

Forrestfield North Residential Precinct Local Structure Plan**Submission Table**

Submission No.	Assess No.	Submission	Officer Comments
1.	A7167	<p>Comment</p> <ol style="list-style-type: none"> 1. Have been in the area for approximately 14 years. 2. Our property is identified in Cell 6 and it is proposed that the property is rezoned to R60-R80, Medium Density. In this regard: <ol style="list-style-type: none"> a. We agree and are pleased with proposed R-Coding for the property. b. We agree with division of the development area into Cells, as this should support flexibility for development options and allow a wider range of developers to show interest in purchasing properties or groups of properties. We are currently working with all Landowners in Cell 6 to explore options to sell to any potential developers as a group. 3. Our primary concern is that the mandatory contributions to the Development Contribution Plan will be too high for the developers to present an acceptable offer for the land. We believe that other options through the State and Federal government should be pursued to: <ol style="list-style-type: none"> a. Reduce the risk of fragmented zonings; and b. Reduce the DCP burden and ensure that all landowners are properly compensated. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. The modified Local Structure Plan (LSP) has removed the Littlefield Road neighbourhood connector, modified the Transit Oriented Development (TOD) Connector Boulevard and reduced the amount of Public Open Space (POS), which may reduce the Development Contribution Plan (DCP) costs. The future DCP is required to meet the underlying principles for development contributions, including a need to establish a connection between, and the demand generated by, the development and the infrastructure funded through the DCP. Importantly the LSP should be structured in a manner that enables viable delivery of the required subdivision and development by the private sector. The DCP cannot be commenced until the Residential Precinct is progressed to a level of certainty and the TOD Precinct is also progressed to a level of certainty.
2.	A7284	<p>Objection</p> <ol style="list-style-type: none"> 1. We are situated in the 'Green Belt' which consists of public open space and conservation. 2. Wavy Leaf Smokebush Conservation Area: Concerns on how the protection of this area is going to be enforced. Noted that the location of the Primary School has not been classed as conservation despite it being covered in Wavy Leaf Smokebush when flowering. 3. Native Wildlife: With the increase to high/medium density more cats and dogs will move to the area with the potential to eradicate wildlife. 4. Peoples Safety: The isolation of Brand Road by making it a Green Belt, conservation and POS area will deter people from walking (exercise) in the area for fear of people lurking in the POS/conservation areas. 5. Hooning Cars/Antisocial Behaviour: Having few houses on Brand Road will encourage hooning behaviour, which is already prevalent in the area. Concerns that fewer of residences in the area will also lead to a slower Police response to callouts. 6. Drug Use: Fears of increasing drug use in the area due to remoteness. 7. Arson Fires: Conservation area and fewer residences in the area will be a temptation for Arsonists to start fires. 8. School: A School located opposite Public Open Space has opportunity for undesirables to lurk in the bushes e.g. paedophiles etc. Also increased chance of vandalism to the school as nobody would see the vandalism taking place. 9. Rubbish Dumping: There is a prevalent problem with people from outside the area dumping their rubbish, which includes furniture and general waste, along the road verges on either side of the road. This problem can only get worse with fewer houses in the area. 10. Can foresee problems escalating with increased population. 	<ol style="list-style-type: none"> 1. Noted. 2. The future management of the Environmental Conservation areas is yet to be determined. This will need further discussion with the Western Australian Planning Commission (WAPC) following the determination of the Local Structure Plan (LSP). The Environmental Conservation areas will require a Conservation Management Plan to consider, among other matters, controlling access and monitoring, particularly adjacent to recreational spaces. The AECOM Level 2 flora spring survey that was undertaken in 2016 did not locate any Wavy Leaved Smokebush on the proposed primary school site. 3. The planning framework is unable to respond to broader pet ownership choices and behaviours of the community. Any future pet ownership will be required to comply with relevant registration requirements. 4. The street network, subdivision and development of the LSP area will, through appropriate design guidelines, address Crime Prevention through Environmental Design (CPTED) principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design. The broader design of the LSP has also taken this into consideration by ensuring development fronts public spaces where possible. 5. There is no evidence to suggest that the LSP will facilitate hooning or antisocial behaviour. Appropriate road treatments will need to be considered at the subdivision stage to minimise speeding and hooning behaviour. 6. The planning framework is unable to respond to issues relating to drug use. The LSP area will, through appropriate design guidelines, address CPTED principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design. The area will also be well connected to the public transport network through the future station in High Wycombe. 7. The planning framework is unable to respond to issues relating to arson. The LSP area will, through appropriate design guidelines,

			<p>address CPTED principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design.</p> <p>8. The LSP area will, through appropriate design guidelines, address CPTED principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design.</p> <p>9. The residential density in the area is proposed to be increased in the LSP, not reduced. The LSP area will, through appropriate design guidelines, address CPTED principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design. The Environmental Conservation areas will require a Conservation Management Plan to consider, among other matters, controlling access and monitoring, particularly adjacent to recreational spaces.</p> <p>10. The LSP area will, through appropriate design guidelines, address Crime Prevention through CPTED principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design.</p>
<p>3.</p>	<p>A7301</p>	<p>Objection</p> <ol style="list-style-type: none"> 1. Draft Plan results in some residents (specifically those on Brand Road) being significantly disadvantaged in being able to sell property on the open market. Proposed land use for this area (combination of Local Open Space and environmental conservation) will devalue property and creates further uncertainty (there has already been uncertainty for a number of years) for when properties will be purchased (i.e. no one will purchase properties at present given the uncertainty of the future land use.) The City of Kalamunda planner has advised that properties are unlikely to be purchased for between 5 and 20 years which is unacceptable, meaning the Draft Plan has created a setting which provides residents with no certainty or clarity, or the ability to sell their properties. 2. The proposed land use in the Draft Plan is a significant change from previous discussions with the City of Kalamunda. This significant change has resulted in us having a completely different outlook concerning our property and future plans. 3. We seek clarity from the City of Kalamunda on the proposed developer contribution process to ensure we receive a fair and reasonable price for our property within a short period of time (i.e. not 5 years or more). 4. Environment: The amount of public open space in one area, i.e. Brand Road, is not appropriate. The area will be isolated from the general population and will result in rubbish tipping, general bad behaviour such as car burnouts, drug taking and dealing, and purposely lit bush fires. This area will be difficult to police and eventually will be used as a tipping area and wasteland. 5. The proposal that this area is to be preserved for the bandicoots and smoke bush is absurd given the urban infill (increase in houses and population) proposed for the area as a whole. New residents will also bring pets resulting in the decimation of the fauna and flora in this area anyway. 6. Concrete Jungle: The areas that have been allocated as high density are too concentrated given the large size of the area as-a-whole. The rationale for 'squeezing' a high number of houses into a small area, and not spreading this infill, has not been explained, and lacks holistic planning approach plan for the entire area. 7. Based on conversations with the planner we understand 15,000 residents will be located in one area without a localised park. This proposal once again lacks a holistic approach to planning, reduces localised space for recreation, and does not consider a reduction in garden space of apartment blocks / town houses. 	<ol style="list-style-type: none"> 1. Acquisition for Local Open Space (LOS), road reservation or Community Purpose will occur as the need arises from the pattern and staging of development/subdivision in the area and when the funds are committed and available through a future Development Contribution Plan (DCP). The City is investigating ways that these sites can be acquired, whether it be from third party offsets or from State or Federal Government. 2. The District Structure Plan (DSP) adopted 2016 identified the area to be Medium Density Residential. The DSP does not allocate Public Open Space (POS), this is a function of the Local Structure Plan (LSP). POS is a consistent land use within a medium density residential area. 3. The DCP cannot be commenced until the Residential Precinct is progressed to a level of certainty and the Transit Oriented Development (DCP) Precinct is also progressed to a level of certainty. The City is not able to acquire POS land until the City has collected enough DCP funds from development. This will mean that timing for acquiring the subject land is dependent upon the timing of development of this area, which is difficult to predict as it is dependent on market forces and the take up of development. Council may consider pre-funding certain infrastructure item but this will be subject to a separate process and detailed considerations. 4. The proposed LOS will be fully maintained and managed by the City. The Conservation Areas will be either managed by the City or by the State Environmental agency with responsibilities being allocated through an application Conservation Management Plan. The LSP area will, through appropriate design guidelines, address Crime Prevention through Environmental Design (CPTED) principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design. The area designated to POS within the 'green link' has been reduced as part of the modified LSP. 5. The planning framework is unable to respond to broader issue of pet ownership and management. 6. The Forrestfield North area was identified as one area under the State Government Metronet initiatives. One of the objectives of the Metronet project is to accommodate more population around the train station areas in order to capitalise from the investment of the train station. This is one of the sustainable planning principles.

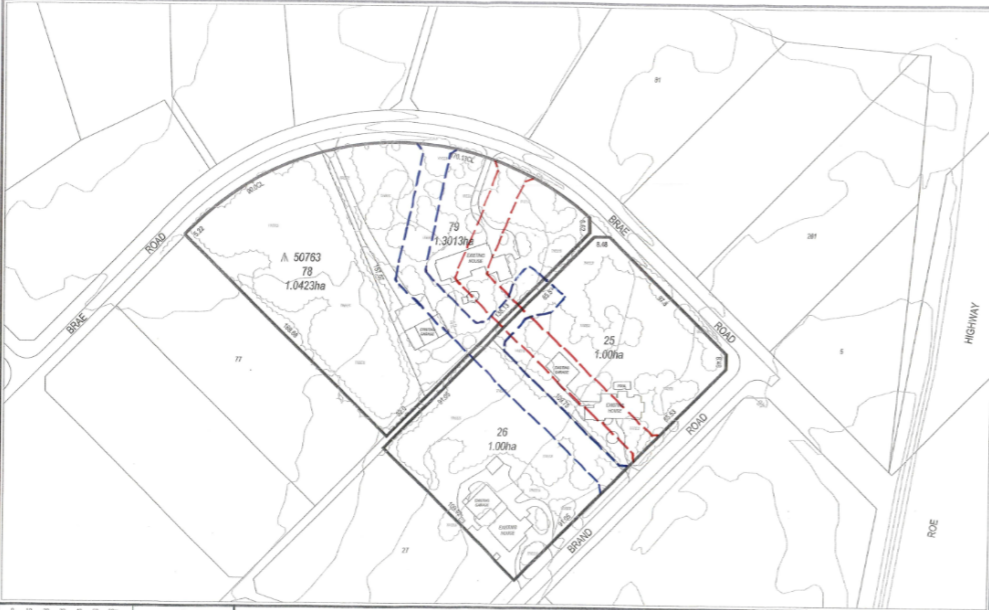
			<p>7. The LSP estimates a population of approximately 8,582 residents within the Residential precinct. The figure of 15,000 people may have been referring to the Forrestfield North area as a whole, including the TOD precinct. The LSP proposes open space in the form of LOS, Environmental Conservation and Bush Forever. These spaces are proposed to create recreation opportunities for future residents of the area.</p>
<p>4.</p>	<p>A7234</p>	<p>Objection and Comments</p> <ol style="list-style-type: none"> 1. Overall plan seems ok. Question why a large volume of designated Public Open Space has been placed in the Eastern Section of the Development. 2. Assumes, due to the amount (22%) of POS in Forrestfield North Residential Precinct, that there will be very little POS in Transit Oriented Development, and Brand Road Open Space will be utilised to offset the lack of POS in TOD. 3. The Community Hub is well placed between the Transit Oriented Development and the Forrestfield North Development. 4. With so many people in the area a new primary school is a great inclusion. 5. Unsure why the new main road that runs through the development has to be 30 metres wide. That land is paid for by the Developer Contribution Payment, as the traffic bridge over Roe Hwy is. 6. Lives in Brand Road, part of the Green Link. 7. Including some small blocks, e.g. 80sqm as they do in other developments, in the Green link would have some positive effects. Having people in the Green Link would hopefully reduce some of the predicted anti-social behaviour. People would like to live in a bush environment and would become custodians of the area. It would also make the blocks of land on Brand Road more attractive to developers, able to build and develop a small environmentally friendly precinct. 8. Public Open Space should be dispersed more evenly throughout the development, so it doesn't end up a concrete jungle. 9. People will have to walk a long way to use Public Open Space as approximately 80% of it is located in one area (Brand Road West), which happens to be the furthest point from the High Density Residential Zone. In most developments Public Open Space is placed throughout the area to make it safe and convenient for families to gain access to them. 10. The plan impacts on ability to sell property for the following reasons: <ol style="list-style-type: none"> a. Without any Urban Development on land, no developers are going to be interested in purchasing it. b. Have been advised that the developer will pay market value for the land but haven't been advised when. Have also been advised that if there is no money left in the developer contribution payment, residents will get virtually no money for their land. c. Cannot sell the house and land on the open market because due diligence means the realtor has to disclose to prospective buyers that the property is eventually going to be POS and conservation land. d. Lack of timeline for property purchase, and location of property meaning it would be one of the last purchased, destroys hope for a bright future. e. When a large quantity of people reside in a confined area, the public open spaces tend to become a gathering area for undesirables, especially at night. 11. Problems associated with such a large area of bush tend to be drinking, drug dealing and taking, arson, hooning and illegal dumping. 12. Introduction of so many people brings with it cats and dogs, a potential predator of native wildlife which is already on the decline. 	<ol style="list-style-type: none"> 1. The eastern section has a concentration of identified conservation areas which presents an opportunity to be linked by Local Open Space (LOS) to form an ecological corridor. 2. The minimum Public Open Space (POS) requirement as per State policy is generally 10%. The unrestricted LOS provided in the modified Forrestfield Residential Precinct Local Structure Plan (LSP) is approx. 15.89% of which approximately 8.35% is the City's land. Depending on the design of the Transit Oriented Development (TOD) LSP, it is anticipated that the TOD Precinct may share some amount of LOS with the Residential Precinct. In this instance, the TOD area will contribute towards POS through cost sharing arrangements (i.e. Development Contribution Plans). 3. Noted. 4. Noted. 5. The 'TOD Connector' is identified as potentially a key link between the future train station and future urban development area in Maida Vale South. The 30m road reserve has been designed to have regard to Liveable Neighbourhoods principles and has been identified to accommodate vehicle carriageway, median, bus lane, embayment parking, cycle path, street trees, utilities and pedestrian footpaths. Modifications have been proposed as part of the revised plan which reduces the extent of the road and identifies the future fly over as a potential connection. Details as to the inclusion of the infrastructure as a DCP item will need to be established as part of consideration of the DCP. It is important to note that any items in the DCP will be required to be advertised to landowners in a similar manner to the progression of the LSP to subject of this submission. 6. Noted. 7. The modified LSP has replaced an area of LOS within the 'green link' and included residential medium/high density in response to this matter. 8. The location of LOS is designed to facilitate spaces for people to recreate and to encourage conservation and biodiversity. The three main areas of LOS, being the 'Green Link', 'Educational and Sports Space precinct' and the Centralised 'town park'. The LOS is considered to be distributed to the greatest extent possible, having considered environmental values and the future community needs/uses. 9. Western Australian Planning Commission (WAPC) Liveable Neighbourhoods generally recommends that local parks meet the following locational requirements: <ol style="list-style-type: none"> a. Local parks (3,000m² and smaller) maximum 300m from all dwellings; b. Neighbourhood parks (3000m² – 5000m²) maximum 400m from all dwellings;

			<p>c. District parks (2.5 – 7 hectares) maximum 1km from all dwellings.</p> <p>The LSP as advertised and modified meets the above criteria.</p> <p>10. Where land is being acquired through a future contribution scheme, land value is generally guided by a qualified and independent land valuer. The acquisition of the land will depend on the take up of development. Funds are raised through the Development Contribution Plan (DCP). The schedule of items requiring purchase and timing of acquisition or delivery is dependent on the take up of development, infrastructure demands and availability of funds within the DCP. The LSP area will, through appropriate design guidelines, address Crime Prevention through Environmental Design (CPTED) principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design.</p> <p>11. The street and public open space network, subdivision and development of the LSP area will, through appropriate design guidelines, address CPTED principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design.</p> <p>12. The planning framework is unable to respond to broader issue of pet ownership and management.</p>
<p>5.</p>	<p>A7121</p>	<p>Comments</p> <ol style="list-style-type: none"> 1. At some point in the process we believe there needs to be survey of trees by the Shire (not by developer consultants) of trees worthy of retention regardless of the zoning. These may be veteran trees, some of which would predate European settlement. They may be rarer types that are represented in this ecological community. As a professional Arborist I note that there are many less prevalent tree species that tend to get ignored but they are present in this area i.e. <i>Eucalyptus todtiana</i>, <i>Persoonia elliptica</i>, <i>Xylomelum occidentale</i>, and <i>Banksia incana</i> as examples. Some of these are quite notable specimens. 2. In relation to our property #63, and #79 the boundaries of POS could better be drawn to include areas worthy of retention. The development envelopes in both locations call for the destruction of remnant bushland. In the front of our location it also includes about half a dozen <i>Conospermum undulatum</i> "Wavy- leaved" Smokebush. Regardless of the Smokebush though it is a good example of the remnant bushland. 3. The bridle paths of the area be retained as part of the POS. The one behind our property is completely regenerated or was never cleared in the first place. 4. We have colonies of Western Bearded Dragons, dugites, and Quenda on our property. We would like to encourage the Shire to ensure that more research is done in the area regarding birds and wildlife. From our experience we assure you that this area supports large and diverse numbers of avian and terrestrial wildlife. 5. Attention needs to be paid to Black Cockatoos. We have had permanent numbers of Forest Red Tail Blacks foraging in this area for a long time. In the last week a flock of Carnaby Black Cockatoos did a stopover on our pine tree. They obviously use it as a resting place in the migrations. We also have numerous magpie tribes that occupy different parts of the area. 6. In addition, we would like to make the Shire aware that through our interest in native flora we have planted many rarer plants and plant forms on this area including such species as <i>Grevillea maccutcheonii</i>, of which reputedly only 7 plants remain in the wild, <i>Hakea orthorrhyncha</i> filamentous form, and we are willing to provide a species list of what is growing on the block to the Shire as we have planted this property up as an herbarium/arboretum. 	<ol style="list-style-type: none"> 1. The Local Structure Plan (LSP) currently aims to require that the Cell Density Plans include a Landscape Feature and Tree Retention Plan which will be reviewed by the City on a case by case basis. These plans will need to identify any trees which are worthy of retention through the subdivision and development process. More generally, the City is working towards establishing a significant tree register and a Local Planning Policy for protection of significant trees on development sites. There is a draft Environmental Land Use Planning Strategy (ELUPS) document which has been prepared and has been adopted for the purpose of public advertising which proposed many different strategies for improving environmental outcomes through the planning process. 2. This matter has been further clarified with the submitter who withdrew this comment. To maintain the integrity of the Public Open Space (POS) designation of the 'green link' and not impact on other areas of the LSP the designation of POS and residential on 63 Brae Road has not been changed. The LSP also achieves the target set by Office of the Environmental Protection Authority (OEPA) to protect approximately 90% of wavy leaved smokebush. 3. The environmental values of the existing bridle paths is acknowledged and wherever possible, the bridle paths have been included in Local Open Space (LOS) or Conservation Areas and may form part of a broader pedestrian network at the detailed design phase for POS areas. 4. The City is in the process of identifying and preparing a Green Links Masterplan as part of the draft ELUPS which will incorporate known wildlife corridors, existing reserves and public open space, and wetlands, and identifies methods to improve connectivity between these green spaces. This will assist with fauna migration and protection of habitat for wildlife. 5. Black cockatoo foraging and breeding trees are protected in accordance with the Environment Protection and Biodiversity Conservation Act 1999, which is federal legislation. If removal of the black cockatoo habitat trees is deemed significant as per the 'Environmental Protection

			<p>and Biodiversity (EPBC) Act Referral Guidelines for the threatened black cockatoo species' then it is referred to the relevant agency as part of assessment of a subdivision or development application.</p> <p>6. The City is looking into protection of Local Natural Areas, which is a term used to describe bushland blocks which retain much of the original endemic vegetation or have existing high quality vegetation worth preserving. In the future, the City may develop a strategy, policy or provide incentives to protect these areas. In the meantime, if the property contains known protected flora it is best to register this with the Department of Biodiversity, Conservation and Attractions (DBCA) so they can keep a comprehensive database which will then be updated on the City's mapping information system.</p>
6.	A7153	<p>Non-Objection and Comment</p> <ol style="list-style-type: none"> 1. Plan recommends rezoning property as Medium to High density residential, R60-R80. 2. The LSP groups us together with four other properties as Cell 6. We have spoken to the other neighbours and they too are in favour of the proposal. 3. As a group we are willing to sell to a developer, do not want to develop properties themselves. 4. Support proposal to rezone property as Medium to High Density residential, R60-R80. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted 3. Noted 4. Noted
7.	A27260	<p>Non-objection and Comments</p> <ol style="list-style-type: none"> 1. Plan recommends property be rezoned as R60-R80, medium to high density residential. 2. Grouped with four other landowners as Cell 6. All willing to sell and work with developers. 3. Have no problems with rezoning of property. 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. Noted
8.	A151431	<p>Objection and Comments</p> <ol style="list-style-type: none"> 1. I note that there are specific areas set aside for parks and recreation, local open space and environmental conservation, and after studying them I believe some of these are very good. 2. Littlefield Road will progress through Poison Gully Creek straight through to Ravenswood Road. Poison Gully Creek is Bush Forever Site No. 45. This would be desecration of an already threatened area. I know that for years this site has been cited as a drain: "Poison Gully is part of the Shire's drainage network..." You would be aware that it was a creek long before it became classified as a drain, and is of Aboriginal Heritage significance, once used for a number of rituals and was a women's birthing site. Is it necessary for Littlefield Road to pass through the gully across the creek when there could be other options? There is already a cul de sac on the existing end of Littlefield Road, and if there must be road access why not from Stewart Road to the strand of trees linking the reserve? 3. I have been informed that sewerage pipes will be going through there [Poison Gully] also. How will that work when the pipes have to cross the creek? 4. There are possums, reptiles, quenda, echidna, turtle oblonga, gilgies, five species of frogs, birds and flora which will be compromised in the process. This is a form of collateral damage to both flora and fauna of the area. 5. Judging by the wide swathe of pristine bushland cleared around 19 years ago, along Peregrine and Whimbrel Green along the creek, the impact to the area would be severe and food sources greatly reduced, as well as erosion of the creek banks which has already been taking place during the last twenty years. I remember when 15 to 17 quendas were trapped from the bushland that is now Peregrine Green, to enable sewer pipes to be put through for the new housing development. I heard they were relocated to John Forrest National Park. It was necessary to relocate them, but they should have been kept in the High Wycombe area. 6. To support my concerns, I refer to an extract of the Forrestfield North District Structure Plan: WAPC ref Kala 2015: pp36, 37. 	<ol style="list-style-type: none"> 1. Noted. 2. In response to submissions, the need for Littlefield Road has been reviewed and the Local Structure Plan (LSP) has been amended to remove Littlefield Road extension from the LSP plan as a neighbourhood connector and appropriate local road connections will be required to be provided. 3. Design considerations and decisions for sewer infrastructure crossing Poison Gully will be made by the Water Corporation with the prospective developer of the land. 4. It is noted that there are a number of fauna present at the site and that the relocation of fauna should be considered if habitat is being impacted. The intent is to minimise the impact on fauna by consolidating and retaining to the greatest degree possible, areas of environmental significance. 5. The intent of the LSP is to minimise the impact on fauna by consolidating and retaining to the greatest degree possible, areas of environmental significance. 6. It is noted that there are a number of fauna present at the site which and that the relocation of fauna should be considered if habitat is being impacted. The intent is to minimise the impact on fauna by consolidating and retaining to the greatest degree possible, areas of environmental significance. 7. The environmental values of the existing bridle paths is acknowledged and wherever possible, the bridle paths have been included in the local open space or conservation areas. These paths may also be considered as pedestrian links through the future detailed design of POS area.

