

SUBMISSION
NUMBER

13

Sharon Bennett

From: j_samson@clear.net.nz
Sent: Monday, 2 March 2009 12:38 a.m.
To: BUS: Policy Submission
Subject: Draft Early Childhood Centres Policy

The following details have been submitted from the Draft Early Childhood Centres Policy form on the www.Wellington.govt.nz website:

Title: Mrs
First Name: Justine
Last Name: Samson
Street Address: 42D Darlington Rd
Suburb: Miramar
City: Wellington 6022
Phone: 027 3090322
Email: j_samson@clear.net.nz

I would like to make an oral submission: Yes

I am making this submission as: Other

Submitting as - other: Convenor of Property Wellington Playcentre Association administering centres affected by this policy

Do you agree with the principles of fairness, affordability and sustainability that underpin these proposed changes: 3

Why: We agree that the policy appears to be fair but also would like it noted that there are statements that appear to contradict each other such as supporting current centres instead of new but not allowing development on Recreational or reserve land how is this to be achieved in conjunction with the increase in infill housing in residential areas of the city? The other issue is how these principles can be fulfilled in an environment that is set to increase the rentals to a level that could cause financial hardship to current centres and even risk of closure?

Do you agree with the proposed mechanism to determine rent for tenant childcare centres: 1

Why: No. We feel strongly that this means every rent review tenants will be required to "plead their case" and in organisations such as ours which is voluntary in ten years time that will mean a lot of time and energy spent explaining our position to yet a new council person. We feel this level should be set outside the lease as a permanent arrangement and that the building lease of %4 should say from %1 to %4 as previously negotiated.

We also take issue with the fact that gross MOE income is taken as arriving in a Centre as in fact as

previously explained to WCC our centres receive a percentage arrived at after the National Playcentre Federation and the Association have taken their levies to support the work of Playcentre in New Zealand and as such the centre does not have much power to change the levy. In the case of the National levy 521 centres in NZ set the levy and it is hard to get them to base this on the actions of the WCC for our 3 affected centres! We also feel strongly that as tenants of these centres we spend a lot of time and money maintaining a clean, risk free environment for our children and need to meet a high regulatory standard that ensures these centres are kept to often a much better standard than a lot of other premises owned and used by council and this rent review does not seem to take this into account. The net income received in these centres would seem a better way to set a fair ! rent.

Is there anything you feel has not been adequately covered by this draft policy: Schedule one clause 1 "In some cases a reduction may be possible after taking into account..."

Appears to mean %4 unless very unusual circumstances not as some have suggested able to negotiate.

Why has it been put in that if the WCC wish to change current leases the Tenant will be required to pay the cost of this. As the organisation wishing to change them to the detriment of the Lessee then surely the WCC should pay the costs associated of doing so!

Clause 3 what sort of asset investment will be taken into consideration.

We feel strongly it should clearly state what financial reporting is needed as many Charitable organisations have a review of their accounts done now not an audit as this has become cost prohibitive in recent years will these be recognised by WCC?

What do you consider to be the positive aspects of the draft policy: The WCC will after nearly five years in some cases sign leases on some of our centres, as tenants this lack of lease has seriously affected our centres access to grants and therefore projects for our children!

Do you wish to make any further comments on the draft Early Childhood Centres Policy: We feel strongly the WCC has looked at the receiving of Central Government money as a cash figure and not looked at how it spent in centres and the high overheads associated in meeting the regulatory requirements and providing quality ECE in Wellington. The MOE has a formula to fund ECE and the amount given for buildings is a very small part of the funding and from this the WCC requires centres to also maintain the internal and ground environments and this also takes money from those funds. We are a non-profit organisation encouraging Wellington families-whanau to learn and grow with their children in an ECE environment and long term we are the future of the WCC and hope they will help us to achieve this in the future



Sharon Bennett

From: helenb.wccca@xtra.co.nz
Sent: Friday, 27 February 2009 3:28 p.m.
To: BUS: Policy Submission
Subject: Draft Early Childhood Centres Policy

