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The Hon. Jackie Trad MP
Deputy Premier, Minister for Infrastructure, Local Government and Planning
and Minister for Trade and Investment
Department of Infrastructure, Local Government and Planning
PO Box 15009
CITY EAST QLD 4002

Dear Deputy Premier,

RE: REVIEW OF PLANNING INSTRUMENTS AND PROVISION OF FUTURE SCHOOL INFRASTRUCTURE

Independent Schools Queensland (ISQ) and the Queensland Catholic Education Commission (QCEC) represent the interests of some 500 non-state schools, educating around 267,000 students, or 33% of all Queensland school enrolments.

In our previous correspondence (December 2015) we raised various aspects of strategic policy affecting the planning and provision of future school infrastructure. We made mention of the important collaborative planning work that had been undertaken for some years between all three schooling sectors, with State and Local Government agencies; of our expectation that the State Government's planning reforms would give further impetus to this innovative and collaborative approach to schools planning; and of our commitment to build on this work through active engagement with the Government on the planning reform processes.

We thank you for your reply (1 July 2016) in which you advised of the amendment to the Planning Bill giving non-state schools exemption from future adopted infrastructure charges for development under a designation. Cost reduction through this exemption is expected to enhance the viability of all such developments.

Of continued interest to our members are the administrative processes that will apply to a designation under the *Planning Act 2016*, as applied to schools. We seek to remain engaged and consulted as appropriate as these processes are devised.

In support of the reforms to the planning framework, we are pleased to offer our comment on the consultation drafts of a number of planning instruments, in particular, the *State Planning Policy, Planning Regulation, Ministerial Guidelines and Rules* and *SEQ Regional Plan*.

State Planning Policy

We note that a number of State interest policies may influence the future provision of school infrastructure, in particular 'Liveable communities', but also 'Development and construction' and 'Planning for infrastructure'.

Liveable communities

The 'Liveable communities' policy expresses the State interest that 'community facilities and services, including education facilities (state and non-state) ... are well-located, cost-effective and multi-functional' (p.23). We endorse the retention of the sector-blind position that ensures this State interest is applicable to all schools.

Of ongoing interest to us will be the application of this position to local planning schemes and thereby to the timely provision of new school infrastructure at the local level. The important and well-regarded collaboration that has produced high level planning material in the form of 'demand maps' provides a reference for local governments about potential future school requirements – as referenced in the current *State Interest Guideline – Liveable Communities* (April 2016).

The current process of review of local planning schemes for integration of State interests provides little opportunity for input from non-state school authorities. We believe that a structured process where non-state school authorities can participate in these State interest reviews would enhance the planning process in relation to schools.

Development and construction

This State interest articulates strategic policies giving direction to appropriate land use planning. As providers of services and infrastructure for around one third of Queensland's schoolchildren, the non-state schooling sectors welcome clarity and certainty in planning for land use, including for essential community facilities such as schools.

Limited access to suitably zoned educational sites remains a barrier to the efficient delivery of school infrastructure. Early front-end planning and zoning for educational use, with sites of suitable size and location, is necessary to ensure the supply of land for this use, at affordable cost i.e. with relevant zoning, such sites should be valued accordingly to reflect educational use rather than higher valued alternative uses.

Local planning schemes need to ensure there is adequate provision made for the siting of new educational facilities as communities change and grow. The extent to which this State interest promotes better local planning for educational facilities will determine the efficiency and timeliness of provision of all schools, whether state or non-state.

Planning for infrastructure

This State interest points to the critical role infrastructure plays in building our communities. In particular, the draft State Planning Policy identifies 'hard' infrastructure – such as trunk networks and key transportation nodes.

Just as critical for community building is the planning of social infrastructure such as schools, hospitals, and other community facilities. Well-planned and efficiently delivered social infrastructure requires sustained focus and considerable resources to be achieved. We believe it is in the State interest that all types of essential infrastructure be identified.

We note that the State Infrastructure Plan includes a priority for the development of a Social Infrastructure Strategy that includes the provision of educational infrastructure such as schools. We commend the Government on this initiative and we would appreciate an opportunity to provide input to its development.

Planning Regulation

Schedule 18 of the Regulation prescribes (for s.112 (1) of the *Planning Act 2016*) the amount of adopted infrastructure charges for various types of facilities. For an educational facility, these charges are \$140 per sq.m global floor area (GFA) and \$10 per sq.m imperious to stormwater.

These amounts are the same as the charges applied to commercial (office) and commercial (bulk goods).

Non-state schools are essential community infrastructure established and operated by not-for-profit community based groups. As such, we propose that these charges be aligned to those for other community facilities, such as places of assembly (community use) i.e. \$70 per sq.m GFA and \$10 per sq.m impervious to stormwater.

