



Metro West Joint Development Assessment Panel Agenda

Meeting Date and Time: 5 February 2020, 9:00 AM
Meeting Number: MWJDAP/258
Meeting Venue: Town of Claremont Council Chambers
308 Stirling Highway
Claremont

Attendance

DAP Members

Ms Francesa Lefante (Presiding Member)
Mr Jarrod Ross (Deputy Presiding Member)
Mr Jason Hick (Specialist Member)
Cr Bruce Haynes (Local Government Member, Town of Claremont)

Officers in attendance

Ms Lisa Previti (Town of Claremont)

Minute Secretary

Ms Debbie Hill (Town of Claremont)
Mr Marty Symmons (Town of Claremont)

Applicants and Submitters

Mr Nathan Stewart (Rowe Group)
Mr Sean Fairfoul (Rowe Group)
Mr Behnam Bordbar (Transcore)
Mr Robin White (Transcore)
Mr Gianni da Rui (Meyer Shircore)
Mr Aaron Caratti (Sharon Property Pty Ltd)
Mr Nathan Caratti (Kenby Property Pty Ltd)
Mr Tim Reynolds (Herring Storer Acoustics)
Mr Bob Hindle (The Atlantis Group)
Ms Jane Muirsmith
Mr Zane Randell
Mr Chris Mellor
Mr Julien Flack

Members of the Public / Media

Nil



1. Declaration of Opening

The Presiding Member declares the meeting open and acknowledges the traditional owners and pay respects to Elders past and present of the land on which the meeting is being held.

2. Apologies

Nil

3. Members on Leave of Absence

Nil

4. Noting of Minutes

Signed minutes of previous meetings are available on the [DAP website](#).

5. Declarations of Due Consideration

Any member who is not familiar with the substance of any report or other information provided for consideration at the DAP meeting must declare that fact before the meeting considers the matter.

6. Disclosure of Interests

Nil

7. Deputations and Presentations

- 7.1** Ms Jane Muirsmith presenting against the application at Item 10.1. The presentation will address road safety concerns.
- 7.2** Mr Zane Randell presenting against the application at Item 10.1. The presentation will address safety and noise concerns.
- 7.3** Mr Julie Flack presenting against the application at Item 10.1. The presentation will address breaches of the Australian Standard Car Parking Standards AS2890.1.
- 7.4** Mr Chris Mellor (Mellor Architects) presenting against the application at Item 10.1. The presentation will address traffic and safety concerns.
- 7.5** Mr Marty Symmons (Town of Claremont) presenting against the application at Item 10.1. The presentation will address traffic concerns.
- 7.6** Mr Gianni da Rui (Meyer Shircore) presenting in support of the application at Item 10.1. The presentation will address architectural matters.
- 7.7** Mr Behnam Bordbar (Transcore) presenting in support the application at Item 10.1. The presentation will address traffic matters.



- 7.8** Mr Sean Fairfoul (Rowe Group) presenting in support of the application at Item 10.1. The presentation will address support of the Application and against the Officer Recommendation contained in the Town of Claremont.

The Town of Claremont may be provided with the opportunity to respond to questions of the panel, as invited by the Presiding Member.

8. Form 1 – Responsible Authority Reports – DAP Applications

Nil

9. Form 2 – Responsible Authority Reports – Amending or cancelling DAP development approval

Nil

10. Appeals to the State Administrative Tribunal

- 10.1** Property Location: Lots 18-19 (162-164) Alfred Road, Claremont
Development Description: Child Care Centre
Applicant: Sharon Property Pty Ltd C/- Rowe Group
Owner: Sharon Property Pty Ltd Nathan Caratti, Kenby Property Pty Ltd Aaron Caratti
Responsible Authority: Town of Claremont
DAP File No: DAP/19/01600

Current Applications		
LG Name	Property Location	Application Description
Town of Cambridge	Lot 2 (130) and Lot 3 (132) Brookdale Street, Floreat	Child Care Centre
Town of Claremont	Lots 18 (164) and 19 (162) Alfred Road, Swanbourne	Proposed Childcare Centre

11. General Business / Meeting Closure

In accordance with Section 7.3 of the DAP Standing Orders 2017 only the Presiding Member may publicly comment on the operations or determinations of a DAP and other DAP members should not be approached to make comment.



State Administrative Tribunal Reconsideration

Responsible Authority Report

(Regulation 12)

Property Location:	Lots 18-19 (162-164) Alfred Road, Claremont
Development Description:	Child Care Centre
DAP Name:	Metro West JDAP
Applicant:	Rowe Group
Owner:	Sharon Property Pty Ltd.
Value of Development:	\$2.1 million
LG Reference:	DA2019.00047
Responsible Authority:	Town of Claremont
Authorising Officer:	David Vinicombe, Director Planning and Development Lisa Previti, Manager Statutory Planning and Building
DAP No:	DAP/19/01600
Report Date:	18 December 2019
Application Received Date:	12 April 2019
Application Process Days:	251 working days
Attachment(s):	1. Previous JDAP Determination 2. Location Plan, Submission Plan and Photo 3. Plans revised November 2019 4. Applicant additional information 5. Transport Report 6. Acoustic Report Environmental 7. Acoustic Report Ingress 8. Noise Management and Child Supervision Policy 9. Submission Table 10. Submissions Full Copies 11. Required Road Modifications 12. Extract Council Agenda 17 December 2019

Officer Recommendation:

That the Metro West Joint Development Assessment Panel, pursuant to section 31 of the *State Administrative Tribunal Act 2004* in respect of SAT application DR 161 of 2019, resolves to:

Reconsider its decision dated 12 July 2019 and **refuse** DAP Application reference DAP/19/01600 and accompanying amended plans Attachment 3 in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015* and the provisions of Part V of the Town of Claremont Local Planning Scheme No.3, for the following reasons:

Reasons

1. The proposed Child Care Centre is inconsistent with Town of Claremont Local Planning Scheme No. 3 with respect to:
 - a. Day Care Centre is an 'SA' use within Table 1 – Land Use Table. It is considered the proposal will have a significant detrimental impact on the existing quiet residential amenity of residents in the locality by way of increased traffic volumes and safety, on street parking and visual amenity. Accordingly the land use is not considered to be an appropriate land use within the 'Residential' zone.
 - b. Clause 46(3) which requires *"the continuation of the domestic scale and architectural character of the area..."* It is considered the bulk of the building and the excessive area of hardstand for parking is not fully in keeping with the residential character of the area
2. The proposed Child Care Centre is inconsistent with Town of Claremont Local Planning Policy 206 – Child Care Centres with respect to:
 - a. Location requirements as:
 - i. The proposal is not contained within a preferred zone, nor immediately adjacent to a preferred zone.
 - ii. The proposal does not adjoin a compatible land use and the traffic increase has not been demonstrated to be suitable from an engineering view.
 - iii. The site is not of sufficient size to accommodate the development without impacting on the amenity of the surrounding area.
 - iv. Access to the site includes access from a local access street which is likely to result in traffic, parking and associated amenity concerns.
 - v. The proposal is located on a high traffic volume road where noise is likely to have an adverse impact on the site.
 - b. Site requirements, as the site is not of sufficient size to accommodate the development with required outdoor play areas suitably located.
 - c. Development requirements as:
 - i. The visual appearance of the parking associated with the development does not reflect the residential character of the area with excessive hardstand area.
 - ii. Outdoor play areas are located adjacent to the residential boundary to the east and considered to be disruptive to residential amenity.

- iii. The Traffic Impact Statement does not take into consideration the locational circumstances of the site. The increase in traffic will have a detrimental impact on levels of service for the Alfred Road and Butler Avenue intersection, and may result in increased safety risks. It is noted that the residents submitted an independent Traffic Impact Statement which makes a number of recommendations for modifications to the road network to improve traffic and pedestrian safety which cannot be accommodated due to specific constraints identified at this location, further indicating that the site is not suitable for the development.
 - iv. Access is proposed from Butler Avenue which is a short no-through Access Road and is likely to have a significantly detrimental impact on the amenity of residents and locality.
 - v. Outdoor play areas are located adjacent to boundaries with residential properties, which may have a negative impact on the adjoining residents.
 - vi. The introduction of a commercial Child Care Centre into the predominantly residential area will likely have a detrimental impact on the amenity of the locality in regards to traffic and parking, and consequent safety issues.
3. The proposed building significantly exceeds the requirements for internal and external play areas under the *Child Care Services (Child Care) Regulations 2006*. This unnecessarily increases the bulk of the building, impacting on the existing residential amenity of the area. It also provides an opportunity for an application to be made in the future to increase the number of children at the centre, which could then potentially have an even greater impact on residential amenity.

Details: outline of development application

Insert Zoning	MRS:	Urban
	TPS:	Residential R20
Insert Use Class:		Child Care Centre – SA
Insert Strategy Policy:		Local Planning Policy 206 – Child Care Centres
Insert Development Scheme:		N/A
Insert Lot Size:		1849m ² (979m ² and 870m ²)
Insert Existing Land Use:		Residential – single dwellings

The amended application proposes a Child Care Centre over two lots, 162-164 Alfred Road, Swanbourne. It is proposed to accommodate 65 children (in lieu of the previous 90) and 12 staff (in lieu of 13), and operate Monday to Friday from 7am to 6pm.

The proposed building is double storey (total floor area of 635m²), with pitched roof and verandah / balcony surrounding. The building proposes separate activity areas for different age groups:

Activity 01 - 1-2 years	8 children (55.44m ²)
Activity 02 - 0-1 years	8 children (47.29m ²)
Activity 03 - 2-3 years	10 children (63.11m ²)
Activity 04 - 3-5 years	19 children (61.98m ²)
Activity 05 - 3-5 years	20 children (101.21m ²)

The building also proposes a sleep area and bathrooms for the children, reception, administration office, storage, laundry and staff amenities. 19 car parking bays are proposed with dual access from Butler Avenue and a left in only access from Alfred Road discussed below. Outdoor play areas are proposed adjacent to the eastern boundary, and to the southern and eastern sides of the building. The second storey also includes an outdoor play area balcony to the east and north. A landscaped buffer is proposed to the adjoining property boundaries. Vegetation is to be retained on site where possible, and verge trees are also to be retained.

The major changes from the original proposal are:

- Reduction from 90 children to 65 children, and from 13 staff to 12 staff
- Two storey building (total floor area of 635m²) in lieu of single storey (total floor area 624m²)
- Traditional pitched roof profile in lieu of skillion
- Masonry boundary fencing to neighbouring residential properties in lieu of colorbond
- Increased side setbacks to the eastern and southern residential properties
- Landscaped buffers to boundaries, including a 6m wide landscaped buffer to the southern residential property
- Reconfiguration of car parking and accessways to be 5m from adjoining residential properties, additional left in access from Alfred Road and reduction in parking bays from 20 to 19
- Additional shade trees within the car parking area.

The proposed Child Care Centre is an 'SA' use within LPS3 Table 1 – Land Use Table. In this instance it is considered that the proposed land use is not appropriate within the residential zone and will have a detrimental impact on amenity of residents (see below)

Background:

On assessing the original proposed Child Care Centre it was noted that the Town was intending to use Planning Bulletin 72/2009 Child Care Centres to assess and make comment to the JDAP on this application, however on review of the Bulletin, it was noted that it made recommendations for local government to adopt a Local Planning Policy to guide the location and requirements for Child Care Centres. With this in mind, the Town prepared Draft Local Planning Policy 206 – Child Care Centres (LPP 206) based on the Planning Bulletin requirements. Draft LPP 206 was referred to Council on 7 May and was advertised for public comment until 3 June in accordance with the deemed provisions contained in Schedule 2, Part 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015* (LPS Regs).

Following consultation, the Policy was adopted by Council 18 June 2019 (see Past Resolutions below) and the required Notice to formalise the Policy was published in the Post Newspaper on 29 June 2019.

It was considered the proposal was not consistent with the provisions of LPS3 and LPP 206, and proposed in an inappropriate location.

Following the Responsible Officer's Report (RAR) recommending refusal of the application (endorsed by Council on 2 July 2019), the JDAP refused the application at its meeting held 12 July 2019. A SAT application for review was subsequently lodged, which proceeded directly to mediation with the JDAP.

Following mediation, a SAT order for a Section 31 reconsideration was issued. Amended plans were lodged with the Town for a reduction from 90 children to 65 children. The modifications to the plans included a two storey building, modified landscaping and play areas, and changes to the access and car parking layout.

The following table outlines key dates regarding this proposal:

Date	Item/Outcome
15 April 2019	Development Application received by Council.
17 April 2019	Application undergoes internal DCU assessment.
6 May 2019	Advertising commenced.
15 May 2019	Additional information requested from applicant.
21 May 2019	Advertising closed.
30 May 2019	Additional information received from applicant.
24 July 2019	Report prepared for Council.
2 July 2019	Application considered by Council.
12 July 2019	Application considered by JDAP
15 July 2019	JDAP determination issued.
7 August 2019	SAT application lodged.
16 October and 6 November 2019	SAT mediation.
6 November 2019	SAT order for Section 31 reconsideration made.
21 November 2019	Amended plans received by Council.
22 November 2019	Advertising commenced.
29 November 2019	Advertising closed.
10 December 2019	Report prepared for Council.

PAST RESOLUTIONS

At its meeting held 18 June 2019, Council resolved to adopt LPP206 – Child Care Centres, with minor modifications in response to the submissions received during the advertising of the Draft Policy (Resolution No. 68/19).

In respect of the application for the Child Care Centre, at its meeting held on 2 July 2019 Council resolved to:

- 1. Support the Officer recommendation to the Metro West Joint Development Assessment Panel that Development Approval be refused for the development of a Child Care Centre at Lots 18-19 (162-164) Alfred Road, Swanbourne for the reasons detailed in the Council report.*
- 2. Authorise the Director Planning and Development to forward a report on the application to the Metro West Joint Development Assessment Panel.*

Legislation and Policy:

Legislation

Planning and Development Act 2005 (PDA)

Planning and Development (Development Assessment Panel) Regulations 2011 (DAP Regs)

Town of Claremont Local Planning Scheme No. 3 (LPS3)

Planning and Development (Local Planning Schemes) Regulations 2015 (LPS Regs)

State Government Policies

Residential Design Codes

Local Policies

Local Planning Policy LV206 – Child Care Centres

Consultation:

Public Consultation

The application was advertised in accordance with Council Policy LG525, however the SAT and JDAP timeframe only allowed for a one week consultation period. The amended application was advertised by mail to 41 nearby landowners and occupants, and by email to the 107 who made submissions on the original proposal. 102 submissions were received, 32 in support and 70 objecting.

A summary table of the submissions are provided as Attachment 9, and full copies are included as Attachment 10. An independent Traffic Impact Statement has also been submitted by concerned residents, and is included with the full copies of the submissions.

Submissions raised a number of concerns including increase in traffic and safety concerns for vehicles and pedestrians, parking, inappropriate location for a commercial land use, creep of commercial land uses into the residential zone, impact on residential amenity and noise, impact on property values, demand for child care services, size of the building and future uses of the proposed building if the proposed land use fails, discussed in detail below.

Submissions in support of the proposal noted a perceived shortfall of child care facilities in the immediate vicinity.

Issue Raised	Officer's comments
Traffic and Safety Significant concerns regarding traffic and safety, and negative impact on residential amenity. Safety issues will be exacerbated due to high level of traffic, increase in traffic, sight issues, and proximity to traffic lights and other intersections.	Supported Proposal will result in a substantial increase in traffic on a short cul-de-sac at a busy intersection and will likely result in a detrimental impact on residential amenity. See detailed discussion below.
Parking Overflow parking will have a negative impact on residential amenity.	Supported It is considered likely that overflow parking will occur on Butler Avenue, which may affect the amenity of

	residents.
Inappropriate Land Use and Impact on Residential Amenity Commercial development in a residential area and will have a negative impact on the amenity of the locality.	Supported Proposed Centre is likely to have a detrimental impact on the amenity of the residential locality and therefore not suitable to be located within the 'Residential' zone.
Noise Noise impact from the centre will detrimentally affect the amenity of surrounding neighbours.	Supported Application has not taken into account the amenity of adjoining residences, with an outdoor play immediately adjacent common boundaries.
Visual Impact and Size of Building Scale of the proposal is large, and the building too high. The size of the building has increased, which could provide for the developer to apply for an increase the number of children	Supported The building is still considerably larger than required. Also includes a large hard stand area for the entire frontage of the property. This is not considered in keeping with the residential streetscape and will impact negatively on the current residential amenity.
Precedent and Future Use of Building Commercial development in a residential area will set a negative precedent for future commercial development	Supported Any future land uses on the site would need to comply with LPS3, Local Laws and any relevant Local Planning Policy requirements.
Demand for Child Care Services Shortfall of child care facilities in the immediate vicinity.	Noted No information has been provided to demonstrate a need for Child Care Centres in the area

Planning Assessment:

The modified development proposes the following variations to the provisions of LPS3 and LPP 206 – Child Care Centres. Where development does not comply with the provisions of LPS3, a variation can only be considered if provided for under the terms of the Scheme. Council must have regard to the Policy requirements, however this does not mean that Council cannot vary the Policy requirements where such a variation is considered appropriate.

Local Planning Scheme

Item	Requirement	Proposal	Compliance
Land Use – Table 1	SA means that the land shall not be used for the purpose indicated but that in exceptional cases the Council may specially approve of such use where advertising has been carried out	Day Care Centre is an SA land use in the Residential zone.	Does not comply. It is considered a large scale Child Care Centre is an inappropriate land use in this location in the Residential zone.

	and the Council has considered all submissions.		
Clause 46 – Objectives of the Residential Zone	Clause 46(3) of LPS3 refers to “the continuation of the domestic scale and architectural character of the area...”	Amended plans submitted introduce elements with a more compatible appearance to the surrounding residential area	Does not comply. It is still considered the design is unnecessarily bulky, with a large area of hardstand in the front setback, and inconsistent with the residential character of the locality.

LPP206 – Child Care Centres

Item	Requirement	Proposal	Compliance
Location requirements.	<ul style="list-style-type: none"> - Close to nodes, preferred in Local Centre, Town Centre, Highway or Educational, or Residential immediately adjacent to these zones. - serviced by public transport and suitable from traffic engineering / safety view. - Sufficient size to accommodate development. - No access from local access street where traffic, parking and amenity concerns may result. - Not were road noise will have adverse impact on site. 	<ul style="list-style-type: none"> - proposed on Residential not adjacent to nodes or preferred zones. - Traffic report does not adequately address safety. - Site not large enough to accommodate development. - access from local access street (cul-de-sac) - Alfred Road has a high volume of traffic. 	Does not comply.
Site requirements	Sites of sufficient size to accommodate development.	Site not large enough to accommodate development given variations.	Does not comply.
Development	- Visually reflect	- Not consistent	Does not comply.

requirements	<p>character of area and enhance amenity.</p> <ul style="list-style-type: none"> - Play areas away from high traffic and dwellings. - Traffic Impact Statement. - No access from short access road such as a cul-de-sac -- S- Play areas and parking away from noise sensitive uses. - Information on facilities in locality. - Centre to have minimum impact on amenity of area and will not create unsafe conditions. 	<p>with residential character.</p> <ul style="list-style-type: none"> - Play areas adjacent to residential. - TIS considered to not adequately address site specific issues. - Access from short cul-de-sac. -- Play areas and parking adjacent to residential. - No information provided. - Likely to have a significant detrimental impact on residential amenity due to scale, traffic, safety and parking issues. 	
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Officer Comments

Local Planning Scheme No. 3

Land Use

The proposed Child Care Centre is an 'SA' use within LPS3 Table 1 – Land Use Table, meaning that the land shall not be used for the purpose indicated but that in exceptional cases the Council may specially approve of such use where the application has been publicly advertised and the Council has considered all submissions and is satisfied that the use will not have any adverse or detrimental effect on the residents or amenity in the locality.

In considering the application the Council needs to take into account the impact on adjoining land owners and occupiers. Reducing the number of children from 90 to 65 has not decreased the size of the building, which has increased by 11m² despite the reduction in children. An additional 228 car movements have been forecast, which is 242% above the existing average 161 residential car movements on the Butler Avenue cul-de-sac. Taking into account the left in access from Alfred Road the increase in traffic on Butler Avenue could be in the order of 220%. The introduction of a commercial land use into a predominantly residential area is likely to detrimentally impact on amenity of the area through noise disturbance from parking and increased traffic, which may in turn result in safety issues. The site's location on a busy street (Alfred Road), and also being located on a short cul-de-sac (Butler Avenue), is of concern. As noted below the Town's Engineering Services have concerns that the trip distribution has not been correctly modelled, and safety issues have not adequately been addressed. The current availability of on street parking in

Butler Avenue may also be compromised, noting also the restrictions in parking which also apply along Alfred Road in this location. It is considered the proposal will have a detrimental impact on the amenity of residents in the locality and the land use at this scale is therefore not supported.

Clause 46 – Objectives of the Residential Zone

Clause 46(3) of LPS3 refers to “*the continuation of the domestic scale and architectural character of the area...*” The amended plans have a traditional gable roof and has more of an appearance of a double storey dwelling. The scale of the dwelling however is bulky given that the total floor area has not been reduced. In addition, with the inclusion of a 19 bay car parking located within the setbacks to Alfred Road and Butler Avenue, the residential appearance of the development is diminished.

(Clause 37A – Non-Residential Development Abutting a Residential Zone

Clause 37A of LPS3 contains specific requirements for setbacks from the adjoining residential properties.

Clause 37A(1)(a) requires:

(a) The following building setbacks from the Residential zoned land area provided:

- (i) Six (6) metres for the ground floor and first floor with all other floors being set back six (6) for each additional storey;*
- (ii) Notwithstanding (i) above Council may accept the ground floor being constructed up to the boundary of the Residential zoned land providing the wall on the boundary does not at any point exceed a height of two (2) metres above natural ground level (measured at the common boundary) of the adjacent residential land.”*

The amended design proposes a compliant 10m setback to the southern boundary and a 6m setback to the eastern boundary.

Local Planning Policy 206 – Child Care Centres

Guidelines on Child Care Centres have been prepared by the Western Australian Planning Commission (WAPC) in Planning Bulletin 72/2009 Child Care Centres (BP 72) to assist Local Government in preparing a LPP to address common issues relating to this matter. Based on BP 72, and modified to address local amenity concerns, LPP 206 – Child Care Centres adopted by Council on 18 June 2019 to provide guidance on the appropriate location of Child Care Centres, setting out provisions to minimise the impact of Centres on the surrounding locality and the impact of the area of the Centre, and consider the health and safety of children attending the centre.

The proposed Child Care Centre is inconsistent with the following provisions of LPP 206:

Location Requirements

LPP 206 outlines preferred locations for centres:

- *Close to or part of commercial, recreation or community nodes and education facilities, with preferred locations on lots zoned “Local Centre”, “Town Centre”, “Highway”, or “Educational”, or on “Residential” lots immediately adjacent to these zones.*

The proposed Centre is on a lot zoned "Residential" in a locality which is not adjacent to commercial or community nodes.

- *Areas where adjoining land uses are compatible, serviced by public transport and considered suitable from a traffic engineering / safety view.*

The site immediately abuts residential properties. Traffic and safety has also been raised as a significant concern given the increase which will result in Butler Avenue, discussed below. Butler Avenue currently has an average of 161 residential vehicle movements per day. There is a forecast of 228 vehicle trips to be generated, with 194 on Butler Avenue, which is a 220% increase above the current volumes on Butler Avenue. If the development is approved, it would be appropriate to include a condition the application be required to improve the road design by constructing a median splitter island at the Butler Avenue and Alfred Road intersection to improve safety conditions by reducing ability for vehicles to cut the corner and provide a pedestrian refuge. A median island on Alfred Road is also recommended to prevent illegal turns into the Alfred Road crossover and access from the west. Additionally, the independent Traffic Impact Assessment submitted by Cardo recommends a channelised right turn lane at the Butler Avenue intersection and basic auxiliary left turn treatment from the east. These modifications are indicatively shown on Attachment 12. These can also be requested as conditions should the application be approved.

- *Site of sufficient size to accommodate the development without impacting on the amenity of the surrounding area.*

Given the amended plans have not reduced the floor area of the building, the car parking area has been increased to create a disproportionate amount of hardstand, and outdoor play areas are still located adjacent to the eastern boundary, This demonstrates the site is being overdeveloped, and that a Child Care Centre for 65 children and 12 staff is not appropriate for this site.

- *Not to be located where access is from major roads, close proximity to major intersections or where access is from a local access street which may result in traffic, parking or associated amenity concerns.*

Access is proposed left in from Alfred Road (District Distributor) and full movement access is proposed from Butler Avenue which is classified as a Local Access Street. The increase in traffic and street parking on Butler Avenue is likely to result in a negative impact on the amenity of the locality. Being a cul-de-sac the single entry and egress means that the majority of vehicle movements from residents and visitors, and customers and staff of the Centre are concentrated at that intersection, with no available flow through to other streets. With vehicle movements concentrated at the intersection that would otherwise be available on a through road the adverse impact on amenity of the residents is effectively doubled.

- *Not to be located where noise from nearby roads are likely to have an adverse impact on the site.*

In this instance the Centre is located on Alfred Road which has a high volume of traffic braking and accelerating relative to the Myera Street signalised intersection. As noted above, a condition can be recommended to the JDAP should they support the application for acoustic protection to be included in the building construction as per the recommendations in the Acoustic Report.

Site Requirements

LPP 206 states *sites should be of sufficient size, shape and dimension to accommodate the development (inclusive of buildings with required setbacks,*

parking, outdoor play areas and landscape buffer strips); and be level/non elevated sites to reduce impacts on access and noise transfer/mitigation.

Whilst on a level site, the variations proposed and bulkiness of the building demonstrates the size of the Centre is too large for the site. Non-compliant outdoor play areas are proposed adjacent to residential development and large parking hard surfaces within the front setback, (discussed below).

Development Requirements

In addition to requirements applicable under LPS3 (in particular cl.36(6) and cl.37(A)), LPP 206 addresses the following:

- *Visual appearance of developments should reflect the character of the area, and enhance its amenity.*

As noted above, it is considered that while the proposed built form is more consistent with the residential character of the area, the large hardstand parking area diminishes the residential amenity.

- *Parking for staff and children is to be at a rate of one space per five children. Where located in areas or with access from streets with limited capacity to accommodate overflow parking, on-site parking should be increased at a rate of 0.5 bays per staff member.*

Given the site gains access from Butler Avenue which has limited capacity to accommodate overflow parking, the increased rate of 0.5 bays per staff member is recommended, resulting in a car parking requirement of 19 bays, which has been provided on the site plan. It is noted that two of the bays are in tandem formation, for these to be supported they will need to be for staff parking only. Should the JDAP support the application a condition is recommended that the internal tandem bay be marked for Staff Only. It is noted that loading and waste collection will not occur during peak times so will have limited impact on the availability of parking bays, which can also be recommended as a condition. A further condition that any parent gatherings be held at different times for the different age groups may also assist in minimising overspill of parking onto local roads.

- *Outdoor play areas to be in a safe location away from high traffic areas and also away from any adjoining noise sensitive premises such as dwellings.*

The outdoor areas located adjacent to the future dwelling to be constructed to the east is not consistent with LPP 206 and is not supported given that noise impacts on the adjoining properties need to be mitigated. Should the JDAP support the application a condition is recommended that the proposal be redesigned to separate play areas from neighbouring residential properties.

- *A traffic impact statement shall be provided with all applications which addresses the site and its location, the expected trip generation, parking requirements and parking area design (including access located in accordance with LPS3 requirements), existing and future traffic conditions, current road safety conditions including crash history in the immediate locality, and the expected impact on existing and future traffic conditions.*

The revised Traffic Impact Statement (TIS) submitted with the application states that traffic operations of the road network will not be adversely affected by the additional traffic. However the actual increase in traffic will be in the order of 220% above the existing volumes on Butler Avenue, which is a significant impact on the amenity of the local street. It is noted that the residents submitted an independent TIS which makes a number of recommendations for modifications to the road network to

improve traffic and pedestrian safety which cannot be accommodated due to specific constraints identified at this location, further indicating that the site is not suitable for the development. In respect of the revised TIS concerns are discussed in the response to submissions:

- *No access permitted from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads.*

Access is now also proposed from Alfred Road (District Distributor) left in only. This is not ideal, however it has been proposed in order to reduce the concentration of the additional traffic on the Butler Avenue. Access is also proposed from Butler Avenue which is classified as a Local Access Street, and given it is a short no-through road, the increase in traffic and potential street parking on Butler Avenue is likely to result in a negative impact on the amenity of the locality.

- *A noise impact assessment shall be provided with all applications which address the prime objectives of limiting the impact of a Child Care Centre on adjacent residential properties and also limit the impact of external noise sources on the Child Care Centre.*

The acoustic assessment submitted with the application identifies the proposal will be compliant with the requirements of the *Environmental Protection (Noise) Regulations 1997* for the proposed hours of operation. The additional acoustic report also demonstrates that noise ingress mitigation can be achieved with standard construction, with additional height of balustrading and glazing to the northern site of Activity Room 4. Should JDAP approve the proposal a condition should be recommended that the building comply with the recommendations of the acoustic report.

- *All servicing and deliveries to the site are to take place during the operational hours and not during peak morning drop-off or peak afternoon pick-up periods of the Child Care Centre.*

The application indicates that rubbish collection will be carried out outside of peak hours. Should JDAP approve the proposal a condition should be recommended that servicing and deliveries, including waste collection, be limited to the above, but restricted to 10.00am to 3.00pm to reduce the impact on the amenity of the neighbours.

- *Where located adjacent to noise sensitive uses, all noise generating activities such as outdoor and indoor play areas, parking areas to be located away from the noise sensitive use. Amenity impacts are to be mitigated by appropriate fencing, non-openable and double glazing (or equivalent) windows together with landscaping.*

As noted above a play area is located adjacent to boundary of the eastern residential property. As above, should the JDAP support the application a condition is recommended that the proposal be redesigned to separate play areas from neighbouring residential properties.

- *The design and construction of the Day Care Centre is to also mitigate against impacts from external noise and vibration sources.*

An assessment of external noise of Alfred Road on the centre has been provided. As above, should JDAP approve the proposal a condition should be recommended that the building comply with the recommendations of the acoustic report.

- *In order to assess the impact to the local community that a proposed Child Care Centre has on the level of service of similar or approved facilities, applications*

are to include information on the level of existing (or proposed) services in the locality, proximity to other centres, population catchments for the proposed centre and the number of primary schools and kindergartens in the locality, together with the number of students at these facilities.

No information has been provided, however it is acknowledged the application for Development Approval was lodged prior to the Council adoption of LPP 206. However WAPC Planning Bulletin 72/2009 – Child Care Centres specifically notes that impact on existing facilities should be assessed by the proponent at time of application. Without this information the Town is not able to determine whether there will be an impact on existing Child Care Centres and Family Day Care operators in the vicinity.

- *Approvals should only be issued where it can be demonstrated that the Child Care Centre will have minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians, cyclists or road users.*

It is considered the introduction of a commercial Child Care Centre into the predominantly residential area will likely have a detrimental impact on the amenity of the locality in regards to traffic and parking, and consequent safety issues.

Responses to Submissions

The following applicant and officer comments are made in response to the submissions:

Traffic and Safety

Significant concerns have been raised regarding traffic and safety, and the negative impact on residential amenity this will have. Concerns have been raised that current safety issues will be exacerbated due to the existing high level of traffic using Alfred Road, increase in traffic generated by the Centre, sight issues (line of sight, blind spot and setting sun) on Alfred Road, and proximity to traffic lights and other intersections. Turning in and out of Butler Avenue may become increasingly dangerous and vehicles queueing on Butler Avenue are likely to block the driveways of adjacent houses, disrupting neighbourhood amenity. Residents are concerned the proposal does not comply with the WAPC Planning Bulletin 72/2009 – Child Care Centres (PB 72/2009). In regards to the applicant's TIS, it has been noted by residents that the number of vehicles expected to visit the site and the length of vehicle queues has been substantially underestimated, and the assumption that 70% of peak AM traffic comes from the west is not realistic. The TIS also doesn't sufficiently consider adjacent intersections. Accidents in the locality stated in the TIS are not accurate.

The independent TIS from Cardno commissioned by the surrounding residents found:

- Sight lines at Alfred Road are impeded and the increase in traffic could potentially exacerbate the safety issues at the intersection.
- The additional turning traffic necessitates upgrades to the intersection (channelised right turn, auxiliary right turn and auxiliary left turn)
- Queues from the Rochdale Road intersection are expected to extend beyond Butler Avenue impacting on the operations of Alfred Road, Butler Avenue and Mayfair Street.
- Crossovers to be designed for pedestrian path to have priority.

- Crossover on Alfred Road is undesirable given high traffic volumes, safety concerns and visibility issues. Butler Avenue crossover is located 40m from the Alfred Road intersection which is not in accordance with AS2890.1.

Applicant's response:

"Transcore have prepared a revised Transport Impact Statement ('TIS') which includes modelling beyond the requirements of the Western Australian Planning Commission ('WAPC') Transport Impact Assessment Guidelines ('TIA Guidelines'). The revised TIS includes 'worst-case-scenario' traffic generation/distribution and network modelling with the Alfred Road and Rochdale Road signalised intersection.

The TIS found no safety issues with the Butler Avenue and Alfred Road intersection or Rochdale Road and Alfred Road intersection, or indication that the proposed development will create or contribute to any safety issues. All overhead power lines in the area have been moved underground, resulting in the removal of power poles which had the potential to create a blind spot. The Town will ensure that street trees are maintained to ensure maintenance of sight-lines.

In terms of the impacts on the intersection of Butler Avenue and Alfred Road, Transcore's traffic modelling confirms as follows:

- *Depending on the post development movement, the number of queued vehicles on Butler Avenue turning left onto Alfred Road would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (less than 1 second);*
- *Depending on the post development movement, the number of queued vehicles on Butler Avenue turning right onto Alfred Road would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (i.e. 5 and 2 seconds during AM and PM peak, respectively);*
- *Depending on the post development movement, the number of queued vehicles on Alfred Road turning right into Butler Avenue would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (less than 1 second).*

Based on the traffic modelling, the impact of the proposal on the existing traffic movements associated with the existing Butler Avenue residential properties is minor with no significant impact to the queuing length of the vehicles or delay time for vehicles waiting to turn onto Butler Avenue from Alfred Road or onto Alfred Road from Butler Avenue. The proposed development will therefore have a negligible impact on the how residents access their property on Butler Avenue.

It is important to note that PB 72/2009 is a guiding document only and is not binding on the decision making of the Council. Further, the provisions outlined in PB 72/2009 are generally recommendations as to how the objectives of the document may be met, as opposed to prescribed requirements.

Noting the above, with regard to the location of child care centres, Clause 3.3 of PB 72/2009 states the following provisions relating to road safety:

The appropriate location of a child care centre is crucial in meeting the needs of children and their families. It also is crucial in limiting the impact a child care centre may have on surrounding activities and vice versa.

This may be achieved by located child care centres on sites that are:...

- d) serviced by public transport (where available);
- e) considered suitable from a traffic engineering/safety point of view; and...

Child care centres generally would not be suitable where:...

- j) access is from a major road or in close proximity to a major intersection where there may be safety concerns;
- k) access is from a local access street which may impact on the amenity of the area due to traffic and parking;...

It is considered that the proposal complies with the above provisions relating to road safety for the following reasons:

- *The subject site is serviced by public transport, with a high frequency bus route located directly adjacent on Alfred Road;*
- *The proposal is considered suitable from a traffic engineering/safety point of view, as outlined in the TIS;*
- *Access is not located in close proximity to a major intersection, and the TIS has identified no safety concerns relating to the proposal; and*
- *Access is from a local access street, however this will not impact on the amenity of the area for the following reasons:*
- *The largest traffic increases during the peak hour of operation will be in order of 34vph on Alfred Road, hence the anticipated impact on the surrounding road network will not be significant and would be well within the capacity and function of the relevant roads;*
- *Depending on the post development movement, the number of queued vehicles on Alfred Road and Butler Avenue would remain unchanged, and the average delay for the same movement would increase marginally;*
- *The expected level of service of the Alfred Road / Rochdale Road intersection would not be materially impacted by the proposal;*
- *The expected level of service of the Alfred Road / Butler Road intersection will only be marginally impacted by the proposal; and*
- *The proposal is fully compliant with LPP 206 with respect to parking.*

PB 72/2009 also states the following with regard to traffic impacts:

A traffic impact statement/assessment should be required for the development of a child care centre.

This statement/assessment should address:

- a) *the site characteristics and surrounding area;*
- b) *the proposal and its expected trip generation;*
- c) *parking requirements, including the design of parking area, and any pick-up and drop-off facilities;*
- d) *existing traffic conditions and any future changes expected to the traffic conditions;*
- e) *current road safety conditions, including a crash history in the locality; and*
- f) *the expected impact of the proposed development on the existing and future traffic conditions.*

A child care centre should be approved only if it can be demonstrated that it will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users.

As discussed previously, a TIS has been provided with the Application which addresses each of the above considerations. The TIS finds that the proposal will not create or exacerbate any road safety issues.

As noted previously, the TIS found no evidence that the proposal will result in unreasonable increase in traffic. The impact of the proposal was found to be negligible.

In respect to the proximity to the traffic lights at the Rochdale Road and Alfred Road intersection, no issues have been identified by Transcore in the preparation of the TIS.

The car parking area is designed to accommodate full vehicle manoeuvrability, and access and egress in forward gear, including right turns onto Butler Avenue. Visitors will not be required to turn around at the cul-de-sac 'head' of Butler Avenue. The TIS found no indication that the proposed development will create or contribute to any safety issues. The majority of trips would not be impacted by the setting sun.

The traffic modelling conducted by Transcore includes 'worst-case-scenario' traffic generation and distribution. This includes both a 70/30 and 30/70 east/west distribution. As a result, the TIS found no safety issues with the surrounding streets, or indication that the proposed development will create or contribute to any safety issues.

Any crashes which are considered substantial, including those involving pedestrians and cyclists, are reported and included in the Main Roads WA crash rate data. The TIS prepared by Transcore in accordance with the WAPC TIA Guidelines and submitted with the Application was prepared based on this data. The TIS identifies 6 crashes at the Alfred Road and Butler Avenue intersection, of which none involved pedestrians or cyclists. None of the crash factors are denoted as higher than expected.

In regards to the Cardno report, any existing substantial vegetation within the road verge that may affect the intersection sightlines should be regularly maintained and pruned. This is the responsibility of local government and such issues are not be responsibility of the developer.

Furthermore, any potential geometry, operational or safety issue identified for an existing road or intersection is the responsibility of the asset owner, which in this case is the local authority. As such, it is the responsibility of the particular local authority, and not the developer, to address any of these potential existing issues.

The intersection SIDRA capacity assessment does not identify any such requirement for channelising and auxiliary lane treatments. The level of turning traffic from Alfred Road into Butler Avenue does not meet the relevant turn pocket warrants.

The eastbound traffic flows on Alfred Road are pronounced during the typical weekday morning peak commute period and accordingly some slowdown and queueing at traffic signals may be occasionally experienced on the western approach to the traffic signals. However, this situation is a common occurrence at traffic signals within an urban environment during peak weekday periods. Importantly, any queues on the western approach to the signals are generally cleared after the light turns green and within one signal phase. As such any delays associated with the right-turn out movements from Alfred Road would only be temporary and occasional.

Furthermore, Butler Avenue outbound movements as well as right-turns from Alfred Road into Butler Avenue are greatly assisted by the proximity of traffic signals and resultant creation of gaps in westbound traffic flows along Alfred Road.”

Officer Comment

The main concerns raised in the submissions relate to the proposed increase in traffic on Butler Avenue and Alfred Road, and associated safety concerns, which would result from the proposed Child Care Centre, with approximately 228 daily trips forecast to and from this site. This is an increase to 220% of the current traffic volumes using Butler Avenue.

An increase to 220% of the existing traffic volumes will require upgrades to the adjacent road layout, requiring traffic islands be constructed. It is also worth noting that whilst some of the traffic generated will be spread over the day, the peak hour drop off and pick up times coincide with the existing peak hour traffic on Butler Avenue, increasing congestion and queuing at the intersection.

The TIS submitted by the applicant has been prepared in accordance with WAPC Transport Impact Assessment Guidelines Volume 4, which allows for a TIS to be prepared on the basis that the traffic increase is deemed to have only a Moderate Impact if within the road's capacity level of 3,000 vehicles per day. However this is an assumption based on the hierarchy classification of the road being a local access road. It does not consider the context of this street which is a cul-de-sac abutting native bushlands with current traffic volumes of 161 vehicles on an average day. The categorisation of the road based on its hierarchy is therefore not agreed as a good basis for the requirements of a more details analysis. It is not commensurate with a quiet, slow speed cul-de-sac, and does not reflect the current usage and amenity enjoyed by the residents of the street.

The Town's Engineering Services have undertaken a review of the TIS submitted by the applicant. It is considered that:

- The TIS provided with the development application is flawed as its conclusions and modelling is predicated on an arbitrary vehicle trip distribution which does not consider trip continuation to local activity centres such as schools or commercial areas. It also fails to consider the existing operation of the local road network, or the limited number of routes available to the site originating within the locality due to geographic constraints such as the Lake Claremont bushlands.
- The SIDRA analysis provided by the applicant shows a noteworthy decrease in the level of service of the Alfred Road and Butler Avenue reclassifying levels of service from a category C to a category D. This is without a more critical analysis being undertaken considering any trip continuation, which would likely increase delays even further.
- The applicant has suggested that the increase in traffic is minor when the number of vehicles are considered in relation to the hierarchy of the intersecting roads. This however fails to reflect the existing amenity of the road for the residents. The projected actual increase in volumes is a 220% increase from the current usage of Butler Avenue. This is considered significant in the context of the existing usage of the road and intersection.
- Butler Avenue is a cul-de-sac. The TIS has assumed that visitors to the proposed Child Care Centre will not utilise the on road parking or use the entire length of Butler Avenue to drive down and turn around to return to the intersection to depart. It is considered likely that some vehicles will traverse the

length of the cul-de-sac, and also potentially drive into nearby residential crossovers, and thus impact on residential amenity in one form or another. The forecast peak hours will coincide with the existing am peak hour usage by the residents and it is considered likely this additional traffic will delay them from exiting from their driveways, further impacting the amenity of the street that residents currently enjoy.

- Analysis of the operation of the adjacent intersections has been undertaken and some of the results are questionable. The input parameters have not been provided with the report, however it appears to demonstrate that the level of service at the Alfred Road and Rochdale Road intersection improves due to the increased volume of traffic generated by this development, which is counter intuitive. It would seem more likely that delays will increase.
- The traffic analysis of the local intersections fails to consider Mayfair Street in the SIDRA analysis despite being within 10m of Butler Avenue on the north side of Alfred Road making it effectively a staggered four way intersection. It is considered likely that the inclusion of this intersection as part of the network analysis would result in a further increase in delays at the Butler Avenue intersection and increase safety concerns due to driver behaviour. Longer delays may increase the occurrence of drivers taking dangerous risks, also parking in Mayfair Street and subsequent pedestrians (including small children) crossing Alfred Road to the Centre, adding again to the existing safety concerns.
- The Town informed the applicant of two recent crashes which have occurred within 40m of the development site where children were crossing while walking home from a local school. Both accidents were caused by vehicles turning from a side road into Alfred Road and hitting crossing pedestrians. It was reported that in one of these cases a child was hospitalised with spinal injuries. Despite being provided with this information the applicant has made no mention of the incidents within subsequent traffic and road safety analysis, nor mentioned it as a matter for consideration as a site specific issue. This lack of consideration demonstrates that the reports provided are inadequate and the applicant is not satisfactorily addressing the safety concerns of the Town and local community.
- In order to improve safety aspects of the design crossovers need to be designed for pedestrian path to have priority as per the independent TIS. Should the development be approved this can be included as a condition.
- Due to the impact of the development on the current traffic operation, road modifications (Attachment 12) are recommended to improve the road design and better accommodate the development. A splitter median island is recommended at the Butler Avenue and Alfred Road intersection in order to provide a safe pedestrian refuge as per the applicant's TIS. A median island on Alfred Road opposite the proposed left in crossover will act to prevent incidents of the left in crossover being misused. These modifications necessitate minor consequential changes to the intersection geometry of Butler Avenue and Alfred Road and associated pedestrian path links to improve the operation of the splitter island, and a recommended relocation of the Alfred Road crossover 5m to the west of the proposed crossover location to place improved constraints on potential entry from the west along Alfred Road without impacting on the residential crossover movements opposite. These upgrades would be subject to detailed design to be determined by the Town of Claremont at the cost of the applicant and can be included as conditions should the application be approved. Other intersection upgrades suggested by the the independent TIS for channelised right turn and auxiliary left turn (deceleration left turn pocket) on Alfred Road cannot be

accommodated within the existing road constraints (proximity of the intersection with Mayfair Street and restricted sight lines from Butler Avenue).

Parking

Concerns were raised that there will be a negative impact on the current residential amenity due to overflow parking on the road which will limit parking available for visitors to surrounding residential dwellings.

Applicant response

“The proposal is compliant with the Town of Claremont (‘Town’) Local Planning Policy 206 – Child Care Centres (‘LPP 206’) with regard to parking. LPP 206 requires the provision of car parking in excess of the recommendation in PB 72/2009, and includes an additional provision for parking if the subject site is located on a street unable to facilitate verge parking. Given its compliance with LPP 206, the proposed development will not need to rely upon verge or street parking.

The proposal also aims to encourage parents and children to utilise active forms of transport including walking and cycling, through the provision of bicycle racks, proximity to the adjacent high-quality shared pedestrian and cycle path on Alfred Road, and location within a residential area.

The proposal is well-connected to public transport, with a high frequency bus route located adjacent to the subject site on Alfred Road, which can be utilised by staff in particular. The nearest bus stops are serviced on weekdays between 6:25am to 6:59pm towards Perth, and between 7:05am and 7:04pm from Perth.”

Officer comment

It is considered unlikely that public transport, cycling and walking will be utilised by customers of the centre due to the nature of the land use. It is considered very likely that any overflow parking will occur on Butler Avenue, and may even be the preferred ‘easier’ option for some customers. Whilst it is acknowledged there is compliant parking on site, this does not take into account human behaviour, which may result in parking on the street which will affect the amenity of residents in Butler Avenue.

Inappropriate Land Use and Impact on Residential Amenity

Concerns were raised that the proposal is a commercial development in a residential area and will have a negative impact on the amenity of the locality.

Applicant response

“The proposal is capable of approval within the ‘Residential’ zone and is consistent with the objectives of the ‘Residential’ zone. The location of the proposal is intended to accommodate local families by reducing travel times and number of car trips, and encouraging active transport options including walking and cycling. The anticipated impact on the surrounding road network is expected to be negligible.

The proposal has been designed to be consistent with the surrounding built form and character of the area. The proposal incorporates extensive landscaping, and building materials and finishes which draw inspiration from both nature and the surrounding residential character.

The proposal has been designed to comply with the Environmental Protection (Noise) Regulations 1997 (‘Noise Regulations’).”

Officer comment

As discussed below, it is considered the proposed land use is inappropriate within the ‘Residential’ zone. LPP 206 recommends preferred locations for Centres near

commercial, recreation or community nodes and education facilities, with preferred locations on lots zoned 'Local Centre', 'Town Centre', 'Highway', or 'Educational', or on 'Residential' lots immediately adjacent to these zones. The proposed Centre is on a lot zoned 'Residential' in a locality which is not adjacent to commercial or community nodes. It is considered the increase in traffic, and on street parking which will result from the proposed Centre is likely to have a detrimental impact on the amenity of the residential locality and it therefore not suitable to be located within the 'Residential' zone as required by the Scheme.

There are a number of land uses that can be considered within a 'Residential' zone, however it is the intent that these uses be fully compatible with residential land uses, and incorporate into the 'Residential' zone as additional land uses rather than a large stand-alone land use, for example Home Offices and Home Occupations, Aged Care, or Family Day Care where five or six children are cared for. Although reduced in size from the initial proposal, the proposed Centre is a significantly large commercial operation, with 65 children and 12 staff, and still incompatible with the adjoining residential land uses.

As noted above it is considered the large Child Care Centre land use is not appropriate within the 'Residential' zone, as it is likely to have an adverse impact on the residential amenity of the locality. It is the expectation of existing residents that the "Residential" zone will be maintained for residential purposes. It is considered the considerable increase in traffic on the short Butler Avenue cul-de-sac will have a significant impact on the amenity of the quiet cul-de-sac. At the R20 density it would normally be the expectation that the combined lots could be redeveloped with four dwellings, resulting in an increase of daily vehicle movements in the order of around 30 trips from three additional dwellings, and limited impact on residential amenity and traffic movement.

Noise

Concerns were raised the noise impact from the centre will detrimentally affect the amenity of surrounding neighbours. The Noise Management and Child Supervision Policy is unrealistic and difficult to implement.

Applicant response

"As noted previously, the proposed built form has been designed to comply with the Noise Regulations. The proposal also includes additional provisions in order to further reduce the impact of noise on residential amenity. These measures include a wide landscaping buffer to the southern boundary, brick boundary walls, glass screening to the balconies, and a detailed Noise Management and Child Supervision Policy ('NMCSP').

The NMCSP is based on a standard policy which has been implemented in many child care centres throughout Perth. Its provisions relating to the supervision and management of children, such as limiting the number of children playing outside, and the locations in which they play, are standard and common measures for child care centres.

Further, the proposal is compliant with the Noise Regulations without the implementation of the NMCSP. The proposed built form has been designed to comply with the Noise Regulations in itself. The proposal includes a number of additional provisions, including the NMCSP, which go above and beyond the Noise Regulations in order to significantly reduce the impact of noise on residential amenity."

Officer comment

Whilst it is noted the Acoustic Assessment for the proposed Child Care Centre demonstrates the noise levels will comply with *Environmental Protection (Noise) Regulations 1997*, the application has not taken into account the amenity of adjoining residences, with an outdoor play immediately adjacent common boundaries.

Visual Impact and Size of Building

Concerns were raised that the scale of the proposal is large, and the building too high in relation to existing properties. The size of the building has increased, which could provide for the developer to apply for an increase the number of children which can be facilitated by this proposal.

Applicant response

"The footprint of the proposed development is approximately 328m². This is similar to other houses located on Butler Avenue and the wider surrounding residential area. Therefore, the proposed footprint of this development is consistent with the footprint of existing development in the area.

Furthermore, the footprint of the proposed development is considered to be lesser as the development is across two (2) lots, with a combined site area of approximately 1,860.6m². This means the site coverage is only approximately 17.6% which is considerably lower than all other development in the area.

The height and scale of the development is similar to that of a two-storey single house within a residential area and is reflective of the height and scale of other residential development in the area. In addition, the building height and setbacks are compliant with the provisions of the Town's Local Planning Scheme No. 3. Therefore, the physical size of the development is not significant.

A landscaping strip is provided between the car parking area and street boundaries in order to partially screen the cars from view from the public realm, and improve the visual amenity. Mature trees are also proposed between every three bays, in accordance with the Town's Local Planning Scheme No. 3 requirements.

The proposed development has the appearance of a single house when viewed from Butler Avenue and Alfred Road both in terms of both scale and character. The scale of the development is similar to that of a single house within a residential area and is reflective of the scale of other residential development in the locality.

The proposed development has been designed purposely to reflect the character of the surrounding residential properties. Meyer Shircore Architects has undertaken a character study of the locality to determine key architectural features, construction materials and colours. The findings of this study has influenced the design and form of this development. Similar design elements (such as a traditional pitched roof, a balcony, vertical windows) and construction materials (such as colorbond, weatherboard, feature stone walls, masonry) from the surrounding area have been incorporated into the proposed development to ensure this consistency. Therefore, the proposed built form is a proper representation of the surrounding residential character.

This Application seeks approval for up to 65 children and 12 staff. There are no prescriptions on the maximum size of child care centre developments in the Town of Claremont or under PB 72/2009. This Application is required to determined based on what is proposed. Should this proposal be approved any changes will require further application. "

Officer comment

It is acknowledged the building has a low site cover and the building has traditional residential elements incorporated into the design. However the building is still considerably larger than required, having increased in floor area from the original proposal, now being 635m² in lieu of the original 624m² proposed as single storey, creating additional unnecessary building bulk. The internal play areas are 50% (117m²) larger than required for the proposed 65 children and could theoretically accommodate 36 additional children (total 101 children) under the provisions of the *Child Care Services (Child Care) Regulations 2006* (Child Care Regs). This raises concerns that should this application be approved, a future application could be submitted to increase the number of children at the Centre in the future. While it is acknowledged that any future application will be dealt with on its merits, the provision of a larger Centre in the first instance only encourages this as a potential outcome. It is considered appropriate that the Centre should be purpose built and therefore reduced in size commensurate with the Child Care Regs requirements for 65 children. Should this application be approved it is recommended that a condition be included to reduce the size of the building accordingly. The site also includes a significantly large hard stand area for parking and accessways for the entire dual street frontage of the property. This is not considered in keeping with the residential streetscape and will impact negatively on the current residential amenity.

Precedent and Future Use of Building

Concerns are raised that a commercial development in a residential area will set a negative precedent for future commercial development, or other after-hours uses of the proposed premises.

Applicant response

"A child care centre is capable of approval within the 'Residential' zone under the Town's LPS3. In addition, the Town is required to consider each Application on its merits and just because the Town may have supported one type of non-residential development within the 'Residential' zone does not ensure support for another."

Officer comment

Concerns were raised that if the proposed Child Care Centre land use fails, future non-residential commercial land uses on the site would create additional adverse impacts on the amenity of the residential area. As a result of the design, it is considered the building would be highly unlikely to be retrofitted as a residence. However any future land uses on the site would need to comply with LPS3, Local Laws and any relevant Local Planning Policy requirements. There are several non-residential land uses which can be considered by the Town in the 'Residential' zone under LPS3. If the proposed Child Care Centre were to proceed and subsequently fail, impacts on the surrounding residential land uses would need be carefully considered should any future applications for a change of use be proposed.

Demand for Child Care Services

Concerns are raised that the demand for child care services in the area is not established.

Applicant response

"PB 72/2009 notes that legal decisions have confirmed that the demand for a commercial facility is not a relevant planning consideration, unless there is a demonstrable impact on the amenity of an area. It is considered that the proposal is consistent with the amenity of the surrounding residential area, for the following reasons."

The proposal is a use that LPS3 allows to be approved in the Residential zone. The proposal will have a negligible impact on the surrounding roads and will comply with the Noise Regulations. The proposal will provide an additional facility to those families with young children. Given the above it is not expected that the proposal will be inconsistent with the zoning or surrounding uses."

Officer comment

No information has been provided to demonstrate a need for Child Care Centres in the area, however submissions of support do provide anecdotal (but unsubstantiated) comments that there is a demand for services in the area. LPP 206 requires applications to include information on the level of existing or proposed services in the locality, proximity to other Centres, population catchments and number of Primary School and Kindergartens in the locality and their number of students. PB 72/2009 specifies that in instances where development may have an adverse impact on amenity, further information in regard to level of existing services (as per LPP 206) can be requested for assessment. In this instance, the further information to demonstrate the need for the facility has not been provided.

Options/Alternatives:

Should the Metro West JDAP decide to approve the application, the following conditions and advice notes are recommended:

1. All development shall occur in accordance with the approved drawings (Development Application DA2019.00047), as amended by these conditions.
2. Prior to the issue of a Building Permit Lot 19 (164) Alfred Road and Lot 18 (162) Alfred Road shall be amalgamated and a Certificate of Title issued to the satisfaction of the Town of Claremont. Alternatively, the applicant may apply for amalgamation and enter into a legal agreement with the Town prior to the issue of a Building Permit to ensure amalgamation occurs within 12 months of the issue of a Building Permit. The legal agreement shall be prepared by the Town of Claremont's solicitors, with all associated cost to be paid for by the applicant, and shall be entered on the Certificate of Title as an Absolute Caveat.
3. A maximum of 65 children and 12 staff are to be accommodated on the site at any time.
4. The Child Care Centre operation shall be carried out in accordance with the Noise Management and Child Supervision Policy to the satisfaction of the Town of Claremont.
5. Any parent gatherings and meetings shall be staggered to be conducted at different times for the different age groups.
6. A minimum of 19 car parking bays are to be provided on site, and all car parking and accessways are to be no closer than 5m to any adjoining property boundary to the satisfaction of the Town of Claremont. The internal tandem car parking bay shall be marked "Staff Only".
7. The dimensions of all car parking bays, aisle widths and circulation areas complying with the Australian Standard AS/NZS 2890.1/2004.
8. A median splitter island with associated intersection geometry and changes to the pedestrian path linkages shall be constructed on Butler Avenue at the intersection with Alfred Road to improve traffic and pedestrian safety at the

intersection to the satisfaction and design requirements of the Town of Claremont at the cost of the applicant.

9. A median island shall be constructed opposite the left in only Alfred Road crossover which is to be relocated 5m to the west (and signposted as "No Exit") to prevent vehicles turning right into the crossover from the west and vehicles exiting the crossover to the satisfaction and design requirements of the Town of Claremont, at the cost of the applicant.
10. The building layout shall be redesigned so that outdoor play areas are not directly abutting the adjoining residential property boundary to the east in accordance with Town of Claremont Local Planning Policy 206 – Child Care Centres.
11. The size of the building shall be reduced to meet the requirements of the *Child Care Services (Child Care) Regulations 2006* for indoor and outdoor play areas to accommodate 65 children to the satisfaction of the Town of Claremont.
12. The construction materials of the Child Care Centre is to include all recommendations from the Acoustic Assessments, to the satisfaction of the Town of Claremont.
13. All proposed signage is to comply with Town of Claremont Local Law Relating to Signs.
14. A Waste Management and Delivery Plan shall be submitting prior to the issue of a Building Permit. All servicing and deliveries, including waste collection, for the site are to take place during the operational hours and not during peak morning drop-off or peak afternoon pick-up periods of the Child Care Centre, and limited to 10.00am to 3.00pm on weekdays to the satisfaction of the Town of Claremont.
15. Masonry fencing to a height of 2m shall be installed along the eastern and southern adjoining property boundaries.
16. All fencing along the northern and western street boundaries shall comply with the Town of Claremont Fencing Local Law 2000.
17. No building, wall, fence or landscaping greater than 0.75 metres in height, relative to the verge or footpath, is to be constructed within 1.5 metres of a vehicular access way unless such wall or fence is constructed with a 1.5 metre truncation where the driveway intersects the verge or footpath to the satisfaction of the Town of Claremont.
18. A Construction and Site Management Plan detailing access to the site, the delivery and storage of materials and the parking of tradespersons is to be approved by the Town of Claremont prior to the issue of a Building Permit and implemented for the duration of construction.
19. Street tree removal is not approved as part of this Development Approval.
20. The existing crossovers are to be removed and the verge reinstated prior to occupation of the development to the satisfaction of the Town of Claremont.
21. New crossovers are to be designed for pedestrian path to have priority to the satisfaction of the Town of Claremont.
22. Vehicle access is to be designed in such a manner as to prevent storm water entering the property from the road and footpath to the satisfaction of the Town of Claremont.

23. The external materials and colour finishes of the development are to be to a standard such that it complies with the requirements of Clauses 76 and 77 of the Town of Claremont Local Planning Scheme No. 3, to the satisfaction of the Town of Claremont.
24. All storm water is to be retained on the site. Details are to be provided on the application for Building Permit to the satisfaction of the Town of Claremont.
25. Prior to the issue of a Building Permit, a Crime Prevention Through Environmental Design audit of the proposed development inclusive of any design detail modifications.

Advice Notes:

- (i) This is not an approval to commence development. A Building Permit must be obtained from the local government's Building Services prior to the commencement of any building works.
- (ii) The applicant/owner is advised of the following health requirements from the Town's Health Services. For further information please contact the Town's Health Services on 9285 4300:
 - The development and use of the land is required to comply with the *Environmental (Noise) Regulations 1997*.
 - The applicant is required to remove any hazardous materials encountered during construction/demolition at their own expense and in accordance with the Code of Practice on Safe Removal of Asbestos (NOHSC: 2002 (1988) as stipulated by the *Occupational Health and Safety Regulations 1996*, and disposed of in accordance with the *Health (Asbestos) Regulations 1992* and the *Environmental Protection (Controlled Waste) Regulations 2004*.
 - All plant and machinery (such as air-conditioners and pool pumps) are to be suitably sound proofed to comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* and so as not to cause an adverse impact on the amenity of any adjoining residential properties.
 - Under the *Environmental Protection (Noise) Regulations 1997* no work is to be permitted or suffered to be carried out:
 - a) Before 7.00am or after 6.00pm Monday to Saturday inclusive, or
 - b) On a Sunday or on a public holiday.
- (iii) If the applicant is aggrieved by this determination a right of review may exist under the *Planning and Development Act 2005*. An application for review must be lodged with the State Administrative Tribunal (www.sat.justice.wa.gov.au) within 28 days of the determination.

Council Recommendation:

THAT Council:

- 1. Support the Officer recommendation to the Metro West Joint Development Assessment Panel that Development Approval be refused for the development of a Child Care Centre at Lots 18-19 (162-164) Alfred Road, Swanbourne for the reasons detailed in the Council report.**
- 2. Authorise the Director Planning and Development to forward a report on the application to the Metro West Joint Development Assessment Panel.**

Conclusion:

Based on the above, it is recommended that the Development Application refused for the reasons outlined by the Town of Claremont.



LG Ref: DA2019-00047
DAP Ref: DAP/19/01600
Enquiries: (08) 6551 9919

Mr Nathan Stewart
Rowe Group
Level 3, 369 Newcastle Street
Northbridge WA 6003

Dear Mr Stewart

METRO WEST JDAP - TOWN OF CLAREMONT - DAP APPLICATION - DA2019-00047 - DETERMINATION

Property Location:	Lots 18-19 (162-164) Alfred Road, Claremont
Application Details:	Child Care Centre to existing residential site

Thank you for your Form 1 Development Assessment Panel (DAP) application and plans submitted to the Town of Claremont on 18 April 2019 for the above-mentioned development.

This application was considered by the Metro West JDAP at its meeting held on 12 July 2019, where in accordance with the provisions of the Town of Claremont Local Planning Scheme No. 3, it was resolved to **refuse** the application as per the attached notice of determination.

Please be advised that there is a right of review by the State Administrative Tribunal in accordance with Part 14 of the *Planning and Development Act 2005*. Such an application must be made within 28 days of the determination, in accordance with the *State Administrative Tribunal Act 2004*.

Should you have any queries with respect to the reasons for refusal, please contact Ms Lisa Previti on behalf of the Town of Claremont on 9285 4300.

Yours sincerely,

DAP Secretariat

15 July 2019

Encl. DAP Determination Notice
Refused Plans

Cc: Ms Lisa Previti
Town of Claremont



Planning and Development Act 2005

Town of Claremont Local Planning Scheme No. 3

Metro West Joint Development Assessment Panel

Determination on Development Assessment Panel Application for Planning Approval

Property Location: Lots 18-19 (162-164) Alfred Road, Claremont
Application Details: Child Care Centre to existing residential site

In accordance with regulation 8 of the *Planning and Development (Development Assessment Panels) Regulations 2011*, the above application for planning approval was **refused** on 12 July 2019, subject to the following:

1. **Refuse** DAP Application reference DAP/19/01600 and accompanying plans Attachment 3 in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the provisions of Part V of the Town of Claremont Local Planning Scheme No. 3, for the following reasons:

Reasons

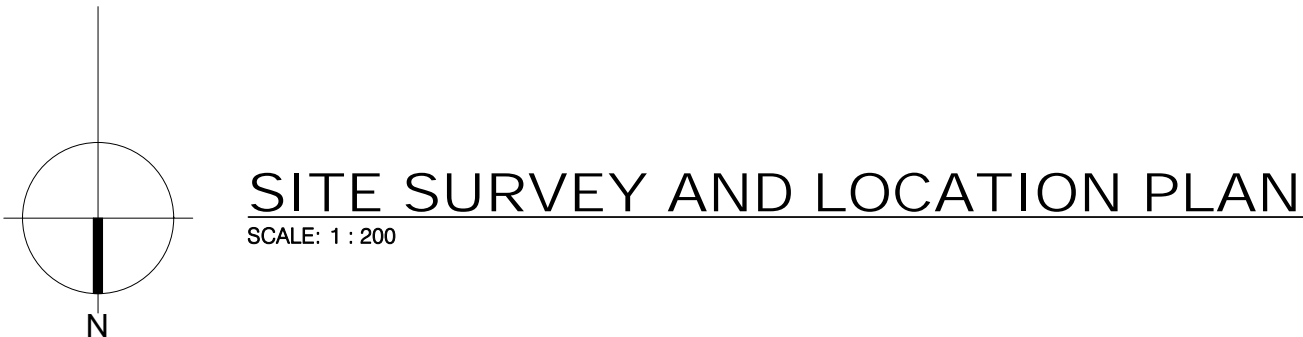
1. The proposed Child Care Centre is inconsistent with Town of Claremont Local Planning Scheme No. 3 with respect to:
 - a) Day Care Centre is an 'SA' use within Table 1 – Land Use Table. It is considered the proposal will have a detrimental impact on the amenity of residents in the locality by way of increased traffic and on street parking and the land use is therefore not considered to be an appropriate land use within the 'Residential' zone,
 - b) Clause 46(3) which requires "*the continuation of the domestic scale and architectural character of the area...*" It is considered the architectural style was not fully in keeping with the residential character of the area, and
 - c) Clause 37A – Non-Residential Development Abutting a Residential Zone including:
 - i. Clause 37A(1)(a) boundary setbacks and wall heights to the eastern and southern boundaries being closer than 6m and higher than 2m,
 - ii. Clause 37A(1)(c) internal accessway setback less than 5m from the southern boundary,
 - iii. Clause 37A(1)(d) insufficient tree planting in between car parking spaces, and
 - iv. Clause 37A(2) lack of 2m high masonry wall to the eastern and southern boundaries.
2. The proposed Child Care Centre is inconsistent with Town of Claremont Local Planning Policy 206 – Child Care Centres with respect to:



- a) Location requirements as:
 - i. The proposal is not contained within a preferred zone, nor immediately adjacent to a preferred zone,
 - ii. The proposal does not adjoining a compatible land use, the traffic increase has not been demonstrated to be suitable from an engineering view,
 - iii. The site is not of sufficient size to accommodate the development without impacting on the amenity of the surrounding area,
 - iv. Access to the site is proposed from a local access street which is likely to result in traffic, parking and associated amenity concerns, and
 - v. The proposal is located on a high traffic volume road where noise is likely to have an adverse impact on the site.
 - b) Site requirements, as the site is not of sufficient size to accommodate the development with required setbacks, parking and outdoor play areas suitably located.
 - c) Development requirements as:
 - i. The visual appearance of the development does not reflect the residential character of the area,
 - ii. The proposal has a significant parking shortfall of nine bays, which is likely to result in parking on the Butler Avenue road reserve,
 - iii. Outdoor play areas are located adjacent to residential boundaries to the east and south, and a high traffic volume road to the north,
 - iv. Masonry fencing has not been provided to the adjoining residential property boundaries to the east and south,
 - v. The Traffic Impact Statement does not take into consideration the locational circumstances of the site. It is likely the increase in traffic will have a detrimental impact on levels of service for the Alfred Road and Butler Avenue intersection, and on the nearby road network and intersections,
 - vi. Access is proposed from Butler Avenue which is a short no-through Access Road and is likely to have a detrimental impact on the amenity of residents and locality,
 - vii. The Acoustic Assessment does not address the impact of external noise sources on the proposed Child Care Centre,
 - viii. Outdoor play areas are located adjacent to boundaries with residential properties, which may have a negative impact on the adjoining residents, and
 - ix. The introduction of a commercial Child Care Centre into the predominantly residential area will likely have a detrimental impact on the amenity of the locality in regards to traffic and parking, and consequent safety issues.
3. The development's size, scale, layout and intensity of use, including hours of operation, is not considered compatible with the residential amenity, and the planning framework.

REFUSED

12-Jul-2019



CHILD CARE CENTRE
LOCATION: 162 & 164 ALFRED ROAD, SWANBOURNE
FOR: SHARON PROPERTY PTY. LTD.

SK004
FEB 2019
1 of 5
1 : 200 @ B1

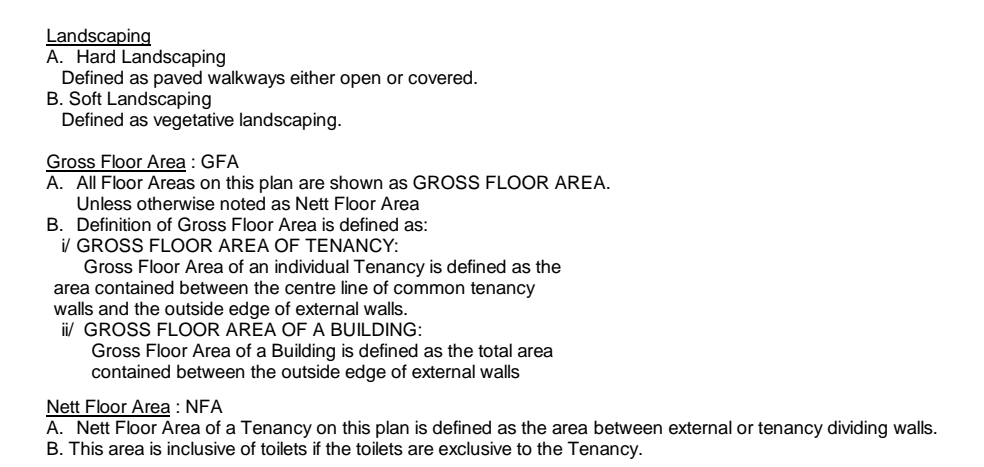
8437

Member
Australian Institute
of Architects
meyer
shircore
and associates
ARCHITECTS
1963 | 2013
© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor, 437 Roberts Road Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 f: 08 9388 1339

REFUSED
12-Jul-2019

- a. REQUIRED
 - i. 1 PER STAFF
 - ii. 1 PER 10 CHILDREN
- b. PROVIDED
 - i. STAFF
 - ii. VISITORS

TOWN OF CLAREMONT
REVISED PLANS
RECEIVED 30 MAY 2019



ALFRED ROAD

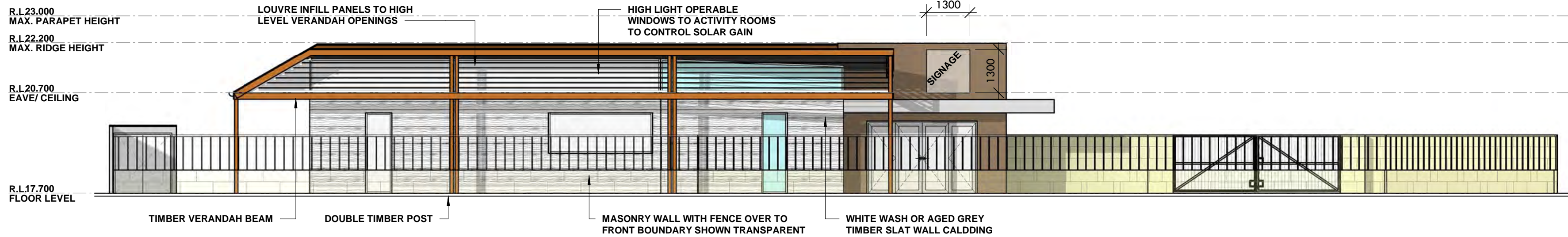
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FEB 2019
2 of 5
1 : 100 @ B1

8437

 **meyer**
shircore
and associates
ARCHITECTS

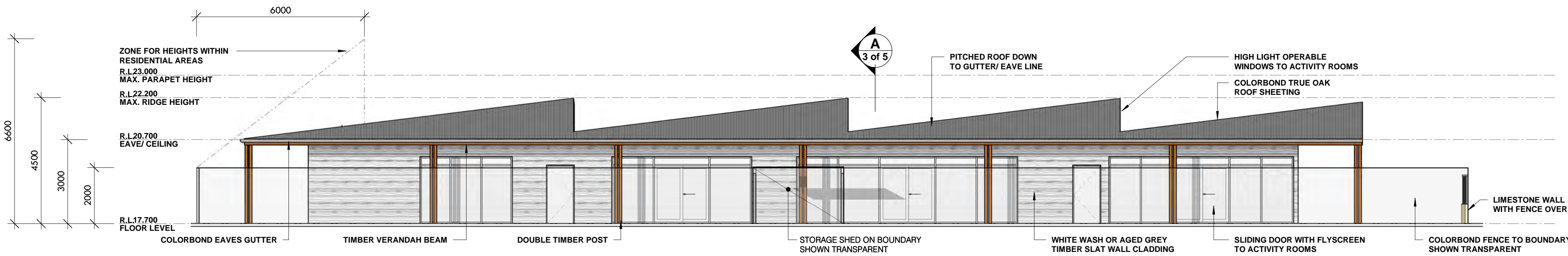
50 YEARS
1963/2013

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PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 f: 08 9388 1339



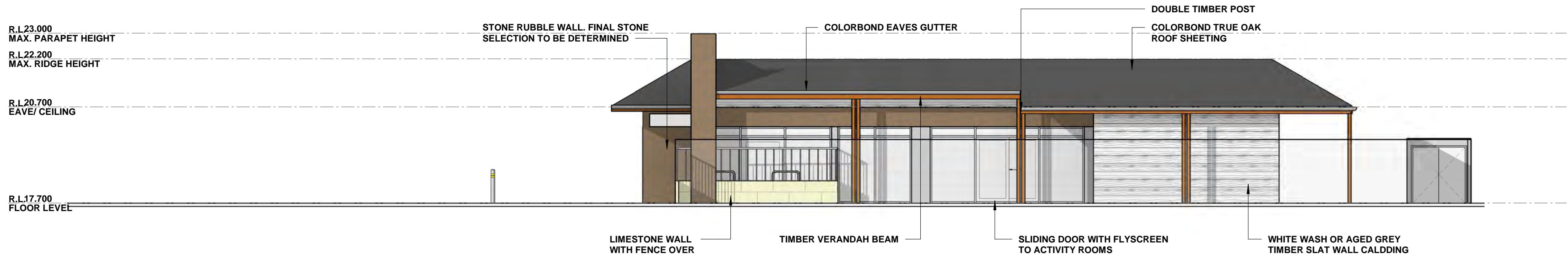
NORTH ELEVATION

SCALE: 1:100



EAST ELEVATION

SCALE: 1:100



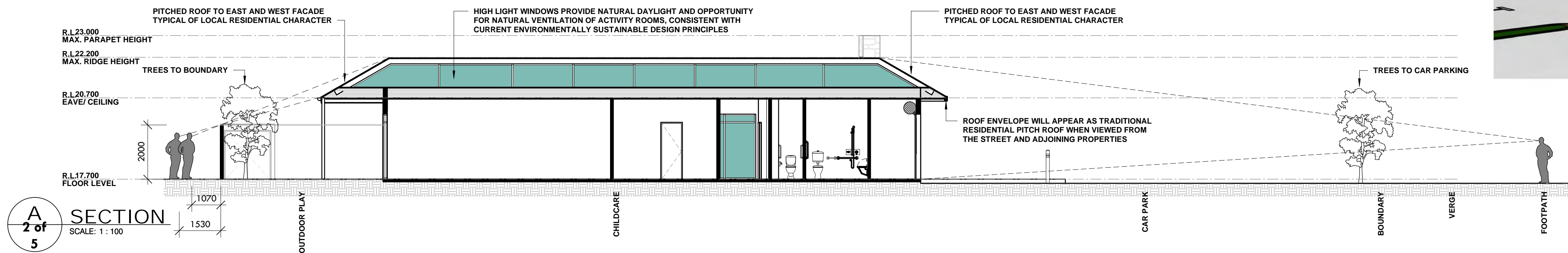
SOUTH ELEVATION

SCALE: 1:100



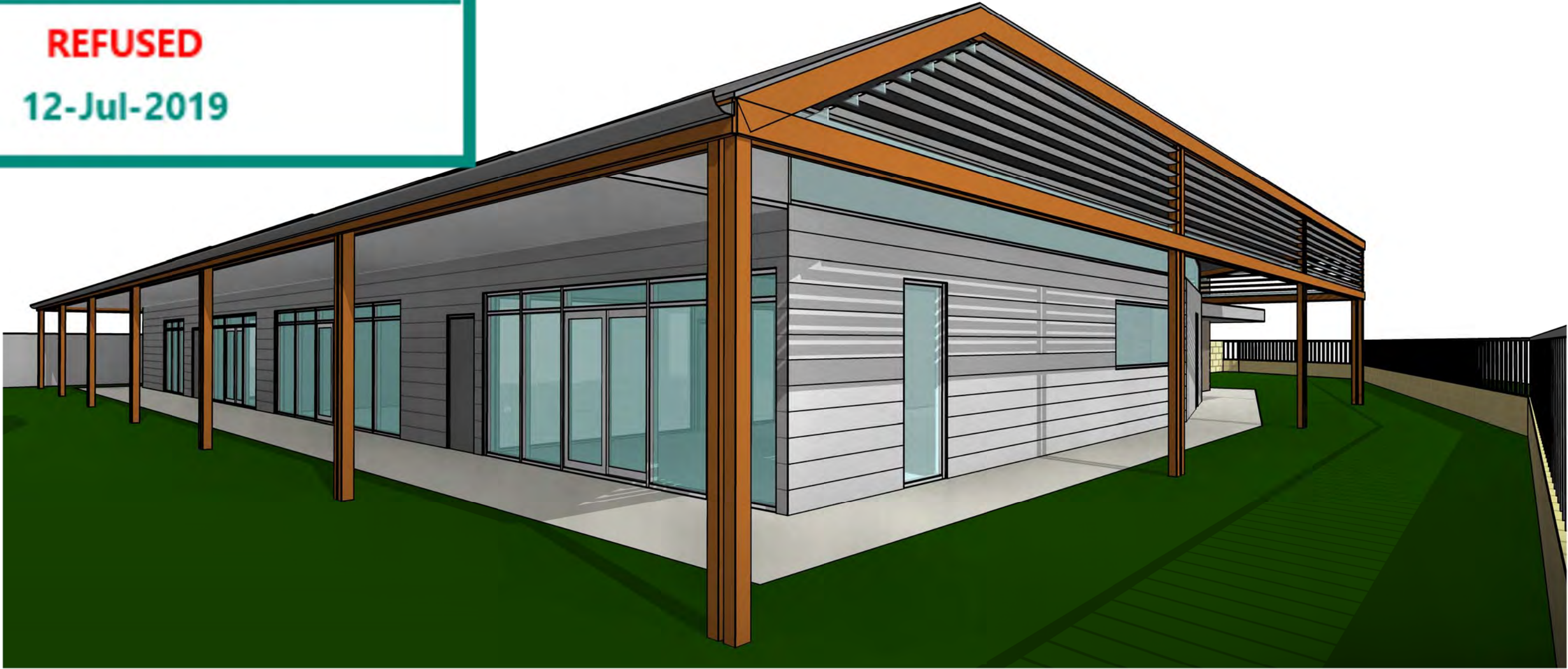
WEST ELEVATION

SCALE: 1:100



SECTION

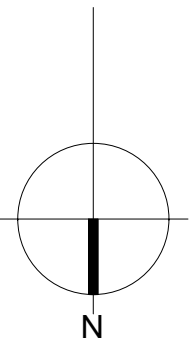
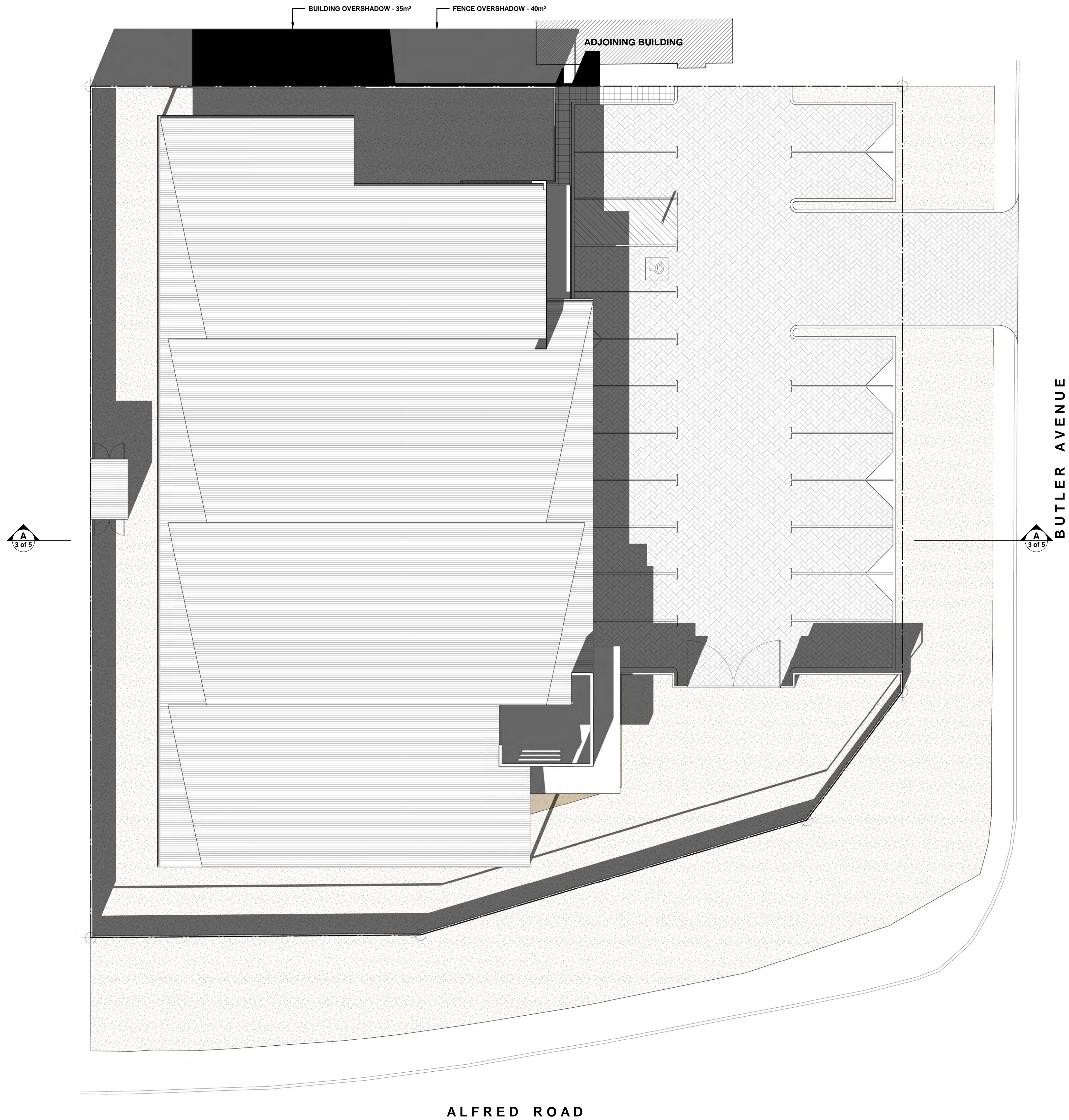
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BUTLER AVE

REFUSED

12-Jul-2019

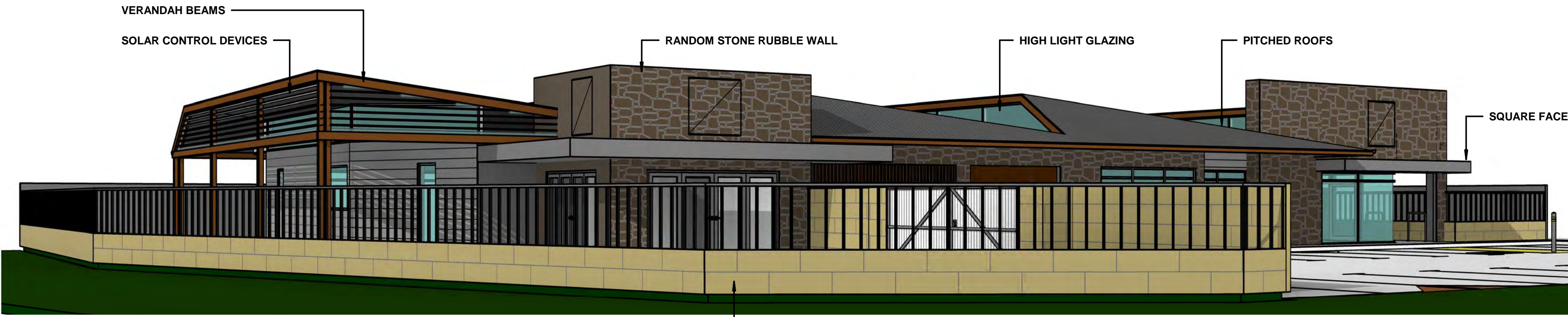


OVERSHADOW DIAGRAM
SCALE: 1:100

CHILDCARE CENTRE
LOCATION:162 & 164 ALFRED ROAD, SWANBOURNE
FOR:SHARON PROPERTY PTY. LTD.

SK004
FEB 2019
4 of 5
1:100 @ B1

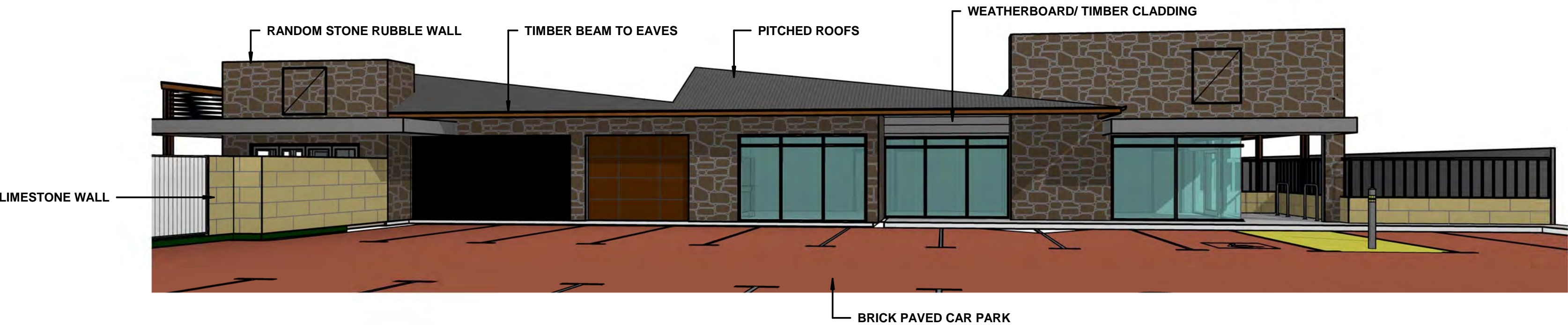
8437



CORNER ALFRED RD AND BUTLER AVE
SCALE:



VIEW FROM EASTERN PROPERTY
SCALE:



VIEW FROM BUTLER AVENUE
SCALE:

PHOTOGRAPHS OF LOCAL RESIDENTIAL CHARACTER



Location & Submission Plan – 162-164 Alfred Road, Swanbourne Child Care Centre - Consultation Area



OBJECTIONS ● SUPPORT ● RECEIVED OFF MAP

MT CLAREMONT ●
Mayfair Street 18, 31, 44, 45, 54, 55b, 59, 64 +2 no number
Rochdale Road 16, 149
Lisle Street 3, 34, 35 + 1 from Lisle Villages
Strickland Street 22, 40, 40A, 59 + no number given
62 Adderly Street
Finch Way no number given

Address not given - 9 Objections ● 22 support ●

SWANBOURNE ●
11a Cornwall Street
33 Fern Street
Swanway Crescent 23, 25, 26
Nidjalla Loop 1, 4, 8
8 Narla Road x 2 submissions
7 Milyarm Rise

61 Strickland + 1 no number ●
Alfred Road 136A ●

COTTESLOE ●
47 Griver ●

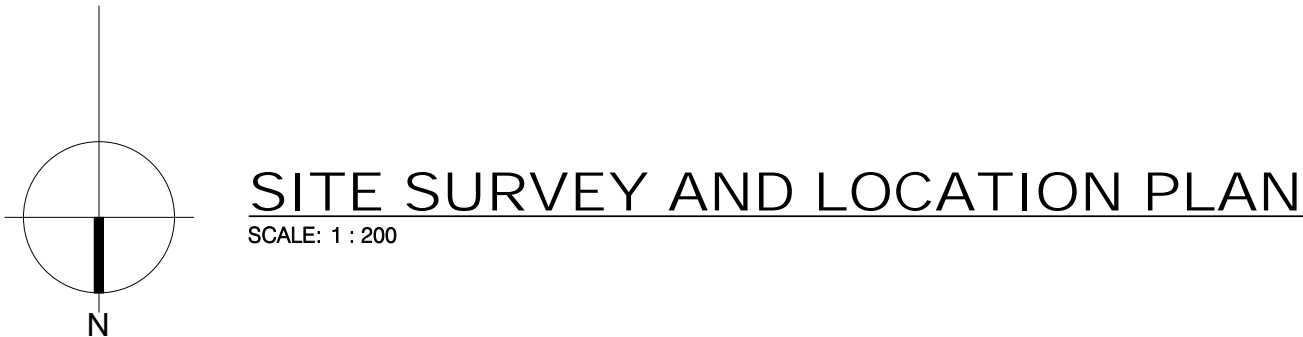
Lots 18 & 19 (162-164) Alfred Road, Claremont



Lot 19 (162) Alfred Road, Claremont



Lot 18 (164) Alfred Road, Claremont



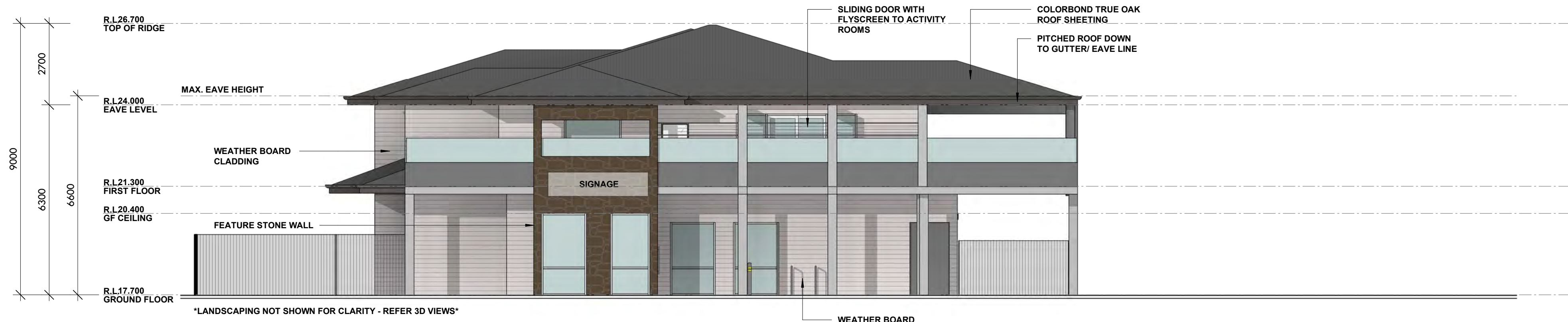
CHILDCARE CENTRE
LOCATION:162 & 164 ALFRED ROAD, SWANBOURNE
FOR:SHARON PROPERTY PTY. LTD.

