

WACSSO Submission Paper
Draft Operational Policy 2.4
- Planning for School Sites



Acknowledgments

WACSSO acknowledges parents as the first educators in their child's life. We celebrate and honour the diversity of families and recognise the vital role they play in supporting children and young people throughout their learning journeys.

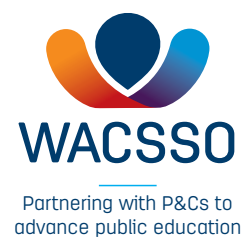
This submission has been prepared with the help of Western Australian public school parents, Parents and Citizen Associations and school communities. WACSSO would like to thank those parents who have shared their experiences and concerns regarding issues relating to school planning.

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Contents

Who is WACSSO	1
Contact	1
Introduction	2
Issues Relating to Planning:	3
Overcrowding	3
High-Density Housing	4
Re-Use of School Sites	4
Travel to School	5
Linking Schools with Community Spaces	5
Fast-Food Outlets Near Schools	6
Conclusion	7
Reference List	8

Who is WACSSO

The Western Australian Council of State School Organisations Inc. (WACSSO) is the peak body representing parents of public school students in Western Australia. WACSSO provides services and representation at State and National level to over 660 Parents and Citizens Associations (P&Cs). WACSSO is largely a volunteer organisation made up of a President and State Councillors (representatives) from geographically based electorates and, as such, the organisation has a wide representative reach across the state. WACSSO uses our strong networks with parents, carers and stakeholders in public education to inform our advocacy efforts. These connections allow us to highlight important issues for our affiliates, parents of children in public schools across Western Australia, as we strive to provide a collective voice¹.

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¹ WACSSO recognises the term “parent” to also include a child’s primary carer.

Introduction

WACSSO recognises that having a suitable physical environment for students attending school is of utmost importance to ensure young Western Australians have access to the best possible education and to make sure a child's schooling does not place any unnecessary burdens on families. The draft Operational Policy 2.4 – Planning for School Sites consultation process gives WACSSO the opportunity to give feedback on behalf of our affiliates, the P&Cs in government schools across Western Australia.

Matters linked to school planning are at the heart of many of the issues that our affiliates raise with us. Lack of access to on-site early childhood education and care, limited options for active and safe transport to schools, dangerous parking, oversubscription and undersupply are all issues that our affiliates have experienced and reported to us over many years. It is for this reason that WACSSO is pleased that this review acknowledges that the current situation has strategic planning deficiencies and suboptimal land use planning outcomes for school sites.

WACSSO is encouraged that the re-use of school sites will also receive scrutiny and that the importance of community consultation is acknowledged.

Whatever the outcomes of the final policy review, WACSSO expects that the decisions made about school sites will be informed by up to date data and future focused planning.

Issues related to Planning

Overcrowding

The plethora of transportable classrooms highlight the oversubscription and undersupply issues that impact on the amenity of many of our schools and the quality of the education children in government schools can access. These additional buildings reduce green space and playing grounds and in some cases are of an inferior quality.

Oversubscription is seen when families cannot access support for children with disability and other specialist needs without travelling significant distances due the facilities in nearby schools having no space to expand and meet enrolment needs.

WACSSO affiliates report overcrowding in areas with significant infill housing development and in new suburbs. We welcome the recognition of these issues in this policy review. Steps to require the Western Australian Planning Commission to have an increased responsibility to refer changes to the Department of Education for comment, so that incremental density change can be responded to more effectively at that stage of planning is a positive change.

The Operational Policy 2.4 – Planning for School Sites and those who enact the Policy must do more to ensure schools are equipped to deal with a range of issues they may face due to changes in area the school is located. A significant issue we have received feedback about is schools not being able to cope with capacity due to poor planning. For example, we received complaints about a high school which started out with year 7 & 8 cohorts, with the intention to expand to cater for years 7-12. Unfortunately, the school was at capacity after three years, only reaching year 10. To meet the demand the school had to use demountable infrastructure, which does not always provide students with the necessary facilities. The school could not meet the demand of students for a number of reasons, including students transferring from a nearby private school; the suburb was subject to rapid population growth; the construction of a nearby school was either delayed or not occurring quick enough; and new two new primary schools were being built in the area. WACSSO calls on the State Government to ensure that Operational Policy 2.4 is comprehensive enough to anticipate factors that will likely put certain pressures on schools, such as being over capacity; and to guarantee these policies can be appropriately implemented.

High-Density Housing

There are an increasing number of high-rise apartments being built in the Perth Metropolitan area, bringing a range of new challenges as high-density accommodation changes the demographics and infrastructure of suburban areas. It is imperative that the policy which determines the planning for school sites adapts to these changes in the Perth suburban landscape and show a comprehensive understanding of the needs and safety of students in their school environment in response to these changes.

A key issue WACSSO has received feedback from our affiliates about is increasing student numbers to schools following the development of high-density real estate. These sharp increases in student numbers can put significant pressure on the capacity of local schools. It is important that the planning of future schools, as well as upgrades to existing schools, show strong foresight based on sound demographic projections and has procedures in place to ensure schools can cope with the pressures associated with high-density housing.

Another area of concern amongst parents is the development of apartments or other high-density housing that clearly looks over school grounds – the increase in high-density housing will likely make this more common. This could pose a risk to a student’s privacy, safety, and their feeling of security whilst on school grounds. WACSSO understands that as apartment housing becomes more common it is inevitable that they will be in the vicinity of schools, however safeguards must be in place to ensure students safety and privacy are not infringed upon. The Operational Policy 2.4 must reflect these needs for safeguards and create a standard for State Government Departments and developers to work by.

