

6 April 2017.

Director, Industry and Infrastructure policy

Department of Planning and Environment

GPO Box 39

Sydney, NSW 2001.

Proposed New Planning Controls for Schools, Universities, TAFE Colleges and Childcare Development in NSW.

Dear Director,

Thank you for this opportunity to submit reflections on the public consultation draft.

The basic aim of the draft SEPP “to facilitate the effective delivery of educational establishments and early childhood education and care facilities across the State.” will be applauded by the vast majority of non-government schools, who are however likely to be disappointed by the extent to which the draft achieves this aim.

From the point of view of a non-planning professional and not having engaged the services of planning professionals for this purpose, Kamaroi School is concerned about the following aspects of the draft:

1. The draft appears to focus on complying developments whilst missing bigger opportunities to meet the basic aim. Underlying the aim is presumably the understanding that school age enrolment growth poses a serious planning issue for the State. The ability of non-government schools to meet their share of the costs associated with accommodating increasing enrolment demands is seriously limited by onerous, costly, time consuming and inconsistent local government approval processes. This school has spent a number of years and significant funds in consultation with the Warringah Council, in preparation for submission of a DA for a new site master plan. We were confident all potentially significant issues were addressed and senior Council management was sufficiently supportive to make an application highly likely to be successful. However, the new amalgamated Northern Beaches Council has taken what appears to be a 180 degree turn of view against planning for school growth, leaving us to seriously consider selling land which was planned to be used for children’s education.
2. The inconsistent application of student and staff number caps applied by local governments as DA conditions could surely be removed as not relevant if a development application meets all environmental planning conditions. Why can’t private certification be available to schools for CDC?

P: 02 9450 1651
F: 02 9450 1109

E: kamaroi@kamaroi.nsw.edu.au

220 Forest Way Belrose NSW 2085
www.kamaroi.nsw.edu.au

3. The mandatory record keeping requirement appears to place an unfair burden on Non-government schools.
4. It is difficult to understand why all new schools should be considered Significant State Developments when clearly few of them would be. Why apply an abnormal interpretation of State Significant Development to new schools? Further, the timeframe of such consents would not enhance efficiencies.
5. There are a number of other planning controls associated with education establishments and perhaps they could all be contained in the new SEPP to help meet the aim.
6. As the current planning complications, uncertainties and inefficiencies applying to schools are already seriously constraining the ability to accommodate a growing school age population it may be worth considering a State government approval authority such as was instituted for the Commonwealth BER funded projects. That scheme enabled highly successful and quality independent school infrastructure projects to proceed with unprecedented speed, which met the economic stimulus aims and could equally meet the looming crisis in school accommodation.
7. It also seems to not meet normal or common interpretations to classify non-government schools as public authorities for the purpose of this draft, and in fact may cause confusion.

I appreciate this opportunity on behalf of Kamaroi school and truly hope the DPE will ensure education stakeholders are satisfied that any changes to planning approval processes will bring greater certainty and efficiency before referring any draft to the Minister for approval.

Kind regards,

John Forman

John Forman

Business Manager and Company Secretary.



P: 02 9450 1651

F: 02 9450 1109

E: kamaroi@kamaroi.nsw.edu.au

220 Forest Way Belrose NSW 2085

www.kamaroi.nsw.edu.au