SK012
OCT 2019
1
1 : 200 @ B1

8437

meyer shircore 55 YEARS
architects 1963|2018
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PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au





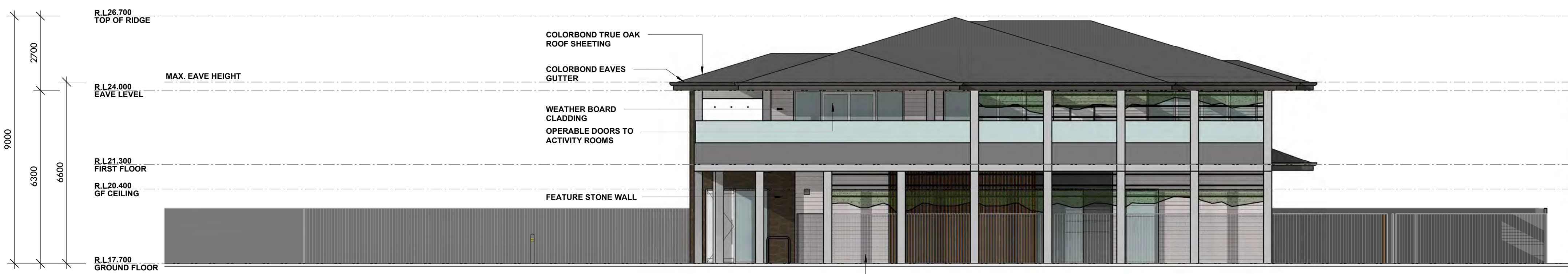
NORTH ELEVATION
SCALE: 1:100



EAST ELEVATION
SCALE: 1:100



SOUTH ELEVATION
SCALE: 1:100



WEST ELEVATION
SCALE: 1:100



VIEW FROM BUTLER AVE
SCALE: 1:100



SOME TREES IN LANDSCAPE BUFFER ZONE NOT SHOWN FOR CLARITY



PHOTOGRAPHS OF LOCAL RESIDENTIAL CHARACTER



IMAGE 1



IMAGE 2



IMAGE 3



IMAGE 4



IMAGE 5



IMAGE 6



IMAGE 7



IMAGE 8

Job Ref: 8981
21 November 2019

Chief Executive Officer
Town of Claremont
PO Box 54
CLAREMONT WA 6910

Sent via email to: lpreviti@claremont.wa.gov.au

Attention: Ms Lisa Previti – Manager Statutory Planning and Building

Dear Madam

**REVISED PLANS AND ADDITIONAL INFORMATION
SHARON PROPERTY PTY LTD AND PRESIDING MEMBER OF METRO WEST
JOINT DEVELOPMENT ASSESSMENT PANEL**

Rowe Group acts on behalf of the landowner of Lots 18 and 19 (No. 162-164) Alfred Road, Claremont ('the subject site') in relation to DR 161 of 2019, Sharon Property Pty Ltd and the Presiding Member of the Metro West Joint Development Assessment Panel ('the SAT Matter'). We write in relation to the 16 October 2019 mediation ('the October Mediation') and 6 November 2019 mediation ('the November Mediation') held at the State Administrative Tribunal ('the Tribunal') in which representatives of the Town of Claremont ('the Town'), the Department of Planning, Lands and Heritage, the Presiding Member of the Metro West Joint Development Assessment Panel ('JDAP'), State Solicitors Office and the Applicant were present.

As per the 6 November 2019 Tribunal Orders, the Applicant is to provide revised plans and additional information to the Town by 21 November 2019. The revised material will be assessed by the Town and presented to the JDAP for reconsideration in January 2020.

Please find enclosed the following revised material:

- Revised floor and elevation plans of the proposed development;
- A Revised Traffic Report prepared by Transcore addressing traffic matters;
- A revised Acoustic Report assessing the proposed modified development against the *Environmental Protection (Noise) Regulations 1997* and a Traffic Noise Ingress Acoustic Assessment;



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Western Australia

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info@rowegroup.com.au
rowegroup.com.au

- A Noise Management and Child Supervision Policy detailing how children will be supervised and when children will be using outdoor play spaces; and
- The following additional information.

PROPOSED MODIFICATIONS

The proposal includes the following modifications to the proposed development considered by the JDAP at its 12 July 2019 meeting:

- The number of children has reduced from 90 to 65.
- The number of staff has reduced from 13 to 12.
- Operation hours remain unchanged.
- The number of parking bays has reduced from 20 to 19. The revised proposal is consistent with the car parking requirement of one (1) bay per five (5) children, plus 0.5 bay per staff contained in the Town's Local Planning Policy No. 206 – Child Care Centres ('LPP 206').
- The proposal has changed from a single storey building to a two (2) storey building with a smaller footprint. The original single storey proposal had a footprint of approximately 624m² (approximately 33% of the site area). The proposed two (2) storey proposal has a footprint of 328m² (approximately 17.7% of the site area). The overall building size and footprint area is less than a number of dwellings in the locality. It is important to note that the building is set within the equivalent of two (2) lots.
- The roof profile has changed from a hybrid skillion roof / pitched roof to a traditional pitched roof constructed of colorbond consistent with other dwellings in the surrounding area.
- The outdoor playspace is proposed along the southern and eastern portions of the subject site. Landscaping will be planted along the southern and eastern lot boundaries of the subject site, consistent with Clause 37A(3) of the Town's Town Planning Scheme No. 3 ('TPS 3'). Additional landscaping and playspace equipment will be located throughout the outdoor playspace. This will be subject to a detailed landscape plan post-approval.
- A 6m wide landscape area, which is not to be used as outdoor playspace, is proposed along the southern boundary.
- Outdoor playspace is also provided on the first floor fronting Alfred Road and Butler Avenue. This outdoor playspace on the first floor is screened on the southern and eastern elevations from the adjoining residential properties, consistent with Clause 37A(1)(b) of TPS 3.
- First floor windows on the southern and eastern elevations of the proposed building will be obscured and inoperable, consistent with Clause 37A(1)(b) of TPS 3.
- The proposed building is set back 6m from the eastern boundary and 10m to 11m from the southern boundary. This is consistent with the setback requirements contained under Clause 37A(1)(a)(i) of TPS 3.
- The single storey proposal included car parking bays within approximately 0.5m of the southern lot boundary. The Town has interpreted Clause 37A(1)(c) of TPS 3 as meaning no accessway and parking being within 5m of 'Residential' Zoned land. We disagree with this interpretation of Clause 37A(1)(c) of TPS 3. We are of the view Clause 37A(1)(c) of TPS 3 refers to accessways (or crossovers) only, not internal vehicle

access areas. However, we have modified to plans by setting the car parking bays approximately 5m back from the adjoining residential properties to the east and south of the subject site. This means the two (2) storey proposal to be consistent with the Town's interpretation of this setback requirement.

- Shade trees within the car parking area every three (3) bays, consistent with Clause 37A(1)(d) of TPS 3.
- Vehicle access to the subject site for the single storey proposal was via a single crossover from Butler Avenue. The two (2) storey proposal includes two (2) vehicle access points, one from Butler Avenue and one from Alfred Road. The Butler Avenue crossover remains unchanged from the original proposal. The Alfred Road crossover is designed to permit left-in movements only. A Revised Traffic Report has been prepared by Transcore containing its assessment of this proposed access and this is enclosed to this advice (Attachment 2).
- The original single storey proposal included a colorbond fence along the southern and eastern boundaries. The two (2) storey proposal replaces the colorbond fence with a solid masonry fence. Advice we have received from our acoustic consultant, Herring Storer Acoustics, confirms a colorbond fence would have ensured compliance with the noise level requirements under the *Environmental Protection (Noise) Regulations 1997* ('Noise Regulations'). The proposed solid masonry fence will further attenuate noise within the property. In addition, a masonry fence is in keeping with the character of the existing residential properties on Butler Avenue and Alfred Road.

Refer Attachment 1 – Revised Plans.

In addition to the above, the built form of the two (2) storey proposal has been designed to reflect the character of a single dwelling. The building incorporates a traditional pitched roof profile, which when viewed from Butler Avenue, will have the appearance of a single house. This is assisted by the small footprint of the building (i.e. equivalent to that of a single house). The car park will be brick paved to a similar standard of other residential properties in Butler Avenue. The existing trees within the verge area will be retained and additional planting will be provided. Additional landscaping is proposed between the car parking area and the western and northern lot boundaries. Therefore, it is our view the proposed development is designed to reflect the character of the surrounding residential area.

FURTHER TRAFFIC INVESTIGATIONS

As agreed at the November Mediation, Transcore has undertaken further investigation and traffic modelling of the proposed development. This includes remodelling of the traffic generated by the proposed development based on the revised children and staff numbers and Alfred Road and Butler Avenue access arrangements.

Refer Attachment 2 – Revised Traffic Report.

The Revised Traffic Report demonstrates the traffic operations of the road network in the vicinity of the proposed development would not be adversely impacted by the associated additional traffic.



FURTHER ACOUSTIC INVESTIGATIONS

As agreed at the November Mediation, Herring Storer Acoustics has undertaken further investigations and noise modelling of the proposed development. This includes confirming the revised development complies with the Noise Regulations, undertake actual noise readings from traffic noise on Alfred Road and a noise ingress assessment from road traffic noise associated with Alfred Road. In addition, a Noise Management and Child Supervision Policy has been prepared by the child care centre operator. The noise modelling by Herring Storer Acoustics has been undertaken on the basis of the Noise Management and Child Supervision Policy.

Refer Attachment 3 – Revised Acoustic Report and Traffic Noise Ingress Acoustic Assessment and Attachment 4 – Noise Management and Child Supervision Policy.

The Revised Acoustic Report demonstrates the proposal complies with the *Environmental Protection (Noise) Regulations 1997* ('Noise Regulations').

AMENITY IMPACT

In respect to the amenity impact from the proposal, noise and traffic impacts must be considered. In this regard, the proposal causes no detrimental amenity impact from noise or traffic perspectives and the visual appearance of the development. In addition, the amenity of an area is also defined by the availability of and proximity to essential services.

Noise

When buying a property within the 'Residential' Zone in the Town of Claremont, it should be expected that some non-residential uses (such as a child care centres, home offices, small shops, etc.) are capable of being approved within the 'Residential' Zone. Child care centres are located within residential areas across Perth. This is not an unusual type of development within the 'Residential' Zone. As such, there is the possibility of such non-residential uses being approved and developed on an adjoining property and this should be expected.

Noise from children playing outdoors is a regular occurrence in the backyards of residential properties and is a type of noise which is to be expected in and associated with residential areas. The requirement for outdoor play areas will result in children playing outside as part of this proposal. Therefore, what is being proposed will not generate a noise unusual in this setting.

Efforts have been made as part of this proposal to ensure the attenuation of noise. A solid 2m high masonry fence is proposed along the southern and eastern boundaries of the subject site. A large landscaped area is proposed to be situated between the outdoor play space and the southern boundary. Whilst this landscaped area is not required in order to ensure compliance with the Noise Regulations, it will assist in providing some separation between the outdoor play space and the outdoor living area on adjoining property to the south. In addition, the outdoor play space will be used in accordance with a Noise Management and Child Supervision Policy. The Noise Management and Child Supervision Policy outlines when groups of children will play outside

and in which area of the outdoor play space. This will be implemented by staff of the child care centre and will minimise noise in the outdoor play space areas.

On the basis of the above, there will not have an adverse amenity impact caused by noise generated by the proposed development.

Visual Appearance

The proposed development has the appearance of a single house when viewed from Butler Avenue and Alfred Road both in terms of both scale and character. The scale of the development is similar to that of a single house within a residential area and is reflective of the scale of other residential development in the area. The proposed development has been designed purposely to reflect the character of the surrounding residential properties. Similar design elements (such as a traditional pitched roof, a balcony, vertical windows) and construction materials (such as colourbond, weatherboard, feature stone walls, masonry) from the surrounding area have been incorporated into the proposed development to ensure this consistency.

The footprint of the proposed development is approximately 328m². This is similar to other houses located on Butler Avenue and the wider surrounding residential area. Therefore, the proposed footprint of this development is consistent with the footprint of existing development in the area. Furthermore, the footprint of the proposed development is considered to be lesser as the development is across two (2) lots, with a combined site area of approximately 1,860.6m². This means the site coverage is approximately 17.6% which is considerably lower than all other development in the area.

The outdoor play spaces are not visible from the adjoining properties to the south and east of the subject site. Furthermore, a large landscaped area is proposed to be situated between the outdoor play space and the southern boundary. This will provide a buffer between the proposed development and the property to the south. Therefore, children playing in the outdoor play spaces will not have any visual impact on the adjoining properties.

On the basis of the above, the proposal will have no adverse impact on amenity, but rather represents a well landscaped building that has considerable setbacks to the adjoining properties. It is considered that the proposal will positively contribute to the amenity of the area.

Traffic

Vehicles coming to and from a property is not unusual in a residential area. Likewise, parents and children getting into and out of cars at a property in a residential area is not unusual. In addition, waste collection in residential areas is undertaken on a weekly basis. Therefore, waste collection vehicles which would come to and from the subject site on an infrequent but regular basis is also not unusual within residential areas. Therefore, the types of vehicle movements associated with the proposed development are to be expected.



In relation to the vehicle movements associated with this development, it is expected that vehicles will always turn right when exiting the subject site in order to get to Alfred Road as Butler Avenue is a cul-de-sac street. Therefore, the proposal will not cause an undue impact on the properties on Butler Avenue.

In terms of the impacts on the intersection of Butler Avenue and Alfred Road, Transcore's traffic modelling confirms as follows:

- Depending on the post development movement, the number of queued vehicles on Butler Avenue turning left onto Alfred Road would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (less than 1 second);
- Depending on the post development movement, the number of queued vehicles on Butler Avenue turning right onto Alfred Road would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (i.e. 5 and 2 seconds during AM and PM peak, respectively);
- Depending on the post development movement, the number of queued vehicles on Alfred Road turning right into Butler Avenue would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (less than 1 second).

Based on the traffic modelling, the impact of the proposal on the existing traffic movements associated with the existing Butler Avenue residential properties is minor with no significant impact to the queuing length of the vehicles or delay time for vehicles waiting to turn onto Butler Avenue from Alfred Road or onto Alfred Road from Butler Avenue. Therefore, the proposed development will have a negligible impact on the how residents access their property on Butler Avenue. Thus, no amenity impact from the traffic generated by this proposal.

The subject site is considered to be well located within the residential catchment and will provide a service needed by the local residents. Accordingly, the proposal will positively impact on the overall amenity and the proximity to essential services of the area.

Availability of and Proximity to Essential Services

Essential services provide a function which allows community cohesion. The proximity to these services improves walkability, streetscape and overall amenity of residential communities. Likewise, the lack of essential services reduces amenity in these communities. Child care centres are considered an essential service.

As previously mentioned, the proposal will positively contribute to the amenity of the area by providing a much needed and essential service within the locality. The subject site is considered to be well located within a well-established residential catchment, along a key transport route and with the availability of public transport, footpaths, signalised pedestrian crossings, parks and schools. Therefore, the proposal will improve the proximity to essential services within this residential catchment.

On this basis, the proposal will improve the availability of and proximity to an essential service in this locality.



SUMMARY

In light of the above, and the enclosed supporting material we request the Town of Claremont recommend the Metro West Joint Development Assessment Panel favourably reconsider this Application.

Should you require any further information or clarification in relation to this matter, please contact the undersigned on 9221 1991.

Yours faithfully,

Nathan Stewart

Rowe Group

CC. Client

CC. State Administrative Tribunal

CC. Development Assessment Panel Secretariat

Encl.

Attachment 1 – Revised Plans

Attachment 2 – Revised Traffic Report

Attachment 3 – Revised Acoustic Report and Traffic Noise Ingress Acoustic Assessment

Attachment 4 – Noise Management and Child Supervision Policy



Proposed Childcare Centre

**Lots 18 (164) & 19 (162) Alfred
Road, Swanbourne**

Transport Impact Statement - Revised

**PREPARED FOR:
Rowe Group**

November 2019

Document history and status

Author	Revision	Approved by	Date approved	Revision type
Shaju Maharjan	r01	B Bordbar	19/03/2019	Draft
Shaju Maharjan	r01a	B Bordbar	2/04/2019	Final
Shaju Maharjan	r01b	B Bordbar	9/04/2019	1 st Revision
Behnam Bordbar	r02	R White	14/11/2019	2 nd Revision
Behnam Bordbar	r02a	R White	19/11/2019	3 rd Revision
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TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	PROPOSED DEVELOPMENT	3
3.0	VEHICLE ACCESS AND PARKING.....	4
3.1	ACCESS.....	4
3.2	PARKING DEMAND AND SUPPLY.....	4
4.0	PROVISION FOR SERVICE VEHICLES	5
5.0	HOURS OF OPERATION	6
6.0	DAILY TRAFFIC VOLUMES AND VEHICLE TYPES	7
6.1	TRAFFIC GENERATION/DISTRIBUTION.....	7
6.2	TRAFFIC FLOW	8
6.3	IMPACT ON SURROUNDING ROADS.....	9
6.4	IMPACT ON LOCAL INTERSECTIONS.....	10
7.0	TRAFFIC MANAGEMENT ON THE FRONTAGE STREETS.....	13
8.0	PUBLIC TRANSPORT ACCESS.....	16
9.0	PEDESTRIAN ACCESS.....	17
10.0	CYCLE ACCESS	18
11.0	SITE SPECIFIC ISSUES	19
12.0	SAFETY ISSUES.....	20
13.0	CONCLUSIONS.....	21

REPORT FIGURES

Figure 1: Location of the subject site	2
Figure 2. Estimated traffic movements for the subject development – morning peak, afternoon peak and total daily trips (Option 30/70)	9
Figure 3. Estimated traffic movements for the subject development – morning peak, afternoon peak and total daily trips (Option 70/30)	9
Figure 4. Northbound view along Butler Avenue in the vicinity of subject site	13
Figure 5. Southbound view along Butler Avenue towards Alfred Road intersection	13
Figure 6. Eastbound view along Alfred Road from Butler Avenue intersection.....	14
Figure 7. Westbound view along Alfred Road from Butler Avenue intersection.....	14
Figure 8: Existing bus services (source: TransPerth).....	16
Figure 9: Extract from Perth Bicycle Network (Department of Transport)	18

REPORT TABLES

Table 1. Crash history for the Alfred Road/Butler Avenue intersection	15
Table 2. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday AM peak period (Existing situation).....	25
Table 3. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday PM peak period (Existing situation)	25
Table 4. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday AM peak period (Post development 30/70 option)	26
Table 5. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday PM peak period (Post development 30/70 option).....	26
Table 6. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday AM peak period (Post development 70/30 option)	27
Table 7. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday PM peak period (Post development 70/30 option).....	27
Table 8. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday AM peak period (Existing situation)	28
Table 9. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday PM peak period (Existing situation)	28
Table 10. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday AM peak period (Post development 30/70 option)	29
Table 11. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday PM peak period (Post development 30/70 option)	29
Table 12. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday AM peak period (Post development 70/30 option)	30
Table 13. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday PM peak period (Post development 70/30 option)	30
Table 14. SIDRA results for the Alfred Road Crossover – weekday AM peak period (Post development 30/70 option)	31
Table 15. SIDRA results for the Alfred Road Crossover – weekday PM peak period (Post development 30/70 option)	31
Table 16. SIDRA results for the Alfred Road Crossover – weekday AM peak period (Post development 70/30 option)	31

Table 17. SIDRA results for the Alfred Road Crossover – weekday PM peak period (Post development 70/30 option)32

APPENDIX A – PROPOSED REVISED DEVELOPMENT PLAN

APPENDIX B – SIDRA OUTPUTS

APPENDIX C – TURN PATH PLANS

APPENDIX D – SISD SIGHTLINE ASSESSMENT PLAN

1.0 Introduction

In April 2019 Transcore prepared a Transport Impact Statement report with respect to the proposed childcare centre to be located at Lots 18 (164) & 19 (162) Alfred Road, Swanbourne, Town of Claremont (2019 TIS).

The originally proposed development contemplated a childcare centre (CCC) accommodating a total of 90 children (various age groups) and 13 staff. A total of 20 on-site parking bays (including one ACROD) were proposed for the development comprising 11 staff and 9 parent/visitor bays. The development access system comprised single, full-movement crossover on Butler Avenue.

The proposal was rejected at the MWJDAP meeting held on 12 July 2019 in line with the RAR recommendations citing a number of reasons including car park design, traffic, parking and amenity. Following a SAT Mediation process, the applicant has agreed to prepare a revised application addressing the reasons of refusal.

Accordingly, the intention of the now revised childcare centre proposal is to address the issues identified by the MWJDAP through the redesign of the original site plan, reduction in children enrolments and staff numbers, revised access/egress system and upgrade of the adjacent Alfred Road/Butler Avenue intersection to incorporate a pedestrian crossing facility. Hence, an update to the April 2019 TIS is necessitated by the proposed reduction in maximum enrolment numbers and proposed modifications to the access/egress system. This revised Transport Impact Statement now addresses the revised development proposal and includes additional capacity assessments of the key local intersections of Alfred Road/Rochdale Road/Myera Street and Alfred Road/Butler Avenue, as requested by the Town.

The subject site is located at the northwest corner of the existing Alfred Road/Butler Avenue intersection as shown in **Figure 1**.

The Transport Impact Assessment Guidelines (WAPC, Vol 4 – Individual Developments, August 2016) states: *“A Transport Impact Statement is required for those developments that would be likely to generate moderate volumes of traffic¹ and therefore would have a moderate overall impact on the surrounding land uses and transport networks”*. Section 6.0 of Transcore’s report provides details of the estimated trip generation for the proposed development. Accordingly, as the total peak hour vehicular trips are estimated to be less than 100 trips, a Transport Impact Statement is deemed appropriate for this development.

The subject site (approximately 1850.5m² in size) is bounded by Butler Avenue to the west, Alfred road to the north, a vacant land to the east and existing residential dwelling to the south. Vehicle access and egress to the childcare centre is proposed via a single crossover on Butler Avenue.

¹ Between 10 and 100 vehicular trips per hour

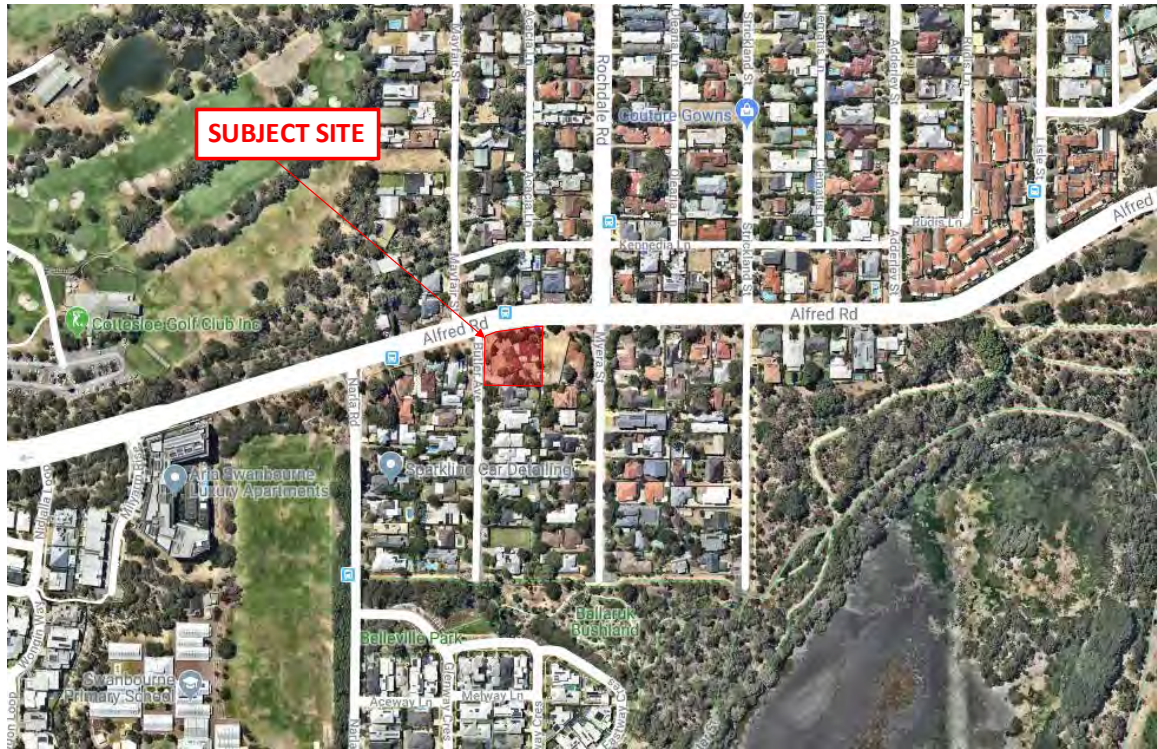


Figure 1: Location of the subject site

It is advised that the childcare centre would cater for 65 children with a total of 12 staff.

The key issues that are addressed in this report include the traffic generation and distribution of the proposed development, parking, access and egress movement patterns and capacity assessment of local intersections.

2.0 Proposed Development

The development proposal is for a childcare centre to be located at Lots 18 (164) & 19 (162) Alfred Road, Swanbourne, in the Town of Claremont.

The revised proposal for the subject site is for a childcare centre comprising the following elements:

- ✚ Double-storey child care centre building;
- ✚ Outdoor playing areas; and,
- ✚ On-site car park providing 19 car bays including one ACROD bay.

The child care centre is anticipated to accommodate up to 65 children and 12 staff.

The revised access system proposed to serve the development comprises:

- ✚ A full-movement crossover on Butler Avenue, approximately 35m south of Alfred Road intersection; and,
- ✚ A left-in only crossover on Alfred Road, approximately 40m west of Alfred Road/Rochdale Road/Myera Street traffic signals.

An undercroft bicycle parking area with two bike rails is provided at the south west corner of the CCC building.

Bin store is located on the southeast side of the building adjacent to the car park for easy collection on specified days.

The pedestrian access to the childcare centre is available directly from Butler Avenue and Alfred Road frontages via existing path network on surrounding roads.

Refer to **Appendix A** for plans of the proposed development.

3.0 Vehicle Access and Parking

3.1 Access

According to the revised plans prepared by Meyer Shircore & Associates, the proposed car park would be serviced via a single full-movement crossover on Butler Avenue and a left-in only crossover on Alfred Road leading directly into the car park area. The proposed Butler Avenue crossover to the childcare centre is proposed to be 6.0m wide while the in-only crossover on Alfred Road is proposed to be 4.0m wide.

3.2 *Parking Demand and Supply*

Based on the advice provided to Transcore the parking requirements applicable for the revised proposed childcare centre is 1 space per 5 children for visitors and 0.5 space per each employee where on-street parking is not available.

On-street parking is presently permitted on Butler Avenue. Furthermore, as Butler Avenue is 8.5m wide (kerb to kerb), which according to WAPC Liveable Neighbourhoods Policy classifies it as Access Street C - most common residential street type, on-street parking is desirable and recommended as a speed-control measure. Accordingly, Butler Avenue is clearly designed to accommodate on-street parking and as such there is no requirement to provide additional staff parking at a rate of 0.5 bays/employee. However, the proponent has agreed to provide the additional parking bays in order to be compliant with the Town's LPP No. 206 – Child Care Centres.

Accordingly, the total parking requirement equates 19 parking bays, 13 bays for visitors and 6 bays for staff.

The subject childcare provides 6 car bays for staff and 13 bays for visitors which is a total of 19 on-site car parking bays (including one ACROD) and meets the parking requirement for the proposed development. There is one pair of tandem bays with the rest being single parking bays. The tandem bays will be allocated to staff.

4.0 Provision for Service Vehicles

No specific provision is made for service vehicles within the site as it is anticipated that the proposed development will only generate a small volume of service vehicle traffic, primarily associated with deliveries for the childcare centre.

The waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors.

In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose.

5.0 Hours of Operation

The proposed childcare centre is expected to operate during weekdays between 6:30AM and 6:30PM with heaviest traffic movements during morning drop-off and afternoon pick-up hours, typically between 8:00-9:00AM and 4:30-5:30PM.

6.0 Daily Traffic Volumes and Vehicle Types

In order to assess the potential traffic impact from the proposed childcare centre, a traffic generation and distribution exercise was undertaken. The aim of this exercise was to estimate the traffic that would be generated by the proposed development and to establish the level of traffic increases on the surrounding road network.

6.1 Traffic Generation/Distribution

In order to establish an accurate traffic generation rate for this centre, a number of traffic count surveys undertaken by Transcore at similar centres in the Perth metropolitan area, were sourced.

Discussions with the respective centre managers revealed that the peak drop-offs and pick-ups for each of these centres occur between the hours of 7:00AM– 10:00AM and 3:00PM–6:00PM.

From the total number of children at each of the centres on the surveyed days, the following average generation rates were established for the morning and afternoon surveyed periods:

- ✚ 7:00AM–10:00AM: 1.58 trips per child (52% in/48% out); and,
- ✚ 3:00PM–6:00PM: 1.67 trips per child (47% in/53% out).

From this information, the traffic generation rate for the combined period of 7:00AM–10:00AM and 3:00PM–6:00PM was calculated as 3.25 trips per child. To convert this figure to a daily generation rate, this figure was increased to 3.5 trips per child to account for any trips outside of the surveyed times. It was assumed that the daily in and out split for vehicle trips was 50/50.

Furthermore, the following average peak hour generation rates were established from the surveys for the child care centres:

- ✚ Morning peak hour: 8:00AM–9:00AM: 0.75 trips per child (52% in/48% out); and,
- ✚ Afternoon peak hour: 4:30PM–5:30PM: 0.49 trips per child (43% in/57% out).

Comparison of the six-hour generation rates and the peak hour generation rates confirms that the distribution of traffic from these centres is spread over the peak periods and that full concentration of traffic does not occur in the peak hour. The AM peak hour represents 47% of the 3-hour AM peak period traffic generation and the typical school PM and road network PM peak hours represent 36% and 29% of the 3-hour PM peak period traffic generation, respectively. As such, childcare centres operate quite differently to schools as their peak period is spread out.

Accordingly, assuming a maximum of 65 children being present at the centre (i.e. centre operating at full capacity), the following number of trips was estimated for the proposed centre:

- ✚ AM road network peak hour: 49 trips generated (26 in/23 out);
- ✚ PM road network peak hour: 32 trips generated (14 in/18 out); and,
- ✚ Daily traffic generation: 228 trips generated (114 in/114 out).

6.2 Traffic Flow

As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar.

Hence, based on the general spatial distribution of residential developments in the immediate area, permeability of the local road network and the proposed access/egress system, the Centre's traffic distribution adopted for this analysis is as follows (hereafter Option 30/70):

- ✚ 70% to/from the residential areas east of Alfred Road; and,
- ✚ 30% to/from the residential areas west of Alfred Road.

Figure 2 illustrates trip generation and traffic distribution over the local road network for the proposed Centre for Option 30/70.

As a sensitivity analysis, as requested by Town, Transcore also analysed a reverse distribution (hereafter Option 70/30):

- ✚ 30% to/from the residential areas east of Alfred Road; and,
- ✚ 70% to/from the residential areas west of Alfred Road.

Figure 3 illustrates trip generation and traffic distribution over the local road network for the proposed Centre for Option 70/30.



Figure 2. Estimated traffic movements for the subject development – morning peak, afternoon peak and total daily trips (Option 30/70)



Figure 3. Estimated traffic movements for the subject development – morning peak, afternoon peak and total daily trips (Option 70/30)

6.3 Impact on Surrounding Roads

The WAPC *Transport Impact Assessment Guidelines* (2016) provides guidance on the assessment of traffic impacts:

“As a general guide, an increase in traffic of less than 10 percent of capacity would not normally be likely to have a material impact on any particular section of road, but increases over 10 percent may. All sections of road with an increase greater than 10 percent of capacity should therefore be included in the analysis. For ease of assessment, an increase of 100 vehicles per hour for any lane can be considered as equating to around 10 percent of capacity. Therefore, any section of road where the development traffic would increase flows by more than 100 vehicles per hour for any lane should be included in the analysis.”

From **Figure 2** and **Figure 3** it can be seen that the largest traffic increases during the peak hour of operation will be in order of 34vph on Alfred Road, hence the anticipated impact on the surrounding road network will not be significant and would be well within the capacity and function of the relevant roads.




6.4 Impact on Local Intersections


Capacity assessment was undertaken for the existing and post-development stages (both 30/70 and 70/30 options as agreed through SAT mediation) to ascertain the impact of the development on the operation of Alfred Road/Rochdale Road/Myera Street and Alfred Road/Butler Avenue intersections.

For the purpose of this assessment turn count surveys were undertaken at the two intersections during the combined development peak traffic activity and peak road network morning and afternoon peak activity periods (8:00-9:00AM and 4:30PM-5:30PM) on 21st October 2019. These counts were combined with Alfred Road/Rochdale Road/Myera Street SCATS data for the same peak periods in order to establish the existing traffic patterns.

The detailed capacity analysis of centre's crossover on Butler Road was not undertaken as combination of traffic volumes at the crossover and on Butler Road is well below the potential capacity thresholds. Similarly, as Alfred Road crossover is proposed to operate as inbound only and as such capacity will not be an issue here.

SIDRA NETWORK modelling was undertaken for the existing and post development scenarios for these intersections using the SIDRA computer package. This package is a commonly used intersection-modelling tool by traffic engineers for all types of intersections. SIDRA outputs are presented in the form of Degree of Saturation, Level of Service (LoS), Average Delay and 95% Queue. These items are defined as follows:

-  **Degree of Saturation:** is the ratio of the arrival traffic flow to the capacity of the approach during the same period. The Degree of Saturation ranges from close to zero for varied traffic flow up to one for saturated flow or capacity.
-  **Level of Service:** is the qualitative measure describing operational conditions within a traffic stream and the perception by motorists and/or passengers. In general, there are 6 levels of service, designated from A to F, with Level of Service A representing the best operating condition (i.e. free flow) and Level of Service F the worst (i.e. forced or breakdown flow).
-  **Average Delay:** is the average of all travel time delays for vehicles through the intersection.

 **95% Queue:** is the queue length below which 95% of all observed queue lengths fall.

The results of the analysis are presented in **Table 2** through to **Table 13** appended in in **Appendix B** of this report and discussed in the following paragraphs.

Alfred Road/Rochdale Road/Myera Street

This intersection currently operates at about 63% and 57% capacity during the AM and PM peaks and with an overall intersection LoS B during the critical AM and PM weekday peak periods. The longest queues are reported (also observed) on the western approach (about 90m) during the AM peak hour and on the eastern approach (about 50m) during the PM peak hour (refer **Table 2** and **Table 3** for more details).

The addition of the childcare centre-generated traffic (both 30/70 and 70/30 scenarios) will result in no change in overall intersection LoS which remains at LoS B. As expected, the intersection degree of saturation (capacity) has increased marginally to 68%/58% (30/70 scenario) and 66%/57% (70/30 scenario) for the AM and PM peaks, respectively. It should be noted that the intersection queues on Alfred Road west approach in the post-development scenario combine queues from the Alfred Road/Rochdale Road/Myera Street intersection and the new Alfred Road crossover as this crossover is proposed between the Butler Road and Rochdale Road/Myera Street intersections. Refer **Table 4** through to **Table 7** for more details.

Accordingly, it is concluded that the proposed centre will not have a material impact on the operation of the adjacent Alfred Road/Rochdale Road/Myera Street intersection during the critical weekday peak hours.

Alfred Road/Butler Avenue intersection

This intersection currently operates at about 51% and 39% capacity and LoS A/C² and B/C on the critical Butler Avenue approach during the AM and PM peaks, respectively, with minimal queues, which matches several site observations undertaken by Transcore (refer **Table 8** and **Table 9** for more details).

The addition of the childcare centre-generated traffic (both 30/70 and 70/30 scenarios) has resulted in change in LoS on Butler Avenue approach to B/D for the AM and no change in the PM peak with associated increase in delays of up to 5sec (AM peak) and 2sec (PM peak). Accordingly, it can be concluded that both 30/70 and 70/30 scenarios would have a similar impact on the operation of this intersection which remains satisfactory with moderate increases in delays. Refer **Table 10** through to **Table 13** for more details.

² LoS A/C indicates the left turn out is at Los A and the right turn out is at LoS C

Alfred Road crossover:

The results of the SIDRA assessment suggest that this left-in only crossover would operate satisfactorily, with an overall LoS A and no delays/queues. Refer **Table 14** to **Table 17** for more details.

7.0 Traffic Management on the Frontage Streets

Butler Avenue is an 8.5m wide single undivided carriageway (one lane in each direction) with a 1.5m wide pedestrian path along eastern side of the road in the immediate vicinity of subject site. On-street parking is presently permitted on both sides of Butler Avenue along its entire length. Butler Avenue is a no through road at the south end. Refer **Figure 4** and **Figure 5** for more details.

Butler Avenue operates under a default built-up area speed limit of 50km/h. Butler Avenue is classified as *Access Road* in the *Main Roads WA Metropolitan Functional Road Hierarchy* document.



Figure 4. Northbound view along Butler Avenue towards Alfred Road



Figure 5. Southbound view along Butler Avenue

Alfred Road at this location is constructed to a single divided carriageway with one lane in each direction. Pedestrian footpath is in place along the both sides of the road.

Alfred Road in the immediate vicinity of the subject site operates under a speed limit regime of 60km/h. Refer **Figure 6** and **Figure 7** for more details.



Figure 6. Eastbound view along Alfred Road in the vicinity of the site



Figure 7. Westbound view along Alfred Road from Butler Avenue intersection

Alfred Road is classified as *Distributor A Road* in the Main Roads WA *Metropolitan Functional Road Hierarchy* document.

Based on the latest available traffic data for this road sourced from Main Roads WA, Alfred Road (east of West Coast Hwy) carried approximately 11,647vpd in 2017/2018.

Butler Avenue forms a priority-controlled T-intersection at the northern end with Alfred Road immediately adjacent to the subject site.

Main Roads WA Intersection *Crash Ranking Report* provides detailed crash data for the Alfred Road/Butler Avenue intersection over the 5-year period ending 31 December 2017. Crash report information for this intersection is presented in **Table 1**.

Table 1. Crash history for the Alfred Road/Butler Avenue intersection

Intersection				Total Crashes	Casualty
Alfred Road/Butler Avenue				6	1
Right Angle	Rear End	Pedestrian	Cycle	Wet	Night
1	0	0	0	0	0

A crash reported is of right-angle type. Importantly, no crashes involved pedestrians or cyclists. None of the crash factors are denoted as “higher than expected” in *Intersection Crash Ranking* report.

8.0 Public Transport Access

The subject site is served by bus route number 27, operating along Alfred Road as shown in **Figure 8**. This bus service provides connectivity to Claremont railway station and Shenton Park railway station securing access to Freemantle railway line. Two closest bus stops are located on Alfred Road, which are approximately 14m north and approximately 90m west of the subject. Both bus stops are accessible via existing path network.

As such it is concluded that the subject site has a good public transport coverage.

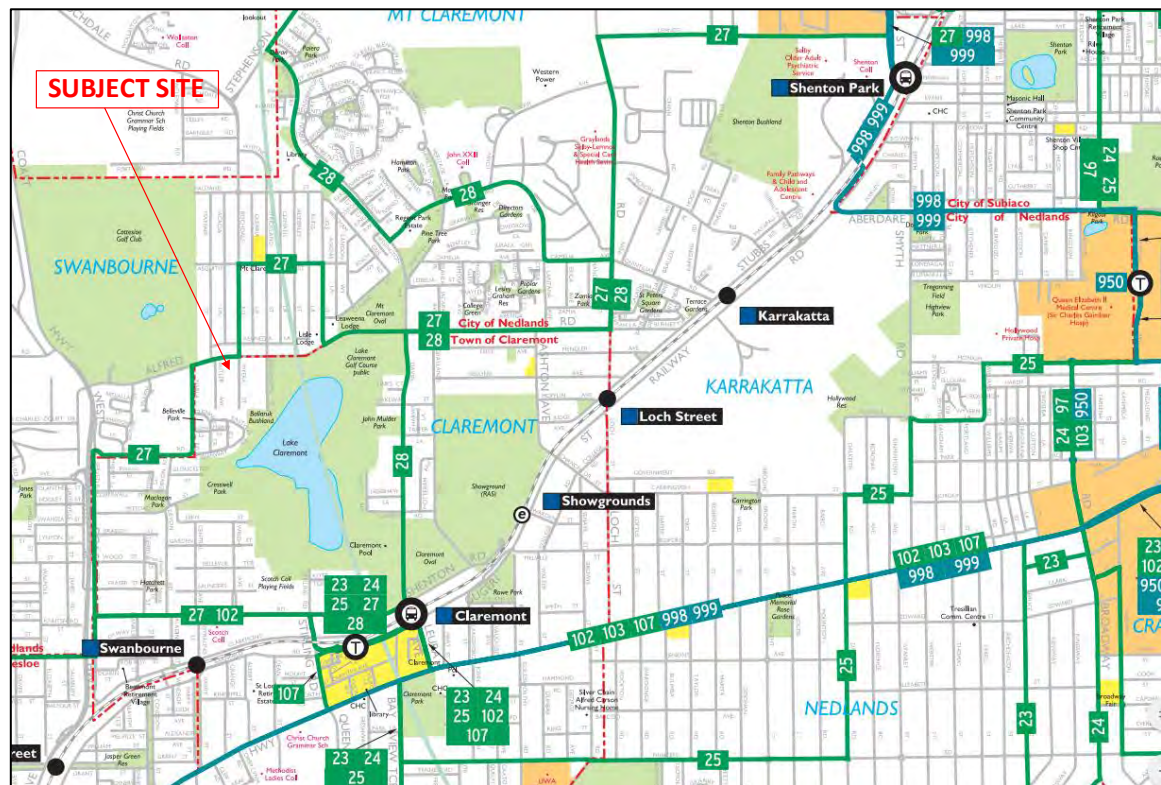


Figure 8: Existing bus services (source: TransPerth)

9.0 Pedestrian Access

Pedestrian access to the subject site is available directly from Butler Avenue and Alfred Road via the existing footpaths on surrounding roads.

Pedestrian crossing opportunities on Alfred Road are in place at the signalised Alfred Road/Rochdale Road/Myera Street intersection, which is located approximately 65m east of the subject site.

As requested by Town of Claremont, Transcore investigated installation of a splitter island with pedestrian refuge on Butler Avenue at the Alfred Road intersection to improve the safety of pedestrians crossing at this location. A concept plan for this splitter island was prepared and tested for a 10.5m rigid waste collection truck template to confirm the suitability of the design.

Accordingly, swept path assessment plans for the Alfred Road/Butler Avenue splitter island design are attached in **Appendix C**.



11.0 Site Specific Issues

No particular site-specific issues have been identified for this proposed childcare centre.

12.0 Safety Issues

A sightline investigation of Alfred Road/Butler Avenue intersection with respect to traffic approaching from the east via Alfred Road/Rochdale Road/Myera Street intersection has been undertaken to confirm the suitability of the currently available sightlines.

The relevant sight distance factor in this case is the safe intersection sight distance (SISD). The SISD is defined as “minimum sight distance which should be provided on major road at any intersection”. The *Austroads Guide to Road Design Part 3* and *Part 4A* publications provide guidance as to how to establish the minimum SISD requirements for a particular intersection. These sightlines are measured 3m back from the hold line, between the eye level of a driver (1.1m) and the top of target car (1.25m) and vice versa.

As the subject intersection is an existing one the appropriate Extended Design Domain (EDD) values of SISD should be regarded in this case. The EDD are values outside of the Normal Design Domain (NDD) that through research and/or operating experience, particular road agencies have found to provide a suitable solution in constrained situations (typically at brownfield sites). The EDD typically includes reviewing geometry of existing roads and intersections.

Accordingly, using the appropriate formula and site-specific factors (some of which are conservative for robustness) such as: 85th percentile traffic speed (source: Main Roads WA), observation and reaction time (higher speed urban roads), deceleration coefficient (norm-day and norm-night sealed roads) and longitudinal road grade the required SISD has been calculated to be 95m. This would equate to a vehicle driver travelling in the westbound direction along Alfred Road and just passing the Alfred Road/Rochdale Road/Myera Street traffic signals being able to observe the top of a stationary vehicle at Butler Road intersection (and vice versa). The site observation suggests that this is the case. Sightlines along Alfred Road to the west of Butler Avenue are unrestricted (refer SISD assessment plan attached **Appendix D** in for more details.)

Furthermore, Western Power recently undertook power undergrounding works which resulted in the removal of powerline poles along the southern side of Alfred Road including a pole which was previously located at the southeast corner of the Alfred Road/Butler Avenue intersection. This pole may have previously impacted on the sightlines for traffic approaching the Butler Avenue intersection from the east no longer poses an issue.

Similarly, any existing substantial/overgrown vegetation within the road verge that may affect the intersection sightlines should be regularly maintained and pruned.

No other potential safety concerns have been identified for this development.

13.0 Conclusions

This revised Transport Impact Statement provides information on the revised proposal for a childcare centre development to be located at Lots 18 (164) & 19 (162) Alfred Road, Swanbourne, Town of Claremont.

The site features good connectivity via the existing road network and has convenient and easy access to public transport services. The site is well served by the existing pedestrian facilities and cyclist facilities which are presently in place along Alfred Road.

The Centre is proposed to cater for 65 children and 12 staff.

Vehicle access to and from the site will be via a full-movement crossover on Butler Avenue and a left-turn in only crossover on Alfred Road which lead to a 19-bay on-site car park inclusive of one ACROD bay.

Based on the assessment undertaken in this report, the proposed total on-site parking supply of 19 bays is considered to be sufficient to cater for the needs of the proposed childcare centre.

The traffic generation, distribution and capacity analysis documented in Section 6.0 of this report demonstrates that the traffic operations of the road network in the vicinity of the proposed childcare centre would not be adversely impacted by the additional development traffic.

Accordingly, it is concluded the traffic related issues should not form an impediment to the approval of this childcare centre.

Appendix A

PROPOSED REVISED DEVELOPMENT PLAN

Appendix B

SIDRA OUTPUTS

Table 2. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday AM peak period (Existing situation)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed	
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles	Distance			km/h	
South: Myera St (S)														
10	L2	3	0.0	3	0.0	0.040	21.6	LOS C	0.3	2.4	0.78	0.63	0.78	32.4
11	T1	5	0.0	5	0.0	0.040	17.0	LOS B	0.3	2.4	0.78	0.63	0.78	39.2
12	R2	8	0.0	8	0.0	0.040	21.6	LOS C	0.3	2.4	0.78	0.63	0.78	41.0
Approach		16	0.0	16	0.0	0.040	20.2	LOS C	0.3	2.4	0.78	0.63	0.78	39.3
East: Alfred Road (E)														
1	L2	3	0.0	3	0.0	0.075	12.4	LOS B	1.0	7.5	0.52	0.42	0.52	48.9
2	T1	263	5.2	263	5.2	0.274	8.9	LOS A	3.5	26.8	0.61	0.52	0.61	46.1
3	R2	20	5.2	20	5.2	0.274	15.2	LOS B	3.5	26.8	0.64	0.56	0.64	46.9
Approach		286	5.1	286	5.1	0.274	9.4	LOS A	3.5	26.8	0.61	0.52	0.61	46.2
North: Rochdale Rd (N)														
4	L2	82	5.2	82	5.2	0.181	22.4	LOS C	1.8	13.6	0.82	0.73	0.82	40.0
5	T1	17	0.0	17	0.0	0.616	20.8	LOS C	6.3	47.8	0.93	0.83	0.97	37.2
6	R2	231	5.2	231	5.2	0.616	25.4	LOS C	6.3	47.8	0.93	0.83	0.97	29.8
Approach		330	4.9	330	4.9	0.616	24.5	LOS C	6.3	47.8	0.91	0.80	0.93	33.6
West: Alfred Road (W)														
7	L2	286	5.2	286	5.2	0.308	13.3	LOS B	4.4	33.5	0.60	0.74	0.60	38.5
8	T1	604	5.2	604	5.2	0.629	10.0	LOS B	11.7	89.6	0.76	0.68	0.76	46.8
9	R2	5	0.0	5	0.0	0.629	15.4	LOS B	11.7	89.6	0.76	0.68	0.76	40.6
Approach		895	5.2	895	5.2	0.629	11.1	LOS B	11.7	89.6	0.71	0.70	0.71	43.8
All Vehicles		1527	5.1	1527	5.1	0.629	13.8	LOS B	11.7	89.6	0.73	0.69	0.74	41.1

Table 3. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday PM peak period (Existing situation)

Movement Performance - Vehicles														
Mov ID	Turn	Demand Flows		Arrival Flows		Deg. Satn	Average Delay	Level of Service	95% Back of Queue		Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m				km/h
South: Myera St (S)														
10	L2	2	0.0	2	0.0	0.014	17.4	LOS B	0.1	1.0	0.68	0.59	0.68	34.8
11	T1	2	0.0	2	0.0	0.014	12.8	LOS B	0.1	1.0	0.68	0.59	0.68	40.9
12	R2	4	0.0	4	0.0	0.014	17.4	LOS B	0.1	1.0	0.68	0.59	0.68	42.9
Approach		8	0.0	8	0.0	0.014	16.2	LOS B	0.1	1.0	0.68	0.59	0.68	40.9
East: Alfred Road (E)														
1	L2	8	0.0	8	0.0	0.157	15.7	LOS B	2.1	15.9	0.64	0.53	0.64	46.7
2	T1	477	5.2	477	5.2	0.571	12.7	LOS B	8.6	65.4	0.77	0.67	0.77	41.9
3	R2	49	5.2	49	5.2	0.571	19.1	LOS B	8.6	65.4	0.82	0.72	0.82	44.5
Approach		534	5.1	534	5.1	0.571	13.3	LOS B	8.6	65.4	0.77	0.67	0.77	42.5
North: Rochdale Rd (N)														
4	L2	35	5.2	35	5.2	0.057	17.7	LOS B	0.6	4.8	0.69	0.68	0.69	42.1
5	T1	14	0.0	14	0.0	0.547	16.2	LOS B	6.5	49.5	0.86	0.80	0.86	39.0
6	R2	275	5.2	275	5.2	0.547	20.8	LOS C	6.5	49.5	0.86	0.80	0.86	32.1
Approach		324	5.0	324	5.0	0.547	20.3	LOS C	6.5	49.5	0.84	0.79	0.84	34.1
West: Alfred Road (W)														
7	L2	187	5.2	187	5.2	0.243	16.0	LOS B	3.2	24.6	0.67	0.74	0.67	36.7
8	T1	261	5.2	261	5.2	0.325	11.1	LOS B	4.7	35.9	0.70	0.59	0.70	45.8
9	R2	1	0.0	1	0.0	0.325	16.5	LOS B	4.7	35.9	0.70	0.59	0.70	39.8
Approach		449	5.2	449	5.2	0.325	13.2	LOS B	4.7	35.9	0.68	0.65	0.68	41.5
All Vehicles		1315	5.1	1315	5.1	0.571	15.0	LOS B	8.6	65.4	0.76	0.69	0.76	39.7

Table 4. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday AM peak period (Post development 30/70 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue Vehicles	Back of Queue Distance	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		veh	m				km/h
South: Myera St (S)														
10	L2	3	0.0	3	0.0	0.043	23.3	LOS C	0.3	2.6	0.82	0.64	0.82	31.4
11	T1	5	0.0	5	0.0	0.043	18.8	LOS B	0.3	2.6	0.82	0.64	0.82	38.5
12	R2	8	0.0	8	0.0	0.043	23.3	LOS C	0.3	2.6	0.82	0.64	0.82	40.2
Approach		16	0.0	16	0.0	0.043	21.9	LOS C	0.3	2.6	0.82	0.64	0.82	38.5
East: Alfred Road (E)														
1	L2	3	0.0	3	0.0	0.075	11.9	LOS B	1.0	7.4	0.50	0.40	0.50	49.2
2	T1	272	5.2	272	5.2	0.272	8.3	LOS A	3.5	26.8	0.59	0.51	0.59	46.8
3	R2	20	5.2	20	5.2	0.272	14.6	LOS B	3.5	26.8	0.62	0.54	0.62	47.2
Approach		295	5.1	295	5.1	0.272	8.8	LOS A	3.5	26.8	0.59	0.51	0.59	46.9
North: Rochdale Rd (N)														
4	L2	82	5.2	82	5.2	0.195	23.4	LOS C	1.8	14.0	0.84	0.74	0.84	39.6
5	T1	17	0.0	17	0.0	0.681	22.7	LOS C	6.8	52.2	0.96	0.87	1.06	36.5
6	R2	240	5.2	240	5.2	0.681	27.4	LOS C	6.8	52.2	0.96	0.87	1.06	28.9
Approach		339	4.9	339	4.9	0.681	26.2	LOS C	6.8	52.2	0.93	0.84	1.01	32.7
West: Alfred Road (W)														
7	L2	291	5.2	291	5.2	0.303	11.1	LOS B	4.3	32.8	0.58	0.72	0.58	39.1
8	T1	615	5.2	615	5.2	0.668	9.3	LOS A	9.6	73.4	0.74	0.66	0.74	46.9
9	R2	5	0.0	5	0.0	0.668	13.0	LOS B	9.6	73.4	0.74	0.66	0.74	40.3
Approach		911	5.2	911	5.2	0.668	9.9	LOS A	9.6	73.4	0.69	0.68	0.69	44.0
All Vehicles		1561	5.1	1561	5.1	0.681	13.4	LOS B	9.6	73.4	0.72	0.68	0.74	40.9

Table 5. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday PM peak period (Post development 30/70 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue Vehicles	Back of Queue Distance	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		veh	m				km/h
South: Myera St (S)														
10	L2	2	0.0	2	0.0	0.014	17.4	LOS B	0.1	1.0	0.68	0.59	0.68	34.8
11	T1	2	0.0	2	0.0	0.014	12.8	LOS B	0.1	1.0	0.68	0.59	0.68	40.9
12	R2	4	0.0	4	0.0	0.014	17.4	LOS B	0.1	1.0	0.68	0.59	0.68	42.9
Approach		8	0.0	8	0.0	0.014	16.2	LOS B	0.1	1.0	0.68	0.59	0.68	40.9
East: Alfred Road (E)														
1	L2	8	0.0	8	0.0	0.159	15.7	LOS B	2.1	16.2	0.64	0.53	0.64	46.7
2	T1	483	5.2	483	5.2	0.578	12.7	LOS B	8.7	66.4	0.77	0.67	0.77	41.9
3	R2	49	5.2	49	5.2	0.578	19.2	LOS B	8.7	66.4	0.82	0.72	0.82	44.5
Approach		540	5.1	540	5.1	0.578	13.4	LOS B	8.7	66.4	0.78	0.68	0.78	42.4
North: Rochdale Rd (N)														
4	L2	35	5.2	35	5.2	0.057	17.7	LOS B	0.6	4.8	0.69	0.68	0.69	42.1
5	T1	14	0.0	14	0.0	0.556	16.3	LOS B	6.6	50.4	0.86	0.80	0.86	39.0
6	R2	279	5.2	279	5.2	0.556	20.9	LOS C	6.6	50.4	0.86	0.80	0.86	32.1
Approach		328	5.0	328	5.0	0.556	20.4	LOS C	6.6	50.4	0.84	0.79	0.84	34.0
West: Alfred Road (W)														
7	L2	192	5.2	192	5.2	0.250	14.4	LOS B	3.3	25.3	0.67	0.73	0.67	36.8
8	T1	269	5.2	269	5.2	0.335	11.2	LOS B	4.9	37.2	0.70	0.59	0.70	45.0
9	R2	1	0.0	1	0.0	0.335	14.8	LOS B	4.9	37.2	0.70	0.59	0.70	38.9
Approach		462	5.2	462	5.2	0.335	12.5	LOS B	4.9	37.2	0.69	0.65	0.69	41.1
All Vehicles		1338	5.1	1338	5.1	0.578	14.8	LOS B	8.7	66.4	0.76	0.69	0.76	39.5

Table 6. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday AM peak period (Post development 70/30 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver No. Cycles	Average Speed	
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles	Distance				
South: Myera St (S)														
10	L2	3	0.0	3	0.0	0.043	23.3	LOS C	0.3	2.6	0.82	0.64	0.82	31.4
11	T1	5	0.0	5	0.0	0.043	18.8	LOS B	0.3	2.6	0.82	0.64	0.82	38.5
12	R2	8	0.0	8	0.0	0.043	23.3	LOS C	0.3	2.6	0.82	0.64	0.82	40.2
Approach		16	0.0	16	0.0	0.043	21.9	LOS C	0.3	2.6	0.82	0.64	0.82	38.5
East: Alfred Road (E)														
1	L2	3	0.0	3	0.0	0.074	11.9	LOS B	0.9	7.2	0.50	0.40	0.50	49.2
2	T1	267	5.2	267	5.2	0.268	8.3	LOS A	3.4	26.3	0.59	0.50	0.59	46.8
3	R2	20	5.2	20	5.2	0.268	14.6	LOS B	3.4	26.3	0.62	0.54	0.62	47.2
Approach		290	5.1	290	5.1	0.268	8.7	LOS A	3.4	26.3	0.59	0.51	0.59	46.9
North: Rochdale Rd (N)														
4	L2	82	5.2	82	5.2	0.195	23.4	LOS C	1.8	14.0	0.84	0.74	0.84	39.6
5	T1	17	0.0	17	0.0	0.664	22.4	LOS C	6.6	50.6	0.95	0.86	1.04	36.6
6	R2	235	5.2	235	5.2	0.664	27.0	LOS C	6.6	50.6	0.95	0.86	1.04	29.0
Approach		334	4.9	334	4.9	0.664	25.9	LOS C	6.6	50.6	0.93	0.83	0.99	32.9
West: Alfred Road (W)														
7	L2	288	5.2	288	5.2	0.300	11.1	LOS B	4.2	32.4	0.58	0.72	0.58	39.1
8	T1	609	5.2	609	5.2	0.657	9.3	LOS A	9.6	73.4	0.73	0.65	0.73	46.9
9	R2	5	0.0	5	0.0	0.657	12.9	LOS B	9.6	73.4	0.73	0.65	0.73	40.3
Approach		902	5.2	902	5.2	0.657	9.9	LOS A	9.6	73.4	0.68	0.67	0.68	44.1
All Vehicles		1542	5.1	1542	5.1	0.664	13.3	LOS B	9.6	73.4	0.72	0.68	0.73	41.0

Table 7. SIDRA results for the Alfred Road/Rochdale Road/Myera Street intersection – weekday PM peak period (Post development 70/30 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg Satn	Average Delay	Level of Service	95% Back of Queue	Distance	Prop. Queued	Effective Stop Rate	Aver No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	m				km/h
South: Myera St (S)														
10	L2	2	0.0	2	0.0	0.014	17.4	LOS B	0.1	1.0	0.68	0.59	0.68	34.8
11	T1	2	0.0	2	0.0	0.014	12.8	LOS B	0.1	1.0	0.68	0.59	0.68	40.9
12	R2	4	0.0	4	0.0	0.014	17.4	LOS B	0.1	1.0	0.68	0.59	0.68	42.9
Approach		8	0.0	8	0.0	0.014	16.2	LOS B	0.1	1.0	0.68	0.59	0.68	40.9
East: Alfred Road (E)														
1	L2	8	0.0	8	0.0	0.158	15.7	LOS B	2.1	16.0	0.64	0.53	0.64	46.7
2	T1	480	5.2	480	5.2	0.574	12.7	LOS B	8.6	65.9	0.77	0.67	0.77	41.9
3	R2	49	5.2	49	5.2	0.574	19.1	LOS B	8.6	65.9	0.82	0.72	0.82	44.5
Approach		537	5.1	537	5.1	0.574	13.3	LOS B	8.6	65.9	0.77	0.67	0.77	42.4
North: Rochdale Rd (N)														
4	L2	35	5.2	35	5.2	0.057	17.7	LOS B	0.6	4.8	0.69	0.68	0.69	42.1
5	T1	14	0.0	14	0.0	0.549	16.2	LOS B	6.5	49.8	0.86	0.80	0.86	39.0
6	R2	276	5.2	276	5.2	0.549	20.8	LOS C	6.5	49.8	0.86	0.80	0.86	32.1
Approach		325	5.0	325	5.0	0.549	20.3	LOS C	6.5	49.8	0.84	0.79	0.84	34.1
West: Alfred Road (W)														
7	L2	189	5.2	189	5.2	0.246	14.4	LOS B	3.3	24.9	0.67	0.73	0.67	36.8
8	T1	264	5.2	264	5.2	0.329	11.2	LOS B	4.8	36.4	0.70	0.59	0.70	45.0
9	R2	1	0.0	1	0.0	0.329	14.8	LOS B	4.8	36.4	0.70	0.59	0.70	38.9
Approach		454	5.2	454	5.2	0.329	12.5	LOS B	4.8	36.4	0.69	0.65	0.69	41.1
All Vehicles		1324	5.1	1324	5.1	0.574	14.8	LOS B	8.6	65.9	0.76	0.69	0.76	39.6

Table 8. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday AM peak period (Existing situation)

Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
South: Butler Avenue (S)													
1	L2	4	0.0	4	0.0	0.051	9.8	LOS A	0.1	1.0	0.73	0.73	39.4
3	R2	8	0.0	8	0.0	0.051	24.6	LOS C	0.1	1.0	0.73	0.73	22.9
Approach		12	0.0	12	0.0	0.051	19.6	LOS C	0.1	1.0	0.73	0.73	31.0
East: Alfred Road (E)													
4	L2	4	0.0	4	0.0	0.254	5.4	LOS A	0.0	0.0	0.00	0.00	54.6
5	T1	493	5.2	493	5.2	0.254	0.0	LOS A	0.0	0.0	0.00	0.00	59.9
Approach		497	5.2	497	5.2	0.254	0.0	NA	0.0	0.0	0.00	0.00	59.8
West: Alfred Road (W)													
11	T1	887	5.2	887	5.2	0.505	0.0	LOS A	0.1	0.6	0.01	0.01	59.9
12	R2	3	0.0	3	0.0	0.505	9.3	LOS A	0.1	0.6	0.01	0.01	55.3
Approach		890	5.2	890	5.2	0.505	0.1	NA	0.1	0.6	0.01	0.01	59.8
All Vehicles		1399	5.1	1399	5.1	0.505	0.2	NA	0.1	1.0	0.01	0.01	59.5

Table 9. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday PM peak period (Existing situation)

Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
South: Butler Avenue (S)													
1	L2	6	0.0	6	0.0	0.020	11.9	LOS B	0.1	0.5	0.64	0.64	43.1
3	R2	3	0.0	3	0.0	0.020	17.8	LOS C	0.1	0.5	0.64	0.64	27.6
Approach		9	0.0	9	0.0	0.020	13.9	LOS B	0.1	0.5	0.64	0.64	40.1
East: Alfred Road (E)													
4	L2	6	0.0	6	0.0	0.386	5.4	LOS A	0.0	0.0	0.00	0.00	54.6
5	T1	748	5.2	748	5.2	0.386	0.0	LOS A	0.0	0.0	0.00	0.00	59.8
Approach		754	5.2	754	5.2	0.386	0.1	NA	0.0	0.0	0.00	0.00	59.8
West: Alfred Road (W)													
11	T1	446	5.2	446	5.2	0.231	0.1	LOS A	0.0	0.3	0.01	0.01	59.8
12	R2	2	0.0	2	0.0	0.231	10.5	LOS B	0.0	0.3	0.01	0.01	55.3
Approach		448	5.2	448	5.2	0.231	0.1	NA	0.0	0.3	0.01	0.01	59.8
All Vehicles		1211	5.1	1211	5.1	0.386	0.2	NA	0.1	0.5	0.01	0.01	59.6

Table 10. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday AM peak period (Post development 30/70 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue		Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m				km/h
South: Butler Avenue (S)														
1	L2	12	0.0	12	0.0	0.175	10.2	LOS B	0.5	3.7	0.79	0.96	0.80	37.4
3	R2	25	0.0	25	0.0	0.175	29.2	LOS D	0.5	3.7	0.79	0.96	0.80	20.7
Approach		37	0.0	37	0.0	0.175	23.3	LOS C	0.5	3.7	0.79	0.96	0.80	28.4
East: Alfred Road (E)														
4	L2	4	0.0	4	0.0	0.268	3.5	LOS A	0.0	0.0	0.00	0.00	0.00	53.8
5	T1	519	5.2	519	5.2	0.268	0.0	LOS A	0.0	0.0	0.00	0.00	0.00	59.9
Approach		523	5.2	523	5.2	0.268	0.0	NA	0.0	0.0	0.00	0.00	0.00	59.9
West: Alfred Road (W)														
11	T1	934	5.2	934	5.2	0.488	0.1	LOS A	0.3	2.3	0.03	0.01	0.04	59.5
12	R2	12	0.0	12	0.0	0.488	9.9	LOS A	0.3	2.3	0.03	0.01	0.04	55.1
Approach		945	5.1	945	5.1	0.488	0.2	NA	0.3	2.3	0.03	0.01	0.04	59.4
All Vehicles		1505	5.0	1505	5.0	0.488	0.7	NA	0.5	3.7	0.04	0.03	0.04	58.5

Table 11. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday PM peak period (Post development 30/70 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed	
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m				
South: Butler Avenue (S)														
1	L2	12	0.0	12	0.0	0.086	12.6	LOS B	0.3	2.0	0.73	0.98	0.73	41.1
3	R2	17	0.0	17	0.0	0.086	19.9	LOS C	0.3	2.0	0.73	0.98	0.73	24.9
Approach		28	0.0	28	0.0	0.086	16.9	LOS C	0.3	2.0	0.73	0.98	0.73	34.3
East: Alfred Road (E)														
4	L2	6	0.0	6	0.0	0.406	3.5	LOS A	0.0	0.0	0.00	0.00	0.00	53.8
5	T1	787	5.2	787	5.2	0.406	0.0	LOS A	0.0	0.0	0.00	0.00	0.00	59.8
Approach		794	5.2	794	5.2	0.406	0.0	NA	0.0	0.0	0.00	0.00	0.00	59.8
West: Alfred Road (W)														
11	T1	469	5.2	469	5.2	0.248	0.2	LOS A	0.1	1.0	0.03	0.01	0.03	59.4
12	R2	6	0.0	6	0.0	0.248	11.1	LOS B	0.1	1.0	0.03	0.01	0.03	55.0
Approach		476	5.1	476	5.1	0.248	0.3	NA	0.1	1.0	0.03	0.01	0.03	59.3
All Vehicles		1298	5.0	1298	5.0	0.406	0.5	NA	0.3	2.0	0.03	0.03	0.03	58.9

Table 12. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday AM peak period (Post development 70/30 option)

Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
South: Butler Avenue (S)													
1	L2	21	0.0	21	0.0	0.128	10.1	LOS B	0.4	2.8	0.69	0.93	40.1
3	R2	16	0.0	16	0.0	0.128	29.7	LOS D	0.4	2.8	0.69	0.93	23.7
Approach		37	0.0	37	0.0	0.128	18.5	LOS C	0.4	2.8	0.69	0.93	35.6
East: Alfred Road (E)													
4	L2	4	0.0	4	0.0	0.268	3.5	LOS A	0.0	0.0	0.00	0.00	53.8
5	T1	519	5.2	519	5.2	0.268	0.0	LOS A	0.0	0.0	0.00	0.00	59.9
Approach		523	5.2	523	5.2	0.268	0.0	NA	0.0	0.0	0.00	0.00	59.9
West: Alfred Road (W)													
11	T1	934	5.2	934	5.2	0.498	0.2	LOS A	0.6	4.4	0.05	0.01	59.1
12	R2	22	0.0	22	0.0	0.498	10.0	LOS A	0.6	4.4	0.05	0.01	54.8
Approach		956	5.1	956	5.1	0.498	0.5	NA	0.6	4.4	0.05	0.01	58.9
All Vehicles		1516	5.0	1516	5.0	0.498	0.8	NA	0.6	4.4	0.05	0.03	58.4

Table 13. SIDRA results for the Alfred Road/Butler Avenue intersection – weekday PM peak period (Post development 70/30 option)

Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
South: Butler Avenue (S)													
1	L2	20	0.0	20	0.0	0.067	12.6	LOS B	0.2	1.7	0.68	0.96	42.5
3	R2	8	0.0	8	0.0	0.067	20.0	LOS C	0.2	1.7	0.68	0.96	26.8
Approach		28	0.0	28	0.0	0.067	14.8	LOS B	0.2	1.7	0.68	0.96	39.9
East: Alfred Road (E)													
4	L2	6	0.0	6	0.0	0.406	3.5	LOS A	0.0	0.0	0.00	0.00	53.8
5	T1	787	5.2	787	5.2	0.406	0.0	LOS A	0.0	0.0	0.00	0.00	59.8
Approach		794	5.2	794	5.2	0.406	0.0	NA	0.0	0.0	0.00	0.00	59.8
West: Alfred Road (W)													
11	T1	469	5.2	469	5.2	0.256	0.4	LOS A	0.3	2.0	0.06	0.02	58.8
12	R2	13	0.0	13	0.0	0.256	11.2	LOS B	0.3	2.0	0.06	0.02	54.6
Approach		482	5.1	482	5.1	0.256	0.6	NA	0.3	2.0	0.06	0.02	58.6
All Vehicles		1304	5.0	1304	5.0	0.406	0.6	NA	0.3	2.0	0.04	0.03	58.7

**Table 14. SIDRA results for the Alfred Road Crossover – weekday AM peak period
(Post development 30/70 option)**

Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
East: Alfred Road (E)													
4	L2	19	0.0	19	0.0	0.275	3.7	LOS A	0.0	0.0	0.00	0.00	47.3
5	T1	519	5.2	519	5.2	0.275	0.0	LOS A	0.0	0.0	0.00	0.00	57.6
Approach		538	5.0	538	5.0	0.275	0.1	NA	0.0	0.0	0.00	0.00	57.0
West: Alfred Road (W)													
11	T1	942	5.2	942	5.2	0.482	0.0	LOS A	2.0	14.3	0.00	0.00	59.9
Approach		942	5.2	942	5.2	0.482	0.0	NA	2.0	14.3	0.00	0.00	59.9
All Vehicles		1480	5.1	1480	5.1	0.482	0.1	NA	2.0	14.3	0.00	0.01	58.7

**Table 15. SIDRA results for the Alfred Road Crossover – weekday PM peak period
(Post development 30/70 option)**

Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
East: Alfred Road (E)													
4	L2	11	0.0	11	0.0	0.408	3.7	LOS A	0.0	0.0	0.00	0.00	48.1
5	T1	787	5.2	787	5.2	0.408	0.0	LOS A	0.0	0.0	0.00	0.00	59.0
Approach		798	5.1	798	5.1	0.408	0.1	NA	0.0	0.0	0.00	0.00	58.8
West: Alfred Road (W)													
11	T1	473	5.2	473	5.2	0.242	0.0	LOS A	0.0	0.0	0.00	0.00	59.9
Approach		473	5.2	473	5.2	0.242	0.0	NA	0.0	0.0	0.00	0.00	59.9
All Vehicles		1271	5.2	1271	5.2	0.408	0.0	NA	0.0	0.0	0.00	0.00	59.2

**Table 16. SIDRA results for the Alfred Road Crossover – weekday AM peak period
(Post development 70/30 option)**

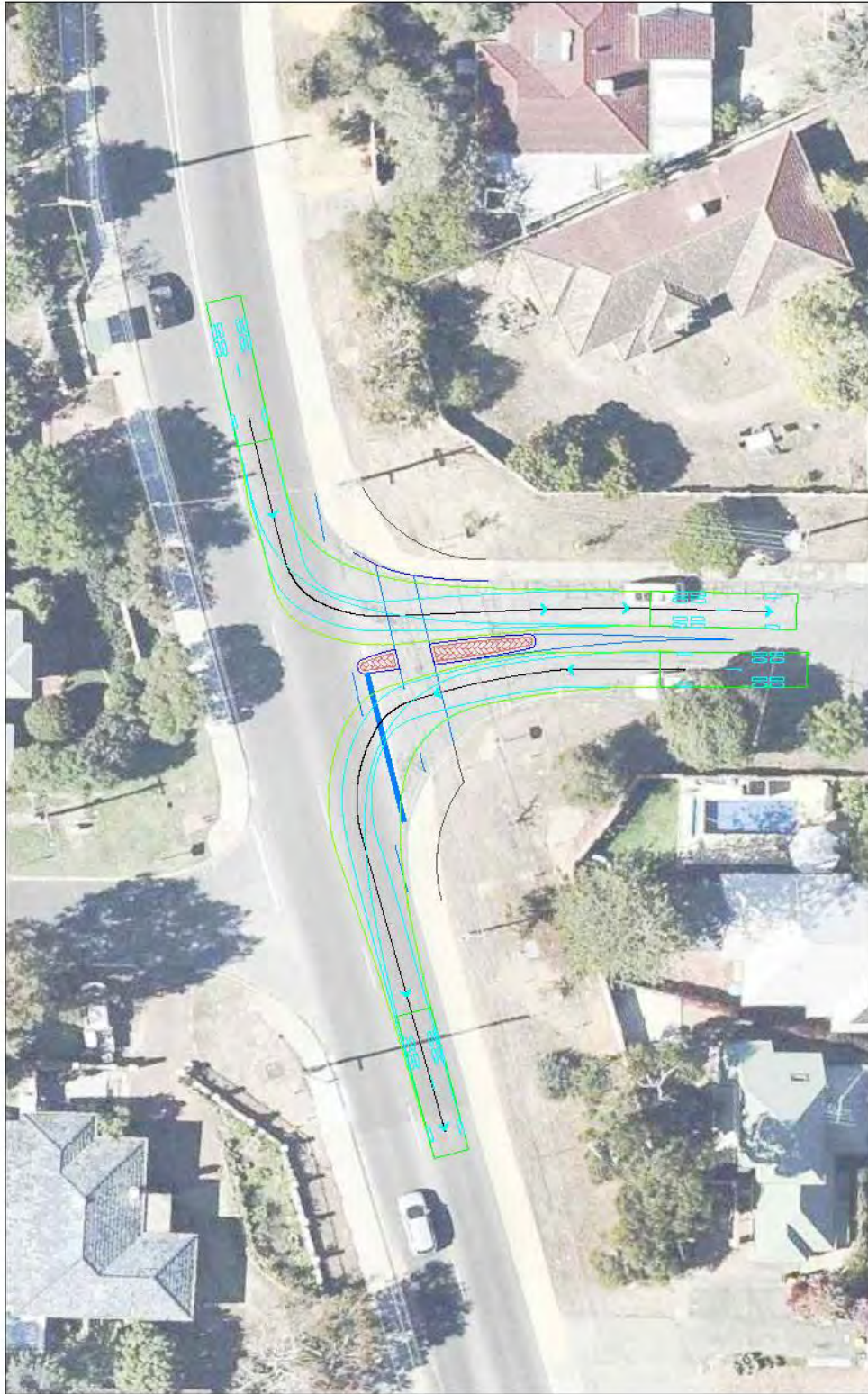
Movement Performance - Vehicles													
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h
East: Alfred Road (E)													
4	L2	8	0.0	8	0.0	0.270	3.7	LOS A	0.0	0.0	0.00	0.00	48.1
5	T1	519	5.2	519	5.2	0.270	0.0	LOS A	0.0	0.0	0.00	0.00	58.8
Approach		527	5.1	527	5.1	0.270	0.1	NA	0.0	0.0	0.00	0.00	58.6
West: Alfred Road (W)													
11	T1	942	5.2	942	5.2	0.482	0.0	LOS A	1.8	13.0	0.00	0.00	59.9
Approach		942	5.2	942	5.2	0.482	0.0	NA	1.8	13.0	0.00	0.00	59.9
All Vehicles		1469	5.2	1469	5.2	0.482	0.0	NA	1.8	13.0	0.00	0.00	59.4

Table 17. SIDRA results for the Alfred Road Crossover – weekday PM peak period (Post development 70/30 option)

Movement Performance - Vehicles														
Mov ID	Turn	Demand	Flows	Arrival	Flows	Deg. Satn	Average Delay	Level of Service	95% Back of Queue	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed	
		Total veh/h	HV %	Total veh/h	HV %	v/c	sec		Vehicles veh	Distance m			km/h	
East: Alfred Road (E)														
4	L2	4	0.0	4	0.0	0.405	3.7	LOS A	0.0	0.0	0.00	0.00	48.4	
5	T1	787	5.2	787	5.2	0.405	0.0	LOS A	0.0	0.0	0.00	0.00	59.5	
Approach		792	5.2	792	5.2	0.405	0.0	NA	0.0	0.0	0.00	0.00	59.4	
West: Alfred Road (W)														
11	T1	469	5.2	469	5.2	0.240	0.0	LOS A	0.0	0.0	0.00	0.00	59.9	
Approach		469	5.2	469	5.2	0.240	0.0	NA	0.0	0.0	0.00	0.00	59.9	
All Vehicles		1261	5.2	1261	5.2	0.405	0.0	NA	0.0	0.0	0.00	0.00	59.6	

Appendix C

TURN PATH PLANS



Lot 18 and 19 Alfred Road, Swanbourne
 10.5m Garbage Truck
 Truck Circulation

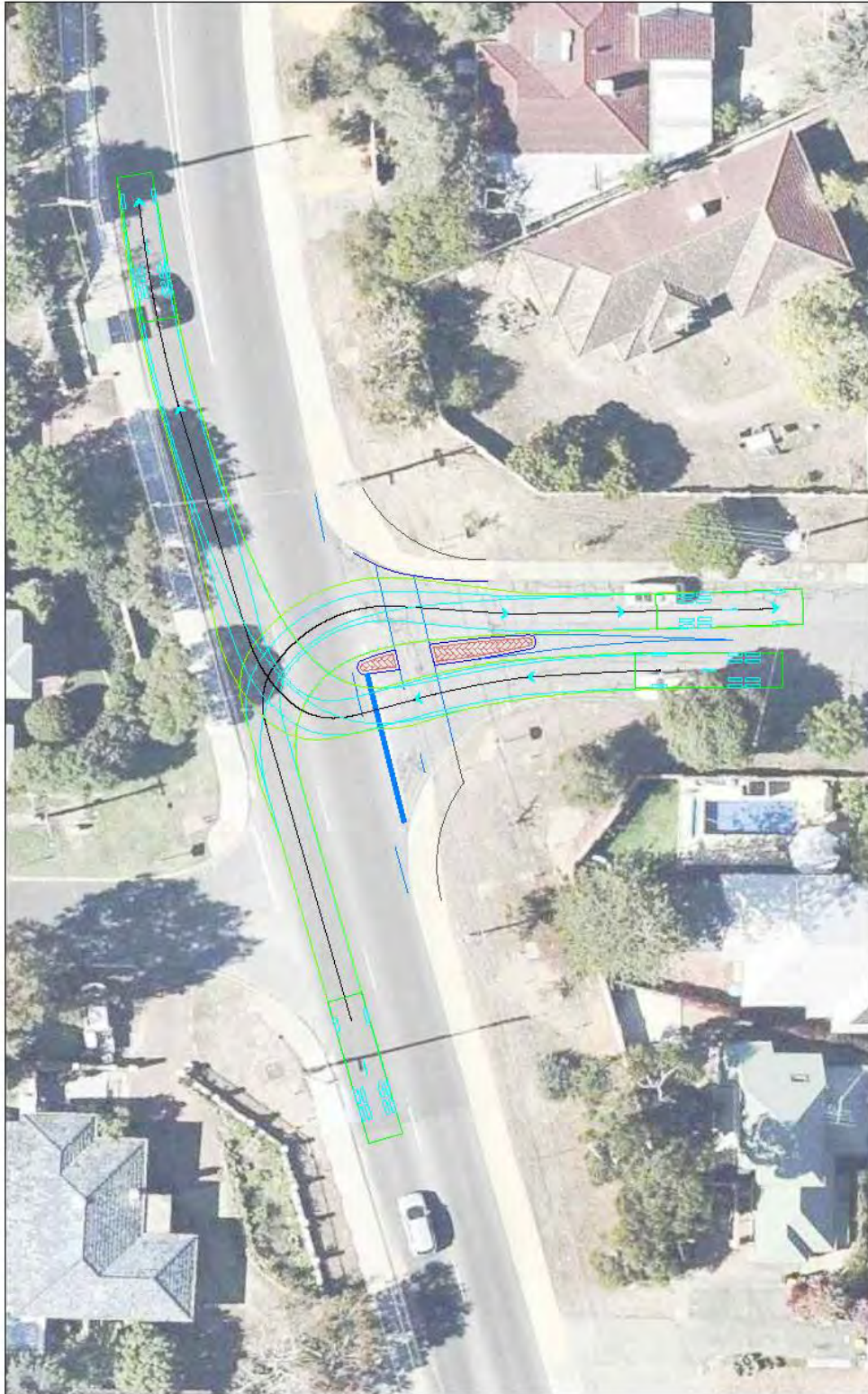
LEGEND

Vehicle Body
 Wheel Path



t19.039.sk03
 24/10/2019
 Scale: 1:250 @ A3





Lot 18 and 19 Alfred Road, Swanbourne
 10.5m Garbage Truck
 Truck Circulation

LEGEND

Vehicle Body
 Wheel Path



t19.039.sk05

24/10/2019

Scale: 1:250 @ A3



Appendix D

SISD SIGHTLINE ASSESSMENT PLAN



Lot 18 and 19 Alfred Road, Swanbourne
 Alfred Road and Butler Avenue Intersection
 Safe Intersection Sight Distance (SISD) = 95.0m Sightlines

t19.039.sk01
 20/06/2019
 Scale: 1:600 @ A3



PROPOSED CHILD CARE CENTRE

**162 – 164 ALFRED ROAD
SWANBOURNE**

ENVIRONMENTAL ACOUSTIC ASSESSMENT

NOVEMBER 2019

OUR REFERENCE: 25087-3-19081-02

DOCUMENT CONTROL PAGE

ENVIRONMENTAL ACOUSTIC ASSESSMENT
CHILD CARE CENTRE - SWANBOURNE

Job No: 19081-02

Document Reference : 25087-3-19081-02

FOR

ROWE GROUP

DOCUMENT INFORMATION				
Author:	Tim Reynolds	Checked By:	George Watts	
Date of Issue:	19 November 2019			
REVISION HISTORY				
Revision	Description	Date	Author	Checked
1	Clarification of outdoor play numbers relating to Noise Management and Child Supervision Policy	20/11/19	TR	N/A
2	Updated Plans	21/11/19	TR	N/A
DOCUMENT DISTRIBUTION				
Copy No.	Version No.	Destination	Hard Copy	Electronic Copy
1	1	Rowe Group Attn : Nathan Stewart Email : Nathan.Stewart@rowegroup.com.au		✓
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This report has been prepared in accordance with the scope of services and on the basis of information and documents provided to Herring Storer Acoustics by the client. To the extent that this report relies on data and measurements taken at or under the times and conditions specified within the report and any findings, conclusions or recommendations only apply to those circumstances and no greater reliance should be assumed. The client acknowledges and agrees that the reports or presentations are provided by Herring Storer Acoustics to assist the client to conduct its own independent assessment.

CONTENTS

1.	INTRODUCTION	1
2.	SUMMARY	1
3.	CRITERIA	2
4.	PROPOSAL	4
5.	MODELLING	4
6.	RESULTS	5
7.	ASSESSMENT	6
7.1	L _{A10} Noise Emissions	6
7.2	L _{A1} Noise Emissions	7
7.3	L _{AMax} Noise Emissions	7

APPENDICIES

A	Plan
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1. INTRODUCTION

Herring Storer Acoustics were commissioned to undertake an acoustic assessment of noise emissions associated with the revised design for the proposed child care centre to be located at 162 – 164 Alfred Road, Swanbourne.

This report assesses noise emissions from the premises with regards to compliance with the requirements of the *Environmental Protection (Noise) Regulations 1997*. For this development of a Child Care Centre, the noise sources considered as part of this assessment include :

- Mechanical Services; and
- Children within the outdoor play area.

We note that from information received from DWER, the bitumised area would be considered as a road, thus noise relating to the “propulsion and braking of motor vehicles is exempt from the *Environmental Protection (Noise) Regulations 1997*. We note that these noise sources are rarely critical in the determination of compliance. However, for completeness, they have been included in the assessment, for information purposes only.

For reference, a site plan of the proposed development is attached in Appendix A.

2. SUMMARY

From information supplied, we understand that the child care centre normal operating hours being 0700 and 1800 hours, Monday to Friday (closed on public holidays). It is understood that the centre would also be open, between the above times, 2 or 3 times per year on a Saturday. It is also understood that the proposed childcare centre will cater for a maximum of 65 children, including 8 babies.

It is noted that the Saturday day period has the same assigned noise levels as for Monday to Friday (excluding Public Holidays). Thus, noise received at the neighbouring residences from the child care centre needs to comply with the assigned day period noise level.

Noise received at the neighbouring premises from children playing in the outdoor areas would comply with the requirements of the *Environmental Protection (Noise) Regulations 1997*, for the proposed hours of operation, provided :

- the boundary walls to the east and south are 2 metres high; and
- the balustrade to the first floor outdoor play area needs to be 1.6 metres high.

Noise from cars, including closing of doors and engine start-up, would also comply with the relevant noise criteria.

Finally, although at this stage of the development the mechanical services have not been finalised, to achieve compliance at the neighbouring premises, the condensing units should be located near the bin store.

Thus, 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.

3. CRITERIA

The allowable noise level for noise sensitive premises in the vicinity of the proposed Facility site is prescribed by the *Environmental Protection (Noise) Regulations 1997*. Regulations 7 and 8 stipulate maximum allowable external noise levels or assigned noise levels that can be received at a premise from another premises. For residential premises, this noise level is determined by the calculation of an influencing factor, which is then added to the base levels shown below. The influencing factor is calculated for the usage of land within two circles, having radii of 100m and 450m from the premises of concern. The base assigned noise levels for residential premises are listed in Table 3.1.

TABLE 3.1 - BASELINE ASSIGNED OUTDOOR NOISE LEVEL

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L _{A10}	L _{A1}	L _{Amax}
Noise sensitive premises: highly sensitive area	0700 - 1900 hours Monday to Saturday (Day)	45 + IF	55 + IF	65 + IF
	0900 - 1900 hours Sunday and Public Holidays (Sunday / Public Holiday Day)	40 + IF	50 + IF	65 + IF
	1900 - 2200 hours all days (Evening)	40 + IF	50 + IF	55 + IF
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays (Night)	35 + IF	45 + IF	55 + IF

Note: L_{A10} is the noise level exceeded for 10% of the time.
L_{A1} is the noise level exceeded for 1% of the time.
L_{Amax} is the maximum noise level.
IF is the influencing factor.

It is a requirement that received noise be free of annoying characteristics (tonality, modulation and impulsiveness), defined below as per Regulation 9.

“impulsiveness” means a variation in the emission of a noise where the difference between L_{Apeak} and L_{Amax(Slow)} is more than 15 dB when determined for a single representative event;

“modulation” means a variation in the emission of noise that –

- (a) is more than 3 dB L_{AFast} or is more than 3 dB L_{AFast} in any one-third octave band;
- (b) is present for more at least 10% of the representative assessment period; and
- (c) is regular, cyclic and audible;

“tonality” means the presence in the noise emission of tonal characteristics where the difference between –

- (a) the A-weighted sound pressure level in any one-third octave band; and
- (b) the arithmetic average of the A-weighted sound pressure levels in the 2 adjacent one-third octave bands,

is greater than 3 dB when the sound pressure levels are determined as L_{Aeq,T} levels where the time period T is greater than 10% of the representative assessment period, or greater than 8 dB at any time when the sound pressure levels are determined as L_{ASlow} levels.

Where the noise emission is not music, if the above characteristics exist and cannot be practicably removed, then any measured level is adjusted according to Table 3.2 below.

TABLE 3.2 - ADJUSTMENTS TO MEASURED LEVELS

Where tonality is present	Where modulation is present	Where impulsiveness is present
+5 dB(A)	+5 dB(A)	+10 dB(A)

Note: These adjustments are cumulative to a maximum of 15 dB.

For this development, the closest residential premises of concern are located, as shown on Figure 3.1 below.



FIGURE 3.1 – AREA AROUND PROPOSED FACILITY

The neighbouring residences are shown in Figure 3.1. The neighbouring residences north, east and south east are within 100 metres of both Alfred Road and Rochdale Road, which are both secondary roads. Thus, the influencing factor for these residences would be +4 dB and the assigned noise levels would be as listed in Table 3.3. For the other neighbouring residences, being within 100 metres of Alfred Road, the Influencing Factor would be +2 dB and the assigned noise levels would be as listed in Table 3.4.

**TABLE 3.3 - ASSIGNED OUTDOOR NOISE LEVEL
NEIGHBOURING RESIDENCES TO NORTH, EAST AND SOUTH EAST**

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L _A 10	L _A 1	L _A max
Noise sensitive premises : Highly sensitive area	0700 - 1900 hours Monday to Saturday	49	59	69
	0900 - 1900 hours Sunday and Public Holidays	44	54	69
	1900 - 2200 hours all days	44	54	59
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays	39	49	59

Note: L_{A10} is the noise level exceeded for 10% of the time.
L_{A1} is the noise level exceeded for 1% of the time.
L_{Amax} is the maximum noise level.

**TABLE 3.4 - ASSIGNED OUTDOOR NOISE LEVEL
NEIGHBOURING RESIDENCES TO SOUTH AND WEST**

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L _A 10	L _A 1	L _A max
Noise sensitive premises : Highly sensitive area	0700 - 1900 hours Monday to Saturday	47	57	67
	0900 - 1900 hours Sunday and Public Holidays	42	52	67
	1900 - 2200 hours all days	42	52	57
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays	37	47	57

Note: L_{A10} is the noise level exceeded for 10% of the time.

L_{A1} is the noise level exceeded for 1% of the time.

L_{Amax} is the maximum noise level.

4. PROPOSAL

From information supplied, we understand that the child care centre normal operating hours being 0700 and 1800 hours, Monday to Friday (closed on public holidays). It is understood that the centre would also be open, between the above times, 2 or 3 times per year on a Saturday. It is also understood that the proposed childcare centre will cater for a maximum of 65 children, including 8 babies.

It is noted that the Saturday day period has the same assigned noise levels as for Monday to Friday (excluding Public Holidays). Thus, noise received at the neighbouring residences from the child care centre needs to comply with the assigned day period noise level.

For reference, a plan of the proposed development is attached in Appendix A.

5. MODELLING

Modelling of the noise propagation from the proposed development was carried out using an environmental noise modelling computer program, "SoundPlan". Calculations were carried out using the EPA worst case weather conditions as stated in the Environmental Protection Authority's "Draft Guidance for Assessment of Environmental Factors No.8 - Environmental Noise".

Noise emissions from the development, include:

- Mechanical Services.
- Car movements on Site.
- Car engine start and door closing.
- Children in Outdoor play area.

The calculations were based on the sound power levels listed in Table 5.1.

TABLE 5.1 – GENERAL SOUND POWER LEVELS

Item of Equipment	Sound Power Level, (dB(A))
Children Playing	83 (per 10 children)
Air Conditioning Condensing Units	4 @ 68
Cars moving	79
Car Start	85
Car Door	87

The above noise sources need to comply with the following assigned noise levels :

L _{A10}	-	Outdoor play and mechanical services.
L _{A1}	-	Car movements.
L _{AMax}	-	Car starts and doors closing.

With regards to noise emissions, the following are noted:

- 1 Noise associated with the mechanical services does not take into account any diversity of operation. Thus, this is a conservative assessment. At this stage of the project, the mechanical services have not been designed. Therefore, the noise sources have been based on designs used for the same or similar developments.
- 2 It has been assumed that the mechanical services would be located on the northern side of the development, near the bin store.
- 3 From the “Noise Management and Child Supervision Policy” for the proposed child care centre it is noted that during the morning period not all the children would be outside at the same time. However, during the afternoon period all the children could be outside at the same time. Thus, even though the noise emissions from babies and children below 3 years is less than the noise level stated in Table 5.1, being for the older children (ie 3 – 5 years), the acoustic modelling of outdoor play noise was, to be conservative, based on 6 groups of 10 children and one group for 5 children (which would have a sound power level of 80 dB(A)) with sound power levels distributed as plane sources.
- 4 Noise modelling was also based on the boundary fencing being 2 metres high. Additionally, to control noise ingress of road traffic noise to the first floor outdoor space, the balustrading was modelled at 1.6 metre high.

Thus, noise modelling was undertaken to the neighbouring premises, as shown on Figure 3.1. To simplify the analysis, only the results for the worst case locations have been listed.

6. RESULTS

The results of the noise modelling are listed in Table 6.1.

From previous measurements, noise emissions from children playing is a broadband noise and does not contain any annoying characteristics. Noise emissions from the mechanical services could be tonal. However, given the usage of the child care centre (ie day period) and the proximity to Alfred Road, noise received at the neighbouring residences from the mechanical services is unlikely to contain any annoying characteristics. Even so, to be conservative, a +5 dB(A) penalty, as shown in Table 6.1, has been applied to noise received at the neighbouring residences from the mechanical services.

Based on the definitions of tonality, noise emissions from car movements and cars starting, being an L_{A1} and an L_{AMax} respectively and present for less than 10% of the time, would not be considered tonal. However, the closing of a car door could be impulsive, thus a +10 dB(A) penalty, as shown in Table 6.1, has been applied to noise received at the neighbouring residences from the car doors.

TABLE 6.1 – CALCULATED NOISE LEVELS

Location	Noise Source / Calculated Noise Levels (dB(A))				
	Outdoor Play	Mechanical Services	Car Movement	Car Start	Car Door
Residences to North	42	34 (39)	40	43	44 [54]
Residence to East	47	25 (30)	32	34	36 [46]
Residence to South East	44	10 (15)	29	24	25 [35]
Residence to South	46	18 (23)	36	36	38 [48]
Residence to West	41	31 (36)	41	44	45 [55]

() Includes +5 dB(A) penalty of a tonal component

[] Includes +10 dB(A) penalty for impulsiveness

7. ASSESSMENT

The assessment for the noise sources that are required to achieve compliance are outlined below.

