

**Supplementary Planning Policy Guidance  
Child Day Care Facilities  
Public Consultation  
September – December 2005**

**Response to Comments**

	Comment	Response
1	<p><b>Ms Catherine Polidano</b> - I feel that the draft guidelines regarding child day care facilities should be made available on-line through the MEPA website for free, during the public consultation period.</p>	<p>The document is indeed available for free from the MEPA website.</p>
2	<p><b>Ms Marisa Testa</b> – Saw advert on newspaper and interested to work with children and inquired about possible vacancies.</p>	<p>It was explained that advert was to publicize policy on child day care centres rather than about employing people. It was also suggested that the best way to find a job in this sector is to take one of the ETC courses.</p>
3	<p><b>Mr Alexis Borg</b> – Read article on newspaper, and asked for more information since he is working on an assignment for conversion nursing course and working on Intergenerational programs.</p>	<p>It was explained that MEPA is not the government agency responsible for Child Day Care policy, but has issued guidelines for the control of development of child care centres, supporting the guidelines issued for consultation last year by the Ministries for the Family and Education. It was suggested that the person contacts these Ministries.</p>
4	<p><b>Laurence Zrinzo</b> – Supplementary Planning Policy Guidance - Child Day Care Facilities (a) Draft for Public Consultation (September 2005) vis-à-vis (b) August 2004</p> <p><b>Location:</b> The necessity of child day care facilities in Residential Priority Areas is arguably necessary but only if: (a) there is the demographic need for it - child-minding facilities that cater for clients who do not reside in the vicinity necessarily incur an early start to a child's day as well as generate more traffic on main roads and the secondary roads near the facility (b) similar facilities are not present in the immediate neighbourhood - the cumulative effect of two such facilities close to each other cannot but result in traffic congestion, traffic fumes and noise, parking problems and the general perturbation of the peace and quiet that should be a <i>sine qua non</i> characteristic of a Residential Priority Area.</p>	<p>It is not clear which August 2004 document is being referred to since MEPA released the Child Day Care SPG for public consultation only once, in September 2005.</p> <p>MEPA will reconsider its policy with respect to Residential Priority Areas, and the Guidance Note will be amended to prohibit the development of Child Day Care Facilities in Residential Priority Areas (however the proposal to raise the maximum number of children acceptable in the context of home-based child care to six children remains, and such home-based activity will be acceptable all over Malta, including in Residential Priority Areas).</p>
5	<p><b>Laurence Zrinzo</b> - <b>The suitability of the premises:</b> (In the Draft for Public Consultation (September 2005) (a) No space-area is postulated for each child (b) Safety measures such as the number of steps and the use of a basement - both hampering "the free movement of children and adults in an emergency" - are not mentioned. However, one would hope that these factors are embodied in the clause "be accessible for all".</p>	<p>The issues of space standards per child, child safety, lighting and ventilation are aspects of the premises that, as noted in point (d), will be covered in the policy guidance prepared by the Ministry for the Family and Social Solidarity and enforced by the Department of Social Welfare Standards. Indeed, the aim of having no overlaps between the two policy documents was to avoid having two incompatible standards relating to the same concerns.</p>

	<p>(c) Health measures such as the fact that the premises “be naturally well lit and well ventilated” are also not mentioned. These factors are as important as “air quality” in the vicinity of heavy traffic flow, a subject extensively dealt with by the International Study of Asthma and Allergies in Children. When all such factors are not considered, instead of preventing disease, one is generating disease in our youngsters with consequent spiraling of health costs.</p> <p>(d) Finally, that the suitability of the premises will primarily be assessed by the DSWS, with “the above policies ... related to planning issues only” is somewhat disturbing in that there may result two standards and two measures should the DSWS not use promulgated standards.</p>	
6	<p><b>Ministry for the Family and Social Solidarity/Department of Social Welfare Standards</b> – Although section 1.7 has been removed in the public consultation draft, there are still two other sections which make reference to the Equal Opportunities (Persons with Disability) Act - section 3.8 and 4 b (vi). These should also be removed.</p>	<p>It is considered that it is sufficient to remove the requirement for the KNPD (National Commission for Persons with a Disability). The note that premises should be in conformity with the Equal Opportunities (Persons with Disability) Act can remain.</p>
7	<p><b>Ministry for the Family and Social Solidarity/Department of Social Welfare Standards</b> - Regarding section 4 b) v (not to be situated in a block of flats) we are suggesting that the definition of "flats" - that of having a common entrance - be included as a footnote.</p>	<p>It is proposed to include the definition of a flat from the Building Levy Regulations (LN 6 of 1993), as follows:</p> <p>“flat’ means a single family dwelling unit occupying the whole or part of one floor of a building which contains several similar units none of which has its own separate entrance from the street but share a common access therefrom.’</p> <p>From Building Levy Rate Regulations (LN 6 of 1993) under the Development Planning Act, 1992 (Act 1 of 1992).</p>