



Early Childhood Australia
A voice for young children

Early Childhood Australia (NSW Branch) Response on the Draft State Environmental Planning Policy (Educational Establishments and Child care facilities) 2017

About Early Childhood Australia NSW branch:

Early Childhood Australia NSW (ECA) is a volunteer run organisation promoting the voice for young children and supporting professionals working in the field of early childhood education. Our members come from both a wide range of different organisations representing community based, private centres (preschool and long day care), family day care, outside school hours care services, training organisations, private consultants and universities.

Our Response:

ECA welcomes the opportunity to comment on the 'Draft State Environmental Planning Policy Child care Planning Guidelines' and agrees with aligning of the Child Care Planning Guidelines with the requirements of the Education and Care Services National Law and Regulations. The draft guidelines provide a sound basis for planning quality child care centres and streamlining the approval process for the development of new centres.

ECA believes very strongly in providing well planned early education centres to ensure that children and families are supported in safe and stimulating play environments.

ECA supports the State government's commitment to streamlining the approval process to ensure that there will be enough child care places for every child to attend a quality early education environment. The challenge for ECA members is that we believe that the current market driven system will not support the government's child care provision aims.

Under the Draft State Environmental Planning Policy, (Educational Establishments and Child care Facilities) 2017, the non-discretionary development standards relate to preventing a consent authority the ability to impose more onerous standards to a Development application than stated in the Guidelines. Our concerns relate particularly to the standard, 'proximity to other child care centres or schools'.

From a state perspective, there is an urgent demand for child care in particular areas of NSW, however there are many areas of NSW where there is a definite oversupply of centres. The oversupply of places leaves families in a challenging position, where the long term financial viability of the centre comes into question. As utilisation decreases, financial viability reduces. For many centres, maintaining consistently high enrolments is important to ensure that the service remains financially viable. Lower utilisation results in lower staff numbers and therefore lack of continuity of care for children. Children and families require secure and reliable education and care centres.

It is also noted that the Policy's 'Non-Discretionally Development Standards' also restricts the ability for an approving authority to restrict or refuse approvals based on supply/demand imbalances, or cater to other local area specific needs. Local Councils have traditionally held this role of understanding the needs to their local community, and the range of existing child care centres. ECA believes that this aspect of the policy

position needs to be reviewed and amended so that local councils maintain their role in the supply of education and care centres.

For many new child care providers, centres are being set up in areas where higher fees can be charged, so to ensure their financial viability. This also means that providers are not encouraged to provide child care in areas where there is demand, but the social demographics do not support the cost of child care fees. To ensure that all children have access to early childhood education, providers should be encouraged to develop centres in areas of high demand that do support low socioeconomic and vulnerable communities.

Conclusion

ECA supports the aim of the NSW state government to develop design guidelines to support stimulating early education environments for children. ECA would however like to see a planned approach to the development of early childhood centres across NSW so that every child has the opportunity to a quality early childhood environment, and address the issue of oversupply and undersupply of early childhood centres across NSW.