Alternatively, the adopted charge could be calculated on a per-student enrolment basis rather than GFA. Independent advisory group, *Integratn*, commissioned by the Queensland Department of Education and Training in 2013, reported such a measure was more accurate and appropriate for schools (i.e. educational facilities) than the use of GFA. (*Development of a Schools Infrastructure Charge*, October 2013)

We note 'Schedule 2 – Zones for local planning instruments' stipulates a community facilities zone to provide for community-related uses, activities and facilities, whether publicly or privately owned, for example – educational establishments (such as schools). These provisions support the appropriate zoning for schools.

Further, we note s.13 references schedule 5 that prescribes for s.36 of the *Planning Act*, the infrastructure that can be the subject of designation of premises for development of infrastructure, including educational facilities. These provisions support the application of Ministerial designation for both state and non-state schools.

Interim Minister's Guidelines and Rules

We note that s.69.1 of the Guidelines and Rules deals with non-public sector infrastructure entities and stipulates that a proposal include evidence of early engagement with the State department responsible for the type of infrastructure proposed.

Currently, the Minister for Education administers designation for state and non-state schools and engagement between the school proponents and the Minister occurs from early stage. This section continues the requirement for this early engagement.

Section 69.2 requires formal endorsement from the chief executive or another established endorsement process. We are keen to explore how this requirement will be made operational. Currently, the Education Minister decides on eligibility for government funding for new non-state school services/sites upon recommendations of the Eligibility for Government Funding Committee, Non-State Schools Accreditation Board. In effect, the Minister's decision on funding eligibility influences whether the proposed new non-state school service/site could proceed. Where such a school subsequently applies for designation, would Ministerial approval at this earlier point be sufficient to represent formal endorsement?

We would appreciate the opportunity to have input to the development of operational guidelines for the designation process, as these will apply to non-state schools.

SEQ Regional Plan (*ShapingSEQ*)

The SEQ Regional Plan provides for the State's interests (State Planning Policy) to be articulated specifically for Queensland's major region of economic and social activity. The Plan supports the relevant local planning schemes to manage future land use and infrastructure developments in this region.

The Plan acknowledges the importance of education services and infrastructure to the future of the region. Education services are currently in the top five industries in the SEQ region and this will continue into the future. High quality schools are attractive to families of school-aged children who decide to reside and work in the region, making for liveability.

New communities grow where land supply is created to meet a range of uses and essential infrastructure is provided in a timely manner.

Importantly, the Plan encourages the development of more complete communities where residents can work and recreate where they live – rather than travel daily long distances from their homes to work. This approach to planning communities runs counter to broad trends to date where housing is placed in dormitory suburbs on the urban edge (where greenfield land is available) while new jobs growth accelerates in the urban centre, such as the capital CBD. These trends exacerbate the ever-growing traffic issues that then influence liveability and housing affordability.

In this context, the land supply enabled by local planning schemes needs to ensure sufficient sites are well located for essential community infrastructure such as schools. Planning schemes need to ensure appropriate zoning is undertaken to secure these sites. Failure to do so has the potential to cause undesirable levels of under-provision, poorly timed provision or limited schooling choices for parents.

The Plan identifies a number of locations for future urban development over the next twenty-five years, including new communities such as Greater Flagstone, Yarrabilba, Caboolture West and Ripley Valley, amongst others. Essential community infrastructure such as schools, whether state or non-state, needs to be planned for well in advance and allowances made for sufficient land to accommodate these facilities through appropriate zoning and designation.

Our respective sectors remain committed to being partners with state and local governments to deliver schooling services and infrastructure in these new communities.

Through seeking higher rates of in-fill development, the Plan supports increased housing density around key centres to take advantage of existing infrastructure. The resultant increased populations seek additional services, including additional school services and facilities.

This scenario has been clearly illustrated over recent years in southern capital cities where inner city developments, resulting in increased populations, have led to pressures on existing school provision, necessitating the creation of new high-rise schools in the inner city.

To prosper, to extend our economic activities and advantages, we need high quality education and training facilities and services that are accessible and relevant to skill the future working population.

Quality schools, well located, are integral to the Plan's vision for SEQ:

“Our investments and our reputation in health, and education and training will create a highly skilled workforce that is a major advantage for our economy. They will also attract people who want to learn and prosper in SEQ.” (p.24)

Non-state schools are key contributors to this endeavour and purpose.

More than ever, urban planning recognises the importance of modern critical infrastructure, such as the transport system and telecommunications networks, to the development of desirable and connected communities.

Integration of land use and infrastructure planning is essential to promote better community outcomes. We note that education facilities need access to efficient student travel options and fast, efficient online services. To manage before and after school traffic issues, a stronger focus on public and active transport should continue to be encouraged e.g. more, safer walkways, cycle paths and public transport options.

We believe it is critical that the regional plan clearly incorporates the State Planning Policies, and State interests, so that local planning schemes are more aligned, informed and useful for implementation of the intent of these strategic policies.

An important outcome would be better state and local planning for social infrastructure such as schools, whether state or non-state.

We thank you for the opportunity to provide our comments on these draft planning instruments.

Yours sincerely,



**David Robertson
Executive Director
Independent Schools Queensland**



**Dr Lee-Anne Perry AM
Executive Director
Queensland Catholic Education Commission**