



Trinity Grammar School

**P.O. Box 174
Summer Hill
NSW 2130 Australia**

5 April 2017

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

**ABN 79 245 605 610
CRICOS Code: 02308G**

Dear Sir/Madam

Re: Submission to Public Consultation Draft SEPP (Educational Establishments and Child Care Facilities) 2017 (the draft SEPP)

Trinity Grammar School is the largest Anglican Boys' day and boarding School in NSW with an enviable reputation and tradition for serving the educational needs of boys and young men over a number of generations. The School has campuses located in Strathfield (Preparatory School), Summer Hill (Senior, Middle and Junior School) and a Field Studies Centre at Woollamia. Since its founding in 1913, Trinity has forged a reputation for outstanding academic results, a caring pastoral programme and an emphasis on both traditional and community sports. Trinity has an enrolment of some 2000 boys.

The School is supportive of the efforts of your Department in recognising the growing demand across all sectors of education, including early learning child care systems, and proposal to introduce improvements to the planning framework governing developments undertaken in these sectors.

Being a School that has been continually improving its facilities and implementing its master plan on all 3 campuses, we welcome a simplified planning instrument that will make it easier for improvements and expansions to be made.

Our comments on the draft SEPP are as follows:-

Division 5 – Complying Development

Clause 17(2)(a) – Heritage Implications

Not allowing complying development on multi-hectare school sites that contain a building or buildings of environmental heritage, severely restricts the ability of such Schools to develop areas of their sites not in proximity to the item(s) of environmental heritage. Provided the impact on the heritage item(s) is minimal and any applicable heritage conservation management plan is followed, complying development should be allowed on the School site.

SENIOR SCHOOL MIDDLE SCHOOL

119 Prospect Road
Summer Hill NSW 2130
Telephone 02 9581 6000
International 612+9581 6000
Facsimile 02 9799 9449

JUNIOR SCHOOL

119 Prospect Road
Summer Hill NSW 2130
Telephone 02 9581 6144
International 612+9581 6144
Facsimile 02 9581 6166

PREPARATORY SCHOOL

115-125 The Boulevard
Strathfield NSW 2135
Telephone 02 8732 4600
International 612+8732 4600
Facsimile 02 9742 5419

FIELD STUDIES CENTRE

335 Woollamia Road
Woollamia NSW 2540
Telephone 02 9581 6000
International 612+9581 6000
Facsimile 02 9799 9449

Part 4 – Schools- Specific Development Controls

Clause 28 – Development for the Purpose of Student Accommodation

Given the direct relationship between the provision of student boarding accommodation and the School, this clause should be removed, otherwise Schools will be subject to zoning prohibitions where the zoning prohibits boarding houses and be subject to local Council DCP's designed to control traditional boarding houses. Traditional boarding houses are a very different activity to school boarding houses.

Clause 32(1)(j)

Where the property boundary adjoins a roadway, the requirement for a 5 metre setback is excessive.

Clause 33(1)(ix)

These works should be exempt development and part of Schedule 1.

Clause 33(2)(6)

It is restrictive to not allow underground development as complying development and removes the flexibility that has been available to Schools for most of the last decade.

Clause 51 - Traffic Generating Development

As this clause reads, a development that does not increase the School's population, but provides new or enlarged facilities that cater for more than 50 students, requires written notice of the application to the RMS. This should not be a requirement where there is no increase in overall student numbers as a result of the development.

Schedule 2 – Schools-Complying Development

Clause 2 – Building Height

If a building height is able to be 22 metres from ground level (mean), given the setback controls set out in Schedule 2 Clause 3, the limitation to maximum 4 storeys is restrictive when a building of this height could easily accommodate 6 storeys. Existing school sites have a limited footprint on which building development can occur, so why limit the number of storeys that a building can accommodate?

Schedule 5 - Amendment of Environmental Planning Instruments

Section 5.2 – State Environmental Planning Policy (State and Regional Development) 2011

Clause 15(2)

Given the cost of building works associated with the size and specialist nature of certain types of School facilities, (e.g. science laboratories, multi-purpose halls) the value of \$20M is too low to trigger the development as being a *State Significant Development* and it should be higher. There also needs to be an indexation mechanism to enable this value to grow over time, in line with development cost increases.

General Comment

CDC Certification by Council Officers only

The introduction of CDC's was established to overcome the lengthy process of Council assessment and to introduce certainty of decision under specific guidelines. Having Councils as the sole certifier for complying developments is a backwards step and will delay the delivery of school facilities.

Caps on Development Consents

The planning circular outlining the principles of applying flexibility and evidence when determining caps on student and staff numbers, is a positive move in helping to resolve the conflict between residents and schools in regards to school expansion, and caters for fluctuations that occur due to demographics and parental choice. A fast and efficient method of increasing student numbers is required; one that acknowledges that morning and afternoon peaks occur at the same time each day and for no more than 200 days per year.

Thank you for the opportunity to comment on the draft SEPP.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Craig Sandwell', written in a cursive style.

Craig Sandwell
Acting Deputy Head Master