

Submission
No 38

INQUIRY INTO PLANNING AND DELIVERY OF SCHOOL INFRASTRUCTURE IN NEW SOUTH WALES

Organisation: Federation of Parents and Citizens Associations of NSW

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Planning and delivery of school infrastructure in New South Wales

Submission to the NSW Portfolio Committee No. 3 - Education

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Introduction

Federation of Parents and Citizens Associations of New South Wales (P&C Federation) is thankful to the Portfolio Committee No. 3 - Education (the Committee) for this opportunity to contribute to the Planning and delivery of school infrastructure in New South Wales (the Inquiry). P&C Federation supports the position of individual educational and developmental needs met by a range of differential services expressed through appropriate and well-planned curricula, programs and environments conducted by sensitive and well-trained personnel in conjunction with parents¹ and families.

The core belief of P&C Federation is that the education of our children and youth is the most fundamental means of ensuring individual and collective success and, as a result, our greatest national resource. We also support the concept that it is primarily the responsibility of governments to ensure education is well rounded and fully funded.

P&C Federation is a representative voice for public education in NSW. With over 1800 member associations, our understanding of the issues within education is broad and carries with it the voice of a substantial body of parents and carers.

Preamble

P&C Federation notes that few School Infrastructure NSW (SINSW) processes are publicly available. This opaqueness of SINSW has hindered P&C Federation's ability to respond in detail to the Inquiry, and much of our response is based on the Auditor-General's report and anecdotal evidence from our P&C Association members.

Terms of Reference

(a) the implementation of recommendations of the 2021 Auditor-General's Report entitled 'Delivering School Infrastructure'

We note there is no detailed response from the Department to the problems raised in the Auditor-General report. The Department's responses to the recommendations are very brief, and many of the relevant SINSW policies are not publicly available. This renders it difficult to evaluate how effectively and to what extent the Auditor-General's recommendations have been implemented. To take two examples:

- The Department's response to Recommendation 3 states the 10-year Capital Planning Limit *"was taken to the 2020 SASP update, and will be re-prosecuted in 2021"*. The Auditor-General report noted that a key problem with the 10-year Capital Planning Limit is 'interim'. Therefore, the only funding that is certain is that allocated yearly through the Budget. From the Department's response, it is unclear whether or to what extent this has been addressed.
- The Department's response to Recommendation 7 states a post-occupancy evaluation report and framework will be released in 2021. To our knowledge, this report and framework are not publicly available, so we cannot assess whether it is in line with the Auditor-General's report.

¹ "Parent" refers to anyone with legal care of a child, such as a parent, carer or legal guardian

It is also unfortunate that the government considered the six-month timeframe suggested by the Auditor-General to implement the recommendations too short and opted instead for a twelve-month timeframe (i.e. by April 2022). The result is that the recommendations will not be implemented in time for the 2022-23 budget cycle. The Auditor-General's report clearly stated that the shortfall in forecast classroom requirements would begin in 2023, so addressing shortcomings in the Planning and delivery of school infrastructure should be given urgent priority now.

Also concerning is that each recommendation was accepted by the Department only 'in principle', which renders the acceptance somewhat optional. We are concerned that the 'in principle' qualifier may allow the Department to avoid fully implementing the Auditor-General's recommendations. P&C Federation would have preferred a less ambiguous response from the Department.

Recommendations

- For transparency purposes, SINSW should make more of its processes and policies publicly available so that stakeholders can more easily assess its works and understand its priorities.
- Better accountability through regular public reporting of the targeted delivery of upgrades and new school builds, by year, and the actual delivery, by year, against the targets.

(b) the adequacy of plans by the NSW Government to deliver educational facilities for every NSW public school student

It is concerning that the Auditor-General found that some business cases for school developments are reverse engineered to fit pre-announced funding, which may result in under-scoping and delays in the project delivery.

It is also concerning that planning around school infrastructure is shaped by election commitments and other ad hoc political factors. The Auditor-General outlined that most new and upgraded schools announced from 2018-2021 were not identified by SINSW as priorities in its Capital Investment Plan.

In our view, planning for new and upgraded schools should be determined purely by community need. Allowing other political factors to shape this planning risks diluting the effectiveness of SINSW's work and significantly impacts the educational outcomes of children attending schools that are deprioritised.

The issue of 'pork barrelling' surfaced as a topical issue in NSW politics in late 2021. In response, NSW Premier Dominic Perrottet stated, "*no government should invest for partisan purposes; it should invest where need is*".² P&C Federation would hope and expect that the delivery of new and upgraded schools is only based on need.

Recommendations

- Create robust policies requiring investment in school development to be determined purely by community need and explicitly ruling out political considerations in investment decisions.
- These policies should be publicly available along with the business cases that support any priority.