7.1 L_{A10} NOISE EMISSIONS

Tables 7.1 and 7.2 summarise the applicable Assigned Noise Levels, and assessable noise level emissions associated for the sources needing to comply with the L_{A10} criteria.

TABLE 7.1 – ASSESSMENT OF L_{A10} NOISE LEVEL FOR OUTDOOR PLAY

Location	Assessable Noise Level, dB(A)	Applicable Times of Day	Applicable Assigned L _{A10} Noise Level (dB)	Exceedance to Assigned Noise Level (dB)
Residences to North	42	Day Period	49	Complies
Residence to East	47	Day Period	49	Complies
Residence to South East	44	Day Period	49	Complies
Residence to South	46	Day Period	47	Complies
Residence to West	41	Day Period	47	Complies

TABLE 7.2 – ASSESSMENT OF L_{A10} NOISE LEVEL FOR MECHANICAL SERVICES

Location	Assessable Noise Level, dB(A)	Applicable Times of Day	Applicable Assigned L _{A10} Noise Level (dB)	Exceedance to Assigned Noise Level (dB)
Residences to North	39	Day Period	49	Complies
Residence to East	30	Day Period	49	Complies
Residence to South East	15	Day Period	49	Complies
Residence to South	23	Day Period	47	Complies
Residence to West	36	Day Period	47	Complies

7.2 L_{A1} NOISE EMISSIONS

Tables 7.3 summarises the applicable Assigned Noise Levels, and assessable noise level emissions for car movements.

TABLE 7.3 – ASSESSMENT OF L_{A1} NOISE LEVEL EMISSIONS FOR CAR MOVEMENTS

Source	Assessable Noise Level, dB(A)	Applicable Times of Day	Applicable Assigned L _{A1} Noise Level (dB)	Exceedance to Assigned Noise Level (dB)
Residences to North	40	Day Period	59	Complies
Residence to East	32	Day Period	59	Complies
Residence to South East	29	Day Period	59	Complies
Residence to South	36	Day Period	57	Complies
Residence to West	41	Day Period	57	Complies

7.3 L_{AMAX} NOISE EMISSIONS

Tables 7.4 and 7.5 summarises the applicable Assigned Noise Levels, and assessable noise level emissions for car starts and car doors closing.

TABLE 7.3 – ASSESSMENT OF L_{AMAX} NOISE LEVEL EMISSIONS FOR CAR START

Source	Assessable Noise Level, dB(A)	Applicable Times of Day	Applicable Assigned L _{AMAX} Noise Level (dB)	Exceedance to Assigned Noise Level (dB)
Residences to North	43	Day Period	69	Complies
Residence to East	34	Day Period	69	Complies
Residence to South East	24	Day Period	69	Complies
Residence to South	36	Day Period	67	Complies
Residence to West	44	Day Period	67	Complies

TABLE 7.4 – ASSESSMENT OF L_{AMAX} NOISE LEVEL EMISSIONS FOR CAR DOOR

Source	Assessable Noise Level, dB(A)	Applicable Times of Day	Applicable Assigned L _{AMAX} Noise Level (dB)	Exceedance to Assigned Noise Level (dB)
Residences to North	54	Day Period	69	Complies
Residence to East	46	Day Period	69	Complies
Residence to South East	35	Day Period	69	Complies
Residence to South	48	Day Period	67	Complies
Residence to West	55	Day Period	67	Complies

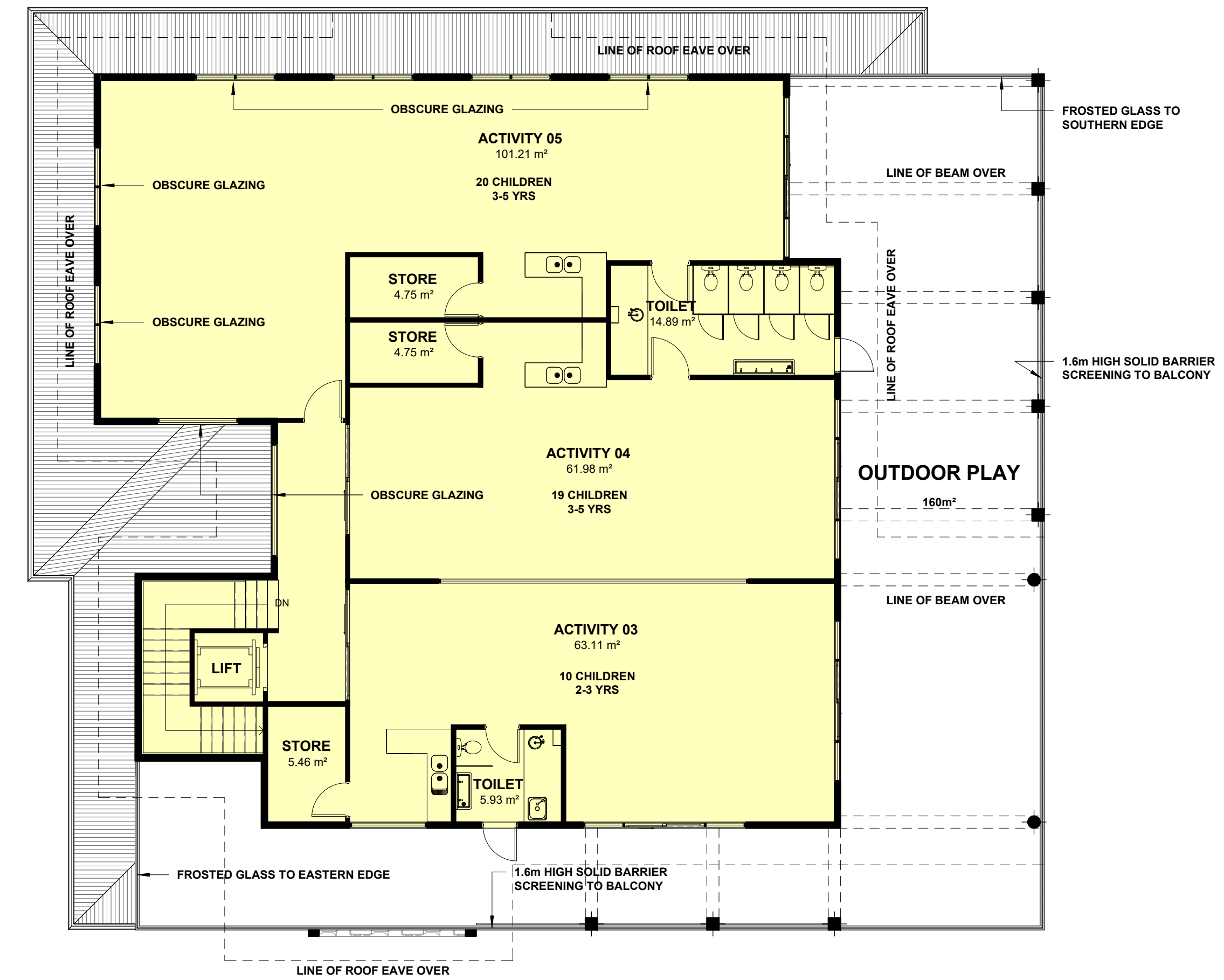
Note : Noise from cars doors closing would also comply during the night period. Thus, the noise received at the neighbouring residences from staff arriving prior to 0700 hours would also be compliant with the regulatory requirements.

Noise received at the neighbouring premises from children playing in the outdoor areas would comply with the requirements of the *Environmental Protection (Noise) Regulations 1997*, for the proposed hours of operation, provided :

- the boundary walls to the east and south are 2 metres high; and
- the balustrade to the first floor outdoor play area needs to be 1.6 metres high.

APPENDIX A

PLAN



FIRST FLOOR PLAN
SCALE: 1 : 100

SITE CRITERIA

1. SITE AREA	1850.5m ²
2. LANDSCAPING	
a. LANDSCAPING REQUIRED	N/A
b. LANDSCAPING PROVIDED	663m ² (35% OF SITE)
3. FLOOR AREA	
a. CHILD CARE CENTRE GF	328m ²
b. CHILD CARE CENTRE FF TOTAL	307m ² 635m ²
4. CAR PARKING	
a. REQUIRED	
i. 1 PER 5 CHILDREN	13 CAR BAYS
ii. 0.5 PER STAFF (12 STAFF)	6 CAR BAYS
b. PROVIDED	19 CAR BAYS

Landscaping
A. Hard Landscaping
Defined as paved walkways either open or covered.
B. Soft Landscaping
Defined as vegetative landscaping.
Gross Floor Area: GFA
A. All Floor Areas on this plan are shown as GROSS FLOOR AREA.
Unless otherwise noted as Net Floor Area.
B. Definition of Gross Floor Area is defined as:
i. GROSS FLOOR AREA OF TENANCY:
Gross Floor Area of an individual Tenancy is defined as the area contained between the centre line of common tenancy walls and the outside edge of external walls.
ii. GROSS FLOOR AREA OF A BUILDING:
Gross Floor Area of a Building is defined as the total area contained between the outside edge of external walls.
Net Floor Area: NFA
A. Net Floor Area of a Tenancy on this plan is defined as the area between external or tenancy dividing walls.
B. This area is inclusive of toilets if the toilets are exclusive to the Tenancy.

CHILDCARE CENTRE
LOCATION:162 & 164 ALFRED ROAD, SWANBOURNE
FOR:SHARON PROPERTY PTY. LTD.

PROPOSED CHILD CARE CENTRE

**162 – 164 ALFRED ROAD
SWANBOURNE**

TRAFFIC NOISE INGRESS ACOUSTIC ASSESSMENT

NOVEMBER 2019

OUR REFERENCE: 25090-2-19081-02

DOCUMENT CONTROL PAGE

NOISE INGRESS ACOUSTIC ASSESSMENT
CHILD CARE CENTRE – ALFRED ROAD, SWANBOURNE

Job No: 19081-02

Document Reference: 25090-2-19081-02

FOR

ROWE GROUP

DOCUMENT INFORMATION				
Author:	Tim Reynolds	Checked By:	George Watts	
Date of Issue :	20 November 2019			
REVISION HISTORY				
Revision	Description	Date	Author	Checked
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CONTENTS

1.	INTRODUCTION	1
2.	SUMMARY	1
3.	CRITERIA	2
4.	MEASUREMENTS	2
5.	MODELLING	2
6.	ASSESSMENT	3

APPENDICIES

A	Child Care Centre Plans
B	Noise Monitoring

1. INTRODUCTION

Herring Storer Acoustics was commissioned to undertake a noise ingress assessment for the proposed child care centre to be located at 162 – 164 Alfred Road, Swanbourne with regards to vehicles travelling along Alfred Road. The acoustic assessment is to comply with the requirement of State Planning Policy 5.4 *“Road and Rail Transport Noise and Freight Considerations in Land Use Planning”* (SPP5.4).

Although, Alfred Road is not considered as a major road and would not require any acoustical assessment under State Planning Policy 5.4, it is understood that council has requested a noise ingress assessment be undertaken. As part of this assessment, the following was carried out:

- Monitor noise levels received at the development site.
- Determine by modelling, the noise that would be received at the child care centre from traffic on Alfred Road.
- Assess the predicted noise levels for compliance with the appropriate criteria.
- If exceedances are predicted, comment on possible noise amelioration options for compliance with the appropriate criteria.

For information, plans for the child care centre are attached in Appendix A.

2. SUMMARY

It is noted that the child care centre is only occupied during the day period, thus under State Planning Policy 5.4 *“Road and Rail Transport Noise and Freight Considerations in Land Use Planning”* only the criteria for the day period is applicable.

For the “sleep” rooms, the internal criteria would be 35 dB(A). For other rooms, such as the activity rooms, the internal acoustic criteria would be 40 dB(A).

The “sleep” rooms are positioned on the southern side of the development, away from Alfred Road. Given the design of the child care centre and the barrier requirements for the first floor balustrade, with the exception of the northern glazing to activity room 4, that requires 6mm toughened glass, no upgrade in construction (ie “Quiet” house design) is required to achieve compliance with the internal criteria within the activity rooms.

Based on the noise modelling undertaken, noise received within the outdoor areas would exceed the external acoustic criteria of an $L_{Aeq(Day)}$ of 55 dB(A). Under the policy, the noise received at the outdoor area need to be reduced with an aim of achieving compliance with the external criteria as far as practical. To comply with this requirement, the barriers as shown on Figure 5.1 in Section 6 are required.

3. CRITERIA

It is noted that the Child Care Centre is only occupied during the day period, thus under State Planning Policy 5.4 *“Road and Rail Transport Noise and Freight Considerations in Land Use Planning”* only the criteria for the day period is applicable.

Under the policy, the external acoustic criteria for this development would be an $L_{Aeq(Day)}$ of 55dB(A). With regards to the policy, this criteria is to provide “a reasonable degree of acoustic amenity for living areas on each residential lot”. The policy recognises that “it may not be practicable to meet the outdoor noise targets”.

We also note that under the policy, there is an internal criteria that should also be achieved. Under the Policy, for non-residential noise sensitive premises, internal noise levels should meet the design sound levels as listed in Table 1 of AS/NZ 2107:2000 “Acoustics – Recommended design sound levels and reverberation times for building interiors”. Under AS 2017, the internal criteria would :

Sleep Rooms	-	$L_{Aeq(Day)}$ of 35 dB(A).
Play Rooms	-	$L_{Aeq(Day)}$ of 40 dB(A).

For the “sleep” room, the internal criteria would be 35 dB(A). For other rooms, such as the activity rooms, the internal acoustic criteria would be 40 dB(A).

4. MEASUREMENTS

To determine the noise that would be received at the proposed child care centre from vehicles travelling along the roads, noise data logging was undertaken on the site. The noise monitoring was carried out between Wednesday 13th November and Tuesday 19th November 2019. However, an error occurred in the monitor on Saturday 16th November and only 2 days of monitoring was recorded. However, as shown by the results attached as Figure B1 in Appendix B, the noise levels recorded during the day period were relatively constant, thus this monitoring would be considered valid and was used in the assessment. A summary of the noise level recorded are listed in Table 4.1.

TABLE 4.1 - SUMMARY OF MEASURED NOISE LEVELS

$L_{Aeq,Day}$ (6am to 10pm)	(Operating Hours) $L_{Aeq,(7am to 6pm)}$
64.7	65.2

Note : The noise monitor was located in front of 162 Alfred Road, at 7 metres from the edge of Alfred Road.

5. MODELLING

To determine the noise received at the child care centre from vehicles travelling along Alfred Road, noise modelling was carried out using SoundPlan, in accordance with the “Implementation Guidelines” for the State Planning Policy 5.4.

Ground contours were as obtained from Google Earth.

Noise modelling was undertaken based on the plans attached in Appendix A.

Traffic flows obtained from the MRWA traffic map and used in the noise model for Alfred Road was 11,647 vehicles per day (vpd).

Using the noise levels as listed in Table 4.1 for assessment purposes, to comply with the external acoustic criteria, as practicable as possible, the barriers, as shown on Figure 5.1 are required.

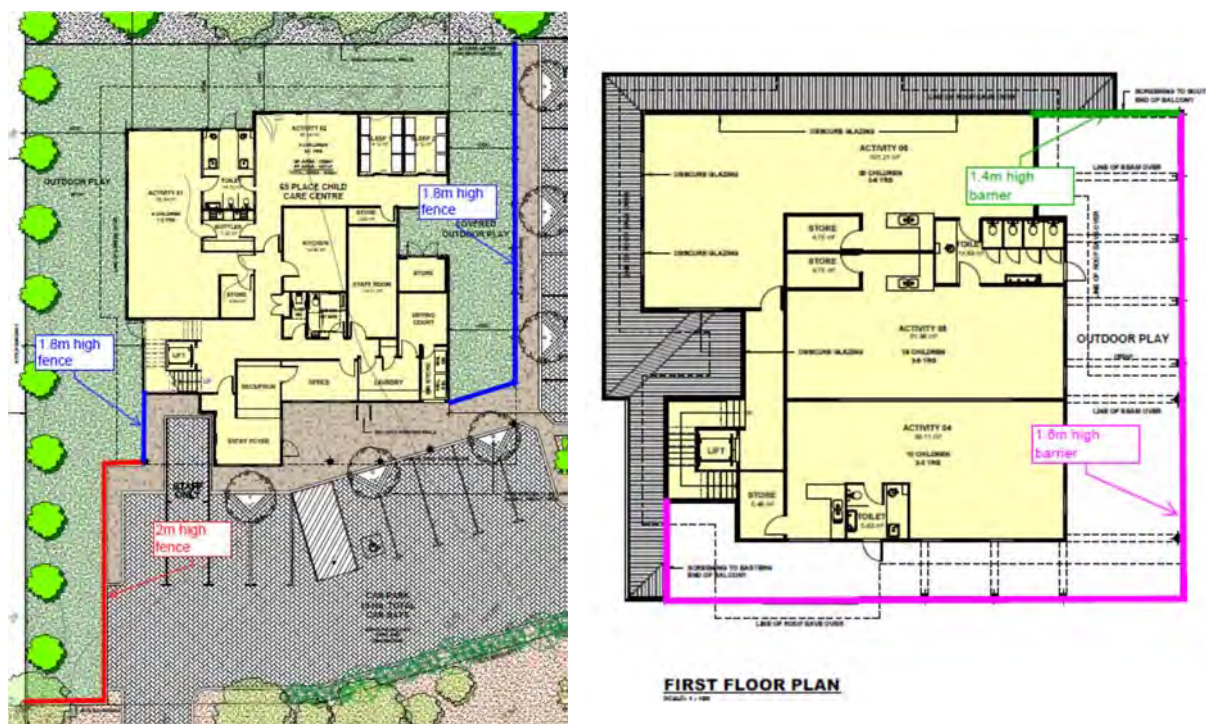


FIGURE 5.1 – RECOMMENDED BARRIERS

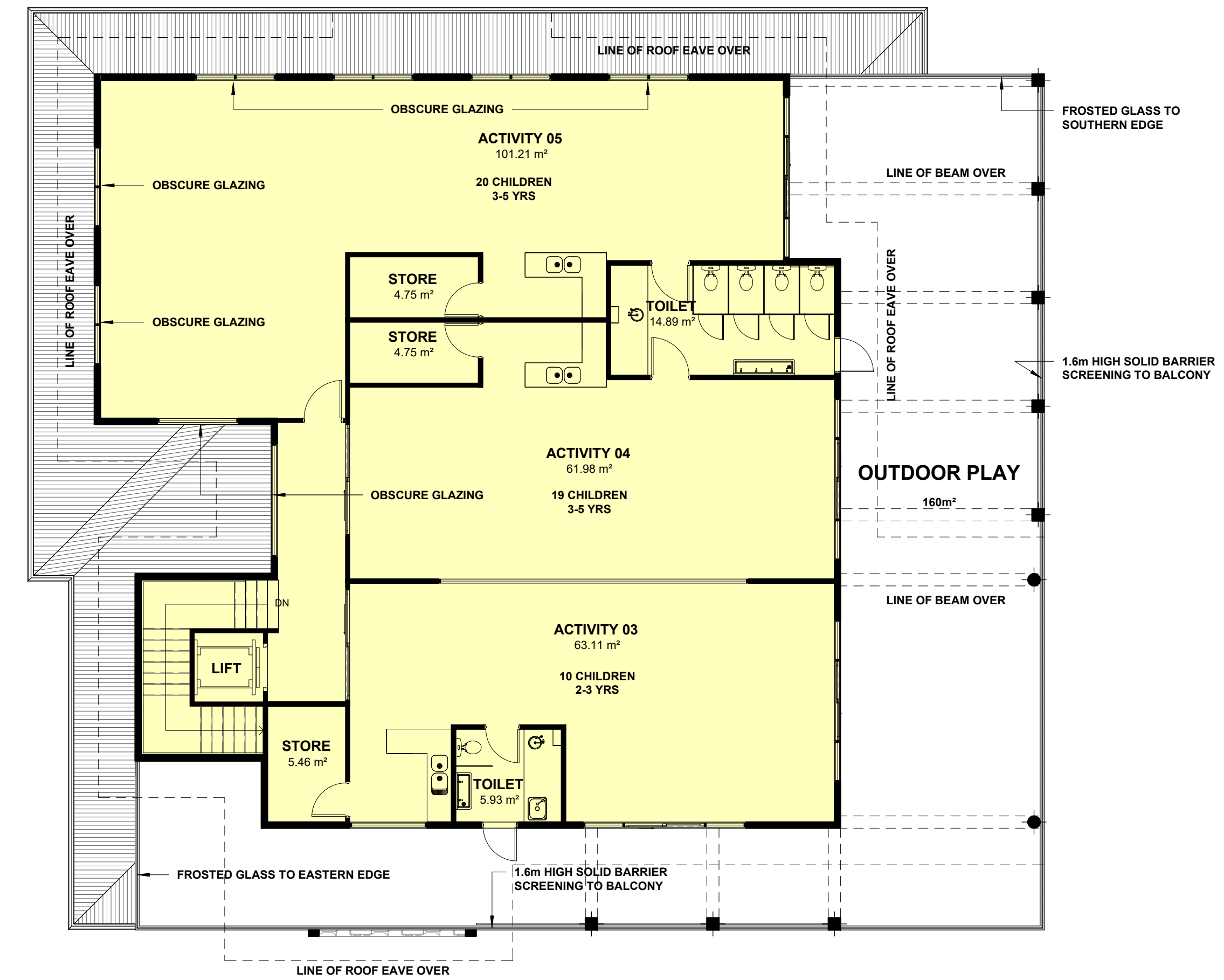
6. ASSESSMENT

With the walls / barriers installed as shown of Figure 5.1, noise received at the outdoor areas of the child care would be considered compliant with the external acoustical criteria.

With regards to noise ingress to within the child care, we note that for the ground floor, activity rooms 1 and 2 and the sleep rooms have been located on the southern side of the development. Thus, compliance with the internal criteria can be achieved with standard constructions. For the first floor, with the 1.6m high balustrading (as shown on Figure 5.1) the internal acoustic criteria can be achieved with standard construction, with the exception of the glazing to the northern side of activity room 4. For the noise received within activity room 4 to comply with the internal acoustic criteria, the glazing to this room is to be 6mm toughened glass.

APPENDIX A

PLANS



FIRST FLOOR PLAN
SCALE: 1 : 100

SITE CRITERIA

1. SITE AREA	1850.5m ²
2. LANDSCAPING	
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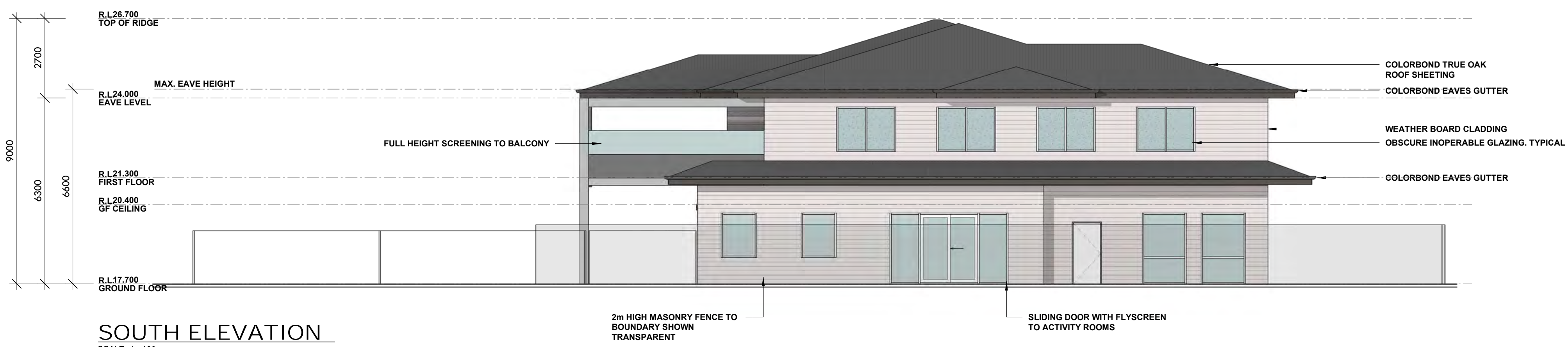
CHILDCARE CENTRE
LOCATION:162 & 164 ALFRED ROAD, SWANBOURNE
FOR:SHARON PROPERTY PTY. LTD.



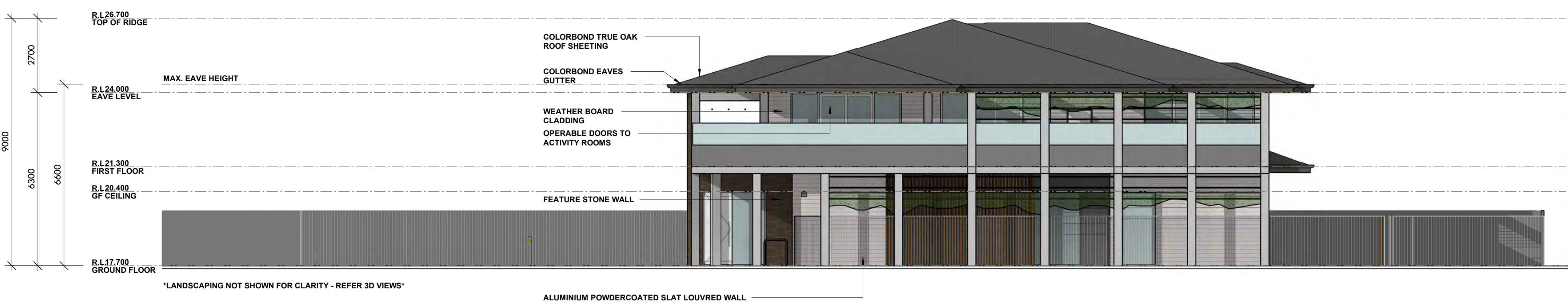
NORTH ELEVATION
SCALE: 1:100



EAST ELEVATION
SCALE: 1:100



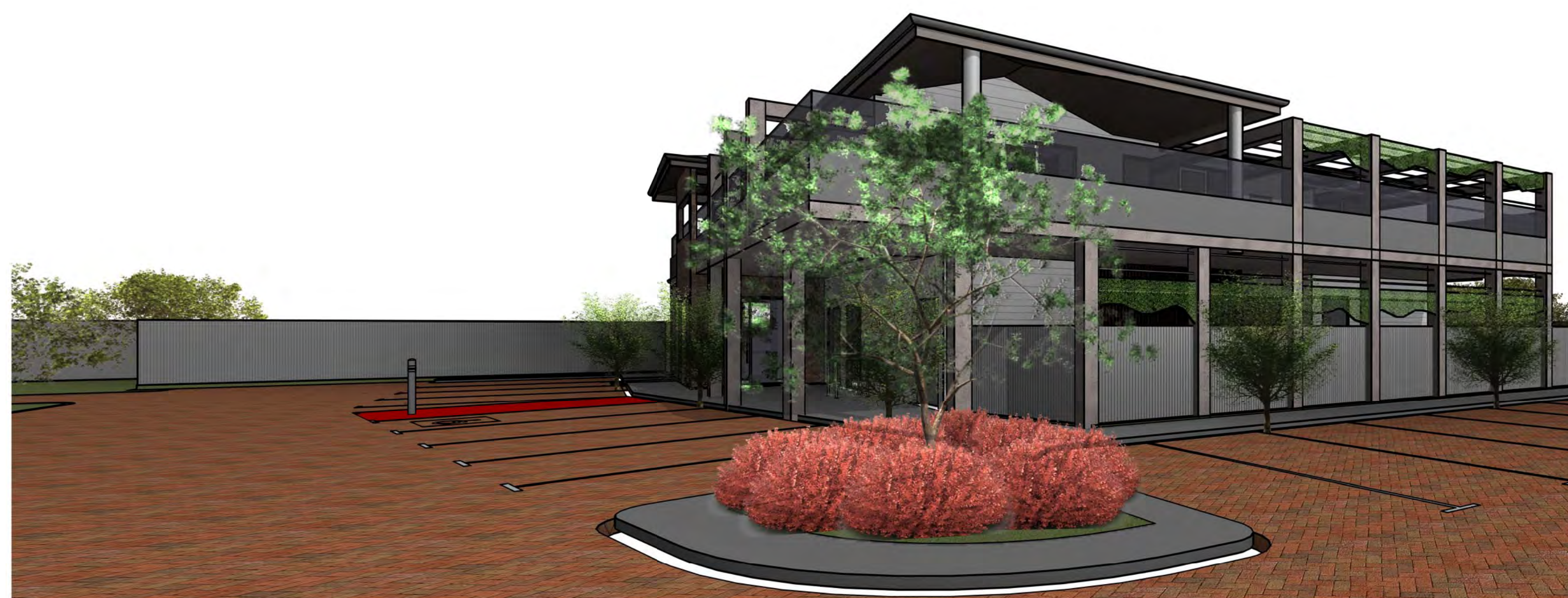
SOUTH ELEVATION
SCALE: 1:100



WEST ELEVATION
SCALE: 1:100



VIEW FROM BUTLER AVE
SCALE:



SOME TREES IN LANDSCAPE BUFFER ZONE NOT SHOWN FOR CLARITY

CHILDCARE CENTRE
LOCATION: 162 & 164 ALFRED ROAD, SWANBOURNE
FOR: SHARON PROPERTY PTY. LTD.

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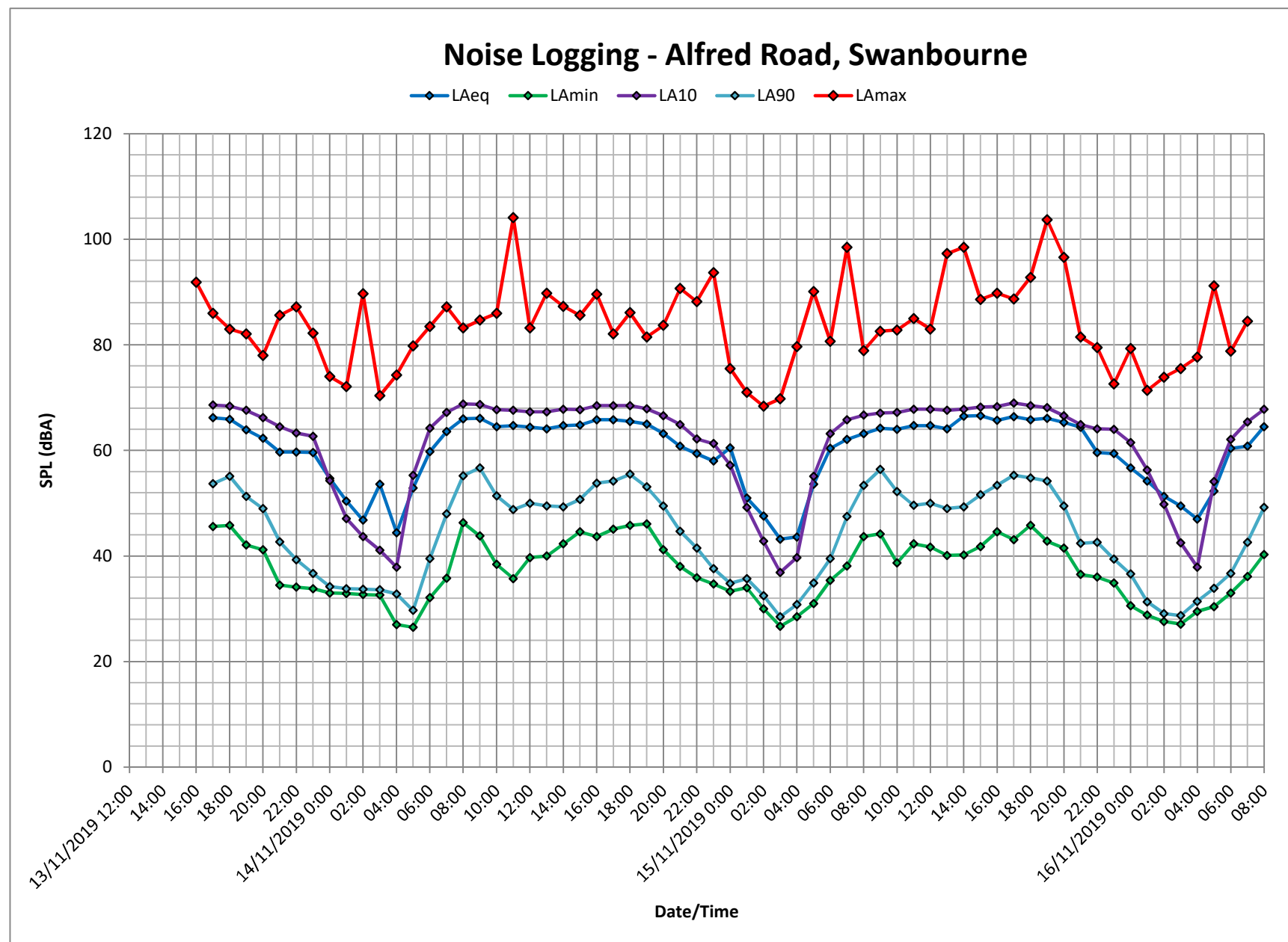
meYer 55 YEARS
architects 1963|2018



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APPENDIX B

NOISE MONITORING



Noise Management and Child Supervision Policy

Atlantis Group

**Child Care Centre at Lots 18 and 19 (No. 162 and
164) Alfred Road, Swanbourne**

1. INTRODUCTION

The following information has been prepared support of a proposed child care centre at Lots 18 and 19 (No. 162 and 164) Alfred Road, Swanbourne ('the subject site'). The purpose of this Noise Management and Child Supervision Policy ('the Policy') is to outline how and when children will play outside during both the summer and winter months. This Policy will ensure potential impacts on adjoining properties from the playing of children in the outdoor areas at the subject site are minimised.

This Policy has been prepared in collaboration of Rowe Group, Atlantis Group and Herring Storer Acoustics and to ensure the number of children playing outside at any given time are in line with the recommendations of the Acoustic Consultant (Herring Storer Acoustics).

2. NOISE MANAGEMENT PLAN

The following section outlines when children will be allowed to play outside during both the summer and winter months.

In considering the following management strategies, it should be noted that the following times may vary slightly due to UV levels on any given day.

In addition, all rooms and age groups are encouraged but not forced to participate in outdoor play. Outdoor play is run with a free flow philosophy, whereby the children can flow between indoor and outdoor areas. Educators are in place to monitor the number of children accessing both areas to ensure that the maximum number of children allowed outside at any one time is not exceeded.

Southern Outdoor Play Space

Summer:

The children in room Activity 01 (up to eight (8)) will be outside from 7.00am to 8.00am, before the UV levels get to high. Between 8.00am to 9.00am, the Activity 06 children will be outside. After lunch and once the UV level drops, the Activity 06 children will be outside from 2.30pm to 4.30pm.

Winter:

The children in room Activity 01 (up to eight (8)) will be outside from 8.00am to 9.00am, before the UV levels get to high. Between 9.00am to 10.00am, the Activity 06 children will be outside. After lunch and once the UV level drops, the Activity 06 children will be outside from 3.00pm to 5.00pm.

Eastern Outdoor Play Space

Summer:

The children in room Activity 05 will be outside from 7.00am to 8.00am, before the UV levels get to high. Between 8.00am to 9.00am, the Activity 06 children will be outside. After lunch and once the UV level drops, the Activity 05 children will be outside from 2.30pm to 4.30pm.

Winter:

The children in room Activity 05 will be outside from 8.00am to 9.00am, before the UV levels get to high. Between 9.00am to 10.00am, the Activity 06 children will be outside. After lunch and once the UV level drops, the Activity 05 children will be outside from 3.00pm to 5.00pm.

Western Covered Outdoor Play Space

Summer:

Nursery children (0-1 years) (up to eight (8)) will be outside from 7.00am to 8.00am, before the UV levels get too high. After lunch and once the UV levels drop, the Nursery children will access outside area from 2.30pm to 3.30pm.

Winter:

Nursery children (0-1 years) (up to eight (8)) will be outside from 9.00am to 10.00am, before the UV levels get too high. After lunch and once the UV levels drop, the Nursery children will access outside area from 2.00pm to 3.00pm.

First Floor Outdoor Play Space

Summer:

The children in room Activity 04 will be outside from 7.00am to 8.00am, before the UV levels get to high. After lunch and once the UV levels drop, the Activity 01 and 04 children will access the first floor outside area from 2.30pm to 4.30pm.

Winter:

The children in room Activity 04 will be outside from 8.00am to 9.00am, before the UV levels get to high. After lunch and once the UV levels drop, the Activity 01 and 04 children will access the first floor outside area from 3.00pm to 5.00pm.

The following table summarises where each outdoor play space will be used and by which age group:

Summer:

TIME	SOUTHERN PLAY SPACE	EASTERN PLAY SPACE	WESTERN PLAY SPACE	FIRST FLOOR PLAY SPACE
7.00AM TO 7.30AM	Activity 01	Activity 05	Nursery	Activity 04
7.30AM TO 8.00AM				
8.00AM TO 8.30AM	Activity 06	Activity 06		
8.30AM TO 9.00AM				
9.00AM TO 9.30AM				
9.30AM TO 10.00AM				
10.00AM TO 10.30AM				
10.30AM TO 11.00AM				
11.00AM TO 11.30AM				
11.30AM TO 12.00PM				
12.00PM TO 12.30PM				
12.30PM TO 1.00PM				
1.00PM TO 1.30PM				
1.30PM TO 2.00PM				
2.00PM TO 2.30PM				
2.30PM TO 3.00PM	Activity 06	Activity 05	Nursery	Activity 01 and 04
3.00PM TO 3.30PM				
3.30PM TO 4.00PM				
4.00PM TO 4.30PM				
4.30PM TO 5.00PM				
5.00PM TO 5.30PM				
5.30PM TO 6.00PM				

Winter:

TIME	SOUTHERN PLAY SPACE	EASTERN PLAY SPACE	WESTERN PLAY SPACE	FIRST FLOOR PLAY SPACE
7.00AM TO 7.30AM				
7.30AM TO 8.00AM				
8.00AM TO 8.30AM	Activity 01	Activity 05	Nursery	Activity 04
8.30AM TO 9.00AM				
9.00AM TO 9.30AM	Activity 06	Activity 06		
9.30AM TO 10.00AM				
10.00AM TO 10.30AM				
10.30AM TO 11.00AM				
11.00AM TO 11.30AM				
11.30AM TO 12.00PM				

TIME	SOUTHERN PLAY SPACE	EASTERN PLAY SPACE	WESTERN PLAY SPACE	FIRST FLOOR PLAY SPACE
12.00PM TO 12.30PM				
12.30PM TO 1.00PM				
1.00PM TO 1.30PM				
1.30PM TO 2.00PM				
2.00PM TO 2.30PM				
2.30PM TO 3.00PM				
3.00PM TO 3.30PM	Activity 06	Activity 05	Nursery	Activity 01 and 04
3.30PM TO 4.00PM				
4.00PM TO 4.30PM				
4.30PM TO 5.00PM				
5.00PM TO 5.30PM				
5.30PM TO 6.00PM				

3. MANAGEMENT STRATEGIES AND CHILD SUPERVISION POLICIES

The outdoor play area will be designed with key equipment located close to the building, to encourage children to play away from the boundary fences.

Whilst we encourage free play, groups of children playing close to the boundary fences will be redirected away from the fences. Staff supervision points will include the outer perimeter of the play areas to ensure noise levels at the boundary are kept to a minimum.

At no time are children allowed to bang on the fencing on the southern and eastern boundaries. Any child banging on the fence will be immediately redirected to another area of the play area and encouraged to participate in an alternative activity. The use of loud musical instruments such as drums, bells, whistles etc. is prohibited from the outdoor play spaces. Any children bringing instruments outside will be requested to return them to inside immediately.

A landscaped buffer between the building and the southern boundary is also proposed to further mitigate noise.

All staff will be educated of the above policies and management strategies upon induction at the Centre.

Submissions Received	
Submission address and comment	Officer Comment
<p>1. 54 Mayfair Street, Mt Claremont My comments on the need to reject the Child Care Centre application still apply despite any planning changes.</p>	<p>Noted. It is considered that the proposed modifications to the application to slightly reduce the scale is likely to still result in a negative impact on the residential amenity of the locality as discussed in the body of the report.</p>
<p>2. No address given I refer to the recently published plans and the very short time allowed for those affected, by the large scale commercial development, to comment. I comment below as a local resident who really, sincerely wishes to see negative impacts solely for developer commercial profit, such as this, stopped when the impact on the residents is so large. There is NO residential benefit here for those people living nearby. It will make their lives a complete misery. Just not fair. Labour governments are supposed to be caring for the established community, thereby not allowing it to be destroyed.</p> <p>1. It is NOT reasonable to negatively impact an established residential area.</p> <p>2. The scale is too large with inadequate parking/access provision.</p> <p>3. On street parking is assumed. Why should people have all those vehicles outside their homes all day and every day?</p> <p>4. Service vehicles are to be small scale. How can you police that and insist on it when operating the centre. Clearly large vehicles will be give a major impact daily</p> <p>5. No off-street space for deliveries or vehicle turning.</p> <p>6. Emergency access insufficient</p>	<p>Noted. The brief comment period was as a result of the SAT and JDAP timeframe requirements meaning that Council had to consider the proposal at its meeting on 17 December 2019.</p> <p>Being an 'SA' land use it is considered the large scale Child Care Centre is not an appropriate land use on this site and may negatively impact on the current neighbourhood amenity. This is discussed in detail in the report.</p> <p>It is considered that the proposed modifications to the application are likely still result in a negative impact on the residential amenity of the locality.</p> <p>Parking complies with LPP 206 – Child Care Centres, however the hardstand area is disproportionately large and not consistent with a residential streetscape, which may impact on the current residential amenity.</p> <p>Should the JDAP approve the development a condition can be recommended that the hours of service vehicles be limited to 10.00am to 3.00pm to limit the negative impact on residential amenity, as discussed in the report.</p> <p>Noted, however the proposed through access doesn't necessarily require turning on site.</p> <p>Emergency access will be required to comply with BCA and Child Care Regs requirements.</p>

<p>7. Exit and entrances too narrow for the types of vehicle that will need access. Access queues will occur and the number of vehicles arriving and leaving have been very much under estimated to suit the developer.</p> <p>8 Major under estimate of the number and type of vehicles accessing the site each day.</p> <p>9. Playgrounds will generate major noise levels close to existing boundary houses to an intolerable level.</p> <p>10. This is (#9) obvious when the noise management plan calls for more outside staff to stop children doing what is natural. Such as playing, shouting, making a noise, screaming, banging on fences, etc., The supervision controls plan clearly recognises that children will have to be controlled beyond the norm because all playgrounds are too close to existing houses and the area is too small for proper playing. In other words this centre would be in the wrong place!</p> <p>11. Sound ingress monitoring was insufficient, monitoring execution having been cut short.</p> <p>12. Double glazing is required for energy and noise efficiencies. Glass barriers do not work nor do brick walls.</p> <p>13. Food cooking and waste smells will be obvious.</p> <p>14. Mechanical services such as heating and cooling equipment impacts have not been assessed. Sound proofing provision must be installed</p> <p>15. Visual impact is massive in that 20 cars will be visible from the street all day and everyday . Screening provision is poor.</p>	<p>The Town has concerns that the TIS has not adequately addressed likely trip routes and may have underestimated queuing.</p> <p>See above.</p> <p>Noise may impact on the residential amenity of the locality. Should the JDAP approve the development a condition can be included on any approval that the noise mitigation requirements of the acoustic reports be implemented, including the Noise Management Plan. However it is considered the playground adjacent to the eastern boundary should be relocated or redesigned. This has been included as a recommended condition should the application be approved.</p> <p>Noted.</p> <p>See above, noise mitigation construction can be recommended as a condition should the application be approved.</p> <p>The Acoustic consultant has recommended 6mm glazing to the activity room fronting Alfred Road and balcony to mitigate noise into these areas.</p> <p>Noted. Any odours may have a negative impact on residential amenity.</p> <p>Noted, impacts from mechanical services can be addressed via acoustic screening.</p> <p>Noted. Screening vegetation has been proposed however it is considered that the large hardstand of the car parking will have a detrimental impact on visual amenity.</p>
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<p>16. Environmental impact is unacceptable for a residential area. Drainage and sewer impacts will arise.</p> <p>17. Each peak hour arrival and departure period will create back ups and raise risk for accidents because the site location, with poor access and space is in the WRONG place.</p> <p>18. The building is too high relative to the existing properties.</p> <p>I request this building venture be rejected and houses in keeping with the surrounding area be allowed only.</p>	<p>Development will need to be connected to reticulated sewerage.</p> <p>It is considered the TIS inputs may be flawed and that significant impacts on the local road traffic may occur, resulting in adverse impacts on residential amenity. It is of concern that trip continuation has not been rigorously analysed and reflected in the TIS.</p> <p>The larger building is not commensurate with accommodating 65 children, being in the order of 50% larger in internal play areas than necessary. The added bulk from the extra unnecessary floor area may impact negatively on the residential amenity of the locality.</p> <p>The site is residential and the large scale development is not consistent with the neighbourhood context and is likely to have a significant detrimental impact on the current residential amenity.</p>
<p>3. 31 Mayfair Street, Mt Claremont We strongly oppose the application for a childcare facility on this site for the following reasons:</p> <p>1. During peak traffic conditions (7.30 to 9.30pm and 3-6pm), including Swanbourne school drop off and pick up periods, this section of Alfred Road is extremely congested and dangerous. A child care facility will not only increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school. It is for that very reason, the City of Nedlands established cross walking lights at the Alfred and Rochdale intersection in recognition of the congestion and improve the safety of pedestrians/bike riders.</p> <p>2. The families attending the proposed day care will also be at risk due to the parking constraints.</p> <p>3. I am an owner/occupier on Mayfair street and often have long wait periods before the traffic is clear to exit my street. In many cases, those clearance windows are so short, I have to really power my vehicle to exit</p>	<p>Noted.</p> <p>It is considered the proposed development may exacerbate traffic volumes with an adverse effect on safety due to a mix of driver behaviour and additional vulnerable child pedestrians. This is discussed in detail in the report.</p> <p>Parking on site is consistent with LLP 206, however this will not prevent patrons parking on the street if it is the easier option, likely impacting on the current residential amenity.</p> <p>Mayfair Street has not been considered within the TIS and the development may impact on traffic queues on this street, possibly resulting in drivers taking unnecessary risks, which is of concern considering the number of children</p>

<p>safely. Such a development on Butler Ave will significantly enhance these issues.</p> <p>4. A round-about positioned on the Narla/Alfred intersection would alleviate these issues somewhat. This road-about should be considered regardless of whether the Childcare facility is approved. It would also assist in slowing vehicle speeds travelling east down the Alfred hill.</p> <p>5. Furthermore, in the afternoon, this section of road is highly dangerous when driving west due to the visual impairment created by the sun setting. I am always concerned about being rear-ended when I turn into my home on Mayfair street. Having additional cars entering and exiting Alfred road from the Child Care facility during this time significantly increases this hazard.</p>	<p>pedestrians in the locality. This intersection is wholly contained within the City of Nedlands and would require their input on any road modifications.</p> <p>A round-about assists with consistency of traffic flows and is not advantageous to pedestrians. This is not considered to be a benefit in this situation.</p> <p>It is considered that safety issues within the existing road network may be exacerbated by the proposed development due to increased queues resulting in drivers taking risks.</p>
<p>4. 8 Narla Road, Claremont</p> <p>I do not understand why the Council would consider allowing a large business in a residential area. If it was an application to run a dress who of course you would say no, but it seems to be OK to run a large business with about 10 times the traffic volume of a small dress shop. The term 'children' conjures images of sweet and nice but we are talking about hundreds of cars going in and out of a centre. People do not just drop babies/children at the sidewalk. They park, take them in and settle them until the baby/child is OK. I fully support small day care centres in suburban areas but these need to have a maximum of 20 to 25 children. Even those numbers will have an impact on the busy Alfred Road and increase traffic in what is an unsafe area anyway.</p> <p>Children will die if you put a large centre on a busy street and the council will be partly responsible for not obeying its own policies.</p> <p>Please reject the application to put a big business in a residential area.</p>	<p>Noted. Child Care Centre is an 'SA' land use and is considered inappropriate at this scale in this location, see comments above.</p> <p>Traffic congestion and safety are a concern, and may adversely impact amenity of the residential area, see above.</p> <p>Recent serious accidents involving school children has not been taken into account in the TIS.</p> <p>The scale of the development is considered likely to have an adverse impact on the current residential amenity.</p>
<p>5. 22 Strickland Street, Mt Claremont</p> <p>I am writing to object to the proposal for a Commercial Childcare Development on the site at 162 & 164 Alfred Road Swanbourne. I have viewed the revised plans and strongly object to the proposal.</p>	<p>Noted.</p>

<p>This location is zoned R20 which is a residential Zoning. When any person buys or owns property in this zoning, they are entitled to expect the area will be residential until there are zoning changes or changes to Town Planning Schemes. This area is purely residential.</p> <p>Additionally during peak traffic conditions including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility with 12 staff and 65 children will not only significantly increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school.</p> <p>We are owner/occupiers on Strickland Street and have children attending Swanbourne Primary School and are very concerned as the additional traffic will increase risks to our children when riding to school. The traffic report in the submission did not include the neighbouring intersection 65m away (Alfred/Rochdale) where 2 Swanbourne Primary Children have been hit by cars riding to school this year alone. One of these incidents was extremely serious and the second (from what I am aware) is an ongoing hit and run investigation. This intersection has traffic lights and pedestrian crossing to increase safety and these incidents have still occurred. The Butler intersection is without the safety of lights with pedestrian crossing. The proposed childcare facility with a significant increase in traffic for the intersection will therefore be increasing the risk to children travelling to and from Swanbourne Primary and as a result I lodge my objection to these plans.</p>	<p>Child Care Centre is an 'SA' land use and is considered inappropriate at this scale in this location, see comments above.</p> <p>Traffic congestion and safety are a concern, and may adversely impact amenity of the residential area, see above.</p> <p>Two accidents have occurred recently involving school children, see above. It is considered traffic and safety concerns have not adequately been addressed.</p>
<p>6. No address given</p> <p>I am writing to object to the proposal for a Commercial Childcare Development on the site at 162 & 164 Alfred Road Swanbourne. I have viewed the revised plans and strongly object to the proposal.</p> <p>This location is zoned R20 which is a residential Zoning. When any person buys or owns property in this zoning, they are entitled to expect the area will be residential until there are zoning changes or changes to Town Planning Schemes. This area is purely residential.</p> <p>Additionally during peak traffic conditions including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility with 12 staff and 65 children will not only</p>	<p>Noted, See above.</p> <p>See above.</p>

<p>significantly increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school.</p> <p>We are owner/occupiers on Strickland Street and have children attending Swanbourne Primary School and are very concerned as the additional traffic will increase risks to our children when riding to school.</p> <p>The traffic report in the submission did not include the neighbouring intersection 65m away (Alfred/Rochdale) where 2 Swanbourne Primary Children have been hit by cars riding to school this year alone. One of these incidents was extremely serious and the second (from what I am aware) is an ongoing hit and run investigation. This intersection has traffic lights and pedestrian crossing to increase safety and these incidents have still occurred. The Butler intersection is without the safety of lights with pedestrian crossing.</p> <p>The proposed childcare facility with a significant increase in traffic for the intersection will therefore be increasing the risk to children travelling to and from Swanbourne Primary and as a result I lodge my objection to these plans.</p>	<p>See above.</p> <p>See above.</p> <p>See above.</p>
<p>7. Fern Street, Swanbourne</p> <p>Thankyou for providing the link to the modified plans and the revised traffic report resulting from mediation at SAT. I remain concerned about the traffic impact on the corner of Narla Road and Alfred Road. It is disappointing the mediation process required an assessment on the impact of the Rochdale Road / Alfred Road intersection but not the Narla Road intersection. The Rochdale Road intersection is controlled by traffic lights and I agree that the traffic generated by the Child care centre is unlikely to impact on this intersection.</p> <p>I am unable to comment on the Bulter Avenue / Alfred Road intersection because I never make turns in or out of this street. However, the Narla Road intersection during morning peak and afternoon peak (starting at just after 3.00pm) is very difficult. During these times, to make a right hand turn out of Narla Road into Alfred (travelling towards the City) it is necessary to rely on the gaps in traffic created by the traffic lights at Rochdale or West Coast Highway. It is often not possible because the gap created by lights at Rochdale coincides with a flow of traffic from the lights at West Coast and visa versa. Similarly, a car traveling from West Coast Highway may queue in</p>	<p>Noted. The TIS has only considered limited intersections and has not referred to the Narla Road or Mayfair Street intersections.</p> <p>This intersection has not been assessed in the TIS therefore queuing delays and restrictions cannot be confirmed at this point.</p>

<p>the turning right lane to wait for a gap in traffic from the Rochdale lights to turn into Narla; thus preventing a turn right movement from Narla into Alfred.</p> <p>There is no round-about and there are no traffic lights to assist the turn right movements out of Narla. Because of the local geography (lake Claremont) there only three intersections I can use heading north/ north-east/ east from Fern Street or the Scotch College vicinity: Alfred / West Coast; Alfred / Narla; and Alfred / Davies. Because of the geography and the location of Schools, an unusually large amount of traffic (unusual for a 50km small suburban street) uses Narla Road to turn right into Alfred including buses. As traffic has been increasing the gaps/ shadows created by the traffic lights at Rochdale and Alfred are getting less frequent and smaller especially in the peak hours.</p> <p>The impact of the child care centre will be that cars travelling west from the Childcare centre during peak periods will get first use of the gaps in traffic created by the Rochdale lights. This will reduce even further the opportunities to turn right out of Narla. Inevitably the Council will have to carry the cost of managing this intersection (a possible round-about (challenging because of the gradients?)).</p> <p>At this stage, extra traffic from the Childcare Centre will have a negative impact on amenity and possibly safety. It will add a source of peak hour traffic to an intersection which is already overloaded at peak hours. The loss of amenity is unnecessary. The child care centre is poorly located (reference state and local planning policies). It is an opportunistic proposal based on obtaining relatively cheap land. The developer's benefits from opportunity should not over ride the adverse impact on amenity. Of greater concern is the likelihood of accidents at the intersection of Narla. I have noticed an increase in risky decision making by drivers (frustrated at the amount of time in the queue at Narla Road) they turn into gaps which are not quite big enough, causing cars travelling along Alfred to brake. Please do not ignore this intersection. It is disappointing and surprising it has not been part of the mediated outcome.</p>	<p>A round-about is not being considered as it could exacerbate unsafe conditions for traffic breaks and pedestrians, see above.</p> <p>Noted, the TIS has not analysed the Narla Road intersection, a round-a-bout is not appropriate, see above.</p> <p>The proposal is not locationally consistent with LPP 206 and PB 72/2009. It is considered that additional traffic will exacerbate safety issues and adversely impact on the amenity of the residential neighbourhood. If the application is approved road modifications are considered appropriate to facilitate traffic movements and improve safety conditions.</p>
<p>8. 6 Butler Avenue, Swanbourne</p> <p>I write to you as a concerned nearby resident who will be impacted by a proposed childcare centre at 162 & 164 Alfred Road Swanbourne, should the proponent's development application be ultimately approved. As you may be aware, the application was rejected by the Town of Claremont earlier this</p>	<p>Noted.</p>

<p>year, and then subsequently by the State Panel. The developer has now submitted a revised application and has appealed to the Tribunal.</p> <p>I believe that the proposed facility, catering for 65 children, is in an inappropriate location with respect to the amenity of neighboring residents, especially those living in Butler Avenue Swanbourne. Butler Avenue, which is a relatively short length cul-de-sac, would provide the primary access for the centre.</p> <p>The revised application and design have not alleviated the fundamental concerns that I have with regard to the increased traffic burden that will be imposed by a facility of this scale. The location of the centre on the corner of Alfred Road and Butler Avenue, is in my view, entirely impractical. This is on the basis of the already substantial volumes of traffic passing through the intersection during week day peak periods.</p> <p>Traffic and parking congestion difficulties will very likely arise in Butler Avenue during these peak periods when customers are dropping off and collecting children. Furthermore, I believe that there will exist a traffic safety hazard at the Alfred Road and Butler Avenue intersection should this development proceed and achieve its commercial target of 65 children under care. The intersection, which is close to traffic lights on Rochdale Road, is already hazardous for motorists entering and leaving Butler Avenue. I don't believe that the applicant has adequately and impartially assessed the added traffic volumes and the consequential impact.</p> <p>I am not averse to redevelopment of the site, currently occupied by two houses, but would prefer to see a development that is thoroughly planned and not just an overt commercial enterprise within a residential area.</p> <p>Thank you very much for receiving this correspondence, and I do hope that you may be able to see the proponent's application for what it really is, ie a hazardous and ill-conceived development in the wrong location.</p>	<p>It is considered the location is not appropriate and may adversely impact on the amenity of the locality. See above.</p> <p>The scale of the modified development is still too large to be considered appropriate as it may impact on the current residential amenity. See above.</p> <p>See above.</p> <p>It is considered residential development would be more appropriate for the site, consistent with the current residential amenity.</p> <p>Traffic and safety are of concern, with subsequent impact on current residential amenity see above.</p>
<p>9. 59 Mayfair Street, Mt Claremont</p> <p>I am a resident of Mt Claremont living just up the road from the proposed childcare centre. I am writing to express my concern about this Proposed Child Care Centre and it's revised application for 162&164 Alfred Road Swanbourne. This application is for a large scale, commercial childcare</p>	<p>Noted. See above.</p>

<p>centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p> <p>Excessive traffic in the area during school drop off time. It is very difficult turning right from Mayfair street now. The child care centre would make this problem worse.</p> <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	<p>Mayfair Street has not been analysed in the traffic modelling and level of service may drop, which could cause drivers to take additional risks. It is considered the TIS does not adequately consider the site specific issues, See above.</p>
<p>10. Mayfair Street, Mt Claremont</p> <p>I am a resident on Mayfair Street in Mt Claremont and a frequent user of Alfred Road.</p> <p>I have concerns about the new application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre. I strongly oppose to this development on the basis of safety of pedestrians and particularly the young community around the area, the increase in thoroughfare will have a massive impact on Butler Street, Alfred Road and Mayfair Street. The safety for all involved should be of concern.</p> <p>I don't feel the new application has changed to be honest other than the amount of children and staff. I ask that the Council strongly reject this application.</p>	<p>Noted, see above.</p>
<p>11. 163 Alfred Road, Mt Claremont</p> <p>As an a owner of an immediately affected property in Mt Claremont, we write to you to express our concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre. This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p>	<p>Noted, see above.</p>

<p>We oppose the development based on the following concerns:</p> <ul style="list-style-type: none"> • Already adequate Childcare facilities nearby. What is the case study for this site. • Existing residential R20 zoning and longstanding suburban setting seems to be completely at odds with commercial premises which has been initiated with no consultation with the council. • Operating Hours of Centre in suburban setting noting we have not yet viewed the draft Council policy on neighbourhood child care centres and specific Licensing conditions proposed for the centre. • Grave concerns on alternative allowable uses if Child Care Centre fails. Grave concerns on alternative uses allowable or unauthorised uses after child care operating hours- other user groups or renting for other uses, ie band practice, exercise, hobby interest groups, family relationship or intervention/counselling groups. • Likely hood of facility being developed and sold. Protections that bind new owners to conditions. • Light pollution dusk to dawn if security lights burn during the night. <p>Noise pollution:</p> <ul style="list-style-type: none"> • Potential for early start & late finish of centre and associated noise from staff and young children. • Parent meetings, Parties etc after operating hours. • Children at play. • PA music or other amplified annunciations. • Plant and equipment attenuation and visual consideration. Ie not on roof tops. 	<p>No empirical evidence has been provided by the applicant to demonstrate need for a Centre on this location.</p> <p>See above.</p> <p>Operating hours are proposed from 7am to 6pm.</p> <p>Any additional or future uses would be subject to DA and assessed on their merits.</p> <p>Any conditions of approval run with the land.</p> <p>Light pollution can be monitored and addressed if required.</p> <p>Noise will be limited to EPA Noise Regulations and conditions are recommended that any approved development comply with the recommendations of the acoustic reports.</p>
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The Traffic Study does not address specific data to the area, and relies on preferential selection of reference data from elsewhere.

I can see no real consideration for the following:

- Butler avenue is no through road. No through traffic. What goes in must come out same way. Traffic jams up that street very likely.
- Traffic Lights & existing Traffic jams.
- Bus stop and the specifics of the proximity to the lights, no pull off bay , already affecting driveways, side street with Traffic jams.
- Swanbourne Primary School & Scotch college traffic.
- Peak hour traffic schools and workers.
- SAS, ARIA apartments traffic
- Population growth affect under City of Nedlands Scheme 3 Infill adding density- projections to be considered in traffic study.
- Potential for Inappropriate use of Kennedia lane to bypass traffic lights. More users.
- Median strip or turning bay.
- Vehicle, light & Heavy, Bicycle,
- Movement across Alfred road by Pedestrians, in front or behind buses or banked traffic. Already bad related to school.
- Banked traffic blocking driveways of 159, 161 and 163 Alfred road,

The proposed building looks lightweight and out of place in the setting specifically:

It is considered the TIS does not adequately consider the site specific issues, see above.

Whilst the modified plans are more in keeping with residential character of the locality, the building is larger than required to accommodate 65 children, adding unnecessary bulk and adversely impacting on residential amenity, see above. Play areas are also constrained by the building and the large

<ul style="list-style-type: none"> • The external form looks as if it is a multi-retail/commercial development. With not much adjustment to the internal layout it looks as if the development could be easily repurposed as 4 or 5 commercial units. • Unusual attributes added to the design such as roller shutters and service gates that really look like provisions for an intended alternate use. • The long continuous external walls is very commercial, and I question its suitability for enhancing the street scape. • The play areas look narrow, and surround the building, with no real indication of play equipment, sand pits etc. • No adequate consideration for plant equipment such as external Air conditioning condensing units to be housed on plantrooms or acoustic enclosures. Locating this sort of equipment must surely but secured away from play areas, adjacent boundaries, and not be permissible on roof tops in the visual field as so often is done on low cost commercial developments. • No added mature plantings have been shown, or anything to further conceal the intended commercial nature of the site. • There is no notes relating to intended enhancements to streetscape. I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response. 	<p>area of car parking hardstand, with one located adjacent to the eastern residential boundary, which contributes to the impact on residential amenity.</p>
<p>12. 10 Butler Avenue, Swanbourne</p> <p>As owners of property in Butler Ave Swanbourne we oppose the amended plans for a child care centre at 162/164 Alfred Road Swanbourne. The amended plans still do not address the issues of traffic and noise. The complicated traffic modelling does not address the issue of traffic entering the centre from the cul de sac of Butler Ave. It must be challenged for its accuracy. We oppose the large scale development in a residential area. Please find below our concerns from the original plans, as they still are relevant as the amended plans go no way to reducing any issues these points raise.</p>	<p>Noted, see above.</p>

<p>Large scale commercial development for 103 people is not appropriate for a residential area. The development will exacerbate the traffic congestion in this area of Alfred Road and it will be unsafe. Butler Ave has an extreme incline on it and is not very safe near the top end with decreased visibility for drivers. The plans to allow the entrance on Butler Avenue would be unsafe.</p> <p>The plans do not align with the WAPC Planning Bulletin 72/2009. In particular</p> <ul style="list-style-type: none"> • Needs to be considered suitable from a traffic/safety point of view – it is not, due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Ave has limited visibility. • Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street. (All three of these are violated). The planned child care facility is close to a major intersection (Rochdale & Alfred) and an intersection that is already under pressure (Butler Ave & Alfred Road) • Parking access should be located at the front of the building (it is not – plans indicate it is on the side). • No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or Short Access Road, such as a cul-de-sac or no through roads (Butler Ave is a cul-de-sac). • In peak hour, getting out of Butler Ave onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 322 cars per day (161 in/161 out) will have a significant impact on the surrounding neighbourhood (300% increase in traffic) and amenities. • Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side. • Travelling westbound between Rochdale & Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated. 	<p>Noted. It is considered Butler Avenue is not appropriate for this scale of development due to its short length and topography, exacerbating safety issues.</p> <p>It is considered the proposal is not locationally appropriate, see above.</p> <p>Parking is at the front and side.</p> <p>Noted, locationally inappropriate see above.</p>
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| <ul style="list-style-type: none">• Given the limited parking, it is likely visitors to the childcare facility will also park in Mayfair Street on the north side of Alfred Road. Trying to cross Alfred Road with young children is dangerous in peak hour.• In the last year, there have been 2 accidents on the Butler Avenue and Alfred Road intersection.• In the morning, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.• If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily be visible to vehicles coming from the south end of Butler Ave due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from south to north along Butler Ave.• The intersection directly west – Narla Road and Alfred Road, is extremely busy and is in close proximity. Narla/ Devon Roads are popular access roads to Claremont Centre rather than going via 2 main roads (West Coast Highway & Davies Road). This will put more pressure and traffic on these local roads.• A large commercial childcare centre like this would increase the traffic congestion on Rochdale and Alfred. Butler Ave would be extremely busy as people would need to go to the bottom of the street to turn around due to the incline. This impact the amenities for the residents.• Many people with dogs access Lake Claremont via Butler Ave and for most of the avenue there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.• The traffic reports done by the developers' consultant states that there have been no accidents which is inaccurate. In the last year alone, there have been at least 2 accidents which were not reported to police. One involved a bike and a car (due to incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred Road. | |
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<ul style="list-style-type: none"> • There are more appropriate sites along Stirling Highway or near other commercial or educational hubs for this type of development. • There have been too many childcare centres in Claremont and Nedlands with over supply and limited demand. Proof of this is that 2 shut down in recent times due to low numbers. These were: Mulberry Tree Child Care located at My Claremont Primary School Alfred Road. Little Buckets at 175 Stirling Highway, Nedlands. 	
<p>13. 7 Milyarm Rise, Swanbourne I would like to add my objection to the childcare facility at 162-164 Alfred Road. It beggars belief that this would be allowed in this location. The Town of Claremont has said no to the development, as has The State Panel. Surely that is evidence enough to stop this. Hopefully you will be able to apply some much needed sanity to this situation.</p>	<p>Noted, see above.</p>
<p>14. 150A Alfred Road, Swanbourne I would like to object to the development on the grounds of road safety. My son uses the bus stop between Butler Ave and Narla road on a daily basis to get home from school and I am concerned about the impact the development will have on him being able to safely continue to cross Butler road on the way home and Alfred road at the traffic light intersection when this is considered with the new road rule that motorbikes can pass through stationary traffic. With traffic queueing motorbikes weaving between stationary vehicles becomes highly probable and will thus make crossing roads in the area far more dangerous especially as there are merge point on Alfred road and no central crossing safety zones for pedestrians. We all know parents are busy and you only have to view the kiss and go zones at any of the local schools to see on a daily basis the inconsideration of parents, I'm sure that they don't set out to be so inconsiderate or uncaring but extreme work and life pressure make for poor choices combined with inattention and this coupled with phone use and music by pedestrians (my son is a teenage over 6ft tall and I'm still concerned) lead to a dangerous combination and the potential loss of a talented and gifted child and the social impact on the local community. If common sense is ignored and greed is allowed to succeed. We have all heard the story this month of corruption accused public servants Paul Whyte and the impact of lack of strong governance on greed.</p>	<p>Noted, delays in traffic and queuing can cause drivers to take risks which may exacerbate safety issues involving young (inexperienced) child pedestrians, see above.</p>

<p>I would also like to point out that the area in question has a wide mix of residents and the impact on the elderly will be just as significant as the bus stop provides a vital lifeline into Claremont for some of the local residents who can no longer drive.</p>	<p>It is considered that the proposal is likely to have an adverse effect on residential amenity.</p>
<p>15. Strickland Street, Swanbourne</p> <p>I am writing to object to the proposal for a Commercial Childcare Development on the site at 162 & 164 Alfred Road Swanbourne. I have viewed the revised plans and strongly object to the proposal.</p> <p>This location is zoned R20 which is a residential Zoning. When any person buys or owns property in this zoning, they are entitled to expect the area will be residential until there are zoning changes or changes to Town Planning Schemes. This area is purely residential.</p> <p>Additionally during peak traffic conditions including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility with 12 staff and 65 children will not only significantly increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school.</p> <p>We are owner/occupiers on Strickland Street and have children attending Swanbourne Primary School and are very concerned as the additional traffic will increase risks to our children when riding to school.</p> <p>The traffic report in the submission did not include the neighbouring intersection 65m away (Alfred/Rochdale) where 2 Swanbourne Primary Children have been hit by cars riding to school this year alone. One of these incidents was extremely serious and the second (from what I am aware) is an ongoing hit and run investigation. This intersection has traffic lights and pedestrian crossing to increase safety and these incidents have still occurred. The Butler intersection is without the safety of lights with pedestrian crossing.</p> <p>The proposed childcare facility with a significant increase in traffic for the intersection will therefore be increasing the risk to children travelling to and from Swanbourne Primary and as a result I lodge my objection to these plans.</p>	<p>Noted, see above.</p>

16. 45 Mayfair Street, Mt Claremont

I am a resident of Mt Claremont and my children attend Swanbourne Primary school which is the local Primary school to which the children of many Mount Claremont residents are zoned. We must enter and exit our street from Alfred Road as this end of Mayfair Street is a cul-de-sac. We are therefore frequent users of Alfred Road and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

- The proposed Centre's proximity to the intersection at Rochdale Road. This is a major intersection which is already very dangerous.
- The banking up of traffic during peak hour (7.30am – 9am and 3pm – 6pm) which already occurs in the area, not to mention how difficult it would be with the added extras of day care patrons during peak hour.
- Safety and traffic impact. Every morning my family use Alfred Road in one of three ways...

1. My 13-year-old daughter crosses Alfred Road by foot to catch the school bus from the bus stop on the south side of Alfred Road between Butler Avenue and Narla Road. While as a parent, I would prefer my daughter walk east to the Rochdale Road lights in order to cross Alfred Road, human nature and reality means she does not do this and instead runs the gauntlet and often waits 2-3 minutes to cross Alfred Road from North to South. I worry for her safety every morning as the hundreds of cars which travel west to east in the morning down this stretch are either moving very quickly due to the pace picked up coming down the hill from the west, or are banked up from the Rochdale Road lights all the way back west to Narla Road due to the hold up at the Rochdale Road lights. I am extremely worried about the chaos which will occur with even more traffic stopping and starting and turning at this intersection with the addition of a large-scale childcare centre in this immediate location.

Noted, see above.

2. My two younger boys ride their bikes to Swanbourne Primary school most mornings. I insist they cross Alfred Road at the Rochdale Road lights, which they do. This means they are then riding along Alfred Road from east to west and always cross Butler Avenue as they head west along Alfred Road towards Narla Road to head towards Swanbourne Primary school. These are two young boys who also ride with friends who also live in Mount Claremont and attend Swanbourne Primary school to which they are all zoned. I worry for them every day.

3. One or two mornings each week, I drive my children to Swanbourne Primary school, and I am always held up, often for 3-4 minutes, at the bottom of Mayfair Street where it meets Alfred Road. I must turn right from Mayfair onto Alfred Road in order to go to Swanbourne Primary. This right hand turn is so busy, I make a note to turn off the radio and tell my children to be quiet so I can concentrate to find a gap in the traffic. I must frequently power my vehicle to its full power in order to turn out and "find a gap" to enter Alfred Road. The addition of a childcare centre at this intersection will turn this section of the road into absolute chaos and I feel it would only be a matter of time before another serious accident or death occurs in this location.

- I personally know two of the local children who have been hit by cars on Alfred Road around the Rochdale Road traffic lights in the past three months.

I am so worried my children will be the next ones hit.

- The rising and setting sun has always been a problem along Alfred Road and has caused many crashes and accidents over the years. The sun is a problem heading east in the morning and west in the afternoon. Cars turning right from Alfred Road into Butler Avenue in the morning to drop off children, will be holding up the traffic flow towards the East. If a Childcare Centre is approved here there will be rear-ending in this location in the mornings as drivers struggle to see other cars stopping to turn right into Butler Avenue at this point.

0 The majority of cars travelling along Alfred Road in the morning peak hour, are travelling towards the East to head into the CBD to work, and into the rising sun. The majority morning eastbound traffic does not appear to be acknowledged in the traffic report submitted with the revised Childcare

<p>Centre plan. Of course the prevailing traffic direction in the afternoon is westbound, and again into the setting sun. This adds further danger to the already dangerous intersection of Butler Avenue and Alfred Road and Mayfair Street.</p> <p>- The location of this proposed Childcare Centre is in a purely residential area zoned R20 Residential. Home owners in this area are entitled to expect this area would be purely residential. It may be understandable to develop a childcare centre close to other commercial hubs like high street shops, a train station, or other built-up areas, but this location is completely surrounded by residential homes. The size and scale of the proposed centre is completely out of proportion with the surrounding properties.</p> <p>- The proposed parking for staff is insufficient. The bus service to Alfred Road is not frequent. The #27 bus services the CBD but does not travel frequently, which means it is unlikely staff will realistically use the bus to travel to and from work, and will instead drive cars and will then park on streets like Mayfair Street and Butler Avenue, which are local streets not designed to hold multiple cars parking on them. This behaviour will cause even more chaos and visibility difficulties at this intersection.</p> <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	
<p>17. 8 Narla Road, Swanbourne</p> <p>I am a resident of Swanbourne and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p> <p>This proposal is for a big business in a residential area. If I asked to put a shop on this block of land with 1/3 of the cars of this proposal, you would not allow it but for some reason there is an idea that a child care centre is good</p>	<p>Noted, see above.</p>

<p>for local people. Small centres (around 20 places) are fine but we are talking about a big business with over a hundred cars visiting per day.</p> <p>Alfred Road is already busy. It is hard to get from my home from Narla Road onto Alfred each day. Yet you are hoping to increase the amount of traffic on what is a busy road. How long before a child is killed.</p> <p>The suburb has no through roads. People will have to drive down Butler, turn around then go back to Alfred Road turning either right or left into the traffic. It will be a disaster. What was a quiet street is now going to be used by over 100 people every day. Their amenity will be ruined.</p> <p>Parents dropping children at day care centres do not just drop them. They park and carry or walk their children in and stay for a while if the child is unsettled. If you have 50 parents arriving around 8 am where will they park? I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	
<p>18. 64 Mayfair Street, Mt Claremont</p> <p>The ridiculous proposal to build a childcare facility for 65 children and 12 staff at 162-164 Alfred Rd breaks every rule in the WA Planning Commission's book and pays no attention to its hazardous location.</p> <ol style="list-style-type: none"> 1. The site is 100m west of and close to the very busy Rochdale/Alfred Rd intersection, especially in the morning and evening peak traffic. I know because I cross Alfred Rd/Butler Avenue intersection daily with my dog. 2. The site is on the Butler/Alfred intersection so directly affects the amenity of ALL Butler, Alfred and Mayfair Street residences. 3. The site is NOWHERE NEAR a commercial, recreation, community or education centre. In fact it is plonked into a fully occupied residential area trying to shield itself from excessive traffic and developments. <p>Swanbourne School is two blocks away. Perhaps the childcare centre could have been incorporated in the Aria Apartments Complex which took land from the school in the first place. Alternatively, the facility might be better sited near the Mount Claremont Community Centre, where a small day care centre</p>	<p>Noted, see above.</p>

<p>already operates. Perth must adhere to strict guidelines for development to preserve its standard of living or fall into the trap of developmental mayhem.</p> <p>Ask any Butler Street (or Mayfair Street which is opposite) resident how dangerous and tricky it is to exit their street into Alfred Rd on the opposite side. Kennedia Lane (parallel to Alfred Rd) is now a preferred exit for Mayfair St residents to quickly access Rochdale Rd and avoid the Alfred Rd chaos. Adding another 60-80 vehicles twice a day at the same time will be disastrous. Check the Swanbourne Primary School scenario!</p> <p>In this case I hope the Towns of Claremont / Nedlands and WA Planning Commission pay attention to local residents' objections.</p>	
<p>19. 55B Mayfair Street, Mt Claremont Traffic: Residents in Butler, Mayfair, Rochdale, Myera, Strickland and Narla all find turning into Alfred Road within that 300 metre stretch that includes the set of lights at Rochdale Road extremely difficult to turn out of these streets in the normal course of their daily commute especially turning right. Adding another 40 or fifty traffic movements each way in peak periods is going to make it worse.</p> <p>Also, during the warmer months travelling west along Alfred Road in the afternoon around 5.00 p.m. the sun is directly ahead. Cars accelerating from the Rochdale Road lights in a westward direction will be suddenly confronted by cars slowing down to enter the childminding facility. Accidents are occurring in that stretch of the road already and this will potentially increase the risk of further accidents.</p> <p>Location: Siting of a commercial enterprise in an almost totally residential precinct with its associated noise and traffic movements seems to be at odds with the amenity that we enjoy currently on both sides of Alfred Road.</p> <p>We hereby advise that we formally object to the proposed child-minding facility at 162-164 Alfred Road.</p>	<p>Noted, see above.</p>
<p>20. 3 Butler Avenue, Swanbourne We are residents of Butler Ave. and have been very happy in our quiet residential area. We are horrified at the prospect of a Large Commercial</p>	<p>Noted, see above.</p>

<p>Child Care Centre being allowed to go ahead 162-164 Alfred Rd. (Cnr. Butler Ave.)</p> <p>The Traffic situation is very dangerous, without added vehicles.</p> <p>Revised Plans show added access via 162 Alfred Rd. just past Traffic, where traffic merges, this already creates dangerous problems. Accident rate is low, due to local knowledge and special care taken by local drivers. The Crossover in Butler Ave. will create many dangerous events & interfere with residents access to our properties. There already enough Child Care Centres in this area</p> <p>Another prospective problem is the Rubbish Disposal, which they say will only be done by small vans, Can this be policed?</p> <p>There is only one small section of footpath on the West side of Butler Ave. This means, children (from cars parked in Butler Ave.) will have to be walked along the road and create another traffic problem.</p> <p>Please count this as 2 separate objections</p>	<p>A change in road may increase the risk of accidents in due to driver behaviour.</p> <p>Service vehicle will be monitored should the development proceed.</p> <p>Road modifications are recommended should the development proceed.</p>
<p>21. 4 Nidjalla Loop, Swanbourne</p> <p>I live in the area and am opposed to any such commercial development in a residential area.</p> <p>I use travel road every day and it is already dangerously overcrowded during morning and afternoon peak traffic times. The addition of a childcare centre will only exacerbate traffic issues since its main drop-off and pickup times will coincide with schools and peak hour traffic.</p> <p>The development has already been deemed unsuitable by the town of Claremont and the state panel and received a high number of objections from residents. This should be sufficient to stop the project. If not then I am adding my objection to this proposal.</p>	<p>Noted, see above.</p> <p>The high number of objections to the proposal quantifies the likely impact on current residential amenity.</p>
<p>22. Mayfair Street, Mt Claremont</p> <p>As a concerned citizen living in Mayfair St and a professional health and safety manager, working with high hazards and risk management every day, I am astounded that the concept for a commercial development with multiple</p>	<p>Noted, the TIS has not adequately addressed site specific issues, also in respect to safety, see above.</p>

<p>car entries and exits at peak times is even being considered for Alfred Rd. This concept is close to traffic lights, on a blind corner and across from Mayfair st. Traffic congestion at Mayfair / Butler is already pervasive at peak times in the morning and in the afternoon and I would envision that the majority of cars will be turning across traffic to enter and exit the facility. Buses and school traffic - children at risk crossing the road compete with cars trying to enter Alfred road are already affecting the safe traffic movement through this area to a substantial degree. I have serious questions about the traffic management in and around the facility given it's ability to generate the majority of its traffic while the road system is already under stress.</p>	
<p>23. 8 Nidjalla Loop, Swanbourne</p> <p>I wish to lodge an objection on behalf of myself and my family who reside at 8 Nidjalla Loop, Swanbourne. The proposed development constitutes a major traffic safety issue apart from the disruptive and negative impact it will have on the local community during construction and subsequently. Having endured the chaos, destructive nature of the construction works and traffic risks created by the Aria Apartment Development in Milyarn Rise, I am able to speak from bitter experience that the community objections, complaints and fears are more than justified.</p> <p>Please do not underestimate the negative impact that this development will have on the local amenities.</p>	<p>Noted, it is considered the development will have a negative impact on residential amenity, see above. Should the JDAP approve the application a condition is recommended that a Construction and Site Management Plan detailing access to the site, the delivery and storage of materials and the parking of tradespersons is to be submitted and implemented for the duration of construction.</p>
<p>24. 15 Butler Avenue, Swanbourne</p> <p>I am a resident of Butler Avenue Swanbourne and a frequent user of Alfred Road and I am writing to express my extreme concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>My other concerns are with safety issues surrounding increased traffic in an already congested merged traffic landscape and the parking issues we will experience is a quiet residential cul-de-sac. Neither the Butler Ave nor the general precinct are designed to cope with this commercial activity.</p>	<p>Noted, see above.</p>

<p>Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.</p> <p>The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred Rd</p> <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	
<p>25. 164 Alfred Road, Swanbourne</p> <p>I wish to advise the Town, as the landowner of Lot 18 (No. 164) Alfred Road, Swanbourne, I have reviewed the new plans and support this proposal.</p> <p>I am of the view the proposed built form reflects the residential character of the surrounding residential area and the proposed use will not cause any impacts on the amenity of the area from a built form, traffic or noise perspective.</p>	<p>Noted. Whilst the modified proposal is of residential style architecture the location is considered inappropriate and likely to have an adverse impact on the amenity of the neighbourhood.</p>
<p>26. 61 Strickland Street, Mt Claremont</p> <p>I am a resident of Mt Claremont, and I am writing to express my support for the recent application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>The reasons for my acceptance are as follows:</p> <ul style="list-style-type: none"> • It will provide a needed service to the community • It will not have an impact on traffic or noise <p>I ask that the Council strongly ACCEPT this application. I look forward to your response.</p>	<p>Noted, see above.</p> <p>No evidence has been submitted to demonstrate the need for a Child Care Centre in this location.</p>
<p>27. 162 Alfred Road, Swanbourne</p>	

<p>I wish to advise the Town, as the landowner of Lot 19 (No. 162) Alfred Road, Swanbourne, I have reviewed the new plans and support this proposal.</p> <p>I am of the view the proposed built form reflects the residential character of the surrounding residential area and the proposed use will not cause any impacts on the amenity of the area from a built form, traffic or noise perspective.</p>	<p>Noted, see above.</p>
<p>28. 169 Alfred Road, Mt Claremont</p> <p>We are residents of Mt Claremont located on Alfred Road diagonally opposite the subject site and we wish to express our concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area and totally at odds with the current land uses in the area. The whole thrust of development along Alfred Road over the past 20 years has been encouraging of higher density residential from Stubbs Terrace to West Coast Highway – this proposed development is totally incongruous with that development preference and direction.</p> <p>We strongly object to this development on the grounds of deteriorating safety, increased traffic and negative impact on residential amenity particularly for the residents of Butler Avenue, Mayfair Street and Alfred Road who will be the most significantly affected by street parking – the onsite parks proposed will not be enough and the resultant increased pedestrian movements (particularly across Alfred Road) will be hazardous and dangerous.</p> <p>The reasons for our objections are as follows:</p> <ol style="list-style-type: none"> 1. The increased traffic as a result of the development will only exacerbate the already dangerous traffic flows on Alfred Road. 2. The pedestrian flows (and cyclists) along and across Alfred Road – to and from schools and bus stops has not been adequately addressed and the dismissive approach to the impact of the increased traffic by the developers consultants is not reasonable – nor is it objective. 	<p>Noted, see above.</p>

<p>3. Because of the current flows along Alfred Road an increase is going to make peak times even more dangerous particularly turning out of Butler – as we believe earlier video evidence has shown that this is already the case.</p> <p>4. As residents of 169 Alfred Road for over 20 years we have been alarmed at the build-up of traffic and the difficulty of traversing and entering Alfred Road particularly at Peak periods – which is when most of the traffic flow will emanate from 162-164 Alfred Road.</p> <p>We have had instances where we have had to help people across the Alfred Road as they juggle children prams and dogs – and the elderly.</p> <p>5. It is now time for the Councils of Claremont and Nedlands and Main Roads to collectively and properly address the safety issues of this busy road let alone allow further pressure to be placed on an already heavily burdened and dangerous transport route.</p> <p>We implore the Council to strongly reject this application and to provide a compelling case to MWJDAP to also reject this totally inappropriate application and encourage the developers to build something more in keeping with the predominant land use which is residential in nature.</p>	
<p>29. 66 Mayfair Street, Mt Claremont</p> <p>We are still very much against this proposal, as it is not in the interests of our suburban area.</p> <p>Also the traffic problem would still be a huge consideration to contend with. We strongly support the Council's decision to not allow this venture to go ahead under any circumstances. Alfred Road is already a very busy venue, with a dip in the road near the traffic lights, making for possible accidents which could be of an horrific nature.</p>	<p>Noted, see above.</p>
<p>30. 73 Wood Street, Swanbourne</p> <p>I support the application for the Proposed Child Care Centre.</p> <p>There are limited child care centres in the area making this is a much needed development for the community, many of whom are young families.</p>	<p>Noted, see above, no substantiated evidence has been provided to demonstrate the need for a Child Care Centre at this location.</p>

<p>From my understanding, most those opposing the centre reside on the same street and sadly fail to see the positive effect the centre will have on the area.</p>	
<p>31. 18 Mayfair Street, Mt Claremont</p> <p>I am a resident of Mt Claremont and frequent user of Alfred Road as are my three children. I am writing to express my grave concerns once again about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>My primary concerns regarding the revised plans for a commercial childcare centre located on a very busy road in a residential area is for the safety of children. The fact that the childcare centre's peak operation times will mirror those of young children walking and riding to Swanbourne Primary school, walking to nearby bus stops to get to other schools as well as normal pedestrian use lends itself to a fatal accident waiting to happen.</p> <p>There have already been a number of children hit by cars on this road either side of the development, fortunately none fatal AS YET!</p> <p>However the increased traffic that the centre will bring to Alfred Rd and the surrounding roads if given approval will be far more than can be managed with existing usage now. The traffic at school times both in the morning and the afternoon is already congested, drivers rushing to get their children to and from school, tradesmen and heavy trucks are blocking the road already leading to drivers taking senseless and risky manoeuvres which are witnessed on a daily basis.</p> <p>The other reasons to support it not getting through is the close proximity to Lake Claremont and the impact it will have on wildlife. This is a protected area as are the fauna that dwell within it and excessive cars whether driving or parking down the side streets on the Swanbourne side look at injuring or killing this protected wildlife, especially during breeding season where these creatures tend to wander further afield.</p> <p>I absolutely strongly object to this development on the grounds of safety, traffic and impact on residential amenity and concerns with neighbouring wildlife.</p>	<p>Noted, see above.</p> <p>Should the development proceed there is a potential that additional unaware traffic could endanger wildlife in the area.</p>

<p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>32. Address not provided I am a resident of the area and I support the application for the Proposed Child Care Centre. I have a young family and have noticed that there is a shortage of child care centres in the area. Currently the waiting lists in our area for childcare centres is astronomical. I have enrolled my second child into daycare when I was 5 months pregnant and the place available has just been confirmed until AFTER his first birthday. That is an 18 month wait for a childcare place. This is a much needed development for the community. Many of us cannot afford to have a nanny look after our children when we go back to work and I do not have family living in the country. I do not believe there will be any negative effects of such a development. Therefore, the more childcare centres the better, I vote YES for this development.</p>	<p>Noted, see above, no substantiated evidence has been provided by the applicant.</p>
<p>33. Address not provided I am a resident of the area and I support the application for the Proposed Child Care Centre.</p> <ul style="list-style-type: none"> • I believe the development will be an added benefit to the community • I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community • The sight of young children playing outdoors at childcare centres brings a great deal of joy to myself. I am an resident of the area and I strongly support this development. • I do not believe there will be any negative effects of such a development. • I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves. They are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families 	<p>Noted, see above.</p>

<p>and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development.</p>	
<p>34. Address not provided I am a resident of the area and I support the application for the Proposed Child Care Centre.</p> <ul style="list-style-type: none"> I believe the development will be an added benefit to the community I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community. I do not believe there will be any negative effects of such a development. I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves. They are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development. 	<p>Noted, see above.</p> <p>It is considered likely there may be adverse impacts on the residential amenity of the immediate locality. If a Child Care Centre is demonstrated to be required it would be appropriate to be more suitably located in accordance with LPP 206 and PB 72/2009, in an area which will not impact on the current quiet residential amenity of Butler Avenue.</p>
<p>35. Address not provided I am a resident of the area and I support the application for the Proposed Child Care Centre.</p> <ul style="list-style-type: none"> I believe the development will be an added benefit to the community 	<p>Noted, see above.</p>

<ul style="list-style-type: none"> • I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community. • I do not believe there will be any negative effects of such a development. • I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves. They are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development. 	
<p>36. 1 Nidjalla Loop, Swanbourne I am a resident of Mt Claremont/Swanbourne/Claremont, (or frequent user of Alfred Road) and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne –Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p> <p>As a daily user of Alfred Road, it is inconceivable that adding another 300+ vehicle movement at the Alfred Road and Butler Avenue will not have an effect on traffic in general, unsafe environment for residents (children in particular), additional noise and pollution.</p> <p>Furthermore, the proposed amended development will not comply to the WA Planning Commission guidelines, which among other highlights the following three;</p>	<p>Noted, see above.</p>

<ul style="list-style-type: none"> • Commercial developments cannot be close to major road intersection where there maybe safety concerns • Access from a local street must not impact the amenity or the area • A commercial development (Childcare centre) must not be located in a non-commercial, recreation, community or education area/node. <p>It is in the interest of the local residents, Town of Claremont and everybody using Alfred and Rochdale roads, the proposed commercial facility cannot and should not proceed.</p>	
<p>37. 6A Myera Street, Swanbourne We are residents of 6A Myera Street in Swanbourne. The proposed development for a childcare centre at the above address does not comply with the WA Planning Commission guidelines as regards safety, traffic and residential impact. We emphatically object to this inappropriate proposed commercial development in a residential zone. Our objection fully supports the Stop Dangerous Development in Mt Claremont and Swanbourne group.</p>	<p>Noted, see above.</p>
<p>38. 34 Lisle Street, Mt Claremont Firstly, we strongly oppose this development. Firstly, it is an already busy intersection and somewhat congested with great care needing to be taken at the traffic lights, this as two lanes become one. The road bends and we already have to be very careful at busy times when exiting Lisle Street onto Alfred Road. We think it is a potentially highly, dangerous position for such a facility, especially as it will naturally be for the use of families and their young children. 80 people coming and going each day is far too much to add to this already busy area.</p>	<p>Noted, see above.</p>
<p>39. 8A Butler Avenue, Swanbourne I am writing you as a resident of Swanbourne to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre. This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity. The reasons for my objection are as follows:</p>	<p>Noted, see above.</p>

•I believe, that such a large commercial development is not appropriate in our residential area considering existing traffic problems, which already creates a lot of tension and compromises safety of residents of Butler Ave and Alfred Road. Our community already experiences significant deterioration of traffic congestion and safety issues since 156 apartments were finished and sold out of "Aria Swanbourne Luxury Apartments". This complex is located just 1 min driving from proposed Child Care Centre (2 Milyarm Rise, Swanbourne WA 6010 is just 400m from 162&164 Alfred Road).

•According to the development plan, all cars for 77 people will need to exit via Butler Avenue, which has the only exit off Alfred Road. I believe, this will cause enormous overload of traffic on Butler Ave, especially in peak traffic periods when residents are trying to exit Butler Avenue driving to work and at the same time parents will need an access to Alfred Road after dropping off kids. If you assume the numbers of total cars entering in peak are correct (which appear to be understated at 26, - you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. On top of that, please consider the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem and affect safety of our kids walking or riding to schools.

•Approval of this development on this corner is irresponsible. As a resident of Butler Avenue I had experienced a lot of situations when driving safety was compromised even by large cars parked near the intersection of Butler Ave and Alfred Road. Please note a lot of blind spots and limited visibility as well as local landscape and traffic lights located less than 100m from Butler Avenue. Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

•The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate and will create extra pressure and tension for local community.

