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) (SEPP) 2017 would allow schools such as ours to meet the changing current and future enrolment demands being placed on all schools in our region.

One of the most significant benefits within the proposed SEPP is the classification of non-government schools as a "*public authority*". If St Peter's Anglican Primary School had previously been classified as a "*public authority*", it would have allowed for more timely, convenient building and alternations to occur to our infrastructure. This would then have allowed for our school to develop, grow and meet the education needs of our students.

Broughton Anglican College is presently planning to undertake a significant building program to replace antiquated buildings which are not conducive to best practice teaching and learning. The building program has also been developed to cater for proposed residential development near the College. Changes of classification of non-government schools to be public authorities as proposed by the draft SEPP would enable schools, such as the College, situated in or near proposed residential expansion the opportunity to play a role in meeting the increased demand for educational services in a more timely and efficient manner.

At present, non-government schools are unable to undertake works under a "Development without Consent" due to "*Clause 20(a) – Exempt development carried out by public authorities*".

In 2015, St Peter's Anglican Primary School had the opportunity to introduce an additional kindergarten classroom by installing a demountable classroom in a timely fashion. However, due to the rigorous and timely process for this to occur, a decision was made not to proceed. This potentially limited growth of our school.

On numerous occasions, there has been a need to make minor alterations to existing building eg changing a window to a door. However, due to the resources required, cost involved and processes through Council, a decision was made not to proceed. However, under the proposed SEPP, these alternations to the external façade can occur as a development without consent.

Over the past year, the School has been exploring options to upgrade existing playground equipment. Under the draft proposal, we will be able to undertake minor developments such upgrading the play equipment, landscaping, amenities building, single storey portable classrooms and sporting facilities as an exempt development. This will certainly make progressing projects a lot easier.

Similarly, Broughton Anglican College has experienced delays in constructing shaded areas and COLAs due to the previous restrictions that required approval for projects which would now be exempt or complying developments under the proposed changes. Under the proposed changes the College would be able to accelerate planning and development for projects, such as car parking spaces, outdoor learning spaces and realignment of our football (soccer) fields. The proposed changes would make it easier for schools to install demountable classrooms to be temporary replacements as we demolish some of our antiquated single classrooms to enable us to clear the space for the construction of a new classroom block.

As the majority of works for St Peter's Anglican Primary School and Broughton Anglican College occurs during school holiday period, the time it takes to submit a Development Application with supporting documentation, engaging external service provider for consultant reports can be lengthy and resource intensive. A delay in the process for approval could also mean that the proposed project is delayed and falls outside of the school holiday period for works to be undertaken.

St Peter's Anglican Primary School and Broughton Anglican College both undertake an extensive tree audit yearly by a qualified Arborist. At present, a Development Applications needs to be submitted for any trees the Arborist identify as a significant risk and need to be removed or trimmed. In accordance with proposed clause 32 – Exempt development of the SEPP, being able to remove or trim a tree that has been assessed by the Arborist that poses a risk of health or safety or of damage to infrastructure will be a benefit, especially if immediate action is required. The safety of our students and visitors is paramount.

With the introduction of the new SEPP, it will allow:-

- Efficient operations of our schools and for staff to focus on core business which is Education.
- The School and the College to master plan infrastructure in line with the strategic plans and visions. It will allow us to also increase our facilities based on enrolment demands.
- Convenient, simpler and faster processes to help the schools to better navigate the complex NSW Planning system.
- Transparency, clarity and treats non-government and government schools equally – fair and consistent.
- Under a “**Development without Consent**”, St Peter's Anglican Primary School and Broughton Anglican College are enthusiastic and eager to be able to carry out the following in line with environment impacts of the development in accordance with Part 5 of the EP&A Act:-
 - All various alternations (*internal fit outs, alterations or additions to address work health and safety requirements or to provide access for people with disability*)
 - Alternations or additions to the external façade of a building that does not increase the building envelope
 - Additions and expansions of school facilities for example, library or an administration building, portable classrooms, permanent classrooms, Kiosk, cafeteria or bookshop, car parking
 - Restoration, replacement and repair of damage facilities
 - Security measures, including fencing, lighting and security camera
 - Removal and trimming of trees that have been identified as a WHS concern.

We are supportive of the proposed SEPP and look forward to still maintaining a positive working relationship with our local Council to ensure open and transparent discussions are held. These discussions will enable the School and the College to meet our educational needs but also provide valuable advice and guidance to ensure our school develops and grows for the benefit of our community.