CITY OF ARMADALE

AGENDA

OF **DEVELOPMENT SERVICES COMMITTEE** TO BE HELD IN THE **COMMITTEE ROOM**, ADMINISTRATION CENTRE, 7 ORCHARD AVENUE, ARMADALE ON **MONDAY, 16 FEBRUARY 2026 AT 7:00PM.**

OFFICIAL OPENING & ACKNOWLEDGEMENT OF COUNTRY

PRESENT:

Dr C M Wielinga	(Chair)
Cr S J Mosey	(Deputy Chair)
Mayor R Butterfield	
Cr J Keogh	
Cr L Sargeson	
Cr A Singh	
Cr G J Smith	
Cr T Thomas	

APOLOGIES:

OBSERVERS:

IN ATTENDANCE:

PUBLIC:

DISCLAIMER

The Disclaimer for protecting Councillors and staff from liability of information and advice given at Committee meetings to be read.

DECLARATION OF MEMBERS' INTERESTS

QUESTION TIME

Public Question Time is allocated for the asking of and responding to questions raised by members of the public.

Minimum time to be provided – 15 minutes (unless not required)
Policy and Management Practice EM 6 – Public Question Time has been adopted by Council to ensure the orderly conduct of Public Question time and a copy of this procedure can be found at http://www.armadale.wa.gov.au/PolicyManual

It is also available in the public gallery.

The public's cooperation in this regard will be appreciated.

DEPUTATION

CONFIRMATION OF MINUTES

RECOMMEND

Minutes of the Development Services Committee Meeting held on 8 December 2025 be confirmed.

ITEMS REFERRED FROM INFORMATION BULLETIN - ISSUE 1 - FEBRUARY 2026

If any of the items listed in the Information Bulletin - Issue 1 – December 2025 and January 2026 require clarification or a report for a decision of Council, this item to be raised for discussion at this juncture.

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16 FEBRUARY 2026

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1.1 - PETITION - DUST POLLUTION - STURROCK CLOSE AND LANNAM ROAD, HILBERT

WARD	:	RANFORD
FILE No.	:	M/768/25
DATE	:	11 February 2026
REF	:	DD
RESPONSIBLE MANAGER	:	Executive Director Development Services

In Brief:

- A petition was received on 25 November 2025, with 21 signatories concerning the ongoing sand drift and dust pollution originating from subdivision works.
- Recommend that Council acknowledge receipt of the petition as the City has undertaken appropriate enforcement actions with the contractors to achieve compliance.

Tabled Items

Nil

Decision Type

☒ **Legislative** The decision relates to general local government legislative functions such as adopting/changing local laws, town planning schemes, rates exemptions, City policies and delegations etc.

☐ **Executive** The decision relates to the direction setting and oversight role of Council.

☐ **Quasi-judicial** The decision directly affects a person's rights or interests and requires Councillors at the time of making the decision to adhere to the principles of natural justice.

Officer Interest Declaration

Nil

Strategic Implications

Strategy Community Plan 2026-2035

2.1 Protection and restoration of the natural environment

2.1.3 Minimise impacts on air quality throughout the City

Legal Implications

Local Government Act 1995 – Part 3, Division 3, Subdivision 2, Section 3.25 Notices requiring certain things to be done by owner or occupier of land.

Council Policy/Local Law Implications

City of Armadale Environment, Animal and Nuisance Local Law 2002

Budget/Financial Implications

Nil

Consultation

Nil

BACKGROUND

At the Council meeting on 24 November 2025, a Petition signed by 21 residents was tabled, the prayer of which reads:

"We, the undersigned residents of Sturrock Close and Lannam Road, Hilbert, respectfully request the City of Armadale urgent intervention regarding ongoing and severe dust and windblow sand pollution originating from the Stockland development being carried out by Wormall Civil. We seek an investigation into compliance breaches and fair compensation for affected residents."

COMMENT

The Western Australian Planning Commission has granted subdivision approval for the land to subdivided into residential lots. The subdivision works in Hilbert involves large-scale earthworks and civil works, which can generate dust and wind-blown sand, particularly during dry and windy seasonal conditions.

Under the *City's Environment, Animal and Nuisance Local Law 2002,* an owner or occupier must submit a Dust Management Plan (DMP) *"when on any land any earthworks, clearing of scrub, trees or overgrowth or any other site works likely to generate dust are intended, whether or not that work or those works are subject to a development or subdivision approval"* A DMP is required to be in place prior to commencement of earthworks to ensure contractors implement appropriate dust-control measures.

Wormall Civil is the contractor undertaking the works on behalf of Stockland, and has submitted a DMP for each stage of the subdivision for approval.

Since works commenced, the City has received multiple dust-related complaints from nearby residents. Residents have reported:

- Significant dust and sand drift entering homes, outdoor areas, pools, and vehicles.
- Limited or ineffective dust suppression by contractors.
- Concerns that the approved DMP is not being adequately implemented.
- Adverse health impacts, loss of residential amenity, and increased cleaning and maintenance costs.
- Requests for urgent intervention from the City.

The *City's Environment, Animal and Nuisance Local Law 2002* require an owner or occupier to comply with provisions of their approved DMP and to take all practicable measures to prevent sand or dust on that site from being released or escaping, whether by means of wind, water or any other means.

For the City to take enforcement action under the Local Law, sufficient evidence must be obtained to demonstrate that dust or sand is emanating from the site. This can be challenging in circumstances where there may be multiple potential sources of dust or sand in the area.

In relation to the petition's request for compensation for residents, the City suggests affected residents to engage directly with Wormall Civil and Stockland to discuss any potential costs from the impacts. The City will, however, continue to work with Wormall Civil and

Stockland to ensure residents' concerns are addressed and that appropriate remedial works are undertaken where required.

City response and compliance actions

Upon receiving complaints, the City undertakes a range of compliance and enforcement activities. These actions have been applied in this matter and include the following:

Site Inspections

City Environmental Health Officers have attended the site and surrounding residential areas, on multiple occasions over the period to assess visible dust, verify prevailing weather conditions and check whether dust control measures (e.g. watering, stabilisation, wind fencing) were in place and operating effectively.

Review of DMP and Compliance

The approved DMP has been reviewed and assessed against onsite practices, including:

- Watering frequency and availability of water carts;
- Stockpile stabilisation measures;
- Application of dust suppressants such as Dustex or hydromulch;
- Wind forecasting and monitoring procedures; and
- Installation and maintenance of wind fencing.

Any deficiencies are raised by the City's Environmental Health Officers directly with the site supervisor for rectification.

Contractor/Developer Engagement

City officers have formally engaged Wormall Civil and Stockland to:

- Communicate resident concerns;
- Reinforce compliance obligations under the Local Law and approved DMP; and
- Request immediate corrective actions where required.

These actions may include increasing water truck rotations, installing wind fencing, temporarily ceasing works during high-wind conditions, stabilising exposed sand, and removing of sand from surrounding roads, verges and drainage infrastructure.

Monitoring and Enforcement

Where evidence supports non-compliance or inadequate dust management, the City may implement escalating enforcement measures, including:

- Issuing written directions or requiring additional mitigation measures;
- Formal warning letters;
- Stop Work Notices; and
- Infringement Notices.

These actions continue until compliance is achieved. Where necessary, legal proceedings may be initiated.

ANALYSIS

On 27 November 2025, the City issued a formal direction to Wormall Civil requiring the installation of boundary wind fencing and implementation of effective dust and sand suppression measures by 3 December 2025, with advice that a Stop Works Notice may be issued if compliance was not achieved.

While the City confirmed on 3 December 2025 that measures had been implemented and did not issue a Stop Works Notice at that time, ongoing sand drift beyond the site boundary and non-compliance with the approved Dust Management Plan resulted in two infringement notices being issued by the City.

Further inspections on 12 and 14 December 2025, identified ongoing dust and sand leaving the site. As a result, a Stop Works Notice was issued on 17 December 2025 requiring all works to cease until adequate dust mitigation measures and onsite air quality monitoring were implemented.

The City met onsite with representatives from Wormall Civil and Stockland on 23 December 2025 and again on 7 January 2026 to review compliance and assess additional dust control measures.

On 9 January 2026, the City lifted the Stop Works Notice and permitted works to recommence following the implementation of additional dust mitigation measures, including enhanced dust suppression, boundary controls, hydromulching, physical barriers, ongoing maintenance, air quality monitoring and resident notification.

On 15 January 2026, Stockland hand delivered letters to surrounding residents providing contact details for their customer care team should residents need to raise any further concerns. Stockland has advised that resident enquiries received via its customer care team will be acknowledged within 24 hours and referred to the relevant development and project managers for investigation. Where required, remedial actions will be undertaken, and outcomes communicated back to residents. Stockland has further advised that its customer care team has been briefed to manage enquiries relating to this matter.

The City’s Health Services will continue to inspect the site works and require the site works to be appropriately managed in terms of the City’s Local Law.

CONCLUSION

The City has undertaken appropriate enforcement action to achieve compliance, with the Local Law and will continue to inspect the works to ensure the contractor complies. It is recommended that the petition organiser be advised of the investigation and actions undertaken by the City.

RECOMMEND

That Council:

1. **Acknowledge receipt of the petition and note the investigation and actions undertaken to achieve compliance with the City's *Environment, Animal and Nuisance Local Law 2002*.**

2. **Advise the organiser of the petition of the above.**

ATTACHMENTS
There are no attachments for this report.

2.1 - DWA APPLICATION REFERRAL - SIXTY-FIVE (65) MULTIPLE DWELLINGS AND PUBLIC OPEN SPACE

WARD	:	ALL
FILE No.	:	M/8/26
APPLN NO.	:	37.2025.184.1
DATE	:	11 February 2026
REF	:	KK/SW
RESPONSIBLE MANAGER	:	Executive Director Development Services
APPLICANT	:	Planning Solutions (DevelopmentWA)
LANDOWNER	:	State of WA
SUBJECT LAND	:	Property size 3.227 ha (total)
ZONING ARS2	:	Precinct 9 – Kelmscott Town Centre

In Brief:

- The City received a development application referral from DevelopmentWA (DWA) for 65 Multiple Dwellings and Public Open Space, beside Kelmscott Train Station.
- This is a Housing Australia Future Fund (HAFF) project. The subject site is one of 14 projects in Western Australia that have been supported in Round 1 of HAFF and is to be delivered by DWA.
- The development site will be created via lot rationalisation/ boundary realignment which incorporates two Class C reserves that were vested in the City, (formerly Kelmscott Library and formerly Kelmscott Infant Health Clinic).
- DWA is the Planning Authority that will determine this development application.
- The City's role as referral authority is to provide its recommendation to DWA on the development application.
- Recommend that the Council support the application subject to appropriate additional recommendations and conditions.

Tabled Items

Nil

Decision Type

☐ **Legislative** The decision relates to general local government legislative functions such as adopting/changing local laws, town planning schemes, rates exemptions, City policies and delegations etc.

☐ **Executive** The decision relates to the direction setting and oversight role of Council.

☒ **Quasi-judicial** The decision directly affects a person's rights or interests and requires Councillors at the time of making the decision to adhere to the principles of natural justice.

Officer Interest Declaration

Nil

Strategic Implications

1.3.1 Provide facilities and services to meet the growth demands and diverse needs of the wider Armadale community.
2.2.1 Focus on achieving high streetscape amenity in new developments.
2.2.2 Improve public realm for shaded streetscapes, civic places and open spaces.
2.5.2 Seek tree retention in new developments.
3.1.1 Facilitate vibrant and prosperous centres throughout the City.

Legal Implications

- *Metropolitan Redevelopment Authority Act 2011;*
- *Metropolitan Redevelopment Authority Regulations 2011; and*
- *Armadale Redevelopment Scheme No.2 (ARS2)*

Council Policy/Local Law Implications

N/A

Budget/Financial Implications

Subsequent land development generates service demand, and capital and operational costs for new/ upgraded infrastructure/ local facilities.

A Western Australian local government's ability to impose rates, and any exemptions to rates, arise under the *Local Government Act 1995*. The exemption potentially relating to Community Housing Providers' (CHPs) is provided for by sub-section 6.26(2)(g), which states that land used exclusively for charitable purpose is not rateable. DWA has indicated that the CHP is likely to seek an exemption.

Consultation

On 24 November 2025, DWA conducted a Councillor briefing for the proposed project funding and an overview of Housing Australia Future Fund (HAFF) practices.

DevelopmentWA have advised they will conduct public consultation as follows:-

- Site Notice erected on the subject site;
- 'Drop-In' information day beside the subject site, in Kelmscott Library;
- Letters posted to all properties within a 200m radius of the subject site;
- Details of the development advertised on the DevelopmentWA website; and
- A notice in the Examiner newspaper scheduled for the 5 February 2026.

Public consultation by DWA is scheduled to commence on the 30 January 2026 and close on the 21 February 2026. The DWA 'Drop-In' information day is scheduled for the 14 February 2026.

BACKGROUND

Site History and Context

The subject site is located between the Kelmscott Train Station and Albany Highway within the Kelmscott District Centre. The site is bound by Albany Highway to the east, Streich Avenue to the north and west, and existing commercial development to the south. The subject site is near to Stargate Shopping Centre and Kelmscott Village Shopping Centre.

The site historically housed the Kelmscott Library (prior to its relocation to the land adjoining Stargate Shopping Centre) and an Infant Health Clinic. Following the demolition of both buildings in the mid 2000's, the sites have remained vacant, except for their temporary use for informal car parking as a site compound to facilitate the now completed Denny Avenue Level Crossing Project works and measures to protect the significant trees on the Reserves by the City.

Land Tenure

The subject site comprises of the following existing land parcels:

Lot Details	Reserve No.	Area	Management Body	Management Order Purpose
Lot 818 Streich Avenue	R22555 (Class C)	2,100sqms	Public Transport Authority	Railways
Lot 1751 Albany Highway	R25940 (Class C)	472sqms	City of Armadale	Formerly Kelmscott Library
Lot 2821 Albany Highway	R22186 (Class C)	655sqms	City of Armadale	Formerly Kelmscott Infant Health Clinic

Reserves 22186 and 25940 are Crown Reserves and were previously managed by the City of Armadale for the purposes of an Infant Health Clinic and a library respectively (total area 1,127m^2).

The Management Order for Reserve 22186 included a condition that requires '*that the Red Gum (marri) trees on the Reserve must be preserved*'. This Management Order dates from 1940 and is unique, with such a mechanism rarely applied to Management Orders. The City has continually managed these trees in the context of their significance including advocating for their protection over an extended period.

Council received a request from Department of Planning, Lands and Heritage (DPLH) for the revocation of Management orders for the former Kelmscott Library and Infant Health Centre Reserves No.22186 and 25940. The request also included the dedication of a newly constructed section of Streich Avenue. The matter initially arose from a request from DPLH for purposes of facilitating the redevelopment of these sites as part of the State Government's Housing Diversity Pipeline initiative.

In response to a request from DPLH, in October 2023 (D31/10/23), Council resolved to request the Minister of Lands to revoke management orders for Reserves No.22186 and No.25940, subject to four specific trees and existing shrubs abutting the southern boundary

being retained in both reserves and the balance of the reserves being included in the redevelopment site.

The most relevant parts of Council's decision includes the following:

1. *Requests the Minister for Lands revoke the current management orders for Reserve No.22186 (Lot 1092) and Reserve No.25940 Albany Highway, Kelmscott (Lot 1751) pursuant to Section 50 (1a) of the Land Administration Act 1997 subject to: a) Specific trees shall be retained in the Crown Reserve and the balance of the Reserves be included in the land sale.*

……

5. *Advise the Department of Planning, Lands and Heritage, PTA and DevelopmentWA that in addition to Condition 1 above the City is seeking the retention of Tree No's 4, 5, 6, 8 and the existing shrubs abutting the southern boundary of the two Reserves No.22186 (Lot 1092) and Reserve No.25940 (Lot 1751) Albany Highway, Kelmscott.*

DPLH and DWA are now concurrently progressing the amalgamation and boundary realignment of these existing three lots, into two lots to facilitate the proposed development and Public Open Space. In this regard the Crown Reserves will be reduced from 1,127sqms to 837sqms under this development proposal, however the new POS Reserve will protect more trees.

As part of this development, the City will have the opportunity to advocate for all existing trees within the realigned and landscaped POS to be retained and protected. This is inclusive of the three Marri trees protected under the previous Management Order and the additional four trees identified in the 2023 Council resolution for further protection.

Only two existing trees are proposed for removal within all three combined lots and this is due to their location within the future on-site car park and due to their health. The shrubs along the southern reserve boundaries are also proposed for removal. Their removal has been supported by the applicant's Arborist Report (see Attachments).

Housing Diversity

The Housing Australia Future Fund (HAFF) is a Federal Government initiative to improve housing outcomes and supports meeting both State and Federal Government Housing targets. The subject site is one of 14 projects in Western Australia that have been supported in Round 1 of HAFF and is to be delivered by DWA. The 14 projects will create 1,145 new dwellings in well-connected, high demand areas, including METRONET station precincts.

All projects are:

- Build-to rent, 1 and 2-bedroom apartments with communal areas and other amenities;
- Architecturally designed and subject to formal Design Review in partnership with the Office of the Government Architect;
- Minimum of 'Silver Liveable' accessibility and 7-stars in the Nationwide House Energy Rating Scheme (NatHERS); and
- Including an average mix of 80% affordable and 20% social housing tenants.

Completed developments are to be sold in freehold to 'Community Housing Providers' (CHPs) for ongoing tenant selection, management and support, building/ site operations and maintenance. Selected CHPs benefit from 25 years of operational HAFF payments.

The general approach to parking includes at grade on-site design and active management by CHPs. Generally, car parking rates tend to be less than that normally required under State Planning Policy 7.3 (SPP 7.3) – Residential Design Codes (Volume 2). DWA has advised that this is due to the accommodation on offer and experiences from similar developments in the eastern states of Australia.

DETAILS OF PROPOSAL

In summary the proposed development includes the following:

- 6-storey residential complex, with an overall height from ground floor to top of parapet of 22.1m;
- A total of 65 dwellings (15 social & 50 affordable) comprising:
  - 15 x 1 bedroom (social dwellings);
  - 16 x 1 bedroom (affordable dwellings);
  - 34 x 2 bedroom (affordable dwellings);
  - Ground floor CHP Office, community room, residents lounge, lobby and service areas;
- 39 car bays, inclusive of 2 visitor bays;
- 5 motorcycle bays and 56 bicycle racks;
- 837sqms of landscaped public open space (pocket park), inclusive of the retention of existing mature trees; and
- Amalgamation and boundary realignment of the existing three lots associated with the overall subject site, into one lot to facilitate the proposed development/Reserves and a Crown Reserve for Public Open Space, subject to DPLH final approval.

It is noted that the proposed POS is a rationalisation of existing Crown Reserves, therefore the POS is not entirely a new POS area. The Landscape Design plan includes the landscape strip on the KFC site and co-ordination of works would need to be coordinated with the landowner.

COMMENT

Normalisation

The subject site is within DWA's Kelmscott Redevelopment Precinct. DWA are currently fully responsible for planning control over the subject site under its legislation and scheme.

Council resolved at its meeting held in April 2021 to support normalisation of the precinct back to the City's planning control, subject to conditions. The City also initiated, advertised and then adopted Scheme Amendment No.112 in November 2021 to bring the DWA's Precinct into the City's Town Planning Scheme. The amendment was forwarded to the Western Australian Planning Commission (WAPC) for its recommendation to the Minister of Planning for final approval. A decision on Amendment No.112 has not been made to date by the WAPC/Minister. DWA have previously advised the City that normalisation of the Precinct currently remains on hold.

Draft Kelmscott District Centre Structure Plan

Since 2021, the City has progressed the preparation of the Kelmscott District Centre Precinct Structure Plan (Precinct SP) to guide revitalisation and urban renewal in the Kelmscott District Centre and meet State Government objectives for high quality precinct design, as per

the WAPC's State Planning Policy 7.2 Precinct Design. The subject site is included in the draft Precinct SP.

At its 2023 February Council meeting, Council considered public submissions on the advertised Precinct SP and recommended that the WAPC grant approval, subject to modifications. The WAPC has sought deferral of the consideration of the Precinct SP, pending the City initiating the related Scheme Amendment. The City is preparing a report on the WAPC's requested modifications to the Scheme Amendment.

Planning Framework
The following DWA and State documents are relevant to this application:

- The Armadale Redevelopment Scheme No.2 (ARS2);
- The Kelmscott Town Centre Design Guidelines (2007).
  (*These guidelines provide some limited guidance on development standards such as building height, setbacks and land-use. The proponent has advised that these guidelines are generally outdated*);
- DWA Policies:
  - Development Policy 3 (DP 3) – Sound and Vibration Attenuation;
  - Development Policy 4 (DP 4) – Providing Public Art; and
  - Development Policy 9 (DP 9) – Affordable and Diverse Housing.
- State Planning Framework & State Policies:
  - Perth and Peel @3.5million;
  - State Planning Policy 4.2 (SPP 4.2) – Activity Centres for Perth and Peel;
  - State Planning Policy 5.4 (SPP 5.4) – Road and Rail Noise;
  - State Planning Policy 7.0 (SPP 7.0) – Design of the Built Environment; and
  - State Planning Policy 7.3 (SPP 7.3) – Residential Design Codes (Volume 2).
- Local Planning Framework (Non-statutory in DWA areas):
  - Draft Kelmscott District Centre Structure Plan (Precinct SP); and
  - Draft Kelmscott District Centre Public Realm Strategy (Public Realm Study)
  - Amendment No.112.

Design Review
DWA completed its own internal Design Review in partnership with the Office of the Government Architect. DWA has provided a copy of the second Design Review report dated 10 November 2025 and the applicant's response to this advice. Both documents can be reviewed in the advertised documents on the DWA website.

In summary, the design review advice indicates support for the proposal meeting all 10 design principles, as outlined in SPP 7.0. The six-storey building height was supported and the building scale and articulation towards the corner of Albany Highway/ Streich Avenue was seen as a positive outcome. The creation of the Public Open Space (pocket park) and retention of all existing mature trees was supported by the Panel.

The review concluded that opportunities remain to improve the scheme with added landscaping to the on-site car park, integration of public art within the design, finalisation of materials and colour schemes and the further development of solar shading devices. It also highlighted that opportunities exist for some north-facing apartments to achieve cross ventilation through the open-air circulation zone, provided that privacy is maintained.

The applicant's response included:

1) That permeable paving has been included in the car bay area within the car park to reduce the amount of hardscape.
2) Awnings have been provided to windows on the eastern, northern and western facades.
3) North-facing windows have a horizontal awning and east/west facing windows have both horizontal and vertical awnings to improve solar shading and provide a point of difference to each façade.
4) That opportunities for additional openings to the corridor side of the dwellings is to be explored during the design development phase in conjunction with the construction methodology and fire protection strategies.
5) The public art strategy will be developed as part of the broader public art strategy across the HAFF projects. The artwork is intended to contribute to the quality and experience of the broader station plaza.

Development Control Unit (DCU)

The application was referred internally to the City's Departments, with the following notable comments being provided:

Internal Section	Summary Comments
Subdivisions	The proposed resident to car bay ratio is considered inadequate and will likely put extra strain on existing car parking provisions in the vicinity.
Building	Advice Note required regarding the dividing wall between the balconies of two apartments on the first floor (Dwelling Type 2A) that face Albany Highway. Plans do not detail type and height of the separating wall between both balconies. The dividing wall must comply with the Building Codes Australia.
Parks	A detailed landscape plan clearly showing existing vegetation, trees to be retained and any proposed for removal. Tree Report intentions not clearly expressed on drawing set.
Environment	Request for a construction stage detailed Tree Protection Plan (TPP) and Construction and Environmental Management Plan (CEMP). The submission and approval of these could be a condition of the approval.

ANALYSIS

The proposal has been assessed against the relevant planning framework, as identified within the Planning Framework section of this report.

The following matters have been identified as key considerations of the proposal:

State Planning Framework
Perth and Peel @3.5million seeks to provide infill development within established urban areas. The framework includes a target for the City of Armadale to increase its existing housing stock to 15,020 by 2050. SPP 4.2 states that District Centres with a rail station should be a focus for medium and high-density housing and employment growth. The proposal is consistent with these objectives.

Land Use
Armadale Redevelopment Scheme No.2

The subject site is located within 'Precinct 9' of ARS2. Residential land uses are a 'Preferred' land use within this precinct. The proposed 'Multiple Dwelling' development can therefore be considered by DWA at this location.

It is noted that the City's Precinct SP identifies the subject lot as a 'Mixed Use Retail Core' land use and this zone would allow for a 'Multiple Dwelling' residential development at the R-AC3 density coding.

Built Form, Scale & Aesthetics
Building Height

The Kelmscott Town Centre Precinct Design Guidelines promote a 3-storey maximum building height on the property line. The guidelines also state that the building height is at the discretion of DWA.

The subject site is strategically located within Kelmscott District Centre and near Kelmscott Train Station. The proposed building height of six storeys represents a mid-rise urban centre development that would typically align to the R-AC3 coding under the R-Codes (Volume 2).

It should be noted that the draft City's Precinct SP identifies the site for a 'Landmark Building' and allows for a six-storey building height on this subject lot. The density of the development proposed is consistent with the R-AC3 zoning envisaged for the site under the draft Precinct SP.

The six-storey building height is supported by the City given its urban infill targets set by Perth and Peel @3.5million and the strategic location of the subject site within Kelmscott District Centre, and Kelmscott Train Station to progress transit orientated development.

Street Setbacks
Ground Floor

The Kelmscott Town Centre Precinct Design Guidelines promote commercial active uses at street level. Setbacks permitted for commercial uses at ground level are nil.

The ground floor setbacks vary throughout the development via building articulation. Nil setbacks prevail to Albany Highway and the corner of Albany Highway/ Streich Avenue. Setbacks to Streich Avenue and the rear of the site gradually increase where street activation is reduced.

It should be noted that the City's draft Precinct SP is envisaging ground floor podium setbacks to Albany Highway to be partly 4m for the subject site. At the corner of Streich Avenue and Albany Highway these ground floor setbacks will be subject to a Local Development Plan. A 2m podium setback to Streich Avenue is proposed in the draft Precinct Structure Plan. The intent of the increased setback to Albany Highway is to promote landscaping within the street setback (private realm) for all street frontages along Albany Highway.

The City supports the proposed setbacks at street level where passive surveillance and street activity is enhanced. The reduced setback at the corner of Albany Highway/ Streich Avenue creates a sense of place and supports the development as a landmark building in this locality.

Upper Floors

The upper floors mostly align to the podium/ground floor street setbacks. To note the City's draft Precinct SP envisaged upper floor setbacks to the corner of Albany Highway and Streich Avenue to be determined by a Local Development Plan, however given development is progressing under the DWA Framework, this is not required. The remainder of Streich Avenue seeks a 5m setback.

It is considered that the development would have benefited from upper floors above podium having increased street setbacks, particularly, for the eastern elevation facing Albany Highway. In turn this would have improved mitigation against noise levels from Albany Highway and enhanced building articulation. However, it is acknowledged that this may mean that the creation of the POS area and retention of trees may not have been achieved if this occurred to maintain the dwelling yield for the project.

Aesthetics & Public Art

Eastern Elevation

The Acoustic Report submitted includes several recommendations to achieve internal noise levels of 40dBL (daytime) and 35dBL (nighttime). One recommendation requires significant reductions to the area of external glazing on the eastern elevation facing Albany Highway.

Should this specific recommendation be implemented, it would materially change the appearance of this external elevation facing Albany Highway. Such a significant design change would likely reduce the building aesthetics by increasing the ratio of solid wall to glazing, which the City would not support.

The potential noise impacts and proposed mitigation measures require specific consideration by DWA to ensure an appropriate design amenity is achieved.

South Elevation (Facing POS), West Elevation (Facing train line) & Public Art

The south elevation facing the future POS (pocket park) and west elevation facing the train line are considered to have flat and less articulated elevations, especially in comparison to other more detailed and dominant elevations to the corner of Albany Highway/ Steich Avenue.

DWA Development Policy 4 – Providing Public Art details the requirements for public art contributions as part of a development proposal and provides performance standards to guide the assessment of development applications that include public art.

The south and west elevations will be viewed by the community enjoying the pocket park and/ or traveling on the train past the property. It is suggested that public art, required under DWA's DP 4, should be focused on these two elevations with the aim of uplifting their appearance via adding contrast and visual interest. This focus could also be on the material and pattern of balcony and shade screens.

Functionality, Build Quality & Community

Car Parking

Car parking requirements for this development are outlined in ARS2. The minimum resident car parking ratio required is 0.75 bays per dwelling. The visitor bay rate is 0.25 of the number of permanent residential car bays required.

37 on-site car bays are proposed for permanent residents, in lieu of a minimum of 48 as required under DWA's ARS2. This represents a difference of 11 on-site car bays for permanent residents. Only two visitor car bays are proposed, in lieu of a minimum of 12 as required under the DWA's ARS2.

The applicant has advised that car parking rates for these type developments are different to that outlined in the ARS2 and based on car parking demand observed from similar type developments in the metro region. The development proposes a provision of approximately 0.6 bays per dwelling. The applicant expects, that a development containing a degree of social housing will typically generate lesser parking demand as compared to a private residential development.

Overall, the car parking shortfall is a City concern and particularly the lack of visitor bays for a mid-rise residential build. The applicant's transport consultant has mentioned on-street parking for visitors in its assessment report, however there are limited on-street bays and the bays on the western side of Streich Avenue are associated with the users of the train station. On-street public parking around the site is limited with time limits not exceeding 15 minutes to serve station users and will not compensate for the proposed shortfalls. Existing on-street bays support the function of the train station and their current purpose is not likely to be suitable for visitor parking for the development. Visitor parking remains unresolved.

Build Quality

The submitted Acoustic Report highlights the cost associated with including high performance double glazing on the eastern elevation to mitigate against noise levels from Albany Highway and assist with complying with noise regulations. Due to the cost associated with this mitigation measure, it is not clear from the application if this measure will be implemented.

Providing the high-performance double glazing on the eastern elevation is the City's preferred mitigation measure. Not only would it retain the building aesthetics, but it would also improve the amenity for future residents, assist with complying with noise regulations and improve the long-term robustness of the project.

Mixed Use

The Kelmscott Town Centre Precinct Design Guidelines promoted commercial active uses at street level for this subject site due to its strategic location, opposite Albany Highway and Kelmscott Train Station and within the Kelmscott District Centre. To note the City's draft Precinct SP also seeks a commercial/ retail frontage along Albany Highway and Streich Avenue. Small retail, food and beverages uses are envisaged facing the Plaza.

The proposal does not include active uses, such as retail and cafes. A commercial use was considered initially, but appears to have been removed in favour of a 'community space' and additional plant and fire equipment. It does include three well-sized ground-level rooms (CHP Office, community room and residents lounge), each with potential for independent and direct access to the street. These spaces could potentially be adapted for future active commercial uses if the demand arises. Increasing their ceiling height to 4m, in lieu of 3.2m-3.3m would assist with facilitating future restaurant/café uses at ground level. This would also improve the long-term robustness of the project.

Dwelling Mix

The building is seen as a landmark development that can be used to promote sustainable transit-orientated development (TOD). The decision not to provide a minimum of six or more 3-bedroom apartments in accordance with DWA's Policy DP 9 is considered a missed opportunity to encourage larger households to live in TOD accommodation. However, it is acknowledged that the dwelling yield would decease and there is a shortage of 1 and 2 bedroom dwelling's within the City, therefore the dwelling mix is supported.

Amenity
Natural Ventilation

35 of out 65 apartments are single aspect and do not benefit from natural cross-ventilation. The Design Review highlighted opportunities for some north-facing apartments to achieve cross ventilation through the open-air circulation zone, provided that privacy is maintained. The applicant's response was that the opportunity for additional openings to the corridor side of the dwellings is to be explored during the design development phase in conjunction with the construction methodology and fire protection strategies.

The City supports further investigating such options to improve the natural ventilation for single aspect dwellings.

Living Area (Widths)

Under the R-Codes (Volume 2), the acceptable outcome for the minimum width of Living Areas in a 2-bedroom apartment is identified as 4m. Type 2A, 2B and 2C Living Areas have a minimum width of 3.8m. The minimum 4m width is intended to enhance the practicality of these spaces. It is noted that the layout of these rooms is significantly longer than wider to create additional internal space. The variation in this instance is considered minimal and will still allow for functional furnishing without disrupting circulation paths.

Privacy

Further details are required regarding the dividing wall between the balconies of two apartments on the first floor (dwelling Type 2A) that face Albany Highway. Plans do not detail type and height of the separating wall between both balconies. The dividing wall must act as a privacy screen between both balconies and comply with Building Code of Australia. The applicant will review this at the detailed design stage.

Heritage

The former Kelmscott Library and Infant Health Clinic are not included in the Armadale Redevelopment Area Heritage Inventory (MRA, 2017). However, the City of Armadale Local Heritage Survey (LHS) contains, at Appendix No.1, a list of places in DWA's Redevelopment Area that the Council considers to have heritage significance. These places are not able to be formally included in the City's Local Heritage Survey but will be included once the normalisation process (return of planning control to the City from DWA) is completed in accordance with Council's Resolution D67/11/19 regarding the adoption of the LHS:

> *"5. Note that a further report to Council will be made seeking the inclusion of the places identified in Appendix No.1 of the LHS into Part 6 of the document and this will occur at the time the Metropolitan Redevelopment Authority (Development WA) normalises each of its planning areas to the City".*

Place 125 is the Infant Health Clinic (fmr) - Category 4. Under the LHS, Category 4 is described as having 'little significance', (noting Category 1 is places of 'exceptional significance'). The establishment of the clinic was driven by the local community and was constructed in the (then) railway reserve, opening 31 August 1940. It operated until the summer of 2005-2006 when it was demolished along with the adjacent Kelmscott Library as part of upgrades to Kelmscott station. The LHS Appendix entry is included in the Attachments for further information. The retention of the significant trees and the presence of the former Kelmscott Library site could be included with the Infant Health Clinic in a plaque as part of the site history.

Landscape and Public Realm Quality

Public Open Space (Pocket Park)

The proposed development will provide a landscaped public open space (pocket park) to the south of the on-site car park. The size of the POS is approximately 837sqms and is envisaged to include 90% (750sqms) deep soil areas with circulating pedestrian paths. All existing mature trees in this POS area, including those protected under existing Management Orders, will be retained and protected. In addition, the proponent's design intent is to plant within the park;-

- Three new large sized trees;
- 4 medium trees; and
- 7 small trees.

Some bushes and shrubs are proposed for removal on the southern boundary of the future pocket park. None of these plants are identified as high value in the submitted arborist report and replacement appropriate landscaping is proposed.

Details of boundary fencing proposed between the public park and car park of the development have not been provided. Such fencing should be solid, durable and open style. The root structure of existing trees within the park must not be damaged by the new boundary fence.

The applicant's Landscape Plan appears to include part of the landscape strip within the northern boundary of the adjoining KFC lot. The applicant will need the adjoining landowner's support for any works on their lot.

On-Site Landscaping & Public Realm (Not Including POS/ Pocket Park)

Conceptual plans for landscaping around the building and within the public realm include:

- 5% (110sqms) of the building site to include deep soil areas;
- A central landscape atrium within the building with opportunities for feature planting;
- Permeable pedestrian paving around the development site;
- Streetscape seating and paving at the corner of Albany Highway/ Streich Avenue;
- Retention of existing trees within the road reserve;
- A small landscaped public area to the west of the site with the retention of a significant dead tree, of local significance; and
- Only two existing trees are proposed for removal due to their location within the future on-site car park and due to their health.

The future public realm of Kelmscott will be strategically shaped by the draft Precinct SP and draft Kelmscott District Centre Public Realm Strategy when adopted. Both documents will align with each other to achieve improved streetscapes with additional landscaping and tree planting within the road reserves. It is noted that the City, as part of its draft Public Realm Strategy, is currently analysing tree planting and public furniture for Streich Avenue. The draft Public Realm Study will also consider tree planting along Albany Highway where it abuts the subject site.

As previously discussed in this report, the City's preference would be to have greater building setbacks to Albany Highway for different planning reasons, including landscaping between the building and road interface, noise mitigation measures and to improve building articulation if the City can obtain Main Roads WA approval. However, this is likely to affect the provision of the proposed POS and retention of significant trees. A recommended condition of approval requires tree planting within the Albany Highway Road Reserve, in consultation with Main Roads and City of Armadale.

Regarding the public interface between the proposed building and Streich Avenue facing the Station Master House, the City is supportive of the building design and passive surveillance to this street. The proposal includes the retention of all street trees along this section of road, retention of the large significant dead tree and a verandah for pedestrian weather protection with informal seating arrangements. The City is supportive of this public realm outcome.

Waste Management Plan

A Waste Management Plan (WMP) was submitted with the application. Waste generation rates are sourced from the WALGA guidelines. The bin compound will be located on the ground floor. Bin sizes are 660L. The applicant's report states that waste collection for the proposal will be undertaken by a private waste contractor using standard rear-lift collection vehicles. The frequency of collection is once per week for each of three waste streams. Collection will occur from the proposed 12.5m long waste, loading and service embayment

on Streich Avenue, at the western boundary of the site. Bins will be wheeled out to this collection point by the waste collector. After emptying, bins will be promptly returned to the bin storage compound.

The WMP is considered satisfactory provided bulk waste is also collected and is managed by the Complex Manager via a private contractor. This is recommended as a condition of approval.

OPTIONS

Council has the following options:

1. Advise DWA that Council supports the proposed development application, subject to conditions and advice notes.

2. Advise DWA that Council recommends refusal to the development application and provide reasons.

Note: The wording of conditions and advice notes has been based on recent DWA approvals.

CONCLUSION

The proposal is viewed as a landmark building that would promote sustainable transit-orientated development (TOD) in the City of Armadale. It would provide sustainable, affordable and social housing for the local community, all within proximity to public transport.

The six-storey building height is supported given the strategic site context and compliance with the current state planning framework. The future Public Open Space (Pocket Park) and retention of the significant trees will be a significant positive contribution to the Kelmscott public realm. It is recommended that Council adopts Option 1.

RECOMMENDATION

That Council:

A) SUPPORT the proposed development, subject to the following conditions and advice notes:

CONDITIONS

1. Prior to the submission of a Building Permit (or as part of the DWA working drawings process), additional information/ revised plans shall be submitted to and approved by DevelopmentWA that modifies the proposal as follows;-

a. Full details of solid, durable and open style fencing between the car park and future Public Open Space (fencing must not damage the root structure of existing trees) and on the western elevation abutting the car park; and

b. Amended Acoustic Report addressing the following discrepancies;

i. The scale/ number of floor levels associated with the proposal;

ii. The speed limit for this section of Albany Highway; and

iii. Modelling to consider noise from nearby KFC drive-through and pedestrian crossing.

2. The development is to be undertaken in accordance with the approved plans and documents attached to this approval, details of which are to be provided at planning condition clearance (working drawings) stage, to the satisfaction of the DevelopmentWA prior to the commencement of construction.

3. The development must not be occupied until a Certificate of Title has been created and the site has been amalgamated into a single lot, to the satisfaction of DevelopmentWA.

4. A Parking, Service and Delivery Management Plan demonstrating allocation of parking bays, safe vehicle access, circulation, and egress, is to be submitted at planning condition clearance (working drawings) stage and implemented thereafter to the satisfaction of DevelopmentWA in consultation with the City of Armadale. (Refer to Advice Note a).

5. A landscape plan detailing both soft and hard landscaping elements (including Public Open Space) and ongoing maintenance/ management requirements is to be provided at planning condition clearance (working drawings) stage and implemented thereafter, to the satisfaction of the City of Armadale. (Refer to Advice Note b).

6. All building and tenancy entrance levels are to be consistent with the constructed paving levels of the adjoining public realm, details of which are to be provided at planning conditions clearance (working drawings) stage to the satisfaction of DevelopmentWA.

7. Any damage caused to the landscaping (including existing trees), footpaths, kerbs, roads, drainage infrastructure and open space areas adjacent to the site is to be made good at the applicant's expense prior to occupation of the development, to the satisfaction of DevelopmentWA in consultation with the City of Armadale. (Refer to Advice Note c).

8. A Lighting Strategy for the development, including the future Public Open Space, is to be submitted at planning condition clearance (working drawings) stage and implemented thereafter to the satisfaction of DevelopmentWA in consultation with the City of Armadale. (Refer to Advice Note d).

9. A Crime Prevention Through Environmental Design (CPTED) Statement, prepared by a suitably qualified person, confirming the design of the development is in

accordance with CPTED principles, is to be submitted at planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA. (Refer Advice Note e).

10. **A final Acoustic Report and certification from a qualified acoustic consultant, confirming that the design, construction, and use of the development will achieve an appropriate level of sound and vibration attenuation in accordance with Development Policy 3 —Sound and Vibration Attenuation is to be submitted at planning condition clearance (working drawings) stage, to the satisfaction of DevelopmentWA, in consultation with the City of Armadale. (Refer Advice Note f).**

11. **Elevations and specification detailing high quality materials, finishes and colours for the development, including "colour swatches" or material samples, are to be provided prior to planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA, in consultation with its appointed Design Review Panel. (Refer to Advice Note g).**

12. **Public art is to be provided in accordance with Development Policy 4 – Providing Public Art, details of which are to be provided at planning condition clearance (working drawings) stage and installed prior to occupancy to the satisfaction of DevelopmentWA.**

13. **All service areas, service related hardware and piped or wired services (such as car park gates, plant areas, fire booster cabinets, service meters, exhaust systems and air-conditioning units) are to be designed as an integral component of the development or screened from public view, to minimise any detrimental impact on the architectural quality of the building and the public realm, details of which are to be provided at planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA. (Refer to Advice Note h).**

14. **Ground floor windows and glazed areas are not to be provided with dark or reflective tinting, obscured glazing, visually obtrusive signage or with roller shutters/security blinds or other such devices, details of which are to be submitted at planning condition clearance (working drawings) stage, to the satisfaction of DevelopmentWA. (Refer to Advice Note i).**

15. **Privacy screening is to be included between the balconies of the two apartments on the first floor (dwelling Type 2A) that face Albany Highway. All privacy screening devices as shown on the final working drawings are to be installed prior to the occupation or use of the development, to the satisfaction of DevelopmentWA (Refer to Advice Note j).**

16. **Bicycle Parking is to be provided in accordance with the approved plans, details of which are to be provided at planning conditions clearance (working drawings) stage, to the satisfaction of DevelopmentWA.**

17. A Wayfinding and Signage Strategy, detailing the proposed location and size of all external signage consistent with Development Policy 6 – Signage, is to be provided at planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA. (Refer to Advice Note k).

18. A detailed report from a suitably qualified professional is to be submitted to DevelopmentWA at practical completion stage and prior to occupation of the building, confirming that all initiatives identified in the design certification and integral to the achievement of the minimum 4 Star Green Start rating (or agreed alternative) have been implemented, to the satisfaction of DevelopmentWA.

19. Adaptable housing is to be provided in accordance with Development Policy 10 Adaptable Housing, details of which are to be submitted at planning condition clearance (working drawings) stage and delivered prior to occupancy to the satisfaction of DevelopmentWA. (Refer to Advice Note l).

20. A Universal Access Statement, prepared by a suitably qualified professional, is to be provided at planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA. (Refer Advice Note m)

21. A Stormwater Management Plan is to be submitted at planning conditions clearance (working drawings) stage to the satisfaction of DevelopmentWA in consultation with the City of Armadale.

22. Crossovers, driveways, car parking, vehicle manoeuvring spaces and circulation areas are to be constructed, sealed, kerbed, marked, drained, and maintained in accordance with the approved plans and Australian Standard AS2890.01 to the satisfaction of DevelopmentWA, in consultation with the City of Armadale. (Refer to Advice Note n).

23. Any existing crossovers not included as part of the proposed development on the approved plan are to be removed and the verge reinstated with new kerbing to the satisfaction of DevelopmentWA, in consultation with the City of Armadale.

24. A Construction Management Plan is to be submitted at planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA, in consultation with the City of Armadale and adhered to for the duration of construction. (Refer Advice Note p).

25. A final Waste Management Plan is to be submitted at planning condition clearance (working drawings) stage to the satisfaction of DevelopmentWA, in consultation with the City of Armadale. (Refer to Advice Note q).

ADVICE NOTES

a. **With regard to Condition 4, the Parking, Delivery and Servicing Management Plan is to outline the proposed management regime to facilitate controlled access and egress to the car park and loading areas and is to include the following:**

   i. **the identification, signposting, and management of CHP employee, residential and visitor on-site parking bays;**

   ii. **the identification, signposting, and management of visitor parking bays;**

   iii. **the identification and management of ACROD bays in accordance with AS2890.6;**

   iv. **ensure all deliveries and collections occur in accordance with the Waste Management Plan;**

   v. **strategies to ameliorate amenity and noise impacts of deliveries/waste management on the surrounding area; and**

   vi. **management procedures, including scheduling of deliveries, to prevent multiple concurrent truck movements occurring, ensuring that truck movements do not unduly restrict access.**

b. **With regard to Condition 5, the final Landscaping Plan and associated Landscape Maintenance Strategy are to include the following:**

   i. **existing and proposed site levels, ensuring universal access across the site;**

   ii. **species (suitable to Perth's climate), sizes, and types of plantings;**

   iii. **the applicant is encouraged to utilise Indigenous species throughout the development's landscaping;**

   iv. **avoid selection of species which are susceptible to the Polyphagous Shot Hole Borer;**

   v. **tree planting within the Albany Highway Road Reserve (in consultation with Main Roads and City of Armadale);**

   vi. **uncovered at-grade parking is planted with trees at a minimum rate of one tree per four bays;**

   vii. **Where practical and feasible, the two existing trees identified for removal should be replanted into the POS;**

   viii. **details of seating, paving, kerbs, surface treatments, shade structures, street furniture and other infrastructure;**

   ix. **reticulation to plantings including rain/grey water capture and re-use;**

   x. **details of all proposed planting on structure, demonstrating that these landscaped areas are viable, will survive in the incumbent environmental conditions and are capable of being maintained in perpetuity;**

xi. details of the ongoing maintenance requirements for the landscaped spaces including responsibilities, reticulation, access, and safety systems;

xii. Maintenance of landscaping within planter boxes on the residential terraces; and

xiii. Management strategies in a strata titled development.

The applicant/landowner is advised to liaise with the City of Armadale regarding the integration of paving materials and landscaping between the public and private realm, including street tree requirements.

c. With regard to Condition 7, all street trees are to be protected during construction through measures consistent with AS 4970-2009 and retained:

i. a minimum 2.0m radius tree protection zone (TPZ) is to be provided through 1.8m high fencing around the verge trees and POS trees abutting the future car park (chain mesh panels or other suitable material) during construction of the subject development.

ii. the above fencing is not to be moved or removed at any period during construction, and this zone is not to be entered for any reason;

iii. the trees are to be provided with supplemental water during any construction period falling over summer, with a minimum of 150 litres being provided per week: and

iv. Any new crossover is to maintain a minimum clearance from the base of a street tree(s) as recommended in the Arborist Report dated 10 December 2025, unless otherwise supported by the City of Armadale.

d. With regard to Condition 8, the Lighting Strategy should demonstrate the following:

i. illumination of the building and Public Open Space to highlight architectural features and prominent trees;

ii. highlight and enhance entry points to the building and entry points/ pedestrian paths within the Public Open Space, to assist with wayfinding;

iii. assist safe access between the building, Public Open Space, car park, and within the car park and pathways;

iv. meet the Australian Standard 1158 (Public Lighting Code) and Australian Standard 4282: 2019 (Control of the Obtrusive Effects of Outdoor Lighting) in order to ensure that any nuisance light to adjoining properties and passing vehicular traffic is at an acceptable level;

v. incorporate Crime Prevention Through Environmental Design (CPTED) principles; and

vi. lighting fixtures and fittings are to be vandalism resistant.

e. With regard to Condition 9, the CPTED Statement should address the safety of external and internal areas of the development, including confirmation that the main lobby entry design is safe for all users and avoids spaces for concealment or entrapment, as well as CCTV locations and management. The CPTED Statement should inform the final Landscape Plan and Lighting Strategy.

f. With regard to Condition 10, the Acoustic Report should identify the location and extent of impact of all noise sources, inclusive of mechanical and plant equipment, and confirm that the design of the building will achieve an appropriate level of attenuation in accordance with Development Policy 3 Sound and Vibration Attenuation. The report should address potential noise emissions from mechanical service systems (such as exhaust systems and air conditioning) selection and plant equipment, design, and location to prevent emitted noise levels from exceeding the relevant decibel levels as provided by the *Environmental Protection (Noise) Regulations 1997*.

City of Armadale recommends that high performance double glazing be used to meet acoustic requirements and also retain the proposed glazing to solid wall ratio on the eastern elevation. Any significant changes required to the glazing to wall ratio of the eastern elevation should involve further input from the Design Review Panel (DRP) and the City.

g. With regard to Condition 11, further details, and information, including final specifications and samples, should be provided demonstrating high quality and durable external materials and design treatments across the development, and include:

- **i. High-quality and robust colour and material selections, ensuring that the standard established through the Design Review Panel review is delivered in the as-built product;**
- **ii. A materiality which clearly articulates the lower and upper floor levels of the development;**
- **iii. The City supports public art being focused on the south and west elevations with the aim of uplifting their appearance via adding contrast and visual interest. This focus could also be on the material and pattern of balcony and shade screens.**
- **iv. Colour scheme on eastern elevation must ensure the morning sun is not reflected back towards residential areas on the lower Darling Scarp;**
- **v. The final design details should be informed by the matters noted in the Design Review Panel Advice Note dated 10 November 2025.**

h. With regard to Condition 13, all mechanical service systems (such as air conditioners) should be designed, located, and maintained such that they are not visible from the street and to prevent emitted noise levels from exceeding the

relevant decibel levels as set out in the *Environmental Protection (Noise) Regulations 1997*.

Services and service-related infrastructure includes but is not limited to all piped and wired services, car parking areas and associated ventilation, roof plant / plant areas, bin storage areas, service meters and related infrastructure, fire booster cabinets, exhaust systems, air-conditioning units, antennae, and satellite dishes. Fire booster hydrants and service meter boxes should be designed, located, oriented, and finished to minimise any visual impact on the adjacent streetscape and maximise visual interaction between the development and the street. The balconies should not be used for drying or airing of clothes and/or manchester.

The applicant is advised to liaise with service authorities to rationalise and consolidate service infrastructure, where possible. Where service infrastructure adjacent to the street cannot be avoided due to service authority requirements, landscaping should be designed and implemented to reduce the visibility of the infrastructure from the public realm.

i. With regard to Condition 14, Development Policy 5 – Additional Structures require the protection of street level windows from the sun or for privacy and security to be achieved through passive solar design and architectural devices, rather than through the use of reflective coatings or roller shutters/security blinds to enable visible indoor activity and facilitate passive surveillance of the public realm.

The selected colour scheme on eastern elevation must ensure the morning sun is not reflected back towards residential areas on the lower Darling Scarp.

j. With regard to Condition 15, screening devices are to be at least 1.6 metres in height, and at least 75 percent visually obscure, permanently fixed, made of durable material, and restrict view in the direction of the overlooking into any adjoining dwelling.

k. With regard to Condition 17, the elevations should provide an indicative plan of all proposed signage, including location and dimensions, demonstrating that such signage will be complementary to the design of the building and not obscure architectural detail and materiality.

Development Policy 6 – Signage requires signage to demonstrate restraint in scale, size and collective amount of signage installed, in order to minimise visual clutter, protect amenity, and support a safe, attractive, and legible public realm.

l. With regard to Condition 19, an Accessibility Report should be provided demonstrating that a minimum 20% of the total number of dwellings delivered as part of the development conform to the Core Liveable Housing Design Elements outlined in Development Policy 10 – Adaptable Housing.

Accessible parking spaces for these dwellings should be provided in accordance with the Adaptable Housing Policy. The applicant is advised that the development should comply with the requirements of Part D3 of the Building Code of Australia (Access for People with Disabilities) and Australian Standard 1428.1 and the *Disability Discrimination Act 1992*.

m. With regard to Condition 20, the development should comply with the requirements of Part D3 of the Building Code of Australia (Access for People with Disabilities), Australian Standard 1428.1, and the *Disability Discrimination Act 1992*.

n. With regard to Condition 22, all car bay dimensions, crossovers, driveways, and circulation aisles should be constructed in accordance with Australian Standard AS 2890.1. Disabled bays are to comply with Australian Standard AS2890.6.

o. Walls, fences, vegetation, and other structures are to be truncated or reduced to no higher than 0.75m within 1.5m of where the driveway meets the road reserve.

p. With regard to Condition 24, the Construction Management Plan should address the following matters, which are to address all phases of development, including demolition and construction, to demonstrate how the construction of the development will be managed to limit impacts on surrounding properties:

i. Public safety and site security;

ii. Hours of operation;

iii. Dust management; Noise management;

iv. Waste and material disposal;

v. Parking arrangements for contractors and sub-contractors;

vi. Delivery and access arrangements;

vii. The storage of materials and equipment on site (no storage of materials within the public realm or future Public Open Space will be permitted);

viii. Details regarding the protection of existing street trees;

ix. Bonding and remediation arrangements; and

x. Any other matters likely to impact upon the surrounding properties or public realm.

xi. All street trees are to be protected during construction in accordance with AS4970-2009.

q. With regard to Condition 25, the Waste Management Plan is to comply with the City of Armadale standards in regard to waste, and Local Government Waste Management Plan Guidelines

i. Location of wash down areas, including details of access to permanent water supply and drainage;

ii. The bin area accessible for allow heavy vehicle movement.

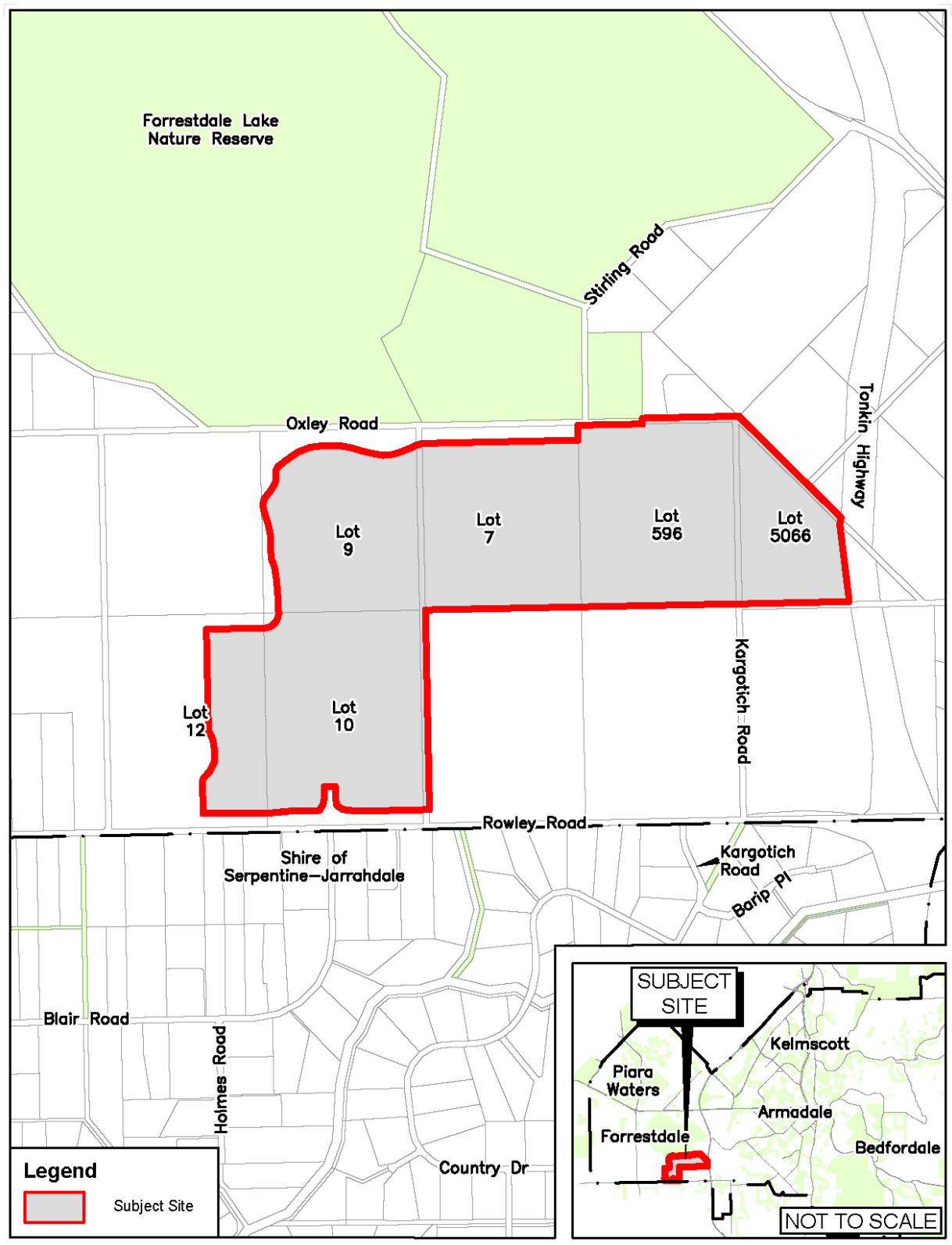
iii. Proposed waste collection times between 7:00am and 7:00pm;

iv. Contaminant checks within the FOGO bins; and

v. The disposal of bulk waste by Strata Management (private).

ATTACHMENTS

1. Development Plans
2. DWA Design Report
3. Tree Report
4. DevelopmentWA Public Comment Link
5. Design Review Panel (DRP) Advice Notes & DWA Comments
6. Local Heritage Survey Extract



LOCATION PLAN

Doobarda Industrial Business Park Stage 2

200 0 200 400m

SCALE 1 : 20000

DATE 14 November 2024 - REVISION 2401
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CITY OF Armadale

3.1 - STRUCTURE PLAN STAGE 2 DOOBARDA INDUSTRIAL BUSINESS PARK

WARD	:	LAKE
FILE No.	:	M/478/25
DATE	:	11 February 2026
REF	:	MK
RESPONSIBLE MANAGER	:	EDDS
APPLICANT	:	CLE Planning
LANDOWNER	:	Various
PROPERTY	:	Lots 10 & 12 (863) Rowley Rd, Lots 5 (596), 7 & 9 Oxley Rd & Lot 5066 Kargotich Rd, Forrestdale
ZONING: MRS	:	Industrial zone, Rural zone.
TPS No.4		Industrial Development zone, Rural Living zone

In Brief:

- A Structure Plan has been lodged with the City, by consultants for the developers, for Stage 2 of the Doobarda Business Park.
- The City is required to make a recommendation to the Western Australian Planning Commission with regards to the determination of the Structure Plan.
- Recommend that Council resolve to recommend to the WAPC that the Structure Plan be approved subject to the modifications outlined in this report and the attached Schedule of Modifications.

Tabled Items

Nil.

Decision Type

☐ **Legislative** The decision relates to general local government legislative functions such as adopting/changing local laws, town planning schemes, rates exemptions, City policies and delegations etc.

☐ **Executive** The decision relates to the direction setting and oversight role of Council.

☒ **Quasi-judicial** The decision directly affects a person's rights or interests and requires Councillors at the time of making the decision to adhere to the principles of natural justice.

Officer Interest Declaration

Nil.

Strategic Implications

Strategic Community Plan 2026-2035

2.1 Protection and restoration of the natural environment and the reduction of Environmental Impacts.
2.1.5 Biodiversity is managed to preserve and improve ecosystem health.
2.2.1 Focus on achieving high streetscape amenity in new developments.
2.5.1 Align the Land Use Planning framework with the City's strategic objectives, facilitating sustainable design and development.
2.5.2 Seek tree retention in new developments.

Legal Implications

Planning and Development Act 2005
Planning and Development (Local Planning Schemes) Regulations 2015
Metropolitan Region Town Planning Scheme Act 1959
Metropolitan Region Scheme
Town Planning Scheme (TPS) No.4

Council Policy/Local Law Implications

Local Planning Frameworks:
Local Planning Strategy 2016
Draft Local Planning Strategy 2024

Local Planning Policies:
- PLN 2.4 Landscape Feature and Tree Preservation
- PLN 2.6 Water Sensitive Design
- PLN 2.9 Landscaping
- PLN 4.1 Industrial Sites and Estates

State Planning Policies (WAPC):
- State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region
- State Planning Policy 2.9 Water
- State Planning Policy 3.7 Planning in Bushfire Prone Areas
- State Planning Policy 4.1 Industrial Interface

Development Control Policies (WAPC)
- DC 4.2 Industrial Subdivision

State Planning Frameworks:
- Perth and Peel@3.5 Million – South Metropolitan Peel Sub-regional Planning Framework

Budget/Financial Implications

Nil direct financial implications. Subsequent land development generates additional rate base, service demand, and capital and operational costs for new/upgraded infrastructure/local facilities.

Consultation

1. State Government Departments and service agencies.
2. Adjoining Local Government – Shire of Serpentine-Jarrahdale.
3. Nearby landowners within the City of Armadale and the Shire of Serpentine-Jarrahdale.
4. City of Armadale Development Consultation Unit.

BACKGROUND

In 2009, the State Government released an Industrial Lands Strategy for public comment to provide the essential strategic planning framework for industrial land use planning and development in the Perth and Peel regions over the next 20 years. In that initial 2009 Strategy, the South Forrestdale area was identified as one of six 'Priority industrial sites'.

The final report of the Strategy, produced by the WAPC, was retitled as the Economic and Employment Lands Strategy (EELS) and included the South Forrestdale site as a Priority site. In July 2015, Council considered a report on the WAPC's Perth and Peel @3.5million, which amongst other proposals, supported the designation of the South Forrestdale Precinct as an "Industrial Expansion Area", given it is consistent with the City's Local Planning Strategy, previous Council decisions and development of sites for employment and commerce are high priorities to assist with balancing the anticipated residential growth with the availability of jobs and employment. Subsequently, the WAPC's Perth and Peel @3.5 million South Metropolitan Peel Sub-regional Planning Framework released in March 2018 included the South Forrestdale site as an "Industrial Expansion Area".

Stage 1 Doobarda Business Park (DBP)

Stage 1 of the Business Park (comprised of Lots 6, 8 and 200 Rowley Road) was rezoned "Industrial" under the MRS and "Industrial Development" under the City's Town Planning Scheme No.4 in 2016. The development of additional potential employment centres within the City is a key objective of the City's Strategic Plan, Local Planning Strategy and Economic Development Strategy.

All of the strategic planning processes (MRS and TPS amendments, Structure Plan) for Stage 1 of the DIBP have already been completed and subdivision applications for Stage 1 were approved by the Western Australian Planning Commission. The subdivision for Stage 1 is under construction and earthworks, services and road construction is at an advanced stage as at November 2025. There are already two (2) businesses constructed and operating within Stage 1 and Development Applications have been lodged for other businesses.

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Stage 2 Doobarda Business Park (DBP)

An Amendment to the Metropolitan Region Scheme (MRS) rezoning the land within Stage 2 of the DIBP from the "Rural" zone to the "Industrial" zone was approved in October 2019. Amendment 116 to the City's Town Planning Scheme (TPS No. 4) was gazetted on 8 August 2023 and brought TPS No.4 into consistency with the MRS. Amendment 116 also introduced provisions into TPS No.4 outlining the matters to be addressed in a Structure Plan for Stage 2.

DETAILS OF PROPOSAL

The area for Stage 2 of the DBP is approximately 170 hectares and comprises Lots 5 (596), 7 & 9 Oxley Road, Lot 5066 Kargotich Road and portions of Lot 10 and Lot 12 Rowley Road, Forrestdale. Proposed land use land areas are detailed in the table below:

Item	Data	Section Number
Total area covered by the structure plan	166.46ha	Plan A
Area of each land use proposed: Zones · Industrial Business · General Industry Reserves · Parks and Recreation	 9.09ha 102.07ha 32.55ha	Section 4.1
Estimated lot yield*	140	Section 4.1
Amount of Public Open Space · CCW / REW / Bush Forever Buffers · Drainage · Unconstructed road reserve	 14.39ha 17.10ha 1.06ha	Section 4.1.3

**The lot yield is based on the anticipated mix of industrial land uses and associated lot sizes and is expected to change based on market demand.*

A Structure Plan for Stage 2 has been lodged with the City for assessment and provision of a recommendation to the Western Australia Planning Commission as to whether the Structure Plan should be approved. The following documents were lodged in support of the proposed Structure Plan:

- Structure Plan Report Part 1 Implementation and Part 2 Explanatory Report
- Local Water Management Strategy
- Bushfire Management Plan
- Environmental Assessment Report
- Transport Impact Assessment
- Engineering Servicing Report
- Buffer Management Plan

The Draft Structure Plan proposes the following:

- General Industry zone
- Industrial Business zone;
- Parks and Recreation reservations; and
- Public Purposes (Sewerage Pump Station).

A strip of land along the Rowley Road frontage of the Structure Plan area will be left in the Rural Living zone as part of the Scheme Amendment as the land is in the Rural zone under the Metropolitan Region Scheme (MRS) and the WAPC required the land to be identified for future widening of Rowley Road including construction of a roundabout at the intersection of Rowley Road, the new main entrance to Stage 2 of the industrial area and Blair Road. This is consistent with the WAPC's decisions for the road widening that has occurred at the frontage of Stage 1, which the WAPC required the landowners to cede free of cost at the subdivision stage.

Land identified for buffers to adjacent the Bush Forever site on the western side of the Structure Plan area and other conservation reserves associated with Forrestdale Lake to the north of the Structure Plan area were also left within the Rural Living zone under TPS No.4. The Structure Plan proposes this land be identified for Parks and Recreation – Local. The buffers will be ceded free of cost at the subdivision stage as per Clause 46.3(c) of Development Area 46 of TPS No.4.

The Draft Structure Plan for Stage 2 includes future road connections to roads currently under construction in Stage 1. The Structure Plan Report Part 1 states as follows with regard to Rowley Road:

Intersection treatments to Rowley Road should be generally in accordance with the Structure Plan, with final intersection treatments and interim construction opportunities to be determined at subdivision stage. 30m of widening is required to the Rowley Road reserve to facilitate road and intersection upgrades.

The report does not identify that the road widening will be ceded free of cost and it is unclear how the applicant/landowner thinks the land can be subdivided without the intersections constructed and dedicated. The City will be recommending a similar approach to Stage 1 apply.

COMMENT

Consultation methods included letters to State Government agencies, the Shire of Serpentine-Jarrahdale and landowners of properties adjacent to the Structure Plan area, the erection of signs on road frontages within the Structure Plan area, placement of relevant information on the City's website and a newspaper advertisement.

Total No. of submissions received :	56
No. of submissions of Support :	6
No of submissions comment only :	1
No. of submissions of objection :	49

Refer to the Confidential Attachments for location plan of submitters and Confidential List of Submitters.

The issues raised by the submissions have been summarised and recommendations made on each submission in the Key Issues section to this report, the "Schedule of Landowner Submissions" and "Schedule of State Government Submissions" attached to this report.

Submissions on the proposed Structure Plan were also received from several State Government agencies/departments including:

- Department of Health;
- Telstra;
- Department of Planning, Lands and Heritage – Aboriginal Cultural Heritage Office;
- Department of Planning, Lands and Heritage – Bush Forever Office;
- Main Roads Western Australia;
- Department of Biodiversity, Conservation and Attractions;
- Department of Fire and Emergency Services;
- Department of Water and Environment Regulation; and

- Water Corporation.

Key Issues Raised in Submissions

Blair Rd/Rowley Rd/New Rd roundabout and intersection

Issue 1 – Blair Rd/Rowley Rd/New Rd roundabout and intersection:

- *The siting of a principal entry point with a roundabout into the industrial estate directly opposite Blair Road is likely to have significant implications upon Blair Road in terms of increasing vehicle volumes on the local road. It is not clear what the rationale is for locating the primary entry road into stage 2 opposite Blair Road.*
- *The roundabout at Blair Road will encourage traffic from the industrial area to use Blair Road as a shortcut to and from Nicholson Road including large trucks.*
- *Any proposed measures to be put in place to restrict vehicle access of vehicles to Blair Road should be implemented prior to the commencement of site works and are to be at the cost of the Stage 2 landowners.*

Comment

The location of the principal entry point with a roundabout opposite Blair Road was determined during previous planning processes by the WAPC and Main Roads WA including the MRS and TPS Amendments. This was identified by the traffic consultants and Main Roads WA as the most appropriate location factoring in the spread and offset of intersections along Rowley Road. The applicant's revised Traffic Impact Assessment lodged with the City identifies that there is currently a relatively low level of traffic using Blair Road on a daily basis, and existing use of this road is well within the capacity of a local road as per the traffic figures below identified in the applicant's revised TIA:

- Current peak hour volumes on Blair Road are in the order of 52 vehicles per hour during the morning peak and 83 vehicles per hour during the afternoon peak.
- Daily mid-block traffic indicate a weekday average of 494 vehicles per day which is well below the target threshold of 3,000 vehicles per day for a typical access road.

The applicant's revised TIA does not include any proposals for modifications to the Blair Road intersection to discourage large vehicles (in particular) from using that road as a shortcut from Rowley Road to Nicholson Road. Regardless of the low volume of traffic occurring in Blair Road currently, it is considered appropriate for a provision/s to be included in the Structure Plan requiring the developer to modify the road pavement threshold to Blair Road such that the movement of large vehicles into Blair Road is discouraged. This could include threshold treatments that modify the alignment of Blair Road at the intersection (chicanes), raised platform just past entrance to Blair Road and the installation of "Local Traffic Only" signs. Any proposed modification within the Blair Road reserve would have to be approved by the Shire of Serpentine Jarrahdale as they manage this local road.

It is noted that the Shire of Serpentine-Jarrahdale have recently constructed both right turn and left turn pockets on Nicholson Road at the intersection with Blair Road and that these facilities may encourage more vehicles to use Blair Road as a shortcut from Nicholson Road to Rowley Road. This is more likely whilst the existing staggered intersection of Rowley Road and Nicholson Road exists as currently there are delays during peak periods for vehicles trying to turn into and out of Rowley Road from Nicholson Road.

It is expected that Blair Road will no longer be viewed as a shortcut route upon upgrade of the Rowley Road and the Nicholson Road intersection with a roundabout in future. The revised TIA concludes the following in this regard:

"As the industrial area is developed, there is no indication that industrial traffic would use Blair Road rather than Nicholson Road and Rowley Road. Further, as noted above, the Rowley Road / Nicholson Road intersection is likely to be upgraded in the near future which will improve accessibility. In the event that the Rowley Road / Nicholson Road is not upgraded and if rat-running becomes an issue in the future, potential measures could include traffic calming (e.g. speed humps and single lane treatments) along Blair Road to discourage non-local traffic."

Recommendation
That the issue is supported in part.

Issue 2 - The main intersection for Stage 2 should be relocated to the west and possibly align with the Western Power easement.

Comment
The location of the principal entry point with a roundabout opposite Blair Road was determined by the WAPC during the previous planning processes including the MRS and TPS Amendments. This was identified by the Traffic consultants and Main Roads WA as the most appropriate location factoring in the spread and offset of intersections along the Stage 1 and Stage 2 frontage. It is also not possible to move the intersection further west or in alignment with the Western Power Easement as the easement is within an area identified as public open space/drainage and is located within the Stage 1 development area. Breslin Avenue, a road within Stage 1 that intersects with Rowley Road and has WAPC subdivision approval, is located directly to the east of the Western Power easement and has recently opened to traffic.

Recommendation
That the issue is not supported.

