

Our Ref: CGC-33(1)

24 March 2022

City of Melville
10 Almondbury Road
BOORAGOON WA 6154

Attention: Troy Cappellucci, Senior Planning Officer

Dear Troy

38 POINT WALTER ROAD, BICTON – CHILD CARE PREMISES

This submission supports an application seeking planning approval to establish a 'Child Care Premises' on the subject land. The application is made on behalf of the owners of the land and future operator.

The use and proposed development are considered to accord with the planning framework, making development on the land and in the location acceptable. The proposal will sit appropriately on-site in a manner that neither impacts the locality nor detracts from the amenity and character of the area.

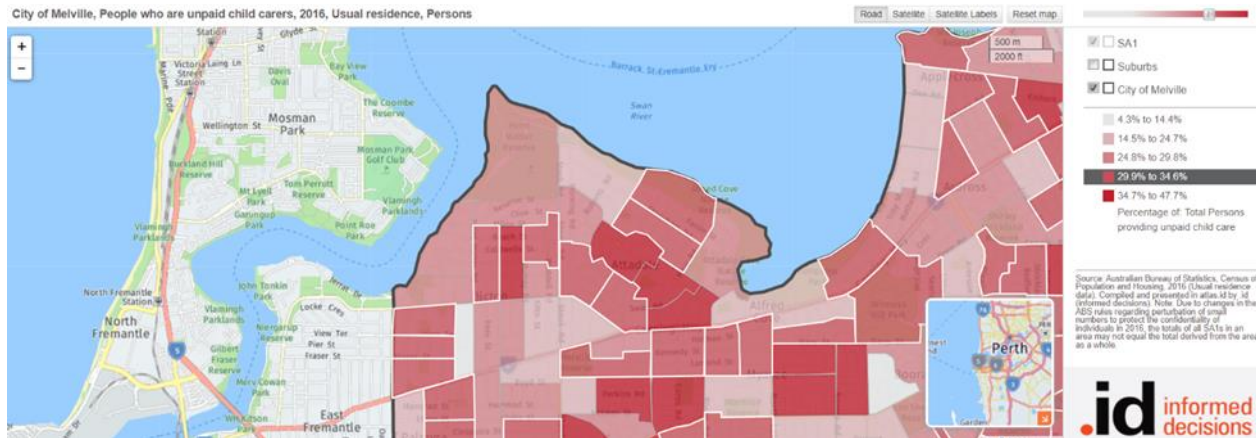
This report describes the background to the proposal, the site and its setting, the applicable statutory planning framework and the proposed development. It also presents the suitability of the proposal viz a viz the various planning objectives and controls that apply to the use, land and location.

CHILD CARE DEMAND

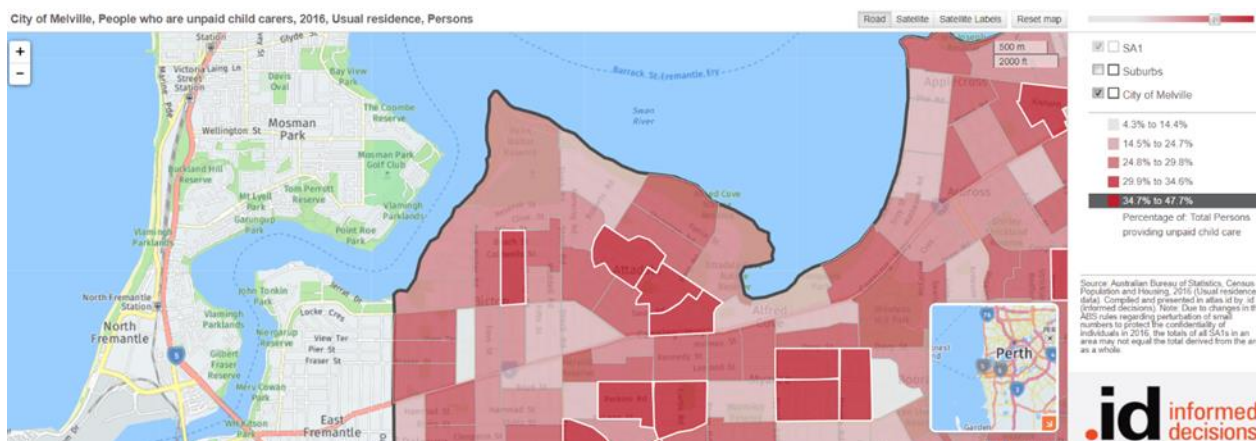
There is high demand for child care in Bicton due to a lack child care premises. At present there are 21 children of child care age (0-5 year olds) for every space available in existing centres.

The disparity between supply and demand in the area is significant (and has been this way over the last five (5) years).

As can be seen on the following page, Bicton has areas of unpaid child carers higher than the metropolitan average (28.7%, Source: idcommunity).