•The plans do not align with the WAPC Planning Bulletin 72/2009. No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)

<ul style="list-style-type: none"> • The developer makes an unsubstantiated claim on page 8 that “ As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar”. The community is already well serviced with more childcare centres than are required. None of the local centres are full. <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>40. 47 Griver Street, Cottesloe</p> <p>I am a resident of the area and I am writing to express my support for the application for the proposed Child Care Centre on Alfred Road, Swanbourne.</p> <p>We have a young family and have personally experienced difficulties relating to long wait periods (18 months or longer) for quality child care centres in the area. This is a much needed development to support our growing community.</p>	<p>Noted, see above.</p>
<p>41. 52 Narla Road, Swanbourne</p> <p>I am a resident of Swanbourne and a frequent user of Alfred Road, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne- Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in the middle of a residential area. I strongly object to this development on the grounds of safety, traffic and the impact on residential amenities.</p> <p>The reasons for my objections are listed in Appendix 1 to this letter.</p> <p>I ask that the Council reject the application and provide a compelling case to the MWJDAP.</p> <p>I ask you intervene in this matter. It is obvious that the process introduced by the previous Government now has unintended consequences. The developer has engaged tier one consultants, including Rowe Group as well as Transcore, with the aim of achieving a positive outcome for the developer but not the community.</p> <p>ISSUES IDENTIFIED WITH THE DEVELOPMENT</p>	<p>Noted, see above.</p>

);> Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.

);> The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019) there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.

);> Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.

);> In the new plans, all cars will need to exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.

);> The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons:

- o It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Nedlands - however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east- compounding the traffic nightmare that will be generated.

- o All exiting traffic will need to exit via Butler Avenue (and 70% often wanting to turn right and travel east along Alfred Road)- the revised plans do not address this traffic chaos.

- o Figure 2 and calculations have no credibility as the assumptions are not real.

o Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.

o If you assume their numbers of total cars entering in peak are correct {which appear to be understated at 26 you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 {70% of 26} trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.

)> The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.

)> The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.

)> Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.

)> The plans do not align with the WAPC Planning Bulletin 72/2009. In particular-

)> Needs to be considered suitable from a traffic/safety point of view- it is not due to blind spot for westbound traffic (together with merging 4 intersections in close proximity, Butler Avenue has limited visibility

)> Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and

an intersection that is already under pressure (Butler Avenue and Alfred Road)

)> No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)

)> In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% +increase in traffic)

)> Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

)> Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.

)> Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.

)> In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all - looking to the east.

)> If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue

)> The intersection directly west- Narla Road and Alfred is extremely busy and is in close proximity. Narla I Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.

)> Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.

)> The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other- someone trying to pull out of Butler Ave onto Alfred.

)> There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.

);> Adding to further congestion and safety issues- the developer Transcore report on page 5 states that "waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors." And "In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose." - there is no guarantee from the developer that this will occur and how can the Council effectively police this?

);> The developer makes an unsubstantiated claim on page 8 that " As with similar centres/ an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.

);> The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required - why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

);> The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.

42. 85 Davies Road, Claremont

I believe the development will be an added benefit to the community. As I have a young family and have noticed that there is a shortage of child care centres in the area, I feel this is a much needed development for the area. I do not believe there will be any negative effects of such a development

Noted, see above.

43. 26 Swanway Crescent

I STRONGLY OBJECT to this DANGEROUS proposed development at 162 Alfred Rd Swanbourne. Yes, I live near to the proposed site.

Traffic can be chaotic already at school pickup/drop off times for local school, Swanbourne Primary. The large (and objected to) ARIA development nearby on Alfred Rd has also led to a noticeable increase in local traffic. This has been poorly thought out by the developers; there is likely to be accidents/fatalities as a result.

Rochdale and Alfred road are increasingly busy, and west going traffic on Alfred has to merge right at the point of proposed development.

Noted, see above.

<p>Housing a child care centre there would be a bad decision.! I will hold facilitators/developers to be contributors to any serious accidents involving children if this proposal is approved. There are good reasons why Town of Claremont and State Panel have said NO to previous application.</p>	
<p>44. Address not provided As local residents we support the application for the Proposed Child Care Centre at Alfred Road, see following reasons to support our feelings;</p> <ul style="list-style-type: none"> • The need for additional child care facilities is important to the local working parents • We have found the selection of available child care is limited and often wait lists apply • Child Care Centres are helpful in building local friendships and often these children will continue to junior and senior schooling together • We do not feel that Child Care centres have any negative effects on the local community and are often very secure and not a noise risk 	<p>Noted, see above.</p>
<p>45. 75A Strickland Street, Swanbourne We live in the southern section of Strickland Street in Swanbourne, a couple of blocks from this proposed development. Where we live, Strickland Street is a cul-de-sac whose only access is from Alfred Road. We are therefore very frequent users of Alfred Road, in both directions.</p> <p>We are writing to express our concern about the revised application for the development of 162 — 164 Alfred Road Swanbourne as a child care centre. This application is for a large scale, commercial childcare centre located in a residential area. We are of the view that there are strong and valid reasons for objection to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for our objection include the following.</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Trip continuation of vehicles does not appear to be realistically represented. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

1. A large, scale commercial development for occupation by up to 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.

2. The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One has resulted in a 10 year old boy critically injured.

3. Approval of this development on this corner is irresponsible. The likelihood of serious injury or worse is significant given the traffic chaos that will be caused with traffic heading to city and 3 local schools, children riding to school along and across Alfred Road and local residents trying to gain access to Alfred Road and cross it.

4. In the new plans, all cars will need to leave the proposed development via Butler Avenue. This will create significant traffic difficulties. In the peak period between 8 am and 9 am, 70% of the traffic travels east towards the city. Thus, while the developers have added an entrance for west-bound traffic, the bulk of the traffic in the morning headed for the proposed child care centre will be east-bound and will need to turn right into Butler Avenue. Similarly, as the only exit is onto Butler Avenue, the bulk of the traffic leaving the child care centre will need to turn right into Alfred Road to travel eastwards. This intersection is already under duress.

5. The traffic modelling provided by the developer on page 9 of the Transcore report is unrealistic for the following reasons:

a. It claims 70% of traffic in the morning peak period will come from the east. There is no basis for this claim. There are already many childcare centres to the east in Claremont and Nedlands, but very few to the west. In addition, 70% of the general morning peak traffic comes from the west travelling eastwards – compounding the traffic nightmare that will be generated.

b. All traffic leaving the proposed child care centre will need to leave on Butler Avenue and 70% of them will want to turn right and travel east along Alfred Road. The revised plans do not address the likely resultant traffic chaos.

<p>c. There must be serious doubt about the calculations and assumptions behind Figure 2.</p> <p>d. Figure 3 has been modelled assuming 70% of morning peak traffic comes from the west travelling eastwards, and that it will then return westwards. However, it is common sense to expect that most of these working parents will in fact continue eastwards to the City of Subiaco to work after dropping off their children. The claim that only 7 parents would want to exit Butler Avenue to the east in the morning peak period is nothing more than a wild guess.</p> <p>6. The plans assume that staff will be required to park on the street, with only 0.5 bays per person provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. Services only commence at 8:05 am from the city whereas the centre opens at 6:30 am.</p> <p>7. The centre will be open from 6:30 am until 6:30 pm and the Transcore report claims that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05 am, this claim is invalid. Staff will be unable to use this as an option.</p> <p>8. Butler Avenue has a steep incline up to Alfred Road and is not very safe near the top end, with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.</p> <p>9. The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –</p> <p>a. The plans need to be considered suitable from a traffic safety point of view – they do not deal with the current blind spot for west-bound traffic (together with merging), 4 intersections in close proximity and the limited visibility on Butler Avenue.</p> <p>b. A centre such as this should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (the plans fail to meet all 3 of these concerns). The planned childcare facility is close to a major intersection</p>	
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(Rochdale Road and Alfred Road) and an intersection that is already under pressure (Butler Avenue and Alfred Road)

c. WAPC Planning Bulletin 72/2009 does not allow access directly from a primary or regional distributor road, a right of way or short access road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac).

10. In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. An additional 228+ cars per day will have a hugely negative impact on the surrounding neighbourhood (an increase in traffic of more than 150%).

11. The visibility on Alfred Road for westbound traffic is poor. There is a bend in the road near the Butler Avenue corner and a driver cannot see beyond the curve of the road on the left side.

12. Travelling westbound between Rochdale Road and Butler Avenue the traffic also merges which, during peak hours, causes congestion. This would be exacerbated by the traffic using the proposed child care centre.

13. Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour (in fact, at any time).

14. In the mornings, turning right onto Alfred Road from Butler Avenue, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.

15. If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily be visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue.

16. The intersection directly to the west, of Narla and Alfred Roads, is extremely busy and is in close proximity. Narla and Devons road are popular access roads to the Claremont shopping centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.

<p>17. Many people with dogs travel to Lake Claremont via Butler Avenue and, for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.</p> <p>18. The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other involved someone trying to pull out of Butler Avenue onto Alfred Road.</p> <p>19. There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Childcare centres are more appropriately co-located with schools.</p> <p>20. How can the Council effectively police adherence with the requirement that "waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors," and that "In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose"?</p> <p>21. The internal space for the revised plans is a lot larger than the original scheme (nearly 30 square metres larger) and much larger than legally required. Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today. In our view the Council should strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>46. Address not provided I am currently living with my family in Swanbourne, next to Allen Park.</p> <p>I'm sending this email to support the application for the Proposed Child Care Centre at 162 & 164 Alfred Rd, Swanbourne.</p> <p>I'm father to two young kids, my wife and myself would love to have an extra childcare around as right now there is only one centre really close to our</p>	<p>Noted, see above.</p>

<p>home. I know family friends around the area with young kids would love an extra option too. We fell in love with beautiful Swanbourne also because of all the young families around and quite frankly for us every extra facility that can help us and the development of our kids is just a blessing. We strongly believe that good healthy environments are essential for the development of the kids and just good for the community in general.</p> <p>I support and vote YES for this development.</p>	
<p>47. No address given As a frequent commuter in this area I am concerned about the impact on traffic this development will have. There are other areas that could rather be viewed as more favourable.</p>	<p>Noted, see above.</p>
<p>48. 25 Swanway Crescent, Swanbourne It has come to our attention that after overwhelming objections from relevant authorities to the above development, the developer has re-submitted an amended application which is still in breach of many rules.</p> <p>Our objections to the application included the following:</p> <ol style="list-style-type: none"> 1. The proposed site is about 100m from Rochdale/Alfred Road traffic lights and sits in a blind spot for west bound traffic due to the bend in Alfred Road. 2. The Alfred Road/Butler Avenue intersection is hazardous. particularly at peak hours. There have been 3 serious accidents along this strip in the last 3 months. 3. The application does not comply with WA Planning Commission guidelines which stipulate that the child-care facility cannot be close to major road intersection for safety reasons and it should not impact the amenity of the local area. 4. Traffic assessment report done by the developer does not address safety and local amenity impacts. 	<p>Noted, see above.</p>

<p>49. 12 Butler Avenue, Swanbourne</p> <p>We are residents of Butler Avenue Swanbourne and are writing regarding the revised plans for the Child Care Centre. The second application still does not comply with the WA Planning Commission guidelines which state Child Care Centres:</p> <ul style="list-style-type: none"> a) Must be located in a commercial, community, recreation or educational area. b) Cannot be close to major road intersection where there may be safety concerns. c) Access from a local street must not impact the amenity of the area. <p>The proposed site is in a Residential Area. The new traffic assessment report by the Developer does not address safety and local amenity concerns as the Butler Avenue/ Alfred Road intersection is already dangerous due to poor visibility because of the bend. The increased traffic flow will add to more accidents and injury. I ask that the Council and the State Administrative Tribunal reject this revised applications for the same reasons the original application was rejected by Claremont Council and Metro West JDAP.</p>	<p>Noted, see above.</p>
<p>50. Mt Claremont</p> <p>I wish to express my disgust at the situation where, despite non-compliance, danger, community disapproval and several refusals by council and government, the developers who have put forward this ridiculous proposal for a childcare facility on a dangerous intersection in our residential area are still able to press for its acceptance. Please oppose this imposition in the strongest way.</p>	<p>Noted, see above.</p>
<p>51. Butler Avenue</p> <p>I have been a resident in Butler Avenue, Swanbourne for 19 (nineteen) years and I wish to express my alarm and grave concerns at the revised submission for a Child Care Centre at 162 – 164 Alfred Road, Swanbourne.</p> <p>The current application is for a commercial Child Care Centre in the midst of a residential location. There is limited parking within the facility and NO available commercial parking nearby. It is positioned on the corner of Alfred Road and Butler Avenue (a no through road).</p> <p>The entry into the proposed Child Care Centre is to be off Alfred Road, less than 100 metres from the traffic light intersection between Rochdale Road, Alfred Road, and Myera Streets. All these streets are one lane each way.</p>	<p>Noted, see above.</p> <p>Noted, see above. It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional</p>

The only exit from the Centre is into Butler Avenue then a left or right turn onto Alfred Road. Directly opposite the Centre's entry is a bus stop! During set down and pick up of passengers at this stop, traffic moving east along Alfred Road comes to a standstill. One cannot pass the stationary bus.

There are two more nearby entries into Alfred Road, namely Mayfair Street and Narla Road both of which add to the traffic congestion especially at peak times. Alfred Road is an existing thoroughfare road eastwards from West Coast Highway and already carries a large volume of traffic east and west including trucks and vehicles from the Swanbourne Army Barracks. There is a very real visibility hazard for drivers travelling east in the mornings and west in the afternoons, directly into the sunrise or afternoon sunset. At times, the sun is blinding. Combine this with the bend in Alfred Road between Rochdale Road lights and Butler Avenue AS WELL AS NO visibility from Butler Avenue towards the lights when there are cars on the south verge eg. turning into the Centre. This is a predictable, extremely dangerous, traffic nightmare each morning and evening ie. ten (10) times per week. Common sense must prevail or we will be witnessing numerous, terrible accidents involving cars and possibly human lives.

I sincerely do not wish to stand by and watch this disaster unfold, hence this email of extreme concern – this is the wrong position for a CCC. I am certainly supportive of Child Care Centres BUT, they MUST be in appropriate areas where safety is paramount for everyone. Not only is this a residential area, it is already congested with increasing traffic concerns. Many residences in Butler Avenue have a second car which is parked on the verge, coupled with family and visitors whose parking can only be on the verge. This development affects our quality of everyday life.

There are two residential blocks for sale immediately west of the Rochdale Road lights whose only access will be in and out of Alfred Road.

Considering the traffic congestion which exists in the area, I ask that you seriously address the prospect of 40 -60 more cars into the mix, attempting to drop off and pick up little children. Please imagine the entry off Alfred Road immediately after the traffic lights and then the exit out of Butler Avenue and onto Alfred Road. Drivers are frustrated even now at the difficulty experienced particularly trying to turn right onto Alfred Road from Butler Avenue at busy times.

(unexperienced children) pedestrians or cyclists. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.

Noted, see above, it is considered the site is not suitable for a Child Care Centre of this size due to the site specific issues. It is likely that the Centre may impact negatively on the residential amenity of Butler Avenue.

<p>I especially ask that you take a moment to consider how much time it takes to park ones car, safely, in the limited car parking places within the Centre, get one or two children out of their car seats, collect their backpack, walk into the Centre, wait until someone is available to register your child/children, farewell your child and leave safely. In my experience, this process will take approximately 9-10 minutes per car.</p> <p>There will be a huge backlog of car queuing, frustration and probably attempts to find alternative parking on a street which has cars parked on the street already. This is a residential area!! Parents will be excessively frustrated as they try to get to work on time.</p> <p>Pedestrians are only partially catered for as there is no continuous footpath in Butler Avenue and walking on south Alfred Road either way will be like playing “dodge-em” with traffic travelling east and west as well as turning into the Centre.</p> <p>Cyclists are in the same predicament.</p> <p>This also includes utility vehicles – rubbish collection, food and grocery delivery daily, office and play materials, play equipment deliveries, laundry collection and deliveries, maintenance, cleaners, staff and of course, visitors for Grandparent Days, performances, parent interviews etc. Child Care Centres are very busy hubs where parent/family interaction is encouraged – therefore, even more cars in the area.</p> <p>In conclusion, I strongly urge you, in your experience and wisdom, to responsibly acknowledge the numerous and overall, potentially catastrophic situation the proposed development will undoubtedly cause if allowed to proceed.</p> <p>I trust in your better judgement.</p>	
<p>52. 7 Butler Avenue, Swanbourne We are the residents and owners of 7 Butler Ave Swanbourne and wish to express our objections to the recent application to the MWJDAP for a development at 162&164 Alfred Road, Swanbourne – Proposed Child Care Centre.</p>	<p>Noted, see above.</p>

The reasons for our objection are as follows:

. The Centre is a commercial facility located inappropriately in a residential area

- ☐ The visual appearance of the child care centre is inappropriate
- ☐ The car park is inadequately screened from view from residences
- ☐ The traffic impacts of the centre will be unacceptable
- ☐ The noise impacts of the centre will be unacceptable
- ☐ The need for the child care centre is not established

Please refer to the following report for explanation and detail of the specific grounds for these areas of objection.

We request that the Council clearly reject this proposal and provide a compelling case to MWJDAP to also reject this inappropriate application.

We have reviewed the proposal for a 65 place Child Care Centre at 162 and 164 Alfred Rd against WAPC Planning Bulletin 72/2009 Child Care Centres (PB72), Town of Claremont Local Planning Scheme 3 (LPS3) and Local Planning Policy 206 - Child Care Centres (LPP206)

The Centre is a commercial facility located inappropriately in a residential area. PB72 section 3.2 Objectives states that one of the objectives of the WAPC policy is to "minimize the impact of a child care centre has on its surrounds, in particular on the amenity of existing residential areas."

The proposed commercial centre is located inappropriately in an existing residential area on land zoned as Residential R20. In LPS3 Table 1 a Day Care Centre is listed as "SA" in an area zoned Residential. This means that in exceptional cases only the Council may specially approve a day care centre where certain conditions are satisfied, including the following:

“any building to be erected on the land will not have any adverse or detrimental effect on the residents or on the amenity of or the properties in the locality”.

The proposal to inappropriate locate a commercial Child Care Centre in this residential area has previously been rejected by both the Town of Claremont and by the Metropolitan West Joint Development Assessment Panel (JDAP) because it was accepted that it would have an adverse or detrimental effect on the residents and the amenity of the properties in the area.

The State Administrative Tribunal (SAT) mediation process that preceded this revised application has not resulted in a scheme that is any more acceptable. The proposed Centre is not a small local one that will have minimal impact but at least a 65 place, 12 minimum staff now two storey commercial Centre that will cater to parents from out of the immediate area. The size, scale, height and form of the building, the large inadequately screened car park and access and the excessive amount of traffic and parking generated will all be detrimental to the amenity of the surrounding residential area such that special approval should not be granted.

LPP206 notes that preferred locations for centres are on:

“... lots zoned “Local Centre”, “Town Centre”, “Highway”, or “Educational”, or on “Residential” lots immediately adjacent to these zones,

The site does not comply with this provision as it is not immediately adjacent to any of the listed uses and the adjoining residential use is not compatible with a commercial Centre. The nearest education facility, Swanbourne Primary School, is isolated from the site by busy Narla Road and is over 400m from the site to the school buildings by the shortest route. If the manned Narla road pedestrian crossing is used the distance to the school buildings is in excess of 600m.

The visual appearance of the child care centre is inappropriate PB72 section 3.5 Design of Centres requires that:

“... In the absence of any specific provisions, the visual appearance of the development should reflect the character of the area, enhance its amenity ...”

LPS3 Clause 46 requires (among other things) that development in the Residential zone shall have regard to the following objectives:

(3) the continuation of the domestic scale and architectural character of the area of the proposed development;

(4) the preservation of the traditional housing character of the Zone;

LPP206 states "Visual appearance of developments should reflect the character of the area, enhance its amenity..."

The proposed large scale two storey commercial Centre does not continue the domestic scale of the street as is shown on the following streetscape.



The Centre is a taller and far larger building and car park than any adjacent house. The height of the now two storey Centre is excessive and out of scale with the adjacent residences. LPS3 Clause 40(3) nominates a maximum height of 6.6m in a Residential area, measured from the natural ground level. Most residences, including those in Butler Ave are far less than this maximum. The Centre is typically the maximum permitted 6.6m high to eaves, but this has been measured to the ground floor level which is higher than the natural ground level.

The Centre is 21.6m long facing Butler Ave and is 24m wide facing Alfred Rd, both dimensions being larger than the width of a standard block frontage in the area and far wider than the typical house street frontage. The area of paving required for parking and access is in excess of 670 sq m which is 80% of the area of a standard block in Butler Ave. The roof is excessively large and the design language associated with the framing for the large first floor play areas is heavy and out of context with a residential area and the weatherboard cladding is not typical.

The physical size of the Centre has actually increased since the previous application despite the reduction in the number of places offered. The original single level proposal was for a 624 sq m building with an additional 190 sq m of external covered Play space for a total area of 814 sq m. This proposal included 292 sq m of internal Activity space for the 87 place offered.

Despite the reduction in places by 22 the two storey 65 place proposal is for a larger 635 sq m building with an additional 238 sq m of external covered Play space, much of which is located on the first floor. The overall area is 873 sq m. The internal Activity space has increased to 330 sq m, which is enough for 100 complying places, 35 more than is proposed and far more than has been used to assess staff numbers, car parking requirements and vehicle movements. The excess of Activity space area is unexplained and results in a Centre that is at least 100sq m larger than necessary. The roofed area of the two storey proposal, including first floor covered play areas is 580sq m. The Centre roofed area is over twice that of adjacent residences.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

The car park is inadequately screened from view from residences LPP206 states:

"Landscaping shall not contain toxic plants, and be provided along street frontages with a minimum width of 2 metres compatible with adjoining residential properties and at a height which does not result in an access/visibility hazard at the access crossover."

The proposal provides one metre only of the car parking screening to Butler Ave and Alfred Rd, one metre less than is required. The 670 sq m of car parking and extended access way covers the whole frontage of the Centre to both streets and the activity and noise generated will be highly visible from residences with consequent loss of amenity.

The traffic impacts of the centre will be unacceptable. PB72 section 3.6 Traffic impacts states that a centre "should be approved only if it can be demonstrated that it will have a minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users."

LPP206 notes that access is not permitted directly from:

"...Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads."

The main entry if from Butler Ave which is a cul-de-sac and no through road. Butler Ave is not permitted under LPP206 to provide access to the centre. This entry is also only 35m from Alfred Rd which is less than is required by Figure 3.1 of AS/NZS 2890.1 Off Street Parking.

An Alfred Rd entry only for vehicles travelling west is proposed as well as a main Centre entry/exit from Butler Ave. Alfred Rd is a Distributor A road and the location of this entry is in a risky location that is obscured by the bend in the road, is too close to the Rochdale Rd traffic lights, and is in a dangerous zone where traffic is merging and where the afternoon setting sun reduces visibility. It is inevitable that accidents will result if this access is permitted.

The centre will generate excessive traffic, parking and queuing in Butler Ave which is a dead end residential street with a slope of 1:7 in the centre section. Twelve staff at least will be employed but only 6 staff parking bays are provided, one of which is a tandem bay. The extra traffic generated will access Butler Ave though the intersection of Butler Ave and Alfred Rd. This

intersection is already marginal at peak hours, as is the adjacent intersection between Narla Rd and Alfred Rd. The increased traffic and parking will negatively impact on the amenity of Butler Ave and will exacerbate the existing shortcomings and risks of the Alfred Road junction.

The need for a child care centre is not established PB72 section 3.8 requires that:

“if there is a demonstrable impact on the amenity of an area or the level of service enjoyed by a community the applicant should prove the need for commercial facility.”

LPP206 states:

‘In order to assess the impact to the local community on the impact a proposed Child Care Centre has on the level of service of similar or approved facilities, applications are to include information on the level of existing (or proposed) services in the locality, proximity to other centres, population catchments for the proposed centre and the number of primary schools and kindergartens in the locality, together with the number of students at these facilities.’

No information has been submitted establishing the need for a child care centre in the location, especially not the need for a 65 place commercial centre located in an existing residential area.

LPP206 also states:

‘Approvals should only be issued where it can be demonstrated that the Child Care Centre will have minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians, cyclists or road users.’

This report establishes that the proposal does not comply with this condition in many ways and that approval of the project would be at the direct cost of the amenity of residents of Butler Avenue and surrounding residential areas.

The noise impacts of the centre will be unacceptable. PB72 section 3.7 Noise Impacts requires that:

“where a child care centre is located adjacent to a noise sensitive area such as a houses, retirement villages and nursing homes, the noise generating activities of the child care centre such as outdoor playing areas parking areas and any plant or equipment are to be located away from the noise sensitive use. “

The noise of children playing may be a joy in small numbers, but the noise of many children from a 65 place Centre playing in a street facing first floor external play area is another case and the amenity of the immediate neighbouring houses will be negatively affected.

Conclusion

The proposed Centre breaches many of the planning regulations that are outlined in the applicable planning documents WAPC Planning Bulletin 72/2009 Child Care Centres, Town of Claremont Local Planning Scheme 3 and Local Planning Policy 206 - Child Care Centres

The proposed Centre is no more acceptable than the rejected scheme that preceded it.

It remains a commercial development of excessive size that is inappropriately located on a site zoned residential and that is surrounded by existing houses. The operations, size, scale and height of the Centre are not compatible with the neighbouring residences.

The building and activity areas provided are far larger than is required, leading to the possibility for future increases in the number of places offered. Parking provisions and traffic calculations take no account of any possible increases in places offered.

The proposal will create significant traffic and street parking in a quiet residential street that is partly steeply sloped, is a dead end and that has a problematic link with busy Alfred Rd.

There is no justification for the Special Approval required for the location of the Centre in an area zoned residential as the proposal is inappropriate and will significantly negatively affect the amenity of the surrounding residential area.

The proposal should be rejected.	
<p>53. 35 Lisle Street, Mt Claremont</p> <p>I would like to bring your attention to the danger of your proposed development at 162-164 Alfred Road with an actual example as described below:</p> <p>My son, Terence Leach, was hit by a speeding car as he was bicycling home from Scotch College. He was crossing Alfred Road from the south (Butler Road) with no car in sight. A car came spending from his right have just "beaten the lights" at the Rochdale intersection; the driver braked but still hit my son, who was very badly shaken, bruised and cut, but fortunately nothing more serious. Building more structures on this dangerous South East corner of the Butler/Rochdale junction is inviting tragedy. Please re-consider.</p>	<p>The TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists.</p>
<p>54. No address given</p> <p>I support the proposed child care centre.</p>	<p>Noted, see above.</p>
<p>55. No address given</p> <p>I support the proposed development for a childcare centre at the above address. This will be of benefit to the area and adds a much needed service to ratepayers. I cannot understand any reason that this development would not go ahead</p>	<p>Noted, see above.</p>
<p>56. 16 Myera Street, Swanbourne</p> <p>I am a resident of Swanbourne, in a street that enters Alfred Road near the proposed development, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p> <p>This is a very busy road, during the day and especially during peak hours and it is utilised by commercial vehicles, through traffic and many children either</p>	<p>Noted, see above.</p>

<p>walking or being driven to nearby schools, of which there are many. Further congestion will only cause problems and could lead to accidents.</p> <p>Furthermore, this is a residential area and a commercial enterprise such as this does not sit well with the existing properties. There are no other commercial activities in this area.</p> <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>57. 3 Lisle Street, Mt Claremont</p> <p>I am a resident of Mt Claremont, and a frequent user of Alfred Road, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p> <ul style="list-style-type: none"> • In the new plans, all cars will need to exit via Butler Avenue. This will increase traffic congestion. During peak morning hours, between 8am and 9am, 70% of the traffic travel east towards the city. While the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. The only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress. • In peak hour, getting out of Butler Avenue turning east onto Alfred Road (toward the city) is already difficult due to high volumes of traffic and the poor visibility due to the bend in the road, and the position of the sun. At times the glare is amplified by the sunlight and reduces visibility significantly. • The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic. Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. The modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents 	<p>Noted, see above.</p>

<p>will thereafter need to continue to travel east along Alfred Road to the city or Subiaco to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.</p> <ul style="list-style-type: none"> • The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option. • The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe. • The impact of additional 228+ cars per day will have a huge negative impact on the surrounding neighbourhood (150% + increase in traffic) • The developer makes an unsubstantiated claim on page 8 that " As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full. <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>58. Address not given My wife and I are currently looking at purchasing in the area and have noticed a lack of child care centres in the area.</p> <p>I support the application for the Proposed Child Care Centre and do not believe there will be any negative effects of such a development on the immediate or surrounding areas.</p>	<p>Noted, see above.</p>
<p>59. Address not given I support the application for the Proposed Child Care Centre.</p> <ul style="list-style-type: none"> • I believe the development will be an added benefit to the community and I have a young family and have noticed that there is a shortage of child 	<p>Noted, see above.</p>

<p>care centres in the area. This is a much needed development for the community.</p> <ul style="list-style-type: none"> I do not believe there will be any negative effects of such a development. Therefore, the more childcare centres the better, I vote YES for this development. 	
<p>60. Address not given I would like to register my support for the proposed child care centre to be located at 162 & 164 Alfred Rd, Swanbourne.</p> <p>I am not an immediate resident but I am a devoted community member, regularly frequenting:</p> <ul style="list-style-type: none"> the local gym with my wife and children, Claremont shopping centre, and Cottesloe Golf Club. <p>While I do not believe in inconsiderate development, I do believe in affording the community options and providing diversity in employment opportunities, both of which the child care will provide.</p> <p>Please consider this email as my formal endorsement of the proposed application.</p>	<p>Noted, see above.</p>
<p>61. Address not given I support the application for the Proposed Child Care Centre. I believe the development will be an added benefit to the community.</p>	<p>Noted, see above.</p>
<p>62. Address not given As a resident of the area I strongly support this development.</p>	<p>Noted, see above.</p>
<p>63. Address not given I support the application for the Proposed Child Care Centre. I do not believe there will be any negative effects of such a development.</p>	<p>Noted, see above.</p>

64. 11a Cornwall Street

I am a resident of Swanbourne, (and a frequent user of Alfred Road) and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

It is already extremely difficult to turn onto Alfred Rd from Narla St. The increased traffic from a childcare centre would make it impossible.

- This application received the most objections of any development in the last DECADE in July 2019. The Town of Claremont said NO. The State Panel said NO. Now they have appealed to the Tribunal. We MUST STOP these greedy developers.

- How is it fair that they can bypass the Government, our representatives and the community?

- Proposed location is ~100m from Rochdale/Alfred Rd traffic lights and sits in a blind spot for west bound traffic due to the bend in Alfred Rd. This is where traffic must merge

- Alfred Rd/ Butler Avenue intersection is hazardous – particularly in peak hour. In the last 3 months, there have been 3 serious and life threatening accidents along this strip

- The application does not comply with the WA Planning Commission guidelines which stipulate:

1. Cannot be close to major road intersection where there may be safety concerns

2. Access from a local street must not impact the amenity of the area

3. Must be located in a commercial, recreation, community or education node

Noted, see above.

It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Analysis of the nearby intersections of Narla Road and Mayfair Street have not been undertaken. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.

<ul style="list-style-type: none"> • Traffic assessment report done by the developers does not address safety and local, amenity impact. <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>65. Address not given I'd like to express my concern over the proposed development of 162 - 164 Alfred Road in Mount Claremont.</p> <p>The road traffic conditions on that part of the road are already difficult to deal with in the mornings and even more treacherous in the afternoons with the sun in your eyes. The combination of a bend in the road causing a blind spot, traffic congestion from the near by traffic lights - 100m away, an incline, plus sun, making navigating that strip stressful and often dangerous.</p> <p>To then introduce heavy traffic at peak hours, from a Public facility, entering Alfred Road on the same blind spot bend, along with previously mentioned other challenges is alarming. Not to mention the safety of all the children involved with a child care facility.</p> <p>The impact of the additional traffic from Aria apartments has already impacted significantly and negatively, on the peace and general amenity of the area.</p> <p>Surely a development of this nature should be in a safe area designated for commercial services, not smack bang in the middle of a residential area already strained by development and dealing with a busy, dangerous stretch of road?</p> <p>Please object to this development proceeding and uphold the decision of The Town of Claremont and the State Panel, back in July 2019. The local residents and many commuters who use Alfred road expressed their concerns earlier in the year. I'm confused as to why we are all being ignored.</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

<p>66. 30A Langler Street, East Victoria Park I support the application for the proposed child care centre at 162 – 164 Alfred Road, Swanbourne WA. I have a young family and have noticed that there is a shortage of childcare centres in the area. This is a much needed development for the community.</p>	<p>Noted, see above.</p>
<p>67. Address not given I support the application of the proposed child care centre. The area is currently under supplied and the location makes sense for access.</p>	<p>Noted, see above.</p>
<p>68. 71 Strickland Street, Swanbourne I have read available information about the amended submission for a proposed very large Childcare Centre at 162 & 164 Alfred Road, Swanbourne, and still consider this to be far too large and unsuitable a use for this suburban residential area.</p> <p>Another major objection is the very adverse impact this project will have on already busy roads (Alfred, Rochdale, Myera, Butler, Narla Mayfair and nearby streets), especially with the very heavy use at peak hour School times, with so many schools and colleges in the vicinity and the heavy traffic flow towards Perth City and other suburbs. It is already very difficult and dangerous to exit these streets, especially to make right-hand turns, when driving east or west looking into the rising/setting sun.</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>
<p>69. 8 Butler Avenue, Swanbourne I wish to lodge my formal objection to the referenced development for the reasons as set out below</p> <p>My original objections were premised on:</p> <ul style="list-style-type: none"> - Location/traffic - Danger to pedestrians using Butler Ave for access/egress including Claremont Lake - Parking - The unsuitability of a commercial business in a quiet residential street 	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

The Town of Claremont denied the application on the basis of:

- Detrimental to amenity fo residents
- Increased traffic
- On site parking
- Incompatible architectural style
- Not within a preferred zone
- Sire of insufficient size
- Flawed Traffic Impact Statement
- Noise

Having now reviewed the resubmitted application I note no material changes to the proposal that would overcome neither mine nor ToC's objections above. It remains that:

1. The location of the proposed child care centre remains exactly at the point where the traffic going West merges from two lanes into a single lane. At peak hours when the centre will be at its highest level of activity then the traffic turning right after having come down Alfred Road form West Coast Highway will pose an accident risk and certainly impede the flow of traffic. Traffic going East towards West Coast Highway will likewise impede traffic flow. Moreover when cars pull out of Butler Ave they will pose an accident risk and impede flow. Also note that the traffic on the road heading East is borderline for two lanes at this point and hence more obstruction to traffic with commensurate accident risk. Traffic on Alfred Road is heavy at peak hours and will only be detrimentally affected by this proposed development.

2. Butler Ave still has no pedestrian pavement but is used by local residents as an access means to Claremont Lake, which is fine given the street is a one way with minimal traffic. People cross directly opposite Butler Ave and to expect them to do so at Myera Street is nonsensical. The child care centre will impact this use of Butler as a means of Access to Claremont Lake and

<p>would I suggest give rise to accidents. Please bear in mind the issue is that arise at school drop-offs with mothers driving SUV's consider this in a suburban street with no through access and no real pavments.</p> <p>3. The Transport Impact Statement itself advises that there are insufficient parking spaces ta the proposed development but suggests that public transport will be used by workers – this is nonsense. Workers will use cars if they have one and hence the hypothesis is flawed in this and many other areas.</p> <p>4. Lastly this development is a commercial business which has no place in a residential area regardless of its intended use – it is not a community benefit but an inappropriately sited development in a quiet residential area. I trust the above demonstrates the total unsuitability of this development for the proposed location and must firmly request ToC to deny planning permission.</p>	
<p>70. 12A Myera Street, Swanbourne Our family home at the south end of Myera Street is a block away from the proposed childcare centre on 162 & 164 Alfred Road, Swanbourne. We are deeply opposed to the revised application. Indeed, we are opposed to any proposal for these lots, except residential housing as it is currently zoned for, as there is a high demand for housing in this area.</p> <p>The proposal is legally and morally wrong. The proponents have used the oldest ploy in the development book: buy the land on speculation and then request rezoning to suit their purposes and make a profit, not to enhance and better the community. The commercial centre is not wanted in this residential neighbourhood.</p> <p>We have the following concerns regarding this proposal:</p> <p>Residential Zoning Residential zoning is created to help make neighbourhoods quiet and beautiful and prevent them from being inappropriately developed, as proposed here. If approved, this proposal could also set a precedent for further commercial development in the area that is not in keeping with the residential character. The proposal would erode the beauty, the peace and the green space in the area.</p>	<p>Noted, see above.</p>

The lots in question, totalling 1850m², are currently zoned R20 for residential housing (20 houses per hectare), which means 3 houses (and potentially 4) could be built on this site. We do not support a change in the code to enable a commercial enterprise. We would support 3 houses being built on the site, which ideally would limit the footprint of the houses, the number of cars, the amount of parking space, while maximising the garden/green space and trees.

Traffic and Noise

The traffic report is difficult to read and unconvincing. It seems the traffic volumes are underestimated. Given the number of students and staff proposed, we would estimate an additional 65-78 cars at each morning and afternoon peak hours. Most of this traffic is likely to occur within a one-hour period. The added traffic noise and car door slamming will not be appreciated by the adjacent residents, particularly in the early morning. It will make Alfred Road in this area more dangerous, adding to waiting times to enter Alfred Road that can already exceed 2 minutes.

Amenity

A commercial enterprise is not conducive to a residential area. Potentially a few good families and neighbours will be lost from the area. Approximately half of the development will be a car park. This is dead ugly for a residential neighbourhood and not welcome. It will also increase runoff. There does not seem to be any plans to retain the rainfall on the site for the remaining trees and surrounding vegetation.

Environment

It is hard to tell from the plans how many trees will be destroyed. We estimate at least a dozen. And we do not trust that the trees marked to be retained will actually be retained. Tree retention on development sites in Perth is appalling. With climate change and a drying climate every effort should be made to retain and increase tree canopy, not destroy it. Tree and shade are vital for local cooling and improving air quality, mental health and well-being, as well as for Perth's unique wildlife, particularly insects and birds.

The latest proposal is fundamentally the same concept as the previous one which the community and the Town Council vehemently opposed. No

<p>changes will make it acceptable because this is a residential area, zoned for residential housing, not a commercial enterprise.</p> <p>We would like the Council to completely reject this application and present a strong case to MWJDAP to request that the lots are developed for their intended purpose: residential housing with a design code of R20, preferably done in a beautiful and environmentally sensitive manner.</p>	
<p>71. 5 Butler Avenue, Swanbourne</p> <p>As the property owner/occupiers of 5 Butler Avenue, Swanbourne we wish to make a submission expressing our deep concern and opposition to the proposed child care centre to be situated at 162 Alfred Road and 164 Alfred/Butler Avenue corner.</p> <p>The reasons for our objection are as follows:</p> <p><u>Residential Impact:</u></p> <p>The proposal is for a large commercial (for profit) Child Care Centre located in a wholly residential area. This will impact unfairly on the quality of life of the residents of Butler Avenue, in particular, and surrounding residential properties.</p> <p>The operating hours of the child care centre from 7.00am – with the probability of staff arriving at 6.30am – will cause unfair disturbance and noise to the residential home immediately adjacent to the entrance and car park bays. The 3 residential homes opposite the entrance all have front bedrooms facing Butler Avenue and will similarly be disturbed by the noise of cars, car doors and general noise of people talking etc. During the early morning hours of the winter months it will be necessary for the child care building and car park to be lit, again causing unfair disturbance to the adjacent home and the homes opposite with street facing bedrooms.</p> <p><u>Dangerous Blind Corner Exit and Congestion</u></p> <p>Butler Avenue is a small residential cul-de-sac, entering/exiting at Alfred Road, and is a short distance from the Rochdale Road/Alfred Road intersection controlled by traffic lights.</p> <p>The exit from Butler Avenue sits on a blind curve from the traffic lights at the Rochdale Road/Alfred Road intersection. Exiting right out of Butler Avenue</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

<p>at any time of the day is hazardous due to the blind curve and vehicles traveling fast through the lights towards the West Coast Highway. Vehicles frequently speed through the lights to avoid a light change. The revised plans now show a left entry to the carpark for cars travelling from the East. This entry is a short distance from the lights – cars slowing to enter increases the danger for cars travelling West through the lights. Cars using this entry will also obstruct the vision of cars waiting to exit left and right from Butler Avenue.</p> <p>This new entry crosses over a pedestrian pavement which is heavily in use during morning and afternoon peak hour traffic, with children walking/cycling to/from Swanbourne Primary School and pedestrians walking to/from the bus-stop situated between Butler Avenue and Narla Road.</p> <p>This new entry just adds extra danger to an already busy and dangerous section of Alfred Road.</p> <p><u>Noise Impact on a Resident's Right to Quiet Enjoyment of their Property:</u> The revised building plans are for a double level building with upper level balcony play areas. The Plans show 5 Activity rooms – the Noise Management/Outside Play Time-Table seems complicated in the extreme and designed to confuse. It refers several times to provision for outside play for Activity Room 6 – this may be a typo error for Activity Room 3 – but it is not conducive to the accuracy or the understanding of this Noise Management Report.</p> <p>The Noise Management Plan/Outdoor Play Timetable shows that in Summer, when residents are likely to have open windows, between the hours of 7.00am and 8.00am, there will be provision for 36 children playing at ground level and 19 children on the outside balcony level 2. The noise generated by 55 small, boisterous children playing outside, adjacent to residential properties, can only be detrimental to the residents' right to the quiet enjoyment of their homes at this early hour.</p>	
<p>72. 149 Rochdale Road, Mt Claremont I am a resident of Mt Claremont and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.</p>	<p>Noted, see above.</p>

<p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows: I can't see any reason why we should have a child care centre in a residential area when there's plenty of space nearby in Stubbs terrace near the railway.</p> <p>The rush hour traffic is already very bad. We live half way up Rochdale Road and the queue starts here every morning for cars turning right into Alfred Road and this is where you want to build a day care centre.</p> <p>Old Mount Claremont has also unfortunately been re-zoned to 2 dwellings or more per block, which over a couple of years will increase the local traffic by even more.</p> <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	
<p>73. No address given I support the application for the Proposed Child Care Centre.</p> <p>I have a two young children (3 month old and 3 year old) and have found shortage of child care centres (or available positions) in the area. I also cannot see any negative effects of such a development at this location.</p>	<p>Noted, see above.</p>
<p>74. No address given Re the proposed child care centre at 164 Alfred Rd, Swanbourne, I support the application for the following reasons;</p> <ul style="list-style-type: none"> -I only believe this could benefit the community with no negative effects -it's great to see kids out and about enjoying themselves And learning great life skills which will only benefit the community -the small increase in traffic will be outweighed by having such a great resource in this area 	<p>Noted, see above.</p>

<p>75. No address given</p> <p>There has been a new development proposal for an 80 person childcare facility planned for 162-164 Alfred Road, Mt Claremont.</p> <p>This commercial development would be most unsuitable right in the middle of established housing and only a few metres from traffic lights at corner Rochdale Road and Alfred Road. Also, the amount of pollution coming from increased traffic would be detrimental to the children's health.</p> <p>Alfred Road already carries a heavy load and with extra traffic coming from Butler Avenue would dramatically add to the chaos and with children walking in all directions so close to the traffic lights, is waiting for disaster to happen.</p>	<p>Noted, see above.</p>
<p>76. 13 Butler Avenue, Swanbourne</p> <p>I have looked at many charts and numbers which support the use of a childcare centre at that location but these numbers and charts would be in the favour of those who are paid for.</p> <p>I have lived in the street since 1969 and had been witness to many changes to the suburb which favours the community.</p> <p>In all the action and protests with paper warfare flying everywhere I just like to come down to some commonsense and logic as to the practicality of a childcare centre at that location with entry to and from Alfred Road which is a busy street with continuous flow of traffic throughout the day especially in the morning and evening's.</p> <p>We who live in the street know the dangers that the company and effort to enter onto Alfred Road from Butler Avenue in these busy times. The main problem is if doing a right-hand turn you cannot see the traffic coming towards you because of the lay of the land and a curve in the road.</p> <p>Through the years I have practised the art of seeing the top of the traffic lights waiting for them to turn red and then one would assume that no traffic will come through on your right but in this day and age is common for drivers to pass through the lights even on red and to do so they accelerate meaning they come around the corner a lot sooner than you can expect and both drivers get a fright as to how close an accident could have been.</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

So those leaving the centre not knowing the risk it would be expected very soon for an accident to occur.

When looking at the methods all ways that traffic would enter into the premises and at a point when cars are also leaving there will be a natural banking of cars which wouldn't take long to get to Alfred Road and interfere with that traffic.

On the other hand I can see drivers taking the easy way and parking on the verge and walking the children in and then to turn around they would drive down to the bottom of Butler Avenue and used as turning circle.

My concern is that an amount of traffic and that we as residents of Butler Avenue will now have to interact with 40 to 50 cars each day.

Clearly this suburb or area is zoned as residential and as such it should remain residential without somebody pushing the way in with a commercial opportunity something which will affect everyone from those using Alfred Road and in particular Butler Avenue at the top where the interference for the homes directly across and the noise factor of cars moving in the and children and adults talking. There is no reason. Why this area needs a childcare centre and in particular why you would put one on a busy road where drivers will cause problems coming in and going where it wouldn't take long for an accident to occur in a child to be injured.

Therefore it doesn't matter what documentation is put forward to support the case of a childcare centre when it is a residential area and the movement of traffic will simply be pathetic and dangerous.

Before anyone gives an approval they need to come out and look at the site and look at what they are given the approval for.

This street like Myera Street as a unique character of being a no through road with the minimum traffic and this holds our residential prices at a fairly high level and with a childcare centre see our investments will definitely decrease especially those living across the road where the interference is that a person's front door.

<p>So therefore when looking at all the facts and figures to support a childcare centre it would be necessary to look at the effect it will have on us the residents of the street. We will have further cast are content with will have noisy cars driving up and down the street and the bottom line is everybody as a resident is protected with the value of the property with the areas being zoned as residential living commercial interests to go to those areas which the Council has set aside for business interests.</p> <p>So is with this logic is cars turning left into the driveway coming across cars leaving the premises and having to slow down to a crawl with other cars coming in behind it won't take much for the traffic to float back onto Alfred Road, then those wanting to right into Butler Avenue will simply have to wait until the queue of left-hand turners reduces and provides an open space.</p> <p>It is unfortunate that some people have the arrogant attitude of what they do is what they get without considering the effects the actions are having on other people.</p> <p>I find it interesting where initially it was said to be 100 children but then for the benefit of SAT another report came out saying 68 children then another one came out reporting 80 children so the question is how many children are they committing this program for and are they the types where if the centre is set up and running after a few months they simply sell off the commitment and the problems are no longer there's. If by some chance this application is approved then the council and the residents would need to have a closer look at the building plans to make sure they are accurate.</p> <p>That is all I have to say at the moment, so as you see on the after a scientific resolution just common sense and logic and the understanding of others that this project should not doing further for the simple reason to many kids the area would be too dangerous and I certainly hope that the Pope staff can also realise the benefits of this new system which will enable a person to correct the club imposed throughout the year where it becomes part of the bedroom so for now I had nothing more to say.</p>	
<p>77. 170A Alfred Road, Swanbourne I am a resident at 170a Alfred Rd Swanbourne and I am writing on behalf of my family to express our concern about the revised application for 162 & 164 Alfred Road Swanbourne – Proposed Child Care Centre.</p>	<p>Noted, see above.</p>

<p>This application is for a large scale, commercial childcare centre located in a residential area.</p> <p>We strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for our objection are as follows:</p> <p>We have some serious concerns as listed below with regards to, but not limited to the following</p> <p>Safety The proposal is to have a large day care situated in a residential area on the corner of a very busy arterial road and an uncontrolled residential street (Butler Ave).</p> <p>The safety of both clients and existing residences will be put at risk in accessing Alfred road during the peak times, with the access to Butler Ave being on a blind corner.</p> <p>In the morning traveling East the traffic will be attempting to turn across traffic traveling West, with the sunlight directly in front and within the time frames of the school drop offs.</p> <p>The reverse will be the case when picking up children from the proposed day care centre, with traffic being held up whilst traveling west on a blind corner and driving into the western sun.</p> <p>The safety issues are not limited to vehicular movements but also pedestrian foot traffic using the existing foot path down southern side of Alfred road, particularly during school times.</p> <p>Amenity We feel the amenity of our area would be put at risk with the approval of such a large commercial venture.</p> <p>This would include a lot more noise, and traffic, and have a have an adverse effect on the amenity of the neighbourhood.</p>	<p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>
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Traffic

It is suggested the proposed Day-care will have 65 children, the majority of the children will be dropped off by car and there will be full time staff members this would equate to around 140 additional movements each day without taking into account delivery trucks, additional visitors, educators, or cleaning staff.

Given the experience of the Aria complex and the very negative affect that had on traffic flow and the proposal is in a very concentrated school zone, including Swanbourne Primary, John XXIII, Graylands Primary, Scotch, Christchurch and Shenton College, the main time that the centre will be accessed is during the busiest times of day.

Alfred Road is already struggling to flow during the peak periods and has not been designed in such a way to accommodate additional traffic.

Whilst it may be suggested that the drop offs may be staged or buses used, the reality of it is, that most parents will drop off the children whilst making their way to work.

That along with turning across the traffic and slowing traffic in both ways is recipe for disaster.

In approving the proposed development, the persons vested with such responsibility, have an ongoing moral and ethical duty of care to ensure the safety of all parties.

Given the area is already serviced by 3 large day-care centres and a number of smaller or family day-care centres, it could be safely suggested the majority of the clients will come from the surrounding suburbs and in doing so add to the traffic on Alfred road and in the overall suburb.

Zoning

The properties are zoned R20 indicating a single residential zoning, in approving the proposed development would require a change of the zoning of the properties and again affecting the amenity and resale value of the adjoining properties.

Precedent in changing the zoning of the property, it sets a dangerous precedent which serves to undermine the effectiveness of the Town Planning Scheme.

Parking

Whilst there are a number of parking bays proposed and a drop off zone, my professional experience in these matters would suggest a lot of the parents would be staying to settle the children in, given the age of the children, this would result in a lot of them requiring parking in a concentrated time period, particular during the drop off.

This would inevitably result in parking in Butler Ave and possibly on the verge of Alfred road adding to the congestion. One would only have to look at the drop off and pickups at Swanbourne Primary or North Cottesloe to gauge an insight into the issues attached to such a large centre.

It could result in a duplication of the Strickland street precinct during the busy periods.

Noise transfers

Whilst the sound of children playing is a normal part of life, having 65 children in a very small area is not and is not in keeping the low R20 single residential zoning.

Duplication of services

Whilst the applicant is making a commercial decision for a day care centre, (let's face it they are not doing it for a community service) it could be strongly suggested that the area already has an oversupply of day care centres including Jelly Beans (Swanbourne), One Tree (Swanbourne), Annie's Play School (Mt Claremont), Tiff's House (Swanbourne), Tiny Beez (Alfred road) Camp Australia (Swanbourne Primary) Smart Start (Swanbourne), Jellybeans (Mt Claremont), Challenge Stadium Day-care, along with pre kindy at Scotch College, pre kindy at Christchurch Grammar and an Early Learning Centre at MLC (6 months to 4 years) just to mention a few.

Due process

The developer's action in making the application to the Metro West Assessment panel in lieu of going through the normal due process via the Town of Claremont indicates, in my opinion, the deceptive nature of the

<p>applicant in order to circumvent the normal advertising period and professional under structure of the Town.</p> <p>Through previous experience, the developer may have learnt that making applications through the Town or City did not represent their best commercial interest and have opted to have it dealt with through MWJDAP.</p> <p>Thank you again for the opportunity to comment on the proposal and hopefully contribute to a positive outcome for the community and not just one developer.</p> <p>We, as a family living on this extremely busy street ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>78. No address given I support the application for the Proposed Child Care Centre.</p> <p>I believe the development will be an added benefit to the community</p>	<p>Noted, see above.</p>
<p>79. No address given I am a resident of the area and I support the application for the Proposed Child Care Centre.</p> <p>I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.</p>	<p>Noted, see above.</p>
<p>80. 62 Adderley Street, Mt Claremont We are residents in Mount Claremont and wish to register our objection to the above development for the reasons outlined by others namely:</p> <ul style="list-style-type: none"> • The application does not comply with WA Planning Commission Guidelines (see other objections) • The Traffic Assessment report done by the developers does not address safety and local amenity impact. <p>In addition to these matters it should be noted that:</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

<ul style="list-style-type: none"> • The application has followed the established process and been rejected. It is difficult to accept that it can be considered by another authority with the chance it may be approved. There is no sense in having a process and then allowing it to then be overridden at will. • This proposed development is not suitable for the area as it is a residential with no other established businesses. This should not be allowed to create a precedent for other developments that will impact on the amenity of the total area. 	
<p>81. 170 Alfred Road, Swanbourne</p> <p>Further to your recent registered letter notifying us of the revised proposal for a proposed development at 162/164 Alfred Road, Swanbourne I am writing to submit our Objection to this revised proposal.</p> <p>Having read the revised proposal we see nothing which mitigates the issues we have previously identified as the grounds for our objections. We applaud the town of Claremont for rejecting this proposal. This revised proposal pays lip service to a business development while completely overlooking the safety and logical element which underpins a natural objection to such a proposal.</p> <p>As a resident adjacent to the proposed development site we continue to see traffic congestion, chaotic behavior from drivers and observe near misses as two lanes merge into one lane travelling west bound from the traffic lights at the junction of Alfred Road/Rochdale Road junction adjacent to this proposed development.</p> <p>I would like to reiterate that the right hand lane Westbound at the traffic lights at Rochdale road should be made a right turn lane only (regardless of this development) due to issues at this junction. Placing an entrance to a Child Care Center within a few meters of this junction is madness.</p> <p>We are not happy that this issue has been progressed for consideration again following the Town of Claremont's rejection of its proposal. Furthermore we are provided with barely 5 business days' notice to respond. These timeframes themselves are questionable and reflect the tactics used to attempt to progress something that the majority and local government have clearly already stated their objection to.</p>	<p>Noted. See above.</p>

A summary of highlights from this revised proposal to supplement our previous objections (which still stand)

- Adding to the current levels of traffic heading Eastbound in the morning, having increased levels of traffic travelling eastbound queuing on Alfred Road to enter Butler Avenue while traffic queues at Butler Avenue to re-enter Alfred Road to continue to travel eastbound is ridiculous and multiple disasters waiting to happen. I often have to wait a long time to enter Alfred Road to travel eastbound. This will certainly result in accidents.

- Assumptions are being made about where clients will come from, how they will travel to and from the day Care Centre and at what times etc.,

These projections are largely unsubstantiated with a view to justifying this business development with disregard to common sense

- This site is an unsuitable location for a child care facility but this is being overlooked in the business interest. This is a residential area with children and adults walking to school, walking their dogs etc.

- I am also given to understand that this proposed development breaches the WAPC Planning Bulletin 72/2009 with multiple violations. This in itself would be a reason to reject this (revised) proposal.

- Insufficient parking available at the facility which will exacerbate the traffic / parking issues in the area / poor visibility on Butler Avenue and exiting to Alfred Road

- Multiple other child care services in the area - This development is far from necessary in principle anyway

- Inadequate parking is explained away with fantasy detail around a public transport infrastructure that does not support its model and is unsubstantiated.

- Favorable traffic studies with a lot of content in which there is conjecture and sophistry designed to project a business proposal with no regard to safety and common sense - Modelling that tells us clients will exit West (Assumption) - highly unlikely.

As per previous....

There are a number of negative factors which can be listed in our objection to this proposal but the most important and obvious objection is on the grounds of safety.

The current levels of traffic on this part of Alfred Road are very high at peak times and we, as residents, find ourselves waiting up to five-ten minutes in the morning trying to gain access to Alfred Road from our drive way. All it needs is one of the many proposed new car movements to attempt to turn right into Butler Avenue travelling East on Alfred Road during peak morning time to back up the traffic for a significant amount of time. The proposed level of increase to traffic as a result of this development would be simply untenable, dangerous and result in gridlock.

The site of the proposed development is directly adjacent to the intersection of Rochdale and Alfred Roads. This junction is a bottleneck during peak morning times and is compounded by the fact that in both Eastbound and Westbound directions on Alfred Road two lanes merge into one. In the Westbound direction on Alfred Road, the section of road immediately outside the proposed development site has a road traffic sign indicating traffic should merge. It is not, therefore, a suitable place to host a large number of increased traffic movements and parking.

Even at the current traffic levels, the two lanes that are outside the proposed development site at the traffic lights at the junction of Rochdale and Alfred Road should be segregated so that the left lane must turn left in the Eastbound direction and on the opposite side of the junction the right lane must turn right in the Westbound direction to force traffic to merge in a controlled manner before reaching the traffic lights. I have observed on many occasions reckless drivers attempting to overtake cars at this merge point and also on occasion I have experienced cars slam on the breaks behind me when I turn into my driveway. Despite indicating and slowing down my car in a controlled manner other drivers are not expecting traffic to turn in off Alfred Road having just traversed this junction. The proposed development site is even closer to this junction and will almost certainly result in accidents should the proposed new development go ahead with 90 child spaces and 13 staff requirements being allowed to proceed. Service vehicles will also add to this dangerous mix.

The traffic report attached to the application was favorable to this proposal (as expected) but failed to identify or analyse this adjacent junction of Alfred Road and Rochdale road. It appears to aggregate statistics and figures while deliberately focusing on the cul-de-sac of Butler Avenue and its intersection with Alfred road while choosing not to mention the very close proximity of this proposed site's position to the Alfred and Rochdale Roads intersection. Furthermore there is no mention of two lanes merging into a single lane at this portion of the road.

Another factor in this proposal which will compromise safety is parking and a severe lack thereof. Further to the proposed increase in traffic in this part of Alfred Road the report admits there is not sufficient parking to cater for this proposal and uses 'guess estimates', projections and assumptions to attempt to sugar coat this fact. This means there will be cars parking anywhere and everywhere. We have observed this first hand during the recent development of the Aria apartment block in the area. Drivers believed that any free space of ground is free reign for parking and on a number of occasions my wife and I have experienced close misses with drivers who park on the verge outside our home (driving behind a bus stop!) and attempting to exit on to Alfred Road by crossing our driveway. This verge was previously coated with mulch at our expense and cared for but now is in a state of disrepair as a result of the above.

Living next to the proposed development site and given that this section of Alfred Road is where the width of the road begins to widen we find drivers doing U-turns and parking on our verge and driveways to do drop offs for the bus stop immediately outside our property. This proposed development will see a tenfold increase in people needing to park but having nowhere to park and using our driveway and the verge behind the bus stop outside our home as a car park. Butler Avenue also has a steep incline and will become dangerous as cars turn into the cul-de-sac and desperate to find parking scan the length and breadth of the road. Double parking and two way traffic with un-announced stopping of vehicles and passengers with children doing drop offs in the middle of the road all make for accidents waiting to happen.

I received a registered letter inviting me to respond to this proposal on May 8th 2019 with a deadline of May 21st 2019. I found this process of communication a little too hurried for my liking with no further consultation or

<p>announcements within the community. Indeed, when I walked passed the proposed development site there is no declaration of intent or mention of this proposal. I spoke to a neighbor who was not even aware of the proposed development. If I went on annual leave for any period of more than 14 days I would have run the risk of not having my say in these proposals due to this fast tracked process.</p> <p>Anyone with any common sense would agree with the dangers highlighted in this objection and so I am a little suspicious that the process is being facilitated using the least informative and quickest path. I am also concerned that the town planning process allows for the virtual circumvention of the Town of Claremont by addressing the application to a different body who are most likely not as familiar with these concerns.</p> <p>Why no signs on the site of this proposed development and why a period of less than two weeks to voice concerns? I believe the Town of Claremont should be very wary of these proposals and another question which causes me to object to this is the matter of this being a residential zone and yet this is a proposed commercial development? Is there provision for re-zoning this property to facilitate such a development? I would imagine this property is zoned residential for this very reason.</p> <p>Finally, there are other factors which will result in a negative outcome for the environment surrounding this proposed development should it be allowed to go ahead. Namely, a major increases in noise levels, pollution, congestion and a reduction in the value of the surrounding residential properties.</p> <p>For all the reasons listed above, we strongly object to this development being approved and would appreciate a thorough and timely consultation process to ensue as a result.</p>	
<p>82. Address not given I support the application for the Proposed Child Care Centre. I believe the development will be an added benefit to the community.</p>	<p>Noted, see above.</p>
<p>83. 1 Butler Avenue, Swanbourne We are writing to respond to the revised proposal for the proposed child care centre. The revised plans are not acceptable as they do not address a key issue relating to the location of the driveway (crossover) on Alfred road.</p>	<p>Noted, see above.</p>

<p>Specifically, the plans are in contravention of Australian Standards for a commercial development on this site. At great expense the local residents of Butler Avenue have been forced to engage independent and unbiased traffic engineers, Cardno, as Transcore analysis is clearly lacking in a number of areas, including a failure to address the crossover issue.</p> <p>Cardno has reviewed the location of the proposed crossover in accordance with the AS2890.1 – 2004 – Off-street car parking standards. The Australian Standard calls for a minimum stopping sight distance (SSD) of 45m for a frontage speed of 50km/h road for a non-domestic driveway. The revised plans show a distance of 40m. Therefore, the sight distance for the proposed location of the crossover for the proposed development is clearly in contravention of Australian Standard AS2890.1.</p> <p>It is unfortunate that the developers have wasted everyone's time and money with a proposal that is clearly untenable at this location. Quite apart from the crossover issue it is clearly disingenuous to locate a childcare centre on a blind corner on a busy road in a residential cul-de-sac.</p>	<p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p> <p>It is noted the crossover is not in accordance with Australian Standards however this is the best location for this site.</p>
<p>84. 44 Mayfair Street, Mt Claremont</p> <p>Further to our submission dated 21st May 2019, and in response to the applicant's amended proposal, we still strongly object to the development of a Child Care Centre at 162-164 Alfred Road.</p> <p>(We note in the amended proposal that the number of children has been decreased by 25 although staff has only been decreased by 1. Perhaps the original number could be classified as an "ambit claim"!)</p> <p>Our objections as outlined in our original proposal still stands (copy attached) however, we include the following in support of our objection.</p> <p>Our main objection is two-fold:</p> <p>i) The area is zoned Residential and the proposal is a commercial-size Child Care Centre, not near any other commercial/recreational/community or education area and is situated on a high volume traffic road. And as such it</p>	<p>Noted, see above.</p> <p>It is of concern the size of the building has not been reduced and staff numbers not reduced commensurate with the reduction in the number of children.</p> <p>The land use is not considered consistent with the residential area due to its adverse impacts on current neighbourhood amenity.</p>

contravenes regulatory requirements. In short it is 'smack bang' in the middle of an established residential area. And

ii) The location of the proposed Child Care Centre is situated at a known hazardous road location with two streets (not quite aligned) entering a high volume traffic road that has merging lanes at this point and within less than 60m (approximately) of a busy intersection controlled by traffic lights.

The amended proposal does not address modelling of the Mayfair St (cul-de-sac)/Alfred Road/Butler Avenue (cul-de-sac) intersection. This is a traffic danger zone at all times and especially during peak periods and those dangers will be significantly compounded with additional traffic into and out of Butler Avenue.

The amended proposal does not adequately address the likelihood of queuing on Alfred Road with vehicles waiting to turn into the Child Care Centre. It assumes there will be no difficulty in accessing the Child Care Centre car park where practicality indicates there will be significant congestion in the car park at peak periods. Loading young children into cars is more time consuming than that of school-aged children so traffic movement within the car park will be slower than 'normal' traffic. Also, residents adjacent to the 'queue' area will be seriously impacted.

Further, the amended proposal does not address the problem associated with bus movements on Alfred Road during peak periods with a bus stop almost opposite where the new entry into the Child Care Centre is proposed.

Neither does the amended proposal address the likelihood of vehicles parking on Butler Avenue (particularly close to Alfred Road) so parents can dash in and pick up their child. The foreseeable traffic hazard for vehicles entering and leaving Butler Avenue is obvious. As well, Butler Avenue has the added problem of a cul-de-sac rather than a through road. Residents living in Butler Avenue will be seriously disadvantaged by this increased traffic flow.

The original proposal did not have local support with 107 submissions and only 5 in favour of the proposal.

It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.

The Town of Council Minutes (motion 77/19) was unanimous when it rejected the application for the original proposal, identifying areas in breach of planning recommendations and safety guidelines – not all of which have been adequately addressed in the new proposal.

The establishment of a commercial-size Child Care Centre does not fit the profile of the area and will have a significant negative lifestyle impact on surrounding neighbours and the community at large.

We are long term residents (50+ years) at 44 Mayfair Street, Mt Claremont and are very familiar with the traffic flow at the intersection of Mayfair Street, Alfred Road and Butler Avenue. Our section of Mayfair Street is a cul-de-sac, so this is our only entry and exit point.

Mayfair St and Butler Avenue do not align which makes this intersection quite hazardous. As well, Alfred Road is a main thoroughfare with considerable traffic daily. And at this particular junction in the road traffic travelling West is required to merge from two lanes to one adding to the complexity of the intersection.

Often one vehicle travelling East on Alfred Road will be waiting to turn right into Butler Avenue, while another vehicle travelling West on Alfred Road is waiting to turn right into Mayfair St creating a dangerous traffic hazard. Occasionally this will be an even greater hazard if there is a car waiting to exit either Butler Avenue or Mayfair Street.

We are surprised and anxious about the proposed development at 162-164 Alfred Road as this is right at the point that is already difficult to negotiate safely at all times, and especially at peak hours. Also, waiting on Alfred Road to turn right into Mayfair St one feels very vulnerable as traffic coming from behind is not expecting traffic to be stationary at this point. Much of this traffic has just travelled through the traffic lights at Rochdale Road – those lights are approximately only 100m from the intersection of Alfred Road, Butler Avenue and Mayfair St and frequently are expecting to accelerate.

The increased traffic and pedestrian flow from the proposed development (expected to be 300+ vehicles on week days) will make this already difficult intersection considerably more dangerous.

<p>This is a most unsuitable area to establish any commercial development and especially a childcare facility with all the resultant vehicle and pedestrian traffic and additional noise.</p>	
<p>85. 23 Swanway Crescent, Swanbourne I am a resident of Swanbourne (and a frequent user of Alfred Road), and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne- Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>The reasons for my objection are as follows:</p> <p>Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.</p> <p>The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.</p> <p>Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.</p> <p>In the new plans, all cars will need to exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons:

- o It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Ned lands- however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east- compounding the traffic nightmare that will be generated.

- o All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road)- the revised plans do not address this traffic chaos.

- o Figure 2 and calculations have no credibility as the assumptions are not real.

- o Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.

- o If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26 you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.

The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.

The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.

Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.

The plans do not align with the WAPC Planning Bulletin 72/2009. In particular-

Needs to be considered suitable from a traffic/safety point of view- it is not due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Avenue has limited visibility.

Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road).

No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac).

In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic).

Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated. Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.

In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all-looking to the east. If there was a backlog of

vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue.

The intersection directly west- Narla Road and Alfred is extremely busy and is in close proximity. Narla I Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.

Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.

The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other- someone trying to pull out of Butler Ave onto Alfred.

There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.

Adding to further congestion and safety issues- the developer Transcore report on page 5 states that "waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors." And "In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose."- there is no guarantee from the developer that this will occur and how can the Council effectively police this?

The developer makes an unsubstantiated claim on page 8 that" As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from

<p>afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.</p> <p>The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required- why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.</p> <p>The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.</p> <p>I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.</p>	
<p>86. 40A Strickland Street, Mt Claremont We have some serious concerns as listed below.</p> <p>Duplication of services: Whilst the applicant is making a commercial decision for a Day Care Center, (let's face it, this is not a community service) it could be strongly suggested that the area already has an oversupply of Day Care Centers including Jelly Beans (Swanbourne), One Tree (Swanbourne), Annie's Play-school (Mt Claremont), Tiff's House (Swanbourne), Tiny Beez (Alfred road, Claremont) Camp Australia (Swanbourne Primary), Smart Start (Swanbourne), Jellybeans (Mt Claremont), Challenge Stadium Daycare, along with Pre-kindy at Scotch College, Pre kindy at Chistchurch Grammar and an Early Learning Center at MLC (6 months to 4 years) just to mention a few.</p> <p>Thank you again for the opportunity to comment on the proposal and hopefully contribute to a positive outcome for the community and not just one developer.</p>	<p>Noted. See above, applicant has not provided detailed information on the need for the service which is inconsistent with the requirements of LPP 206 and recommendations of PB 72/2009</p>
<p>87. 59 Strickland Street, Mt Claremont I write to express my strong objections to this development. I drive past this site everyday in the morning and afternoon and am concerned about the impact of the traffic generated from the child care centre would have on traffic and pedestrians in the area. It is a dangerous intersection, particularly in the</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous</p>

<p>morning when eastbound traffic has sun in their eyes. The recent accidents involving 2 local children at the Rochdale Road intersection highlight the level of use by young children. There are many children crossing Alfred Road going either to Mount Claremont or Swanbourne Primary. I see many drivers taking risks to enter Alfred Road from Narla during peak hour so having traffic coming out of Butler will add to the risk to other drivers and pedestrians.</p> <p>This is a residential area and it is not fair on the neighbouring properties to rezone these properties.</p>	<p>section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>
<p>88. Address not given I am a resident of the area and I support the application for the Proposed Child Care Centre. I do not believe that there is any danger associated with the childcare centre. There are many childcare centres that function perfectly well on much busier roads without any issues. There are multiple along Stirling Highway, for example.</p> <p>I myself have a young family and found it very difficult to find childcare centres without long waiting lists. This can have a huge effect on families, particularly those with either one parent or with two working parents. In addition, children's development and socialisation is extremely important at this age. I can't see how any negative will come from this development, only a positive effect on the community and their young children.</p>	<p>Noted, see above.</p>
<p>89. 11 Butler Avenue, Swanbourne I am a resident of Butler Avenue and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne-Proposed Child Care Centre.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity. Due to the scale of impact that this development would have- a number of residents have donated to get an impact assessment of this proposal. We have engaged Card no, a leading traffic safety and engineering company to do this assessment.</p> <p>We provide their report, for your information and re-purpose. Please help us stop this development.</p>	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

<p>The reasons for my objection are as follows:</p> <p>This proposed development will exacerbate the safety issues at this intersection.</p> <p>Based on the Cardno SIDRA assessment, queues are expected to extend beyond the Butler Avenue intersection from the Rochdale Road intersection. The queues on Alfred Road would impact vehicles turning right into and out of Butler Avenue and will also impact the traffic operations of Alfred Road and the intersection of Butler Avenue and Mayfair Street. I draw your attention to the image provided in their report which proves the impact on Alfred Road in peak hour. This image alone should provide sufficient evident for any person in authority to decline this unsafe development.</p> <p>Based on the expected volume of turning traffic at the Alfred Road/Butler Avenue intersection, the intersection warrants indicate a channelized right turn (CHR)/auxiliary right turn (AUR) treatment and basic auxiliary left turn (AUL) treatment should be provided at this intersection.</p> <p>The provision of a left in only access along Alfred Road is undesirable based on the WAPC and MRWA guidelines given the high traffic volumes along Alfred Street and safety concerns and visibility issues associated with the proposed site.</p> <p>Based on the revised drawings, the proposed crossover is located 40m from the Alfred Road intersection. Therefore, the sight distance for the proposed location of the crossover for the proposed development is inadequate in accordance to AS2890.1.</p> <p>Cardno believes that the proposed development on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont will have a detrimental impact on the safety and traffic operations on Alfred Road and its intersection with Butler Avenue.</p>	<p>The information contained in the Cardno TIS has been duly considered and its conclusions taken into account in assessing the proposed development. The report demonstrates there will be increased queuing and subsequent safety risks which will negatively impact on the residential amenity of the neighbourhood.</p> <p>In the event development is approved, it would be appropriate at a minimum to implement Cardno's and the Town's recommendations to include a condition the application be required to improve the road design by constructing a median splitter island at the Butler Avenue and Alfred Road intersection to improve safety conditions by reducing ability for vehicles to cut the corner and provide a pedestrian refuge. A median island on Alfred Road is also recommended to prevent illegal turns into the Alfred Road crossover and access from the west. The independent Traffic Impact Assessment submitted by Cardo recommends a channelized right turn lane at the Butler Avenue intersection and basic auxiliary left turn treatment from the east, however Turning pockets and deceleration lanes cannot be installed at this location due to existing constraints of the proximity of the Mayfair Street and the lack of sightlines from Butler Avenue.</p>
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<p>The integrity of the Transcore modelling needs to be questioned. See 5.1 of the Cardno report.</p> <p>In addition, one must question why the applicant, while reducing the number of children to attend this childcare centre, has increased the size of the centre since the original submission and now exceeds the recommended area per child by 110 sqm. Logic would imply that this developer is planning to get initial approval and then seek ways to increase enrolment capacity through a much easier process.</p> <p>I ask that the Council strongly reject this application and provide a compelling case to SAT to also reject this inappropriate application.</p>	
<p>90. 4 Butler Avenue, Swanbourne Safety and Risk Management This is a residential area, and Butler Avenue is a quiet cul-de-sac with 17 houses. The street has a footpath only for approx. 60m, after which pedestrians walk on the road to access the bushland, Lake Claremont reserve and mixed-use paths at the closed end of the cul-de-sac. This includes school children walking to and from nearby Swanbourne Primary School. The additional traffic associated with a commercial development with 65 children and 12 staff would create not only unacceptable increases in traffic in comparison to the existing low residential movements, but importantly would introduce serious safety risks for residents, local community and primary school children utilising the street as they currently do.</p> <p>As an experienced safety and health professional Zane has previously provided risk assessment details regarding the intersection of Butler Ave and Alfred Rd where the risk of a serious permanent disabling injury or death was identified as a high likelihood. The reduction in numbers of vehicles with the recent changes does indeed reduce this likelihood, however the assessment remains that there is an unacceptably high risk of a serious injury or death as a result of a vehicle/pedestrian impact due to:</p> <ul style="list-style-type: none"> • pedestrians crossing Butler Ave along the footpath of Alfred Rd; • pedestrians crossing Alfred Rd from North to South, including school children; and 	<p>Noted, see above.</p> <p>It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p> <p>As discussed in the report is likely that longer delays may increase the occurrence of drivers taking dangerous risks, also parking in Mayfair Street and subsequent pedestrians (including small children) crossing Alfred Road to the Centre, adding again to the existing safety concerns. This is evidenced by recent accidents involving school children in the area.</p>

- pedestrians walking up or down Butler Ave, in particular this risk is exacerbated by the steep blind crest and lack of footpath.

To support these concerns, recently taken footage along Alfred Rd during morning peak traffic (see YouTube: https://youtu.be/Pt3_D_bzIT8) demonstrates:

- school children riding bicycles and walking behind cars on Butler Ave as they wait to turn into Alfred Rd traffic;
- cars driving up onto the footpath on Alfred Rd heading East to go around backed up traffic behind a car waiting to turn right into Butler Ave;
- cars travelling West along Alfred Rd veering into the opening of Butler Ave to go around cars backed up behind a car turning right into Mayfair St.

Furthermore, Butler Ave has already seen a rear end collision resulting from a car driving over the blind crest colliding with a parked car on the side of the road. This was unreported hence no record exists however residents in the street involved in the incident attest to the accuracy of this.

During recent months there have been two children struck by cars at the Rochdale Rd / Alfred Rd intersection. One boy who was crossing on the green pedestrian light was thrown onto the windscreen of a car, and another boy on his bicycle was struck by a car on Myera St next to the Alfred Rd lights.

There can be no doubt that section of road is already hazardous. An increase in traffic, particularly vehicles turning across traffic to enter and come out of a cul-de-sac with no other entry or exit will only exacerbate the problem and increase the risk to safety.

WAPC bulletin 72/2009 clearly states:

A child care centre would generally not be suitable where: S3.3. j) Access from a major road or in close proximity to a major intersection where there may be safety concerns.

This location has both. The most recent plans include an additional access from Alfred Rd, therefore in contradiction to the WAPC requirements, and given Butler Ave is a cul-de-sac the only other entry on Butler Ave is still via Alfred Rd.

Further, WAPC 72/2009 S3.6 states (it)...should only be approved if it can be demonstrated that it will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users.

The above points and the YouTube video provided at https://youtu.be/Pt3_D_bziT8 clearly demonstrate this requirement cannot be met, and that this development would create a risk for children and families using the centre and increase the risk for pedestrians and road users.

Human Performance Implications

During presentations to MWJDAP and SAT, Zane has highlighted the implications of Human Performance on the existing safety concerns for Butler Ave and at the intersection of Butler Ave and Alfred Rd. These appear to have been ignored by the applicant in the recent revised proposal, so we feel it prudent to recap the issues here should personnel be reading this who were not privy to previous statements. Further detail to explain Human Performance is located at Annex A in this document.

Within the field of Human Performance there are ten (10) "Error Traps" or precursors to error. These are task related characteristics that increase the probability for error during a specific action. Given the location of the proposed child care centre and the activities involved for people travelling to and from (dropping children off or picking up), there are six error traps for drivers or pedestrians that may be present at any given time

- Stress
- Multi-tasking / high workload
- Time pressure
- Overconfidence
- Distractions

It is considered the nature of the land use (involving young children, busy parents) combined with the traffic and human performance implications could potentially result in further safety issues arising if the development is approved, causing significant impact on the amenity of the surrounding residents.

- The end of a work shift or an extended shift

The proposed childcare centre at the corner of Butler Avenue and Alfred Road in Swanbourne risks creating a number of opportunities where there may be significant risk to pedestrians and vehicle occupants.

An examination of these situations using Human Performance principles highlights these concerns and the potential increased risk to life.

Situation 1 – Vehicle turning from Butler Ave into traffic on Alfred Rd

Potential Error Traps:

- Stress (anxious child not wanting to be left; stressful morning getting child ready as well as family / self)
- Multi-tasking / high workload (planning the day; mentally preparing for meetings/daily activities; debriefing the day with child; mentally planning evening meal/schedule)
- Time pressure (running late to work/daily activities; hurry to get home at end of the day)
- Overconfidence (used to driving; never had anything go wrong at this intersection before)
- Distractions (child or children talking/yelling; heavy stream of traffic flowing in both directions; school children crossing Butler Ave and/or Alfred Rd in either East or West direction; fast moving vehicles trying to make it through the controlled intersection at Rochdale/Alfred Rd)
- End of a work shift/extended shift (night shift workers / picking up after long day shift; parents with young children who wake frequently throughout the night)

In addition to Human Performance error traps in this situation is an increased risk due to the position of the sun being in a drivers eyes at certain times of the year whilst turning right (East) onto Alfred Rd early in the morning, and

left (West) at sunset. As an example, at certain times of the year we commonly have to open the window and shield our eyes to see properly whilst turning onto Alfred Rd from Butler Ave.

Situation 2 – Vehicle driving South down Butler Ave to turn around at the cul de sac at the bottom of the hill

Potential Error Traps:

These would be very similar to Situation 1, with the addition of:

- Stress (or frustration, required to drive down Butler Ave to turn around)
- Time pressure (exacerbated due to the extra time required to turn around at the base of the hill on Butler Ave)
- Combined with the added risk of the blind crest on the hill

For both these situations the driver would be operating in either Rule Based or Knowledge mode. This has an associated error rate of between 1:2 - 1:100. The driver is typically driving based on habit (skills based) which is non-thinking, however in these situations they are also reliant on knowledge which they do not have available upon which to make a decision as to what action they will take.

A driver turning into Alfred Rd from Butler Ave does not know about vehicles coming in their direction from the controlled intersection at Rochdale Rd until the vehicle is approx. 40m away. This provides approximately 2 seconds for the driver to decide whether they will accelerate to turn in front of the vehicle or wait for a longer break in traffic (it is worth noting, this is the absolute minimum time allowed by Main Roads WA versus the recommended minimum of 2.5 seconds). Nor do they know what action pedestrians are going to take crossing Butler Ave or Alfred Rd, and it is common for pedestrians to make sudden decision to dash across slim gaps in traffic.

In Situation 2 the driver is approaching a blind hill with no knowledge of what is over the crest, which on a street with no sidewalk for pedestrians, and frequent use of the road for school children and local residents/community members poses a significant risk as they often having to move into the middle

Noted, see above.

of the road to go around parked cars (which would also be increased with the child care centre).

The residents of Butler Ave have existing knowledge of these risks and already cautiously manage them on a daily basis. With the significant increase in traffic from the proposed child care centre, the likelihood of an error being made is increased and dramatically increases the risk of a serious accident occurring.

Noise Management and Child Supervision Policy The applicants have provided a "Noise Management and Child Supervision Policy". This Policy and Plan is poorly written with a multitude of errors and incorrect information. It also has contradicting statements, in particular a statement that says the philosophy of the Centre is 'free flow' with respect to outdoor play for children attending the centre, yet it then restricts set hours per day when children will be allowed outdoors. A maximum of 3 hours per day has been allocated for children to be outdoors participating in 'free play'. Restricting outdoor play is in conflict to current recommended practice for early childhood development and not in the best interest of any child attending the Centre. When outdoors, children will have to follow strict conditions under which they are allowed to play and the Policy states that staff will be placed at 'supervision' points to keep children away from the boundary fences and from making noise. Apart from being an absurd practice for any child care centre, it is also unrealistic that 1) you can stop children making noise, banging items to make music and from being children and playing loudly, and 2) having dedicated staff to be in supervision points is also unrealistic as we know as soon as a child needs assistance, to go to the toilet or needs changing then that staff member is out of action. The fact that a Child Care Centre needs this type of Policy and Plan suggests it will be a sad and depressing place for any child attending the Centre and all due to it being built in the WRONG location. Additionally, how long will this 'Policy & Plan' actually remain effective and how it is to be policed? It is more than likely that the 'Policy and Plan' has been drafted in order to minimise "impulsive" noise characteristics in the outside play areas for the purpose of the Environmental Acoustic Assessment so as to achieve approval, and the Policy will subsequently be amended, removed, ignored or simply impossible for staff to abide by upon opening or over time. As immediate neighbours, it will then be upon us and other nearby residents to repeatedly complain, however by that stage the problem already exists and will be impossible to rectify.

Noted, see above.

<p>Rather than the applicant identifying a suitable location that optimises the development of children, this Policy and Plan significantly compromises normal childhood activity and will negatively impact their development because of restrictions due to the location in a quiet residential area. This all further supports the community view that the proposed Centre should not be built in this residentially zoned area.</p> <p>Impact on Family and Residents As we have previously stated in regard to this development, we deliberately chose to live in a location that was zoned residential, with low traffic volumes, quiet, and safe for our children to play outside and walk down the street to the nearby bush, lake and school, as many other local children and residents do. Should it go ahead, this development will have a significantly detrimental impact on our quality of life as the existing enjoyable, residential amenity will be dramatically impacted.</p> <p>We acknowledge that in the revised plans, the applicants have taken steps to reduce the noise disturbance on my property. It is noted however that there still exists a child play area immediately adjacent to the Eastern boundary, placing it alongside the property at 160 Alfred Rd. This is non-compliant with local planning requirements which prohibit play areas being adjacent to neighbouring properties and I can only assume will have a detrimental impact on anyone living there.</p> <p>Further to the above, the original proposal was for 90 children. This revised proposal allows for a far greater area per child than is required. Whilst this may be altruistic in nature, it is highly likely that the application is made for the purpose of gaining approval under the proposed conditions then making subsequent increases in children and staff once the centre is in operation. As there are no requirements for approval for such changes, there will be little to prevent this occurring.</p> <p>For the above reasons, we ask you to please reject the application for this child care centre.</p>	
<p>91. 145 Alfred Road, Mt Claremont As a resident in Mount Claremont on Alfred Road I am concerned of the implications that the proposed commercial development at 162-164 Alfred</p>	<p>Noted, see above. It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an</p>

<p>Road will have to the area and the local community. My primary concerns are;</p> <ul style="list-style-type: none"> • A large scale commercial development in a residential area which has the capacity for 90 children and 13 staff members and the implications this will have on noise level in the local area. • The increased traffic will have an impact on the already congested local traffic during peak hours along Alfred Road. This will also pose a significant hazard to children walking or riding their bikes to and from school. I myself have two children who attend Mount Claremont primary school and I am already concerned of the increased number of cars along Alfred Road during these times. I understand that a traffic assessment has been done by the developer, however I question whether this is biased and a full traffic assessment needs to be conducted by an external source to give a valid indication of the ramifications. • On a more personal note my son was knocked down by a car this year in early August while crossing at the traffic lights. Luckily he was ok and made a full recovery but he did spend 3 days at PCH with a severe concussion and wounds on his elbow, hip and knee. This is every parents nightmare and I only suspect that with a daycare of this size the increased traffic along Alfred road is my biggest concern. • The lack of available parking for carers dropping and picking up 90 children during peak hours will be a serious issue in regards to safety and cars parking along Alfred Road and the nearby side streets. • Finally, there are already a number of daycares in the area which service the local families and these daycare are not at capacity. These daycares/ early learning centres include Annie's on Strickland Street, Montessori Mulberry tree at HBF stadium, Jellybeans in Swanbourne, and Bumblebee at the opposite end of Alfred road. <p>Based on the information I have accessed online and from local neighbours I strongly object to this development on the grounds of safety, traffic, and residential impact.</p>	<p>already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>
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<p>This application received the most objections of any development in the last decade in July 2019. The Town of Claremont has already said NO. The state panel said NO and now they have appealed to the Tribunal. Why is this developer bypassing government, our representatives and the community? Please take a stand supporting the community and say NO to this development.</p>	
<p>92. Strickland Street, Mt Claremont I am writing in support of the proposed child care centre.</p> <p>I believe this will be a great benefit to the community, and it gets my full support.</p>	<p>Noted, see above.</p>
<p>93. Mt Claremont I have just found out about the proposed development of a child care facility at 162-164 Alfred Road, Swanbourne.</p> <p>Apparently this will be a childcare facility for 65 children and staff.</p> <p>It has been my observation that Alfred Road is very busy particularly at school drop off/collection times, due to traffic coming off/joining West Coast Highway, making their way to/from the schools in the area (primarily Mt Claremont Primary and Swanbourne Primary). This is exacerbated by those living locally, using the road at the same time to either take children to/from school, plus making their way to other parts of the suburbs or to the train station at Claremont. Of course, during the morning and evening, traffic increases, as commuters make their way to/from employment.</p> <p>Surely the increase in vehicle numbers caused by the proposed childcare facility, will only exacerbate the problem.</p> <p>Alfred Road carries a lot of traffic already, the amount having increased since the building of the apartments in and around the old Swanbourne High School site. The roads here carry a lot of heavy traffic, due to the increased building for instance, the apartments being built around the Claremont train station.</p> <p>Please have a care for those living in this area and using an already busy road.</p>	<p>Noted, see above. It is considered the TIS has not adequately addressed safety concerns, it is likely that an increase in traffic could exacerbate an already dangerous section of road due to driver behaviour and additional (unexperienced children) pedestrians or cyclists. Site specific issues have not been addressed and safety has not been adequately analysed. The likely adverse impacts on residential amenity have not been adequately mitigated by the reduction of children numbers and redesign of the building.</p>

<p>We need to keep the roads safe, and building the above facility, will make this more difficult.</p>	
<p>94. 160 Alfred Road, Claremont</p> <p>I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre that is currently in mediation at the State Administrative Tribunal.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area, which will have a drastic, negative impact on Alfred Road and its safety. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>In my case as the next door neighbor, the cars driving out from the two proposed new homes on 160 Alfred Rd will face higher risk to turn right to east direction onto Alfred Rd with the higher volume of the traffic with this child care centre especially during the peak hour. With the second version of design, the main car entrance this proposed child care centre is from Alfred Rd, which also make the access to Alfred Road turning left more dangerous and difficult during the peak hour.</p> <p>In addition, the current two-level building design is worse than before and our privacy is at risk with the overlooking windows above. Because of the easement design of our future building design, we have to leave enough space in front of the house, north of the land adjacent to Alfred Road and make the main house site to the south end, which has to be now side by side to the proposed main building of the child care center.</p> <p>As proposed outdoor uncovered playgrounds of the child care center are now designed directly next (not like to the south boundary there is a wide distance to the south side neighbor and the outdoor play area is covered) to lot 1 (160A Alfred Rd) the new home site, the future</p>	<p>Noted, see above. As the adjoining landowner this property is impacted by the proximity of outdoor play areas to the east, and future residential development on the site may be negatively impacted.</p>

family can't enjoy quiet lives from 6.30am to 6pm due to the obvious noise problem, which is impossible to deny even with the icy cold data analysis. The proposed outdoor playground area at the east side actually covers the main area of future residential living (side by side actually), which means the future family will have to suffer the noise if the child care center starts running considering its size of more than 65 kids or even more because they have more than enough internal space. We are normal human beings and have the right to live in peace, not fighting everyday with the noise problem which can be prevented from the beginning and the innocent children shouldn't bear any potential anger or hatred relying on the tolerance of the future neighbors. As proud Australian citizens, we should be keen to build up our community in harmony and try our best to avoid any potential conflict or dispute.

As a fact, a play area immediately adjacent to my property is non-compliant with state planning guidelines WAPC Planning Bulletin 72/2009 which states play areas shall not be adjacent to neighboring properties.

The other reasons for my objection are as follows:

Ø Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.

Ø The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.

Ø Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will

be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.

Ø In the new plans, all cars will need to enter via Alfred Road and exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.

Ø The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons

- o It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Nedlands – however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east – compounding the traffic nightmare that will be generated.

- o All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road) – the revised plans do not address this traffic chaos.

- o Figure 2 and calculations have no credibility as the assumptions are not real.

- o Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi

to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.

o If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26....you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.

Ø The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.

Ø The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.

Ø Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.

Ø The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –

Ø Needs to be considered suitable from a traffic/safety point of view – it is not due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Avenue has limited visibility

Ø Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns

or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road)

Ø No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)

Ø In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic)

Ø Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

Ø Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.

Ø Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.

Ø In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.
Ø If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue

Ø The intersection directly west – Narla Road and Alfred is extremely busy and is in close proximity. Narla / Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.

Ø Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.

Ø The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred.

Ø There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.

Ø Adding to further congestion and safety issues - the developer Transcore report on page 5 states that "waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors." And "In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose." – there is no guarantee from the developer that this will occur and how can the Council effectively police this?

Ø The developer makes an unsubstantiated claim on page 8 that "As with similar centres, an overwhelming majority of patrons would

originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.

Ø The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required – why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

In this case of 100 kids transportation every day in the future rather than 65, in peak hour, getting onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 322 cars per day (161 in / 161 out) will have significant impact on the surrounding neighbourhood (300% + increase in traffic) and amenities

<p>Ø The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.</p> <p>As a conclusion, I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	
<p>95. 160 Alfred Road, Claremont</p> <p>I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre that is currently in mediation at the State Administrative Tribunal.</p> <p>This application is for a large scale, commercial childcare centre located in a residential area, which will have a drastic, negative impact on Alfred Road and its safety. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.</p> <p>In my case as the next door neighbor, the cars driving out from the two proposed new homes on 160 Alfred Rd will face higher risk to turn right to east direction onto Alfred Rd with the higher volume of the traffic with this child care centre especially during the peak hour. With the second version of design, the main car entrance this proposed child care centre is from Alfred Rd, which also make the access to Alfred Road turning left more dangerous and difficult during the peak hour.</p> <p>In addition, the current two-level building design is worse than before and our privacy is at risk with the overlooking windows above. Because of the easement design of our future building design, we have to leave enough space in front of the house, north of the land adjacent to Alfred Road and make the main house site to the south end, which has to be now side by side to the proposed main building of the child care center.</p>	<p>Noted, see above</p>

As proposed outdoor uncovered playgrounds of the child care center are now designed directly next (not like to the south boundary there is a wide distance to the south side neighbor and the outdoor play area is covered) to lot 1 (160A Alfred Rd) the new home site, the future family can't enjoy quiet lives from 6.30am to 6pm due to the obvious noise problem, which is impossible to deny even with the icy cold data analysis. The proposed outdoor playground area at the east side actually covers the main area of future residential living (side by side actually), which means the future family will have to suffer the noise if the child care center starts running considering its size of more than 65 kids or even more because they have more than enough internal space. We are normal human beings and have the right to live in peace, not fighting everyday with the noise problem which can be prevented from the beginning and the innocent children shouldn't bear any potential anger or hatred relying on the tolerance of the future neighbors. As proud Australian citizens, we should be keen to build up our community in harmony and try our best to avoid any potential conflict or dispute.

As a fact, a play area immediately adjacent to my property is non-compliant with state planning guidelines WAPC Planning Bulletin 72/2009 which states play areas shall not be adjacent to neighboring properties.

The other reasons for my objection are as follows:

Ø Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.

Ø The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have

been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.

Ø Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.

Ø In the new plans, all cars will need to enter via Alfred Road and exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.

Ø The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons

- o It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Nedlands – however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east – compounding the traffic nightmare that will be generated.