Issue 3 - The main intersections from existing Forrestdale Business Park to Armadale Road do not have roundabouts despite Armadale Rd being a four (4) lane highway so why are they required on Rowley Road.

Comment
Main Roads WA determined the type of intersection treatments required for intersections from the Doobarda Business Park to Rowley Road and the developer is required to comply with this decision. Main Roads WA generally prefer roundabouts to traffic lights.

Recommendation
That the issue is not supported.

Issue 4 - The Nicholson/Rowley Road intersection upgrade must be completed prior to this development commencing.

Comment
The City of Armadale is currently carrying out detailed investigation/design for the upgrade of the intersection of Nicholson and Rowley Roads. Originally, the proposed upgrade was to

be funded partially through the State Government's Black Spot funding program. However, the estimated cost of the upgrade was determined to exceed the amount that could be funded through this program. The City is currently seeking alternative funding sources in liaison with Main Roads WA and the Shire of Serpentine-Jarrahdale. The City's Technical Services have estimated that it will be at least four (4) years before the upgrade will occur at this intersection.

Recommendation
That the issue is not supported.

Amenity Impacts
Issue 5 - Development of Stage 1 of the industrial area has a large number of trucks bringing in fill and this has resulted in wildlife injury and death and dust problems.

Comment
Construction management measures will be addressed as needed through future stages of planning (i.e. Subdivision Applications and Development Applications). A Fauna Relocation Plan could be required as a condition of future subdivision approvals.

Recommendation
That the issue is supported in part.

Issue 6 - Industrial Business zone and the future land uses could bring about increased vehicle movement at all hours, depending on the businesses that operated there (e.g. Petrol Stations, Fast Food outlets etc), making a significant and negative impact on rural residential lifestyle south of Rowley Rd.

Comment
The Industrial Business zone will act as a less intensive transition zone between the General Industry zone and rural residential uses south of Rowley Road. This is consistent with the requirements of SPP 4.1 Industrial Interface. Traffic volumes generated by Stage 2 are consistent with the zoning and planned intent for Rowley Road. Ultimately, Main Roads WA intend to reclassify Rowley Road as a Primary Regional Road under the Metropolitan Region Scheme (MRS) and the road will be upgraded to 4 lanes, which has been known for many years.

Recommendation
That the issue is not supported.

Issue 7 - Operating business in stage 1 has been impacting surrounding areas (bush areas/conservation areas and nearby residences) with light spill from floodlighting of outdoor areas.

Comment
Conditions relating to matters such as this are included in Development Approvals. The City has liaised with owners/operators of the existing businesses in Stage 1 to address the light spill issues that were occurring. It is intended to require the addition of provision/s related to the control of lighting direction, spill and maximum illumination with the requirements of the Structure Plan to be assessed when development applications are received.

Recommendation
That the issue is supported in part.

Issue 8 - The proponent should be required to prepare a noise map for the entire development site.

Comment
An acoustic assessment is not required at the Structure Planning stage when the specific future land uses that will be developed in the future are unknown. This will be addressed at subsequent stages of development (development application stage) in accordance with the EPA's *Guidance for the Assessment of Environmental Factors - Separation Distances between Industrial and Sensitive land Uses* when it is known what specific land uses are proposed.

Recommendation
That the issue is not supported.

Environmental Impacts/Impact on Forrestdale Lake
Issue 9 - Proximity of industrial area to Forrestdale Lake, a highly biodiverse area of immense ecological significance, is of concern. Forrestdale is home to a unique species of bee that has not been found anywhere else, making it an irreplaceable natural habitat. Bees which are essential for agriculture. It is also habitat breeding grounds for Black Swans and habitat for endangered Black cockatoos. The development threatens to disrupt this fragile ecosystem through increased pollution air, light and water) habitat destruction, and encroachment on vital green corridors. The plan's focus on industrial expansion, with insufficient attention to environmental preservation, risks irreversible damage to this unique biodiversity hotspot. Trees can also not be replanted as cockatoos require mature trees.

Comment
The land is identified for industrial development under the State Government's Perth and Peel @3.5 million frameworks and the Metropolitan Region Scheme. Protection of environmental features external to the site are facilitated through the provision of buffers and revegetation of buffers to improve existing environmental qualities and provide separation of the industrial land to environmental features.

An Environmental Impact Assessment (EIA) was completed by the applicant to inform the Structure Plan as well as other technical documents such as a Buffer Management Plan. The EIA resulted in the following conclusions:

- Development of the site is not constrained by any environmental factor.
- Additional management of the following factors will be required in future stages:
  - Urban Water Management Plans in accordance with Better Urban Water Management;
  - If required further investigation and possibly management for Acid Sulphate Soils;
  - Dust Management Plans; and
  - Fauna trapping and relocation plans prior to subdivision works.
- There are no Threatened or Priority flora species on the site, therefore flora is not a constraint to the proposed development of the site;
- The vegetation on the site is Completely Degraded and is not representative of a Threatened or Priority Ecological Community, therefore the vegetation is not an impediment to the proposed development; and

- The site contains a small number of Marri trees which provide foraging habitat (less than 0.04 ha.) and one potential breeding habitat tree for Carnaby's and Forest Red-tailed Black Cockatoos. It is recommended in the Schedule of Modifications that this group of Marri trees be required to be retained.

Recommendation
That the issue is supported in part.

Issue 10 - There will be large stormwater holding basins in the new industrial area and this will provide breeding areas for mosquitos.

Comment
The design of basins will be considered in accordance with acceptable standards and managed by the City of Armadale. A Mosquito Management Plan and/or drainage design approvals could be required to be prepared as a condition of subdivision approval.

Recommendation
That the issue is not supported.

Issue 11 - Further investigation should be undertaken on:
- *Forrestdale Lake - Impact on Forrestdale Lake water level.*
- *The cumulative effect of this development and others on the Swan Coastal Plain on properties downstream towards the Peel estuary.*
- *There is little information on the possible impact on the hydrology of Forrestdale Lake.*

Comment
About 50 groundwater monitoring bores have been installed across Stages 1 and 2 to assess groundwater variations within the area. Groundwater levels and contours from monitoring since 2012 indicate groundwater flow direction is generally away from the Lake, except for the north-west corner. The development is also at the northern end of the Serpentine Catchment and topography indicates surface flow is away from Forrestdale Lake. Post development stormwater strategy is consistent with pre-development which conveys water south to Rowley Rd, away from Forrestdale Lake. With regard to any potential for wastewater/stormwater from the industrial area potentially impacting Forrestdale Lake the applicant's EIA concludes the following:

- The site is located approximately 200m south of the RAMSAR listed wetland Forrestdale Lake.
- Forrestdale Lake is not downstream from the proposed development area as the groundwater flows to the south-west.
- Forrestdale Lake is also not linked to the proposed development area by surface water flows.

Recommendation
That the issue is not supported.

Issue 12 - The Proponent should be required to contribute funds into a fund for the ongoing management and restoration of Forrestdale Lake.

Comment
This is not a requirement of the WAPC's planning framework and Forrestdale Lake is under the control and management of the Department of Biodiversity, Conservation and Attractions (DBCA).

Recommendation
That the issue is not supported however, the City supports DBCA making improvements to the management of Forrestdale Lake.

Issue 13 - There should be an impetus on maintaining connecting corridors between conservation, recreation and other reserves, uninterrupted by roads.

Comment
The structure plan proposes the reservation of an existing road reserve between Oxley Road and the multiple use wetland located within Stage 1 Lot 8 to provide a corridor between Forrestdale Lake and ecological corridors to the south.

Recommendation
That the issue is supported in part.

Issue 14 - The proponent should be required to collect seeds of provenance flora species for revegetation.

Comment
There is very little native vegetation on the site and seed collection from such sparse vegetation is not viable. The Buffer Management Plan specifies that tubestock will be sourced from specialist nurseries that collect local provenance seed and raise tubestock. The nursery used will be a Nursery Industry Accreditation Scheme Australia (NIASA) accredited nursery.

Recommendation
That the issue is not supported.

Issue 15 - The Doobarda development is at the northern end of the Serpentine catchment drainage system. Studies by DWER indicate that the drainage system in the catchment will not be able to cope with extra water being discharged into the drains as a result of new developments in the catchment area. The result will be flooding of properties further downstream from the development.

Comment
The development area is part of the Water Corporation's Birrega Main Drain catchment. Pre-development flows and capacity of the drain are outlined in the *Birrega and Oaklands Flood Modelling and Drainage Study* (DoW, 2015). The applicant advises that peak post-development outflows from Stages 1 & 2 are consistent with pre-development outflows. The flows will require Water Corporation approval.

Recommendation
That the issue is not supported.

Issue 16 - There is already a Business Park in Forrestdale and a new one is not required.

Comment
The land is identified for industrial development under the State Government's Perth and Peel @3.5 million frameworks and the Metropolitan Region Scheme, which identified the need for additional land for commercial and employment purposes.

Recommendation
That the issue is not supported.

Issue 17 - There was no consultation with Shire of Serpentine Jarrahdale residents and the City of Armadale should seek feedback from all Shire residents located between Rowley Road and Thomas Road.

Comment
The City referred the Draft Structure Plan to the Shire of Serpentine-Jarrahdale for comment and received a submission back from the Shire. Letters inviting comment on the proposed structure plan were sent to landowners on the south side of Rowley Rd opposite Stage 2, Blair Road, Country Drive, Barip Place, portion of Kargotich Road from Rowley Road to Country Drive. This is considered to be an appropriate direct referral area. Signs were placed on Rowley Road and an advertisement was placed in the newspaper. An invitation to comment on the proposal was also extended to nearby residents within the Shire when the land was rezoned to Industrial Development under Town Planning Scheme No.4.

Recommendation
That the issue is not supported, as appropriate consultation has occurred and more than required by the *Planning and Development (Local Planning Schemes) Regulations 2015*.

Issue 18 - As the area is classified as bushfire-prone, greater emphasis on fire-resistant landscaping and comprehensive fire management strategies is required.

Comment
Landscape species will be a consideration at detailed subdivision design / development application stages in accordance with the bushfire management plan as applicable.

Recommendation
That the issue is supported.

Comments Received from Government Agencies and Utility Providers

Shire of Serpentine-Jarrahdale
The Shire lodged two submissions with the City in response to the Structure Plan. The first was quite brief and raised no significant issues. The second submission was lodged after the close of the advertising period and was more detailed raising the following matters:

Land Use Compatibility - The Shire queried whether the proposed Industrial Business zone was an appropriate transition zone between the two diverse areas.

The Industrial Business zone is a zone that is usually placed at the front of industrial areas as the types of uses allowed in that zone are less likely to have an impact on adjacent residential areas than General Industrial uses. In addition, the 50 metre road reserve for Rowley Road provides a significant separation between the industrial area and the Oakford rural-residential area.

Separation distances between industrial landuses and nearby rural residential area – The Shire queried whether the EPA's guidance with regard to this matter could be complied with.

Separation distances as per the EPA's guidance statement is addressed at the Development Application stage as it is not possible to know what the exact nature of businesses to be established in the area will be until that stage.

Visual Amenity Impacts – The Shire requested a 50m deep vegetation buffer between the industrial area and Rowley Road.

A 50m deep vegetation buffer between the industrial area and Rowley Road is not a reasonable requirement or supported by the applicants. There will be some landscaping and tree planting between the lots in the industrial area and Rowley Road but it is also necessary for the industrial area (and especially the more customer oriented types of businesses that will occur in the Industrial Business zone) to have exposure to the primary road being Rowley Road.

Rowley Road and other road upgrades – The Shire has highlighted that upgrades are needed to Rowley Road to accommodate the additional traffic that will be generated by the industrial area. They have also requested that the proposed upgrades to the Rowley Road/Nicholson Road intersection be the responsibility of the developers of the industrial area.

Rowley Road (portion abutting the industrial area) will be upgraded by the developer to Main Roads WA requirements. This will be an interim upgrade until Main Roads WA's planned widening of Rowley Road to a four-lane road occurs in the future. This is consistent with the requirements imposed on the Stage 1 developer by the WAPC and Main Roads WA. Traffic volumes on Rowley Road will continue to increase in the future as a result of not only the industrial area, but also the Westport development on the coast, the Wungong urban area (which will have an ultimate population of approximately 40,000 people) and surrounding development, including in the Shire of Serpentine-Jarrahdale.

Upgrade of the Rowley Road/Nicholson Road intersection is remote from the industrial area and funding for the upgrade is being sought by the City of Armadale in liaison with Main Roads WA and the Shire of Serpentine-Jarrahdale. As stated above the industrial area is only one source of traffic volume increases on this road.

Blair Road/Rowley Road Intersection – The Shire requests that this proposed four-way intersection (with roundabout) be moved east to the existing Western Power easement.

The Western power easement is within Stage 1, a constructed road (Breslin Avenue) is already located next to the easement and the location of the new intersections along Rowley Road were determined by the WAPC/MRWA as per WAPC's subdivision approval for Stage 1 at the MRS amendment stage of planning for this industrial area. The land around the Western Power easement is identified as public open space and this location was determined

due to the substantial remnant vegetation on the site, the POS containing both Multiple Use and Resource Enhancement wetlands and the significant infrastructure within the Western Power easement, which includes high voltage powerlines and associated towers. The Structure Plan for Stage 1 was advertised for public comment and approved by the Western Australian Planning Commission (WAPC) on 14 May 2021.

The subdivision for Stage 1 of the Business Park was approved four (4) years ago and the roads and lots within Stage 1 have WAPC subdivision approval and are currently under construction or completed. This includes a road with an intersection on the eastern side of the Western Power easement located to meet Main Roads WA's requirements. The locations of the proposed intersections between the new Business Park and Rowley Road were determined by Main Roads Western Australia as part of the WAPC's two (2) Metropolitan Region Scheme (MRS) amendments for Stages 1 and 2 and included the land required for the intersections and widening of Rowley Road being left in the Rural zone under the MRS.

Accordingly, the subsequent Town Planning Scheme Amendments and the structure plans were required to incorporate the set intersection locations that had been determined through the preceding WAPC planning processes. The relevant Authorities (WAPC for the MRS amendments and the City of Armadale for the town planning scheme amendments and structure plans) carried out public advertising for both the MRS and TPS Amendment processes and consultation occurred with the Shire of Serpentine Jarrahdale before determination occurred at the State Government level. It is noted that the Shire of Serpentine-Jarrahdale submission to the WAPC with regard to MRS Amendment 1340/57 (Rowley Road Industrial Area Stage 2) indicated that the Shire supported the MRS Amendment and did not raise any objections to the proposed intersection locations identified in the MRS Amendment.

Transport and Industrial Noise Impacts – The Shire states that the industrial area should be assessed against State Planning Policy 5.4 Road and Rail Noise (SPP5.4).

SPP 5.4 is not applicable to the preparation of the Stage 2 Structure Plan as the Structure Plan does not propose any new major roads, Rowley Road is existing and Main Roads WA advise that they will be seeking the road's reclassification as a Primary Regional Road and upgrading the road to 4 lanes in the future.

Main Roads WA

The Structure Plan and Traffic Impact Assessment (TIA) were referred to Main Roads WA for comment twice. In response to the first referral, Main Roads WA advised the City that the applicant's TIA lodged had deficiencies with regard to information required and some inaccurate data and modelling had been used to inform the TIA. The applicant subsequently lodged a revised TIA with the City which was referred to Main Roads WA.

Main Roads WA advise that they still do not support the approval of the Structure Plan and require the following information to be provided to address unresolved matters:

1. The Structure Plan for Stage 2 to include a 70m wide road reserve for Rowley Road.
2. Revised Transport Impact Assessment addressing all items raised in Main Roads WA's previous advice.
3. A Staging Plan outlining the timing of interim and ultimate road upgrades. The plan should include how road upgrades and connections will be coordinated across each stage to ensure road upgrade requirements are identified.
4. 15% Concept Design for Rowley Road addressing the following:

- Mid-block and intersection treatments, including upgrades to the Tonkin Highway/Rowley Road intersection, to accommodate both interim and ultimate traffic volumes.
- Intersection designs must accommodate Restricted Access Vehicles (RAV) and be consistent with the approved Stage 1 Rowley Road/Kargotich Road roundabout layout.
- Land requirements for widening Rowley Road to a 70m reserve, including intersection widening to support appropriate vehicle movements.

Response to Main Roads WA requirements:

1. The extent of the road widening (30 metres) required for Rowley Road was determined at the Metropolitan Region Scheme (MRS) Amendment stage of planning and the WAPC left the land identified as being required for road widening in the Rural zone. The City was subsequently required to leave the road widening area within the Rural Living zone through the amendment to the City's Town Planning Scheme. This will enable a 50 metre wide road reserve for Rowley Road and is consistent with that required for Stage 1. Main Roads WA advised that they have not commenced a design process for the ultimate upgrade they intend to do in future for Rowley Road. Accordingly, this request for additional road widening is not supported. The applicant advises that they will not agree to the requested additional road widening so this and other outstanding Main Roads WA matters will be up to the WAPC to resolve when the Structure Plan is forwarded to them for approval.
2. The applicant advises that all of the additional information and revisions required to the TIA were completed and the data used in these revisions was obtained from Main Roads WA.
3. The applicant advises that a staging plan cannot be provided at this stage due to the many different landowners in Stage 2 (Stage 1 has a single landowner).
4. The Detailed design (15% concept) for Rowley Road and Tonkin Highway will not be undertaken at structure planning stage. The Subdivision process is adequate and an appropriate pathway to address detailed design considerations, particularly considering Stage 1 approvals.
5. The applicant does not agree with ceding the land required for road widening free of cost and note that there is currently no Primary Regional Road reservation over Rowley Road. However, it is noted that land required for widening of Rowley Road in Stage 1 was required by the WAPC to be ceded free of cost by a condition of the subdivision approval for Stage 1. The western portion of the Stage 2 land won't be able to be subdivided without the construction of the new access to Rowley Road and its dedication.

Department of Biodiversity Conservation and Attractions (DBCA)

DBCA advise the following issues need to be addressed:

1. There has been a lack of consultation regarding the preparation of the Structure Plan and supporting documents with the Structure Plan not accurately reflecting current wetland mapping in the Geomorphic wetlands of the Swan Coastal Plain (GWSCP) Dataset.
2. The Buffer Management Plan (BMP) states that a 50m buffer is only provided to vegetation in 'Good or better condition'. This is not supported by any policy framework or evidence that the wetland values can be maintained with a smaller buffer and is not satisfactory to DBCA.
3. DBCA report on the CCW located north of Oxley Road advises that the mapped area of the CCW has been extended and as such mapping must be amended in the Structure Plan to identify new boundary and associated extension to the width of the Buffer zone.

4. The proposed placement of retaining walls/batters and stormwater retention storage within the wetland buffer, as indicated in the Local Water Management Strategy, is not considered appropriate.
5. Why the unmade road reserve running north-south between Lots 9 and 7 Oxley Road has been excluded from the BMP (PGV 2024) when it has been identified as an important link between the REW to the south and Forrestdale Lake to the north.
6. The inclusion of firebreaks within the buffer area is not suitable.
7. The LWMS does not include the potential for supplementation to Forrestdale Lake. As discussed throughout the previous planning processes, DBCA is able to assist the applicant in further investigating the developments' potential for water supplementation as an opportunity to increase water levels at Forrestdale Lake.
8. DBCA do not agree that it is unlikely that *Jacksonia gracillima,* a priority 3 species, occurs in the Structure Plan Area as is stated in the Flora and Vegetation Survey lodged with the Structure Plan.
9. Does not agree with the assertion in the EIA that there are no Kangaroos foraging in the vegetation in the Structure Plan area, despite the vegetation areas being highly degraded, and recommends that a Fauna Management Plan be required prior to clearing.

Response to DBCA issues:

1. The proposed industrial area has been referred to DBCA at multiple stages of the development of the area including the Metropolitan Region Scheme (MRS) Amendment rezoning the land to Industrial under the MRS (1340/57 gazetted 2019) and the Town Planning Scheme Amendment rezoning the land in parts to Industrial Development zone (Amendment 116 gazetted 2023).

   An Environmental Impact Assessment (EIA) was prepared in 2017 to support the Metropolitan Region Scheme Amendment for Stage 2 of the Doobarda Business Park. The same document was lodged with Town Planning Scheme Amendment 116 for Stage 2. Amendment 116, including the EIA was referred to the Department of Biodiversity, Conservation and Attractions (DBCA). DBCA's submission on Amendment 116 stated that referral of the proposed scheme amendment had prompted DBCA to undertake a preliminary review of the wetlands in the area covered by Amendment 116 and that this review had revealed that there were wetland values outside of the current wetland boundaries. DBCA advised that consequently it was intended for a formal evaluation of the wetland management categories and values would be undertaken in the future and that this may result in changes to wetland mapping. In October 2023, DBCA forwarded a copy of the Wetland Evaluation to the City and to the owners of all the land examined in the evaluation. The Applicant's Environmental Assessment report lodged with the Structure Plan for Stage 2 was completed in June 2024. The June 2024 Environmental Assessment did not address the proposed expanded boundaries of the wetlands in Stage 2 recommended in DBCA's 2023 Wetland Evaluation. DBCA have advised that the expanded wetland boundaries will become official once they have been included in Geomorphic Wetlands Swan Coastal Plain dataset. In email correspondence to the City in February 2026, DBCA advised that this action has not been completed by DBCA yet but that it should be completed around March 2026.

2. The depth of buffer areas was determined at the MRS amendment stage and the WAPC left the buffers in the Rural zone in the MRS and the Rural Living zone in the TPS as a result. The extent of the buffer areas should be determined by the WAPC, in liaison with DBCA, when the Structure Plan is referred to them for finalisation. If the outcome is that

wider buffers to the wetland are required then the Buffer Management Plan will require revision.

3. The WAPC and DBCA will need to liaise to determine whether the CCW boundary should be extended in accordance with the report on the CCW located north of Oxley Road (attached to DBCA's submission and previously provided to the affected landowners by DBCA). Assessment of the appropriate Buffer width will also need to be determined, and the Structure Plan and Buffer Management Plan amended accordingly if required. Provision 46.3 (a) in Schedule 8 of the TPS states as follows: *"The buffer areas are to be detailed on the Structure Plan. The extent/width of the buffers is to be to the satisfaction of the EPA and DBCA."*
4. The City is in agreeance with DBCA that no drainage, infrastructure, roads or other development (such as batters or retaining walls) should be allowed within the buffer areas and has included this in the Schedule of Modifications.
5. Oxley Road is unconstructed west of the Stirling Road intersection and the Structure Plan needs to be corrected in this regard. This item has been included in the Schedule of Modifications and the potential for the unconstructed road reserve to be closed and amalgamated with adjoining conservation reserves has also been included.
6. The City does not support firebreaks within the buffers and has included this item in the Schedule of Modifications.
7. The developers' consultants investigated the possibility of providing supplementation to Forrestdale Lake with treated stormwater but determined that due to the topography between the industrial area and Forrestdale Lake it was not feasible, would require clearing of vegetation within Bush Forever Site 345 for the infrastructure required and would be financially prohibitive.
8. There is limited native vegetation, particularly understorey vegetation, on the portions of the subject land that will be developed for industrial lots in future. Existing vegetation in those areas consists mostly of trees. If there are any areas containing *Jacksonia gracillima* it will likely be within the Bush Forever area on and abutting Lot 12 and wetland areas which are protected from development.
9. A Fauna Relocation Plan will be required as a condition of any future subdivision approvals.

Water Corporation (WC)

The Water Corporation provided general advice about planning for and funding of water supply and wastewater infrastructure. It was pointed out that the wastewater information in the Engineering Servicing Report was not correct/current because the permanent Wastewater Pump Station (WWPS) that is planned to service the catchment has now been located to the north. The actual location of the permanent WWPS will need to be determined during the design stage. This has been included in the Schedule of Modifications.

Department of Water and Environment Regulation

DWER advised they will not provide support for the Structure Plan until the LWMS is approved. The LWMS has been lodged with DWER and the City but is still being assessed. The applicant has advised that they are continuing to liaise with DWER with regard to the LWMS at each stage of its review. DWER also required conclusion of the stormwater flow quantities for Stage 1 as this may impact drainage requirements in Stage 2. This data has now been finalised. The Stage 2 LWMS may require revision as a result.

Bush Forever Office – DPLH (BFO)

The BFO noted that the 50m buffer provided to the Conservation Category Wetland and the 30m buffers to the Resource Enhancement Wetland were acceptable.

The BFO raised the following queries in their submission:
1. Whether the buffer areas would be managed by the City in future.
2. Table 1 of the LWMS states that: There are no wetlands or associated buffers within the development area. However, it is noted that the buffer to REW (UFI 15796) does impact Lot 10 within Stage 2. The LWMS requires endorsement by DWER and as such, they should be consulted on the application.
3. Future planning stages will require the preparation of a Subdivision and Development Water Management Report and ancillary documents such as the development of a Wetland Management Plan.
4. The retention of native trees in line with SPP 2.8 and SPP 2 is recommended, which encourages the retention of existing vegetation and fauna habitat through the planning decision-making process.

The City's responses to the BFO's queries are as follows:
1. It is confirmed that any areas of POS identified on the Structure Plan will be ceded to the Crown and placed under the management of the City through the subdivision process.
2. A correction is required to Table 1 of the LWMS regarding wetlands in the development area. This is included in the Schedule of Modifications. The LWMS has been referred to DWER and is under review by them.
3. Both an Urban Water Management Plan and a Wetland Management Plan will be required through conditions of subdivision.
4. The site is mostly cleared having historically been used for rural purposes. Earthworks and fill will be required to provide separation to groundwater and for servicing. Where possible trees will be retained in drainage areas subject to earthworks, road reserves and buffer areas (which will become Public Open Space). The requirement to retain the stand of marri trees that provide cockatoo foraging habitat has been included in the Schedule of Modifications.

Aboriginal Heritage Office – DPLH (AHO)
The AHO advised that there are no known Aboriginal Heritage sites identified in the SP area. No approvals under the *Aboriginal Heritage Act 1972* (AHA) are required in this instance. Limited Aboriginal heritage surveys have been completed over the subject land, as such it is unknown if there is Aboriginal heritage present. This advice was forwarded to the applicant.

Department of Fire and Emergency Services (DFES)
DFES advised that the Bushfire Management Plan was assessed in accordance with the 2015 *State Planning Policy 3.7: Planning in Bushfire Prone Areas* (SPP 3.7) and 2021 *Guidelines for Planning in Bushfire Prone Areas* (version 1.4) (Guidelines). DFES have identified deficiencies in the data in the Bushfire Management Plan (BMP). Revision of BMP will be required in accordance with comments provided by DFES and this requirement is included the Schedule of Modifications prepared for DPLH.

Refer to the attachment Schedule of Submissions from Government Agencies for more detail on submissions received from the organisations and groups listed in the above table.

Traffic Impact Assessment
Most of the issues raised in submissions from nearby landowners and the Shire of Serpentine Jarrahdale were in regard to:

- the location of the new intersection from Rowley Road to Stage 2;

- its alignment with the existing intersection of Blair Road and Rowley Road; and
- the potential increase in traffic volumes on Blair Road as a result of the development.

Accordingly, the applicant was asked to address a number of matters including revising the TIA. The additional information requested from the applicant and the applicant's response to those matters is in the table below:

Additional Information Requested	**Applicant's Response**
Details of existing vehicle movements between Rowley Road and Nicholson Road via Blair Road.	Traffic counts for Blair Road have been undertaken demonstrating 52 and 84 vehicle movements in the AM and PM peak periods respectively for the approximate 53 properties with frontage to Blair Road. An average of 494 vehicles per day use the road which is well within the capacity of 3000 for access streets.
Modelling of expected traffic volumes from Rowley Road and Nicholson Road via Blair Road and vice versa based on the upgrades not being completed to the Rowley Road/Nicholson Road intersection	The preferred route taken by drivers depending on one intersection configuration vs another is not something that can be determined from traffic modelling with any meaningful results. The most realistic intervention would be to maximise the efficiency of the main route which is what is proposed (City proposed roundabout at Rowley / Nicholson and upgrades along Rowley Road to facilitate development). Traffic calming such as speed humps and slow points can be considered along Blair Road if non-local traffic increases significantly and becomes an issue. However as noted above, there does not appear to be a significant amount of non-local traffic along Blair Road under the current scenario without upgrades to the Rowley Road / Nicholson Road intersections. The quantity of traffic entering Blair Road from Rowley Road is currently minimal and is generally expected to be local traffic only. Each route has an equal distance of travel for movements to the southwest however Rowley Road and Nicholson Road will remain the desirable through route due to planned upgrades of Rowley Road and the Nicholson Road Roundabout and the speed of travel on this route. The movement of traffic not factoring in the Rowley / Nicholson Road upgrade would make no difference to path of least resistance and is not a realistic outcome given commitment for upgrade by Stage 1, Stage 2, MRWA and the City of Armadale. It is anticipated that the movements into Blair Road would remain relatively unchanged serving local traffic only.
Modelling of expected traffic volumes from Rowley Road and Nicholson Road via Blair Road and vice versa based on the upgrade having been completed to the Rowley	As above, this is not something you can quantify from a traffic model. You can infer that the improved roundabout intersection will discourage drivers from using shortcuts but a traffic model will not tell you how many drivers will avoid the shortcut.

Road/Nicholson Road intersection.	
An investigation of options for relocating the main entrance to the industrial area so that it is offset from the Blair Road intersection.	This work has not been undertaken as part of the updated TIA given the extensive planning background to date which confirmed the identified location of the intersection as a roundabout, and that this is the most appropriate location factoring in the spread and offset of intersection along the Stage 1 and Stage 2 frontage. This approach is consistent with the Stage 1 upgrade to the Kargotich Road intersection and was confirmed via the Amendment to the MRS and Armadale TPS 4. Relocating the roundabout would compromise the future road network. An offset intersection arrangement is not preferred given large offset distances need to be considered for full movement turns onto a Primary Distributor Road. It would also be the expectation of MRWA that the number of intersections to Rowley Road should be limited given industrial traffic movements. Given prior commitment and approvals for the intersection location, further design testing is not an appropriate response for this stage of the planning process, which is further supported by the relatively low level of traffic using Blair Road on a daily basis, and use of this road being well within capacity.
Identification of possible traffic restriction measures that could be put in place to discourage traffic from the industrial area using Blair Road.	As noted in the attached TIA, speed humps or single lane treatments would provide sufficient deterrence from unwanted through movements. The 5.5m pavement width and rural grade nature of Blair Road will also be a deterrent to the use of this road for industrial traffic.

Proposed zones and reserves under the Draft Structure Plan

It is considered that the zones and reserves proposed on the Draft Structure Plan are appropriate for the expected future developments within the Business Park and will enable a vast range of land uses. The Industrial Business zone at the Rowley Road end of the Business Park will provide a transition zone between the more intensive General Industrial zone and the Rural Residential properties on the south side of Rowley Road. Proposed buffer areas for Parks and Recreation will help to prevent industrial development encroaching into those buffer areas.

Rowley Road Widening

Reference to “acquisition” of the road widening for Rowley Road should be removed from section 4.2.6 (page 10 of the applicant’s Structure Plan Report Part 1 Implementation). In Stage 1 (condition of Subdivision Approval), the WAPC required this land to be required to be ceded free of cost.

Western Power Easement
Section 4.2.8 (i) to be modified to require any proposed development under the powerlines to also be to the satisfaction of the City as the City will be required to manage any infrastructure developed under the powerlines such as drainage infrastructure and Public Open Space.

Development Contribution Plan (DCP)
Section 4.2.9 of the applicant's Structure Plan Report Part 1 Implementation states that a DCP will be required for the provision of infrastructure shared by Stage 1 and Stage 2 for:

- Distributor Roads;
- Rowley Road widening and upgrades;
- Rowley Road intersections; and
- Service infrastructure.

Funding of and recouping costs for the above items should be by via private agreements between the owners of Stages 1 and 2. Services are the responsibility of the landowners and State Government agencies and not a DCP administrated by local government. The City has advised for over 10 years that it will not be managing a DCP for this infrastructure.

Revegetation and planting within drainage infrastructure
A number of conflicting recommendations have been identified with regard to revegetation requirements and vegetation of drainage infrastructure in some of the documents lodged with the Structure Plan, in particular the Bushfire Management Plan and the Local Water Management Plan. These include:

Page 9, 4.2.4 of Structure Plan Report Part 1 Implementation states:

A Bushfire Management Plan (BMP) is included as Appendix 5 to the Structure plan which outlines management measures for the development of land including separation of habitable buildings from areas identified as BAL-40 and above, ***management of vegetation in a low threat standard****, the provision of two vehicle access points and the provision of a water supply and associated infrastructure.*

The BMP states:
Page i - *As a result of the development the existing vegetation is expected to be modified as follows: d) Revegetation of the drainage compensation basins (for flood control) with grassland vegetation.*

Page 34 - *6) Grass should be maintained at a height of 100 millimetres or less, at all times. Wherever possible, perennial grasses should be used and well-hydrated with regular application of wetting agents and efficient irrigation.*

If swales were grassed the requirement to maintain the height of the grass at 100mm would be too onerous from a management perspective for the City to maintain, with limited benefit in a business park. In addition, this is not consistent with the Local Water Management Strategy which states:

- *Use of local native vegetation species in swales, drainage management areas and streetscapes to reduce nutrient input and conserve water resources.* (page 9); and

- *Drainage areas have separate bio-retention areas (BRAs), with native plants selected for nutrient stripping, consistent with Monash University (2014). (Page 25 section 8.1).*

It is recommended that a review of all the documents lodged with the Structure Plan be undertaken to ensure consistency between recommendations and proposals contained in each document. The City will recommend a modification to the Structure Plan documents that requires nutrient stripping vegetation in drainage swales and basins.

ANALYSIS

The Structure Plan and technical reports have been reviewed by the City and the main areas of consideration and concern for the City are discussed below. The identified issues and recommended modifications are further detailed in the Schedules of Issues and Modifications in the Report Attachments.

Assessment Against Legislative and Policy Requirements

Town Planning Scheme No.4 (TPS No.4)

The subject site is zoned Industrial Development under TPS No.4. Under TPS No.4 the purpose of the Industrial Development Zone is:

(a) To designate land for future industrial development; and
(b) To provide a basis for future detailed planning in accordance with the structure planning provisions of this Scheme.

Schedule 8 of TPS No.4 identifies the subject site as Development Area No.46 'South Forrestdale Industrial Area' and details additional provisions applicable to preparation of the Structure Plan, subdivision and development. The table below sets out each of the provisions contained in Schedule 8 for this Development Area and addresses whether the Structure Plan and associated documents comply.

TPS No. 4, Schedule 8 Provisions for Development Area 46	**Compliance**
46.1 Subdivision and development should be generally consistent with a Structure Plan for Development Area 46 – Rowley Road Industrial Area to be prepared pursuant to Part 4 of the Deemed Provisions.	A provision of the Structure Plan requires subdivision to be generally in accordance with approved plan.
46.2 A transport assessment shall be prepared in accordance with applicable Western Australian Planning Commission Guidelines.	Transport assessment lodged with application. Most revisions requested by the City and Main Roads WA have been made to the document. Modifications are recommended to the Structure Plan and Traffic Impact Assessment to include additional identification of possible traffic measures that could be in place to discourage traffic from the industrial area using Blair Road.
46.3. The Structure Plan shall make adequate provision for the protection of adjoining Conservation Category	a. Structure Plan includes buffers to environmentally sensitive elements including wetlands, Bush Forever sites

Wetlands, Bush Forever land and Regional Parks and the Resource Enhancement Wetland on Lot 8 Rowley Road to the satisfaction of the Environmental Protection Authority and the local government through – *a. The provision of appropriate buffers between future industrial development and the Bush Forever site and Conservation Category Wetland on Lot 12 and environmentally sensitive areas abutting the northern boundaries of Lots 5, 7 and 9 Oxley Road. The buffer areas are to be detailed on the Structure Plan. The extent/width of the buffers is to be to the satisfaction of the EPA and the DBCA.* *b. A Buffer Management Plan for the buffer areas determined by the EPA and DBCA. The Buffer Management Plan is to address the retention of any native vegetation within the buffer, revegetation of cleared areas, bushfire management, access and drainage. The Buffer Management Plan is to be prepared in consultation with the Department of Biodiversity, Conservation and Attractions to the satisfaction of the local authority.* *c. At the Subdivision stage, the land identified for buffer areas is to be ceded free of cost as reserves for Public Open Space and Drainage.*	and other conservation reserves. Width of buffers was determined at Metropolitan Region Scheme amendment stage (buffers left in Rural zone) and in Local Scheme Amendment (buffers left in Rural Living zone. b. Requirement for a Buffer Management Plan is included as a provision of the Structure Plan. DBCA has raised matters about a Conservation Category Wetland and the lack of consultation by the applicant's with DBCA. The applicant has not demonstrated that engagement has occurred with DBCA. The matter is still to be resolved. c. Part c. of this provision will be addressed at the subdivision stage of development.
46.4 The Structure Plan for Development Area No.46 - Rowley Road Industrial Area shall: *a. include a servicing report detailing load demand and indicative network augmentation / reinforcement requirements for review and ratification by Western Power;* *b. delineate the Western Power registered easement and* *i transmission infrastructure;* *ii include detailed designs and*	a. A Servicing Report was lodged with the Stage 2 application. b. The Western Power easement is within Stage 1. c. A Local Water Management Strategy has been lodged with both the City and the Department of Water and Environmental Regulation for approval.

information for review, assessment and written consent of Western Power to any proposals below, if applicable, within the registered easement, in accordance with standard easement conditions: • *Landscaping plans (including mature heights and location of species);* • *Ground level changes;* • *Permanent structures;* • *Drainage plans;* • *Conservation controls.* c. *A Local Water Management Strategy which, in addition to standard matters, addresses the location and design of any proposed stormwater drainage features within the buffer. The Local Water Management Strategy is to be prepared in consultation with the Department of Water and Environmental Regulation to the satisfaction of the local authority.*	

City of Armadale Retail (Commercial) Centres Strategy 2020

Industrial areas including the proposed Doobarda Business Park are included as Activity Centres in the City's Retail (Commercial) Centres Strategy 2020 (adopted by Council at their meeting on 14 December 2020) as they do include in some instances Shop Retail and generally in all instances Other Retail, which usually takes the form of Bulky Goods Showrooms. The Strategy identifies a floorspace for Other Retail of approximately 16000m^2 by 2041 (development commencing from approximately 2021) but does not allow for any Shop Retail floorspace.

There are several proposed and existing shopping centres (within the Wungong Urban Area) which will adequately accommodate the Shop Retail needs of the adjacent residential areas, and it is important not to diminish the capacity/viability of those centres by also allowing excessive Shop Retail in the Doobarda Business Park. Any Shop Retail proposed should comprise businesses that address the needs of an industrial area such as work clothing, convenience store, lunch bars and the like. Shop Retail in the form of supermarkets would not be appropriate in an area without a residential population.

Local Planning Policies

A number of Local Planning Policies (LPP's) apply to development of this industrial area including:

PLN 2.4 Landscape Feature and Tree Preservation
PLN 2.6 Water Sensitive Design
PLN 2.9 Landscaping
PLN 4.1 The Design of Industrial Sites and Estates

As per the identified parameters within the "Application of the Policy" part of each policy, these policies are predominantly applied during the Structure Plan and Subdivision stages of the planning processes which is when detailed design of the layout of the estate is carried out. The provisions of these policies will impact such elements as road layout, drainage methods and public open space locations. For example, at this current Structure Planning stage PLN 2.4 Landscape Feature and Tree Preservation will be implemented through the identification of Public Open Space areas within Stage 2 that will enable retention of existing vegetation and the design of the alignment and widths of road reserves to enable the retention of trees within verges and medians where possible. The Local Water Management Strategy (LWMS) lodged with the Structure Plan details how the developers will implement the requirements of PLN 2.6 Water Sensitive Design. PLN 2.9 Landscaping is generally implemented at the Development Application stage for individual lots but will also be implemented through the preparation of Landscape Plans for Public Open Space Areas and tree planting within verges and medians in roads during the subdivision process. PLN 4.1 The Design of Industrial Sites and Estates is specific to the subdivision design stage of development.

PLN 2.4 Landscape Feature and Tree Preservation (PLN 2.4)
PLN 2.4 aims to achieve the preservation of significant trees as part of development proposals, including Structure Plans. The Environmental Assessment Report lodged in support of the Structure Plan claims that the vegetation recorded across the Structure Plan area is in completely degraded condition. This means there is minimal to no understorey present and no intact vegetation complexes. There are however some trees scattered throughout the development area, predominantly *Melaleuca preissiana* (Paperbark) trees. The site also contains a very small amount of habitat for Black Cockatoos with a small stand of Marri trees potentially providing foraging habitat and one (1) Marri tree that is old enough to be suitable for breeding by Black Cockatoos.

The applicant's Environmental Assessment report does not propose any specific measures or plans to preserve existing vegetation outside of the buffer/POS areas. However, the Structure Plan includes areas of public open space for buffers and drainage across the Structure Plan area, as well as the retention of a section of unconstructed road reserve abutting Lot 7 which includes some remnant vegetation. Where drainage areas are unconstrained by earthworks the Environmental Assessment states existing vegetation will be retained if possible.

It is recommended that the developer be required to lodge a Local Landscape Feature and Tree Retention Strategy to the satisfaction of the City prior to the WAPC approving the Structure Plan. The requirements for a Local Landscape Feature and Tree Retention Strategy should be prepared in consultation with the City and include the information set out in PLN 2.4.

PLN 2.6 Water Sensitive Design (PLN 2.6)
PLN 2.6 sets out to integrate quality urban development with the natural environment via the implementation of water sensitive design principles during the planning process, including Structure Plans.

PLN 2.6 provides guidance on best management practice to protect watercourses and ensure that stormwater is maintained appropriately. Informed by the overarching District Water Management Strategy, the Local Water Management Strategy (LWMS) has been prepared by JDA Consulting Hydrologists as part of this Structure Plan (Appendix 1). The LWMS sets out the water sensitive design principles that have informed the preparation of the Structure Plan, in accordance with PLN 2.6.

PLN 2.9 Landscaping (PLN 2.9)
PLN 2.9 applies to all Structure Plan proposals where a landscaping and revegetation plan is required to be prepared under TPS No.4. The objectives of PLN 2.9 are to conserve and enhance the natural environment and provide guidance on requirements for landscaping design and the selection of appropriate species.

PLN 2.9 is generally implemented at the Development Application stage for individual lots but will also be implemented through the preparation of Landscape Plans for Public Open Space Areas and tree planting within verges and medians in roads during the Subdivision process.

PLN 4.1 The Design of Industrial Sites and Estates (PLN 4.1)
PLN 4.1 is specific to the subdivision design stage of development, setting out to achieve and maintain a high standard of development, visual amenity and vehicle permeability throughout industrial areas, including land zoned Industrial Development.

PLN 4.1 ensures these objectives are achieved by requiring development to be to a high standard, with unsightly development screened from view from the surrounding area, and ensuring convenient, functional and safe vehicle access into and out of industrial sites.

State Planning Instruments
The following State Planning instruments are relevant to the assessment of the proposal:

Metropolitan Region Scheme (MRS)
The subject land is now predominantly contained within the 'Industrial' zone under the MRS. The MRS Amendment assessment process resulted in land for the future widening of Rowley Road reservation being left in the Rural zone under the MRS at the request of Main Roads WA and the Department of Planning, Lands and Heritage. This will enable the road reserve for Rowley Road to be widened to 50 metres in the future. The road widening areas retaining the Rural zone under the MRS will retain a 'Rural Living' zoning under TPS No.4 through this scheme amendment.

The ‘Rural’ zone under the MRS was also retained over portions of the lots comprising Stage 2 that contain environmental assets or required buffers between the environmental assets and future industrial development. This was also reflected in Amendment No.116 to TPS No.4.

Directions 2031 Strategy
The Directions 2031 Strategy identifies Priority Industrial sites to meet demand for industrial land over the coming 20 years, to provide employment land supporting economic growth and a balanced distribution of employment across the Perth and Peel regions.

The subject land is identified as a Priority Industrial site, which will substantially contribute to meeting metropolitan employment and economic growth needs, along with the needs of households. The Strategy identifies a need to provide a balanced distribution of industrial centres across Perth to reduce freight handling and improve the provision of products and services for the broader community into the future. The timely delivery of lots for general industry and industrial business development on the subject land will serve to meet the intent of the Strategy.

The Directions 2031 Strategy identified six sub-regional planning areas for distinct planning and policy development measures. The south-east sub-region is estimated to experience

population growth of up to 228,000 persons, being a 34 per cent increase on current population levels. The Strategy also identifies an employment self-sufficiency target of 55 per cent for the sub-region, requiring 31,000 new jobs by 2031. In order for this to be realised, concerted action will be required over the next two decades to deliver these jobs.

Economic and Employment Lands Strategy (Non-Heavy Industrial) for Perth and Peel (WAPC, 2012)
The Economic and Employment Lands Strategy 2012 (EELS) identified several locations where future industrial sites may be considered to accommodate future demand and economic growth in the south-east sub-region, in response to and in order to achieve the following:

• Population growth;
• Sustained levels of economic growth and employment targets;
• Improved freight infrastructure; and
• De-constraining existing industrial land.

The subject land was included within an area identified as a medium term non-heavy industrial site (4-10 years/2016-2022) under EELS.

The EELS Strategy states the predominant type of industrial development for the Doobarda site (formerly known as South Forrestdale in the EELS document) will include general industrial development. However, it also states that some of the site should also be zoned 'Industrial Business' to enable the provision of additional employment opportunities for nearby residential areas (both existing and future). In this regard, the EELS Strategy identifies land uses such as commercial vehicle parking, storage and warehousing along with activities such as recreation-public, garden centre and showrooms. The land use mix in Stage 2 as per the draft Structure Plan includes Industrial Business, Industry – Light and Industry – General.

Perth and Peel @ 3.5 Million – South Metropolitan and Peel Sub-Regional Planning Framework
The South Metropolitan Peel Sub-Regional Planning Framework was published in 2018 and identifies Stage 1 of the industrial area as Industrial (as the land had already been zoned for Industrial development at both the MRS and TPS levels) and the land that will comprise Stage 2 as Industrial Expansion. This was because at the time the MRS and TPS amendments relating to Stage 2 of South Forrestdale had not been commenced.

State Planning Policy 4.2 - Activity Centres
State Planning Policy 4.2 Activity Centres for Perth and Peel (SPP 4.2) sets out broad planning requirements guiding the development of new and existing activity centres. With regards to land for industrial purposes, the policy aims to ensure that the key uses for industrial land are to be maintained and commensurate with industrial purposes. The draft Structure Plan includes an area of Industrial Business zone adjacent to the Rowley Road frontage of Stage 2. This zone is an appropriate transition zone between industrial areas and adjacent sensitive land uses (such as residential, rural-residential) and in this instance the wide Rowley Road reserve also provides a buffer to the sensitive land uses south of Rowley Road and any uses in the Industrial Business zone.

It is likely that the types of land uses that will be developed in the Industrial Business zone will be businesses such as fast-food, service industrial such as Vehicle Repairs (tyre fitters, car servicing etc), Convenience Store/Fuel Outlets, Car/Boat/Caravan Sales, hardware

stores/warehouses and personal protective gear/work clothing stores, which are usually seen on the periphery of other industrial areas around the Perth Metropolitan area.

Proposed Northern Road Connection – Stirling Road to Forrest Road
The Structure Plan identifies a road connection from Stage 2 north to Oxley Road and Stirling Road and subsequently Forrest Road. It is recommended that the proposed local road connection be removed from the Structure Plan for the following reasons:

- Stirling Road is an unsealed local road that provides access for only four Rural Living zoned properties (via Oxley Road and Stirling Road) north to Forrest Road.
- The extension of Oxley Road (west of Stirling Rd) appears to be a mapping error, which the applicant has verbally acknowledged at a meeting with the City held on 7 January 2026. This section of road isn't constructed and there is no intention that the developer will construct it. More importantly, the unconstructed road reserve contains remnant vegetation and abuts Parks and Recreation reserves. There is an opportunity for the road reserve to be closed and the reserve amalgamated with the adjoining Parks and Recreation reserves.
- Forrest Road to the north runs through a future urban area that has been rezoned to Urban under the Metropolitan Region Scheme and with a local scheme amendment (Amendment 127 to TPS 4) in progress to rezone the area to the Urban Development zone. This future urban area will accommodate approximately 600 dwellings. It would not be appropriate to enable vehicle access from the industrial area to Stirling Road, Forrest Road through to Armadale Road, as the local roads are not suitable for industrial traffic and the likely safety issues for new residents, given the conflict between future residential areas with 300-450m2 lots with pedestrians and industrial traffic.
- Stirling Road and Oxley Road will not be upgraded or sealed by the developers of Stage 2 as they have not proposed to fund these works, these roads are not a designated heavy vehicle route and the City at this time does not have any intention to seal these roads.
- All heavy vehicle traffic needs to use the designated heavy vehicle routes of Rowley Road, Tonkin Highway and Nicholson Road to access Armadale Road and the wider road network.

Recommended Modifications to the Draft Structure Plan
Assessment of the Structure Plan documents by City staff and government agencies has identified a number of matters that still need to be resolved prior to the Structure Plan being approved by the Western Australian Planning Commission. Below the main outstanding issues are detailed. A Schedule of Modifications (see attached) has also been prepared to detail all modifications required including minor and major requirements.

Prior to WAPC approving the Structure Plan the following matters need to be addressed/resolved:

- Lodgement of a Local Landscape Feature and Tree Retention Strategy to the satisfaction of the City prior to the WAPC approving the Structure Plan. The requirements for a Local Landscape Feature and Tree Retention Strategy must be prepared in consultation with the City and include the information set out in PLN 2.4.
- Resolution of Main Roads WA’s requirements for the upgrade of Rowley Road. There is currently a conflict between what Main Roads WA required from the developers of Stage 1 and what they are now asking Stage 2 developers to provide. Main Roads WA are requesting additional road widening among other upgrades when Main Roads WA do not have a design for the ultimate upgrade of the road and cannot provide an estimate of

when this information will be available. This requirement could significantly delay development of Stage 2.

- Resolution of buffer requirements for adjacent wetlands. DBCA are requesting additional buffer width based on their reassessment of the boundary of the CCW located north of Oxley Road (as set out in the report on the CCW attached to their submission previously provided by DBCA to affected landowners). This may require modifications to the Structure Plan and Buffer Management Plan. A provision in Schedule 8 of the TPS requires buffers to be shown on both the Structure Plan and Buffer Management Plan and to be to the satisfaction of the EPA and DBCA.
- Identification in the Traffic Impact Assessment and Structure Plan Report Part 1 (Implementation) of possible traffic restriction measures that could be put in place to discourage traffic from the industrial area using Blair Road. This should also form a condition of any future subdivision application with clearance of the condition to be to the satisfaction of the Shire of Serpentine Jarrahdale as this local road is within the Shire boundary.
- Removal of the proposed road connection from Stage 2 north to Stirling Road and subsequently Forrest Road.
- Clearly identify on the Structure Plan map that Oxley Road (west of Stirling Rd) is unconstructed and that there is no intention for it to be constructed in the future as it does not provide access to the west at present. Potential for this portion of Oxley Road to be closed and the reserve amalgamated with the adjoining Parks and Recreation reserves.
- Removal of the following from the Structure Plan Report Part 1 – Implementation
  - page 10 4.2.6 – reference to acquisition of the road widening for Rowley Road. The WAPC required Stage 1 to cede the land free of cost as a condition of subdivision approval. A similar approach should apply.
  - Page 10 4.2.8(i) adding “and to the satisfaction of the City.”.
  - Page 10 4.2.9 – remove whole section as a Development Contribution Plan is not required by the City and funding of shared infrastructure costs will be subject to a private agreement between owners of Stage 1 and Stage 2.
- Revision of all the documents lodged with the Structure Plan to ensure consistency between recommendations and proposals contained in each document. For example, there are inconsistencies between the Bushfire Management Plan recommendations for planting in drainage basins (grassed) and the requirement for basins to contain nutrient stripping vegetation contained in the Local Water Management Strategy. The City will require vegetated drainage swales and basins for nutrient stripping and environmental improvement and will not accept management of extensive grassed swales with a requirement for 100mm grass maintenance for BAL ratings.
- Some minor text changes to correct information in the lodged documents.

Future Processes

Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015* provides the process for the Structure Plan assessment and determination. The report to be submitted to the WAPC on the proposed Structure Plan must include the following —

(a) a list of the submissions considered by the local government, including, if relevant, any submissions received on a proposed modification to the structure plan advertised under clause 19(2);
(b) any comments by the local government in respect of those submissions;
(c) a schedule of any proposed modifications to address issues raised in the submissions;
(d) the local government’s assessment of the proposal based on appropriate planning principles;

(e) a recommendation by the local government on whether the proposed structure plan should be approved by the Commission, including a recommendation on any proposed modifications.

Council's role and the purpose of this report is set out in bold at point (e) above. The WAPC is then required to make a determination to approve, modify or refuse the Structure Plan within 120 days of receiving the Structure Plan, or a longer period as may be required. The DPLH on behalf of the WAPC with or without City involvement, may decide to negotiate with the applicant on issues and modifications at their discretion before making its recommendation on the Structure Plan to the WAPC. Once Council makes its recommendation to the WAPC, then the City will advocate to the DPHL/WAPC for the Council's decision to be implemented.

OPTIONS

1. Council may resolve to recommend to the Western Australian Planning Commission (WAPC) to approve the Structure Plan with or without modifications.

2. Council may resolve to recommend that the WAPC refuse the Structure Plan and giving reasons for the recommendation.

CONCLUSION

Approval of the Structure Plan for Stage 2 of the Doobarda Business Park will enable the developers to move to the next stage of development being subdivision. Additional industrial land such as the subject site, located on key east-west transport routes, will provide a local employment option for people within the south-eastern sector and assist in addressing the current deficit in employment opportunities in the south-east corridor.

Assessment of the Structure Plan by the City and State Government agencies and consideration of submissions received during the advertising period has identified that modifications should be made to the Structure Plan documents prior to the Structure Plan being approved by the WAPC. It is recommended that Council recommend to the WAPC that the Structure Plan be modified in accordance with the Schedule of Modifications prior to approval in accordance with Option 1 above.

RECOMMEND

That Council:

1. **Endorse the comments made in this report, the Schedules of Submissions and the Schedule of Modifications attached to this report in response to advertising, agency referral and assessment of the Structure Plan.**

2. **Pursuant to Schedule 2 Clause 20 of the *Planning and Development (Local Planning Schemes) Regulations 2015*:**

   a) **Forward this report and attachments (including Schedule of Submissions and Schedule of Modifications) to the Western Australian Planning Commission; and,**

   b) **Recommend that the Western Australian Planning Commission approve the proposed Doobarda Business Park Stage 2 Structure Plan, subject to the modifications listed in the Schedule of Modifications attached to this report.**

3. **Advise submitters and applicant of this decision of Council.**

ATTACHMENTS

1. Aerial Photo
2. Proposed Structure Plan
3. Proposed Structure Plan Map
4. Vegetation Type Plan
5. Vegetation Condition Plan
6. Road Hierarchy Plan
7. Drainage and POS plan
8. Schedule of Submissions
9. Confidential Schedule of Submitters Names and Addresses - *This matter is considered to be confidential under* Section 5.23(2) (b) *of the Local Government Act, as the matter relates to the personal affairs of a person*
10. Confidential Submitter plan - *This matter is considered to be confidential under* Section 5.23(2) (b) *of the Local Government Act, as the matter relates to the personal affairs of a person*
11. Schedule of Structure Plan Issues and Modifications
12. Doobarda City of Armadale Engage Page Attachment Links

4.1 - PROPOSED AMENDMENT NO.130 TO TOWN PLANNING SCHEME NO.4 - OMNIBUS NO.9

WARD	:	ALL
FILE No.	:	M/815/25
DATE	:	11 FEBRUARY 2026
REF	:	GW/PR
RESPONSIBLE MANAGER	:	Executive Director Development Services
APPLICANT	:	City of Armadale
LANDOWNER	:	Various
SUBJECT LAND	:	Various
ZONING MRS / TPS No.4	:	Various

In Brief:

- The City of Armadale is initiating an Omnibus (Standard) Amendment to Town Planning Scheme No.4 ensure the scheme remains current, relevant, and aligned with evolving planning legislation, practices, and minor corrections.
- The omnibus amendment comprises four proposals, which seek to: (i) rectify identified mapping anomalies on the Scheme maps; (ii) repeal or update outdated or redundant provisions in the Scheme text; (iii) ensure consistency with current Metropolitan Region Scheme (MRS) terminology; and (iv) delete Clause 61(1)(r) from Schedule A-Supplemental Provisions to remove the broad exemption for vegetation removal.
- Recommend that Council initiate the proposed Amendment, forward the Amendment to the Environmental Protection Authority and Minister for Planning for consent to advertise the Amendment for public comment.

Tabled Items

Nil.

Decision Type

☒ **Legislative**	The decision relates to general local government legislative functions such as adopting/changing local laws, town planning schemes, rates exemptions, City policies and delegations etc.
☐ **Executive**	The decision relates to the direction setting and oversight role of Council.
☐ **Quasi-judicial**	The decision directly affects a person's rights or interests and requires Councillors at the time of making the decision to adhere to the principles of natural justice.

Officer Interest Declaration

Nil

Strategic Implications

2.5 Quality development that has preserved amenity, sustainability, and local character.
2.5.1 Align the Land Use Planning framework with the City's strategic objectives, facilitating sustainable design and development.

Legal Implications

Planning and Development Act 2005
Planning and Development (Local Planning Schemes) Regulations 2015 (LPS Regulations)
Metropolitan Region Scheme (MRS)
Town Planning Scheme No.4 (TPS4)

Council Policy/Local Law Implications

Local Planning Strategy 2016
Urban Forest Strategy 2014

Budget/Financial Implications

Nil.

Consultation

As a standard amendment consistent with Part 5, Division 3 clause 47 of the LPS Regulations public advertising for a minimum period of 42 days is required.

BACKGROUND

The City of Armadale's Town Planning Scheme No. 4 (TPS4) has undergone numerous amendments to reflect evolving planning needs, development progress, legislative changes and minor corrections. Omnibus amendments combine multiple minor or administrative matters for efficiency, avoiding separate processes.

Proposals 1 & 2 in this amendment were originally part of Amendment No. 122 – Omnibus No. 8 (a basic amendment). The Western Australian Planning Commission (WAPC) requested their removal, as they did not meet 'basic' criteria and require processing as a 'standard' amendment under the *Planning and Development (Local Planning Schemes) Regulations 2015*. This standard omnibus amendment addresses those outstanding items and includes two new proposals (Proposal 3 and 4) to maintain an up to date, accurate, and effective scheme.

DETAILS OF PROPOSAL

This standard omnibus amendment to TPS4 comprises 4 key proposals:

1. Minor mapping corrections to resolve anomalies from closed pedestrian access ways and two incorrectly reserved lots (Maps 1–11).

2. Removal of obsolete Additional Use No. 35 from fully developed residential lots and reclassification of two lots to reflect their current use (Parks & Recreation (Local) and Public Purpose – Public Utilities).

3. Alignment of the TPS4 map legend with updated Metropolitan Region Scheme (MRS) terminology.

4. Text amendment to Clause 61(1)(r) in Schedule A to require development approval for the removal of trees that meet the criteria specified in an adopted local planning policy.

COMMENT

Proposal 1 (Maps 1-11)- Mapping corrections
These eleven modifications correct minor anomalies in the Scheme Maps arising from the closure of Pedestrian Access Ways (unzoned land) and two incorrectly reserved lots. Each is administrative in nature, reflects an existing or approved situation on the ground, and has no impact on current land use or land beyond this amendment.

These corrections were originally included in Amendment No. 122- Omnibus No. 8 (formerly referred to as Proposal 4 – Maps 2-12) but were removed at the request of the WAPC as they did not meet the criteria for a 'basic' amendment and require consideration as a 'standard' amendment.

Details of each proposal are outlined in the table below:

Proposal No.	Location	Existing Zoning	Proposed Zoning	Justification
Proposal 1 – Map 1	Lot 2598 Millen Street, Mount Nasura	Parks & Recreation (Local)	Residential R10/25	Lot incorrectly zoned for Parks and Recreation. The lot is privately owned and developed for residential purposes – contiguous with adjoining Lot 107 to the west.
Proposal 1 – Map 2	A portion of Lot 155 Sherwood Court, Armadale (former PAW)	Parks and Recreation (Local)	Residential R40	A portion of a residential lot incorrectly zoned for Parks and Recreation. The former Public Access Way has been closed.
Proposal 1 – Map 3	A portion of Lot 1104 Pomelo Way, Seville Grove (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 4	A portion of Lot 558 Felgate Court and Lot 555 Becket Court, Camillo (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 5	A portion of Lot 1187 Armanda Drive and Lot 555 O'Sullivan Drive, Camillo (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 6	A portion of Lots 1 and 2 Possum Place, Kelmscott (former PAW)	Unzoned	Residential R10/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been

Proposal No.	Location	Existing Zoning	Proposed Zoning	Justification
				closed.
Proposal 1 – Map 7	A portion of Lot 1678 Berala Court, Camillo (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 8	A portion of Lot 280 Drayton Court, Kelmscott (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 9	A portion of Lot 250 Carringal Place, Armadale (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 10	A portion of Lot 100 Clybucca Place and Lot 1719 Urana Road, Armadale (former PAW)	Unzoned	Residential R15/25	Land is unzoned and should be included in Residential zone, as the former Public Access Way has been closed.
Proposal 1 – Map 11	Lot 55 Shepherd Court, Harrisdale	Unzoned	Urban Development	A residential subdivision (WAPC Ref: 161764) has been approved over an existing Public Access Way between Sherpard Court and Hatch Court and is consistent with the approved Structure Plan. Council supported the Public Access Way closure and arrangements are progressing with the subdivider to finalise its closure. The land should be rezoned to Urban Development zone.

Proposal 2 - Remove Additional Use No.35 from Residential zoned land and reclassification of land

This proposal includes 4 modifications (3 mapping and 1 minor text change) to rationalise the Scheme Map and remove the Additional Use No.35 hatching from all residential zoned lots that have been subdivided/developed for residential purposes, including:

1. Removal of Additional Use No.35 from Residential zoned lots;
2. Reclassification of Lot 8001 (Reserve 53732) Emporium Way, Piara Waters from "Residential R15/40" to 'Parks & Recreation (Local)";
3. Reclassification of a portion of Lot 1101 Columbia Parkway, Piara Waters from "Residential R15/40" to "Public Purpose – Public Utilities (PU)";
4. Modify the 'Description of Land' details for Additional Use No. 35 under Schedule 2 to update current lot details.

This proposal was originally included in Amendment No. 122- Omnibus No. 8 (formerly referred to as Proposal 2 – Map 2) but were removed at the request of the WAPC as they did not meet the criteria for a 'basic' amendment and require consideration as a 'standard' amendment.

Further justification for each modification is outlined in the table below:

Location	Existing Zoning	Proposed Zoning	Justification
Lots 417-424 & Survey Strata Lots 1-8 (No.18) Erade Drive, Piara Waters; Lots 1000, 1001, 1002 Jayes Road, Piara Waters; Lots 1021-1024 Genomics Rise, Piara Waters; Lots 1003-1015 & 1025-1036 Research Avenue, Piara Waters; Lots 407-416 Wardle Court, Piara Waters; Lots 425-435 & 402-406 & Survey Strata Lots 1-8 (No.23) Frost Bend, Piara Waters; Portion of Lot 1101 Columbia Parkway, Piara Waters; Lot 8001 (Reserve 53732) Emporium Way, Piara Waters	Residential R15/40 - Additional Use No.35	Residential R15/40 (Remove Additional Use No.35 hatching)	The subject lots have been fully subdivided into individual residential lots and developed accordingly for residential purposes. As a result, the provisions of Additional Use No. 35, which originally permitted a range of non-residential land uses (including commercial, retail, mixed-use, and other activities), are no longer relevant or appropriate in this context. These non-residential uses are now incompatible with the established residential character, zoning objectives, and amenity of the subdivided lots. Removing Additional Use No. 35 from the subject lots is therefore necessary to protect residential amenity, prevent inappropriate development, and ensure that all future land use and development aligns consistently with the residential zoning and prevailing character of the area. Additional Use No. 35 will continue to apply unchanged to the adjacent Local Centre zone (outside the amendment area). This includes key commercial hubs such as the C.Y. O'Connor Village and Piara Village Shopping Centre (Lots 1, 1017, 1018, 1019 and 1020 Erade Drive, and portion of Lot 1102 Warton Road, Piara Waters), preserving their intended role as mixed-use and activity focal points within the broader CY O'Connor Village structure plan area.

Location	Existing Zoning	Proposed Zoning	Justification
			This amendment reflects the completed transition of the subject lots from potential mixed-use/development to established residential, while maintaining appropriate flexibility and non-residential opportunities in the designated local centre zone.
Lot 8001 (Reserve 53732) Emporium Way, Piara Waters	Residential R15/40 (Additional Use No.35)	Parks & Recreation (Local)	The lot was created for local Public Open Space purposes under WAPC subdivision approval (Ref: 157810) and is now a Crown Reserve utilised for Recreation and Drainage purposes.
Portion of Lot 1101 Columbia Parkway, Piara Waters	Residential R15/40 (Additional Use No.35)	Public Purpose-Public Utilities (PU)	The subject lot is owned by the Water Corporation and contains distribution main infrastructure. Reclassifying this portion to Public Purpose reflects its current use as Public Utilities, consistent with the remainder of Lot 1101.

In addition to the three mapping modifications outlined above, the 'Description of Land' details for Additional Use No. 35 under Schedule 2 of the scheme text requires modifying to reflect the current lot details from "Part of Lot 114 Warton Road and part of Lot 3 Nicholson Road, Forrestdale" to "Lots 1, 1017, 1018, 1019 and 1020 Erade Drive, and portion of Lot 1102 Warton Road, Piara Waters".

Proposal 3 – Amendment to TPS No. 4 Map Legend to Align with MRS Reservations
Metropolitan Region Scheme Amendment (MRS) 1431, approved in 2025 and effective from 6 June 2025, updated the MRS map legend and terminology for clarity and consistency.

To ensure alignment with MRS terminology, the TPS No.4 map legend requires corresponding updates, including the following modifications:

1. Amend "Parks and Recreation (Region)" to "Regional Open Space".

2. Amend the Public Purposes category "Technical School (TS)" to "Tertiary Education (TE)".

3. Delete the outdated Public Purposes categories "State Energy Commission (SEC)" and "Water Authority of WA (WSD)" and replace with "Public Utilities (PU)".

These changes are administrative in nature and do not alter any underlying reservations of land.

Proposal 4: Delete Clause 61(1)(r) from Schedule A- Supplemental Provisions to the Deemed Provisions
This proposal involves the deletion of Clause 61(1)(r) from Schedule A of TPS No.4. The current clause exempts the "removal of vegetation except where approval of such development is otherwise required by the provisions of the scheme." This broad exemption is

superfluous given the extensive and targeted tree and vegetation protection mechanisms already provided within TPS No.4.

Additionally, Clause 61(1)(r) does not form part of the standard Model provisions (set out in Schedule 1 of the *Planning and Development (Local Planning Schemes) Regulations 2015*) nor the Deemed Provisions (set out in Schedule 2 of the Regulations). Schedule 1 provides the Model provisions for the structure and content of local planning schemes, while Schedule 2 contains the Deemed Provisions that automatically apply to and form part of every local planning scheme (overriding any inconsistent local provisions where applicable). The standard Deemed Provisions in Schedule 2 include Clause 61, which lists various exemptions from the requirement for development approval in a table format under subclause (1). However, there is no subclause (1)(r) or equivalent exemption specifically for the "removal of vegetation" in the prescribed Deemed Provisions. Its inclusion in Schedule A of TPS No.4 therefore represents a local supplemental variation that is unnecessary, creates potential inconsistency with the standardised framework under the Regulations, and deviates from the preferred approach of relying on the core Deemed Provisions combined with scheme specific protective controls rather than broad, overlapping exemptions.

Retaining this clause creates unnecessary overlap and potential inconsistency, as it allows vegetation removal (including trees) without development approval in broad circumstances, particularly in residential areas or infill sites where single house developments may otherwise be exempt. Deleting it ensures that vegetation removal is only exempt where not captured by the scheme's specific protective provisions, promoting stronger, more consistent tree retention outcomes.

Importantly, deletion of this broad exemption will allow a Local Planning Policy (LPP) to more easily and effectively define circumstances where tree removal (or other tree-damaging activities) requires development approval. Without the general vegetation removal exemption in place, an adopted LPP can establish clear criteria for significant or regulated trees (e.g., based on size, species, age, ecological value, or location), directly triggering the need for assessment and approval where those criteria are met. This provides a more streamlined, transparent, and enforceable mechanism for tree protection across the scheme area, without the complicating factor of a broad exemption that could override or conflict with LPP based triggers.

Key existing protections in TPS No.4 that remain fully operative include:

- The use of development envelopes (Clause 4.7). The development envelopes prescribe an area authorised for building and clearing. Any building or clearing outside of the envelope requires Development Approval. Development envelopes apply to certain Special Residential, Special Rural, General Rural, Rural Living and Residential lots.

- A requirement for permission to clear remnant native vegetation in the Special Rural and Rural Living zones (Clause 4B.7).

- A requirement for permission to remove, lop, top, chop, ringbark or otherwise trim or destroy a certain size of tree within any of the City’s Strategic Regional Centre, District Centres and Local Centres (Clause 4C.9).

- Identification of areas as landscape and bushland protection areas on Special Control Area Map 1 which can serve to protect groups of trees (Clause 5.5). All development within the identified areas is required to obtain a Development Approval.

- Listing on the heritage list where those trees are of cultural heritage significance and worthy of conservation.

- Serving of a notice requiring landholders to preserve a tree or group of trees (Clause 80A of Schedule A- Tree Preservation Orders).

- Retention of trees and landscape features in public open space, drainage corridors and road reserves (eg. through the Structure Planning and subdivision process), which are determined by the WAPC in accordance with their Policies.

- Clause 4.2.4(c)(ii)(d) and 4.2.4(c)(iii)(c) were introduced into TPS No.4 via Scheme Amendment No.100 in June 2020. These clauses provide incentives and controls for split coded properties developing to the higher density code where trees with a trunk circumference greater than 0.6m are retained.

These mechanisms provide context specific controls for requiring approval or retention of vegetation and trees. Deletion of Clause 61(1)(r) removes a redundant general exemption that could otherwise undermine these targeted safeguards.

The City can further strengthen tree protection by adopting or amending a Local Planning Policy (LPP) defining criteria for significant trees (e.g., based on size, species, age, ecological value, or location), which would trigger development approval requirements where relevant. This approach aligns with WALGA's Model Local Planning Policy: Tree Retention (March 2024), which supports clarifying approval triggers for tree removal or damaging activities on private land through LPP’s.

Deletion also supports broader statewide urban forest and greening objectives, including:

- The Better Urban Forest Planning Guide (November 2018), jointly released by WALGA, the Western Australian Planning Commission, and the Department of Planning, Lands and Heritage, which promotes best practice planning for tree retention, replacement, and urban greening to address declining canopy cover.

- The Perth and Peel Urban Greening Strategy (released January 2026), a whole of government initiative led by the WAPC that sets a long-term direction for enhancing tree canopy, vegetation, and green spaces across public and private land, including through coordinated programs like the Let's Grow grants to boost community-led projects.

- The City's Urban Forest Strategy (2014), by enabling proactive measures to retain and grow urban canopy.

