



LOYAL HENRY COMMUNITY ASSOCIATION

Submission on the Draft Education and Childcare SEPP

6 April 2017

About us

A group of concerned local Ku-ring-gai residents formed the LHCA as a New South Wales incorporated association in 2016 to further and represent the interests of residents in local and community affairs. We have over 100 financial members and a mailing list of over 250.

Our main activity to date has been to oppose the demolition of a Federation style cottage in Lindfield in order to erect a commercial factory style building for a child-care centre. Our opposition to this proposed development, supported by the Ku-ring-gai Council, is based on lack of need and an inappropriate design in an inappropriate location.

Our members engage in other projects of local and community interest from time to time, including the need to re-evaluate the criteria for child-care centres in Ku-ring-gai in particular and the NSW North Shore in general.

The experience of our members with child-care centres and applications, being all too numerous and speculative, have prompted us to oppose a State government takeover of child-care centres on the basis of a one size fits all approach and a philosophy of encouraging new centres – regardless of need, suitability and the interests of the local community.

Oversupply of Child-Care Centres in Ku-ring-gai

We have reason to believe that there is an oversupply of child-care centres in our municipality. We attach a spreadsheet recently prepared by one of our members indicating the existence of 1879 child-care places and a further 686 subject to DA approval.

The following is an extract from a submission by our council to the State Government confirming the oversupply in our municipality, except in relation to the 3-5 year age group.

" A Children's Services Needs study undertaken by Council in 2016 identified that Ku-ring-gai LGA is well supplied with child care places for children aged 3-5 years, as well as for out of school hours care. This was identified as being the status up to 2025. Several larger centres are currently in the process of development, including a 190 place and 200 place child care centre, further underpinning

the supply of child care spaces within the LGA. However, there is an emerging need over the next decade in the 0-3 year age."

Because of this oversupply and for other reasons detailed hereunder, we strongly oppose proposed clauses 23 (2) (a) and 24 (1) (d) of the draft Act to the effect that any new child-care centre "may be located at any distance from an existing or proposed early childhood education and care facility". For the same reasons we also oppose proposed clause 24 (1) (c) to the effect that a consent authority cannot take into account "demonstrated need or demand for child care services". Carried to an extreme, these provisions could permit a whole street of child-care centres side-by-side – regardless of need, demand, streetscape, local amenity or the requirements of local residents.

Child-Care Centres in R2 zones

We strongly oppose any commercial or non-residential activities in R2 low density residential zones. The zone should be restricted to low density residences only. To the extent that they are permitted in the zones, subject to consent, we believe that each local government area should be entitled to retain full planning authority – so as to take into account the local streetscape, landscape and needs of local residents. This is our only major relevant disagreement with the Ku-ring-gai Council submission, which we otherwise support.

Retention of Local Government Planning Controls

We note the Ku-ring-gai submission of support for child-care centres in R 2 zones "on the condition that there are sufficient supporting planning and design controls in place to protect the local amenity and visual character of residential neighbourhoods". While, as above, we would prefer that child-care centres not be permitted in R 2 zones, even with consent, if this is not achievable we are prepared to support the retention of local government planning instruments to protect the rights and needs of local residents. To the extent that the proposed SEPP seeks to take away from local government the right to impose their own planning instruments and controls, we oppose the SEPP in principle as well as in detail – see below.

The Ku-ring-gai Council has submitted that "In cases like Ku-ring-gai, where Council DCP's are deemed to be compliant with the NQF, and there is adequate provision of child-care places, these councils should be granted an exemption from the application of the SEPP and/or the Child-Care Planning Guidelines".

We go further and oppose the application of the SEPP to the Ku-ring-gai local government area and all other areas with a similar controls and planning instruments. Only in this way will the community have a say on childcare centre applications which do not preserve the local amenity and are inconsistent with the legitimate interests of local residents.

Specific Objections

For the above reasons, we are opposed to the following specific provisions of the proposed SEPP, which would prevent important local planning controls being taken into account in relation to: –

- 1) distance from any other child-care facility (23 (2) (a))
- 2) site area, coverage or dimension (23 (2) (c))
- 3) colour (23 (2) (d))
- 4) need (24 (1) (c)) and
- 5) proximity to any other child-care facility (24 (1) (d))

We also support and endorse all other provisions of the Ku-ring-gai Council submission, except its continued support for child-care centres in R 2 zones (as discussed above).