	<p>"4.5 A targeted fauna survey was conducted in Autumn 2012 to record black cockatoo and quenda presence, assess black cockatoo habitat value and to record other fauna species of conservation significance. This survey confirmed the presence of the Forest Red-tailed Black Cockatoo, Carnaby's Black Cockatoo and Quenda, and recorded a further 47 fauna species, of which ten are considered of local significance, based on distribution (Bamford 2012). These are:</p> <ul style="list-style-type: none"> • Hooting Frog, Western Marsh Frog (<i>Heleioporus barycragus</i>) • Common Bronzewing (<i>Phaps chalcoptera</i>) • Collared Sparrowhawk (<i>Accipiter cirrocephalus</i>) • Weebill (<i>Smicrornis brevirostris</i>) • Yellow-rumped Thornbill (<i>Acanthiza chrysorrhoa</i>) New Holland Honeyeater (<i>Phylidonis novaehollandiae</i>) • White-cheeked honeyeater (<i>Phylidonyris niger</i>) • Varied Sittella (<i>Daphoenositta chrysoptera</i>) • Golden Whistler (<i>Pachycephala pectoralis</i>). <p>4.47 Searches have been conducted of the DER's Threatened and Priority Flora Database, the WA Herbarium database and the Threatened and Priority Flora Species List for the area. This search identified thirteen flora species of conservation significance as potentially occurring in Forrestfield North. In addition, an EPBC Protected Matters Search was undertaken on 18 October 2011, which identified nine flora species of conservation significance that potentially occur in the area. Of the species identified as potentially occurring in the area, only one species has been formally recorded as a result of flora and vegetation surveys, the Wavy-leaved smokebush, <i>Conospermum undulatum</i> (Shire of Kalamunda 2012), which was recorded throughout the locality.</p> <p>4.6.2 Migratory Species considered to be likely to occur in the area due to the availability of suitable habitat are <i>Ardea alba</i> (Great Egret) and <i>Merops ornatus</i> (Rainbow Bee-eater)."</p> <p>7. Bridle Paths. There are proposed roads for the existing bridle paths around Poison Gully reserve as well. Namely, the track which leads from Littlefield Road to Stewart Road and from Brae Road back to Littlefield Road, a path which is frequently used by horse riders. Surely they can remain 'as is' and the rustic atmosphere of the reserve be retained. The bridle paths beginning directly opposite the junction of Stewart Road, between house numbers 55-59 Brae Road travel around in a U shape ending up opposite house number 86 Brae Road, and are heavily vegetated with the Declared Rare Flora <i>Conospermum undulatum</i>, a priority 3 species, <i>Isopogon drummondii</i>, orchids, <i>Hakea conchifolia</i> and other flora such as the <i>Banksia incana</i>, that has become uncommon to the area already because of the clearing done years ago. Trees along the tracks include <i>Banksia littoralis</i>, Jarrah, Sheoak, and Snottygobble, which are foraging species for Carnaby Cockatoos and Forest red-tailed cockatoos, which roost nearby in lot 47 Brae Road and Bluebell Court along Poison Gully Creek. There may also be other roosting sites nearby of which I am not aware. These vegetated bridle paths travelling through Brae to Brand Roads should remain as wildlife corridors. The 're-purposing' of the bridle paths for cyclists and pedestrians is not necessarily in the best interests of the flora and fauna of the area. As a matter of interest, some years ago, possibly the year 2000, a few local residents attended a meeting convened by John Nicholson our environmental officer at the time. The Mayor was present. Some residents wanted to buy the bridle paths and add them to their properties, others wanted to save that area from being cleared because of the rare flora there. That was an impromptu meeting but would be on record. They were informed then of the future plan for the area in twenty years' time which included making roads out of the bridle paths.</p> <p>8. Cycle and Pedestrian Paths. Another cause for concern to me regarding Poison Gully is the 'potential enhanced environment of Poison Gully.' I am totally in favour of the ethos of having a 'family oriented natural vibe, to celebrate creeks and streams, recreation and bushland living in design, and to provide sporting facilities and open green spaces that are lacking in the area'. Kalamunda town once fitted into this category. Sadly it is no longer 'A Home in the Forest.' One would hope in the future, High Wycombe will not suffer the same fate as Kalamunda which has lost its village family atmosphere. In theory most of the plan sounds good. However, creating cycle and pedestrian paths along the creek with the expected increased population seems to be not celebrating the natural creek and its environs. The buffer zone would have to be very wide. To create paths would mean use of heavy machinery, more clearing of bushland, curbing and if</p>	<p>8. Noted, this matter will be taken into consideration when details regarding pedestrian and cycling paths are developed at subsequent phases of the subdivision and development process. These details will become available at the detailed design phase and implementation of the public open space areas.</p> <p>9. It is noted that there are a number of fauna present at the site and that the relocation of fauna should be considered if habitat is being impacted. The intent is to minimise the impact on fauna by consolidating and retaining to the greatest degree possible, areas of environmental significance.</p> <p>10. It is anticipated that new development adjacent to public open space will have a road interface, rather than residential development directly adjoining. Appropriate setbacks will be considered as part of the private realm design guidelines.</p> <p>11. Noted, this detail will be considered as part of the development of public realm design guidelines and landscape design for the LSP area.</p> <p>12. Noted, this detail will be considered as part of the development of public realm design guidelines and landscape design for the LSP area.</p> <p>13. The LSP area will be serviced by an improved public transport network with the new train station being a key feature. Feeder bus services are proposed to take residents from the surrounding localities through the LSP area down major arterials and to the station. The proposed road network has been designed to cater for increased bus services and will be readily accessible to surrounding residents. The management of the bus routes, their frequency, and any service additions is, however, a matter for the Perth Transport Authority (PTA).</p> <p>14. The provision of aged care development remains a high priority for the City. Given there are several locations within the LSP area that would be suitable for aged care, this it has not been specifically identified on the LSP. The residential classification on the LSP will enable consideration of aged care development in the future. The City will continue to advocate and encourage aged care providers to develop integrated aged care. The TOD precinct also provides an opportunity for specific sites for aged care to be identified.</p> <p>15. The traffic modelling undertaken by KCTT indicated a distribution of traffic to the surrounding road network. Berkshire Road is already identified as a key connection to the LSP area. Maida Vale Road is currently identified for upgrades. Upgrades and widening will need to be considered in the context of demand generated by development within the LSP as it progressively occurs. Future road design will have regard to the existing residential properties and endeavour to minimise any impacts where possible.</p>
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	<p>you take into consideration the extra number of adults, children, cats and dogs and amount of rubbish, access for trail and quad bikes which are already a nuisance, the impact on the creekline could be disastrous. There is already unsociable behaviour in the accessible areas of Poison Gully where vandalism, needles, alcohol bottles and smoking paraphernalia have been frequently found, so I feel the area could become very misused. This needs more discussion and thinking through. I believe cycle and pedestrian ways should be incorporated with new roads for ease of access to all the amenities, but I must draw to your attention another potential environmental threat which I outline below.</p> <ol style="list-style-type: none"> 9. Rainbow Bee Eaters. The Rainbow Bee eater is prevalent in the area, migrating down south in spring, and heading back up north in late Autumn. They are often seen perching on electric wires in the area. A few years ago, there was a colony of burrows where the Bee eaters used to nest each year. A few residents thought we should fence the area or ask the shire of Kalamunda to erect a sign warning people to stay away but we decided it might have the opposite effect. Unfortunately for the birds, a truck driver unwittingly parked his 30 wheeled bogey right on top of the warren and wiped out the whole colony in an instant. However, there is still a small group of them in the area. Sylvia Netherway and I were fortunate to witness them at Poison Gully in Littlefield Road, initially only one or two calling out to each other and within half an hour, forming a group before flying up north together. I draw this to your attention so verges that may contain tunnels should be checked carefully before any power, water, sewerage services, or road works are carried out so the tunnels would be preserved. Their habitat is being destroyed and we need to ensure they have an open sandy place to breed. 10. I could write a novel on all the points I would like to cover with regard to saving bushland which is earmarked as public open space. Buffer zones for instance. One house in particular, (number 12 Milner Road), was allowed to be built so close to the creekline, the fence subsided down the embankment. I could also write about the lack of privacy for residents when 3-4 storey dwellings are built and the effects of their encroachment so close to an environmental area but will leave that for others who will have already written about this. 11. I would like to make a few suggestions that may fit into the designs of the family park or be incorporated in the Recreation/sports area. With the onslaught of hundreds more children who will have little or no backyards to build cubbies, play cricket or climb trees, they should have an outlet for their energy and imagination. In a large nutshell, these suggestions are for all ages: A running track, cricket pitch, outdoor basketball court to be accessible to everyone at no cost, plenty of lighting, a park for all the family (along the lines of Mills Park in Brixton Street in Beckenham), shaded seating and BBQ areas, shade trees suitable for climbing and outdoor fitness equipment, dog exercise park and a skateboard ramp. May I dare to suggest a Children's forest be established along the lines of the one in Whiteman Park? Perhaps a visit to these areas and to the Rio Tinto Nature scape in Kings Park would be inspirational to the designers. A long-term approach is needed for future generations. 12. Street planting. I would not like to see trees such as Jacarandas, beautiful as they may be, planted in the new area or Ficus hillii, Ornamental pears, Plumbago, Box trees or Olives which have been planted over the years in the existing part of High Wycombe. Rather there should be a mix of local native bird attracting shrubs such as Grevilleas, Callistemons, etc, to create extra corridors for the birds. 13. Shuttle Bus. A free shuttle bus, such as the one in Midland, which would run half hourly from the shopping centre on Kalamunda Road through Newburn Road, around all the new streets to the Railway Station and back again. 14. Has anyone considered making provision for an aged care facility? It shouldn't be expected that all the new population will be young. The new town should cater for all ages. 15. Maida Vale Road and Milner Road. A dual carriage way is proposed along Maida Vale Road and Milner Road which also, according to figure 34 of the plan, includes a footpath and cycle path. 	
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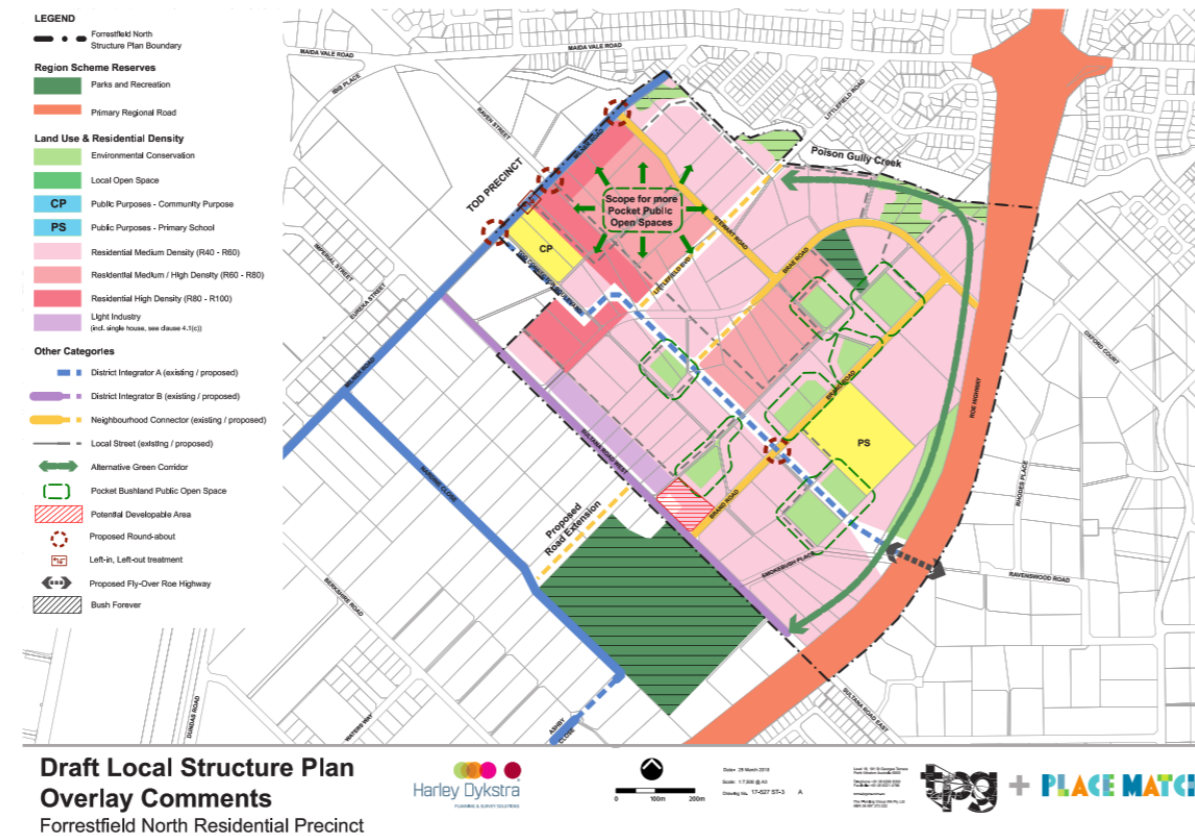
		<p>That picture doesn't seem accurate as it makes it appear that the space available is very wide. As the services are on the south side, two extra lanes would mean resuming the footpaths and verges on the north side, which would encroach close to the residents' boundaries and prevent visitor parking. One section of Milner Road is very narrow near Maida Vale Road. I can't think how a dual carriage way could be implemented as there is little space for widening. The section of Poison Gully Creek over the bridge on the west side of Milner Road has been regenerated by a Friends' Group and is not listed as Bush Forever (it should be) but is important to the area. Building a dual carriage way on these roads would have a negative effect on the quality of life of the residents, of which I am one. No one wants to live on a very busy, noisy main road where there is heavy traffic and no visitor parking. The road is busy enough as it is (see photo below). It seems ludicrous to me, on one hand, to build a new section of town that will enhance the lifestyle of the residents while negatively affecting the lifestyle of other citizens living in the area. It would be more feasible to make Berkshire Road into the dual carriage way as it leads from Roe Highway to Dundas Road through an industrial area where no residents would be affected. Please take this suggestion into consideration.</p>	
<p>9.</p>	<p>A7171</p>	<p>Objection and comments</p> <ol style="list-style-type: none"> 1. Extent of Local Open Space. The Draft LSP shows over half of the Lot 79 as Local Open Space (LOS). As Shown on the attached plan B, the proposed boundary of the LOS will run through the home. It will also mean the existing substantial outbuilding will be included in the LOS. Lot 79 does not contain any significant vegetation. This is illustrated in Figures 12, 13, 14 & 15 in the Draft LSP. Figure 11 shows that neither of the potential environmental linkages involve Lot 79. This provides a considerable degree of flexibility in the design of the LOS. The Draft LSP seeks to promote a green link between the Bush Forever site on Sultana Road West and Poison Gully Creek (2.7.1.1). The way this has been achieved on Plan 1 in the LSP shows it going through the western part of Lot 79, adjoining the neighbouring Bush Forever Site. This can still be achieved without the need to remove the house on Lot 79. Do not object to having LOS on the property, but object most strenuously to placement of the LOS in such a manner that it will result in the demolition of their home. Respectfully request that the extent of the LOS on Lot 79 Brae Road, High Wycombe be modified to enable the retention of the existing dwelling as the attached Plan A. 	<ol style="list-style-type: none"> 1. Given the Local Structure Plan (LSP) is a planning instrument that coordinates and facilitates future development and subdivision, the location of existing dwellings was considered a key constraint when proposing the boundaries of the land use classifications. The local open space (LOS) has been designed in a way to provide an appropriate interface with the conservation and Bush Forever lot to the north-east. The shape and configuration of the local open space boundary and the road alignment on Lot 79 has been reconsidered as a result of this submission and the relocation of the road and associated boundary of the local open space is reasonable and, as a result, the LSP has been modified to avoid the house. 2. Noted, see 1 above. 3. Noted, see 1 above. 4. The staging plan is indicative only and does not necessarily require the portion of local open space (LOS) on the subject site to be developed with stage 1b. The City may only acquire land through the future Development Contribution Plan (DCP) when funds are available and the demand for that infrastructure has arisen. Pre-funding the acquisition of local open space is a detailed consideration for the Council and regard needs to be given to the need and priority of the local open space as the area develops. 5. Land that is identified as LOS is proposed to be purchased through the future DCP that will support infrastructure delivery within the project area. DCPs are administered by the City under provisions of the City's Local Planning Scheme No. 3. DCPs facilitate the contribution of funds from the development and subdivision of land in the area to undertake land acquisitions and fund public infrastructure that service the broader project area. As development progressively occurs, funds are raised through the DCP. The schedule of items requiring purchase and timing of acquisition or delivery is dependent on the take up of development, infrastructure demands and availability of funds within the DCP. Specific infrastructure items and cost apportionment is a key consideration as part of the preparation of the future DCP for the area. 6. Further to response 1 above, where dwellings are not impacted by future subdivision, there may be opportunities for landowners to retain dwellings and stage subdivision/development.