This proposal provides a more appropriate framework for tree protection without introducing complex qualifiers to the exemption. It reduces uncertainty for proponents while advancing urban greening goals and aligning more closely with the standardised Deemed Provisions.

ANALYSIS

Scheme Amendment Process

The proposed amendment is classified as a '**Standard Amendment**' under Regulation 34 of the *Planning and Development (Local Planning Schemes) Regulations 2015* (LPS Regulations). Standard amendments include rezoning proposals where the change relates to a zone or reserve consistent with the scheme's objectives, is aligned with an endorsed local planning strategy, would have minimal impact on unaffected land**,** or does not result in any significant environmental, social, economic or governance impacts on land in the scheme area (among other criteria listed in Regulation 34).

EPA Referral

Under section 48A of the *Environmental Protection Act 1986* and the *Environmental Protection Regulations 1987*, proposed amendments to local planning schemes must generally be referred to the Environmental Protection Authority (EPA) for a decision on whether environmental assessment is required.

Regulation 33C of the *Environmental Protection Regulations 1987* prescribes certain classes of amendments to local planning schemes that are exempt from mandatory referral to the EPA. These include specific basic amendments and other low-impact changes, such as minor text amendments to the scheme that do not involve a change in land use.

As the proposed amendment involves rezoning land, which does not fall within the prescribed classes under Regulation 33C, the amendment requires referral to the EPA prior to advertising.

OPTIONS

1. Council may initiate the Scheme Amendment as proposed or with modifications.
2. Council may decline to proceed with the Scheme Amendment.

CONCLUSION

This standard omnibus amendment comprises four primarily administrative proposals that correct mapping anomalies, remove outdated provisions, align the scheme with current MRS terminology, and delete Clause 61(1)(r) from Schedule A- Supplemental Provisions to the Deemed Provisions, thereby removing the broad exemption for vegetation removal.

Following the closure of the advertising period, the proposed amendment and any submissions received during the advertising period will be forwarded to Council for its consideration for final adoption.

RECOMMEND

That Council:

1. Pursuant to Part 5 of the *Planning and Development Act 2005*, initiate Amendment No. 130 to Town Planning Scheme No.4 as a standard scheme amendment to:

Proposal 1

a. Rezone Lot 2598 Millen Street, Mount Nasura from "Parks and Recreation (Local) Reservation" to "Residential R10/25" as identified on the Scheme Amendment Map (Proposal 1 - Map 1)

b. Rezone a portion of Lot 155 Sherwood Court, Armadale from "Parks and Recreation (Local) Reservation" to "Residential R40" as identified on the Scheme Amendment Map (Proposal 1 - Map 2)

c. Rezone portions of the following lots from "Unzoned" to "Residential" zone as identified on the Scheme Amendment Maps (Proposal 1 - Maps 3-10):

- **Lot 1104, Pomelo Way, Seville Grove;**
- **Lot 558 Felgate Court and Lot 555 Becket Court, Camillo;**
- **Lot 1187 Armanda Drive and Lot 555 O'Sullivan Drive, Camillo;**
- **Lots 1 and 2 Possum Place, Kelmscott;**
- **Lot 1678 Berala Court, Camillo;**
- **Lot 280 Drayton Court, Kelmscott;**
- **Lot 250 Carringal Place, Armadale;**
- **Lot 100, Clybucca Place and Lot 1719 Urana Road, Armadale.**

d. Rezone Lot 55 Shepherd Court, Harrisdale from "Unzoned" to "Urban Development" zone as identified on the Scheme Amendment Maps (Proposal 1 - Map 11)

Proposal 2

e. Remove portion of Additional Use No.35 hatching from all Residential zoned lots as identified on the Scheme Amendment Map (Proposal 2).

f. Reclassify Lot 8001 (Reserve 53732) Emporium Way, Piara Waters from "Residential R15/40" to "Parks and Recreation (Local)" as identified on the Scheme Amendment Map (Proposal 2).

g. Reclassify a portion of Lot 1101 Columbia Parkway, Piara Waters; from "Residential R15/40" to "Public Purpose - Public Utilities (PU) as identified on the Scheme Amendment Map (Proposal 2).

h. Modify the 'Description of Land' details for Additional Use No. 35 under Schedule 2 from "Part of Lot 114 Warton Road and part of Lot 3 Nicholson Road, Forrestdale" to "Lots 1, 1017, 1018, 1019 and 1020 Erade Drive, and portion of Lot 1102 Warton Road, Piara Waters".

Proposal 3

i. Modify the Scheme Maps and Legend relating to MRS reservations as follows:

- **Modify "Parks and Recreation (Region)" to "Regional Open Space".**
- **Modify the Public Purposes category "Technical School (TS)" to "Tertiary Education (TE)".**
- **Delete the Public Purposes categories "State Energy Commission (SEC)" and "Water Authority of WA (WSD)" and replace with "Public Utilities (PU)".**

Proposal 4

j. Delete Clause 61(1)(r) from 'Schedule A - Supplemental Provisions to the Deemed Provisions'.

2. Refer the above Amendment to Town Planning Scheme No.4 to the Environmental Protection Authority (EPA) pursuant to Section 81 of the *Planning and Development Act 2005.*

3. Refer the above Amendment to Town Planning Scheme No.4 to the Minister for Planning pursuant to Section 83A of the *Planning and Development Act 2005* for approval to advertise the Amendment.

4. Authorise the Mayor and the Chief Executive Officer to execute the Amendment documents, including in the instance that the Minister requires minor modifications to the Amendment prior to advertising.

5. Should the EPA advise that the Amendment does not require assessment, and the Minister for Planning grant approval to advertise the Amendment, conduct advertising for a period of 42 days in accordance with the requirements of the *Planning and Development (Local Planning Schemes) Regulations 2015*.

ATTACHMENTS

1. Proposal 1 - Map 1
2. Proposal 1 - Map 2
3. Proposal 1 - Map 3
4. Proposal 1 - Map 4
5. Proposal 1 - Map 5
6. Proposal 1 - Map 6
7. Proposal 1 - Map 7
8. Proposal 1 - Map 8
9. Proposal 1 - Map 9
10. Proposal 1 - Map 10
11. Proposal 1 - Map 11
12. Proposal 2

4.2 - MINISTER'S MODIFICATIONS - TOWN PLANNING SCHEME NO.4 AMENDMENT NO.128 - SHORT-TERM RENTAL ACCOMMODATION

WARD	:	ALL
FILE No.	:	M/66/26
DATE	:	11 FEBRUARY 2026
REF	:	AV/SN
RESPONSIBLE MANAGER	:	Executive Director Development Services

In Brief:

- Council at its meeting on 24 November 2025 adopted, without modification, Amendment No.128 to incorporate the deemed land uses of *Short Term Rental Accommodation – Hosted* and *Short Term Rental Accommodation – Unhosted* into Town Planning Scheme No.4, in response to amendment to the *Planning and Development (Local Planning Schemes) Regulations 2015*.
- The Hon Minister for Planning has directed the City to modify the Amendment pursuant to Section 87(2) of the *Planning and Development Act 2005*.
- The Minister has requested two modifications, one of which relates to land use permissibility of unhosted Short-Term Rental Accommodation in the TPS No.4 Residential zone.
- Recommend that Council adopt the modified Amendment in accordance with the Minister's modifications.

Tabled Items

Nil.

Decision Type

☒ **Legislative**	The decision relates to general local government legislative functions such as adopting/changing local laws, town planning schemes, rates exemptions, City policies and delegations etc.
☐ **Executive**	The decision relates to the direction setting and oversight role of Council.
☐ **Quasi-judicial**	The decision directly affects a person's rights or interests and requires Councillors at the time of making the decision to adhere to the principles of natural justice.

Officer Interest Declaration

Nil.

Strategic Implications

2.5.1 Ensure the City's planning framework is modern, flexible, responsive and aligned to achieving the outcomes of the Strategic Community Plan and Corporate Business Plan.

3.4.2 Encourage the development of new attractions, events, accommodation and activities for tourists.

Legal Implications

Planning and Development Act 2005
Planning and Development (Local Planning Schemes) Regulations 2015
Metropolitan Region Scheme
Town Planning Scheme (TPS) No.4

Council Policy/Local Law Implications

Local Planning Strategy

Budget/Financial Implications

Nil.

Consultation

The November 2025 report to Council includes the previous consultation for Amendment No.128.

BACKGROUND

Short-Term Rental Accommodation (STRA) refers to the practice of renting out a property (or part of a property) for a relatively short period of time, usually on a nightly or weekly basis. This type of accommodation is usually booked through online platforms such as Airbnb and is popular among travelers and visitors seeking temporary lodging for holidays, business trips or other short stays.

Town Planning Scheme No.4 (TPS No.4) Amendment No.128 was initiated by Council at its 26 May 2025 meeting and adopted at its 24 November 2025 meeting. The Amendment was then forwarded to the Western Australian Planning Commission (WAPC). The full background, including State Government planning reform measures applicable to STRA, is discussed in those reports.

Proposed Amendment No.128, as adopted by Council, is described as generally modifying TPS No.4 in the following manner:

1. Introducing unhosted and hosted STRA land uses into the TPS No.4 Zoning Table, with hosted STRA permitted ('P' use) in all zones except the Industrial Business and General Industry zones, and unhosted STRA permitted at the City's discretion ('D' use) in all zones except the Industrial Business and General Industry zones.

2. Deleting the land use definition of 'Bed and Breakfast' from the TPS No.4 Schedule 1 (2) Land Use Definitions and the Zoning Table.

DETAILS OF PROPOSAL

This report outlines the City's assessment of the modifications to Amendment No.128 and a recommendation to Council on subsequent progression of the Amendment. An extract of the modified Amendment text that the Minister requires Council to resubmit to the Minister for approval is attached.

Minister's Decision
The WAPC has now written to the City advising that the Hon Minister for Planning requires modifications to the Amendment in accordance with Clause 87(2) of the *Planning and Development Act 2005* (Act), as follows:

1. Delete the 'D' land use permissibility for unhosted short-term rental accommodation in the Residential zone and replace it with 'A'.

2. Delete and replace all references to 'hosted short term rental accommodation' and 'unhosted short term rental accommodation' with 'hosted short-term rental accommodation' and 'unhosted short-term rental accommodation'.

The table below summarises Council's adopted Amendment proposal, describes the Minister's required modifications and outlines the Minister's justification as provided by officers of the Department of Planning, Lands and Heritage (DPLH). City officer consideration of the modifications follows in the 'Comment' section of this report.

TPS No.4 Amendment 128 Adoption – November 2025 Council Meeting Resolution	Minister's Modification	Minister's Justification
1.a. Insert the land uses 'hosted short term rental accommodation' and 'unhosted short term rental accommodation' into the Zoning Table of Part 3 Zones and the Use of Land with the following levels of permissibility: *Table excerpt includes unhosted STRA in the Residential zone as a 'D' use*	1. Delete the 'D' land use permissibility for unhosted short-term rental accommodation in the Residential zone and replace it with 'A'.	The Minister has more recently sought that all amendments implementing STRA reforms identify unhosted short-term rental accommodation in the Residential zone as an 'A' use. The position has been formed in response to concerns being raised regarding potential amenity impacts of unhosted STRA in residential settings. While some earlier Local Government TPS amendments to implement the STRA reforms were approved to show unhosted STRA in the Residential zone as a 'D' use, modifications have been sought consistently across local planning schemes in the MRS area to show the use as 'A' where not already shown in an amendment.
	2. Delete and replace all references to 'hosted short term rental accommodation' and 'unhosted short term rental	*This modification was foreshadowed at earlier Amendment stages. As this is an administrative modification, no justification was sought.*

	accommodation' with 'hosted short-term rental accommodation' and 'unhosted short-term rental accommodation'.	

COMMENT

The first modification required by the Minister changes the replaces the land use permissibility of unhosted STRA in the TPS No.4 Residential zone from 'D' to 'A'.

A discretionary 'D' use is defined in TPS No.4 Clause 3.3.2, as follows:

> *"means that the use is not permitted unless the local government has exercised its discretion by granting development approval;"*

A discretionary 'A' use is defined in TPS No.4 Clause 3.3.2, as follows:

> *"means that the use is not permitted unless the local government has exercised its discretion by granting development approval after advertising the application in accordance with clause 64 of the deemed provisions;"*

The practical effect of the Minister's first modification is that unhosted STRA applications for development approval in the Residential zone must involve application advertising processes, and the assessment timeframe for the determination of these applications increases from 60 days to 90 days in accordance with the LPS Regulations.

The 'D' land use, as previously adopted by Council, still enabled the advertising of any unhosted STRA application for development approval that included matters requiring advertising (Schedule 2 Clause 64 of the LPS Regulations), as well as referral to State Government agencies and services providers (Schedule 2 Clause 66 of the LPS Regulations). However, the Minister's modification will require unhosted STRA applications in the Residential zone to be advertised for comment, without exception.

The second modification required by the Minister is considered administrative in nature.

ANALYSIS

Council has been directed by the Minister under Section 87(2)(b) of the *Act* to make modifications to Amendment No.128. This section states:

> *(2) The Minister may, in relation to a local planning scheme or amendment submitted to the Minister under subsection (1) —*
>
> > *(b) require the local government concerned to modify that local planning scheme or amendment in such manner as the Minister specifies before the local planning scheme or amendment is resubmitted for the Minister's approval under this subsection;*

There are no formal appeal rights if Council is aggrieved by the modifications required. Notwithstanding the lack of appeal rights, it is open for Council to consider political advocacy if

Council so determines. Should Council wish to make a submission to the Minister with respect to one or both of the modifications required, then that option is available.

City Officers note the Minister's advice that the first required modification is now being implemented consistently across local governments within the Metropolitan Region Scheme area. The City's officers have no objection to this modifiction.

In light of the above, City Officers recommend that the Amendment be returned with the modifications required. Council now needs to consider the required modifications, resolve to adopt the modified text in full or in part, and return the Amendment back to the WAPC and the Hon Minister for final approval.

OPTIONS

1. Council may note and endorse the modifications required by the Minister and authorise the Mayor and CEO to execute the modified Amendment documents prior to returning the documents for final approval and gazettal without making any further submissions to the Minister.

2. Council may lodge a submission seeking the Minister's reconsideration and explaining why Council is aggrieved by the changes required by the Minister and await the Minister's response prior to implementing modifications to Amendment No.128 and authorising the Mayor and CEO to execute the modified Amendment documents.

CONCLUSION

The Minister has directed that Amendment No.128 be modified prior to receiving final approval, with the most significant change being the change in land use permissibility for unhosted STRA in the Residential zone from a discretionary 'D' use to a discretionary 'A' use, thereby requiring advertising of the application.

In accordance with Option 1 above, it is recommended that Council resolve to endorse the modifications required by the Minister, authorise the Mayor and CEO to execute the modified Amendment documentation and return the documentation for final approval and gazettal, without making any further submissions to the Minister.

RECOMMEND

That Council:

1. **Notes the Hon Minister for Planning's direction pursuant to Section 87(2) of the *Planning and Development Act 2005* to require the implementation of modifications – in the attachment, to Amendment No.128 prior to the Amendment receiving final approval; and**

2. **Authorises the Mayor and CEO to execute the modified Scheme Amendment documents and return the documents for final approval and gazettal, without making any further submissions to the Minister.**

ATTACHMENTS

1. ⇩ Minister's Modification to TPS No.4 Amendment No.128 Final Adoption Council Resolution

5.1 - PIA PLANNING CONGRESS CANBERRA 20 - 22 MAY 2026

WARD	:	ALL
FILE No.	:	M/664/25
DATE	:	11 FEBRUARY 2026
REF	:	NM
RESPONSIBLE MANAGER	:	Executive Director Development Services

In Brief:

- The Planning Institute of Australia (PIA) Planning Congress 2026 will be held in Canberra, ACT, on the 20 – 22 May 2026.
- Matters to be covered should be of relevance to Armadale.
- Recommend that consideration be given to nominating a Councillor to attend.

Tabled Items

Nil.

Decision Type

☐ **Legislative**	The decision relates to general local government legislative functions such as adopting/changing local laws, town planning schemes, rates exemptions, City policies and delegations etc.
☒ **Executive**	The decision relates to the direction setting and oversight role of Council.
☐ **Quasi-judicial**	The decision directly affects a person's rights or interests and requires Councillors at the time of making the decision to adhere to the principles of natural justice.

Officer Interest Declaration

Nil.

Strategic Implications

Relates to the aim for good governance and leadership to:

4.1 Visionary Civic leadership and sound governance

4.1.3 Support the role of the elected body

4.1.3.3 Advocate and support Councillor engagement in outside bodies and events to maintain awareness and enhance the City's knowledge base.

Legal Implications

Nil.

Council Policy/Local Law Implications

Council Policy ADM3 – Conferences and Training

Council Policy EM1 – Reimbursement of Councillor's Expenses

Budget/Financial Implications

The PIA Planning Congress is on the City's approved Conference List for both Officers and Elected Members. Officer attendance will be funded from the Development Service's Conference and Meeting budget. Sufficient funds are available in the Councillor/ Member Development Budget should a Councillor be nominated to attend. The cost of the conference is estimated at $5,500 per delegate, including Conference registration of $2,595.00 per person.

BACKGROUND

The PIA is holding its 2026 Planning Congress at the National Convention Centre, Canberra, from the 20 – 22 May 2026. Study Tours will be held on Wednesday 20 May 2026. However, as the program is still being developed, this could be subject to change.

The PIA Planning Congress typically hosts a number of topics which are potentially applicable to the City and may provide valuable insight and information regarding a number of areas that impact the City.

Nominations for Councillor attendance are requested at this Development Services Committee Meeting, to be presented to the 23 February 2026 Council Meeting, in order to facilitate timely registrations.

DETAILS OF CONFERENCE

The 2026 PIA Congress will also celebrate the 75th anniversary of the Planning Institute of Australia. The conference will feature leading national and international experts and practitioners discussing how we, as a nation, respond to the challenges for the planning profession and the broader community in our major cities through to our regional centres. It will discuss technical development, policy development and personal development. For people and companies working in the built-environment sector – be it urban and regional planning, land development, urban design, transport planning, economic development, environmental sustainability and social planning.

Keynote speakers and the full program are yet to be announced. Planning Congress website is available.

CONCLUSION

An Officer may be attending the 2026 PIA Planning Congress. The matter is brought to the attention of Council to determine if it wishes to nominate a Councillor to attend.

RECOMMEND

That Council:

1. **Nominates Cr _____ to attend the PIA Planning Congress will be held at the National Convention Centre, Canberra ACT on the 20 to 22 May 2026;**
2. **Approves leave of absence for Cr _____ for attendance at the PIA Planning Congress from 20 to 22 May 2026.**

or

3. **If there is no nomination at the Development Services Committee or the Ordinary Meeting of Council on 23 February 2026, then the recommendation be as follows:**

That no nomination be made for an Elected Member to attend the PIA Planning Congress will be held at the National Convention Centre, Canberra ACT, on the 20 to 22 May 2026.

ATTACHMENTS

There are no attachments for this report.

COUNCILLORS' ITEMS

Nil

This refers to any brief updates from Councillors from their attendance at Working Group or Advisory Group meetings on which they represent Council.

EXECUTIVE DIRECTOR DEVELOPMENT SERVICES REPORT

Nil

MEETING DECLARED CLOSED AT _____

DEVELOPMENT SERVICES COMMITTEE

SUMMARY OF ATTACHMENTS

16 FEBRUARY 2026

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LOTS 818, 1092 & 1751 ALBANY HWY, KELMSCOTT

SOCIAL & AFFORDABLE HOUSING DEVELOPMENT APPLICATION

DEVELOPMENT APPLICATION DRAWING LIST

Sheet Number	Sheet Name	Current Revision
DA_001	DA DRAWING LIST / SCHEDULE OF ACCOMMODATION	A
DA_003	SITE PLAN	A
DA_004	LEVEL 00 - GROUND FLOOR PLAN	A
DA_005	LEVEL 01 - PLAN	A
DA_006	LEVEL 02 - PLAN	A
DA_007	LEVEL 03 - PLAN	A
DA_008	LEVEL 04 - PLAN	A
DA_009	LEVEL 05 - PLAN	A
DA_010	ROOF PLAN	A
DA_011	ELEVATION - NORTH	A
DA_012	ELEVATION - EAST	A
DA_013	ELEVATION - SOUTH	A
DA_014	ELEVATION - WEST	A
DA_015	SECTION A-A	A
DA_016	SECTION B-B	A
DA_017	APARTMENT TYPES	A
DA_018	OVERSHADOW STUDIES - WINTER	A

SCHEDULE OF ACCOMMODATION

LEVEL	1 BED - TYPE 1	2 BED - TYPE 1	2 BED - TYPE 2	TOTAL	PARKING	MOTORBIKE	CYCLES	STORES	CHP OFFICE
GROUND	0	0	0	0	39	4	52	0	1
01	7	6	0	13				13	
02	6	6	1	13				13	
03	6	6	1	13				13	
04	6	6	1	13				13	
05	6	6	1	13				13	
TOTAL	31	30	4	65	39	4	52	65	1
MIX	47.7 %	46.2 %	6.1 %	100 %					

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REFERENCE

NORTH

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REV	DESCRIPTION	DATE
A	ISSUED FOR DEVELOPMENT APPLICATION	15.12.25

CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

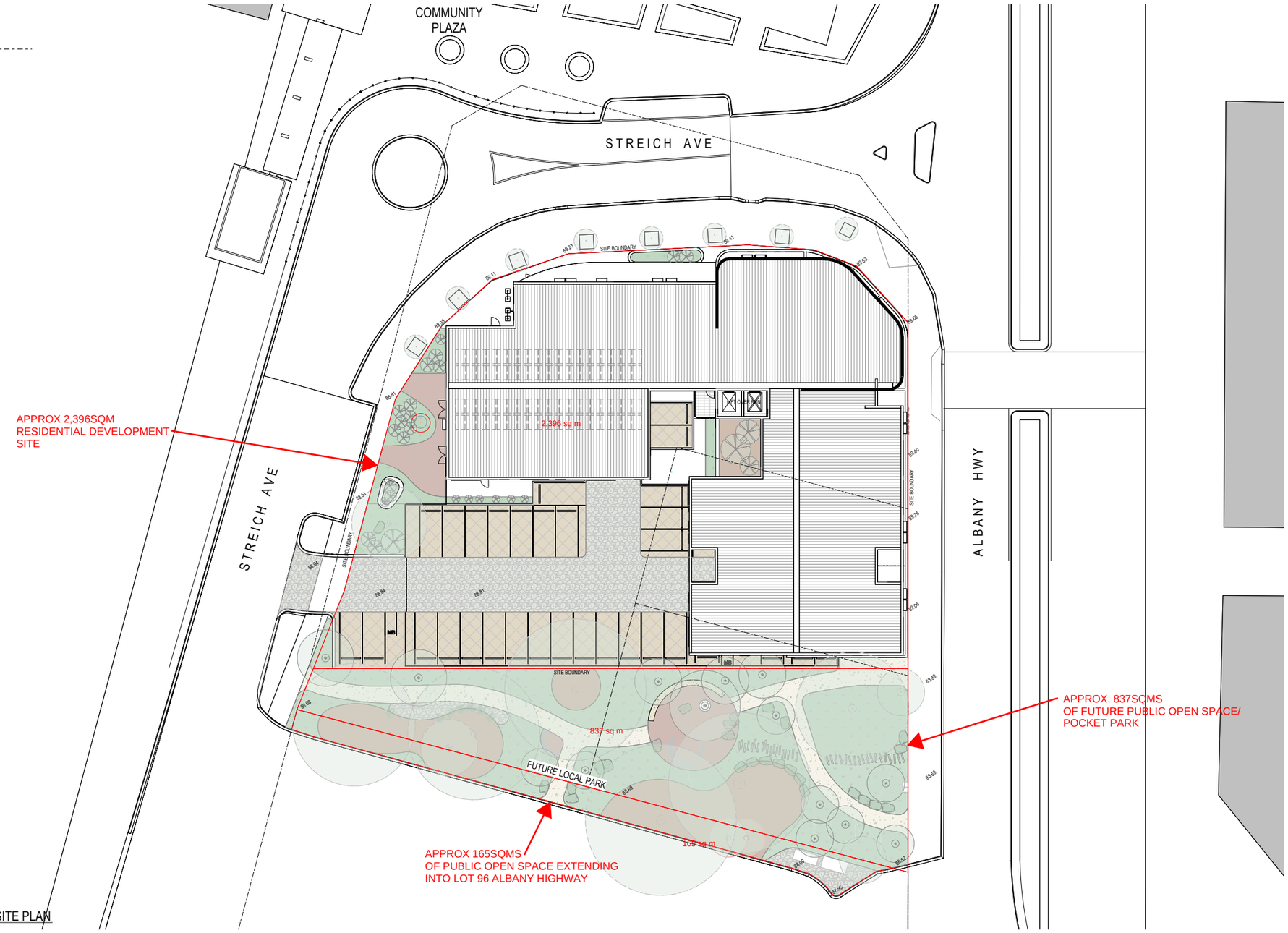
STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
DA DRAWING LIST / SCHEDULE OF ACCOMMODATION

REVIEWED JF
APPROVED BR
DRAWING NO. DA_001
SCALE @ A1 1 : 100
PROJECT NO. 018033
REV NO. A

FUTURE LOT BOUNDARIES

EXISTING LOT BOUNDARIES



1 DA SITE PLAN
1 : 200

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KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
SITE PLAN

REVIEWED
JF

APPROVED
BR

DRAWING NO.
DA_003

SCALE @ A1
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PROJECT NO.
018033

REV NO.
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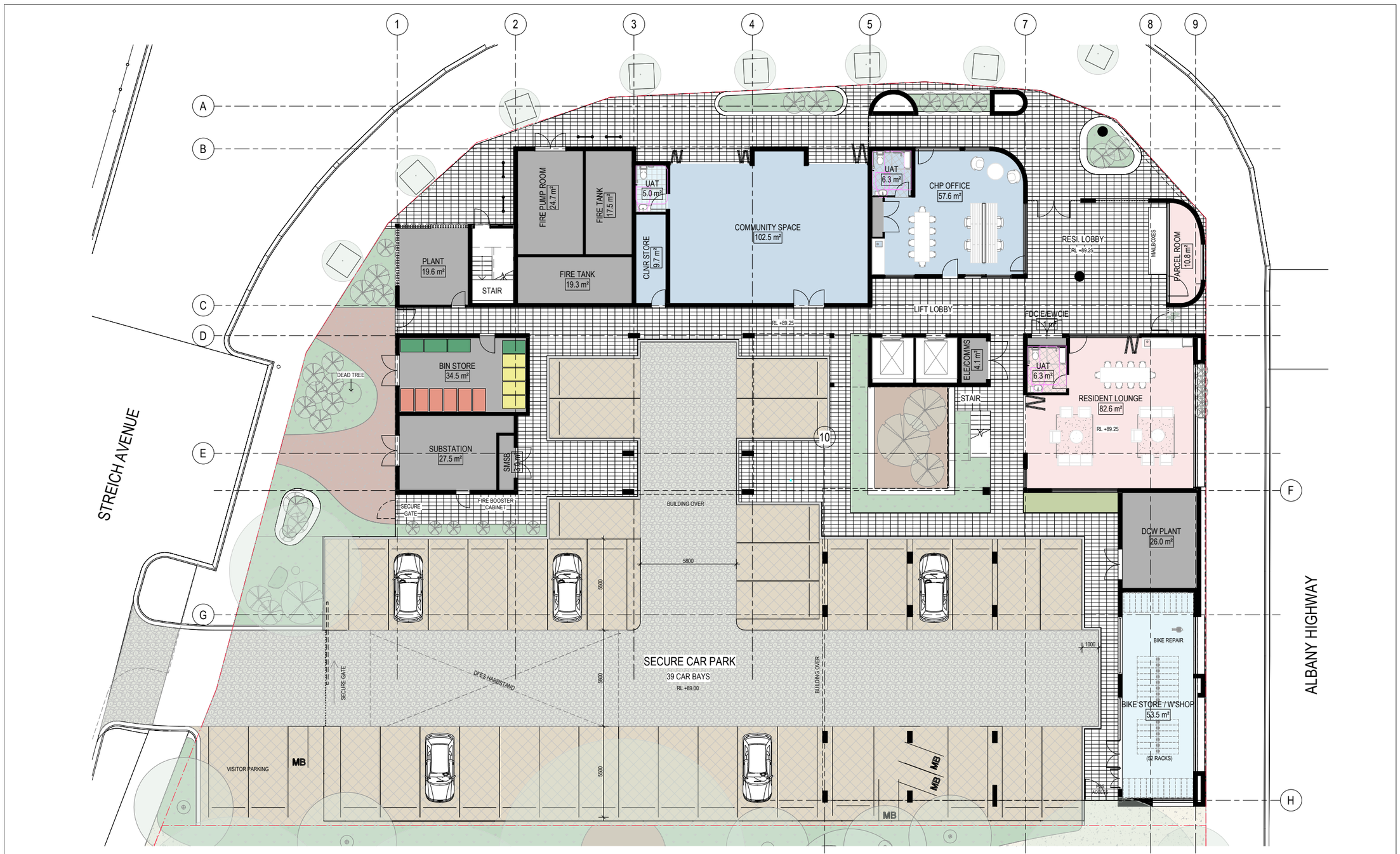

00 DA - LEVEL 00 - GROUND FLOOR PLAN
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DRAWING TITLE
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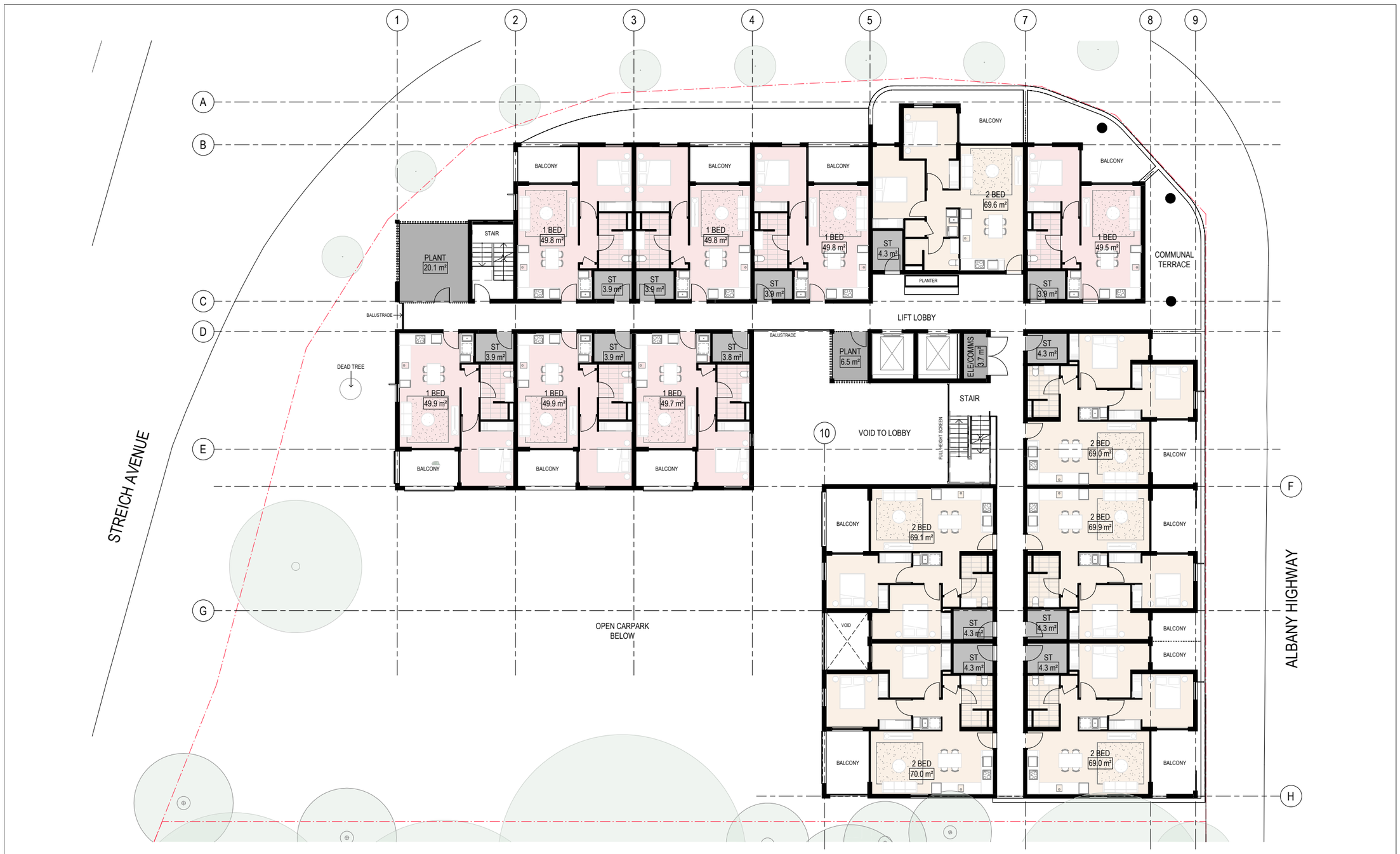

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DRAWING TITLE
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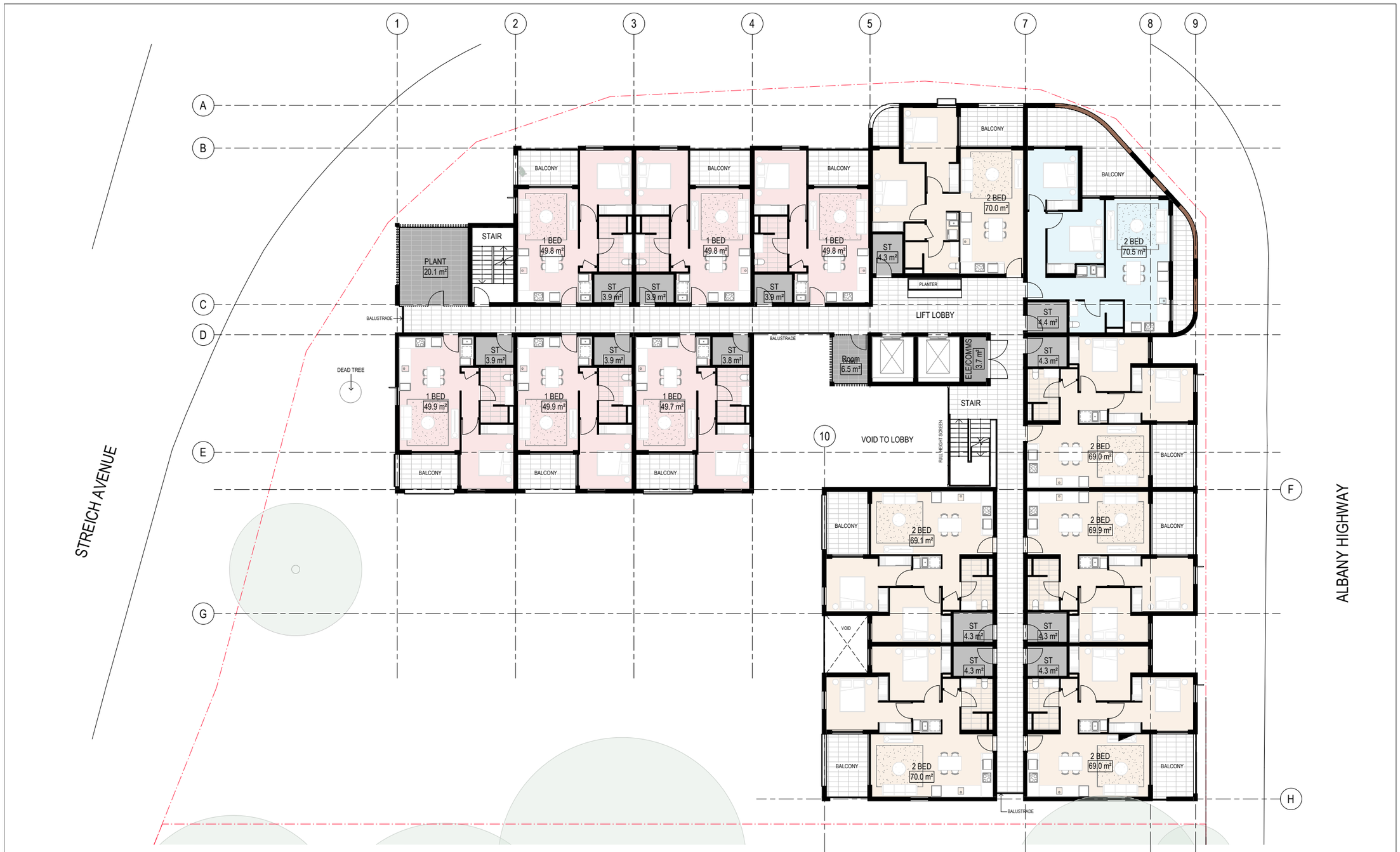

02 DA - LEVEL 02 PLAN
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STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
LEVEL 02 - PLAN

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JF

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BR

PROJECT NO.
018033

DRAWING NO.
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REV NO.
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03 DA - LEVEL 03 PLAN
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STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
LEVEL 03 - PLAN

REVIEWED JF
SCALE @ A1 1 : 100
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DRAWING NO. DA_007
REV NO. A

04 DA - LEVEL 04 PLAN
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DEVELOPMENT WA

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HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
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STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
LEVEL 04 - PLAN

REVIEWED JF
APPROVED BR
DRAWING NO. DA_008
SCALE @ A1 1 : 100
PROJECT NO. 018033
REV NO. A

05 DA - LEVEL 05 PLAN
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KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
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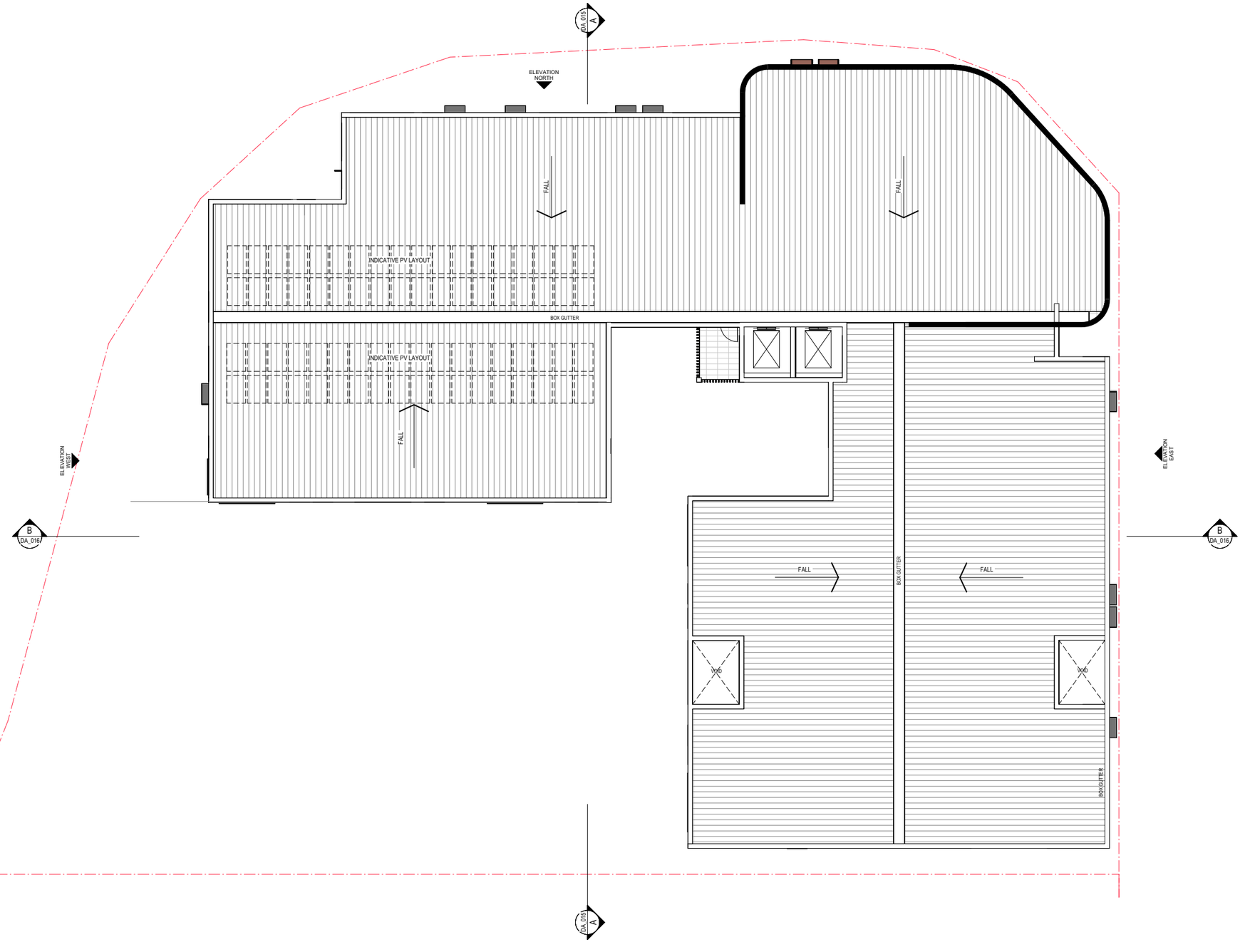

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DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
ROOF PLAN

REVIEWED
JF

APPROVED
BR

DRAWING NO.
DA_010

SCALE @ A1
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PROJECT NO.
018033

REV NO.
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1 ELEVATION NORTH
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REV	DESCRIPTION	DATE
A	ISSUED FOR DEVELOPMENT APPLICATION	15.12.25

CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
ELEVATION - NORTH

REVIEWED
JF

APPROVED
BR

DRAWING NO.
DA_011

SCALE @ A1
1 : 100

PROJECT NO.
018033

REV NO.
A

2 ELEVATION EAST
1 : 100

CONSULTANT

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242 Murray Street
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perth@hassellstudio.com

REFERENCE

NORTH

1:100
0m 1m 2m 3m 4m

NOTES

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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
ELEVATION - EAST

REVIEWED
JF

APPROVED
BR

DRAWING NO.
DA_012

SCALE @ A1
1 : 100

PROJECT NO.
018033

REV NO.
A

3 ELEVATION SOUTH
1 : 100

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NORTH

1:100
0m 1m 2m 3m 4m

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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
ELEVATION - SOUTH

REVIEWED
JF

APPROVED
BR

DRAWING NO.
DA_013

SCALE @ A1
1 : 100

PROJECT NO.
018033

REV NO.
A

4 ELEVATION WEST
1 : 100

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1:100
0m 1m 2m 3m 4m

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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
ELEVATION - WEST

REVIEWED
JF

SCALE @ A1
1 : 100

APPROVED
BR

PROJECT NO.
018033

DRAWING NO.
DA_014

REV NO.
A

A DA - SECTION A-A
1 : 100

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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
SECTION A-A

REVIEWED
JF

APPROVED
BR

DRAWING NO.
DA_015

SCALE @ A1
1 : 100

PROJECT NO.
018033

REV NO.
A

B DA - SECTION B-B
1 : 100

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perth@hassellstudio.com

REFERENCE

NORTH

1:100
0m 1m 2m 3m 4m

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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
SECTION B-B

REVIEWED
JF

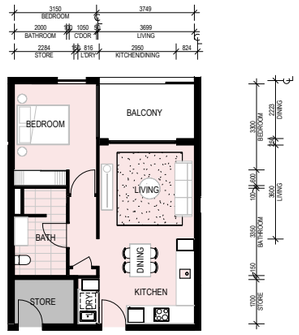
APPROVED
BR

DRAWING NO.
DA_016

SCALE @ A1
1 : 100

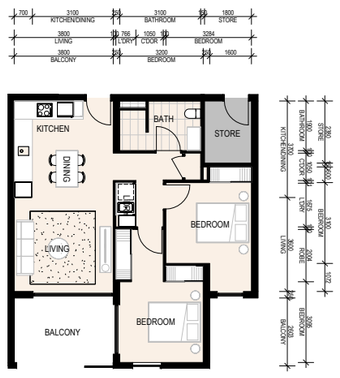
PROJECT NO.
018033

REV NO.
A



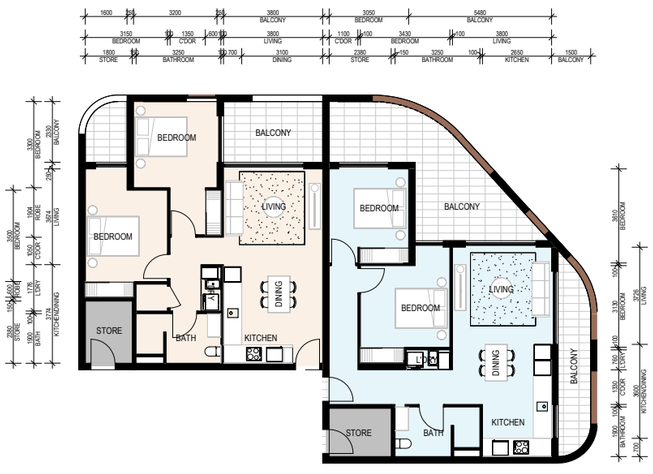
TYPE 1

BEDS	1
BATHS	1
INTERNAL AREA	49.8sqm
LIVEABLE HOMES LEVEL	SILVER



TYPE 2A

BEDS	2
BATHS	1
INTERNAL AREA	69.0sqm
LIVEABLE HOMES LEVEL	SILVER



TYPE 2B

BEDS	2
BATHS	1
INTERNAL AREA	70.0sqm
LIVEABLE HOMES LEVEL	SILVER

TYPE 2C

BEDS	2
BATHS	1
INTERNAL AREA	72.2sqm
LIVEABLE HOMES LEVEL	SILVER

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REFERENCE

NORTH

1:100
0m 1m 2m 3m 4m

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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
APARTMENT TYPES

REVIEWED
JF

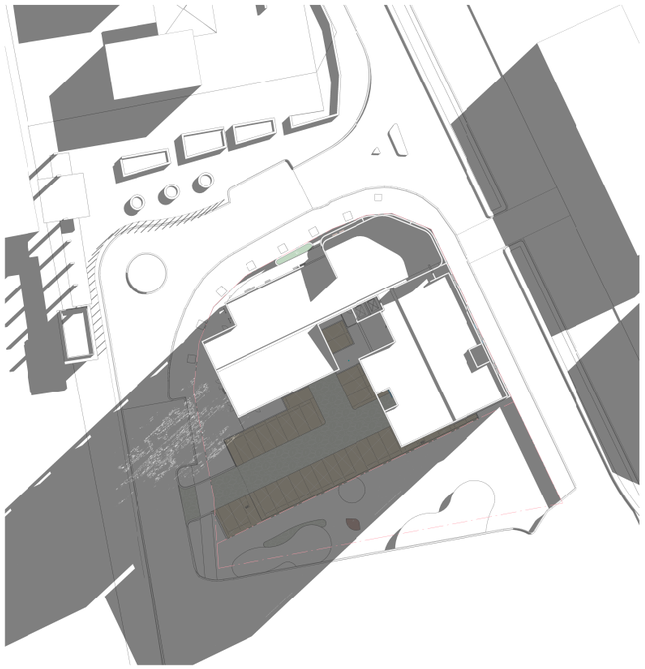
APPROVED
BR

DRAWING NO.
DA_017

SCALE @ A1
1 : 100

PROJECT NO.
018033

REV NO.
A



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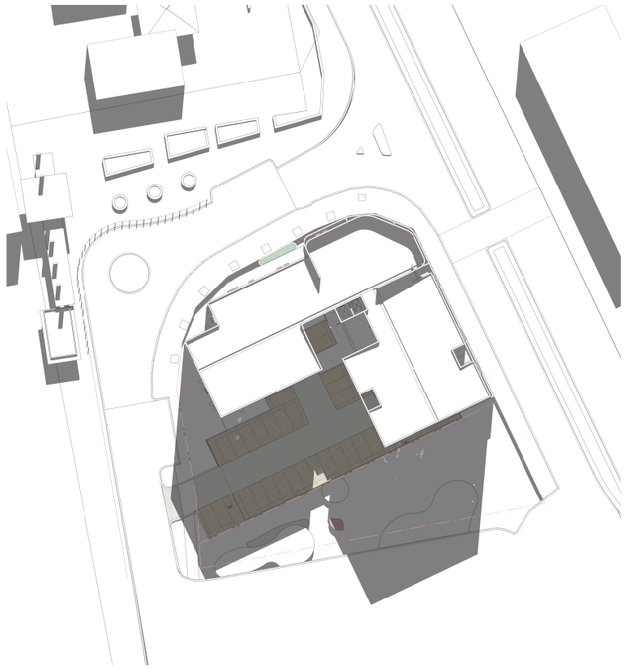

DA_WINTER SOLSTICE 12PM

DA_WINTER SOLSTICE 3PM

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REFERENCE

NORTH

1:500
0m 5m 10m 15m 20m

NOTES

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REV	DESCRIPTION	DATE
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CLIENT
DEVELOPMENT WA

PROJECT
HAFF SOCIAL AFFORDABLE HOUSING
LOTS 818, 1092 & 1751 ALBANY HWY
KELMSCOTT

STATUS
DEVELOPMENT APPLICATION

DRAWING TITLE
OVERSHADOW STUDIES - WINTER

REVIEWED
JF

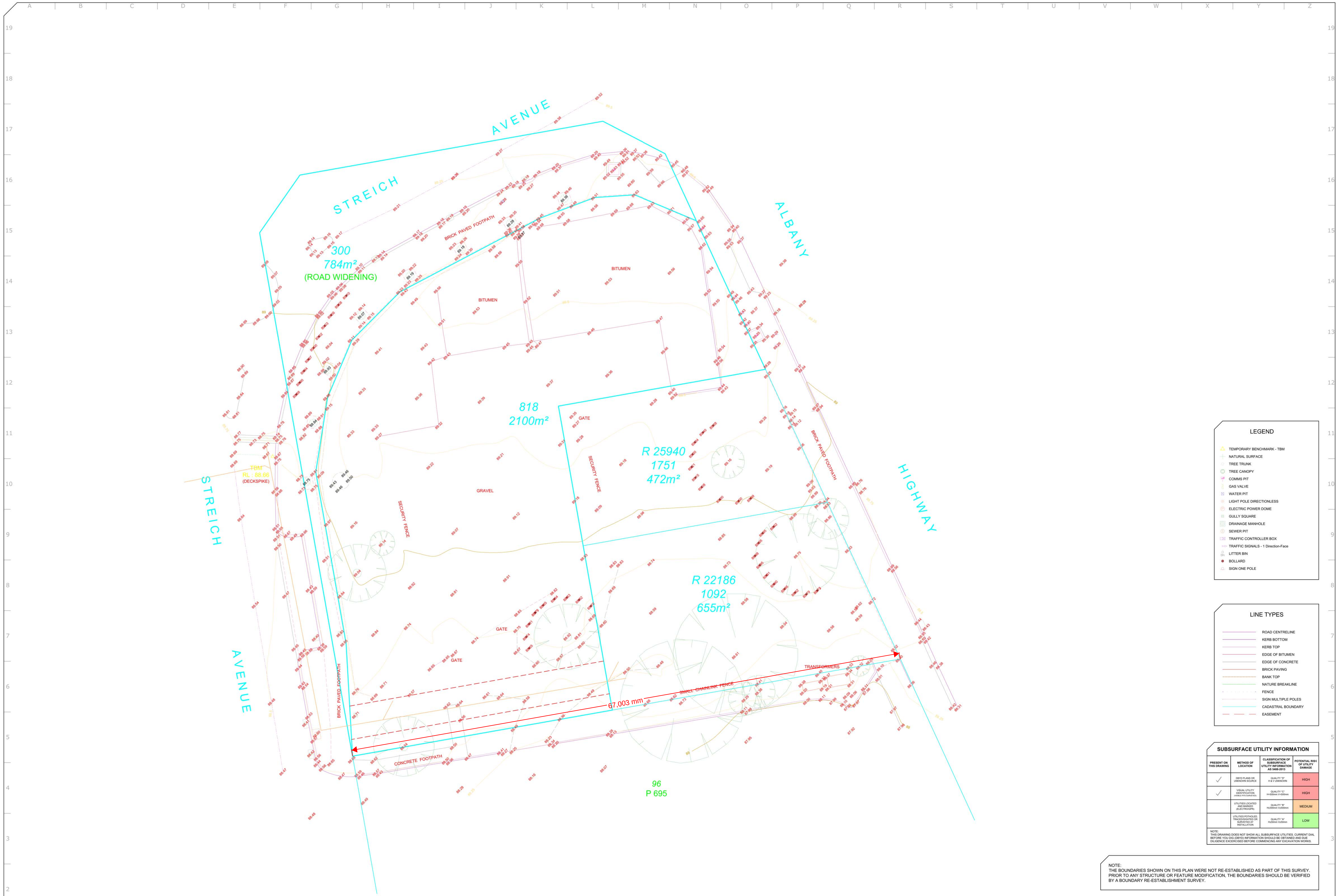
APPROVED
BR

DRAWING NO.
DA_018

SCALE @ A1
1 : 500

PROJECT NO.
018033

REV NO.
A



RM SURVEYS LICENSED SURVEYORS

PHONE: 08 9457 7900 EMAIL: INFO@RMSURVEYS.COM.AU WEBSITE: RMSURVEYS.COM.AU

SCALE 1:200
ALL DISTANCES IN METRES
PAPER SIZE A1

SURVEYOR	VERTICAL DATUM
DP	LOCAL
SURVEY DATE	HORIZONTAL DATUM
20/06/2024	PCG94

CLIENT:
DEPARTMENT OF PLANNING, LANDS & HERITAGE

REV	DESCRIPTION	DRN	CKD	APP	DATE
0	INITIAL ISSUE	AC	DP	BB	25/06/2024

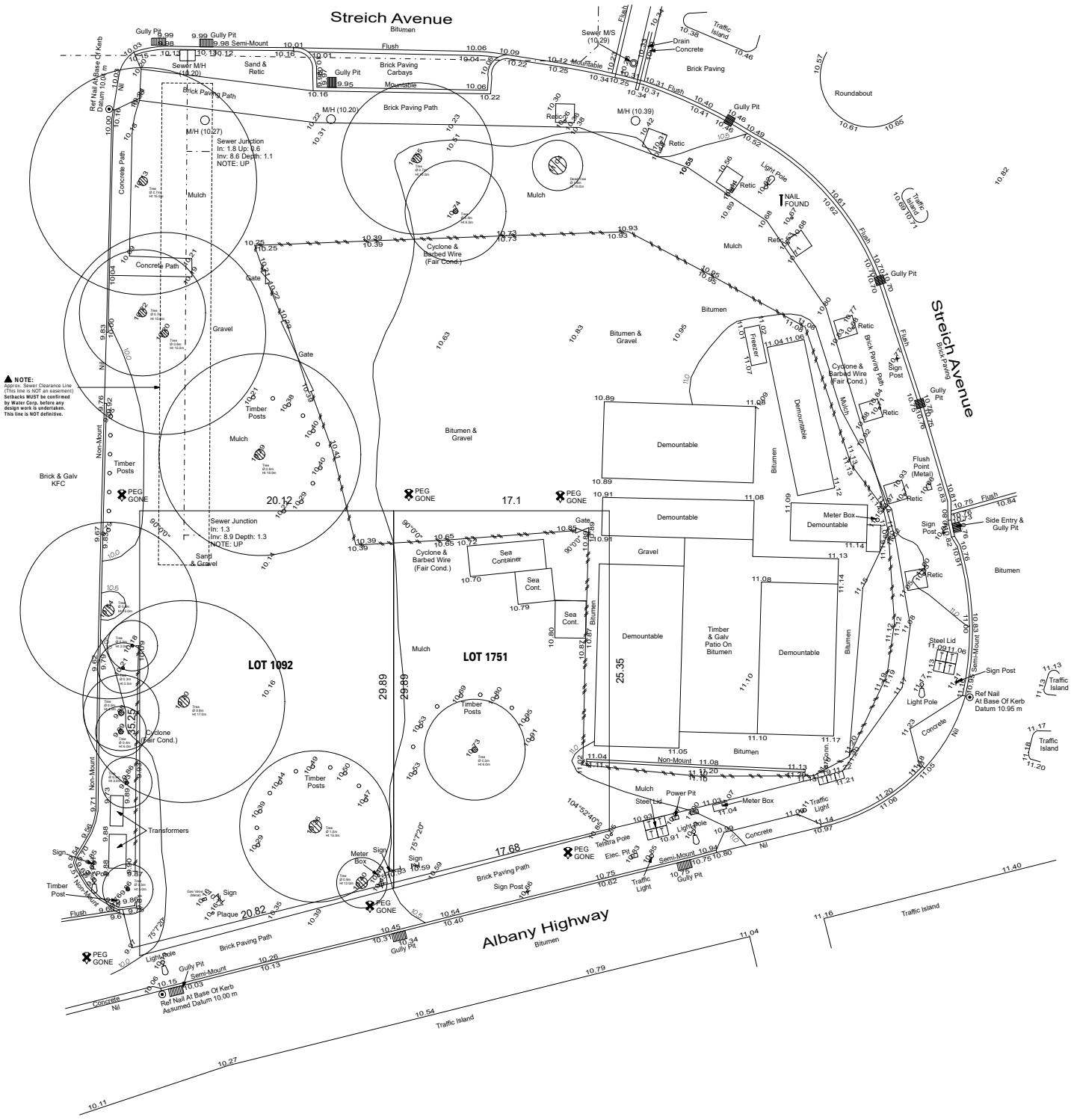
FEATURE AND CONTOUR SURVEY
LOTS 818 on DP424410, 1751 on DP 167665 & 1092 on DP 160873
2805 ALBANY HIGHWAY, KELMSCOTT

JOB No.	DRAWING No.	REV
PTA-STRE	PTA-STRE-DW-001	0

▲ **NOTE:**
CHECK SHIRE RE: AMALGAMATION BEWARE COULD DELAY BUILDING LICENSE (AMALGAMATION PROCESS APPROX. 6-9 MONTHS)

LEGEND	
	Power Dome
	Power Pole
PH	Phone Pits
WC	Water Conn.
TP 10.00	Top Pillar/Post
TW 10.00	Top Wall
TR 10.00	Top Retaining
TF 10.00	Top Fence

▲NOTE:
Due to lack of survey marks/pegs, exact location of all features/levels/structures are approximate only and are to be verified when repegged.



▲NOTE:
Approx. Sewer Clearance Line (This line is NOT an easement)
Setbacks MUST be confirmed by Water Corp. before any design work is undertaken. This line is NOT definitive.

LOT 1751 MISCLOSE
0.013 m

LOT 1091 MISCLOSE
0.013 m

LOT 1092 MISCLOSE
0.014 m

▲DISCLAIMER:
Lot boundaries drawn on survey are based on landgate plan only. Survey does not include title search and as such may not show easements or other interests not shown on plan. Title should be checked to verify all lot details and for any easements or other interests which may affect building on the property.

▲DISCLAIMER:
Survey does not include verification of cadastral boundaries. All features and levels shown are based on orientation to existing pegs and fences only which may not be on correct cadastral alignment. Any designs based or dependent on the location of existing features should have those features' location verified in relation to the true boundary.

▲DISCLAIMER:
Survey shows visible features only and will not show locations of underground pipes or conduits for internal or mains services. Verification of the location of all internal and mains services should be confirmed prior to finalisation of any design work.

▲DISCLAIMER:
Cottage & Engineering surveys accept no responsibility for any physical on site changes to the parcel or portion of the parcel of land shown on this survey including any adjoining neighbours levels and features that have occurred after the date on this survey. All Sewer details plotted from information supplied by Water Corporation.

Title Table		
Lot	Volume	Folio
1751	3150	706
1092	3150	197

Scale 1:200
0 2 4 6 8

COTTAGE SURVEYS
LICENSED SURVEYORS

87-89 Guthrie Street
Osborne Park, WA 6017

PO Box 1611
Osborne Park
Business Centre WA 6917

P: (08) 9446 7361
E: perth@cottage.com.au
W: www.cottage.com.au

JOB #	522610	**GPS**	Lat: -32.114087 Long: 116.014285	**ROADS**	Bitumen	**ELEC.**	U/Ground
CLIENT	Department of Planning, Lands and Heritage	**ORDER #**	RQ107826	**KERBS**	See Survey	**COMMS.**	Yes
ADDRESS	Albany Highway	**LOT**	Lot 1751, 1092 (DP 167665 , 160873)	**FOOTPATH**	Brick	**WATER**	Yes
SUBURB	Kelmscott			**SOIL**	Sand	**GAS**	Check Alinta
LGA	CITY OF ARMADALE	**AREA**	472, 655m² **VOL.** See Table **FOL.** See Table	**DRAINAGE**	Good	**SEWER**	Yes
DRAWN	T.Currey	**DATE**	16 May 22 **SSA** No	**VEGETATION**	Light Grass Cover	**COASTAL**	No (Approximate Only Confirm With Shire)

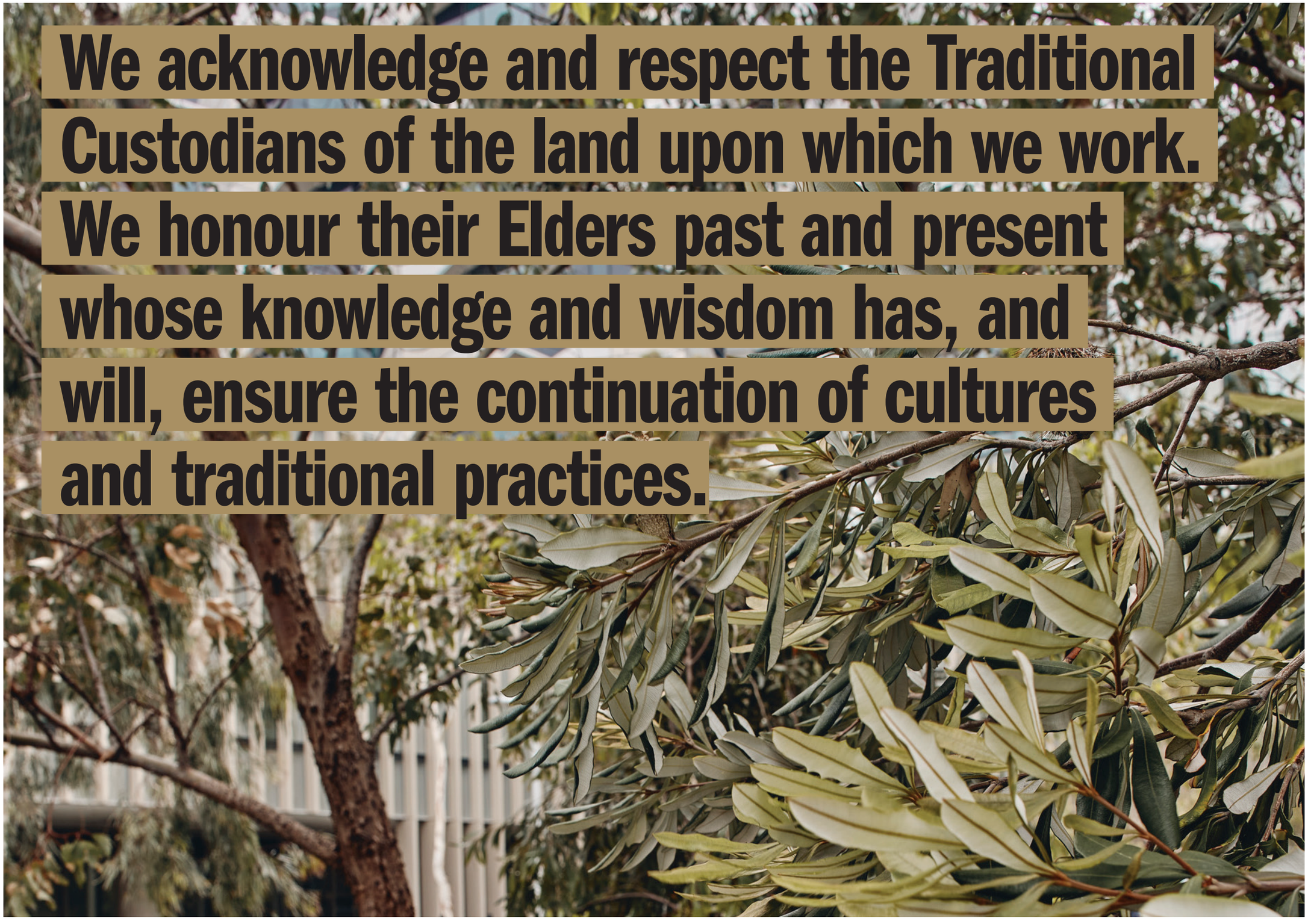
Hassell

HAFF KELMSCOTT
SOCIAL & AFFORDABLE HOUSING
DEVELOPMENT APPLICATION DESIGN REPORT

Social & Affordable Housing - HAFF Kelmscott
018033

Prepared for
Development WA

December 2025


We acknowledge and respect the Traditional
Custodians of the land upon which we work.
We honour their Elders past and present
whose knowledge and wisdom has, and
will, ensure the continuation of cultures
and traditional practices.

Hassell (Perth)
Whadjuk Country
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1. Introduction 4
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Context & Character 9
Landscape Quality 14
Built Form & Scale 27
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Sustainability 43
Amenity 48
Legibility 50
Safety 53
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Aesthetics 59
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INTRODUCTION

Introduction

EXECUTIVE SUMMARY

This Design Report has been prepared by Hassell to supplement the Development Application for a new build-to-rent (BTR) residential development located at Lots 818, 1092 and 1751 Albany Highway Kelmscott.

The proposed development is a BTR for social and affordable housing to be delivered by Development WA and operated by a Community Housing Provider. The proposed development emphasises cost efficiency through structural and architectural design choices, repeatable dwelling layouts and low maintenance building materials landscaping.

The vision is to create a vibrant, inclusive community that takes advantage of its location within the Kelmscott Town Centre next to Kelmscott Station, and adjacency to the new Kelmscott Station Plaza which was revitalised as part of the Metronet Denny Avenue Level Crossing Removal project.

This high quality scheme consists of a 6-storey residential apartment building incorporating 65 apartments, with a mix of well proportioned 1 bedroom and 2 bedroom dwellings throughout. The proposed development includes a highly activated ground floor plane, that includes the residential lobby and landscaped courtyard, a Community Housing Provider office, community space, resident lounge, bike store and workshop with up to 60 racks, 39 car parking bays and 5 motor bike parking bays. Vehicular access to the development is via Streich Avenue with main pedestrian entrance from the Station Plaza.

The vision encompasses the delivery of affordable and diverse housing, with 23% social and 77% affordable apartment development that will establish a sustainable and replicable BTR model for suburban transport oriented design and apartment living.

Introduction

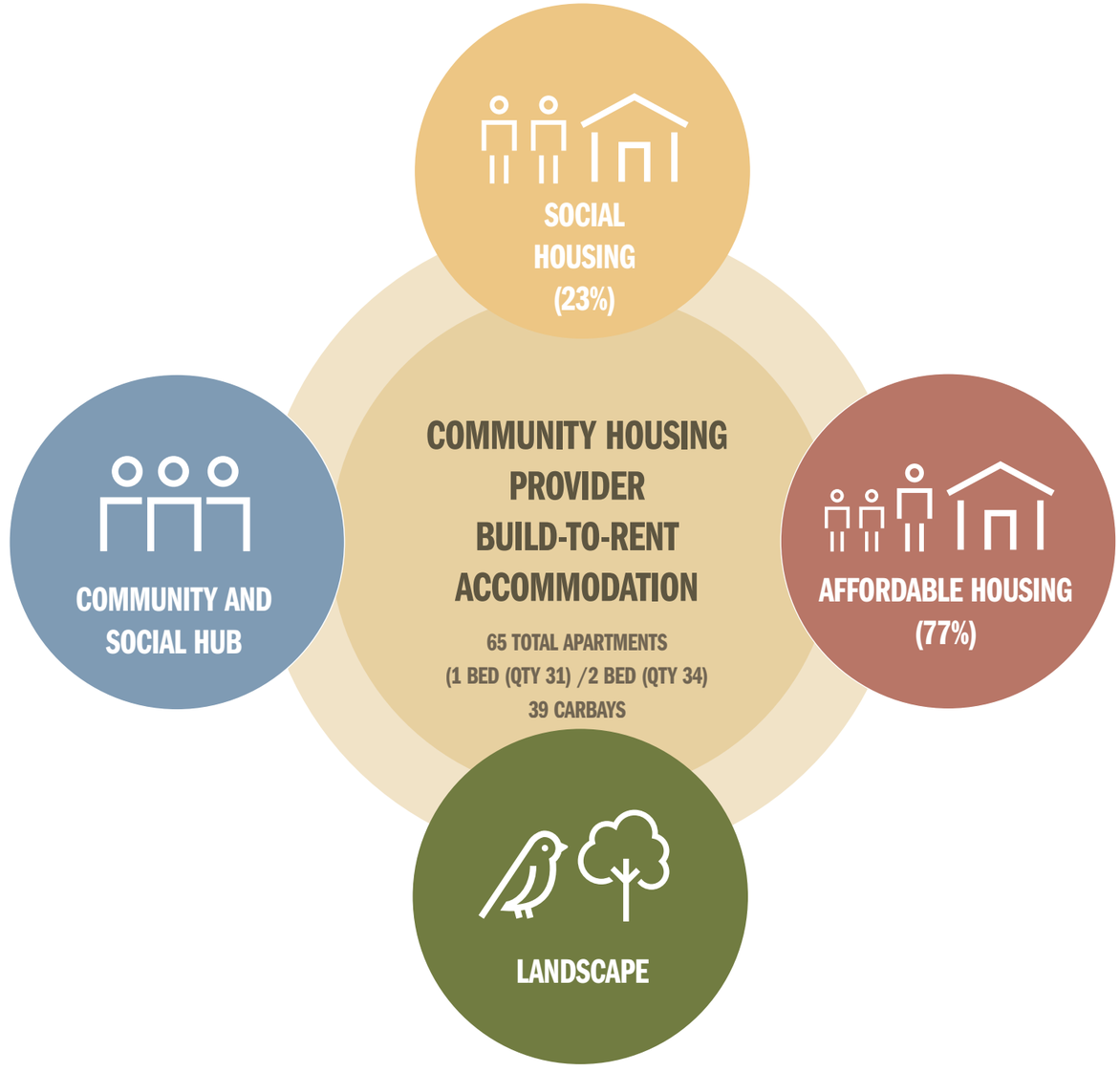
PROJECT BRIEF

The proposal for Kelmscott forms part of Development WA's HAFF Round One Builder ECI projects.

The goal of the programme is to deliver social and affordable housing in a number of priority locations across Perth Metro area in an expedient, efficient, cost-effective and high-quality manner, to provide much needed housing to a diverse range of West Australians.

The project vision is to create an inclusive and vibrant community in the heart of Kelmscott that serves as a catalyst for the further revitalisation of the town centre.

It is intended that the social and affordable BTR housing will be owned and operated by a Community Housing Provider once complete.



Introduction

DESIGN PRINCIPLES

SPP 7.0 - DESIGN OF THE BUILT ENVIRONMENT

1. CONTEXT & CHARACTER

The proposal acknowledges the wider urban context of Kelmscott through the siting of the built form to directly address the corner of Albany Highway and the station plaza, with articulation of the built form providing an architectural gesture to accentuate the landmark corner.

The built mass is broken into 3 distinct elements to reduce the perceived bulk and scale of the development whilst providing opportunity for variation in materiality and colour across the building facade.

