

Written Presentation to ABF P21/3937 Review of Local Planning Policy 1.12 Child Care Premise and Family Day Care.

ABF date: 10 August 2021.

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Presentation Content: Environmental Safety of Children is Compromised by Excessive Air Pollution and Noise.

Detailed Content:

Environmental safety of children is compromised by excessive traffic noise and air pollution.

Recent studies have highlighted the harmful effects upon children from particulate matter and ultra-fine particulates, which can enter the blood stream. Lung, cardiovascular, and brain impairment are effects of air pollution. Autism and dementia have been implicated in the research.

The children are our future. They should be able to develop to the maximum of their potential, both physically and intellectually.

Main Roads has advised the use of 2.8 percent per annum increase in traffic count to 2041. Using this increase for Leach Highway near Stock Road, for example, a current traffic count of 40,000 vehicles per day (vpd) would increase by 78 percent by 2041, to 71,000 vpd.

Currently, Solid barrier noise walls, up to 8 metres high, are being constructed on High Street, Fremantle, which is the extension of Leach Highway, alongside the road in the vicinity of housing. Presumably similar walls would be appropriate with childcare centres on High Street and Leach Highway.

Childcare centres are a “sensitive land use” as acknowledged by WAPC and EPA. A proliferation of sensitive land use developments such as childcare centres are of concern to Main Roads and Department of Transport as they will undermine the long-term viability of Primary Distributors for their prime purpose of transport.

Children in Childcare are aged 0-5 years of age. Their lungs and brains are developing, and such development must be protected from excessive noise and air pollution. We know there is no safe level of air pollution.

California, seemingly best practice, requires a 150 metre buffer between schools and heavily trafficked roads, and has anti-idling laws such is their concern with emissions and air pollution. There is considerable research on this issue, and it would be an abdication of duty of care to disregard such protective action because planners have no specific air quality measures. Major signalised intersections, such as Stock Road and Leach Highway are pollution “Hot Spots” due to queued and idling vehicles awaiting a green light. The attached photo below shows a 200 metre long queue of idling vehicles on Leach Highway near Stock Road.

EPA advises that “emission of fine particles may be associated with vehicle emissions and any activities which may generate dust. This form of air pollution is particularly relevant when located in close proximity to residential and other sensitive land uses.” Also “Where there is an absence of a recognised standard or criteria to determine likely risk to human health, there may be the need to develop

standards based upon the available information and knowledge and, where appropriate, consultation with technical experts.”

Given the foregoing experts concerns, Leach Highway, South Street, and Canning Highway Primary Distributors are clearly not suitable locations for Childcare Centres, and LPP 1.12 ought to reflect this. Officers suggested new clause 3.1(f) suggesting Primary Distributor roads Leach Highway, Canning Highway, and South Street are preferred locations for Childcare Centres. I think Elected Members should reject this notion on health and safety grounds, for reasons outlined above.

Cr Pazolli’s amendment excising Primary Distributors from the Policy was previously passed by Council, and it is sound health and safety practice to protect the children from noise, air pollution, and other traffic related safety issues. Cr Pazolli’s amendment should prevail with this review.

An additional consideration, particularly when locating Childcare Centres on corner sites, relates to “ensuring Safe Stopping Distance sightlines from traffic to busy Childcare driveways.” This is an aspect of RAR’s that is often overlooked, including by the decision maker, and is worthy of reinforcement in the Policy as new clause 7.4 to help avoid this frequent decision maker blindspot.

Max FitzGibbon

Below: 200 metres of idling traffic on Leach Highway awaiting a green light at Stock Road, July 2021.