² Budget Estimates. *Portfolio Committee No. 1 – Premier and Finance*, corrected transcript. 4 November 2021. Page 13

- More transparency re classroom accessibility, play spaces, play equipment, accessibility for children with a disability, amenities for staff and students.
- Introduce sustainability management plans for schools.
- Develop a mandatory state-based or national standard for air quality in schools, including ventilation, air conditioning and air filtration.
- P&C Federation should be included as a key stakeholder in the state-wide planning of school infrastructure.

(c) [the adequacy of investment in new or upgraded infrastructure at existing NSW public schools and in new school projects](#)

The state of infrastructure in NSW public schools is highly mixed. This is exacerbated by the reliance for many years on demountable classrooms to meet the needs of a school. This is often to the detriment of students, as demountable buildings are often rudimentary and may suffer from mould, poor insulation, leaks and other structural issues.

In our view, demountable classrooms should be strictly a short-term measure. While they are a practical and cost-effective solution for schools experiencing a rapid surge in enrolments, they should not be used as a semi-permanent or permanent solution. The Department should immediately begin planning for and investing in long-term infrastructure in schools where the projected enrolment growth will be sustained or maintained for more than two years. Long-term experience has shown that demountable classrooms have unofficially become long-term structures, and the building of more permanent classrooms is put off indefinitely.

P&C Federation is also aware of situations where the number of demountable classrooms in a school proliferates, but the number of toilets remains stagnant. This was the experience of Castle Hill High School (with 2021 students, 50 demountables). When the school's P&C Association raised it with the local member, SINSW made the school principal an offer of portable toilets on the main school oval. The only reason the issue was appropriately resolved was that the school principal refused to accept that children should be denied a fundamental human right and held that schools should not have to pay for portable toilets out of their education budgets. We expect there are other rapidly growing schools experiencing the same issue.

The problem is illustrated by the fact that numerous new schools are relying on demountable buildings:

- **Gledswood Hills Public School** – as of December 2021, there were 22 demountables. The NSW Minister for Education stated this is to "*accommodate student demand while the project to deliver additional permanent teaching spaces is being delivered.*"³ No timeframe was provided by either the Minister or SINSW as to when this would be completed.
- **Jordan Springs Public School** – there are 8 demountables on this site only a year after opening. The Minister has hinted that they are developing more permanent teaching spaces. No timeframe was provided by either the Minister or SINSW as to when this would be completed.

³ NSW Legislative Council Questions and Answers, no. 651, question 7886, 20 December 2021

- **Riverbank Public School and The Ponds High School** – overcapacity within 4 years of opening with over 30 demountables at the high school as of 2020.

In February 2021, a media analysis found the following additional examples of new schools utilising demountables:⁴

- **Armidale Secondary College** – allocated 11 demountables since opening in January 2021
- **Wentworth Point Public School** – allocated 6 demountables since opening in 2018
- **Ballina Coast High School** – allocated 8 demountables since opening in 2019.

While the reliance on demountable classrooms for an extended period is a symptom of inadequate planning, a large number of demountable classrooms in new schools is a clear sign of projections and planning failures.

Recommendations⁵:

- Urgently review the forecasting process of population changes to ensure adequate school infrastructure to meet future demand. In particular, planning needs to be aware of the fast pace used by developers when constructing housing and acknowledgement that families live in medium to high-density housing
- Require demountable classrooms to be in place for no more than 24 months before being replaced by permanent or semi-permanent classrooms.
- If a school believes it requires demountable classrooms for more than 24 months, that should be clearly demonstrated while more permanent solutions are implemented.
- Catalogue and publish an annual list of all demountable classrooms in use for more than 24 months and consider this list in setting infrastructure priorities.
- For new schools, land must be set aside for future development that does not impact playground availability.
- There must be a long-term commitment from the NSW Government to fund government school infrastructure adequately, both for new schools and maintaining existing school sites. Schools should not rely on parent and community contributions to fund essential infrastructure.
- There must be an urgent priority to ensure existing schools have the same or similar infrastructure supplied to new school builds.

(d) the role of local community organisations and groups in responding to the lack of or shortage of educational facilities at any NSW public school, especially in areas of high growth and in proposed new suburbs

The degree of community consultation for new school developments is generally poor to non-existent. Most decisions are made behind closed doors, with the community only consulted very late in the process. Sometimes new developments are announced almost as a fait accompli. According to the

⁴ Daily Telegraph, 23 February 2021, School demountables: Which new campuses have the most portable classrooms

⁵ P&C Federation has previously put these recommendations to the Department of Planning, Industry and Environment, in its 2020 review of the Education SEPP ([link](#)).

Auditor-General, "*SINSW processes do not always allow for early consultation because doing so may raise stakeholder expectations the project will proceed where funding is still uncertain.*" P&C Federation does not consider this a valid or satisfactory explanation for excluding consultation. It is an excuse to exclude community participation until the project has been designed, contracted and underway.