2. LANDSCAPE QUALITY

The development has been sited to retain the significant mature trees to the south of the site. The introduction of a pocket park public open space will provide additional tree canopy cover and community amenity.

Verge planting and street trees are to be retained and provided at ground level, and a central atrium contains extensive planting to improve resident amenity.

Low maintenance and drought resistant native planting has been proposed throughout to minimise water usage and maintenance requirements.

3. BUILT FORM & SCALE

The proposal forms a landmark building befitting the key corner location in the station precinct and addressing view corridors down Albany Highway.

The massing and scale of the building is appropriate to its context within the town centre and station precinct, with breaks in the building massing mitigating the perceived bulk and scale of the built form.

4. FUNCTIONALITY & BUILD QUALITY

The design contains simple, well resolved and functional apartment layouts that will meet the needs of a diverse range of residents and simplify construction through a kit-of-parts approach.

High quality and robust materials have been selected, allowing for ease of maintenance by Community Housing operator and is in-keeping with the ethos of efficiency in construction.

5. SUSTAINABILITY

The proposal prioritizes occupant health and wellbeing. A climate responsive design has been tailored to local climatic conditions, prioritizing thermal comfort, natural ventilation and effective shading strategies.

Social value is promoted through resident-focused spaces that allow communal and community connection and promote social sustainability within the residents.

6. AMENITY

The design provides a hierarchy of outdoor spaces to provide amenity to all building occupants. Active street frontages and community spaces, central landscaped atrium, internal and external communal areas and balconies all support community interaction and personal recreation (in response to CPTED research).

Residential corridors and lobby areas have an abundance of natural light and fresh air, with the pocket park to the sites south retaining significant tree canopy and providing residents and the community with additional amenity

7. LEGIBILITY

The proposal has been designed to provide clear wayfinding through a clear spatial hierarchy with intuitive navigation and sightlines. Building entries are clearly marked with signage and lighting, with the architectural expression of the ground floor providing additional legibility to the station plaza areas. Landscape and communal areas create a strong sense of connection to the surrounding areas.

Staircases are envisioned as visual markers along key sightlines, and utilize natural light to encourage their use for movement throughout the development.

8. SAFETY

Clear surveillance (in response to CPTED research) of the street and public realm is provided by the residential lobby and adjacent Community Housing Provider office, which has a visual connection to the station plaza and internal lobby and carpark. Communal and community facilities along with an open bike store provide active frontages to 80% of the station plaza and Albany Highway elevations.

Open corridors and central staircase provide passive surveillance within the development, along with balconies and openings addressing all elevations. Permeable fencing is provided to the carparking area to allow for surveillance of the POS.

9. COMMUNITY

A residents lounge and multi-purpose community space are provided at ground floor to create opportunity for social interaction between residents, visitors and the wider community. A small communal terrace is provided on Level 1 to allow further spaces for communal interaction.

The central open corridor and stair provides intends to foster a sense of community amongst residents.

The active street frontages and landscaped public open space provide benefit for the broader community.

10. AESTHETICS

The architectural response draws inspiration from the surrounding context, comprising a robust and tactile material palette that refers to the colours and forms of the Darling Scarp.

The architectural form create a landmark building of a scale appropriate to its key corner location within the Kelmscott town centre.

PROJECT VISION

A PLACE TO CALL HOME

Creation of a vibrant and inclusive community that provides housing options for a diverse range of residents. A place that people are proud to call home.

A CONNECTED COMMUNITY

A high performing building envelope provides a comfortable environment that reduces power costs for residents. Connection to rail and bicycle networks encourages alternative modes of transport.

A NEW LANDMARK

Provide a high quality landmark building that activates the Station Precinct and serves as a catalyst for further revitalisation of Kelmscott Town Centre

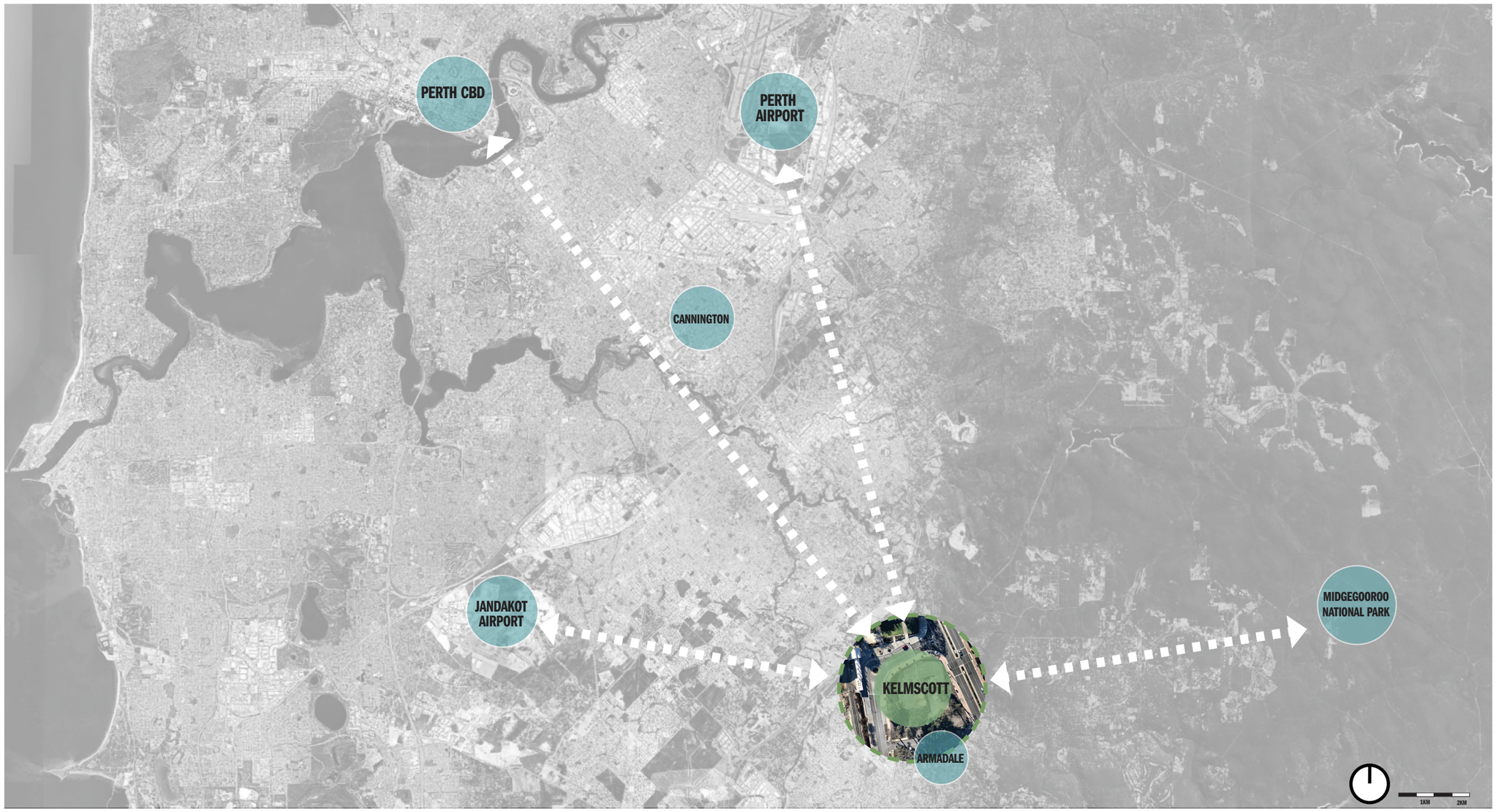
BUILDING EFFICIENCY

An efficient plan and structure that minimises use of materials and embodied carbon, and optimises affordability.

CONTEXT + CHARACTER

Context & Character

LOCATION PLAN



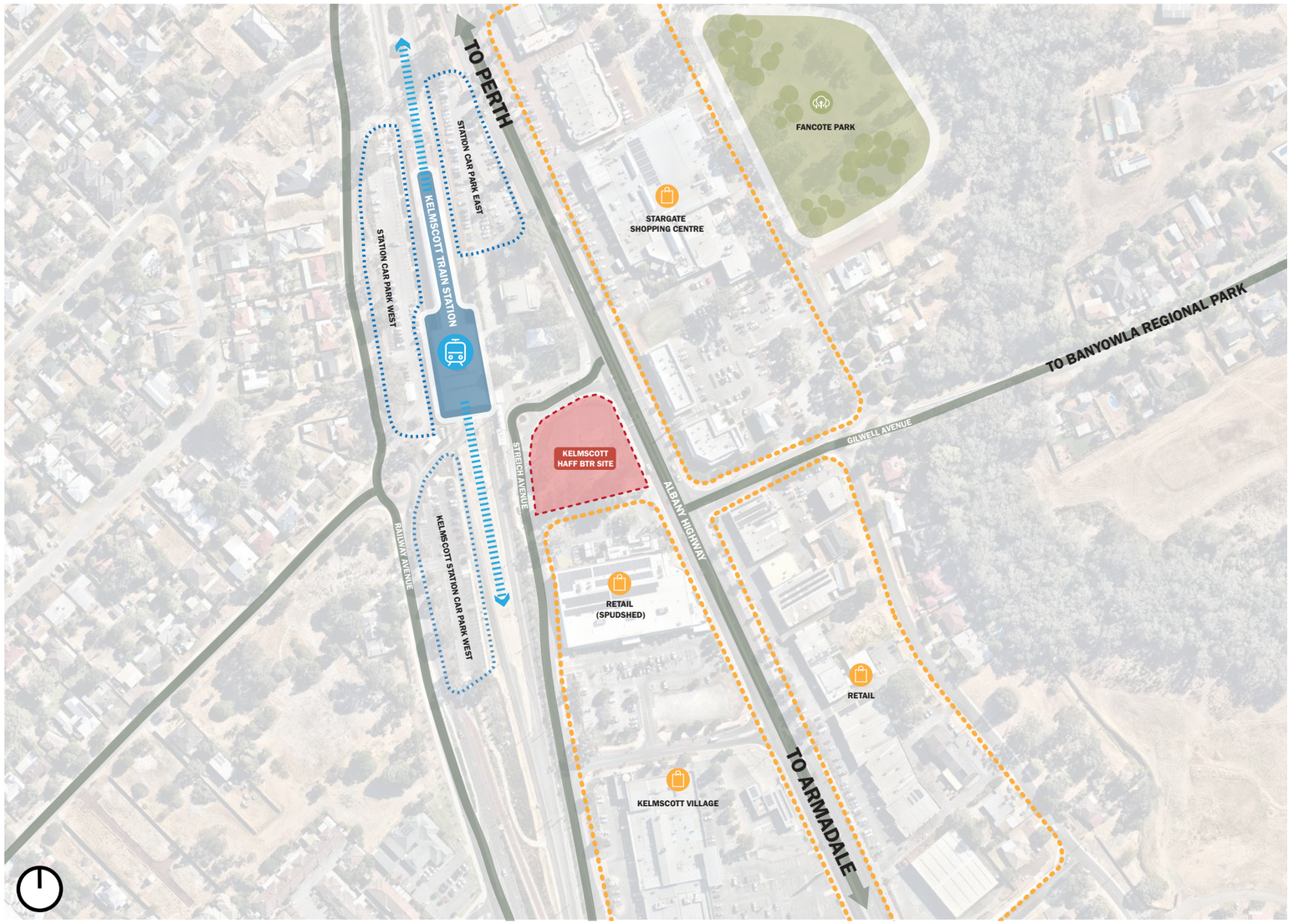
URBAN CHARACTER

The project is situated within the Kelmscott Town Centre and immediately adjacent to Kelmscott train station. Directly bounded by the newly upgraded Armadale line to the west and Albany Highway to the east, the site presents an ideal opportunity for transit oriented infill housing development within the area.

Kelmscott is located on Whadjuk Noongar country and the area is know as Goolamrup in Noongar with cultural ties to the Djarlgarro Beelier (Canning River). The area was one of the first four townsites established in the Swan River Colony.

The area is bisected by the river, with largely suburban housing to the west on the coastal plane with commercial and light industrial uses sleeving Albany Highway. A more semi-rural character is found to the east as the suburb rises up the Darling Scarp with extensive natural reserves and bushland easily accessible from the area.

In general the area is challenged by an aging suburban housing stock and need to accommodate a higher number of more diverse dwelling typologies as the area transitions towards a more urban character.



KELMSCOTT CHARACTER

EXISTING









SITE VIEWS

EXISTING

LANDSCAPE QUALITY

DESIGN OPPORTUNITIES

SHARED RESIDENT + COMMUNITY AMENITY

In line with SPP7.3, section 3.4 Communal Open Space, communal areas should encourage residents and their community to gather in safe and comfortable places, which allow them to relax and socialise. Thoughtful placement of simple benches and low walls, nestled in the shade of the existing Marri, Eucalyptus, Melaleuca & Ficus trees invites conversation and a quiet place for reflection beyond resident's private living spaces.

The existing trees are a central feature of the site and seating will naturally become an inviting focal point for residents and visitors to gather, share time together, and enjoy. This approach aims to preserve the character of the site through tree retention and and strengthens social connections within the community.

GATHERING

QUIET + RETREAT

CONTEMPLATION

LANDSCAPE QUALITY

AMENITY

COMMUNITY

→ The landscape proposal, which incorporates substantial tree canopy coverage, high-quality and well-designed community and garden spaces, open lawn areas and varied seating, aligns with built environment design objectives by making landscape central to the scheme to create an attractive outlook for all residents.

→ The landscape proposal maximises local everyday amenity by delivering inviting, universally accessible spaces—including open lawns, community gardens and shaded seating areas—that encourage group gatherings and community events, ensuring everyone can enjoy comfortable, functional and attractive outdoor environments. By thoughtfully connecting with and enhancing the existing assets of Ellen Stirling Gardens, the design encourages regular use by residents and visitors alike, supporting a vibrant, sociable and healthy community setting throughout the day and week.

→ The proposal seeks to make a meaningful place for residents and their visitors to explore, enjoy and use as their own backyard. The landscape proposal offers a diverse range of activating and functional spaces, such as community gardens, open lawns and shaded seating, catering to residents and visitors of all ages and abilities, thereby encouraging social interaction, inclusivity and physical activity. By providing adaptable outdoor environments that can accommodate different uses and changing community needs, the proposal supports ongoing social engagement and ensures the landscape remains relevant and welcoming as local demographics evolve.

Landscape Quality

LANDSCAPE DESIGN VISION

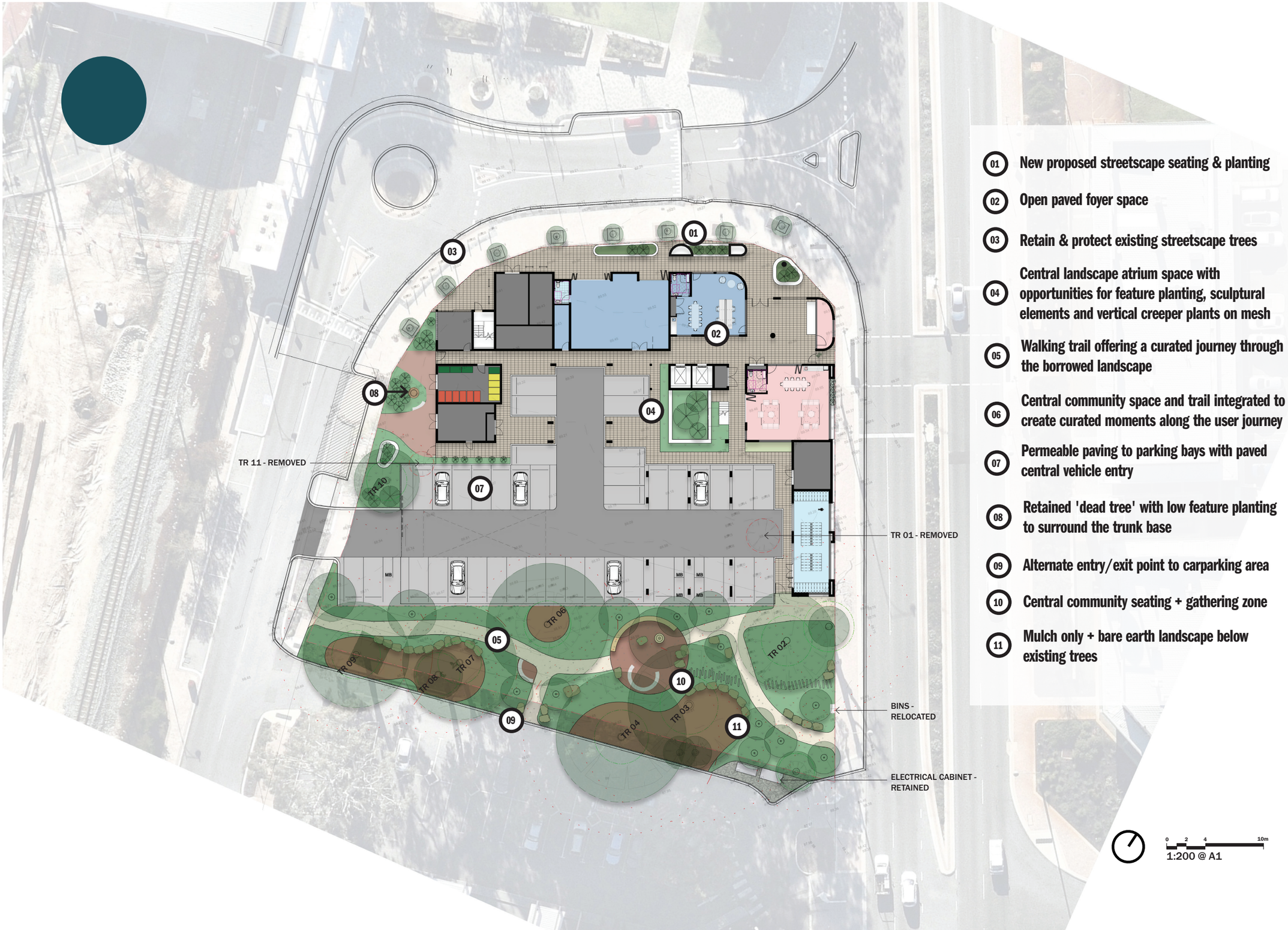
The landscape design aims to establish a clear hierarchy of space, offering public seating and places for rest & pause, in tandem with quiet garden moments internal to the building. While the design focusses on provision of amenity for residents, this will also benefit the community with a suitable place to gather or unwind.

Landscape elements are conceived as simple and robust and to celebrate natural materials and finishes. The car parking area presents an opportunity to provide some at source stormwater infiltration and to reduce heat island effect.

The project proposes to develop the public open space to the site's south to create a community gathering and walking space under the shade of the existing trees. Importantly this presents a significant opportunity for deep soil and tree canopy coverage as a legacy outcome.

This is an exciting opportunity for the community and residents to access this shared amenity supported by informal children's play and trails for exploration below the trees.

THE DESIGN



01 New proposed streetscape seating & planting

02 Open paved foyer space

03 Retain & protect existing streetscape trees

04 Central landscape atrium space with opportunities for feature planting, sculptural elements and vertical creeper plants on mesh

05 Walking trail offering a curated journey through the borrowed landscape

06 Central community space and trail integrated to create curated moments along the user journey

07 Permeable paving to parking bays with paved central vehicle entry

08 Retained 'dead tree' with low feature planting to surround the trunk base

09 Alternate entry/exit point to carparking area

10 Central community seating + gathering zone

11 Mulch only + bare earth landscape below existing trees

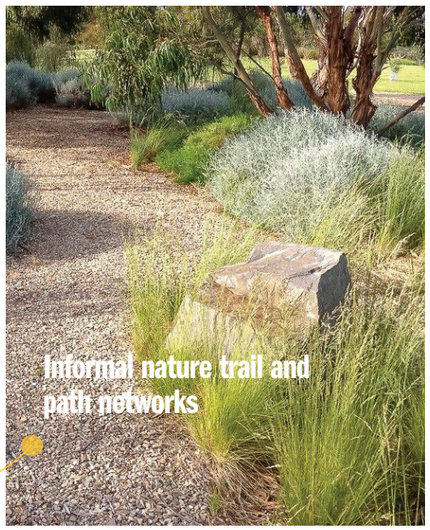
Landscape Quality

LANDSCAPE/COMMUNAL AMENITY

LOOK AND FEEL


Community spaces for seating gathering and gathering

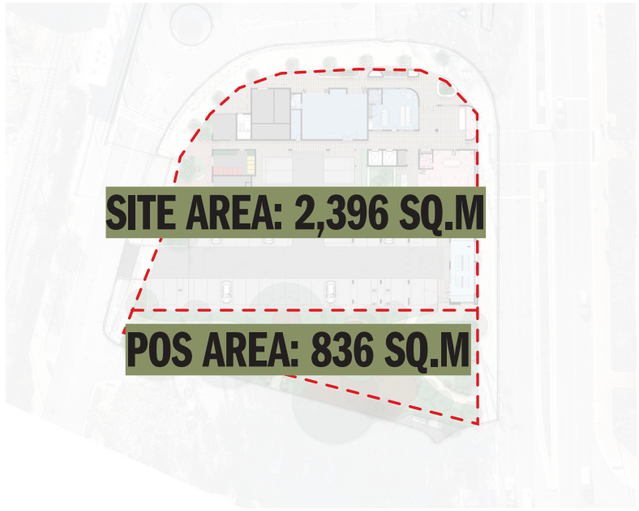

Informal nature play and trail


Informal nature trail and path networks


Retained existing trees


Opportunities for seating with garden backdrops

DEEP SOIL STRATEGY & CANOPY COVERAGE

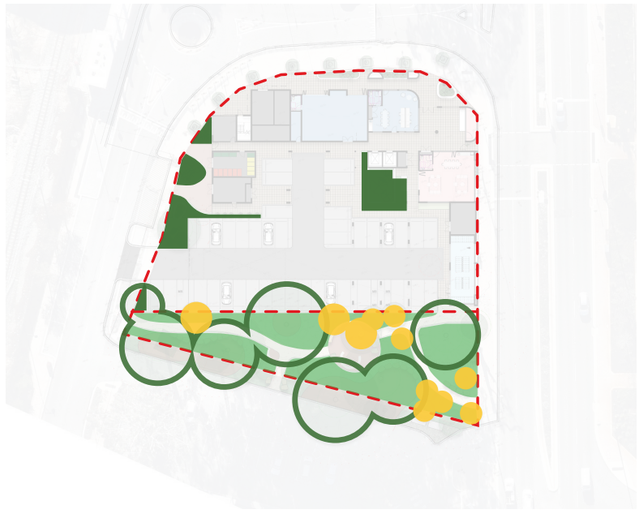


PROJECT - REQUIRED

TREES REQUIRED: 5 MEDIUM SIZED TREES

PROJECT OPPORTUNITY

UTILISE THE POS ARE TO ENHANCE LOCAL TREE CANOPY COVER, AMENITY AND DEEP SOIL AREA



PROJECT - PROPOSAL

110$_{m^2}$ /5% deep soil within lot
750$_{m^2}$/90% deep soil within POS
700$_{m^2}$ new tree canopy coverage

- GARDEN BED - SITE
- GARDEN BED - POS
- NEW TREE
- EXISTING TREE

PLANTING - DESIGN INTENT

TREE PLANTING - DESIGN INTENT

- Large canopy tree. 12m height at maturity
- Medium canopy tree. 8-12m height at maturity
- Small canopy tree. 3-8m height at maturity
- Feature shrub/tree. Up to 3m height at maturity

NOTES:

- → All trees installed at min. 45lt pot size
- → Advanced mature trees proposed in key common amenity locations

GREENSTOCK PLANTING - DESIGN INTENT

- Entry/Arrival planting. Textured & layered, Combination succulent and hardy species
- Informal garden planting. Low-med height shrubs. Predominantly native.
- Internal planting. Feature & low light.
- Feature/flowering planting. Combination texture & colour
- Creeper/climber plants
- Mulch only/bare earth. Minimal planting.

NOTES:

- → All landscape and garden bed areas will have permanent, automated irrigation.
- → POS area will have irrigation for establishment. Permanent irrigation status to be determined in coordination with Council.
- → Trees & large/feature shrubs will include bubblers as applicable.
- → Subject to project construction timing, planting will be prioritised in winter months.
- → All potted plants will be installed at a min. 140mm pot size.
- → Where applicable, feature and large shrubs will be installed at a min. 13Lt pot size.
- → All garden bed areas will include a min. of 75mm settled depth, mulch type to be determined in coordination with landscape contractor.
- → Mulch only/bare earth will comprise a shallow mulch layer.

Landscape Quality

TREE SPECIES

WA + AUS NATIVE SPECIES

Agonis flexuosa
*WA Weeping Peppermint *WA NATIVE*
Medium to Large Tree (10-20m+)
PSHB - Negligible

Corymbia calophylla
*Marri *AUS NATIVE*
Medium Tree (10-20m)
PSHB - High Risk

Eucalyptus caesia
*Silver Princess/ Gungurru *WA NATIVE*
Small Tree (1-14m)
PSHB - Not Listed

Eucalyptus victrix
*Dwarf Ghost Gum *WA NATIVE*
Small Tree (5-10m)
PSHB - Not Listed

Callistemon 'Kings Park Special
*Bottlebrush *WA NATIVE*
Small Tree (Up to 5m)
PSHB - Not Listed

Dicksonia antarcticas
*Forest Pansy *EXOTIC*
Small - Medium Tree (up to 5m)

EXOTIC + FRUITING SPECIES

Cesalpinia ferrea
*Leopard Tree *EXOTIC*
Small - Medium Tree (up to 8m)

Cercis canadensis
*Forest Pansy *EXOTIC*
Small - Medium Tree (up to 5m)

FEATURE PLANTING

Citrus spp
*Eureka Lemon *EXOTIC*
Small - Medium Tree (up to 8m)
PSHB - Low Risk

Agave attenuata
*Century Plant *Exotic*
Feature Plant (up to 1.5m)

Zamia furfuracea
*Cardboard Palm *Exotic*
Feature Plant (up to 1.5m)

Eucalyptus macrocarpa
*Mottlecah *WA Native*
Feature Shrub (up to 5.0m)

Landscape Quality

PLANT SPECIES

ENTRY & ARRIVAL PLANTING

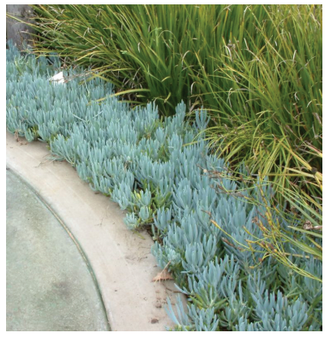
Lomandra 'Tanika'
*Lomandra *Aus Native*
Small Shrub
0.5m high x 0.65m wide

Adenanthos cuneatus
*Coastal Jugflower *WA Native*
Small Shrub
0.3m high x 2m wide

Dianella caerulea
*Blue Flax Lily *WA Native*
Herbaceous Grass
1m high x 2m wide

Hibbertia scandens
*Snake Vine *Aus Native*
Ground Cover/ Climber
3m high x 5m wide

Rhaphiolepis 'Snow Maiden'
*Indian Hawthorn *Exotic*
Shrub
1m high x 1.5m wide



Senecio mandraliscase
Blue Chalksticks **Exotic*
Succulent Groundcover
1m high x 1m wide

Casuarina glauca
*Casuarina Cousin it *Aus Native*
Ground Cover
0.2m x 2m

Dichondra 'Silver Falls'
*Silver Ponyfoot *Exotic*
Groundcover
0.05m high x 2m wide

Kennedia prostrata
*Running Postman *WA Native*
Groundcover
1.5m high x 3m wide

Chamelaucium uncinatum
*Geralton Wax *WA Native*
Shrub
5m high x 6m wide

Landscape Quality

PLANT SPECIES

INFORMAL GARDEN PLANTING

Anigozanthos flavidus
*Kangaroo Paw (hybrids) *WA Native*
Herbaceous
2m high x 1m wide

Hakea varia
*Hakea *Aus Native*
Shrub
0.4m high x 0.3m wide

Grevillea preissii spp.
*Spider Net Grevillea *Aus Native*
Shrub
1.7m high x 2m wide

Melaleuca viminea
*Mohan Melaleuca *WA Native*
Shrub/Tree
Up to 6m high x 1m wide

Hypocalymma robustum
*Swan River Myrtle *Aus Native*
Shrub
1.5m high x 1.5m wide

Pericalymma ellipticum
*Swamp Teatree *WA Native*
Medium Shrub
3m high x 1.5m wide

Melaleuca lateritia
*Robin Red-breast Bush *Aus Native*
Medium Shrub
2m high x 1.5m wide

Regelia ciliata
*Regelia *Aus Native*
Shrub
1.5m high x 2m wide

Scholtzia involucrata
*Spiked Scholtzia *Aus Native*
Shrub
1.5m high x 2m wide

Gastrolobium celsianum
*Swan River Pea *WA Native*
Shrub
1m high x 3m wide

Landscape Quality

PLANT SPECIES

INTERNAL PLANTING

Stephanotis floribunda
*Madagascar Jasmine *Exotic*
Grondcover/Creeper
6m high x 2m wide

Arthropodium cirratum
*Renga Lily *Exotic*
Shrub
0.6m high x 0.6m wide

Trachelospermum jasminoides
*Star Jasmine *Aus NATIVE*
Climber/Groundcover (up to 2m)

FEATURE PLANTING

Agave attenuata
*Century Plant *Exotic*
Feature Plant
1.5m high x 0.8m wide

Zamia furfuracea
*Cardboard Palm *Exotic*
Palm
1.3m high x 2m wide

Eucalyptus macrocarpa
*Mottlecah *WA Native*
Shrub
4m high x 3m wide

GROUNDCOVER + CASCADING PLANTS

Scaevola crassifolia
*Fan Flower *AUS NATIVE*
Small Shrub
0.1m x 1.5m

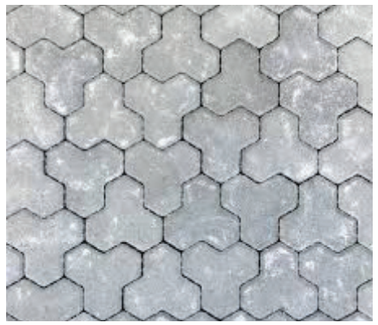
Casuarina glauca
*Casuarina Cousin it *Aus Native*
Ground Cover
0.2m x 2m

Kennedia prostrata
*Running Postman *WA Native*
Groundcover
1.5m high x 3m wide

LANDSCAPE/COMMUNAL AMENITY

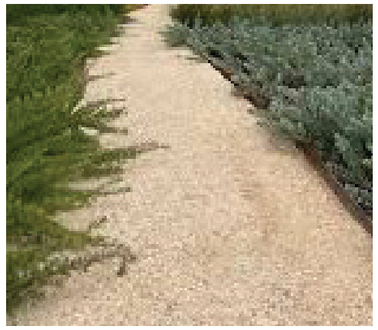
STRATEGY - TRAFFICABLE SURFACES



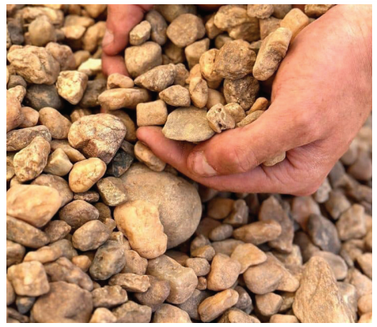


STRATEGY - PEDESTRIAN SURFACES





STRATEGY - NATURAL ELEMENTS




STRATEGY - FIXED FURNITURE



BUILT FORM & SCALE

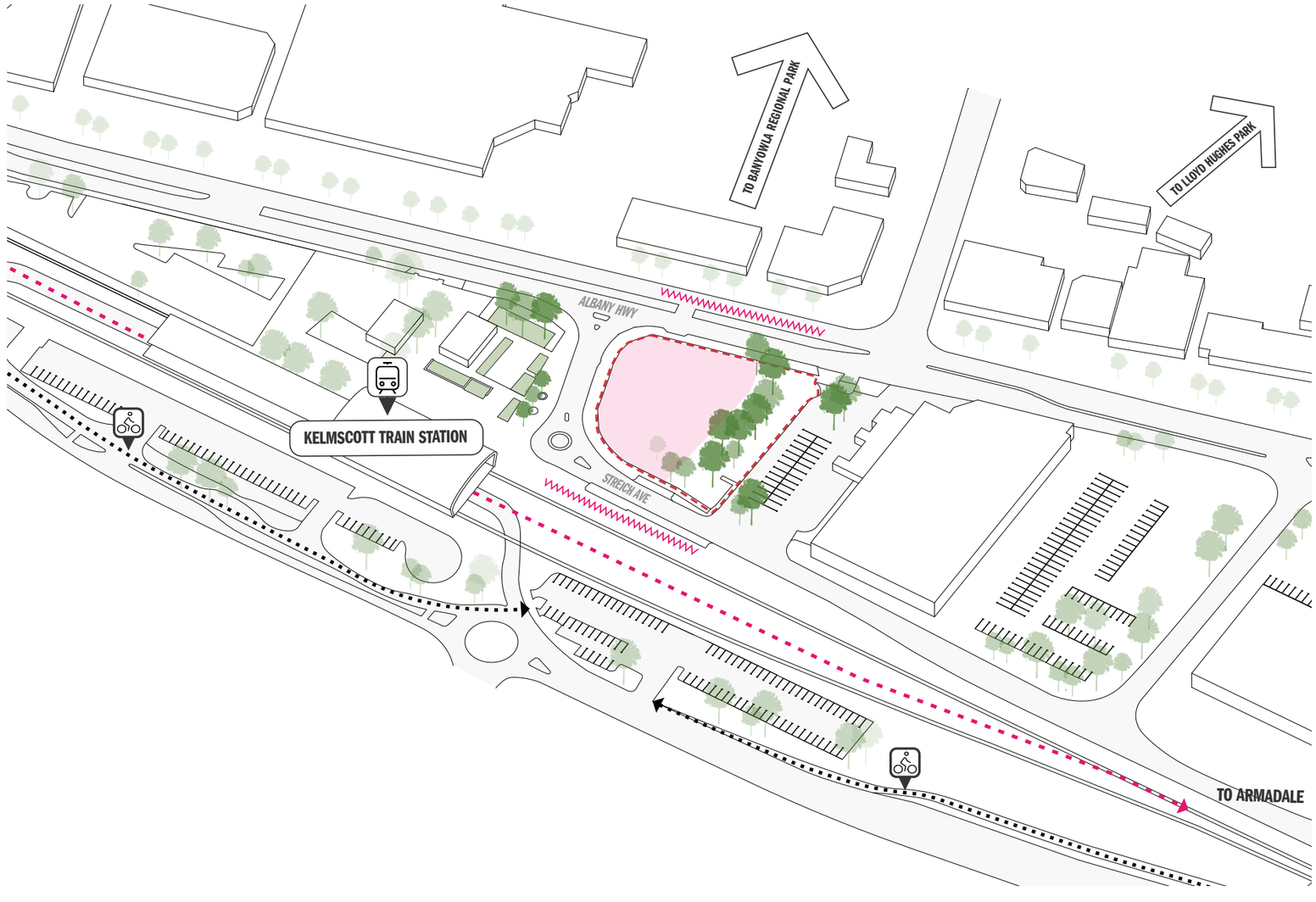
Built Form & Scale

OPPORTUNITIES & CONSTRAINTS

The development site is centrally located in the Kelmscott town centre, sitting between Albany Highway and the Armadale train line and directly opposite the station plaza. The proposal acknowledges the sites urban context by siting of the built form to directly address Albany Highway and the station plaza, with articulation of built form to accentuate the landmark corner.

The buildings mass is broken in to 3 parts to reduce the perceived bulk and scale of the development whilst providing opportunity for a site responsive approach to materiality and colour in the building envelope across these volumes.

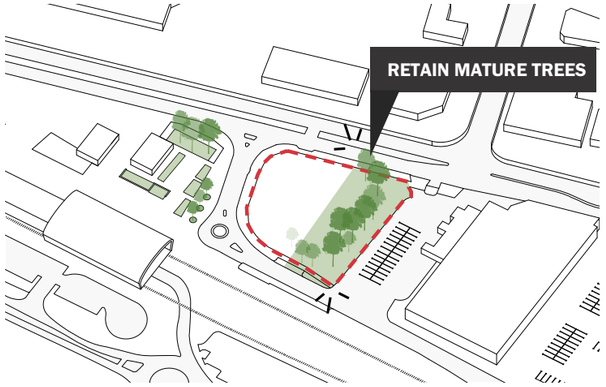
Building services and at-grade carpark are situated to the western boundary along the rail corridor, whilst active uses are located adjacent to the station plaza and Albany Highway to provide activation and passive surveillance to the public realm.



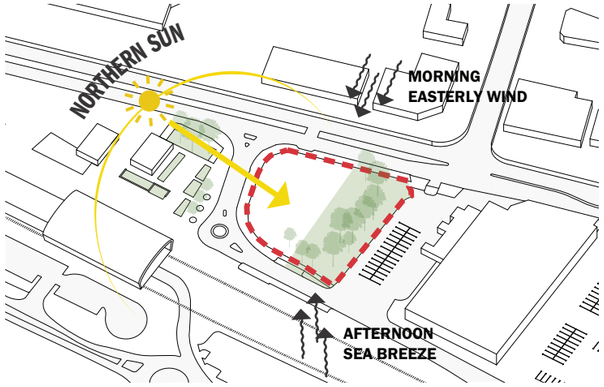
- ROAD/RAIL NOISE
- BICYCLE PATH
- RAILWAY
- LOT BOUNDARY
- RETAIN SIGNIFICANT TREES

Built Form & Scale

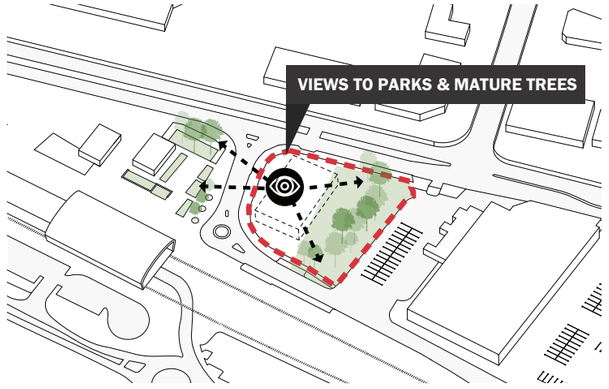
DESIGN CONSIDERATIONS



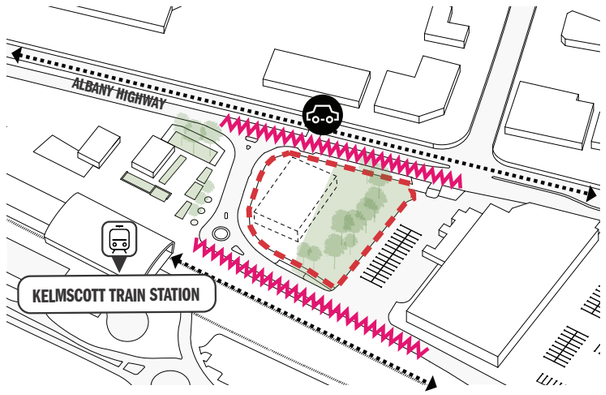
RETAIN SIGNIFICANT TREES ON SITE AND CREATE ADDITIONAL DEEP SOIL PLANTING ON SITE



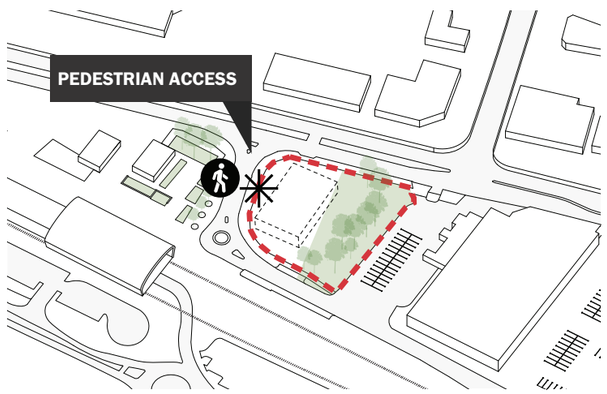
MAXIMISE NORTHERN ORIENTATION AND UTILISE PREVAILING WINDS FOR PASSIVE COOLING



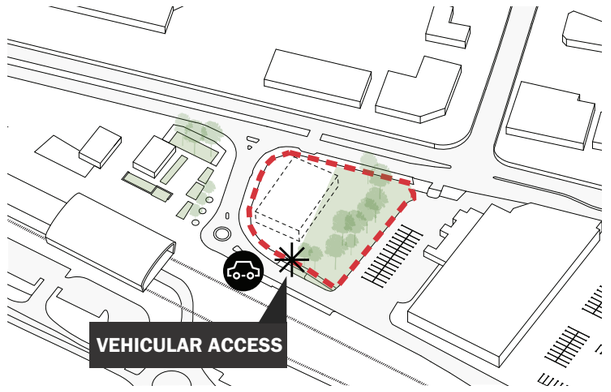
ORIENTATION OF APARTMENTS TO OVERLOOK EXISTING PARK AND MATURE TREE CANOPY



ORIENTATION TO MITIGATE ROAD/RAIL NOISE

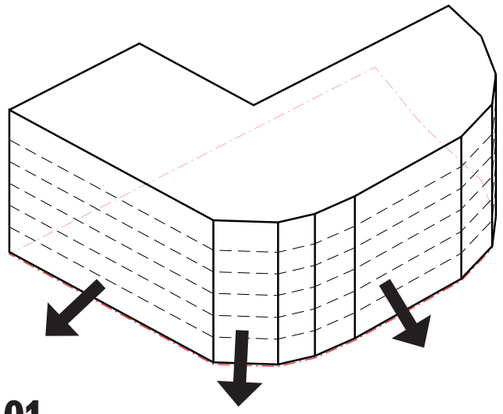


PEDESTRIAN ENTRY POINT ADJACENT TO STATION PLAZA, FURTHER ACTIVATING PUBLIC REALM

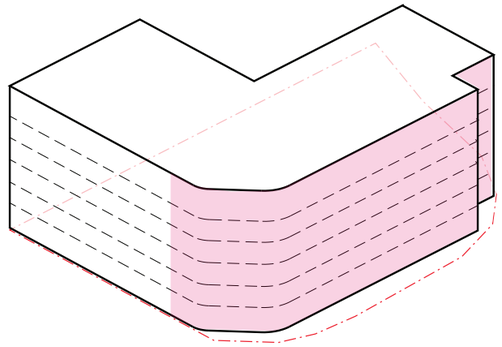


ENTRY POINT FOR VEHICLES/GROUND LEVEL PARKING FROM STREICH AVE.

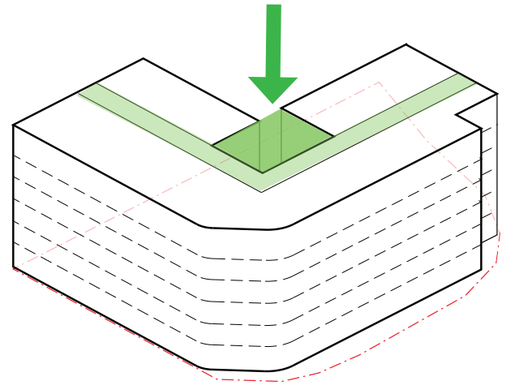
BUILT FORM & MASSING



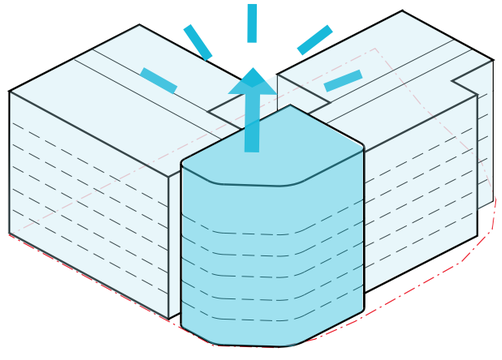
01.
BUILDING MASS SITUATED TO ADDRESS KEY CORNER & STATION PLAZA



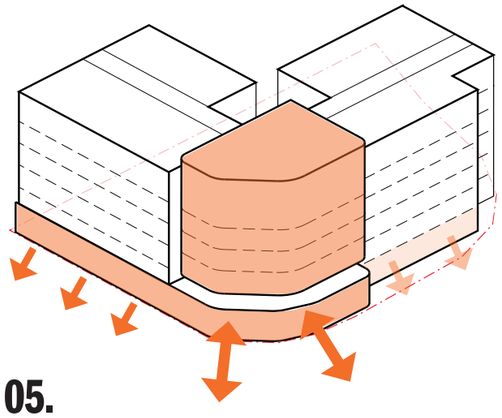
02.
RATIONALISE BUILDING ENVELOPE



03.
CENTRAL ATRIUM AND OPEN CORRIDORS



04.
BREAK BUILDING MASS AND ARTICULATE CORNER



05.
PEDESTRIAN SCALE PODIUM DEFINES ENTRY AND PUBLIC INTERFACE

06.
MATERIALITY AND COLOUR PALETTE REFERENCES NATURAL HUES OF THE DARLING SCARP

FUNCTIONALITY & BUILD QUALITY

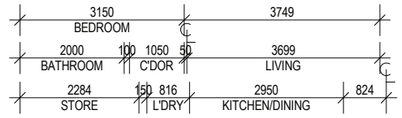
DEVELOPMENT SUMMARY

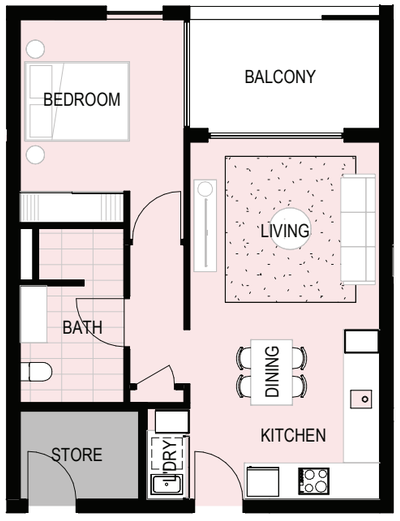
LOTS 818, 1092 & 1751 ALBANY HWY KELMSCOTT - YIELD SCHEDULE							
Level		Social	Affordable		Total Dwellings	Commercial (m2)	Parking
		1x1 Bed	1x1 Bed	2x1 Bed			
8							
7							
6							
5		3	3	7	13		
4		3	3	7	13		
3		3	3	7	13		
2		3	3	7	13		
1		3	4	6	13		
Ground							39
TOTAL		15	16	34	65	0	39
		23%	25%	52%	100%		

Functionality & Build Quality

APARTMENT PLANS

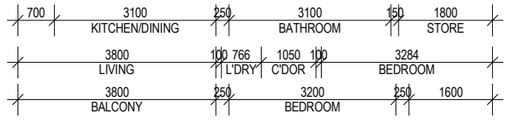
The apartment plans are based on a kit-of-parts design approach, guided by principles of optimisation, efficiency, and durability. Modular and repeatable planning elements are used to maximise construction efficiency and reduce material waste, allowing flexibility across different apartment typologies while maintaining design consistency.

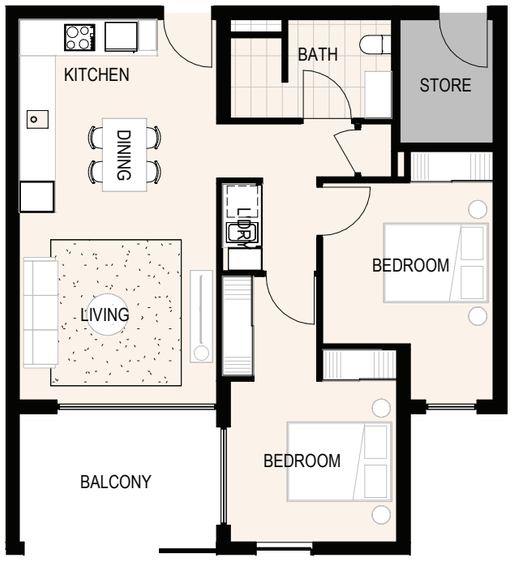


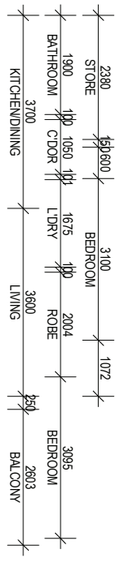


TYPE 1

BEDS	1
BATHS	1
INTERNAL AREA	49.8sqm
LIVEABLE HOMES LEVEL	SILVER

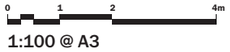






TYPE 2A

BEDS	2
BATHS	1
INTERNAL AREA	69.0sqm
LIVEABLE HOMES LEVEL	SILVER



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Functionality & Build Quality

APARTMENT PLANS

TYPE 2B

BEDS	2
BATHS	1
INTERNAL AREA	70.0sqm
LIVEABLE HOMES LEVEL	SILVER

TYPE 2C

BEDS	2
BATHS	1
INTERNAL AREA	72.2sqm
LIVEABLE HOMES LEVEL	SILVER

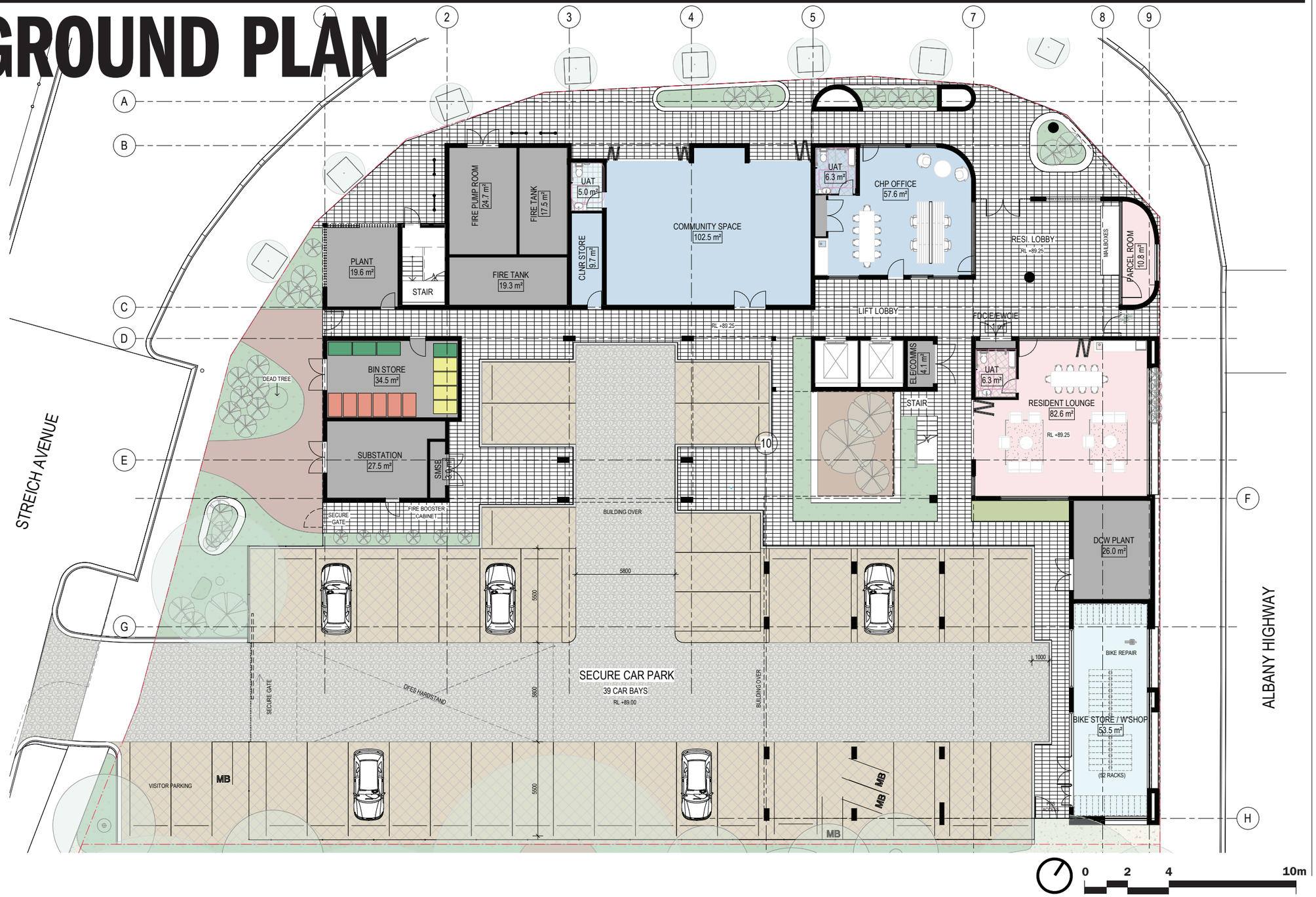
0 1 2 4m
1:100 @ A3

Functionality & Build Quality

GROUND PLAN WITH CONTEXT

Functionality & Build Quality

GROUND PLAN



0 2 4 10m

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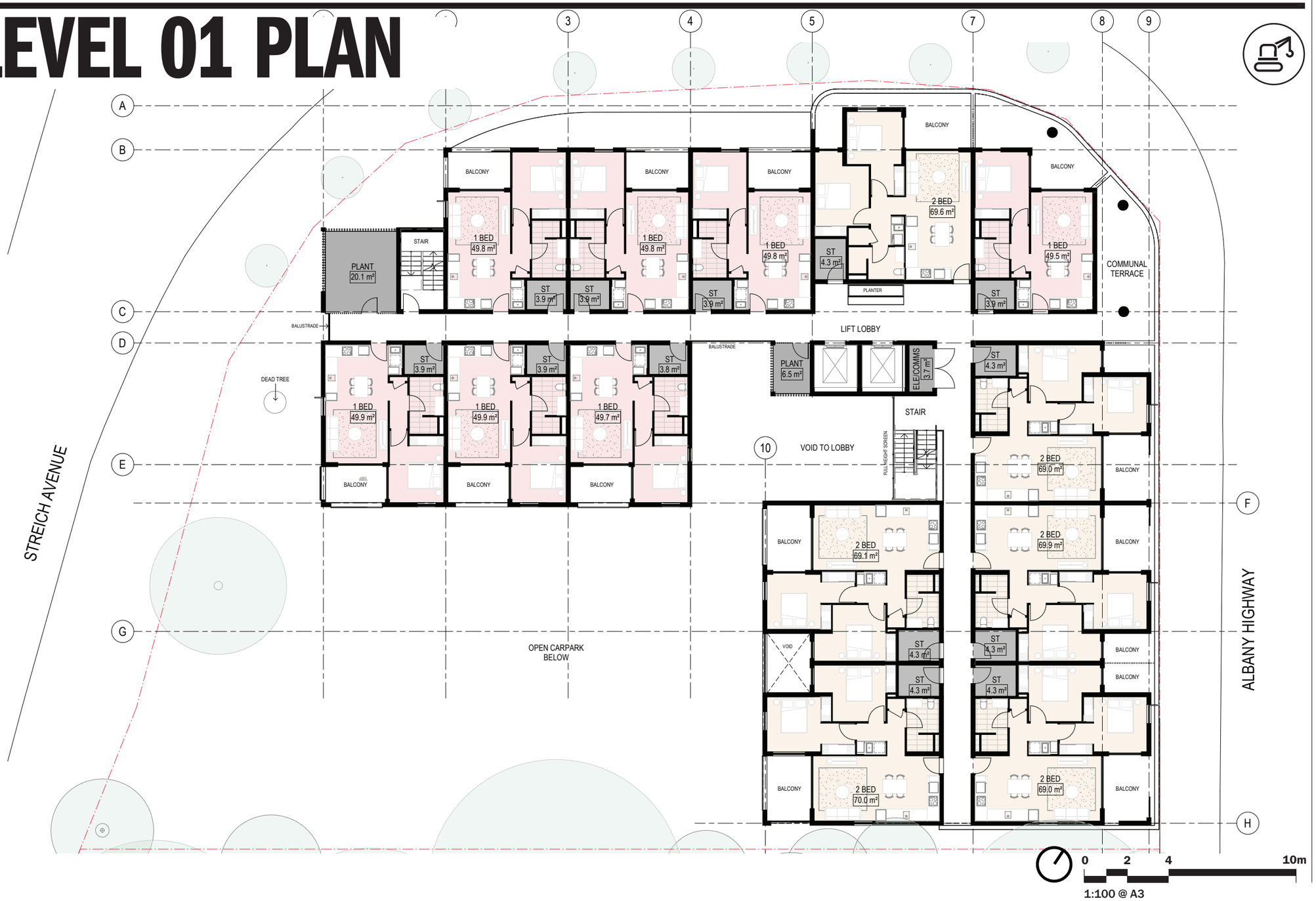
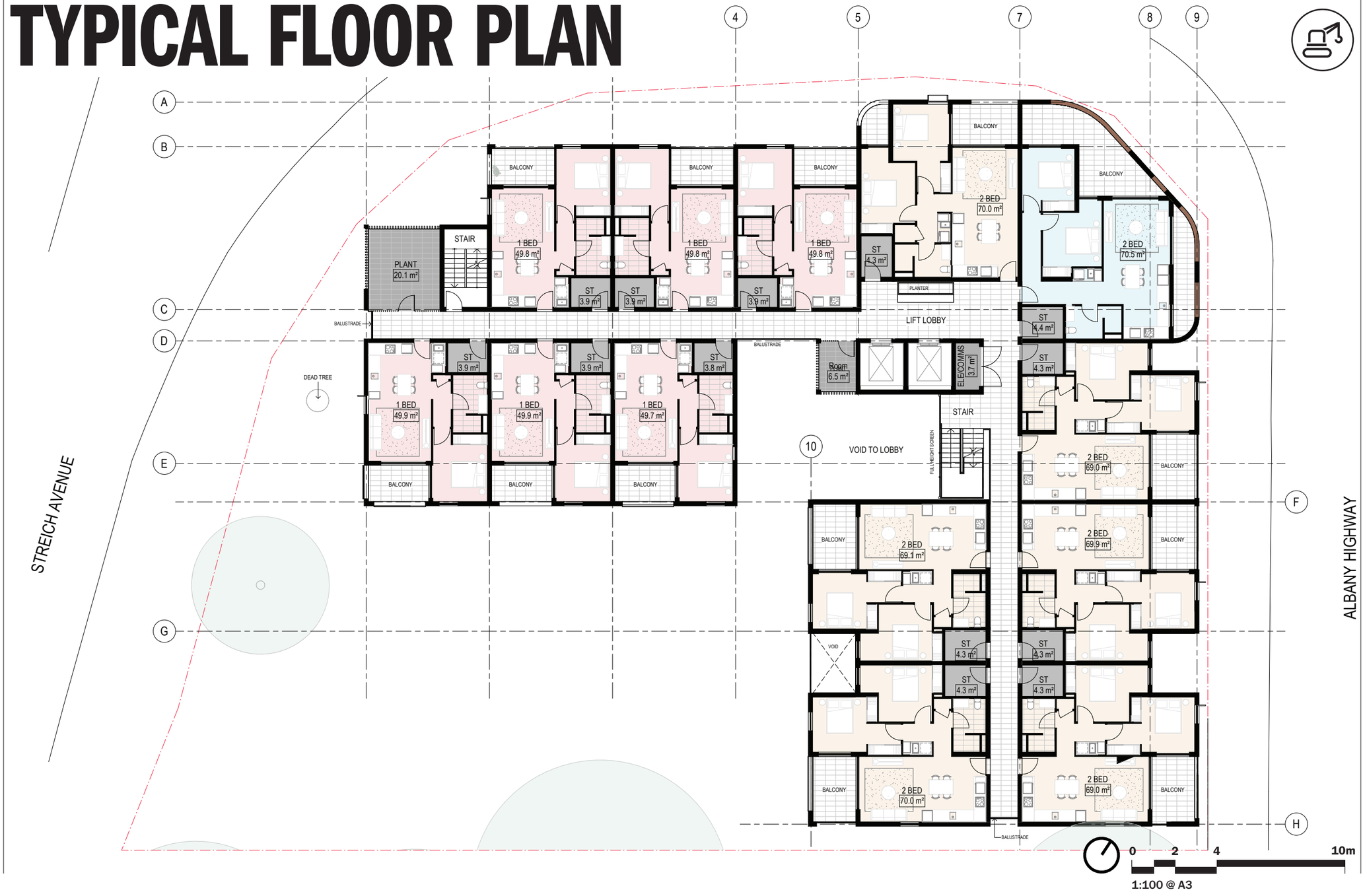
Functionality & Build Quality

LEVEL 01 PLAN



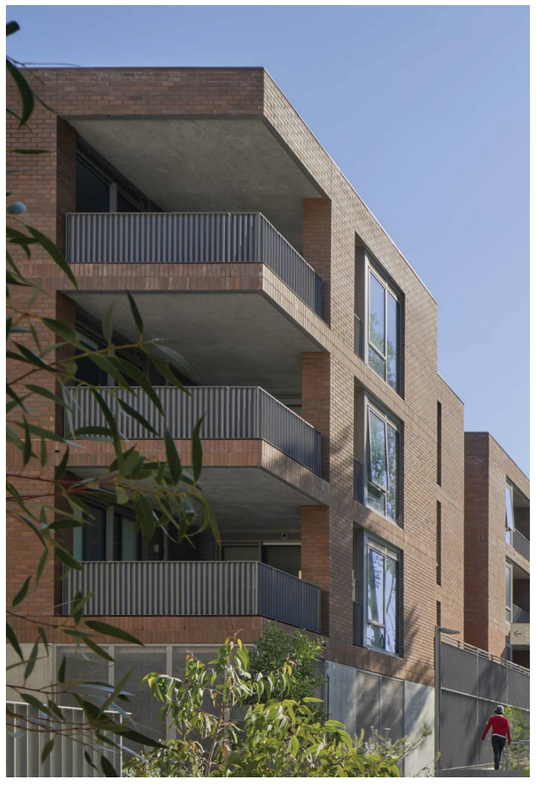
Functionality & Build Quality

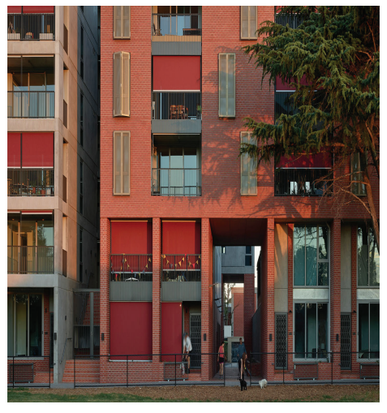
TYPICAL FLOOR PLAN



PRECEDENT IMAGERY

BUILT FORM & ENVELOPE



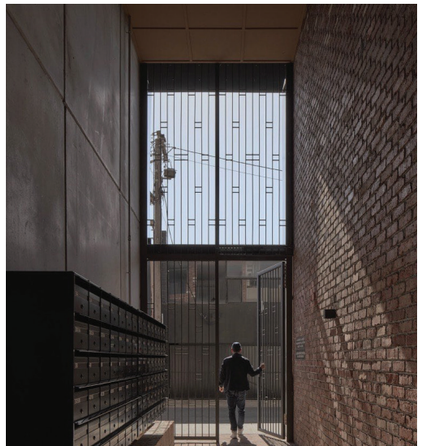


Functionality & Build Quality

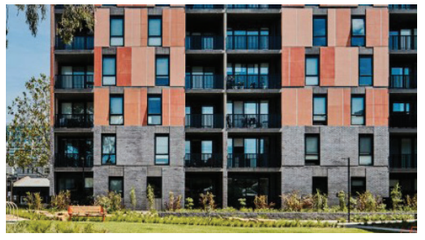
PRECEDENT IMAGERY

COMMUNAL & CIRCULATION SPACES





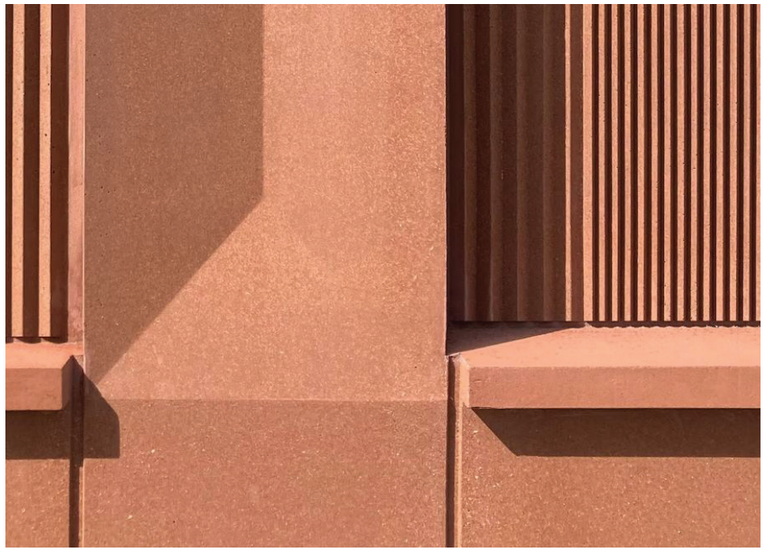


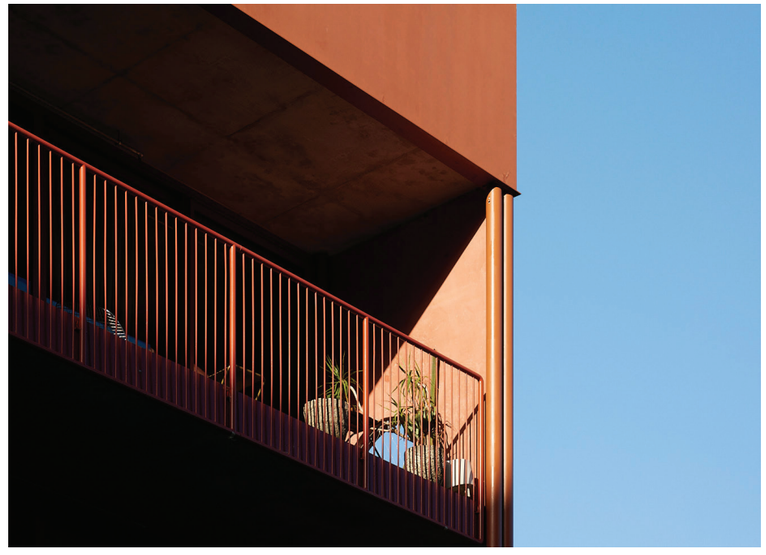




Functionality & Build Quality

ARCHITECTURAL APPROACH

BUIDLING ENVELOPE & MATERIALITY





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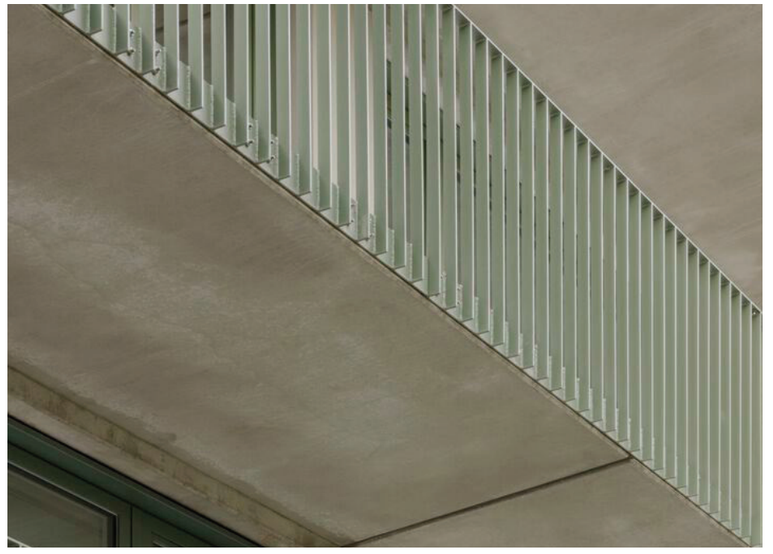
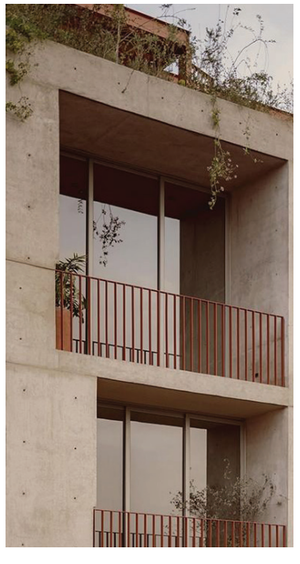
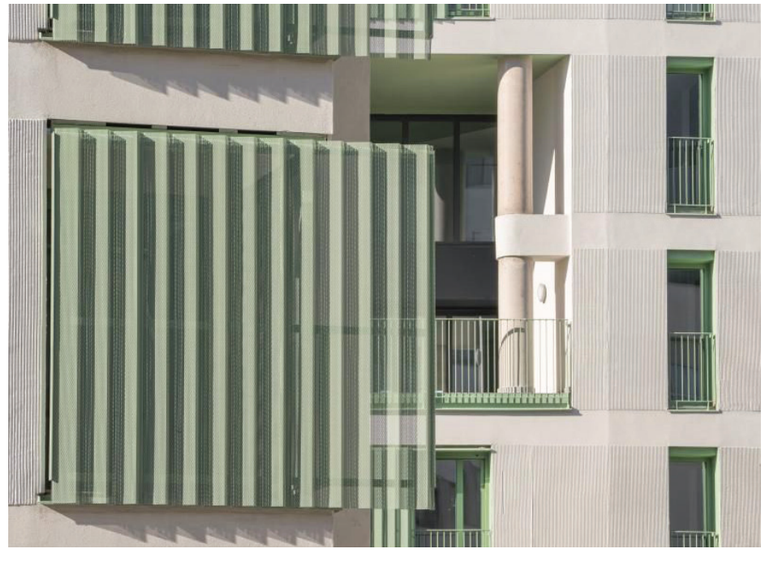
Functionality & Build Quality

ARCHITECTURAL APPROACH

BUIDLING ENVELOPE & MATERIALITY







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SUSTAINABILITY

SUSTAINABILITY

PROJECT STRATEGY

01 Prioritizing occupant health and wellbeing. A climate responsive design tailored to local climate conditions, prioritizing thermal comfort, natural ventilation, and effective shading strategies.

02 Reduction in waste and optimisation Green building materials with a focus on standardisation of building components in order to minimise unnecessary building elements. Using a kit of parts model approach.

03 Sustainable landscaping integrated at ground level. Retention of significant trees on site.

04 Regenerative design - Materiality of carpark surfacing and integration with landscape design to reduce heat island effect.

