



19 April 2017

Director, Industry & Infrastructure Policy
Department of Planning & Environment
PO Box 39
SYDNEY NSW 2001

Dear Sir / Madam,

Canterbury–Bankstown Council Submission

I refer to Canterbury–Bankstown Council's letter dated 7 April 2017 in relation to the Draft Education and Child Care SEPP and supporting documents.

Council considered the matter at the Ordinary Meeting of 18 April 2017, and resolved to endorse the attached submission.

The submission identifies key issues that the Department of Planning & Environment should address prior to finalising the Draft SEPP and supporting documents.

If you have any enquiries, please contact Council officer Mauricio Tapia on 9707 9923.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mitchell Noble", with a stylized, flowing script.

Mitchell Noble
Manager Spatial Planning



**Submission to the
Draft Education and
Child Care SEPP and
supporting documents**



Submission to the Draft Education and Child Care SEPP and supporting documents

A review identifies the following key issues that the Department of Planning & Environment should address prior to finalising the Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 and supporting documents:

Issue 1: Council does not support the proposal to mandate child care centres as a permissible land use within Zone IN2 Light Industrial.

The Standard Instrument (Local Environmental Plans) Amendment Order (No 2) 2016 proposes to mandate child care centres as a permissible land use within Zone IN2 Light Industrial. According to the exhibition material, a key driver is the need to provide additional land capacity for child care centres.

Council does not support this proposal for the following reasons:

1. The proposal is inconsistent with the Greater Sydney Commission's Draft District Plans.

The proposal is inconsistent with the Draft District Plans' productivity priority to protect and support industrial employment lands.

According to this priority, the Commission's research reaffirms the value of industrial employment lands to Sydney's productivity. The Commission is therefore taking a precautionary approach to the conversion of industrial employment lands in the absence of a district wide assessment of their value and objectives.

As part of the precautionary approach, the Commission will work with Council to inform the preparation of appropriate planning controls to protect, support and enhance the economic function of industrial employment lands.

The concern with the proposal is it pre-empts this work to be undertaken by the Commission and Council.

If strategic planning is to occur in a coordinated and orderly manner in NSW, Council should first be given the opportunity to complete the district wide assessment of the industrial employment lands in accordance with the Draft District Plans.

2. Industrial employment lands should be used for industrial employment purposes.

A key objective of Zone IN2 Light Industrial under the Standard Instrument Principal Local Environmental Plan is to support and protect industrial land for industrial uses.

This objective is supported by state and local policy documents, which identify the retention of industrial uses as vital to the City of Canterbury–Bankstown's economic success in the South District. The policy documents include the Metropolitan Plan 'A Plan for Growing Sydney', Draft South District Plan, Council's Employment Lands Development Study and Council's Local Area Plans.

The proposal is contrary to the objective to support and protect industrial land for industrial uses.

3. The proposal is inconsistent with the Department of Planning & Environment's approval of Council's Local Environmental Plan, which prohibits child care centres in the industrial zones.

As part of the conversion of Bankstown Local Environmental Plan 2001 to the Standard Instrument Principal Local Environmental Plan, the former Bankstown City Council resolved to prohibit child care centres in the industrial zones.

The prevailing character of the industrial zones is to permit industries that are generally inappropriate in other zones. It is important to ensure these industries do not pose a health or safety risk to children, staff or visitors. Vice versa, it is important to ensure sensitive land uses such as child care centres do not inhibit or restrict the operation of industries.

The Department of Planning & Environment endorsed Council's policy to prohibit child care centres in the industrial zones by approving Council's Standard Instrument Principal Local Environmental Plan in March 2015.

4. The proposal poses a health and safety risk to children, staff and visitors.

The Draft Child Care Planning Guideline (Design Criteria 3A) recommends that child care centres should not locate adjacent to incompatible uses that could negatively impact on child protection and safety, and children's health.

The proposal is inconsistent with the Draft Guideline as the siting of child care centres within Zone IN2 Light Industrial will present an unsafe risk to children, staff and visitors from:

- Contaminated land.
- Proximity to noise sources.

- Proximity to odour (and other air pollutants) sources.
- Proximity to hazardous materials.
- Proximity to intermodal terminals.
- Conflict with heavy (B–double) truck movements.