Re-use of School Sites

WACSSO acknowledges that there are times when demographic change results in school population numbers dropping to a point where schools can no longer serve their communities effectively. Our own policy is clear that educational outcomes, not financial drivers, must be the primary reason for school closure. We also have a clear expectation that communities will be consulted if decisions about school closures are being considered.

We are reluctant to see school sites sold off permanently. This is of particular concern in metropolitan and large regional centres. The sale of a school site reduces the options of the provision of education in a suburb when older residents move on and are replaced by young families and/or there is an increased density of housing.

Any policy linked to planning for school sites must take into account the demographic cycle of a region and the potential increases in student numbers that other changes to planning policy will cause.

Travel to school

Lack of parking on or near schools' grounds, opportunities for active travel and road safety are issues that appropriate planning decisions can mitigate. Many P&Cs across the state assist with traffic management through the staffing of 'kiss and drive' facilities and we often hear from our affiliates of the dangers that accompany traffic movement around school sites. Affiliates have also brought to our attention the issues that the changed school leaving age has created regarding students parking on school grounds in greater numbers. The increased rates of childhood obesity also speak to a need to ensure that safe and active ways of getting to school must be parts of any planning decisions made around the initial design and any modifications to school sites.

WACSSO is in active dialogue with the Department of Transport about the role we can play to support the Your Move program but we expect that planning policy changes will increase options for active travel to schools and reduce the need for retrospective fixes to transport related planning problems.

Linking Schools with Community Spaces

Policy item 3.6.1, 'relationship to nearby land uses', highlights that it is desirable for schools to be surrounded by "public open spaces or other compatible community, cultural recreation and sporting facilities". WACSSO is not opposed to this policy, however our affiliates have notified us of concerns regarding shared public and school spaces which are subsequently being used as thoroughfares during school times by the general public. Feedback we have received showed that this can lead to parents, teachers and students feeling unsafe, particularly in areas where social issues are more prevalent. We acknowledge that this issue does not exclusively relate to one policy item within the draft Operational Policy 2.4 and could be addressed throughout the policy. For example, amendments could be made to policy items 3.3.5 'locational requirements of schools' and 3.6.2 'relationship to nearby land uses' to address these concerns. WACSSO asks that the Department of Planning, Lands and Heritage, with the State Government take into account these safety concerns when reviewing the draft Operational Policy 2.4 to ensure appropriate safeguards are in place to discourage schools from being used as thoroughfares by the general public.

Fast-Food Outlets Near Schools

WACSSO supports policy item 3.6.2, and the identification of what is deemed as undesirable land use due to the real and perceived impact on student health and safety. WACSSO urges the policy be amended to include fast-food restaurants. There is a body of research suggesting that students who attend schools located near fast-food restaurants and outlets are more likely to develop a range of dietary health issues, including obesity, asthma, hypertension, type 2 diabetes, cardiovascular disease and depression³. It is unacceptable that the location of a child's school may increase the risk of them developing health issues due to higher consumption of unhealthy food.

Fast food outlets come with a collateral of advertising , they reach out to children and young people through a plethora of platforms and day to day contacts. The Joint Statement of Protecting Children from Unhealthy Food and Drink Advertising on State Owned Assets carried the weight of reputable public health and medical organisations calling for State Government to address the targeting of our children by the fast-food industry¹. WACSSO believes it is essential that local school environments are protected from undesirable land use such as fast-food outlets.

WACSSO supports the targeted interventions referred to in the Western Australian Health Promotion Strategic Framework 2017-2021; and agrees that schools, and neighbourhoods are important environments that can influence children's health outcomes. We support the statement made in the framework that "environments that support good health may do so by promoting healthy behaviours; for example by making healthy choices the easier or more attractive choices; by ensuring equitable access to nutritious food; by providing safe and accessible active transport options; and by denormalising unhealthy or risky behaviours"².

WACSSO is a strong supporter of the Western Australian Department of Education Healthy Food and Drink Policy and traffic light system in school canteens and public schools. The traffic light system is now an accepted and normalised healthy food procedure in school communities across WA, demonstrating that policy can play a pivotal role in changing people's attitudes, and benefiting children's health.

Conclusion

WACSSO welcomes the opportunity to make comment on the draft Operational Policy 2.4 – Planning for Schools Sites. We are pleased that many of the issues that our affiliates have been raising with the Minister for Education and Training and the Director General of Education over many years appear to have been acknowledged in this policy review.

We look forward to seeing schools in Western Australia benefit from data driven and future facing planning policy.

Reference List

¹ Cancer Council WA. (2020). Joint Statement on Protecting Children from Unhealthy Food and Drink Advertising on State-owned Assets. Retrieved from <https://www.waschoolcanteens.org.au/wp-content/uploads/2020/09/2020-09-07-CCWA-Banning-Junk-Food-advertising-Joint-Statement-1.pdf>

² Chronic Disease Prevention Directorate. Western Australian Health Promotion Strategic Framework 2017–2021. Perth: Department of Health, Western Australia; 2017

³ Davis, B., & Carpenter, C. (2009). Proximity of fast-food restaurants to schools and adolescent obesity. *American journal of public health*, 99(3), 505–510. <https://doi.org/10.2105/AJPH.2008.137638>

⁴ Government of Western Australia: Department of Education. (2014). Healthy Food and Drink in Public Schools Policy. Retrieved from <http://det.wa.edu.au/policies/detcms/policy-planning-and-accountability/policies-framework/policies/healthy-food-and-drink-policy/?jsessionid=e95ab7b55bb8ed73ad057ef3e46b?bbp.9.policyID=22634973&bbp.s=10&bbp.e=select&bbp.10.pane=0&bbp.v=7&bbp.i=d0.l1.1.1.1.3.1.1.1.1&glln.enc=UTF-8>