05 Energy efficient design maximizes natural light and minimizes the need for artificial lighting and heating.

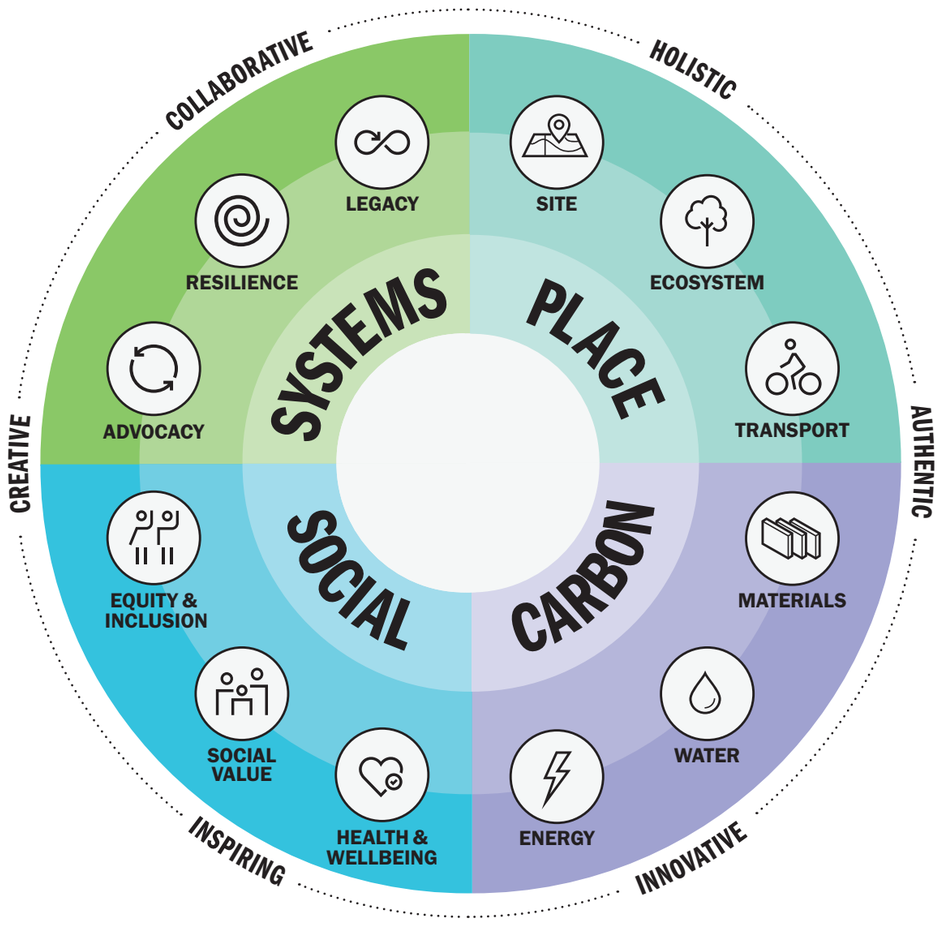
06 Waste management strategy including composting organic waste and recycling facilities for residents and businesses

07 Consideration of Discontinuous Heat Recovery Ventilation (HRV) System to provide constant fresh clean air into apartments.

08 Renewable energy - large PV array to residential rooftops

09 Social value with resident focused with spaces created for communal and community connection and promotion of sustainable living practices

10 Connection to Kelmscott Train Station and Armadale Line PSP reduces the reliance on cars



Sustainability

NATURAL VENTILATION

TYPICAL LEVEL

60% of apartments achieve natural ventilation as per SPP 7.3 design guidelines

The ventilation percentage is achieved through utilising single aspect dwellings oriented between 45^0 and 90^0 of the prevailing cooling wind direction when dual aspect ventilation is not possible as per A 4.2.2 in the R-Codes Volume 2 2019.

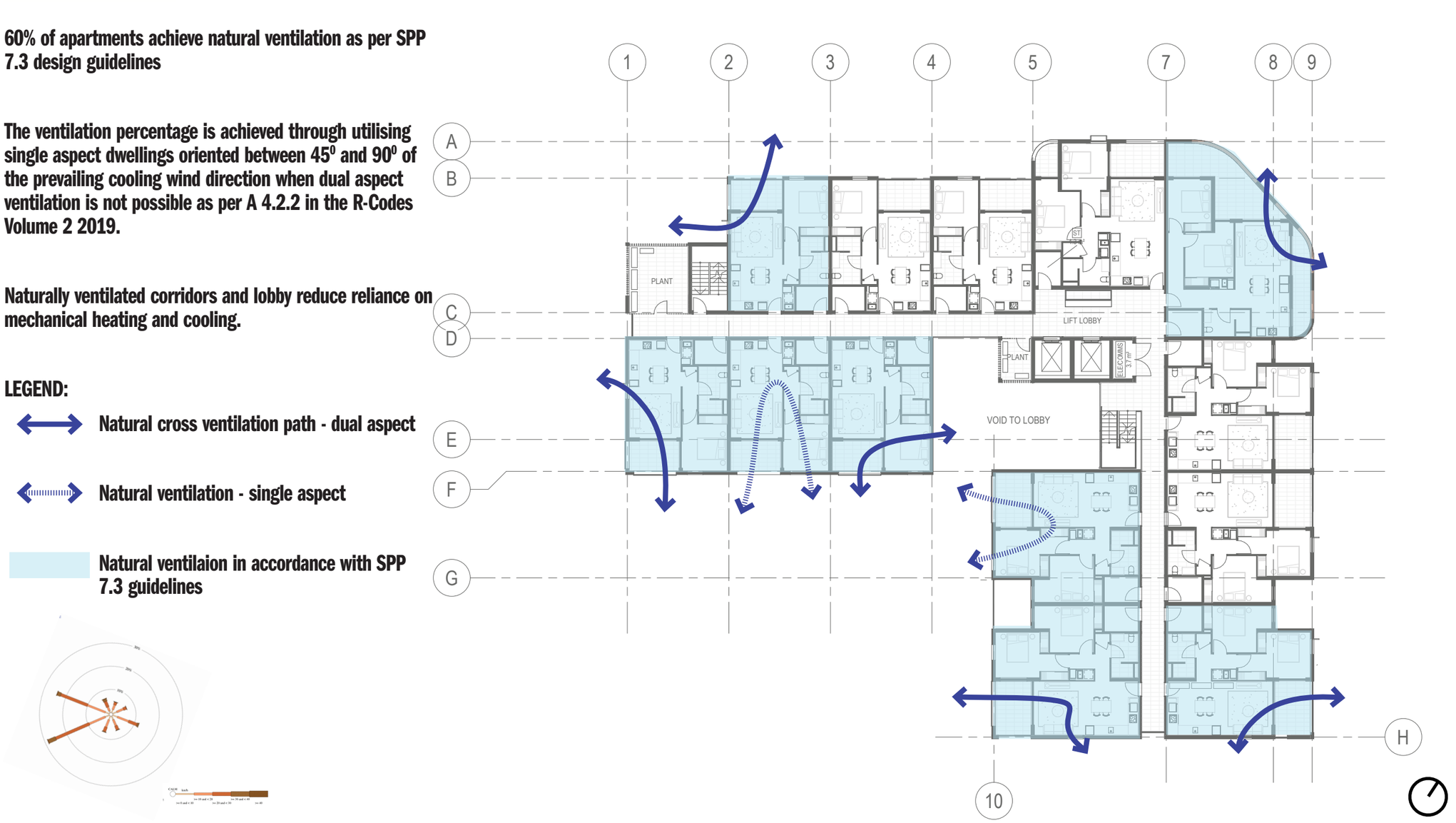
Naturally ventilated corridors and lobby reduce reliance on mechanical heating and cooling.

LEGEND:

Natural cross ventilation path - dual aspect

Natural ventilation - single aspect

Natural ventilaion in accordance with SPP 7.3 guidelines



Sustainability

SOLAR ACCESS

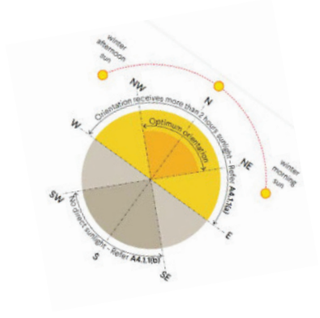
TYPICAL LEVEL

70% of apartments achieve ample sunlight for 2+ hours between 9am and 3pm on June 21st as per SPP 7.3 design guidelines

LEGEND:

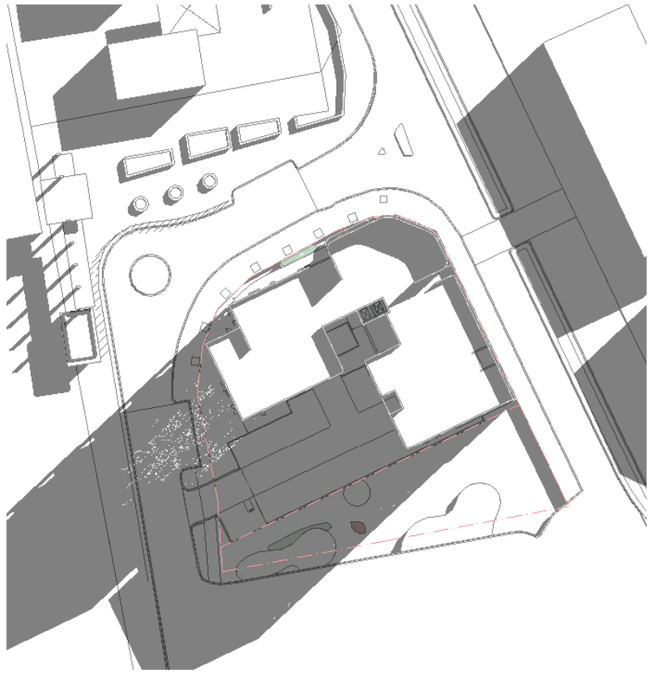
Apartment receiving >2 hours of sunlight to the living area and private open space.

Window/glazing locations

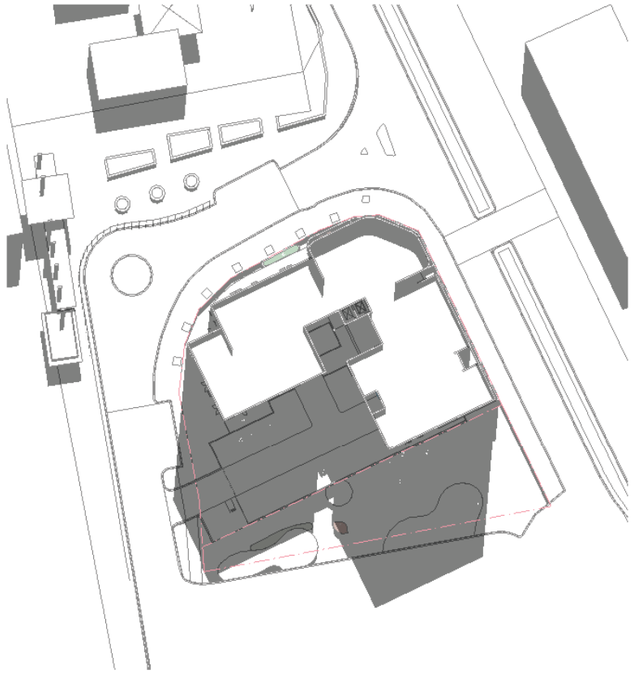


Sustainability

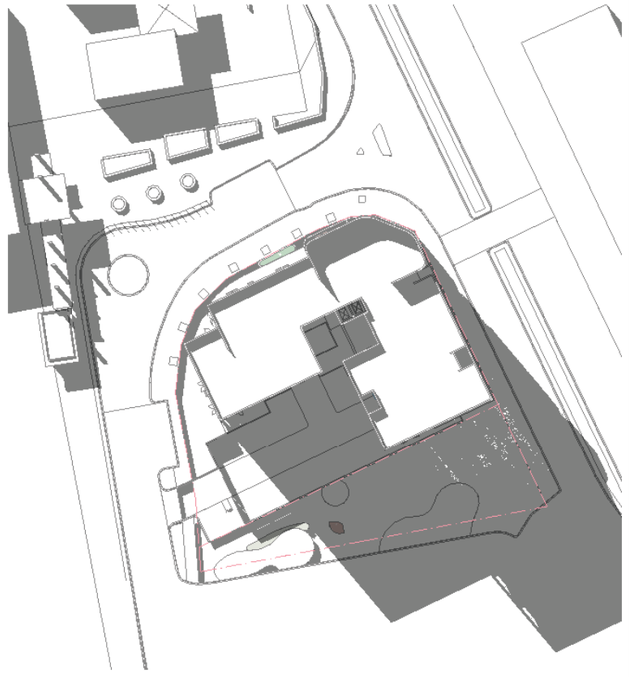
OVERSHADOWING



DA_WINTER SOLSTICE 9AM



DA_WINTER SOLSTICE 12PM



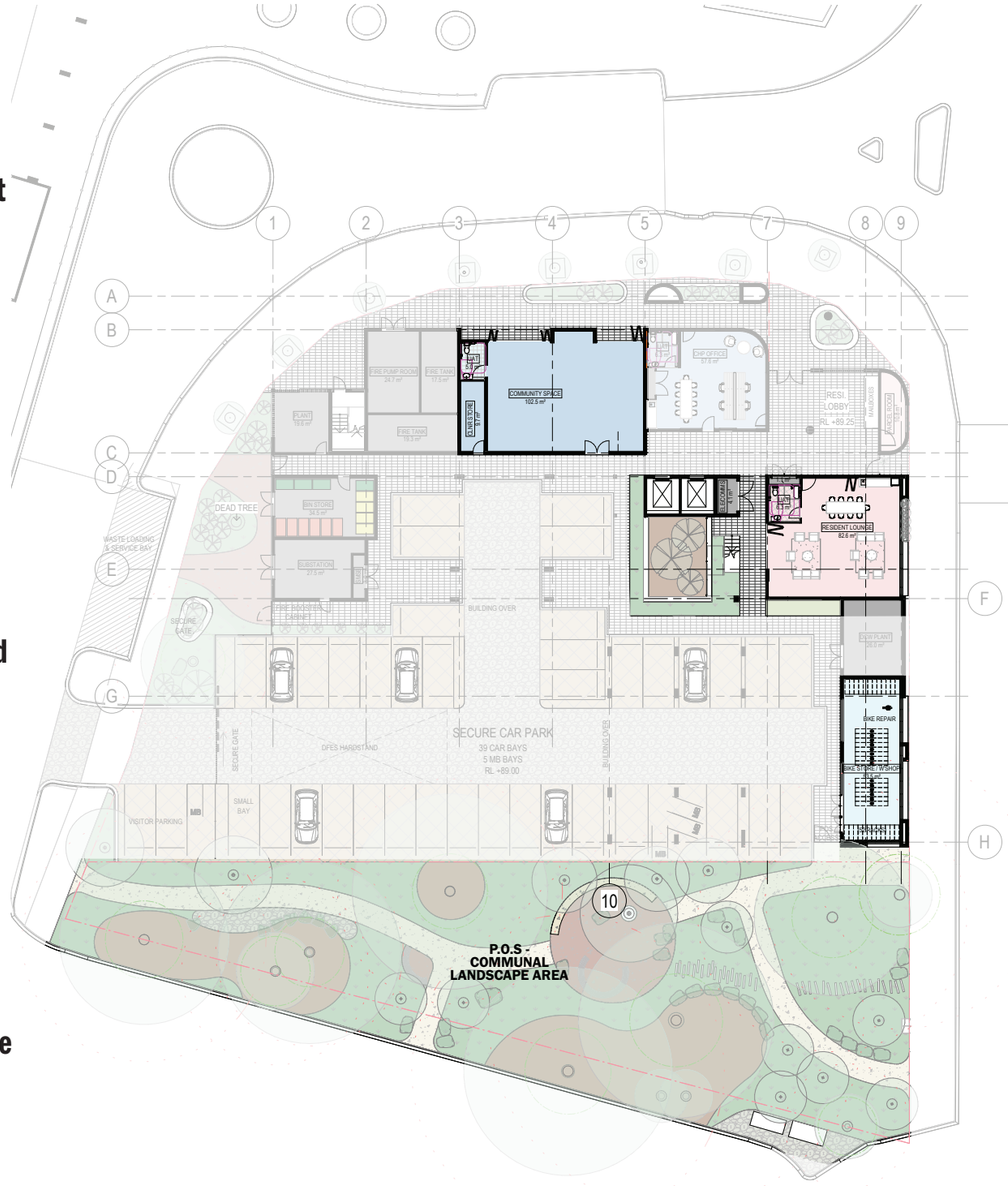
DA_WINTER SOLSTICE 3PM

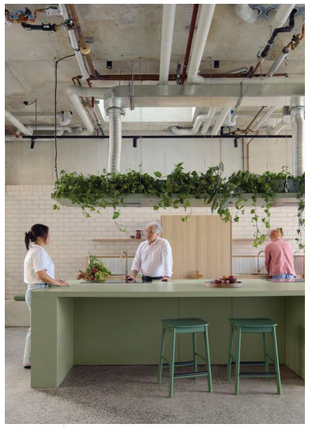
AMENITY

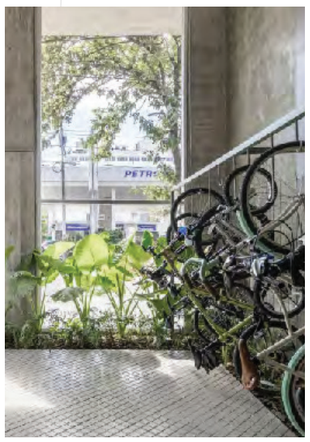
AMENITY

GROUND FLOOR

- The proposal delivers a number of spaces both indoor and outdoor that provide resident amenity and support social connection.
- At ground level active street frontages and communal lounge, dining and multi-purpose spaces provide amenity and cater to groups of varying sizes and also the wider Kelmscott community.
- A generous open air atrium sits at the buildings core and brings light and greenery into the central circulation spaces. The open central stair allows for social interaction and encourages use of the stairs in lieu of lifts.
- Generous, bright and open bike storage areas encourage alternative modes of transport and leverage the sites adjacency to the rail PSP.
- The communal landscaped area within the POS to the south of the building creates a 'backyard' for residents and provides amenity to the wider Kelmscott community.







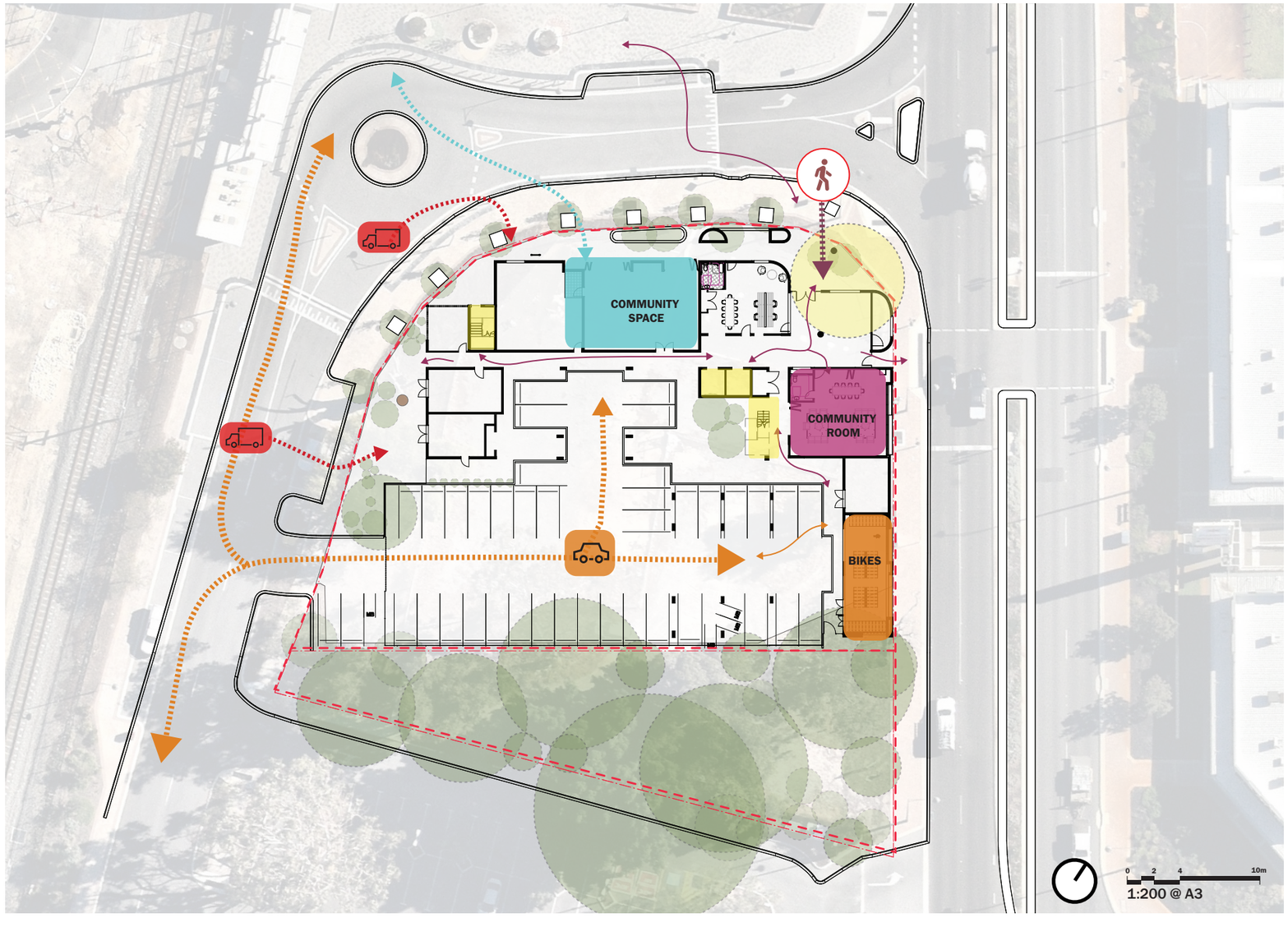
LEGIBILITY

Legibility

ACCESS & WAYFINDING

GROUND FLOOR

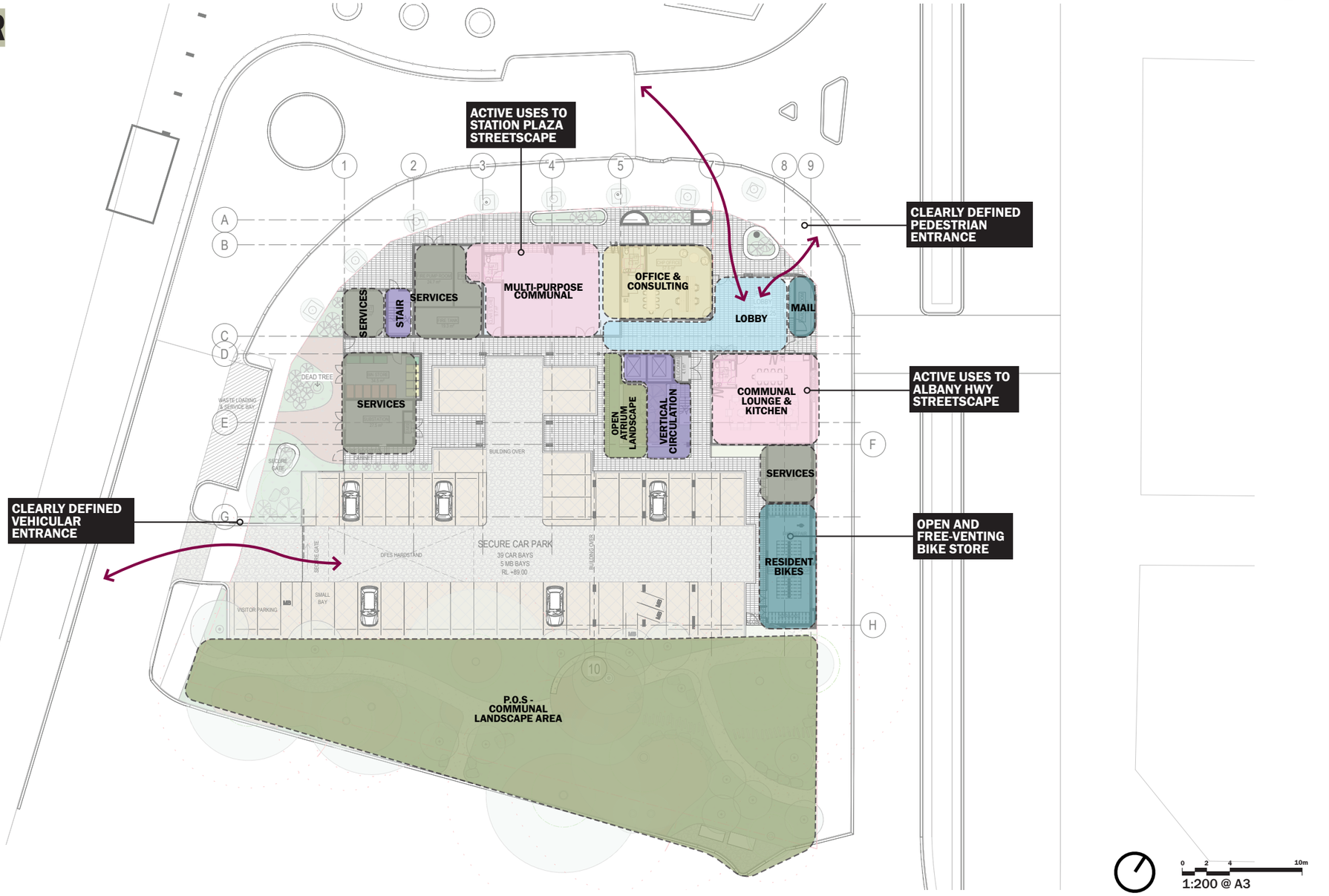
- The site features a clear spatial hierarchy with intuitive navigation and logical sightlines.
- Staircases are placed as visual markers along key sightlines, utilizing natural light and distinctive finishes to encourage movement.
- Entries are clearly marked with signage, landscaping and lighting, creating a strong sense of address and connection.
- Ease of level changes to comply with universally accessible requirements as per AS 1428.1.
- Pedestrian paths are direct, shaded, and accessible, providing a legible path of travel throughout the building.
- Vehicular access from Streich Ave to promote pedestrian friendly environment to station plaza.



Legibility

ACCESS & MOVEMENT

GROUND FLOOR



SAFETY

SAFETY & SECURITY

GROUND FLOOR

- Secure access from station plaza. Active uses to North and East of Ground Floor promote passive surveillance of surrounding area.
- CHP office visually connected to lobby, public realm and building core.
- Open staircases provide visual markers and allow passive surveillance to public realm and inside development.
- Open walkways and ends to corridors promote visual connectivity within development and align with CPTED principles.
- Secondary egress doors allow choice in exit paths for residents.
- Secure gate to parking area and secure fence provided between car park and pocket park.
- Pedestrian paths are direct, shaded, and accessible, linking buildings, communal spaces, and transport nodes with comfortable, legible routes.

Safety

CPTED PRINCIPLES

GROUND FLOOR

1. SURVEILLANCE

The design maximises opportunities for appropriate passive surveillance, with active surveillance employed only employed where passive surveillance is not achievable / sufficient.

2. TERRITORIAL DEFINITION

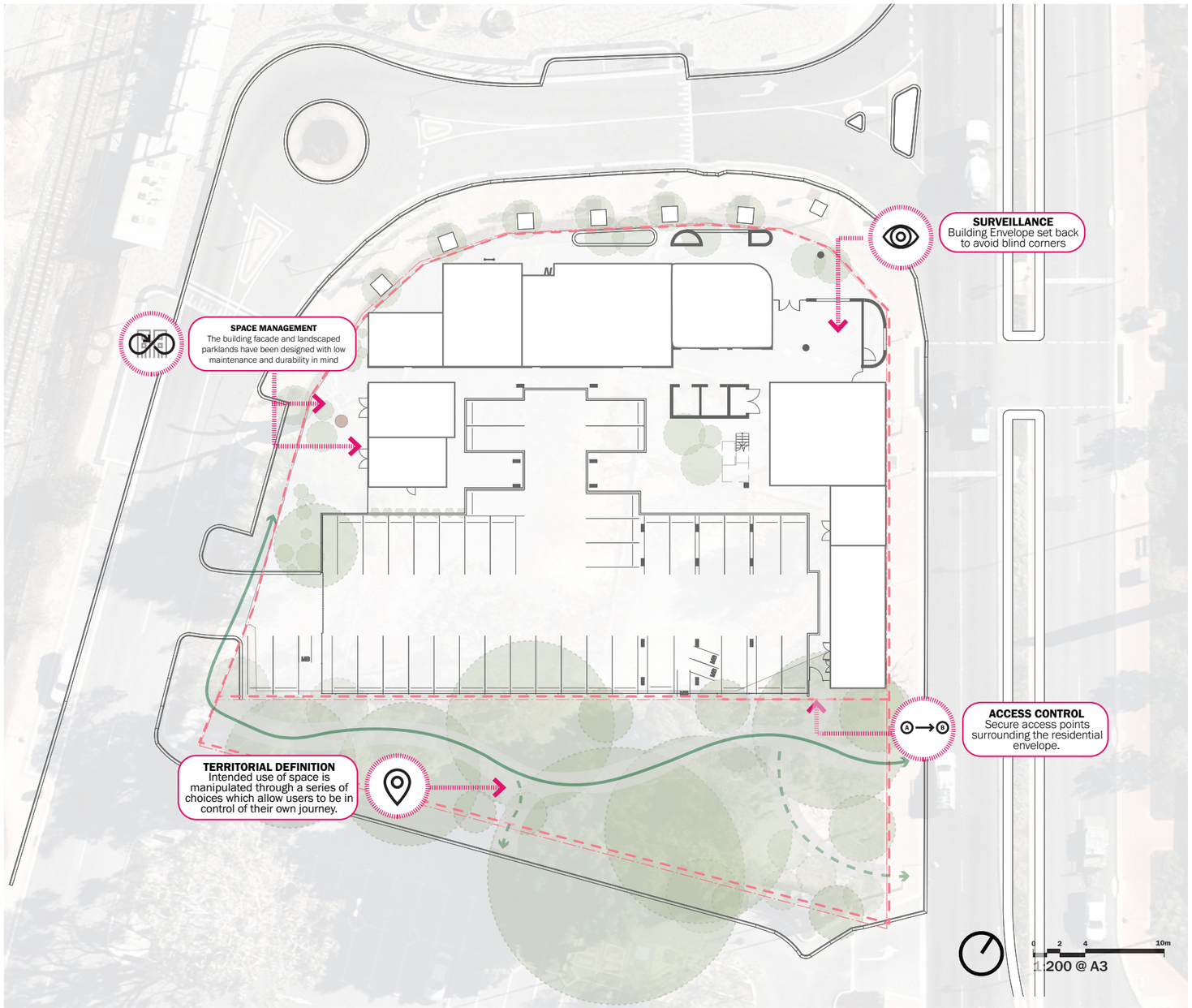
The design actively indicates a space's intended use whilst still creating a welcoming environment. Demarcation between public and private space is created through cues like, vegetation and change of materiality.

3. ACCESS CONTROL

The design aims to maximise opportunity for natural access control, with formal access control implemented along the residential boundaries.

4. SPACE MANAGEMENT

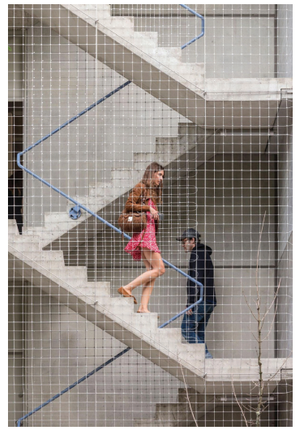
The design has focused on the use of low maintenance and durable materiality within both the architectural and landscaped zones.

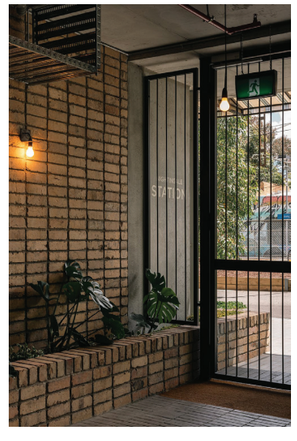


Safety

SAFETY & SECURITY

TYPICAL FLOOR





COMMUNITY

COMMUNITY

A generous landscaped public open space is to be provided to the south of the proposed building that will contribute to the wider Kelmscott community and enhance the existing streetscape and public realm.

Public art opportunities are to be developed and integrated into the ground level public spaces, within the station plaza and public open space, that contribute to the wider community and build on the rich Whadjuk Noongar history of the area.

Within the development a variety of communal spaces and activity areas are provided at ground level, and Level 1, with the open stair and atrium encouraging community interaction between residents and visitors.

The provision of active edges and passive surveillance create a welcoming and connected place that positively contributes to the wider community.

AESTHETICS

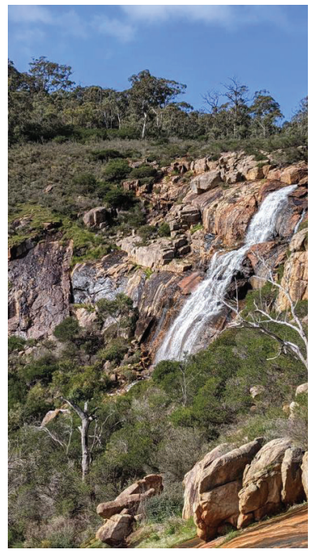
AESTHETICS

The architectural form creates a landmark building that is befitting its prominent location in the Kelmscott town centre. The corner form is expressed to address the key corner of Albany Highway and the station plaza, acting as an urban marker and also assisting with legibility in identifying the buildings entrance.

A single story podium element contains the pedestrian entrance and wraps around the entire Albany Highway elevation, providing a human scale to the development and breaking up the bulk and scale.

Warm and earthy tones have been applied to the precast concrete at the corner and podium, with additional relief texture proposed to the podium and elements of the upper building to provide visual interest and, along with feature tiles at ground level, a more tactile palette for the pedestrian realm.

Green coloured balustrades and screens sit within a neutral white concrete and along with the feature red/ochre colours create a visual reference to the nearby scarp and its unique landscape.

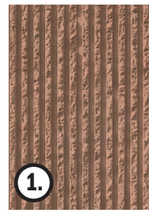


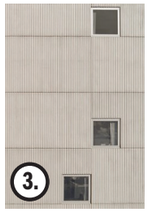
Aesthetics

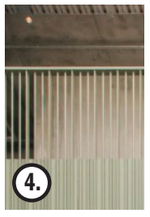
ARCHITECTURAL APPROACH

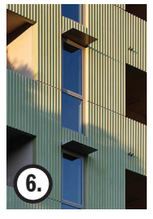
MATERIALITY

1. PROFILED COLOURED CONCRETE (COLOUR 1)
2. FLAT COLOURED CONCRETE (COLOUR 2)
3. WHITE CONCRETE
4. CUSTOM COLOURED METAL BALUSTRADE
5. PERFORATED COLOURED METAL BALCONY SCREEN
6. AWNING WINDOW
7. FEATURE TILES TO PODIUM RECESS









APPENDIX

EAST ELEVATION

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Hassell ©

0 1 2 4m
1:100 @ A3

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NORTH ELEVATION

Social & Affordable Housing - HAFF Kelmscott
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Hassell ©

0 1 2 4m
1:100 @ A3

SOUTH ELEVATION

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0 1 2 4m
1:100 @ A3

WEST ELEVATION

Social & Affordable Housing - HAFF Kelmscott
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0 1 2 4m
1:100 @ A3

SECTION A-A

Social & Affordable Housing - HAFF Kelmscott
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Hassell ©

0 1 2 4m
1:100 @ A3

67

SECTION B-B


PARAPET
111.600
ROOF
109.100
L05
105.800
L04
102.600
L03
99.400
L02
96.200
L01
93.000
GF
89.500
2500
3300
3200
3200
3200
3500
22100
SITE BOUNDARY
SITE BOUNDARY
BALCONY
2 BED
WALKWAY
RETAINED DEAD TREE
CAR PARK
DCW PLANT

VISUALISATION

ALBANY HIGHWAY ELEVATION

VISUALISATION

NORTHERN APPROACH ALBANY HIGHWAY

VISUALISATION

STATION PLAZA

VISUALISATION

SOUTHERN APPROACH ALBANY HIGHWAY

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VISUALISATION

SOUTHERN APPROACH PARKLANDS

VISUALISATION

GROUND FLOOR ATRIUM

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Level 2, The Ice Cream Factory
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Certified
B
Corporation

TREE REPORT

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Contact – Scott McConn – Design Manager
Site – Streich Ave - Kelmscott
Prepared by: Jonathan Epps – FRGS IACA
Consulting Arboriculturist
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INSTITUTE OF AUSTRALIAN CONSULTING ARBORICULTURISTS
IACA
ACCREDITED MEMBER™

10 December 2025

INTRODUCTION

Michael Polmear originally requested Jonathan Epps to inspect the mature trees surrounding the cleared area just to the north of the KFC carpark at the corner of Streich Avenue and Albany Highway, Kelmscott. The report is to contain information on the subject trees' structural condition and their general health status. In addition guidance is sought on how best to protect the trees during the site construction process. The NRZ, Notional Root Zone TPZ – Tree Protection Zone – SRZ - Structural Root Zone – setback distances are to be included. A 'risk rating' was assigned to each subject tree. A 'significance in the landscape' value, estimated lifespan and 'tree retention value' was also given – see pages 18 & 19 for detailed explanation.

TREE SURVEY/INSPECTION

The tree survey/inspection took place on Tuesday 9 December 2025. All observations were taken from ground level. The weather was warm, sunny and clear - air temperature was around 27° C. Each subject tree was numbered in situ with an aluminium tag on its stem. A 'mud map' was prepared showing the tree sites – see page 3.

SUBJECT TREES

The subject tree species are as follows:

WA trees

Marri – *Corymbia calophylla*

Eastern States trees

Bottlebrush – *Callistemon viminalis*
Eucalypt – unknown sp
Hill's Weeping Fig – *Ficus microcarpa* var. *hillii*
Snow in Summer – *Melaleuca linarifolia*
Norfolk Is. Hibiscus – *Lagunaria patersonia*

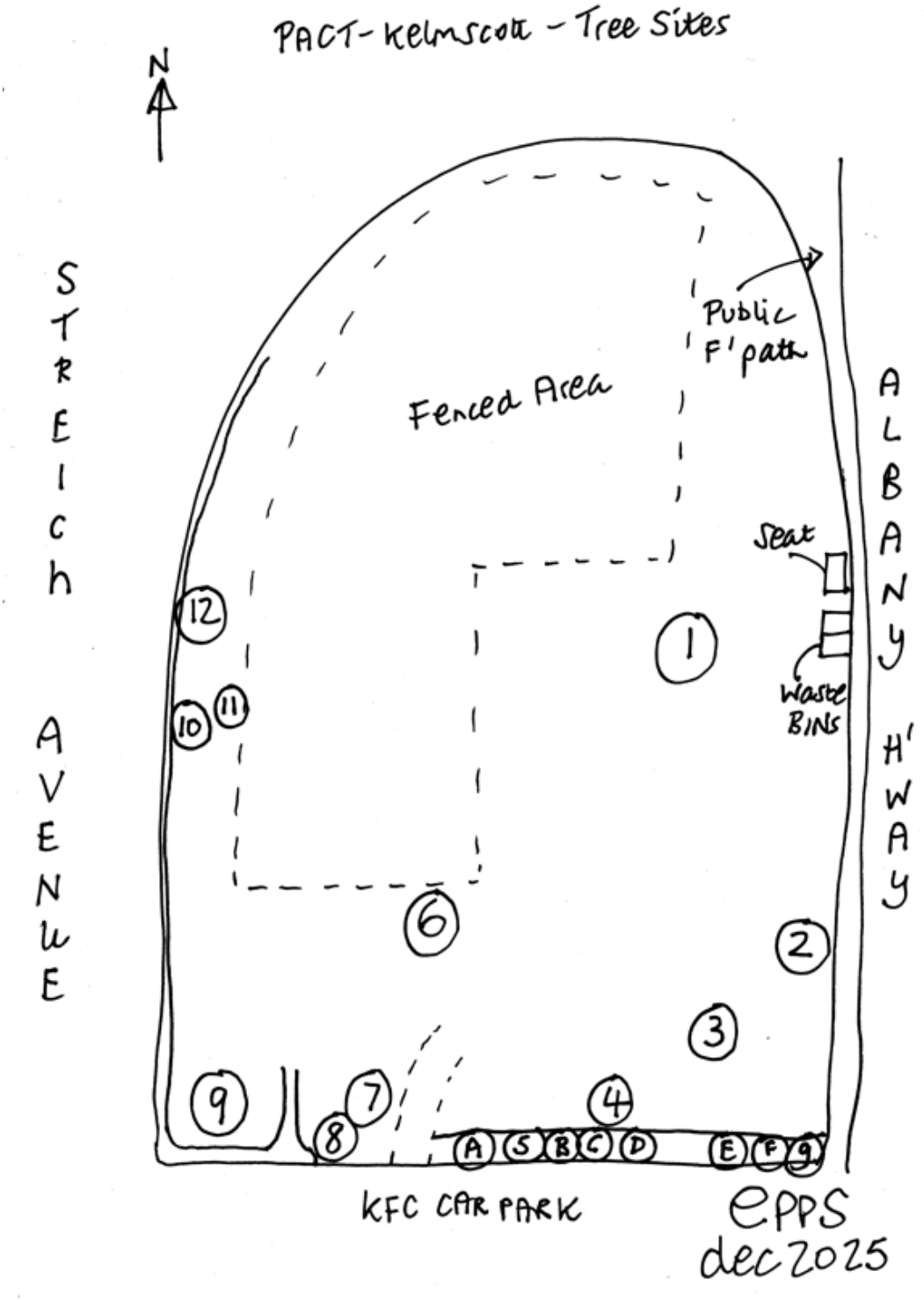
Exotic trees

Chinese Pistachio – *Pistacia chinensis*

METHODOLOGY

The subject trees were inspected from ground level for the following conditions:

Root plate heave and/or disturbance
Exposed roots – lowering of soil level/grade – trip hazard
Infill at base of stems – raised soil levels – collar rot
Girdling roots – roots encircling the stem may cause 'ring barking' – bark necrosis
Basal cavities – hollows, fungal brackets/fruiting bodies
Crown galls
Termite activity
Climbing plants
Proximity of underground/overground services
Proximity of aboveground structures, eg houses, retaining walls, etc
Bark tears, lesions, splits and cracks
Oedema – and other unnatural swollen & cracked areas in bark tissue
Physical abnormalities, eg lightning strikes, bridge grafts, etc
Unnatural change in bark colour, texture and form
Compression folds in bark
Decay pockets in stem
Excessive gum, sap, kino exudation and/or weeping
Borer, cossid moth and other insect activity
Included bark at major stem and branch unions
Evidence of tree surgery and infrastructure, eg cabling, Cobra/Yale Bracing, signs and other abiotic tree attachments
Branch attachments
Evidence of topping, lopping and/or pollarding history
Flush cuts – removal of branch collar
Branch sockets – areas where branches have been torn out and away from union
Branches of uneven taper
Crossing, broken and hung-up branches – branch stubs
Die-back symptoms – stag heading and reduction in foliage density
Major dead wood – over 25mm in diameter
Minor dead wood – under 25mm in diameter
Mycoplasma attack
Foliage – change in lamina colour, size, shape and thickness variation
Epicormic growth
Growth habit of tree – leaning, crooked or asymmetrical growth form


PACT- Kelmscott - Tree Sites
N
STREICH AVENUE
ALBANY H'WAY
Public F'path
Fenced Area
Seat
Waste BINS
1
2
3
4
6
7
8
9
10
11
12
A
S
B
C
D
E
F
G
KFC CAR PARK
epps
dec 2025

TREE INSPECTION DETAILS

Tree No 1 – Bottlebrush

The tree is located on the cleared site on the east boundary close to a public seat on the footpath and two waste bins adjacent to Albany Highway. The small tree has a moderate lean (15°-30° from upright) towards the north. Most of the crown area appears dead. Some live epicormic shoots arise on the low stem and low crown area. There is a large crack in the stem around the area which has had a large branch removed in the past. A tree in terminal decline. A poor specimen.

The tree is around 4.5m tall with a crown spread of 6+m. The DSH – diameter at standard height, usually taken on the stem at 1400mm agl, is 380mm. The diameter taken just above the basal flare is 480mm. The foliage is mostly of normal colour, size but much reduced density. The tree appears to have no major pest or disease issues.

Tree Age – ~20+ years

Tree Risk Factor - Low

Significance in the landscape – Low

Tree Retention Value – Priority for removal - Low

Life expectancy – an additional <2-5? years

Protective setback distances – NRZ/TPZ – 4.8m – SRZ – 2.5m

Proposed works – Remove tree to ground level and grind stump. Replace with new tree elsewhere on site where appropriate.

Tree No 2 – Dead standing Marri

This large dead remnant specimen stands adjacent to the public footpath on Albany Highway. The tree is mostly without bark and main branch structure. There is evidence of old Termite sand trails in vertical cracks on the stem. There is no evidence of live Termites in situ. The remaining tree stem appears sound.

The tree is around 11m tall with no main branch structure. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 860mm. The diameter taken just above the basal flare is 1100mm. The foliage is absent. The tree appears to have no major pest or disease issues except for inactive Termite sand trails on the stem as described above.

Tree Age – ~60+ years

Tree Risk Factor - Low

Significance in the landscape – High

Tree Retention Value – Priority for retention - High

Structural expectancy – 20-40 years

Protective setback distances – NRZ/TPZ – 10.2m – SRZ – 3.4m

Proposed works – Monitor dead tree stem annually.

Tree No 3 – Marri

This is one of the larger live specimens. The tree has a 'sweep form' at its base of stem. (Sweep is a forestry for a substantial curve in the lower stem/trunk near ground level – this could have arisen from growing adjacent to a former very large tree – Tree No 2).

The tree's main stem divides at 1.6m agl. The union here appears sound. Old occluding 'flush cut' wounds were noted on the low stem. Exposed wood appears sound. The 'basal flare' near the base of the tree's stem appears hidden by likely infill.

Tree has had a codominant stem removed at 4.5m agl in the past. A cavity exists at the top of the old wound. The open exposed lesion beneath this wound is 4.5m long and around 900mm at its widest point. The exposed wood in this lesion appears sound. There is evidence of old Termite activity in vertical cracks in this lesion. No active Termites were seen. The crown area has minor dead wood. The tree is a good significant WA specimen.

The tree is around 22+m tall with a crown spread of 12+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 1200mm. The diameter taken just above the basal flare is 1300mm. The foliage is mostly of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~80+ years

Tree Risk Factor - Moderate

Significance in the landscape – High

Tree Retention Value – Priority for retention - High

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 14.4m – SRZ – 3.7m

Proposed works – None

Tree No 4 – Marri

The tree is a large specimen adjacent to Tree No 3. A former codominant stem has been removed at around 3m agl. Re-growth at the edge of the wound appears sound and healthy. Major dead wood exists on the low stem facing Tree No 5. Tree No 4 has a well pronounced 'basal flare'. Bees are active at the base of the tree on the north side. A fully occluded branch removal wound exists on the stem 2.5m agl on the west side. A large first order (main) branch removal wound exists on the stem at around 6.5m agl.

The tree is around 20+m tall with a crown spread of 15+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 1000mm. The diameter taken just above the basal flare is 1400mm. The foliage is mostly of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~80+ years

Tree Risk Factor - Moderate

Significance in the landscape – High

Tree Retention Value – Priority for retention - High

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 12.0m – SRZ – 3.8m

Proposed works – Remove major dead wood

Tree No 5 – Hill's Weeping Fig

Tree sited on a bank behind a cyclone type fence, adjacent to the KFC car park kerb. The main stem sub divides into three 'leaders' at around 1.3m agl. There is a history of pruning of branches on the KFC car park side. A good specimen.

The tree is around 18+m tall with a crown spread of 25+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 950mm. The diameter taken just above the basal flare is 1300mm. The foliage is of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~40+ years

Tree Risk Factor - Low

Significance in the landscape – Medium

Tree Retention Value – Consider for retention - Medium

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 11.4m – SRZ – 3.8m

Proposed works – None

Tree No 6 – Eucalypt

The tree stands alone closer to the fenced off site. The tree has a slight lean – appears sound and healthy. A codominant stem exists at around 5m agl. The union here is partially included but appears sound. The base of the stem has been infilled on the north side. Vertical 'growth cracks' are present on the lower stem. These are a common feature of smooth barked Eucalypts and will occlude fully in time. A good specimen.

The tree is around 20m tall with a crown spread of 15+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 820mm. The diameter taken just above the basal flare is 960mm. The foliage is of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~40+ years

Tree Risk Factor - Moderate

Significance in the landscape – Medium

Tree Retention Value – Consider for retention - Medium

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 9.8m – SRZ – 3.2m

Proposed works – None

Tree No 7 – Marri

The tree is one of a group of same species, similar aged trees growing near the south west corner of the site. The tree has a history of branch removals in the low crown area. The tree has a slight lean towards the north east. Minor dead wood is present in the upper crown area. Some foliage decline was noted in the upper crown area. A good specimen.

The tree is around 16+m tall with a crown spread of 10+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 650mm. The diameter taken just above the basal flare is 780mm. The foliage is of normal colour, size but reduced density in the upper crown. The tree appears to have no major pest or disease issues.

Tree Age – ~25+ years

Tree Risk Factor - Low

Significance in the landscape – High

Tree Retention Value – Priority for retention - High

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 5.4m – SRZ – 2.7m

Proposed works – Treat root plate area with BIOPRIME Trace

Tree No 8 – Marri

The tree stands adjacent to Tree No 7, closer to the kerb with the KFC car park. The tree's stem divides at around 2.5m agl. Two occluding 'flush cut' wounds exist on the low and mid stem. Two, branch 'stubs' exist in the mid and upper crown area. These are the result of poor pruning where the 'final cut' has been made proud of the 'branch collar'. The 'stubs' do have active, healthy callus tissue surrounding them. Minor dead wood is present in the upper crown area. Some foliage decline was noted in the upper crown area. A good specimen.

The tree is around 16+m tall with a crown spread of 12+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 630mm. The diameter taken just above the basal flare is 690mm. The foliage is mostly of normal colour, size but reduced density in the upper crown. The tree appears to have no major pest or disease issues.

Tree Age – ~25+ years

Tree Risk Factor - Low

Significance in the landscape – High

Tree Retention Value – Priority for retention - High

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 7.7m – SRZ – 2.8m

Proposed works – Treat root plate area with BIOPRIME Trace

Tree No 9 – Marri

The tree is sited near the corner with Streich Avenue. The stem divides at 4.5m agl. The tree has a well pronounced 'basal flare'. The tree has a former broken main 'leader' which had apical dominance before structural failure. This aspect has been replaced somewhat by an overlong branch on the west side which may assume apical dominance in time. The tree appears sound. Minor dead wood is present in the upper crown area. Some foliage decline was noted in the upper crown area. A fair specimen.

The tree is around 15+m tall with a crown spread of 15+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 820mm. The diameter taken just above the basal flare is 1100mm. The foliage is mostly of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~30+ years

Tree Risk Factor - Moderate

Significance in the landscape – Medium

Tree Retention Value – Consider for retention - Medium

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 9.8m – SRZ – 3.4m

Proposed works – Treat root plate area with BIOPRIME Trace

Tree No 10 – Pistachio

A small wide spreading tree sited near the verge on the west side of the site, opposite the railway. The tree has a 'low crown development' with many of the lower lateral branches reaching near ground level. Minor dead wood is present on the underside of the low crown area. A good, fairly rare (in Perth) specimen.

The tree is around 5.5+m tall with a crown spread of 12+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 800mm. The diameter taken just above the basal flare is 720mm. The foliage is of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~35+ years

Tree Risk Factor - Low

Significance in the landscape – Medium

Tree Retention Value – Consider for retention - Medium

Life expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 9.6m – SRZ – 2.8m

Proposed works – Remove minor dead wood and prune lower branches for better access.

Tree No 11 – "Snow in Summer'

A small tree adjacent to Tree No 10. Tree No 11 has a severe asymmetrical form over an adjacent site fence. The main stem divides at 900 mm agl. At the point of division is a large crack with a cavity. Some decay is present inside the cavity, although not considered advanced the tree has been structurally compromised and along with its severe asymmetrical form is not considered a tree for the long term, even though the foliage is healthy and full.

The tree is around 3+m tall with a crown spread of 4+m. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 360mm. The diameter taken just above the basal flare is 500mm. The foliage is of normal colour, size and density. The tree appears to have no major pest or disease issues.

Tree Age – ~20+ years

Tree Risk Factor - Moderate

Significance in the landscape – Low

Tree Retention Value – Priority for removal - Low

Life expectancy – an additional 0-10 years???

Protective setback distances – NRZ/TPZ – 4.3m – SRZ – 2.5m

Proposed works – Remove tree and replace with a new tree elsewhere on site where appropriate

Tree No 12 – Dead standing Marri

A large dead standing tree stem without its branch structure. It is a significant remnant tree. There is no bark on the stem. Large vertical fissures are present on the low stem many with old Termite activity with sand tracks. No active Termites noted. The tree appears to remain sound.

The tree is around 9+m tall with no main branch structure. The DSH – diameter at breast height, usually taken on the stem at 1400mm agl, is 1300mm. The diameter taken just above the basal flare is 1600mm. The foliage is absent. The tree appears to have no major pest or disease issues.

Tree Age – ~80+ years

Tree Risk Factor - Low

Significance in the landscape – High

Tree Retention Value – Priority for retention - High

Structural expectancy – an additional 15-40+ years

Protective setback distances – NRZ/TPZ – 15.6m – SRZ – 4.0m

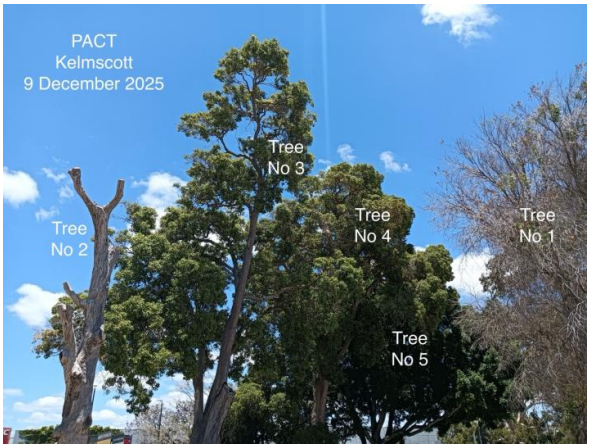
Proposed works – Monitor dead tree stem annually.

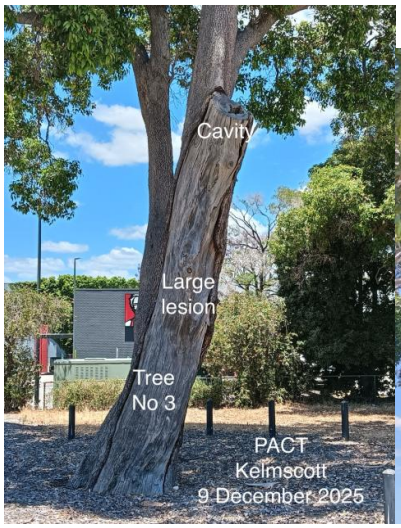
Linear row of small trees and shrubs including Tree No 5 (see above for details)

This site description omits Tree No 5 which is included above in the main Tree Inspection details.

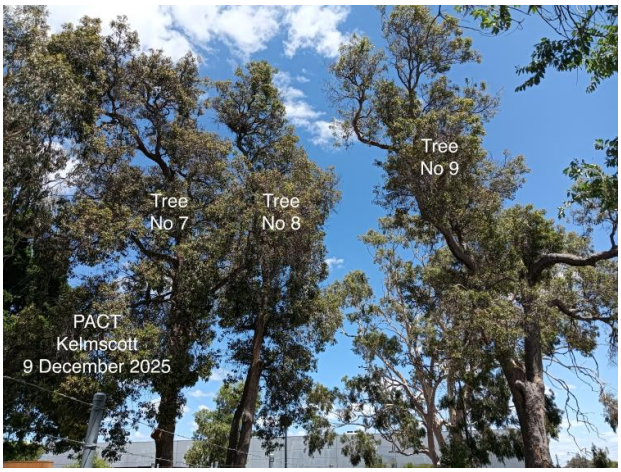
A – Variegated Oleander shrub – remove as poisonous – Priority for removal
B – Small insignificant shrub – consider for removal
C – Norfolk Island Hibiscus – *Lagunaria patersonia* – small poorly pruned shrubby tree - Priority for removal
D – Variegated insignificant shrub - consider for removal
E - Norfolk Island Hibiscus – A good example with good form – appears sound and healthy –
consider for retention
F & G – Bottlebrush x 2 – Both small poorly pruned specimens with failing health - Priority for removal x 2

Subject Tree Images






Tree
No 5
PACT
Kelmscott
9 December 2025
Tree
No 6
Tree
No 5
PACT
Kelmscott
9 December 2025


Tree
No 9
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Kelmscott
9 December 2025


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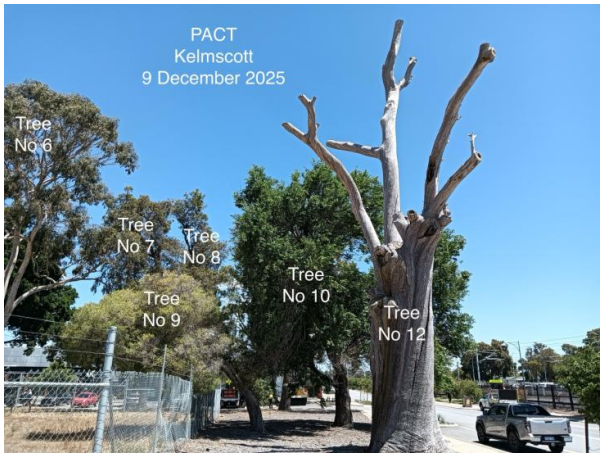
Kelmscott
9 December 2025



A NOTE ON TREE RISK ASSESSMENT

The tree risk rating has been based on the ISA – International Society of Arboriculture – TRAQ – Tree Risk Assessment Qualification method – 2019. The grades or levels of risk using this method are – Low – Moderate – High – Extreme. The method used is a qualitative one that considers not only the tree's structure but, its surrounds. The elements surrounding the trees are referred to as 'targets'. These 'targets' may be structural and therefore stationary, such as buildings, or mobile such as cars or pedestrians. 'Tree Risk' evaluation is a method of determining which subject trees are likely to fail and damage these potential 'targets'. The final risk rating evaluation matrix determines the consequences of failure. 'Occupancy rates' are also an important factor in the 'risk rating' determination. The school will know how often the areas beneath the subject trees are occupied and can evaluate this input.

TRAQ refers to the likelihood of sudden limb and/or whole stem failure. This is from a ground-based inspection only. Where a tree may appear to have a possible defect at height following a ground based inspection then the inspector will request an aerial inspection. This is usually from an aerial platform if the area is accessible. If not then a climbing tree surgeon/arborist is hired to carry out the inspection under the guidance of Mr Epps. Trees do and can however drop limbs suddenly without warning. This condition is known as 'Sudden branch drop' –

The failure and collapse of live, usually horizontal branches, seemingly without any noticeable cause in calm hot, dry weather conditions generally after rain. Theorised to be caused by altered moisture content in the branch disturbing the longitudinal prestressing of the wood that normally helps support the load as formed by reaction wood in branches tending to horizontal (Lonsdale 1999, p. 30), or incipient failure from the lengthening of existing internal cracks as the wood cools (Shigo 1986, p. 248), or influenced by branch creep under its own weight and by wind (Mattheck & Breloer 1994, p. 126), or fractures to vascular rays if pulled at right angles to their longitudinal orientation forming from subsidence cracks (Mattheck & Breloer 1994, p. 169), or a combination of these factors. Such branch breakages usually occur at some distance from the branch collar leaving a stub.

Dictionary for Managing Trees in Urban Environments – Draper & Richards – 2009 – p. 149

The risk of tree failure causing serious injury or death is rare – see paper – 'Tree Risk Assessment – Arborist News – 2011 – Smiley, Mathena & Lilly.

All trees carry a certain amount of risk, which must be determined by the arboriculturist contracted by the tree owner or their agent.

TREE PROTECTION ON DEVELOPMENT SITES

In 2009 Australian Standard - AS 4970 – 2009 Protection of Trees on Development Sites was released to give advice to those professionals concerned with retaining mature trees on development sites. This document provides guidelines on how close proposed structures both above and below ground can be placed without causing structural damage and possible long term health issues to the tree.

In May 2025 the document was revised and is known now as AS 4970:2025 Protection of Trees on Development Sites.

Some of the terminology has been changed such as:

DBH – Diameter at Breast Height – DBH is now known as Diameter at Standard Height (DSH) which remains at 1400mm (1.4m) agl – above ground level.

The two previously mentioned 'setback protection distances' (TPZ – Tree Protection Zone which is 12 x DSH) and (SRZ – Structural Root Zone) which are arrived at using the DSH measurements are now known as three protective distances as follows:

NRZ – Notional Root Zone – which is effectively the 'old TPZ' measurement which is 12 x DSH, which helps to protect both the tree's canopy (branch structure) and overall root system.

Just to confuse the issue the TPZ is now known as an adjustable area that is managed by the site arborist (arboriculturist) to protect unusual root spreads and all other protectable symptoms - this will now include 'Compensatory areas' to offset the intrusions - should there be any. For example, if a building or any other in ground structure is now within the NRZ by up to 20% (formerly 10% in the old document) then adjustments to the old rigid TPZ outline can now be adjusted to help protect more roots and possibly crown structures.

SRZ – Structural Root Zone – this measurement remains the same. It is calculated by taking the diameter of the main stem/trunk above the basal flare (the swollen area normally at the base of a tree's stem (unless it has been infilled!) from where lateral/structural roots arise from – important roots that hold the tree vertically aligned, under normal growth conditions. It is important that absolutely no ground intrusion take place vertically downwards into the soil profile within the SRZ unless under the guidance of an arboriculturist.

The SRZ distance usually is at a distance from the main stem where the main lateral roots begin their 'zone of rapid taper', ie that point on the main lateral roots where the diameter diminishes rapidly - *Dictionary for Managing Trees in Urban Environments – Draper & Richards 2009 pp 178.* The SRZ should protect the structural/main lateral roots from severance which may cause disturbance to the structural integrity of the tree. The main lateral/structural roots arise at the base of the stem (aka root crown) and travel outwards a certain distance depending on the age and species of tree.

By calculating the **SRZ distance** the arboriculturist has some guidance on how far ground intrusion can occur. (This is calculated using the following formula $\mathbf{(\mathit{D} \times 50)^{0.42} \times 0.64}$ where *D* is the diameter of the stem taken just above the basal flare.) Arising from these lateral roots are other roots called 'sinkers' or 'droppers'. This type of root travels vertically from the lateral root down into the soil profile. These lateral and sinker roots are responsible for keeping the tree upright. This activity is generally confined to the SRZ, however most tree roots are asymmetrical in form and location and may in fact be located in greater numbers and varying widths in different areas.

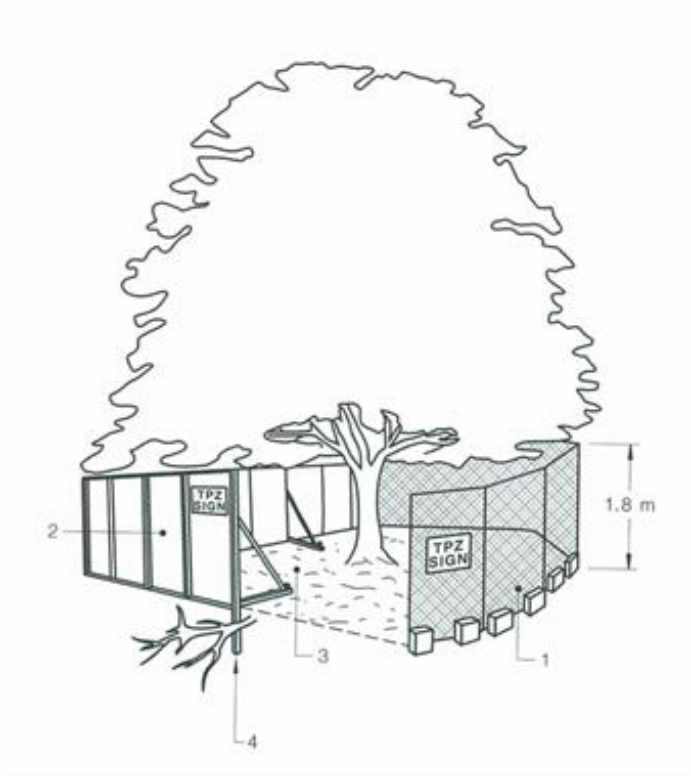
The roots beyond the SRZ are not generally considered structural, but are responsible for the uptake of water and nutrients. Young trees, species dependant, may tolerate root disturbance as they are more vigorous and able to reproduce root systems more readily. Older more established trees, especially those with a health issue, may not tolerate root severance and may become structurally unsound. Their health may decline at a later date; sometimes many years following the event. It is important under normal site conditions that the TPZ is free from vertical intrusion and compaction, which together may affect the long-term health of the tree.

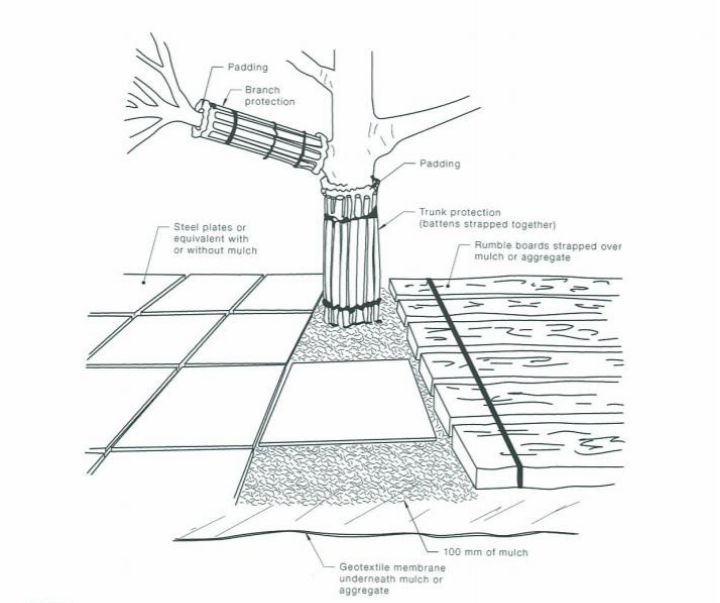
Physical tree protection of those trees to be retained is mentioned on page 19 of AS 4970 – 2009 – Protection of Trees on Development Sites. This document recommends erecting a heavy-duty fence made out of scaffold poles and planks. In the Perth metropolitan area most TPZ's are protected by four wire mesh temporary fence panels.

An example of tree protection fencing, from AS 4970 Protection of trees on development sites:

LEGEND:

1 Welded mesh panels (or Plywood panels) with signage and shade cloth attached (if required) stabliised in place with concrete feet.
2 Mulch across surface of protected area.
3 Non ground penetrating bracing can be installed within protected area.





NOTES:

1 For trunk and branch protection use boards and padding that will prevent damage to bark. Boards are to be strapped to trees, not nailed or screwed.

2 Rumble boards should be of a suitable thickness to prevent soil compaction and root damage.

FIGURE 4 EXAMPLES OF TRUNK, BRANCH AND GROUND PROTECTION

Other Tree protection measures to consider

It is essential to protect the NRZ/TPZ areas and the following activities must not be carried out within the TPZ:

- No mixing of building materials, such as concrete
- No storage or travel of heavy plant/trucks
- Absolutely no ground intrusion into the soil profile – unless directed by site arborist
- No storage of ANY heavy materials such as concrete blocks
- Storage of lighter material in containers on blocks is permissible for the short term

RECOMMENDATIONS

- The site arborist should visit the site at pre-arranged intervals throughout the project to help with the tree protection process
- It is recommended that any proposed tree works take place before ground works begin
- Tree protection fences and signage must not be altered or moved during the construction process
- Recommended tree works are noted in the in the detailed tree inspection notes above

Proposed tree works to be carried out before ground works begin.

- Tree No 1 – Fell and grind stump
- Tree No 2 – Retain and monitor structure annually
- Tree No 3 – None
- Tree No 4 – Remove major dead wood
- Tree No 5 – None
- Tree No 6 – None
- Tree Nos 7,8,9 – Treat root plate areas with BIOPRIME Trace

CONCLUSIONS

Although dead both Tree Nos 2 & 12 are likely to be remnant trees and as both appear to be sound, they should be retained.

The large Marri Trees Nos 3 & 4 are also significant trees and every effort must be made to retain them.

Tree Nos 7-9 are also Marri trees and although not quite as good in health as Tree Nos 3 & 4 every effort must be made to retain them by treating them with a soil conditioner such as BIOPRIME Trace which is a locally made product in Forrestdale by Bioscience; phone 0410582778 for details of application and costs.

Protection of the roots of the dead trees is important as their roots cannot regenerate. There fore where possible maintain the TPZ 7 SRZ setback zones. If in doubt seek arboricultural advice.

There are no subject trees that have a HIGH or EXTREME 'risk rating'.

The subject trees have been rated as follows:

- Priority for retention

Tree Nos 2,3,4,7,8,12

- Consider for retention
  Tree Nos 5,6,9,10, E
- Consider for removal
  B, D
- Priority for removal
  1,11, A, C, F, G

Jonathan Epps FRGS IACA
Consulting Arboriculturist
Diploma in Arboriculture UK 1986
IACA Accredited Member – ACM0172003
Qualified Professional Tree Inspector UK 2008
Qualified Tree Risk Assessor ISA
NTWA Significant Tree Committee member 2019
Cert Noongar Language & Culture – Curtin 2021

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DISCLAIMER STATEMENT

IACA Significance of a Tree, Assessment Rating System (STARS)© (IACA 2010)©

In the development of this document IACA acknowledges the contribution and original concept of the Footprint Green Tree Significance & Retention Value Matrix, developed by Footprint Green Pty Ltd in June 2001.

The landscape significance of a tree is an essential criterion to establish the importance that a particular tree may have on a site. However, rating the significance of a tree becomes subjective and difficult to ascertain in a consistent and repetitive fashion due to assessor bias. It is therefore necessary to have a rating system utilising structured qualitative criteria to assist in determining the retention value for a tree. To assist this process all definitions for terms used in the *Tree Significance - Assessment Criteria* and *Tree Retention Value - Priority Matrix*, are taken from the IACA Dictionary for Managing Trees in Urban Environments 2009.

This rating system will assist in the planning processes for proposed works, above and below ground where trees are to be retained on or adjacent a development site. The system uses a scale of *High*, *Medium* and *Low* significance in the landscape. Once the landscape significance of an individual tree has been defined, the retention value can be determined. An example of its use in an Arboricultural report is shown as Appendix A.

Tree Significance - Assessment Criteria

1. High Significance in landscape

- The tree is in good condition and good vigour;
- The tree has a form typical for the species;
- The tree is a remnant or is a planted locally indigenous specimen and/or is rare or uncommon in the local area or of botanical interest or of substantial age;
- The tree is listed as a Heritage Item, Threatened Species or part of an Endangered ecological community or listed on Councils significant Tree Register;
- The tree is visually prominent and visible from a considerable distance when viewed from most directions within the landscape due to its size and scale and makes a positive contribution to the local amenity;
- The tree supports social and cultural sentiments or spiritual associations, reflected by the broader population or community group or has commemorative values;
- The tree's growth is unrestricted by above and below ground influences, supporting its ability to reach dimensions typical for the taxa *in situ* - tree is appropriate to the site conditions.

2. Medium Significance in landscape

- The tree is in fair-good condition and good or low vigour;
- The tree has form typical or atypical of the species;
- The tree is a planted locally indigenous or a common species with its taxa commonly planted in the local area
- The tree is visible from surrounding properties, although not visually prominent as partially obstructed by other vegetation or buildings when viewed from the street,
- The tree provides a fair contribution to the visual character and amenity of the local area,
- The tree's growth is moderately restricted by above or below ground influences, reducing its ability to reach dimensions typical for the taxa *in situ*.

3. Low Significance in landscape

- The tree is in fair-poor condition and good or low vigour;
- The tree has form atypical of the species;
- The tree is not visible or is partly visible from surrounding properties as obstructed by other vegetation or buildings,
- The tree provides a minor contribution or has a negative impact on the visual character and amenity of the local area,
- The tree is a young specimen which may or may not have reached dimension to be protected by local Tree Preservation orders or similar protection mechanisms and can easily be replaced with a suitable specimen,
- The tree's growth is severely restricted by above or below ground influences, unlikely to reach dimensions typical for the taxa *in situ* - tree is inappropriate to the site conditions,
- The tree is listed as exempt under the provisions of the local Council Tree Preservation Order or similar protection mechanisms,
- The tree has a wound or defect that has potential to become structurally unsound.