	<p>2. Dwellings as a Site Constraint Section 2.7.1.1 of the Draft LSP lists the site constraints that were considered in the preparation of the document. Whilst various matters have been taken into account, e.g. significant environmental areas, bushfire management, drainage catchments etc. existing homes have not been considered. This appears to be intentional as if to provide a "clean sheet" starting point. There are, however, numerous site constraints as described in 2.7.1.1 that mean a "clean sheet" is not available. By ignoring the fact that many of the homes within the LSP are substantial and their demolition will have a major financial negative impact on the property owners, the Draft LSP places no value on the dwellings. This is a significant concern to our clients, who, along with other landowners within the LSP, Council are purportedly seeking to encourage to develop their land. In section 2.7.4 the LSP explains that the future land assembly was a key focus of the preparation of the LSP. The aim is to provide "...a wider range of future development options for existing landowners...", rather than relying on typical estate developers. Unfortunately, the loss of a home in a subdivision process makes it very difficult for non-typical estate developers to access funds to do the subdivision, especially when their home is to be demolished effectively making their asset against which borrowed funds are measured a vacant parcel of land and losing potentially hundreds of thousands of dollars in equity.</p> <p>3. Roads. The Draft LSP identifies a road network. This includes Local Streets. There is a Local Street shown on Lot 79. It runs alongside the proposed LOS. From a bushfire safety and accessibility perspective this is a sound and common Planning principal. The owners of Lot 79 have no objection to this except that if implemented on the proposed alignment it would also result in the demolition of their home. However, if the Draft LSP is modified as requested above (and shown on Plan A) this would be resolved with no loss to the broader community, and without prejudicing the integrity or intent of the LSP.</p> <p>4. Staging Section 2.7.11 discusses how the staging of development will occur. Lot 79 is located in the northern portion of Stage 1A. The LOS portion of Lot 79, however, is located in the northern portion of Stage 1B (Figure 41), which is proposed to be developed later than Stage 1A. If/when the owners of Lot 79 choose to subdivide their property (within Stage 1A) the LOS portion will need to be excised. This would leave the owners of Lot 79 either:</p> <ul style="list-style-type: none"> a) As custodians of land they can't develop or utilize in any way on behalf of the broader community/Council if the LOS is not transferred to the Crown at the time of subdivision; or b) Waiting for payment for the land they have ceded to the Crown (in excess of their standard 10% contribution) for an unknown period that may extend to years if the land is transferred to the Crown at the time of subdivision. <p>Neither of these scenarios is a reasonable or acceptable outcome. Regardless, it would be practical and logical to include the whole of the property within one development stage rather than splitting it over two. Request that Staging boundary be modified to include the whole of Lot 79 Brae Road, High Wycombe in Stage 1A.</p> <p>5. Local Open Space Acquisition. Under normal subdivision circumstances, the amount of land in that LOS in excess of the standard 10% POS contribution (given up for free) would be purchased by the Local Government. We appreciate that the yet to be prepared Developer Contribution Plan (DCP) will enable the acquisition of the LOS (2.7.12) but having the LOS in a separate stage implies that payment for that land will not be received until the later stage 1B is developed. Table 4 of the LSP states that the LOS will be acquired by the City, but we are not sure whether this will be achieved through this usual process or purchased using funds generated through the Developer Contribution Plan as indicated in section 2.7.12. The term "acquire" simply means "gain possession of" (Oxford dictionary). Clarity on the mechanism of acquisition would be helpful.</p>	<p>7. Noted, see 1 above.</p>
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<p>10.</p>	<p>A8006</p>	<p>Objection and Comments</p> <ol style="list-style-type: none"> Property has been zoned Community Purpose in the recent draft Local Structure Plan. Has followed the progress of this proposed development since the first public meetings and was very clearly given the impression that property was to be rezoned as high-density housing. Prior to this and in the time since owning the property, have been told (in writing from the Shire) that property's zoning was changing from special rural to industrial, special rural to urban, and now Community Purpose. Not a single definable decision has been made in all that time. Residents affected by this change have never been consulted on these proposed changes, yes, they have been informed but never consulted. What this has effectively meant is that they have had the power of control over their asset removed and put into limbo by this indecision, by the simple fact that the properties remain largely unsalable due to a lack of confidence in the proposed zoning in the last 10 years. Imagine if any of the people working in local government had this control over their home removed without any say in the matter. By lack of control I mean the inability to relocate for employment or education and the chance to upsize or downsize according to financial or personal situations such as retirement, unemployment or illness and so on. The City of Kalamunda introduced the land owners to Nigel Satterley who proposed an offering of \$750 000 per title, which on average is \$75/m² of land and was quite clearly an insult when the PTA has paid over \$320/ m² for the land near the train station. Have met with Chris Lodge and Mitchell Brooks from your Planning Department and was given the impression the shire views this project with a 10 to 15-year timeline with the area which initially was to be the initial development zone closest to the train station now thought to be the final development zone due to infrastructure such as sewerage being unavailable and debate over who will pay for its installation creating even further delays. This means the landowners are still left the victims of indecision for a very long time. I have no objections to the development taking place, I can see that it is beneficial to most stakeholders except the landowners most directly impacted by something they have no control 	<ol style="list-style-type: none"> Noted. The change in the planning framework for the area followed the decision in 2014 by the State Government where it confirmed the Forrestfield-Airport Link project, inclusive of a new rail line to Perth Airport and a train station in Forrestfield North near High Wycombe. With the proposed development of a new rail line and train station, the City and key State Government Agencies including the Western Australian Planning Commission (WAPC) identified the need to redefine the potential land uses surrounding the future station, focussing on mixed use development incorporating retail, commercial and higher density residential. The City of Kalamunda undertook public consultation on what landowners and community members thought was important for the Local Structure Plans(LSP) in 2017. This process has informed the draft LSP. The District Structure Plan (DSP) that was adopted in 2016 identified the property as high density residential. The DSP did not allocate community purpose or public open space, this is the function of the LSP. Therefore the dedication of community purpose is consistent with the DSP's high density residential as this is an accepted use within a high density residential area. The City doesn't have an opinion on land value. When purchasing land the City engages an independent land valuer to determine the value of land. Land purchased by developers is determined through market forces and direct negotiation outside of any involvement with the City. Funding of key infrastructure into new urban areas is a key consideration. The timeframe for the delivery of certain items of infrastructure is dependent on the establishment and details within a future Development Contribution Plan (DCP) which requires funds to be

		<p>over. Your letter regarding my property outlines that it will be used for Community Purpose and as such will eventually be owned by the City of Kalamunda. I put forward that the City of Kalamunda has effectively removed me from having an open and fair market in which to sell my property in the future by restricting its ownership to the City of Kalamunda and that compensation for such loss should be duly considered as part of this process as part of a fair market value assessment of my property along with a reasonable expectation of when a purchase is likely to occur.</p> <p>6. We are currently being personally and financially disadvantaged by the lengthy delays in this planning process as we are unable to make any significant plans in our lives due to being trapped by our inability to market our home, and (with regard to other landowners facing similar restrictions to their lives) feel that this needs to become a priority in your considerations with regard to this development.</p>	<p>collected as development occurs. The delivery of development is dependent on market forces outside of the City's control.</p> <p>5. Land that is identified as Community Purpose is anticipated to be purchased through a future DCP that will support infrastructure delivery within the project area. DCPs are administered by the City under provisions of the City's Local Planning Scheme No. 3. DCPs facilitate the contribution of funds from the development and subdivision of land in the area to undertake land acquisitions and fund public infrastructure that service the broader project area. As development progressively occurs, funds are raised through the DCP. The schedule of items requiring purchase, apportionment and timing of acquisition or delivery is dependent on the take up of development, infrastructure demands and availability of funds within the DCP. Council may consider pre-funding certain infrastructure item but this will be subject to a separate process and detailed consideration by Council.</p> <p>6. Noted.</p>
<p>11.</p>	<p>Planning consultant on behalf of A7220</p>	<p>Objection and Comments</p> <ol style="list-style-type: none"> 1. The City of Kalamunda has initiated the Forrestfield North Residential Precinct Local Structure Plan, a structure plan which seeks to provide a higher density residential precinct in proximity to the future Forrestfield Train Station. This Structure Plan would be rolled out in conjunction with the Forrestfield Station Transit Oriented Development (TOD) Precinct and the Forrestfield North Activity Centre Precinct. In response, Harley Dykstra would like to make a submission, on behalf of our client, who objects to the Forrestfield North Local Structure Plan, and urges the City of Kalamunda to amend its design to allow for a more equitable, sensible and practical distribution of developable land relative to non-developable land (e.g. drainage and public open space). 2. Client is acting on behalf of his father who is the landowner of Lot 34 Brand Road and has been actively involved with the various planning initiatives affecting the High Wycombe precinct over the past 15 or so years. The land affected by this Structure Plan had previously been heavily investigated and nearing delivery as Stages 2 and 3 of the Forrestfield Industrial Area. The announcement by the State Government in 2014 confirming the commitment to the Forrestfield Train Station as part of the Metronet package demanded an overhaul of previous planning instruments in lieu of more efficient and complimentary, residential land uses to support the future train station. 3. Clients father has owned and resided on the subject site for over 35 years. He had anticipated that the sale of this land would fund his assisted living options, if and when he required. The new draft Forrestfield North Local Structure Plan has designated his land as predominantly public open space, almost entirely containing a possible drainage basin. Clients Father is now 93 years of age and suffers various conditions that make him particularly susceptible to the uncertainty over his land of which this Structure Plan proposes. 4. In our client's own words: "the uncertainty regarding the future of our father's land causes a total lack of flexibility to respond to the landowners situation, to be able to sell at the appropriate time and value, which is grossly unfair and outrageous". It is on this basis that, on behalf of our client, we wish to lodge a formal objection to the Forrestfield North Residential Precinct Local Structure Plan. 5. Public Open Space Distribution. The proposed Structure Plan indicates a specific emphasis on achieving a vegetated link between the existing Bush Forever Site No. 123 on Sultana Road West and Poison Gully Creek. This over focus has resulted in a large number of landowners within the precinct being unfairly burdened with undevelopable public open space land for an indefinite period of time, particularly in the absence of a Development Contribution Plan and a clear staging plan with indicative timeframes. Additionally, it results in a large 'urban' portion of the precinct not benefiting from an equitable share of public open space, which could otherwise 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted. 5. This concept was considered, however there is not a logical distribution of environmental value for the full length of the boundary of the LSP area along Roe Highway, which would justify consolidation of conservation areas in this location. The 'green link' as proposed is considered to represent an appropriate corridor of parkland and conservation to maximise amenity and co-locate POS with ecological values. 6. With a view of designing the movement network to separate traffic associated with the Forrestfield / High Wycombe Industrial Area and the Residential precinct, the cul-de-sac is considered a sound treatment. The fly-over connection to the Maida Vale south locality is considered a long-term proposal and is predicated on the traffic volumes expected for the full development of the Local Structure Plan (LSP) area and Maida Vale South. It is also noted under the Sub Regional Planning Framework that the area east of Roe Highway is designated as Urban Expansion and is expected to be developed in the future. The modified LSP includes a proposed local street connecting Sultana Road West and the Transit Oriented Development (TOD) Connector Boulevard which would address concerns raised concerning State Planning Policy 3.7. 7. The drainage basin has been identified on this lot as preliminary modelling indicates that one is required in this general area to contain drainage from the subject area. 8. The Development Contribution Plan (DCP) will be advertised once it has been prepared. The DCP requires certainty with regard to infrastructure items and the broader planning framework for the area. As the Local Structure Plan is not adopted, the DCP does not have definitive infrastructure items to enable the preparation of cost estimates. The DCP for the Local Structure Plan will also require input from the Transit Oriented Development Precinct for infrastructure, development yield and cost apportionment purposes. It is not unusual for a DCP to be progressed post-advertising of the Local Structure Plan. This allows for

have been provided as strategically located POS areas dispersed through the residential area. The presence of an uninterrupted vegetated link in an urban setting is not realistic or practical, particularly when the long-established Sultana Road link is proposed to be closed-off, while establishing another more significant road connection that would traverse the 'green corridor' in any event. The proposed 'green corridor' will also significantly impact the fire risk for the future adjoining residential land. This submission suggests an alternative green corridor adjacent to Roe Highway. This arrangement provides opportunity for a more equitable and logical distribution of public open space between landowners and attains a green corridor without the closure of roads and provides a visual and acoustic buffer between Roe Highway and the future residential area. The attached plan (see below) demonstrates how this green corridor would achieve the same objectives, while representing a more equitable share among landowners (i.e. not sterilising entire landholdings). Additional areas of public open space, in the forms of pocket parks and a greater foreshore reserve near the creek, could then be provided throughout the structure plan area to equally disperse access and proximity to green space for all future residents.



6. Road Connections. The proposed Structure Plan indicates the closure of the established neighbourhood distributor Sultana Road West, in effort to separate the flow of traffic from the adjacent industrial area. Our client strongly opposes the closure of Sultana Road West, and any other road closures that result in a cul-de-sac arrangement. Our review of this arrangement indicates that Sultana Road West is a much stronger and more direct route from the area east of Roe Highway to the proposed Forreestfield Station precinct. The Ravenswood Road fly-over is a poor connection to the eastern locality, unless that precinct is subject to redevelopment which results in a stronger connection. Notwithstanding the final preferred location of a Roe Highway flyover, Sultana Road West ought to remain open to provide good road connections for this locality. In directing the industrial traffic away from the proposed residential precinct, our evaluation is that additional road connections to the Forreestfield/High Wycombe Stage 1 Industrial Area would be a beneficial outcome. A southern road connection from Sultana Road West through to Nardine Close, adjacent the existing Bush Forever Site (No. 123), had been

a degree of certainty to be reached within the planning framework and avoids re-working key elements of the DCP to account for changes that may be made post public advertising.

- 9. Noted.
- 10. Noted.

	<p>considered during the preparation of the Forrestfield North District Structure Plan. This outcome would remove the need for a cul-de-sac as proposed on Sultana Road West and increases the legibility of the overall locality. It is worth noting that the proposed Sultana Road cul-de-sac would exceed 200m in length, which is non-compliant with Element 3 of the Guidelines for SPP 3.7 – Planning in Bushfire Prone Areas. This is a particular concern for an area considered to be a DFES bushfire prone area. Logically, this suggested connection assists in directing traffic to Berkshire Road (which is a direct and recently refurbished link to Roe Highway) and away from the proposed residential area. It would also provide a 'hard edge' along the existing Bush Forever area and increase the separation distance from the bushfire hazard that the vegetation currently poses.</p> <p>7. Drainage. The Post Development Catchment Plan by Groundwork Consulting Engineers (Appendix 4 of the Structure Plan Explanatory Report) shows Lot 34 Brand Road as accommodating Drainage Node AS3, which includes a bio retention area (1,766m²), an underground tank (4,800m³) and a vegetated basin (3,406m³) accommodated on site which leaves little developable area on the subject lot. Our review of the overall Structure Plan demonstrates that there are numerous alternative drainage configurations which could be developed within the precinct. When developers and their engineers review the drainage concepts at the time of subdivision, it is highly likely that other drainage options will be contemplated and designed to reflect the feasibility and best practice at that future point in time. A future developer could easily design an alternative drainage solution, whereby our client's land is not required for drainage, and the developer may have sound reasons for doing so. We therefore find that nominating land as being reserved for drainage at the Structure Plan stage removes the flexibility of future land developers and completely sterilises landholdings unnecessarily. We propose that our clients land not be allocated for drainage, but for development, and that future drainage requirements be noted on the structure plan.</p> <p>8. Development Contribution Plan. The absence of a Development Contribution Plan (DCP) makes any Structure Plan impossible to consider and support. In this instance, there are at least 15 landowners whose entire landholdings are reserved for public open space, drainage and/or roads. These landowners are particularly disadvantaged in the face of the uncertainty these proposed reservations prescribe in the absence of the DCP; and who are unable to develop or sell their properties in the undefined interim. Whilst for anyone the prospect of being unable to sell your largest asset would be disturbing, this is further magnified for our client in his particular circumstance. Our review of the Structure Plan indicates that there is no reason a draft DCP couldn't be prepared solely for this Structure Plan area, and advertised concurrently with the Structure Plan. The adjacent development areas (TOD Precinct and Activity Centre Precinct) are in the early stages of structure planning and can be subject to a separate contribution plan. Our client strongly opposes this Structure Plan in the absence of any formal contribution arrangements and would urge the City to readvertise an amended Forrestfield North Local Structure Plan together with a Development Contribution Plan.</p> <p>9. Conclusion. This submission has identified some broader urban design and equity inadequacies that have been observed during the review of this Structure Plan. For a large number of landowners, there is a high degree of uncertainty proposed with the complete sterilisation of their land, with no acquisition mechanism, time-frame or valuation principle. We believe that there are alternative solutions which could provide a more equitable and improved planning outcome, some of which have been discussed within this submission. It is on this basis, and the absence of a Development Contribution Plan, that our client strongly opposes the Forrestfield North Local Structure Plan.</p> <p>10. We suggest the City of Kalamunda review the submissions of those landowners affected by land sterilisation as a priority. Further, we urge the City of Kalamunda to seriously consider the various design aspects raised in this submission. It is our preference that the City readvertises an amended structure plan design concurrently with a draft Development Contribution Scheme. We would appreciate the opportunity to meet with the City's strategic planning staff to further</p>	
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		discuss the content of this submission. It would be appreciated if you could contact the undersigned or Henry Dykstra on 9495 1947 to make the necessary meeting arrangements.	
12.	A27288	<p>Objection and Comments</p> <p>1. My wife and I understand the development goals the City of Kalamunda is trying to achieve for the Forrestfield North area and as such we are supportive of the rezoning of our particular hectare of land to medium-high density residential (R60 - R80). We have also been in discussions with all other land owners in Cell 6, and as I understand it, we all share a similar view. As such we are willing to work with Developers and other Residents to expedite the planning and development of Forrestfield North which we sincerely hope is urgently progressed.</p> <p>2. In September 2004 we were first advised via the Kewdale-Hazelmere Region Integrated Master Plan, that the area in which we live was to be re-zoned. Since then there has been a constant change of plans and ideas which has had a detrimental effect, not only to our lives and health, but to many others living in this area. For 14 YEARS we have been subjected to a life in limbo which is totally unacceptable. The entire project needs to be expedited and finalised, to the satisfaction of all landowners affected.</p> <p>3. Our first concern is that a large majority of the public open space and vegetation retention area is entirely along the Brand Road side of the development, with limited open space throughout the rest of the proposed development. This seems very unfair in the sense that this is paid for by the DCP for the entire development but in reality, is really only accessible to residents living close to Brand Road. Our belief is that this is creating a very unpleasant "concrete jungle ghetto" on the Milner Road edge of the proposed development.</p> <p>4. The proposed primary school is surrounded by public open space and vegetation retention areas with no close residential which would enable the creation of safe houses. This is a major concern.</p> <p>5. We are strongly of the view that NO funds from the Forrestfield North DCP should be allocated for the construction of the bridge over the Roe Highway, as this bridge is for the benefit of people living in Maida Vale/Forrestfield to enable them easy access to the train station. The bridge has little to no relevance to people living in Forrestfield North.</p> <p>6. The construction of the main Boulevard connecting the bridge over Roe Highway to the train station should be jointly funded by Forrestfield North and the future Maida Vale development. This is because Maida Vale/Forrestfield residents will be the major users of this through road.</p> <p>7. The development of Forrestfield North residential zone should proceed in its own right, and not be tied to the completion of the planning of the TOD zone.</p>	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. The location of Local Open Space (LOS) is designed to facilitate spaces for people to recreate and to encourage conservation and biodiversity. The three main areas of LOS, being the 'Green Link', 'Educational and Sports Space precinct' and the Centralised 'town park'. The LOS is considered to be distributed to the greatest extent possible, having considered environmental values and the future community need. 4. The street and public open space network, subdivision and development of the Local Structure Plan (LSP) area will, through appropriate design guidelines, address Crime Prevention Through Environmental Design (CPTED) principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design. 5. The Development Contribution Plan (DCP) cannot be finalised until the Residential Precinct is progressed to provide a level of certainty for infrastructure items. The Transit Oriented Development (TOD) Precinct is also required to be progressed to a level of certainty to provide sufficient information to inform infrastructure requirements and provide details in relation to cost apportionment. Therefore, the details of the infrastructure items will not be formalised until this has occurred. The modified LSP has designated the flyover and a portion of the TOD Connector Boulevard as Potential/Future, which means it is a potential consideration and may not necessarily be included in the DCP. The DCP is subject to a separate preparation process and will be the subject of an advertising process similar to the LSP. 6. The DCP cannot be commenced until the Residential Precinct is progressed to provide a level of certainty in relation to infrastructure and the TOD Precinct is also commenced to inform specific development and infrastructure requirements. The details of the infrastructure items will not be formalised until this has occurred and the DCP has been prepared. 7. The planning for the Residential Precinct LSP will proceed separately to the TOD Precinct. However, the DCP requires both the Residential Precinct and TOD Precinct to be progressed with a level of certainty to provide infrastructure and development information to enable the preparation of the DCP. There are significant infrastructure items which will be considered shared costs across the two precincts which require both plans to be progressed to enable establishment of the DCP.
13.	A27701	<p>Comments and Objections</p> <p>1. My submission addresses the uses for the Composite Light Industrial land for my property at 129 Sultana Road West, High Wycombe in particular but also the group of six (6) properties in this category.</p> <p>2. Request: Can Council please adopt subdivision as an optional use for the six (6) properties in the strip of land along Sultana Road West. Subdivision approval achieves the objective of a buffer in a more effective way than with an industry on the block</p> <p>3. WIDENING OF SULTANA ROAD WEST I understand the new road reserve will take about 9.6 ~ 10 metres of land from the southern boundary on each of the 6 properties.</p>	<ol style="list-style-type: none"> 1. Noted. 2. The modified Local Structure Plan (LSP) has removed the Composite Industrial land use and replaced it with Residential Medium / High Density. 3. Sultana Road West has an existing road reservation width of 20 metres. The Traffic Impact Assessment in Volume 2 of the LPS states that Sultana Road West has a proposed road reservation width of 25m. The widening is proposed on the north side of Sultana Road West. 4. The modified LSP has removed the Composite Industrial land use and replaced it with Residential Medium / High Density.