We will be happy to elaborate or amplify on these submissions if so required.

For and on behalf of The Loyal Henry Community Association Inc

Rebecca Cuschieri (President) and David Castle (Vice-President)

KU-RING-GAI - CHILD CARE CENTRES			
Centre	Location	Suburb	No Places
A Bright Beginning Child Care Centre	2 Addison Ave, Roseville	Roseville	24
Acre Woods Childcare Roseville	Cnr Archbold and 81 Clanville Rds, Roseville.	Roseville	90
Beaumont Road Child Care Centre	17 Beaumont Rd, Killara	Killara	80
Camp Australia - Holly Family Primary School	2 - 4 Highfield Rd, Lindfield	Lindfield	60
Camp Australia - Newington Lindfield	26 Northcote Rd, Lindfield	Lindfield	30
Camp Australia - Roseville College	27 Bancroft Ave, Roseville	Roseville	34
East Lindfield Community Pre School	110 Tryon Rd, East Lindfield	East Lindfield	56
Goodstart Early Learning West Pymble	Yanko Road. 3 Boundaries.	West Pymble	34
Gordon Community Pre School	2A Park Ave, Gordon	Gordon	74
HeadStart Early Learning Centre Roseville	Unit 51/28 Barcoo Street, Roseville	Roseville	100
Highfields	18 Highfields Rd, Lindfield	Lindfield	30
HandPrints Killara	1 Ridgeland Ave, Killara	Killara	58
Inspire Roseville	28 Lord St, Roseville	Roseville	47
Kendall Street Kindergarten	Kendall St West Pymble.	West Pymble	40
Killara Beehive Child Care Centre	1 Ridgeland Ave Killara	Killara	61
Killara Childcare Centre	18 Fiddens Wharf Road	Killara	43
Killara Kids Incorporated	1 Ridgeland Ave Killara	Killara	90
KU Bradfield Park Children's Centre	51/53 Bradfield Rd Lindfield	West Lindfield	53
KU- Killara Park Pre School	72A Springdale Rd, Killara	Killara	40
KU-East Killara Pre School	24 Fairbairn Ave, Killara	Killara	42
Ku-ring-gai Family Day Care	818 Pacific Highway, Gordon	Gordon	N/A
Lady Game Community Kindergarten	Cnr Moore Ave and Bradfield Rd, Lindfield	West Lindfield	40
Lindfield Activity Centre	218 Pacific Highway, Lindfield	Lindfield	155
East Lindfield Before & After School Care	90 Tryon Rd, Lindfield	Lindfield	85
Lindfield Montessori Per School	9 - 11 Moore Ave, Lindfield	West Lindfield	40
Little Zak's Academy Killara	5 Manning Rd, Killara	Killara	78
Pinjarra Early Years Pre-School	68 St Johns Avenue Gordon.	Gordon	70
Pymble Turramurra Kindergarten	Cul-de-sac.	Pymble	45
Reddam House Early Learning School	15A Treatts Road. Lindfield	Lindfield	72
Roseville Pre School Kindergarten	15 Shirley Road.	Roseville	40
Roseville P & C Kids Care Association	19a Archbold Rd, Roseville	Roseville	75
St Ives Chase Kindergarten	Through road. 3 boundaries.	St Ives	40
Thomas Carlyle Child Care Centre	2c Carlyle Rd East Lindfield	East Lindfield	53
			1879
Proposed with DA submitted			
24 Bayswater Rd Lindfield			68
6 Eastern Rd St Ives			122
2-8 Eleham Rd Lindfield			200
101 Fiddens Wharf Rd Killara			60
29 Grosvenor Rd Lindfield			80
22 Highfields Rd Lindfield			76
1 Lumeah Rd Lindfield			80
			686
New Centres Proposed by Council			
UTS			N/A
Lindfield Hub			N/A
Reference documents: Information collected by Loyal Henry members and Spot a Childcare www.spotachildcare.com.au/home			
CONCLUSION:			
No of existing child care facilities which have been identified in Roseville, Lindfield and Killara 26 providing 1,616 places			
Add 6 proposed facilities providing 564 place = TOTAL places 2,180 (excl those new centres being proposed by Council)			
Prepared: 28/02/17			

[illegible]