Environmental Pest / Noxious Weed Species

- The tree is an Environmental Pest Species due to its invasiveness or poisonous/ allergenic properties,
- The tree is a declared noxious weed by legislation.

Hazardous/Irreversible Decline

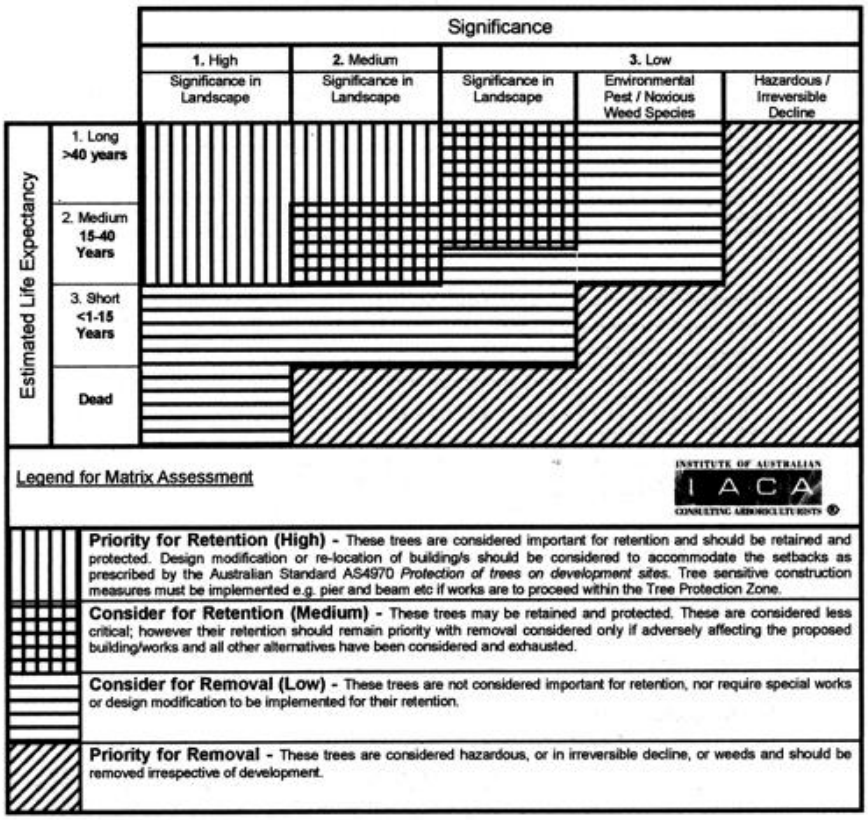
- The tree is structurally unsound and/or unstable and is considered potentially dangerous,
- The tree is dead, or is in irreversible decline, or has the potential to fail or collapse in full or part in the immediate to short term.

The tree is to have a minimum of three (3) criteria in a category to be classified in that group.

Note: The assessment criteria are for individual trees only, however, can be applied to a monocultural stand in its entirety e.g. hedge.

IACA 2010, *IACA Significance of a Tree, Assessment Rating System (STARS)*, Institute of Australian Consulting Arboriculturists, www.iaca.org.au

Table 1.0 Tree Retention Value - Priority Matrix.



USE OF THIS DOCUMENT AND REFERENCING

The IACA Significance of a Tree, Assessment Rating System (STARS) is free to use, but only in its entirety and must be cited as follows:

IACA, 2010, *IACA Significance of a Tree, Assessment Rating System (STARS)*, Institute of Australian Consulting Arboriculturists, Australia, www.iaca.org.au

REFERENCES

Australia ICOMOS Inc. 1999, *The Burra Charter – The Australian ICOMOS Charter for Places of Cultural Significance*, International Council of Monuments and Sites, www.icomos.org/australia

Draper BD and Richards PA 2009, *Dictionary for Managing Trees in Urban Environments*, Institute of Australian Consulting Arboriculturists (IACA), CSIRO Publishing, Collingwood, Victoria, Australia.

Footprint Green Pty Ltd 2001, *Footprint Green Tree Significance & Retention Value Matrix*, Avalon, NSW Australia, www.footprintgreen.com.au

IACA 2010, *IACA Significance of a Tree, Assessment Rating System (STARS)*, Institute of Australian Consulting Arboriculturists, www.iaca.org.au

Glossary

Included bark

At the apex of a branch union the bark in this area has become trapped. This entrapment causes the tissues at this point not to be connected. Structural failure may occur if the union is weak and/or excessive increasing end weight of branches causes sudden collapse. Also known as a 'compression joint'

Lopped - Lopping

Branches that have been cut between the 'internodes' that, are points where new branches arise along a branch length. Such cuts may produce multiple shoots from the cut surface, which may be weakly attached

Topping

Removal of the upper part of a tree, reducing its height by 'lopping'……..

Final cut wound

When a branch is removed completely from its companion the wound left is known as the 'final cut wound'

Fully occluded wound

The tissue surrounding a recently cut branch wound produced vigrous strong callus tissue which will eventually cover the wound completely. This is a sign of a healthy, vigrous tree

Natural Target Pruning

The is where the final cut is made outside of the branch collar and bark branch ridge – see AS 4373 – Pruning of Amenity Trees – 2007 – p11 at the end of this report

Leaders

A structural or main branch that asserts apical dominance

Callus Tissue/Wood

Undifferentiated and un-lignified wood that forms initially after wounding around the margins of a wound separating damaged existing wood from the later forming lignified wood or wound wood

Branch Bark Ridge

Extruded bark forming a convex protrusion or striation or series of ripples in the crotch of the branch union

Branch Collar

The swollen ring of growth formed around the base of a branch by the successive layers of each growth increment of the branch and the supporting branch or trunk to which it is connected growing and intertwining around its edges (Shigo 2004, p.5).

Branch Union

The point where the branch intersects with a larger structure such as the stem or another branch

Branch Stub

UK expression – where the 'final cut' during a branch removal leaves a proud foreshortened branch stump or stub

Root/Basal Flare

Swelling at the 'root crown' usually uniform around the base of the trunk involving tissue from the trunk and root crown

Root Crown

Lateral roots arising from the base of the trunk. The area at the base of the stem where the main roots arise

Crown Lifting

Complete removal of lower main branches, often carried out to avoid obstructions

Growth Cracks

Longitudinal split that may develop as a rupture in the bark from normal growth

Sapwood

The living cells in the outer, usually light coloured, water and nutrient conducting wood forming region of secondary xylem

Heartwood

The central section of a branch or trunk usually darker coloured than sapwood, comprised of lignin blocked secondary xylem sapwood cells that are no longer conductive but provide a structural and protective function from substances that form or are deposited as part of the aging process as each cell dies (Shigo 1986, p 54)

Sub Leader

Usually, a co-dominant stem that has a smaller diameter than the main stem

Structural Branches

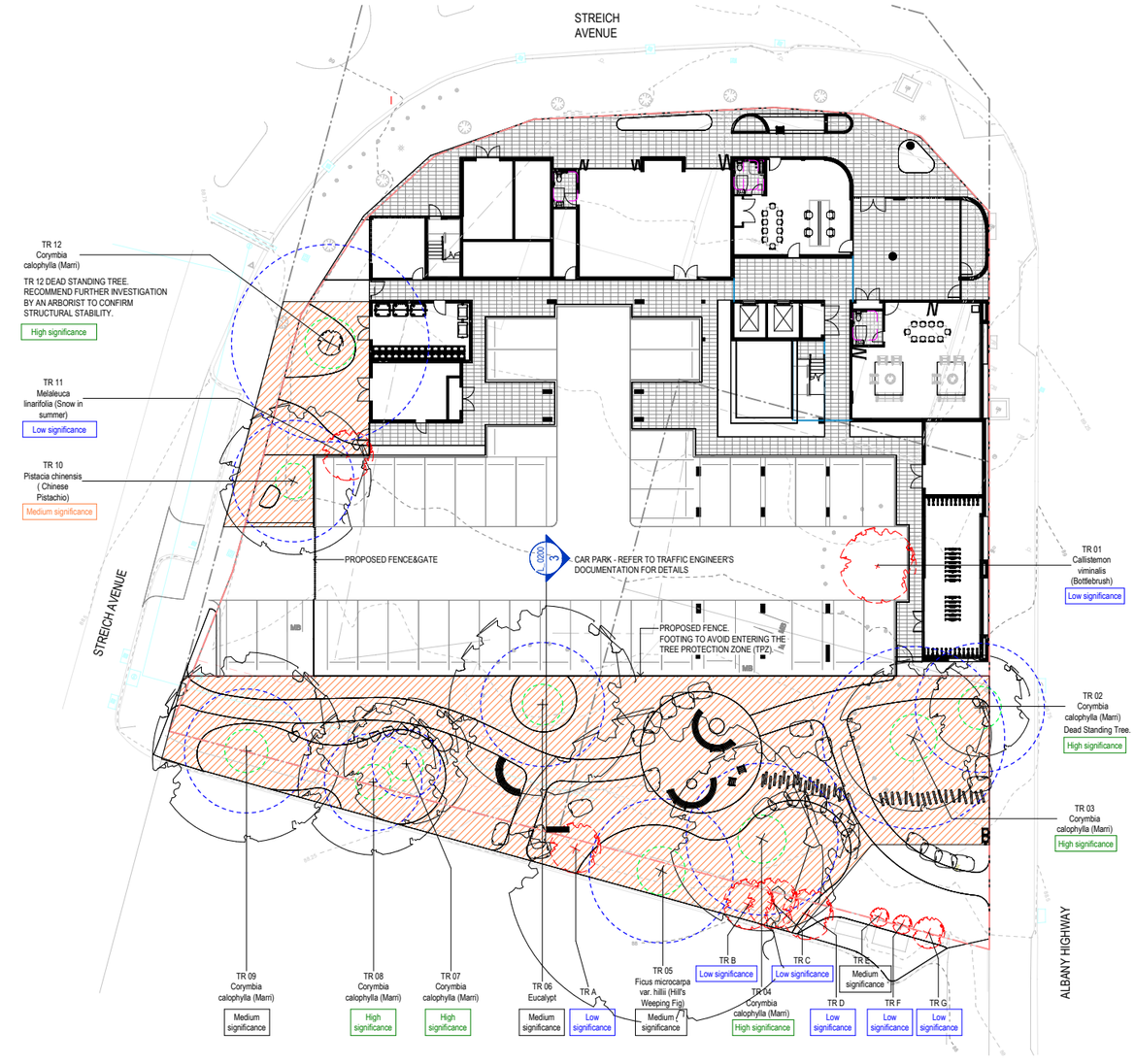
Main or first order branches elongated to form a permanent framework of branches supporting the crown, persisting beyond the tree's maturity

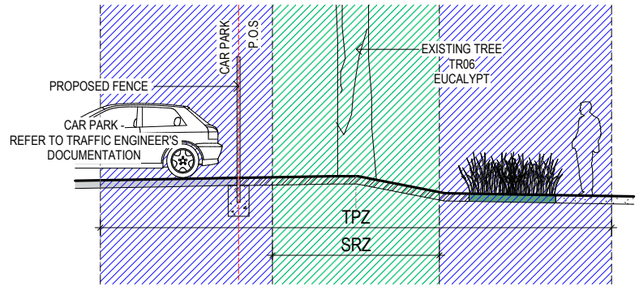
Clear Fall Zone

No structure existing beneath the branch system of the tree that may arrest a sudden branch failure

Sweep – Lower stem of mature trees are bowed sometimes due to competition with adjacent trees or other physical factors

Flush Cut – The final cut of a branch near the stem where the 'branch collar' has been removed – this may lead to premature decay and therefore possible structural weakness at a later date.



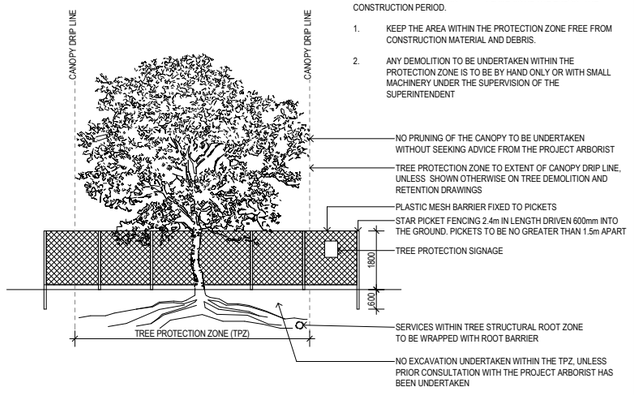


3 L_0100 CAR PARK&P.O.S INTERFACE - TYPICAL
1 : 50

TREE RETENTION AND DEMOLITION SCHEDULE						
Tree ID	Botanical Name	Common Name	Arborist Comments	Significance in the Landscape	Tree Retention Value	Action
TR 01	Callistemon viminalis	Bottlebrush	Remove tree and replace with a new tree elsewhere on site where appropriate	Low	Priority for removal	To be removed
TR 02	Corymbia calophylla	Marri	Retain and monitor structure annually	High	Priority for retention	To be retained and protected
TR 03	Corymbia calophylla	Marri	None	High	Priority for retention	To be retained and protected
TR 04	Corymbia calophylla	Marri	Remove major dead wood	High	Priority for retention	To be retained and protected
TR 05	Ficus microcarpa var. hillii	Hill's Weeping Fig	None	Medium	Consider for retention	To be retained and protected
TR 06	Unknown sp	Eucalypt	None	Medium	Consider for retention	To be retained and protected
TR 07	Corymbia calophylla	Marri	Treat root plate areas with BIOPRIME Trace	High	Priority for retention	To be retained and protected
TR 08	Corymbia calophylla	Marri	Treat root plate areas with BIOPRIME Trace	High	Priority for retention	To be retained and protected
TR 09	Corymbia calophylla	Marri	Treat root plate areas with BIOPRIME Trace	Medium	Consider for retention	To be retained and protected
TR 10	Pistacia chinensis	Chinese Pistachio	Remove minor dead wood and prune lower branches for better access.	Medium	Consider for retention	To be retained and protected
TR 11	Melaleuca linarifolia	Snow in summer	Remove tree and replace with a new tree elsewhere on site where appropriate	Low	Priority for removal	To be removed
TR 12	Corymbia calophylla	Marri	Retain and monitor structure annually	High	Priority for retention	To be retained and protected
TR A	Variegated Oleander Shrub		Remove as poisonous	Low	Priority for removal	To be removed
TR B	Small insignificant shurb			Low	Consider for removal	To be removed
TR C	Lagunaria patersonia	Norfolk Island Hibiscus	Small poorly pruned shrubby tree	Low	Priority for removal	To be removed
TR D	Variegated insignificant shurb			Low	Consider for removal	To be removed
TR E	Lagunaria patersonia	Norfolk Island Hibiscus	Appears sound and healthy	Medium	Consider for retention	To be removed
TR F	Callistemon viminalis	Bottlebrush	Poorly prunned specimens with failling health	Low	Priority for removal	To be removed
TR G	Callistemon viminalis	Bottlebrush	Poorly prunned specimens with failling health	Low	Priority for removal	To be removed

NOTES

1. REFER TO ARBORICULTURAL REPORT FOR ALL EXISTING TREES REQUIREMENTS, RECOMMENDATIONS AND SURROUNDING WORKS.
2. PROVIDE TEMPORARY PROTECTIVE TREE BARRIERS TO EXTENT OF TPZ AS INDICATED ON TREE DEMOLITION AND RETENTION DRAWINGS. THE TREE PROTECTION ZONE IS TO BE BOTH ABOVE AND BELOW THE GROUND. TEMPORARY PROTECTIVE ENCLOSURES TO REMAIN IN PLACE UNTIL THE END OF THE CONSTRUCTION PERIOD.
   1. KEEP THE AREA WITHIN THE PROTECTION ZONE FREE FROM CONSTRUCTION MATERIAL AND DEBRIS.
   2. ANY DEMOLITION TO BE UNDERTAKEN WITHIN THE PROTECTION ZONE IS TO BE BY HAND ONLY OR WITH SMALL MACHINERY UNDER THE SUPERVISION OF THE SUPERINTENDENT



2 TYPICAL TPZ FENCE DURING CONSTRUCTION
1 : 80

LEGEND

- EXISTING TREE - TO BE RETAINED
- TREE CANOPY
- (TPZ) TREE PROTECTION ZONE
- (SRZ) STRUCTURAL ROOT ZONE (SRZ)
- EXISTING TREE - TO BE REMOVED
- TREE PROTECT ZONE REFER TREE PROTECTION FENCE DURING CONSTRUCTION
- EXTENT OF PROPERTY BOUNDARY

TREE SIGNIFICANCE IN LANDSCAPE

- HIGH SIGNIFICANCE
- MIDIUM SIGNIFICANCE
- LOW SIGNIFICANCE

EXCAVATION FOR SERVICES, MAIN LINES & PIPES:

IRRIGATION MAIN LINES, PIPES AND SPRINKLERS ARE TO BE HAND DUG WITHIN TPZ RADIUS OF TREES.

IF SERVICES, PIPES, STORM WATER PITS AND COMMS ARE TO BE REMOVED OR INSTALLED, ENSURE THAT THE TREE ROOTS ARE PROTECTED. UNDER BORING TO BE UTILISED WITHIN THE TPZ RADIUS.

REFER TO AS 4970 - 2009 PROTECTION OF TREES ON DEVELOPMENT SITES.

CONTRACTOR IS RESPONSIBLE FOR PROTECTION AND MAINTENANCE OF TREE DURING THE CONSTRUCTION PERIOD.

ENSURE SUPPLEMENTARY WATERING OVER SUMMER PERIOD AS REQUIRED

REFER TO SPECIFICATION APPENDIX 5 - ARBORICULTURAL TREE REPORT FOR SPECIFIC REQUIREMENTS REGARDING TREE PROTECTION

REFERENCE MAP **NORTH**

1:200
0m 4m 8m 12m 16m

NOTES

1. Do not scale drawing. Written dimensions govern
2. All dimensions are in millimeters unless noted otherwise
3. All dimensions shall be verified on site before proceeding with the work. Hassell shall be notified in writing of any discrepancies.
4. This drawing must be read in conjunction with all relevant contracts, specifications and drawings

This drawing is an uncontrolled copy. Unless noted otherwise

REV	DESCRIPTION	DATE
A	ISSUED FOR INFORMATION	15.01.2026

CONSULTANT

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Glenn Scott 6842
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CLIENT
ENTER HERE

PROJECT
Kelmscott - HAFF Social & Affordable BTR
ENTER ADDRESS HERE

STATUS

DRAWING TITLE
EXISTING TREE MANAGEMENT

REVIEWED Checker
SCALE @ A1 As indicated
APPROVED Approver
PROJECT NO. 018033
DRAWING NO. L_0200
REV NO. A

SIXTY-FIVE (65) MULTIPLE DWELLINGS AND PUBLIC OPEN SPACE

Attachment Links for DevelopmentWA Public Comment – Public Comment close on 21 February 2026 –*(https://developmentwa.com.au/planning-and-approvals/past-planning-items/six-storey-multiple-dwelling-development-at-lots-818-1092-and-1751-albany-highway-kelmscott)*

1. DevelopmentWA - Public Comment
2. Development Application Report
3. Sustainability Report
4. Transport Impact Statement
5. Acoustic Report
6. Waste Management Plan

GOVERNMENT OF WESTERN AUSTRALIA

DevelopmentWA

DESIGN REVIEW ADVICE NOTE

Desktop Review of Pre-lodgement Plans	
Subject	Kelmscott HAFF Project – Proposed Lot 509 Streich Avenue, Kemscott. Six Storey Social and Affordable Housing Development (65 dwellings)
Architect / Proponent	Hassell
Date	10 November 2025 (comments received via email)
Documentation	The following document has been reviewed during the development of this advice: *1. 018033_RP_251031_Kelmscott-DRP.pdf (dated October 2025)*
Declarations	
None	
Design Review Advice endorsement	
Signature	David Karotkin.
	David Karotkin, Design Review Panel Member

Summary

This advice relates to a Desktop Review of the October 2025 design of the proposed 6 Storey Social and Affordable Housing Development, which is an evolution of an earlier August 2024 "Rapid Concept Phase" scheme. Background information dated June 2024 (feasibility study), July 2024, and August 2024 was also reviewed.

The current proposal improves its aspect to the streets including an articulated NE corner element containing the main entry and flanked by communal spaces that activate the streetscape and enhance passive surveillance. This is a significant improvement on the earlier proposals. Response to context and character, and aesthetics are improved though material choices, approach to bulk and scale, and deep-set balconies and reveals. Overall, a significant improvement on previous schemes.

Opportunities remain to improve the scheme with added landscape where possible (especially in the open car park), integration of public art, finalisation of materials and colour selections, and further development of solar shading devices.

Design Quality Evaluation

Principle 1: Context and character *Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.*

1. The planning solution provides a better response to the northeast corner, creating a more appropriate interface with the neighbouring activity centre.
2. The inclusion of deep reveals offers a strong environmental response, with the resulting shadows evoking the deep shading of veranda-wrapped buildings that once characterised the eastern metropolitan (semi-rural) region, even though this style is not prominent in the immediate area today.

Principle 2: Landscape quality *Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.*

1. The retention of trees to the south represents a positive outcome, and the creation of a pocket park is a generous and valuable contribution to the community.
2. The increased transparency of the secure car park is an improvement over the previously more concealed parking area.
3. Opportunities should be explored to introduce landscaping into the open car park to extend the canopy coverage and soften the transition between hard and soft landscape zones.

Principle 3: Built form and scale *Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.* 1. The proposed building height is supported. 2. The articulated northeast corner element with increased height is supported and represents a significant improvement on earlier proposals. 3. The addition of window awnings is an improvement on previous designs. Tailoring the awning designs to respond to different orientations would further improve solar performance and enhance visual interest.
Principle 4: Functionality and build quality *Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle.* 1. The apartment layouts are efficient and well-considered. 2. Locating store rooms adjacent to each apartment is supported. 3. Circulation to access the Ground Floor communal spaces has been resolved. 4. The car park layout is simple and well-organised. 5. The centralised location of the air-conditioning plant is supported. 6. One apartment entry door is located directly opposite a lift door, and it is recommended that this arrangement be reviewed for potential amendment. 7. The use of robust materials, particularly at ground level, is supported.
Principle 5: Sustainability *Good design optimises the sustainability of the built environment, delivering positive, environmental, social and economic outcomes.* 1. The overall building orientation is supported. 2. The abundance of corner apartments allows for effective natural ventilation. 3. There may be opportunities for some north-facing apartments to achieve cross-ventilation through the open-air circulation zone, provided that privacy is maintained. 4. The provision of motorcycle and bicycle parking areas is a positive feature.
Principle 6: Amenity *Good design provides successful places that offer a variety of uses and activities while optimising internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable productive and healthy.* 1. The well-sized recessed balconies provide good privacy and protected outdoor amenity for residents.
Principle 7: Legibility *Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.* 1. The corner entry, highlighted by a change in scale and materiality, successfully establishes a clear and legible main entry point. 2. The internal circulation is simple and intuitive.
Principle 8: Safety *Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.* 1. Passive surveillance throughout the site is supported. 2. The introduction of a garrison-style fence between the car park and the communal open space to the south will improve visibility and enhance safety in both areas.
Principle 9: Community *Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.* 1. The well-positioned and thoughtfully designed ground floor communal spaces promote resident interaction and contribute to a sense of community.

Principle 10: Aesthetics *Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.*

1. The revised approach to building massing has achieved a more visually interesting and balanced aesthetic outcome.
2. The restrained material and colour palette, combined with the articulated northeast corner, is supported.
3. Further refinement of the solar shade design to respond more specifically to orientation could enhance both functionality and visual appeal.
4. Opportunities should be explored to integrate public art within the design.

Kelmscott HAFF Project – Government Architect Design Review Advice Note & Hassell Responses
Proposed Lot 509 Streich Avenue, Kemscott

SUMMARY	**This advice relates to a Desktop Review of the October 2025 design of the proposed 6 Storey Social and Affordable Housing Development, which is an evolution of an earlier August 2024 "Rapid Concept Phase" scheme. Background information dated June 2024 (feasibility study), July 2024, and August 2024 was also reviewed.** **The current proposal improves its aspect to the streets including an articulated NE corner element containing the main entry and flanked by communal spaces that activate the streetscape and enhance passive surveillance. This is a significant improvement on the earlier proposals. Response to context and character, and aesthetics are improved though material choices, approach to bulk and scale, and deep-set balconies and reveals. Overall, a significant improvement on previous schemes. Opportunities remain to improve the scheme with added landscape where possible (especially in the open car park), integration of public art, finalisation of materials and colour selections, and further development of solar shading devices.**
PRINCIPLE 1: CONTEXT AND CHARACTER	**Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.** 1. The planning solution provides a better response to the northeast corner, creating a more appropriate interface with the neighbouring activity centre. 2. The inclusion of deep reveals offers a strong environmental response, with the resulting shadows evoking the deep shading of veranda-wrapped buildings that once characterised the eastern metropolitan (semi-rural) region, even though this style is not prominent in the immediate area today.
PRINCIPLE 1: Hassell Response	Supporting comments noted.
PRINCIPLE 2: LANDSCAPE QUALITY	**Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.** 1. The retention of trees to the south represents a positive outcome, and the creation of a pocket park is a generous and valuable contribution to the community. 2. The increased transparency of the secure car park is an improvement over the previously more concealed parking area. 3. Opportunities should be explored to introduce landscaping into the open car park to extend the canopy coverage and soften the transition between hard and soft landscape zones.
PRINCIPLE 2: Hassell Response	Supporting comments noted. - Built form location further refined to allow for retention of significant 'dead' jarrah tree to north western corner of site. - Permeable paving has been proposed to the car bay area within the secure car park to soften the car parking area and reduce the amount of hardscape. - At grade landscaping proposed as a buffer to service zones and within the central atrium.
PRINCIPLE 3: BUILT FORM AND SCALE	**Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.** 1. The proposed building height is supported. 2. The articulated northeast corner element with increased height is supported and represents a significant improvement on earlier proposals. 3. The addition of window awnings is an improvement on previous designs. Tailoring the awning designs to respond to different orientations would further improve solar performance and enhance visual interest.

PRINCIPLE 3: Hassell Response	Supporting comments noted. - Awnings have been provided to windows on the eastern, northern and western facades, with the north facing windows having a horizontal awning, and the east and west facing windows having a horizontal and vertical awnings to improve solar shading and provide a point of difference to each façade.
PRINCIPLE 4: **FUNCTIONALITY AND** **BUILD QUALITY**	**Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life cycle.** 1. The apartment layouts are efficient and well-considered. 2. Locating store rooms adjacent to each apartment is supported. 3. Circulation to access the Ground Floor communal spaces has been resolved. 4. The car park layout is simple and well-organised. 5. The centralised location of the air-conditioning plant is supported. 6. One apartment entry door is located directly opposite a lift door, and it is recommended that this arrangement be reviewed for potential amendment. 7. The use of robust materials, particularly at ground level, is supported.
PRINCIPLE 4: Hassell Response	Supporting comments noted. - The apartments located on the north eastern corner of the floor plate have been reconfigured, and the entry door relocated to be removed from the lift lobby and mitigate any loss of privacy to the dwellings adjacent to the lift lobby.
PRINCIPLE 5: **SUSTAINABILITY**	**Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.** 1. The overall building orientation is supported. 2. The abundance of corner apartments allows for effective natural ventilation. 3. There may be opportunities for some north-facing apartments to achieve cross-ventilation through the open-air circulation zone, provided that privacy is maintained. 4. The provision of motorcycle and bicycle parking areas is a positive feature.
PRINCIPLE 5: Hassell Response	Supporting comments noted. - The opportunity for additional openings to the corridor side of dwellings is to be explored during Design Development phase in conjunction with the construction methodology and fire protection strategies.
PRINCIPLE 6: **AMENITY**	**Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.** 1. The well-sized recessed balconies provide good privacy and protected outdoor amenity for residents.
PRINCIPLE 6: Hassell Response	Supporting comments noted.
PRINCIPLE 7: **LEGIBILITY**	**Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.** 1. The corner entry, highlighted by a change in scale and materiality, successfully establishes a clear and legible main entry point. 2. The internal circulation is simple and intuitive.
PRINCIPLE 7: Hassell Response	Supporting comments noted.
PRINCIPLE 8: **SAFETY**	**Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.** 1. Passive surveillance throughout the site is supported. 2. The introduction of a garrison-style fence between the car park and the communal open space to the south will improve visibility and enhance safety in both areas.
PRINCIPLE 8: Hassell Response	Supporting comments noted.

PRINCIPLE 9: COMMUNITY	**Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.** 1. The well-positioned and thoughtfully designed ground floor communal spaces promote resident interaction and contribute to a sense of community.
PRINCIPLE 9: Hassell Response	Supporting comments noted.
PRINCIPLE 10: AESTHETICS	**Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.** 1. The revised approach to building massing has achieved a more visually interesting and balanced aesthetic outcome. 2. The restrained material and colour palette, combined with the articulated northeast corner, is supported. 3. Further refinement of the solar shade design to respond more specifically to orientation could enhance both functionality and visual appeal. 4. Opportunities should be explored to integrate public art within the design.
PRINCIPLE 10: Hassell Response	Supporting comments noted. - Awnings have been provided to windows on the eastern, northern and western facades, with the north facing windows having a horizontal awning, and the east and west facing windows having a horizontal and vertical awnings to improve solar shading and provide a point of difference to each façade. - It is envisaged the public art strategy will be developed as a part of the broader public art strategy across the HAFF projects, with the artwork intended to be an integral element within the public realm that contributes to the quality and experience of the broader station plaza, and to draw on the rich Whadjuk Noongar history in the area.

CITY OF Armadale

MRA
Appendix 1

Infant Health Clinic (fmr)

SITE INFORMATION		
Other Names	-	
Street Address	2821 Albany Highway	
Locality	Kelmscott	
Landgate PIN	349113	
Land Information	Lot 1092	Vol/Folio 3150197
	Plan P160873	
GPS	-32.114273, 116.0143	

HERITAGE LISTINGS AND SURVEYS	
DPLH inHerit Database	-
Previous AMHI	-
Other Listings	-

PLACE TYPE	Historic Site
Original Use	Health - Hospital
Current Use	Other
Other Use	-

CITY OF Armadale

MRA
Appendix 1

CONSTRUCTION DETAILS	
Construction Date	1936-1940
Walls	-
Roof	-
Architectural Style	-

PHYSICAL DESCRIPTION

The place is located adjacent to Albany Highway close to the Kelmscott train station. The place is currently used as a car park for the train station. There are no physical remnants of the clinic.

Condition	-
Integrity	-
Authenticity	-
Date of Survey	05/03/2019

HISTORICAL INFORMATION

Infant health centres were established in Western Australia from the 1920s in response to high infant mortality rates. After a 1921 trial clinic in Perth, the first three permanent clinics were opened in 1923. Within 25 years there were 38 infant health centres across Western Australia, and almost 200 more clinics that did not have a permanent building. Many infant health centres were designed by notable Western Australian architect William Bennett, who was honorary architect to the Infant Health Association. From the latter 1940s, Nancy Allen of William Bennett & Associates also designed the centres. Attendance at infant health centres peaked through the 1950s and 1960s, after which infant mortality was so low that demand for their services declined.[1]

A combined Gosnells and Armadale-Kelmscott infant health services was offered from 1936, supported by local community groups. Irene Nellie Boylson was the first nurse. After much fundraising, work commenced in 1940 to construct permanent premises for the service in the railway reserve at Kelmscott, facing Albany Highway. The building was designed by William Bennett and constructed by Mr E. Allwood. The infant health clinic opened at Kelmscott on 31 August 1940. In addition to health services it was a community meeting and recreation space, especially for women. The place continued to function as a child health clinic until it was demolished in the summer of 2005-2006 as part of upgrades to Kelmscott Railway Station.[2]

At Armadale, land was made available by the Roads Board in 1946, but work did not commence until 1949. Volunteer labour cleared the site and brought 20,000 bricks from the former Armadale Brickworks site. The Infant Health Clinic was opened by Dame Florence Cardell-Oliver, Minister for Health, in November 1949. In 1956, the clinic acquired a van to allow its nurse to make visits to outlying districts.[3]

1 HCWA, PO5682 *Lady Mitchell Memorial Child Health Centre, Bunbury*, Assessment Documentation, February 2019, pp.6-9
2 Historical Research & Publication Services, 'Kelmscott Infant Health Centre', City of Armadale Historic Sites Plaque Project, 4 August 2018; Aerial photographs, 2004-2008, Landgate Mapviewer
3 Carter & Carter, pp.232-233

MRA
Appendix 1

Historic Theme	Social & Civic Activities: Health Social & Civic Activities: Community Services and Utilities People: Women
Associations	Nancy Allen of William Bennett & Associates (Architect) Irene Nellie Boylson (first nurse)
Sources	-

STATEMENT OF SIGNIFICANCE

The Infant Health Clinic (fmr) has cultural heritage significance for the following reasons:

- The place has historic value as its establishment in 1936-1940 follows the opening of the first infant health clinics in Perth from 1923. It was constructed with bricks from the former Armadale Brickworks site and was opened by Dame Florence Cardell-Oliver, Minister for Health, in November 1949.
- The place has social value as the project was driven by local community and is highly valued by local parents.

Management Category	4
Level of Significance	Little

ADDITIONAL PHOTOGRAPHS

View to the south of the car park with mature trees.
Source: SCA 05/03/2019

ADDITIONAL PHOTOGRAPHS

Kelmscott Infant Health Centre
Source: Birtwistle Library.

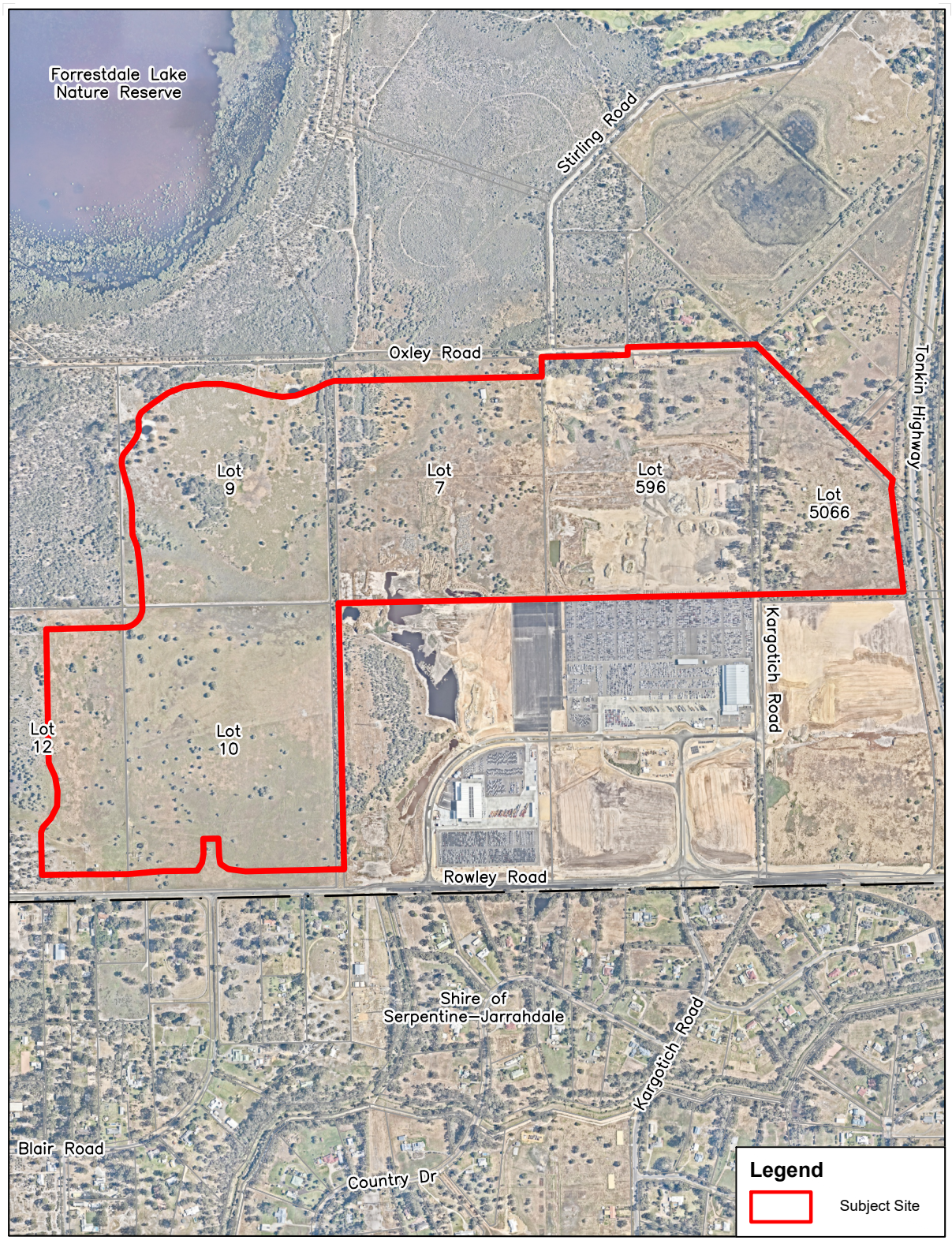
Kelmscott Infant Health Centre
Source: Birtwistle Library.

Kelmscott Infant Health Centre
Source: Birtwistle Library.

Kelmscott Infant Health Centre
Source: Birtwistle Library.

Source: Amateur Photograph. November 1949. "Cutting of the cake at the opening of the infant Health Centre." Picture Armadale Collection, Birtwistle Library.

Source: Amateur Photograph. November 1949. "Opening of the Infant Health Centre, Armadale" Picture Armadale Collection, Birtwistle Library.



AERIAL PHOTOGRAPH
Doobarda Industrial Business Park Stage 2

150 0 150 300m

SCALE 1 : 15000

Based on information provided by and with the permission of the Western Australian Land Information Authority trading as Landgate (2012). Aerial photograph supplied by Landgate, Photomaps by Nearmap.

DATE 12 January 2026 - REVISION 2601
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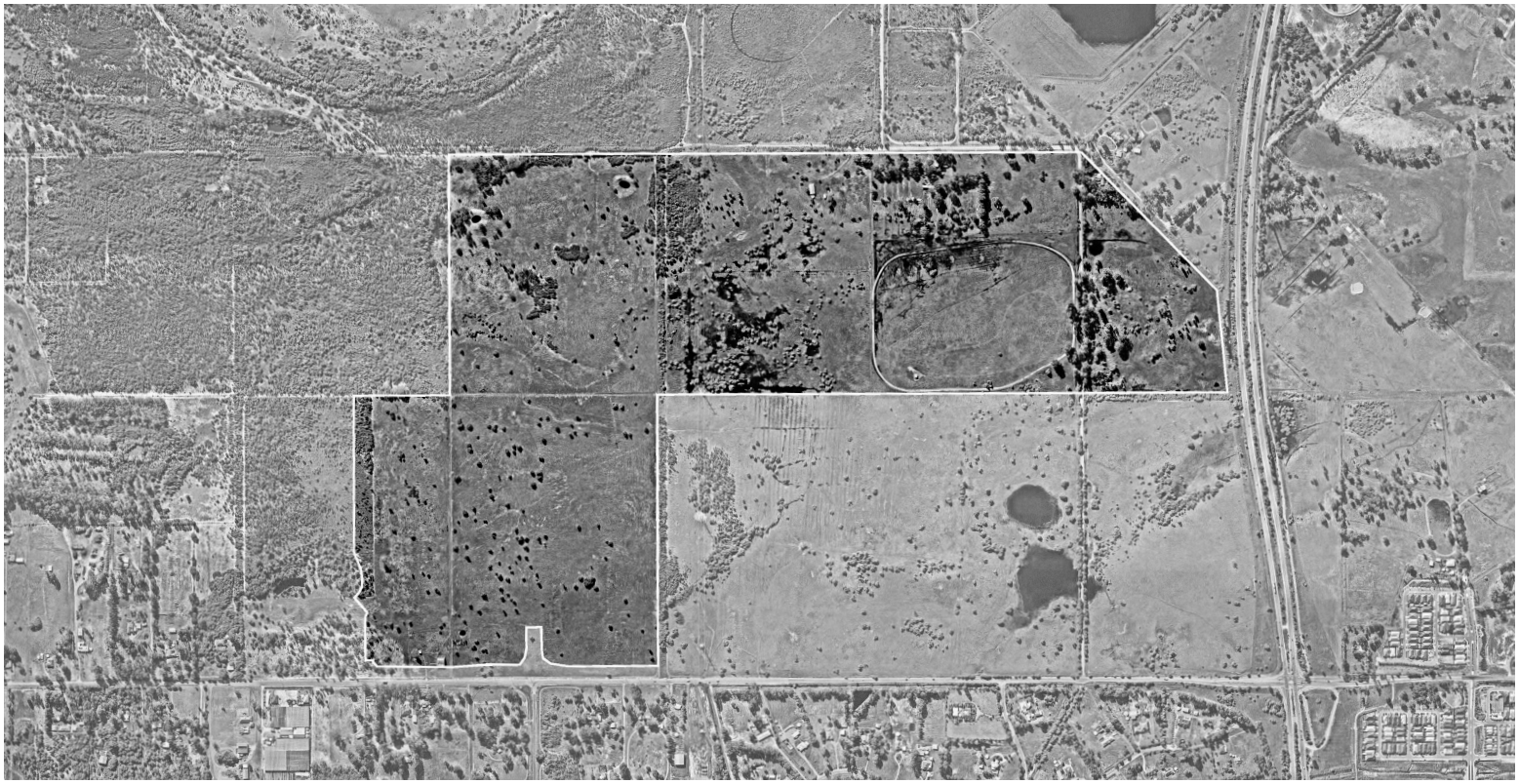
CITY OF Armadale



Doobarda Stage 2 Industrial Area Structure Plan

Part One – Implementation Report

SEPTEMBER 2024

CLE Town Planning + Design

CLE Town Planning + Design

Title	Doobarda Stage Two Industrial Area Structure Plan Part One – Implementation Report
Prepared for	Rowley Road Landowner Group
Date	16 September 2024
Status	Final
Prepared by	CLE Town Planning + Design
CLE reference	3766Rep11A

Approval Page

IT IS CERTIFIED THAT THIS PRECINCT STRUCTURE PLAN WAS APPROVED BY RESOLUTION OF THE WESTERN AUSTRALIAN PLANNING COMMISSION ON:

_____

Date

Signed for and on behalf of the Western Australian Planning Commission:

_____

an officer of the Commission duly authorised by the Commission pursuant to section 16 of the Planning and Development Act 2005 for that purpose, in the presence of:

_____

Witness

_____

Date

_____Date of Expiry

Table of Amendments

Amendment No.	Summary of Amendment	Amendment Type	Date Approved by WAPC

Executive Summary

The Doobarda Stage Two Industrial Area Structure Plan ('the Structure Plan') is approximately 164 hectares in area and comprises Lots 5066 Kargotich Road, Lot 5 (No.596) Oxley Road, Lot 7 Oxley Road, Lot 9 Oxley Road, Lot 10 Rowley Road and a portion of Lot 12 (No.863) Rowley Road, Doobarda ('the Structure Plan area').

The Structure Plan provides a framework to coordinate the subdivision and development of the land and will accommodate a range of industrial land uses and lot sizes that maximise the strategic location of the site, consistent with the longer term planning for the land as an industrial area. The Structure Plan layout responds to the locational and site characteristics of the land by carefully managing the interface with adjacent environmental features and coordinating the distribution of development infrastructure across fragmented land ownership. Key matters that have informed the Structure Plan Map are:

- The direct frontage to Rowley Road as a future key east-west connection in the sub-region which will provide the primary access into the Structure Plan area.
- Opportunity to offer a diverse range of land uses due to the Structure Plan's exposure to Rowley Road and proximity to the intersection with Tonkin Highway to the east.
- Coordination of road access, servicing and drainage to integrate the Structure Plan area with the Stage 1 South Forrestdale Industrial Area Local Structure Plan, and enable the seamless integration and function of the collective Doobarda industrial precinct.
- Management of the industrial interface with adjoining environmental features.
- The distribution of drainage infrastructure in response to the sites unique topographical and hydrological characteristics in an equitable manner across the fragmented ownership of the Structure Plan area.

The Structure Plan abuts the Stage 1 South Forrestdale Industrial Area Local Structure Plan ('Stage 1 Local Structure Plan') currently under development to the south and east, integrating with the road connections and design layout. Industrial development within the collective Stages 1 and Stage 2 industrial areas is referred to within this Structure Plan as the 'Doobarda Industrial Precinct'.

The following technical reports have been prepared to support the Structure Plan in accordance with the requirements of the City of Armadale Town Planning Scheme No.4 (TPS 4):

- Bushfire Management Plan
- Engineering Servicing Report
- Environmental Assessment
- Buffer Management Plan
- Local Water Management Strategy
- Transport Impact Assessment

The Structure Plan and supporting technical reports comprehensively resolve the potential constraints of the land. It establishes a framework for the future subdivision and development for industrial purposes and the ongoing management and protection of key environmental features.

Land Use Summary

Table 1 provides a land use summary of the Structure Plan area.

Item	Data	Section Number
Total area covered by the structure plan	166.46ha	Plan A
Area of each land use proposed: Zones · Industrial Business · General Industry Reserves · Parks and Recreation	 9.09ha 102.07ha 32.55ha	Section 4.1
Estimated lot yield*	140	Section 4.1
Amount of Public Open Space · CCW / REW / Bush Forever Buffers · Drainage · Unconstructed road reserve	 14.39ha 17.10ha 1.06ha	Section 4.1.3

**The lot yield is based on the anticipated mix of industrial land uses and associated lot sizes and is expected to change based on market demand.*

Table 1: *Land Use Summary*

Part One - Implementation Report

Contents

1. Structure Plan Area & Operation *4*
1.1 Application Area & Operation 4
1.2 Relationship with Statutory Planning Framework 4
1.3 Structure Plan Content 4
2. Purpose *6*
3. Staging *7*
4. Subdivision & Development Requirements *8*
4.1 Land Use Zones & Reserves 8
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5. Additional Details *12*
5.1 Information to be Submitted with a Subdivision Application 12
5.2 Studies to be Required Under a Condition of Subdivision Approval 12
5.3 Studies to be Required Under a Condition of Development Approval 13

Plans

Plan A: Local Structure Plan Map

Figures

Figure 1: Distributor Road Cross Section
Figure 2: Local Road Cross Section

Appendices

Appendix 1: Local Water Management Strategy (JDA Consulting Hydrologists)
Appendix 2: Environmental Assessment Report (PGV Environmental)
Appendix 3: Buffer Management Plan (PGV Environmental)
Appendix 4: Transport Impact Assessment (Shawmac)
Appendix 5: Bushfire Management Plan (Lush Fire)
Appendix 6: Engineering and Servicing Report (TABEC)

1. Structure Plan Area & Operation

1.1 Application Area & Operation

This Structure Plan applies to Lots 5066 Kargotich Road, Lot 5 (No.596) Oxley Road, Lot 7 Oxley Road, Lot 9 Oxley Road, Lot 10 Rowley Road and a portion of Lot 12 (No.863) Rowley Road, Doobarda being the land within the inner edge of the line denoting the structure plan boundary on the Structure Plan Map (**Plan A**). The structure plan boundary is consistent with the land zoned 'Industrial Development' under the City of Armadale Town Planning Scheme No. 4 ('TPS 4') and is identified as the Doobarda Stage 2 Industrial Structure Plan.

The Structure Plan comes into effect from the date it is endorsed by the Western Australian Planning Commission for a period of 10 years.

1.2 Relationship with Statutory Planning Framework

The Structure Plan is prepared pursuant to Part 5A and Schedule 4 of the TPS 4 and the Planning and Development (Local Planning Schemes) Regulations 2015 Schedule 2 - Deemed provisions for local planning schemes ('Deemed Provisions'). The Structure Plan establishes zones and reserves as well as subdivision, development and infrastructure requirements.

Pursuant to the Deemed Provisions, a decision maker of an application for development or subdivision approval is to have due regard to the provisions of this Structure Plan

1.3 Structure Plan Content

The Structure Plan comprises:

- Part One – Implementation Report
- Part Two – Explanatory Report
- Appendices – Technical Reports

Part One of the Structure Plan comprises the Structure Plan Map and supporting planning provisions. Part Two of the Structure Plan provides the explanatory component, which can be used to interpret and implement the requirements of Part One.

2. Purpose

The purpose of the Structure Plan is to coordinate the subdivision and development of the Structure Plan area and deliver strategic industrial land to market. The key objectives of the Structure Plan are as follows:

Coordination of Fragmented Ownership: The Structure Plan provides a framework for the development of land under fragmented land ownership, comprising six individual landowners. This includes the coordination of road alignments, road and intersection upgrades, earthworks, drainage and connections to essential service infrastructure.

Economic Development: The Structure Plan provides for a range of industrial land uses and lot sizes to support local and regional business growth and provide employment opportunities within the City of Armadale. Land uses adjacent to Rowley Road will take advantage of the high visibility and accessibility of the road frontage, and will offer more service-based land uses that are compatible with industrial development.

Integration with Stage 1: The Structure Plan provides for the logical extension of development from the existing approved Stage 1 Local Structure Plan area, coordinating the connection of roads and drainage.

Management of Environmental Features: The Structure Plan addresses adjacent environmental features including Bush Forever Conservation Category Wetlands and Resource Enhancement Wetlands to protect, manage and enhance the interfaces.

Service Infrastructure: The Structure Plan identifies the necessary connections to water, sewer and power and establishes a strategy for the future coordination and provision of the infrastructure.

Drainage Coordination: The Structure Plan provides a framework to capture and treat stormwater within the Stage 2 Structure Plan area and manage potential impacts to external hydrological or environmental features. The drainage strategy seeks to match pre-development outflows into the Stage 1 drainage areas before discharging into the Birriga Main Drain to the south of Rowley Road.

3. Staging

The Structure Plan area consists of six lots, each in separate ownership. Staging for each lot will be subject to landowner intentions on timing to commence subdivision and development works and access to roads and service infrastructure.

Rowley Road provides access into the Structure Plan area and connects the site to the broader regional road network. Access to Rowley Road is expected to inform initial staging for the Structure Plan Area. Lots 10 and 12 have direct frontage to Rowley Road and can be accessed without relying upon the extension of roads through adjoining land.

Lots 5066 and 5 will have access to Rowley Road through the Stage 1 road network once gazetted via the existing Kargotich Road reserve, subject to the timing of subdivision and development within Stage 1. Lot 7 is owned by the landowner of Stage 1 and the Structure Plan makes provision for a road connection into Stage 1 through lot 8, enabling lot 7 to be access as required.

Staging of lot 9 will be reliant upon the connection of roads through either Lot 7 to the east or Lot 10 to the south.

The ability to extend and connect to service infrastructure will also need to be considered and reflected in the staging of the Structure Plan area.

4. Subdivision & Development Requirements

4.1 Land Use Zones & Reserves

4.1.1 Structure Plan Zones

Plan A is the Structure Plan Map which designates the proposed zones and reserves applicable to the land.

Subdivision and the development of land is to be generally in accordance with the Structure Plan Map.

The Structure Plan proposes the following zones as set out in **Table 2**, which accord with the City's TPS 4. Land use permissibility for land within the Structure Plan area shall be in accordance with the corresponding zone as set out in the TPS 4 zoning table.

Zone	Objectives
General Industry	*a) To provide for a wide range of industrial and associated activities, which can be undertaken without undue constraints on operational performance, so as to meet the needs of the wider community for industrial services and facilities.* *b) To facilitate the aggregation of industrial, storage and distribution activities, based on efficient use of infrastructure and synergies between industries and activities.*
Industrial Business	*a) To provide for a range of industrial business and related services to be accommodated in specific policy precincts and meet the needs of the district in relation to those goods and services which cannot be practically provided within commercial centres because of either the extensive land area requirements or the performance characteristics of the activity.* *b) To ensure development and operation of businesses achieves relatively high environmental performance and amenity standards based on the level of public access and proximity to residential areas.*

Table 2: *Structure Plan Zones*

4.1.2 Road Reserves

The Structure Plan is subject to the following key movement network considerations:

- The street network should be developed generally in accordance with the road hierarchy shown on the Structure Plan Map, which identifies higher order roads as Distributor Roads and lower order roads as Local Roads. Indicative cross sections for these two road reserves are illustrated in **Figure 1** and **Figure 2** below. All road reserve widths and design treatments will be confirmed at subdivision stage.
- Key connections and intersection types providing access into the structure plan from Rowley Road are identified on the Structure Plan Map. Intersection treatments to Rowley Road should be generally in accordance with the Structure Plan, with final intersection treatments and interim construction opportunities to be determined at subdivision stage.
- 30m of widening is required to the Rowley Road reserve to facilitate road and intersection upgrades.
- Pedestrian footpaths shall be provided to one side of each road.

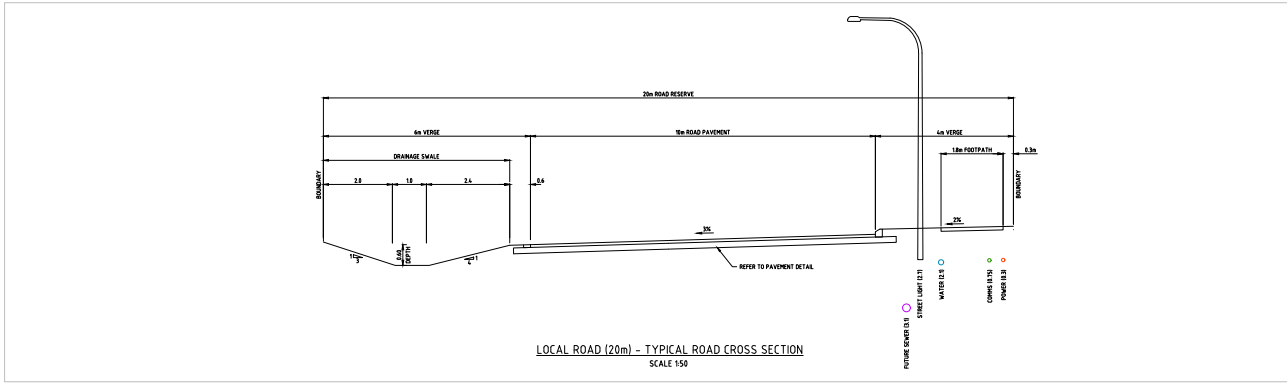

***Figure 1**: Local Road Cross Section (Source: TABEC 2024)*

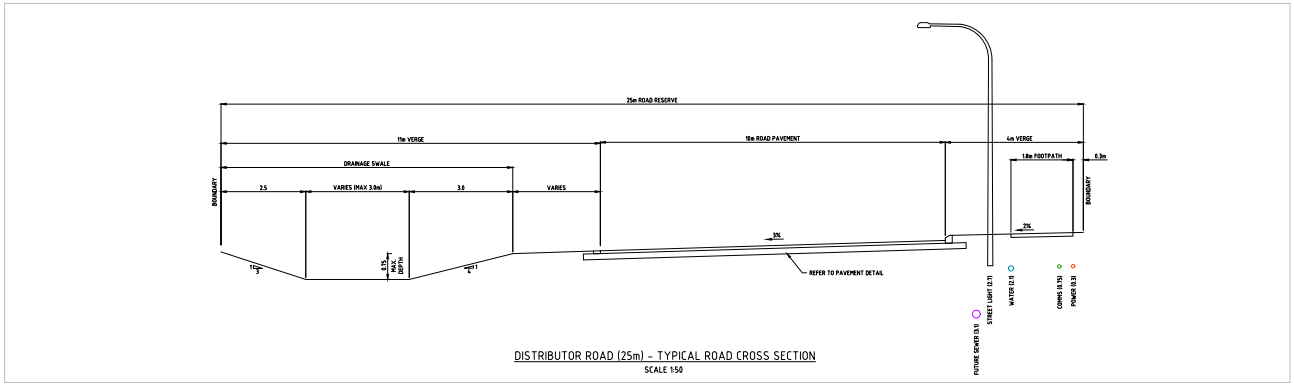

***Figure 2**: Distributor Road Cross Section (Source: TABEC 2024)*

4.1.3 Other Reserves

Parks & Recreation

The **Plan A** Structure Plan Map identifies approximately 32.55ha of land as local 'Parks and Recreation' reserves as either buffers or drainage.

Buffers

Approximately 14.39ha is provided as buffers to adjoining areas of Bush Forever, Conservation Category Wetland's (CCW) and the Resource Enhancement Wetland (REW). Local reserves for buffers will be ceded free of cost in accordance with clause 46.3(c) of Development Area 46 of TPS 4 at the time the immediately abutting land is subdivided for industrial purposes.

Drainage

Approximately 17.10ha is provided for the purpose or drainage and is identified as 'Parks and Recreation – Drainage' on the Structure Plan Map. The size and location of Parks and Recreation reserves for drainage purposes should be provided generally in accordance with the Structure Plan Map, subject to confirmation and refinement at subdivision stage support by relevant technical justification.

Public Purpose

A 'Public Purpose – Water Authority of WA' reserve is proposed at the southern boundary of lot 7 for the purpose of a Wastewater Pump Station. The location of the Wastewater Pumping Station is subject to confirmation at subdivision stage in consultation with relevant agencies.

4.2 Other Requirements

4.2.4 Bushfire Management

A Bushfire Management Plan (BMP) is included as **Appendix 5** to the Structure plan which outlines management measures for the development of land including separation of habitable buildings from areas identified as BAL-40 and above, management of vegetation in a low threat standard, the provision of two vehicle access points and the provision of a water supply and associated infrastructure.

Minimum building setbacks to habitable buildings may be addressed via a bushfire management plan at subdivision and development application stages. The BMP includes obligations for subsequent bushfire management plan/s to be provided at subdivision stage in accordance with State Planning Policy 3.7 to respond to detailed subdivision design.

4.2.5 Infrastructure Arrangements

Wastewater

A wastewater pumping station is required generally in accordance with the location identified on **Plan A**. Connection of a sewer trunk main is required to discharge wastewater from the site.

Water

A water trunk main is required to service the Structure Plan area.

Drainage

Given the fragmented ownership of the site, drainage infrastructure is coordinated and distributed to ensure that each lot can manage its own drainage requirements without reliance upon common infrastructure. The principle is reflected in the Structure Plan Map and detailed within the Local Water Management Strategy included as **Appendix 1** of this Structure Plan.

4.2.6 Rowley Road Upgrade

Allowance is made for 30m of widening to Rowley Road consistent with the adjacent Stage 1 Structure Plan area and the TPS4 zoning boundary. Upgrading of Rowley Road from a rural standard to an urban standard is necessary to accommodate the traffic volumes generated by the Structure Plan area, including Stage 1.

Road and intersection upgrades abutting the Structure Plan area will be staged commensurate with the demand generated by industrial development to be demonstrated at the time of subdivision. Any additional upgrades generated over and above development of the Structure Plan area by external traffic is the responsibility of others.

At the time of subdivision, the land required for widening of Rowley Road will be created as a separate lot pending acquisition.

4.2.7 Protection or Management of Environmental Factors

A Buffer Management Plan is included as **Appendix 3** which requires the management and upgrade of buffer areas adjacent to Bush Forever site 345 and Conservation Category Wetlands. Implementation of the Buffer Management Plan will be required as a condition of subdivision approval.

4.2.8 Western Power Easement

Lot 7 is encumbered by an easement to the State Energy Commission of Western Australia (Western Power). This easement traverses north–south through lot 7, across land zoned within this Structure Plan as 'General Industry' and land reserved as 'Parks and Recreation – Drainage'. Any proposal for the use and/or development of land encumbered by the easement shall be referred to Western Power for comment and shall:

i. Demonstrate compliance with the conditions of the easement as specified by Western Power;

ii. Incorporate appropriate built form to ensure the use and development of land underneath the easement will not unreasonably encroach upon the easement, to the satisfaction of the responsible authority on the advice of Western Power; and

iii. Information shall be provided in the form of a Western Power Transmission Clearance Study as a condition of subdivision and/or at development application stage consistent with the requirements of Schedule 8 of LPS 4.

4.2.9 Infrastructure Funding

Due to fragmented ownership, a Development Contribution Plan (DCP) across the Stage 1 and Stage 2 Structure Plan areas is required to fund common infrastructure including but not limited to:

- Distributor Roads;
- Rowley Road widening and upgrades;
- Rowley Road intersections; and
- Service infrastructure.

5. Additional Details

5.1 Information to be Submitted with a Subdivision Application

The following additional technical reports/plans are to be submitted with subdivision applications, where relevant:

Additional Information	Reason / Purpose	Responsible Agency
Bushfire Management Plan	To demonstrate that subdivision and development will satisfy the WAPC's Guidelines for Planning in Bushfire Prone Areas.	City of Armadale
Traffic Impact Statement / report	A Traffic Impact Statement or Report is to include an updated capacity analysis for upgrades to Rowley Road and any proposal for the staged delivery of roads and intersections.	City of Armadale

Table 3: *Information Submitted with a Subdivision Application*

5.2 Studies to be Required Under a Condition of Subdivision Approval

The following technical reports/plans are to be prepared and submitted as a condition of subdivision approval (where applicable):

Additional Information	Reason / Purpose	Responsible Agency
Landscape Plan	To demonstrate proposed landscape treatment of buffer areas and drainage reserves.	City of Armadale
Urban Water Management Plan	To detail the management of stormwater both on and off site in accordance with the WAPC's Better Urban Water Management Guidelines and approved Local Water Management Strategy (Appendix 1). The UWMP should address any proposed staging of drainage infrastructure and any temporary/interim drainage measures.	City of Armadale
Acid Sulphate Soils Management Plan	To confirm the potential existence of acid sulphate soils and any subsequent management strategies to prevent any adverse environmental impacts.	City of Armadale
Western Power Transmission Clearance Study	To identify clearance and development requirements within the easement including: · Landscaping plans (including mature heights and location of species); · Ground level changes; · Permanent structures; · Drainage plans; · Conservation controls.	City of Armadale

Table 4: *Condition of Subdivision Approval*

5.3 Studies to be Required Under a Condition of Development Approval

The following additional technical reports/plans prior to lodgement of development application(s):

Additional Information	Reason / Purpose	Responsible Agency
Western Power Transmission Clearance Study	To demonstrate that development is consistent with the expectations of the Western Power Clearance Study prepared as a condition of subdivision.	Western Power

Table 5: *Condition of Development Approval*

CLE Town Planning + Design

PLAN A: STRUCTURE PLAN MAP
Doobarda Industrial Area

plan no: **3766-13G-01**
date: 29 August 2024
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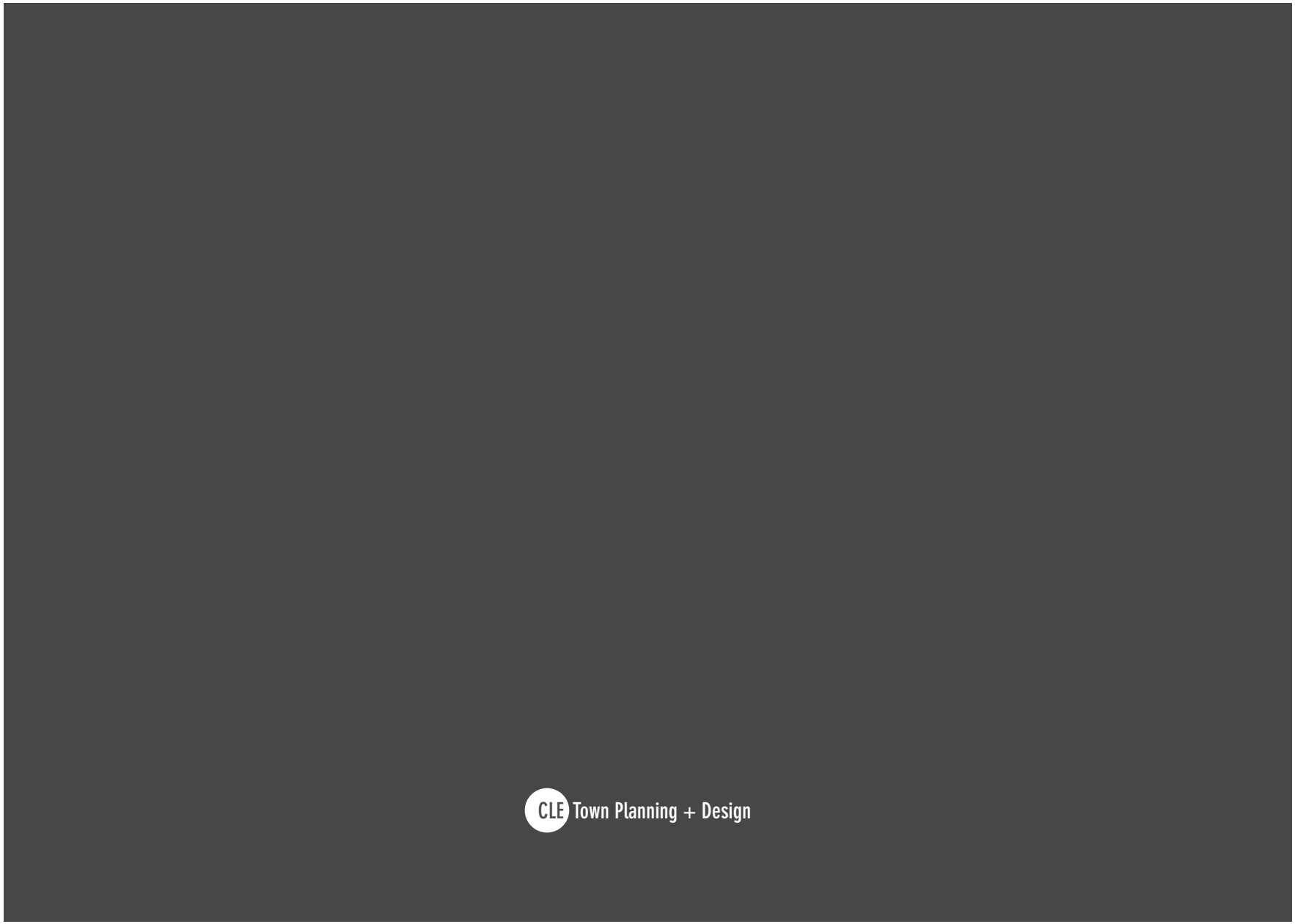

CLE Town Planning + Design

CLE Town Planning + Design

PLAN A: STRUCTURE PLAN MAP

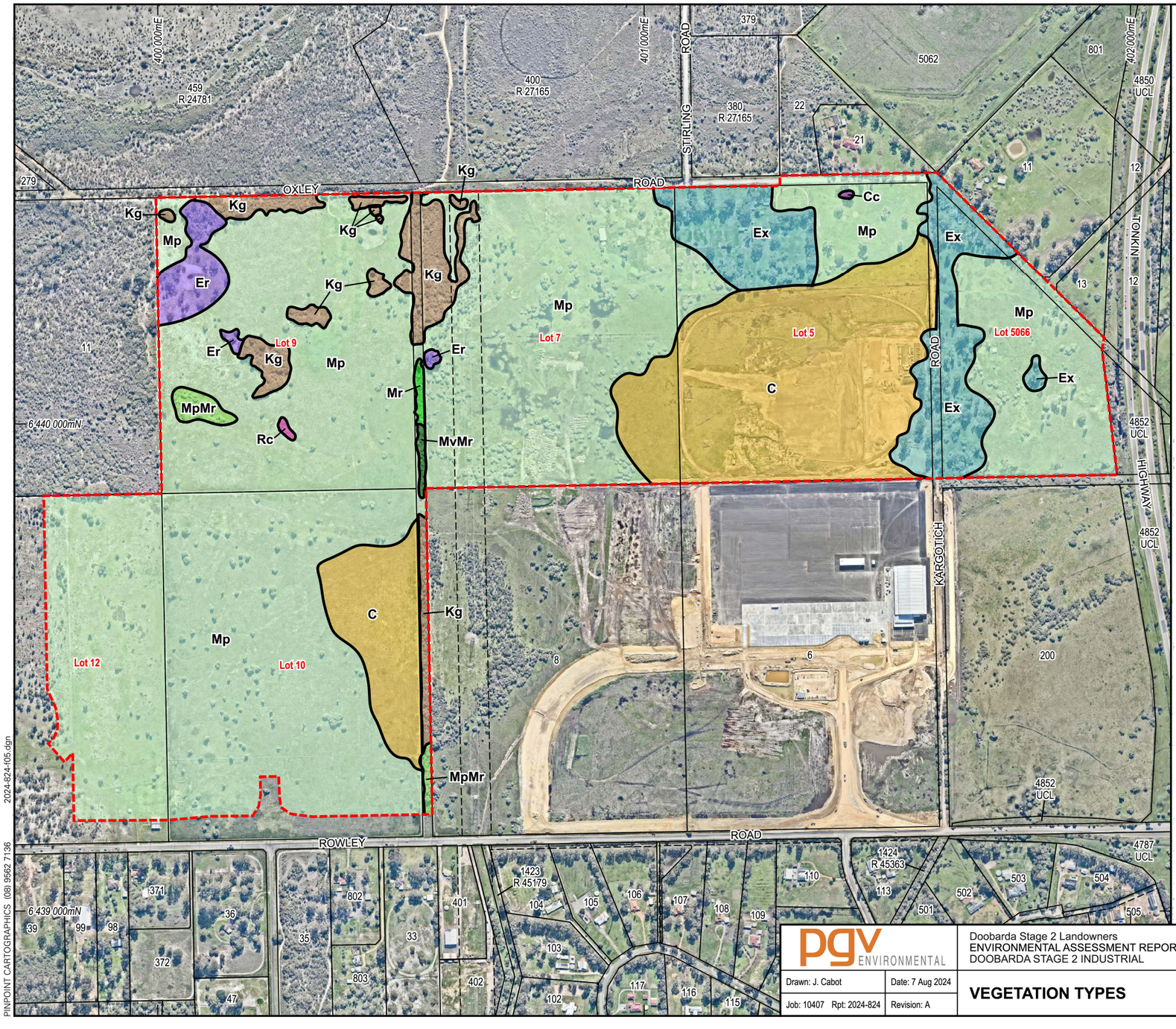
Doobarda Industrial Area

plan no: **3766-13G-01**
date: 29 August 2024
scale: 1:10,000 @A4

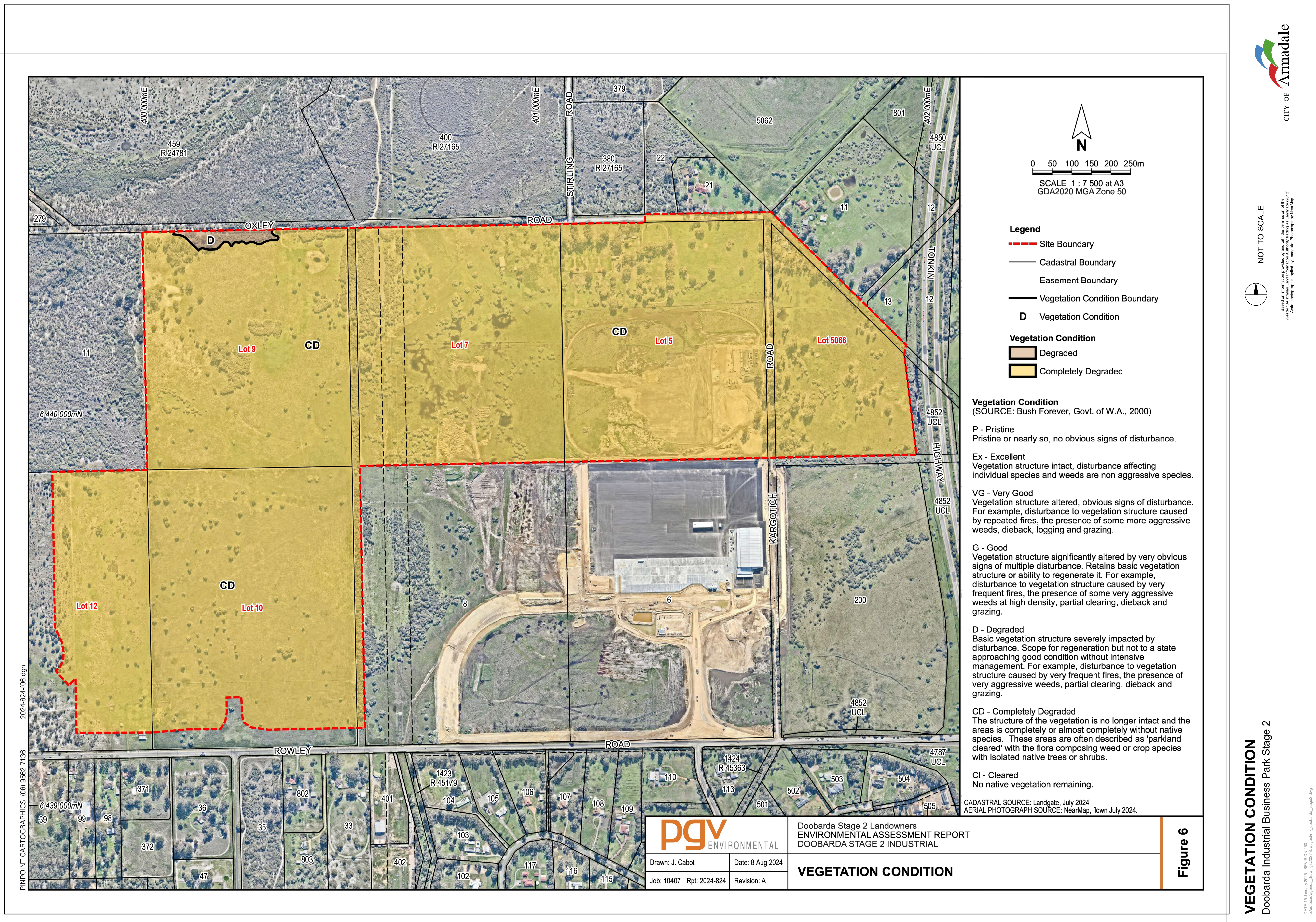
CITY OF Armadale

NOT TO SCALE

STRUCTURE PLAN
Doobarda Industrial Business Park Stage 2



VEGETATION TYPES
Doobarda Industrial Business Park Stage 2


OXLEY ROAD
STIRLING ROAD
KARGOTICH ROAD
TONKIN HIGHWAY
ROWLEY ROAD
Lot 9
Lot 7
Lot 5
Lot 5066
Lot 12
Lot 10
CD
D
N
0 50 100 150 200 250m
SCALE 1 : 7 500 at A3
GDA2020 MGA Zone 50
Legend
Site Boundary
Cadastral Boundary
Easement Boundary
Vegetation Condition Boundary
D Vegetation Condition
Vegetation Condition
Degraded
Completely Degraded
Vegetation Condition
(SOURCE: Bush Forever, Govt. of W.A., 2000)
P - Pristine
Pristine or nearly so, no obvious signs of disturbance.
Ex - Excellent
Vegetation structure intact, disturbance affecting individual species and weeds are non aggressive species.
VG - Very Good
Vegetation structure altered, obvious signs of disturbance. For example, disturbance to vegetation structure caused by repeated fires, the presence of some more aggressive weeds, dieback, logging and grazing.
G - Good
Vegetation structure significantly altered by very obvious signs of multiple disturbance. Retains basic vegetation structure or ability to regenerate it. For example, disturbance to vegetation structure caused by very frequent fires, the presence of some very aggressive weeds at high density, partial clearing, dieback and grazing.
D - Degraded
Basic vegetation structure severely impacted by disturbance. Scope for regeneration but not to a state approaching good condition without intensive management. For example, disturbance to vegetation structure caused by very frequent fires, the presence of very aggressive weeds, partial clearing, dieback and grazing.
CD - Completely Degraded
The structure of the vegetation is no longer intact and the areas is completely or almost completely without native species. These areas are often described as 'parkland cleared' with the flora composing weed or crop species with isolated native trees or shrubs.
Cl - Cleared
No native vegetation remaining.
CADASTRAL SOURCE: Landgate, July 2024
AERIAL PHOTOGRAPH SOURCE: NearMap, flown July 2024.
pgv ENVIRONMENTAL
Doobarda Stage 2 Landowners
ENVIRONMENTAL ASSESSMENT REPORT
DOOBARDA STAGE 2 INDUSTRIAL
Drawn: J. Cabot
Date: 8 Aug 2024
Job: 10407 Rpt: 2024-824
Revision: A
VEGETATION CONDITION
Figure 6
PINPOINT CARTOGRAPHICS (08) 9562 7136
2024-824-f06.dgn
CITY OF Armadale
NOT TO SCALE
VEGETATION CONDITION
Doobarda Industrial Business Park Stage 2

6.2.4 Access to the Existing Road Network

The Structure Plan area is proposed to be serviced by two intersections with Rowley Road, one being a priority intersection within Lot 10, anticipated ultimately to be an at-grade 4-way roundabout at Blair Road. A second at-grade intersection is planned within Lot 12.