The proposal is also inconsistent with the Environmental Protection Authority’s recommendation to anticipate, avoid or manage potential noise impacts as early as possible in the planning process (*NSW Industrial Noise Policy*). Resolving noise problems after they occur may not always be possible and is often difficult and costly. The preferred option is to avoid the location of sensitive land uses next to noisy activities. This would help to avoid exposing future children, staff and visitors to excessive noise.

5. The proposal does not acknowledge that Council currently provides sufficient land capacity to meet child care demand.

Council currently permits child care centres in the residential, business and open space zones, which cover most of the City of Canterbury–Bankstown.

Whilst the proposal considers there is a shortage of places, this may be relevant for some areas in Sydney. However, according to Council’s Childrens Services, there are many suburbs in the City of Canterbury–Bankstown with an oversupply of child care places. This indicates there is already sufficient land capacity in the city to meet current and future demand for child care services.

6. The proposal is incompatible with Council’s brothels policy.

As an additional matter, Council’s policy is to restrict brothels (also known as sex services premises) to the industrial zones. The objective is to minimise land use conflicts by avoiding the siting of brothels and places regularly frequented by children (such as child care centres) within the same zone.

The proposal to allow child care centres within Zone IN2 Light Industrial will create land use conflicts and is incompatible with Council’s brothels policy.

Recommended Amendment to the Standard Instrument (Local Environmental Plans) Amendment Order (No 2) 2016:

- Do not mandate child care centres as a permissible land use within Zone IN2 Light Industrial.

Issue 2: Council does not support the proposal to allow existing non-government schools to expand as complying development.

The Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 proposes to allow existing schools to expand as complying development (clause 33 and schedule 2).

The issue with this proposal is the City of Canterbury–Bankstown's population is projected to grow to 2036. The city is seeing an increase in the number of non-government schools. These schools must find available land in established urban areas. The conflict between the development of these schools and the surrounding amenity of established urban areas is evident.

Non-government schools tend to draw from a regional catchment area which means greater reliance on cars. This has led to traffic congestion in streets and increased demand for on-street parking. Insufficient lot sizes to accommodate enrolment numbers have also led to excessive building sizes and lack of play areas.

Council's statutory responsibility is to manage the orderly development of schools, in a way that addresses community expectations and provides students with positive learning environments. The intended outcome is to secure best practice outcomes for students, parents and communities. As part of this responsibility, Council must consider the many planning issues relating to schools if it is to better manage this type of development and address community expectations.

Council therefore does not support the proposal to allow existing non-government schools to expand as complying development for the following reasons:

1. The complying development process enables schools to contravene development consents.

According to the Draft Planning Circular '*Regulating Expansion of Schools*', the Draft SEPP cannot be used to increase the number of staff and students at an existing school beyond the maximum numbers permitted in a development consent.

From experience, Council has found this is not the case and the Draft SEPP does not contain adequate safeguards to prevent the complying development process from contravening development consents.

For example, Council considered a proposal for the construction of a non-government secondary school within Zone R2 Low Density Residential. The two storey school included classrooms, library, administration office and indoor multi-purpose centre with capacity for 310 students. The development assessment process considered matters such as section 79C of the Environmental Planning & Assessment Act 1979 and public submissions.

Council granted development consent, however the applicant did not act upon the consent.

Instead, the applicant commissioned the services of a private certifier who issued a complying development certificate for the construction of a larger three storey school under the SEPP (Infrastructure) 2007.

Whilst the SEPP allows the construction of additional school facilities provided there is an existing school on the site, Council challenged the validity of the certificate on the basis there was no existing school on the site. The Land & Environment Court ruled the certificate to be invalid, however, the Court declined to order the applicant to cease construction work.

At the time of the judgement, large parts of the school were already complete and the building well advanced. Since the Court's decision, the applicant continued building works in line with the now invalid certificate. In other compliance issues, endangered ecological communities of the Cooks River / Castlereagh Ironbark Forest were cleared from the site without consent.

The applicant later submitted a development application to occupy the unauthorised school building, and a modification (s96) application to increase the number of students to 600. Of direct relevance to this matter was the finding of the Court that 'the unlawful building works can be regularised by the school lodging a development application with Council'.