The following details have been submitted from the Draft Early Childhood Centres Policy form on the www.Wellington.govt.nz website:

Title: Ms
First Name: Helen
Last Name: Baxter
Street Address: 130 Adelaide Road
Suburb: Newtown
City: Wellington
Phone: 04 389 3383
Email: helenb.wccca@xtra.co.nz

I would like to make an oral submission: Yes

I am making this submission as: Other

Submitting as - other: Wellington Community Childcare Association - Umbrella organisation for tenant childcare centres

Do you agree with the principles of fairness, affordability and sustainability that underpin these proposed changes: 1

Why: Families in all communities in Wellington should have the same/equitable access to affordable good quality early childhood education.

Do you agree with the proposed mechanism to determine rent for tenant childcare centres: 2

Why: WCCCA supports the concept of rental rates being based on ability to pay - that is, linked to annual income but we have some concerns that the mechanism may be too simplistic. We want to see each centre having the opportunity to put its case to Council and have individual circumstances considered.

Is there anything you feel has not been adequately covered by this draft policy: 1. What has not been adequately covered

■ The rental determination mechanism needs further clarification.

We support the Councils undertaking to recognize particular circumstances when setting the rental

rate for each individual centre, This is essential to ensure the equitable application of this policy. The draft policy wording on this however, is very broad, and provides no guarantees. Some centres on Council land and/or buildings have made substantial improvements to the premises over the years, using fundraising or surplus funds accumulated from parent fees and other income. Others share the premises with other groups, or relinquish access during certain times in the day or the week or during holiday periods, to allow public use. All these individual circumstances need to be taken into account when negotiating a suitable rental..

Also, it is not completely clear what will be included in the "income" figure to be used to assess the rental rate. Some centres carry out substantial fundraising activities to increase their income and enable purchase of equipment and supplies that the centre would not otherwise have been able to afford. Centres can receive support grants from the Ministry paid out with each 4 monthly bulk funding payment for supporting unregistered teachers to become registered. Centres also receive subsidies from Work and Income for the attendance of children from families on low incomes. Some centres also invest Ministry of Education bulk grant funds (which are paid out in lump sums every 4 months) wisely and increase the centres income through interest payments.

Also, bulk grant payments from the Ministry can vary from payment to payment due to a number of issues, e.g. numbers of children enrolled, numbers of qualified and registered teachers employed.. Will centres pay a different rental rate for different years depending on the income bracket they fall in that year?

■ WCCCA is also concerned about the proposal relating to responsibility for maintenance of the buildings and grounds.

If centres are to be responsible for covering the costs of the maintenance of the interior of the buildings, e.g. plumbing and electricity, then the value of being charged less than market rental rates may be negated. We believe that the Council needs to operate as the landlord of these properties, and hence be responsible for all building and grounds maintenance.

We can accept that the services may be responsible for specific early childhood centre Regulations compliance, it would seem sensible for the Council to consult the service if it was undertaking maintenance work, to ensure that the work will meet both Council AND early childhood regulations standards, e.g. replacement of a fence or upgrading toilet facilities.

What do you consider to be the positive aspects of the draft policy: 2. Positive aspects

■ Some centres that have not had formal lease agreements in the past will welcome clarification of the commitments and obligations of both the Council and the centre management.

■ That the policy aims to develop a more equitable approach to the lease arrangements with early childhood services in the city, and that Council is willing to consider the individual circumstances of each centre to achieve this equity.

■ That any increased rental rates that are to be paid by centres will be phased in over 3 years. This allows centres to plan ahead.

■ That the Council recognizes that it has a role in ensuring there are affordable quality early childhood facilities in the city.

■ That Council recognizes the importance of developing a partnership approach to the provision of early childhood services in the city, involving relevant agencies and including the Ministry of Education.

■ WCCCA also supports the stated Assessment Criteria for Council to assess requests for provision of land and/or building for early childhood education. (ie 4.1.)