- o All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road) – the revised plans do not address this traffic chaos.

- o Figure 2 and calculations have no credibility as the assumptions are not real.

o Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.

o If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26....you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.

Ø The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.

Ø The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.

Ø Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.

Ø The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –

Ø Needs to be considered suitable from a traffic/safety point of view – it is not due to blind spot for westbound traffic (together with

merging), 4 intersections in close proximity, Butler Avenue has limited visibility

Ø Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road)

Ø No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)

Ø In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic)

Ø Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

Ø Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.

Ø Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.

Ø In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.

Ø If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue

Ø The intersection directly west – Narla Road and Alfred is extremely busy and is in close proximity. Narla / Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.

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Ø There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.

Ø Adding to further congestion and safety issues - the developer Transcore report on page 5 states that "waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors." And "In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside

peak operating times so that parking bays are available for this purpose.” – there is no guarantee from the developer that this will occur and how can the Council effectively police this?

Ø The developer makes an unsubstantiated claim on page 8 that “As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar”. The community is already well serviced with more childcare centres than are required. None of the local centres are full.

Ø The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required – why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
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TOTAL	65		329.03	211.25	117.78	100

In this case of 100 kids transportation every day in the future rather than 65, in peak hour, getting onto Alfred Road is difficult due to high

<p>volumes of traffic. The impact of additional 322 cars per day (161 in / 161 out) will have significant impact on the surrounding neighbourhood (300% + increase in traffic) and amenities</p> <p>Ø The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.</p> <p>As a conclusion, I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.</p>	
<p>96. Butler Avenue, Swanbourne Hello, it should be noted formally that I am in objection to the proposed development at 162-164 Alfred road that has been rejected by the TOC and JDAP (1st round) and now being appealed by developers via SAT.</p> <p>If you are interested in the technical reasons why I am in objection, please contact\ refer to the submission 52.</p> <p>If you are interested in the safety reasons why I am in objection, please contact \ refer to the submission 89.</p> <p>If you are interested in the impact as to why I am in objection, please contact \ refer to the submission 90.</p> <p>If you are interested in my personal plea as to why our electorate should get involved in stopping this development once in for all please see below.</p> <p>The community in general is not in objection to development. We as a community are in objection to this specific development being undertaken at this location by the developer. The purpose of the circumvention of existing planning laws is a balancing act between</p>	<p>Noted, see above.</p> <p>Noted, see above.</p> <p>Noted, see above.</p> <p>Noted, see above.</p> <p>Noted, see above. It is considered the revised proposal does not adequately address location and safety issues which are likely to have a detrimental impact on the current residential amenity.</p>

<p>that where the benefit of such development outweighs the impact to the community beyond a reasonable doubt". The original and now subsequent proposals have only shown their true colours that their intent to develop on this block is for the purpose of commercial benefit and not that of a commercial venture which benefit will outweigh the impact to the community. All that is been provided by the developer is circumstantial evidence around demand for a childcare centre and a bias account of its impact on the surrounding community (specifically around the impact and safety risk of the imposing traffic of the area). When given the opportunity to resubmit, the developers only made two changes post a mediation hearing via SAT 1) an entrance onto Alfred road which does not comply with Main Road Standards given the intersection, and 2) have reduced the number of kids but had increased the square footage available for use. Based on this I am concerned that the developers have made no effort to amend the proposal in the best interest of the community and will continue to pursue something until they get what they want – without consideration of the impact it will have on the community. The existing proposed development does not merit special consideration for the existing planning laws to be circumvented and should be rejected in full (as is) with no further avenue for resubmission.</p>	
<p>97. 40 Strickland Street, Mt Claremont Please stop the Dangerous Development of the Child Care Centre on the corner of Alfred Road and Strickland Street.</p> <p>Alfred Road is busy already and Strickland is becoming busy with people bypassing Rochdale if the lights change – so they can save a few minutes of time stopping at the lights.</p> <p>It is often already difficult to exit and enter Strickland Street from Alfred Road – having this Child care centre there will only increase the traffic hazard especially being so close to the lights.</p> <p>I feel it is wrong to have a child care centre so close to a set of traffic lights which will hold up the already busy traffic flow.</p>	<p>Noted, see above.</p>
<p>98. 165 Rochdale Road, Mt Claremont</p>	<p>Noted, see above.</p>

<p>I wish to make a firm no to the plans for the proposed building of a day care centre on the properties 162-164 Alfred road Mt Claremont.</p> <p>It is a very dangerous intersection and there are blind corners with no parking for the pick up and drop off of children. It would not be safe.</p> <p>I live very close to the intersection of Rochdale and Alfred Roads and even I have problems coming onto Rochdale road.</p> <p>I would think the extra traffic and small children would be high risk for all concerned.</p>	
<p>99. Finch Way, Mt Claremont</p> <p>I live in Finch Way Mt Claremont therefore Alfred Road is my access to points south, east and west.</p> <p>I do think that if this development goes ahead there needs to be major roadworks done providing access to and from the premises.</p> <p>Feeder lanes from both east and west would facilitate access and egress. At present traffic banks up if a vehicle travelling west wishes to turn right into Mayfair causing frustration as traffic must come to a halt whilst waiting for east bound traffic to ease. In peak hours this can cause a bottleneck for traffic travelling west.</p> <p>With the added comings and goings from the proposed development the current conditions would be problematic on a main thoroughfare.</p>	<p>Noted, see above. Should the JDAP support the proposal a condition is recommended for appropriate road upgrades.</p>
<p>100. Address not given</p> <p>I am a resident of the area and I support the application for the Proposed Child Care Centre.</p> <p>I believe the development will be an added benefit to the community.</p> <p>I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.</p> <p>I do not believe there will be any negative effects of such a development.</p>	<p>Noted, see above.</p>

<p>I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves, they are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development.</p> <p>Research has shown that children who attend childcare centres from an early age development better social skills. Therefore, the more childcare centres the better, I vote YES for this development.</p>	
<p>101. Address not given I am a resident of the area and I support the application for the Proposed Child Care Centre.</p> <ul style="list-style-type: none"> I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves, they are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age development better social skills. Therefore, the more childcare centres the better, I vote YES for this development. 	<p>Noted, see above.</p>
<p>Late Submission 102. 136a & b Alfred Road We are residents of Claremont, and we are writing to express our support for the application of the development for 162 & 164 Alfred Road, Swanbourne – the proposed childcare centre.</p> <p>We understand that this application is for the benefit of the local community and whole hearted support its approval.</p> <p>We, as rate payers, ask the council to also fully support this development.</p>	<p>Noted, see above.</p>

Debbie Hill

From: Keith Grainger <keithmgrainger@gmail.com>
Sent: Friday, 22 November 2019 10:29 AM
To: Debbie Hill
Subject: HPRM: Re: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne
Importance: High

Dear Ms Hill, thank you for the email.

My comments on the need to reject the Child Care Center application still apply despite any planning changes.
Keith and Jan Grainger.
54 Mayfaif st Mt Claremount.

> On 22 Nov 2019, at 10:13 am, Debbie Hill <dhill@claremont.wa.gov.au> wrote:
>
> <TOC ad letter - 162 & 164 Alfred Road.pdf>

From: Geoff Vine <vinegeoff@hotmail.com>
Sent: Friday, 22 November 2019 1:30 PM
To: Debbie Hill; Town of Claremont; Minister.Saffioti@dpc.wa.gov.au
Subject: Re: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne

Dear Administrators ,

I refer to the recently published plans and the very short time allowed for those affected, by the large scale commercial development, to comment .

I comment below as a local resident who really, sincerely wishes to see negative impacts solely for developer commercial profit, such as this, stopped when the impact on the residents is so large. There is NO residential benefit here for those people living nearby.

It will make their lives a complete misery . Just not fair . Labour governments are supposed to be caring for the established community, thereby not allowing it to be destroyed .

- 1.It is NOT reasonable to negatively impact an established residential area.
2. The scale is too large with inadequate parking/access provision .
3. On street parking is assumed . Why should people have all those vehicles outside their homes all day and every day?
4. Service vehicles are to be small scale . How can you police that and insist on it when operating the centre. Clearly large vehicles will be give a major impact daily
5. No off-street space for deliveries or vehicle turning.
6. Emergency access insufficient
- 7.Exit and entrances too narrow for the types of vehicle that will need access. Access queues will occur and the number of vehicles arriving and leaving have been very much under estimated to suit the developer.
- 8 Major under estimate of the number and type of vehicles accessing the site each day.
- 9.Playgrounds will generate major noise levels close to existing boundary houses to an intolerable level.
10. This is(#9) obvious when the noise management plan calls for more outside staff to stop children doing what is natural. Such as playing , shouting , making a noise ,screaming , banging on fences , etc., The supervision controls plan clearly recognises that children will have to be controlled beyond the norm because all playgrounds are too close to existing houses and the area is too small for proper playing. In other words this centre would be in the wrong place!
11. Sound ingress monitoring was insufficient , monitoring execution having been cut short.
12. Double glazing is required for energy and noise efficiencies. Glass barriers do not work nor do brick walls.
- 13.Food cooking and waste smells will be obvious.
14. Mechanical services such as heating and cooling equipment impacts have not been assessed. Sound proofing provision must be installed
15. Visual impact is massive in that 20 cars will be visible from the street all day and everyday . Screening provision is poor.
16. Environmental impact is unacceptable for a residential area.Drainage and sewer impacts will arise.
17. Each peak hour arrival and departure period will create back ups and raise risk for accidents because the site location ,with poor access and space , is in the WRONG place.
18. The building is too high relative to the existing properties.

I request this building venture be rejected and houses in keeping with the surrounding area be allowed only.

Regards
Geoff Vine
0437641092

From: Debbie Hill <dhill@claremont.wa.gov.au>
Sent: 22 November 2019 10:13
To: Debbie Hill <dhill@claremont.wa.gov.au>
Subject: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne

Good morning

Please refer to the attached letter regarding the development application for a proposed child care centre at 162 & 164 Alfred Road, Swanbourne. You have been sent this email as you previously made a submission on the application.

Should you wish to view electronically the amended plans and documents referenced in the letter, please reply to this email agreeing to the below Terms of Use. I will then send you a link enabling you to access the files online.

Terms of Use – Electronic Viewing of Plans

The plans provided by the Town for this proposal are for the purposes of consultation only and must not be published, reproduced or copied in any manner, except with the express permission of the Town.

Should you have any queries regarding the above, please do not hesitate to contact me.

Kind regards

Debbie Hill
Administration Officer Planning & Development
Town of Claremont

Number One Claremont
308 Stirling Highway, Claremont
PO Box 54, Claremont WA 6910
ph +61 8 9285 4300
www.claremont.wa.gov.au



Let's Light Up Christmas
Thursday 21 November, 5pm to 8pm
The Square/Claremont Quarter

Claremont Christmas Festival
Sunday 1 December, 4pm to 8.30pm
Claremont Park

Buon Natale
An Italian themed Christmas street celebration
Thursday 5 December, 5pm to 9pm
Bay View Terrace

Find out more at
claremont.wa.gov.au | claremonttowncentre



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This email is private and confidential. If you are not the intended recipient, please advise us by return email immediately, and delete the

From: Banfield, Amber (Perth) <Amber.Banfield@worley.com>
Sent: Friday, 22 November 2019 11:18 AM
To: Town of Claremont
Subject: Planning and Development - 162 & 164 Alfred Road, Swanbourne
Categories: Ruchira

To whom it may concern,

Re: Submission opposing the proposed childcare development on 162 & 164 Alfred Road, Swanbourne.

We are nearby residents of 162 & 164 Alfred Road, Swanbourne, owners of 31 Mayfair St, Mount Claremont.

We strongly oppose the application for a childcare facility on this site for the following reasons:

1. During peak traffic conditions (7.30 to 9.30pm and 3-6pm), including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility will not only increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school. It is for that very reason, the City of Nedlands established cross walking lights at the Alfred and Rochdale intersection in recognition of the congestion and improve the safety of pedestrians/bike riders.
2. The families attending the proposed day care will also be at risk due to the parking constraints.
3. I am an owner/occupier on Mayfair street and often have long wait periods before the traffic is clear to exit my street. In many cases, those clearance windows are so short, I have to really power my vehicle to exit safely. Such a development on Butler Ave will significantly enhance these issues.
4. A round-about positioned on the Narla/Alfred intersection would alleviate these issues somewhat. This road-about should be considered regardless of whether the Childcare facility is approved. It would also assist in slowing vehicle speeds travelling east down the Alfred hill.
5. Furthermore, in the afternoon, this section of road is highly dangerous when driving west due to the visual impairment created by the sun setting. I am always concerned about being rear-ended when I turn into my home on Mayfair street. Having additional cars entering and exiting Alfred road from the Child Care facility during this time significantly increases this hazard.

Thank you for your consideration,

Amber & Drew Banfield
31 Mayfair Street,
Mount Claremont
Amber.banfield@worley.com
Ph: 0407770270

From: sally skevington <sally.skevington3@hotmail.com>
Sent: Sunday, 24 November 2019 5:34 PM
To: Debbie Hill
Subject: HPRM: Re: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne

Dear Debbie I do not understand why the Council would consider allowing a large business in a residential area. If it was an application to run a dress shop of course you would say no, but it seems to be OK to run a large business with about 10 times the traffic volume of a small dress shop. The term 'children' conjures images of sweet and nice but we are talking about hundreds of cars going in and out of a centre. People do not just drop babies/children at the sidewalk. They park, take them in and settle them until the baby/child is OK.

I fully support small day care centres in suburban areas but these need to have a maximum of 20 to 25 children. Even those numbers will have an impact on the busy Alfred Road and increase traffic in what is an unsafe area anyway.

Children will die if you put a large centre on a busy street and the council will be partly responsible for not obeying its own policies.

Please reject the application to put a big business in a residential area.

sally skevington
0477323244
8 Narla Road Swanbourne WA

From: Debbie Hill <dhill@claremont.wa.gov.au>
Sent: Friday, 22 November 2019 1:13 PM
To: Debbie Hill <dhill@claremont.wa.gov.au>
Subject: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne

Good morning

Please refer to the attached letter regarding the development application for a proposed child care centre at 162 & 164 Alfred Road, Swanbourne. You have been sent this email as you previously made a submission on the application.

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Should you have any queries regarding the above, please do not hesitate to contact me.

Kind regards

From: Danielle Kidd <daniphilippe@iinet.net.au>
Sent: Saturday, 23 November 2019 9:35 AM
To: Town of Claremont
Subject: Opposition to proposed daycare on Alfred Road

Categories: Ruchira

To whom it may concern,

I am writing to object to the proposal for a Commercial Childcare Development on the site at 162 & 164 Alfred Road Swanbourne.

I have viewed the revised plans and strongly object to the proposal.

This location is zoned R20 which is a residential Zoning. When any person buys or owns property in this zoning, they are entitled to expect the area will be residential until there are zoning changes or changes to Town Planning Schemes. This area is purely residential.

Additionally during peak traffic conditions including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility with 12 staff and 65 children will not only significantly increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school.

We are owner/occupiers on Strickland Street street and have children attending Swanbourne Primary School and are very concerned as the additional traffic will increase risks to our children when riding to school.

The traffic report in the submission did not include the neighbouring intersection 65m away (Alfred/Rochdale) where 2 Swanbourne Primary Children have been hit by cars riding to school this year alone. One of these incidents was extremely serious and the second (from what I am aware) is an ongoing hit and run investigation. This intersection has traffic lights and pedestrian crossing to increase safety and these incidents have still occurred. The Butler intersection is without the safety of lights with pedestrian crossing.

The proposed childcare facility with a significant increase in traffic for the intersection will therefore be increasing the risk to children travelling to and from Swanbourne Primary and as a result I lodge my objection to these plans.

Thank you for your consideration
Danielle Kidd
22 Strickland St Mount Claremont

From: Api Gracie <apicleo@yahoo.com>
Sent: Saturday, 23 November 2019 10:33 AM
To: Town of Claremont
Subject: 162 & 164 Alfred Rd Swanbourne propose Child Care Centre

Categories: Ruchira

To whom it may concern,

I am writing to object to the proposal for a Commercial Childcare Development on the site at 162 & 164 Alfred Road Swanbourne.

I have viewed the revised plans and strongly object to the proposal.

This location is zoned R20 which is a residential Zoning. When any person buys or owns property in this zoning, they are entitled to expect the area will be residential until there are zoning changes or changes to Town Planning Schemes. This area is purely residential.

Additionally during peak traffic conditions including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility with 12 staff and 65 children will not only significantly increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school.

We are owner/occupiers on Strickland Street street and have children attending Swanbourne Primary School and are very concerned as the additional traffic will increase risks to our children when riding to school.

The traffic report in the submission did not include the neighbouring intersection 65m away (Alfred/Rochdale) where 2 Swanbourne Primary Children have been hit by cars riding to school this year alone. One of these incidents was extremely serious and the second (from what I am aware) is an ongoing hit and run investigation. This intersection has traffic lights and pedestrian crossing to increase safety and these incidents have still occurred. The Butler intersection is without the safety of lights with pedestrian crossing.

The proposed childcare facility with a significant increase in traffic for the intersection will therefore be increasing the risk to children travelling to and from Swanbourne Primary and as a result I lodge my objection to these plans.

Thank you for your consideration,
Grace.

From: Easton <drlea@msn.com.au>
Sent: Saturday, 23 November 2019 11:05 AM
To: Town of Claremont
Subject: Modified Plans childcare centre bultler

Categories: Ruchira

Thankyou for providing the link to the modified plans and the revised traffic report resulting from mediation at SAT.

I remain concerned about the traffic impact on the corner of Narla Road and Alfred Road.

It is disappointing the mediation process required an assessment on the impact of the Rochdale Road / Alfred Road intersection but not the Narla Road intersection.

The Rochdale Road intersection is controlled by traffic lights and I agree that the traffic generated by the Child care centre is unlikely to impact on this intersection.

I am unable to comment on the Bulter Avenue / Alfred Road intersection because I never make turns in or out of this street.

However, the Narla Road intersection during morning peak and afternoon peak (starting at just after 3.00pm) is very difficult.

During these times, to make a right hand turn out of Narla Road into Alfred (travelling towards the City) it is necessary to rely on the gaps in traffic created by the traffic lights at Rochdale or West Coast Highway.

It is often not possible because the gap created by lights at Rochdale coincides with a flow of traffic from the lights at West Coast and visa versa. Similarly, a car traveling from West Coast Highway may queue in the turning right lane to wait for a gap in traffic from the Rochdale lights to turn into Narla; thus preventing a turn right movement from Narla into Alfred.

There is no round-about and there are no traffic lights to assist the turn right movements out of Narla. Because of the local geography (lake Claremont) there only three intersections I can use heading north/ north-east/ east from Fern Street or the Scotch College vicinity: Alfred / West Coast; Alfred / Narla; and Alfred / Davies. Because of the geography and the location of Schools, an unusually large amount of traffic (unusual for a 50km small suburban street) uses Narla Road to turn right into Alfred including buses. As traffic has been increasing the gaps/ shadows created by the traffic lights at Rochdale and Alfred are getting less frequent and smaller especially in the peak hours.

The impact of the child care centre will be that cars travelling west from the Childcare centre during peak periods will get first use of the gaps in traffic created by the Rochdale lights. This will reduce even further the opportunities to turn right out of Narla.

Inevitably the Council will have to carry the cost of managing this intersection (a possible round-about (challenging because of the gradients?)).

At this stage, extra traffic from the Childcare Centre will have a negative impact on amenity and possibly safety. It will add a source of peak hour traffic to an intersection which is already overloaded at peak hours.

The loss of amenity is unnecessary. The child care centre is poorly located (reference state and local planning policies). It is an opportunistic proposal based on obtaining relatively cheap land. The developer's benefits from opportunity should not over ride the adverse impact on amenity. Of greater concern is the likelihood of accidents at the intersection of Narla. I have noticed an increase in risky decision making by drivers (frustrated at the amount of time in the queue at Narla Road) they turn into gaps which are not quite big enough, causing cars travelling along Alfred to brake.

Please do not ignore this intersection. It is disappointing and surprising it has not been part of the mediated outcome.

Yours Sincerely

Ross Easton
Fern Street Swanbourne.

From: Lawlorm <Lawlorm@bigpond.net.au>
Sent: Saturday, 23 November 2019 12:05 PM
To: Minister.Saffioti@dpc.wa.gov.au
Cc: Town of Claremont
Subject: Proposed childcare centre at 162&164 Alfred Road Swanbourne

Categories: Ruchira

Dear Minister,

I write to you as a concerned nearby resident who will be impacted by a proposed childcare centre at 162 & 164 Alfred Road Swanbourne, should the proponent's development application be ultimately approved.

As you may be aware, the application was rejected by the Town of Claremont earlier this year, and then subsequently by the State Panel. The developer has now submitted a revised application and has appealed to the Tribunal.

I believe that the proposed facility, catering for 65 children, is in an inappropriate location with respect to the amenity of neighboring residents, especially those living in Butler Avenue Swanbourne. Butler Avenue, which is a relatively short length cul-de-sac, would provide the primary access for the centre.

The revised application and design have not alleviated the fundamental concerns that I have with regard to the increased traffic burden that will be imposed by a facility of this scale. The location of the centre on the corner of Alfred Road and Butler Avenue, is in my view, entirely impractical. This is on the basis of the already substantial volumes of traffic passing through the intersection during week day peak periods.

Traffic and parking congestion difficulties will very likely arise in Butler Avenue during these peak periods when customers are dropping off and collecting children. Furthermore, I believe that there will exist a traffic safety hazard at the Alfred Road and Butler Avenue intersection should this development proceed and achieve its commercial target of 65 children under care. The intersection, which is close to traffic lights on Rochdale Road, is already hazardous for motorists entering and leaving Butler Avenue. I don't believe that the applicant has adequately and impartially assessed the added traffic volumes and the consequential impact.

I am not averse to redevelopment of the site, currently occupied by two houses, but would prefer to see a development that is thoroughly planned and not just an overt commercial enterprise within a residential area.

Thank you very much for receiving this correspondence, and I do hope that you may be able to see the proponent's application for what it really is, ie a hazardous and ill-conceived development in the wrong location.

Yours sincerely,

Michael Lawlor
6 Butler Avenue
Swanbourne 6010
0418 932 554

Ashley and Marlo McIntosh
59 Mayfair Street
Mount Claremont WA 6010

25th November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Mt Claremont living just up the road from the proposed childcare centre. I am writing to express my concern about this Proposed Child Care Centre and it's revised application for 162&164 Alfred Road Swanbourne.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

Excessive traffic in the area during school drop off time. It is very difficult turning right from Mayfair street now. The child care centre would make this problem worse.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Your sincerely,

Ashley and Marlo McIntosh

Debbie Hill

From: Sue Matera <home@materagroup.com>
Sent: Monday, 25 November 2019 10:54 AM
To: Town of Claremont
Subject: 162/164 Alfred Road Development

Categories: Kylie

25 November 2019

Town of Claremont
Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

To Whom It May Concern,

I am a resident on Mayfair Street in Mt Claremont and a frequent user of Alfred Road.

I have concerns about the new application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

I strongly oppose to this development on the basis of safety of pedestrians and particularly the young community around the area , the increase in thoroughfare will have a massive impact on Butler Street, Alfred Road and Mayfair Street. The safety for all involved should be of concern.

I don't feel the new application has changed to be honest other than the amount of children and staff.

I ask that the Council strongly reject this application.

Sincerely,

Susan and Phil Matera
home@materagroup.com
Or 0408092812

Sent from my iPhone

Craig & Louise Richardson
163 Alfred Road,
Mt Claremont WA 6010
richardson@inet.net.au

25 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

As an owner of an immediately affected property in Mt Claremont, we write to you to express our concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

We oppose the development based on the following concerns:

- Already adequate Childcare facilities nearby. What is the case study for this site.
- Existing residential R20 zoning and longstanding suburban setting seems to be completely at odds with commercial premises which has been initiated with no consultation with the council.
- Operating Hours of Centre in suburban setting, noting we have not yet viewed the draft Council policy on neighbourhood child care centres and specific Licensing conditions proposed for the centre.
- Grave concerns on alternative allowable uses if Child Care Centre fails.
- Grave concerns on alternative uses allowable or unauthorised uses after child care operating hours- other user groups or renting for other uses, ie band practice, exercise, hobby interest groups, family relationship or intervention/counselling groups.
- Likely hood of facility being developed and sold. Protections that bind new owners to conditions.
- Light pollution dusk to dawn if security lights burn during the night.

Noise pollution:

- Potential for early start & late finish of centre and associated noise from staff and young children.
- Parent meetings, Parties etc after operating hours.
- Children at play.
- PA music or other amplified annunciations.
- Plant and equipment attenuation and visual consideration. ie not on roof tops.

The Traffic Study does not address specific data to the area, and relies on preferential selection of reference data from elsewhere.

I can see no real consideration for the following:

- Butler avenue is no through road. No through traffic. What goes in must come out same way. Traffic jams up that street very likely.
- Traffic Lights & existing Traffic jams.
- Bus stop and the specifics of the proximity to the lights, no pull off bay , already affecting driveways, side street with Traffic jams.
- Swanbourne Primary School & Scotch college traffic.
- Peak hour traffic schools and workers.
- SAS, ARIA apartments traffic
- Population growth affect under City of Nedlands Scheme 3 Infill adding density- projections to be considered in traffic study.
- Potential for Inappropriate use of Kennedia lane to *bypass* traffic lights. More users.
- Median strip or turning bay.
- Vehicle, light & Heavy, Bicycle,
- Movement across Alfred road by Pedestrians, in front or behind buses or banked traffic. Already bad related to school.
- Banked traffic blocking driveways of 159, 161 and 163 Alfred road,

The proposed building looks lightweight and out of place in the setting specifically:

- The external form looks as if it is a multi-retail/commercial development.. With not much adjustment to the internal layout it looks as if the development could be easily repurposed as 4 or 5 commercial units.
- Unusual attributes added to the design such as roller shutters and service gates that really look like provisions for an intended alternate use.
- The long continuous external walls is very commercial, and I question its suitability for enhancing the street scape.
- The play areas look narrow, and surround the building, with no real indication of play equipment, sand pits etc etc.
- No adequate consideration for plant equipment such as external Airconditioning condensing units to be housed on plantrooms or acoustic enclosures. Locating this sort of equipment must surely be secured away from play areas, adjacent boundaries, and not be permissible on roof tops in the visual field as so often is done on low cost commercial developments.
- No added mature plantings have been shown, or anything to further conceal the intended commercial nature of the site.
- There is no notes relating to intended enhancements to streetscape.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Craig & Louise Richardson

0412249530

Debbie Hill

From: Pauline Bogle <paulineb@westnet.com.au>
Sent: Saturday, 23 November 2019 2:16 PM
To: Town of Claremont
Subject: 162/164 Alfred Road Swanbourne
Attachments: IMG_1977.jpg; ATT00001.txt

Categories: Ruchira

To whom it may concern

As owners of property in Butler Ave Swanbourne we oppose the amended plans for a child care centre at 162/164 Alfred Road Swanbourne.

The amended plans still do not address the issues of traffic and noise. The complicated traffic modelling does not address the issue of traffic entering the centre from the cul de sac of Butler Ave. It must be challenged for its accuracy.

We oppose the large scale development in a residential area.

Please find below our concerns from the original plans, as they still are relevant as the amended plans go no way to reducing any issues these points raise.

Yours sincerely

Pauline and Tim Bogle
10 Butler Ave Swanbourne

To Whom It May Concern

We are house owners in Butler Ave, Swanbourne.

We are writing to express our concern about the recent application for 162/164 Alfred Road, Swanbourne - Child Care centre.

We understand that this application is for a large scale commercial childcare centre located in a residential area. The reasons for our objections are as follows:-

Large scale commercial development for 103 people is not appropriate for a residential area.

The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe.

Butler Ave has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to allow the entrance on Butler Ave would be unsafe.

The plans do not align with the WAPC Planning Bulletin 71/2009. In particular:-

- needs to be considered safe from a traffic/safety point of view - it is not due to a blind spot for westbound traffic., 4 interactions in close proximity and Butler Ave has limited visibility .
- should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns in the street. All 3 are violated.
- Parking access should be located at the front of the building. Plans indicate it is at the side.
- No access to be permitted directly from a primary or regional distributor road, a right of way or short access road such as a cup-de-sac or no through road. Butler Ave is a cup-de-sac.
- getting out of Butler Ave at peak hour traffic times onto Alfred Road is difficult. The impact of an additional 322 cars per day will have a significant impact on the surrounding neighbourhood.
- Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side
- Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hour causes congestion. This would be exacerbated .
- Given the limited parking, it is likely visitors to the centre will also park in Mayfair St on the north side of Alfred Road. Trying to access Alfred Road with young children is dangerous in peak hour.
- In the last year there has been two accidents on the Butler Ave and Alfred Rd intersection.
- Turning right from Butler Ave into Alfred Rd in the morning has poor visibility depending on where the sun is. Sometimes you cannot see the road.
- If there was a backlog of vehicles trying to get onto Alfred road, it would not be easily visible to vehicles coming from the south end of Butler Ave due to the steep incline. Residents have had their parked cars written off due to cars moving at speed from south to north on Butler Ave.
- The intersection is extremely busy and in close proximity to other major roads that access the Claremont Centre. This will put more pressure on the intersection.
- Many people with dogs access Lake Claremont via Butler Ave. For the most part there is no footpath. Increased traffic, steep incline , dogs and children - not a good combination.
- In the last year alone there have been two accidents which were not reported to Police. Incline of Butler Ave and limited visibility cause of these accidents.
- There have been too many childcare centres in Claremont and Nedlands with over supply and limited demand. Proof of this is that two shut down in recent times. Mulberry Tree Child Care Centre, at Mt Claremont Primary School and Little Buckets, on Stirling Highway.

We ask that the JDAP strongly reject this inappropriate application.

Sincerely

Loni & Pauline Borge

From: Freddy Botica <freddycbotica@gmail.com>
Sent: Sunday, 24 November 2019 6:58 PM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: Dangerous development

Categories: Ruchira

I would like to add my objection to the childcare facility at 162-164 Alfred Road. It beggars belief that this would be allowed in this location.

The Town of Claremont has said no to the development, as has The State Panel. Surely that is evidence enough to stop this.

Hopefully you will be able to apply some much needed sanity to this situation.

Sincerely,
Fred Botica
7 Milyarm Rise, SWANBOURNE.

Sent from my iPad

From: Michelle Symondson <msymondson@yahoo.co.uk>
Sent: Sunday, 24 November 2019 8:02 PM
To: Town of Claremont
Subject: Development at 162-164 Alfred road

Categories: Ruchira

I would like to object to the development on the grounds of road safety. My son uses the bus stop between Butler Ave and Narla road on a daily basis to get home from school and I am concerned about the impact the development will have on him being able to safely continue to cross Butler road on the way home and Alfred road at the traffic light intersection when this is considered with the new road rule that motorbikes can pass through stationary traffic. <https://www.google.com.au/amp/s/thewest.com.au/news/wa/wa-motorcyclists-can-now-legally-filter-through-traffic-queues-ng-b88873851z.amp>

With traffic queueing motorbikes weaving between stationary vehicles becomes highly probable and will thus make crossing roads in the area far more dangerous especially as there are merge point on Alfred road and no central crossing safety zones for pedestrians.

We all know parents are busy and you only have to view the kiss and go zones at any of the local schools to see on a daily basis the inconsideration of parents, I'm sure that they don't set out to be so inconsiderate or uncaring but extreme work and life pressure make for poor choices combined with inattention and this coupled with phone use and music by pedestrians (my son is a teenage over 6ft tall and I'm still concerned) lead to a dangerous combination and the potential loss of a talented and gifted child and the social impact on the local community. If commonsense is ignored and greed is allowed to succeed. We have all heard the story this month of corruption accused public servants Paul Whyte and the impact of lack of strong governance on greed.

I would also like to point out that the area in question has a wide mix of residents and the impact on the elderly will be just as significant as the bus stop provides a vital lifeline into Claremont for some of the local residents who can no longer drive.

Yours Michelle Symondson
150A Alfred road Swanbourne

Sent from my iPhone

From: Melissa Culley <melissa@culleys.com.au>
Sent: Sunday, 24 November 2019 8:18 PM
To: Town of Claremont
Subject: 162 & 164 Alfred Road Proposed day care site

Categories: Ruchira

To whom it may concern,

I am writing to object to the proposal for a Commercial Childcare Development on the site at 162 & 164 Alfred Road Swanbourne.

I have viewed the revised plans and strongly object to the proposal.

This location is zoned R20 which is a residential Zoning. When any person buys or owns property in this zoning, they are entitled to expect the area will be residential until there are zoning changes or changes to Town Planning Schemes. This area is purely residential.

Additionally during peak traffic conditions including Swanbourne school drop off and pick up periods, this section of Alfred road is extremely congested and dangerous. A child care facility with 12 staff and 65 children will not only significantly increase traffic congestion, but more importantly increase the risk of pedestrian and vehicle incidents given the intersection is frequented by families walking to/from school and children riding to/from school.

We are owner/occupiers on Strickland Street street and have children attending Swanbourne Primary School and are very concerned as the additional traffic will increase risks to our children when riding to school.

The traffic report in the submission did not include the neighbouring intersection 65m away (Alfred/Rochdale) where 2 Swanbourne Primary Children have been hit by cars riding to school this year alone. One of these incidents was extremely serious and the second (from what I am aware) is an ongoing hit and run investigation. This intersection has traffic lights and pedestrian crossing to increase safety and these incidents have still occurred. The Butler intersection is without the safety of lights with pedestrian crossing.

The proposed childcare facility with a significant increase in traffic for the intersection will therefore be increasing the risk to children travelling to and from Swanbourne Primary and as a result I lodge my objection to these plans.

Thank you for your consideration

Kind regards

Melissa Culley

Kate Gale
45 Mayfair Street
Mount Claremont WA 6010
kate@shellabears.com.au

24th November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Mt Claremont and my children attend Swanbourne Primary school which is the local Primary school to which the children of many Mount Claremont residents are zoned. We must enter and exit our street from Alfred Road as this end of Mayfair Street is a cul-de-sac. We are therefore frequent users of Alfred Road and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

- The proposed Centre's proximity to the intersection at Rochdale Road. This is a major intersection which is already very dangerous.
- The banking up of traffic during peak hour (7.30am – 9am and 3pm – 6pm) which already occurs in the area, not to mention how difficult it would be with the added extras of day care patrons during peak hour.
- Safety and traffic impact. Every morning my family use Alfred Road in one of three ways...
 1. My 13-year-old daughter crosses Alfred Road by foot to catch the school bus from the bus stop on the south side of Alfred Road between Butler Avenue and Narla Road. While as a parent, I would prefer my daughter walk east to the Rochdale Road lights in order to cross Alfred Road, human nature and reality means she does not do this and instead runs the gauntlet and often waits 2-3 minutes to cross Alfred Road from North to South. I worry for her safety every morning as the hundreds of cars which travel west to east in the morning down this stretch are either moving very quickly due to the pace picked up coming down the hill from the west, or are banked up from the Rochdale Road lights all the way back west to Narla Road due to the hold up at the Rochdale Road lights. I am extremely worried about the chaos which will occur with even more traffic stopping and starting and turning at this intersection with the addition of a large-scale childcare centre in this immediate location.
 2. My two younger boys ride their bikes to Swanbourne Primary school most mornings. I insist they cross Alfred Road at the Rochdale Road lights, which they do. This means they are then riding along Alfred Road from east to west and always cross Butler Avenue

as they head west along Alfred Road towards Narla Road to head towards Swanbourne Primary school. These are two young boys who also ride with friends who also live in Mount Claremont and attend Swanbourne Primary school to which they are all zoned. I worry for them every day.

3. One or two mornings each week, I drive my children to Swanbourne Primary school, and I am always held up, often for 3-4 minutes, at the bottom of Mayfair Street where it meets Alfred Road. I must turn right from Mayfair onto Alfred Road in order to go to Swanbourne Primary. This right hand turn is so busy, I make a note to turn off the radio and tell my children to be quiet so I can concentrate to find a gap in the traffic. I must frequently power my vehicle to its full power in order to turn out and "find a gap" to enter Alfred Road. The addition of a childcare centre at this intersection will turn this section of the road into absolute chaos and I feel it would only be a matter of time before another serious accident or death occurs in this location.

- I personally know two of the local children who have been hit by cars on Alfred Road around the Rochdale Road traffic lights in the past three months. I am so worried my children will be the next ones hit.
- The rising and setting sun has always been a problem along Alfred Road and has caused many crashes and accidents over the years. The sun is a problem heading east in the morning and west in the afternoon. Cars turning right from Alfred Road into Butler Avenue in the morning to drop off children, will be holding up the traffic flow towards the East. If a Childcare Centre is approved here there will be rear-ending in this location in the mornings as drivers struggle to see other cars stopping to turn right into Butler Avenue at this point.
- The majority of cars travelling along Alfred Road in the morning peak hour, are travelling towards the East to head into the CBD to work, and into the rising sun. The majority morning eastbound traffic does not appear to be acknowledged in the traffic report submitted with the revised Childcare Centre plan. Of course the prevailing traffic direction in the afternoon is westbound, and again into the setting sun. This adds further danger to the already dangerous intersection of Butler Avenue and Alfred Road and Mayfair Street.
- The location of this proposed Childcare Centre is in a purely residential area zoned R20 Residential. Home owners in this area are entitled to expect this area would be purely residential. It may be understandable to develop a childcare centre close to other commercial hubs like high street shops, a train station, or other built-up areas, but this location is completely surrounded by residential homes. The size and scale of the proposed centre is completely out of proportion with the surrounding properties.
- The proposed parking for staff is insufficient. The bus service to Alfred Road is not frequent. The #27 bus services the CBD but does not travel frequently, which means it is unlikely staff will realistically use the bus to travel to and from work, and will instead drive cars and will then park on streets like Mayfair Street and Butler Avenue, which are local streets not designed to hold multiple cars parking on them. This behaviour will cause even more chaos and visibility difficulties at this intersection.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Kate Gale

Sally Skevington
8 Narla Road
Swanbourne WA 6010
0477323244
Sally.skevington3@hotmail.com

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Swanbourne and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

This proposal is for a big business in a residential area. If I asked to put a shop on this block of land with 1/3 of the cars of this proposal, you would not allow it but for some reason there is an idea that a child care centre is good for local people. Small centres (around 20 places) are fine but we are talking about a big business with over a hundred cars visiting per day.

Alfred Road is already busy. It is hard to get from my home from Narla Road onto Alfred each day. Yet you are hoping to increase the amount of traffic on what is a busy road. How long before a child is killed.

The suburb has no through roads. People will have to drive down Butler, turn around then go back to Alfred Road turning either right or left into the traffic. It will be a disaster. What was a quiet street is now going to be used by over 100 people every day. Their amenity will be ruined.

Parents dropping children at day care centres do not just drop them. They park and carry or walk their children in and stay for a while if the child is unsettled. If you have 50 parents arriving around 8 am where will they park?

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Sally Skevington

Debbie Hill

From: Prue Leeming <pleeming@iinet.net.au>
Sent: Monday, 25 November 2019 11:53 AM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: Childcare Facility 162-164 Alfred Rd

Categories: Ruchira

The Town Planner, Claremont and Minister Saffioti,

The ridiculous proposal to build a childcare facility for 65 children and 12 staff at 162-164 Alfred Rd breaks every rule in the WA Planning Commission's book and pays no attention to its hazardous location.

1. The site is 100m west of and close to the very busy Rochdale/Alfred Rd intersection, especially in the morning and evening peak traffic. I know because I cross Alfred Rd/Butler Avenue intersection daily with my dog.
2. The site is on the Butler/Alfred intersection so directly affects the amenity of ALL Butler, Alfred and Mayfair Street residences.
3. The site is NOWHERE NEAR a commercial, recreation, community or education centre. In fact it is plonked into a fully occupied residential area trying to shield itself from excessive traffic and developments.

Swanbourne School is two blocks away. Perhaps the childcare centre could have been incorporated in the Aria Apartments Complex which took land from the school in the first place. Alternatively, the facility might be better sited near the Mount Claremont Community Centre, where a small day care centre already operates. Perth must adhere to strict guidelines for development to preserve its standard of living or fall into the trap of developmental mayhem.

Ask any Butler Street (or Mayfair Street which is opposite) resident how dangerous and tricky it is to exit their street into Alfred Rd on the opposite side. Kennedia Lane (parallel to Alfred Rd) is now a preferred exit for Mayfair St residents to quickly access Rochdale Rd and avoid the Alfred Rd chaos. Adding another 60-80 vehicles twice a day at the same time will be disastrous. Check the Swanbourne Primary School scenario!

In this case I hope the Towns of Claremont / Nedlands and WA Planning Commission pay attention to local residents objections.

Yours sincerely
Prue Leeming

PARADOO CONSULT
64 Mayfair Street
Mount Claremont WA 6010
Ph: 08 9384 2208
Cell: 0431 053 137
pleeming@iinet.net.au

MICHAEL & WENDY LEE

55B Mayfair Street, Mount Claremont W.A. 6010 (P.O. Box 477, West Perth W.A. 6872)

Telephone (08) 9481 5550 Fax (08) 6166 0225

E-mail: michael@mlee.com.au

25 November 2019

The Chief Executive Officer
The Town of Claremont
Stirling Highway
Claremont, WA 6010

Dear Sir/Madam

Re: Proposed Development 162-164 Alfred Road

We enclose the following comments for your attention:

Traffic:

Residents in Butler, Mayfair, Rochdale, Myera, Strickland and Narla all find turning into Alfred Road within that 300 metre stretch that includes the set of lights at Rochdale Road extremely difficult to turn out of these streets in the normal course of their daily commute especially turning right. Adding another 40 or fifty traffic movements each way in peak periods is going to make it worse.

Also, during the warmer months travelling west along Alfred Road in the afternoon around 5.00 p.m. the sun is directly ahead. Cars accelerating from the Rochdale Road lights in a westward direction will be suddenly confronted by cars slowing down to enter the child-minding facility. Accidents are occurring in that stretch of the road already and this will potentially increase the risk of further accidents.

Location:

Siting of a commercial enterprise in an almost totally residential precinct with its associated noise and traffic movements seems to be at odds with the amenity that we enjoy currently on both sides of Alfred Road.

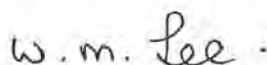
We hereby advise that we formally object to the proposed child-minding facility at 162-164 Alfred Road.

If you have any queries in relation to this matter, please do not hesitate to contact us.

Yours faithfully



Michael Lee OAM CPA



Wendy Lee

Heather Lofthouse

From: jbenneck jbenneck <jbenneck@bigpond.net.au>
Sent: Monday, 25 November 2019 1:15 PM
To: Town of Claremont
Subject: 162-164 Alfred Rd Swanbourne

Categories: Kylie

Planning and Development
Town of Claremont

25 Nov. 2019

Dear Sir/Madam

We are residents of Butler Ave. and have been very happy in our quiet residential area. We are horrified at the prospect of a Large Commercial Child Care Centre being allowed to go ahead 162-164 Alfred Rd. (Cnr. Butler Ave.)

The Traffic situation is very dangerous, without added vehicles

Revised Plans show added access via 162 Alfred Rd. just past Traffic, where traffic merges, this already creates dangerous problems.

Accident rate is low, due to local knowledge and special care taken by local drivers.

The Crossover in Butler Ave. will create many dangerous events & interfere with residents access to our properties.

There already enough Child Care Centres in this area

Another prospective problem is the Rubbish Disposal, which they say will only be done by small vans, Can this be policed?

There only one small section of footpath on the West side of Butler Ave. This means, children (from cars parked in Butler Ave.) will have to be walked along the road and create another traffic problem.

Please count this as 2 separate objections

Thankyou
Clive & Judy Bennecke
3 Butler Ave
Swanbourne 6010

Ph:(08) 9383 2223
Mob:0429384794

From: Don Vreugdenburg <donvreug@hotmail.com>
Sent: Monday, 25 November 2019 2:43 PM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: Proposed childcare development at 162-164 Alfred Road

Categories: Kylie

Dear sirs/madam

I am writing in response to a proposed development of a childcare centre at 162-164 Alfred Road.

I live in the area and am opposed to any such commercial development in a residential area.

I use travel road every day and it is already dangerously overcrowded during morning and afternoon peak traffic times. The addition of a childcare centre will only exacerbate traffic issues since its main drop-off and pickup times will coincide with schools and peak hour traffic.

The development has already been deemed unsuitable by the town of Claremont and the state panel and received a high number of objections from residents. This should be sufficient to stop the project. If not then I am adding my objection to this proposal.

Regards

Don Vreugdenburg
4 Nidjalla Loop, Swanbourne.

From: Susan briggs <briggssn@bigpond.com>
Sent: Monday, 25 November 2019 8:32 PM
To: Town of Claremont
Cc: minister.saffioti@dpc.wa.gov.au
Subject: Proposed Development at 162 - 164 Alfred Rd

Categories: Kylie

As a concerned citizen living in Mayfair St and a professional health and safety manager, working with high hazards and risk management every day, I am astounded that the concept for a commercial development with multiple car entries and exits at peak times is even being considered for Alfred Rd. This concept is close to traffic lights, on a blind corner and across from Mayfair st. Traffic congestion at Mayfair / Butler is already pervasive at peak times in the morning and in the afternoon and I would envision that the majority of cars will be turning across traffic to enter and exit the facility. Buses and school traffic - children at risk crossing the road compete with cars trying to enter Alfred road are already affecting the safe traffic movement through this area to a substantial degree. I have serious questions about the traffic management in and around the facility given it's ability to generate the majority of its traffic while the road system is already under stress.

Regards Susan

From: Giovanni Groppoli <john.groppoli@glenforest.com.au>
Sent: Monday, 25 November 2019 9:40 PM
To: Town of Claremont
Cc: stopddswanbourne@hotmail.com; Minister.Saffioti@dpc.wa.gov.au
Subject: Development at 162--164 Alfred Road, Mt Claremont

Categories: Kylie

Dear Sir/Madam

I wish to lodge an objection on behalf of myself and my family who reside at 8 Nidjalla Loop, Swanbourne.

The proposed development constitutes a major traffic safety issue apart from the disruptive and negative impact it will have on the local community during construction and subsequently.

Having endured the chaos, destructive nature of the construction works and traffic risks created by the Aria Apartment Development in Milyarn Rise, I am able to speak from bitter experience that the community objections, complaints and fears are more than justified.

Please do not underestimate the negative impact that this development will have on the local amenities.

Yours Faithfully

John Groppoli
B.Juris; LLB; FAICD
Solicitor and Consultant

GlenForest Corporate

756 Canning Highway, Applecross WA 6153
PO Box 456 Applecross, WA 6953
M: +61411 558 910
T: +618 9316 1000
E: john.groppoli@glenforest.com.au

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PETA J GRANT

15 Butler Avenue,
Swanbourne 6010 WA
0410 840 380
petajg@bigpond.net.au
ABN: 24674281134



25 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Butler Avenue Swanbourne and a frequent user of Alfred Road and I am writing to express my extreme concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

My other concerns are with safety issues surrounding increased traffic in an already congested merged traffic landscape and the parking issues we will experience is a quiet residential cul-de-sac. Neither the Butler Ave nor the general precinct are designed to cope with this commercial activity.

Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred Rd

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Peta Grant

From: caratti@iinet.net.au
Sent: Tuesday, 26 November 2019 9:12 AM
To: Town of Claremont
Subject: Attn: Planning & Development

Categories: Kylie

Attention: Planning & Development

**Notice of Support of Proposed Development – New Plans
Lot 18 (No. 164) and Lot 19 (No. 162) Alfred Road, Swanbourne**

I write in relation to the proposed child care centre development application Lot 18 (No. 164) and Lot 19 (No. 162) Alfred Road, Swanbourne.

I wish to advise the Town, as the landowner of Lot 18 (No. 164) Alfred Road, Swanbourne, I have reviewed the new plans and support this proposal.

I am of the view the proposed built form reflects the residential character of the surrounding residential area and the proposed use will not cause any impacts on the amenity of the area from a built form, traffic or noise perspective.

Should you require any further information or clarification in relation to this matter, please contact the undersigned.

Yours faithfully,

Aaron Caratti

0409 298 108

Anthony Salom
61 Strickland St
Mt Claremont WA 6010

25th Nov 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

Notice of Support of Proposed Development 162 & 164 Alfred Road, Swanbourne

I am a resident of Mt Claremont, and I am writing to express my support for the recent application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

The reasons for my acceptance are as follows:

- It will provide a needed service to the community
- It will not have an impact on traffic or noise

I ask that the Council strongly ACCEPT this application. I look forward to your response.
Sincerely,

A handwritten signature in black ink, appearing to read 'A. Salom', with a long horizontal stroke extending to the right.

Anthony Salom

From: nathancaratti@iinet.net.au
Sent: Tuesday, 26 November 2019 10:56 AM
To: Town of Claremont
Subject: Attn: Planning & Development

Categories: Kylie

Attention: Planning & Development

**Notice of Support of Proposed Development – New Plans
Lot 18 (No. 164) and Lot 19 (No. 162) Alfred Road, Swanbourne**

I write in relation to the proposed child care centre development application Lot 18 (No. 164) and Lot 19 (No. 162) Alfred Road, Swanbourne.

I wish to advise the Town, as the landowner of Lot 19 (No. 162) Alfred Road, Swanbourne, I have reviewed the new plans and support this proposal.

I am of the view the proposed built form reflects the residential character of the surrounding residential area and the proposed use will not cause any impacts on the amenity of the area from a built form, traffic or noise perspective.

Regards,

Nathan Caratti

0413 326 240

169 Alfred Road
Mt Claremont
WA 6010
Mobile 0413 279 301
Email adroitja@bigpond.net.au

November 28, 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

OBJECTION - Proposed Child Care Centre – 162-164 Alfred Road Swanbourne.

We are residents of Mt Claremont located on Alfred Road diagonally opposite the subject site and we wish to express our concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area and totally at odds with the current land uses in the area.

The whole thrust of development along Alfred Road over the past 20 years has been encouraging of higher density residential from Stubbs Terrace to West Coast Highway – this proposed development is totally incongruous with that development preference and direction.

We strongly object to this development on the grounds of deteriorating safety, increased traffic and negative impact on residential amenity particularly for the residents of Butler Avenue, Mayfair Street and Alfred Road who will be the most significantly affected by street parking – the onsite parks proposed will not be enough and the resultant increased pedestrian movements (particularly across Alfred Road) will be hazardous and dangerous.

The reasons for our objections are as follows:

1. The increased traffic as a result of the development will only exacerbate the already dangerous traffic flows on Alfred Road.
2. The pedestrian flows (and cyclists) along and across Alfred Road – to and from schools and bus stops has not been adequately addressed and the dismissive approach to the impact of the increased traffic by the developers consultants is not reasonable – nor is it objective.
3. Because of the current flows along Alfred Road an increase is going to make peak times even more dangerous particularly turning out of Butler – as we believe earlier video evidence has shown that this is already the case.
4. As residents of 169 Alfred Road for over 20 year we have been alarmed at the build-up of traffic and the difficulty of traversing and entering Alfred Road particularly at Peak periods – which is when most of the traffic flow will emanate from 162-164 Alfred Road.

We have had instances where we have had to help people across the Alfred Road as they juggle children prams and dogs – and the elderly.

5. It is now time for the Councils of Claremont and Nedlands and Main Roads to collectively and properly address the safety issues of this busy road let alone allow further pressure to be placed on an already heavily burdened and dangerous transport route.

We implore the Council to strongly reject this application and to provide a compelling case to MWJDAP to also reject this totally inappropriate application and encourage the developers to build something more in keeping with the predominant land use which is residential in nature.

We look forward to the receipt of your supportive response.

Yours Sincerely,

John Adcock

Robyn Adcock

From: T and J Rogers <tandjrogers66@bigpond.com>
Sent: Tuesday, 26 November 2019 3:12 PM
To: Debbie Hill
Subject: Re: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne

Dear Debbie, we thank you for sending us the 5 plans of the proposed new Child Minding Centre cnr. Alfred & Butler, Mt. Claremont.

We are still very much against this proposal, as it is not in the interests of our suburban area.

Also the traffic problem would still be a huge consideration to contend with.

We strongly support the Council's decision to not allow this venture to go ahead under any circumstances.

Alfred Road is already a very busy venue, with a dip in the road near the traffic lights, making for possible accidents which could be of an horrific nature.

Yours sincerely,
Joan & Terry Rogers
66 Mayfair Street, Mt. Claremont

From: [Debbie Hill](#)
Sent: Tuesday, November 26, 2019 8:18 AM
To: [T and J Rogers](#)
Subject: RE: URGENT: Amended plans - 162 & 164 Alfred Road, Swanbourne

Hello Mr & Mrs Rogers

Thank you for your email. In requesting the link, I am assuming that you also agree to the Terms of Use for the electronic viewing of plans outlined in my first email.

Please find below the link to view the amended plans and additional information for the proposed child care centre:

<https://spaces.hightail.com/receive/Yums0OHg8p>

The access code is **DA2019#47** and the link will expire on 29/11/19.

If your default browser is Internet Explorer and you are unable to view the documents, please try opening the link in Google Chrome. If you are still having difficulties, please let me know.

As noted in the consultation letter, if you wish to make a submission, please email toc@claremont.wa.gov.au.

Should you have any queries regarding the proposal, please contact Lisa Previti on 9285 4300 to discuss further.

Kind regards

Debbie Hill
Administration Officer Planning & Development
Town of Claremont

Number One Claremont
308 Stirling Highway, Claremont
PO Box 54, Claremont WA 6910

From: Michael Caratti <michaelcaratti@amnet.net.au>
Sent: Tuesday, 26 November 2019 11:21 AM
To: Town of Claremont
Subject: RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Categories: Kylie

Dear Sir / Madam

I live at 73 Wood Street in Swanbourne.

I support the application for the Proposed Child Care Centre.

There are limited child care centres in the area making this is a much needed development for the community, many of whom are young families.

From my understanding, most those opposing the centre reside on the same street and sadly fail to see the positive effect the centre will have on the area.

Regards

Michael Caratti
m: 0458 600 733

Phillippa Paton
18 Mayfair Street
Mount Claremont WA 6010
pip.paton@hotmail.com

26 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Mt Claremont and frequent user of Alfred Road as are my three children.

I am writing to express my grave concerns once again about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

My primary concerns regarding the revised plans for a commercial childcare centre located on a very busy road in a residential area is for the safety of children. The fact that the childcare centre's peak operation times will mirror those of young children walking and riding to Swanbourne Primary school, walking to nearby bus stops to get to other schools as well as normal pedestrian use lends itself to a fatal accident waiting to happen.

There have already been a number of children hit by cars on this road either side of the development, fortunately none fatal AS YET!

However the increased traffic that the centre will bring to Alfred Rd and the surrounding roads if given approval will be far more than can be managed with existing usage now.

The traffic at school times both in the morning and the afternoon is already congested, drivers rushing to get their children to and from school, tradesmen and heavy trucks are blocking the road already leading to drivers taking senseless and risky manoeuvres which are witnessed on a daily basis.

The other reasons to support it not getting through is the close proximity to Lake Claremont and the impact it will have on wildlife. This is a protected area as are the fauna that dwell within it and excessive cars whether driving or parking down the side streets on the Swanbourne side look at injuring or killing this protected wildlife, especially during breeding season where these creatures tend to wander further afield.

I absolutely strongly object to this development on the grounds of safety, traffic and impact on residential amenity and concerns with neighbouring wildlife.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Phillippa Paton

From: Kate Ferguson <ferguson.kb@googlemail.com>
Sent: Tuesday, 26 November 2019 12:40 PM
To: Town of Claremont
Subject: Alfred road childcare centre

Categories: Kylie

Attn: Planning and Development

RE: 162 & [164 Alfred Rd](#), Swanbourne. Proposed Child Care Centre

I am a resident of the area and I support the application for the Proposed Child Care Centre. I have a young family and have noticed that there is a shortage of child care centres in the area. Currently the waiting lists in our area for childcare centres is astronomical. I have enrolled my second child into daycare when I was 5 months pregnant and the place available has just been confirmed until AFTER his first birthday. That is an 18 month wait for a childcare place. This is a much needed development for the community. Many of us can not afford to have a nanny look after our children when we go back to work and I do not have family living in the country. I do not believe there will be any negative effects of such a development. Therefore, the more childcare centres the better, I vote YES for this development.

Kind regards,

Dr Kate Ferguson

Sent from my iPhone

From: Tania Willert <twillert82@gmail.com>
Sent: Tuesday, 26 November 2019 2:15 PM
To: Town of Claremont
Subject: 162 - 164 Alfred Rd, Swanbourne proposed Child Care Centre

Categories: Kylie

Attn: Planning and Development

RE: 162 & [164 Alfred Rd](#), Swanbourne. Proposed Child Care Centre

I am a resident of the area and I support the application for the Proposed Child Care Centre.

- I believe the development will be an added benefit to the community
- I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community
- The sight of young children playing outdoors at childcare centres brings a great deal of joy to myself. I am a resident of the area and I strongly support this development.
-
- I do not believe there will be any negative effects of such a development.
- I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves. They are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development.

Regards,
Tania & Glen Willert

0428 808 777

From: Jess Telford <jessietelf@gmail.com>
Sent: Tuesday, 26 November 2019 3:00 PM
To: Town of Claremont
Subject: RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre
Categories: Kylie

Attn: Planning and Development

I am a resident of the area and I support the application for the Proposed Child Care Centre.

- I believe the development will be an added benefit to the community
- I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.
- I do not believe there will be any negative effects of such a development.
- I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves. They are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development.

Regards,

Jess Murray
0422 033 097

Sent from my iPhone

From: Ligaya Q Arcy <ligayaq@yahoo.com>
Sent: Tuesday, 26 November 2019 3:12 PM
To: Town of Claremont
Subject: Proposed child care centre at 162 & 164 Alfred Rd, Swanbourne

Categories: Kylie

Ok

Attn: Planning and Development

I am a resident of the area and I support the application for the Proposed Child Care Centre.

- I believe the development will be an added benefit to the community
- I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.
- I do not believe there will be any negative effects of such a development.
- I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves. They are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development.

Warm Regards,
Ligaya Arcy
0431086843

Swanbourne, 26 November 2019

Sthen Boisen
1 Nidjalla Loop,
Swanbourne WA 6010

Attention the Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Mt Claremont/Swanbourne/Claremont, (or frequent user of Alfred Road) and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

As a daily user of Alfred Road, it is inconceivable that adding another 300+ vehicle movement at the Alfred Road and Butler Avenue will not have an effect on traffic in general, unsafe environment for residents (children in particular), additional noise and pollution.

Furthermore, the proposed amended development will not comply to the WA Planning Commission guidelines, which among other highlights the following three;

- Commercial developments cannot be close to major road intersection where there maybe safety concerns
- Access from a local street must not impact the amenity or the area
- A commercial development (Childcare centre) must not be located in a non-commercial, recreation, community or education area/node

It is in the interest of the local residents, Town of Claremont and everybody using Alfred and Rochdale roads, the proposed commercial facility cannot and should not proceed.

Regards,

Sthen Boisen

From: colin shand <colinjshand@hotmail.com>
Sent: Tuesday, 26 November 2019 3:50 PM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: Stop the dangerous development at 162-164 Alfred Road, Swanbourne

Categories: Kylie

We are residents of 6A Myera Street in Swanbourne. The proposed development for a childcare centre at the above address does not comply with the WA Planning Commission guidelines as regards safety, traffic and residential impact. We emphatically object to this inappropriate proposed commercial development in a residential zone. Our objection fully supports the Stop Dangerous Development in Mt Claremont and Swanbourne group.

Yours sincerely,

Colin & Cheryl Shand

Sent from my iPhone

From: Julie Smith <juliesmith@embroidery-wa.com.au>
Sent: Tuesday, 26 November 2019 12:12 PM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: Proposed Childcare Facility Alfred Road Mount Claremont

Categories: Kylie

Dear Sir or Madam

We have recently been made aware of plans for a proposed Childcare facility being established at 162-164 Alfred Road.

Firstly, we strongly oppose this development. Firstly, it is an already busy intersection and somewhat congested with great care needing to be taken at the traffic lights, this as two lanes become one. The road bends and we already have to be very careful at busy times when exiting Lisle Street onto Alfred Road. We think it is a potentially highly, dangerous position for such a facility, especially as it will naturally be for the use of families and their young children.

80 people coming and going each day is far too much to add to this already busy area.

Yours faithfully

Chris & Julie Smith
34 Lisle Street
Mount Claremont
WA 6010



Accounts

(08) 9361 5781
Units 8-10 / 210 Star Street, Welshpool, WA, 6106
www.dyenamicsublimation.com.au



ACCOUNTS

E accounts@embroidery-wa.com.au
T (08) 9361 5781 F (08) 9361 5782
www.embroidery-wa.com.au
Units 1-7 / 210 Star St, W

From: Elena <elen.vys@gmail.com>
Sent: Tuesday, 26 November 2019 7:57 PM
To: Town of Claremont
Subject: To Object commercial development at 162 Alfred Road, Swanbourne

8A Butler Avenue
Swanbourne, WA 6010
Email: elen.vys@gmail.com

26th November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am writing you as a resident of Swanbourne to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

- I believe, that such a large commercial development is not appropriate in our residential area considering existing traffic problems, which already creates a lot of tension and compromises safety of residents of Butler Ave and Alfred Road. Our community already experiences significant deterioration of traffic congestion and safety issues since 156 apartments were finished and sold out of “Aria Swanbourne Luxury Apartments”. This complex is located just 1 min driving from proposed Child Care Centre (2 Milyarm Rise, Swanbourne WA 6010 is just 400m from 162&164 Alfred Road).
- According to the development plan, all cars for 77 people will need to exit via Butler Avenue, which has the only exit off Alfred Road. I believe, this will cause enormous overload of traffic on Butler Ave, especially in peak traffic periods when residents are trying to exit Butler Avenue driving to work and at the same time parents will need an access to Alfred Road after dropping off kids. If you assume the numbers of total cars entering in peak are correct (which appear to be understated at 26, - you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. On top of that, please consider the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem and affect safety of our kids walking or riding to schools.
- Approval of this development on this corner is irresponsible. As a resident of Butler Avenue I had experienced a lot of situations when driving safety was compromised even by large cars parked near the intersection of Butler Ave and Alfred Road. Please note a lot of blind spots and limited visibility as well as local landscape and traffic lights located less than 100m from Butler Avenue. Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

- The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate and will create extra pressure and tension for local community.
- The plans do not align with the WAPC Planning Bulletin 72/2009. No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)
- The developer makes an unsubstantiated claim on page 8 that " As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Dr Elena Vysotskaya

From: Kate Pascall <katypascall@icloud.com>
Sent: Tuesday, 26 November 2019 8:34 PM
To: Town of Claremont
Subject: 162 & 164 Alfred Rd, Swanbourne - Proposed Child Care Centre

ATTN: Planning and Development

To whom it may concern,

I am a resident of the area and I am writing to express my support for the application for the proposed Child Care Centre on Alfred Road, Swanbourne.

We have a young family and have personally experienced difficulties relating to long wait periods (18 months or longer) for quality child care centres in the area. This is a much needed development to support our growing community.

Regards,

Kate Pascall
47 Griver St, Cottesloe
0467777729

From: Dirk Adams <dirk.adams@albemarle.com>
Sent: Wednesday, 27 November 2019 9:08 AM
To: Town of Claremont; Minister.Saffioti@dpc.wa.gov.au
Cc: Daniela Adams
Subject: Concerns regarding 162 & 164 Alfred Road Swanbourne - Proposed Child Care Centre
Attachments: Dirk Adams.pdf; Daniela Adams.pdf

Dear Ms Saffioti, dear Planning & Development Team,

My wife and I are residents of Swanbourne and frequent users of Alfred Road and we are writing to express our serious concerns about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre, which was recently published. Please refer to attached letters outlining in more detail concerns and reasons.

The application is for a large scale, commercial childcare centre located in the middle of a residential area. We strongly object to this development on the grounds of safety, traffic and the impact on residential amenities.

We ask you to intervene in this matter and rejects the application by providing a compelling case to MWJDAP. I would further like to note that the developer has engaged tier one consultant firms including Rowe Group and Transcore with the aim of achieving best outcome for the developer but not the community.

Kind regards,

Dirk Adams |  ALBEMARLE | Project Director – Delivery | Level 7, 197 St Georges Terrace, Perth, WA, 6000, Australia |  PO Box 7423, CLOISTERS SQUARE PO, Perth WA, 6850, Australia |  08 9347 4126
 +61 458003814 |  dirk.adams@albemarle.com | www.albemarle.com

Dirk Adams
52 Narla Road
Swanbourne 6010 WA
Dirk.adams@albemarle.com

25 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

RE: 162&164 Alfred Road Swanbourne – Proposed Child Care Centre

Dear Planning and Development,

I am a resident of Swanbourne and a frequent user of Alfred Road, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in the middle of a residential area. I strongly object to this development on the grounds of safety, traffic and the impact on residential amenities.

The reasons for my objections are listed in Appendix 1 to this letter.

I ask that the Council reject the application and provide a compelling case to the MWJDAP.

I ask you intervene in this matter. It is obvious that the process introduced by the previous Government now has unintended consequences. The developer has engaged tier one consultants, including Rowe Group as well as Transcore, with the aim of achieving a positive outcome for the developer but not the community.

I look forward to your response.



Sincerely,

Dirk Adams

APPENDIX 1

ISSUES IDENTIFIED WITH THE DEVELOPMENT

- Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.
- The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.
- Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.
- In the new plans, all cars will need to exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.
- The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons
 - It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Nedlands – however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east – compounding the traffic nightmare that will be generated.
 - All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road) – the revised plans do not address this traffic chaos.
 - Figure 2 and calculations have no credibility as the assumptions are not real.
 - Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.
 - If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26....you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.
- The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.

- The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.
- Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.
- The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –
 - Needs to be considered suitable from a traffic/safety point of view – it is not due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Avenue has limited visibility
 - Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road)
 - No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)
- In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic)
- Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.
- Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.
- Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.
- In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.
- If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue
- The intersection directly west – Narla Road and Alfred is extremely busy and is in close proximity. Narla / Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.
- Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.
- The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred.
- There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.

- Adding to further congestion and safety issues - the developer Transcore report on page 5 states that “waste collection **should** take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors.” And “In this case it is also **recommended** that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose.” – there is no guarantee from the developer that this will occur and how can the Council effectively police this?
- The developer makes an unsubstantiated claim on page 8 that “ As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar”. The community is already well serviced with more childcare centres than are required. None of the local centres are full.
- The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required – why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

- The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.

Daniela Adams
52 Narla Road
Swanbourne 6010 WA
Dirk.adams@albemarle.com

25 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

RE: 162&164 Alfred Road Swanbourne – Proposed Child Care Centre

Dear Planning and Development,

I am a resident of Swanbourne and a frequent user of Alfred Road, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in the middle of a residential area. I strongly object to this development on the grounds of safety, traffic and the impact on residential amenities.

The reasons for my objections are listed in Appendix 1 to this letter.

I ask that the Council reject the application and provide a compelling case to the MWJDAP.

I ask you intervene in this matter. It is obvious that the process introduced by the previous Government now has unintended consequences. The developer has engaged tier one consultants, including Rowe Group as well as Transcore, with the aim of achieving a positive outcome for the developer but not the community.

I look forward to your response.

Sincerely,

Daniela Adams

A handwritten signature in black ink, appearing to be 'DA' followed by a stylized flourish.

APPENDIX 1

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TOTAL	65		329.03	211.25	117.78	100

- The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.

From: Dominic Etheridge <dominicetheridge@hotmail.co.uk>
Sent: Wednesday, 27 November 2019 9:57 AM
To: Town of Claremont
Subject: 162/164 Alfred road development

Attn: Planning and Development

RE: 162 & [164 Alfred Rd](#), Swanbourne. Proposed Child Care Centre

I am a resident of the area and I support the application for the Proposed Child Care Centre.

I believe the development will be an added benefit to the community. As I have a young family and have noticed that there is a shortage of child care centres in the area, I feel this is a much needed development for the area. I do not believe there will be any negative effects of such a development.

Regards,

Dominic Etheridge
0448841732

Sent from my iPhone

From: brucemc@westnet.com.au
Sent: Wednesday, 27 November 2019 11:54 AM
To: Town of Claremont; Minister.Saffioti@dpc.wa.gov.au
Subject: RE proposed development 162-164 ALFRED RD

To whom it may concern,

I STRONGLY OBJECT to this DANGEROUS proposed development at 162 Alfred Rd Swanbourne.

Yes, I live near to the proposed site at 26 Swanway Crescent.

Traffic can be chaotic already at school pickup/drop off times for local school, Swanbourne Primary

The large (and objected to) ARIA development nearby on Alfred Rd has also led to a noticeable increase in local traffic.

This has been poorly thought out by the developers; there is likely to be accidents/fatalities as a result.

Rochdale and Alfred road are increasingly busy, and west going traffic on Alfred has to merge right at the point of proposed development.

Housing a child care centre there would be a bad decision.!

I will hold facilitators/developers to be contributors to any serious accidents involving children if this proposal is approved.

There are good reasons why Town of Claremont and State Panel have said NO to previous application.

Bruce J McLeod DR (MBChB FFARCS FANZCA)

From: Meg Kitcher <megan@kitchergroup.com>
Sent: Wednesday, 27 November 2019 12:52 PM
To: Town of Claremont
Subject: Attn: Planning and Development

To Whom It May Concern

Proposed Child Care Centre
162 & 164
Alfred Road
Swanbourne

As local residents we support the application for the Proposed Child Care Centre at Alfred Road, see following reasons to support our feelings;

- The need for additional child care facilities is important to the local working parents
- We have found the selection of available child care is limited and often wait lists apply
- Child Care Centres are helpful in building local friendships and often these children will continue to junior and senior schooling together
- We do not feel that Child Care centres have any negative effects on the local community and are often very secure and not a noise risk

Kind Regards

Brad and Megan Kitcher
0404 820 905

Cathy and Peter Wiese
75A Strickland Street
Swanbourne WA 6010
peter.wiese@iinet.net.au

27 November 2019

The Officer in Charge
Department of Planning and Development
PO Box 54
Claremont WA 6910

Email: toc@claremont.wa.gov.au

Dear Sir or Madam,

We live in the southern section of Strickland Street in Swanbourne, a couple of blocks from this proposed development. Where we live, Strickland Street is a cul-de-sac whose only access is from Alfred Road. We are therefore very frequent users of Alfred Road, in both directions.

We are writing to express our concern about the revised application for the development of 162 — 164 Alfred Road Swanbourne as a child care centre.

This application is for a large scale, commercial childcare centre located in a residential area. We are of the view that there are strong and valid reasons for objection to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for our objection include the following.

1. A large, scale commercial development for occupation by up to 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.
2. The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One has resulted in a 10 year old boy critically injured.
3. Approval of this development on this corner is irresponsible. The likelihood of serious injury or worse is significant given the traffic chaos that will be caused with traffic heading to city and 3 local schools, children riding to school along and across Alfred Road and local residents trying to gain access to Alfred Road and cross it.
4. In the new plans, all cars will need to leave the proposed development via Butler Avenue. This will create significant traffic difficulties. In the peak period between 8 am and 9 am, 70% of the traffic travels east towards the city. Thus, while the developers have added an entrance for west-bound traffic, the bulk of the traffic in the morning headed for the proposed child care centre will be east-bound and will need to turn right into Butler Avenue. Similarly, as the only exit is onto Butler Avenue, the bulk of the traffic leaving the child care centre will need to turn right into Alfred Road to travel eastwards. This intersection is already under duress.
5. The traffic modelling provided by the developer on page 9 of the Transcore report is unrealistic for the following reasons:
 - a. It claims 70% of traffic in the morning peak period will come from the east. There is no basis for this claim. There are already many childcare centres to the east in Claremont and Nedlands, but very few to the west. In addition, 70% of the general morning peak traffic comes from the west travelling eastwards – compounding the traffic nightmare that will be generated.

- b. All traffic leaving the proposed child care centre will need to leave on Butler Avenue and 70% of them will want to turn right and travel east along Alfred Road. The revised plans do not address the likely resultant traffic chaos.
 - c. There must be serious doubt about the calculations and assumptions behind Figure 2.
 - d. Figure 3 has been modelled assuming 70% of morning peak traffic comes from the west travelling eastwards, and that it will then return westwards. However, it is common sense to expect that most of these working parents will in fact continue eastwards to the City of Subiaco to work after dropping off their children. The claim that only 7 parents would want to exit Butler Avenue to the east in the morning peak period is nothing more than a wild guess.
- 6. The plans assume that staff will be required to park on the street, with only 0.5 bays per person provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. Services only commence at 8:05 am from the city whereas the centre opens at 6:30 am.
- 7. The centre will be open from 6:30 am until 6:30 pm and the Transcore report claims that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05 am, this claim is invalid. Staff will be unable to use this as an option.
- 8. Butler Avenue has a steep incline up to Alfred Road and is not very safe near the top end, with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.
- 9. The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –
 - a. The plans need to be considered suitable from a traffic safety point of view – they do not deal with the current blind spot for west-bound traffic (together with merging), 4 intersections in close proximity and the limited visibility on Butler Avenue.
 - b. A centre such as this should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (the plans fail to meet all 3 of these concerns). The planned childcare facility is close to a major intersection (Rochdale Road and Alfred Road) and an intersection that is already under pressure (Butler Avenue and Alfred Road)
 - c. WAPC Planning Bulletin 72/2009 does not allow access directly from a primary or regional distributor road, a right of way or short access road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac).
- 10. In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. An additional 228+ cars per day will have a hugely negative impact on the surrounding neighbourhood (an increase in traffic of more than 150%).
- 11. The visibility on Alfred Road for westbound traffic is poor. There is a bend in the road near the Butler Avenue corner and a driver cannot see beyond the curve of the road on the left side.
- 12. Travelling westbound between Rochdale Road and Butler Avenue the traffic also merges which, during peak hours, causes congestion. This would be exacerbated by the traffic using the proposed child care centre
- 13. Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour (in fact, at any time).
- 14. In the mornings, turning right onto Alfred Road from Butler Avenue, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.
- 15. If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily be visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue.

16. The intersection directly to the west, of Narla and Alfred Roads, is extremely busy and is in close proximity. Narla and Devons road are popular access roads to the Claremont shopping centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.
17. Many people with dogs travel to Lake Claremont via Butler Avenue and, for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.
18. The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other involved someone trying to pull out of Butler Avenue onto Alfred Road.
19. There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Childcare centres are more appropriately co-located with schools.
20. How can the Council effectively police adherence with the requirement that "waste collection should take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors," and that "In this case it is also recommended that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose"?
21. The internal space for the revised plans is a lot larger than the original scheme (nearly 30 square metres larger) and much larger than legally required. Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

In our view the Council should strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application.

Yours sincerely



for Cathy and Peter Wiese

From: stefano bussi <stefanobussi81@gmail.com>
Sent: Wednesday, 27 November 2019 2:18 PM
To: Town of Claremont
Subject: Attn: Planning and Development_Proposed Child Care Centre

To whom it may concern,

My name is Stefano Bussi, I am currently living with my family in Swanbourne, next to Allen Park.

I'm sending this email to support the application for the Proposed Child Care Centre at 162 & 164 Alfred Rd, Swanbourne .

I'm father to two young kids, my wife and myself would love to have an extra childcare around as right now there is only one centre really close to our home. I know family friends around the area with young kids would love an extra option too.

We fell in love with beautiful Swanbourne also because of all the young families around and quite frankly for us every extra facility that can help us and the development of our kids is just a blessing.

We strongly believe that good healthy environments are essential for the development of the kids and just good for the community in general.

I support and vote YES for this development.

Thank you,

Stefano Bussi

--

S T E F A N O B U S S I
SWANBOURNE, WESTERN AUSTRALIA

M: 0450 349 482

From: Bernice Forbes <bernicef@westnet.com.au>
Sent: Wednesday, 27 November 2019 2:54 PM
To: Town of Claremont
Subject: Dangerous Development close to Alfred/Rochdale Rd

Good Day

As a frequent commuter in this area I am concerned about the impact on traffic this development will have. There are other areas that could rather be viewed as more favourable.

Regards,

Bernice

From: Khee Lim <klim@ccgs.wa.edu.au>
Sent: Wednesday, 27 November 2019 9:04 PM
To: Town of Claremont
Subject: Objections to development at 162-164 Alfred Road

Categories: Ruchira

Dear Town of Claremont,

It has come to our attention that after overwhelming objections from relevant authorities to the above development, the developer has re-submitted an amended application which is still in breach of many rules.

Our objections to the application included the following:

1. The proposed site is about 100m from Rochdale/Alfred Road traffic lights and sits in a blind spot for west bound traffic due to the bend in Alfred Road.
2. The Alfred Road/Butler Avenue intersection is hazardous. particularly at peak hours. There have been 3 serious accidents along this strip in the last 3 months.
3. The application does not comply with WA Planning Commission guidelines which stipulate that the child-care facility cannot be close to major road intersection for safety reasons and it should not impact the amenity of the local area.
4. Traffic assessment report done by the developer does not address safety and local amenity impacts.

Thank you.

Regards,
Khee & Hui LIM
25 Swanway Crescent,
Swanbourne, WA 6010

From: Fleur Florist Supply <fleurs@bigpond.net.au>
Sent: Wednesday, 27 November 2019 8:09 PM
To: Town of Claremont
Cc: minister.saffioti@dpc.wa.gov.au
Subject: Development at 162-164 Alfred Road , Swanbourne

Categories: Ruchira

B.C & KA Ward
12 Butler Ave
Swanbourne 6010

27th November 2019

Town of Claremont
Planning and Development
308 Stirling Highway
Claremont 6010.

Ref: Proposed Child Care Centre at 162 & 164 Alfred Road

Dear Debbie

We are residents of Butler Avenue Swanbourne and are writing regarding the revised plans for the Child Care Centre. The second application still does not comply with the WA Planning Commission guidelines which state Child Care Centres:

- a) Must be located in a commercial, community, recreation or educational area.
- b) Cannot be close to major road intersection where there may be safety concerns.
- c) Access from a local street must not impact the amenity of the area.

The proposed site is in a Residential Area. The new traffic assessment report by the Developer does not address safety and local amenity concerns as the Butler Avenue/ Alfred Road intersection is already dangerous due to poor visibility because of the bend. The increased traffic flow will add to more accidents and injury.

I ask that the Council and the State Administrative Tribunal reject this revised applications for the same reasons the original application was rejected by Claremont Council and Metro West JDAP.

Yours sincerely

Barry and Karen Ward

From: Lou Paris <parislou@hotmail.com>
Sent: Wednesday, 27 November 2019 3:54 PM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: UNFETTERED DEVELOPERS

Categories: Ruchira

I wish to express my disgust at the situation where, despite non-compliance, danger, community disapproval and several refusals by council and government, the developers who have put forward this ridiculous proposal for a childcare facility on a dangerous intersection in our residential area are still able to press for its acceptance. Please oppose this imposition in the strongest way.

Lou Paris
Lisle Village
MOUNT CLAREMONT

From: Jenny Purse <kjpurse1@bigpond.net.au>
Sent: Wednesday, 27 November 2019 6:25 PM
To: Town of Claremont
Subject: P 54lanning and Development

Categories: Sage

Town of Claremont
Planning and Development
PO Box Claremont. WA. 6910
toc@claremont.wa.gov.au

26th November, 2019.

To Whom it May Concern,

I have been a resident in Butler Avenue, Swanbourne for 19 (nineteen) years and I wish to express my alarm and grave concerns at the revised submission for a Child Care Centre at 162 – 164 Alfred Road, Swanbourne.

The current application is for a commercial Child Care Centre in the midst of a residential location. There is limited parking within the facility and NO available commercial parking nearby.

It is positioned on the corner of Alfred Road and Butler Avenue (a no through road).

The entry into the proposed Child Care Centre is to be off Alfred Road, less than 100 metres from the traffic light intersection between Rochdale Road, Alfred Road, and Myera Streets. All these streets are one lane each way. The only exit from the Centre is into Butler Avenue then a left or right turn onto Alfred Road.

Directly opposite the Centre's entry is a bus stop! During set down and pick up of passengers at this stop, traffic moving east along Alfred Road comes to a standstill. One cannot pass the stationary bus.

There are two more nearby entries into Alfred Road, namely Mayfair Street and Narla Road both of which add to the traffic congestion especially at peak times.

Alfred Road is an existing thoroughfare road eastwards from West Coast Highway and already carries a large volume of traffic east and west including trucks and vehicles from the Swanbourne Army Barracks. There is a very real visibility hazard for drivers travelling east in the mornings and west in the afternoons, directly into the sunrise or afternoon sunset. At times, the sun is blinding.

Combine this with the bend in Alfred Road between Rochdale Road lights and Butler Avenue AS WELL AS NO visibility from Butler Avenue towards the lights when there are cars on the south verge eg. turning into the Centre. This is a predictable, extremely dangerous, traffic nightmare each morning and evening ie. ten (10) times per week. Common sense must prevail or we will be witnessing numerous, terrible accidents involving cars and possibly human lives.

I sincerely do not wish to stand by and watch this disaster unfold, hence this email of extreme concern – this is the wrong position for a CCC.

I am certainly supportive of Child Care Centres BUT, they MUST be in appropriate areas where safety is paramount for everyone. Not only is this a residential area, it is already congested with increasing traffic concerns. Many residences in Butler Avenue have a second car which is parked on the verge, coupled with family and visitors whose parking can only be on the verge. This development affects our quality of everyday life.

There are two residential blocks for sale immediately west of the Rochdale Road lights whose only access will be in and out of Alfred Road.

Considering the traffic congestion which exists in the area, I ask that you seriously address the prospect of 40 -60 more cars into the mix, attempting to drop off and pick up little children. Please imagine the entry off Alfred Road immediately after the traffic lights and then the exit out of Butler Avenue and onto Alfred Road. Drivers are frustrated even now at the difficulty experienced particularly trying to turn right onto Alfred Road from Butler Avenue at busy times.

I especially ask that you take a moment to consider how much time it takes to park one's car, safely, in the limited car parking places within the Centre, get one or two children out of their car seats, collect their backpack, walk into

the Centre, wait until someone is available to register your child/children, farewell your child and leave safely. In my experience, this process will take approximately 9-10 minutes per car.

There will be a huge backlog of car queuing, frustration and probably attempts to find alternative parking on a street which has cars parked on the street already. This is a residential area!! Parents will be excessively frustrated as they try to get to work on time.

Pedestrians are only partially catered for as there is no continuous footpath in Butler Avenue and walking on south Alfred Road either way will be like playing "dodge-em" with traffic travelling east and west as well as turning into the Centre.

Cyclists are in the same predicament.

This also includes utility vehicles – rubbish collection, food and grocery delivery daily, office and play materials, play equipment deliveries, laundry collection and deliveries, maintenance, cleaners, staff and of course, visitors for Grandparent Days, performances, parent interviews etc. Child Care Centres are very busy hubs where parent/family interaction is encouraged – therefore, even more cars in the area.

In conclusion, I strongly urge you, in your experience and wisdom, to responsibly acknowledge the numerous and overall, potentially catastrophic situation the proposed development will undoubtedly cause if allowed to proceed.

I trust in your better judgement.

With kind regards,

Jenny Purse.

mellfam

Mellor Family

E: mellfam@bigpond.com

Chris Mellor & Ann O'Mahony
7 Butler Ave
Swanbourne WA 6010

28 November 2019

Town of Claremont
Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Attn: Planning and Development,

We are the residents and owners of 7 Butler Ave Swanbourne and wish to express our objections to the recent application to the MWJDAP for a development at 162&164 Alfred Road, Swanbourne – Proposed Child Care Centre.

The reasons for our objection are as follows:

- The Centre is a commercial facility located inappropriately in a residential area
- The visual appearance of the child care centre is inappropriate
- The car park is inadequately screened from view from residences
- The traffic impacts of the centre will be unacceptable
- The noise impacts of the centre will be unacceptable
- The need for the child care centre is not established

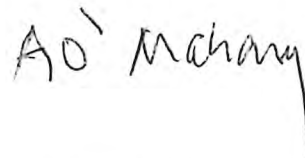
Please refer to the following report for explanation and detail of the specific grounds for these areas of objection.

We request that the Council clearly reject this proposal and provide a compelling case to MWJDAP to also reject this inappropriate application.

Yours Sincerely,



Chris Mellor



Ann O'Mahony

Memorandum

To	Planning and Development	From	Chris Mellor
Company	Town of Claremont	Pages (including this page)	
Project	162 & 164 Alfred Rd Child Care Centre	Date	28 November 2019
Subject	Grounds for Objection to Proposal	File Code	1901B50 191126 Objection Grounds

We have reviewed the proposal for a 65 place Child Care Centre at 162 and 164 Alfred Rd against WAPC Planning Bulletin 72/2009 Child Care Centres (PB72), Town of Claremont Local Planning Scheme 3 (LPS3) and Local Planning Policy 206 - Child Care Centres (LPP206)

The Centre is a commercial facility located inappropriately in a residential area

PB72 section 3.2 Objectives states that one of the objectives of the WAPC policy is to

"minimize the impact of a child care centre has on its surrounds, in particular on the amenity of existing residential areas."

The proposed commercial centre is located inappropriately in an existing residential area on land zoned as Residential R20. In LPS3 Table 1 a Day Care Centre is listed as "SA" in an area zoned Residential. This means that in exceptional cases only the Council may specially approve a day care centre where certain conditions are satisfied, including the following:

"any building to be erected on the land will not have any adverse or detrimental effect on the residents or on the amenity of or the properties in the locality".

The proposal to inappropriate locate a commercial Child Care Centre in this residential area has previously been rejected by both the Town of Claremont and by the Metropolitan West Joint Development Assessment Panel (JDAP) because it was accepted that it would have an adverse or detrimental effect on the residents and the amenity of the properties in the area.

The State Administrative Tribunal (SAT) mediation process that preceded this revised application has not resulted in a scheme that is any more acceptable. The proposed Centre is not a small local one that will have minimal impact but at least a 65 place, 12 minimum staff now two storey commercial Centre that will cater to parents from out of the immediate area. The size, scale, height and form of the building, the large inadequately screened car park and access and the excessive amount of traffic and parking generated will all be detrimental to the amenity of the surrounding residential area such that special approval should not be granted.

LPP206 notes that preferred locations for centres are on:

"... lots zoned "Local Centre", "Town Centre", "Highway", or "Educational", or on "Residential" lots immediately adjacent to these zones,

The site does not comply with this provision as it is not immediately adjacent to any of the listed uses and the adjoining residential use is not compatible with a commercial Centre. The nearest education facility, Swanbourne Primary School, is isolated from the site by busy Narla Road and is over 400m from the site to the school buildings by the shortest route. If the manned Narla road pedestrian crossing is used the distance to the school buildings is in excess of 600m.

The visual appearance of the child care centre is inappropriate

PB72 section 3.5 Design of Centres requires that:

"... In the absence of any specific provisions, the visual appearance of the development should reflect the character of the area, enhance its amenity ..."

LPS3 Clause 46 requires (among other things) that development in the Residential zone shall have regard to the following objectives:

(3) the continuation of the domestic scale and architectural character of the area of the proposed development;

(4) the preservation of the traditional housing character of the Zone;

Memorandum

LPP206 states

"Visual appearance of developments should reflect the character of the area, enhance its amenity..."

The proposed large scale two storey commercial Centre does not continue the domestic scale of the street as is shown on the following streetscape.



The Centre is a taller and far larger building and car park than any adjacent house. The height of the now two storey Centre is excessive and out of scale with the adjacent residences. LPS3 Clause 40(3) nominates a maximum height of 6.6m in a Residential area, measured from the natural ground level. Most residences, including those in Butler Ave are far less than this maximum. The Centre is typically the maximum permitted 6.6m high to eaves, but this has been measured to the ground floor level which is higher than the natural ground level.

The Centre is 21.6m long facing Butler Ave and is 24m wide facing Alfred Rd, both dimensions being larger than the width of a standard block frontage in the area and far wider than the typical house street frontage. The area of paving required for parking and access is in excess of 670 sq m which is 80% of the area of a standard block in Butler Ave. The roof is excessively large and the design language associated with the framing for the large first floor play areas is heavy and out of context with a residential area and the weatherboard cladding is not typical.

The physical size of the Centre has actually increased since the previous application despite the reduction in the number of places offered. The original single level proposal was for a 624 sq m building with an additional 190 sq m of external covered Play space for a total area of 814 sq m. This proposal included 292 sq m of internal Activity space for the 87 place offered.

Despite the reduction in places by 22 the two storey 65 place proposal is for a larger 635 sq m building with an additional 238 sq m of external covered Play space, much of which is located on the first floor. The overall area is 873 sq m. The internal Activity space has increased to 330 sq m, which is enough for 100 complying places, 35 more than is proposed and far more than has been used to assess staff numbers, car parking requirements and vehicle movements. The excess of Activity space area is unexplained and results in a Centre that is at least 100sq m larger than necessary. The roofed area of the two storey proposal, including first floor covered play areas is 580sq m. The Centre roofed area is over twice that of adjacent residences.

EXCESS AREA OF ACTIVITY ROOMS

Name	No Children	Age group	Area Provided (sq m)	Minimum Area (3.25 sq m child)	Surplus area (sq m)	Max no. (3.25 sq m child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

Memorandum

The car park is inadequately screened from view from residences

LPP206 states:

"Landscaping shall not contain toxic plants, and be provided along street frontages with a minimum width of 2 metres compatible with adjoining residential properties and at a height which does not result in an access/visibility hazard at the access crossover."

The proposal provides one metre only of the car parking screening to Butler Ave and Alfred Rd, one metre less than is required. The 670 sq m of car parking and extended access way covers the whole frontage of the Centre to both streets and the activity and noise generated will be highly visible from residences with consequent loss of amenity.

The traffic impacts of the centre will be unacceptable

PB72 section 3.6 Traffic impacts states that a centre

"should be approved only if it can be demonstrated that it will have a minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users."

LPP206 notes that access is not permitted directly from:

"...Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads."

The main entry is from Butler Ave which is a cul-de-sac and no through road. Butler Ave is not permitted under LPP206 to provide access to the centre. This entry is also only 35m from Alfred Rd which is less than is required by Figure 3.1 of AS/NZS 2890.1 Off Street Parking.

An Alfred Rd entry only for vehicles travelling west is proposed as well as a main Centre entry/exit from Butler Ave. Alfred Rd is a Distributor A road and the location of this entry is in a risky location that is obscured by the bend in the road, is too close to the Rochdale Rd traffic lights, and is in a dangerous zone where traffic is merging and where the afternoon setting sun reduces visibility. It is inevitable that accidents will result if this access is permitted.

The centre will generate excessive traffic, parking and queuing in Butler Ave which is a dead end residential street with a slope of 1:7 in the centre section. Twelve staff at least will be employed but only 6 staff parking bays are provided, one of which is a tandem bay. The extra traffic generated will access Butler Ave through the intersection of Butler Ave and Alfred Rd. This intersection is already marginal at peak hours, as is the adjacent intersection between Narla Rd and Alfred Rd. The increased traffic and parking will negatively impact on the amenity of Butler Ave and will exacerbate the existing shortcomings and risks of the Alfred Road junction.

The need for a child care centre is not established

PB72 section 3.8 requires that:

"if there is a demonstrable impact on the amenity of an area or the level of service enjoyed by a community the applicant should prove the need for commercial facility."

LPP206 states:

'In order to assess the impact to the local community on the impact a proposed Child Care Centre has on the level of service of similar or approved facilities, applications are to include information on the level of existing (or proposed) services in the locality, proximity to other centres, population catchments for the proposed centre and the number of primary schools and kindergartens in the locality, together with the number of students at these facilities.'

No information has been submitted establishing the need for a child care centre in the location, especially not the need for a 65 place commercial centre located in an existing residential area.

Memorandum

LPP206 also states:

'Approvals should only be issued where it can be demonstrated that the Child Care Centre will have minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians, cyclists or road users.'

This report establishes that the proposal does not comply with this condition in many ways and that approval of the project would be at the direct cost of the amenity of residents of Butler Avenue and surrounding residential areas.

The noise impacts of the centre will be unacceptable

PB72 section 3.7 Noise Impacts requires that:

"where a child care centre is located adjacent to a noise sensitive area such as a houses, retirement villages and nursing homes, the noise generating activities of the child care centre such as outdoor playing areas parking areas and any plant or equipment are to be located away from the noise sensitive use. "

The noise of children playing may be a joy in small numbers, but the noise of many children from a 65 place Centre playing in a street facing first floor external play area is another case and the amenity of the immediate neighbouring houses will be negatively affected.

Conclusion

The proposed Centre breaches many of the planning regulations that are outlined in the applicable planning documents WAPC Planning Bulletin 72/2009 Child Care Centres, Town of Claremont Local Planning Scheme 3 and Local Planning Policy 206 - Child Care Centres

The proposed Centre is no more acceptable than the rejected scheme that preceded it.

It remains a commercial development of excessive size that is inappropriately located on a site zoned residential and that is surrounded by existing houses.

The operations, size, scale and height of the Centre are not compatible with the neighbouring residences.

The building and activity areas provided are far larger than is required, leading to the possibility for future increases in the number of places offered. Parking provisions and traffic calculations take no account of any possible increases in places offered.

The proposal will create significant traffic and street parking in a quiet residential street that is partly steeply sloped, is a dead end and that has a problematic link with busy Alfred Rd.

There is no justification for the Special Approval required for the location of the Centre in an area zoned residential as the proposal is inappropriate and will significantly negatively affect the amenity of the surrounding residential area.

The proposal should be rejected.

From: Bruce Leach <bruce.leach.ips@gmail.com>
Sent: Thursday, 28 November 2019 8:29 AM
To: Town of Claremont
Subject: 162-164 Alfred Road Development

Categories: Sage

Dear Sir or Madame

I would like to bring your attention to the danger of your proposed development at 162-164 Alfred Road with an actual example as described below:

My son, Terence Leach, was hit by a speeding car as he was bicycling home from Scotch College. He was crossing Alfred Road from the south (Butler Road) with no car in sight. A car came spending from his right have just "beaten the lights" at the Rochdale intersection; the driver braked but still hit my son, who was very badly shaken, bruised and cut, but fortunately nothing more serious. Building more structures on this dangerous South East corner of the Butler/Rochdale junction is inviting tragedy. Please re-consider .

Bruce Leach
35 Lisle Street
Mount Claremont 6010
Perth, Australia
Home Tel: +61-8-9383-2727
Mobile: +61-(0)410-522-858

From: John Caratti <johncaratti@iinet.net.au>
Sent: Thursday, 28 November 2019 10:25 AM
To: Town of Claremont
Subject: 162-164 Alfred Rd SWANBOURNE - child care

Attention: Planning

RE: 162-164 Alfred Rd SWANBOURNE – Proposed Child Care Centre

I support the proposed child care centre.

Regards

John Caratti
0409 096 196

From: paultestar@iinet.net.au
Sent: Thursday, 28 November 2019 11:10 AM
To: Town of Claremont
Subject: Proposed Child Care - 162-164 Alfred road Swanbourne

Attn Planning and Development

I support the proposed development for a childcare centre at the above address.
This will be of benefit to the area and adds a much needed service to ratepayers .
I cannot understand any reason that this development would not go ahead.

Paul Testar

Mob 0416 151 193

16 Myera Street,
Swanbourne, 6010
Western Australia

28th Nov 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Sir,

Re Planning and Development,

I am a resident of Swanbourne, in a street that enters Alfred Road near the proposed development, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

This is a very busy road, during the day and especially during peak hours and it is utilised by commercial vehicles, through traffic and many children either walking or being driven to nearby schools, of which there are many. Further congestion will only cause problems and could lead to accidents.

Furthermore, this is a residential area and a commercial enterprise such as this does not sit well with the existing properties. There are no other commercial activities in this area.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Julian and Lesley Russell

From: Sarah <sarahzilko2008@hotmail.com>
Sent: Thursday, 28 November 2019 10:07 AM
To: Town of Claremont
Subject: Revised application for 162 and 164 Alfred Road Swanbourne - Proposed Child Care Centre

Categories: Sage

28 November 2019

Dear Planning and Development,

I am a resident of Mt Claremont, and a frequent user of Alfred Road, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

- In the new plans, all cars will need to exit via Butler Avenue. This will increase traffic congestion. During peak morning hours, between 8am and 9am, 70% of the traffic travel east towards the city. While the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. The only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.
- In peak hour, getting out of Butler Avenue turning east onto Alfred Road (toward the city) is already difficult due to high volumes of traffic and the poor visibility due to the bend in the road, and the position of the sun. At times the glare is amplified by the sunlight and reduces visibility significantly.
- The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic. Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. The modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east along Alfred Road to the city or Subiaco to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.
- The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.
- The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.
- The impact of additional 228+ cars per day will have a huge negative impact on the surrounding neighbourhood (150% + increase in traffic)
- The developer makes an unsubstantiated claim on page 8 that " As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Sarah Zilko

3 Lisle Street, Mount Claremont

From: Guy Webster <guy@vectorlifting.com.au>
Sent: Thursday, 28 November 2019 11:17 AM
To: Town of Claremont
Subject: Attn: Planning and Development -- Proposed child care center at 162 & 164 Alfred Rd, Swanbourne

Attn: Planning and Development
RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

My wife and I are currently looking at purchasing in the area and have noticed a lack of child care centres in the area.

I support the application for the Proposed Child Care Centre and do not believe there will be any negative effects of such a development on the immediate or surrounding areas.

Kind Regards,

Guy Webster
Project Manager



43 Spencer St, Cockburn Central, WA 6164 | Po Box 3165, Success WA 6964
Phone: 0414 900 035
Website: www.vectorlifting.com.au | Email: guy@vectorlifting.com.au

From: Kieran Glaser <kglaser@ahrens.com.au>
Sent: Thursday, 28 November 2019 11:19 AM
To: Town of Claremont
Subject: RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Categories: Sage

Attn: Planning and Development,

RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

I support the application for the Proposed Child Care Centre.

- I believe the development will be an added benefit to the community and I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.
- I do not believe there will be any negative effects of such a development. Therefore, the more childcare centres the better, I vote YES for this development.

Regards,

Kieran Glaser
Division Manager



Unit 1, 8 Preston Street, Como, WA 6152
Mobile: 0408 185 373
Email: kglaser@ahrens.com.au



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From: Ian Smyth <ian.smyth@fjmproperty.com.au>
Sent: Thursday, 28 November 2019 11:21 AM
To: Town of Claremont
Subject: 162 & 164 Alfred Rd, Swanbourne - Email of Support for Proposed Child Care Centre

Categories: Sage

Dear Planning and Development,

I would like to register my support for the proposed child care centre to be located at 162 & 164 Alfred Rd, Swanbourne.

I am not an immediate resident but I am a devoted community member, regularly frequenting:

- the local gym with my wife and children,
- Claremont shopping centre, and
- Cottesloe Golf Club.

While I do not believe in inconsiderate development, I do believe in affording the community options and providing diversity in employment opportunities, both of which the child care will provide.

Please consider this email as my formal endorsement of the proposed application.

Regards,



Ian Smyth Development Manager

Direct +61 8 9383 0716 | Mobile 0411 737 798 | www.fjmproperty.com.au
Lv13, 338 Barker Road | Subiaco WA 6008 | PO Box 879 Subiaco WA 6904

From: Jack Johns <jjohns@nascentcp.com.au>
Sent: Thursday, 28 November 2019 11:27 AM
To: Town of Claremont
Subject: Child Care Centre at 162 & 164 Alfred Rd, Swanbourne

Categories: Sage

Attn: Planning and Development
RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Dear Town of Claremont

I support the application for the Proposed Child Care Centre.

I believe the development will be an added benefit to the community

Regards,

JACK JOHNS
Investment Adviser



Tel +61 8 9389 3602
Mob +61 419 600 060
Email jjohns@nascentcp.com.au
Web www.nascentcp.com.au

Level 2, 55 Carrington Street, Nedlands WA 6009
PO Box 883, Nedlands WA 6909

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From: glenn_mammoth@bigpond.com
Sent: Thursday, 28 November 2019 11:35 AM
To: Town of Claremont
Subject: Attn planning & development

Categories: Sage

Proposed child care development 162-164 Alfred Rd Swanbourne

As a resident of the area I strongly support this development.

Regards

Glenn Durrant
0412 946660

From: Mark Sandford <msandford@nascentcp.com.au>
Sent: Thursday, 28 November 2019 11:36 AM
To: Town of Claremont
Subject: Attn: Planning and Development

Categories: Emma

Good morning,

RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre.

I support the application for the Proposed Child Care Centre.

I do not believe there will be any negative effects of such a development.

Cheers,

MARK SANDFORD
Investment Adviser



N A S C E N T
CAPITAL PARTNERS

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From: Banfield <banfield@westnet.com.au>
Sent: Thursday, 28 November 2019 11:38 AM
To: Town of Claremont
Subject: Proposed childcare centre Alfred Rd

Debbie and Robert Banfield
11a Cornwall St
Swanbourne WA 6010
banfield@westnet.com.au

26th November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Swanbourne, (and a frequent user of Alfred Road) and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

It is already extremely difficult to turn onto Alfred Rd from Narla St. The increased traffic from a childcare centre would make it impossible.

- This application received the most objections of any development in the last DECADE in July 2019. The Town of Claremont said NO. The State Panel said NO. Now they have appealed to the Tribunal. We MUST STOP these greedy developers.
- How is it fair that they can bypass the Government, our representatives and the community?
- Proposed location is ~100m from Rochdale/Alfred Rd traffic lights and sits in a blind spot for west bound traffic due to the bend in Alfred Rd. This is where traffic must merge
- Alfred Rd/ Butler Avenue intersection is hazardous – particularly in peak hour. In the last 3 months, there have been 3 serious and life threatening accidents along this strip
- The application does not comply with the WA Planning Commission guidelines which stipulate:
 1. Cannot be close to major road intersection where there may be safety concerns
 2. Access from a local street must not impact the amenity of the area

3. Must be located in a commercial, recreation, community or education node

- Traffic assessment report done by the developers does not address safety and local, amenity impact.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Debbie and Robert Banfield

From: Rina Diffen <diffendale@iinet.net.au>
Sent: Thursday, 28 November 2019 12:28 PM
To: Town of Claremont
Cc: minister.saffioti@dpc.wa.gov.au
Subject: Proposed Development of 162-164 Alfred Road, Mount Claremont

Categories: Emma

To whom it Concerns,

I'd like to express my concern over the proposed development of 162 - 164 Alfred Road in Mount Claremont.

The road traffic conditions on that part of the road are already difficult to deal with in the mornings and even more treacherous in the afternoons with the sun in your eyes. The combination of a bend in the road causing a blind spot, traffic congestion from the near by traffic lights - 100m away, an incline, plus sun, making navigating that strip stressful and often dangerous.

To then introduce heavy traffic at peak hours, from a Public facility, entering Alfred Road on the same blind spot bend, along with previously mentioned other challenges is alarming. Not to mention the safety of all the children involved with a child care facility.

The impact of the additional traffic from Aria appartments has already impacted significantly and negatively, on the peace and general amenity of the area.

Surely a development of this nature should be in a safe area designated for commercial services, not smack bang in the middle of a residential area already strained by development and dealing with a busy, dangerous stretch of road?

Please object to this development proceeding and uphold the decision of The Town of Claremont and the State Panel, back in July 2019. The local residents and many commuters who use Alfred road expressed their concerns earlier in the year. I'm confused as to why we are all being ignored.

Kind regards
Rina Diffen

Attn: Planning and Development
City of Claremont
toc@claremont.wa.gov.au

To whom it may concern,

RE: PROPOSED CHILD CARE CENTRE - 162 & 164 ALFRED ROAD, SWANBOURNE

I support the application for the proposed child care centre at 162 – 164 Alfred Road, Swanbourne WA. I have a young family and have noticed that there is a shortage of childcare centres in the area. This is a much needed development for the community.

Regards,



Matthew Bruce – 0423 387 614
Director
Wallace PM

From: Henry Vu <Henry.Vu@colliers.com>
Sent: Thursday, 28 November 2019 2:20 PM
To: Town of Claremont
Subject: Attn: Planning and Development: 162-164 Alfred Road Swanbourne, Proposed Childcare

Categories: Sage

I support the application of the proposed child care centre.

The area is currently under supplied and the location makes sense for access.

Regards

Henry 0422318025

Henry Vu
Manager | Investment Services, Healthcare and Retirement Living Dir +61 8 9261 6652 | Mob +61 434 659 910 | <[A href="https://vcard.colliers.com.au/default.aspx/Henry.Vu@colliers.com">vCard](https://vcard.colliers.com.au/default.aspx/Henry.Vu@colliers.com)
Main +61 8 9261 6666 | Fax +61 8 9261 6677 Henry.Vu@colliers.com

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This notice should not be removed.

From: Ted & Rhoda Walker <ejwalker@bigpond.com>
Sent: Thursday, 28 November 2019 10:54 PM
To: Debbie Hill; Minister.Saffioti@dpc.wa.gov.au
Subject: Re: Childcare proposal Swanbourne - Objection

Town of Claremont/ Minister Rita Saffioti

SUBMISSION AGAINST THE REVISED PLAN FOR CHILDCARE CENTRE, SWANBOURNE.

I have read available information about the amended submission for a proposed very large Childcare Centre at 162 & 164 Alfred Road, Swanbourne, and still consider this to be far too large and unsuitable a use for this suburban residential area.

Another major objection is the very adverse impact this project will have on already busy roads (Alfred, Rochdale, Myera, Butler, Narla Mayfair and nearby streets), especially with the very heavy use at peak hour School times, with so many schools and colleges in the vicinity and the heavy traffic flow towards Perth City and other suburbs. It is already very difficult and dangerous to exit these streets, especially to make right-hand turns, when driving east or west looking into the rising/setting sun.

Sincerely

Rhoda Walker

71 Strickland Street, Swanbourne 6010. Phone 9384 5460. Email ejwalker@bigpond.com;

From: [Debbie Hill](#)
Sent: Monday, May 20, 2019 4:09 PM
To: [Ted & Rhoda Walker](#)
Subject: RE: Childcare proposal Swanbourne - Objection

Dear Ms Walker

Thank you for your submission in relation to the proposed child care centre at 162 & 164 Alfred Road, Claremont.

Your comments will be taken into account during the assessment of the proposal and report preparation. We will be in contact again when the application is to be referred to Council for consideration.

Should you have any queries, please do not hesitate to contact us.

Kind regards

Debbie Hill
Administration Officer Planning & Development



Number One Claremont
308 Stirling Highway, Claremont WA 6010
PO Box 54, Claremont WA 6910
ph +61 8 9285 4300
www.claremont.wa.gov.au

Andrew J Towler
8 Butler Ave
Swanbourne
WA 6010
Email: ajtowler@y7mail.com
Tel: 0405 170318

29 Nov 2019

Dear Ms Previti

Subject: 162 & 164 Alfred Road, Swanbourne Child Care Center

I write with reference to:

- Your letter 01PEA/19/180-DA2019.00047 dated 06 May 2019
- Meyer Shercore Plan dated February 2019
- Transcore Transport Impact Statement dated April 2019.
- My letter dated 19 May 2019

And subsequent correspondence:

- Your letter DA2019.00047/DR 161 of 2019 dated 22 Nov 2019
- Meyer Shircore Plan
- Transcore Transport Impact Statement – Revised dated Nov 2019
- Herring Storer Environmental Acoustic Assessment dated Nov 2019

I wish to lodge my formal objection to the referenced development for the reasons as set out below

My original objections were premised on:

- Location/traffic
- Danger to pedestrians using Butler Ave for access/egress including Claremont Lake
- Parking
- The unsuitability of a commercial business in a quiet residential street

The Town of Claremont denied the application on the basis of:

- Detrimental to amenity fo residents
- Increased traffic
- On site parking
- Incompatible architectural style
- Not within a preferred zone
- Sire of insufficient size
- Flawed Traffic Impact Statement
- Noise

Having now reviewed the resubmitted application I note no material changes to the proposal that would overcome neither mine norToC's objections above.

It remains that:

1. The location of the proposed child care centre remains exactly at the point where the traffic going West merges from two lanes into a single lane. At peak hours when the centre will be

at its highest level of activity then the traffic turning right after having come down Alfred Road from West Coast Highway will pose an accident risk and certainly impede the flow of traffic. Traffic going East towards West Coast Highway will likewise impede traffic flow. Moreover when cars pull out of Butler Ave they will pose an accident risk and impede flow. Also note that the traffic on the road heading East is borderline for two lanes at this point and hence more obstruction to traffic with commensurate accident risk. Traffic on Alfred Road is heavy at peak hours and will only be detrimentally affected by this proposed development.

2. Butler Ave still has no pedestrian pavement but is used by local residents as an access means to Claremont Lake, which is fine given the street is a one way with minimal traffic. People cross directly opposite Butler Ave and to expect them to do so at Myera Street is nonsensical. The child care centre will impact this use of Butler as a means of Access to Claremont Lake and would I suggest give rise to accidents. Please bear in mind the issue that arise at school drop-offs with mothers driving SUV's consider this in a suburban street with no through access and no real pavements.
3. The Transport Impact Statement itself advises that there are insufficient parking spaces to the proposed development but suggests that public transport will be used by workers – this is nonsense. Workers will use cars if they have one and hence the hypothesis is flawed in this and many other areas.
4. Lastly this development is a commercial business which has no place in a residential area regardless of its intended use – it is not a community benefit but an inappropriately sited development in a quiet residential area.

I trust the above demonstrates the total unsuitability of this development for the proposed location and must firmly request ToC to deny planning permission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andrew Towler', with a stylized, cursive script.

Andrew Towler

28th November 2019

RE: Proposal for Childcare Centre, Alfred Road

Planning and Development

PO Box 54

Claremont WA 6910

Email: toc@claremont.wa.gov.au

Dear Planning and Development,

Our family home at the south end of Myera Street is a block away from the proposed childcare centre on 162 & 164 Alfred Road, Swanbourne. We are deeply opposed to the revised application. Indeed, we are opposed to any proposal for these lots, except residential housing as it is currently zoned for, as there is a high demand for housing in this area.

The proposal is legally and morally wrong. The proponents have used the oldest ploy in the development book: buy the land on speculation and then request rezoning to suit their purposes and make a profit, not to enhance and better the community. The commercial centre is not wanted in this residential neighbourhood.

We have the following concerns regarding this proposal:

Residential Zoning

Residential zoning is created to help make neighbourhoods quiet and beautiful and prevent them from being inappropriately developed, as proposed here. If approved, this proposal could also set a precedent for further commercial development in the area that is not in keeping with the residential character. The proposal would erode the beauty, the peace and the green space in the area.

The lots in question, totalling 1850m², are currently zoned R20 for residential housing (20 houses per hectare), which means 3 houses (and potentially 4) could be built on this site. We do not support a change in the code to enable a commercial enterprise. We would support 3 houses being built on the site, which ideally would limit the footprint of the houses, the number of cars, the amount of parking space, while maximising the garden/green space and trees.

Traffic and Noise

The traffic report is difficult to read and unconvincing. It seems the traffic volumes are underestimated. Given the number of students and staff proposed, we would estimate an additional 65-78 cars at each morning and afternoon peak hours. Most of this traffic is likely to occur within a one-hour period. The added traffic noise and car door slamming will not be appreciated by the adjacent residents, particularly in the early morning. It will make Alfred Road in this area more dangerous, adding to waiting times to enter Alfred Road, that can already exceed 2 minutes.

Amenity

A commercial enterprise is not conducive to a residential area. Potentially a few good families and neighbours will be lost from the area. Approximately half of the development will be a car park. This is dead ugly for a residential neighbourhood and not welcome. It will also increase runoff. There does not seem to be any plans to retain the rainfall on the site for the remaining trees and surrounding vegetation.

Environment

It is hard to tell from the plans how many trees will be destroyed. We estimate at least a dozen. And we do not trust that the trees marked to be retained will actually be retained. Tree retention on development sites in Perth is appalling. With climate change and a drying climate every effort should be made to retain and increase tree canopy, not destroy it. Tree and shade are vital for local cooling and improving air quality, mental health and well-being, as well as for Perth's unique wildlife, particularly insects and birds.

The latest proposal is fundamentally the same concept as the previous one which the community and the Town Council vehemently opposed. No changes will make it acceptable because this is a residential area, zoned for residential housing, not a commercial enterprise.

We would like the Council to completely reject this application and present a strong case to MWJDAP to request that the lots are developed for their intended purpose: residential housing with a design code of R20, preferably done in a beautiful and environmentally sensitive manner. We look forward to your response.

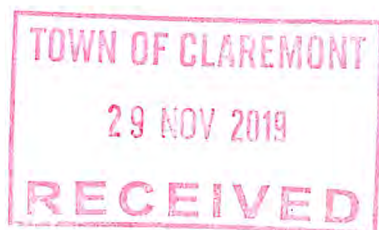
Sincerely,

Dr Paul Hardisty & Mrs. Heidi Hardisty

12a Myera Street
Swanbourne, WA 6010
spideyheidi@outlook.com
M 0416 614 696 (Heidi)

Email for Dr. Paul Hardisty: paulehardisty@gmail.com

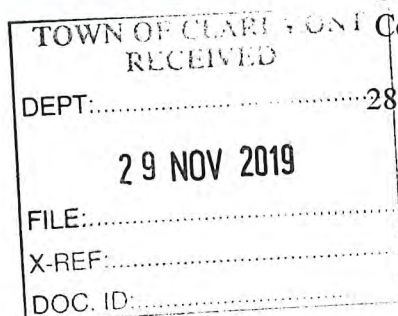
Email for Heidi Hardisty: spideyheidi@outlook.com



Trevor S. Lippiatt (owner/occupier)
Irene Lippiatt (owner/occupier)

5 Butler Avenue
Swanbourne, WA 6010

Contact email: te887928@gmail.com



Town of Claremont
Planning and Development
P.O. Box 54
Claremont WA 6910

Re: Revised Plans - Proposed Child Care Centre – 162/164 Alfred Road Swanbourne 6010

As the property owner/occupiers of 5 Butler Avenue, Swanbourne we wish to make a submission expressing deep concern and opposition to the proposed child care centre to be situated at 162 Alfred Road and 164 Alfred/Butler Avenue corner.

The reasons for our objection are as follows:

Residential Impact:

The proposal is for a large commercial (for profit) Child Care Centre located in a wholly residential area. This will impact unfairly on the quality of life of the residents of Butler Avenue, in particular, and surrounding residential properties.

The operating hours of the child care centre from 7.00am – with the probability of staff arriving at 6.30am – will cause unfair disturbance and noise to the residential home immediately adjacent to the entrance and car park bays. The 3 residential homes opposite the entrance all have front bedrooms facing Butler Avenue and will similarly be disturbed by the noise of cars, car doors and general noise of people talking etc. During the early morning hours of the winter months it will be necessary for the child care building and car park to be lit, again causing unfair disturbance to the adjacent home and the homes opposite with street facing bedrooms.

Dangerous Blind Corner Exit and Congestion:

Butler Avenue is a small residential cul-de-sac, entering/exiting at Alfred Road, and is a short distance from the Rochdale Road/Alfred Road intersection controlled by traffic lights.

The exit from Butler Avenue sits on a blind curve from the traffic lights at the Rochdale Road/Alfred Road intersection. Exiting right out of Butler Avenue at any time of day is hazardous due to the blind curve and vehicles travelling fast through the lights towards the West Coast Highway. **Vehicles frequently speed through the lights to avoid a light change. The revised plans now show a left entry to the carpark for cars travelling from the East. This entry is a short distance from the lights – cars slowing to enter increases the danger for cars travelling West through the lights. Cars using this entry will also obstruct the vision of cars waiting to exit left and right from Butler Avenue.**

This new entry crosses over a pedestrian pavement which is heavily in use during morning and afternoon peak hour traffic, with children walking/cycling to/from Swanbourne Primary School and pedestrians walking to/from the bus-stop situated between Butler Avenue and Narla Road.

This new entry just adds extra danger to an already busy and dangerous section of Alfred Road.

Noise Impact on a Resident's Right to Quiet Enjoyment of their property:

The revised building plans are for a double level building with upper level balcony play areas. The Plans show 5 Activity rooms – the Noise Management/Outside Play Time-Table seems complicated in the extreme and designed to confuse. It refers several times to provision for outside play for Activity Room 6 – this may be a typo error for Activity Room 3 – but it is not conducive to the accuracy or the understanding of this Noise Management Report.

The Noise Management Plan/Outside Play Timetable shows that in Summer, when residents are likely to have open windows, **between the hours of 7.00am and 8.00am**, there will be provision for **36** children playing at ground level and **19** children on the outside balcony level 2. **The noise generated by 55 small, boisterous children playing outside, adjacent to residential properties, can only be detrimental to the residents' right to the quiet enjoyment of their homes at this early hour.**

This submission is in addition to our original submission and is in response to the revised plans. There are other areas that are incompatible and will no doubt be covered by other submissions.

Signed: 
Trevor S. Lippiatt


Irene Lippiatt

Dated: 28th November 2019

From: Hella Hollyock <tenby149@gmail.com>
Sent: Thursday, 28 November 2019 5:14 PM
To: Town of Claremont
Subject: 162&164 Alfred Road Swanbourne Application for Child Care Centre

Categories: Emma

Hella Hollyock,
149 Rochdale Road,
Mount Claremont WA 6010.
Email: tenby149@gmail.com

28th November, 2019

Town of Claremont
Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Mt Claremont and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

I can't see any reason why we should have a child care centre in a residential area when there's plenty of space nearby in Stubbs terrace near the railway.

The rush hour traffic is already very bad. We live half way up Rochdale Road and the queue starts here every morning for cars turning right into Alfred Road and this is where you want to build a day care centre.

Old Mount Claremont has also unfortunately been re-zoned to 2 dwellings or more per block, which over a couple of years will increase the local traffic by even more.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Kind regards,

Hella Hollyock

From: Clinton Capelli <clinton@vectorlifting.com.au>
Sent: Thursday, 28 November 2019 5:52 PM
To: Town of Claremont
Subject: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Categories: Emma

Attn: Planning and Development

RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Dear Planning and Development,

I support the application for the Proposed Child Care Centre.

I have a two young children (3 month old and 3 year old) and have found shortage of child care centres (or available positions) in the area. I also cannot see any negative effects of such a development at this location.

Regards,

Clinton Capelli
0411 594 457

Clinton Capelli
Mechanical Engineer



43 Spencer St, Cockburn Central, WA 6164 | Po Box 3165, Success WA 6964
Phone: +61 8 9417 9128 | Fax: +61 8 9417 4105
Website: www.vectorlifting.com.au | Email: clinton@vectorlifting.com.au



From: Nick C <njpcoster@gmail.com>
Sent: Thursday, 28 November 2019 6:02 PM
To: Town of Claremont
Subject: Re: Childcare centre at 162&164 Alfred Road, Swanbourne

Categories: Emma

to whom it may concern,

Re the proposed child care centre at 164 Alfred Rd, Swanbourne, I support the application for the following reasons;

- I only believe this could benefit the community with no negative effects
- it's great to see kids out and about enjoying themselves And learning great life skills which will only benefit the community
- the small increase in traffic will be outweighed by having such a great resource in this area

Regards,
Nick Coster
0488083955

From: Sandra Neal <sneal21@hotmail.com>
Sent: Thursday, 28 November 2019 6:42 PM
To: Town of Claremont
Subject: New Development

Categories: Emma

Dear Town Planner,

There has been a new development proposal for an 80 person childcare facility planned for 162-164 Alfred Road, Mt Claremont.

This commercial development would be most unsuitable right in the middle of established housing and only a few metres from traffic lights at corner Rochdale Road and Alfred Road. Also, the amount of pollution coming from increased traffic would be detrimental to the children's health.

Alfred Road already carries a heavy load and with extra traffic coming from Butler Avenue would dramatically add to the chaos and with children walking in all directions so close to the traffic lights, is waiting for disaster to happen.

Kind regards,

Sandra Neal
Mt Claremont

Sent from my iPad

To SAT
Referenc e
Childcare Centre
Alfred Road Swanbourne

Submission 76

From Owen Meeks
13 Butler Avenue
Swanbourne W.A.

I have looked at many charts and numbers which support the use of a childcare centre at that location but these numbers and charts would be in the favour of those who are paid for.

I have lived in the street since 1969 and had been witness to many changes to the suburb which favours the community.

In all the action and protests with paper warfare flying everywhere I just like to come down to some commonsense and logic as to the practicality of a childcare centre at that location with entry to and from Alfred Road which is a busy street with continuous flow of traffic throughout the day especially in the morning and evening's.

We who live in the street know the dangers that the company and effort to enter onto Alfred Road from Butler Avenue in these busy times. The main problem is if doing a right-hand turn you cannot see the traffic coming towards you because of the lay of the land and a curve in the road.

Through the years I have practised the art of seeing the top of the traffic lights waiting for them to turn red and then one would assume that no traffic will come through on your right but in this day and age is common for drivers to pass through the lights even on red and to do so they accelerate meaning they come around the corner a lot sooner than you can expect and both drivers get a fright as to how close an accident could have been.

So those leaving the centre not knowing the risk it would be expected very soon for an accident to occur.

When looking at the methods all ways that traffic would enter into the premises and at a point when cars are also leaving there will be a natural banking of cars which wouldn't take long to get to Alfred Road and interfere with that traffic.

On the other hand I can see drivers taking the easy way and parking on the verge and walking the children in and then to turn around they would drive down to the bottom of Butler Avenue and used as turning circle.

My concern is that an amount of traffic and that we as residents of Butler Avenue will now have to interact with 40 to 50 cars each day.

Clearly this suburb or area is zoned as residential and as such it should remain residential without somebody pushing the way in with a commercial opportunity something which will affect everyone from those using Alfred Road and in particular Butler Avenue at the top where the interference for the homes directly across and the noise factor of cars moving in the and children and adults talking. There is no reason. Why this area needs a childcare centre and in particular why you would put one on a

busy road where drivers will cause problems coming in and going where it wouldn't take long for an accident to occur in a child to be injured.

Therefore it doesn't matter what documentation is put forward to support the case of a childcare centre when it is a residential area and the movement of traffic will simply be pathetic and dangerous.

Before anyone gives an approval they need to come out and look at the site and look at what they are given the approval for.

This street like Myera Street as a unique character of being a no through road with the minimum traffic and this holds our residential prices at a fairly high level and with a childcare centre see our investments will definitely decrease especially those living across the road where the interference is that a person's front door.

So therefore when looking at all the facts and figures to support a childcare centre it would be necessary to look at the effect it will have on us the residents of the street. We will have further cast are content with will have noisy cars driving up and down the street and the bottom line is everybody as a resident is protected with the value of the property with the areas being zoned as residential living commercial interests to go to those areas which the Council has set aside for business interests.

So is with this logic is cars turning left into the driveway coming across cars leaving the premises and having to slow down to a crawl with other cars coming in behind it won't take much for the traffic to float back onto Alfred Road, then those wanting to right into Butler Avenue will simply have to wait until the queue of left-hand turners reduces and provides an open space.

It is unfortunate that some people have the arrogant attitude of what they do is what they get without considering the effects the actions are having on other people.

I find it interesting where initially it was said to be 100 children but then for the benefit of SAT another report came out saying 68 children then another one came out reporting 80 children so the question is how many children are they committing this program for and are they the types where if the centre is set up and running after a few months they simply sell off the commitment and the problems are no longer there's. If by some chance this application is approved then the council and the residents would need to have a closer look at the building plans to make sure they are accurate.

That is all I have to say at the moment, so as you see on the after a scientific resolution just common sense and logic and the understanding of others that this project should not doing further for the simple reason to many kids the area would be too dangerous and I certainly hope that the Pope staff can also realise the benefits of this new system which will enable a person to correct the club imposed throughout the year where it becomes part of the bedroom so for now I had nothing more to say.



Entrance

Parking at top of hill



Entrance

Entrance

Parking at top of hill

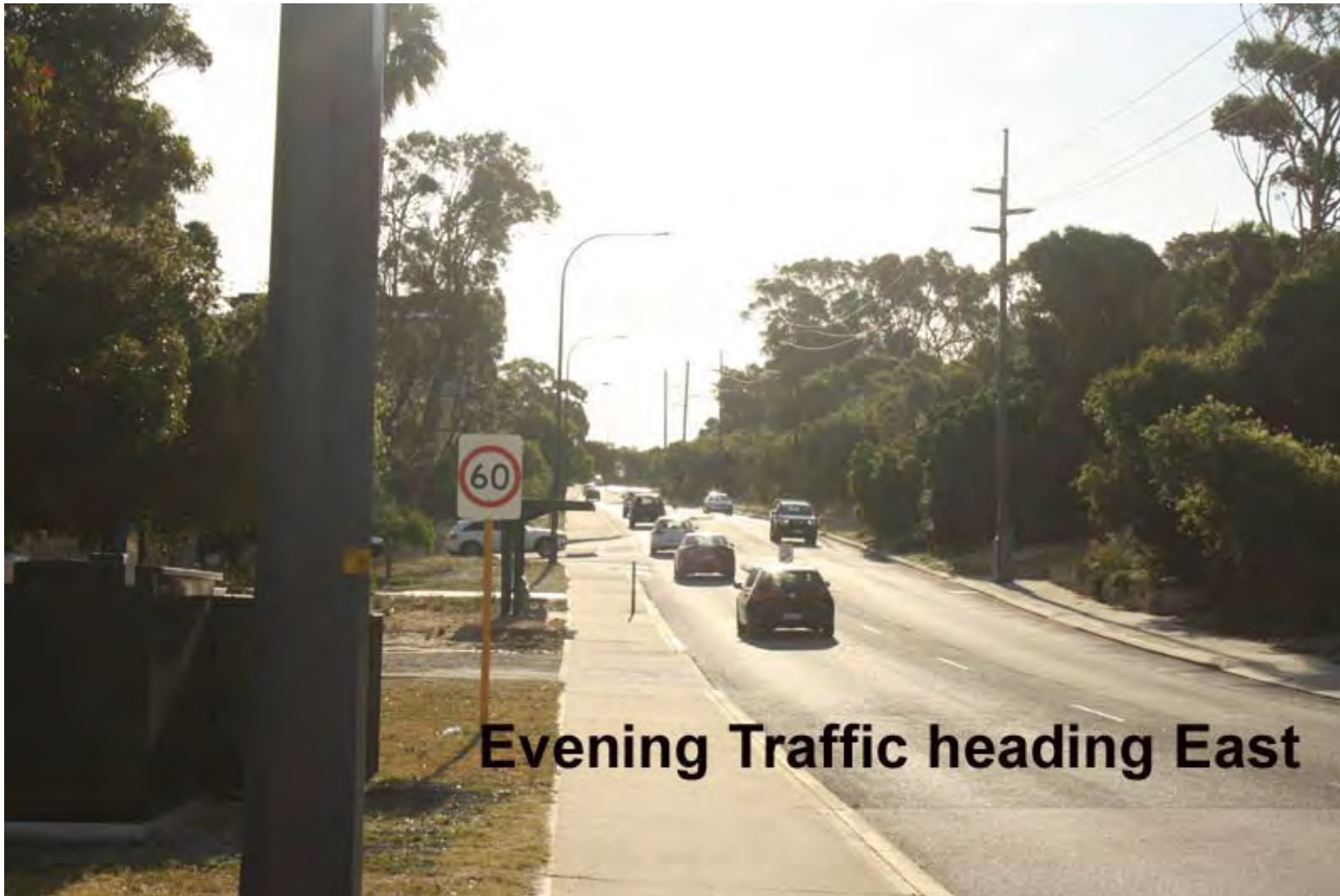


Entrance

Front Door from first house in street



Evening Traffic heading East



Evening Traffic heading East



evening traffic heading east

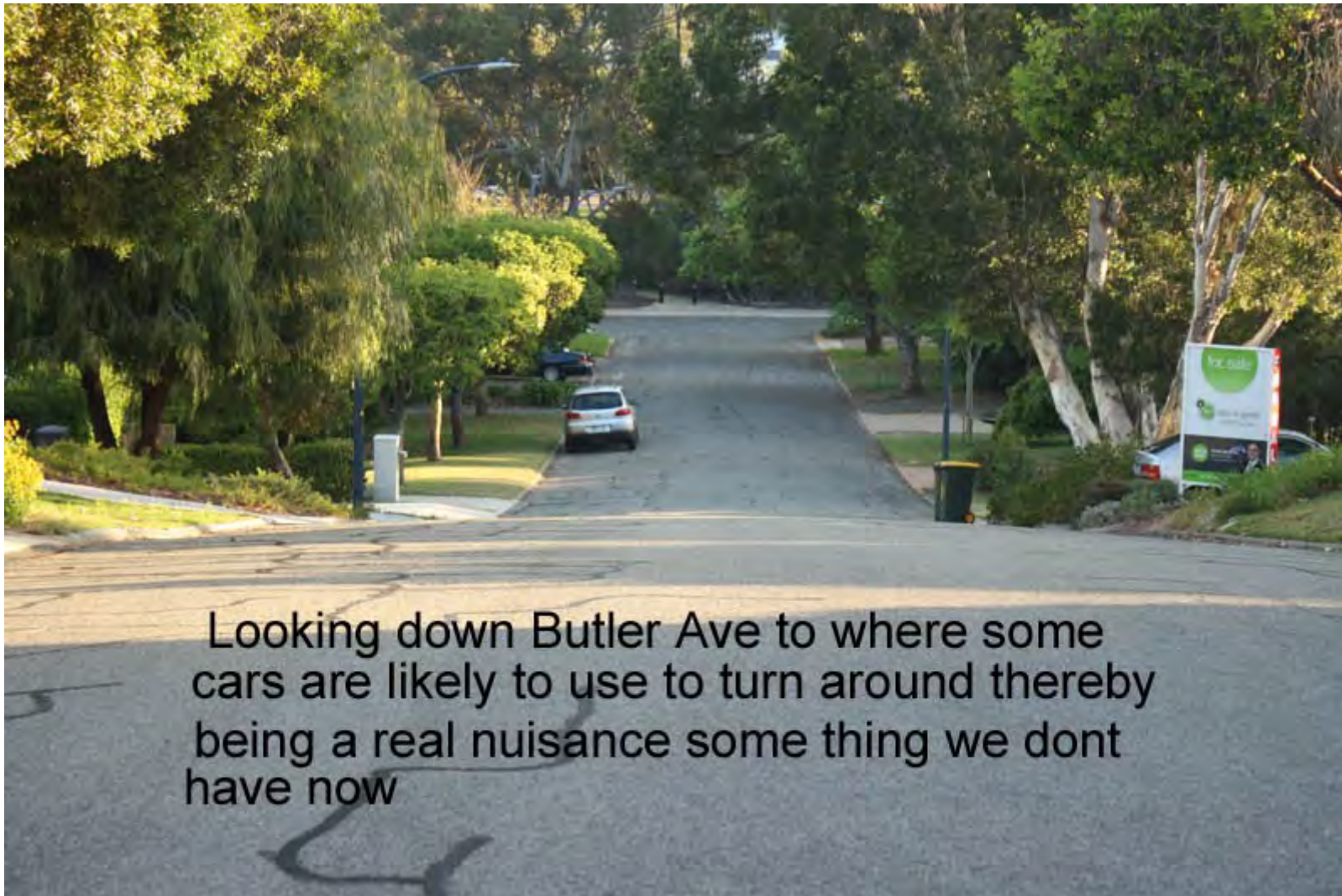


Entrance

Entrance

Parking at top of hill





Looking down Butler Ave to where some cars are likely to use to turn around thereby being a real nuisance some thing we dont have now

From: tiffany currall <tcurrall@aapt.net.au>
Sent: Thursday, 28 November 2019 8:59 PM
To: Town of Claremont
Subject: Concern about the revised application for 162 & 164 Alfred Road Swanbourne – Proposed Child Care Centre.

Categories: Emma

Tiffany Currall

170a Alfred Rd

Swanbourne WA 6010

tcurrall@aapt.net.au

28th November 2019

Planning and Development

PO Box 54

Claremont WA 6910

Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident at 170a Alfred Rd Swanbourne and I am writing on behalf of my family to express our concern about the revised application for 162 & 164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area.

We strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for our objection are as follows:

We have some serious concerns as listed below with regards to, but not limited to the following

Safety

The proposal is to have a large day care situated in a residential area on the corner of a very busy arterial road and an uncontrolled residential street (Butler Ave).

The safety of both clients and existing residences will be put at risk in accessing Alfred road during the peak times, with the access to Butler Ave being on a blind corner.

In the morning traveling East the traffic will be attempting to turn across traffic traveling West, with the sunlight directly in front and within the time frames of the school drop offs.

The reverse will be the case when picking up children from the proposed day care centre, with traffic being held up whilst traveling west on a blind corner and driving into the western sun.

The safety issues are not limited to vehicular movements but also pedestrian foot traffic using the existing foot path down southern side of Alfred road, particularly during school times.

Amenity

We feel the amenity of our area would be put at risk with the approval of such a large commercial venture.

This would include a lot more noise, and traffic, and have an adverse effect on the amenity of the neighbourhood.

Traffic

It is suggested the proposed Day-care will have 65 children, the majority of the children will be dropped off by car and there will be full time staff members this would equate to around 140 additional movements each day without taking into account delivery trucks, additional visitors, educators, or cleaning staff.

Given the experience of the Aria complex and the very negative affect that had on traffic flow and the proposal is in a very concentrated school zone, including Swanbourne Primary, John XXIII, Graylands Primary, Scotch, Christchurch and Shenton College, the main time that the centre will be accessed is during the busiest times of day.

Alfred Road is already struggling to flow during the peak periods and has not been designed in such a way to accommodate additional traffic.

Whilst it may be suggested that the drop offs may be staged or buses used, the reality of it is, that most parents will drop off the children whilst making their way to work.

That along with turning across the traffic and slowing traffic in both ways is recipe for disaster.

In approving the proposed development, the persons vested with such responsibility, have an ongoing moral and ethical duty of care to ensure the safety of all parties.

Given the area is already serviced by 3 large day-care centres and a number of smaller or family day-care centres, it could be safely suggested the majority of the clients will come from the surrounding suburbs and in doing so add to the traffic on Alfred road and in the overall suburb.

Zoning

The properties are zoned R20 indicating a single residential zoning, in approving the proposed development would require a change of the zoning of the properties and again affecting the amenity and resale value of the adjoining properties.

Precedent

in changing the zoning of the property, it sets a dangerous precedent which serves to undermine the effectiveness of the Town Planning Scheme.

Parking

Whilst there are a number of parking bays proposed and a drop off zone, my professional experience in these matters would suggest a lot of the parents would be staying to settle the children in, given the age of the children, this would result in a lot of them requiring parking in a concentrated time period, particular during the drop off.

This would inevitably result in parking in Butler Ave and possibly on the verge of Alfred road adding to the congestion. One would only have to look at the drop off and pickups at Swanbourne Primary or North Cottesloe to gauge an insight into the issues attached to such a large centre.

It could result in a duplication of the Strickland street precinct during the busy periods.

Noise transfers

Whilst the sound of children playing is a normal part of life, having 65 children in a very small area is not and is not in keeping the low R20 single residential zoning.

Duplication of services

Whilst the applicant is making a commercial decision for a day care centre, (let's face it they are not doing it for a community service) it could be strongly suggested that the area already has an oversupply of day care centres including Jelly Beans (Swanbourne), One Tree (Swanbourne), Annie's Play School (Mt Claremont), Tiff's House (Swanbourne), Tiny Beez (Alfred road) Camp Australia (Swanbourne Primary) Smart Start (Swanbourne), Jellybeans (Mt Claremont), Challenge Stadium Day-care, along with pre kindy at Scotch College, pre kindy at Christchurch Grammar and an Early Learning Centre at MLC (6 months to 4 years) just to mention a few.

Due process

The developer's action in making the application to the Metro West Assessment panel in lieu of going through the normal due process via the Town of Claremont indicates, in my opinion, the deceptive nature of the applicant in order to circumvent the normal advertising period and professional under structure of the Town.

Through previous experience, the developer may have learnt that making applications through the Town or City did not represent their best commercial interest and have opted to have it dealt with through MWJDAP.

Thank you again for the opportunity to comment on the proposal and hopefully contribute to a positive outcome for the community and not just one developer.

We, as a family living on this extremely busy street ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. We look forward to your response.

Sincerely,

Tiffany Currall

From: Xavier Jennings <xjennings@hotmail.com>
Sent: Friday, 29 November 2019 4:49 AM
To: Town of Claremont
Subject: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Categories: Emma

Attn: Planning and Development
RE: 162 & [164 Alfred Rd](#), Swanbourne. Proposed Child Care Centre

I support the application for the Proposed Child Care Centre.

I believe the development will be an added benefit to the community

Regards,
Xavier Jennings

Sent from my iPhone

From: Ben Tana <Ben.Tana@colliers.com>
Sent: Friday, 29 November 2019 7:19 AM
To: Town of Claremont
Subject: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Categories: Emma

Attn: Planning and Development

I am a resident of the area and I support the application for the Proposed Child Care Centre.

I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.

Regards,

Ben Tana
0412721888

Ben Tana

Director | Retail Investment Services
Investment Services

Dir +61 8 9261 6646 | Mob +61 434 659 807 | [vCard](#)

Main +61 8 9261 6666 | Fax +61 8 9261 6697

Ben.Tana@colliers.com

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This notice should not be removed.

From: Graham Pember <grpember@outlook.com.au>
Sent: Thursday, 28 November 2019 10:16 PM
To: Town of Claremont
Cc: Minister.Saffioti@dpc.wa.gov.au
Subject: PROPOSED DEVELOPMENT 162 - 164 ALFRRED RD

Categories: Ruchira

Dear Sir/Mdm

We are residents in Mount Claremont and wish to register our objection to the above development for the reasons outlined by others namely:

- The application does not comply with WA Planning Commission Guidelines (see other objections)
- The Traffic Assessment report done by the developers does not address safety and local amenity impact.

In addition to these matters it should be noted that:

- The application has followed the established process and been rejected. It is difficult to accept that it can be considered by another authority with the chance it may be approved. There is no sense in having a process and then allowing it to then be overridden at will.
- This proposed development is not suitable for the area as it is a residential with no other established businesses. This should not be allowed to create a precedent for other developments that will impact on the amenity of the total area.

Thank you
Graham Pember
62 Adderley St
Mt Claremont

e-mail: gerardpatrickdaly@gmail.com

e-mail: kasiadaly@gmail.com

Gerard & Kasia Daly
170 Alfred Road,
Swanbourne,
WA 6010

Tel: 0481 000 143

Nov 26th 2019

REF: Revised Application for Proposed Development at 162 Alfred Road

Dear Sir/Madam,

Further to your recent registered letter notifying us of the revised proposal for a proposed development at 162/164 Alfred Road, Swanbourne I am writing to submit our **Objection to this revised proposal.**

Having read the revised proposal we see nothing which mitigates the issues we have previously identified as the grounds for our objections. We applaud the town of Claremont for rejecting this proposal. This revised proposal pays lip service to a business development while completely overlooking the safety and logical element which underpins a natural objection to such a proposal.

As a resident adjacent to the proposed development site we continue to see traffic congestion, chaotic behavior from drivers and observe near misses as two lanes merge into one lane travelling west bound from the traffic lights at the junction of Alfred Road/Rochdale Road junction adjacent to this proposed development.

I would like to reiterate that the right hand lane Westbound at the traffic lights at Rochdale road should be made a right turn lane only (regardless of this development) due to issues at this junction. Placing an entrance to a Child Care Center within a few meters of this junction is madness.

We are not happy that this issue has been progressed for consideration again following the Town of Claremont's rejection of its proposal. Furthermore we are provided with barely 5 business days' notice to respond. These timeframes themselves are questionable and reflect the tactics used to attempt to progress something that the majority and local government have clearly already stated their objection to.

A summary of highlights from this revised proposal to supplement our previous objections (which still stand)

- Adding to the current levels of traffic heading Eastbound in the morning, having increased levels of traffic travelling eastbound queuing on Alfred Road to enter Butler Avenue while traffic queues at Butler Avenue to re-enter Alfred Road to continue to travel eastbound is ridiculous and multiple disasters waiting to happen. I often have to wait a long time to enter Alfred Road to travel eastbound. This will certainly result in accidents.

- Assumptions are being made about where clients will come from, how they will travel to and from the day Care Centre and at what times etc.,

These projections are largely unsubstantiated with a view to justifying this business development with disregard to common sense

- This site is an unsuitable location for a child care facility but this is being overlooked in the business interest. This is a residential area with children and adults walking to school, walking their dogs etc.

- I am also given to understand that this proposed development breaches the WAPC Planning Bulletin 72/2009 with multiple violations. This in itself would be a reason to reject this (revised) proposal.

- Insufficient parking available at the facility which will exacerbate the traffic / parking issues in the area / poor visibility on Butler Avenue and exiting to Alfred Road

- Multiple other child care services in the area - This development is far from necessary in principle anyway

- Inadequate parking is explained away with fantasy detail around a public transport infrastructure that does not support its model and is unsubstantiated.

- Favorable traffic studies with a lot of content in which there is conjecture and sophistry designed to project a business proposal with no regard to safety and common sense - Modelling that tells us clients will exit West (Assumption) - highly unlikely.

As per previous....

There are a number of negative factors which can be listed in our objection to this proposal but the most important and obvious objection is on the grounds of **safety**.

The current levels of traffic on this part of Alfred Road are very high at peak times and we, as residents, find ourselves waiting up to five-ten minutes in the morning trying to gain access to Alfred Road from our drive way. All it needs is one of the many proposed new car movements to attempt to turn right into Butler Avenue travelling East on Alfred Road during peak morning time to back up the traffic for a significant amount of time. The proposed level of increase to traffic as a result of this development would be simply untenable, dangerous and result in gridlock.

The site of the proposed development is directly adjacent to the intersection of Rochdale and Alfred Roads. This junction is a bottleneck during peak morning times and is compounded by the fact that in both Eastbound and Westbound directions on Alfred Road two lanes merge into one. In the Westbound direction on Alfred Road, the section of road immediately outside the proposed development site has a road traffic sign indicating traffic should merge. It is not, therefore, a suitable place to host a large number of increased traffic movements and parking.

Even at the current traffic levels, the two lanes that are outside the proposed development site at the traffic lights at the junction of Rochdale and Alfred Road should be segregated so that the left lane must turn left in the Eastbound direction and on the opposite side of the junction the right lane must turn right in the Westbound direction to force traffic to merge in a controlled manner before reaching the traffic lights. I have observed on many occasions reckless drivers attempting to overtake cars at this merge point and also on occasion I have experienced cars slam on the breaks behind me when I turn into my driveway. Despite indicating and slowing down my car in a controlled manner other drivers are not expecting traffic to turn in off Alfred Road having just traversed this junction. The proposed development site is even closer to this junction and will almost certainly result in accidents should the proposed new development go ahead with 90 child spaces and 13 staff requirements being allowed to proceed. Service vehicles will also add to this dangerous mix.

The traffic report attached to the application was favorable to this proposal (as expected) but failed to identify or analyse this adjacent junction of Alfred Road and Rochdale road. It appears to aggregate statistics and figures while deliberately focusing on the cul-de-sac of Butler Avenue and its intersection with Alfred road while choosing not to mention the very close proximity of this proposed site's position to the Alfred and Rochdale Roads intersection. Furthermore there is no mention of two lanes merging into a single lane at this portion of the road.

Another factor in this proposal which will compromise safety is parking and a severe lack thereof. Further to the proposed increase in traffic in this part of Alfred Road the report admits there is not sufficient parking to cater for this proposal and uses 'guess estimates', projections and assumptions to attempt to sugar coat this fact. This means there will be cars parking anywhere and everywhere. We have observed this first hand during the recent development of the Aria apartment block in the area. Drivers believed that any free space of ground is free reign for parking and on a number of occasions my wife and I have experienced close misses with drivers who park on the verge outside our home (driving behind a bus stop!) and attempting to exit on to Alfred Road by crossing our driveway. This verge was previously coated with mulch at our expense and cared for but now is in a state of disrepair as a result of the above.

Living next to the proposed development site and given that this section of Alfred Road is where the width of the road begins to widen we find drivers doing U-turns and parking on our verge and driveways to do drop offs for the bus stop immediately outside our property. This proposed development will see a tenfold increase in people needing to park but having nowhere to park and using our driveway and the verge behind the bus stop outside our home as a car park. Butler Avenue also has a steep incline and will become dangerous as cars turn into the cul-de-sac and desperate to find parking scan the length and breadth of the road. Double parking and two way traffic with un-announced stopping of vehicles and passengers with children doing drop offs in the middle of the road all make for accidents waiting to happen.

I received a registered letter inviting me to respond to this proposal on May 8th 2019 with a deadline of May 21st 2019. I found this process of communication a little too hurried for my liking with no further consultation or announcements within the community. Indeed, when I walked passed the proposed development site there is no declaration of intent or mention of this proposal. I spoke to a neighbor who was not even aware of the proposed development. If I went on annual leave for any period of more than 14 days I would have run the risk of not having my say in these proposals due to this fast tracked process.

Anyone with any common sense would agree with the dangers highlighted in this objection and so I am a little suspicious that the process is being facilitated using the least informative and quickest path. I am also concerned that the town planning process allows for the virtual circumvention of the Town of Claremont by addressing the application to a different body who are most likely not as familiar with these concerns.

Why no signs on the site of this proposed development and why a period of less than two weeks to voice concerns? I believe the Town of Claremont should be very wary of these proposals and another question which causes me to object to this is the matter of this being a residential zone and yet this is a proposed commercial development? Is there provision for re-zoning this property to facilitate such a development? I would imagine this property is zoned residential for this very reason.

Finally, there are other factors which will result in a negative outcome for the environment surrounding this proposed development should it be allowed to go ahead. Namely, a major increases in noise levels, pollution, congestion and a reduction in the value of the surrounding residential properties.

For all the reasons listed above, we strongly object to this development being approved and would appreciate a thorough and timely consultation process to ensue as a result.

Yours sincerely,

Gerard and Kasia Daly

From: Nick Lewis <nick@apdprojects.com.au>
Sent: Friday, 29 November 2019 8:35 AM
To: Town of Claremont
Subject: RE: 162 & 164 Alfred Rd, Swanbourne.

Categories: Emma

Attn: Planning and Development,

RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

I support the application for the Proposed Child Care Centre. I believe the development will be an added benefit to the community.

Nick



Nick Lewis
Senior Development Manager

Level 3, 468 St Kilda Road, Melbourne VIC 3004

T 03 9804 5885 E nick@apdprojects.com.au M 0402 259 600

apdprojects.com.au



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Julien and Susannah Flack

1 Butler Avenue,
Swanbourne, WA 6010
Mob: 0438 845 063
julienflack@gmail.com

29th Nov, 2019

Attn: Planning and Development

Town of Claremont

Re: Commercial Development at 162-164 Alfred Road

To whom it may concern,

We are writing to respond to the revised proposal for the proposed child care centre. The revised plans are not acceptable as they do not address a key issue relating to the location of the driveway (crossover) on Alfred road.

Specifically, the plans are in contravention of Australian Standards for a commercial development on this site. At great expense the local residents of Butler Avenue have been forced to engage independent and unbiased traffic engineers, Cardno, as Transcore analysis is clearly lacking in a number of areas, including a failure to address the crossover issue.

Cardno has reviewed the location of the proposed crossover in accordance with the AS2890.1 – 2004 – Off-street car parking standards. The Australian Standard calls for a minimum stopping sight distance (SSD) of 45m for a frontage speed of 50km/h road for a non-domestic driveway. The revised plans show a distance of 40m. Therefore, the sight distance for the proposed location of the crossover for the proposed development is clearly in contravention of Australian Standard AS2890.1.

It is unfortunate that the developers have wasted everyone's time and money with a proposal that is clearly untenable at this location. Quite apart from the crossover issue it is clearly disingenuous to locate a childcare centre on a blind corner on a busy road in a residential cul-de-sac.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Flack', written in a cursive style.

Dr. Julien Flack

A handwritten signature in black ink, appearing to read 'Susannah Flack', written in a cursive style.

Mrs. Susannah Flack

From: R & M Owens <rowe1746@bigpond.net.au>
Sent: Friday, 29 November 2019 2:17 PM
To: Debbie Hill
Cc: council@nedlands.wa.gov.au; stopddswanbourne@hotmail.com
Subject: Proposed Dangerous Development at 12-164 Alfred Road
Attachments: Objection to 162-164 Alfred Road Proposal - 28th November 2019.docx; Stop the Dangerous Development at 162-164 Alfred Road.docx

Dear Debbie

Please find attached the following documents:

- i) Objection to 162-164 Alfred Road Proposal
- ii) Stop the Dangerous Development at 162-164 Alfred Road.

"Objection to 162-164 Alfred Road Proposal – 28th November 2019" is our response to the amended proposal by the applicant.

"Stop the Dangerous Development at 162-164 Alfred Road" is our response to the original proposal.

We wish both documents to be included in any further deliberations on this proposal.

Please acknowledge receipt of this email.

Thank you.

Rob and Mavis Owens
44 Mayfair St, Mt Claremont
Mob: 0414 899 134

Re: Objection to Amended Proposal to build a Child Care Centre at 162-164 Alfred Road

Further to our submission dated 21st May 2019, and in response to the applicant's amended proposal, we still strongly object to the development of a Child Care Centre at 162-164 Alfred Road.

(We note in the amended proposal that the number of children has been decreased by 25 although staff has only been decreased by 1. Perhaps the original number could be classified as an "ambit claim"!))

Our objections as outlined in our original proposal still stands (copy attached) however, we include the following in support of our objection.

Our main objection is two-fold:

- i) The area is zoned Residential and the proposal is a commercial-size Child Care Centre, not near any other commercial/recreational/community or education area and is situated on a high volume traffic road. And as such it contravenes regulatory requirements. In short it is 'smack bang' in the middle of an established residential area. And
- ii) The location of the proposed Child Care Centre is situated at a known hazardous road location with two streets (not quite aligned) entering a high volume traffic road that has merging lanes at this point and within less than 60m (approximately) of a busy intersection controlled by traffic lights.

The amended proposal does not address modelling of the Mayfair St (cul-de-sac)/Alfred Road/Butler Avenue (cul-de-sac) intersection. This is a traffic danger zone at all times and especially during peak periods and those dangers will be significantly compounded with additional traffic into and out of Butler Avenue.

The amended proposal does not adequately address the likelihood of queuing on Alfred Road with vehicles waiting to turn into the Child Care Centre. It assumes there will be no difficulty in accessing the Child Care Centre car park where practicality indicates there will be significant congestion in the car park at peak periods. Loading young children into cars is more time consuming than that of school-aged children so traffic movement within the car park will be slower than 'normal' traffic. Also, residents adjacent to the 'queue' area will be seriously impacted.

Further, the amended proposal does not address the problem associated with bus movements on Alfred Road during peak periods with a bus stop almost opposite where the new entry into the Child Care Centre is proposed.

Neither does the amended proposal address the likelihood of vehicles parking on Butler Avenue (particularly close to Alfred Road) so parents can dash in and pick up their child. The foreseeable traffic hazard for vehicles entering and leaving Butler Avenue is obvious. As well, Butler Avenue has the added problem of a cul-de-sac rather than a through road. Residents living in Butler Avenue will be seriously disadvantaged by this increased traffic flow.

The original proposal did not have local support with 107 submissions and only 5 in favour of the proposal.

The Town of Council Minutes (motion 77/19) was unanimous when it rejected the application for the original proposal, identifying areas in breach of planning recommendations and safety guidelines – not all of which have been adequately addressed in the new proposal.

The establishment of a commercial-size Child Care Centre does not fit the profile of the area and will have a significant negative lifestyle impact on surrounding neighbours and the community at large.

We request this submission together with our original submission be considered in any further deliberations.

Thank you.

Mavis and Rob Owens

44 Mayfair Street

Mt Claremont 6010

Tel: 9384 5759 Mob: 0414 899 134

To Whom It May Concern

Re: Stop the Dangerous Development at 162-164 Alfred Road

We are long term residents (50+ years) at 44 Mayfair Street, Mt Claremont and are very familiar with the traffic flow at the intersection of Mayfair Street, Alfred Road and Butler Avenue. Our section of Mayfair Street is a cul-de-sac, so this is our only entry and exit point.

Mayfair St and Butler Avenue do not align which makes this intersection quite hazardous. As well, Alfred Road is a main thoroughfare with considerable traffic daily. And at this particular junction in the road traffic travelling West is required to merge from two lanes to one adding to the complexity of the intersection.

Often one vehicle travelling East on Alfred Road will be waiting to turn right into Butler Avenue, while another vehicle travelling West on Alfred Road is waiting to turn right into Mayfair St creating a dangerous traffic hazard. Occasionally this will be an even greater hazard if there is a car waiting to exit either Butler Avenue or Mayfair Street.

We are surprised and anxious about the proposed development at 162-164 Alfred Road as this is right at the point that is already difficult to negotiate safely at all times, and especially at peak hours. Also, waiting on Alfred Road to turn right into Mayfair St one feels very vulnerable as traffic coming from behind is not expecting traffic to be stationary at this point. Much of this traffic has just travelled through the traffic lights at Rochdale Road – those lights are approximately only 100m from the intersection of Alfred Road, Butler Avenue and Mayfair St and frequently are expecting to accelerate.

The increased traffic and pedestrian flow from the proposed development (expected to be 300+ vehicles on week days) will make this already difficult intersection considerably more dangerous.

This is a most unsuitable area to establish any commercial development and especially a childcare facility with all the resultant vehicle and pedestrian traffic and additional noise.

We ask that you consider this objection in any future planning.

Thank you.

Rob and Mavis Owens
44 Mayfair St, Mt Claremont
Mob: 0414 899 134

Scott and Christine Henderson
23 Swanway Crescent
Swanbourne
WA 6010
scottchris1@bigpond.com

29 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Swanbourne (and a frequent user of Alfred Road), and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The reasons for my objection are as follows:

- Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.
- The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.
- Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.
- In the new plans, all cars will need to exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.
- The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons
 - It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and

Nedlands – however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east – compounding the traffic nightmare that will be generated.

- All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road) – the revised plans do not address this traffic chaos.
 - Figure 2 and calculations have no credibility as the assumptions are not real.
 - Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.
 - If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26....you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.
- The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.
 - The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.
 - Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.
 - The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –
 - Needs to be considered suitable from a traffic/safety point of view – it is not due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Avenue has limited visibility
 - Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road)
 - No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)
 - In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic)
 - Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.

- Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.
- Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.
- In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.
- If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue
- The intersection directly west – Narla Road and Alfred is extremely busy and is in close proximity. Narla / Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.
- Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.
- The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred.
- There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.
- Adding to further congestion and safety issues - the developer Transcore report on page 5 states that "waste collection **should** take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors." And "In this case it is also **recommended** that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose." – there is no guarantee from the developer that this will occur and how can the Council effectively police this?
- The developer makes an unsubstantiated claim on page 8 that " As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.
- The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required – why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

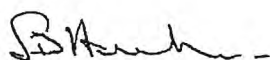
Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)

Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

➤ The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.

I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,



SCOTT HENDERSON

19th May 2019

Ref19519 1

Emily Dickson

40a Strickland St

Mt Claremont

RE: 01PEA/19/180-DA2019.00049 162 & 164 Alfred Rd
Swanbourne

By email (toc@claremont.wa.gov.au)

Dear Lisa,

Thanks you for your opportunity to comment on the proposed
Day Care Center as above.

We have some serious concerns as listed below.

Duplication of services

Whilst the applicant is making a commercial decision for a Day Care Center, (let's face it, this is not a community service) it could be strongly suggested that the area already has an oversupply of Day Care Centers including Jelly Beans (Swanbourne), One Tree (Swanbourne), Annie's Play-school (Mt Claremont), Tiff's House (Swanbourne), Tiny Beez (Alfred road, Claremont) Camp Australia (Swanbourne Primary), Smart Start (Swanbourne), Jellybeans (Mt Claremont), Challenge Stadium Daycare, along with Pre-kindy at Scotch College, Pre kindy at Chistchurch Grammar and an Early Learning Center at MLC (6 months to 4 years) just to mention a few.

Thank you again for the opportunity to comment on the proposal and hopefully contribute to a positive outcome for the community and not just one developer.

Yours Sincerely,

Emily Dickson
0407443042

From: Katie Weir <weirkatie@yahoo.com.au>
Sent: Friday, 29 November 2019 3:23 PM
To: Town of Claremont
Subject: Development at 162-164 Alfred Road

Categories: Emma

Hi TOC

I write to express my strong objections to this development. I drive past this site everyday in the morning and afternoon and am concerned about the impact of the traffic generated from the child care centre would have on traffic and pedestrians in the area. It is a dangerous intersection, particularly in the morning when eastbound traffic has sun in their eyes. The recent accidents involving 2 local children at the Rochdale Road intersection highlight the level of use by young children. There are many children crossing Alfred Road going either to Mount Claremont or Swanbourne Primary. I see many drivers taking risks to enter Alfred Road from Narla during peak hour so having traffic coming out of Butler will add to the risk to other drivers and pedestrians.

This is a residential area and it is not fair on the neighbouring properties to rezone these properties.

Thanks

Katie Weir
59 Strickland St
Mount Claremont
0422 123585

From: Lucy <lucy.caratti@bigpond.com>
Sent: Friday, 29 November 2019 4:08 PM
To: Town of Claremont
Subject: Attn: Planning and Development

RE: 162 & [164 Alfred Rd](#), Swanbourne
Proposed Child Care Centre

I am a resident of the area and I support the application for the Proposed Child Care Centre.

I do not believe that there is any danger associated with the childcare centre. There are many childcare centres that function perfectly well on much busier roads without any issues. There are multiple along Stirling Highway, for example.

I myself have a young family and found it very difficult to find childcare centres without long waiting lists. This can have a huge effect on families, particularly those with either one parent or with two working parents. In addition, children's development and socialisation is extremely important at this age.

I can't see how any negative will come from this development, only a positive effect on the community and their young children.

Regards,

Lucy Caratti
0438191083

Jane Muirsmith
11 Butler Avenue
Swanbourne WA 2019
jane@lenoxhill.com.au

29 November 2019

Planning and Development
PO Box 54
Claremont WA 6910
Email: toc@claremont.wa.gov.au

Dear Planning and Development,

I am a resident of Butler Avenue and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre.

This application is for a large scale, commercial childcare centre located in a residential area. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

Due to the scale of impact that this development would have – a number of residents have donated to get an impact assessment of this proposal. We have engaged Cardno, a leading traffic safety and engineering company to do this assessment. We provide their report, including a SIDRA analysis for your information and re-purpose. **Please help us stop this development.**

The reasons for my objection are as follows:

- > This proposed development will exacerbate the safety issues at this intersection.
- > Based on the Cardno SIDRA assessment, queues are expected to extend beyond the Butler Avenue intersection from the Rochdale Road intersection. The queues on Alfred Road would impact vehicles turning right into and out of Butler Avenue and will also impact the traffic operations of Alfred Road and the intersection of Butler Avenue and Mayfair Street. I draw your attention to the image provided in their report which proves the impact on Alfred Road in peak hour. **This image alone should provide sufficient evident for any person in authority to decline this unsafe development.**

Figure 5-3 Queue Distances



> Based on the expected volume of turning traffic at the Alfred Road/Butler Avenue intersection, the intersection warrants indicate a channelized right turn (CHR)/auxiliary right turn (AUR) treatment and basic auxiliary left turn (AUL) treatment should be provided at this intersection.

> The provision of a left in only access along Alfred Road is undesirable based on the WAPC and MRWA guidelines given the high traffic volumes along Alfred Street and safety concerns and visibility issues associated with the proposed site.

> Based on the revised drawings, the proposed crossover is located 40m from the Alfred Road intersection. Therefore, the sight distance for the proposed location of the crossover for the proposed development is inadequate in accordance to AS2890.1.

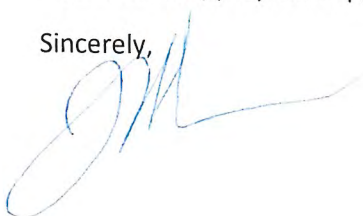
> **Cardno believes that the proposed development on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont will have a detrimental impact on the safety and traffic operations on Alfred Road and its intersection with Butler Avenue.**

> The integrity of the Transcore modelling needs to be questioned. See 5.1 of the Cardno report.

> In addition, one must question why the applicant, while reducing the number of children to attend this childcare centre, has increased the size of the centre since the original submission and now exceeds the recommended area per child by 110 sqm. Logic would imply that this developer is planning to get initial approval and then seek ways to increase enrolment capacity through a much easier process.

I ask that the Council strongly reject this application and provide a compelling case to SAT to also reject this inappropriate application. I look forward to your response.

Sincerely,



Technical Memorandum

Title	Proposed Childcare Centre 164 Alfred Road, Swanbourne – Review Transcore’s Revised TIS		
Client	Residents Group of Mount Claremont - Swanbourne	Project No	CW1076100
Date	9/12/2019	Status	Rev C
Author	Edmond Hoang	Discipline	Traffic and Transport
Reviewer	Desmond Ho	Office	Perth

1 Background

Cardno has previously been commissioned by “The Residents Group of Mount Claremont - Swanbourne” to undertake a review of the revised traffic report prepared by Transcore for the proposed Childcare Centre to be located on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont. In addition, Cardno also reviewed the responses provided by Transcore and undertook relevant SIDRA network modelling to obtain a better understanding of the impact of traffic operations at both the Butler Avenue/Alfred Road and Alfred Road/Rochdale Road intersections.

A revised traffic impact statement (dated November 2019) has recently been prepared by Transcore for the abovementioned site and Cardno were again engaged to undertake a review thereof.

Cardno acknowledge the views and responses provided by Transcore, however upon further assessment it is prudent to raise issues of concern (including issues mentioned in previous reviews which have not been addressed in the November 2019 report) which is detailed in the following sections of this technical memorandum. The issues relate to the impact on safety aspects and the potential negative impact on traffic operations at the Alfred Road/Rochdale Road and Alfred Road/Butler Avenue intersections.

2 Parking Review

Cardno has reviewed the parking provision for the child care centre against the agreed upon parking rates for staff and visitors. The parking provision appears to be compliant with the parking requirements.

3 Sight Line Assessment

Cardno has reviewed Transcore’s sight line assessment for the Alfred Road/ Butler Avenue intersection and acknowledges that the sight line calculations would appear to be appropriate although the use of the 85th percentile speed instead of the design speed is questioned. Alfred Road is posted 60km/h so the design speed would be 70km/h. Hence the SISD associated with a 70km/h design speed is 151m.

Transcore’s report indicated that a SISD of 95m was determined at the Alfred Road/Butler Avenue intersection. A Site visit was conducted to confirm whether the sight distance is achieved without any significant obstructions to visibility.

Visibility to the west adequately achieves a sight distance of 95m. The inclining road also provides better visibility of oncoming vehicles from the west at the abovementioned intersection (refer to **Figure 3-1**).

Visibility to the east is hindered by large trees located along the verge which affects visibility of oncoming eastbound vehicles as shown in **Figure 3-2**. This is further impaired by the slight curve along the road and the declining gradient in the direction of the Alfred Road/Rochdale Road signalised intersection.

The powerline pole along the southern side of Alfred Road has since been removed but the sight line issues still persists as shown in **Figure 3-3**. Cars are briefly visible in the gaps between the verge trees however this is not a reliable method of observing oncoming vehicles from a safety perspective, especially for right turning vehicles as they would need to consider traffic from both directions. Therefore, in its current arrangement, a 95m sight distance to the east is not achieved as verge obstructions and the geometric layout of the road hinders driver visibility. As Transcore's assessment was conducted under the extended design domain (EDD) where the SISD is reduced, there are serious concerns when this reduced SISD is not met. Cardno is still concerned that the increase in traffic due to the proposed development could potentially exacerbate the safety issues at this intersection.

Figure 3-1 Visibility to the west of Alfred Road/Butler Avenue



Figure 3-2 Visibility to the east of Alfred Road/Butler Avenue



Figure 3-3 Visibility of cars to the east of Alfred Road/Butler Avenue



4 Intersection Warrant Assessment

Cardno has undertaken an intersection warrant assessment based on the Guide to Road Design - Part 4A and *Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections*.

A warrant assessment for a safe intersection design in accordance with the Austroads/Main Roads guidelines was not provided. Therefore, Cardno has undertaken an intersection warrant assessment, using the SIDRA output traffic flows provided by Transcore to assess the relevant intersection treatment required for this intersection. The following analysis is based on Austroads requirements which is similar to the Main Roads WA intersection warrant assessment. The methodology used in Main Roads WA intersection warrants differs slightly although it generally provides similar results (in this case, the only difference is MRWA's methodology for Option 30/70 during the PM peak requires an AUR treatment).

4.1 Turning Volumes

Figure 4-1 and **Figure 4-2** show the turning volumes obtained from SIDRA output results provided in Transcore's report for the intersection analysis for the post-development scenario for the critical AM and PM peak hour periods. These turning volumes include both the existing traffic as well as the estimated trips generated by the proposed development. It is mentioned in the Transcore report that two distribution scenarios were assessed (Option 30/70 and Option 70/30). The intersection warrants for these two scenarios have been assessed.

Figure 4-1 Post Development Turning volume (30/70 Option)

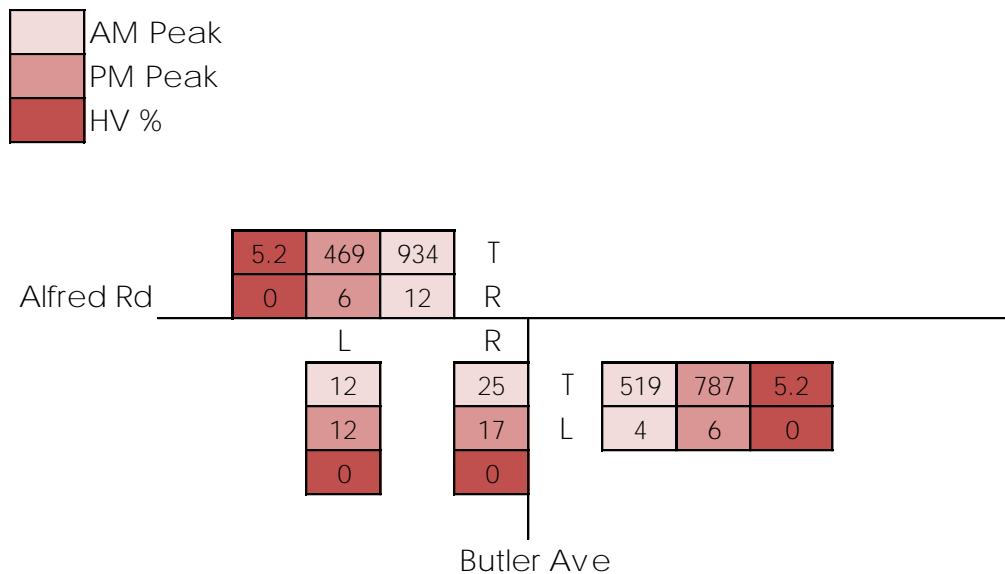
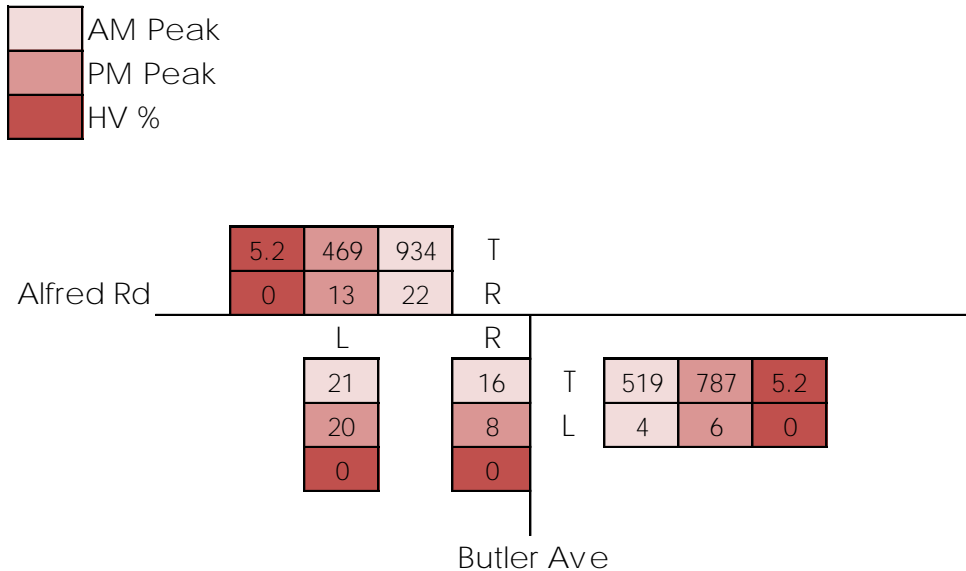


Figure 4-2 Post Development Turning volume (70/30 Option)



4.2 Austroads Intersection Warrants

The existing intersection layout has been reviewed in accordance with the *Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections*.

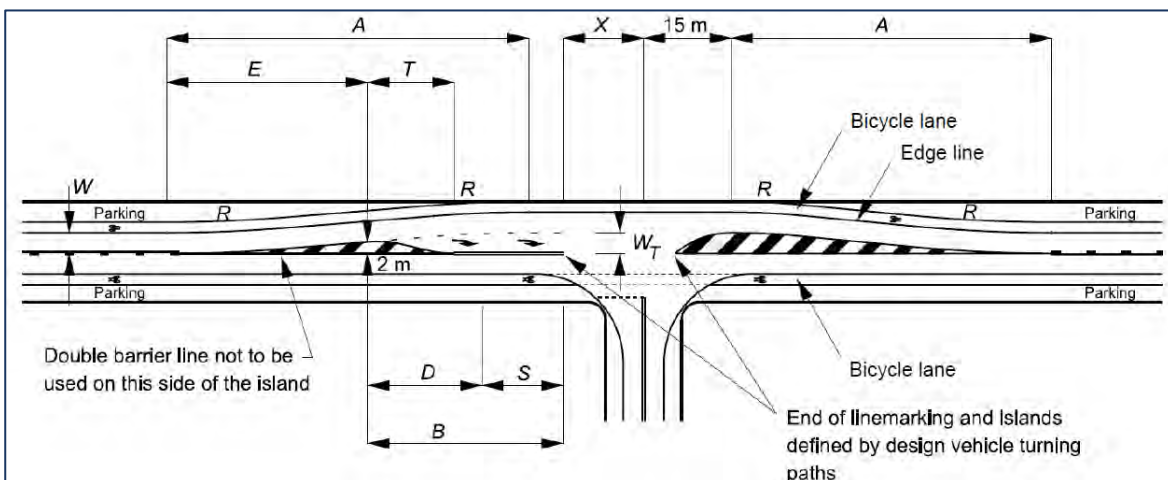
The warrants for this priority intersection are provided in a separate document.

Based on the total volume of turning traffic (with the proposed development traffic) at the Alfred Road/Butler Avenue intersection, the assessment indicates that a channelised right turn (CHR) and basic auxiliary left turn (AUL) treatment for the post-development scenario are required for the Option 30/70 and Option 70/30 distribution scenarios. Furthermore, under the Main Roads WA methodology an auxiliary right turn (AUR) and basic auxiliary left turn (AUL) treatment for the post-development scenario is required for the same distribution scenarios. The provision of these channelising and auxiliary lane treatments would likely require significant upgrades and road reserve at the Alfred Road/Butler Avenue intersection.

Additionally, a scenario which includes 70% right turn into Butler Avenue and 70% right turns out of Butler Avenue was also assessed which showed similar results for the abovementioned scenarios.

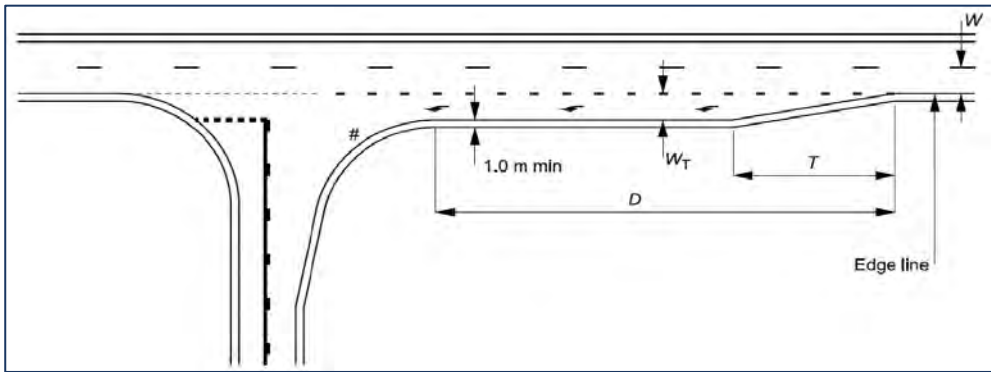
The Austroads general CHR(S) and AUL(S) compliance design is to be in accordance to the diagrams illustrated in **Figure 4-3** and **Figure 4-4**.

Figure 4-3 General Layout of CHR(S)



Source: *Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections* (Figure 7.7)

Figure 4-4 General Layout of AUL(S)



Source: Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections (Figure 8.3)

5 Intersection Analysis

5.1 Review of SIDRA Results

A review of Transcore's SIDRA results show that the operation of Alfred Road/Rochdale Road intersection improves slightly with the introduction of development traffic which is counter intuitive to how traffic operations generally work. The western and eastern approach show minor improvements to delays and queues while the northern and southern approaches show a slight increase in delays and queues. Conventionally, additional traffic added to the road network would result in a decline in intersection performance (in cases where no intersection improvements have been implemented), though it is acknowledged that other factors can potentially lead to improvements to traffic operations (such as modified/optimised signal timings and phasing).

Since the SIDRA models were not provided, Cardno were not able to check and confirm the input parameters, hence there is a need for explanation as to the cause of the abovementioned inconsistency.

5.2 Intersection Assessment

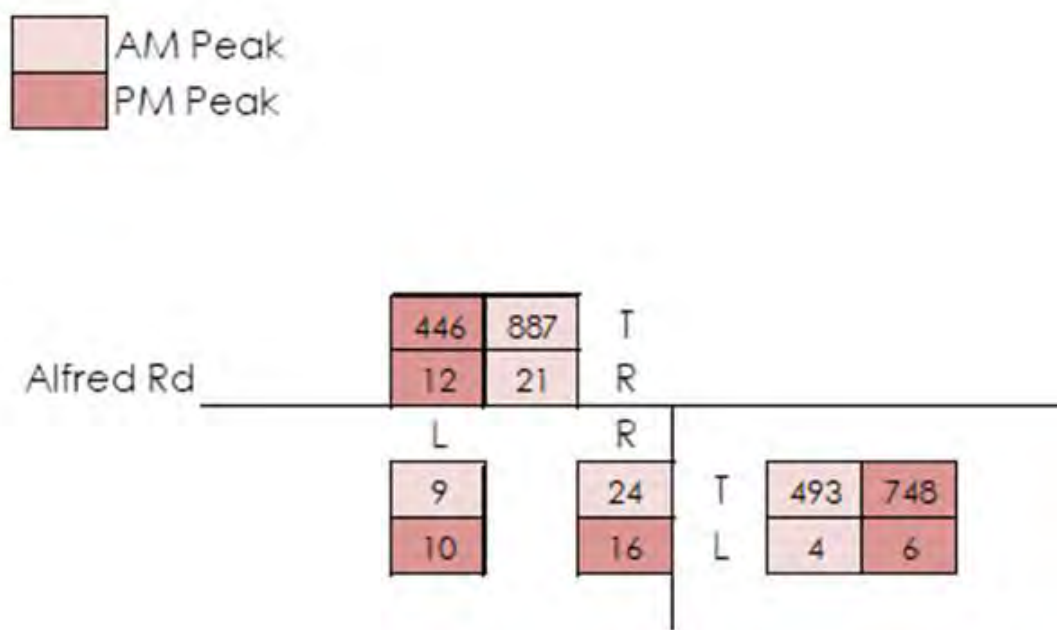
Cardno has modelled the two intersections (using the SIDRA modelling analysis tool) as a network to assess the impact of the signalised intersection on the operations of the Alfred Road/Butler Avenue intersection.

As the SIDRA assessment files from Transcore are unavailable, the following assumptions were used in the assessment:

- > The background traffic volumes used in the assessment were extracted from the SIDRA results in Transcore's report.
- > The signal phasing and timing at the Alfred Road/Rochdale Road intersection is based on the information extracted from Main Roads Traffic Map.
- > It appears that a growth rate was applied at the Alfred Road/Butler Avenue intersection to estimate the traffic volumes in the opening year of the development which is standard practice. However, a growth rate does not appear to be applied to the Alfred Road/Rochdale Road intersection. Additionally, the opening year of the development and the growth rate cannot be determined from the information provided, therefore the following assessment uses the existing volumes with no background growth applied. It is likely that the anticipated volumes during the opening year will be higher and hence would have negative impact on the performance of this intersection.
- > Concern was raised by the "The Residents Group of Mount Claremont - Swanbourne" with regard to the traffic distribution used in Transcore's report. The following development traffic distribution has been assessed:
 - 70% turn right into Butler Avenue and;
 - 70% turn right out of Butler Avenue.

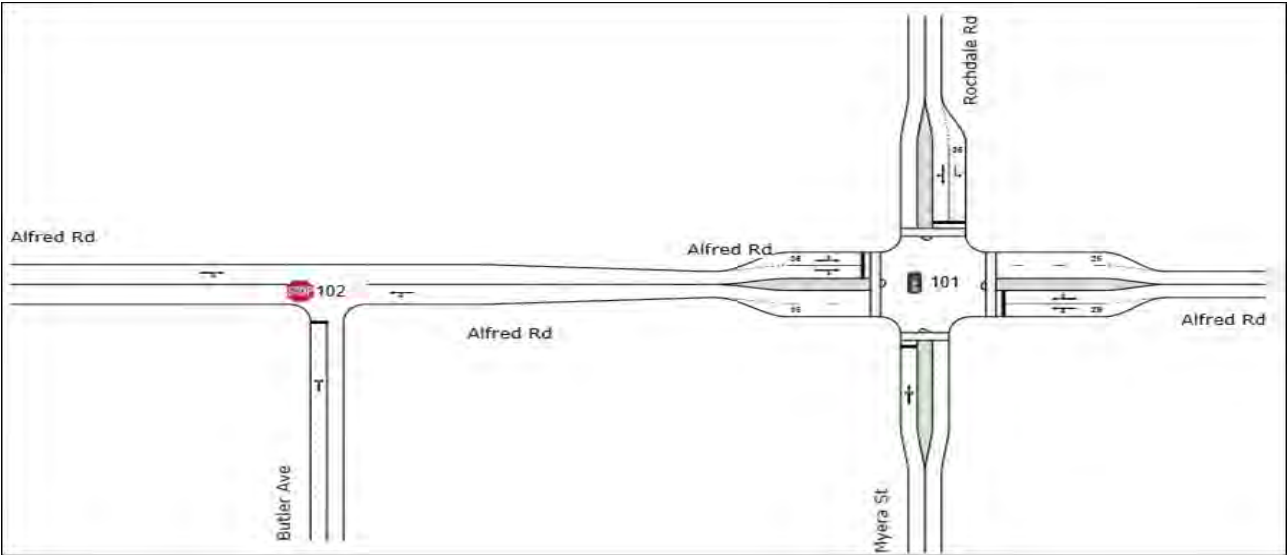
The total trips associated with the above trip distribution scenario is illustrated in **Figure 5-1**.

Figure 5-1 Total distributed trips



Alfred Road/Butler Avenue intersection and Alfred Road/Rochdale Road intersection modelled SIDRA network and intersection layout is illustrated in **Figure 5-2**. The performance of the intersection layout was then assessed for the normal weekday AM and PM peak hour period.

Figure 5-2 SIDRA Network and Intersection Layout



The SIDRA assessment of the network layout for the existing and post development scenario is summarised in **Table 5-1** and **Table 5-2**.

Table 5-1 Intersection Performance for Alfred Road/Rochdale Road

Intersection Approach	AM Peak Hour					PM Peak Hour			
		DOS	Delay (s)	LOS	95% Queue (m)	DOS	Delay (s)	LOS	95% Queue (m)
Myera St (South)	L	0.035	19.7	B	2.1	0.025	16.6	B	0.8
	T	0.035	15.1	B	2.1	0.025	12.1	B	0.8
	R	0.035	19.7	B	2.1	0.025	16.6	B	0.8
Alfred Rd (East)	L	0.065	13.2	B	5.8	0.116	14.5	B	5.9
	T	0.324	10.2	B	29.5	0.581	11.1	B	33.7
	R	0.324	16.4	B	29.5	0.581	17.1	B	33.7
Rochdale Rd (North)	L	0.156	20.3	C	11.4	0.062	17.6	B	2.5
	T	0.506	17.1	B	38.6	0.545	15	B	24.7
	R	0.506	21.7	C	38.6	0.545	19.5	B	24.7
Alfred Rd (West)	L	0.329	14.9	B	33.1	0.245	15.6	B	12.5
	T	0.814	16.9	B	112.7	0.346	10.1	B	19.7
	R	0.814	22.3	C	112.7	0.346	15.4	B	19.7

Table 5-2 Intersection Performance for Alfred Road/Butler Avenue

Intersection Approach	AM Peak Hour					PM Peak Hour			
		DOS	Delay (s)	LOS	95% Queue (m)	DOS	Delay (s)	LOS	95% Queue (m)
Butler Ave (South)	L	0.127	9.4	A	1.8	0.052	11.1	B	0.4
	R	0.127	17.6	C	1.8	0.052	13.5	B	0.4
Alfred Rd (East)	L	0.246	5.4	A	0	0.374	5.4	A	0
	T	0.246	0	A	0	0.374	0	A	0
Alfred Rd (West)	T	0.662	0.3	A	4.8	0.238	0.3	A	0.7
	R	0.662	9.5	A	4.8	0.238	10.6	B	0.7

This analysis confirms that queues are expected to extend beyond the Butler Avenue intersection from the Rochdale Road intersection as illustrated in **Figure 5-3**.

The queues on Alfred Road would have an impact on the vehicles turning right into and out of Butler Avenue. It is expected that the excessive queuing on this approach would result in a slight increase in delay and queuing on the southern approach of the Butler Avenue intersection and also impacting the Mayfair Street intersection.

Figure 5-3 Queue Distances



6 Access Arrangement

In accordance to the Town of Claremont's Policy Manual, *"Where crossovers intersect a footpath, the footpath will have priority and continue through the crossover. All new or reinstated footpaths are to be constructed to Town specifications and on the pre-existing alignment, unless directed otherwise by the Town."* Pedestrian priority will need to be shown at the crossovers.

6.1 Access along Alfred Road

Based on available traffic data sourced from Main Roads WA, Alfred Road is classified as a District Distributor A road and carries approximately 11,647 vpd in 2017/2018. A total of 1,206 and 1,118 vehicles in both directions was recorded during the morning (AM) and afternoon (PM) peak hour periods respectively.

In accordance to Main Roads' Road Hierarchy Criteria, frontage access on Distributor A roads is generally not desirable given that these types of roads facilitate high capacity traffic movement.

Additionally, the Western Australian Planning Commission (WAPC) childcare centre guidelines is not prescriptive with regard to the location of child care centres but does stipulate that *"access is not from a major road or in close proximity to a major intersection where there may be safety concerns"*. Given that Alfred Road carries relatively high traffic volumes and there are safety concerns and visibility issues associated with the proposed site, the provision of an access along Alfred Road would appear to be non-compliant.

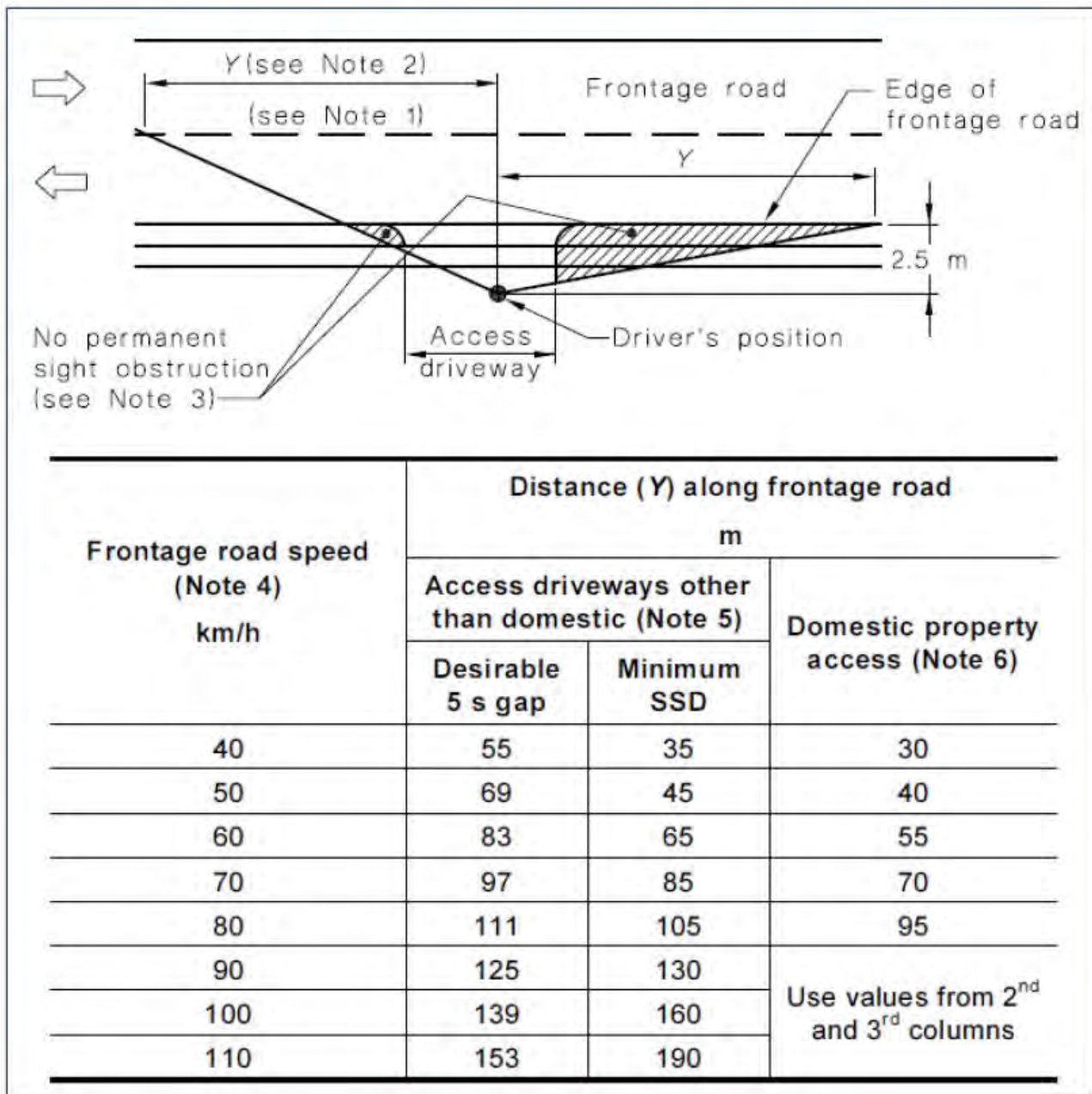
Additionally, the current design of the proposed left in only along Alfred Road will require additional traffic management measures to prevent vehicles from turning right into this access.

6.2 Access along Butler Avenue

Cardno has reviewed the location of the proposed crossover along Butler Avenue in accordance with the *AS2890.1 – 2004 – Off-street car parking standards*. According to Figure 3.2 of the *AS2890.1 – 2004 – Off-street car parking*, as shown in **Figure 6-1**, it indicates that the minimum stopping sight distance (SSD) of 45m is required for a frontage speed of 50km/h road for a non-domestic driveway.

Based on the revised drawings, the proposed crossover is to be located 40m from the Alfred Road intersection. Therefore, the sight distance for the proposed location of the crossover for the proposed development theoretically would appear to be inadequate in accordance to AS2890.1.

Figure 6-1 Sight Distance at Access Driveway



Source: AS2890.1 – 2004 – Off-street car parking

7 Conclusion

Based on this review, Cardno's concludes the following:

- > Cardno has reviewed Transcore's sight line assessment for the Alfred Road/ Butler Avenue intersection and acknowledges that the sight line calculations would appear to be appropriate although the use of the 85th percentile speed instead of the design speed is questioned. The SISD of 95m at the Alfred Road/Butler Avenue intersection is sufficient to the west but is insufficient for the vehicles from the east as visibility is affected by the road geometry and verge trees. The powerline pole along the southern side of Alfred Road has since been removed but the sightlines issues still persist. Cardno is concerned that the increase in traffic due to the proposed development could potentially exacerbate the safety issues at this intersection.
- > Based on the expected volume of turning traffic at the Alfred Road/Butler Avenue intersection, the intersection warrants indicate a channelized right turn (CHR)/auxiliary right turn (AUR) treatment and basic auxiliary left turn (AUL) treatment should be provided at this intersection.
- > Based on the SIDRA assessment, queues are expected to extend beyond the Butler Avenue intersection from the Rochdale Road intersection. The queues on Alfred Road would have an impact on the vehicles turning right into and out of Butler Avenue and will also impact the traffic operations of Alfred Road and the intersection of Butler Avenue and Mayfair Street.
- > The proposed crossovers for the child care centre will need to be designed such that the pedestrian path has priority.
- > The provision of a left in only access along Alfred Road is undesirable based on the WAPC and MRWA guidelines given the high traffic volumes along Alfred Street and safety concerns and visibility issues associated with the proposed site.
- > Based on the revised drawings, the proposed crossover is to be located 40m from the Alfred Road intersection. Therefore, the sight distance for the proposed location of the crossover for the proposed development theoretically would appear to be inadequate in accordance to AS2890.1.

In summary, the Transcore report appears to primarily focus on traffic capacity issues than all traffic safety related aspects. Cardno believes that the proposed development on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont will have a detrimental impact on the safety and traffic operations on Alfred Road and its intersection with Butler Avenue.

Zane and Kellie Randell
4 Butler Ave,
Swanbourne, WA 6010
E: zrandell77@gmail.com and kellie.swincer@gmail.com
M: 0429 571 639

29 Nov 2019

Town of Claremont
PO Box 54
Claremont WA 6910
toc@claremont.wa.gov.au

Attn: Planning and Development

Re: 162 & 164 Alred Rd Swanbourne Proposed Child Care Centre

To Whom it May Concern,

We with our two young children at 4 Butler Ave, Swanbourne, which is immediately adjacent to the proposed development. We wish to object to the proposed development based on the negative impacts on safety, traffic and the existing residential amenity that would occur if such a large scale commercial development should proceed.

Attached is a detailed objection to the proposed child care centre and I summarise these issues here.

The amended proposal makes a number of compromises, including significant compromises to the optimal development of children as is detailed in the Noise Management and Child Supervision Policy. This policy has been developed to curb natural child behaviour and compromise development due to the location of the centre in a quiet residential area. The Policy includes such restrictive requirements for outdoor play and supervision that will be impossible for staff to comply with.

Whilst the number of children has been reduced from the original proposal, the area allowed per child is far in excess of what is required. A natural assumption is that the applicants aim to gain approval given the current proposal and conditions, then increase the numbers of staff and children to maximise the allowed area as such changes do not require approval once in operation.

The proposed centre will exacerbate existing safety risks along this stretch of Alfred Rd, including existing conditions associated with Butler Ave that will create serious safety risks for pedestrians and road users along Butler Ave and at the Butler Ave / Alfred Rd intersection. This concern is supported by a recent Cardno report dated 28/11/2019 which states:

- *"Cardno is concerned that the increase in traffic due to the proposed development could potentially exacerbate the safety issues at this intersection."*

I have repeatedly cautioned about the various Human Performance safety risks that will be present and affecting drivers at various times during children being dropped off or picked up from this child care centre. The recent changes in the proposal do not alter these issues. Safety concerns resulting from the additional traffic in and out of Butler Ave will only be exacerbated, as is reported in the recent Cardno report which highlights likely queues to extend 113m from the Rochdale Rd intersection past Butler Ave and Mayfair Rd. Given these factors, it will be a matter of when, not if, a person makes a slip or mistake and a tragic result occurs.

My concerns that safety has not been a primary focus in the reports developed for the applicant are reiterated in the latest Cardno report which summarises:

“In summary, the Transcore report appears to primarily focus on traffic capacity issues than all traffic safety related aspects. Cardno believes that the proposed development on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont will have a detrimental impact on the safety and traffic operations on Alfred Road and its intersection with Butler Avenue.”

In my experience as a safety professional with considerable experience investigating serious workplace incidents, including many workplace fatalities and near fatalities, I can clearly see how this situation could lead to a serious or fatal accident occurring. My question to those with authority for approval or rejection of this development is should a child or other person be killed as a result of increased traffic from this development, who will bear this responsibility? How will authorities respond when they have already been cautioned about the risk? To individuals involved in the decision-making process, if this was your child struck by an inattentive driver, or your child or grandchild was struck and killed crossing the road by a driver in a rush to drop their child at day care and get to their work meeting on time, what would your decision be then?

For these reasons, we ask you to please consider the safety of the community and child care users, consider the existing quiet, enjoyable residential amenity, and consider the wellbeing of children attending child care centres and reject this proposed development.

Sincerely yours,

Zane and Kellie Randell

29 November 2019

Zane and Kellie Randell
4 Butler Ave,
Swanbourne, WA 6010
E: zrandell77@gmail.com
M: 0429 571 639

Attn: Planning and Development

Re: 162 & 164 Alfred Rd Swanbourne – Proposed Child Care Centre

To Whom it May Concern,

Please refer to the below concerns for why we object to the proposed child care centre being approved.

Safety and Risk Management

This is a residential area, and Butler Avenue is a quiet cul-de-sac with 17 houses. The street has a footpath only for approx. 60m, after which pedestrians walk on the road to access the bushland, Lake Claremont reserve and mixed-use paths at the closed end of the cul-de-sac. This includes school children walking to and from nearby Swanbourne Primary School. The additional traffic associated with a commercial development with 65 children and 12 staff would create not only unacceptable increases in traffic in comparison to the existing low residential movements, but importantly would introduce serious safety risks for residents, local community and primary school children utilising the street as they currently do.

As an experienced safety and health professional Zane has previously provided risk assessment details regarding the intersection of Butler Ave and Alfred Rd where the risk of a serious permanent disabling injury or death was identified as a high likelihood. The reduction in numbers of vehicles with the recent changes does indeed reduce this likelihood, however the assessment remains that there is an unacceptably high risk of a serious injury or death as a result of a vehicle/pedestrian impact due to:

- pedestrians crossing Butler Ave along the footpath of Alfred Rd;
- pedestrians crossing Alfred Rd from North to South, including school children; and
- pedestrians walking up or down Butler Ave, in particular this risk is exacerbated by the steep blind crest and lack of footpath.

To support these concerns, recently taken footage along Alfred Rd during morning peak traffic (see YouTube: https://youtu.be/Pt3_D_bziT8) demonstrates:

- school children riding bicycles and walking behind cars on Butler Ave as they wait to turn into Alfred Rd traffic;
- cars driving up onto the footpath on Alfred Rd heading East to go around backed up traffic behind a car waiting to turn right into Butler Ave;
- cars travelling West along Alfred Rd veering into the opening of Butler Ave to go around cars backed up behind a car turning right into Mayfair St.

A recent report developed by Cardno dated 29/11/2019 supports these views by the statement:

- *Cardno is concerned that the increase in traffic due to the proposed development could potentially exacerbate the safety issues at this intersection.*

Furthermore, Butler Ave has already seen a rear end collision resulting from a car driving over the blind crest colliding with a parked car on the side of the road. This was unreported hence no record exists however residents in the street involved in the incident attest to the accuracy of this.

During recent months there have been two children struck by cars at the Rochdale Rd / Alfred Rd intersection. One boy who was crossing on the green pedestrian light was thrown onto the windscreen of a car, and another boy on his bicycle was struck by a car on Myera St next to the Alfred Rd lights.

There can be no doubt that section of road is already hazardous. An increase in traffic, particularly vehicles turning across traffic to enter and come out of a cul-de-sac with no other entry or exit will only exacerbate the problem and increase the risk to safety.

WAPC bulletin 72/2009 clearly states:

A child care centre would generally not be suitable where: S3.3. j) Access from a major road or in close proximity to a major intersection where there may be safety concerns.

This location has both. The most recent plans include an additional access from Alfred Rd, therefore in contradiction to the WAPC requirements, and given Butler Ave is a cul-de-sac the only other entry on Butler Ave is still via Alfred Rd.

Cardno support the view that the provision of an access along Alfred Rd would be non-compliant to these requirements:

“Given that Alfred Road carries relatively high traffic volumes and there are safety concerns and visibility issues associated with the proposed site, the provision of an access along Alfred Road would appear to be non-compliant.”

Further, WAPC 72/2009 S3.6 states (it)

...should only be approved if it can be demonstrated that it will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users.

The above points and the YouTube video provided at https://youtu.be/Pt3_D_bziT8 clearly demonstrate this requirement cannot be met, and that this development would create a risk for children and families using the centre and increase the risk for pedestrians and road users.

Human Performance Implications

During presentations to MWJDAP and SAT, Zane has highlighted the implications of Human Performance on the existing safety concerns for Butler Ave and at the intersection of Butler Ave and Alfred Rd. These appear to have been ignored by the applicant in the recent revised proposal, so we feel it prudent to recap the issues here should personnel be reading this who were not privy to previous statements. Further detail to explain Human Performance is located at Annex A in this document.

Within the field of Human Performance there are ten (10) “Error Traps” or precursors to error. These are task related characteristics that increase the probability for error during a specific action. Given the location of the proposed child care centre and the activities involved for people travelling to and

from (dropping children off or picking up), there are six error traps for drivers or pedestrians that may be present at any given time

- Stress
- Multi-tasking / high workload
- Time pressure
- Overconfidence
- Distractions
- The end of a work shift or an extended shift

The proposed childcare centre at the corner of Butler Avenue and Alfred Road in Swanbourne risks creating a number of opportunities where there may be significant risk to pedestrians and vehicle occupants.

An examination of these situations using Human Performance principles highlights these concerns and the potential increased risk to life.

Situation 1 – Vehicle turning from Butler Ave into traffic on Alfred Rd

Potential Error Traps:

- Stress (anxious child not wanting to be left; stressful morning getting child ready as well as family / self)
- Multi-tasking / high workload (planning the day; mentally preparing for meetings/daily activities; debriefing the day with child; mentally planning evening meal/schedule)
- Time pressure (running late to work/daily activities; hurry to get home at end of the day)
- Overconfidence (used to driving; never had anything go wrong at this intersection before)
- Distractions (child or children talking/yelling; heavy stream of traffic flowing in both directions; school children crossing Butler Ave and/or Alfred Rd in either East or West direction; fast moving vehicles trying to make it through the controlled intersection at Rochdale/Alfred Rd)
- End of a work shift/extended shift (night shift workers / picking up after long day shift; parents with young children who wake frequently throughout the night)

In addition to Human Performance error traps in this situation is an increased risk due to the position of the sun being in a drivers eyes at certain times of the year whilst turning right (East) onto Alfred Rd early in the morning, and left (West) at sunset. As an example, at certain times of the year we commonly have to open the window and shield our eyes to see properly whilst turning onto Alfred Rd from Butler Ave.

Situation 2 – Vehicle driving South down Butler Ave to turn around at the cul de sac at the bottom of the hill

Potential Error Traps:

These would be very similar to Situation 1, with the addition of:

- Stress (or frustration, required to drive down Butler Ave to turn around)
- Time pressure (exacerbated due to the extra time required to turn around at the base of the hill on Butler Ave)

- Combined with the added risk of the blind crest on the hill

For both these situations the driver would be operating in either **Rule Based** or **Knowledge** mode. This has an associated error rate of between 1:2 - 1:100. The driver is typically driving based on habit (skills based) which is *non-thinking*, however in these situations they are also reliant on knowledge which they do not have available upon which to make a decision as to what action they will take.

A driver turning into Alfred Rd from Butler Ave does not know about vehicles coming in their direction from the controlled intersection at Rochdale Rd until the vehicle is approx. 40m away. This provides approximately 2 seconds for the driver to decide whether they will accelerate to turn in front of the vehicle or wait for a longer break in traffic (it is worth noting, this is the absolute minimum time allowed by Main Roads WA versus the recommended minimum of 2.5 seconds). Nor do they know what action pedestrians are going to take crossing Butler Ave or Alfred Rd, and it is common for pedestrians to make sudden decision to dash across slim gaps in traffic.

In Situation 2 the driver is approaching a blind hill with no knowledge of what is over the crest, which on a street with no sidewalk for pedestrians, and frequent use of the road for school children and local residents/community members poses a significant risk as they often having to move into the middle of the road to go around parked cars (which would also be increased with the child care centre).

The residents of Butler Ave have existing knowledge of these risks and already cautiously manage them on a daily basis. With the significant increase in traffic from the proposed child care centre, the likelihood of an error being made is increased and dramatically increases the risk of a serious accident occurring.

Noise Management and Child Supervision Policy

The applicants have provided a “Noise Management and Child Supervision Policy”. This Policy and Plan is poorly written with a multitude of errors and incorrect information. It also has contradicting statements, in particular a statement that says the philosophy of the Centre is ‘free flow’ with respect to outdoor play for children attending the centre, yet it then restricts set hours per day when children will be allowed outdoors.

A maximum of 3 hours per day has been allocated for children to be outdoors participating in ‘free play’. Restricting outdoor play is in conflict to current recommended practice for early childhood development and not in the best interest of any child attending the Centre.

When outdoors, children will have to follow strict conditions under which they are allowed to play and the Policy states that staff will be placed at ‘supervision’ points to keep children away from the boundary fences and from making noise. Apart from being an absurd practice for any child care centre, it is also unrealistic that 1) you can stop children making noise, banging items to make music and from being children and playing loudly, and 2) having dedicated staff to be in supervision points is also unrealistic as we know as soon as a child needs assistance, to go to the toilet or needs changing then that staff member is out of action.

The fact that a Child Care Centre needs this type of Policy and Plan suggests it will be a sad and depressing place for any child attending the Centre and all due to it being built in the WRONG

location. Additionally, how long will this 'Policy & Plan' actually remain effective and how it is to be policed? It is more than likely that the 'Policy and Plan' has been drafted in order to minimise "impulsive" noise characteristics in the outside play areas for the purpose of the Environmental Acoustic Assessment so as to achieve approval, and the Policy will subsequently be amended, removed, ignored or simply impossible for staff to abide by upon opening or over time. As immediate neighbours, it will then be upon us and other nearby residents to repeatedly complain, however by that stage the problem already exists and will be impossible to rectify.

Rather than the applicant identifying a suitable location that *optimises the development of children*, this Policy and Plan significantly *compromises normal childhood activity* and will *negatively impact their development* because of restrictions due to the location in a quiet residential area.

This all further supports the community view that the proposed Centre should not be built in this residentially zoned area.

Impact on Family and Residents

As we have previously stated in regard to this development, we deliberately chose to live in a location that was zoned residential, with low traffic volumes, quiet, and safe for our children to play outside and walk down the street to the nearby bush, lake and school, as many other local children and residents do. Should it go ahead, this development will have a significantly detrimental impact on our quality of life as the existing enjoyable, residential amenity will be dramatically impacted.

We acknowledge that in the revised plans, the applicants have taken steps to reduce the noise disturbance on my property. It is noted however that there still exists a child play area immediately adjacent to the Eastern boundary, placing it alongside the property at 160 Alfred Rd. This is non-compliant with local planning requirements which prohibit play areas being adjacent to neighbouring properties and I can only assume will have a detrimental impact on anyone living there.

Further to the above, the original proposal was for 90 children. This revised proposal allows for a far greater area per child than is required. Whilst this may be altruistic in nature, it is highly likely that the application is made for the purpose of gaining approval under the proposed conditions then making subsequent increases in children and staff once the centre is in operation. As there are no requirements for approval for such changes, there will be little to prevent this occurring.

For the above reasons, we ask you to please reject the application for this child care centre.

Sincerely yours,

Zane and Kellie Randell

29 November 2019

Annex A

What is “Human Performance”?

Human Performance is the study of how and why people behave or act a certain way. It is about understanding how a culture and environment interact with various personal factors (such as ability, knowledge, distraction, fatigue etc) to influence an outcome – typically safety related.

The field of Human Performance has evolved through integrating psychology and the framework for understanding error developed by Dr James Reason.

Errors typically occur through two modes: slips and mistakes. Slips are errors that occur through routine activities that require little active thought processes. Mistakes are errors that occur during activities that require active thought processes to understand or make decisions about the situation and our response to it.

Further, there are typically three modes of operating (performance modes) through which human error occurs. These are based on the level of familiarity the individual has with the activity or task. If an individual is familiar with a task they typically pay little attention to it. Conversely, if an individual is unfamiliar with a task or situation they will usually be more attentive. The three (3) performance modes are:

- Skill based: routine actions in a familiar environment or situation, such as driving a car. People simply perform the required action with little thought.
 - In this mode people are acting out of memory and habit. People typically do not consciously think about the actions they are performing.
 - Errors are usually the result of lack of attention or awareness to the local/immediate situation
 - The error rate is 1:1,000
- Rule based: performance of a number of specific actions influenced by a series of recognised circumstances.
 - A person is consciously assessing the situation and takes action based on recognised patterns or familiarity with the situation. E.g. In a car at traffic lights a red turning arrow goes off and the remaining green light indicates it is OK to proceed if no oncoming traffic, we therefore make the decision to move forward depending on the traffic situation
 - Error rate 1:100
- Knowledge based: this is the least familiar type of action and relies on some specific knowledge about the situation.
 - This requires a person to analyse, problem solve and use judgement. These actions are strongly influenced by assumptions where information is missing.
 - A person does not know whether they have all the necessary information upon which to make the correct (or safe) decision
 - E.g. Driving a car and we see a person standing on the side of a busy road. We do not know if they are going to remain there or try to dash across to the other side in between traffic
 - Error rate 1:2 – 1:10

From: Mishy <mish@swimsmooth.com>
Sent: Friday, 29 November 2019 4:56 PM
To: Town of Claremont
Cc: minister.saffioti@dpc.wa.gov.au
Subject: Development at 162-164 Alfred Road

Categories: Sherralee

Good afternoon Town of Claremont Council and Minister Saffioti,

As a resident in Mount Claremont on Alfred Road I am concerned of the implications that the proposed commercial development at 162-164 Alfred Road will have to the area and the local community. My primary concerns are;

- A large scale commercial development in a residential area which has the capacity for 90 children and 13 staff members and the implications this will have on noise level in the local area.
- The increased traffic will have an impact on the already congested local traffic during peak hours along Alfred Road. This will also pose a significant hazard to children walking or riding their bikes to and from school. I myself have two children who attend Mount Claremont primary school and I am already concerned of the increased number of cars along Alfred Road during these times. I understand that a traffic assessment has been done by the developer, however I question whether this is biased and a full traffic assessment needs to be conducted by an external source to give a valid indication of the ramifications.
- On a more personal note my son was knocked down by a car this year in early August while crossing at the traffic lights. Luckily he was ok and made a full recovery but he did spend 3 days at PCH with a severe concussion and wounds on his elbow, hip and knee. This is every parents nightmare and I only suspect that with a daycare of this size the increased traffic along Alfred road is my biggest concern.
- The lack of available parking for carers dropping and picking up 90 children during peak hours will be a serious issue in regards to safety and cars parking along Alfred Road and the nearby side streets.
- Finally, there are already a number of daycares in the area which service the local families and these daycare are not at capacity. These daycares/ early learning centres include Annie's on Strickland Street, Montessori Mulberry tree at HBF stadium, Jellybeans in Swanbourne, and Bumblebee at the opposite end of Alfred road.

Based on the information I have accessed online and from local neighbours I strongly object to this development on the grounds of safety, traffic, and residential impact.

This application received the most objections of any development in the last decade in July 2019. The Town of Claremont has already said NO. The state panel said NO and now they have appealed to the Tribunal. Why is this developer bypassing government, our representatives and the community? Please take a stand supporting the community and say NO to this development.

Thank you for the opportunity to voice my concerns.

Kind regards,

Michelle Newsome
145 Alfred Road
Mount Claremont WA

From: Emily Salom <emily@omgevents.com.au>
Sent: Friday, 29 November 2019 5:11 PM
To: Town of Claremont
Subject: 162-164 Alfred Rd Swanbourne - child care

Categories: Sherralee

Planning and development

Hi

I am writing in support of the proposed child care centre.

I believe this will be a great benefit to the community, and it gets my full support.

Emily Salom
Strickland St, Mt Claremont
0407 421 980

From: Merelyn Goodwin <auntiemeremere@hotmail.com>
Sent: Friday, 29 November 2019 5:12 PM
To: Town of Claremont
Subject: FW: Stop Dangerous Development in Mt Claremont and Swanbourne

Dear sir/madam

I have just found out about the proposed development of a child care facility at 162-164 Alfred Road, Swanbourne. Apparently this will be a childcare facility for 65 children and staff.

It has been my observation that Alfred Road is very busy particularly at school drop off/collection times, due to traffic coming off/joining West Coast Highway, making their way to/from the schools in the area (primarily Mt Claremont Primary and Swanbourne Primary). This is exacerbated by those living locally, using the road at the same time to either take children to/from school, plus making their way to other parts of the suburbs or to the train station at Claremont. Of course, during the morning and evening, traffic increases, as commuters make their way to/from employment.

Surely the increase in vehicle numbers caused by the proposed childcare facility, will only exacerbate the problem. Alfred Road carries a lot of traffic already, the amount having increased since the building of the apartments in and around the old Swanbourne High School site. The roads here carry a lot of heavy traffic, due to the increased building for instance, the apartments being built around the Claremont train station.

Please have a care for those living in this area and using an already busy road.

We need to keep the roads safe, and building the above facility, will make this more difficult.

Kind regards,

Merelyn & Geoff Goodwin
Mt Claremont

From: Vera Sun <vera.yi.sun@gmail.com>
Sent: Friday, 29 November 2019 7:03 PM
To: Town of Claremont
Subject: Objection of the proposed Child Care Center - 162 & 164 Alfred Road, Swanbourne

Categories: Sherralee

Dear Planning and Development,

I am the owner of 160 Alfred Rd, Swanbourne, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre that is currently in mediation at the State Administrative Tribunal.

This application is for a large scale, commercial childcare centre located in a residential area, which will have a drastic, negative impact on Alfred Road and its safety. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

In my case as the next door neighbor, the cars driving out from the two proposed new homes on 160 Alfred Rd will face higher risk to turn right to east direction onto Alfred Rd with the higher volume of the traffic with this child care centre especially during the peak hour. With the second version of design, the main car entrance this proposed child care centre is from Alfred Rd, which also make the access to Alfred Road turning left more dangerous and difficult during the peak hour.

In addition, the current two-level building design is worse than before and our privacy is at risk with the overlooking windows above. Because of the easement design of our future building design, we have to leave enough space in front of the house, north of the land adjacent to Alfred Road and make the main house site to the south end, which has to be now side by side to the proposed main building of the child care center.

As proposed outdoor uncovered playgrounds of the child care center are now designed directly next (not like to the south boundary there is a wide distance to the south side neighbor and the outdoor play area is covered) to lot 1 (160A Alfred Rd) the new home site, the future family can't enjoy quiet lives from 6.30am to 6pm due to the obvious noise problem, which is impossible to deny even with the icy cold data analysis. The proposed outdoor playground area at the east side actually covers the main area of future residential living (side by side actually), which means the future family will have to suffer the noise if the child care center starts running considering its size of more than 65 kids or even more because they have more than enough internal space. We are normal human beings and have the right to live in peace, not fighting everyday with the noise problem which can be prevented from the beginning and the innocent children shouldn't bear any potential anger or hatred relying on the tolerance of the future neighbors. As proud Australian citizens, we should be keen to build up our community in harmony and try our best to avoid any potential conflict or dispute.

As a fact, a play area immediately adjacent to my property is non-compliant with state planning guidelines WAPC Planning Bulletin 72/2009 which states play areas shall not be adjacent to neighboring properties.

The other reasons for my objection are as follows:

- Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.
- The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.
- Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.

- In the new plans, all cars will need to enter via Alfred Road and exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.
- The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons
 - It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Nedlands – however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east – compounding the traffic nightmare that will be generated.
 - All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road) – the revised plans do not address this traffic chaos.
 - Figure 2 and calculations have no credibility as the assumptions are not real.
 - Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.
 - If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26...you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.
- The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.
- The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.
- Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.
- The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –
 - Needs to be considered suitable from a traffic/safety point of view – it is not due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Avenue has limited visibility
 - Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road)
 - No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)
- In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic)
- Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.
- Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.
- Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.

- In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.
- If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue
- The intersection directly west – Narla Road and Alfred is extremely busy and is in close proximity. Narla / Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.
- Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.
- The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred.
- There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.
- Adding to further congestion and safety issues - the developer Transcore report on page 5 states that "waste collection **should** take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors." And "In this case it is also **recommended** that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose." – there is no guarantee from the developer that this will occur and how can the Council effectively police this?
- The developer makes an unsubstantiated claim on page 8 that "As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving from afar". The community is already well serviced with more childcare centres than are required. None of the local centres are full.
- The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required – why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

In this case of 100 kids transportation every day in the future rather than 65, in peak hour, getting onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 322 cars per day (161 in / 161 out) will have significant impact on the surrounding neighbourhood (300% + increase in traffic) and amenities

- The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.

As a conclusion, I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

Vera Sun

From: 刘岩 <loorugs@gmail.com>
Sent: Friday, 29 November 2019 7:05 PM
To: Town of Claremont
Subject: Objection of the proposed Child Care Center - 162 & 164 Alfred Road, Swanbourne
Categories: Sherralee

Dear Planning and Development,

I am the owner of 160 Alfred Rd, Swanbourne, and I am writing to express my concern about the revised application for 162&164 Alfred Road Swanbourne – Proposed Child Care Centre that is currently in mediation at the State Administrative Tribunal.

This application is for a large scale, commercial childcare centre located in a residential area, which will have a drastic, negative impact on Alfred Road and its safety. I strongly object to this development on the grounds of safety, traffic and impact on residential amenity.

The general reasons for my objection are as follows:

- Large, scale commercial development for 77 people is not appropriate in a residential area. The revised plans do not address the traffic, safety and impact concerns raised by the community and users of Alfred Road.
- The development will exacerbate the traffic congestion in this area on Alfred Road and it will be unsafe. In the period since the development was rejected by TOC and JDAP (July 2019), there have been three serious accidents along this stretch of Alfred Road. One 10 year old boy was put in critical condition.
- Approval of this development on this corner is irresponsible. Someone will die as a result of the traffic chaos that will be caused with traffic heading to city and 3 local schools, kids riding to school and local residents trying to access Alfred Road.
- In the new plans, all cars will need to enter via Alfred Road and exit via Butler Avenue. This will create traffic mayhem. In peak between 8am and 9am, 70% of the traffic travel east towards the city. So while the developers have added an entrance for west bound traffic, the bulk of the traffic in the morning is east bound and will need to turn into Butler Avenue. And the only exit is off Butler Ave so all drivers will need to leave via Butler Avenue to head east. This intersection is already under duress.
- The traffic modelling provided by the developer on page 9 of Transcore report is unrealistic for the following reasons
 - It claims 70% of traffic in AM peak will come from the east. There is no basis for this claim. There are already many childcare centres to the east on Claremont and Nedlands – however there are very few to the west. In addition 70% of AM peak traffic comes from the west travelling east – compounding the traffic nightmare that will be generated.
 - All exiting traffic will need to exit via Butler Avenue (and 70% of them wanting to turn right and travel east along Alfred Road) – the revised plans do not address this traffic chaos.
 - Figure 2 and calculations have no credibility as the assumptions are not real.
 - Figure 3 has been modelled assuming 70% of AM peak traffic comes from the west travelling east. However the modelling is flawed as it assumes that the traffic after drop off will then travel west. However, it is common sense to expect that most of these working parents will thereafter need to continue to travel east to the city or Subi to work. The claim that only 7 parents would want to exit Butler Ave to the east in peak lacks any credibility.
 - If you assume their numbers of total cars entering in peak are correct (which appear to be understated at 26....you will have 18 trying to cross over traffic from Alfred into Butler Avenue, while at least 18 (70% of 26) trying to exit Butler to head east. Plus the residents of this street trying to get out during peak at 8 to 9am. This will create traffic mayhem.

- The plans assume that staff will be required to park on the street with only 0.5 bays provided for staff. This is inadequate. Public transport to this location is poor with no transport from the direct north or south. And services only commence at 8:05am from the city whereas the centre opens at 6:30am.
- The centre will be open from 6:30am until 6:30pm and claim that staff and customers will use public transport. Given that the first bus on a weekday from the city arrives at 8:05am this claim is invalid. Staff will be unable to use this as an option.
- Butler Avenue has an extreme incline on it and is not very safe near the top end with limited visibility for drivers. The plans to have the exit only on Butler Avenue are unsafe.
- The plans do not align with the WAPC Planning Bulletin 72/2009. In particular –
 - Needs to be considered suitable from a traffic/safety point of view – it is not due to blind spot for westbound traffic (together with merging), 4 intersections in close proximity, Butler Avenue has limited visibility
 - Should not be located where access is from major roads or in close proximity to a major intersection where there may be safety concerns or parking concerns in the street (all 3 of these are violated). The planned childcare facility is close to a major intersection (Rochdale and Alfred) and an intersection that is already under pressure (Butler Avenue and Alfred Road)
 - No access is to be permitted directly from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads (Butler Avenue is a cul-de-sac)
- In peak hour, getting out of Butler Avenue onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 228+ cars per day will have hugely negative impact on the surrounding neighbourhood (150% + increase in traffic)
- Visibility on Alfred Road for westbound traffic is poor. There is a bend in the road and a driver cannot see beyond the curve of the road on the left side.
- Travelling westbound between Rochdale and Butler, the traffic also merges which during peak hours causes congestion. This would be exacerbated.
- Given the limited parking, it is likely visitors and staff will park in Mayfair St on the north side of Alfred road. Trying to cross Alfred Road with young children is dangerous in peak hour.
- In the mornings, turning right onto Alfred from Butler Ave, the visibility can be poor depending on where the sun is (rising in the east). Sometimes you cannot see the road at all – looking to the east.
- If there was a backlog of vehicles trying to get back onto Alfred Road, it would not easily visible to vehicles coming from the south end of Butler Avenue due to the steep incline. In recent times, one resident had her parked car written off due to a car moving at speed from South to North along Butler Avenue
- The intersection directly west – Narla Road and Alfred is extremely busy and is in close proximity. Narla / Devon road are popular access roads to Claremont Centre rather than going via the 2 main roads (West Coast Highway and Davies Road). This will put more pressure and traffic on these local roads.
- Many people with dogs access Lake Claremont via Butler Avenue and for most of the Avenue, there is no footpath. With increased traffic, and the steep incline, this would increase the risk profile of the street.
- The traffic reports done by the developer's consultant states that there have been no accidents on Butler Ave which is inaccurate. In the last year alone there have been at least 2 accidents which were not reported to the police. One involved a bike and car (due to the incline of the street and limited visibility) and the other – someone trying to pull out of Butler Ave onto Alfred.
- There are more appropriate sites along Stirling Highway or near other commercial or education hubs for this type of development. Or location of childcare centres in school locations.
- Adding to further congestion and safety issues - the developer Transcore report on page 5 states that “waste collection **should** take place maximum twice per week outside childcare centre peak operation hours so to reduce the potential for internal site conflict between the waste collection vehicle and employees/visitors.” And “In this case it is also **recommended** that smaller vehicles such as vans be used for deliveries and all service vehicle activities to occur outside peak operating times so that parking bays are available for this purpose.” – there is no guarantee from the developer that this will occur and how can the Council effectively police this?
- The developer makes an unsubstantiated claim on page 8 that “As with similar centres, an overwhelming majority of patrons would originate from within the local area with only a marginal number of patrons arriving

from afar”. The community is already well serviced with more childcare centres than are required. None of the local centres are full.

➤ The internal space for the revised plans is a lot larger than the original scheme (nearly 30 sqm larger) and much larger than legally required – why? Logic would indicate that the developer clearly has planned to increase the size and scale of this facility in the future beyond what it is today.

Space	Number of Children	Age group	Area Provided (sq m)	Area Req. (3.25 sqm child)	Surplus area (sq m)	Max no. (3.25 sqm child)
Activity 01	8	1-2yrs	55.44	26	29.44	17
Activity 02	8	0-1yrs	47.29	26	21.29	14
Activity 03	10	2-3yrs	63.11	32.5	30.61	19
Activity 04	19	3-5yrs	61.98	61.75	0.23	19
Activity 04	20	3-5yrs	101.21	65	36.21	31
TOTAL	65		329.03	211.25	117.78	100

In this case of 100 kids transportation every day in the future rather than 65, in peak hour, getting onto Alfred Road is difficult due to high volumes of traffic. The impact of additional 322 cars per day (161 in / 161 out) will have significant impact on the surrounding neighbourhood (300% + increase in traffic) and amenities

➤ The entry off Alfred Road could cause rear end collisions along Alfred Road and into the lights – should traffic get backed up trying to enter the car park with cars also reversing to get out via Butler.

In my case as the next door neighbor, the cars driving out from the two proposed new homes on 160 Alfred Rd will face higher risk to turn right to east direction onto Alfred Rd with the higher volume of the traffic with this child care centre especially during the peak hour. With the second version of design, the main car entrance this proposed child care centre is from Alfred Rd, which also make the access to Alfred Road turning left more dangerous and difficult during the peak hour.

In addition, the current two-level building design is worse than before and our privacy is at risk with the overlooking windows above. Because of the easement design of our future building design, we have to leave enough space in front of the house, north of the land adjacent to Alfred Road and make the main house site to the south end, which has to be now side by side to the proposed main building of the child care center.

As proposed outdoor uncovered playgrounds of the child care center are now designed directly next (not like to the south boundary there is a wide distance to the south side neighbor and the outdoor play area is covered) to lot 1 (160A Alfred Rd) the new home site, the future family can't enjoy quiet lives from 6.30am to 6pm due to the obvious noise problem, which is impossible to deny even with the icy cold data analysis. The proposed outdoor playground area at the east side actually covers the main area of future residential living (side by side actually), which means the future family will have to suffer the noise if the child care center starts running considering its size of more than 65 kids or even more because they have more than enough internal space. We are normal human beings and have the right to live in peace, not fighting everyday with the noise problem which can be prevented from the beginning and the innocent children shouldn't bear any potential anger or hatred relying on the tolerance of the future neighbors. As proud Australian citizens, we should be keen to build up our community in harmony and try our best to avoid any potential conflict or dispute.

As a fact, a play area immediately adjacent to my property is non-compliant with state planning guidelines WAPC Planning Bulletin 72/2009 which states play areas shall not be adjacent to neighboring properties.

As a conclusion, I ask that the Council strongly reject this application and provide a compelling case to MWJDAP to also reject this inappropriate application. I look forward to your response.

Sincerely,

From: Kynan Smith <Kynan@lenoxhill.com.au>
Sent: Friday, 29 November 2019 11:17 PM
To: Minister.Saffioti@dpc.wa.gov.au; david.honey.cottesloe@mp.wa.gov.au; celia.hammond.mp@aph.gov.au
Cc: Town of Claremont
Subject: 162-164 Alfred Road development proposal [Please read in full]
Attachments: Minister Saffioti MLA - Please Help Stop Dangerous Development; Z&K Randell 162-164 Alfred Rd Objection.pdf; Z&K Randell 162-164 Alfred Rd Objection_Summary.pdf; 1901B50 191124 Objection Grounds DRAFT.PDF

Categories: Sherralee

Hello, it should be noted formally that I am in objection to the proposed development at 162-164 Alfred road that has been rejected by the TOC and JDAP (1st round) and now being appealed by developers via SAT.

If you are interested in the technical reasons why I am in objection, please contact \ refer to the submission made from Chris Mellarch mellarch@bigpond.com (attached) **Attachment 1**

If you are interested in the safety reasons why I am in objection, please contact \ refer to the attached email from Jane Muirsmith **Attachment 2**

If you are interested in the impact as to why I am in objection, please contact \ refer to the submission made from Zane Randell zrandell77@gmail.com who will live next to the development (attached) **Attachment 3**

If you are interested in my personal plea as to why our electorate should get involved in stopping this development once in for all please see below.

The community in general is not in objection to development. We as a community are in objection to this specific development being undertaken at this location by the developer. The purpose of the circumvention of existing planning laws is a balancing act between that where the benefit of such development outweighs the impact to the community **"beyond a reasonable doubt"**. The original and now subsequent proposals have only shown their true colours that their intent to develop on this block is for the purpose of commercial benefit and not that of a commercial venture which benefit will outweigh the impact to the community. All that is been provided by the developer is circumstantial evidence around demand for a childcare centre and a bias account of its impact on the surrounding community (specifically around the impact and safety risk of the imposing traffic of the area). When given the opportunity to resubmit, the developers only made two changes post a mediation hearing via SAT 1) an entrance onto Alfred road which does not comply with Main Road Standards given the intersection, and 2) have reduced the number of kids but had increased the square footage available for use. Based on this I am concerned that the developers have made no effort to amend the proposal in the best interest of the community and will continue to pursue something until they get what they want – without consideration of the impact it will have on the community. The existing proposed development does not merit special consideration for the existing planning laws to be circumvented and should be rejected in full (as is) with no further avenue for resubmission.

Thank you for consideration of this matter.

Kynan Smith
Butler Avenue Resident
Swanbourne

DRAFT

Memorandum

To	Planning and Development	From	Chris Mellor
Company	Town of Claremont	Pages (including this page)	
Project	162 & 164 Alfred Rd Child Care Centre	Date	November 2019
Subject	Grounds for Objection to Proposal	File Code	1901B50 191124 Objection Grounds

We have reviewed the proposal for a 65 place Child Care Centre at 162 and 164 Alfred Rd against WAPC Planning Bulletin 72/2009 Child Care Centres (PB72), Town of Claremont Local Planning Scheme 3 (LPS3) and Local Planning Policy 206 - Child Care Centres (LPP206)

The Centre is a commercial facility located inappropriately in a residential area

PB72 section 3.2 Objectives states that one of the objectives of the WAPC policy is to

"minimize the impact of a child care centre has on its surrounds, in particular on the amenity of existing residential areas."

The proposed commercial centre is located inappropriately in an existing residential area on land zoned as Residential R20. In LPS3 Table 1 a Day Care Centre is listed as "SA" in an area zoned Residential. This means that in exceptional cases only the Council may specially approve a day care centre where certain conditions are satisfied, including the following:

"any building to be erected on the land will not have any adverse or detrimental effect on the residents or on the amenity of or the properties in the locality".

This Centre is not a small local one that will have minimal impact but a 65 place, 12 minimum staff two storey commercial Centre that will cater to parents from out of the immediate area. The size, scale and form of the building, the large inadequately screened car park and access way and the excessive amount of traffic and parking generated will all be detrimental to the amenity of the surrounding residential area such that special approval should not be granted.

LPP206 notes that preferred locations for centres are on:

"... lots zoned "Local Centre", "Town Centre", "Highway", or "Educational", or on "Residential" lots immediately adjacent to these zones,

The site does not comply with this provision as it is not immediately adjacent to any of the listed uses and the adjoining residential use is not compatible with a commercial Centre. The nearest education facility, Swanbourne Primary School, is isolated from the site by busy Narla Road and is over 400m from the site to the school buildings by the shortest route. If the manned Narla road pedestrian crossing is used the distance to the school buildings is in excess of 600m.

The visual appearance of the child care centre is inappropriate

PB72 section 3.5 Design of Centres requires that:

"... In the absence of any specific provisions, the visual appearance of the development should reflect the character of the area, enhance its amenity ..."

LPS3 Clause 46 requires (among other things) that development in the Residential zone shall have regard to the following objectives:

(3) the continuation of the domestic scale and architectural character of the area of the proposed development;

(4) the preservation of the traditional housing character of the Zone;

LPP206 states

"Visual appearance of developments should reflect the character of the area, enhance its amenity..."

DRAFT

Memorandum

The proposed large scale commercial Centre is not compatible in scale, appearance and operation with residential uses. The centre does not continue the domestic scale of the street as it is a taller and far larger building and car park than any adjacent house..

The Centre is 21.6m long facing Butler Ave and is 24m wide facing Alfred Rd , both dimensions being larger than the width of a standard block frontage in the area and far wider than the typical house frontage. The area of paving required for parking and access is in excess of 670 sq m which is 80% of the area of a standard block in Butler Ave. The roof is excessively large and the design language associated with the framing for the large first floor play areas is heavy and out of context with a residential area and the weatherboard cladding is not typical.

The physical size of the Centre has increased since the previous application despite the reduction in the number of places offered. The original single level proposal was for a 624 sq m building with an additional 190 sq m of external covered Play space. This proposal included 292 sq m of internal Activity space for the 87 place offered.

The new two storey 65 place proposal is for a larger 635 sq m building with an additional 238 sq m of external covered Play space, much of which is located on the first floor. Despite the reduction in places by 22 the internal Activity space has increased to 330 sq m, which is enough for 100 places, 35 more than is proposed and more than has been used to assess staff numbers, car parking requirements and vehicle movements. The excess of Activity space area is unexplained and results in a Centre that is at least 100sq m larger than necessary. The roof area of the two storey proposal, including first floor covered play areas is a 580sq m making the Centre hugely out of scale with the adjacent residences.

The height of the two storey Centre is also excessive and out of scale with the adjacent residences. LPS3 Clause 40(3) nominates a maximum height of 6.6m in a Residential area, measured from the natural ground level. Most residences, including those in Butler Ave are far less than this maximum. The Centre is typically the maximum permitted 6.6m high to eaves, but this has been measured to the ground floor level which is higher than the natural ground level.

The car park is inadequately screened from view from residences

LPS3 Clause 31 Car Parking Spaces (7) requires that:

"Where car parking spaces are located on land adjacent to the Residential Zone, the Council may require that those spaces shall be suitably screened from view from that Zone and planted in accordance with Clause 37A – Non-residential development abutting a Residential Zone."

LPP206 states:

"Landscaping shall not contain toxic plants, and be provided along street frontages with a minimum width of 2 metres compatible with adjoining residential properties and at a height which does not result in an access/visibility hazard at the access crossover."

The proposal provides one metre only of the car parking screening to Butler Ave and Alfred Rd, one metre less than is required. The 670 sq m of car parking and extended access way covers the whole frontage of the Centre to both streets and the activity and noise generated will be highly visible from residences with consequent loss of amenity.

The traffic impacts of the centre will be unacceptable

PB72 section 3.6 Traffic impacts states that a centre

"should be approved only if it can be demonstrated that it will have a minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users."

LPP206 notes that access is not permitted directly from:

"...Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads."

DRAFT

Memorandum

An Alfred Rd entry only for vehicles travelling west is proposed as well as a main Centre entry/exit from Butler Ave. Alfred Rd is a Distributor A road and the location of this entry is in a risky location that is obscured by the bend in the road, is too close to the Rochdale Rd traffic lights, and is in a dangerous zone where traffic is merging and where the afternoon setting sun reduces visibility. It is inevitable that accidents will result if this access is permitted.

The main entry if from Butler Ave which as a cul-de-sac and no through road is not permitted under LPP206 to provide access to the centre.. This entry is also only 35m from Alfred Rd which is less than is required by Figure 3.1 of AS/NZS 2890.1 Off Street Parking.

The traffic to the centre will generate excessive traffic, parking and queuing in Butler Ave which is a dead end residential street with a slope of 1:7 in the centre section. Twelve staff at least will be employed but only 6 staff parking bays are provided, one of which is a tandem bay.

The additional traffic generated will access Butler Ave though the intersection of Butler Ave and Alfred Rd. This intersection is already marginal at peak hours, as is the adjacent intersection between Narla Rd and Alfred Rd. The increased traffic will negatively impact on the amenity of Butler Ave and will exacerbate the shortcomings and risks of the junction with Alfred Road.

The need for a child care centre is not established

PB72 section 3.8 requires that:

"if there is a demonstrable impact on the amenity of an area or the level of service enjoyed by a community the applicant should prove the need for commercial facility."

LPP206 states:

'In order to assess the impact to the local community on the impact a proposed Child Care Centre has on the level of service of similar or approved facilities, applications are to include information on the level of existing (or proposed) services in the locality, proximity to other centres, population catchments for the proposed centre and the number of primary schools and kindergartens in the locality, together with the number of students at these facilities.'

No information has been submitted establishing the need for a child care centre in the location, especially not the need for a 65 place commercial centre located in an existing residential area.

LPP206 also states:

'Approvals should only be issued where it can be demonstrated that the Child Care Centre will have minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians, cyclists or road users.'

This report establishes that the proposal does not comply with this condition in many ways and that approval of the project would be at the direct cost of the amenity of residents of Butler Avenue and surrounding residential areas.

The noise impacts of the centre will be unacceptable

PB72 section 3.7 Noise Impacts requires that:

"where a child care centre is located adjacent to a noise sensitive area such as a houses, retirement villages and nursing homes, the noise generating activities of the child care centre such as outdoor playing areas parking areas and any plant or equipment are to be located away from the noise sensitive use. "

The noise of children playing may be a joy in small numbers, but the noise of many children from a 65 place Centre playing in first floor external play area is another case and the amenity of the immediate neighbouring houses at will be negatively affected.

Conclusion

The proposal breaches many of the planning regulations that are in place.

It is a commercial development of excessive size that is inappropriate on a site zoned residential and that is surrounded by existing houses.

The size and scale of the Centre is not compatible with the neighbouring residences.

The proposal will create significant traffic and parking in a quiet street that is partly steeply sloped, is a dead end and that has a problematic link with Alfred Rd.

The proposal is inappropriate, will significantly affect the amenity of the residential area surrounding it and should be rejected.

From: Kynan Smith <Kynan@lenoxhill.com.au>
Sent: Friday, 29 November 2019 9:25 PM
To: Kynan Smith
Subject: Minister Saffioti MLA - Please Help Stop Dangerous Development
Attachments: Scan2019-11-29_205804.pdf; CW1076100-TR- R004-B-Alfred Road TIA Peer Review.pdf

From: Jane Muirsmith
Sent: Friday, 29 November 2019 8:51 PM
To: Minister.Saffioti@dpc.wa.gov.au
Subject: Minister Saffioti MLA - Please Help Stop Dangerous Development

Dear Minister Saffioti

Please find attached my letter and traffic impact assessment report, for your information.

Yours sincerely

Kind regards

Janef

Jane Muirsmith
11 Butler Avenue
Swanbourne WA 2019
jane@lenoxhill.com.au

29 November 2019

Ms Rita Saffioti MLA
Minister for Transport, Planning and Lands
9th Floor
Dumas House
2 Havelock St
West Perth WA 6005
Email: Minister.Saffioti@dpc.wa.gov.au.

Dear Minister,

PLEASE KEEP OUR COMMUNITIES AND ROADS SAFE.

RE PROPOSED DEVELOPMENT AT 162-164 ALFRED ROAD MOUNT CLAREMONT

As a member of the community I have admired the work that you have undertaken in your portfolio to upgrade the infrastructure in WA, promote infill, improve safety and work to bust congestion.

I am writing to ask you to please intervene in a development which is currently in SAT which is proposing a large scale commercial child centre on an intersection and road, which is already under significant duress (and is in a residential zone).

To that end, I include a link to a video of the intersection taken on 4 November at 8:15am. You will see cars jumping up on the footpath, kids weaving behind the cars and heavy traffic flow. Can you imagine if you had an additional 60 to 80 cars wanting to get in and out?

https://www.youtube.com/watch?v=Pt3_D_bziT8

As Minister for Planning I know you would be appalled to know that any development would go ahead, under your watch, that would have safety and traffic operational implications – which will likely result in a death on this stretch of road in the future.

In the last quarter alone, there have been 3 serious accidents along Alfred Road in Claremont. In particular, a local boy was in critical condition after being hit by a car, even though he was fully compliant with the traffic lights. Jackson is pictured below.



To help stop this development, the local residents have commissioned a traffic safety impact assessment which I enclose for your information and understanding.

The developer, the Caratti family are currently spending thousands of dollars on consultants to get this development approved by JDAP and SAT. It has been extremely intimidating and stressful. I find it incredulous how the community must now fight for their voice to be heard due to the planning process that that now exists in this state.

We ask that you as Minister for Planning intervene in this matter.

I look forward to your response.

Sincerely,

Jane Muirsmith

Technical Memorandum

Title	Proposed Childcare Centre 164 Alfred Road, Swanbourne – Review Transcore’s Revised TIS		
Client	Residents Group of Mount Claremont - Swanbourne	Project No	CW1076100
Date	9/12/2019	Status	Rev C
Author	Edmond Hoang	Discipline	Traffic and Transport
Reviewer	Desmond Ho	Office	Perth

1 Background

Cardno has previously been commissioned by “The Residents Group of Mount Claremont - Swanbourne” to undertake a review of the revised traffic report prepared by Transcore for the proposed Childcare Centre to be located on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont. In addition, Cardno also reviewed the responses provided by Transcore and undertook relevant SIDRA network modelling to obtain a better understanding of the impact of traffic operations at both the Butler Avenue/Alfred Road and Alfred Road/Rochdale Road intersections.

A revised traffic impact statement (dated November 2019) has recently been prepared by Transcore for the abovementioned site and Cardno were again engaged to undertake a review thereof.

Cardno acknowledge the views and responses provided by Transcore, however upon further assessment it is prudent to raise issues of concern (including issues mentioned in previous reviews which have not been addressed in the November 2019 report) which is detailed in the following sections of this technical memorandum. The issues relate to the impact on safety aspects and the potential negative impact on traffic operations at the Alfred Road/Rochdale Road and Alfred Road/Butler Avenue intersections.

2 Parking Review

Cardno has reviewed the parking provision for the child care centre against the agreed upon parking rates for staff and visitors. The parking provision appears to be compliant with the parking requirements.

3 Sight Line Assessment

Cardno has reviewed Transcore’s sight line assessment for the Alfred Road/ Butler Avenue intersection and acknowledges that the sight line calculations would appear to be appropriate although the use of the 85th percentile speed instead of the design speed is questioned. Alfred Road is posted 60km/h so the design speed would be 70km/h. Hence the SISD associated with a 70km/h design speed is 151m.

Transcore’s report indicated that a SISD of 95m was determined at the Alfred Road/Butler Avenue intersection. A Site visit was conducted to confirm whether the sight distance is achieved without any significant obstructions to visibility.

Visibility to the west adequately achieves a sight distance of 95m. The inclining road also provides better visibility of oncoming vehicles from the west at the abovementioned intersection (refer to **Figure 3-1**).

Visibility to the east is hindered by large trees located along the verge which affects visibility of oncoming eastbound vehicles as shown in **Figure 3-2**. This is further impaired by the slight curve along the road and the declining gradient in the direction of the Alfred Road/Rochdale Road signalised intersection.

The powerline pole along the southern side of Alfred Road has since been removed but the sight line issues still persists as shown in **Figure 3-3**. Cars are briefly visible in the gaps between the verge trees however this is not a reliable method of observing oncoming vehicles from a safety perspective, especially for right turning vehicles as they would need to consider traffic from both directions. Therefore, in its current arrangement, a 95m sight distance to the east is not achieved as verge obstructions and the geometric layout of the road hinders driver visibility. As Transcore's assessment was conducted under the extended design domain (EDD) where the SISD is reduced, there are serious concerns when this reduced SISD is not met. Cardno is still concerned that the increase in traffic due to the proposed development could potentially exacerbate the safety issues at this intersection.

Figure 3-1 Visibility to the west of Alfred Road/Butler Avenue



Figure 3-2 Visibility to the east of Alfred Road/Butler Avenue



Figure 3-3 Visibility of cars to the east of Alfred Road/Butler Avenue



4 Intersection Warrant Assessment

Cardno has undertaken an intersection warrant assessment based on the Guide to Road Design - Part4A and *Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections*.

A warrant assessment for a safe intersection design in accordance with the Austroads/Main Roads guidelines was not provided. Therefore, Cardno has undertaken an intersection warrant assessment, using the SIDRA output traffic flows provided by Transcore to assess the relevant intersection treatment required for this intersection. The following analysis is based on Austroads requirements which is similar to the Main Roads WA intersection warrant assessment. The methodology used in Main Roads WA intersection warrants differs slightly although it generally provides similar results (in this case, the only difference is MRWA's methodology for Option 30/70 during the PM peak requires an AUR treatment).

4.1 Turning Volumes

Figure 4-1 and **Figure 4-2** show the turning volumes obtained from SIDRA output results provided in Transcore's report for the intersection analysis for the post-development scenario for the critical AM and PM peak hour periods. These turning volumes include both the existing traffic as well as the estimated trips generated by the proposed development. It is mentioned in the Transcore report that two distribution scenarios were assessed (Option 30/70 and Option 70/30). The intersection warrants for these two scenarios have been assessed.

Figure 4-1 Post Development Turning volume (30/70 Option)

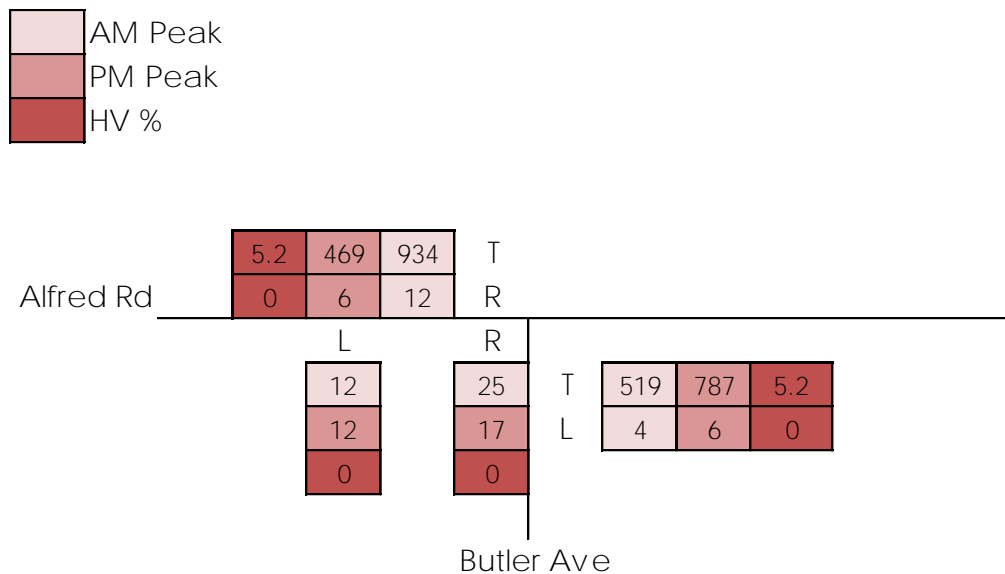
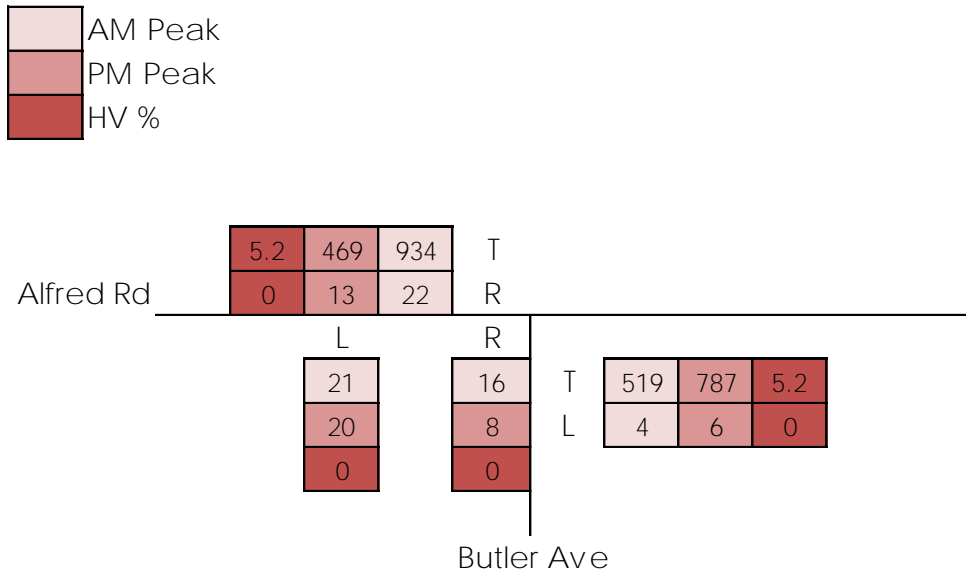


Figure 4-2 Post Development Turning volume (70/30 Option)



4.2 Austroads Intersection Warrants

The existing intersection layout has been reviewed in accordance with the *Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections*.

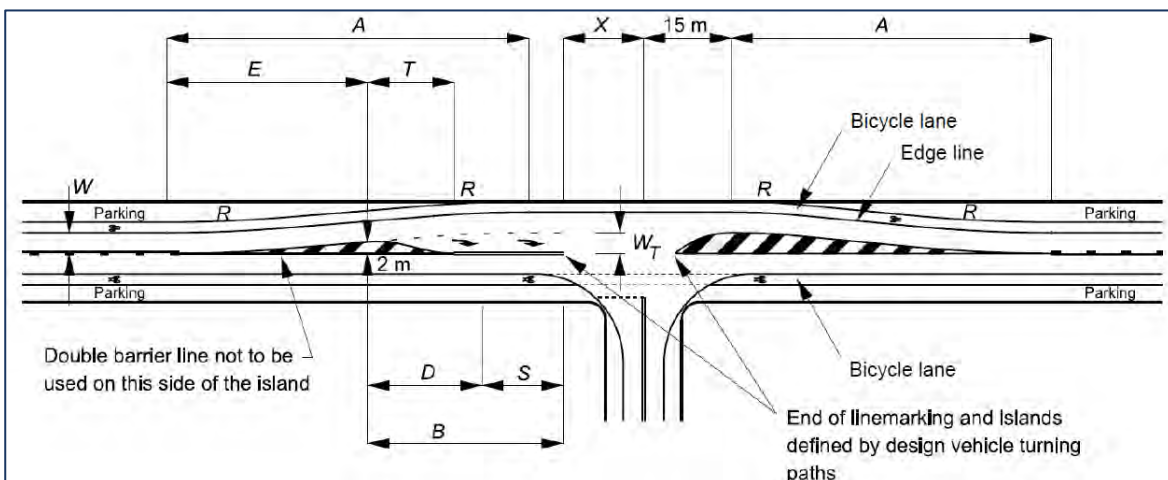
The warrants for this priority intersection are provided in a separate document.

Based on the total volume of turning traffic (with the proposed development traffic) at the Alfred Road/Butler Avenue intersection, the assessment indicates that a channelised right turn (CHR) and basic auxiliary left turn (AUL) treatment for the post-development scenario are required for the Option 30/70 and Option 70/30 distribution scenarios. Furthermore, under the Main Roads WA methodology an auxiliary right turn (AUR) and basic auxiliary left turn (AUL) treatment for the post-development scenario is required for the same distribution scenarios. The provision of these channelising and auxiliary lane treatments would likely require significant upgrades and road reserve at the Alfred Road/Butler Avenue intersection.

Additionally, a scenario which includes 70% right turn into Butler Avenue and 70% right turns out of Butler Avenue was also assessed which showed similar results for the abovementioned scenarios.

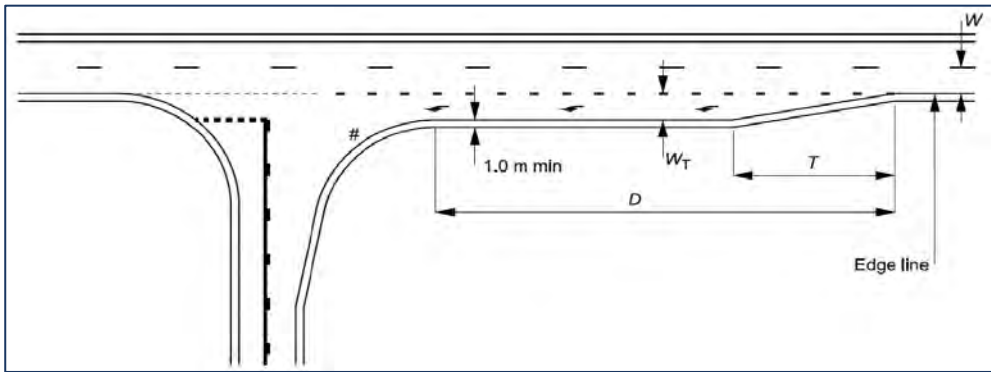
The Austroads general CHR(S) and AUL(S) compliance design is to be in accordance to the diagrams illustrated in **Figure 4-3** and **Figure 4-4**.

Figure 4-3 General Layout of CHR(S)



Source: *Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections* (Figure 7.7)

Figure 4-4 General Layout of AUL(S)



Source: Austroads Guide to Road Design – Part 4A – Unsignalised and Signalised Intersections (Figure 8.3)

5 Intersection Analysis

5.1 Review of SIDRA Results

A review of Transcore's SIDRA results show that the operation of Alfred Road/Rochdale Road intersection improves slightly with the introduction of development traffic which is counter intuitive to how traffic operations generally work. The western and eastern approach show minor improvements to delays and queues while the northern and southern approaches show a slight increase in delays and queues. Conventionally, additional traffic added to the road network would result in a decline in intersection performance (in cases where no intersection improvements have been implemented), though it is acknowledged that other factors can potentially lead to improvements to traffic operations (such as modified/optimised signal timings and phasing).

Since the SIDRA models were not provided, Cardno were not able to check and confirm the input parameters, hence there is a need for explanation as to the cause of the abovementioned inconsistency.

5.2 Intersection Assessment

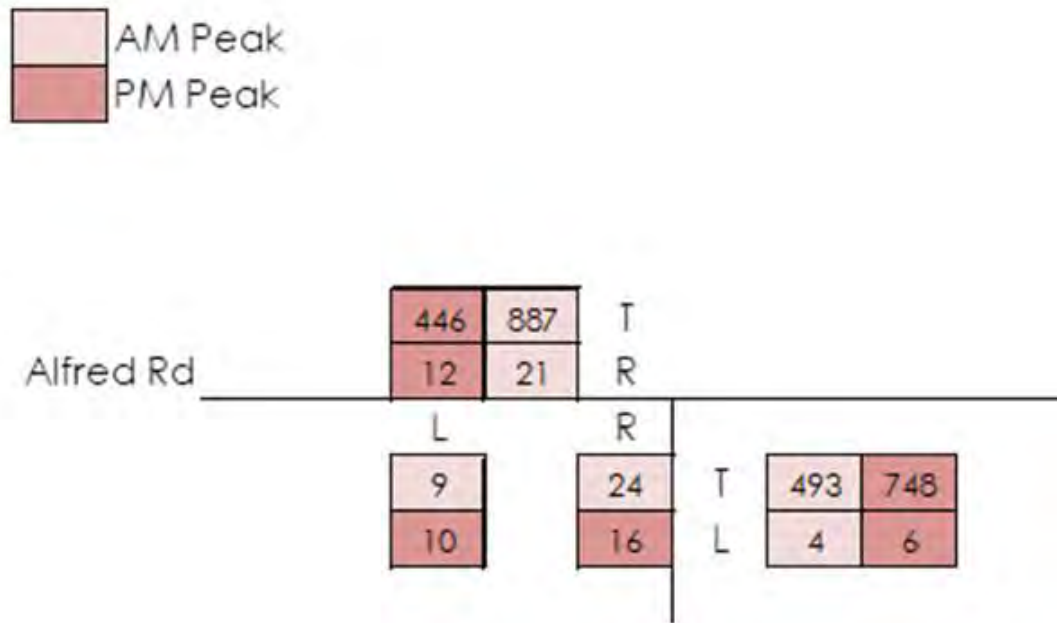
Cardno has modelled the two intersections (using the SIDRA modelling analysis tool) as a network to assess the impact of the signalised intersection on the operations of the Alfred Road/Butler Avenue intersection.

As the SIDRA assessment files from Transcore are unavailable, the following assumptions were used in the assessment:

- > The background traffic volumes used in the assessment were extracted from the SIDRA results in Transcore's report.
- > The signal phasing and timing at the Alfred Road/Rochdale Road intersection is based on the information extracted from Main Roads Traffic Map.
- > It appears that a growth rate was applied at the Alfred Road/Butler Avenue intersection to estimate the traffic volumes in the opening year of the development which is standard practice. However, a growth rate does not appear to be applied to the Alfred Road/Rochdale Road intersection. Additionally, the opening year of the development and the growth rate cannot be determined from the information provided, therefore the following assessment uses the existing volumes with no background growth applied. It is likely that the anticipated volumes during the opening year will be higher and hence would have negative impact on the performance of this intersection.
- > Concern was raised by the "The Residents Group of Mount Claremont - Swanbourne" with regard to the traffic distribution used in Transcore's report. The following development traffic distribution has been assessed:
 - 70% turn right into Butler Avenue and;
 - 70% turn right out of Butler Avenue.

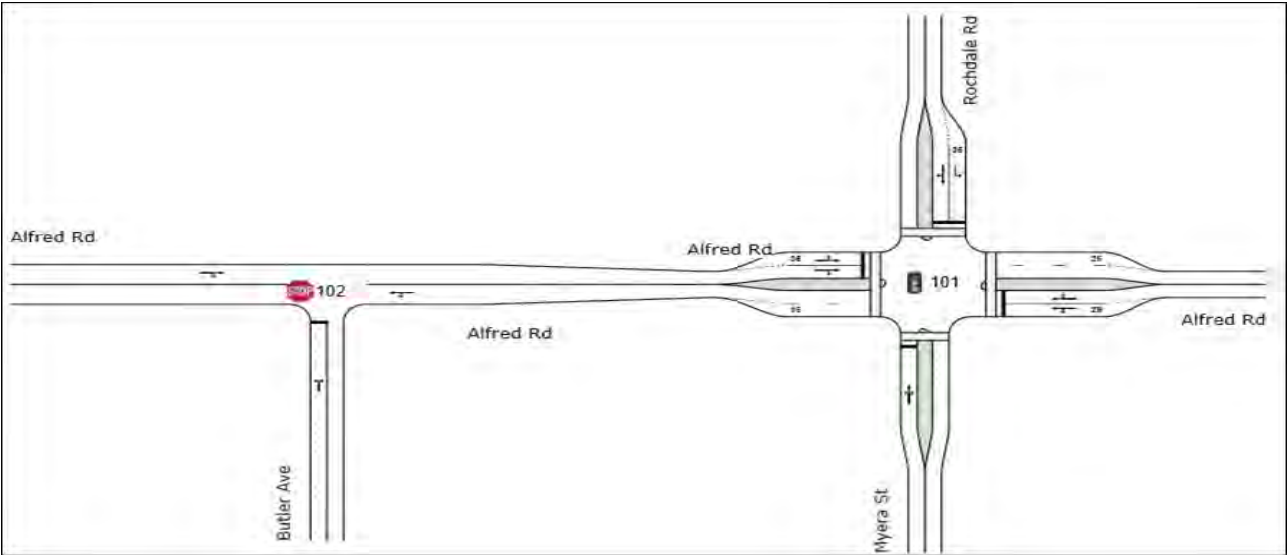
The total trips associated with the above trip distribution scenario is illustrated in **Figure 5-1**.

Figure 5-1 Total distributed trips



Alfred Road/Butler Avenue intersection and Alfred Road/Rochdale Road intersection modelled SIDRA network and intersection layout is illustrated in **Figure 5-2**. The performance of the intersection layout was then assessed for the normal weekday AM and PM peak hour period.

Figure 5-2 SIDRA Network and Intersection Layout



The SIDRA assessment of the network layout for the existing and post development scenario is summarised in **Table 5-1** and **Table 5-2**.

Table 5-1 Intersection Performance for Alfred Road/Rochdale Road

Intersection Approach	AM Peak Hour					PM Peak Hour			
		DOS	Delay (s)	LOS	95% Queue (m)	DOS	Delay (s)	LOS	95% Queue (m)
Myera St (South)	L	0.035	19.7	B	2.1	0.025	16.6	B	0.8
	T	0.035	15.1	B	2.1	0.025	12.1	B	0.8
	R	0.035	19.7	B	2.1	0.025	16.6	B	0.8
Alfred Rd (East)	L	0.065	13.2	B	5.8	0.116	14.5	B	5.9
	T	0.324	10.2	B	29.5	0.581	11.1	B	33.7
	R	0.324	16.4	B	29.5	0.581	17.1	B	33.7
Rochdale Rd (North)	L	0.156	20.3	C	11.4	0.062	17.6	B	2.5
	T	0.506	17.1	B	38.6	0.545	15	B	24.7
	R	0.506	21.7	C	38.6	0.545	19.5	B	24.7
Alfred Rd (West)	L	0.329	14.9	B	33.1	0.245	15.6	B	12.5
	T	0.814	16.9	B	112.7	0.346	10.1	B	19.7
	R	0.814	22.3	C	112.7	0.346	15.4	B	19.7

Table 5-2 Intersection Performance for Alfred Road/Butler Avenue

Intersection Approach	AM Peak Hour					PM Peak Hour			
		DOS	Delay (s)	LOS	95% Queue (m)	DOS	Delay (s)	LOS	95% Queue (m)
Butler Ave (South)	L	0.127	9.4	A	1.8	0.052	11.1	B	0.4
	R	0.127	17.6	C	1.8	0.052	13.5	B	0.4
Alfred Rd (East)	L	0.246	5.4	A	0	0.374	5.4	A	0
	T	0.246	0	A	0	0.374	0	A	0
Alfred Rd (West)	T	0.662	0.3	A	4.8	0.238	0.3	A	0.7
	R	0.662	9.5	A	4.8	0.238	10.6	B	0.7

This analysis confirms that queues are expected to extend beyond the Butler Avenue intersection from the Rochdale Road intersection as illustrated in **Figure 5-3**.

The queues on Alfred Road would have an impact on the vehicles turning right into and out of Butler Avenue. It is expected that the excessive queuing on this approach would result in a slight increase in delay and queuing on the southern approach of the Butler Avenue intersection and also impacting the Mayfair Street intersection.

Figure 5-3 Queue Distances



6 Access Arrangement

In accordance to the Town of Claremont's Policy Manual, *"Where crossovers intersect a footpath, the footpath will have priority and continue through the crossover. All new or reinstated footpaths are to be constructed to Town specifications and on the pre-existing alignment, unless directed otherwise by the Town."* Pedestrian priority will need to be shown at the crossovers.

6.1 Access along Alfred Road

Based on available traffic data sourced from Main Roads WA, Alfred Road is classified as a District Distributor A road and carries approximately 11,647 vpd in 2017/2018. A total of 1,206 and 1,118 vehicles in both directions was recorded during the morning (AM) and afternoon (PM) peak hour periods respectively.

In accordance to Main Roads' Road Hierarchy Criteria, frontage access on Distributor A roads is generally not desirable given that these types of roads facilitate high capacity traffic movement.

Additionally, the Western Australian Planning Commission (WAPC) childcare centre guidelines is not prescriptive with regard to the location of child care centres but does stipulate that *"access is not from a major road or in close proximity to a major intersection where there may be safety concerns"*. Given that Alfred Road carries relatively high traffic volumes and there are safety concerns and visibility issues associated with the proposed site, the provision of an access along Alfred Road would appear to be non-compliant.

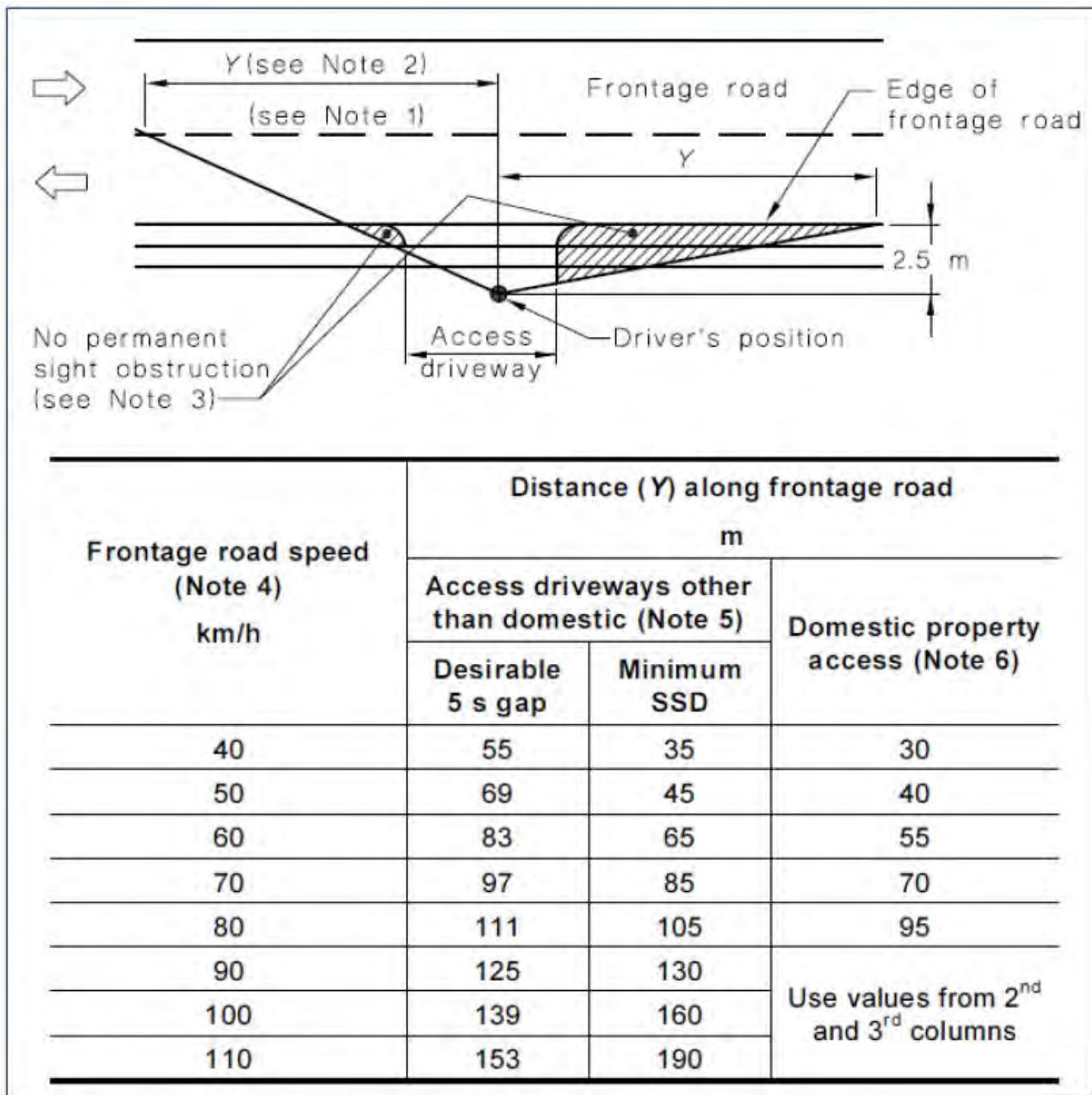
Additionally, the current design of the proposed left in only along Alfred Road will require additional traffic management measures to prevent vehicles from turning right into this access.

6.2 Access along Butler Avenue

Cardno has reviewed the location of the proposed crossover along Butler Avenue in accordance with the *AS2890.1 – 2004 – Off-street car parking standards*. According to Figure 3.2 of the *AS2890.1 – 2004 – Off-street car parking*, as shown in **Figure 6-1**, it indicates that the minimum stopping sight distance (SSD) of 45m is required for a frontage speed of 50km/h road for a non-domestic driveway.

Based on the revised drawings, the proposed crossover is to be located 40m from the Alfred Road intersection. Therefore, the sight distance for the proposed location of the crossover for the proposed development theoretically would appear to be inadequate in accordance to AS2890.1.

Figure 6-1 Sight Distance at Access Driveway



Source: AS2890.1 – 2004 – Off-street car parking

7 Conclusion

Based on this review, Cardno's concludes the following:

- > Cardno has reviewed Transcore's sight line assessment for the Alfred Road/ Butler Avenue intersection and acknowledges that the sight line calculations would appear to be appropriate although the use of the 85th percentile speed instead of the design speed is questioned. The SISD of 95m at the Alfred Road/Butler Avenue intersection is sufficient to the west but is insufficient for the vehicles from the east as visibility is affected by the road geometry and verge trees. The powerline pole along the southern side of Alfred Road has since been removed but the sightlines issues still persist. Cardno is concerned that the increase in traffic due to the proposed development could potentially exacerbate the safety issues at this intersection.
- > Based on the expected volume of turning traffic at the Alfred Road/Butler Avenue intersection, the intersection warrants indicate a channelized right turn (CHR)/auxiliary right turn (AUR) treatment and basic auxiliary left turn (AUL) treatment should be provided at this intersection.
- > Based on the SIDRA assessment, queues are expected to extend beyond the Butler Avenue intersection from the Rochdale Road intersection. The queues on Alfred Road would have an impact on the vehicles turning right into and out of Butler Avenue and will also impact the traffic operations of Alfred Road and the intersection of Butler Avenue and Mayfair Street.
- > The proposed crossovers for the child care centre will need to be designed such that the pedestrian path has priority.
- > The provision of a left in only access along Alfred Road is undesirable based on the WAPC and MRWA guidelines given the high traffic volumes along Alfred Street and safety concerns and visibility issues associated with the proposed site.
- > Based on the revised drawings, the proposed crossover is to be located 40m from the Alfred Road intersection. Therefore, the sight distance for the proposed location of the crossover for the proposed development theoretically would appear to be inadequate in accordance to AS2890.1.

In summary, the Transcore report appears to primarily focus on traffic capacity issues than all traffic safety related aspects. Cardno believes that the proposed development on Lot 162 and 164 Alfred Road, Swanbourne in the Town of Claremont will have a detrimental impact on the safety and traffic operations on Alfred Road and its intersection with Butler Avenue.

Zane and Kellie Randell
4 Butler Ave,
Swanbourne, WA 6010
E: zrandell77@gmail.com and kellie.swincer@gmail.com
M: 0429 571 639

29 Nov 2019

Town of Claremont
PO Box 54
Claremont WA 6910
toc@claremont.wa.gov.au

Attn: Planning and Development

Re: 162 & 164 Alfred Rd Swanbourne Proposed Child Care Centre

To Whom it May Concern,

We with our two young children at 4 Butler Ave, Swanbourne, which is immediately adjacent to the proposed development. We wish to object to the proposed development based on the negative impacts on safety, traffic and the existing residential amenity that would occur if such a large scale commercial development should proceed.

Attached is a detailed objection to the proposed child care centre and I summarise these issues here.

The amended proposal makes a number of compromises, including significant compromises to the optimal development of children as is detailed in the Noise Management and Child Supervision Policy. This policy has been developed to curb natural child behaviour and compromise development due to the location of the centre in a quiet residential area. The Policy includes such restrictive requirements for outdoor play and supervision that will be impossible for staff to comply with.

Whilst the number of children has been reduced from the original proposal, the area allowed per child is far in excess of what is required. A natural assumption is that the applicants aim to gain approval given the current proposal and conditions, then increase the numbers of staff and children to maximise the allowed area as such changes do not require approval once in operation.

The proposed centre will exacerbate existing safety risks along this stretch of Alfred Rd, including existing conditions associated with Butler Ave that will create serious safety risks for pedestrians and road users along Butler Ave and at the Butler Ave / Alfred Rd intersection

I have repeatedly cautioned about the various Human Performance safety risks that will be present and affecting drivers at various times during children being dropped off or picked up from this child care centre. The recent changes in the proposal do not alter these issues. Safety concerns resulting from the additional traffic in and out of Butler Ave will only be exacerbated and it will be a matter of when, not if, a person makes a slip or mistake and a tragic result occurs.

In my experience as a safety professional with considerable experience investigating serious workplace incidents, including many workplace fatalities and near fatalities, I can clearly see how this situation could lead to a serious or fatal accident occurring. My question to those with authority for approval or rejection of this development is should a child or other person be killed as a result of increased traffic from this development, who will bear this responsibility? How will authorities respond when they have already been cautioned about the risk? To individuals involved in the decision-making process, if this was your child struck by an inattentive driver, or your child or

grandchild was struck and killed crossing the road by a driver in a rush to drop their child at day care and get to their work meeting on time, what would your decision be then?

For these reasons, we ask you to please consider the safety of the community and child care users, consider the existing quiet, enjoyable residential amenity, and consider the wellbeing of children attending child care centres and reject this proposed development.

Sincerely yours,

Zane and Kellie Randell

29 November 2019

Zane and Kellie Randell
4 Butler Ave,
Swanbourne, WA 6010
E: zrandell77@gmail.com
M: 0429 571 639

Attn: Planning and Development

Re: 162 & 164 Alfred Rd Swanbourne – Proposed Child Care Centre

To Whom it May Concern,

Please refer to the below concerns for why we object to the proposed child care centre being approved.

Safety and Risk Management

This is a residential area, and Butler Avenue is a quiet cul-de-sac with 17 houses. The street has a footpath only for approx. 60m, after which pedestrians walk on the road to access the bushland, Lake Claremont reserve and mixed-use paths at the closed end of the cul-de-sac. This includes school children walking to and from nearby Swanbourne Primary School. The additional traffic associated with a commercial development with 65 children and 12 staff would create not only unacceptable increases in traffic in comparison to the existing low residential movements, but importantly would introduce serious safety risks for residents, local community and primary school children utilising the street as they currently do.

As an experienced safety and health professional Zane has previously provided risk assessment details regarding the intersection of Butler Ave and Alfred Rd where the risk of a serious permanent disabling injury or death was identified as a high likelihood. The reduction in numbers of vehicles with the recent changes does indeed reduce this likelihood, however the assessment remains that there is an unacceptably high risk of a serious injury or death as a result of a vehicle/pedestrian impact due to:

- pedestrians crossing Butler Ave along the footpath of Alfred Rd;
- pedestrians crossing Alfred Rd from North to South, including school children; and
- pedestrians walking up or down Butler Ave, in particular this risk is exacerbated by the steep blind crest and lack of footpath.

To support these concerns, recently taken footage along Alfred Rd during morning peak traffic (see YouTube: https://youtu.be/Pt3_D_bziT8) demonstrates:

- school children riding bicycles and walking behind cars on Butler Ave as they wait to turn into Alfred Rd traffic;
- cars driving up onto the footpath on Alfred Rd heading East to go around backed up traffic behind a car waiting to turn right into Butler Ave;
- cars travelling West along Alfred Rd veering into the opening of Butler Ave to go around cars backed up behind a car turning right into Mayfair St.

Furthermore, Butler Ave has already seen a rear end collision resulting from a car driving over the blind crest colliding with a parked car on the side of the road. This was unreported hence no record exists however residents in the street involved in the incident attest to the accuracy of this.

During recent months there have been two children struck by cars at the Rochdale Rd / Alfred Rd intersection. One boy who was crossing on the green pedestrian light was thrown onto the windscreen of a car, and another boy on his bicycle was struck by a car on Myera St next to the Alfred Rd lights.

There can be no doubt that section of road is already hazardous. An increase in traffic, particularly vehicles turning across traffic to enter and come out of a cul-de-sac with no other entry or exit will only exacerbate the problem and increase the risk to safety.

WAPC bulletin 72/2009 clearly states:

A child care centre would generally not be suitable where: S3.3. j) Access from a major road or in close proximity to a major intersection where there may be safety concerns.

This location has both. The most recent plans include an additional access from Alfred Rd, therefore in contradiction to the WAPC requirements, and given Butler Ave is a cul-de-sac the only other entry on Butler Ave is still via Alfred Rd.

Further, WAPC 72/2009 S3.6 states (it)

...should only be approved if it can be demonstrated that it will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users.

The above points and the YouTube video provided at https://youtu.be/Pt3_D_bziT8 clearly demonstrate this requirement cannot be met, and that this development would create a risk for children and families using the centre and increase the risk for pedestrians and road users.

Human Performance Implications

During presentations to MWJDAP and SAT, Zane has highlighted the implications of Human Performance on the existing safety concerns for Butler Ave and at the intersection of Butler Ave and Alfred Rd. These appear to have been ignored by the applicant in the recent revised proposal, so we feel it prudent to recap the issues here should personnel be reading this who were not privy to previous statements. Further detail to explain Human Performance is located at Annex A in this document.

Within the field of Human Performance there are ten (10) "Error Traps" or precursors to error. These are task related characteristics that increase the probability for error during a specific action. Given the location of the proposed child care centre and the activities involved for people travelling to and from (dropping children off or picking up), there are six error traps for drivers or pedestrians that may be present at any given time

- Stress
- Multi-tasking / high workload
- Time pressure
- Overconfidence
- Distractions
- The end of a work shift or an extended shift

The proposed childcare centre at the corner of Butler Avenue and Alfred Road in Swanbourne risks creating a number of opportunities where there may be significant risk to pedestrians and vehicle occupants.

An examination of these situations using Human Performance principles highlights these concerns and the potential increased risk to life.

Situation 1 – Vehicle turning from Butler Ave into traffic on Alfred Rd

Potential Error Traps:

- Stress (anxious child not wanting to be left; stressful morning getting child ready as well as family / self)
- Multi-tasking / high workload (planning the day; mentally preparing for meetings/daily activities; debriefing the day with child; mentally planning evening meal/schedule)
- Time pressure (running late to work/daily activities; hurry to get home at end of the day)
- Overconfidence (used to driving; never had anything go wrong at this intersection before)
- Distractions (child or children talking/yelling; heavy stream of traffic flowing in both directions; school children crossing Butler Ave and/or Alfred Rd in either East or West direction; fast moving vehicles trying to make it through the controlled intersection at Rochdale/Alfred Rd)
- End of a work shift/extended shift (night shift workers / picking up after long day shift; parents with young children who wake frequently throughout the night)

In addition to Human Performance error traps in this situation is an increased risk due to the position of the sun being in a drivers eyes at certain times of the year whilst turning right (East) onto Alfred Rd early in the morning, and left (West) at sunset. As an example, at certain times of the year we commonly have to open the window and shield our eyes to see properly whilst turning onto Alfred Rd from Butler Ave.

Situation 2 – Vehicle driving South down Butler Ave to turn around at the cul de sac at the bottom of the hill

Potential Error Traps:

These would be very similar to Situation 1, with the addition of:

- Stress (or frustration, required to drive down Butler Ave to turn around)
- Time pressure (exacerbated due to the extra time required to turn around at the base of the hill on Butler Ave)
- Combined with the added risk of the blind crest on the hill

For both these situations the driver would be operating in either **Rule Based** or **Knowledge** mode. This has an associated error rate of between 1:2 - 1:100. The driver is typically driving based on habit (skills based) which is *non-thinking*, however in these situations they are also reliant on knowledge which they do not have available upon which to make a decision as to what action they will take.

A driver turning into Alfred Rd from Butler Ave does not know about vehicles coming in their direction from the controlled intersection at Rochdale Rd until the vehicle is approx. 40m away. This

provides approximately 2 seconds for the driver to decide whether they will accelerate to turn in front of the vehicle or wait for a longer break in traffic (it is worth noting, this is the absolute minimum time allowed by Main Roads WA versus the recommended minimum of 2.5 seconds). Nor do they know what action pedestrians are going to take crossing Butler Ave or Alfred Rd, and it is common for pedestrians to make sudden decision to dash across slim gaps in traffic.

In Situation 2 the driver is approaching a blind hill with no knowledge of what is over the crest, which on a street with no sidewalk for pedestrians, and frequent use of the road for school children and local residents/community members poses a significant risk as they often having to move into the middle of the road to go around parked cars (which would also be increased with the child care centre).

The residents of Butler Ave have existing knowledge of these risks and already cautiously manage them on a daily basis. With the significant increase in traffic from the proposed child care centre, the likelihood of an error being made is increased and dramatically increases the risk of a serious accident occurring.

Noise Management and Child Supervision Policy

The applicants have provided a "Noise Management and Child Supervision Policy". This Policy and Plan is poorly written with a multitude of errors and incorrect information. It also has contradicting statements, in particular a statement that says the philosophy of the Centre is 'free flow' with respect to outdoor play for children attending the centre, yet it then restricts set hours per day when children will be allowed outdoors.

A maximum of 3 hours per day has been allocated for children to be outdoors participating in 'free play'. Restricting outdoor play is in conflict to current recommended practice for early childhood development and not in the best interest of any child attending the Centre.

When outdoors, children will have to follow strict conditions under which they are allowed to play and the Policy states that staff will be placed at 'supervision' points to keep children away from the boundary fences and from making noise. Apart from being an absurd practice for any child care centre, it is also unrealistic that 1) you can stop children making noise, banging items to make music and from being children and playing loudly, and 2) having dedicated staff to be in supervision points is also unrealistic as we know as soon as a child needs assistance, to go to the toilet or needs changing then that staff member is out of action.

The fact that a Child Care Centre needs this type of Policy and Plan suggests it will be a sad and depressing place for any child attending the Centre and all due to it being built in the WRONG location. Additionally, how long will this 'Policy & Plan' actually remain effective and how it is to be policed? It is more than likely that the 'Policy and Plan' has been drafted in order to minimise "impulsive" noise characteristics in the outside play areas for the purpose of the Environmental Acoustic Assessment so as to achieve approval, and the Policy will subsequently be amended, removed, ignored or simply impossible for staff to abide by upon opening or over time. As immediate neighbours, it will then be upon us and other nearby residents to repeatedly complain, however by that stage the problem already exists and will be impossible to rectify.

Rather than the applicant identifying a suitable location that *optimises the development of children*, this Policy and Plan significantly *compromises normal childhood activity* and will *negatively impact their development* because of restrictions due to the location in a quiet residential area.

This all further supports the community view that the proposed Centre should not be built in this residentially zoned area.

Impact on Family and Residents

As we have previously stated in regard to this development, we deliberately chose to live in a location that was zoned residential, with low traffic volumes, quiet, and safe for our children to play outside and walk down the street to the nearby bush, lake and school, as many other local children and residents do. Should it go ahead, this development will have a significantly detrimental impact on our quality of life as the existing enjoyable, residential amenity will be dramatically impacted.

We acknowledge that in the revised plans, the applicants have taken steps to reduce the noise disturbance on my property. It is noted however that there still exists a child play area immediately adjacent to the Eastern boundary, placing it alongside the property at 160 Alfred Rd. This is non-compliant with local planning requirements which prohibit play areas being adjacent to neighbouring properties and I can only assume will have a detrimental impact on anyone living there.

Further to the above, the original proposal was for 90 children. This revised proposal allows for a far greater area per child than is required. Whilst this may be altruistic in nature, it is highly likely that the application is made for the purpose of gaining approval under the proposed conditions then making subsequent increases in children and staff once the centre is in operation. As there are no requirements for approval for such changes, there will be little to prevent this occurring.

For the above reasons, we ask you to please reject the application for this child care centre.

Sincerely yours,

Zane and Kellie Randell

29 November 2019

Annex A

What is "Human Performance"?

Human Performance is the study of how and why people behave or act a certain way. It is about understanding how a culture and environment interact with various personal factors (such as ability, knowledge, distraction, fatigue etc) to influence an outcome – typically safety related.

The field of Human Performance has evolved through integrating psychology and the framework for understanding error developed by Dr James Reason.

Errors typically occur through two modes: slips and mistakes. Slips are errors that occur through routine activities that require little active thought processes. Mistakes are errors that occur during activities that require active thought processes to understand or make decisions about the situation and our response to it.

Further, there are typically three modes of operating (performance modes) through which human error occurs. These are based on the level of familiarity the individual has with the activity or task. If an individual is familiar with a task they typically pay little attention to it. Conversely, if an individual is unfamiliar with a task or situation they will usually be more attentive. The three (3) performance modes are:

- Skill based: routine actions in a familiar environment or situation, such as driving a car. People simply perform the required action with little thought.
 - In this mode people are acting out of memory and habit. People typically do not consciously think about the actions they are performing.
 - Errors are usually the result of lack of attention or awareness to the local/immediate situation
 - The error rate is 1:1,000
- Rule based: performance of a number of specific actions influenced by a series of recognised circumstances.
 - A person is consciously assessing the situation and takes action based on recognised patterns or familiarity with the situation. E.g. In a car at traffic lights a red turning arrow goes off and the remaining green light indicates it is OK to proceed if no oncoming traffic, we therefore make the decision to move forward depending on the traffic situation
 - Error rate 1:100
- Knowledge based: this is the least familiar type of action and relies on some specific knowledge about the situation.
 - This requires a person to analyse, problem solve and use judgement. These actions are strongly influenced by assumptions where information is missing.
 - A person does not know whether they have all the necessary information upon which to make the correct (or safe) decision
 - E.g. Driving a car and we see a person standing on the side of a busy road. We do not know if they are going to remain there or try to dash across to the other side in between traffic
 - Error rate 1:2 – 1:10

From: Helen chatfield <barratt3@bigpond.com>
Sent: Friday, 29 November 2019 11:39 PM
To: Town of Claremont
Subject: Dangerous Development at 162-1

Dear Town of Claremont

Please stop the Dangerous Development of the Child Care Centre on the corner of Alfred Road and Strickland Street.

Alfred Road is busy already and Strickland is becoming busy with people bypassing Rochdale if the lights change – so they can save a few minutes of time stopping at the lights.

It is often already difficult to exit and enter Strickland Street from Alfred Road – having this Child care centre there will only increase the traffic hazard especially being so close to the lights.

I feel it is wrong to have a child care centre so close to a set of traffic lights which will hold up the already busy traffic flow.

Kind regards

Helen Chatfield

40 Strickland Street
Mount Claremont WA 6010

From: Robyn Kennedy <newrob556@yahoo.com.au>
Sent: Saturday, 30 November 2019 5:57 PM
To: Town of Claremont
Categories: Sherralee

Att: Planning and Developement

RE: Proposed Child Care Center

I wish to make a firm no to the plans for the proposed building of a day care centre on the properties 162-164 Alfred road Mt Claremont .

It is a very dangerous intersection and there are blind corners with no parking for the pick up and drop off of children. It would not be safe.

I live very close to the intersection of Rochdale and Alfred Roads at 165 Rochdale road and even I have problems coming onto Rochdale road.

I would think the extra traffic and small children would be high risk for all concerned.

Robyn Kennedy
165 Rochdale Road
Mt Claremont

Sent from Mail for Windows 10

From: Janice MacKenzie <janicekmackenzie@gmail.com>
Sent: Saturday, 30 November 2019 10:31 PM
To: Town of Claremont; Minister.Saffioti@dpc.wa.gov.au
Subject: re 162-164 Alfred Road

Categories: Sherralee

Good Day,

I live in Finch Way Mt Claremont therefore Alfred Road is my access to points south, east and west.

I do think that if this development goes ahead there needs to be major roadworks done providing access to and from the premises.

Feeder lanes from both east and west would facilitate access and egress. At present traffic banks up if a vehicle travelling west wishes to turn right into Mayfair causing frustration as traffic must come to a halt whilst waiting for east bound traffic to ease. In peak hours this can cause a bottleneck for traffic travelling west.

With the added comings and goings from the proposed development the current conditions would be problematic on a main thoroughfare.

Thankyou for the opportunity to contribute to this issue.

Kind regards,

Janice MacKenzie

From: Sarah Vaughan <vaughan_sarah@hotmail.com>
Sent: Sunday, 1 December 2019 9:54 AM
To: Town of Claremont
Subject: Proposed Child Care Centre 162 & 164 Alfred Rd

Categories: Sherralee

To Whom It May Concern

Attn: Planning and Development
RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

I am a resident of the area and I support the application for the Proposed Child Care Centre.
I believe the development will be an added benefit to the community.

I have a young family and have noticed that there is a shortage of child care centres in the area. This is a much needed development for the community.

I do not believe there will be any negative effects of such a development.

I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves, they are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development.

Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development.

Regards,

Sarah Vaughan
0448 185 320

From: Penelope Kapinkoff <pen_v@hotmail.com>
Sent: Sunday, 1 December 2019 10:00 AM
To: Town of Claremont
Subject: RE: 162 & 164 Alfred Rd, Swanbourne. Proposed Child Care Centre

Categories: Sherralee

Attn: Planning and Development

I am a resident of the area and I support the application for the Proposed Child Care Centre.

- I have been following this story in the post and as I am a resident of the area I thought I would put forward my support. It seems that people who are against this development are only thinking of themselves, they are worried about a few extra cars on the street and the noise of happy children playing in a playground. I believe we need to think of the greater community as a whole and who will benefit from such a development. Young families and children are going to benefit the most out of such a development. Research has shown that children who attend childcare centres from an early age develop better social skills. Therefore, the more childcare centres the better, I vote YES for this development.

Regards,
Penny
0420787804

Sent from my iPhone

136a Alfred Road
Swanbourne 6010
Western Australia
tamanded@iinet.net.au

20 May 2019

Planning & Development
PO Box 54
Claremont, 6910
Western Australia

Dear Planning & Development,

We are residents of Claremont, and we are writing to express our support for the application of the development for 162 & 164 Alfred Road, Swanbourne – the proposed childcare centre.

We understand that this application is for the benefit of the local community and whole hearted support its approval.

We, as rate payers, and owners of both 136a & 136b Alfred Road, Swanbourne ask the council to also fully support this development.











Yours Sincerely,

Tamsin & Edward Johnson



13.1.3 162-164 ALFRED ROAD SWANBOURNE - RECONSIDERATION CHILD CARE CENTRE**File Number:** 01PEA/19/0180, D-19-42348

Attachments:

1. Location and Submission Map [↓](#) 
2. Photograph [↓](#) 
3. Applicant Letter [↓](#) 
4. Transcore Transport Report [↓](#) 
5. Acoustic Report Environmental [↓](#) 
6. Acoustic Report Traffic Noise [↓](#) 
7. Noise Management and Child Supervision Policy [↓](#) 
8. JDAP Determination [↓](#) 
9. Submissions Table [↓](#) 
10. Plans - Confidential
11. Submissions - Confidential
12. Required Road Modifications [↓](#) 

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Authoriser: Liz Ledger, Chief Executive Officer

Proposed Meeting Date: 17 December 2019

Date Prepared: 4 December 2019

DA No.: DA2019.00047

60/90 Days Due Date: 14 July 2019

Property Owner: Sharon Property Pty Ltd and Kenby Property Pty Ltd

Applicant: Rowe Group

Lot No.: 18 and 19

Area of Lot: 979 plus 870 - 1,849m²

Zoning: Residential with an R20 coding

Enabling Legislation:

Planning and Development Act 2005 (PD Act)
Planning and Development (Local Planning Schemes) Regulations 2015 (LPS Regs)
Planning and Development Act (Development Assessment Panels) Regulations 2011 (DAP Regs)
State Administrative Tribunal Act 2004 (SAT Act)
Local Planning Scheme No. 3 (LPS3)
Local Planning Policy 206 – Child Care Centres (LPP 206)
Western Australian Planning Commission (WAPC) Planning Bulletin 72/2009 – Child Care Centres (PB 72/2009)
Child Care Services (Child Care) Regulations 2006 (Child Care Regs)

SUMMARY

- Application for Development Approval received on 15 April 2019 for Child Care Centre for 90 children at 162-164 Alfred Road, Swanbourne.

- The applicant elected for the application to be determined by the Development Assessment Panel (DAP) as the estimated cost of development exceeded \$2M (\$2.1M).
- Proposal did not comply with Local Planning Scheme No. 3 (LPS3) requirements for Non-Residential Development Abutting a Residential Zone and Local Planning Policy 206 – Child Care Centres (LPP 206) in relation to various matters including land use, location, setbacks, traffic, design and parking.
- 47 Neighbours were originally consulted and 107 submissions were received, five in support and 102 objecting to the proposal.
- Submissions raised a number of concerns including:
 - Substantial increase in traffic and related safety concerns for vehicles and pedestrians
 - Inappropriate location for a commercial land use
 - Commercial land use creep into the Residential zone
 - Impact on residential amenity and noise
 - Future uses of the proposed building if the proposed land use fails, and
 - Impact on property values.
- The plans were amended to address some of the neighbour's and administration's concerns, however the intrinsic locational concerns were unable to be addressed. The site specific issues were not addressed given the proposal is a large commercial operation located on the corner of a road containing a high volume of traffic and a short cul-de-sac in a residential area well removed from a commercial centre.
- It was considered the proposal was not consistent with the provisions of LPS3 and LPP 206, and proposed in an inappropriate location.
- The JDAP refused the application at its meeting held 12 July 2019. A State Administrative Tribunal (SAT) application for review was subsequently lodged, which proceeded directly to mediation with the JDAP.
- Following mediation, a SAT order for a Section 31 reconsideration was issued. Amended plans were lodged with the Town for a reduction to 65 children. The modifications to the plans included a two storey building, landscaping and play areas, and access and car parking layout. A revised Traffic Impact Statement (TIS), acoustic report and child management report have also been submitted.
- The amended application was advertised by mail to 41 nearby landowners and occupants, and by email to the 107 who made submissions on the original proposal. It is noted that the SAT and JDAP timeframe only allowed for a one week consultation period. 102 submissions were received, 32 in support and 70 objecting.
- Concerns raised in the submissions were the same as with the original consultation, with a significant focus on traffic impact, and safety given a number of recent accidents in the immediate vicinity, and also the associated reduced amenity relating to the traffic.
- It is considered that the proposed Child Care Centre is not an appropriate land use at this location and will have a detrimental impact on the amenity of the locality.
- It is recommended that the Officer's report recommending the Joint Development Assessment Panel refuse the development be endorsed by Council.

PURPOSE

For Council to:

- (i) Firstly, be informed the State Administrative Tribunal (SAT) has made an order for a Section 31 reconsideration under the *State Administrative Tribunal Act 2004* (SAT Act).

- (ii) Secondly, consider the officer recommendation regarding the development of a new Child Care Centre at 162-164 Alfred Road, Claremont.
- (iii) Thirdly, be informed that the applicant has requested the application be referred to the Joint Development Assessment Panel (JDAP) for its determination in accordance with the *Planning and Development (Development Assessment Panel) Regulations 2011* (DAP Regs).

BACKGROUND

The proposed Child Care Centre straddles Lots 18 and 19 Alfred Road, Swanbourne. The lots are 979m² and 870m² respectively (totalling 1,849m²) and are situated on the corner of Alfred Road and the Butler Avenue cul-de-sac.

On assessing the original proposed Child Care Centre it was noted that the Town was intending to use Planning Bulletin 72/2009 Child Care Centres to assess and make comment to the JDAP on this application, however on review of the Bulletin, it was noted that it made recommendations for local government to adopt a Local Planning Policy to guide the location and requirements for Child Care Centres. With this in mind, the Town prepared Draft Local Planning Policy 206 – Child Care Centres (LPP 206) based on the Planning Bulletin requirements. Draft LPP 206 was referred to Council on 7 May and was advertised for public comment until 3 June in accordance with the deemed provisions contained in Schedule 2, Part 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015* (LPS Regs). Following consultation, the Policy was adopted by Council 18 June 2019 (see Past Resolutions below) and the required Notice to formalise the Policy was published in the Post Newspaper on 29 June 2019.

It was considered the proposal was not consistent with the provisions of LPS3 and LPP 206, and proposed in an inappropriate location.

Following the Responsible Officer's Report (RAR) recommending refusal of the application (endorsed by Council on 2 July 2019), the JDAP refused the application at its meeting held 12 July 2019. A SAT application for review was subsequently lodged, which proceeded directly to mediation with the JDAP.

Following mediation, a SAT order for a Section 31 reconsideration was issued. Amended plans were lodged with the Town for a reduction from 90 children to 65 children. The modifications to the plans included a two storey building, modified landscaping and play areas, and changes to the access and car parking layout.

The following table outlines key dates regarding this proposal:

Date	Item/Outcome
15 April 2019	Development Application received by Council.
17 April 2019	Application undergoes internal DCU assessment.
6 May 2019	Advertising commenced.
15 May 2019	Additional information requested from applicant.
21 May 2019	Advertising closed.
30 May 2019	Additional information received from applicant.
24 July 2019	Report prepared for Council.
2 July 2019	Application considered by Council.
12 July 2019	Application considered by JDAP
15 July 2019	JDAP determination issued.
7 August 2019	SAT application lodged.
16 October and 6 November 2019	SAT mediation.
6 November 2019	SAT order for Section 31 reconsideration made.
21 November 2019	Amended plans received by Council.
22 November 2019	Advertising commenced.
29 November 2019	Advertising closed.
10 December 2019	Report prepared for Council.

PAST RESOLUTIONS

At its meeting held 18 June 2019, Council resolved to adopt LPP206 – Child Care Centres, with minor modifications in response to the submissions received during the advertising of the Draft Policy (Resolution No. 68/19).

In respect of the application for the Child Care Centre, at its meeting held on 2 July 2019 Council resolved to:

1. *Support the Officer recommendation to the Metro West Joint Development Assessment Panel that Development Approval be refused for the development of a Child Care Centre at Lots 18-19 (162-164) Alfred Road, Swanbourne for the reasons detailed in the Council report.*
2. *Authorise the Director Planning and Development to forward a report on the application to the Metro West Joint Development Assessment Panel.*

Statutory Considerations

Development Assessment Panel

The applicant elected to have the application determined by a DAP in accordance with Regulation 7 of the DAP Regs. The Regs permit applicants to elect a DAP assessment for developments valued between \$2 million and \$10 million.

Where an application is to be determined by a DAP, the local government cannot issue Development Approval. The Town is therefore required to forward the application to the JDAP for their formal determination on behalf of Council together with an RAR. This also applies to the Section 31 Reconsideration.

In preparing an RAR for the JDAP, the Town is required to undertake a full assessment of the proposal, including advertising and consultation, as per LPS3 requirements.

State Administrative Tribunal

As indicated above, further to the refusal issued by the JDAP the applicant lodged an application for review with the SAT. Following the SAT mediation process between the JDAP and the applicant, the SAT has made an order for a Section 31 reconsideration under the SAT Act. The Town is required to reconsider the application and prepare a RAR for the consideration of the JDAP.

Heritage

The property is not included on the Town's Heritage List.

COMMUNICATION/CONSULTATION

The application was advertised in accordance with Council Policy LG525, however the SAT and JDAP timeframe only allowed for a one week consultation period. The amended application was advertised by mail to 41 nearby landowners and occupants, and by email to the 107 who made submissions on the original proposal. 102 submissions were received, 32 in support and 70 objecting.

A summary table of the submissions are provided as Attachment 9, and full copies are included as confidential Attachment 11. An independent Traffic Impact Statement has also been submitted by concerned residents, and is included with the full copies of the submissions.

Submissions raised a number of concerns including increase in traffic and safety concerns for vehicles and pedestrians, parking, inappropriate location for a commercial land use, creep of commercial land uses into the residential zone, impact on residential amenity and noise, impact on property values, demand for child care services, size of the building and future uses of the proposed building if the proposed land use fails, discussed in detail below.

Submissions in support of the proposal noted a perceived shortfall of child care facilities in the immediate vicinity.

DISCUSSION

Description

The amended application proposes a Child Care Centre over two lots, 162-164 Alfred Road, Swanbourne. It is proposed to accommodate 65 children (in lieu of the previous 90) and 12 staff (in lieu of 13), and operate Monday to Friday from 7am to 6pm.

The proposed building is double storey (total floor area of 635m²), with pitched roof and verandah / balcony surrounding. The building proposes separate activity areas for different age groups:

Activity 01 - 1-2 years	8 children (55.44m ²)
Activity 02 - 0-1 years	8 children (47.29m ²)
Activity 03 - 2-3 years	10 children (63.11m ²)
Activity 04 - 3-5 years	19 children (61.98m ²)
Activity 05 - 3-5 years	20 children (101.21m ²)

The building also proposes a sleep area and bathrooms for the children, reception, administration office, storage, laundry and staff amenities. 19 car parking bays are proposed with dual access from Butler Avenue and a left in only access from Alfred Road discussed below. Outdoor play areas are proposed adjacent to the eastern boundary, and to the southern and eastern sides of the building. The second storey also includes an outdoor play area balcony to the east and north. A landscaped buffer is proposed to the adjoining property boundaries. Vegetation is to be retained on site where possible, and verge trees are also to be retained.

The major changes from the original proposal are:

- Reduction from 90 children to 65 children, and from 13 staff to 12 staff
- Two storey building (total floor area of 635m²) in lieu of single storey (total floor area 624m²)
- Traditional pitched roof profile in lieu of skillion
- Masonry boundary fencing to neighbouring residential properties in lieu of colorbond
- Increased side setbacks to the eastern and southern residential properties
- Landscaped buffers to boundaries, including a 6m wide landscaped buffer to the southern residential property
- Reconfiguration of car parking and accessways to be 5m from adjoining residential properties, additional left in access from Alfred Road and reduction in parking bays from 20 to 19
- Additional shade trees within the car parking area.

Compliance

The modified development proposes the following variations to the provisions of LPS3 and LPP 206 – Child Care Centres. Where development does not comply with the provisions of LPS3, a variation can only be considered if provided for under the terms of the Scheme. Council must have regard to the Policy requirements, however this does not mean that Council cannot vary the Policy requirements where such a variation is considered appropriate.

Local Planning Scheme No. 3

Land Use

The proposed Child Care Centre is an 'SA' use within LPS3 Table 1 – Land Use Table, meaning that the land shall not be used for the purpose indicated but that in exceptional cases the Council may specially approve of such use where the application has been publicly advertised and the Council has considered all submissions and is satisfied that the use will not have any adverse or detrimental effect on the residents or amenity in the locality.

In considering the application the Council needs to take into account the impact on adjoining land owners and occupiers. Reducing the number of children from 90 to 65 has not decreased the size of the building, which has increased by 11m² despite the reduction in children. An additional 228 car movements have been forecast, which is 242% above the existing average 161 residential car movements on the Butler Avenue cul-de-sac. Taking into account the left in access from Alfred Road the increase in traffic on Butler Avenue could be in the order of 220%. The introduction of a commercial land use into a predominantly residential area is likely to detrimentally impact on amenity of the area through noise disturbance from parking and increased traffic, which may in turn result in safety issues. The site's location on a busy street (Alfred Road), and also being located on a short

cul-de-sac (Butler Avenue), is of concern. As noted below the Town's Engineering Services have concerns that the trip distribution has not been correctly modelled, and safety issues have not adequately been addressed. The current availability of on street parking in Butler Avenue may also be compromised, noting also the restrictions in parking which also apply along Alfred Road in this location. It is considered the proposal will have a detrimental impact on the amenity of residents in the locality and the land use at this scale is therefore not supported.

Clause 46 – Objectives of the Residential Zone

Clause 46(3) of LPS3 refers to *"the continuation of the domestic scale and architectural character of the area..."* The amended plans have a traditional gable roof and has more of an appearance of a double storey dwelling. The scale of the dwelling however is bulky given that the total floor area has not been reduced. In addition, with the inclusion of a 19 bay car parking located within the setbacks to Alfred Road and Butler Avenue, the residential appearance of the development is diminished.

(Clause 37A – Non-Residential Development Abutting a Residential Zone)

Clause 37A of LPS3 contains specific requirements for setbacks from the adjoining residential properties.

Clause 37A(1)(a) requires:

(a) *The following building setbacks from the Residential zoned land area provided:*

- (i) *Six (6) metres for the ground floor and first floor with all other floors being set back six (6) for each additional storey;*
- (ii) *Notwithstanding (i) above Council may accept the ground floor being constructed up to the boundary of the Residential zoned land providing the wall on the boundary does not at any point exceed a height of two (2) metres above natural ground level (measured at the common boundary) of the adjacent residential land."*

The amended design proposes a compliant 10m setback to the southern boundary and a 6m setback to the eastern boundary.

Local Planning Policy 206 – Child Care Centres

Guidelines on Child Care Centres have been prepared by the Western Australian Planning Commission (WAPC) in Planning Bulletin 72/2009 Child Care Centres (BP 72) to assist Local Government in preparing a LPP to address common issues relating to this matter. Based on BP 72, and modified to address local amenity concerns, LPP 206 – Child Care Centres adopted by Council on 18 June 2019 to provide guidance on the appropriate location of Child Care Centres, setting out provisions to minimise the impact of Centres on the surrounding locality and the impact of the area of the Centre, and consider the health and safety of children attending the centre.

The proposed Child Care Centre is inconsistent with the following provisions of LPP 206:

Location Requirements

LPP 206 outlines preferred locations for centres:

- *Close to or part of commercial, recreation or community nodes and education facilities, with preferred locations on lots zoned "Local Centre", "Town Centre", "Highway", or "Educational", or on "Residential" lots immediately adjacent to these zones.*

The proposed Centre is on a lot zoned "Residential" in a locality which is not adjacent to commercial or community nodes.

- *Areas where adjoining land uses are compatible, serviced by public transport and considered suitable from a traffic engineering / safety view.*

The site immediately abuts residential properties. Traffic and safety has also been raised as a significant concern given the increase which will result in Butler Avenue, discussed below. Butler Avenue currently has an average of 161 residential vehicle movements per day. There is a forecast of 228 vehicle trips to be generated, with 194 on Butler Avenue, which is a 220% increase above the current volumes on Butler Avenue. If the development is approved, it would be appropriate to include

a condition the application be required to improve the road design by constructing a median splitter island at the Butler Avenue and Alfred Road intersection to improve safety conditions by reducing ability for vehicles to cut the corner and provide a pedestrian refuge. A median island on Alfred Road is also recommended to prevent illegal turns into the Alfred Road crossover and access from the west. Additionally, the independent Traffic Impact Assessment submitted by Cardo recommends a channelised right turn lane at the Butler Avenue intersection and basic auxiliary left turn treatment from the east. These modifications are indicatively shown on Attachment 12. These can also be requested as conditions should the application be approved.

- *Site of sufficient size to accommodate the development without impacting on the amenity of the surrounding area.*

Given the amended plans have not reduced the floor area of the building, the car parking area has been increased to create a disproportionate amount of hardstand, and outdoor play areas are still located adjacent to the eastern boundary, This demonstrates the site is being overdeveloped, and that a Child Care Centre for 65 children and 12 staff is not appropriate for this site.

- *Not to be located where access is from major roads, close proximity to major intersections or where access is from a local access street which may result in traffic, parking or associated amenity concerns.*

Access is proposed left in from Alfred Road (District Distributor) and full movement access is proposed from Butler Avenue which is classified as a Local Access Street. The increase in traffic and street parking on Butler Avenue is likely to result in a negative impact on the amenity of the locality. Being a cul-de-sac the single entry and egress means that the majority of vehicle movements from residents and visitors, and customers and staff of the Centre are concentrated at that intersection, with no available flow through to other streets. With vehicle movements concentrated at the intersection that would otherwise be available on a through road the adverse impact on amenity of the residents is effectively doubled.

- *Not to be located where noise from nearby roads are likely to have an adverse impact on the site.*

In this instance the Centre is located on Alfred Road which has a high volume of traffic braking and accelerating relative to the Myera Street signalised intersection. As noted above, a condition can be recommended to the JDAP should they support the application for acoustic protection to be included in the building construction as per the recommendations in the Acoustic Report.

Site Requirements

LPP 206 states *sites should be of sufficient size, shape and dimension to accommodate the development (inclusive of buildings with required setbacks, parking, outdoor play areas and landscape buffer strips); and be level/non elevated sites to reduce impacts on access and noise transfer/mitigation.*

Whilst on a level site, the variations proposed and bulkiness of the building demonstrates the size of the Centre is too large for the site. Non-compliant outdoor play areas are proposed adjacent to residential development and large parking hard surfaces within the front setback, (discussed below).

Development Requirements

In addition to requirements applicable under LPS3 (in particular cl.36(6) and cl.37(A)), LPP 206 addresses the following:

- *Visual appearance of developments should reflect the character of the area, and enhance its amenity.*

As noted above, it is considered that while the proposed built form is more consistent with the residential character of the area, the large hardstand parking area diminishes the residential amenity.

- *Parking for staff and children is to be at a rate of one space per five children. Where located in areas or with access from streets with limited capacity to accommodate overflow parking, on-site parking should be increased at a rate of 0.5 bays per staff member.*

Given the site gains access from Butler Avenue which has limited capacity to accommodate overflow parking, the increased rate of 0.5 bays per staff member is recommended, resulting in a car parking requirement of 19 bays, which has been provided on the site plan. It is noted that two of the bays are in tandem formation, for these to be supported they will need to be for staff parking only. Should the JDAP support the application a condition is recommended that the internal tandem bay be marked for Staff Only. It is noted that loading and waste collection will not occur during peak times so will have limited impact on the availability of parking bays, which can also be recommended as a condition. A further condition that any parent gatherings be held at different times for the different age groups may also assist in minimising overspill of parking onto local roads.

- *Outdoor play areas to be in a safe location away from high traffic areas and also away from any adjoining noise sensitive premises such as dwellings.*

The outdoor areas located adjacent to the future dwelling to be constructed to the east is not consistent with LPP 206 and is not supported given that noise impacts on the adjoining properties need to be mitigated. Should the JDAP support the application a condition is recommended that the proposal be redesigned to separate play areas from neighbouring residential properties.

- *A traffic impact statement shall be provided with all applications which addresses the site and its location, the expected trip generation, parking requirements and parking area design (including access located in accordance with LPS3 requirements), existing and future traffic conditions, current road safety conditions including crash history in the immediate locality, and the expected impact on existing and future traffic conditions.*

The revised Traffic Impact Statement (TIS) submitted with the application states that traffic operations of the road network will not be adversely affected by the additional traffic. However the actual increase in traffic will be in the order of 220% above the existing volumes on Butler Avenue, which is a significant impact on the amenity of the local street. It is noted that the residents submitted an independent TIS which makes a number of recommendations for modifications to the road network to improve traffic and pedestrian safety which cannot be accommodated due to specific constraints identified at this location, further indicating that the site is not suitable for the development. In respect of the revised TIS concerns are discussed in the response to submissions:

- *No access permitted from a Primary or Regional Distributor Road, a Right of Way or short Access Road such as a cul-de-sac or no through roads.*

Access is now also proposed from Alfred Road (District Distributor) left in only. This is not ideal, however it has been proposed in order to reduce the concentration of the additional traffic on the Butler Avenue. Access is also proposed from Butler Avenue which is classified as a Local Access Street, and given it is a short no-through road, the increase in traffic and potential street parking on Butler Avenue is likely to result in a negative impact on the amenity of the locality.

- *A noise impact assessment shall be provided with all applications which address the prime objectives of limiting the impact of a Child Care Centre on adjacent residential properties and also limit the impact of external noise sources on the Child Care Centre.*

The acoustic assessment submitted with the application identifies the proposal will be compliant with the requirements of the *Environmental Protection (Noise) Regulations 1997* for the proposed hours of operation. The additional acoustic report also demonstrates that noise ingress mitigation can be achieved with standard construction, with additional height of balustrading and glazing to the northern site of Activity Room 4. Should JDAP approve the proposal a condition should be recommended that the building comply with the recommendations of the acoustic report.

- *All servicing and deliveries to the site are to take place during the operational hours and not during peak morning drop-off or peak afternoon pick-up periods of the Child Care Centre.*

The application indicates that rubbish collection will be carried out outside of peak hours. Should JDAP approve the proposal a condition should be recommended that servicing and deliveries, including waste collection, be limited to the above, but restricted to 10.00am to 3.00pm to reduce the impact on the amenity of the neighbours.

- *Where located adjacent to noise sensitive uses, all noise generating activities such as outdoor and indoor play areas, parking areas to be located away from the noise sensitive use. Amenity impacts are to be mitigated by appropriate fencing, non-openable and double glazing (or equivalent) windows together with landscaping.*

As noted above a play area is located adjacent to boundary of the eastern residential property. As above, should the JDAP support the application a condition is recommended that the proposal be redesigned to separate play areas from neighbouring residential properties.

- *The design and construction of the Day Care Centre is to also mitigate against impacts from external noise and vibration sources.*

An assessment of external noise of Alfred Road on the centre has been provided. As above, should JDAP approve the proposal a condition should be recommended that the building comply with the recommendations of the acoustic report.

- *In order to assess the impact to the local community that a proposed Child Care Centre has on the level of service of similar or approved facilities, applications are to include information on the level of existing (or proposed) services in the locality, proximity to other centres, population catchments for the proposed centre and the number of primary schools and kindergartens in the locality, together with the number of students at these facilities.*

No information has been provided, however it is acknowledged the application for Development Approval was lodged prior to the Council adoption of LPP 206. However WAPC Planning Bulletin 72/2009 – Child Care Centres specifically notes that impact on existing facilities should be assessed by the proponent at time of application. Without this information the Town is not able to determine whether there will be an impact on existing Child Care Centres and Family Day Care operators in the vicinity.

- *Approvals should only be issued where it can be demonstrated that the Child Care Centre will have minimal impact on the functionality and amenity of an area and will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians, cyclists or road users.*

It is considered the introduction of a commercial Child Care Centre into the predominantly residential area will likely have a detrimental impact on the amenity of the locality in regards to traffic and parking, and consequent safety issues.

Responses to Submissions

The following applicant and officer comments are made in response to the submissions:

Traffic and Safety

Significant concerns have been raised regarding traffic and safety, and the negative impact on residential amenity this will have. Concerns have been raised that current safety issues will be exacerbated due to the existing high level of traffic using Alfred Road, increase in traffic generated by the Centre, sight issues (line of sight, blind spot and setting sun) on Alfred Road, and proximity to traffic lights and other intersections. Turning in and out of Butler Avenue may become increasingly dangerous and vehicles queueing on Butler Avenue are likely to block the driveways of adjacent houses, disrupting neighbourhood amenity. Residents are concerned the proposal does not comply with the WAPC Planning Bulletin 72/2009 – Child Care Centres (PB 72/2009). In regards to the applicant's TIS, it has been noted by residents that the number of vehicles expected to visit the site and the length of vehicle queues has been substantially underestimated, and the assumption that 70% of peak AM traffic comes from the west is not realistic. The TIS also doesn't sufficiently consider adjacent intersections. Accidents in the locality stated in the TIS are not accurate.

The independent TIS from Cardno commissioned by the surrounding residents found:

- Sight lines at Alfred Road are impeded and the increase in traffic could potentially exacerbate the safety issues at the intersection.
- The additional turning traffic necessitates upgrades to the intersection (channelised right turn, auxiliary right turn and auxiliary left turn)

- Queues from the Rochdale Road intersection are expected to extend beyond Butler Avenue impacting on the operations of Alfred Road, Butler Avenue and Mayfair Street.
- Crossovers to be designed for pedestrian path to have priority.
- Crossover on Alfred Road is undesirable given high traffic volumes, safety concerns and visibility issues. Butler Avenue crossover is located 40m from the Alfred Road intersection which is not in accordance with AS2890.1.

Applicant's response:

"Transcore have prepared a revised Transport Impact Statement ('TIS') which includes modelling beyond the requirements of the Western Australian Planning Commission ('WAPC') Transport Impact Assessment Guidelines ('TIA Guidelines'). The revised TIS includes 'worst-case-scenario' traffic generation/distribution and network modelling with the Alfred Road and Rochdale Road signalised intersection.

The TIS found no safety issues with the Butler Avenue and Alfred Road intersection or Rochdale Road and Alfred Road intersection, or indication that the proposed development will create or contribute to any safety issues. All overhead power lines in the area have been moved underground, resulting in the removal of power poles which had the potential to create a blind spot. The Town will ensure that street trees are maintained to ensure maintenance of sight-lines.

In terms of the impacts on the intersection of Butler Avenue and Alfred Road, Transcore's traffic modelling confirms as follows:

- *Depending on the post development movement, the number of queued vehicles on Butler Avenue turning left onto Alfred Road would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (less than 1 second);*
- *Depending on the post development movement, the number of queued vehicles on Butler Avenue turning right onto Alfred Road would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (i.e. 5 and 2 seconds during AM and PM peak, respectively);*
- *Depending on the post development movement, the number of queued vehicles on Alfred Road turning right into Butler Avenue would remain unchanged (i.e. one (1) vehicle). The average delay for the same movement would increase marginally (less than 1 second).*

Based on the traffic modelling, the impact of the proposal on the existing traffic movements associated with the existing Butler Avenue residential properties is minor with no significant impact to the queuing length of the vehicles or delay time for vehicles waiting to turn onto Butler Avenue from Alfred Road or onto Alfred Road from Butler Avenue. The proposed development will therefore have a negligible impact on the how residents access their property on Butler Avenue.

It is important to note that PB 72/2009 is a guiding document only and is not binding on the decision making of the Council. Further, the provisions outlined in PB 72/2009 are generally recommendations as to how the objectives of the document may be met, as opposed to prescribed requirements.

Noting the above, with regard to the location of child care centres, Clause 3.3 of PB 72/2009 states the following provisions relating to road safety:

The appropriate location of a child care centre is crucial in meeting the needs of children and their families. It also is crucial in limiting the impact a child care centre may have on surrounding activities and vice versa.

This may be achieved by located child care centres on sites that are:...

- d) *served by public transport (where available);*
- e) *considered suitable from a traffic engineering/safety point of view; and...*

Child care centres generally would not be suitable where:...

- j) *access is from a major road or in close proximity to a major intersection where there may be safety concerns;*
- k) *access is from a local access street which may impact on the amenity of the area due to traffic and parking;...*

It is considered that the proposal complies with the above provisions relating to road safety for the following reasons:

- *The subject site is serviced by public transport, with a high frequency bus route located directly adjacent on Alfred Road;*
- *The proposal is considered suitable from a traffic engineering/safety point of view, as outlined in the TIS;*
- *Access is not located in close proximity to a major intersection, and the TIS has identified no safety concerns relating to the proposal; and*
- *Access is from a local access street, however this will not impact on the amenity of the area for the following reasons:*
 - *The largest traffic increases during the peak hour of operation will be in order of 34vph on Alfred Road, hence the anticipated impact on the surrounding road network will not be significant and would be well within the capacity and function of the relevant roads;*
 - *Depending on the post development movement, the number of queued vehicles on Alfred Road and Butler Avenue would remain unchanged, and the average delay for the same movement would increase marginally;*
 - *The expected level of service of the Alfred Road / Rochdale Road intersection would not be materially impacted by the proposal;*
 - *The expected level of service of the Alfred Road / Butler Road intersection will only be marginally impacted by the proposal; and*
- *The proposal is fully compliant with LPP 206 with respect to parking.*

PB 72/2009 also states the following with regard to traffic impacts:

A traffic impact statement/assessment should be required for the development of a child care centre.

This statement/assessment should address:

- a) *the site characteristics and surrounding area;*
- b) *the proposal and its expected trip generation;*
- c) *parking requirements, including the design of parking area, and any pick-up and drop-off facilities;*
- d) *existing traffic conditions and any future changes expected to the traffic conditions;*
- e) *current road safety conditions, including a crash history in the locality; and*
- f) *the expected impact of the proposed development on the existing and future traffic conditions.*

A child care centre should be approved only if it can be demonstrated that it will not create or exacerbate any unsafe conditions for children and families using the centre, or for pedestrians or road users.

As discussed previously, a TIS has been provided with the Application which addresses each of the above considerations. The TIS finds that the proposal will not create or exacerbate any road safety issues.

As noted previously, the TIS found no evidence that the proposal will result in unreasonable increase in traffic. The impact of the proposal was found to be negligible.

In respect to the proximity to the traffic lights at the Rochdale Road and Alfred Road intersection, no issues have been identified by Transcore in the preparation of the TIS.

The car parking area is designed to accommodate full vehicle manoeuvrability, and access and egress in forward gear, including right turns onto Butler Avenue. Visitors will not be required to turn around at the cul-de-sac 'head' of Butler Avenue. The TIS found no indication that the proposed development will create or contribute to any safety issues. The majority of trips would not be impacted by the setting sun.

The traffic modelling conducted by Transcore includes 'worst-case-scenario' traffic generation and distribution. This includes both a 70/30 and 30/70 east/west distribution. As a result, the TIS found no safety issues with the surrounding streets, or indication that the proposed development will create or contribute to any safety issues.

Any crashes which are considered substantial, including those involving pedestrians and cyclists, are reported and included in the Main Roads WA crash rate data. The TIS prepared by Transcore in accordance with the WAPC TIA Guidelines and submitted with the Application was prepared based on this data. The TIS identifies 6 crashes at the Alfred Road and Butler Avenue intersection, of which none involved pedestrians or cyclists. None of the crash factors are denoted as higher than expected.

In regards to the Cardno report, any existing substantial vegetation within the road verge that may affect the intersection sightlines should be regularly maintained and pruned. This is the responsibility of local government and such issues are not be responsibility of the developer.

Furthermore, any potential geometry, operational or safety issue identified for an existing road or intersection is the responsibility of the asset owner, which in this case is the local authority. As such, it is the responsibility of the particular local authority, and not the developer, to address any of these potential existing issues.

The intersection SIDRA capacity assessment does not identify any such requirement for channelising and auxiliary lane treatments. The level of turning traffic from Alfred Road into Butler Avenue does not meet the relevant turn pocket warrants.

The eastbound traffic flows on Alfred Road are pronounced during the typical weekday morning peak commute period and accordingly some slowdown and queueing at traffic signals may be occasionally experienced on the western approach to the traffic signals. However, this situation is a common occurrence at traffic signals within an urban environment during peak weekday periods. Importantly, any queues on the western approach to the signals are generally cleared after the light turns green and within one signal phase. As such any delays associated with the right-turn out movements from Alfred Road would only be temporary and occasional.

Furthermore, Butler Avenue outbound movements as well as right-turns from Alfred Road into Butler Avenue are greatly assisted by the proximity of traffic signals and resultant creation of gaps in westbound traffic flows along Alfred Road."

Officer Comment

The main concerns raised in the submissions relate to the proposed increase in traffic on Butler Avenue and Alfred Road, and associated safety concerns, which would result from the proposed Child Care Centre, with approximately 228 daily trips forecast to and from this site. This is an increase to 220% of the current traffic volumes using Butler Avenue.

An increase to 220% of the existing traffic volumes will require upgrades to the adjacent road layout, requiring traffic islands be constructed. It is also worth noting that whilst some of the traffic generated will be spread over the day, the peak hour drop off and pick up times coincide with the existing peak hour traffic on Butler Avenue, increasing congestion and queueing at the intersection.

The TIS submitted by the applicant has been prepared in accordance with WAPC Transport Impact Assessment Guidelines Volume 4, which allows for a TIS to be prepared on the basis that the traffic increase is deemed to have only a Moderate Impact if within the road's capacity level of 3,000 vehicles per day. However this is an assumption based on the hierarchy classification of the road being a local access road. It does not consider the context of this street which is a cul-de-sac abutting native bushlands with current traffic volumes of 161 vehicles on an average day. The categorisation of the road based on its hierarchy is therefore not agreed as a good basis for the requirements of a

more details analysis. It is not commensurate with a quiet, slow speed cul-de-sac, and does not reflect the current usage and amenity enjoyed by the residents of the street.

The Town's Engineering Services have undertaken a review of the TIS submitted by the applicant. It is considered that:

- The TIS provided with the development application is flawed as its conclusions and modelling is predicated on an arbitrary vehicle trip distribution which does not consider trip continuation to local activity centres such as schools or commercial areas. It also fails to consider the existing operation of the local road network, or the limited number of routes available to the site originating within the locality due to geographic constraints such as the Lake Claremont bushlands.
- The SIDRA analysis provided by the applicant shows a noteworthy decrease in the level of service of the Alfred Road and Butler Avenue reclassifying levels of service from a category C to a category D. This is without a more critical analysis being undertaken considering any trip continuation, which would likely increase delays even further.
- The applicant has suggested that the increase in traffic is minor when the number of vehicles are considered in relation to the hierarchy of the intersecting roads. This however fails to reflect the existing amenity of the road for the residents. The projected actual increase in volumes is a 220% increase from the current usage of Butler Avenue. This is considered significant in the context of the existing usage of the road and intersection.
- Butler Avenue is a cul-de-sac. The TIS has assumed that visitors to the proposed Child Care Centre will not utilise the on road parking or use the entire length of Butler Avenue to drive down and turn around to return to the intersection to depart. It is considered likely that some vehicles will traverse the length of the cul-de-sac, and also potentially drive into nearby residential crossovers, and thus impact on residential amenity in one form or another. The forecast peak hours will coincide with the existing am peak hour usage by the residents and it is considered likely this additional traffic will delay them from exiting from their driveways, further impacting the amenity of the street that residents currently enjoy.
- Analysis of the operation of the adjacent intersections has been undertaken and some of the results are questionable. The input parameters have not been provided with the report, however it appears to demonstrate that the level of service at the Alfred Road and Rochdale Road intersection improves due to the increased volume of traffic generated by this development, which is counter intuitive. It would seem more likely that delays will increase.
- The traffic analysis of the local intersections fails to consider Mayfair Street in the SIDRA analysis despite being within 10m of Butler Avenue on the north side of Alfred Road making it effectively a staggered four way intersection. It is considered likely that the inclusion of this intersection as part of the network analysis would result in a further increase in delays at the Butler Avenue intersection and increase safety concerns due to driver behaviour. Longer delays may increase the occurrence of drivers taking dangerous risks, also parking in Mayfair Street and subsequent pedestrians (including small children) crossing Alfred Road to the Centre, adding again to the existing safety concerns.
- The Town informed the applicant of two recent crashes which have occurred within 40m of the development site where children were crossing while walking home from a local school. Both accidents were caused by vehicles turning from a side road into Alfred Road and hitting crossing pedestrians. It was reported that in one of these cases a child was hospitalised with spinal injuries. Despite being provided with this information the applicant has made no mention of the incidents within subsequent traffic and road safety analysis, nor mentioned it as a matter for consideration as a site specific issue. This lack of consideration demonstrates that the reports provided are inadequate and the applicant is not satisfactorily addressing the safety concerns of the Town and local community.
- In order to improve safety aspects of the design crossovers need to be designed for pedestrian path to have priority as per the independent TIS. Should the development be approved this can be included as a condition.

- Due to the impact of the development on the current traffic operation, road modifications (Attachment 12) are recommended to improve the road design and better accommodate the development. A splitter median island is recommended at the Butler Avenue and Alfred Road intersection in order to provide a safe pedestrian refuge as per the applicant's TIS. A median island on Alfred Road opposite the proposed left in crossover will act to prevent incidents of the left in crossover being misused. These modifications necessitate minor consequential changes to the intersection geometry of Butler Avenue and Alfred Road and associated pedestrian path links to improve the operation of the splitter island, and a recommended relocation of the Alfred Road crossover 5m to the west of the proposed crossover location to place improved constraints on potential entry from the west along Alfred Road without impacting on the residential crossover movements opposite. These upgrades would be subject to detailed design to be determined by the Town of Claremont at the cost of the applicant and can be included as conditions should the application be approved. Other intersection upgrades suggested by the independent TIS for channelised right turn and auxiliary left turn (deceleration left turn pocket) on Alfred Road cannot be accommodated within the existing road constraints (proximity of the intersection with Mayfair Street and restricted sight lines from Butler Avenue).

Parking

Concerns were raised that there will be a negative impact on the current residential amenity due to overflow parking on the road which will limit parking available for visitors to surrounding residential dwellings.

Applicant response

"The proposal is compliant with the Town of Claremont ('Town') Local Planning Policy 206 – Child Care Centres ('LPP 206') with regard to parking. LPP 206 requires the provision of car parking in excess of the recommendation in PB 72/2009, and includes an additional provision for parking if the subject site is located on a street unable to facilitate verge parking. Given its compliance with LPP 206, the proposed development will not need to rely upon verge or street parking.

The proposal also aims to encourage parents and children to utilise active forms of transport including walking and cycling, through the provision of bicycle racks, proximity to the adjacent high-quality shared pedestrian and cycle path on Alfred Road, and location within a residential area.

The proposal is well-connected to public transport, with a high frequency bus route located adjacent to the subject site on Alfred Road, which can be utilised by staff in particular. The nearest bus stops are serviced on weekdays between 6:25am to 6:59pm towards Perth, and between 7:05am and 7:04pm from Perth."

Officer comment

It is considered unlikely that public transport, cycling and walking will be utilised by customers of the centre due to the nature of the land use. It is considered very likely that any overflow parking will occur on Butler Avenue, and may even be the preferred 'easier' option for some customers. Whilst it is acknowledged there is compliant parking on site, this does not take into account human behaviour, which may result in parking on the street which will affect the amenity of residents in Butler Avenue.

Inappropriate Land Use and Impact on Residential Amenity

Concerns were raised that the proposal is a commercial development in a residential area and will have a negative impact on the amenity of the locality.

Applicant response

"The proposal is capable of approval within the 'Residential' zone and is consistent with the objectives of the 'Residential' zone. The location of the proposal is intended to accommodate local families by reducing travel times and number of car trips, and encouraging active transport options including walking and cycling. The anticipated impact on the surrounding road network is expected to be negligible.

The proposal has been designed to be consistent with the surrounding built form and character of the area. The proposal incorporates extensive landscaping, and building materials and finishes which draw inspiration from both nature and the surrounding residential character.

The proposal has been designed to comply with the Environmental Protection (Noise) Regulations 1997 ('Noise Regulations')."

Officer comment

As discussed below, it is considered the proposed land use is inappropriate within the 'Residential' zone. LPP 206 recommends preferred locations for Centres near commercial, recreation or community nodes and education facilities, with preferred locations on lots zoned 'Local Centre', 'Town Centre', 'Highway', or 'Educational', or on 'Residential' lots immediately adjacent to these zones. The proposed Centre is on a lot zoned 'Residential' in a locality which is not adjacent to commercial or community nodes. It is considered the increase in traffic, and on street parking which will result from the proposed Centre is likely to have a detrimental impact on the amenity of the residential locality and it therefore not suitable to be located within the 'Residential' zone as required by the Scheme.

There are a number of land uses that can be considered within a 'Residential' zone, however it is the intent that these uses be fully compatible with residential land uses, and incorporate into the 'Residential' zone as additional land uses rather than a large stand-alone land use, for example Home Offices and Home Occupations, Aged Care, or Family Day Care where five or six children are cared for. Although reduced in size from the initial proposal, the proposed Centre is a significantly large commercial operation, with 65 children and 12 staff, and still incompatible with the adjoining residential land uses.

As noted above it is considered the large Child Care Centre land use is not appropriate within the 'Residential' zone, as it is likely to have an adverse impact on the residential amenity of the locality. It is the expectation of existing residents that the "Residential" zone will be maintained for residential purposes. It is considered the considerable increase in traffic on the short Butler Avenue cul-de-sac will have a significant impact on the amenity of the quiet cul-de-sac. At the R20 density it would normally be the expectation that the combined lots could be redeveloped with four dwellings, resulting in an increase of daily vehicle movements in the order of around 30 trips from three additional dwellings, and limited impact on residential amenity and traffic movement.

Noise

Concerns were raised the noise impact from the centre will detrimentally affect the amenity of surrounding neighbours. The Noise Management and Child Supervision Policy is unrealistic and difficult to implement.

Applicant response

"As noted previously, the proposed built form has been designed to comply with the Noise Regulations. The proposal also includes additional provisions in order to further reduce the impact of noise on residential amenity. These measures include a wide landscaping buffer to the southern boundary, brick boundary walls, glass screening to the balconies, and a detailed Noise Management and Child Supervision Policy ('NMCSP')."

The NMCSP is based on a standard policy which has been implemented in many child care centres throughout Perth. Its provisions relating to the supervision and management of children, such as limiting the number of children playing outside, and the locations in which they play, are standard and common measures for child care centres.

Further, the proposal is compliant with the Noise Regulations without the implementation of the NMCSP. The proposed built form has been designed to comply with the Noise Regulations in itself. The proposal includes a number of additional provisions, including the NMCSP, which go above and beyond the Noise Regulations in order to significantly reduce the impact of noise on residential amenity."

Officer comment

Whilst it is noted the Acoustic Assessment for the proposed Child Care Centre demonstrates the noise levels will comply with *Environmental Protection (Noise) Regulations 1997*, the application has not taken into account the amenity of adjoining residences, with an outdoor play immediately adjacent common boundaries.

Visual Impact and Size of Building

Concerns were raised that the scale of the proposal is large, and the building too high in relation to existing properties. The size of the building has increased, which could provide for the developer to apply for an increase the number of children which can be facilitated by this proposal.

Applicant response

"The footprint of the proposed development is approximately 328m². This is similar to other houses located on Butler Avenue and the wider surrounding residential area. Therefore, the proposed footprint of this development is consistent with the footprint of existing development in the area.

Furthermore, the footprint of the proposed development is considered to be lesser as the development is across two (2) lots, with a combined site area of approximately 1,860.6m². This means the site coverage is only approximately 17.6% which is considerably lower than all other development in the area.

The height and scale of the development is similar to that of a two-storey single house within a residential area and is reflective of the height and scale of other residential development in the area. In addition, the building height and setbacks are compliant with the provisions of the Town's Local Planning Scheme No. 3. Therefore, the physical size of the development is not significant.

A landscaping strip is provided between the car parking area and street boundaries in order to partially screen the cars from view from the public realm, and improve the visual amenity. Mature trees are also proposed between every three bays, in accordance with the Town's Local Planning Scheme No. 3 requirements.

The proposed development has the appearance of a single house when viewed from Butler Avenue and Alfred Road both in terms of both scale and character. The scale of the development is similar to that of a single house within a residential area and is reflective of the scale of other residential development in the locality.

The proposed development has been designed purposely to reflect the character of the surrounding residential properties. Meyer Shircore Architects has undertaken a character study of the locality to determine key architectural features, construction materials and colours. The findings of this study has influenced the design and form of this development. Similar design elements (such as a traditional pitched roof, a balcony, vertical windows) and construction materials (such as colorbond, weatherboard, feature stone walls, masonry) from the surrounding area have been incorporated into the proposed development to ensure this consistency. Therefore, the proposed built form is a proper representation of the surrounding residential character.

This Application seeks approval for up to 65 children and 12 staff. There are no prescriptions on the maximum size of child care centre developments in the Town of Claremont or under PB 72/2009. This Application is required to determined based on what is proposed. Should this proposal be approved any changes will require further application. "

Officer comment

It is acknowledged the building has a low site cover and the building has traditional residential elements incorporated into the design. However the building is still considerably larger than required, having increased in floor area from the original proposal, now being 635m² in lieu of the original 624m² proposed as single storey, creating additional unnecessary building bulk. The internal play areas are 50% (117m²) larger than required for the proposed 65 children and could theoretically accommodate 36 additional children (total 101 children) under the provisions of the *Child Care Services (Child Care) Regulations 2006* (Child Care Regs). This raises concerns that should this application be approved, a future application could be submitted to increase the number of children at the Centre in the future. While it is acknowledged that any future application will be dealt with on its merits, the provision of a larger Centre in the first instance only encourages this as a potential

outcome. It is considered appropriate that the Centre should be purpose built and therefore reduced in size commensurate with the Child Care Regs requirements for 65 children. Should this application be approved it is recommended that a condition be included to reduce the size of the building accordingly. The site also includes a significantly large hard stand area for parking and accessways for the entire dual street frontage of the property. This is not considered in keeping with the residential streetscape and will impact negatively on the current residential amenity.

Precedent and Future Use of Building

Concerns are raised that a commercial development in a residential area will set a negative precedent for future commercial development, or other after-hours uses of the proposed premises.

Applicant response

"A child care centre is capable of approval within the 'Residential' zone under the Town's LPS3. In addition, the Town is required to consider each Application on its merits and just because the Town may have supported one type of non-residential development within the 'Residential' zone does not ensure support for another."

Officer comment

Concerns were raised that if the proposed Child Care Centre land use fails, future non-residential commercial land uses on the site would create additional adverse impacts on the amenity of the residential area. As a result of the design, it is considered the building would be highly unlikely to be retrofitted as a residence. However any future land uses on the site would need to comply with LPS3, Local Laws and any relevant Local Planning Policy requirements. There are several non-residential land uses which can be considered by the Town in the 'Residential' zone under LPS3. If the proposed Child Care Centre were to proceed and subsequently fail, impacts on the surrounding residential land uses would need be carefully considered should any future applications for a change of use be proposed.

Demand for Child Care Services

Concerns are raised that the demand for child care services in the area is not established.

Applicant response

"PB 72/2009 notes that legal decisions have confirmed that the demand for a commercial facility is not a relevant planning consideration, unless there is a demonstrable impact on the amenity of an area. It is considered that the proposal is consistent with the amenity of the surrounding residential area, for the following reasons."

The proposal is a use that LPS3 allows to be approved in the Residential zone. The proposal will have a negligible impact on the surrounding roads and will comply with the Noise Regulations. The proposal will provide an additional facility to those families with young children. Given the above it is not expected that the proposal will be inconsistent with the zoning or surrounding uses."

Officer comment

No information has been provided to demonstrate a need for Child Care Centres in the area, however submissions of support do provide anecdotal (but unsubstantiated) comments that there is a demand for services in the area. LPP 206 requires applications to include information on the level of existing or proposed services in the locality, proximity to other Centres, population catchments and number of Primary School and Kindergartens in the locality and their number of students. PB 72/2009 specifies that in instances where development may have an adverse impact on amenity, further information in regard to level of existing services (as per LPP 206) can be requested for assessment. In this instance, the further information to demonstrate the need for the facility has not been provided.

Officer Recommendation to JDAP

As this application is to be determined by the JDAP, Council is required to submit its recommendation and accompanying RAR to the JDAP. The officer's recommendation to the JDAP is as follows:

Recommend that the Metro West JDAP refuse the proposed Child Care Centre at Lots 18-19 (162-164) Alfred Road, Swanbourne, for the following reasons:

1. The proposed Child Care Centre is inconsistent with Town of Claremont Local Planning Scheme No. 3 with respect to:
 - a. Day Care Centre is an 'SA' use within Table 1 – Land Use Table. It is considered the proposal will have a significant detrimental impact on the existing quiet residential amenity of residents in the locality by way of increased traffic volumes and safety, on street parking and visual amenity. Accordingly the land use is not considered to be an appropriate land use within the 'Residential' zone.
 - b. Clause 46(3) which requires *"the continuation of the domestic scale and architectural character of the area..."* It is considered the bulk of the building and the excessive area of hardstand for parking is not fully in keeping with the residential character of the area
2. The proposed Child Care Centre is inconsistent with Town of Claremont Local Planning Policy 206 – Child Care Centres with respect to:
 - a) Location requirements as:
 - i. The proposal is not contained within a preferred zone, nor immediately adjacent to a preferred zone.
 - ii. The proposal does not adjoin a compatible land use and the traffic increase has not been demonstrated to be suitable from an engineering view.
 - iii. The site is not of sufficient size to accommodate the development without impacting on the amenity of the surrounding area.
 - iv. Access to the site includes access from a local access street which is likely to result in traffic, parking and associated amenity concerns.
 - v. The proposal is located on a high traffic volume road where noise is likely to have an adverse impact on the site.
 - b) Site requirements, as the site is not of sufficient size to accommodate the development with required outdoor play areas suitably located.
 - c) Development requirements as:
 - i. The visual appearance of the parking associated with the development does not reflect the residential character of the area with excessive hardstand area.
 - ii. Outdoor play areas are located adjacent to the residential boundary to the east and considered to be disruptive to residential amenity.
 - iii. The Traffic Impact Statement does not take into consideration the locational circumstances of the site. The increase in traffic will have a detrimental impact on levels of service for the Alfred Road and Butler Avenue intersection, and may result in increased safety risks. It is noted that the residents submitted an independent Traffic Impact Statement which makes a number of recommendations for modifications to the road network to improve traffic and pedestrian safety which cannot be accommodated due to specific constraints identified at this location, further indicating that the site is not suitable for the development.
 - iv. Access is proposed from Butler Avenue which is a short no-through Access Road and is likely to have a significantly detrimental impact on the amenity of residents and locality.
 - v. Outdoor play areas are located adjacent to boundaries with residential properties, which may have a negative impact on the adjoining residents.
 - vi. The introduction of a commercial Child Care Centre into the predominantly residential area will likely have a detrimental impact on the amenity of the locality in regards to traffic and parking, and consequent safety issues.

3. The proposed building significantly exceeds the requirements for internal and external play areas under the *Child Care Services (Child Care) Regulations 2006*. This unnecessarily increases the bulk of the building, impacting on the existing residential amenity of the area. It also provides an opportunity for an application to be made in the future to increase the number of children at the centre, which could then potentially have an even greater impact on residential amenity.

Should the Metro West JDAP decide to approve the application, the following conditions and advice notes are recommended:

1. All development shall occur in accordance with the approved drawings (Development Application DA2019.00047), as amended by these conditions.
2. Prior to the issue of a Building Permit Lot 19 (164) Alfred Road and Lot 18 (162) Alfred Road shall be amalgamated and a Certificate of Title issued to the satisfaction of the Town of Claremont. Alternatively, the applicant may apply for amalgamation and enter into a legal agreement with the Town prior to the issue of a Building Permit to ensure amalgamation occurs within 12 months of the issue of a Building Permit. The legal agreement shall be prepared by the Town of Claremont's solicitors, with all associated cost to be paid for by the applicant, and shall be entered on the Certificate of Title as an Absolute Caveat.
3. A maximum of 65 children and 12 staff are to be accommodated on the site at any time.
4. The Child Care Centre operation shall be carried out in accordance with the Noise Management and Child Supervision Policy to the satisfaction of the Town of Claremont.
5. Any parent gatherings and meetings shall be staggered to be conducted at different times for the different age groups.
6. A minimum of 19 car parking bays are to be provided on site, and all car parking and accessways are to be no closer than 5m to any adjoining property boundary to the satisfaction of the Town of Claremont. The internal tandem car parking bay shall be marked "Staff Only".
7. The dimensions of all car parking bays, aisle widths and circulation areas complying with the Australian Standard AS/NZS 2890.1/2004.
8. A median splitter island with associated intersection geometry and changes to the pedestrian path linkages shall be constructed on Butler Avenue at the intersection with Alfred Road to improve traffic and pedestrian safety at the intersection to the satisfaction and design requirements of the Town of Claremont at the cost of the applicant.
9. A median island shall be constructed opposite the left in only Alfred Road crossover which is to be relocated 5m to the west (and signposted as "No Exit") to prevent vehicles turning right into the crossover from the west and vehicles exiting the crossover to the satisfaction and design requirements of the Town of Claremont, at the cost of the applicant.
10. The building layout shall be redesigned so that outdoor play areas are not directly abutting the adjoining residential property boundary to the east in accordance with Town of Claremont Local Planning Policy 206 – Child Care Centres.
11. The size of the building shall be reduced to meet the requirements of the *Child Care Services (Child Care) Regulations 2006* for indoor and outdoor play areas to accommodate 65 children to the satisfaction of the Town of Claremont.
12. The construction materials of the Child Care Centre is to include all recommendations from the Acoustic Assessments, to the satisfaction of the Town of Claremont.
13. All proposed signage is to comply with Town of Claremont Local Law Relating to Signs.
14. A Waste Management and Delivery Plan shall be submitting prior to the issue of a Building Permit. All servicing and deliveries, including waste collection, for the site are to take place during the operational hours and not during peak morning drop-off or peak afternoon pick-up periods of the Child Care Centre, and limited to 10.00am to 3.00pm on weekdays to the satisfaction of the Town of Claremont.

15. Masonry fencing to a height of 2m shall be installed along the eastern and southern adjoining property boundaries.
16. All fencing along the northern and western street boundaries shall comply with the Town of Claremont Fencing Local Law 2000.
17. No building, wall, fence or landscaping greater than 0.75 metres in height, relative to the verge or footpath, is to be constructed within 1.5 metres of a vehicular access way unless such wall or fence is constructed with a 1.5 metre truncation where the driveway intersects the verge or footpath to the satisfaction of the Town of Claremont.
18. A Construction and Site Management Plan detailing access to the site, the delivery and storage of materials and the parking of tradespersons is to be approved by the Town of Claremont prior to the issue of a Building Permit and implemented for the duration of construction.
19. Street tree removal is not approved as part of this Development Approval.
20. The existing crossovers are to be removed and the verge reinstated prior to occupation of the development to the satisfaction of the Town of Claremont.
21. New crossovers are to be designed for pedestrian path to have priority to the satisfaction of the Town of Claremont.
22. Vehicle access is to be designed in such a manner as to prevent storm water entering the property from the road and footpath to the satisfaction of the Town of Claremont.
23. The external materials and colour finishes of the development are to be to a standard such that it complies with the requirements of Clauses 76 and 77 of the Town of Claremont Local Planning Scheme No. 3, to the satisfaction of the Town of Claremont.
24. All storm water is to be retained on the site. Details are to be provided on the application for Building Permit to the satisfaction of the Town of Claremont.
25. Prior to the issue of a Building Permit, a Crime Prevention Through Environmental Design audit of the proposed development inclusive of any design detail modifications.

Advice Notes:

- (i) This is not an approval to commence development. A Building Permit must be obtained from the local government's Building Services prior to the commencement of any building works.
- (ii) The applicant/owner is advised of the following health requirements from the Town's Health Services. For further information please contact the Town's Health Services on 9285 4300:
 - The development and use of the land is required to comply with the *Environmental (Noise) Regulations 1997*.
 - The applicant is required to remove any hazardous materials encountered during construction/demolition at their own expense and in accordance with the Code of Practice on Safe Removal of Asbestos (NOHSC: 2002 (1988) as stipulated by the *Occupational Health and Safety Regulations 1996*, and disposed of in accordance with the *Health (Asbestos) Regulations 1992* and the *Environmental Protection (Controlled Waste) Regulations 2004*.
 - All plant and machinery (such as air-conditioners and pool pumps) are to be suitably sound proofed to comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* and so as not to cause an adverse impact on the amenity of any adjoining residential properties.
 - Under the *Environmental Protection (Noise) Regulations 1997* no work is to be permitted or suffered to be carried out:
 - a) Before 7.00am or after 6.00pm Monday to Saturday inclusive, or
 - b) On a Sunday or on a public holiday.

- (iii) If the applicant is aggrieved by this determination a right of review may exist under the *Planning and Development Act 2005*. An application for review must be lodged with the State Administrative Tribunal (www.sat.justice.wa.gov.au) within 28 days of the determination.

FINANCIAL AND STAFF IMPLICATIONS

Nil

POLICY AND STATUTORY IMPLICATIONS

Nil

STRATEGIC COMMUNITY PLAN

Liveability

We are an accessible community with well-maintained and managed assets. Our heritage is preserved for the enjoyment of the community.

- Balance the Town's historical character with complementary, well designed development.

URGENCY

As the Town is required to provide a RAR to the Metro West JDAP secretariat by midday on Wednesday 18 December 2019, Council is now required to reconsider the application for Development Approval.

CONCLUSION

Based on the above, it is recommended that the recommendation be supported by Council and the Officer's RAR be forwarded to the JDAP.

VOTING REQUIREMENTS

Simple majority decision of Council required.

OFFICER RECOMMENDATION

JDAP Recommendation

THAT Council:

1. Support the Officer recommendation to the Metro West Joint Development Assessment Panel that Development Approval be refused for the development of a Child Care Centre at Lots 18-19 (162-164) Alfred Road, Swanbourne for the reasons detailed in the Council report.
2. Authorise the Director Planning and Development to forward a report on the application to the Metro West Joint Development Assessment Panel.

ADDENDUM

APPLICANT RESPONSE TO CARDNO REPORT

16 December 2019

Rowe Group
3/369 Newcastle Street
PERTH, 6003 WA

Attention: Nathan Stewart

Dear Nathan,

**RE: RESPONSE TO CARDNO'S TECHNICAL MEMORANDUM ON PROPOSED
CHILDCARE CENTRE DEVELOPMENT AT 162 & 164 ALFRED ROAD, SWANBOURNE**

INTRODUCTION

Transcore prepared a Transport Impact Statement (TIS) in April 2019 for the proposed Childcare Centre development (hereafter CCC) at 162 & 164 Alfred Road in Swanbourne, Town of Claremont. Following the SAT mediation process, a revised TIS report with updated development plans was subsequently issued in November 2019 in order to address the City's comments and requests for design modifications.

In November 2019 Cardno prepared a Technical Memorandum (hereafter CTM) on behalf of the "Residents Group of Mount Claremont" in which Transcore's revised TIS was reviewed and commented upon. This report therefore aims to address comments made in the CTM.

The subject site is located at the south-eastern corner of the Alfred Road/Butler Avenue intersection, some 85m west of the Rochdale Road/Alfred Road/Myera Street signalised intersection. The location of the subject site within the local context is indicated in **Figure 1**.

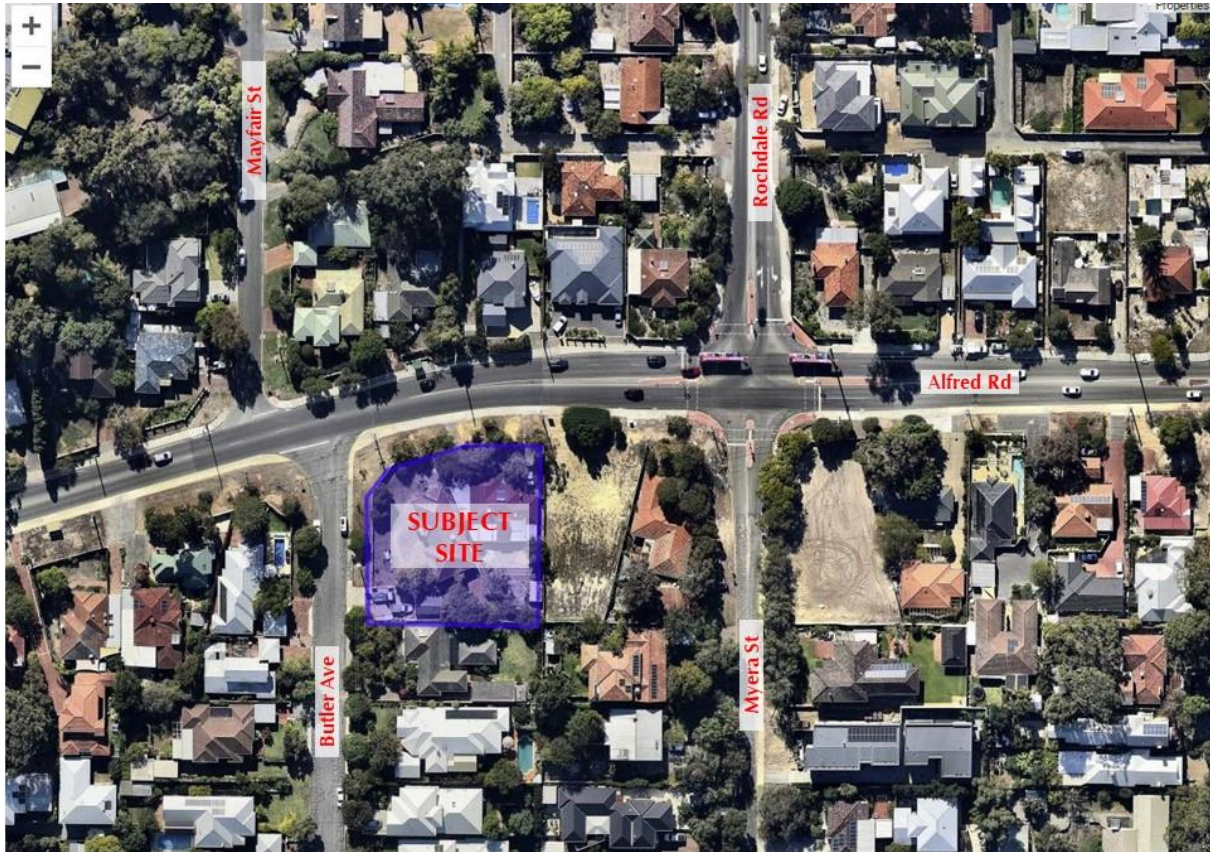


Figure 1: Location of the subject site

CARDNO'S COMMENTS AND TRANSORE'S RESPONSES

CTM: *Sightlines east along Alfred Road from Butler Avenue intersection are hindered by large trees within southern road verge (Figures 3-2 and 3-3).*

Transore: In June 2019 Transore prepared a letter-report addressing previous Cardno comments regarding the Alfred Road/Butler Avenue intersection sightline issue in which it was demonstrated that the required 95m sightline warrants at this intersection are met. Since then, a powerline pole previously located at the southwest corner of the intersection was removed thus improving the sightlines at the intersection.

The sightline assessment using the appropriate formula and site-specific factors (some of which are conservative for robustness) such as: 85th percentile traffic speed (source: Main Roads WA), observation and reaction time (higher speed urban roads), deceleration coefficient (norm-day and norm-night sealed roads) and longitudinal road grade has shown that the required SISD has been calculated to be 95m. This would equate to a vehicle driver travelling in the westbound direction along Alfred Road and just passing the Rochdale Road traffic signals being able to observe the top of a stationary vehicle at Butler Road intersection (and vice versa). The site observation suggests that this is the case. Sightlines along Alfred Road to the west of Butler Avenue are unrestricted (refer SISD assessment plan attached **Appendix A** in for more details.)

Cardno questioned the use of 85th percentile speed as the design speed for this assessment. However, the use of 85th percentile speed to determine the design speed is the method actually recommended in Austroads guidance. Austroads guidance indicates that a design speed 10km/h above the posted speed limit would be used where actual 85th percentile speed is not known.

The figures 3-2 and 3-3 included in CTM illustrating visibility from the intersection to the east are intended to demonstrate the impact from the existing verge trees on the sightlines along Alfred Road. However, the photos taken from the vehicle are not a good representation of the actual situation as these were taken further back from the stop line than the required 3.0m setback as specified in the relevant *Austroads Guide to Road Design Part 3* and *Part 4A* publications which instruct how the sightline analysis should be undertaken.

Furthermore, CTM figures 3-2 and 3-3 clearly show the traffic signals at the Alfred Road/Rochdale Road/Myera Street intersection, which is the approximate location where an incoming vehicle should be located for a stationary vehicle at Butler Road to observe it and react accordingly. It is clear from the figures that this is the case.

Transcore agrees that the sightlines could be further improved by appropriate under-pruning of the existing street trees on the Alfred Road verge. This would be the responsibility of the Town of Claremont as the authority responsible for management of these street trees, so if these street trees are considered to have an unsatisfactory impact on available sightlines then that would be an existing problem to be remedied by the Town of Claremont and not a new issue associated with the proposed development.

CTM: *Based on Austroads Guide to Road Design Part 4A document and relevant calculation and graph for turning treatment warrants Cardno suggests that a channelised right-turn pocket is required on Alfred Road at the Butler Avenue intersection in the post-development stage.*

Transcore: The latest Austroads warrants are provided in Austroads Guide to Traffic Management Part 6, which adds guidance for urban roads with design speed less than 70km/h, which was not provided in the older Austroads Guide to Road Design Part 4A. The calculation of the warrants is very sensitive to speed and was previously over-prescribing turn treatments on lower speed roads, say urban roads of 50km/h or 60km/h. Transcore previously prepared a paper on that matter and provided a copy of that paper to Austroads for consideration when the 2017 Austroads guides were being prepared. An extract of this paper is provided in **Appendix B** of this report. Cardno has used the turn warrants for design speed less than 100km/h instead of the more appropriate warrants for design speed less than 70km/h, so they have overestimated the warrants for upgrading of this intersection.

Hence, if the formula and associated turn treatment warrants graph is adjusted for the appropriate speed on Alfred Road the outcome would clearly suggest that no right-turn treatment is required for the Alfred Road/Butler Avenue intersection in the post-development stage for either of the two trip distribution scenarios assessed (i.e. 30/70 and 70/30 west/east trip distribution of development's traffic along Alfred Road. Refer **Figure 2** and **Figure 3** for more details based on 60km/h speed limit. The graph and

calculations are showing an auxiliary right-turn treatment (AUR) which is generally not applied in the urban setting, particularly for a brownfield development such as this.

This is to be expected considering that the proposed CCC is a moderate traffic generator as defined in the *WAPC Transport Assessment Guidelines* which results in moderate traffic impacts on local roads.

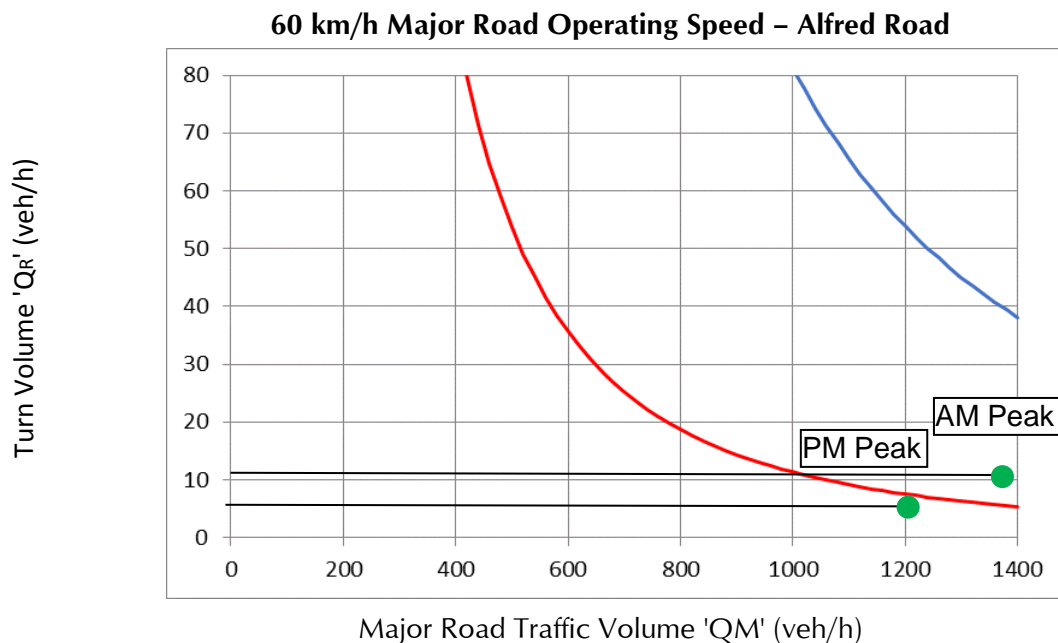


Figure 2: Right-turn treatment calculation – AM & PM peaks (30/70 scenario)

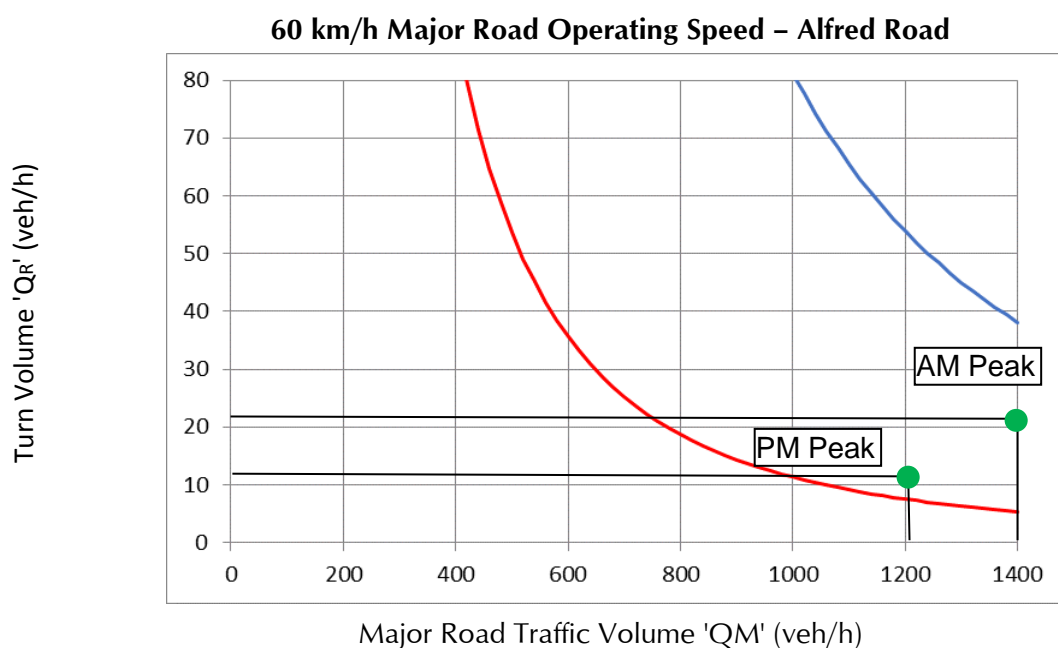


Figure 3: Right-turn treatment calculation – AM & PM peaks (70/30 scenario)

CTM: Cardno's SIDRA intersection analysis shows that queues along Alfred Road back from Rochdale Road/Myera Street signals are extending past the Butler Avenue intersection during morning peak periods thus impacting vehicles turning right in and out of Butler Avenue.

Transcore: Transcore has undertaken SIDRA analysis of the signalised Alfred Road/Rochdale Road/Myera Street intersection using latest available SCATS data (sourced from Main Roads WA) combined with turn count surveys undertaken at the two intersections during the combined development peak traffic activity and peak road network morning and afternoon peak periods (8:00-9:00AM and 4:30PM-5:30PM) on 21st October 2019. The SIDRA assessment is therefore based on actual recorded phasing, timing and sequence plan for the signalised intersection. The analysis has been undertaken for and discussed in the revised TIS November 2019.

As reported in the revised TIS report, the results of the SIDRA analysis of the Alfred Road/Rochdale Road/Myera Street signalised intersection have shown that the queues on Alfred Road west do occasionally extend to Butler Road during the morning peak period only. However, further detailed analysis indicates that this scenario is only experienced during about 15% of the morning peak hour period (i.e. total of 9 minutes) suggesting that during most of the peak hour the right-turns in and out of Butler Avenue can occur unhindered. Furthermore, the proximity of signals to Butler Avenue secures breaks in westbound traffic flows on Alfred Road, thus facilitating egress movements out of Butler Avenue.

A review of Cardno's SIDRA assessment suggests that incorrect signal timing data was used in the CTM analysis which can result in worse than realistic queueing outcome for the intersection.

CTM: Access along District Distributor A roads (i.e. Alfred Road) is generally not desirable in accordance with Main Roads Functional Road Hierarchy Criteria. WAPC childcare centre guidelines states that the access into CCC is not suitable where "access is from a major road or in close proximity to a major intersection where there may be safety concerns".

Transcore: Both Main Roads WA and WAPC documents suggest that direct access from major roads is not desirable but does not go as far as prohibiting such accesses. This is due to inherent site constraints in brownfield sites like this one where such accesses are the only feasible ones.

The proposed CCC access from Alfred Road is a restricted left-in only access which will not have a practical impact on the operation of Alfred Road traffic. No egress movements are proposed for this crossover and as such no safety issues are to be expected.

It should also be noted that it was the Town of Claremont that recommended this Alfred Road access and as such the original development plans have been modified to accommodate this explicit request by the Town during the SAT process.

CTM: The minimum required Sight Stopping Distance (SSD) of 45m is not met at Butler Avenue crossover due to proximity of Alfred Road intersection to the north in accordance with AS 2890.1.

Transcore: In line with AS2890.1 the sightline assessment measured 2.5m back from the driver's position on the CCC driveway towards the oncoming vehicles along Alfred Road. Although there is approximately 40m separation between the proposed CCC driveway on Butler Avenue and Alfred Road intersection if the line of sight is measured appropriately around the curve and taking into account property boundaries, the achieved sightline is approximately 51m (refer **Figure 4** for more details). Accordingly, the required minimum SSD sightlines for the CCC Butler Avenue crossover are exceeded. It should also be noted that a vehicle turning left from Alfred Road into Butler Avenue will actually only be turning at about 20 to 30km/h and will not require the 45m stopping sight distance suggested by Cardno for 50km/h.

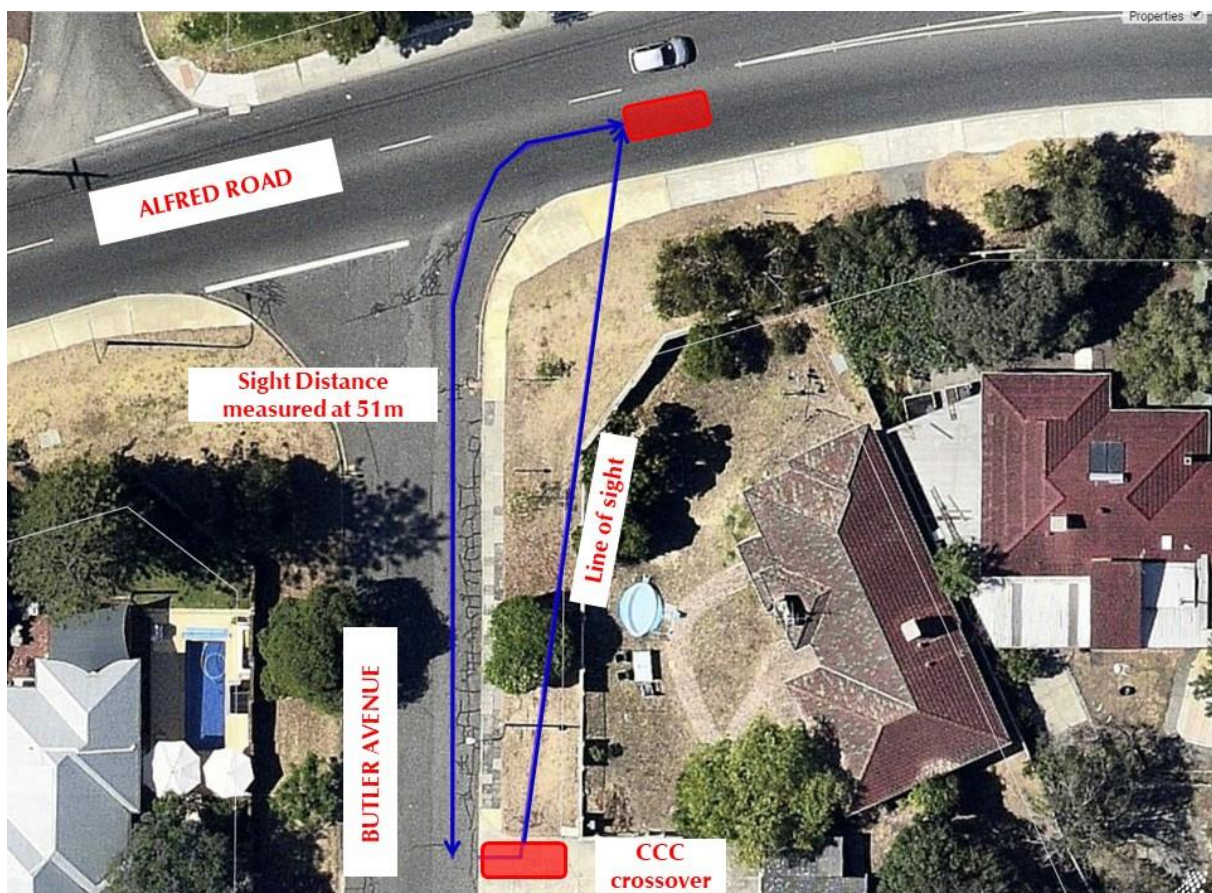


Figure 4: SSD sightline assessment – Butler Avenue crossover

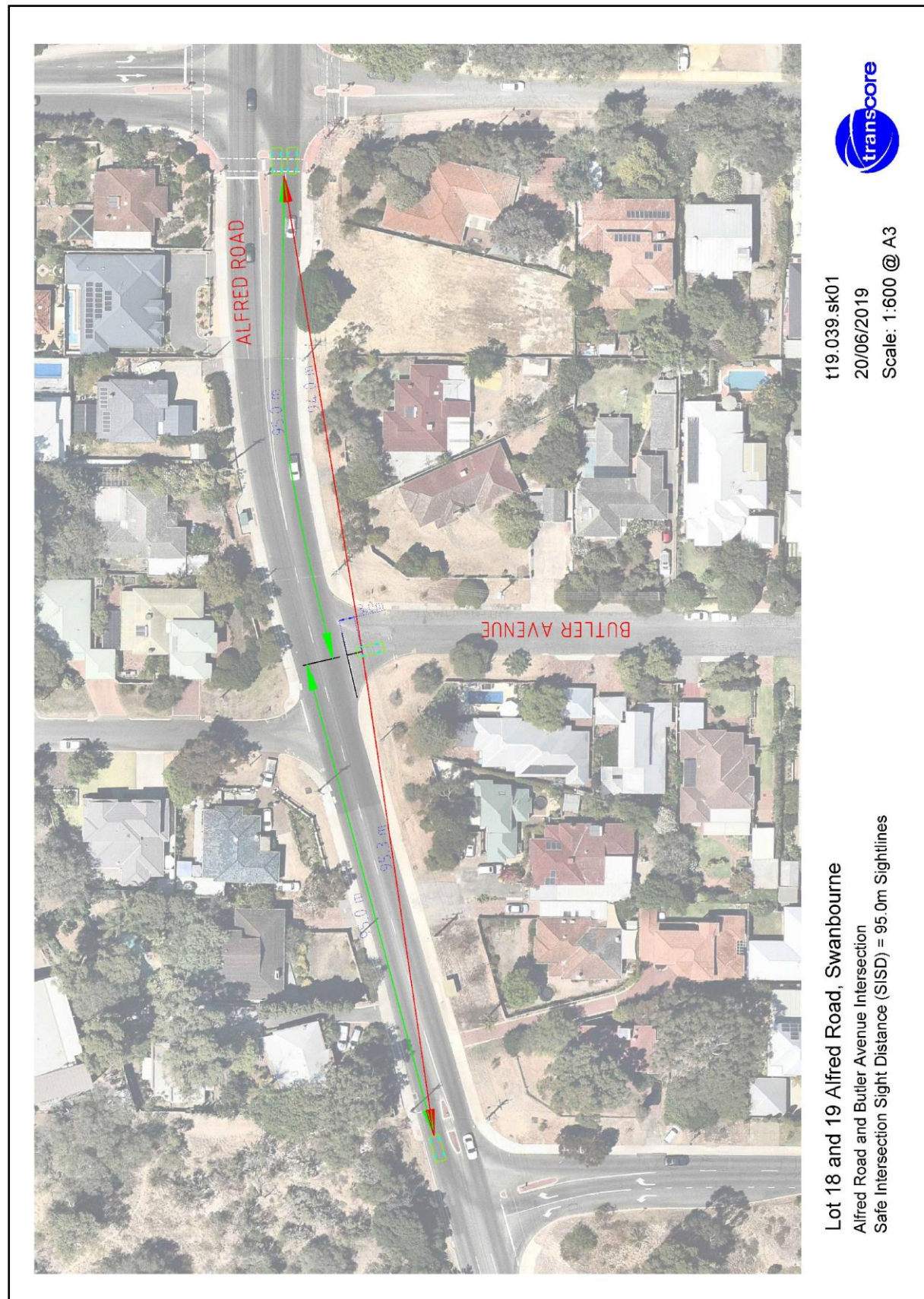
Yours sincerely,

Rob White

Robin White
Senior Traffic & Transport Engineer

Appendix A

SISD SIGHTLINE ASSESSMENT PLAN



Appendix B

**EXTRACT FROM TRANSCORE'S PAPER ON AUSTROADS GUIDE
TO ROAD DESIGN PART 4**

Review of turn treatments in Austroads Guide to Road Design Part 4

Austrroads Guide to Road Design Part 4: Intersections and Crossings: General (2017) introduced new warrants for turn treatments on high-speed roads (>100km/h operating speed) and on low and intermediate speed roads (<100km/h operating speed), with graphs on page 45 presenting those warrants in terms of turning traffic volume against the opposing major road traffic volume (vehicles per hour).

Recently in Western Australia there have been a number of instances of local government engineers relying upon that guidance to determine the requirement for turn treatments to be constructed at various unsignalised intersections. However, the warrants only distinguish between roads as having speeds above or below 100km/h. Experienced traffic engineers would generally agree that accident frequency and severity are more likely to be greater at higher speeds, so there is some concern that relying on these warrants (above or below 100km/h) is very likely to over-prescribe the construction of costly turn treatments like channelised right turn lanes and left turn slip lanes on lower speed urban roads (eg. 50 or 60km/h speed limits).

The new warrants rely on the methodology put forward in a paper by Arndt and Troutbeck titled New Warrants for Unsignalised Intersection Turn Treatments at the 22nd ARRB Conference (2006). This paper presented the two graphs that were subsequently included at page 45 of Austrroads Part 4A (2009).

For the graph for low and intermediate speed roads (<100km/h operating speed) a speed of 80km/h is used in the calculation of the expected number of rear end accidents on the major road. The formula used for this calculation includes the factor $SMT^{2.94}$ which is the 85th percentile speed (in km/h) on the major road raised to the power of 2.94. Using 80km/h in this equation makes this factor equal to 393,626 whereas using 60km/h would make this factor only 168,952. In other words, this factor is 2.33 times higher at 80km/h than at 60km/h and therefore this formula predicts 2.33 times more rear end accidents at an intersection on an 80km/h road than on a 60km/h road, all else being equal.

The curves shown on the graphs represent the level of traffic volumes where the cost of constructing the next higher-level right turn treatment are equal to the saving in the cost of accidents that would be achieved, in other words a benefit cost ratio of one. However, in the <100km/h graph these curves are calculated specifically for a major road operating speed of 80km/h. As noted above, this calculation is quite sensitive to the speed on the major road. The net effect is that for lower speed roads these curves should be shown above correspondingly higher traffic volumes on the major road. In the case of a 60km/h road the major road traffic volumes on this graph should be multiplied by 2.33 to give the correct traffic volumes equating to a benefit cost ratio of one. Similar factors could be calculated in the same way for other operating speeds ranging from 50km/h to 100km/h to apply to this graph.

To assist with application of the additional information brought to light in this review a series of graphs has been prepared using the same formula and values as documented in Arndt and Troutbeck (2006). It is suggested that the graph for 110km/h operating speed should continue to be applied for roads with operating speed >100km/h, as currently used in Austrroads Part 4 (2017), but the following graph for road with operating speed of 60 km/h should be used in place of the graph for roads with operating speed <100km/h in Austrroads Part 4.

60 km/h Major Road Operating Speed