In summary, the complying development process enabled the applicant to contravene the original development consent to construct a three storey school with capacity for 600 students. The Draft SEPP does not contain adequate safeguards to prevent the complying development process from contravening development consents or any caps on student and staff numbers.

2. The complying development process does not require an overall concept or masterplan to identify the guiding principles to the development of schools.

According to the Draft Planning Circular '*Regulating Expansion of Schools*', applicants of school developments should look beyond the immediate student and staff numbers and instead consider the future projected student and staff numbers and the maximum operating capacity of the school site. From experience, Council has found this is not the case.

For example, an existing non-government school purchased a property (1,600m² in site area) within Zone R2 Low Density Residential for expansion purposes. The property contains a dwelling house and is separated from the existing school site by seven privately owned properties.

The school proposed to use the dwelling house as a primary school for 60 children. Council refused the development application on the basis the property is too small and poorly located, and will result in cumulative traffic and parking impacts. The school appealed Council's decision.

Whilst the Land & Environment Court acknowledged the property is small and the proposal is likely to worsen traffic conditions; the Court concluded the traffic situation is no different from most other schools in Sydney and there is no point in applying criteria to this school that are not met elsewhere.

To consider the incremental expansion of schools in this way (i.e. without an overall concept or masterplan) does not apply best practice or result in the orderly development of schools.

It would mean school developments do not need to anticipate any expected future expansion of the school, including catering for the future needs that may affect student and staff numbers, car parking, vehicular movement and traffic generation. It would also make it difficult to determine the cumulative impacts of school developments, and the types of infrastructure improvements that may be required to the surrounding road network as a result of the ultimate development.

The preferred approach is to allow existing non-government schools to expand (i.e. new buildings and classrooms) subject to development consent, and for the Draft SEPP to require an overall concept or masterplan as a matter for consideration. The overall concept or masterplan will help explain the development capacity by showing the relationship of schools to the surrounding area. This approach to good design ensures schools respond and contribute to the local context.

From experience, Council has found masterplans to be a useful tool to coordinate the expansion of schools over a long period of time.

3. The complying development process does not consider planning issues that are important to local communities.

The complying development process does not differentiate between government and non-government schools. Non-government schools tend to have larger student numbers, combine primary and secondary schools on the same site, and are significant car trip generators.

From experience, neighbour objections to the expansion of non-government schools relate mostly to:

- Location, size, building and streetscape character, amenity and noise.
- Traffic, on-street parking, set-down and pick-up areas, access and safety. This includes excessive traffic in narrow streets, illegal parking by school users, blocking of residential driveways, unsafe conditions

when schools locate the student set–down and pick–up areas on the street, and poor traffic management during special events.

The concern with the complying development process is it does not address these planning issues, which are important to the community.

It is unlikely the proposed requirement for the Roads & Maritime Services to issue a certificate will provide an adequate safeguard to ensure the complying development process delivers better design outcomes (compared to the development assessment process) when assessing issues such as traffic management, parking, and set–down and pick–up areas on local roads.

As a result, it is impractical to allow non–government schools to expand as complying development, particularly in the suburban neighbourhoods.

4. Private certifiers are not qualified to assess the merits of schools to ensure it meets community expectations, particularly in the suburban neighbourhoods of the City of Canterbury–Bankstown.

It is important to assess schools within the local context of the suburban neighbourhoods, and to ensure schools deliver better design outcomes that respond appropriately to the character of the area, landscaped setting and surrounding built form.

Whilst some of the assessment may be in the form of numerical requirements, experience has shown a large part of the assessment is based on a merit assessment, particularly when responding to community concerns. This requires the skill of qualified practitioners such as architects and town planners.

Based on the above, the proposed requirement for a written statement by a qualified designer will not provide an adequate safeguard to ensure the complying development process delivers better design outcomes (compared to the development assessment process) when assessing merit issues such as building design and amenity.

To address this issue, Council’s preferred option is to allow existing non–government schools to expand (i.e. new buildings and classrooms) subject to development consent.

As the consent authority for development applications, Council’s LEP and DCP contain development controls that enable schools to respond to the essential elements that make up the character of the suburban neighbourhoods. The development controls include objectives, building envelopes, traffic assessment, bus bays, car parks, set–down and pick–up areas, acoustic privacy, safety and security, amenity, free play areas, open space, management plans, social impact and other design issues.