The approved Stage 1 Local Structure Plan indicates two intersections with Rowley Road, comprising an upgraded full-movement intersection with Kargotich Road and Rowley Road, and a left-in left-out intersection with Rowley Road within Lot 8, refer **Figure 16**.

To accommodate additional freight traffic, it is anticipated that Rowley Road will be ultimately upgraded to a primary distributor standard and comprise a 4-lane, dual carriageway with median separation, requiring a portion of the Structure Plan area to be dedicated for the purposes of future road widening.

All proposed intersections with Rowley Road are proposed to be designed to allow up to RAV 7 in anticipation of future broader upgrades to the road network.

External local road connections are provided to the north as connections of the existing 20m Kargotich Road Reserve and a proposed connection to Oxley Road / Stirling Road in the north western corner of lot 5. The Kargotich Road connection maintains access for possible future industrial development north of Oxley Road. The Stirling Road connection is not intended to accommodate industrial vehicle movements and shall be designed to discourage through movements of industrial vehicles.

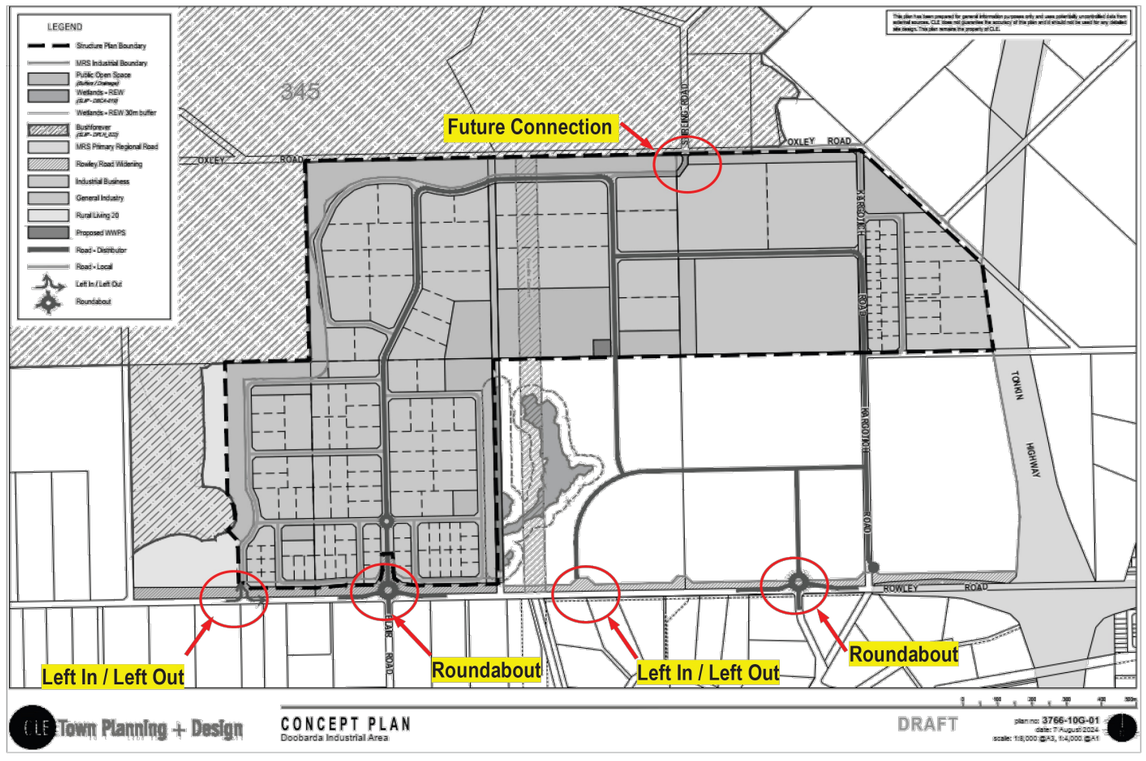


***Figure 16**: Proposed Doobarda Intersections with Rowley Road (Source: Shawmac 2024)*

CITY OF Armadale

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ROAD HIERARCHY PLAN
Doobarda Industrial Business Park Stage 2

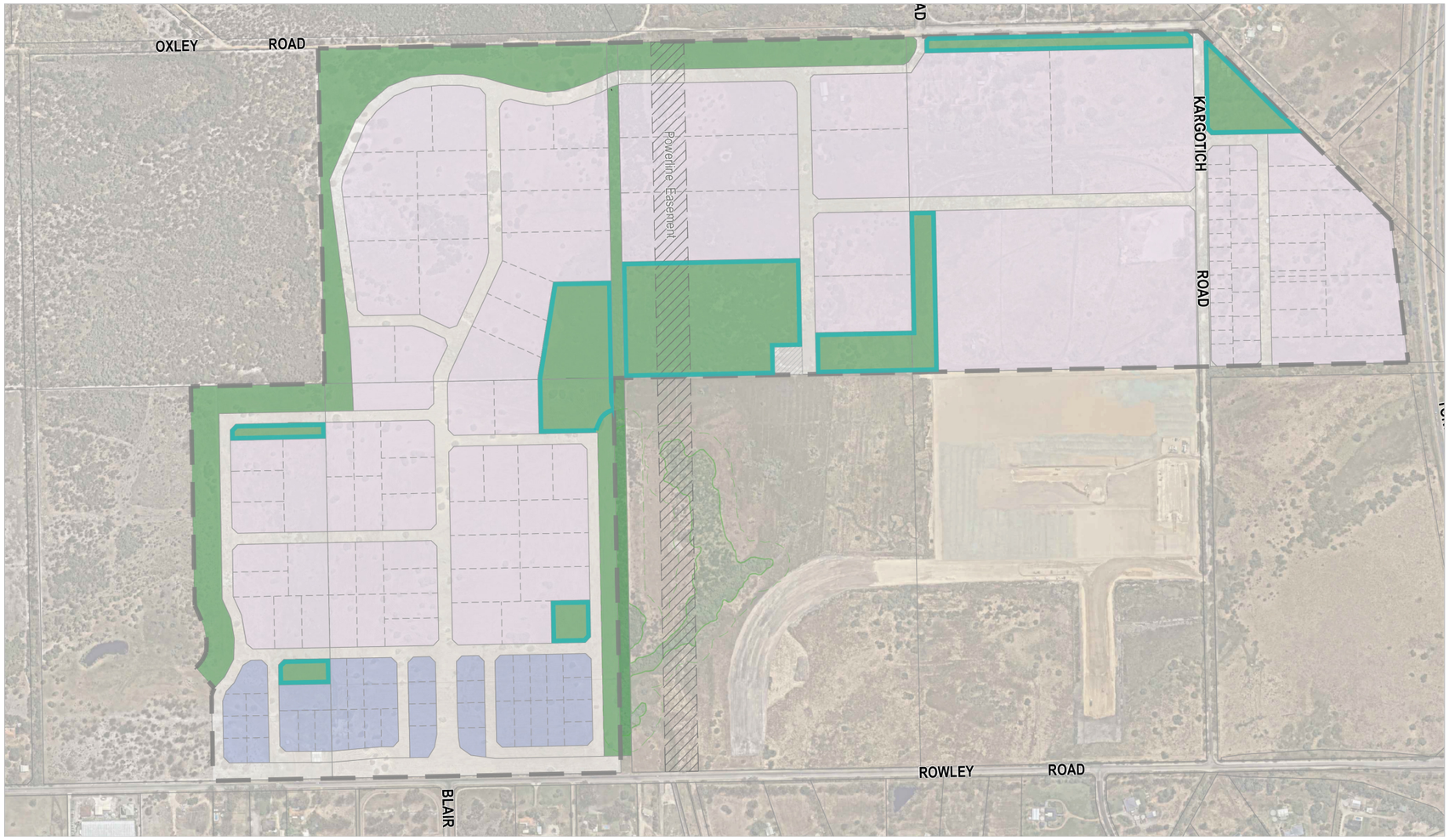

***Figure 19**: Public Open Space and Drainage Areas (Source: Nearmap)*

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Based on information provided by and with the permission of the Western Australian Land Information Authority trading as Landgate (2012). Aerial photographs supplied by Landgate. Photomaps by Nearmap.

POS AND DRAINAGE
Doobarda Industrial Business Park Stage 2

DATE 15 January 2025 - REVISION 25/01
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SCHEDULE OF SUBMISSIONS (PUBLIC) DOOBARDA INDUSTRIAL BUSINESS PARK STAGE 2 STRUCTURE PLAN			
NO	**SUPPORT, OBJECT, COMMENT**	**SUMMARY OF SUBMISSION**	**RECOMMENDATION**
1	Object	Objects for following reasons: • Looks horrendous • Ruins existing rural lifestyle • Increased traffic on already subpar roads • Constant illumination from businesses in industrial area • Continued disruption to area with development on going and truck movements associated with development • Don't want street lighting added to Rowley Road	See response to submission 3 below.
2	Object	• New road intersection of Rowley/Blair/new industrial road will make Blair Road a rat run for trucks. • Traffic will impact wildlife, ground water levels and pollution	The location of the principal entry point with a roundabout opposite Blair Road was determined during previous planning processes by the WAPC including the MRS and TPS Amendments. This was identified by the traffic consultants and Main Roads WA as the most appropriate location factoring in the spread and offset of intersections along the Stage 1 and Stage 2 frontage. The revised Traffic Impact Assessment lodged with the City identifies that there is currently a relatively low level of traffic using Blair Road on a daily basis, and use of this road is well within the capacity of a local road. However, it is agreed that once the industrial area develops the type of vehicles may change. It is appropriate for a provision/s to be included in the Structure Plan requiring the developer to modify the road pavement threshold to Blair Road such that the movement of heavy vehicles into Blair Road are discouraged. This could include threshold treatments that modify the alignment of Blair Road at the intersection (chicanes), raised platforms just past entrance to Blair Road and the installation of "Local Traffic Only" signs. Any proposed modification within the Blair Road reserve would have to be approved by the Shire of Serpentine Jarrahdale as they manage this local road.
3	Object	• Stage 1 of the industrial area has seen an excessive increase in noise and light pollution from floodlighting at night and noise during the day from vehicles being loaded and offloaded. • Increased traffic has also contributed to noise pollution. • A noise/light barrier on north side of Rowley Road may help reduce impact on rural properties to the south.	Conditions relating to the control of lighting to reduce potential light spill outside the future industrial lots will be placed on Development Approvals for businesses developed in the area. A provision requiring this consideration at Development Application stage is also recommended to be included in the Structure Plan for Stage 2. Main Roads WA have advised that ultimately Rowley Road is to be classified as a Primary Regional Road and will be widened to four (4) lanes. This is because Rowley Road will be one of the main transport routes from Tonkin Highway to the new Westport. Although some of the increased traffic on Rowley Road will be generated by the Doobarda Industrial area, there are increases in traffic on the road from the Wungong Masterplan area (Haynes and Hilbert) which will have an ultimate residential population of 40,000 people.
4	Support	Asked question of how far the industrial area would extend to the west in future.	Question responded to by email.
5	Object	Objects to industrial area being built on Forrestdale Lake.	The development area is south of Forrestdale Lake and includes buffer areas that will be reserved as public open space. These buffer areas will add to the separation between the industrial area and the lake provided by the Oxley Road reserve and conservation reserves between Oxley Road and Forrestdale Lake.

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6	Object	Proposal will be highly detrimental to local ecology and hydrology.	The land is identified for industrial development under the Perth and Peel @3.5 million frameworks, the Metropolitan Region Scheme and the City of Armadale's Town Planning Scheme No.4. Protection of environmental features external to the site are facilitated through the provision of buffers and revegetation of buffers to improve existing environmental qualities and provide separation of the industrial land to environmental features. An Environmental Impact Assessment was completed by the applicant to inform the Structure Plan as well as other technical documents such as a Buffer Management Plan. The Department of Environment has assessed the MRS amendment and TPS Amendment previously. A Fauna Relocation Plan can be recommended as a condition of the future subdivision.
7	Object	The industrial area will affect the wildlife and people in the area.	See response to Submission 6 above.
8	Object	• Has already noticed a huge increase in traffic in Blair Road over last 10 years. • The proposed development does not take into consideration residents who have lived in the area for a long time.	See response to submission 2 above.
9	Object	• The lake already runs dry and animals have to be relocated to be kept safe. • An industrial area that close to the lake would cause wildlife further distress.	See response to Submission 6 above.
10	Object	• The bright outdoor lights at the businesses that are operating in Stage 1 are affecting the flora and fauna in the area and nearby residential properties. • Stage 2 should not go ahead unless this issue is addressed properly.	See response to submission 3 above
11	Object	• Objects to any further development adjacent to Forrestdale Lake which is a wetland of international importance and habitat and refuge for waterbirds and other wildlife. • Wildlife in the area is already pushing further north into Forrestdale due to the noise and light spill from stage 1 of the industrial area.	See response to Submissions 3 and 6 above.
12	Object	• Forrestdale is currently quiet with bushland and wildlife. • The remaining bushland should be protected. • Don't destroy Forrestdale and turn it into Midland.	See response to Submission 6 above.
13	Object	• Signage advertising the proposal was inadequate and not in right locations for everyone to see it. • Stage 1 of the industrial area has already completely changed the landscape and visual scope of the rural area.	Signage placed adjacent to the development site during the advertising period was compliant with advertising requirements for Structure Plans contained in the *Planning and Development (Local Planning Schemes) Regulations 2015*.

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		• The land in the proposed industrial area is needed for drainage of water into Forrestdale Lake. • Constant dewatering is occurring in stage 1 of the industrial area which will cause trees on the surrounding properties to die. • Forrestdale Lake won't survive this dewatering. • Huge amounts of wildlife have been affected by the clearing that has already occurred in stage 1. • Many Melaleuca trees were bulldozed in stage 1 with no environmental reports submitted. • Most Melaleucas in stage 2 of the industrial should be required to be retained. • Strict environmental controls are required regarding wastewater drainage and lighting. Prix car is lit up like Optus Stadium	A Local Water Management Strategy (LWMS) has been prepared for the Industrial area and is subject to the approval of both the City of Armadale and the Department of Water and Environment Regulation. A requirement of LWMS is for pre and post development discharge of water to adjoining properties is of consistent quantity and quality. There are two different directions of water flow from the land within Stage 2 currently. Some of the land drains south to the Water Corporation's Main Drain south of Rowley Road and the northern part of Stage 2 drains to the north. Filling of land is necessary to enable development of the industrial area and this means that some existing trees must be removed. Lighting – see response to submission 3 above.
14	Object	• Sad to see plans closing in on a wetland of international importance and the wildlife. • The development will push snakes and Kangaroos towards the school and houses in Forrestdale.	See response to Submission 6 above.
15	Object	• This will affect wildlife in the area. • It should go somewhere else.	See response to Submission 6. Above.
16	Object	• The proposed industrial area will cause irreparable damage to Forrestdale Lake, wildlife and the environment. • It is also putting children at risk with increased traffic near to schooling.	See response to Submission 6 above. Traffic from the industrial area will not go through the existing Forrestdale townsite.
17	Object	• The proposed industrial area is too close to Forrestdale Lake which is a highly biodiverse area of immense ecological significance. • Forrestdale is home to a unique species of bee not found anywhere else, so the natural habitat is irreplaceable. • The development will disrupt the fragile ecosystem through increased pollution, habitat destruction and encroachment on green corridors.	See response to Submissions 6 and 13 above.
18	Object	• The proposed industrial development will have an adverse impact on Forrestdale Lake, flora and fauna. • The proposed industrial area threatens the important functions of Forrestdale Lake including flood control, water purification and essential habitats for diverse wildlife. • Increased human activity, noise and habitat fragmentation will occur as a result of the industrial area. • Industrial areas are associated with pollution risks including runoff of harmful chemicals, increased sedimentation and air pollution.	See response to Submissions 3, 6 and 13 above.

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		• Council should prioritise the protection of Forrestdale Lake and explore alternative locations for industrial areas.	
19	Object	• Is there plans to rehome/relocate all of the wildlife that lives in this area? • Forrestdale Lake will slowly die without all the wildlife.	See response to Submission 6 above
20	Object	Understands the importance of industrial development for regional economic growth but has the following concerns about the impact of the project: • Proximity to sensitive landscape including the Forrestdale Lake Ramsar site and Bush Forever area poses risks to biodiversity and wetland health. • There has been limited monitoring and evaluation of the impacts on fauna including threatened species of Black Cockatoos. • Increased heavy vehicle traffic on Rowley Rd and Kargotich Rd may lead to noise pollution and risk pedestrian and cyclist safety. There needs to be greater emphasis on fire resistant vegetation and safety management as the area is classified as Bushfire Prone. Buffer zones should be expanded to 100 metres and supported by third-party ecological assessments. Develop and publicly share active transport plans to ensure pedestrian and cyclist safety. Provide regular updates to community on environmental monitoring and management plans.	See response to Submission 6 above.
21	Object	• The current industrial area emits a massive amount of light pollution and is impacting nocturnal wildlife in the area and residential areas close to the lake. • Expanding the industrial area will increase the impact on nearby residents and wildlife.	See responses to submissions 3 and 6 above.
22	Object	No comments.	Noted.
23	Object	• Has anyone in government spent any time at Forrestdale Lake? • Has any of the assessors walked around the lake and seen how much wildlife will be affected and killed?	See response to Submission 6 above.
24	Object	• Has any consideration been given to preserving our remaining natural habitats? • We need to prioritise the protection of green spaces that serve as refuges for local wildlife.	See response to Submission 6 above.

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		• City should consider revegetation initiatives and conservation rather than allowing them to be taken over by industrial expansion.	
25	Object	• Leave wildlife and birds should be able to still live freely in parts of Perth rather than killing them off or moving them on. • There are other places where an industrial area could go.	
26	Object	• Blair Road is narrow and has not been designed for regular traffic use. 2 cars passing both have wheels on verge. • Main Roads should be requested to review the width of the road, speed limits, road quality for increased traffic volumes, installation of sign for "local traffic only". • Lots of livestock on properties on Blair Road so high risk of incidents. • Increased road traffic is already occurring on Blair Road as it is being used as a shortcut to/from Nicholson Road. • Need Police monitoring of speeding on Blair Road. • There are large overhanging trees along Blair Road that are a risk to trucks. • Semi-trailer access on Blair Road should be restricted.	See response to submission 2 above.
27	Object	• The impact this would have on wildlife would be devastating	See response to Submission 6 above.
28	Object	• Blair Road is a quiet street with many horse properties and people ride their horse on the road to get to bridle trails. • Increased traffic on the road will result in more horse/vehicle related incidents. • Signs should put up at the entrances to Blair Road saying "No Thoroughfare, No Trucks, Local Residents Only".	See response to submission 2 above.
29	Object	• This valuable wetland is suffering enough. No more development.	See response to Submission 6 above.
30	Object	• Concerned about the flow of traffic to this area, especially large trucks that will use Kargotich Road as a rat run. The proposed roundabout will only encourage this. • The traffic should be diverted to Tonkin Highway rather than through a residential area with bridle trails.	The roundabout at the intersection of Rowley and Kargotich Road was approved as part of the Stage 1 development. The location was determined by Main Roads WA.
31	Object	• Concerned about wildlife safety in the area. There is an increase in Kangaroos in Forrestdale townsite due to relocations from the Anstey Keane development area. • With more development in the area more wildlife will be pushed into the townsite area. • Nocturnal animals in the area are being affected by light pollution from businesses in stage 1 of Doobarda.	See responses to Submissions 3 and 6 above.
32	Object	• Concerned about wildlife safety in the area.	See response to Submission 6 above.

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		• If this gets approved it is madness.	
33	Object	• This development will cause irreparable damage to the environment and wildlife currently residing there. • Forrestdale Lake is supposedly an "A" Class reserve but it will not remain that way with industrial development next door. • Excessive noise and pollution will be generated by the development which will impact the peace currently enjoyed by residents. • This development should be relocated elsewhere.	See response to Submission 6 above.
34	Support	• Fully supports the development of an industrial business park as it presents significant opportunities for economic growth and benefits the surrounding community, • This will attract new businesses, create job opportunities and stimulate local investment.	Noted.
35	Object	• Objects to this area being located so close to Forrestdale Lake because it will have a negative effect on the wildlife. • A lot of wildlife live in the area currently and will be pushed out into the Forrestdale townsite from rural and other areas.	See response to Submission 6 above.
36	Object	• Destruction of land, interruption, death and destruction to native animals. Ruining the semi-rural aspect of Forrestdale.	See response to Submission 6 above.
37	Object	• Disturbing our wildlife and bushland.	See response to Submission 6 above.
38	Object	• Bright lights burning all night that affect the nocturnal animals in the area. Increased urbanisation will further disrupt the hydrology of the lake and bushland around it and expose vulnerable wildlife of this RAMSAR listed class A nature reserve to vehicles, barbed wire fences and pollution.	See responses to Submissions 3 and 6 above.
39	Object	The proposed area is directly adjacent to the Forrestdale Lake Nature Reserve and Bush Forever site 345. Forestdale Lake is a recognised RAMSAR wetland of international importance which is protected under federal legislation. The area is also culturally significant to first nations peoples and should also be considered in any protection of the lake and supporting bushlands. The following matters should be considered as part of this development to assist in retaining and protecting the environmental values of Forrestdale Lake. These being: 1. **Urban Forest Strategy** - The City of Armadale promotes the Urban Forest Strategy to protect/ maintain and increase as many trees and cover within the City. We recommend this should be applied on site with broad scale clearing not undertaken rather selective plots establish with remnant vegetation retained. Particularly on the boundary of	The environmental values of the Forrestdale Lake have been considered by previous planning exercises which rezoned the site to facilitate industrial development, provided a buffer to the north and west included the requirement for the buffer to be managed via a buffer management plan. 1. Vegetation within buffers will be retained and rehabilitated as per the Buffer Management Plan. 2. All industrial traffic will enter the site from Rowley Road via stage 1 or stage 2. Stirling Road and Oxley Road are existing road reservations and will not be part of the RAV network. 3. About 50 groundwater monitoring bores have been installed across Stages 1 & 2 to assess groundwater variations within the area. Groundwater levels and contours from

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		Forrestdale Lake Nature Reserve is large stands of native vegetation that would assist in both the Urban Forest Strategy and buffering for the reserve. 2. **Access** - In considering access to the site and avoiding impacts to the Forrestdale Lake all access should be undertaken from Tonkin Highway and Rowley Road. As these are existing are established routes. Oxley Road and Stirling Road are currently present but any initial traffic to these roads would impact wildlife within the region. Additionally, Oxley Road (west) is currently a cul-de-sac and if built through will fragment the reserve further creating additional impacts to the reserve and fauna. Ideally Stirling Road should be re-routed around the reserve portions (along Tonkin Highway edge) or as a minimum restrict use to local traffic (residence) only. 3. **Hydrology** –the underground hydrology of the region runs from south of Forrestdale Lake north through the township towards Southern River. The area is very low lying and retains significant surface water. In the development of the industrial park (stage 2) water captured needs to be managed to reduce any risks from pollutants and or nutrient overloads into ground water that will affect the RAMSAR wetland of Forrestdale Lake. A wetland should be created onsite to capture and retain water received, this will assist in maintaining the ground water level which will assist in Forrestdale Lake water retention. As part of the wetland a nutrient stripping basin should be developed to assist in this process. 4. **Buffer** - The current plan location identifies the allotment sitting directly adjacent to the Forrestdale Lake Nature Reserve. Buffers/protection zones need to be created along this boundary to reduce any impacts from the industrial park and allow the natural functions of the reserve to continue. 5. **Fencing** – There are regular incursions and vandalism of fencing and infrastructure in Forrestdale Lake Nature Reserve from development once public are allowed access. Appropriate fencing and management is required to reduce these impacts. Too often poor or unreliable fencing is used and is just not suitable in keeping undesirables out. 6. **Lighting** – With continued development in the region light pollution may impact on the values of Forrestdale Lake Nature Reserve. Light pollution is known to have impact on	monitoring since 2012 indicate groundwater flow direction is generally away from the Lake, except for the NW corner. Post development stormwater strategy is consistent with pre-development and conveys water south to Rowley Rd, away from the Lake. Stage 2 stormwater is detained prior to discharge to the existing wetland in Stage 1, consistent with pre-development. All stormwater is treated via vegetated detention areas, in accordance with current best management practice to achieve water sensitive urban design. 4. Buffers are proposed as part of the structure plan in accordance with the MRS boundaries and planning outcomes through the MRS amendment process. 5. Fencing can be detailed as needed at subsequent stages of development. 6. Noted and will be managed at subsequent stages of development. 7. Lighting can be managed at development application stage in accordance with Australian standards

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		nocturnal species such as bats, invertebrates and birds. Migratory and waterbirds are known to travel at night and utilise moon reflection on water to navigate. Increased lighting will affect their navigation. Guidance needs to be provided for light shielding reducing light pollution. 7. **Noise** – Noise pollution is known to impact on avian fauna communications. Noise reduction measures need to be put in place for industries close to the lake that may have elevated noise. The creation of sufficiently wide buffers will assist in the management of noise.	
40	Object	The impact to the lake and interference with wildlife at the lake and their ability to be uninterrupted and disturbed by further urban sprawl. We have to protect our natural habitats.	See responses to Submissions 3 and 6 above.
41	Object	Stop destroying Forrestdale and the nature around it. Forrestdale Lake plays a big part for native birds and breeding and its wildlife. This will have a big impact on that.	See responses to Submissions 3 and 6 above.
42	Object	Sad to think you are even considering building an industrial area so close to lake and wetlands. Our kangaroos, swans, birds and so much more are losing their homes, and the light pollution will affect nocturnal animals. These wetlands are not supposed to be built on and are of national importance. Concerned about the quality and quantity of water that will run off into the lake.	See responses to Submissions 3 and 6 above.
43	Object	This will ruin the reserve and expose vulnerable wildlife to vehicles, wire fences and pollution.	See responses to Submissions 3 and 6 above.
44	Object	The light pollution from this alone will have a detrimental impact on the nocturnal animals living in and around the wetland. The impact to water quality in the wetland could be huge. There are many species of fauna that rely on Forrestdale Lake and they could be put at risk.	See responses to Submissions 3 and 6 above.
45	Object	Forrestdale Lake is sacred land. It is a beautiful habitat and a breeding ground for animal species all over the world. It is one of the last area these poor animals have to go. The ever-encroaching industrial parks are out of control. Is nothing worth protecting anymore?	See responses to Submissions 3 and 6 above.
46	Object	Objects to industrial development next to Forrestdale Lake due to the adverse impact on the lake's wildlife and in particular the Black Swan population.	See responses to Submissions 3 and 6 above.
47	Object	Has lived in Forrestdale for over 50 years. City of Armadale has always considered Forrestdale Lake a sensitive area and has worked with environmental groups to protect the area. Now City's concerns only seem to be about money grabbing in this wetland area. Council is pulling in masses of extra income	See responses to Submissions 3 and 6 above.

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		through all the land development but are not putting anything back into the community. Roads are a disgrace with no curbs or drainage in Forrestdale townsite and long waits to get out of townsite onto Armadale Road due to the massive increase in traffic caused by all the residential development. Now there is a massive industrial area being built and expanded on the edge of the lake. Armadale City Council is ignoring the plight of the wildlife as well as people who live in the area.	
48	Object	Objects to development as it is too close to Forrestdale Lake which is an A Class nature reserve and RAMSAR wetland. This wetland is home to many threatened plants and animals, is a stopover point for migratory birds and an important refuge and breeding ground for over 70 waterbird species. The lake is seasonal but records show it is drying out much earlier than it did 30 years ago as urban development, bore water usage, climate change and decreased rainfall impact groundwater levels. This means wildlife are increasingly exposed to fox and pet predation as well as starvation and disease. We need to stop developments from disrupting wetland hydrology or we will lose the wildlife that relies on them	See responses to Submissions 3 and 6 above.
49	Object	• Hydrology – the underground hydrology that runs to Forrestdale townsite and feeds the groundwater infill to the lake comes from south of the lake and if not properly managed will affect water quality. Even Stage 1 hasn't been managed properly with cess pool water sitting at present. • No discussion has been had with Friends of Forrestdale. • Oxley Road is currently a dead end but if extended to Nicholson Road will further fragment the reserve. • Stirling Road currently cuts through the reserve and results in vehicle impacts on wildlife already without it becoming an access point to the industrial area. • The plan shows the industrial area butting directly against the lake. There should be a green zone between the two. • Nocturnal animals will be affected by bright lights.	• A Local Water Management Strategy has been prepared for the industrial area and its primary objective is to align pre and post development water flow in the area and water quality. • Friends of Forrestdale lodged a detailed submission with the City on the proposal. • Oxley Road is not proposed to be constructed through to Nicholson Road. • Stirling Road is not intended to provide a primary access point to or from the industrial area. Primary access to the industrial area is via Rowley Road. Stirling Road is not rated for heavy vehicle movements as it is classified as a Local Road. • There is a 50 metre wide buffer zone between the industrial area and Oxley Road. • Conditions placed on Development Approvals for businesses in the industrial area can require light spill to be contained to the industrial properties and be hooded and oriented inwards.
50	Object	Building an industrial area in an environmentally sensitive area would have irreversible and detrimental consequences for wildlife. Forrestdale Lake serves as a vital ecological asset supporting both plant and animal species. The disruption of the natural environment would not only harm local biodiversity but also affect water quality which would have far reaching consequences on the local ecosystem and the surrounding community. There are also significant concerns regarding traffic	See responses to Submissions 3 and 6 above.

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		congestion, noise pollution and visual impact of the industrial area. The industrialisation of such a scenic area could reduce property values and negatively affect quality of life.	
52	Object	The proximity of the industrial area to Forrestdale Lake RAMSAR site and Bush Forever areas poses risks to biodiversity and the integrity of the critical wetland ecosystem. The inclusion of buffer zones is commendable but they should be at least 100 metres wide to provide adequate protection. Groundwater and stormwater management are critical issues for this development. The Local Water Management Strategy needs to contain stronger contingency plans to address extreme weather events and long term climate change impacts. The anticipated increase in heavy vehicle traffic along Rowley Road and Kargotich Road raises concerns about road safety, noise pollution and pedestrian and cyclist access. Detailed plans for active transport infrastructure should be included. Recommends the inclusion of a Bush Fire Management Plan.	See responses to Submissions 3 and 6 above.
53	Support	Owner of Lot 7 Oxley Road within Stage 2 and owners of Stage 1. The proposed lot layout shown on the structure plan for Stage 2 does not fit this landowner's proposed layout for Lot 7. Applicant for Stage 2 has confirmed that the structure plan can be updated to fit the landowner's proposed layout. The proposed LWMS for Stage 2 appears consistent with the LWMS and UWMP prepared for Stage 1. Future development of UWMP for stage 2 will require further consultation with owners of Stage 1.	The points raised in the submission are noted and have been provided to the applicant for stage 2 to enable continued negotiation and liaison between the developers of the 2 stages. The City encourages landowners to work together and resolve any outstanding matters.
54	Object	Opposed to the proposed industrial area as it is too close to a wetland of international importance. This planning is inconsiderate to the wildlife and once quiet community. Development of the industrial area will push snakes and kangaroos towards the school and neighbouring houses.	See responses to Submissions 3 and 6 above.
55	Object	Will all the wildlife that uses the lake be rehomed? What happens to the wetland once development is completed. The development is too close to the lake.	See responses to Submissions 3 and 6 above.
56.	Object	The submitter has raised the following concerns about the proposed industrial area: 1. The appropriateness of development in an area that is entirely sumpland, palusplain and wetland (UFI 15797) / hydrology for the following reasons:	1. Post development groundwater and surface water strategy is designed to effectively limit and manage any groundwater rise. Nutrient runoff to Forrestdale Lake will not occur as all stormwater is conveyed south to Rowley Rd, away from the Lake. Sand fill will be required to achieve required separation to groundwater and satisfy sewer and structural requirements. Dewatering will occur consistent with procedures and protocols of a Dewatering Management Plan.

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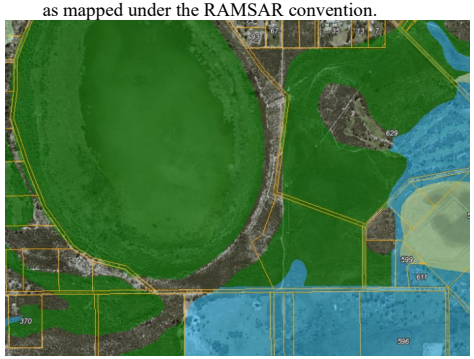
		• other developments in high water table areas with a clay layer have led to flooding. • there is potential for nutrient runoff into Forrestdale Lake. • Metres of sand fill are required and possibly dewatering of the land. • PGV's document (page 12) states '*Forrestdale Lake is not downstream from the proposed development area as the groundwater flows to the south-west.'* However, the UBC understands that underground water flows from south of Forrestdale Lake north towards Southern River. 2. Buffer to Bush Forever site 345, including Forrestdale Lake, not adequate for the following reasons: • The north-west corner of the Stage 2 proposal intercepts the sumpland and palusplain associated with Bush Forever site 345. • PGV states on page 17 that '*The site is over 200m to the south of the RAMSAR listed Forrestdale Lake'*. However the buffer to the north to Oxley Road (adjacent to Bush Forever 345) is 50 metres wide. (see CLE Town Planning plus Design Plan A). The narrowest buffer on the west side of Lot 9 is 20 m wide. Buffers must protect values of Bush Forever site 345 and. must be greater than buffers around areas of lesser importance than Forrestdale Lake and its bushland. • Buffers adjacent to RAMSAR wetlands should be increased. • Buffers should be measured '*from the outer edge of wetland-dependent vegetation for nutrient inputs, as excessive nutrients will adversely affect both the wetland dependent vegetation and the open-water habitat*.' (Peter M. Davies and J. A. K. Lane. Guidelines for Design of Effective Buffers for Wetlands on the Swan Coastal Plain 1995). 3. Oxley Road, if connected, would fragment the bushland. 4. Light and noise pollution will affect the bushland/conservation areas, if plan is implemented as follows:	The Perth Groundwater Map shows groundwater flowing to the southwest. About 50 groundwater monitoring bores have been installed across Stages 1 & 2 to assess groundwater variations within the area. Groundwater levels and contours from monitoring since 2012 indicate groundwater flow direction is generally away from the Lake, except for the NW corner. 2. All Conservation Category Wetlands have a 50m buffer as shown in the Structure Plan. The Structure Plan maintains a 200m buffer to Forestdale Lake (UFI 2479). The submission refers to a Conservation Category portion of the Armadale Palusplain (UFI 7383) which is separate from the RAMSAR wetland and the 50m buffer meets the CCW buffer requirements. There are no buffers required to Bush Forever sites. The buffer to the RAMSAR wetland as mapped is 200m. The buffer is mapped from the outer edge of the wetland as mapped under the RAMSAR convention.  3. Oxley Road is an existing road reservation, however, is not proposed to be connected to the Stage 2 Structure Plan west of Stirling Road. 4. Light pollution is considered in Section 4.5 of the Buffer Management Plan which states that best practice measures as described in the *Control of Obtrusive Effects of Outdoor Lighting AS4282-2023* (Standards Australia, 2023) will be employed.

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		• Impact on invertebrates and migratory animals. Moths are primary nocturnal pollinators of native flora. They are attracted to lights and become attractants for predators (birds, bats, spiders) (David Knowles – Spineless Wonders). • Many shorebirds avoid feeding at sites with artificial light and both light and noise pollution reduces birds' sleep quality. • An essential component of the diet of waterbirds is macroinvertebrates, so developments around Bush Forever site 345 could have critical consequences when various forms of pollution impact animals. 5. There should not be a blanket clearing of stage 2 and tree retention should be prioritised, in particular Marri trees.	As per any industrial development, noise will be required to be considered for individual developments in the Structure Plan area and maintained at acceptable levels at individual property boundaries. 5. The site is mostly cleared having historically been used for rural purposes. Earthworks and fill will be required to provide separation to groundwater and for servicing. Where possible trees may be retained in POS and drainage areas subject to earthworks.

Local Government Schedule of Modifications – Doobarda Industrial Business Park Stage 2

Issue/Section Reference	LG Modification	Justification
1. Structure Plan Report Part 1 Implementation	1. Include provision requiring retention of existing group of Marri trees and modify structure plan layout accordingly to accommodate this in a future Public Open Space area. 2. Reference to "acquisition" of the road widening for Rowley Road should be removed from section 4.2.6 (page 10 of the applicant's Structure Plan Report Part 1 Implementation. 3. Remove the wording reference to "Any additional upgrades" from Section 4.2.8 4. Section 4.2.8 (i) to be modified to require any proposed development under the powerlines to also be to the satisfaction of the City. 5. Section 4.2.9 of the applicant's Structure Plan Report Part 1 Implementation states that a DCP will be required for the provision of infrastructure shared by Stage 1 and Stage 2 for: • Distributor Roads; • Rowley Road widening and upgrades; • Rowley Road intersections; and • Service infrastructure. 6. Provision/s to be included in the Structure Plan requiring the developer to modify the road pavement threshold to Blair Road such that the movement of large vehicles into Blair Road is discouraged. This could include threshold treatments that modify the alignment of Blair Road at the intersection (chicanes), raised	1. The Marri trees have been identified in the applicant's EIA as potentially suitable for habitat and foraging for Carnaby cockatoo in the area. 2. As occurred with Stage 1 (WAPC imposed condition of Subdivision Approval), this land will be required to be ceded free of cost. The western portion of the land can't be developed unless the new road intersections are constructed by the subdivider. 3. The subdivider will be responsible for the initial road upgrades and dedication of road widening/access similar to Stage 1. 4. The City will be required to manage any infrastructure developed under the powerlines such as drainage infrastructure and Public Open Space so any works in easement should be to satisfaction of City. 5. A DCP is not required by the City. Funding of and recouping costs for the above items should be by via private agreements between the owners of stages 1 and 2. Services are the responsibility of the landowners and State Government agencies and not a DCP administrated by local government. The City has advised for over 10 years that it will not be managing a DCP for this infrastructure. 6. It is appropriate to discourage large vehicles (in particular) from using Blair Road, which is a local road in a rural living area, as a shortcut from Rowley Road to Nicholson Road. 7. The vegetation (including buffers and drainage areas) needs to be designed and managed for environmental purposes and nutrient stripping requirements, therefore the wording of Section 4.2.4 needs to be amended. See also BMP changes below. 8. See report for matters to be considered, including consultation required with DBCA as per the Scheme Provision. **Structure Plan Map** 1. Local road south of Lot 5066 not supported due to remnant vegetation of Beermullah Complex identified as a high priority for

Issue/Section Reference	LG Modification	Justification
	platform just past entrance to Blair Road and the installation of "Local Traffic Only" signs. 7. Remove "management of vegetation in a low threat standard" – section 4.2.4. 8. Section 4.2.7 – the Buffer Management Plan should be referred to as a "draft", as DBCA and the City have not approved the current version. Structure Plan Map: 1. Move proposed local road south of Lot 5066 to within boundary of Lot 5066. 2. Include text requiring closure of existing unconstructed Road reserves south and east of Lot 5066 and conversion of the reserves to POS. Opportunities for tree retention should be considered, outside buffer areas. 3. Remove local road connection from industrial area to Stirling Road/Oxley Road. 4. Correctly identify portion of Oxley Road west of Stirling Road intersection as unconstructed and delete from the Structure Plan.	retention in City of Armadale Biodiversity Strategy 2024-2029. Vegetation to be retained. 2. Existing unconstructed road reserves can be closed and reserves converted to POS. Street trees and vegetation on Kargotich Road are to be retained and protected in accordance with AS4970. 3. Stirling Road is an unsealed local road that provides access for four Rural Living zoned properties (via Oxley Road and Stirling Road) north to Forrest Road. Stirling Road and Oxley Road will not be upgraded or sealed by the developers of Stage 2 as these roads are outside the structure plan area, are not a designated heavy vehicle route and, the City at this time does not have any intention to seal these roads. More importantly, Forrest Road to the north goes through a future urban area that has been rezoned to Urban under the Metropolitan Region Scheme and with a local scheme amendment (Amendment 127 to TPS 4) in progress to rezone the area to the Urban Development zone to allow residential subdivision. This future urban area will accommodate approximately 600 dwellings. It would not be appropriate to enable vehicle access from the industrial area to Stirling Road, Forrest Road through to Armadale Road and create safety issues within the future residential area. All heavy vehicle traffic needs to use the designated heavy vehicles routes of Rowley Road, Tonkin Highway and Nicholson Road to access Armadale Road. 4. Oxley Road west of Stirling Road is unconstructed and should be identified as such on the Structure Plan map. This appears to be a drafting error by the consultants, as they have no intention of constructing the road and any works would require environmental approvals and substantial clearing.
2. Structure Plan Report Part 2 Explanatory	1. Page 22 and 30 - removal of vegetation in unconstructed road reserves to the south and east of Lot 5066 not supported – Modify text.	1. See above.

Issue/Section Reference	LG Modification	Justification
3. Local Water Management Strategy	**1.** Page 16 Wetlands - Amend LWMS to correctly identify wetlands. Lot 12 contains CCW (UFI13536, 13085, 15198, 1519,12993) and REW (UFI 15943). Amend LWMS to identify wetlands. Update LWMS to include reference to DBCA report on the modification of wetland boundary for CCW north of Oxley Road.	1. Table 1 of the LWMS states that: *There are no wetlands or associated buffers within the development area.* However, it is noted that the buffer to REW (UFI 15796) does impact Lot 10 within this Stage. 2. The LWMS will be referred to DWER at each planning stage until approved.
2. Buffer Management Plan	1. Buffer Management – Modify - The City does not accept firebreaks inside buffer areas. 5.1 Clearing Actions - to include no storage of materials, machinery etc. in accordance with AS4970, within vegetation / tree protection zones. 2. 6.4.3 Density - note that planting density should reflect the City's completion criteria and planting density should accommodate for losses. 3. Management action to include preparation of a fauna protection and management plan, approved by the City and implemented during all works. 5.4 Fauna Habitat - to include reference to Fauna Management. 4. Applicant to consult with DBCA to revise Buffer Management Plan to confirm required width and depth of buffers as per DBCA submission and include reference to DBCA report attached to their submission.	1. Buffer areas to be revegetated and not to be used for battering of roads, firebreaks etc. Firebreaks to be inside industrial properties abutting fenceline of buffer areas. 2. Planting density to be subject to the approval of the City 3. Several species of fauna are extant in the Structure Plan area including Quendas and Kangaroos. 4. Schedule 8 of TPS provision 46.3 (b) requires Buffer Management Plan to be prepared in consultation with DBCA and LG. Applicant has confirmed that this consultation did not occur during preparation of the Buffer Management Plan.
3. Bushfire Management Plan	**1.** Require revision of BMP in accordance with comments provided by DFES in their submission and that drainage and POS areas will not be developed as "low threat vegetation" as they need to fulfill drainage nutrient stripping, amenity and include trees and vegetation. **2.** The BMP should reflect the final intent of the site. Buffer areas identified for revegetation to reflect a forest classification unmanaged. Tree retention and	**1.** The City does not accept the maintenance obligation and risk associated with maintaining POS to 'low threat'. If the swales were grassed as specified in the BMP then maintaining grass heights in drainage swales to 100mm height would be too onerous a management requirement for the City as well. The City will require vegetated drainage swales and basins for nutrient stripping and environmental improvement and will not accept management of extensive grassed swales with a requirement for 100mm grass maintenance for BAL ratings.

Issue/Section Reference	LG Modification	Justification
	revegetation within proposed POS, drainage basins and streetscapes should be prioritised with appropriate APZ's and BAL ratings to reflect vegetation in the landscape. "Rural" and/or low fuel vegetation recommendations are not supported. **3.** Table 4 – modify to acknowledge the CCW and REW present on Lot 12. **4.** Remove Stirling Road from evacuation route as direct road connection from industrial area to future residential area in Forrestdale Townsite East is not supported.	**2.** Drainage basins need to be vegetated with appropriate nutrient stripping native vegetation. The use of grass only in drainage basins is not supported by the City and the City would not accept management of such basins or manage the grass to a height of 100mm in an industrial area. BAL classifications will need to be updated to reflect the vegetation required by the City in Drainage basins. There is conflict between what the LWMS says about vegetation in drainage basins (Nutrient stripping native vegetation) and what the BMP says (grassed only). Page 9, 4.2.4 of Structure Plan Report Part 1 Implementation states: *A Bushfire Management Plan (BMP) is included as Appendix 5 to the Structure plan which outlines management measures for the development of land including separation of habitable buildings from areas identified as BAL-40 and above,* ***management of vegetation in a low threat standard****, the provision of two vehicle access points and the provision of a water supply and associated infrastructure.* The BMP states: Page i - *As a result of the development the existing vegetation is expected to be modified as follows: d) Revegetation of the drainage compensation basins (for flood control) with grassland vegetation.* Page 34 - *6) Grass should be maintained at a height of 100 millimetres or less, at all times. Wherever possible, perennial grasses should be used and well-hydrated with regular application of wetting agents and efficient irrigation.* This is not consistent with the Local Water Management Strategy which states:

Issue/Section Reference	LG Modification	Justification
		• *Use of local native vegetation species in swales, drainage management areas and streetscapes to reduce nutrient input and conserve water resources.* (page 9); and • *Drainage areas have separate bio-retention areas (BRAs), with native plants selected for nutrient stripping, consistent with Monash University (2014). (Page 25 section 8.1).* It is recommended that a review of all the documents lodged with the Structure Plan be undertaken to ensure consistency between recommendations and proposals contained in each document. The City will require vegetated drainage swales and basins for nutrient stripping and environmental improvement and will not accept management of extensive grassed swales with a requirement for 100mm grass maintenance for BAL ratings **3.** There will be a 50m public open space buffer within to the CCW and Bush Forever site 345 and a 30m revegetated buffer to the adjacent wetland within Lot 8 (Stage 1). Lot 12 should be revegetated to include the entire buffer and lot. Figure 8 - modified vegetation classification. The City is not supportive of grassland classification and the BMP should reflect the final intent of the site. **4.** Stirling Road is required to be removed due to potential conflicts between industrial traffic and future residential areas. See report for detailed reasons.
4. Environmental Assessment	**1.** 3.5.3 Vegetation Complexes – identify that Beermullah Complex is a high priority for retention as per the City's Biodiversity Strategy. Identify that vegetation in the unconstructed road reserve south of Lot 5066 and west of Lot 10 to be retained and protected. **2.** 3.6.2 Conservation Significant Species - Small stand of Marri trees to be considered for retention. **3.** 5.2 Conclusion – Include requirement for tree management, retained vegetation to be protected in accordance with AS4970.	**1.** The City has an expectation of tree retention and places strong emphasis on avoidance of impact. **2.** The Marri trees have been identified in the applicant's EIA as potentially suitable for habitat and foraging for Carnaby cockatoo in the area. **3.** DBCA are requesting additional buffer width when the buffer widths were already determined at the time of the Metropolitan Region Scheme Amendment where the buffer areas were left in the Rural zone. **4.** Schedule 8 of TPS provision 46.3 (b) requires Buffer Management Plan to be prepared in consultation with DBCA and LG. Applicant

Issue/Section Reference	LG Modification	Justification
	4. Resolution of buffer requirements for adjacent wetlands. DBCA has raised matters about a Conservation Category Wetland and the lack of consultation by the applicant's with DBCA. The applicant has not demonstrated that engagement has occurred with DBCA. The matter is still to be resolved.	has not advised that this consultation did occur during preparation of the Buffer Management Plan.
5. Engineering Servicing Report	**1.** Modify the wastewater information to identify the correct planned location of the permanent Wastewater Pump Station (WWPS) that is to service the catchment. Amend text to state that the actual location of the permanent Wastewater Pump Station (WWPS) will need to be determined during the design stage. **2.** The Report states that Rowley Rd upgrade will be addressed via a Developer Contribution Scheme. – this needs to be deleted as the developers had agreed that Rowley Rd would be upgraded without a DCP. **3.** Appendix A – remove any reference to the extension of batters for roads and other infrastructure into buffer areas. **4.** Remove reference to use of Stirling Road as an evacuation route as direct road connection from industrial area to future residential area in Forrestdale Townsite East is not supported.	**1.** The wastewater information in the Engineering Servicing Report is not correct/current. The permanent Wastewater Pump Station (WWPS) that is planned to service the catchment has now been located to the north. The actual location of the permanent Wastewater Pump Station (WWPS) will need to be determined during the design stage. **2.** The applicant has been advised a few times that there is no DCP and that the landowners will need to work together to coordinate the upgrade of Rowley Road. The provision and funding of shared infrastructure within the industrial area can be managed through private agreement between the owners of Stages 1 and 2. **3.** The City does not support batters in Wetland or Bush Forever buffers. **4.** Stirling Road is required to be removed due to potential conflicts between industrial traffic and future residential areas. The applicant is not proposing to upgrade the rural portions of the road to cater for the traffic volumes and industrial type of vehicles. See report for detailed reasons.
6. Traffic Impact Assessment	**1.** Include recommendations for the developer to modify the threshold to Blair Road such that the movement of heavy vehicles into Blair Road are discouraged. This could include threshold treatments that modify the alignment of Blair Road at the intersection (chicanes), or a raised platform just past entrance to Blair Road and the installation of "Local Traffic Only" signs. Any proposed modifications within the Blair Road reserve would	**1.** Identification in the Traffic Impact Assessment and Structure Plan Report Part 1 (Implementation) of possible traffic restriction measures that could be put in place to discourage traffic from the industrial area using Blair Road. This should also form a condition of any future subdivision application with clearance of the condition to be to the satisfaction of the Shire of Serpentine Jarrahdale as this local road is within the Shire boundary. **2.** There is currently a conflict between what Main Roads WA required from the developers of Stage 1 and what they are now asking Stage 2 developers to provide. Main Roads requesting

Issue/Section Reference	LG Modification	Justification
	have to be approved by the Shire of Serpentine Jarrahdale as they manage this local road. **2.** Resolution of Main Roads' requirements for the upgrade and extent of road widening for Rowley Road.	additional road widening among other upgrades when Main Roads WA do not have a design for the ultimate upgrade of the road and cannot provide an estimate of when this information will be available. This requirement could significantly delay development of Stage 2.
7. Other	**1.** Lodgement of a Local Landscape Feature and Tree Retention Strategy to the satisfaction of the City prior to the WAPC approving the Structure Plan. The requirements for a Local Landscape Feature and Tree Retention Strategy must be prepared in consultation with the City and include the information set out in PLN 2.4.	**1.** Non-compliance with Local Planning Policy PLN 2.4 which requires this strategy for structure plan proposals.

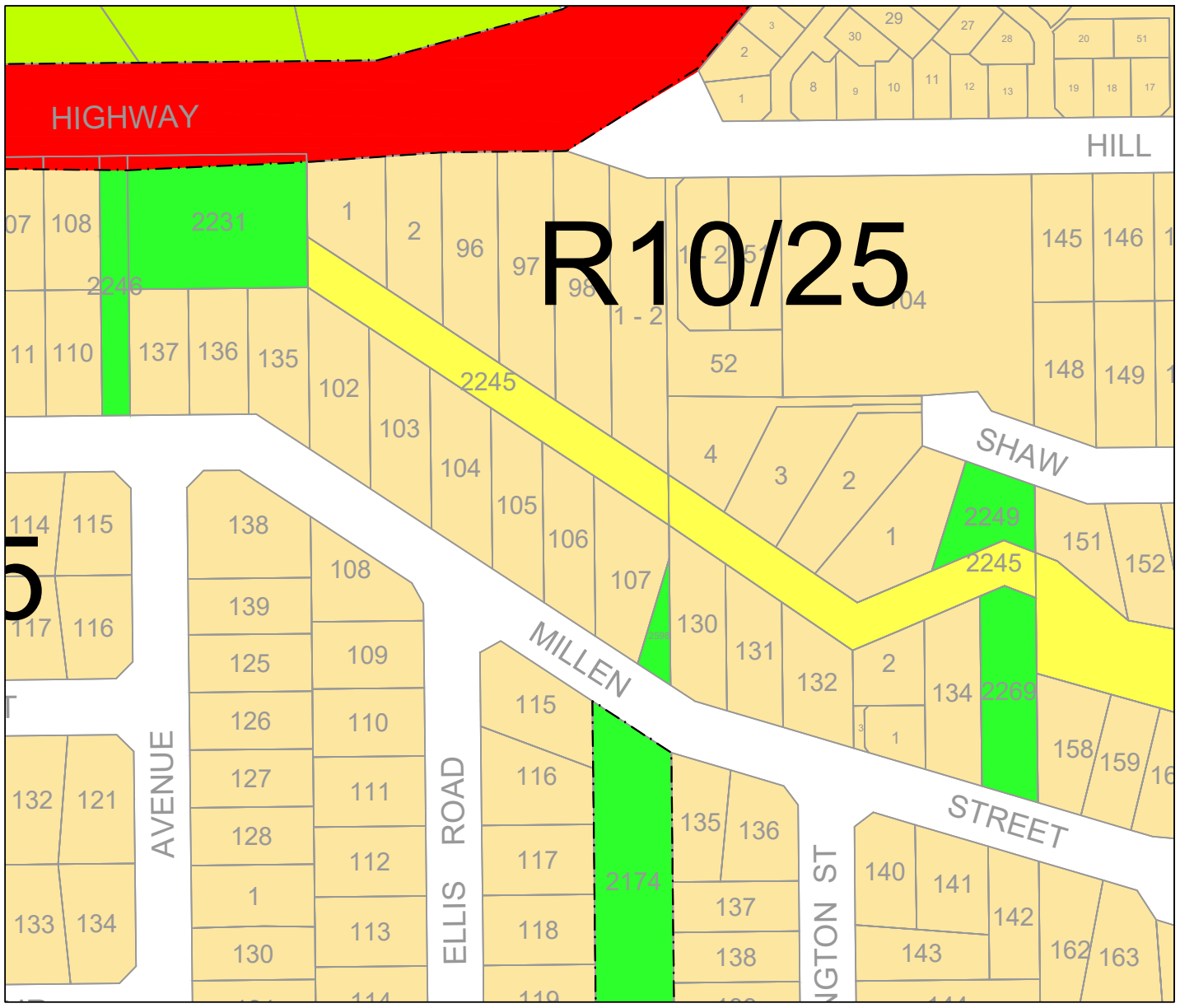
STRUCTURE PLAN

STAGE 2 DOOBARDA INDUSTRIAL BUSINESS PARK

Attachment Links for City of Armadale Engage – Public Comment closed on 28 January 2025 –*(https://engage.armadale.wa.gov.au/the-doobarda-industrial-business-park)*

1. City of Armadale Engage - Public Comment
2. Location Plan
3. Plan Map
4. Part 1 Implementation Report
5. Part 2 – Explanatory Report
6. Transport Impact Assessment
7. Local Water Management Strategy
8. Engineering Servicing Report
9. Environmental Assessment Report
10. Buffer Management Plan
11. Bushfire Management Plan

EXISTING ZONING



PROPOSED ZONING

ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
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- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE No.1
- ADDITIONAL USE No.7
- RESTRICTED USE RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
TS	Technical School
HS	High School
PS	Primary School
H	Hospital
WSD	Water Authority of WA
SU	Special Use
SEC	State Energy Commission
T	Telstra

NOTE: The reservations are shown diagrammatically and do not purport to represent the road reservations shown in the Metropolitan Region Scheme and information in respect to road widening requirements for these roads should be obtained from the Department of Planning

AMENDMENT No. 130 - Proposal 1 - Map 1
City of Armadale Town Planning Scheme No. 4

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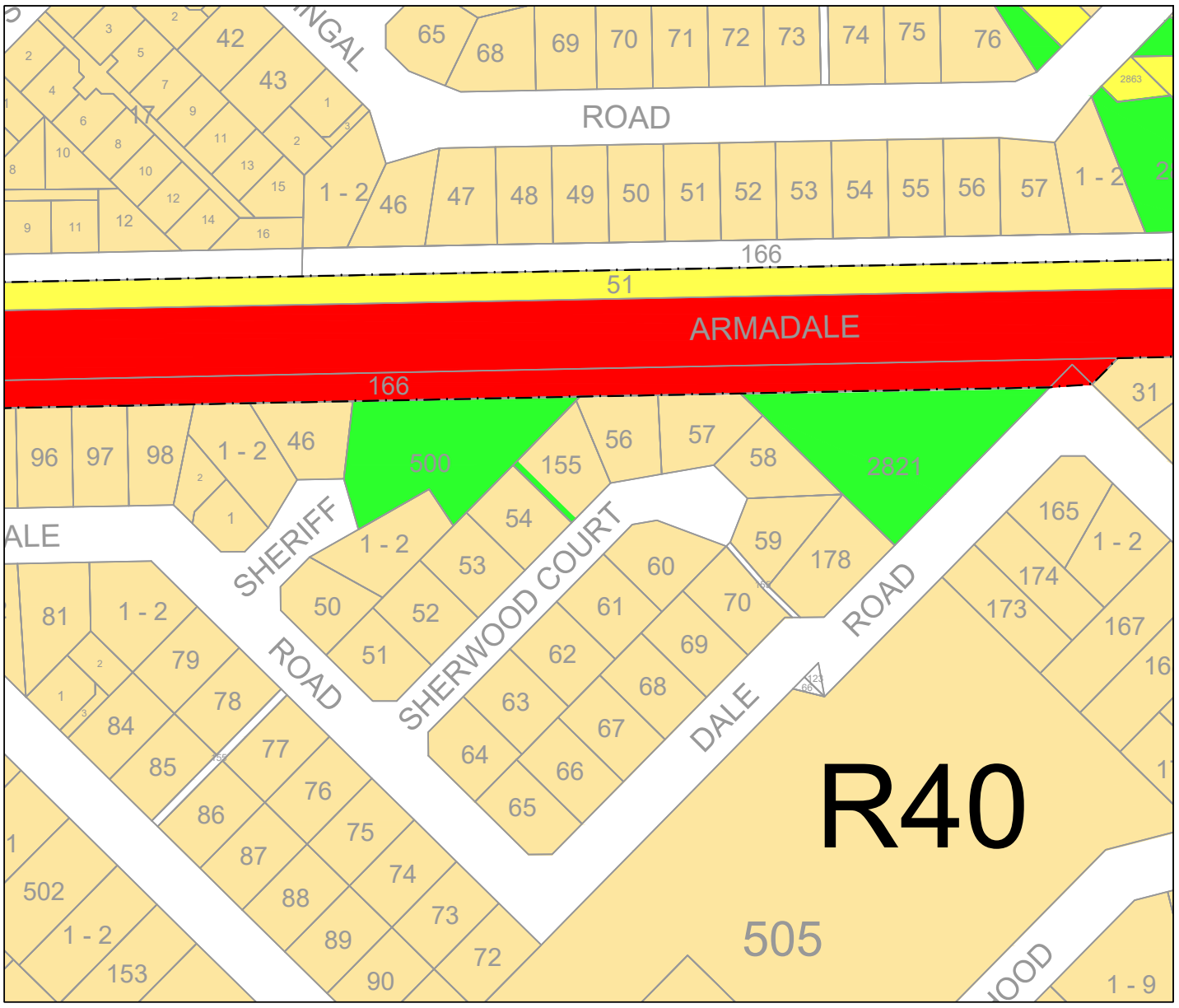
CITY OF Armadale

EXISTING ZONING



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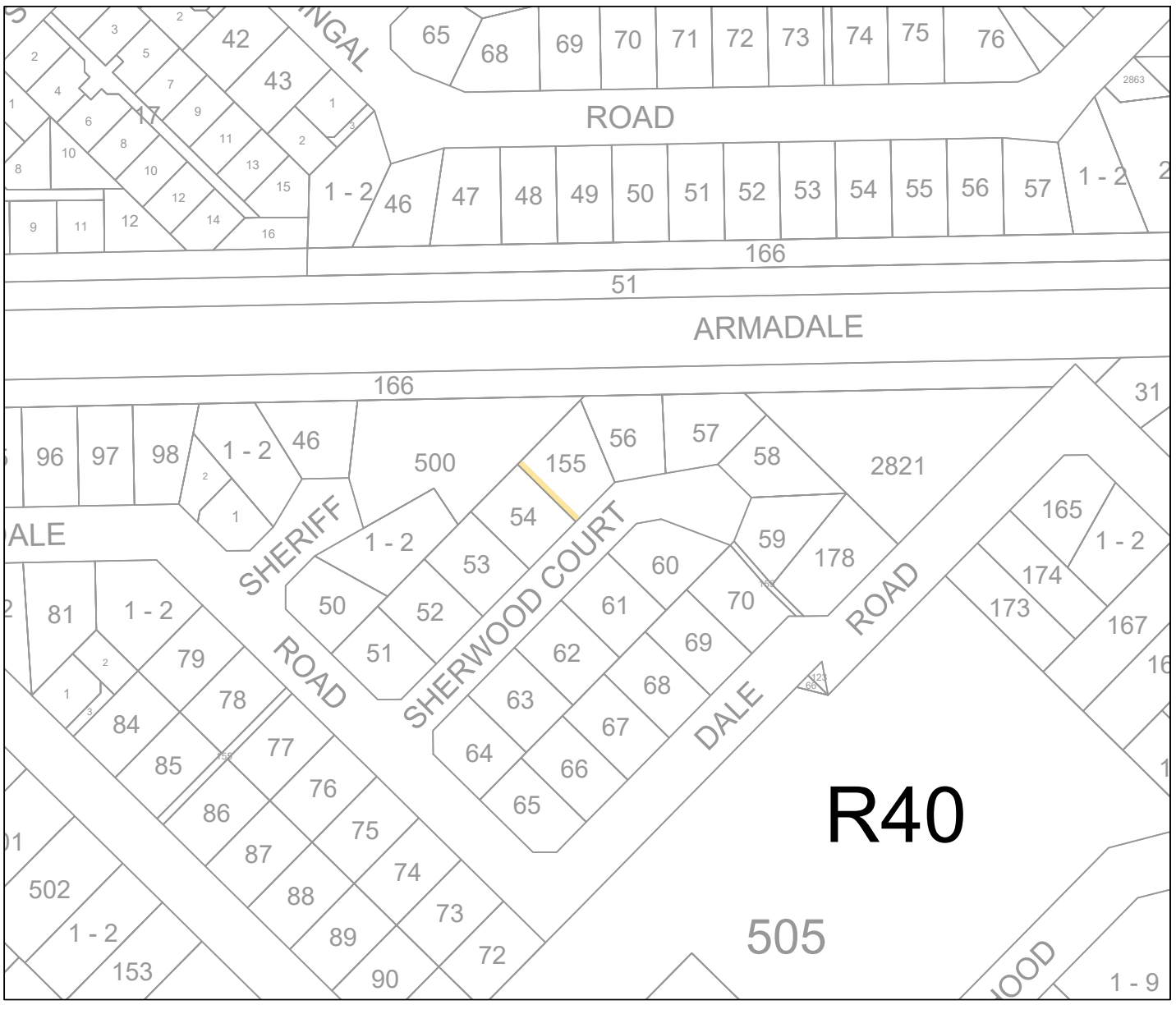

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AMENDMENT No. 130 - Proposal 1 - Map 2
City of Armadale Town Planning Scheme No. 4

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SCALE 1 : 2000

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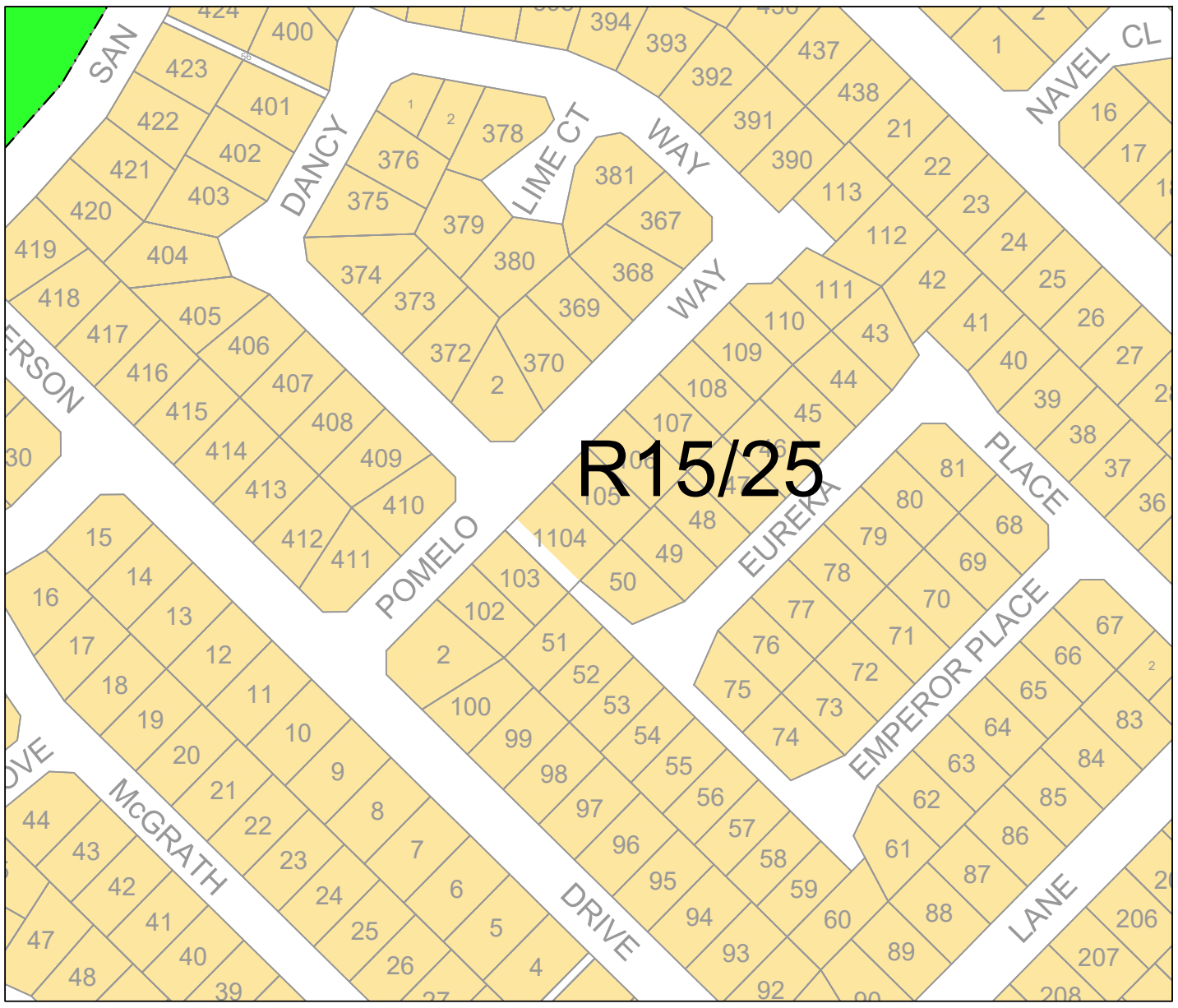
CITY OF Armadale