29.9%-34.6%



34.7%-47.7%

As stated (idCommunity) *The role of unpaid childcare in Bickton is determined by many different factors. For example areas with high levels of unpaid child care may have a dominance of single income families with one significant earner, or there could be a lack of provision of paid child care in the area.*

The concluding point above is certainly the case. Whilst based on 2016 Census information, the situation remains the same in 2022.

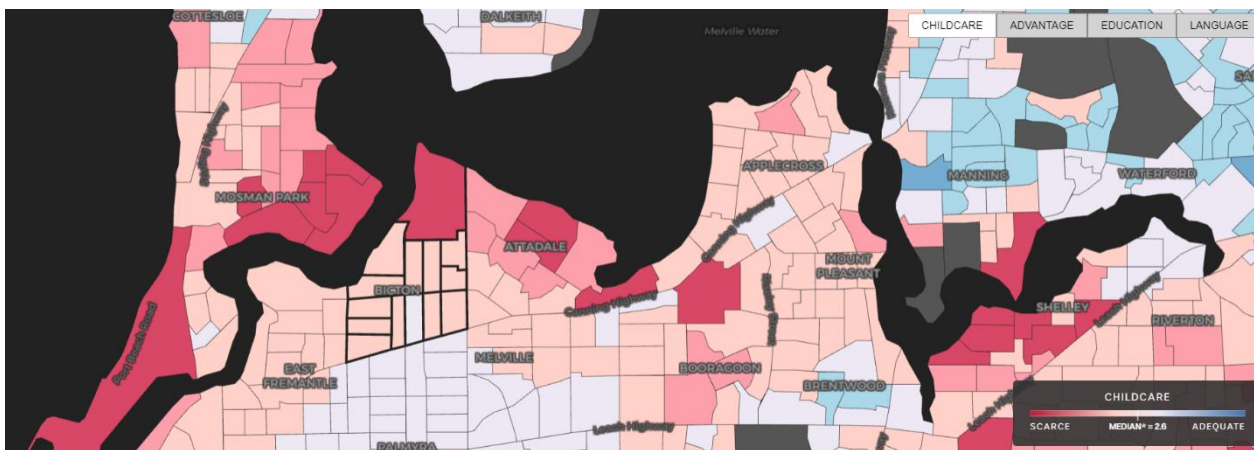
An ABC article 'Mapping Australia's childcare blackspots' (ABC, 22 March 2022 identifies ...

About 35 per cent of the population, or 9 million people, live in childcare deserts. That's more than one in three Australians.

This includes 1.1 million Australians — more than 4 per cent of the population — living in neighbourhoods with no child care available at all.

At the opposite end of the spectrum about 3.3 million people, or 12.7 per cent of the population, live in childcare “oases”, defined in the study as a neighbourhood where fewer than 1.67 children compete for each available place. This is the equivalent of three days of child care per week.

Accompanying the article were black spot maps for Australian capital cities. Consistent with the mapping on the previous page, there is a scarcity of child care services in Bicton. This scarcity is the basis for proposals seeking to address the imbalance, enabling community needs to be met.



SOURCE: ABC (22.3.22)

Where child care generally is important, the Australian Government Institute of Family Studies reports ... *Child care and early childhood education hold a key place in the wellbeing of families and their local communities. They provide key opportunities for children's development and social engagement, and for enabling families to engage fully in the labour market, each of which is important in contributing to stronger families.*

PRE-LOGGEMENT MEETINGS

Prior to preparing and submitting the subject application a pre-lodgement meeting took place along with subsequent email communications.

Meeting at the City 24 November 2021. As follows:-

- Location identified as generally compliant with the specified criteria in *Local Planning Policy 1.12 Child Care Premise and Family Day Care* (corner location not met).
- Amount of parking proposed identified as compliant;
- Consultation to take place;
- Acoustic and traffic reporting required (including a TIS by a suitably qualified traffic consultant);
- With concern expressed in relation to the presence of parking across the front setback.

In relation to the final point above:-

- The limitations affecting the layout of the child care premises were discussed;
- With the case put, that parking at the front would be less intrusive where adjoining properties are concerned.

Following the meeting, three (3) additional plans were prepared, each seeking to deliver an appropriate outcome with parking across the front of the property. In response, however, the City's position remained generally consistent. That is, parking should endeavour to be provided behind the front setback line (this position based on recent practice).

Accordingly, a concerted effort has been made to further explore the positioning of parking on-site as recommended. The Site Plan proposed has parking aligned to the southern boundary, with all bays behind the front setback line (and largely screened from public view).

SUBJECT SITE, LOCATION AND SETTING

The land subject of this application is described as Strata Plan 1813 consisting of four (4) lots with the following Certificate of Title Folio and Volume numbers:- 1352/40 (Lot 1), 1352/41 (Lot2), 1352/42 (Lot 3) and 1352/3 (Lot 4). At present the land is occupied by four (4) grouped dwellings.

