

Amendment No. 103 Submissions – To rescind Policy No. 3.5.4 - Amusement Centres, Policy No. 3.5.9 - Stormwater Disposal from Premises and to amend Policy No. 3.5.3 - Education and Care Services (Day Nursery/Child Care Centres) and Policy 3.5.22 - Consulting Rooms

No	Name	Object or Support	Comments	Officer Comments
1	City of Subiaco	No Comment	The City has no comment or views on the proposed changes to the Planning and Building Policy Manual at this time.	Noted.
2	State Heritage Office	No Comment	We have no comments for the proposal.	Noted.
3	Swan River Trust	Support	No objection to the rescission of Policy No. 3.5.9 on the basis that the City's remaining Policy No. 2.2.10 stormwater drainage connections can appropriately address the issue of stormwater management.	The remaining policy no. 2.2.10 Stormwater Drainage Connections, does address the issue of stormwater management in the City of Vincent.
4	Councillor Maier	Object	<p>I do not believe there is any need for this policy: Policy 3.5.3 – Education and care services.</p> <p>Council of Australian Governments (COAG) agreed to develop national guidelines for education and care services in order to gain consistency across the nation. I do not think it is appropriate that we add another layer of regulation unless there is a specific local issue that should be addressed. It is not appropriate that we try and fix perceived shortcomings with the regulations, the goal is to get uniformity across the nation. Having each local government or each state adding their little bit would be contrary to the intention of the COAG initiative.</p> <p>The policy contains selected clauses from the National Regulation but in a sense these are an arbitrary, and very small subset of clauses from the regulations. Anybody setting up such a service must ensure that they are aware of the national regulations and that they comply with all requirements. Repeating some of the clauses in our policy does not add anything.</p> <p>If there are requirements that may be captured in other policies they should not have to be repeated in this policy. For example, Section 2.4 deals with parking and access and the clause basically says they need to comply with the parking and access policy. Similarly, signage requirements are specified in the signage policy.</p> <p>In summary, it does not seem much to be gained by having this policy as the requirements are covered in the national regulations or other City policies, If the policy is required it should just contain clauses that are not already in the national regulations or the City's policies.</p>	<p>Policy No. 3.5.3 addresses the differences in use and development requirements between family day care services and centre-based child care services.</p> <p>This policy is used by the City's Officers when assessing applications for the aforesaid facilities. The Education and Care Services National Regulations 2012 is a 345 page document which contains all requirements and policies pertaining to education and care services for all states in Australia. Policy No. 3.5.3 has the specific requirements which affect development of this kind in the City. Clauses contained in Policy No. 3.5.3 are in line with the regulations keeping the consistency of the National Framework.</p> <p>To avoid confusion and ambiguity all requirements such as car parking and access; and signage are referred to.</p>
5	Metropolitan Redevelopment Authority	Support	No objections.	Noted.