The development application process also enables Council to consider the impact schools may have on the prescribed airspace, particularly for schools in the vicinity of Bankstown Airport. This process requires referrals to the Commonwealth Government and the airport operator.

Recommended Amendment to the Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017:

- Allow existing non–government schools to expand (i.e. new buildings and classrooms) subject to development consent.

Issue 3: Council does not support site compatibility certificates.

The Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 proposes to use site compatibility certificates to facilitate the disposal of surplus educational sites. The site compatibility certificates would permit school sites to adopt the zoning of adjoining land.

Council does not support this proposal for the following reasons:

1. The proposal is inconsistent with state environmental planning policies.

For example if the school site is within a special use zone, SEPP 55 (Remediation of Land) requires an investigation to determine whether the school site is contaminated. However, the proposal does not identify SEPP 55 as a matter for consideration.

2. The proposal does not provide the community with the opportunity to comment in the same way as planning proposals under the Gateway process.

At present, the Department of Planning & Environment does not need to undertake any community consultation when considering requests for site compatibility certificates.

The issue is the proposal has the potential to introduce development which may not be supported by the community, in the same way as the former Part 3A of the Environmental Planning & Assessment Act 1979.

The proposal is also inconsistent with the intended outcomes of the Draft Environmental Planning & Assessment Amendment Bill 2017. The intended outcomes are to enhance community consultation in the NSW planning system, to make planning decisions in an open and transparent way, and to ensure proposals consider the public interest.

Recommended Amendment to the Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017:

- Where spot rezoning proposals seek to facilitate the disposal of surplus educational sites, these proposals must follow the Gateway process.

Issue 4: Other Recommended Amendments to the Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.

Issues	Recommended Amendments
Child care centres	
<p>Clause 23–Child care centres</p> <p>This draft clause prevents Council from refusing a development application on the basis of site area, site coverage or site dimensions.</p> <p>The issue is Council currently applies a minimum site width to ensure sites are of sufficient size to provide for buildings, parking spaces, driveways, vehicle manoeuvring areas, pedestrian access, open space, landscaping and the like. This is in response to child care centres on narrow sites, which find it difficult to provide for the above elements.</p>	<p>Delete the reference to ‘site dimensions’ from clause 23.</p>
<p>Clause 24–Development control plans</p> <p>This draft clause prevents Council from applying open space requirements.</p> <p>According to Council’s Childrens Services, recent proposals in the suburban neighbourhoods do not provide natural outdoor environments. There is national and international research that highlights children need to explore and learn from nature for their emotional, social, cognitive and physical well-being and development. Children can spend up to 11 hours a day in care and this can be detrimental if they are indoors all day.</p> <p>The issue is the Draft Child Care Planning Guideline (which supports the Draft SEPP) states the provision of natural outdoor environments is optional, and may be replaced by indoor spaces that simulate an outdoor environment.</p>	<p>Amend the Draft Child Care Planning Guideline by making it mandatory for child care centres in the suburban neighbourhoods to provide natural outdoor environments.</p>
<p>Clause 24–Development control plans</p> <p>This draft clause prevents Council from requiring operational or management plans.</p> <p>The issue is Council currently requires development applications to submit management plans. From experience, management plans ensure the good long term operation and management of child care centres. This helps to ensure development continues to harmoniously co-exist with the surrounding residential amenity.</p>	<p>Delete the reference to ‘operational and management plans’ from clause 24.</p>

Schools	
<p>Clauses 17 & 32–Development affecting certain trees or vegetation.</p> <p>These draft clauses propose to allow the removal of trees as exempt development if the trees pose a risk to safety or damage to infrastructure.</p> <p>The issue is school sites contain significant tree cover, which contribute to the green grid. The proposal may therefore conflict with the Draft District Plans and the proposed Vegetation SEPP, which seek to enhance tree cover within the green grid.</p> <p>Whilst the removal of trees requires an assessment by an appropriately qualified arborist, it is unclear whether there is the opportunity to conduct a peer review of this assessment.</p>	<p>Review clauses 17 & 32 to ensure consistency with the proposed Vegetation SEPP.</p>

Planning Matters - 18 April 2017

ITEM 5.2 Submission to the Draft Education and Child Care SEPP

AUTHOR Planning

ISSUE

This report outlines Council's submission to the Draft Education and Child Care SEPP and supporting documents.