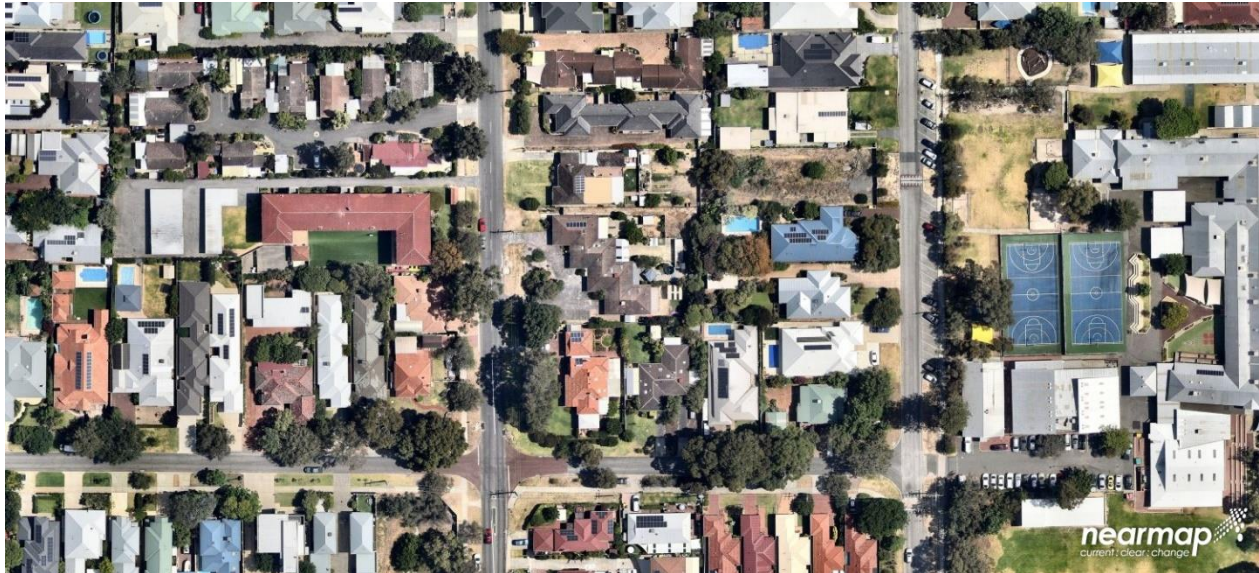
Positioned on the east side of Point Walter Road, the property is one-in (north) from the corner of View Terrace.

The site is flanked to the south by a single house on the corner of Point Walter Road and View Terrace, another house fronting View Terrace, two (2) dwellings to the rear fronting Foss Street, and a single residence to the north.

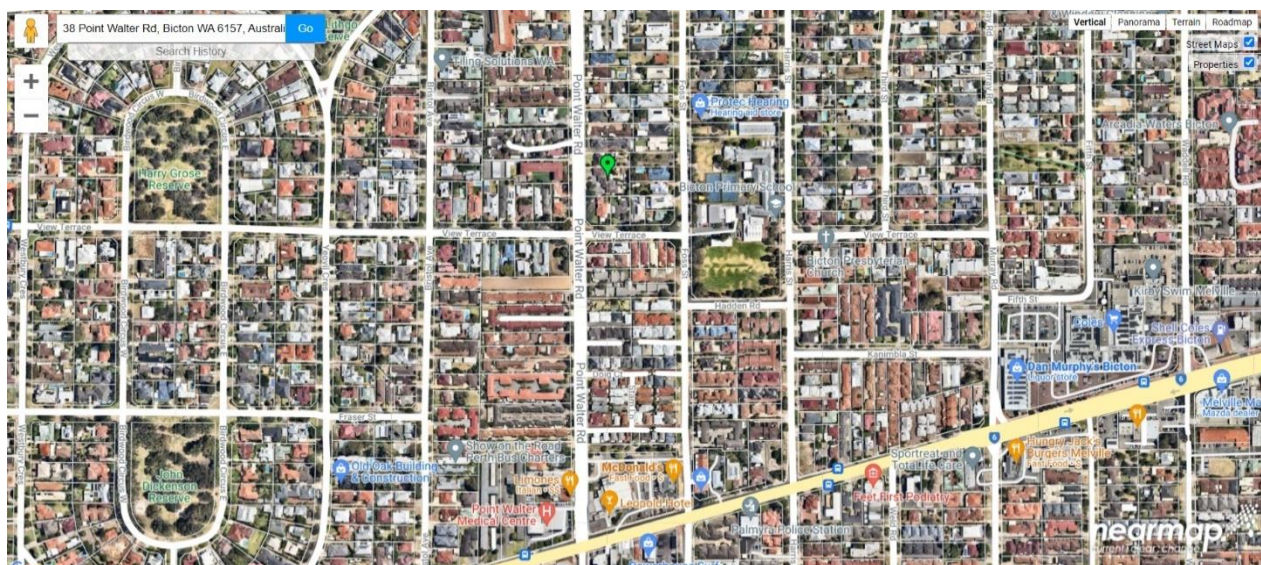
The immediate locality is characterised by a genuine mix of single houses, grouped and multiple dwellings. Immediately adjacent, on the west side of Point Walter Road, is a three (3) storey block of late 1960's flats.