		<p>4. NORTHERN BOUNDARY OF THE MY "COMPOSITE BUFFER ZONE" BLOCK The proposal for the North boundary, I understand, is for a 5-metre separation from the edge of the subdivision road reserve to my house. Any smaller gap amplifies problems, and increases the risk of demolition, if the property is not already in the demolition zone. If not in the demolition zone, the construction of protective measures like a wall and locked gates will be necessary. I will seek compensation from Council if my house has to be demolished. Council has reasonable alternatives and time prior to the LSP being signed off by WAPC to propose, consult and reach agreement. Safety, adequate separation from house to road reserve, security and noise are some of the issues Council will be asked to address and provide adequate remedies for.</p> <p>5. Surveyor's Pegs Council expect to publish the Final LSP in about November 2018. Could Council have two (2) surveyor's pegs put in place at my property within one (1) month of the Final LSP being published. The first peg will establish the edge of the road reserve on the Northern boundary. The second peg will establish the farthest point from my house where the protective wall is permitted to be constructed.</p> <p>6. COMPOSITE BUFFER ZONE The term Composite Light Industrial isn't mentioned on the State Planning website to my knowledge. The purpose of properties along this strip of land is to establish a transition and buffer from Industry to Housing. In other words, make sure people in the new residential area can't see or hear anything going on, on the south side of Sultana Road West. This is why I recommend a name that defines the purpose of the block – these properties should be named Composite Buffer Zone in the Final LSP.</p> <p>7. SUBDIVIDE The option for landowners to split the six (6) blocks into two (2) equal areas gives additional opportunities in the Composite Buffer Zone. It is essential given the random locations of the existing houses on the 6 blocks. Subdivision achieves the purpose of being a buffer between the Residential area and the Stage 1 Industrial model via</p> <ul style="list-style-type: none"> • the depth of the block. • industries along Sultana Road West are mostly warehouse or office based activities • business hours are 7am or 8am start and finish around 5pm or 6pm • visual effects for people in new residential housing can be reduced by a solid 1.8m wall at both ends and, over time, growing bushy trees. <p>There are few industries that</p> <ul style="list-style-type: none"> • suit the small areas available (~1,350m2 including setbacks, etc) • meet the restrictions KSC place on the type of industries and • suit the location of this block in the LSP. <p>My view is the option to subdivide our blocks into to two (2) equal areas with a house on each block increases the likelihood of an effective and visually pleasing buffer zone. Housing design criteria re noise are similar to housing in other parts of the FNP.</p>	<p>5. Detailed designs are required to determine the future road reservation. This will not occur during the preparation of the LSP. This matter may be progressed by the landowner as part of their potential subdivision design.</p> <p>6. The modified LSP has removed the Composite Industrial land use and replaced it with Residential Medium / High Density.</p> <p>7. Noted, see point 6 above.</p>
<p>14.</p>	<p>A7072</p>	<p>Comments and Objection 1. Owner and resident for the past 32 years 2. Not happy with the progress and discussion on the development of the area. 3. Residents don't seem to be involved in the decisions for the area.</p>	<p>1. Noted 2. Noted 3. The City undertook community consultation in June 2017 to help shape the Local Structure Plan (LSP) which included a landowner workshop and a community workshop. During the advertising of the LSP during May-July</p>

		<p>4. Would like to know the land value that the Council has at present and when will the development start, in order to get lives in order instead of waiting on a call from the Kalamunda Council. It is the cause of stress and uncertainty.</p> <p>5. I don't think it is worth having a train line here if you have not got the passengers.</p>	<p>2018 there was 2 information session and 2 community workshops. The City also invited landowners the opportunity to have a one-on-one meeting.</p> <p>4. The City does not have an opinion on land value. The City will engage a land valuer for the purposes of establishing land values under the future Development Contribution Plan (DCP). The DCP will be created once there is certainty around both the Residential Precinct and Transit Oriented Development (TOD) Precinct LSPs.</p> <p>5. The Forrestfield North LSPs plan for development over the long term. The Residential Precinct estimates 3,576 dwellings to be constructed at full development and to have a total population of 8,582. The TOD Precinct will also have a significant population in addition to this figure. It is anticipated that many of these future residents will utilise the train.</p>
15.	A7135	<p>Comments</p> <p>1. No problem with the rezoning of property and are happy with the recommendations for Medium to High Density as the Structure Plan indicates for "Cell 6".</p> <p>2. Willing to work with Developers and other residents to help with the planning process</p> <p>3. Have been in consultation with all other land owners (5) in Cell 6 and understand all share a similar view.</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p>
16.	A7185	<p>Comments and Objection</p> <p>1. Landowners have extensively studied the draft plan of the Forrestfield North Local District Structure Plan.</p> <p>2. Understand the City of Kalamunda have had many restrictions imposed on them by the EPA in preparing the plan, however there seems to have been little consideration given the personal impact the plan has on the land owners. The majority of land owners are at least 60 years of age, as we are, many much older and are wanting or needing to sell their land to move to homes more manageable both on a physical and financial basis. The proposed time frame for this development to be completed has been stated many times by various employees within the Planning Department of the City of Kalamunda to be at least 20 years. This effectively sentences many to owning unsaleable land due to it being zoned, Bush Forever, Public Open Space, Parks and Recreation, Drainage or Environmental Conservation Land. Many landowners, including ourselves, brought their land not only to enjoy the lifestyle but as their superannuation and many made financial decisions when it was announced the land was to be zoned light industrial. Please in their senior years often need to move to a small, manageable home or an aged care facility which needs to be financed by the sale of their home which many landowners are now unable to do in appropriate time.</p> <p>3. The City, State and Federal Government need to find a way to pay landowners whose land will be zoned Bush Forever, Public Open Space, Parks and Recreation, Drainage or Environmental Conservation at a fair price and in a timely manner, so they can live their senior years in comfort, with dignity and not being worried about financing and maintaining a large parcel of land. Surely this is not too much to expect.</p> <p>4. I would like to see the proposed new road at the eastern end of Brand Road and Brae Road named Porter Street. The Porter family have lived here continuously since the early 1970's when the land was virgin bush. The Porter Family has cared for their bush block which will now become public open space if the draft plan is accepted and as such, the new street or a reserve name should honour long term landowners.</p> <p>5. Concerned that the proposed large green belt along Brand Road has the potential to become a larger dumping ground than it already is.</p>	<p>1. Noted</p> <p>2. The City understands the personal circumstances that many landowners have and is working with the relevant departments and agencies to obtain more certainty around the acquisition of conservation land. The City will be aiming to have an adopted Local Structure Plan (LSP) and Development Contribution Plan (DCP) that provides landowners and developers an attractive product that promotes development.</p> <p>3. The City understands the personal circumstances that many landowners have and are working with the relevant departments and agencies to obtain more certainty around the acquisition of conservation land.</p> <p>4. Noted. The naming of the road will be considered at the appropriate time and will depend on whether the City or a developer ends up being responsible for the construction of the road. The Road Names must comply with Landgate's policies and standards and be approved by the Geographic Names Committee.</p> <p>5. This is not a function of the LSP however the City will put in place management practices to help prevent illegal dumping.</p> <p>6. The street and public open space (POS) network, subdivision and development of the LSP area will, through appropriate design guidelines, address Crime Prevention Through Environmental Design (CPTED) principles, which involves facilitating 'natural surveillance' of spaces through development and subdivision design.</p> <p>7. The LSP has been planned to ensure there is sufficient fire separation between the 'green link' and residential properties. Bushfire Management practices will be put in place to ensure the bushfire threat remains low. Developments will be required to provide a Bushfire Attack Level (BAL) Assessment and any structures must be constructed to the BAL rating standard. The Transit Oriented Development (TOD) Precinct will be required to have POS within the LSP. The location of local open space is designed to facilitate spaces for people to recreate and to</p>

		<p>6. Concerns with the green belt being so close to the primary school and sports ground. There is potential for drug dealers and sex offenders to use the green belt for illegal activities involving the children attending the primary school.</p> <p>7. Also concerned with dense housing and a primary school being so close to the green belt if it is set on fire which is not an unusual occurrence. There appears to be an unbalanced amount of green land in one area and very little towards the TOD.</p> <p>8. When this subdivision was to be zoned light industrial, there was a lot less infrastructure to be borne by developers, which of course impacts the amount per square meter a landowner is paid for their land. Since the government announced the new train station and changed the zoning from light industrial to urban, so much more infrastructure has been added and will impact on the amount of money a landowner will receive for their land. How can this in any way be fair for landowners? We did not choose to have the subdivision in the first place, either as light industrial or urban and now find ourselves having to move whether we wish to or not and, in a timeframe, set down by the City, not our own. Why should landowners bear the cost of infrastructure they will never use? Surely roads, sewerage, libraries, schools and parks need to be funded partly or in full from our taxes. When we purchase a new home, the price we will pay will be reflected by the infrastructure in place. We have to pay to leave our homes and we have to pay again when we buy a new home, why should we pay twice? I believe the price per square metre we receive for our land should be similar to the price per square metre in the light industrial area and this will be determined by the amount the City sets down for the Development Contribution Fund. Please make it fair and equitable.</p>	<p>encourage conservation and biodiversity. The three main areas of Local Open Space (LOS), being the 'Green Link', 'Educational and Sports Space precinct' and the Centralised 'town park'. The LOS is considered to be distributed to the greatest extent possible, having considered environmental values and the future community need.</p> <p>8. The City does not have an opinion on land value. The City will engage a land valuer for the purposes of establishing land values within the future Development Contribution Plan (DCP). The DCP will be created once there is certainty around both the Residential Precinct and TOD Precinct LSPs. The DCP will need to be fair and reasonable to facilitate development. The DCP will be prepared in accordance with State Planning Policy 3.6 – Development Contributions for Infrastructure. The price paid by developers for industrial and residential land is determined by market forces and negotiation outside of the City's influence.</p>
<p>17.</p>	<p>A131540/ A7270</p>	<p>Comments</p> <p>1. This submission concerns the City's obligations to the owners as to the public open space credit attaching to lot 15.</p> <p>2. Lot 15 Brand Road is designated "Primary School" on the Forrestfield North Residential Precinct Structure Plan. It is expected that the Education Department will acquire lot 15 from its owners and the owners will seek compensation on a valuation on the basis of highest and best use of Lot 15 being residential land.</p> <p>3. The owners of lot 15 were originally also the owners of the adjacent lot 14 Brand Road or have inherited from them. Lot 14 is designated Public Open Space in the Structure Plan and is intended to be used as a recreation and sporting field for school and community use.</p> <p>4. Lot 14 was transferred by the owners to the City of Kalamunda in 1978 for the nominal consideration of \$1.00. There were several commercial aspects to that transfer, only one of which is presently relevant.</p> <p>5. The relevant aspect relates to the City's promise, before the transfer, that it would recognise the transfer of lot 14 as a credit for any public open space that the owners/developers of lot 15 may later be obliged to cede as a condition of the subdivision or development of lot 15. (see policy measure 5.8: Application of a credit in a development contribution plan; and State Planning Policy 3.6).</p> <p>6. The standard requirement for ceding public open space was 10% of the net developable land.</p> <p>7. Now that lot 15 is designated "Primary School", not residential, the City's promise is to be honoured in the valuation of lot 15 when the time comes for its acquisition by the Education Department. It is to be honoured by paying the owners compensation for residential land disregarding the usual requirement to contribute public open space under any Development Contribution Plan (see item 15 Schedule 1 of Guidelines for Development Contribution in SPP3.6.).</p> <p>8. If the Education Department does not agree compensation on that basis, then the City must honour the promise made as part of the consideration for its acquisition of lot 14.</p> <p>9. The City may elect to directly contribute the additional compensation from its own accumulated resources.</p> <p>10. Alternatively, the City may require other owners in the Structure Plan area to contribute sufficient additional money to cover the additional compensation for payment to the owners of lot</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. Noted.</p> <p>5. Noted.</p> <p>6. Noted.</p> <p>7. This matter is outside the requirements of consideration for the determination of the Local Structure Plan (LSP).</p> <p>8. Noted, see point 7 above.</p> <p>9. Noted, see point 7 above.</p> <p>10. Noted, see point 7 above.</p> <p>11. Noted, see point 7 above.</p> <p>12. If the adopted LSP has the Lot designated as a Primary School, the lot can only be developed for that purpose. If the Department of Education (DoE) decides not to purchase the lot will remain undeveloped until such time DoE or an education entity purchases the lot; or a Structure Plan amendment would be required to change the land use designation for the lot.</p> <p>13. Noted.</p> <p>14. Noted.</p>

		<p>15. The other owners in the precinct might include the Education Department as the principal beneficiary of lot 14. This is justified on the grounds that, had the owners not transferred lot 14, those other owners would have had to pay more or would have enjoyed less open space.</p> <p>11. In any event, the City must make suitable arrangements for the payment.</p> <p>12. Should lot 15 not be acquired by the Education Department, then Lot 15 should be re-designated residential, and the public open space credit should be retained for the benefit of the owners as originally promised.</p> <p>13. In each case, the resolution of the public open space credit may affect other landowners in the precinct.</p> <p>14. The owners otherwise make no comment in relation to the Draft Local Structure Plan or the proposed rezoning of lot 15 Brand Road High Wycombe.</p>	
18.	A153174	<p>Comments</p> <ol style="list-style-type: none"> 1. District Integrator A (TOD Connector) - If the road is made straight it will be less dangerous. 2. Safer because it is further from the school 3. New road position will offer better parking for the school area. 4. Straight road will ensure better traffic flow. 5. This new route will be 5x less damaging to the environment. 6. It will reduce the costs to develop future adjoining roads. 7. More cost efficient being straight. 8. Deep sewerage can be accommodated along this road, to service all new blocks. 9. Would the City of Kalamunda please make deep sewerage in this area a priority, because without it the development of this area will not/cannot, go forward. 10. The amount of money the City of Kalamunda will receive via rates in the future will easily cover what is paid out initially. A very rough calculation is something like \$100,000 per year compared to 12 million? 	<ol style="list-style-type: none"> 1. The road will be designed in accordance with the Australian Standards to ensure all appropriate safety measures are considered. 2. Appropriate traffic management practices will be put in place to ensure a safe environment for traffic and pedestrians near the school. 3. The current concepts provide parking between the school site and the sports precinct which will effectively cater for car parking. 4. The road will be designed in accordance with the Australian Standards to meet the required and future capacity needs. 5. One of the key principles that has influenced the current road alignment is to protect environmental values, in particularly <i>Conospermum undulatum</i> (wavy-leaved smokebush). 6. The most appropriate design principles for the alignment of the road have also been considered in the Local Structure Plan. The costs of the roads are a consideration of the Development Contribution Plan (DCP) and will depend on the final design in accordance with the Australian Standards. 7. Noted, see 6. above. 8. The final alignment of the sewer pipes will be determined by the Water Corporation and incorporated in, and potentially funded through, the DCP. The items within the DCP are yet to be determined. 9. The DCP will prioritise items to promote development. The City will also consider pre-funding items to promote development. 10. Rates are not a planning consideration.
19.	A153142	<p>Comments and Objection</p> <ol style="list-style-type: none"> 1. I am the registered proprietor and occupier of Lot 10 Brand Road, High Wycombe which is a well-established rural living type lot comprising a total area of one (1) hectare; 2. I note from reviewing the Draft Local Structure Plan my property is proposed to be rezoned in due course to allow it to be redeveloped and used for medium density residential purposes at a density ranging from R40 to R60; 3. In addition it is noted two (2) new separate roads are proposed to be constructed through my property as follows: <ol style="list-style-type: none"> a. A Transit Oriented Development (TOD) Connector Boulevard (i.e. District Integrator A) along the land's south-western side boundary to be contained entirely within No 37 including a portion of an associated roundabout at this new road's intersection with Brand Road; and b. A local road along the land's south-eastern rear boundary which will again be contained entirely within No 37 boundaries. 4. Whilst it is acknowledged the need to provide for the coordinated development of the precinct, I do not support the Draft Local Structure Plan in its current form for the following reasons: 5. The impact of the proposed new road network on No 37 is substantial and will have a detrimental impact on its future amenity, character and functionality due to the loss of land, the increased levels of traffic likely to be generated and the limited setbacks to existing dwelling will have to the new road reserve areas; 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted 4. Noted 5. The Local Structure Plan (LSP) is intended to be a long-term plan. The road may not eventuate for a number of years. The detailed design of the road will need to consider the amenity of the surrounding area and have traffic management principles in place to ensure a safe traffic and pedestrian environment. The development of future residential will need to be designed to ensure appropriate setbacks are in place. 6. The preparation of the Development Contribution Plan (DCP) requires that the Residential Precinct, through the LSP, and the Transit Oriented Development (TOD) Precinct to be developed to provide a level of certainty for the establishment of infrastructure needs and cost apportionment principles. 7. It is acknowledged that the TOD Connector Boulevard will impact some vegetation at the bridge landing. This alignment of the road, however, does avoid impacting many other environmental assets. A different alignment would have greater impact on these environmental values. The alignment

		<p>6. The proposed structure plan does not provide sufficient detail regarding future developer contribution arrangements including how those landowners required to give up land to allow for its implementation will be suitably compensated and when. This is a critical consideration and until more details are provided I do not support the plan at this preliminary stage;</p> <p>7. In particular strongly opposed is the proposed alignment of the Transit Oriented Development (TOD) Connector Boulevard (i.e. District Integrator A) given its impact not only on No 37 but the existing large strands of native vegetation from Roe Highway through to Brae Road, some of which has been identified as being of regional significance and home to rare and endangered flora and fauna. The substantial vegetation clearing works required to accommodate this new road appear to be at odds with the environmental protection objectives of the proposed structure plan and the State planning framework more generally;</p> <p>8. The preference would be to see the Transit Oriented District (TOD) Connector Boulevard (i.e. District Integrator A) constructed along Sultana Road West with a bridge over Roe Highway at its eastern end to provide a direct connection to Sultana Road East and the future Maida Vale South Local Structure Plan area. This configuration would help significantly reduce the amount of vegetation clearing works required and will remove large volumes of vehicle traffic through the centre of the structure plan area for the benefit of future residents. Local traffic from the residential precincts within the structure plan area could then be directed to District Integrator A along its suggested Sultana Road West alignment by maintaining the current alignments of Brae and Brand Roads with appropriate upgrades to these feeder roads as required. With some innovative and thoughtful design and interface with any existing and future light industrial and residential development along District Integrator A could be suitably managed without giving rise to any land use or traffic conflicts; and</p> <p>9. Further, to my knowledge, there appears to have been no conversations or forward strategy around the increased Security (policing due to increased awareness of the area), Road noise (already significant with the rail system and airport noise) and Vehicle emissions (with increased traffic – emissions already significant from the Roe Highway and accelerated due to the elevation decrease in the Brand Road, Sultana Road area creating a pocket). If the precinct grows in what is stacking up to be an unorganised fragmented growth period I believe a strategy should be put forward from this point, the lifestyle in this area will be permanently altered.</p>	<p>of the road also allows for a more even distribution of traffic between Maida Vale Road, Berkshire Road and the TOD Boulevard.</p> <p>8. The alignment of the road allows for a more even distribution of traffic between Maida Vale Road, Berkshire Road and the TOD Boulevard. Having the bridge at Sultana Road West/Sultana Road East would affect a significant number of small residential lots along Sultana Road East. It could also entice industrial traffic to use the road. Sultana Road West/East are also less centralised and may not promote a more even distribution of traffic between Berkshire Road, Maida Vale Road and the TOD Boulevard.</p> <p>9. A Noise and Vibration Report has been provided as part of the Appendices for the LSP. During detailed design of roads amenity will need to be considered.</p>
<p>20.</p>	<p>A27206</p>	<p>Comments</p> <p>1. I have property in the planning area and I and many other land owners are very concerned with regards to the availability of services, roads and other development infrastructure that are only going to be put in by developers when they are ready to develop the property and not by the government or the shire to attract developers so as to fast track the process of getting buildings up and people in to use the new rail system.</p> <p>2. I believe the area will be a green fields development that if done properly and infrastructure put in, by the government/ shire and funds recouped when developers start developing the property, it would showcase a great high density living area in a smaller timeline. A good number of owners believe, as I do, that if this is not done then it would be a minimum of 10 years before the rail system is properly utilised. The last thing we want is a white elephant infrastructure project. Most land owners in this area have been left in limbo for the last 10 or more years as the original concept for the area was industrial use.</p> <p>3. I also believe that the area needs to have its own identity with a new suburb name given by consultation with land owners/ rate payers in the shire as it is not part of Forrestfield. I hope that the development area will be a positive outcome for the land owners, shire and the whole community.</p>	<p>1. A future Development Contribution Plan (DCP) may fund infrastructure such as roads, sewer, community facilities and public open space (POS). These infrastructure items will help promote development. The City may also consider prefunding items to promote development but this is a separate process which requires Council's careful consideration having regard for a number of matters including infrastructure priorities and the rate of development.</p> <p>2. The full development of the Local Structure Plan (LSP) is predicted to occur over the long-term, however, the rate of growth will depend on the market conditions. The DCP may fund infrastructure such as roads, sewer, community facilities and POS. These infrastructure items will help promote development. The City may also consider prefunding items to promote development but this is a separate process which requires Council's careful consideration having regard for a number of matters including infrastructure priorities and the rate of development.</p> <p>3. The City is currently running a competition to name the suburb.</p>

