

Burwood Council

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PCU070238

TRIM No: 17/14199 23 March 2017

Department of Planning and Environment Industry and Infrastructure Policy PO Box 39 SYDNEY NSW 2001

Dear Sir/Madam

BURWOOD COUNCIL SUBMISSION DRAFT CHILD CARE PLANNING GUIDELINE

Department of Planning Received 3 0 MAR 2017

Scanning Room

Reference is made to the Draft Child Care Planning Guideline released by the Department as part of the preparation of the Draft Education and Child Care State Environmental Planning Policy (SEPP).

Council supports the establishment of a Planning Guideline as a means to reinforce principles around the care and wellbeing of children within child care facilities, as well as protecting the amenity and local character for residents living in the vicinity of these facilities.

Council has reviewed the exhibited material and wishes to raise the following matters:

 Concern is raised that the Draft SEPP and Draft Guideline promote child care facilities in multi-storey buildings and allow simulated outdoor space in place of genuine outdoor space.

Children who access long day care are often in these environments ten hours per day, five days per week. The literature and studies on healthy and child-friendly environments stress the importance of spaces which are home-like, with stimulating play and learning opportunities, social interaction, quiet spaces for relaxing, and provide fresh air, and access to outdoor environments.

It is Council's view that simulated outdoor spaces should not be promoted by the Guideline, but be actively discouraged.

- In relation to vehicle parking rates, Council supports the Guideline's reliance on the existing parking rates in a council's Development Control Plan (DCP). It is appropriate that councils be permitted to set their own parking rates based on local circumstances.
- Council has been involved in a number of child care proposals where the child care facility is operating in conjunction with another institution or use, like a church or school. One of the major issues arising in these proposals is achieving an appropriate separation of the uses, particularly in respect to vehicle access and parking. Council has found there is pressure for existing parking spaces to do "double-duty", serving both the child care facility and church for instance. Where the church may be holding a funeral or other service, parking provision is stretched beyond its capacity.

Section 3A 'Location' of the Guideline outlines the matters for consideration in relation to a 'mixed-use development' where a child care centre is located on the same site as another use. Council requests that a further item be added to this list of considerations in respect to parking requirements for each of the uses on a site, and separation of the respective uses.

If you require information in other languages, please contact Burwood Council on 9911-9911. Staff will be able to organise an interpreter for you. Alternatively, you can contact the Telephone Interprete: Service directly on 131-450 (free service) and ask them to call Burwood Council on 9911-9911 on your behalf

APABIC
شطري هذا الرسالة على معلوسات منصة الذكافع عير فالرس شبى فيم محتراها الرشي الإنصال بالبليد على الرفع 1991 9911 بسلطين موغلس البلدية برعيت سناستا مشرجه تسريل الريكنكم الاتصال محدمة البرحمة البائنية على الرقع 450 131 (هذه الحدمة محالية) والطلب عليم الإنصال بالتادر سية شكم على الرئم 1991 9910
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CROATIAN
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GREEK
Η παρούσω επιστολή περισφή στιμοντικός ανηροφορίες. Αν δε μπορείτε να τη διαβάσεικ ή να καταλάβετε το περιεχομενό της Ι σαιρυκολουμε να επικοισωνήσετε με το Δημο του Εμπνορά στο 1911 9911 - Το προσωσικό μπορίτικο είναι Ιόει για διερμηνέα Ιλλλιώς μπορείτε να επικοινωνήσετε με την Τηλεφωνίκη Υπορεσίο Δερμαίνουν στο 131-450 (αυτή είναι δωρείν υπηροσία) του να ζητήσετε να επικοινωνήσει με το Δήμο στο 1911 (1911 σε μέρους σας:
TAJAN
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KOREAN
이 동자보는 중요한 당뇨기 엄마로 있습 <mark>니다. 만약 그 네</mark> 용은 안해 한테로 단하는 당하면 (PFR)를 받는다.
결화적화범위로 작가성에 연락하고 나무 <mark>요. 직원이 동역을</mark> 범진하도함 수 있습니다. 기타된 1,11 기타이
관화는 무효역)의 전환 회사에 진한 등 레 <mark>커비스를 찾으시</mark> 고 등역이 한편을 하는 3년 개선 25년 학생
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RUSSIAN
Это пновню содершит ва ваус вафорвоцию. Если зы на молете авсаков его вашловиль в э обдершание, поленуйсто свя штесь с Барвургами Советов на телефону 99 (1901). Наши сотрудники предоставит Бер пороводчина. Вы также вожеть сограться со Сличбой Тыпефонгого Периводо по телефону 101,450 (вто Сесплатном услуга) и попросить их посечель от Едирего вывым с Совет по телефому 99 (1901)
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- The SEPP argues that it is necessary to build more child care facilities in centres near to where people work. It is unclear if there is solid evidence to support this approach. Council's preference is generally for child care facilities to be located close to where people live, in residential areas, as opposed to resorting to multistorey commercial developments. The anecdotal advice provided by Council's community services staff is that parents prefer to leave their children in care close to home where there is more likelihood of developing friendships with other local families.
- It is recommended that the privacy and overlooking of children within facilities also be a matter for consideration. This is particularly relevant to the multi-storey child care model which occurs in town centres with other multi-storey buildings in close proximity.
- Council supports the Section 2.10 'Emergency and Evacuation' guidelines which involve the provision of safer balustrades and handrails for children in a fire stair, and a safe haven or emergency lifts in multi-storey buildings with child care facilities. However, concern is raised that these emergency measures are unlikely to be met in the case of retrofitting a child care facility into an existing multi-storey commercial building. Clarification is sought in respect to whether Council can refuse a child care facility in circumstances where the minimum standards are met, but these higher-level measures are not being satisfied.

Thank you for the opportunity to provide input into the SEPP and Guidelines. I trust that these comments will be considered by the Department in finalising the legislation and supporting material.

If you have any enquiries please contact Council's Manager Strategic Planning, Ms Diwei Luo, on 9911 9928.

Yours sincerely

BRUCE MACDONNELL

Deputy General Manager

Land, Infrastructure & Environment

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