EXISTING ZONING



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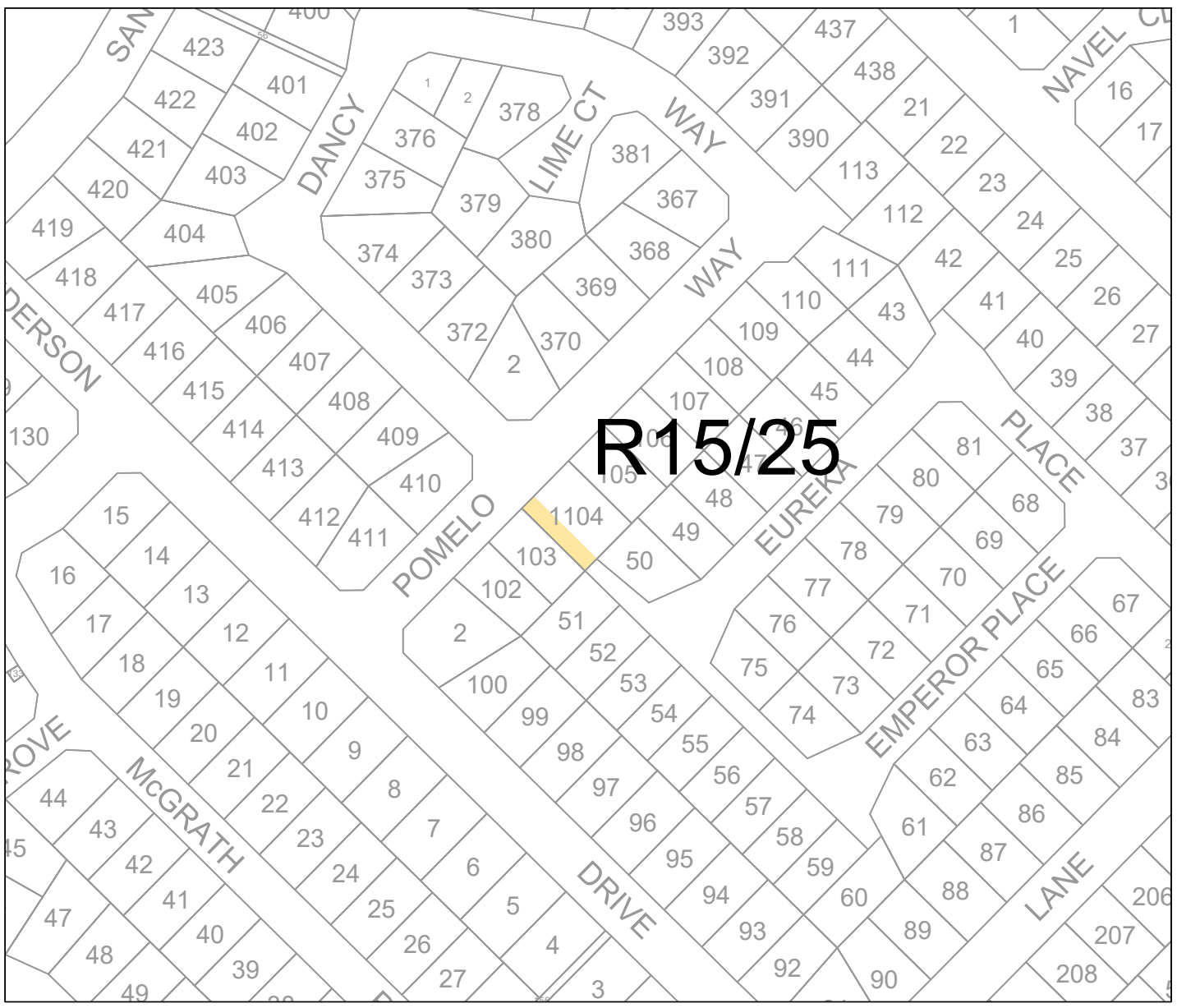

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AMENDMENT No. 130 - Proposal 1 - Map 3

City of Armadale Town Planning Scheme No. 4

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SCALE 1 : 2000

CITY OF Armadale

DATE 13 January 2026 - REVISION 2601

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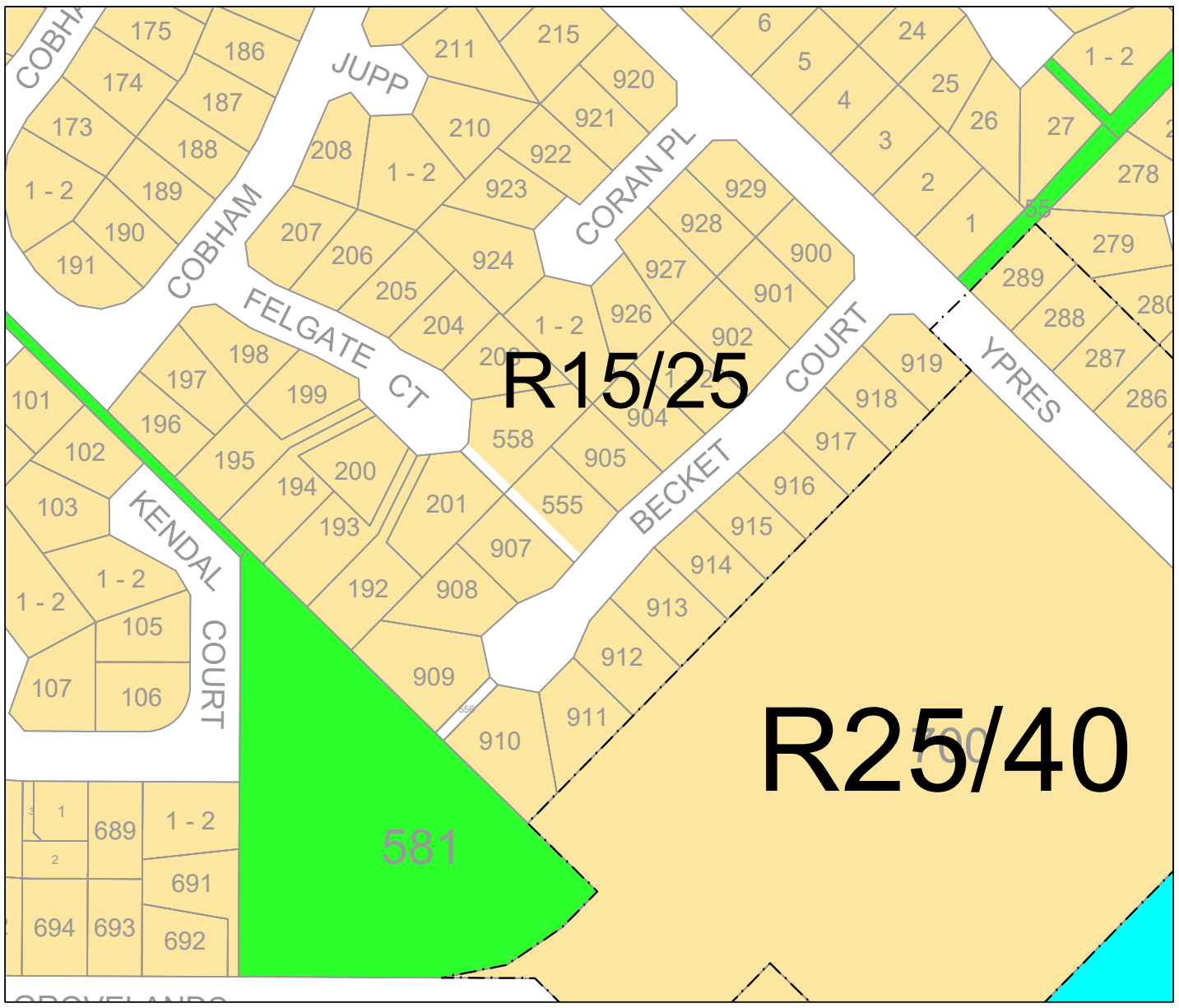

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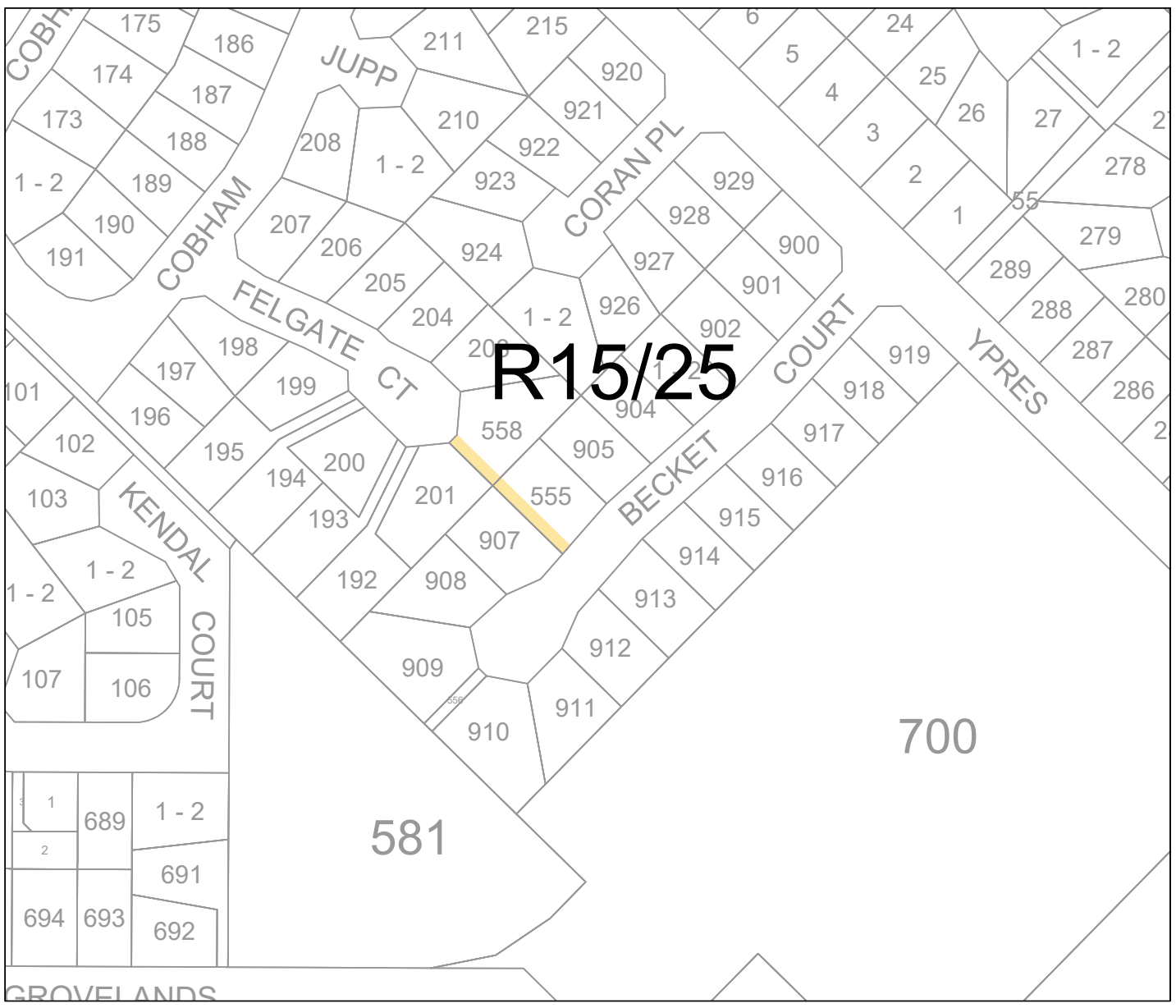

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AMENDMENT No. 130 - Proposal 1 - Map 4

City of Armadale Town Planning Scheme No. 4

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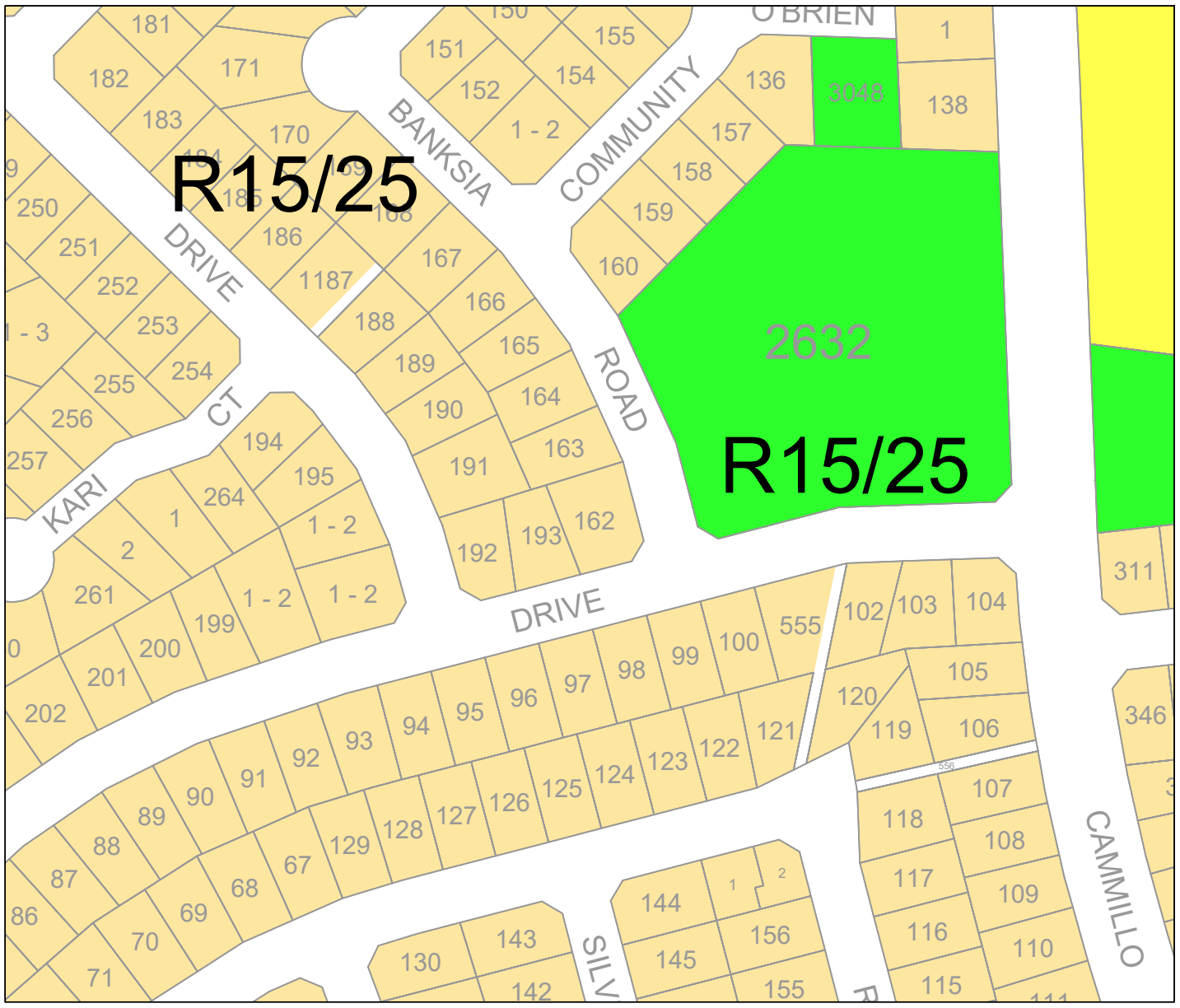
CITY OF Armadale

EXISTING ZONING



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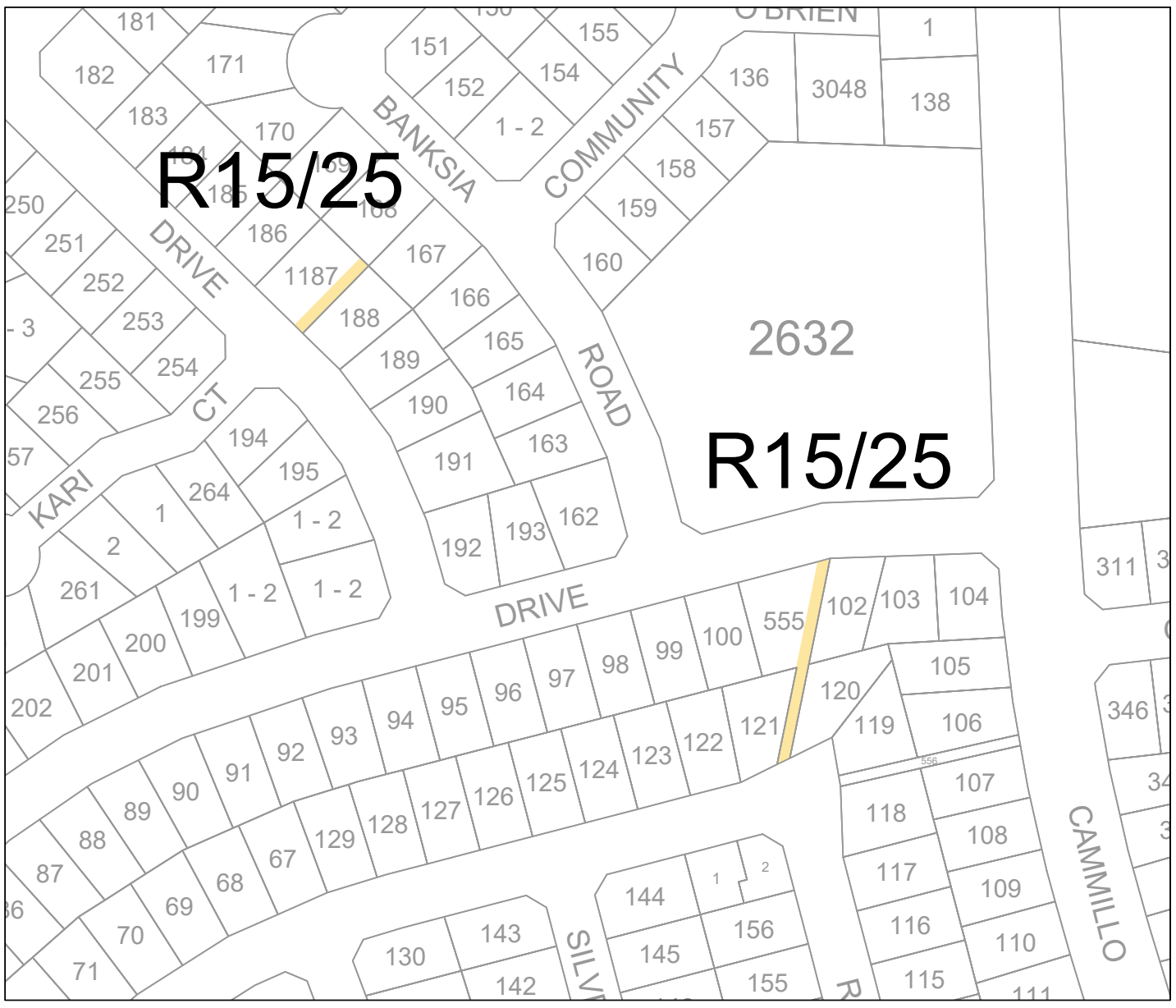

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AMENDMENT No. 130 - Proposal 1 - Map 5
City of Armadale Town Planning Scheme No. 4

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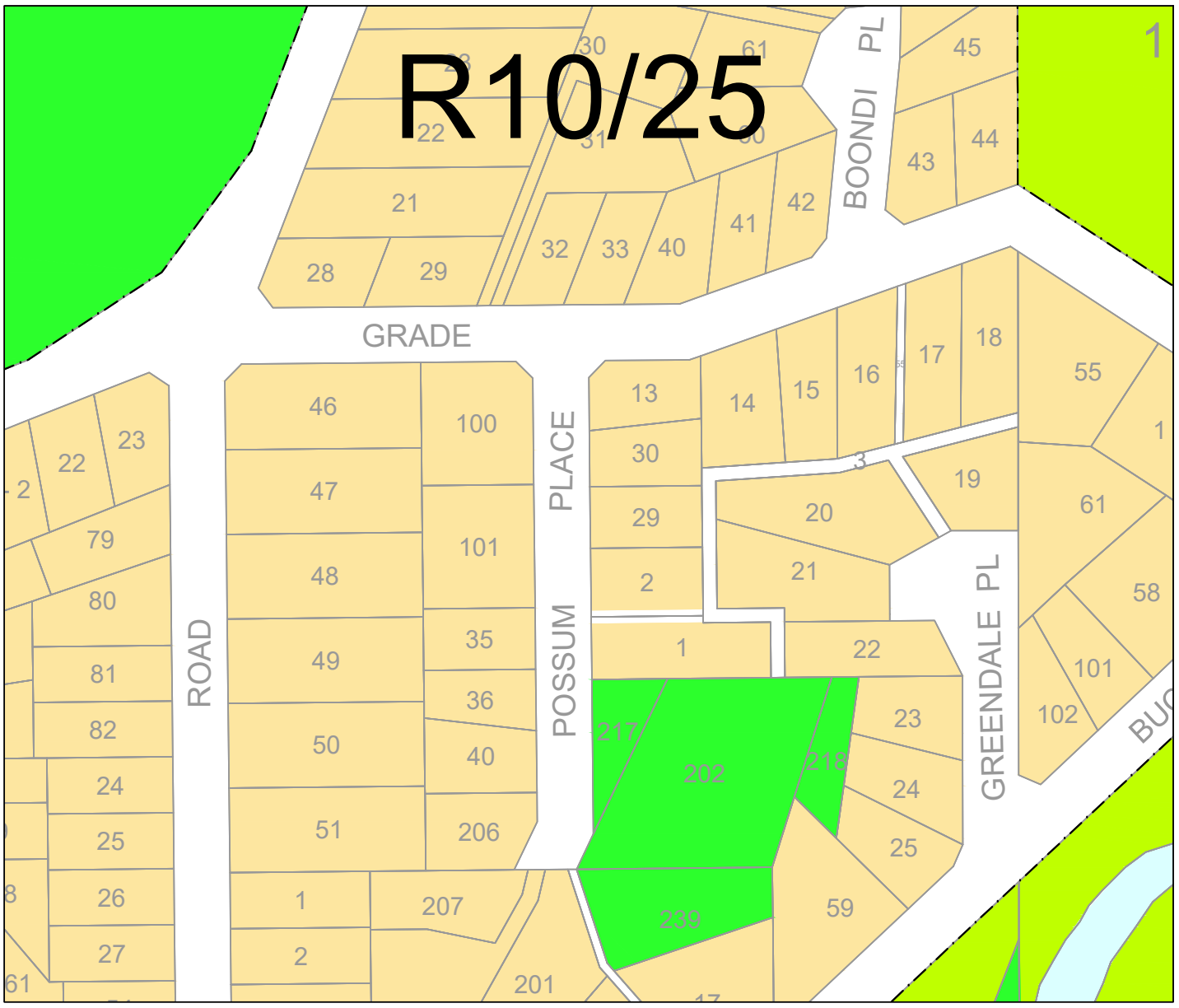
CITY OF Armadale

EXISTING ZONING



ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE
- No.1 ADDITIONAL USE
- No.7 RESTRICTED USE
- RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

PROPOSED ZONING

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
TS	Technical School
HS	High School
PS	Primary School
H	Hospital
WSD	Water Authority of WA
SU	Special Use
SEC	State Energy Commission
T	Telstra

NOTE: The reservations are shown diagrammatically and do not purport to represent the road reservations shown in the Metropolitan Region Scheme and information in respect to road widening requirements for these roads should be obtained from the Department of Planning

AMENDMENT No. 130 - Proposal 1 - Map 6

City of Armadale Town Planning Scheme No. 4

20 0 20 40m

SCALE 1 : 2000

DATE 13 January 2026 - REVISION 2601

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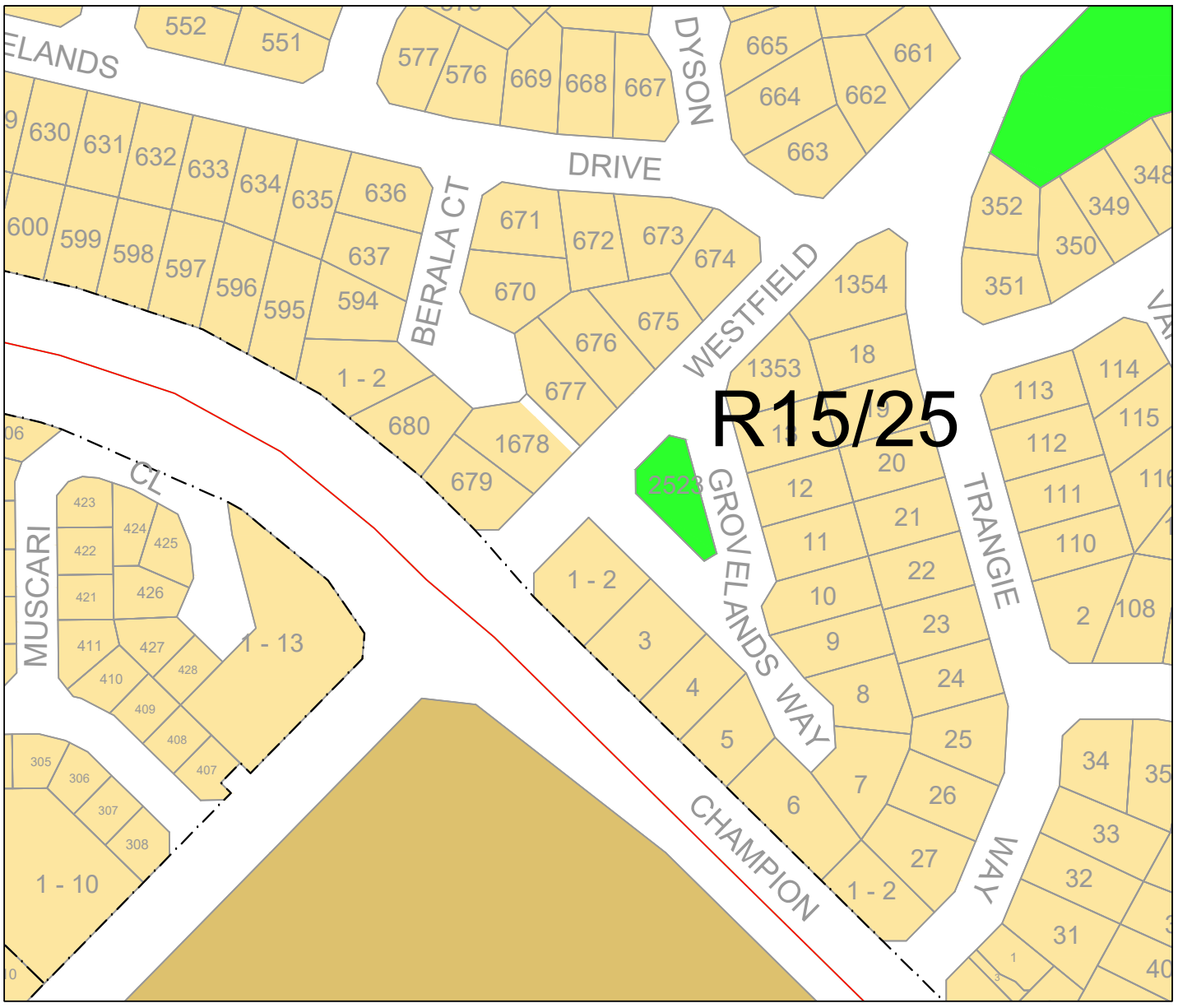
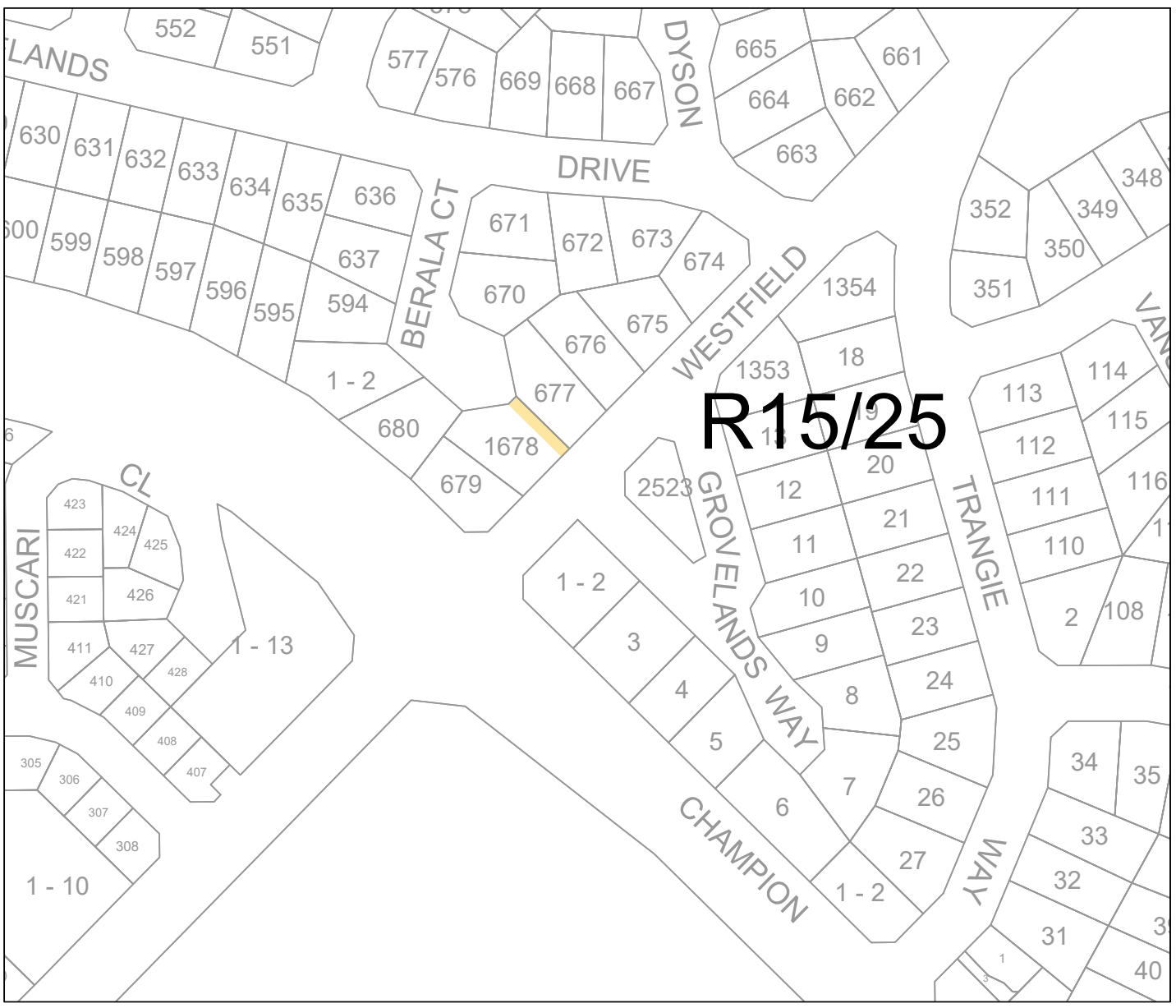
CITY OF Armadale

EXISTING ZONING



PROPOSED ZONING



ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE No.1
- ADDITIONAL USE No.7
- RESTRICTED USE RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
TS	Technical School
HS	High School
PS	Primary School
H	Hospital
WSD	Water Authority of WA
SU	Special Use
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T	Telstra

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AMENDMENT No. 130 - Proposal 1 - Map 7

City of Armadale Town Planning Scheme No. 4

20 0 20 40m

SCALE 1 : 2000

DATE 13 January 2026 - REVISION 2601

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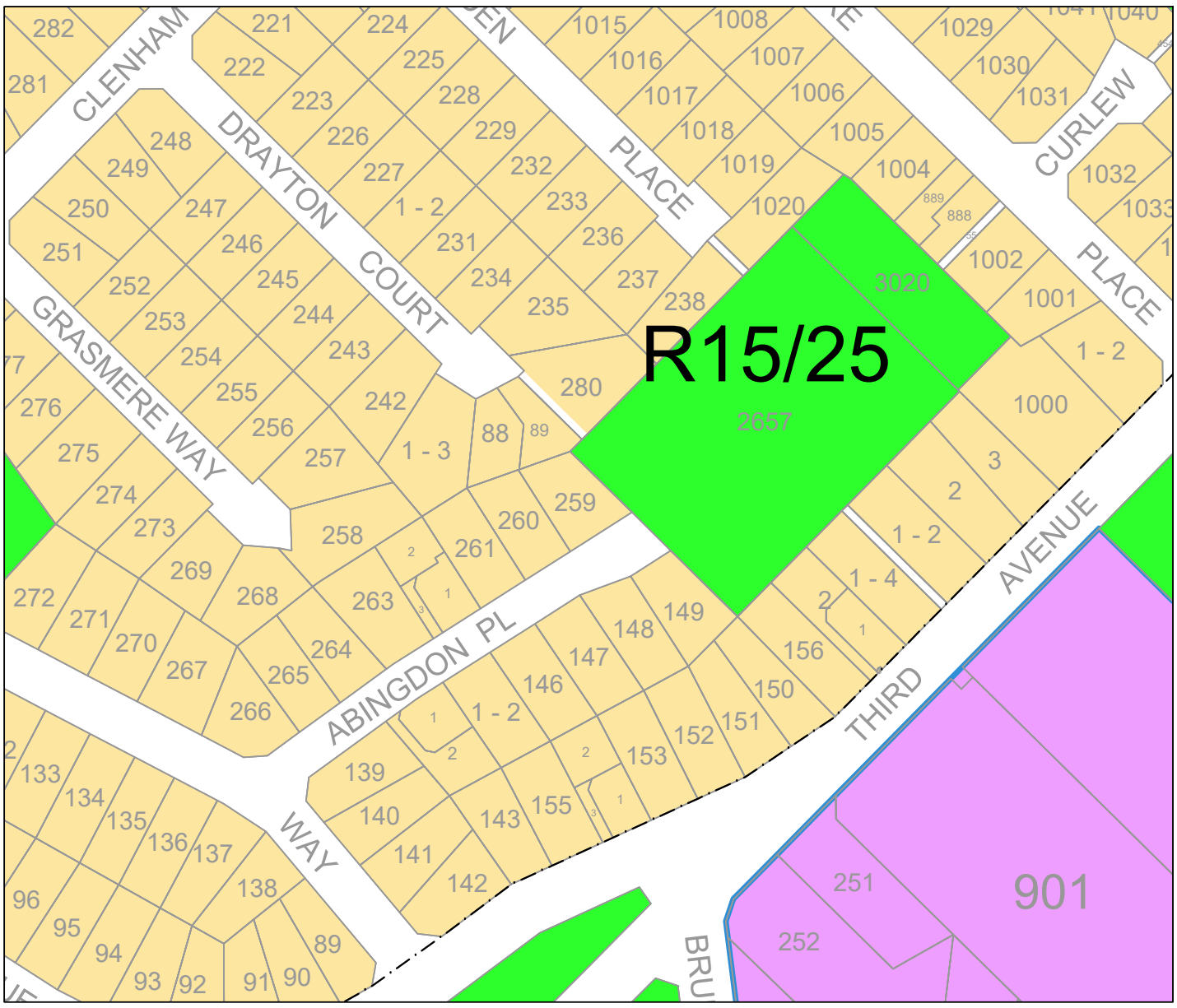
CITY OF Armadale

EXISTING ZONING



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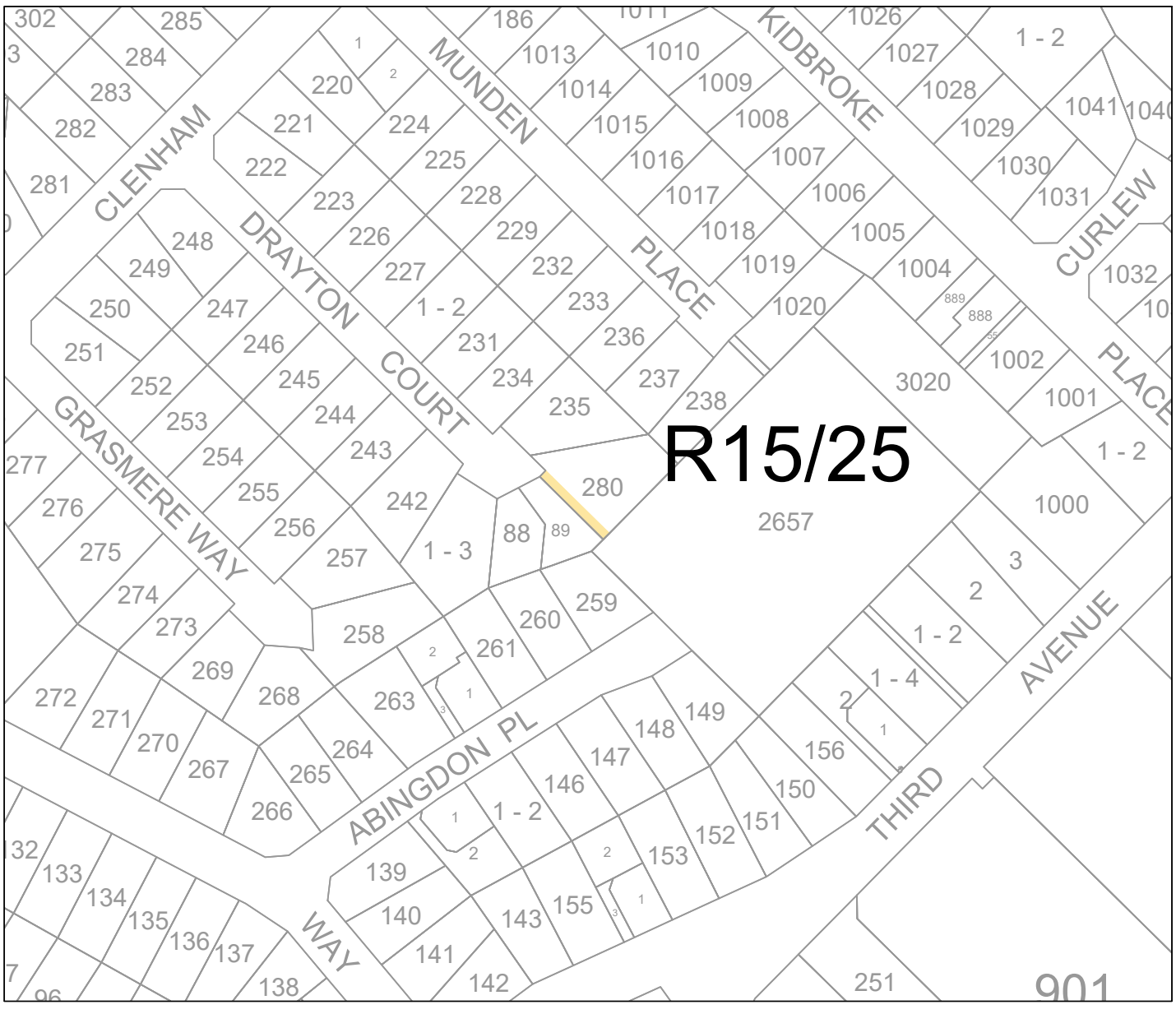

ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE No.1
- ADDITIONAL USE No.7
- RESTRICTED USE RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
TS	Technical School
HS	High School
PS	Primary School
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WSD	Water Authority of WA
SU	Special Use
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T	Telstra

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AMENDMENT No. 130 - Proposal 1 - Map 8

City of Armadale Town Planning Scheme No. 4

20 0 20 40m

SCALE 1 : 2000

DATE 13 January 2026 - REVISION 2601

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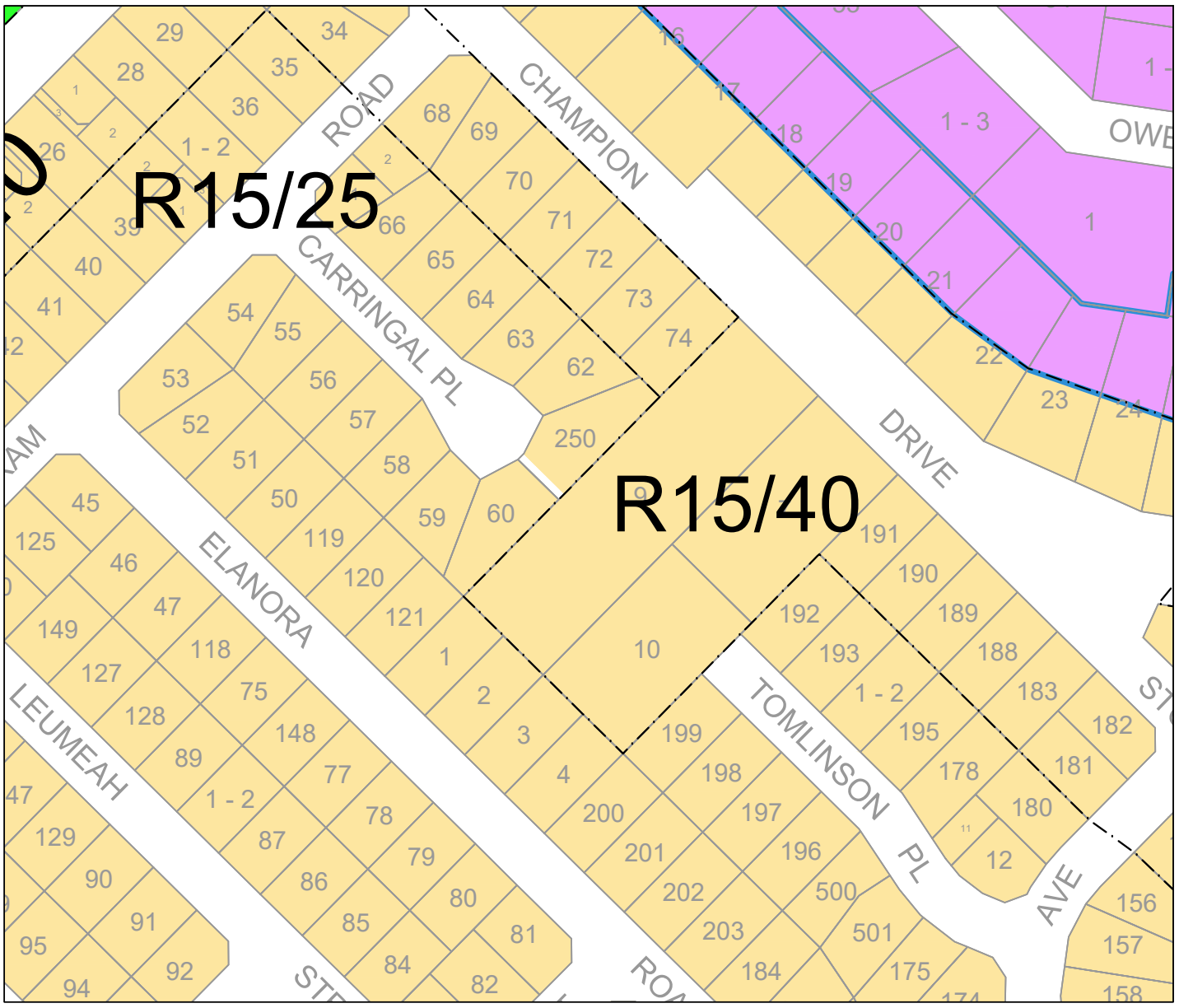
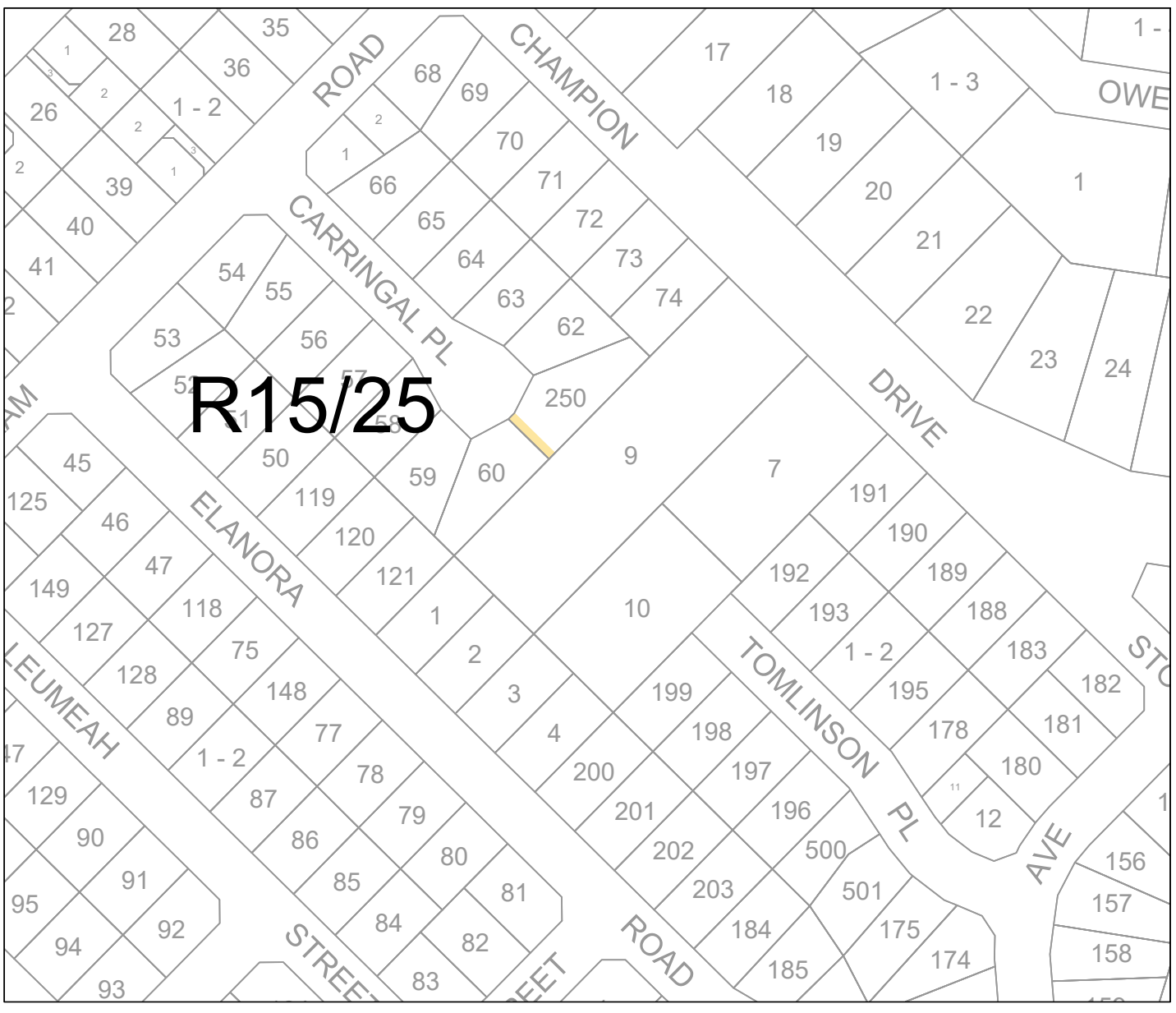
CITY OF Armadale

EXISTING ZONING



PROPOSED ZONING



ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE No.1
- ADDITIONAL USE No.7
- RESTRICTED USE RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
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HS	High School
PS	Primary School
H	Hospital
WSD	Water Authority of WA
SU	Special Use
SEC	State Energy Commission
T	Telstra

NOTE: The reservations are shown diagrammatically and do not purport to represent the road reservations shown in the Metropolitan Region Scheme and information in respect to road widening requirements for these roads should be obtained from the Department of Planning

AMENDMENT No. 130 - Proposal 1 - Map 9

City of Armadale Town Planning Scheme No. 4

20 0 20 40m

SCALE 1 : 2000

DATE 13 January 2026 - REVISION 2601

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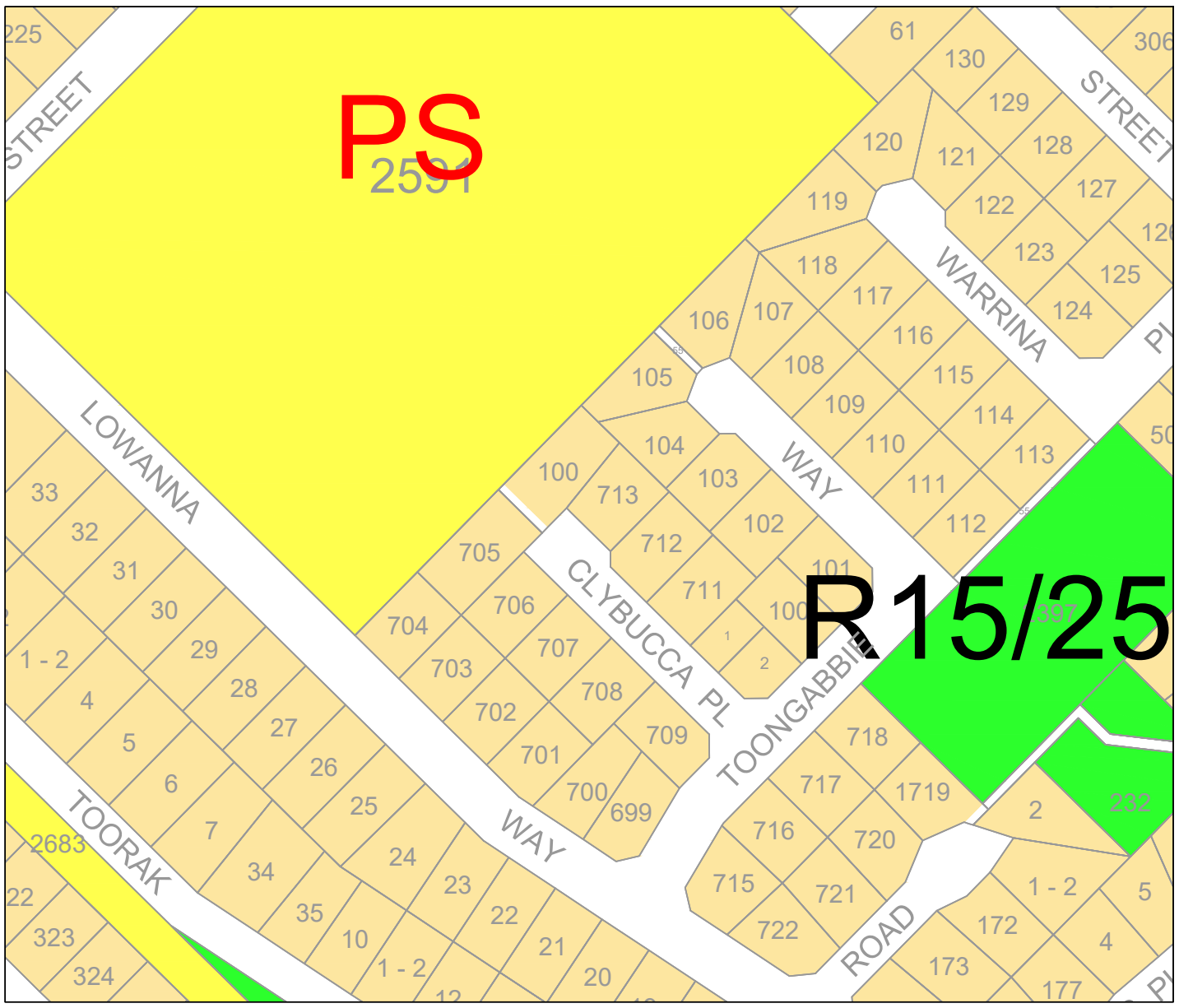
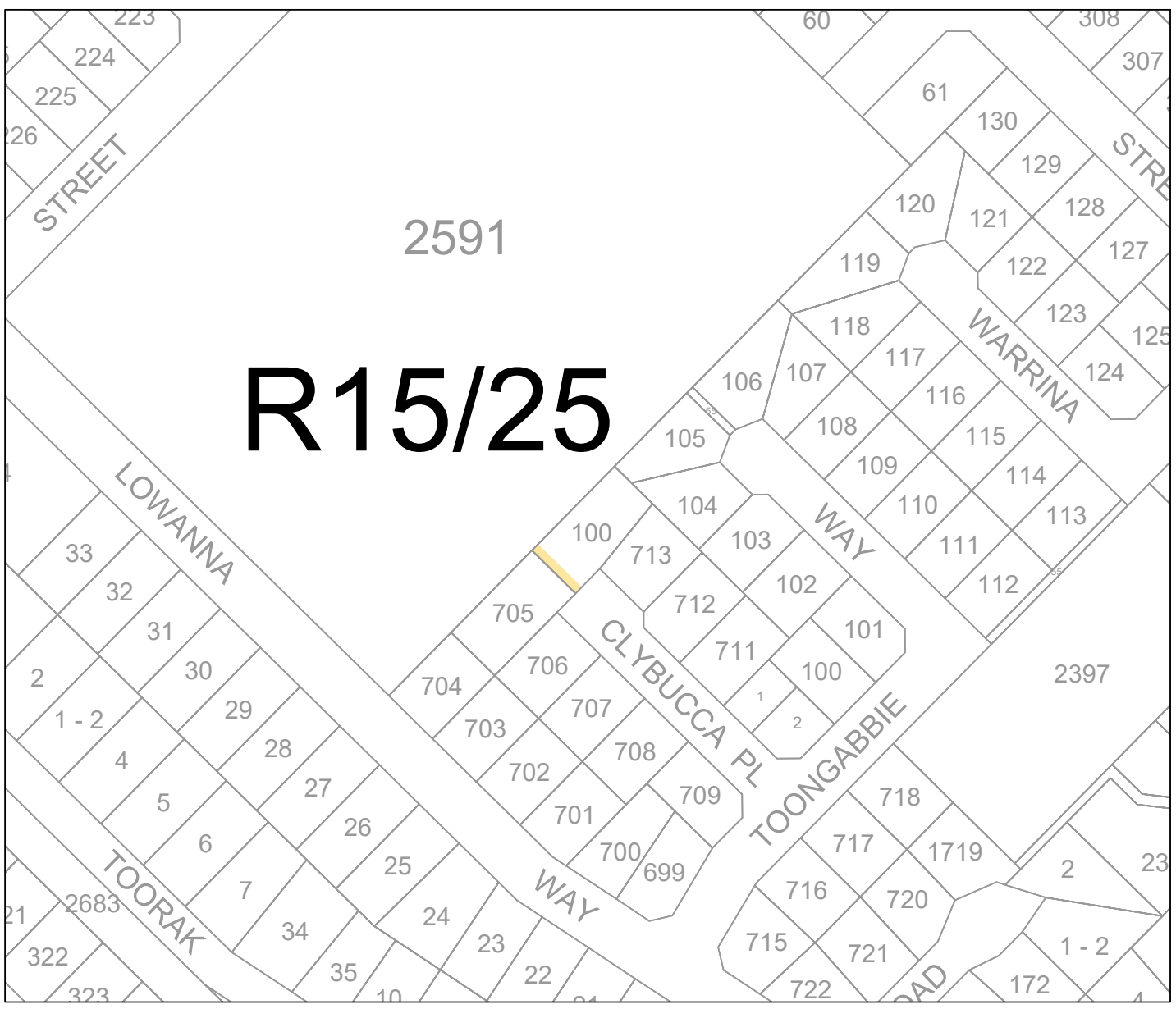
CITY OF Armadale

EXISTING ZONING



PROPOSED ZONING



ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE No.1
- ADDITIONAL USE No.7
- RESTRICTED USE RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
TS	Technical School
HS	High School
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WSD	Water Authority of WA
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T	Telstra

NOTE: The reservations are shown diagrammatically and do not purport to represent the road reservations shown in the Metropolitan Region Scheme and information in respect to road widening requirements for these roads should be obtained from the Department of Planning

AMENDMENT No. 130 - Proposal 1 - Map 10
City of Armadale Town Planning Scheme No. 4

20 0 20 40m

SCALE 1 : 2000

DATE 13 January 2026 - REVISION 2601
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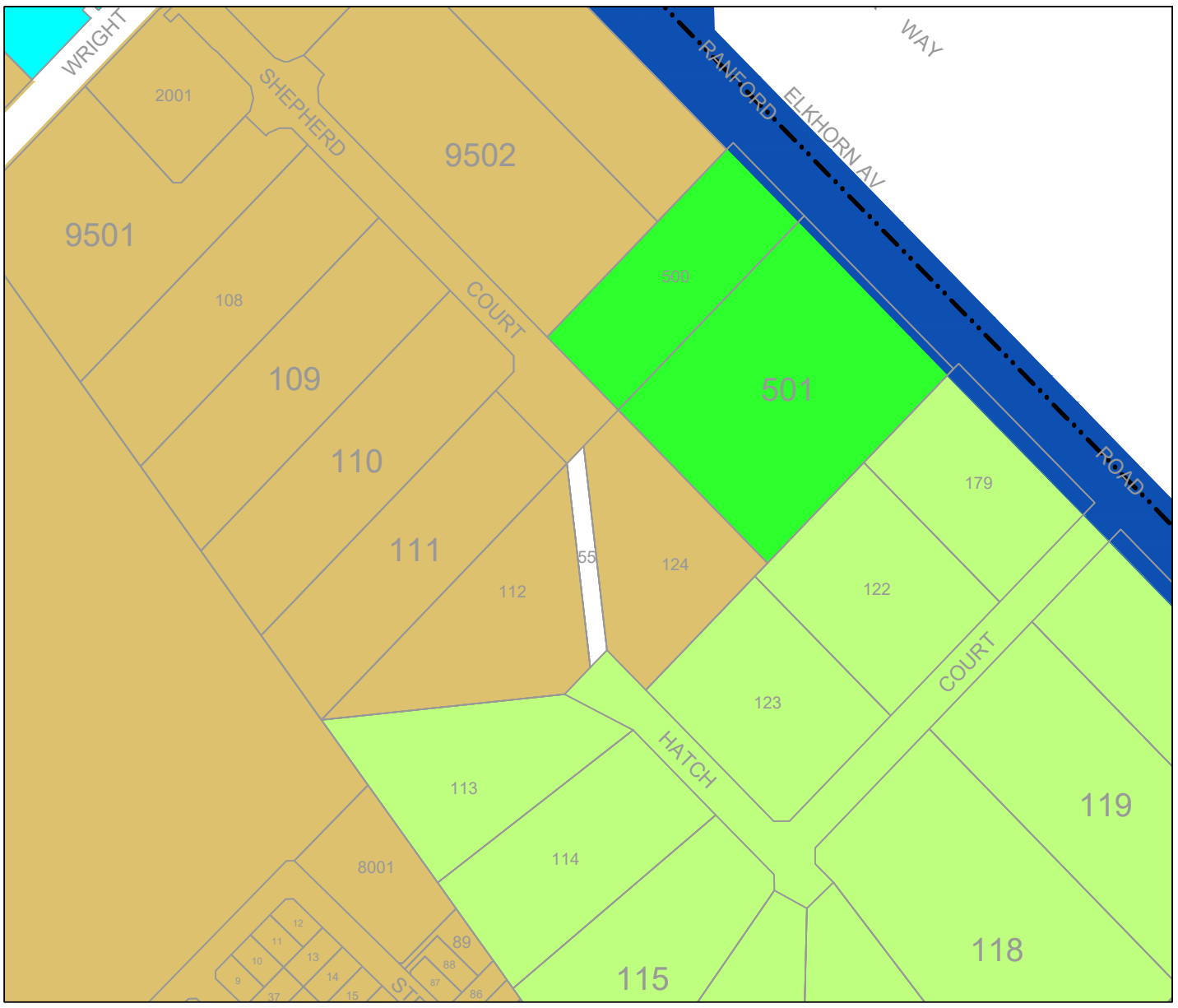
CITY OF Armadale

EXISTING ZONING



PROPOSED ZONING

ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE No.1
- ADDITIONAL USE No.7
- RESTRICTED USE RU No.4
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

CG	Commonwealth Government
TS	Technical School
HS	High School
PS	Primary School
H	Hospital
WSD	Water Authority of WA
SU	Special Use
SEC	State Energy Commission
T	Telstra

NOTE: The reservations are shown diagrammatically and do not purport to represent the road reservations shown in the Metropolitan Region Scheme and information in respect to road widening requirements for these roads should be obtained from the Department of Planning

AMENDMENT No. 130 - Proposal 1 - Map 11

City of Armadale Town Planning Scheme No. 4

30 0 30 60m

SCALE 1 : 3000

DATE 13 January 2026 - REVISION 2601

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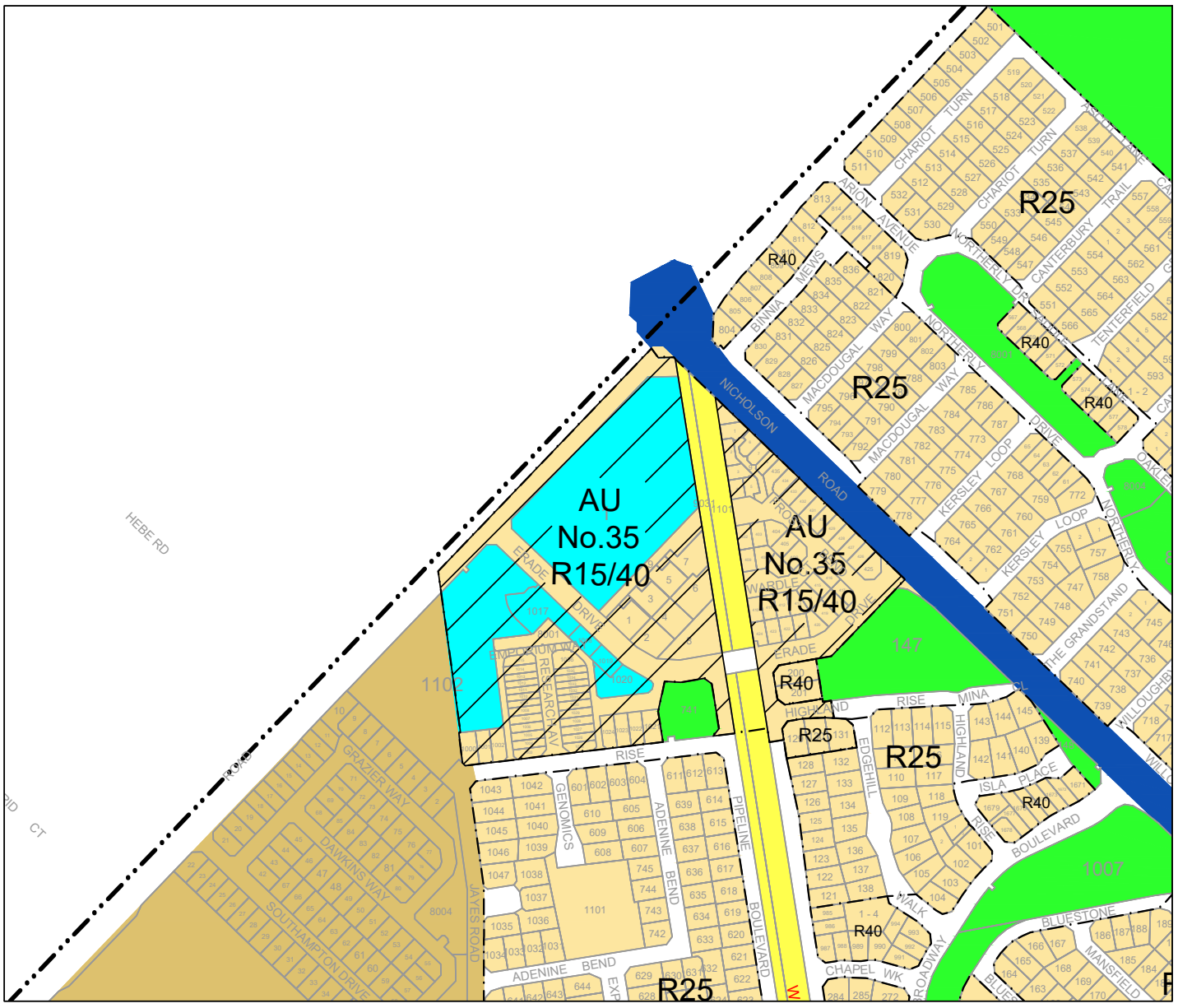
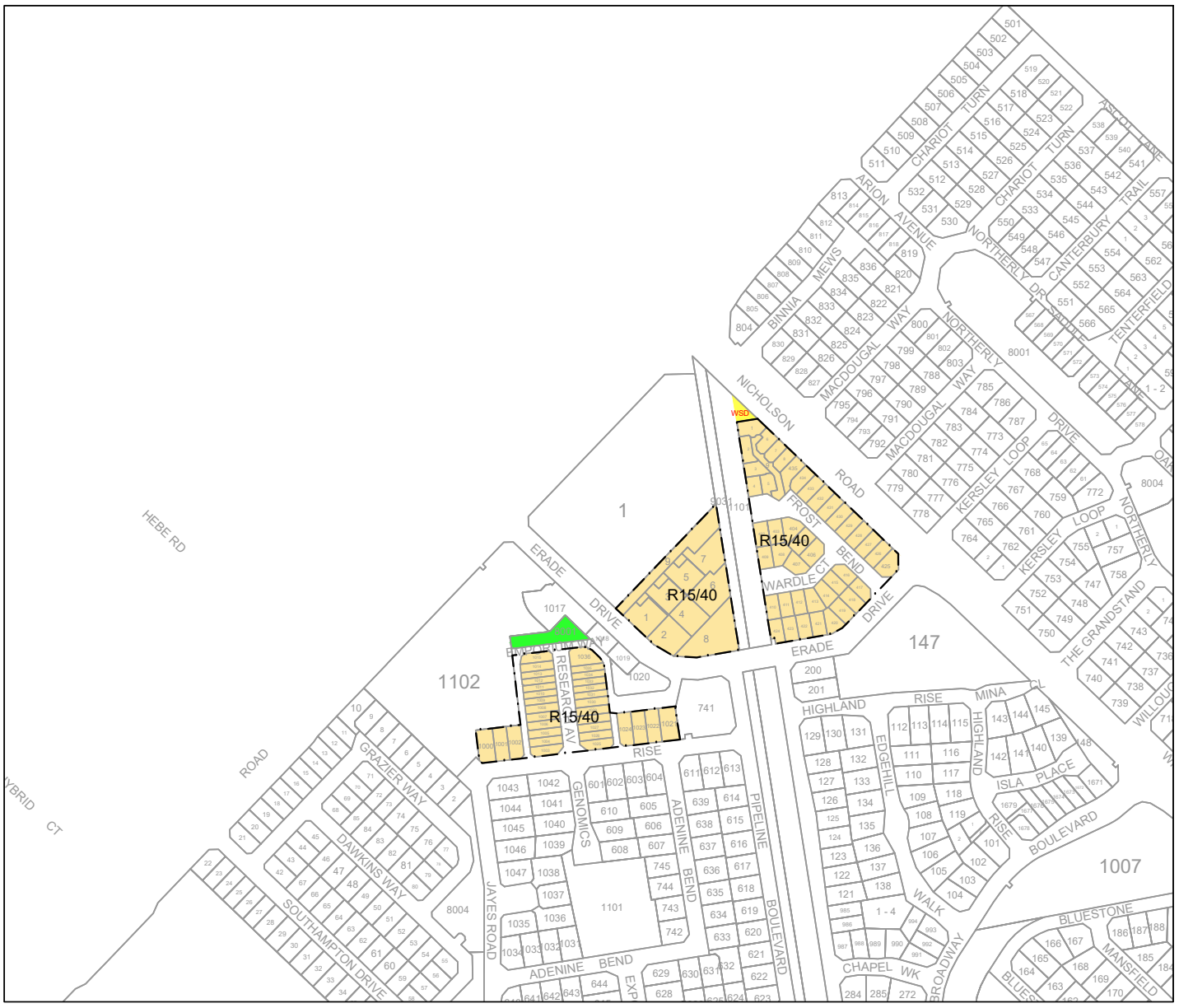
CITY OF Armadale

EXISTING ZONING



PROPOSED ZONING



ZONES

- RESIDENTIAL Including Residential Planning Density Codes
- URBAN DEVELOPMENT ZONE
- RURAL LIVING - 1,2,4,10,20,X
- GENERAL RURAL
- SPECIAL RURAL
- SPECIAL RESIDENTIAL
- MIXED BUSINESS / RESIDENTIAL
- LOCAL CENTRE
- DISTRICT CENTRE
- STRATEGIC REGIONAL CENTRE
- GENERAL INDUSTRY
- INDUSTRIAL BUSINESS
- INDUSTRIAL DEVELOPMENT
- SPECIAL USE
- No.1 ADDITIONAL USE
- No.7 RU No.4 RESTRICTED USE
- DENSITY CODE BOUNDARY
- SCHEME BOUNDARY

RESERVATIONS

- MRS PARKS & RECREATION (Region)
- PARKS & RECREATION (Local)
- RAILWAYS
- STATE FOREST
- WATERWAYS
- WATER CATCHMENTS
- PRIMARY REGIONAL ROADS
- OTHER REGIONAL ROADS
- PUBLIC PURPOSE (Local)
- (MRS) PUBLIC PURPOSE (Region)

PUBLIC PURPOSE
Miscellaneous Sub Categories

- CG Commonwealth Government
- TS Technical School
- HS High School
- PS Primary School
- H Hospital
- WSD Water Authority of WA
- SU Special Use
- SEC State Energy Commission
- T Telstra

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AMENDMENT No. 130 - Proposal 2

City of Armadale Town Planning Scheme No. 4

50 0 50 100m

SCALE 1 : 5000

DATE 13 January 2026 - REVISION 2601

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CITY OF Armadale

Planning and Development Act 2005

CITY OF ARMADALE *TOWN PLANNING SCHEME NO. 4*

AMENDMENT NO. 128

The Armadale City Council under and by virtue of the powers conferred upon it in that behalf by the *Planning and Development Act 2005*, hereby amends the above Local Planning Scheme by:

That Council:

1. **Pursuant to Part 5 of the *Planning and Development Act 2005* to adopt, without modification, Amendment No.128 to Town Planning Scheme No.4 to:**

   a. **Insert the land uses 'hosted short-term rental accommodation' and 'unhosted short-term rental accommodation' into the Zoning Table of Part 3 Zones and the Use of Land with the following levels of permissibility:**

USE CLASSES	**Residential**	**Special Residential**	**Rural Living**	**Special Rural**	**General Rural**	**Local Centre**	**District Centre**	**General Industry**	**Industrial Business**	**Mixed Business/Residential**	**Strategic Regional Centre**
Hosted Short-Term Rental Accommodation	P	P	P	P	P	P	P	X	X	P	P
Unhosted Short-Term Rental Accommodation	A	D	D	D	D	D	D	X	X	D	D

   b. **Delete the land use definition for Bed and Breakfast from Schedule 1 (2) Land Use Definitions and the Zoning Table.**