<p>21.</p>	<p>A6395</p>	<p>Comments and Objection</p> <p>1. Registered proprietors of 34 Stewart Road, High Wycombe, which we acquired on 20 January 1981. We purchased the property to establish a site for "Hillview Apiaries" and the property has become our family home.</p> <p>2. In its current form, we do not support the proposed LSP. Our objections relate primarily to road planning and design within the LSP area and assumptions made in relation to the land economics that will deliver the LSP. We have provided below further explanation of our objections and some simple suggestions to improve the LSP.</p> <p>3. Land Ownership and Economics – Landowners do not have the incentive to release land for development unless the value of the land for development exceeds the current improved land infrastructure value. As drafted, the LSP contains public open space (POS) and infrastructure items that exceed normal industry standards and will most likely make delivery of the LPS unfeasible. As has been noted by the City, land ownership within the LSP is fragmented across 89 properties. Unfortunately, the LPS design does not have adequate regard for this and will be impediment to the area's development going forward. With the following minor modifications, we believe there will be a greater prospect for the successful delivery of the LSP:</p> <p>a. The LSP should work with existing road alignments (subject to suitable widening and upgrades) as far as practical. <i>The realignment of Brae Road in particular will cut across multiple landholdings and it's likely some landowners will not have the will or incentive to develop.</i></p> <p>b. New roads (especially Littlefield Road south of Stewart Road) are unnecessary to the LSP and will hinder its implementation <i>The existing road network, subject to suitable upgrades and widening, is considered suitable for function of the LSP. The extension of Littlefield Road south of Stewart Road cuts across multiple landholdings and it's likely some landowners will not have the will or incentive to relocate. The Traffic Management Plan (TMP) commissioned for the project anticipates only 1600 Vehicle Movements per Day (VMPD) will occur on Littlefield Road, which could be easily accommodated on other roads if this new road was omitted from the LSP. By dictating the location of new roads it reduces flexibility for individual landowners/groups to plan local roads and proceed with development independently. This is imperative given the fragmented ownership of the area. Notwithstanding the above comments, we acknowledge the need for a new connecting road between the new train station and Forrestfield and recognise this is a fundamental element of the LSP. Funding for the road, and appropriate compensation for landowners, should consider the extent to which the road will meet district level requirements above the need generated by the LSP.</i></p> <p>c. Where new roads are required, their location should have regard to existing cadastral boundaries. <i>As noted above, the proposed alignments of Littlefield and Brae Roads cut across multiple land holdings, which presents a serious impendent to their delivery.</i></p> <p>d. Development cells cut across cadastral boundaries <i>Development cells can be easily modified to have regard to cadastral boundaries. This will present challenges for land assembly and the delivery of a future DCP (to be further discussed)</i></p> <p>4. Littlefield Road Extension – Subject to the comments made above, we acknowledge the need to upgrade and widen existing roads to cater for increases to traffic flows. However, the extension of Littlefield Road to the south of Stewart Road is considered to be an onerous and unnecessary inclusion to the LSP.</p>	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. The Development Contribution Plan (DCP) will be created to be fair and reasonable and to allow development to be undertaken in an equitable manner. The Local Structure Plan (LSP) has been modified to utilise the existing road network and has removed Littlefield Road as a neighbourhood connector road. 4. Roads are required to be included in the LSP and DCP to facilitate development and ensure the area develops appropriately. The LSP has been modified to utilise the existing road network and has removed Littlefield Road as a neighbourhood connector road. 5. Noted. The DCP requires the Residential and Transit Oriented Development (TOD) Precinct LSPs to be planned to a level of certainty. The details of what is included in the DCP will be determined during the commencement and adoption of the DCP. The DCP will be required to be adopted by the Council and will be advertised to the public for comment. 6. Noted.
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	<p>South of Stewart Road, the planned Littlefield Road extension will directly impact our property. We request that the Littlefield Road extension south of Stewart Road be removed from the LSP for the following reasons:</p> <p>a. The proposed width of the road (30 m) is excessive and its construction costs are an unnecessary impost on the LSP. Given the anticipated traffic volumes of 1600 VMPD the proposed road width is double the width recommended by Livable Neighbourhoods, which classifies roads that carry up to 3000 VMPD as an 'Access Street C', which has a recommended width of 15.4 - 16m.</p> <p>b. Land acquisition and construction costs for Littlefield Boulevard are excessive and are a further disincentive to development of the land.</p> <p>c. Extension of the road cuts through multiple properties, and it's highly likely some landowners will not facilitate the road extension due to the lack of financial incentive or simply because they do not want to move. This will be prejudicial to the orderly and proper development of the LSP.</p> <p>d. Given the low anticipated traffic volumes, creation of the road is unnecessary and its presence removes the flexibility for developers to proceed independently at subdivision stage.</p> <p>We acknowledge there are some planning benefits of extending Littlefield road north of Stewart Rd through to Poison Gully and eventually Maida Vale Rd. However given the existing Littlefield Rd reserve north of Poison Gully is only 20m wide (and has limited prospect of being widened due to the location of existing development fronting the road), this connection point will never be suitable for carrying significant volumes of traffic. This is reflected in the TMP, which suggests the road will only accommodate 1600 VMPD.</p> <p>We therefore recommend the following with respect to Littlefield Rd north of Stewart Rd:</p> <ul style="list-style-type: none"> • Reduce the width of Littlefield road to 20 m consistent with its width north of Poison Gully <p>5. Developer Contributions - We acknowledge details of a developer contribution plan (DCP) will be established via a future scheme amendment. However, given critical design elements of the LSP are dependent on DCP funding it's important that realistic parameters for the DCP are established early in the planning process. As we have noted above, there is a risk that if DCP items are not carefully considered the LSP will not be delivered.</p> <p>We do not support the following proposed DCP items:</p> <p>a. Landfill site - Paragraph 40 of the officer report supporting advertising of the LSP states that the Brand Rd landfill site could be gifted as a public open space (POS) contribution and as an offset funding for remediation works could potentially be funded through the DCP. Whilst we support use of the landfill site as a sports precinct, it is our understanding that 17.87 percent POS is being provided and without inclusion of the landfill site, the LSP would still exceed the minimum required 10 percent POS. Given this, and that these facilities are district level facilities, it is not reasonable or appropriate that funding is sourced through the DCP for remediation.</p> <p>b. Section 2.7.12.2 of the LSP text states that three specific lots within the Residential Precinct will need to be acquired because they're fragmented by the proposed road network. We consider this is equally applicable to a number of other lots. Our discussions with the City have indicated the lots would be acquired by negotiation and that this negotiation has not commenced. We also understand from our discussions that Crown land</p>	
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		<p>processes and disposal arrangements have not been considered for sections of road that are not required after realignment. Acquisition of (at least) three lots due to proposed road realignments is considered to be an onerous and unnecessary cost for landowners. Given the fragmented nature of the land and redundant sections of road, contractual arrangements will be complex and unworkable. Given the above, we request that the Littlefield Rd extension (south of Stewart) is removed from the LSP and where possible, greater effort is made to work within existing road alignments (especially Brae Rd).</p> <p>c. Cell plans in the LSP do not have regard for existing roads or cadastral boundaries and will be unworkable for developers and present unnecessary costs to the LPS process. This can be easily addressed by removing new and unnecessary roads and by working with existing road and cadastral boundaries.</p> <p>6. Due to changes to the planning framework for this area many land owners have been waiting for some time to develop or relocate. Given this, we request that the City considers these proposed minor amendments to the LSP at its earliest convenience to provide certainty for landowners. We trust our suggested modifications will be favourably considered and would welcome the opportunity to further discuss the LSP in more detail before it is formally adopted by Council.</p>	
<p>22.</p>	<p>A7220, A7234, A7248, A7252, A7266</p>	<p>Comments and Objection</p> <p>1. We write on behalf of various landowners on Brand Road, High Wycombe, to provide submission on the City of Kalamunda’s Draft Local Structure Plan (LSP) for Forrestfield North. The consultation period for the Draft LSP closed on 2 July 2018, however, these landowners were granted a two-week extension by the City to allow for a professional environmental technical assessment of the proposal. This assessment was undertaken by 360 Environmental and their advice is attached herewith.</p> <p>2. Primary concern - The Draft LSP shows areas of ‘Environmental Conservation’ and ‘Local Open Space’ over the whole of Lots 26 to 34 Brand Road. Lot 31 also contains a portion of the proposed ‘District Integrator A’, being the main street connecting to the TOD precinct. As a result of these classifications, there is no potential for any development of these properties under the Draft LSP. It is also highly likely that the saleability of these properties, to anyone in the market place – not just a development group – has also been significantly eroded. This is a serious concern for these landowners. Not only may these classifications have a significant impact on land value, it is the reduction in the market desirability of these properties that is of most concern. It may be that there are no short to medium term buyers for these properties, with the City itself being potentially the only party interested in acquisition. However, such acquisition under the Developer Contributions Plan (DCP) is highly likely to be a long-term proposition. If at all. As a result these landowners, many who are elderly, may not have access to the equity in their homes. It also questions the very equality of the Draft LSP and the science around the distribution of Local Open Space on the plan. These elements are addressed further below.</p> <p>3. There are a number of figures within the advertised documentation that depict the environmental values across the Draft LSP area. The following plans show that there is significant vegetation cover, vegetation values and threatened species across the site, not just within the Brand Road precinct.</p> <ul style="list-style-type: none"> • Figure 3 ‘Aerial Plan’ • Figure 12 ‘Regional Vegetation Association and Complex’ • Figure 13 ‘Vegetation Unit’ • Figure 14 ‘Vegetation Condition’ • Figure 15 ‘Threatened and Priority Flora and Banksia Woodland’ <p>Figure 11 ‘Residential Precinct Opportunities and Constraints’ also seems to highlight the vegetated areas and shows two ‘potential environmental linkages’ across the site. Figure 16 ‘Potential Black</p>	<ol style="list-style-type: none"> 1. Noted. 2. The City understands the personal circumstances that many landowners have and are working with the relevant departments and agencies to obtain more certainty around the acquisition of conservation land. The Development Contribution Plan (DCP) will determine the priority of infrastructure items and establish cost apportionment methodologies. There is a possibility that in some instances, a developer may purchase Local Open Space (LOS) land to offset their development contributions, providing infrastructure rather than monetary contributions. The modified Local Structure Plan (LSP) has replaced some areas of POS within the ‘green link’ with development potential through the identification of residential medium density. 3. Consultation with the Environmental Protection Authority (EPA) was undertaken prior to the LSP being released for comment. EPA stated that protecting wavy-leaved smokebush is a priority and that a ‘green link’ would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This ‘green link’ also represented the area where all environmental values best overlapped. 4. The City understands the personal circumstances that many landowners have and are working with the relevant departments and agencies to obtain more certainty around the acquisition of conservation land. The DCP will determine the priority of infrastructure items. There is a possibility that in some instances, a developer may purchase POS land to offset their development contributions, providing infrastructure rather than monetary contributions. The modified LSP has replaced some areas of LOS within the ‘green link’ with residential medium density. 5. Consultation with the EPA was undertaken prior to the LSP being released for comment. The EPA stated that protecting wavy-leaved smokebush is a priority and that a ‘green link’ would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison

	<p>Cockatoo Habitat Trees and Foraging Habitat’ is compelling. This plan shows a broad area of Black Cockatoo Habitat across the site, including a contiguous area within the central west portion of the Draft LSP containing habitat, ‘Suitable Hollows’ trees and most importantly, a ‘Roosting Tree’ location. However, the Draft LSP does not propose to retain any of this central west portion of key environmental values in either ‘Environmental Conservation’ or ‘Local Open Space’ areas. We question how the Draft LSP has prioritised the allocation of areas of ‘Environmental Conservation’, when the ‘Endangered’ Carnaby Cockatoo habitat is not retained and areas of ‘Vulnerable’ (a lesser conservation category) are retained. 360 Environmental make comment in their letter (attached) in this regard, also stating “...consider the clearing or degradation of a known night roosting site as considered a high risk of significant impact.” 360 Environmental also state that the Draft LSP appears to be biased strongly towards the retention of Smoke Bush (88%) with substantially less priority placed on the retention of Black Cockatoo breeding habitat (13%) and Black Cockatoo foraging habitat (29%). As mentioned above, Figure 11 shows two potential environmental linkages across the site. One is located abutting the eastern boundary of the Draft LSP, shown as ‘Environmental Conservation’ and ‘Local Open Space’. This area also includes the proposed Primary School and thus provides a significant area of contiguous green space within the plan. It is also proposed to be developed for a District Recreation area.</p> <p>The inclusion of this land as a ‘Potential Environmental Linkage’ is appropriate given:</p> <ul style="list-style-type: none"> • Its proximity to Poison Gully Creek to the north • Potential connection to the Bush Forever site to the south of Sultana Road West via Smokebush Place • Reuse of the historical refuse site (thus much of this area is held in public ownership) • Its location abutting/buffering Roe Highway • Inclusion of the Primary School • Use for District Open Space <p>This eastern most linkage also has the potential to allow for the movement of fauna across the District Integrator A road at the location this crosses the Roe Highway. The bridge could potentially be designed to allow a space parallel to the Roe Highway for the safe movement of fauna under the District Integrator A road. The second proposed linkage, west of Brand Road, is crossed at grade by the District Integrator Road, significantly impacting upon the movement of fauna along this corridor. Given the above, we question inclusion of a second linkage directly opposite this district space, on the western side of Brand Road.</p> <p>The Draft LSP essentially proposes two abutting linkages and the vast majority of green space to be located in the eastern portion of the LSP area. In doing so the Draft LSP fails to:</p> <ul style="list-style-type: none"> • Protect other significant environmental features within the site • Properly distribute open space within the site for the benefit of future residents <p>4. Local Open Space</p> <p>As described above, the Draft LSP proposes a heavy bias of open space provision in the eastern part of the site. This is considered unnecessary and inappropriate. Given a ‘Potential Environmental Linkage’ is provided east of Brand Road, there is no need to provide an additional linkage on the western side of Brand Road. Given the substantial area of ‘Local Open Space’ shown on the eastern side of Brand Road, there is no need to provide additional ‘Local Open Space’ directly opposite this on the western side of Brand Road. As such, the areas shown as ‘Local Open Space’ on lots 26 to 34 Brand Road should be removed. Given the disproportionate protection of environmental values across the Draft LSP area (as described above and in the attached 360 Environmental letter), it is also recommended that the areas of ‘Environmental Conservation’ shown within Lots 26 to 34 Brand Road be reduced. The Draft LSP should provide equity between the protection of Smoke Bush and Cockatoo habitat and locate the ‘Environmental Conservation’ areas appropriately. This should include reduced areas within Lots 26 to 34 Brand Road and greater areas within the central western portion of the site, to protect the existing ‘Roosting Tree’ and Cockatoo habitat.</p> <p>5. Section 2.7.4.1 of the Draft LSP confirms the uncertainty around the acquisition of areas shown for ‘Environmental Conservation’. This section discusses alternative funding sources (State/Federal)</p>	<p>Gully Creek. This ‘green link’ also represented the area where all environmental values best overlapped.</p> <p>6. Consultation with the EPA was undertaken prior to the LSP being released for comment. EPA stated that protecting wavy-leaved smokebush is a priority and that a ‘green link’ would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This ‘green link’ also represented the area where all environmental values best overlapped. This is a key reason for the current distribution of LOS. The finalisation of the LSP will consider any proposed changes to the distribution of LOS. The City understands the concern regarding the acquisition of land identified as conservation and is working with the relevant State departments and agencies to secure certainty around the acquisition of this land. Including conservation in the DCP is outside the principles of SPP 3.6 – Development Contributions for Infrastructure.</p> <p>7. The LSP is designed to be a long-term plan to enable the best long-term development outcome and create an attractive community. The LSP has been designed on this basis. The three main areas of LOS, being the ‘Green Link’, ‘Educational and Sports Space precinct’ and the Centralised ‘town park’. The LOS is considered to be distributed to the greatest extent possible, having considered environmental values and the future community need. The modified LSP has replaced some areas of LOS within the ‘green link’ with residential medium density.</p>
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	<p>or by third party acquisition for environmental off-sets. Section 2.7.12 outlines the elements the Developer Contribution Plan (DCP) is likely to contain, including Local Open Space. It appears to make no allowance for areas of 'Environmental Conservation'. Given the above, not only is there uncertainty with regard to the timing of any acquisition of Lots 26 to 34 Brand Road, there is no clear mechanism in relation to how these properties will be purchased.</p> <p>6. Landowner Equality. The inclusion of whole landholdings within the Draft LSP as 'Environmental Conservation' and 'Local Open Space' is inequitable. Particularly given the opportunity to more efficiently and effectively distribute these areas throughout the site. The Draft LSP places a huge burden on the owners of Lots 26 to 34 Brand Road, being:</p> <ul style="list-style-type: none"> • There is no development potential of any portion of these lots • There is no clear mechanism to acquire or compensate these owners under the Draft LSP • The open market to purchase these lots is significantly diminished • The ability for these owners to realise the equity in their properties is virtually removed (this includes the possible sale of properties owned by elderly owners to fund moving into retirement accommodation) <p>It is essential the Draft LSP is amended to remove the 'Local Open Space' shown within these lots. The areas of 'Environmental Conservation' should also be reduced. This will provide the owners with some developable land within their properties and thus an asset to sell for development purposes. Given there is an opportunity to retain other significant vegetated areas within the site (as detailed herein and within the attached letter from 360 Environmental), a modification within Lots 26 to 34 is easily supported from a technical/scientific perspective. Such a modification will significantly improve the equality for landowners within the Draft LSP area.</p> <p>7. On behalf of the landowners of Lots 26 to 34 Brand Road, High Wycombe, we propose the following modifications to the Draft LSP:</p> <ul style="list-style-type: none"> • Remove the 'Local Open Space' classification from Lots 26 to 34 Brand Road • Reduce the area of land classified as 'Environmental Conservation' within Lots 26 to 34 Brand Road • Redistribute 'Local Open Space' and areas of 'Environmental Conservation' to more equitably protect local environmental assets (within the central western portion of the site) • Reinforce the 'Potential Environmental Linkage' at the eastern edge of the Draft LSP area by making provision for a fauna crossing under the propose District Integrator A road where it rises to bridge Roe Highway • Reinforce the 'Potential Environmental Linkage' at the eastern edge of the Draft LSP area by setting aside a small portion of land at the front of Lots 100 to 103 Smokebush Place as 'Local Open Space' to connect the Bush Forever site south of Sultana Road West with the District Open Space area (noting that only small portion of these lots will be required for the linkage and development potential will be retained on the balance of these sites) <p>These modifications will assist in resolving the inequality currently impacting landowners within the Draft LSP area. They will also more appropriately distribute open space and protect sensitive areas within the site.</p> <p>We request the City's most earnest consideration of the above in its review and assessment of submissions on the Draft LSP for Forrestfield North.</p>	
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<p>23.</p>	<p>Perth Airport</p>	<p>Comments and Objection</p> <p>1. Perth Airport has reviewed the draft local structure plan and wishes to advise on aircraft noise that the area is subject to. Although the site is outside of the endorsed 2014 ANEF, it will still be impacted by aircraft noise at levels that may be unacceptable to many people. There is also advice on airspace implications and ground-based noise included below.</p> <p>2. Airspace Assessment. The lower level of the airspace in this area is at 61m AHD. Preliminary assessment indicates structures up to 15-20m above ground would not infringe Perth Airport's prescribed airspace. Any application for a structure over this height would need to be referred to Perth Airport for further assessment. Additionally, Airservices Australia operates a microwave communications link through this area. Although it does not preclude development occurring in this area, some proposals would be required to be assessed by Airservices to ensure that communications that are vital to Air Traffic control in the Perth basin are not impacted. We recommend the City of Kalamunda, or other relevant parties engage with Airservices directly to seek guidance on this matter. Perth Airport would be happy to facilitate this engagement.</p> <p>3. Assessment under the Perth Airport 2014 Australian Noise Exposure Forecast (ANEF) & "Noise Above" Contours. The subject area is located outside of the Perth Airport Ultimate ANEF. The subject area's proximity to the outer contour of the ANEF is demonstrated in Attachment 1. Under State Planning Policy 5.1 (Land Use Planning in the Vicinity of Perth Airport) areas outside of the ANEF contours are considered acceptable for all uses. However, the area will still be exposed to levels of aircraft noise that may be unacceptable to some people. Perth Airport produces additional "noise above" metrics, which can assist in demonstrating the likely impact of aircraft noise exposure on an area at the ultimate airfield capacity. The N65 is one such "noise above" metric and is produced because the ANEF is not well suited to conveying the impact of aircraft noise and aircraft noise exposure to the community, as over-flight frequency and the sound level of single events (typically two factors that determine how a person will react to noise) are not clearly translated by the ANEF system. This has been included for reference in Attachment 2. Under the N65 for Perth Airport the north-western portion of the subject area will be exposed to up to 50 aircraft movements exceeding 65 decibels across an average day. Noise at this level is disruptive to a normal conversation, even inside a house, and will be unacceptable to most people. It is also worth noting that the area will receive a significant number of additional noise events at a level less than 65 decibels. Noise events less than 65 decibels may also annoy some people.</p> <p>4. Ground-based Noise Impacts. In addition to the noise impact from air-based sources the subject area will be close enough to the boundary of the future airfield that the impact from ground-based noise sources should be considered. Ground-based noise sources include the noise generated by taxiing as well as the use of Auxiliary Power Units (APUs) which are on-board turbines that provide electricity to aircraft. Attachment 3 shows the likely impact from these two sources ranges from 35-45dBA. However, in adverse conditions this could be up to 50dBA higher. Above 50dBA people may have to start to have their sleep disturbed.</p> <p>5. Perth Airport New Runway Project. Perth Airport is currently conducting a 60 business-day public consultation period for the new runway project. The new runway is proposed to be located approximately parallel to Abernethy Road, in the eastern area of the airport estate. During this current public consultation period, Perth Airport has received numerous comments from landowners. A number of similar concerns have been raised that aircraft noise exposure will occur not only in areas located well outside the ANEF contours, but also areas located outside (or just within) the N65. The consistent message being received by these communities demonstrates that real concern is held regarding aircraft noise, irrespective of the distance located from the airport. It has become apparent that many residents of the suburbs east of the airport were unaware of the location of the future runway, despite the runway's location being included in all Perth Airport public planning documents since 1985. Although the noise impact at sites lateral to the runway, like Forrestfield North, is far below those sites in line with either of the runway ends, it is appropriate that all future residents in this area are made aware that this significant public infrastructure is planned to be located nearby. It is Perth Airport's recommendation that a Notification on Certificates of Title be</p>	<ol style="list-style-type: none"> 1. Noted. 2. Noted. The City will refer applications that meet the provisions described in this submission to Perth Airport. 3. Noted. Development will be required to have noise attenuation parameters in place to reduce the effects of aircraft noise. 4. Noted. 5. Noted, see point 3 above. 6. Noted. See point 3 above.
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		<p>required for new lots. Previous determinations by the Minister for Planning have considered the following words to be appropriate: "This land is subjected to aircraft noise at any time by the 24 hour a day, 7 days a week passenger and freight aircraft flight operations arriving and departing Perth Airport. The frequency of aircraft movements and the size of aircraft are forecast to increase indefinitely into the future. It is the responsibility of landowners to noise attenuate their property to ensure their amenity, as Perth Airport will remain curfew free." 6. Given the above assessment, Perth Airport has no objection to the proposal subject to the advice provided. As advised, due to the proximity of the subject area to the new runway site, Perth Airport strongly recommends notifications are placed on the title of all future lots advising of aircraft noise exposure. Perth Airport appreciates the opportunity to comment.</p>	
<p>24.</p>	<p>Nature Reserves Preservation Group</p>	<p>Comments and Objection 1. NRPG welcomes the opportunity to comment on the above Structure Plan. We have, in the past, made submissions on proposals affecting much of this area, in defence of valuable remnant natural bushland under stress or endangered by development. Many concerns, expressed in our 2004 submission to the Kewdale –Hazelmere Region Integrated Master Plan and our 2015 submission to the District Structure Plan for this area, are still current. NRPG’s submission on the District Structure Plan expressed environmental concerns over the fate of Bush Forever sites and areas of remnant vegetation containing declared rare flora and/or Threatened Ecological Communities. 2. We saw the District Structure Plan as having the capacity to pose a serious threat to valuable remnant vegetation, containing rich biodiversity and, to the work carried out along Poison Gully Creek over many years, by volunteers and Shire on-ground staff. Given this potential threat, it is essential the Local Structure Plan acknowledges the natural attributes of the area, addresses concerns over their ultimate fate and, ensures that, through environmentally sensitive strategies and constraints, these valuable attributes remain intact. 3. Conservation. <i>The EPA advised that it is expected the Local Planning Scheme No. 3 (LPS3) text as part of a future amendment be modified to include provisions which would contain: "specific mechanisms and adequately secure, protect and manage the significant environmental values within the amendment area".</i> These and later expectations of the EPA, indicate the importance placed by that body on the environmental values of this precinct. We trust that their recommendations and concerns are all addressed in the final Local Structure Plan. We recognise the problems posed by private land ownership and the financial implications attached to this. In light of Perth Airport’s sad record of clearing its Banksia Woodland of the Swan Coastal Plain TEC, we see some potential opportunities for similar vegetation within the Residential Precinct to serve as offsets for further airport clearing. Such a course may also solve one of the funding concerns expressed in the agenda. 4. Forrestfield North Residential Precinct Local Structure Plan. Vol. 1 (p.442/1430) <i>Executive Summary.</i> (p. 446) <ul style="list-style-type: none"> • <i>The retention of the significant environmental values of the area to the greatest extent practical.</i> • <i>The protection and enhancement of the ecological value of Poison Gully Creek.</i> Several important references to the natural environmental assets of the area are made and are welcomed. These should be central to any developments as they constitute the main element of a sense of place. Poison Gully Creek is extremely important and the need to protect and enhance this environmental and cultural asset cannot be overstressed. If work carried out by members of NRPG over many years, often with the assistance of city staff, is not to be wasted, extreme care must be exercised when carrying out any work on, or close to this creek line. 5. <i>The local structure plan provides for over 30 hectares of open space in the form of local open space, environmental conservation areas and pre-existing Bush Forever. A landscaping concept plan has been prepared by Place Laboratory to broadly depict the open space intent and support the approach to water management. The landscaping concept plan is based on the ambition to create a 'Forest Neighbourhood', a medium to high density area with a bush character.</i> (p. 447). This "ambition" is commendable. See above 'a sense of place.' Do the 13 conservation areas mentioned</p>	<ol style="list-style-type: none"> 1. Noted. 2. The Local Structure Plan (LSP) has ensured that Bush Forever sites and Poison Gully creek are protected. The LSP includes a 'green link' which aims to protect many environmental values and connect Bush Forever sites and Poison Gully Creek. 3. Consultation with the Environmental Protection Authority (EPA) was undertaken prior to the LSP being released for comment. EPA stated that protecting wavy-leaved smokebush is a priority and that a 'green link' would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This 'green link' also represented the area where all environmental values best overlapped. This is a key reason for the current distribution of Public Open Space (POS) and location of conservation. 4. Consultation with the EPA was undertaken prior to the LSP being released for comment. EPA stated that protecting wavy-leaved smokebush is a priority and that a 'green link' would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This 'green link' also represented the area where all environmental values best overlapped. This is a key reason for the current distribution of POS and location of conservation. 5. The Public Open Space Strategy was adopted in May 2018. The POS Strategy does not include the proposed reserves in the LSP as they are yet to be formalised. 6. Tree retention within development cells will be considered at the cell density plan submission stage. 7. The City will request additional information where applicable and/or when an external agency requests the information to be submitted. 8. Noted. 9. Noted. 10. The intention of the areas identified as 'Environmental Conservation' is for them to be reserved as 'Parks and Recreation' under the Metropolitan Region Scheme and effectively protecting them from future development. 11. The Environmental Assessment and Management Strategy outlines the environmental values and strategies for best protecting those environmental values. 12. Consultation with the EPA was undertaken prior to the LSP being released for comment. EPA stated that protecting Wavy-Leaved Smokebush is a priority and that a 'green link' would also be

