



Director Industry and Infrastructure Policy
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001



Dear Sir/Madam

Infrastructure SEPP Review and Proposed Educational Establishments and Child Care Facilities SEPP

Thank you for the opportunity to comment on the proposed changes to the *Infrastructure SEPP* and the proposed *Educational Establishments and Child Care Facilities SEPP*. Queanbeyan-Palerang Council has reviewed both proposed SEPPs and has provided comments in respect of each as set out below.

Infrastructure SEPP

Health Care Facilities

The proposal to include both the R2 Low Density Residential and the B1 Neighbourhood Centre zones as 'prescribed zones' for health care facilities is not supported and should be given further consideration. Both zones are traditionally been used to accommodate developments that are unlikely to have an impact on the residential amenity of low density areas. Hospitals, and other health care facilities, are not considered to be consistent with the intent of the zones. It is noted health care facilities are already permissible in all other residential zones under the current SEPP. Council believes low density residential zones should be reserved predominantly for low density uses that protect the residential amenity of neighbourhoods.

A further example of this would be the proposal to allow certain developments as complying development within the boundaries of a health services facility. While the idea of expanding complying provisions to these developments are generally supported, allowing development up to 12 metres in height would not appear to be consistent with protecting the amenity of low density residential areas. It is recommended any complying development be limited to the height shown on the respective height of buildings map under the local environmental plan for that zone.

No rationale in respect of why these additional zones are proposed to be prescribed under the relevant division has been provided. Council's view is such a proposal could lead to significant land use conflict.

Exempt Development on Operational Land

Council supports the proposal to expand the list of matters that can be undertaken without development consent on operational land. However Council would suggest setting out those additional matters under the relevant clause rather than referring to clause 65(3) located elsewhere in the SEPP.

Other Matters

Other changes proposed in respect of police service facilities, commuter hubs and lead in water and sewerage infrastructure are supported. Other operational and housekeeping changes are logical and are also supported.

Educational Establishments and Child Care Facilities SEPP

Early Childhood Education and Care Facilities

The proposed new definitions to cover the range of child-care services available are supported.

The proposed heads of consideration for development of child care services on industrial zoned land are also supported.

The provision of appropriate parking facilities, both for staff and parents, are crucial for child care facilities to function well and it would be desirable to see this reinforced in the policy, possibly through the adoption of some standard for car parking or drop of areas. The *Child Care Planning Guideline* is largely silent on this issue.

Schools

Having appropriate road and parking facilities to accommodate staff and student numbers is crucial. It is noted that there is a proposal to allow one storey portable classrooms as exempt development under the proposed policy. This provision has the capacity to undermine other proposed provisions such as requiring Roads and Maritime Services (RMS) to comment on complying development proposals that would attract 50 or more additional students. It is likely 2 portable classrooms alone would allow for an extra 50 students however no input from RMS would be required for this exempt development.

This is also potentially an issue for complying development proposals where proponents could simply undertake works incrementally, and in a manner that does not trigger a referral to RMS, and continue to do this for each development. To address this there needs to be a restriction on how much exempt and complying development can be cumulatively undertaken under the proposed policy.

Allowing 4 storey development as complying development should also be reconsidered. As previously noted, allowing such significant heights in what may be low density residential areas could introduce land use conflict. It is recommended any complying development be limited to the height shown on the respective height of buildings map for that zone.

Universities

Similar to the comment above, it is recommended any complying development be limited to the height shown on the respective height of buildings map under the LEP.

If you wish to discuss any of the comments raised in this submission, please contact Mr Martin Brown, Team Leader - Strategic Land Use Planning, on (02) 6285 6277 or Martin.Brown@qprc.nsw.gov.au.

Yours sincerely



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