RECOMMENDATION

That Council endorse the submission to the Draft Education and Child Care SEPP and supporting documents as outlined in this report.

BACKGROUND

In February 2017, the Department of Planning & Environment commenced the exhibition of the Draft Education and Child Care SEPP and supporting documents. The intended outcome is to make it easier for child care providers, schools, TAFEs and universities to build new facilities and improve existing facilities.

The draft documents on exhibition include:

- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017: The intended outcomes of the Draft SEPP are to implement the National Quality Framework for Early Childhood Education and Care Facilities into the NSW planning system; to transfer the planning provisions for schools and tertiary institutions from the Infrastructure SEPP; and to broaden the range of development that can be undertaken as exempt and complying development.
- Environmental Planning and Assessment Amendment (Schools) Regulation 2017: The intended outcomes of the proposed amendments to the Environmental Planning and Assessment Regulation 2000 are to prescribe non-government schools as public authorities; to require the RMS to assess the traffic impacts of complying schools development prior to the lodgement of an application for a complying development certificate; and to require complying schools development proposals to be verified by designers before a complying development certificate can be issued.

- Child Care Planning Guideline: The Draft Guideline contains matters to be considered by consent authorities when assessing development applications for child care centres under the Draft SEPP. It also sets out design criteria. If a development application for a child care centre satisfies the design criteria, a consent authority cannot refuse consent on the basis of design.
- Better Schools Design Guideline: The Draft Guideline contains design quality principles to be considered by consent authorities when assessing development applications for schools under the Draft SEPP.
- NSW Code of Practice for Part 5 Activities: The Draft Code will apply to non-government schools when assessing and carrying out development without consent under clause 31 of the Draft SEPP.
- Planning Circular to Regulate the Expansion of Schools: The Department of Planning & Environment recommends that consent authorities apply certain principles when considering whether it is necessary to place a condition on a consent that will impose a numerical limit on student and staff numbers at the school site. For state significant development applications, the Department will apply these principles before making recommendations to the Minister on the determination (and subsequent conditioning) of the applications.
- Standard Instrument (Local Environmental Plans) Amendment Order (No 2) 2016: The intended outcome is to mandate child care centres as a permissible land use within Zone IN2 Light Industrial and Zone R2 Low Density Residential.

REPORT

Following a review, Council raises the following key issues that the Department of Planning & Environment should address prior to finalising the Draft Education and Child Care SEPP and supporting documents:

1. Council does not support the proposal to mandate child care centres as a permissible land use within Zone IN2 Light Industrial.

The Standard Instrument (Local Environmental Plans) Amendment Order (No 2) 2016 proposes to mandate child care centres as a permissible land use within Zone IN2 Light Industrial.

Council does not support this proposal as it is inconsistent with the Greater Sydney Commission's Draft District Plans, in particular the priority to protect and support industrial employment lands.

The Commission is taking a precautionary approach to the conversion of industrial employment lands in the absence of a district wide assessment of their value and objectives. As part of the precautionary approach, the Commission will work with Council to prepare appropriate planning controls to protect, support and enhance the economic function of industrial employment lands. The concern with the proposal is it pre-empted this work to be undertaken by the Commission and Council.

If strategic planning is to occur in a coordinated and orderly manner in NSW, Council should first be given the opportunity to complete the district wide assessment of the industrial employment lands in accordance with the Draft District Plans.

The proposal is also inconsistent with Council's policy to prohibit child care centres in the industrial zones. It is important to ensure industries do not pose a health or safety risk to children, staff or visitors. Vice versa, it is important to ensure sensitive land uses such as child care centres do not inhibit or restrict the operation of industries.

The Department of Planning & Environment endorsed Council's policy to prohibit child care centres in the industrial zones by approving the former Bankstown City Council's Standard Instrument Principal Local Environmental Plan in March 2015.

Based on the above, it is recommended not to mandate child care centres as a permissible land use within Zone IN2 Light Industrial.