	<p>correspond to those in the city's draft Public Open Space Strategy? Has this section been reconciled with that draft and, in what order will these two drafts be released in their final form?</p> <p>6. Implementation. (p. 456). <i>4.2 Prior to subdivision or development, a cell density plan is to be submitted for each cell, incorporating the additional information as set out in table 2.</i> (p. 459). It is at this "cell density plan" submission stage that the contentious question of tree retention may be tackled. Retention of such trees is essential if the character of the area is to achieve its "forest neighbourhood" objective (see comment above).</p> <p>7. <i>4.3 Conditions of Subdivision and Development Approval.</i> (p. 459). <i>At the time of subdivision, the City may recommend conditions to the WAPC, as applicable, requiring the preparation and/or implementation of conditions outlined in Table 3.</i></p> <p>This section is of great concern. NONE of the "Additional Information To Be Submitted" will need to be submitted, unless the city makes the recommendation to WAPC. It is unclear whether the city may select only the additional information it decides is required for each item. Unfortunately, the phrase "as applicable", appears to give the city staff and councillors a free hand. The NRPG places great reliance on requirements, including the following, being implemented: <i>Development of a Strategic Conservation Management Plan for all Environmental Conservation Areas. Development of a Construction Management Plan (for works proposed within the Poison Gully Foreshore area). Development of a Construction Environmental Management Plan to incorporate environmental elements during pre-construction and during construction. Complete a Landscape Feature and Tree Retention Plan (to create an ecological linkage).</i></p> <p>8. <i>Bushfire management</i> (Table 3 item 1). In the preparation of Bushfire Management Plans consideration should be given to how best to comply with the BMP guidelines, whilst retaining environmental biodiversity values. Failure to do so will threaten the above "forest neighbourhood" objective.</p> <p>9. <i>Items 9 – 14</i> (Table 3). All the above appear to address many of the concerns we have over the potential for this Local Structure Plan to damage the cultural and environmental values of the area. The extent and importance of these items in maintaining the "forest neighbourhood" objective, increases concern over the power apparently being given to the city and its councillors.</p> <p>10. <i>6.2 Structure Plan Area Normalisation. Table 4.</i> (p.464) <i>Environmental Conservation.</i> Given the lack of protection from planning and development activities, existing now, will this reservation as 'environmental conservation' give any effective protection against future development threats?</p> <p>11. Explanatory Report Planning Background. (p.476) <i>Site Conditions and Constraints</i> (p. 500). <i>2.1 Biodiversity and Natural Area Assets.</i> For NRPG, this is one of the most critical segments of this section. Failure to describe thoroughly, the environmental and heritage values within the precinct and adjoining areas, could result in unintentional or opportunistic damage to such values. Every avenue for identifying "potential opportunities to secure, protect and manage the significant environmental values on site and present management requirements" should be explored. Once these environmental values fall below a critical level, they are lost.</p> <p>12. Appendix C. Banksia Woodlands of the Swan Coastal Plain Assessment (p. 743/1430). Whilst the consultant's brief for this assessment would have no requirement to do so, consideration of the significant loss of this TEC within the Perth Airport estate, should be borne in mind and its relevance to this LSP acknowledged. The airport policy remains that, on the grounds of safety of the flying public, remnant bushland, including the BWSCP TEC, should be cleared. The loss of TEC to be offset with other areas, often far removed from the estate. This policy coupled with the commercial imperative to have every square metre of the estate producing revenue (resulting in comprehensive clearing within previously designated Conservation Precincts) makes the retention of natural vegetation complexes (including this TEC) more important than ever.</p> <p>13. Appendix 2. Floristic Community Type Analysis (p. 808/1430). <i>2.2 Banksia Woodlands of the Swan Coastal Plain verification</i> (p. 815). See earlier comments regarding use of such areas as Perth Airport offsets.</p> <p>14. <i>2.2.4 Additional Information. A buffer zone is...</i> Were such buffer zones required? If so, were they specified and clearly identified?</p>	<p>recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This 'green link' also represented the area where all environmental values best overlapped. This is a key reason for the current distribution of Local Open Space (LOS) and location of conservation. The City is liaising with State agencies and Perth Airport on ways to offset the areas designated as 'conservation'.</p> <p>13. Consultation with the EPA was undertaken prior to the LSP being released for comment. EPA stated that protecting Wavy-Leaved Smokebush is a priority and that a 'green link' would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This 'green link' also represented the area where all environmental values best overlapped. This is a key reason for the current distribution of LOS and location of conservation. The City is liaising with State agencies and Perth Airport on ways to offset the areas designated as 'conservation'.</p> <p>14. A minimum 50m width was applied to the 'green link' to allow for a consolidated ecological corridor. POS surrounding conservation areas provides a buffer around these sites.</p> <p>15. A Level 2 spring vegetation survey was undertaken in 2016.</p> <p>16. No concerns have been raised from the Department of Biodiversity, Conservation and Attractions (DBCA) or Department of Water and Environmental Regulation (DWER) submissions in relation to these precautions.</p> <p>17. Consultation with the EPA was undertaken prior to the LSP being released for comment. EPA stated that protecting Wavy-Leaved Smokebush is a priority and that a 'green link' would also be recommended connecting the Bush Forever site on Sultana Road West with the environmental values adjacent to Brand Road and with Poison Gully Creek. This 'green link' also represented the area where all environmental values best overlapped. This is a key reason for the current distribution of LOS and location of conservation.</p> <p>18. Noted.</p> <p>19. During the preparation of the LSP the Department of Aboriginal Affairs was consulted (now part of the Department of Planning, Lands and Heritage [DPLH]). The LSP was referred to DPLH.</p> <p>20. Perth Airport has been consulted during the preparation of the LSP and the LSP was referred to them.</p> <p>21. Noted.</p> <p>22. The landscaping of POS will require detailed design to consider vegetation that is considered 'non-flammable'.</p> <p>23. Noted.</p> <p>24. Noted.</p> <p>25. Noted.</p> <p>26. Noted.</p> <p>27. Noted.</p> <p>28. The draft Community Infrastructure Strategy for the LSP was utilised to finalise and inform the POS Strategy. The District Open Space in the LSP was identified in the POS Strategy as a potential sports space and the POS Strategy notes the importance of POS in Forrestfield to provide more POS opportunities in High Wycombe.</p>
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Given the vague "implication" of the desk top study, together with the later "inconclusive" response from DBCA, surely the precautionary principle should apply?</p> <p>17. <i>5. Conclusion</i> (p. 837) <i>The native vegetation mapped as Woodlands in Good or Better condition within the Forrestfield North survey area represents the Federally listed Banksia Woodlands of the Swan Coastal Plain. This community extends for 15.30 ha and is considered in Very Good to Excellent condition in accordance with the Banksia Woodlands key diagnostic criteria.</i> Given the stated condition of this remnant TEC, there should be even more pressure on the city to ensure its survival, if the city wishes to retain its environmental credibility.</p> <p>18. Appendix 3 Report of an Ethnographic Assessment of the Forrestfield North DSP (Ethnoscience, 2018) (p. 886/1430). Whilst this report appears originally compiled for Strategen consultants for the District Structure Plan, its 2018 date indicates it is still relevant and suggests little has changed in the interim. The importance of protecting and maintaining the integrity of sites such as Poison Gully Creek cannot be over-emphasised. It is essential from both an environmental and an ethnographic viewpoint. Since the main threats to this site come from the results of poor water management, inadvertent damage during development near the site and, potential vandalism to any revegetation projects, all these must be addressed in detail in this Local Plan.</p> <p>19. <i>Allawah Grove site is, to Aboriginal people, one of the most important historic/human/mundane sites in the Perth Metropolitan area.</i> (p. 12/907). <i>A brief glimpse of life at Allawah Grove is crucial to understanding the contemporary significance of Poison Gully Creek.</i> (Ibid.) <i>Munday Swamp (DPLH ID 3719), into which Poison Gully Creek (DPLH ID 25023) originally flowed, is located on Perth Airport land to the west of the study area. Nyungars previously have expressed concerns about impacts on Poison Gully Creek having downstream negative impacts on Munday Swamp</i> (p. 28/923). <i>Munday Swamp is a place of importance and significance to Nyungars and in a sense its significance frames the attribution of significance to other heritage places within the Forrestfield North DSP study area's environs and is directly linked to Poison Gully Creek and its status as an aboriginal Site</i> (p. 29/924). <i>Envisaging that further consultation would be necessary as the Forrestfield DSP proceeds, the men nominated two other women they want included in any follow-up meetings.</i> (p.40/935). Has any such "further consultation" taken place or, is any expected to take place?</p> <p>20. Recommendations (p. 46/941). All six recommendations should be implemented, if the importance of these significant sites to the Nyungar is to be highlighted. Whilst the city now acknowledges the original owners of the land, implementing these recommendations would give substance to that fact. These recommendations, made in relation to the District Structure Plan, should be addressed further in this Local Structure Plan. Given the important relationship between Poison Gully Creek, Mundy Swamp and Allawah Grove, close collaboration with Perth Airport staff is essential. Should an archaeological survey within the Plan area reveal artefacts, the city should consult with the airport for advice on how to handle such finds. This may lead to publicly displaying finds, with the permission of the appropriate Nyungar elders, at an interpretive facility within the city.</p> <p>21. Bushfire Management Plan (p. 951). It is essential that, whilst working within the SPP 3.7 Guidelines, every effort is made to retain as much of the natural vegetation as possible. The stated</p>	<p>29. The provision of aged care development remains a high priority for the City. Given there are several locations within the LSP area that would be suitable for aged care, this it has not been specifically identified on the LSP. The residential classification on the LSP will enable consideration of aged care development in the future. The City will continue to advocate and encourage aged care providers to develop integrated aged care. There may also be opportunities within the TOD part of the DSP for site specific aged care developments.</p> <p>30. Noted.</p> <p>31. The predicted traffic numbers are generated through data supplied by Main Roads and overlaying inputs such as future population projections and predicted traffic flow. The Development Contribution Plan (DCP) will detail where land is required to be purchased for the purpose of road widening. The DCP will be commenced when the Residential Precinct and Transit Oriented Development (TOD) Precinct LSPs are at a level of certainty. Where properties are identified for road widening, the City will engage a land valuer to determine the value of land. The City will then negotiate with landowners to purchase the land for road widening when that infrastructure is required.</p> <p>32. Noted.</p> <p>33. Noted.</p> <p>34. Noted.</p>
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	<p>intention to protect environmental conservation reserves and Bush Forever sites, is welcome. The vague nature of the reference to <i>"various levels of vegetation clearing and some thinning"</i> however, is concerning.</p> <p>22. City of Kalamunda Fire break and Fuel Load notice (p. 1001). 2. <i>Land with a building on it, with an area less than 5000m²</i>. Once again, we highlight the confusion generated by this document. Whilst <i>"living trees, shrubs, plants, lawn under cultivation are excepted"</i> from the 50mm height property requirement, the Asset Protection Zone requirement that <i>"non-flammable vegetation (etc) are permitted only."</i> No assistance is provided to determine what managed vegetation is considered <i>"non-flammable"</i>.</p> <p>23. Technical Appendix D. Forrestfield North Residential Precinct Local Water Management Strategy (LWMS) (p. 1060) <i>Groundwater availability</i> (p. 21/1092). See later comments on the MAR and the possibility of planning for if and when the volume of stormwater exceeds the capacity for storage. Water Sustainability Initiatives (p. 30/1101). 3 <i>Evaluation of Options</i> (p. 31/11020). Surface Water Management Strategy (p. 36/1106). <i>Minor Drainage System</i> (Ibid). The suggested design requirements and recommendations will all serve to reduce surface run off. On that basis, they have our support and, we look forward to the finalised raingarden designs being displayed.</p> <p>24. <i>5.1.2 Major Drainage System</i> (p. 40/1111). Point 5. The construction of these outlets into Poison Gully Creek, should, in addition to minimising potential impacts of construction on Aboriginal Heritage values, ensure that environmental values will also benefit from their construction.</p> <p>25. <i>5.1.3 Lot scale water management</i>. Extending surface water management to include individual bio retention systems at lot level is a welcome initiative. It has been used elsewhere with success and, if its implementation is made a condition of development at some stage, it could play a significant part in surface water management within the Residential Precinct.</p> <p>26. <i>5.1.4 Pervious pavements</i>. We have in past submissions been advocating the use of such surfaces to reduce the amount of runoff flowing into the creek lines in heavy downpours. It is encouraging to see this system, together with the earlier systems, recommended as integral parts of developments within the Residential Precinct. Suggest that, given the extent of scouring of the Poison Gully Creek line (exacerbated by the lack of such paving in developments surrounding the upper reaches of hills water courses), the adoption of such surfaces should be more widespread throughout the scarp developments.</p> <p>27. <i>5.3 Surface Water Quality Management</i> (p. 45/1116). 7 Water conservation and efficiency (p. 48/1119). <i>7.1 Potable water consumption</i> (Ibid). Any strategies aimed at achieving such a significant reduction in the use of this valuable resource, are welcomed, in the interests of truly sustainable living. The three proposals <i>"On the basis of these findings"</i>, are an encouraging sign, provided that the city staff and councillors have the foresight to implement them.</p> <p>28. Community Infrastructure Strategy (p. 1225). How does this Strategy mesh with the current draft Public Open Space Strategy draft?</p> <p>29. <i>Executive Summary</i> (p. 4/1228). <i>"A range of infrastructure needs has been identified"</i>. Unfortunately, we find no reference in the summary, to the need for appropriate aged care. Given its high profile within the city and at State Government level, we would expect it to be on the list of items. Whilst the District plan stated: <i>"Local structure planning should provide for the establishment of aged care facilities where appropriate"</i>, this Local Structure Plan appears to deem the establishment of such facilities in Forrestfield North Residential not <i>"appropriate"</i>. Given the comment (in 4.1 Community Infrastructure Trends Analysis overview), that there is changing community profile <i>"particularly an ageing demographic"</i>, we would expect, at the very least, to find here a reference to the table on p.17/1241, relevant to the <i>"Vision"</i> of the DSP. Whilst the table refers to the District Structure Plan, it states, under <i>"Aged care services"</i>, that: <i>"The preparation of detailed local structure plans for Forrestfield North are expected to specifically consider and provide: Locations for aged care accommodation and allied facilities within close proximity and with excellent linkages to the proposed activity centre and TOD Precinct"</i>. In our 2015 submission on the District Structure Plan, our comments on section <i>5.4.2 Aged Care</i>, reflected our</p>	
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	<p>concern that the District plan made no firm provision for aged care. Our submission suggested aged care should be assigned a priority, second only to the preservation of the environment. That remains our position. The Community Infrastructure table, Item 4.1 Aged accommodation, "required in FN as per structure plan" (p. 22/1247) also refers to the District plan. Unless we have missed it in this complex document, the Local Structure Plan, on this topic, fails to live up to the vision and guiding principles of the District plan. It is unfortunate that this Community Infrastructure Strategy document refers only to "Forrestfield North Structure Plan" in what is intended to be the Local Structure Plan document. It is unclear of its relevance to the Local Plan.</p> <p>30. Transport Impact Assessment (p.1277) <i>Executive Summary</i> (p. 4/1280). Initiatives such as the provision of shared or cycle paths, adequate street parking, parking and charging points for electric vehicles (the use of which is to be encouraged), including the recommendation to review the mandated rate of provision of charging points every five years should be implemented. In the case of electric vehicle charging points, the phrases "<i>should be considered</i>" and "<i>should be reviewed and revised</i>" need to be more strongly worded. If the city is to keep up with the technological progress in this area, it must be more committed to accommodating such rapid changes.</p> <p>31. Infrastructure Servicing Report (p. 1405). <i>1.1 Executive summary</i> (p. 5/1409). The stated requirement for widening sections of some roads raises questions. How accurate is the modelling for future traffic figures? How will the proposed widening of roads such as Maida Vale Road (east of Milner Road) affect residents along those roads? Will they be required to forfeit land and, if so, will this involve compensation being paid and, by whom?</p> <p>32. <i>2.1 Proposed Development</i> (p. 8/1412). "<i>The existing vegetation and topography to the area are the key assets to be maintained.</i>" Whilst this is encouraging we would prefer to see more commitment demonstrated and, the stated aim read: "<i>...key assets retained and maintained</i>".</p> <p>33. <i>2.6 Stormwater drainage</i> (p. 16/1420). <i>Managed Aquifer Recharge</i> (p. 19/1423). Whilst the use of this system has been considered impractical and/or uneconomic at this stage, perhaps consideration could be given to 'future-proofing' this decision, by keeping MAR in mind when planning the stormwater management strategy. The Water Sensitive Urban Design (WSUD) methods of stormwater harvesting and re-use are to be encouraged. Their adoption (particularly the Catch Basin inserts and ECOAID system) would help reduce further damage to creek lines and critical infrastructure.</p> <p>34. Conclusion - Concern still exists over whether or not the city liaised with the Federal Member for Hasluck concerning his Green Plan initiative, before producing this draft, whether consideration has been given to utilising topsoil removed during development, as a seedbank source, where native plants are endemic to the site and, whether the city has addressed the EPA concerns resulting from the District Structure Plan. Whilst in attempting to absorb this complex document, other concerns may have remained unstated, some, such as the community concern for the fate of the Black Cockatoos and their habitat, must be seen as a 'given'. It is vital that this Local Structure Plan places the natural environment at the top of the priority list. Whilst caring for this environment may be seen as an isolated aim, the flow-on benefits to the community, by giving it the highest priority, are now widely accepted and should be acknowledged. Both the physical and mental health of residents will benefit from taking this path. The Plan, whilst giving some cause for concern over the degree to which the consultants' recommendations will be implemented and, the occasional use of non-committal phrasing, gives hope that, despite the increasing planning pressures placed on the city, it may serve to protect the natural environment which is still a major characteristic of the area. Seen in the context of the Forrestfield Airport Link (FAL), the plan may be considered the most important planning initiative embarked upon by the City. It presents a golden opportunity. Failure to capitalise on this opportunity would serve to demonstrate the City's apparent inability to keep up with rapidly changing technologies and community expectations. Success will enable the City to regain its reputation as an environmentally-aware local government and, in the process, take full advantage of the opportunities offered to the area on completion of the link. Sustainability factors featuring in the plan (such as the recognition of the increased carbon footprint from importing fill) and a longer-term view of proposals such as charging infrastructure for electric vehicles, are encouraging.</p>	
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<p>25.</p>	<p>Freight and Logistics Council of Western Australia</p>	<p>Comments</p> <p>1. The Freight and Logistics Council of Western Australia Inc (FLCWA) comprises senior decision makers from industry and Government whose charter is to provide independent policy advice to the Minister for Transport on issues impacting the provision of freight and logistics services in this State. Since its inception, FLCWA has been strongly focussed on the threat to strategic freight corridors from encroachment by incompatible land uses, particularly residential developments. It is in this context that FLCWA would like to thank you for the opportunity to comment on the proposed Forrestfield North Local Structure Plan: Residential Precinct (the Structure Plan) on behalf of its industry members.</p> <p>2. The FLCWA was a member of the City’s Forrestfield North Local Structure Plan Technical Advisory Group, to represent the interests of our members in relation to the strategic protection of Roe Highway on the eastern boundary and the freight rail main line, freight rail infrastructure (intermodal terminal, marshalling yards and workshops) and several key freight and logistics operations located on the western boundary of the structure plan precinct. Enclosed is a plan illustrating the location of Roe Highway, the freight rail main line and the abutting freight related operations, all of which rely on the unrestricted operation of the freight rail line for supply chain efficiency and operational productivity, in relation to the Structure Plan area.</p> <p>3. Regarding the impact of road and rail noise and the protection of strategic freight transport corridors, it is acknowledged that the Structure Plan area is:</p> <ul style="list-style-type: none"> • Outside of the area affected by vibration impacts from the freight railway; • Outside of the area affected by noise impacts from the freight railway; and • Affected by road noise from Roe Highway (and several local roads within the Structure Plan). <p>4. The FLCWA encourages the consideration of road and rail noise during the earliest stages of the planning process, to ensure that suitable land uses are proposed to abut freight transport corridors to respond to noise impacts on urban amenity, and in particular on noise-sensitive land uses such as residential dwellings.</p> <p>5. In that context, the FLCWA supports the inclusion of conditions for subdivision and development, within the Structure Plan, to:</p> <ul style="list-style-type: none"> • guide decisions on the use, subdivision and development of land affected by road noise; • require the provision of site specific noise assessments for some areas of land; and • guide the imposition of appropriate conditions of approval to manage and mitigate noise impacts to acceptable levels for the benefit of future residents; <p>which in turn, affords a greater a level of protection for the continued, unfettered operation of Roe Highway.</p> <p>6. It is noted that the Lloyd George Acoustic Transportation Noise Assessment illustrates the benefits of the construction of a 4m high noise wall along the eastern boundary of the Structure Plan area, abutting Roe Highway to mitigate the impact of road noise. Whilst the FLCWA supports the inclusion of a condition of subdivision and/or development approval requiring the construction of an acoustic wall, where the predicted noise levels are above 65dB LAeq(Day), further consideration should be given to the wording of Condition 3.4, which currently reads: “3.4 In respect to residences proposed alongside Roe Highway, where the predicted noise levels are above 65 dB LAeq(Day), a suitably designed noise wall is to be provided.” The term “alongside Roe Highway” is</p>	<p>1. Noted. 2. Noted. 3. Noted. 4. Noted. 5. Noted. 6. The detailed location, length and design of the noise wall will be undertaken closer to implementation. These details will be considered for inclusion in the finalised Noise and Vibration Impact Assessment. 7. Noted.</p>