Although the SINSW uses a project reference group for each build, in our experience, there is minimal community representation or consultation from parents. Any community representative on a project reference group is subject to confidentiality and therefore unable to communicate or share with the broader community. In past decades, P&C Associations were formed early and were instrumental in shaping new schools, including assistance and consultation in school facilities and staff appointments. The current norm is to leave the formation of a P&C Association until the school is fully established and operational. While some community groups, such as the local AECG, are rightly consulted throughout a project's development, the involvement of parents and P&C Associations occurs almost as an afterthought.

Marsden High School and Meadowbank Public School are examples of lack of consultation. The NSW Government proposed in 2018 to relocate to a much smaller site with cramped conditions, poor access and inadequate playground space. The Department did not consult any of the affected community groups nor provide any demographic modelling to justify the decision. This created great concern in the community.

Another example is the merger of Murwillumbah High School, Murwillumbah East Public School, Murwillumbah Public School and Wollumbin High School, which was announced without any community consultation. This blindsided parents and created considerable concerns within the community. This was not helped by the lack of information available at the time of the announcement.

Recommendations

- Undertake good-faith consultation with the school community, including local P&C Associations in relevant schools, including adjoining and feeder schools. This should occur early in the planning process.
- Widen community representation on project reference groups and remove the confidentiality restrictions that prevent genuine consultation
- Prioritise the formation of P&C Associations early in the planning and consultation process. Where this cannot be undertaken, P&C Federation should be involved in the process.

(e) the adequacy of demographic Planning for anticipated school enrolments

The anecdotal experience of the Department's demographic Planning is highly mixed. There are times when the Department seemingly does not fully consider the scale and speed of population growth in some areas, such as Western Sydney, and others where its infrastructure is underutilised, such as the Parramatta area.

This work is also hamstrung at times by the Department of Planning, Industry and Environment, which requires developments that allow for student or staff increases greater than 10% of the previous 12 months to apply for approval, which slows the speed of these developments. There were concerns

that this disadvantages small non-metropolitan schools with very low student numbers, whose annual enrolments could easily fluctuate by over 10%. The Planning Department recently suggested amending this rule to allow for the development of school facilities by a public authority without development consent within the boundaries of an existing school equivalent to an additional classroom (30 students) or 10% of the current student or staff numbers, whichever is the greater.

However, while the proposed change benefits small schools, it overlooks that small non-metropolitan schools are not the only schools unfairly constrained by this 10% cap. Government schools throughout the Sydney Basin may have growth rates of over 10% and more than 30 students due to population growth. In four P&C Federation electorates with high population growth – Macarthur, North West Sydney, Sydney and West Sydney – we found that a majority of schools with enrolment increases of over 10% grew by more than 30 students.⁶

Recommendations

- undertake and publish demographic studies in the near locality and any logical contiguous area, taking into account the short, medium and long term population projections and urban design scenarios of the relevant state planning authority and the relevant local government authorities.
- Work with the Department of Planning, Industry and Environment to allow school development intended to meet enrolment surges in a timely manner.
- Monitor the progress of developments in high growth areas and be reactive to accelerated growth

(f) delays in converting new school announcements into site identification and school construction

P&C Federation has noted examples of this occurring, and the Auditor-General has outlined some of the reasons for this occurring.

Recommendations

- The Department should implement the Auditor-General's recommendations and make more of its processes available to the general public.

(g) specific planning for new schools and increased enrolments in Western Sydney, the Canada Bay local government area and on the far north coast

Generally, planning occurs entirely in secret behind closed doors. Specific areas in the Sydney basin, including Western Sydney, North West Sydney, and Canada Bay, are all experiencing considerable growth, which the Department is struggling to keep up with. A simple drive through these areas would give most people a very clear idea of the coming population explosion and subsequent demand for schools. Yet schools are not being built fast enough.

One of the most underestimated factors is the rate at which developers can establish housing developments. With advancements in construction techniques and greater use of template style homes, development timeframes have almost been halved compared to several decades ago. This places the Department's planning estimates on the back foot as families move into new areas much

⁶ Figures based on 2017-2018 school enrolment figures by head count - <https://data.cese.nsw.gov.au/data/dataset/nsw-government-school-enrolments-by-head-count>

faster than anticipated. Adding to this is the increase in housing density, with new suburbs now being mixtures of tightly packed single dwellings, medium-density duplexes and high-density apartments

(h) school design that promotes health and safety

The only systemic school health and safety problem that P&C Federation is aware of is the frequently poor design of demountable classrooms and the lack of toilet facilities in expanding schools mentioned in c above. Apart from this, while there are undoubtedly individual cases of unsafe design in schools, we are not aware of any specific widespread problem in this area.

Recommendations

- That any significant expansion of school enrolments involving the use of significant numbers of temporary classrooms must also involve the mandated upgrading of toilet facilities.