The broader locality contains Bicton Primary School between Foss and Harris Streets and is characterised by the commercial precinct centred around the intersection of Point Walter Road and Canning Highway, Melville Plaza and Melville Recreation Centre.

The location is both walkable and well served by public transport. Transperth bus services are available on Canning Highway and Preston Point Road (two (2) services on each), the details regarding such contained in the Traffic Impact Statement (TIS) prepared by Riley Consulting.



SUBJECT LAND IN THE IMMEDIATE CONTEXT (SOURCE: NEARMAPS)



SUBJECT LAND IN THE BROADER CONTEXT (SOURCE: NEARMAPS)

The proposed child care premises will complement the primary school in the area, adding to this education establishment and other services used by the local community.

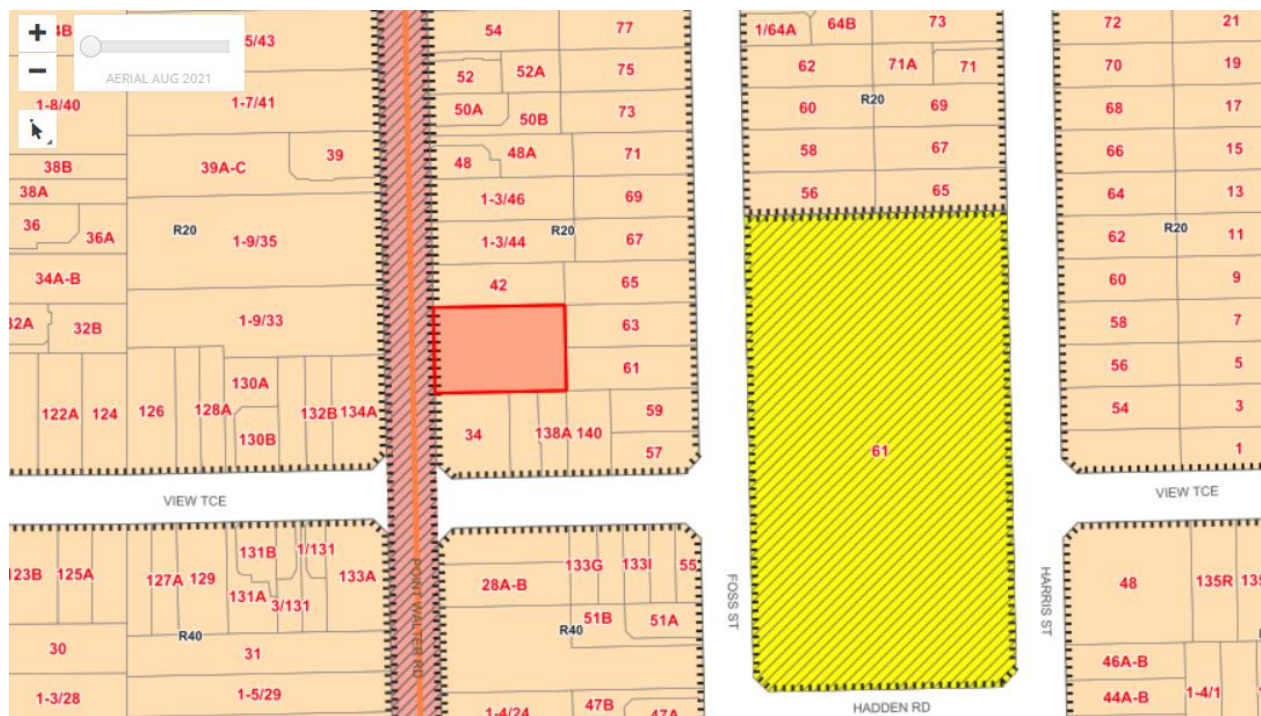
PLANNING FRAMEWORK

Metropolitan Region Scheme

The land is zoned 'Urban' under the *Metropolitan Region Scheme*.

City of Melville Local Planning Scheme No.6

The land is zoned 'Residential' under the City of Melville's *Local Planning Scheme No.6 (LPS6)* with an R20 coding. Point Walter Road is Local Distributor under the City's Road Hierarchy, with Bicton Primary School on land zoned Public Purpose for Education.



SUBJECT LAND, POINT WALTER ROAD (LOCAL DISTRIBUTOR) AND BICTON PRIMARY SCHOOL SOURCE: CITY OF MEVILLE INTRAMAPS)

In Table 3 of LPS6 (Zoning Table), a child care premises is listed as a A₁ use with the descriptor at the bottom of the Table stating ... *the development (including use) may be subject to a specific Scheme provision and/or policy, which may impose restrictions with reference to site suitability criteria, positioning on site or the amount or proportion of land or floorspace allocated to the particular use.*

City of Melville Local Planning Policy 1.12 Child Care Premise and Family Day Care (LPP1.12)

LPP1.12 is the City's specific policy dealing with child care premises. In LPP1.12, reference is made to the R-Codes where design and builtform are concerned along with local planning policies. The Policies referred to are Local Planning Policy 1.6 (LPP1.6) dealing with *Car Parking* and Local Planning Policy 2.2 (LPP2.2) dealing with *Outdoor Advertising and Signage*.

Reference in LPP1.12 is also made to the WAPC's *Planning Bulletin 72/2009* dealing with Child Care Centres.

The A use in Table 3 classification *means that the use is not permitted unless the local government has exercised its discretion by granting development approval after giving special notice in accordance with clause 64 of the deemed provisions (advertising).*

PROPOSAL

The proposal is for the use and development of the land for the following: -

- A child care premises;
- The erection of a building for use as the child care premises, positioned centrally on the land. The building will have a gross floor area of 515m² and will comprise the following:-
 - A reception, office and staff room, laundry and kitchen/laundry across the south-western corner of the building;
 - Five (5) child care rooms with associated storage space, shared amenities and wash rooms;
 - One (1) cot room;
- Two (2) outdoor play areas, positioned between the building and Point Walter Road, and the building and the rear boundary (totalling 585m² in size);
- Vehicular access and egress via one (1) cross-over connecting with Point Walter Road; and
- The establishment of a car park on the southern side of the land, to contain 16 parking bays (including one (1) disabled bay).

The premises will provide care for up to 83 children, with hours of operation between 6:30am and 6:30pm Monday to Friday. The maximum number of staff on-site at any one time will be 15.

PLANNING SUPPORT

City of Melville Local Planning Scheme No.6

Land Use

The child care use is considered appropriate for the land and in the context for three main reasons: -

- The site is well suited. A child care premises can successfully exist on the subject land with minimal, if any impact on adjoining properties;
- The location is well suited. Child care premises are a much needed local service. The premises can establish on the subject land without impact on the broader location,

particularly in terms of amenity and traffic movement. The child care premises will also be conveniently positioned to the local primary school; and

- The site, use and design of the proposed child care premises will provide a positive setting for the care and development of young children. The care spaces (internal and external) will provide an open setting and a positive environment within which child care and growth can take place.

Scheme Aims

The City's LPS6 aims ... *to maintain and improve the quality of life and services for the residents and ratepayers of the City of Melville.* The subject proposal will contribute to addressing the shortage of child care places in Bicton, improving the quality of life for residents (families and carers) in need of the service.

Where the specific aims of LPS6 are concerned, the proposal meets and/or addresses the objectives that are relevant.

With respect to the City's specific aims for 'Community', the child care premises will assist:-

- *to ensure the community has access to an adequate range of services and facilities to meet their needs;*
- *to ensure development promotes a sense of community and encourages participation in community life;*
- *to ensure all development complements and contributes to the communities desired identity and character for Melville.*

The aims above reinforce the importance of child care premises as a fundamental community use.

Scheme Zone Objectives

The City's LPS6 objectives for the Residential Zone are listed in the Table below.

Each objective (save the first point) is provided with an accompanying comment, these confirming the proposal serves to meet the City's stated objectives.

Residential Zone Objective	Comment
<ul style="list-style-type: none"> • <i>To provide for a range of housing and a choice of residential densities to meet the needs of the community.</i> 	<ul style="list-style-type: none"> • Noted.

<ul style="list-style-type: none"> • <i>To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.</i> • <i>To provide for a range of non-residential uses, which are compatible with and complementary to residential development to promote sustainable residential development.</i> • <i>To maintain the compatibility with the general streetscape, for all new buildings in terms of scale, height, style, materials, street alignment and design of facades.</i> 	<ul style="list-style-type: none"> • The project design is well considered providing for a high-quality development. Complementing the design, the built form (construction) will be executed to a high standard. When complete, the child care premises will sit appropriately in the local residential streetscape. • By virtue of their use classification, child care premises are recognised as being generally acceptable in residential areas. This principle is supported in WAPC <i>Planning Bulletin 72/2009</i> dealing with Child Care Centres. • The subject proposal has been designed to appear compatible in the streetscape in all respects. Additionally, as required by the City's Planning team, car parking will not be positioned across the front setback area.
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In addition to the design being compatible with the context, the project will be landscaped to a high standard. Amelia Coleman from Urban Retreat has prepared a site and location specific landscape plan for the project, this including the retention of the large tree on the south-western corner of the property.

For the purpose of ensuring the landscaping proposed is acceptable, Amelia has worked closely with the City's Parks team. In a letter received from the City's Arboricultural Supervisor dated 14 February, the City agrees to the planting of three (3) WA Weeping Peppermints across the verge in front of 38 Point Walter Road.

City of Melville *Local Planning Policy 1.12 Child Care Premise and Family Day Care (LPP1.12)*

The subject proposal is generally compliant with the City's Policy.

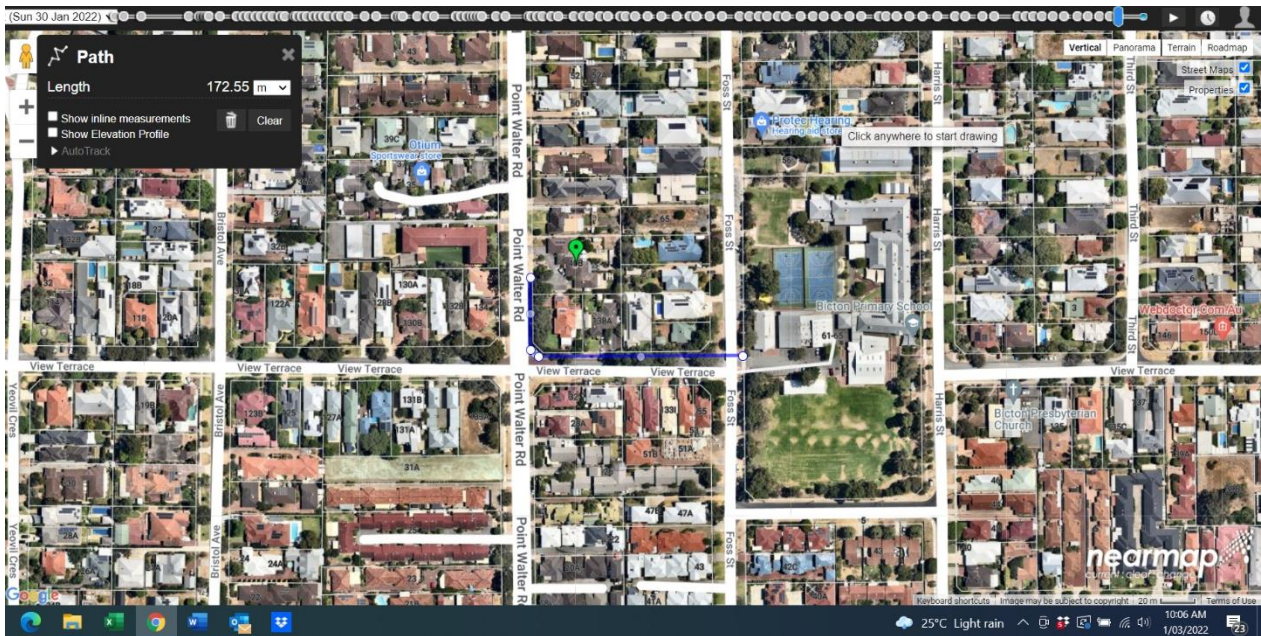
Location

LPP1.12 lists five (5) criteria that inform what is a preferred site when looking to develop a child care premises in the City of Melville. Apart from the subject land being one-in from the corner of View Terrace, 38 Point Walter Road meets the criteria.

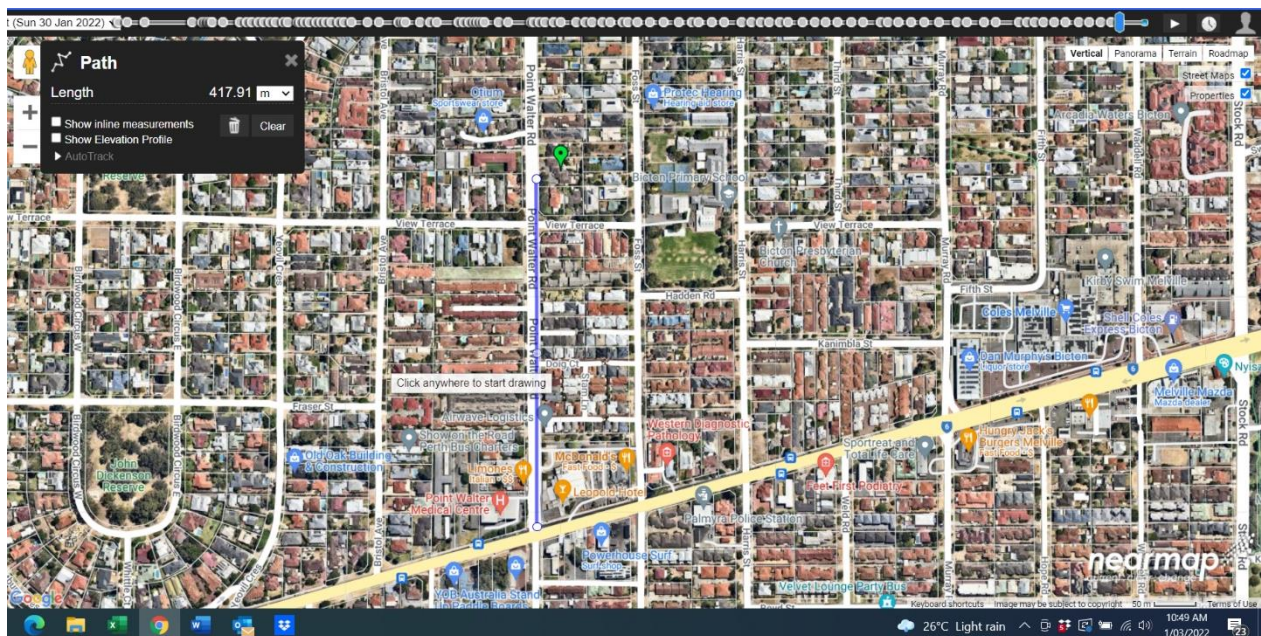
LPP1.12's criteria are listed in the Table below.

LPP1.12 Criteria	Comment
<i>Within a walkable catchment, of activity centres, workplaces, schools, community facilities, public open space and civic facilities.</i>	A walkable catchment is identified as a 400-800m distance amounting to a 5-10 minute walk. Where there is a genuine nexus to be enjoyed with like land uses, the subject proposal is approximately 175m from Bicton Primary School. Beyond this, the site is 400m from the Local Centre on the corner of Canning Highway and Point Walter Road and 675m from Melville Plaza.
<i>Well served by footpaths, dual access paths and public transport.</i>	The location is well served by footpaths and public transport (see Riley Consulting TIS).
<i>Of adequate size to provide suitable areas of play space (both indoor and outdoor) and parking.</i>	The site is adequate in size (1,853m ²), providing for a <u>single</u> storey development with compliant indoor and outdoor play spaces. Compliant car parking is also proposed, in the location preferred by the City's Planning team (<u>not within the front setback area</u>). With respect to lot size, the WAPC's Planning Bulletin refers to 1,000m ² (and regular in shape). The larger lot size, despite being difficult to secure, provides for a viable development. <u>Most importantly, this submission demonstrates the proposed child care premises can co-exist successfully in the area with minimal if any impact on functionality and amenity. Furthermore, it will create a safe environment for children and families using the premises.</u>
<i>Located on Local Distributor and District Distributor Roads.</i>	With respect to the final point above, the child care premises will be positioned on a Local Distributor road. In this regard, the City's Policy has recently been amended by Council to identify Primary Distributor Roads (Canning and Leach Highways, and South Street) as undesirable for child care premises <i>in order to minimise the potential for harmful traffic fumes, excessive noise levels and road safety risks impacting on the health of children, staff and</i>

visitors to the child care centre and surrounding road users. For these reasons, 38 Point Walter Road represents a good site and location for a child care premises, enabling a good design and positive setting for the care and development of young children.



CHILD CARE PREMISES TO BE 175M FROM BICTON PRIMARY SCHOOL (SOURCE: NEARMAPS)



CHILD CARE PREMISES TO BE 400M FROM LOCAL CENTRE AND CANNING HIGHWAY

Siting and Design

LPP1.12 states that *Where a Child Care Premises is proposed within a Residential zone, the design and resultant built form will be assessed against the relevant provisions of LPS6, the RCodes (for open space, setbacks, visual privacy and overshadowing) and local planning policies. This will ensure such development is compatible with the residential character of the area.*

LPP1.12's criteria are listed in the Table below.

R-Code Provision	Comment
Open Space (50% required)	Compliant – 72.2% proposed.
Setbacks Street – 6.0m required South side – 1.5m required East side – 1.5m required North side- 1.0m and 1.5m required	Compliant. 10.0m proposed (compliant). 12.7m (compliant). 18.13m (compliant). 1.0-1.5m (compliant).
Visual Privacy	Non-issue (single storey child care premises).
Overshadowing	Non-issue (child care premises set off south side boundary 12.7m).

As referred to in the City's Policy, assessment (or compliance more accurately) will ensure such development is compatible with the residential character of the area.

Where fencing is proposed around the front setback, this will also be compliant with the R-Codes (visually permeable above 1.2m).

Noise and Amenity

An acoustic assessment and report has been undertaken and provided by Herring Storer in accordance with the requirements of LPP1.12.