2. Council does not support the proposal to allow existing non-government schools to expand as complying development.

The Draft Education and Child Care SEPP proposes to allow existing schools to expand as complying development.

The issue with this proposal is the City of Canterbury-Bankstown's population is projected to grow to 2036. The city is seeing an increase in the number of non-government schools. Non-government schools tend to draw from a regional catchment area which means greater reliance on cars. This has led to traffic congestion in streets and increased demand for on-street parking. Insufficient lot sizes to accommodate enrolment numbers have also led to excessive building sizes and lack of play areas.

Council's statutory responsibility is to manage the orderly development of schools, in a way that addresses community expectations and provides students with positive learning environments. The intended outcome is to secure best practice outcomes for students, parents and communities. As part of this responsibility, Council must consider the many planning issues relating to schools if it is to better manage this type of development and address community expectations.

Council therefore does not support the proposal to allow existing non-government schools to expand as complying development for the following reasons:

- The complying development process enables schools to contravene development consents.
- The complying development process does not require an overall concept or masterplan to identify the guiding principles to the development of schools.
- The complying development process does not consider planning issues that are important to local communities.

- Private certifiers are not qualified to assess the merits of schools to ensure it meets community expectations, particularly in the suburban neighbourhoods of the City of Canterbury–Bankstown.

Based on the above, it is recommended to allow existing non-government schools to expand (i.e. new buildings and classrooms) subject to development consent.

3. Council does not support site compatibility certificates.

The Draft Education and Child Care SEPP proposes to use site compatibility certificates to facilitate the disposal of surplus educational sites. The site compatibility certificates would permit school sites to adopt the zoning of adjoining land.

Council does not support this proposal as it is inconsistent with state environmental planning policies, and it does not provide the community with the opportunity to comment in the same way as spot rezoning proposals under the Gateway process.

Based on the above, it is recommended that where spot rezoning proposals seek to facilitate the disposal of surplus educational sites, these proposals must follow the Gateway process.

4. Other recommended amendments to the Draft Education and Child Care SEPP.

Other recommended amendments include:

Proposal	Recommended Amendment
Child Care Centres: The Draft SEPP proposes a clause which would prevent Council from refusing a development application on the basis of site area, site coverage or site dimensions.	Allow Council to continue to apply a minimum lot width requirement for child care centres. Reason: The minimum lot width requirement ensure sites are of sufficient size to provide for buildings, parking spaces, driveways, vehicle manoeuvring areas, pedestrian access, open space, landscaping and the like.
Child Care Centres: The Draft SEPP proposes a clause which would prevent Council from applying open space requirements.	Allow Council to require child care centres in the suburban neighbourhoods to provide natural outdoor environments. Reason: According to Council's Children Services, recent proposals in the suburban neighbourhoods do not provide natural outdoor environments. There is national and international research that highlights children need to explore and learn from natural outdoor environments for their emotional, social, cognitive and physical well-being and development.

Proposal	Recommended Amendment
Child Care Centres: The Draft SEPP proposes a clause which would prevent Council from requiring operational or management plans.	Allow Council to continue to request management plans. Reason: From experience, management plans ensure the good long term operation and management of child care centres. This helps to ensure development continues to harmoniously co-exist with the surrounding residential amenity.
Schools: The Draft SEPP proposes to allow the removal of trees as exempt development if the trees pose a risk to safety or damage to infrastructure.	Review this proposal to ensure consistency with the proposed Vegetation SEPP. Reason: School sites contain significant tree cover, which contribute to the green grid. The proposal may conflict with the Draft District Plans and the proposed Vegetation SEPP, which seek to enhance tree cover within the green grid.

Attachment A outlines Council's submission to the Draft Education and Child Care SEPP and supporting documents in more detail.

POLICY IMPACT

This matter has policy implications as the Draft Education and Child Care SEPP will prevail over Council's LEP and DCP in the assessment of development applications for schools and child care centres. It will also broaden the range of development that can be undertaken as exempt and complying development.

FINANCIAL IMPACT OF RECOMMENDATIONS

This matter has no financial implications for Council.

RECOMMENDATION

That Council endorse the submission to the Draft Education and Child Care SEPP and supporting documents as outlined in this report.

ATTACHMENTS

- A. Submission to the Draft Education and Child Care SEPP and supporting documents