Do you wish to make any further comments on the draft Early Childhood Centres Policy: 3. Any further comments

In recent years it has become more and more difficult to maintain and/or establish new early childhood services in areas of greatest demand. It is important that there are not-for-profit early childhood services in areas of the city where families work and live. Wellington has very few non-commercial sites that are suitable for this purpose. In particular we have a real concern about the provision of early childhood services in the inner city and the immediate surrounding suburbs, e.g. Mt Victoria, Kelburn, Brooklyn, Aro Valley and Mt. Cook. More and more families are wanting and needing to live close to the inner city to address fuel costs and parents working in the city want early childhood services that close at hand. Although there are central government funds allocated to assisting groups to establish new services in areas of need, much of this funding is siphoned into areas of the country in greater need, and is only available to groups that can find non-commercial land and buildings.

The draft policy indicates that the Council is aware of these problems and has a commitment to support groups that wish to retain or establish new services in the city area. We believe however that the Council needs to be more pro-active in assisting existing early childhood services to retain the use of current premises at an affordable cost, and that if they do need to find alternative premises for what ever reason, the Council takes an active role in assisting them to find premises on non-commercial land. The fact that this may need Council to review current land use needs to be confronted.

We agree that we need to develop a more intersectoral approach to solving this problem. One of the key approaches needs to be for local and central governments and relevant agencies and umbrella groups to work in collaboration.

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SUBMISSION
NUMBER



Sharon Bennett

From: Peter Lynch [peter.lynch@karori.net.nz]
Sent: Thursday, 26 February 2009 8:49 p.m.
To: BUS: Policy Submission
Cc: karori Childcare Centre
Subject: Draft Early Childhood Centres Policy Submission

Attachments: Attachment information; wcc_draft_ecc_policy_submission.pdf



Attachment wcc_draft_ecc_policy_submission.pdf (569 B)

Please find attached a submission from Karori Childcare Centre on Council's Draft Early Childhood Centres Policy.

Regards
Peter Lynch
Licensee
Karori Childcare Centre

Karori Childcare Centre
PO Box 17400
Karori
Wellington

26 February 2009

Strategy and Policy Committee
Wellington City Council
Wellington

Dear Committee Members

Submission on Draft Early Childhood Centres Policy

I am the licensee of Karori Childcare Centre which provides an early childhood education service to the Karori community. We are a parent-owned cooperative service located at 47 Beauchamp Street, which is a council-owned property. We wish to make the following points in regards to the council's Draft Early Childhood Centres Policy.

1. KCC has been providing services to the Karori community for more than 21 years. KCC has been operating from its current premises since December 2003. Prior to that time, it had been operating from premises on Karori Road, when the redevelopment of the Karori shopping area necessitated our relocation. At the time of our relocation, we were initially offered a two year lease on our new premises. This was felt by KCC staff and parents to be wholly unsustainable for the centre's long-term future, and subsequently the current 10+10 year lease was negotiated.

We would be concerned if the policy review were to result in a reduction in the length of the lease from its current level.

2. The development of 47 Beauchamp Street at the time of our relocation was partially funded by the centre's own contribution of \$50,000, as well as many hours of voluntary parent contributions and assistance. Since then, we have undertaken significant upgrade and maintenance work at the centre. In particular, we have seen to all of the maintenance of the property and the grounds, and have continued our capital investment in the property by way of re-carpeting and re-painting, the installation of heat pumps, and the relaying of the outdoor rubber matting.

We would be most appreciative if this contribution were taken into account when determining the new rent.

3. The centre receives funding from the Ministry of Education three times each year. Each funding allocation comprises funds for the upcoming four month period, plus a

“washup” payment reflecting the actual vs forecast funding over the previous four month period.

How would a negative "washup" be taken into account in determining the rent due to be paid by the centre?

4. Rent, being a small amount, is currently paid annually.

How will the payment of rent be made once the transition to market-based rents is commenced?

Overall, we feel that the draft policy is fair and even-handed in balancing the needs of community-based Early Childhood Centres, and the council's requirements. We would welcome the opportunity to make an oral submission to the Strategy and Policy Committee at a convenient time.

Yours sincerely

Peter Lynch
Licensee
Karori Childcare Centre