The SUMMARY states ... *noise emissions from the proposed development, would be deemed to comply with the requirements of the Environmental Protection (Noise) Regulations 1997 for the proposed hours of operation, with the inclusion of the following:*

1. *Although the proposed facility would open before 7 am (ie during the night period), the outdoor play area would not be used until after 7am. Thus, noise received at the neighbouring existing residences from the outdoor play area needs to comply with the assigned day period noise level.*
2. *Fencing to the development to be as shown in Figure 5.2 in Section 5 - Modelling.*

3. *It is recommended that the air conditioning condensing units are located as shown on Figure 5.1 in Section 5 – Modelling; and they are installed with “night” period quiet modes. Additionally, it is recommended that an assessment of the mechanical services design be undertaken to ensure compliance with the regulations.*

With respect to point 1, children will remain internal to the building prior to 7am.

With respect to point 2, the application plans and elevations have been amended to reflect the findings of the acoustic assessment and report.

With respect to point 3, the matter referenced is standard to the extent a condition on approval would deal with such, both in the obtaining of a Building Permit and when the premises is operational.

Landscaping

As mentioned above, a detailed landscape plan has been prepared and submitted with the development application. The plan complements the use and proposed development, ensuring it sits appropriately in the locality. Importantly, the plan provides for the retention of the iconic tree (photographs below) positioned across the south-western corner of the property (adjacent to Point Walter Road).



Car Parking and Traffic Generation (to be read in conjunction with the Riley Consulting TIS)

LPP1.12 requires car parking to be provided in accordance with *Local Planning Policy LPP1.6 Car Parking and Access (LPP1.6)*. For child care premises, LPP1.6 requires *One bay per 10 children, plus 0.5 bays per staff member, and drop-off and pick-up area to the satisfaction of the Council.*

Based on the numbers proposed, 15.8 bays are required with 16 proposed. As required, all vehicles will be able to enter and exit the site in a forward gear.

For more information regarding parking and access, refer to the TIS prepared by Riley Consulting. The Executive Summary in the TIS supports the proposed development.

Note: car stackers and/or tandem parking arrangements not proposed.

Hours of Operation

The proposed hours of operation are 6.30am to 6.30pm Monday to Friday.

Whilst the overall time is the same as that provided for by LPP1.12 (12 hours), the earlier opening time caters to the flexible working arrangements that now characterise the Australian workplace.

Different workplaces offer different arrangements, these providing for a wide range of flexibility around start and finish times. Other flexible working arrangements include:- part time work; casual work, job sharing and compressed hours. Flexible rostering is also more common along with working from home, an increasingly relevant alternative to the work place.

Based on the above, the City's support is sought for the hours of operation proposed.

Signage

Signage is proposed on the street and south side elevations. The amount of signage proposed is limited, recognising of the residential location. It is also proposed to appear integral to the building design and to this end will not be intrusive in the locality; the signage proposed is representative of what is proposed but indicative in terms of content. There are no objections, therefore, to a condition requiring application for such being imposed on approval.

CONCLUSION

At the time of first contact, the City was informed of the undersupply of child care places in Bicton. Following this, various site plans were prepared for the purpose of advancing to a development application worthy of support from a planning perspective.

Child care and choice in child care makes a significant contribution to the welfare of the local community. It is acknowledged as being important in the early education of children, serving to support the health, education and social well-being of children and families alike.
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As stated in the *Local Government and Early Years Network* report ...

Local Government is the closest sphere of government to the community and therefore has enormous potential to influence a community that values and supports children in the early years and their families.

Local Governments play an essential role across a range of areas that can improve the health and wellbeing of young children including Early Childhood Education and Care services; being the largest provider of venues for parent-led playgroups; supported playgroups; children's health and safety; children's recreation and public spaces; library services and planning.

Where previously child care was primarily the responsibility of government, including Local Government, the service is now (for the most part) delivered by the private sector. The shift from public to private took place in the 90's, responding to Policy at the time. Notwithstanding the shift in service delivery, Local Government continues to play an important role!

With respect to the subject proposal, the City of Melville's support is sought.

As reported in this submission, the child care proposal is generally compliant with the applicable planning framework.

The framework includes the City's *Local Planning Scheme No.6* where aims and objectives are concerned and the City's Local Planning Policy dealing with child care premises. Additionally, the requirements of the R-Codes have been considered (and met) whilst the amount of parking proposed is compliant with the City's Local Planning Policy dealing with parking and access.

In addition to the above, the application is supported by Riley Consulting (Traffic Engineer) in relation to traffic and Herring Storer (Acoustic Consultant) in relation to noise.

Accordingly, the City is respectfully asked to assess and recommend via an RAR the application be approved by the Metro Inner South JDAP.

In the event you have any questions or require further information, please contact me on 0400382445.

Yours sincerely
MW URBAN



Tony Watson