		<p>ambiguous and requires further clarification and/or replacement with "in proximity to Roe Highway". Lloyd George Acoustics illustrated the benefits of an acoustic wall abutting Roe Highway, along the entire length of the Structure Plan boundary, however the current wording of the condition is ambiguous as to the location of a required noise wall. This raises a question over the effectiveness, visual amenity and limitations on passive surveillance that would result from the construction of several independent, non-contiguous noise walls on individual lots. Further consideration should be given to the inclusion of the construction of a contiguous acoustic wall along the eastern boundary of the precinct, abutting Roe Highway, within a Development Contribution Plan and the need, or otherwise, for the acoustic wall to be pre-funded and constructed ahead of subdivision and/or development.</p> <p>7. The FLCWA strongly encourages the consideration of road and rail noise impacts at the earliest stage of the planning process to ensure that land use, subdivision and development deliver the best outcomes for both freight efficiency and urban amenity.</p>	
<p>26.</p>	<p>Department of Health</p>	<p>Comments</p> <ol style="list-style-type: none"> 1. Water Supply and Wastewater Disposal: All developments are required to connect to scheme water and reticulated sewerage as required by the Government Sewerage Policy – Perth Metropolitan Region. 2. Medical Entomology: The proposal is located in an area that is prone to mosquito prevalence particularly if wetlands are in the vicinity. A mosquito management plan is required and should be implemented prior to the occupation of the development. The structure plan should consider development conditions that minimise the potential for mosquito breeding. Further details on mosquito management may be downloaded from: http://ww2.health.wa.gov.au/articles/J_M/Mosquito-management 3. Public Health Impacts: DOH has a document on 'Evidence supporting the creation of environments that encourage health active living' which may assist you with planning elements related to this structure plan. The City of Kalamunda should also use this opportunity to minimise potential negative impacts of the increased density development such as noise, odour, light and other lifestyle activities. To minimise adverse impacts on the residential component, the City of Kalamunda could consider incorporation of additional sound proofing / insulation, double glazing on windows, or design aspects related to location of air conditioning units and other appropriate building/construction measures. Further design elements that should be considered include: <ul style="list-style-type: none"> • A range of quality public open spaces should be provided to contribute towards the recreation, physical activity, health and social needs of the community. • Parks and open spaces should be located within walking distance of most residents along well-lit connected routes and be co-located with other community facilities to encourage access by walking or cycling. • The design of parks and open space and the infrastructure provided within them should cater for a variety of users to undertake a mix of activities that increase physical activity, provide access to health nutritious foods (though community gardens) and prevent injury. 4. Specific School Siting Considerations <ul style="list-style-type: none"> • Health Risk Assessment: Consider potential health risks of proposed site (through a health risk assessment or another methodical analysis of health impacts), including the location's supportiveness and safety for physical activity; air pollution and asthma levels' past or present contamination of site or nearby areas; and nearby sources of pollution, noise, dust or contaminants, such as highways and potential conflicting land uses such as for fast food locations. • Safe Infrastructure for Walking, Bicycling, and Public Transportation in School Vicinity: Improve the safety of travel by foot, bike, and public transportation near schools and on school property by providing safe infrastructure including a 'Safe Routes to School' plan to maximise opportunities for walking and biking to school. 	<ol style="list-style-type: none"> 1. Noted, this will be required across the whole structure plan area. 2. The City will start developing a Mosquito Management Plan this year to ensure it is in place prior to residential occupation. 3. These measures will be considered by the City when assessing Development Applications to ensure adverse impacts upon amenity are controlled. In addition, the City through its next health and wellbeing plan has actions relating to the development planning policies that improve health outcomes. 4. The site selected for the school is a former landfill site, the City is working to have all the technical studies undertaken on this site to allow for the portions of the site that were utilised for landfilling to be appropriately remediated and developed into ovals and playing fields.

		<ul style="list-style-type: none"> Integrate with public transport: Ensure that the areas surrounding schools have footpaths, bicycle lanes, or whatever infrastructure is necessary to allow students to safely travel to school through different modes of transportation. Ensure that site design safely accommodates students arriving and departing by all modes of transportation, including walking, bicycling, public transportation, school bus, and private vehicles: prioritise safe access for children who are bicycling or walking (including those walking after drop-offs from cars or buses). Consider facility and transportation equity for students and families with disabilities. 	
<p>27.</p>	<p>Department of Biodiversity, Conservation and Attractions</p>	<p>Comments</p> <ol style="list-style-type: none"> I refer to your letter of 8 May 2018 requesting comments on the proposed Forrestfield North Residential Local Structure Plan (LSP). The Department of Biodiversity, Conservation and Attractions' (DBCA) Parks and Wildlife Service including Rivers and Estuaries Branch have reviewed the referred information and provide the following advice. DBCA has recently been represented on the City of Kalamunda's State Agency Technical Advisory Group for the North Forrestfield District Structure Plan. This involvement included discussions and provision of feedback, in conjunction with the Environmental Planning Branch of Department of Water and Environmental Regulation (DWER), to the City in relation to the draft concept and design of the current LSP. As a result of this consultation, both DWER and DBCA recently provided indicative support for the North Forrestfield concept plan which appears to be consistent with the current draft LSP design. Threatened Flora and Ecological Communities. On review of the Forrestfield North Level 2 Flora and Fauna Survey (2017) provided with the referral, it was determined that appropriate methods were applied by AECOM for the conduction of the flora and vegetation survey. It was also considered that the subsequent statistical analysis and interpretation of collected data was in accordance with DBCA's recommendations. Findings from the survey report, which were supported by DBCA, concluded that a majority of the remnant vegetation within the survey area aligns with the threatened ecological community (TEC) FCT20a (Banksia attenuata woodlands over species rich dense shrublands). FCT 20a is often associated with the presence of the threatened flora species <i>Conospermum undulatum</i>, which was also recorded extensively throughout the LSP area. It should be noted that the environmental values listed above are protected under both State and Federal legislation. The threatened flora species <i>C.undualtum</i> is protected under the Western Australian Wildlife Conservation Act 1950 and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The TEC SCP 20a is protected under the Environmental Protection Act 1986 and also under the EPBC Act as it forms part of the Federally listed Banksia woodlands of the Swan Coastal Plain TEC. The scale and widespread nature of the environmental values identified throughout the LSP area were considered in detail in the planning for the site. It is recognised that due to the number of isolated small vegetated remnants found throughout the existing rural residential landscape, retention and protection of all significant values would not be possible. The negotiated LSP design outcome, based on the previous consultation with relevant agencies, was considered the best planning and environmental outcome. For those properties which contain known occurrences of <i>C. undulatum</i> that are proposed to be impacted, proponents should be aware that irrelevant of previous support from relevant environmental agencies any proposals to clear or 'take' threatened flora will also require permission from the State Environmental Minister via a 'permit to take' in accordance with the Wildlife Conservation Act 1950. Proposed Environmental Conservation reserves. It is noted that the identification of a 30 hectare central open space corridor within the LSP area is the primary method proposed to ensure the future retention and protection of a majority of the environmental values on site and it is 	<ol style="list-style-type: none"> Noted. Noted and agreed. Agreed. Sections 1.3 (Table 1) and 1.4 (Table 2) of the Environmental Assessment and Management Strategy (EAMS) identify the Declared Rare Flora (DRF) and Threatened Ecological Communities (TEC) listing and application of Federal and State legislation. Noted and agreed. Agreed. Section 1.4 Table 2 EAMS identified the Wildlife Conservation Act 1950 (WA) (and gazetted Biodiversity Conservation Act 2016) and the Conservation and protection of wildlife (flora and fauna). Special provisions and schedules apply to the protection and management of gazetted rare flora and fauna. Recommendation: When Development applications/proposed are received, the City can note the requirement of permits in accordance with the <i>Biodiversity Conservation Regulations 2018</i> within approval notices. Agreed. The location of environmental values i.e. DRF, Banksia Woodlands SCP TEC, Black cockatoo foraging habitat extends across existing cadastral boundaries which are owned by difference land owners. To avoid adhoc and different management approaches to proposed Environmental Reserves (EC) a strategic Conservation Management Plan is recommended, which can be implemented by various stakeholders i.e. local government, landowners, DBCA. As discussed in Section 3.7 of the EAMS the proposed EC areas are currently within multiple private ownerships, the acquisition and management of the ECs will ensure the long-term retention and security of the key environmental matters (particularly the Waxy-leaved Smokebush) within the Residential Precinct. Acquisition of these areas and their management will be further negotiated/discussed with the City and State government. The inclusion of a Conservation Management Plan as part of the LSP will be considered as part of the finalisation of the LSP supporting technical appendices. Table 18, in the EAMS recommends that the Strategic Conservation Management Plan (CMP) be developed once the LSP has been approved. Essentially, the CMP would support the LSP, subsequent subdivisions within the residential would need demonstrate compliance with the CMP. An example of this is the City of Wanneroos Woodvale Local Structure Plan No. 64 (SP64) which was supported by a "Wetland Management and Rehabilitation Strategy". The strategy identified a framework to coordinate the rehabilitation of the wetland (and Bush Forever site) in association with the SP64 development. This document was designed to demonstrate the on-ground rehabilitation outcomes, at an appropriate strategic level, to support the SP64

	<p>understood that this open space corridor will comprise of both active and passive local open space with the focus on minimising impacts and improving connectivity. DBCA notes that the primary mechanism identified by the City to implement the proposed environmental conservation areas is through State government acquisition as regional open space. This is not a standard approach to protecting local open space areas and the City would need to liaise with the Western Australian Planning Commission to determine the suitability of this option. The City may need to investigate alternate mechanisms to reserve and protect these areas within the development. DBCA recommends that the open space corridor be managed as one reserve with multiple management purposes identified within including public recreation and conservation.</p> <p>7. The Environmental Assessment and Management Strategy (EAMS) document states that the development of a Strategic Conservation Management Plan (SCMP) is proposed at the individual subdivision stages of the development. DBCA considers that the protection and treatment of the identified open space areas needs to occur as part of the current LSP not post approval. The SCMP should provide assurance, as part of the structure plan process, that the values within the Environmental Conservation and other open space areas will be retained, protected and enhanced while allowing for restricted active and passive recreational facilities. In the absence of this SCMP at the LSP stage, resolution of any identified issues would be deferred to the subdivision planning stage, which is an unsatisfactory situation for the protection of the threatened flora, threatened ecological community and other biodiversity values of the area and not supported by DBCA. Given the significant environmental values within the retained open space areas it is recommended that advice should be sought from DBCA during the preparation of the proposed SCMP.</p> <p>8. Bushfire Management. The Bushfire Management Plan prepared as part of the LSP lacks identified Asset Protection Zone setbacks from the vegetated open space areas to the residential development. It is difficult to fully assess how these proposed setbacks will impact the Environmental Conservation areas and proposed revegetation of linkages within open space. In the absence of a detailed Bushfire Management Plan, SCMP and associated revegetation strategy, DBCA is concerned mitigation of bushfire risks may result in adverse environmental impacts. DBCA does support the classification of a majority of the public open space areas displayed in the Concept Landscape Plan, as "Extreme" bushfire hazard level, which recognises that these areas, if not already containing remnant vegetation may be revegetated in the future. DBCA also supports the provision of a hard road edge to a majority of open space/ residential interfaces. There should be no indication that any significant fuel reduction measures or modification of permissible rehabilitation species within the proposed open space are necessary to meet the Building and Hazard Separation Zones required.</p> <p>9. Local Water Management Strategy and Foreshore Impacts. On review of the Local Water Management Strategy (LWMS) the Rivers and Estuaries Branch of DBCA provide the following comments predominately related to the impacts of the development on the Poison Gully Creepline, which bounds the development area and eventually flows into the Swan River. It should be noted that DBCA was not given the opportunity to review or comment on the District Water Management Strategy (DWMS) prepared for this site. DBCA requests that the LSP map should include the location of all stormwater management structures within the development including the location of proposed basins within open space areas and any proposed or existing stormwater outlets into Poison Gully Creek. The River and Estuaries Branch recommends the outlets are located away from the edge of the foreshore buffer with any treated stormwater allowed to flow across vegetated pathways to the creek. The conceptual details of the stormwater infrastructure should be included in the documents, consistent with guidelines for preparing an LWMS. In addition, the stormwater plan (figure 11) is considered unclear and difficult to interpret. A clearer plan should be included in the report, along with a map showing the proposed stormwater management infrastructure in relation to the 100 year floodway, wetland areas (including buffers), Bush Forever sites and the foreshore reserve. There are also</p>	<p>development. The strategy was not a wetland management plan; specific management plans were developed as a condition of subdivision in accordance with planning processes. The Strategy, rather, provided a benchmark and standards for more detailed management plans, to ensure consistency of efforts across fragmented landholdings in the development of individual Wetland Management Plans. This approach could be implied for the residential precinct.</p> <p>8. The BMP is a strategic level document, not a detailed level BMP as is required to support Structure Planning. We cannot confirm APZ widths/alignments at the LSP stage, particularly in the absence of detailed lot layout. The determination of APZs and their locations forms part of the BAL contour mapping exercise undertaken as part of a detailed subdivision stage BMP. Section 4.1.2 of the BMP however does specify the likely APZ setbacks that may need to be implemented adjacent to the various post-development vegetation extents. These will be confirmed at the subdivision stage and design will ensure that the appropriate setbacks are implemented to achieved BAL-29 or lower. Based on the current Concept Landscape Plan, Strategen has estimated with confidence the post-development extent of classified vegetation and we have undertaken a comprehensive analysis to ensure that suitably sized road frontages abut conservation POS to absorb APZ setbacks as required and mitigate the requirement for fuel reduction/modification within conservation POS. DBCA support for the hazard level mapping road edges at residential interfaces is noted.</p> <p>9. The LSP plan is intended as a guide for development and identification of water management infrastructure and strategies and not detailed stormwater design. Detailed stormwater design and Best Management Practices would typically be included within Urban Water Management Plan (UWMP). Consequently stormwater structures are not included on the LSP plan. These and the conceptual details of the stormwater infrastructure are provided in Tables 7 and 8 and Stormwater Plan (Figure 11). An amended version of Figure 11 will be provided in the revised LWMS. Stormwater structures and outlets will be located outside the designated foreshore area. The foreshore includes the 1 in 100 year flood area. All stormwater infrastructure is located outside wetland areas, Bush Forever sites and the foreshore reserve. The landscaping plan is conceptual and shows conceptual locations of basins (DB numbers). Where basins are underground, these will be planted in accordance with landscaping plans and UWMP(s).</p> <p>10. The use of Subsoil Drainage is not anticipated in the LSP residential area. As identified in Section 6.1, "Any subsoil drainage modelling shall consider the potential impact of subsoil drainage on any Environmentally Sensitive Areas (ESAs) and the need for treatment to remove nutrients from mobilised groundwater." The width of the Foreshore Reserve was approved in the DWMS and is considered adequate for the purposes of foreshore management and the large amount of land designated for conservation within the LSP area.</p> <p>11. As identified in the LWMS, storage locations and layouts are conceptual and will be reviewed at the UWMP stage. Major event basin(s) have been designed with a batter of 1 in 8, which is less steep than the 1 in 6 batter required by local government guidelines for public access. The underground storage tanks will be located below the basins and</p>
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	<p>identified inconsistencies between the landscape plan and stormwater plan with respect to the location of roadside swales, which should be rectified.</p> <p>10. While it appears that both the LSP and LWMS are not proposing subsoil drainage as groundwater is located well below ground level across most of the area, section 3.5.3 of the LWMS mentions the installation of subsoil drains. The LWMS should acknowledge that the water discharging from the subsoil drains will be treated prior to discharge to the receiving environment and space set aside for this purpose or alternatively should specifically state that subsoils are not required in Forrestfield North. It is noted that the District Structure Plan and DWMS set the initial parameters for the foreshore reserve widths along Poison Gully Creek, which were subsequently increased in the proposed LSP and LWMS. It appears however that portions of the allocated foreshore reserve remain less than 10 metres wide (from the top of the embankment). DBCA requests that the minimum width of the foreshore reserve be 30 metres, consistent with the Western Australian Planning Commission's public open space guidelines.</p> <p>11. The River and Estuaries Branch also has concerns regarding the below ground storage tanks and basins for the 1 in 5 and 1 in 100 ARI events. The conceptual shape of the basins in the stormwater plan show a steep-sided square design and it is unclear how the storage tanks are incorporated into the design. Further information related to the proposed design, size and form, of the basins and storage tanks, and confirmation of their proposed locations are needed. On review of the LWMS it is considered that the infrastructure may have a negative impact on the visual amenity of the area, particularly if located adjacent to the foreshore area.</p> <p>12. It is noted that Lot 10208 on Plan 13419 (Crown Reserve 37323), which is adjacent to the Metropolitan Region Scheme (MRS) reserve along Poison Gully Creek, is included in the Local Scheme Reserves as Local Open Space but not in the Metropolitan Region Scheme (MRS) as Parks and Recreation reserve. It is also not included in the LSP boundaries. It is recommended that if amendments to the MRS are proposed to include additional land identified in the LSP as foreshore reserve, this lot be included within the Parks and Recreation reserve to formalise its current use.</p> <p>13. Matters of National Environmental Significance. Due to the identification of areas of vegetation on site which align with the Commonwealth listed threatened ecological community 'Banksia Woodlands of the Swan Coastal Plain', presence of the threatened flora species <i>C. undulatum</i> and, the presence of identified foraging and potential breeding habitat for Carnaby's Black Cockatoo (<i>Calyptorhynchus latirostris</i>), Forest Red-tailed Black Cockatoo (<i>Calyptorhynchus banksii naso</i>) and Baudin's cockatoo (<i>Calyptorhynchus baudinii</i>), there is a recognised impact to threatened species and communities listed under State and Federal legislation. Consideration should therefore be given to the obligations for assessment of the proposal in accordance with the Wildlife Conservation Act 1950 and the Commonwealth Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act). Please be aware that the proponent(s) will have notification responsibilities under the EPBC Act and should contact the Commonwealth Department of Environment and Energy for further information on these responsibilities, prior to further planning stages.</p> <p>14. It is recommended that, as per the planning for the North Forrestfield area, any referral of this development in accordance with the EPBC Act should be strategic and not on an individual landowner basis.</p>	<p>will be covered with adequate soil to allow the growth of shallow rooted vegetation above the tank (i.e. they are effectively hidden). With these design aspects, the infrastructure will minimise impacts on visual amenity of the open space and foreshore.</p> <p>12. Noted.</p> <p>13. Noted and agreed. As discussed in Section 1.3.2 of the EAMS two EPBC approaches were discussed with Department of Premier and Cabinet, OEPA and DEE regarding EPBC Act referral and assessment. At that time, the Strategic Assessment of the Perth and Peel Region (SAPPR) was being undertaken which included the Forrestfield North residential precinct. Consultation with the above agencies indicated that the SAPPR process would suffice and that a separate strategic Assessment (for small fragmented project area) would not be support as it would be a duplication of the SAPPR process.</p> <p>14. Further to the comment above as of the 6 April 2018, the State Government suspended work and will be re-evaluating the SAPPR through an independent review. Recommendation: once the outcomes of the SAPPR review have been completed/concluded a decision on whether a strategic assessment for the residential precinct can be confirmed.</p>
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<p>28.</p>	<p>Department of Communities</p>	<p>Comments</p> <ol style="list-style-type: none"> 1. The Department of Communities (Communities) does not currently hold any land or housing assets in the Structure Plan Area, however the following comments are provided to assist the City with its consideration of the Structure Plan. 2. The site adjacent to the TOD Precinct of the Forrestfield North District Structure Plan (DSP) and it is understood that the Metronet team has provided input in preparation of the DSP and the current Draft Residential Precinct Structure Plan. 3. Communities supports housing being developed with whole-of-life consideration in terms of house design and neighbourhood design and supports the DSP providing for a range of residential densities throughout the area to facilitate diversity of housing types and sizes. The advertised Structure Plan, however, has a significantly reduced area proposed for high density residential land relative to the area shown on the DSP. Additionally, land on the north-east side of Sultana Road with is now indicated as Light Industrial land rather than Mixed-Use land that could accommodate residential development. 4. The reduced land area to develop housing and the reduction in residential densities may prevent the Structure Plan achieving an optimum housing outcome. Failure to provide a critical mass of residential population risks reducing the viability of commercial uses and the ability to efficiently provide and operate public transport, community facilities, amenities and services. Please ensure that the City considers carefully whether the proposed reduction in land available for housing and the reduction in housing density proposed are likely to adversely affect the State Government’s strategic housing and planning objectives. 5. The increased areas of Local Public Open Space proposed in the Structure Plan are acknowledged as beneficial to the amenity of the area. Retention of mature trees wherever possible and seeking a net gain of tree canopy is supported. As noted above, however, reduction in land available for residential development combined with reduced residential density may compromise the viability of providing serviced and employment in the area. 6. Communities would support the Structure Plan considering the interface between residential development areas and Public Open Space and commercial/light industrial areas. The City is requested to consider whole-of-life dwelling and neighbourhood design as part of the Structure Plan. 7. The City is encouraged to liaise with Communities throughout forthcoming planning and development stages. Communities looks forward to engaging with the City and other landowners within the area to achieve an inclusive and connected community at Forrestfield North. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. The Local Structure Plan (LSP) is considered to be consistent with the DSP. Predicted dwelling and population yields are similar to those predicted in the DSP when making assumptions on the yield from the Transit Oriented Development (TOD) Precinct. The modified LSP has removed the light industry zoning and has been replaced with medium/high density residential. 4. Noted, see 3. above. 5. Noted. The modified LSP has reduced the amount of local open space and replaced with developable land. 6. Noted. 7. Noted.
<p>29.</p>	<p>Department of Education</p>	<p>Comments</p> <ol style="list-style-type: none"> 1. Based upon the proposed residential yield of 6,409 dwellings (discounting single bedroom dwellings) the Department will require a primary school as identified within the Draft Local Structure Plan. 2. The 4 ha primary school site and shared public open space will assist in accommodating the anticipated large student yield from the residential development. 3. The larger school footprint is required to accommodate the student yield expected from development anticipated to be more than 540 students at full residential development. 4. The Department will also need to utilise the existing Edney Primary School to accommodate some of the expected student yield. The Department will need to adjust its current local intake area for that school to ensure continued viability and an equitable distribution of students. 5. It is expected that between the existing Edney Primary School and the proposed new primary school there will be sufficient capacity to accommodate the anticipated student yield from the development. 6. The Department will also need to carry out a due diligence site inspection through its appointed consultants to ensure that there is no impediment to build the primary school on this location. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted. 5. Noted. 6. Noted. 7. Noted.

