

Northern Beaches Greens
Submission on the NSW Government
Draft Education and Child Care SEPP

April 7, 2017

“Schools that are developed in a collaborative partnership create better communities and more engaged students.” From Better Schools - A Design Guide for Schools in NSW, draft for comment.

Introduction

Northern Beaches Greens would like to thank the NSW Department of Planning and Environment for this opportunity to comment on its Draft Education and Child Care SEPP. We welcome the draft’s visionary design principles for childcare and schools and its focus on integrating them into local communities. However, removing local planning approvals for large educational facilities would undermine the important partnership between schools and their communities and local democracy. Furthermore, to ensure the commendable design principles are actually followed by schools, architects and builders, the design guidance should include explicit requirements for issues such as sustainability as well as indoor and outdoor space to student ratios in schools.

Planning Process Should Not Override Democracy

The Draft Education and Child Care SEPP documents highlight the importance of community input to the design process and the importance of community support to educational facilities and student engagement. However, the draft also explains that the pressures of population growth, greater uptake of education services and ageing infrastructure are creating pressure on existing facilities. The proposed SEPP therefore is designed to relieve these pressures by “broadening the range of development that can be undertaken as exempt development and complying development”.

However, this streamlining of planning approvals, obviating the need for development applications to local councils, is likely to undermine that supportive partnership between educational institutions and their surrounding communities. We welcome the proposed community collaboration from the earliest stages of planning. We also note that the Better Schools document advises time is needed to achieve good design through school and community collaboration. However,

removing local planning control undermines the process by allowing decisions to be made undemocratically and by people who are unfamiliar with local conditions.

The right of residents to object to nearby developments of new childcare centres, schools, TAFEs or universities (or of additional facilities) whether four or one storeys high and overshadowing their home for a large part of the day, is **undemocratic**. This is true for both public and private facilities.

Similarly, in cases of State Significant Development, imposing educational facilities on residents without the approval of the local council – which will be in the best position to judge the appropriateness of the development for local communities rather than the Planning Minister or their Representative - is a **democratic abuse**.

Preschools

Northern Beaches Greens applaud the effort to make regulations governing child care centres consistent and straightforward. We also welcome the thoughtful design criteria and consideration of sustainable criteria. However, we believe some of these should be mandated with minimum standards. We have special concerns regarding exposure of children and staff to pollution at centres located in light industrial areas. **We believe pollution of land, air, noise and nearby waterways should be monitored before development with specified maximum safety levels that automatically override development if reached. Ongoing monitoring should also be carried out** once a childcare centre is open – and permission to operate withdrawn if dangerous levels occur.

Given the importance of exposure to the natural environment for child development, we also believe mandatory standards should exist for outdoor “natural play” areas.

Schools

Northern Beaches Greens appreciate the Design Quality Principles and Design Guidance included in the SEPP documents but again believe mandatory standards should be included for some issues. In Design Guidance, on the issue “Sustainable, efficient and durable”, mandatory minimum standards should be set to achieve the highest possible level of sustainable design. These should include: appropriate materials, with an emphasis on thermal mass, recycling, and reduction of energy costs; energy generation; measures to reduce heat sinks (eg pale-coloured roofs and paving, tree planting); water recycling, installation of rainwater tanks, water efficient fittings; energy efficient lighting and appliances; and finally preservation of biodiversity and natural habitats on school grounds.

Implementing these standards will reduce operational costs at schools, help protect the environment from dangerous climate change, send a strong educational message to students and help build student and community pride in schools.

Generous Playgrounds in High Schools

Northern Beaches Greens believe mandatory ratios should be set for student to indoor and outdoor space at schools - as well as childcare centres. Playgrounds are in fact important educational facilities. **Teenagers need sports fields and other outdoor spaces to encourage physical activity amongst both girls and boys – as well as space to relax, especially given the increasing length of school days and pressures at school.** (High schools on the Northern Beaches timetable classes from 8am to 6pm – and some activities start earlier and finish later than this).

We reject the drift in NSW to US-style high rise schools with small playgrounds, with some already under development. Playgrounds should not become a luxury, the preserve only of private schools. New high rise schools planned in densely populated areas such as inner Sydney and Parramatta are in even greater need of large playgrounds because of the limited space students have in these districts outside school for sport. These playgrounds could then be used by the wider community outside school times.

Finally, schools already at capacity and on relatively small blocks of land – such as Mosman High on Sydney's lower north shore and Freshwater High on its northern beaches – should not be turned into multi-storey facilities with limited access to open space for sport and recreation. Schools are among the most important institutions in our society and one of the few remaining centres of community so we believe it is imperative that as a community we find enough land for playgrounds.

Overshadowing

No educational facility should be in a residential area if it will overshadow single storey dwellings, or is a height or bulk out of character with surrounding homes or commercial premises.

Public Transport, Cycle and Pedestrian Access

All educational facilities should provide onsite parking for teachers and other staff – who often travel long distances to work - and be located near good public transport. To encourage walking and cycling amongst students and families, they should have good pedestrian access and bike paths nearby.

In suburbs with narrow, quiet streets, centres are unlikely to attract local support, if the extra burden of traffic blocks roads.

Conclusion

Northern Beaches Greens would like to emphasise our objection to the removal of democratic powers from our local councils inherent in this proposed SEPP for Education and Childcare. Local councils are best placed to represent residents in decision-making concerning developments in their local area. This includes for educational facilities – although we don't discount other planning authorities or state government having input both during initial planning and once a facility has been approved by a council. Residents should always have the opportunity to oppose design flaws such as overshadowing for large parts of the day – which should not be permitted in educational developments.

We also believe the **highest possible sustainable design standards** should be mandated for all educational facilities. For childcare, **natural outdoor play areas** should also be compulsory, and **in schools, large playgrounds** to encourage healthy levels of activity and allow space for relaxation.

Finally, all childcare centres, schools, TAFEs and universities should be developed near **good public transport, provide staff parking, and have good pedestrian and cycle access** to encourage independent and active travel to schools in particular.

In these ways, schools and childcare centres, developed in collaboration with their community, are in turn likely to be strongly supported by that community – leading to a sense of belonging and commitment amongst staff and students.

Finally, Northern Beaches Greens would like to acknowledge use of Australian Greens and NSW Greens planning platforms on sustainable design and the help of teachers who belong to our group in writing this submission.

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