



24 April 2017

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



PCU070641



Dear Sir/Madam

Submission in response to Draft Education and Child Care SEPP

Thank you for the opportunity to respond to the abovementioned SEPP. We understand that it is being proposed to better facilitate approvals for new and existing development in relation to education and child care. As a leading College on the North Shore, we feel that we can make a contribution to the proposal and would like you to consider our comments below.

Upgraded Facilities

The SEPP recognises the need to expedite the realisation and delivery of upgraded school facilities within a framework of quality and appropriateness, this we feel is very positive and will help meet the demands of a growing population.

Development without Consent

The community has a reasonable expectation that development will not be ill-considered. In that light, we suggest that those undertaking assessments should be experienced industry professionals or, such assessments should be peer reviewed.

Development Limits on Size

The limits on the number of storeys of developments we feel could work against the principles of sound planning and land use. We believe that given the shortage of developable potential in the area, a two storey limit would be more practical.

Determination of School Numbers

It is very difficult to accurately predict staff numbers and student intake numerically. Student populations fluctuate due to a number of factors. We recommend a 5% cap rather than an overall cap for all educational facilities.

Referral to RMS

We do hold some concern in terms of referring to the RMS in relation to parking considerations. We accept that traffic and parking considerations are necessary with every school development but feel that having to refer to the RMS is time consuming.

There needs to be a time limit on responses and/or assessments made through the RMS. Alternatively, assessments completed by qualified traffic engineers would be most effective.

Better Schools Design Guide

We are supportive of the Guide. We do believe it is slightly biased in terms of teaching approaches. Development standards should not have any jurisdiction over pedagogical approaches. This should remain as part of the NESA registration process. The guide should remain a guide and not an assessment tool.

Complying Development Certificate

We do not support the proposal that CDS's must be issued by Council in order to ensure they have oversight and involvement in the development of school infrastructure. Appropriately qualified certifiers continue to work successfully under the I-SEPP. Introducing this restriction would work directly against the aims of the E-SEPP and proposed changes.

Storey Restriction

We do not support storey restrictions. The previous I-SEPP height control of 22metres works well to control bulk and scale. We suggest omitting the reference to storeys and retaining height restrictions.

Exclusion of Underground Car Parks

This does not appear to assist in the aims of the E-SEPP as these facilities would be valuable in creating spaces for teaching and learning while minimising the impact on vehicles.

Rural Fires Act vs SEPP

There is an inconsistency between the Rural Fires Act and SEPP instruments that requires some clarification. S110 (B) (6) (a) prohibits Complying Developments classified as "special fire protection purpose". We would prefer that the reference to schools be deleted from this.

State Significant Development

We do not agree that all new schools should be 'State Significant'. The legislation could refer to student population figures rather than just capital cost. A system requiring a preliminary meeting with the Department to ascertain the appropriateness of a SSDA in connection with a Council DA process may be easier for small and/or low resource schools.

Once again, thank you for the opportunity to respond to the Draft SEPP.

Yours sincerely



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PRINCIPAL