		7. The Department notes the Sporting Precinct Preliminary Concept Plan and advises that further discussion would need to take place re the orientation of the school building footprint, shared parking and the interface with the shared oval at a convenient time into the future.	
30.	Department of Mines, Industry Regulation and Safety	<p>Support</p> <p>1. Non-objection.</p>	1. Noted.
31.	Department of Fire and Emergency Services	<p>Comments</p> <p>1. The Bushfire Management Plan has adequately identified issues arising from the Bushfire Hazard Level (BHL) assessment and considered how compliance with the bushfire protection criteria can be achieved at subsequent planning stages. However, it is unclear how the structure plan responds to two areas (see below plan) abutting areas of Extreme BHL as identified in the BMP.</p> <p>2. DFES supports the progression of the structure plan, provided modifications are made to ensure that "hazard separation" (in form of public roads, public open space etc) is annotated on the structure plan as indicated in the below mark-up to ensure that no residential zoned land is affected by BAL40 or BAL-FZ at subsequent planning stages.</p>	<p>1. This recommendation will be reviewed and addressed as part of the finalisation of the Bushfire Management Plan.</p> <p>2. Noted.</p>

<p>32.</p>	<p>METRONET</p>	<p>Comments</p> <p>1. Page vi, Paragraph 1: Please include reference to the interface between the residential/TOD precinct: <i>The delivery of an appropriate interface to the Forrestfield Station Transit Oriented Development to the west of the residential precinct.</i></p>	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. The Local Structure Plan (LSP) proposes that Cell based plans are required to be produced prior to development to inform the coordination of subdivision and development. 4. Noted.

		<ol style="list-style-type: none"> 2. Page 7, Point 12: This section could also require preparation of a delivery strategy that addresses a range of issues, including staging, land assembly, land acquisition etc. 3. Page 8, Point 5 (Local Development Plans): The LSP should not exclude the need for the preparation of local development plans. LDP's may be required around the future activity centre (community hub) or other areas of POS. 4. Page 38: It may be appropriate to add a new section here, potentially called <i>Other Planning Considerations – METRONET</i>. This would include a brief overview of the FAL project and expectation regarding the project. We can provide text if required. 5. Page 75: new dot points: <ul style="list-style-type: none"> • Please include reference to the interface between the residential/TOD precinct. Specifically the proposed activity centre which connects across Milner road into the TOD precinct. • Please include reference to the new train station which provides public transport access to residents of the residential precinct. 6. Page 83: All references to METRONET should be in capitals. 7. Page 84: New dot point: <ul style="list-style-type: none"> • Please include reference to the new train station which provides public transport access to residents of the residential precinct. 8. Page 93, 2.7.7.4: New text should be added noting the importance of providing pedestrian links to Forrestfield station. 9. Page 95: Plan should show continuation of pedestrian/cycling links through to TOD precinct (arrow) 10. Page 96, 2.7.7.5: New text should be added noting the importance of providing cycling links to Forrestfield station. Note should also be made regarding provision of bicycle parking at station for use by residents. 11. Page 96, 2.7.7.6: Please include reference to the new train station which provides public transport access to residents of the residential precinct. 12. Page 96, 2.7.7.7: Text should be amended to refer in general terms to a public transport authority park and ride facility being provided, with final parking bay numbers and location to be determined through further detailed planning and design 13. Page 97: Plan should be amended to remove 'proposed'. Station and associated facilities are now under construction. 14. Page 125: Need to confirm that the TOD precinct will have a residential interface to the community hub as indicated on the plan. 	<ol style="list-style-type: none"> 5. To be considered during the finalisation of the LSP. 6. Noted. 7. To be considered during the finalisation of the LSP. 8. To be considered during the finalisation of the LSP. 9. Pedestrian links through to TOD to be considered during preparation of the Transit Oriented Development (TOD) LSP. 10. To be considered during the finalisation of the LSP. 11. Noted. 12. To be considered during the finalisation of the LSP. 13. To be removed as part of finalising the LSP. 14. Noted.
<p>33.</p>	<p>Department of Water and Environmental Regulation</p>	<p>Comments</p> <ol style="list-style-type: none"> 1. The EPA recommended its decision and advice regarding Amendment 75, that LPS 3 Schedule 11 DA2 area and text provisions be modified to include requirements for future structure plans to retain declared rare flora, associated habitat, threatened fauna habitat, and low representation vegetation complexes for conservation. 2. The EPA concluded that the amendment can be managed to meet the EPA's environmental objectives, through the preparation of future local planning scheme provisions for structures plans to manage and protect flora and vegetation and terrestrial fauna values. 3. Representatives from DWER and DBCA provided extensive advice regarding the scale and widespread nature of the environmental values identified throughout the LSP area and provided indicative support for the environmental conservation areas mapped in the North Forrestfield Concept Plan, which appears to be consistent with the current draft LSP. 4. It is recognised that due to the existing rural residential landscape, retention and protection of all significant values would not be possible. The negotiated LSP design outcome, based on the previous consultation with relevant agencies, was considered the best planning and environmental outcome. 5. At this stage, specific mechanisms to retain, protect and manage the conservation areas have not been proposed. However, I note that the City proposes that the proposed environmental 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted and agreed. 5. A strategic CMP has been proposed and will be committed to once the LSP has been approved. Refer to Section 3.4.4 Table 18 of the EAMS. 6. Table 18, in the EAMS recommends that the Strategic Conservation Management Plan (CMP) be developed once the LSP has been approved. Essentially, the CMP would support the LSP, subsequent subdivisions within the residential would need demonstrate compliance with the CMP. Agreed, CMP to be prepared in consultation with DBCA. 7. Noted. Subsequent to this DWER has provided comments. The LWMS will be endorsed by DWER and the City prior to the LSP being finalised. 8. Noted. As discussed in Section 1.3.2 of the EAMS two EPBC approaches were discussed with Department of Premier and Cabinet, OEPA and DEE regarding EPBC Act referral and assessment. At that time, the Strategic Assessment of the Perth and Peel Region (SAPPPR) was being undertaken which included the Forrestfield North residential precinct.

		<p>conservation areas are acquired as a Parks and Recreation reserve by the State Government. The City will need to liaise with the Western Australian Planning Commission to determine the suitability of this option, and alternate mechanisms to protect and manage these areas.</p> <p>6. The LSP document states that the development of a Strategic Conservation Management Plan (SCMP) is proposed at the individual subdivision stages of the development. Given the significance of the environmental values of the LSP area, the protection and management of the conservation areas needs to occur as part of the current LSP; the management of these values should not be deferred to the subdivision stage of planning. The SCMP should be provided as part of the structure plan process to ensure that the values within the conservation and open space areas will be retained, protected and managed while allowing for restricted active and passive recreational facilities. Without this SCMP being provided at the structure plan stage, resolution of any identified issues would be deferred to the subdivision planning stage. Given the significant environmental values within the retained open space areas it is recommended that advice ne sought from the DBCA during the preparation of the proposed SCMP.</p> <p>7. Consistent with the Western Australian Planning Commission's Better Urban Water Management (BUWM) Policy (WAPC, Oct 2008) a Local Water Management Strategy (LWMS) should be prepared and approved, by DWER and the City of Kalamunda, to support the proposed Local Structure Plan. DWER notes that a LWMS has been drafted by Strategen Consultants to support the proposal. DWER has not yet commenced the assessment of this LWMS but will undertake assessment as soon as possible. Consistent with BUWM, the proposed Local Structure Plan should not be finalised until the LWMS has been endorsed by DWER and the City of Kalamunda.</p> <p>8. In addition, the City should contact the Commonwealth Department of the Environment and Energy for further information regarding the notification responsibilities for values protected under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). It is recommended that, as per the planning for the North Forrestfield area, any referral of this development in accordance with the EPBC Act should be strategic and not on an individual landowner basis.</p>	<p>Consultation with the above agencies indicated that the SAPPR process would suffice and that a separate strategic Assessment (for small fragmented project area) would not be support as it would be a duplication of the SAPPR process. Further to the comment above as of the 6 April 2018, the State Government suspended work and will be re-evaluating the SAPPR through an independent review.</p> <p>Recommendation: once the outcomes of the SAPPR review have been completed/concluded a decision on whether a strategic assessment for the residential precinct can be confirmed.</p>
<p>34.</p>	<p>Main Roads Western Australia</p>	<p>Comments and Objection</p> <p>1. Main Roads has now completed its assessment and advises that based on the Traffic Impact Assessment (TIA) report and associated traffic modelling submitted, Main Roads cannot support this Local Structure Plan at this stage until further traffic modelling work is undertaken and re-submitted for further review.</p> <p>2. Noise Attenuation. The Lloyd George Acoustics acoustic noise report dated 17 April 2017 (Reference 17064031-02) has now been assessed and Main Roads advises that it agrees with the report recommendation that as subdivision design progresses, a more detailed assessment will be necessary to determine appropriate levels of noise mitigation (noise walls, facade packages etc.). For any detailed noise assessments that the proponent or a developer conducts in the future as the subdivision design progresses, Main Roads Environment Branch recommends the following:</p> <ul style="list-style-type: none"> • Utilise the most recent traffic count data and future traffic modelling inputs available from Main Roads. • Detail the thickness of the proposed 4m noise wall in the acoustic noise report. In accordance with Section 5.3.2 of the Implementation Guidelines, noise walls should be at least 15 kg/m2 surface density. • Ensure notifications on titles are consistent with section 4.5 of SPP 5.4 Implementation Guidelines. <p>3. Vehicular Parking. KCTT is to consult with Council to confirm the parking requirements applied for the various land use types in accordance with the relevant planning schemes and reference documents are accurate.</p> <p>4. Calculation of Development Generated Trips. It is unclear why a lower trip generation rate has been used for the School land use type in the PM peak (0.15/student as opposed to 0.45/student in the AM peak). Please provide further explanatory comment. Local use reciprocity rates have</p>	<p>1. Noted. Traffic Modelling to be reviewed at the point when the Western Australian Planning Commission (WAPC) provides feedback on the Local Structure Plan (LSP)</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. The calculations were conducted with rates of 1.29 vpd per student and 0.5 vph per student in AM and PM peak respectively as it can be seen from the trip generation calculation table. The stated generation rate (0.15 and 0.45 vph) is a typographical error. These land uses will be developed within the Forrestfield North residential precinct. The majority of generated traffic will be from the residential precinct itself. This traffic was already accounted for in the residential traffic generation (as a social / recreation and education component), and if the reciprocity had not been applied, this traffic figure would be doubled. Also, the reciprocity accounts for the people from surrounding residential areas who are likely to walk or cycle to District Open Space.</p> <p>5. KCTT will provide a drawing with 7 external zones marked in the following revision of report/appendices. This will be completed in the context of LSP map changes and included in a schedule of modifications for the Traffic Impact Assessment (TIA).</p> <p>6. The Roe Hwy/Berkshire Rd will be completed and submitted in the next revision of the report. (internal decision was made to leave this out as</p>

	<p>been applied to adjust the trip generation rates of the Primary School, Community Hub, District Open Space land use types. No technical reference or justification has been provided to justify these rates. Please provide further explanatory comment.</p> <ol style="list-style-type: none"> 5. SIDRA intersection analysis – section 2 – Traffic Generation and Distribution Analysis. The 7 external zones defined for traffic distribution are unclear. They should be conveyed visually with respect to the LSP area. Without clarity on these external, the breakdown of traffic distribution across these zones cannot be properly reviewed. Please providing an appropriate supporting plan. 6. SIDRA Intersection Analysis – Section 4 – Summary of Results. The Roe Hwy/Berkshire Road interchange has not been modelled. This is a critical omission that this interchange will be the closest and therefore the primary full-movement point of access into Roe Hwy and the wider metropolitan state road network for the LSP area. 7. Council to be aware that a cursory review of the result summary provided (without interrogating modelling inputs) indicates that in the future 2050 scenarios the networks outlined below will operate at a poorer level of service and may require remediation works in the future. 8. Traffic on Maida Vale WB will be operating at a LOS of E at the Maida Vale Road/Milner Road roundabout in the 2050 PM scenario, with queues having a 95th percentile length of 540m (pg 21). This is equivalent to queues extending as far back past Littlefield Road. Additional consideration may need to be given ultimate configuration of Maida Vale Road in order for it to operate at a better level of service, especially if there is the risk of congestion on Maida Vale Rd having flow-on effect on the Roe Hwy interchange (some 770m from Milner Rd). Traffic on Berkshire Rd WB will be operating at a LOS of F at the Berkshire Rd/Milner Rd/Dundas Rd roundabout in both 2050 peak scenarios, with 95th percentile queues reaching 740m and 1440m in the AM and PM peaks respectively (pg. 38-39). At 1440m, the queue will be extending past the Roe Hwy/Berkshire Rd interchange. Additional consideration therefore needs to be given to the ultimate configuration of Berkshire Rd in order for it to operate at a better letter of service, especially since the congestion on Berkshire Rd is modelled to extend as far back as the Roe Hwy interchange. While KCTT’s proposal for an incremental approach to upgrading the intersection as and when required by traffic demand is acceptable, it should still demonstrate a suggested ultimate configuration that would be able to adequately service the forecasted 2050 volumes. 9. Traffic Modelling Report. Main Roads does not support Paramics models, accepting models built in either Aimsun or VISSIM only. 10. SIDRA Model. The consultant is advised to refer to Main Roads’ modelling guidelines for detailed guidance on Main Roads’ requirements for modelling submissions. Given that this review is concerned with the operational implications of the development for the state road network, only the Roe Hwy/Maida Vale Rd interchange model has been reviewed. However it is quite likely that comments highlighted for this model will be applicable to the other models of intersections on the local road network. 11. SIDRA Model. Movement Definitions. It is unclear on the underlying reasoning for a separate ‘Development Light Vehicle’ movement class to be defined. Further explanatory comment is required. 12. The ‘Bus’ movement class defined for two Maida Vale roundabouts seems redundant, with zero bus volumes in all scenarios. 13. The default ‘Heavy Vehicles’ movement class used does not adequately reflect the heavy vehicle traffic at this interchange. The smallest Austroads HV class, Class 3, has a vehicle length of 12.5m long, so the 10m vehicle length adopted for the SIDRA default ‘Heavy Vehicles’ is an underestimation. As the Class 3 Heavy Vehicle is the predominant Heavy Vehicle type (9.2% of Roe Hwy North bound off-ramp and 14.2% for Roe Hwy South bound on-ramp, based on MRWA Traffic Map data), the Heavy Vehicle movement class used should at least reflect that type of vehicle. 14. SIDRA Model. Roundabouts. KCTT is to seek further advice from the City of Kalamunda on the precise design configuration of the roundabouts to be built on Maida Vale Road. Any necessary amendments to the model to better represent the design should be made accordingly. 	<p>this intersection was analysed in District Structure Plan (DSP) reporting while LSP reduced the traffic significantly). This will be completed in the context of LSP map changes and included in a schedule of modifications for the Traffic Impact Assessment.</p> <ol style="list-style-type: none"> 7. Noted. 8. As stated in the summary of the results, the volumes for 2050 should be taken with extreme caution. With the state-of-art new technology (autonomous vehicles, 'smart' infrastructure - Vehicle to vehicle and vehicle to infrastructure communication technology etc.) expected to take over the entire network, it is not considered appropriate to predict traffic volumes in such long term, as there is a potential risk of over-sizing the future road network and intersections. As the network and the maximum yields will be revisited the models will be updated to reflect this. 9. The intention to model in paramics was discussed with MRWA at the initial meeting. Modelling guidelines were published several months after the completion of TIA. Noted for work on future projects. 10. Noted. Main Roads Modelling Guidelines were published almost 3 months after the latest iteration of the report was submitted. This will be completed in the context of LSP map changes and included in a schedule of modifications for the Traffic Impact Assessment. The City may consider the revised modelling at the request of the WAPC. 11. The separate 'Development Light Vehicle' movement class represents the traffic generated by the Forrestfield North precincts. This allows to examine the impact of growing passing traffic on the road network post development completion in the "design life" option. 12. It was unintentionally omitted between two revisions. Will be added in the following revision. This will be completed in the context of LSP map changes and included in a schedule of modifications for the Traffic Impact Assessment. 13. Heavy vehicles in modelling will be set up as per Main Roads (MRWA) modelling guidelines (which were published after the completion of the report). This will be completed in the context of LSP map changes and included in a schedule of modifications for the Traffic Impact Assessment. 14. Noted. 15. KCTT have utilised the ROM24 2031 daily volumes to create the demand matrix and distribute the traffic between the 7 external zones. The traffic demands between any two zones were estimated and calibrated processing the Paramics models, until they reflected the ROM24 data as closely as possible. Forrestfield North traffic was processed separately in the paramics model, and the turn counts were derived from this model through Analyser component of Paramics and used for Sidra models. Some of the traffic volumes were omitted from the presentation for sake of clarity. As many traffic counts as possible will be included.
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		15. SIDRA Model. Volumes. It is unclear how the projected background/base peak period volumes have been derived from the ROM24 2031 daily volumes. The derivation process needs to be outlined. It is also unclear how the percentages for the 'Development Light Vehicle' movement class have been derived. There are considerable midblock traffic volumes gains and losses between the three sites comprising the network model. These midblock in/outflows are unrealistic given that there cannot possibly be any traffic sinks/sources occurring within the interchange, and thus must be resolved in further detail.	
35.	Public Transport Authority of Western Australia	<p>Comments</p> <ol style="list-style-type: none"> 1. The noise monitoring/modelling does not factor in the new Forrestfield Station. Information on the potential noise emissions from the operation of the new station is limited at this stage. Our contractor is yet to do a thorough assessment, and this is currently being worked through. Therefore, we would not be able to guarantee residents in that new development would hear train operating at that station. 2. It is worth noting that there will be an increase in bus movements feeding into the new Forrestfield Station. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted.
36.	Water Corporation	<p>Comments</p> <ol style="list-style-type: none"> 1. The Water Corporation has adopted conceptual water and wastewater infrastructure planning for the area. The planning can be further revised and modified as needed if the land use and dwelling yield information for the area changes. The Water Corporation's infrastructure planning may be varied or staged by developers in consultation with the Water Corporation. 2. Because of the east to west slope and the fragmented land ownership through the area, it is likely that wastewater servicing of the area will be difficult to stage with temporary infrastructure or pump stations. Subdivision and development should preferably commence adjoining the existing gravity sewerage network towards the western side of the subject land and proceed in an orderly and frontal manner in a south-easterly direction. 3. As indicated in the Infrastructure Servicing Report (KCTT) attached to the structure plan, the Water Corporation intends to revise water headworks and reticulation planning for this area following the final adoption of structure plans over the area. 4. The Corporation has recently completed a comprehensive review of the Gooseberry Hill Sewer District conceptual wastewater planning, which include the Forrestfield North area. A copy of the revised wastewater planning has recently been forwarded to KCTT consultants for consideration and inclusion in the servicing report as necessary. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted.