

CITY OF ARMADALE

MINUTES

**OF DEVELOPMENT SERVICES COMMITTEE HELD IN THE FUNCTION ROOM,
ADMINISTRATION CENTRE, 7 ORCHARD AVENUE, ARMADALE ON MONDAY, 17
NOVEMBER 2025 AT 7:00PM.**

Official Opening and Acknowledgement Of Country read by Dr C Wielinga

The City of Armadale acknowledge the Traditional Owners and the Custodians of the land upon which we stand, work and play. We acknowledge Aboriginal people as the First Peoples of this land and their connection to the lands and waters, as they are part of them spiritually and culturally. We acknowledge their ancestors, the Elders past and present, who have led the way for us to follow in their footsteps and the emerging leaders of today and tomorrow.

PRESENT: Dr C M Wielinga(Chair)
Mayor R Butterfield
Cr J Keogh
Cr L Sargeson
Cr G J Smith
Cr T Thomas

APOLOGIES: Cr A Singh (Leave of Absence)
Cr S J Mosey (Deputy Chair)

OBSERVERS: Cr S J Mosey (Deputy Chair)(via Teams)
Cr S Stoneham (via Teams 7.35pm to 7.43pm)

IN ATTENDANCE:

Ms J Abbiss	Chief Executive Officer
Mr P Sanders	Executive Director Development Services
Mr J Lyon	Executive Director Corporate Services (via Teams)
Mr M Southern	Executive Director Technical Services
Mr P Rosser	Head of Strategic Planning, Place & Development
Mr G Windass	Manager Statutory Planning
Mr P Hoole	Head of Community Infrastructure Planning
Mr K Papalia	Manager City Governance
Mrs N Mathieson	Executive Assistant Development Services

PUBLIC: 13

DISCLAIMER

The Disclaimer for protecting Councillors and staff from liability of information and advice given at Committee meetings was read out as members of the public present.

DECLARATION OF MEMBERS' INTERESTS

Nil

QUESTION TIME

Nil

DEPUTATION

1.2 – Development Application – Place of Worship – 8 Wygonda Road, Roleystone

Deputation commenced at 7.10pm with Clayton Plug from Harley Dykstra and Johnny Dimov as a representative from the Spoken Word Fellowship presenting a Deputation to the Committee regarding the Development Application – Place of Worship – 8 Wygonda Road, Roleystone.

The following comments were provided:

Mr J Dimov addressed the Committee at 7.10pm

- The Church has every intention to be respectful, courteous and considerate to the local residents of Roleystone, including the Country Club. We do not want to disturb the peaceful atmosphere that Roleystone offers and we would like to enjoy this lovely environment just as the locals do. The music played is not loud and intrusive, rather conservative in nature. Members of church will bring income into the local Roleystone community by using cafes and services nearby.*

Mr C Plug addressed the Committee at 7.13pm:

- Proposed Place of Worship to occur in the old squash court building. Since closing several years ago, it has been vacant so this proposal is a good opportunity to provide urban revitalisation. As there are several residential homes near the proposed site, extreme care has been taken to ensure that these residential homes will not be impacted. Acoustic Report assumes adjoining land could return to residential uses, our client is committed to providing the necessary means to reduce any noise (including car noise entering or leaving the site), secondly they are proposing 43 car bays when the Scheme requirement is 35 bays.*

The Chair thanked Mr Dimov and Mr Plug for their comments with the deputation concluding at 7.15pm.

CONFIRMATION OF MINUTES

RECOMMEND

Minutes of the Development Services Committee Meeting held on 6 October 2025 be confirmed.

Moved Cr L Sargeson

MOTION CARRIED

6/0

ITEMS REFERRED FROM INFORMATION BULLETIN - ISSUE 17 - NOVEMBER 2025

No items were raised for further investigation or report.

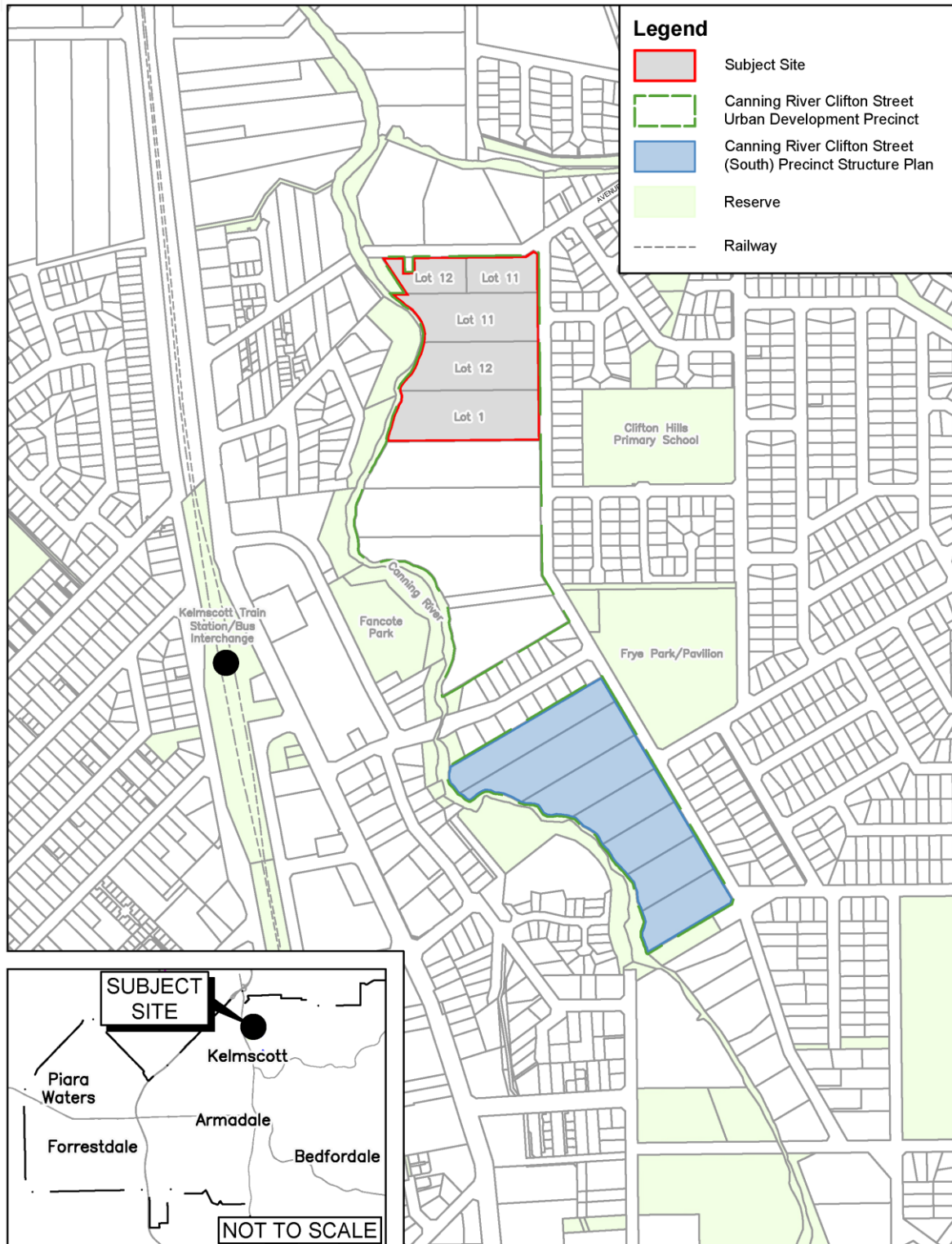
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LOCATION PLAN

Proposed Structure Plan
Canning River & Clifton Street (North) Precinct

DATE 6 March 2025 - REVISION 2501
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SCALE 1 : 10000

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1.1 - STRUCTURE PLAN RECOMMENDATION TO WAPC - CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT

WARD : RIVER

FILE No. : M/339/24

DATE : 11 November 2025

REF : CC/PR

RESPONSIBLE MANAGER : EDDS

APPLICANT : Harley Dykstra on behalf of A Macri

SUBJECT LAND : Lot 12 (No.32)
Brookside Avenue
Lot 11 (No.1), Lot 11 (No.15)
Lot 12 (No.17) and Lot 1 (No.27)
Clifton Street, Kelmscott

ZONING: Urban; Rural

MRS Urban Development;

TPS No.4 Rural Living 2

In Brief:

- A Structure Plan was lodged with the City to guide future development of a portion of Development Area 44 which is also known as Clifton Street North in Kelmscott.
- Recommend that Council resolve to forward the Structure Plan to the Western Australian Planning Commission with a recommendation that the Structure Plan be refused as issues and modifications raised by the City, Mains Roads WA, Department of Fire and Emergency Services, Department of Transport and Department of Biodiversity Conservation and Attraction have not been resolved to the satisfaction of the City and State Government agencies.

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 2026-35

- 2.1.5 Biodiversity is managed to preserve and improve ecosystem health.
- 2.2.1 Focus on achieving high streetscape amenity in new developments.
- 2.2.3 Develop, improve and maintain quality parks, playgrounds and open spaces
- 2.5.1 Align the land use planning framework with the City's strategic objectives and facilitating sustainable design and development
- 2.2.1 Seek tree retention in new developments
- 2.5.2 Actively seek the retention of trees in new subdivisions and developments.

Legal Implications

- *Planning and Development Act 2005*
- *Planning and Development (Local Planning Schemes) Regulations 2015*
- *Environmental Protection Act 1986*
- *Swan and Canning Rivers Management Act 2006*
- *Aboriginal Heritage Act 1972*
- *Heritage Act 2018*
- Metropolitan Region Scheme
- City of Armadale Town Planning Scheme No.4 (TPS 4)

District and Regional Land Use Policy Implications

- WAPC Perth and Peel @ 3.5 million & South Metropolitan and Peel Sub-regional Structure Plan, March 2018.
- WAPC State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region.
- WAPC State Planning Policy 2.10 Swan-Canning River System.
- WAPC State Planning Policy 3.7 – Planning in Bushfire Prone Areas (and Guidelines).
- WAPC Liveable Neighbourhoods Policy.
- WAPC Transport Impact Assessment Guidelines.
- Development Control Policy 2.3 Public Open Space in Residential Areas.
- Development Control Policy 1.6 – Planning to Support Transit Use and Transit Oriented Development.
- City of Armadale Town Planning Scheme No.4.
- Local Planning Strategy 2016.

Council Policy/Local Law Implications

- PLN 2.4 Landscape Feature and Tree Preservation
- PLN 2.5 Erosion and Sediment Control
- PLN 2.6 Water Sensitive Design
- PLN 2.9 Landscaping

Budget/Financial Implications

Although there are no direct financial implications, subsequent land development generates an additional rate base, however this is offset by additional service demand, asset management and capital and operational costs for new/upgraded infrastructure/local facilities.

Consultation

1. Development Control Unit and City Directorates
2. State Government agencies and service (utilities) providers
3. Advertising for public comment.

BACKGROUND

The Applicant's Structure Plan area is made up of five lots with a total area of 6.7 hectares that are currently used for rural lifestyle purposes. The lots are developed with Single Houses and other improvements such as sheds, dams and landscaped gardens. The Structure Plan area is relatively flat but slopes down toward the Canning River.

The Applicant's landholding - Lot 11 (No.1) Clifton Street (corner of Brookside Avenue) is 7,291m² and represents 11% of the Structure Plan area. The other three landowners are not directly coordinating (or funding) the preparation of the Structure Plan. Their landholdings combined are 5.99 hectares and represent 89% of the Structure Plan area and include land adjoining the Canning River identified as foreshore reserve and includes areas classified as Conservation Category Wetland (CCW) and/or Bush Forever under State Government policies.

The Structure Plan area is part of a broader area of similar landholdings referred to as the Canning River Clifton Street Urban Development Precinct (the Precinct) comprising 16 lots and located between the Canning River and Clifton Street, up to Brookside Avenue in the north and down to Martin Street in the south. The Precinct excludes smaller housing lots generally fronting Gilwell Avenue which bisects the Precinct into northern and southern sub-precincts.

Since the early 2000s in response to the State Government (Western Australian Planning Commission) decisions, the Precinct was subject to several planning studies and processes carried out by both the City and the State Government to investigate urban development options and to preserve the Canning River environs for foreshore protection and parks. These studies included:

- Kelmscott Enquiry by Design Workshop, 2003; and,
- Canning River Precinct Community Consultation Planning Study, 2005

WAPC's Metropolitan Region Scheme Amendment and Environmental Review

The outcome of these earlier planning studies led to the Precinct being subject to an Environmental Review - *Environmental Review Canning River Precinct, 2009* that satisfied the assessment requirements under the *Environmental Protection Act 1986* and justified most of the Precinct's rezoning from Rural to Urban in the State Government's Metropolitan Region Scheme (MRS).

The Environmental Review of 2009 defined an area for a foreshore reserve as 30 metres from the centre line of the river channel which was retained as Rural zone in the MRS to exclude land from future development and allow for its future ceding as a foreshore reserve in subsequent subdivision processes. The MRS amendment (Ref. MRS 1202/41) was gazetted on 25 May 2012.

Amendment No. 70 to TPS4

The City was required under *Planning and Development (Local Planning Schemes) Regulations 2015* to bring its local planning scheme into alignment with the MRS. The City rezoned the MRS Urban zone portion of the Precinct to Urban Development zone under Amendment No.70 to TPS4 which also introduced structure plan requirements into Schedule 8 - Development (Structure Plan) Areas. The Amendment was granted final approval by the then Minister for Planning and was gazetted on 14 February 2014. The Schedule 8 Structure Plan requirements are discussed in the Analysis section below.

Clifton Street (South) Precinct Structure Plan

A structure plan for the southern portion of the Canning River Clifton Street Precinct was adopted subject to modifications including the requirement to submit revised/additional technical reports by Council at its meeting 16 December 2016 and approved by WAPC on 19 June 2017.

All of the planning studies for the Precinct were subject to public and stakeholder consultation as required under planning legislation.

DETAILS OF PROPOSAL

The applicant's Structure Plan proposes:

- 395 dwellings at housing density codes of R40, R60 and R80 serviced by local roads;
- A foreshore reserve of 9,931m² along the Canning River; and,
- Public open space of 6,799m² adjacent to the foreshore reserve which includes land identified as CCW and Bush Forever by the State Government.

Refer to Attachments for Proposed Local Structure Plan – Clifton Street North Precinct, Kelmscott.

The Applicant has estimated the proposed dwelling yield within the Structure Plan area as 395 dwellings, with a population estimate of 987 persons (based on 2.5 persons per dwelling).

The Structure Plan (as advertised) includes the following documents:

- Structure Plan Map
- Structure Plan Report - Part 1 Implementation Section and Part 2 Explanatory Report
- Bushfire Management Plan
- Local Water Management Strategy
- Transport Impact Assessment
- Engineering Servicing Report
- Mosquito Management Plan
- Environmental Report – Flora Vegetation and Black Cockatoo Assessment
- Landscaping Plan; and
- Erosion and Sediment Worksheet.

COMMENT

The Structure Plan was advertised for 43 days from 27 July 2023 to 8 September 2023 in accordance with the provisions of *Planning and Development (Local Planning Schemes) Regulations 2015*. Advertising included:

- a notification sign on site;
- notification letters to government agencies and service (utility) providers;
- advertisements (public notices) in The Examiner and West Australian Newspapers; information on the City's website; and,
- notification letters to neighbouring landowners that may potentially be affected by the proposal.

A total of 285 submissions were received as follows:

Summary of Submissions	No.
Total No. of submissions received	285
No. of public submissions of support	12
No. of public submissions of objection	243
No. of public submissions of comments/concerns	19
No. of agency submissions of no objection/comments only	7
No. of agency submissions of recommended modifications	3
No. of agency submissions of objection	1

The issues raised by the submitters have been summarised and comments and recommendations made. Refer to attachments for Schedule of Submissions, Confidential Submitter Plan and Confidential Schedule of Submitters' Names and Addresses List.

Planning Legislation

The *Planning and Development (Local Planning Schemes) Regulations 2015* sets out the process requirements for Structure Plans. Schedule 2, Part 4, Clause 20 stipulates that:

- (1) *The local government must prepare a report on the proposed structure plan and provide it to the Commission no later than 60 days after the day that is the latest of —*
- (a) *the last day of the period for making submissions on the proposed structure plan that applies under clause 18(3A); or*
 - (b) *the last day for making submissions after a proposed modification of the structure plan is advertised under clause 19(2); or*
 - (c) *a day agreed by the Commission.*

The City and the applicant agreed to several extensions to the statutory 60-day structure plan processing timeframe as indicated under Clause 20(1)(a) above, for the applicant to resolve City and State Government agency issues and modifications in revised Structure Plan documents or written responses. The last agreed final extension was until the end of February 2025, however the applicant did not resolve the issues and modifications by the agreed final extension date and the City's recommendation to the WAPC is now overdue. Revised Structure Plan documents were however received from the applicant on 8 August 2025 and are discussed below in the Section - Revised Structure Plan Submission.

Submissions of Support

Twelve (12) public submissions of support were received and of these submissions six were from different individuals from the same property. The matters raised in support of the Structure Plan include:

1. housing benefits including affordable and diverse housing and local downsizing opportunities;
2. social/community benefits including more younger families, couples and singles in the area;
3. amenity benefits including new residents close to parks, public transport, schools and other public and commercial services and provision of new public open space; and,
4. environmental benefits including better management of the Canning River, retention of trees and rehabilitation.

Submissions of Comment Only

Nineteen (19) submitters indicated that their submission was ‘Comment Only’ but their comments are generally consistent with the concerns and issues in submissions of objection discussed below.

Submissions of Objection

243 submissions of objection were received which raised a wide range of concerns and issues. The main issues are discussed below.

Issue 1 - Environment Impact Concerns

Issue 1a

The submitters advise of concerns regarding loss of flora, fauna (including habitat e.g., Black Cockatoo), trees and/or biodiversity.

Comment

The Applicant’s *Flora, Vegetation and Black Cockatoo Assessment Report, May 2023* (Environmental Assessment Report) submitted in support of the Structure Plan concluded the following:

- Environmental values of the vegetation in the Structure Plan area surveyed were limited and/or degraded;
- Biodiversity was determined to be low due to historic clearing;
- No State or Commonwealth listed Threatened or Priority Flora were identified during the survey or assessed as having a high to medium likelihood of occurring in the Structure Plan area;
- One hundred and thirty-nine Black Cockatoo habitat trees were identified, however only two had appropriately sized nesting hollows. Both these trees are located in the Structure Plan’s proposed POS; and,
- Vegetation across the Structure Plan area was not intact and therefore not considered to be a suitable habitat for ground dwelling fauna.

The City is of the view that there is potential for ground dwelling native fauna to be present in the Structure Plan area and that this matter is capable of being resolved through the subdivision process via a fauna relocation plan condition.

Recommendation 1a

Supported in part. Most of the concerns are addressed in the Environmental Assessment Report and relocation of ground dwelling native fauna is capable of being resolved through the subdivision process.

Issue 1b

The submitters advise of concerns regarding the adequacy of the Environmental Assessment Report including:

- *The proposal should be subject to a public environmental review;*
- *Little attention was given to other avian, terrestrial and aquatic species (besides Black Cockatoo); and,*
- *Field survey in the environmental assessment report was undertaken in February not in spring (September to November) the recommended primary survey period as per Environmental Protection Authority (EPA) Technical Guidance for Flora and Vegetation Surveys (2016).*

Comment

The Department of Water and Environmental Regulation (DWER) in its Structure Plan submission did not identify the need for a further public environmental review.

Aquatic species could be protected by the future ceding of the proposed foreshore reserve and POS and through the preparation and implementation of a foreshore management plan and POS landscape plan at subdivision stage. Terrestrial species could be relocated as a condition of subdivision. Whilst attempts are always made to maintain existing trees through later subdivision and development processes, the loss of some habitat trees for avian species may occur due to development.

The applicant's Environmental Assessment Report stated that the timing of the field survey was considered appropriate given the objectives of the survey, and that no annual or timing dependent Threatened or Priority Flora were expected to occur within the Survey Area. The results of the survey are consistent with those of the field survey undertaken for the Environmental Review of 2009. The DWER and Department of Biodiversity Conservation and Attractions (DBCA) in their submissions (detailed below) on the Structure Plan and Environmental Assessment Report did not raise specific concern regarding the timing of the field survey although the DBCA raised a general concern regarding protection of vegetation and other concerns regarding the other Structure Plan technical reports.

Recommendation on 1b

Supported in part. The concerns are dealt with in the Environmental Assessment Report and/or are capable of being managed through the subdivision process.

Issue 1c

The submitters advise of concern regarding urban stormwater pollutants impacting the Canning River ecosystem including erosion and excessive run-off entering the river as uncontrolled flows.

Comment

The City requires urban stormwater to be managed in accordance with best practice through the preparation of a local water management strategy (LWMS) in accordance with State policy and acceptable to the City and the DBCA. The City would require the LWMS to include vegetated drainage basins to remove pollutants and nutrients from stormwater and to

prevent erosion. The amount and quality of stormwater entering the river would be maintained to pre-development levels however, during very intense rainfall events, stormwater may flow directly into the river. The submitted LWMS has several issues and modifications that need to be addressed by the applicant, so it is not acceptable and requires modification.

Recommendation 1c

Supported. The concerns should be resolved in a revised LWMS and through the subdivision process.

Issue 1d

The submitters advise that more mature trees including lines of gum trees along lot boundaries outside of the Structure Plan's proposed foreshore reserve and POS should be retained for aesthetic and environmental purposes and to retain canopy cover and reduce urban heat island impacts.

Comment

The Structure Plan and the applicant's Landscaping Plan (Harley Dykstra, May 2023) have identified trees within the POS and foreshore reserve for retention. The Landscaping Plan proposes planting of small-scale trees in proposed local road reserves due to their verge widths and planting of small and large trees within the proposed POS. The species lists for verge and public open space trees in the Landscaping Plan could be refined at the subdivision stage to meet City requirements.

Further, at the subdivision stage the City can recommend the WAPC impose a condition of approval for the identification of trees on site worthy of retention which would include trees outside of the proposed POS and foreshore reserve. It is noted however that tree retention would potentially be impacted by subdivision design requirement e.g. earthworks, fill, road layout and servicing which would require careful consideration as part of the subdivision design process.

The planting of trees on the verge and in the POS can partly assist with reducing the urban heat island effect and increasing canopy cover post subdivision development works when the trees grow.

Recommendation on Issue 1d

Supported in part. Careful consideration and liaison between the applicant, the City and the State Government is recommended to maximise the protection of existing trees (including trees outside the proposed POS and foreshore area) and the planting of new trees at subdivision stage.

Issue 1e

The submitters advise of concerns that future development is too close to the riverbank including flooding potential and lack of a 50m setback/buffer to Canning River (waterway) as required under State Planning Policy 2.9 Water Resources (SPP2.9)

Comment

The proposed residential areas in the Structure Plan would not be subject to flooding events of the Canning River as these events are contained within the proposed POS and foreshore area. The applicant's LWMS proposes disposal of stormwater from proposed urban

development areas into drainage/detention basins in the POS with overflow into the Canning River where appropriate, to ensure that residential areas would not be impacted by flooding.

SPP 2.9 requires estuaries to have a development setback of 50 metres and waterways to have a foreshore reserve or buffer width of 30 metres either side on the waterway. As the Canning River is a waterway, the 30 metres reserve or buffer is applicable. The foreshore reserve identified in the Structure Plan is 30 metres wide and was determined by the State Government in the Environmental Review of 2009 for MRS Amendment 1202/41 that rezoned the land to Urban and retained the identified 30 metre wide foreshore reserve in the Rural zone. The Environmental Review of 2009 stated that the 30 metre wide foreshore reserve was considered an equitable solution on the following grounds:

- *“Most landowners would generally be required to cede a common 30m of foreshore on subdivision per WAPC DC Policy 2.3;*
- *A 30m reservation encompasses the majority of the high value biophysical attributes of vegetation, floodway and Bush Forever; and*
- *A 30m reservation is considered appropriate width for both maintenance and protection of the waterway in an existing urban area.”*

Recommendation on Issue 1e

Not supported. The flooding could be managed by the finalisation of a satisfactory LWMS and the matter of the 30m wide buffer is the foreshore reserve as determined in the Environmental Review of 2009 for MRS Amendment 1202/41.

Issue 1f

The submitters advise of concern regarding lowering or rising of the water table due to urban development.

Comment

The submitted LWMS identified that groundwater across the site ranges from 3.48 metres to 7.41 metres below ground level. Water tables sometimes rise after urban development however rises are generally less than one metre with a negligible impact on development. It is noted that the LWMS recommends monitoring groundwater levels for 2 years post-subdivisional development by the developer.

Recommendation on 1f

Not supported.

Issue 1g

The submitters advise of concern regarding construction impacts including fill sand and other debris entering the river, vehicle traffic, and air/dust and noise pollution caused by subdivision works.

Comment

As part of the subdivision process, the City can recommend to the WAPC a condition for preparation of a Construction Management Plan (CMP) to protect the river and manage air-born dust, erosion and sedimentation, noise, and other impacts caused by construction activity. The CMP would also deal with operating times, truck routes and parking for site workers. Subdivision works will also need to comply with the *Environmental Protection (Noise) Regulations 1997*.

Recommendation on 1g

Supported. The concerns are capable of being resolved through the subdivision process by a CMP condition.

Issue 2 - Housing Density and Built Form Concerns

Issue 2a

The submitters advise the Structure Plan area is too far from Kelmscott Train Station for Transit Orientated Development (TOD) at higher densities.

Comment

The Structure Plan report has partly justified the proposed densities on the grounds that the Structure Plan area is within the 800m radius walkable catchment of the Kelmscott Train Station. The WAPC's "Development Control Policy 1.6 – Planning to Support Transit Use and Transit Oriented" (DCP 1.6) indicates that densities of R25 and above are expected to be applied in areas that are close to high frequency public transport.

Many submissions point out that DCP 1.6 requires a more detailed analysis of the walkable catchment that determines the walking distance along the existing and proposed road network. When this analysis is applied and assuming no new pedestrian bridge over the river is built, the Structure Plan area is greater than 800 metres walking distance to the Kelmscott train station which indicates that higher densities may not be justifiable under DCP 1.6. Refer to Attachments for Walkability Plan.

Given the above, the City does not support R60 and R80 which is classified as high density in the Residential Design Codes. The Structure Plan report and map, Transport Impact Assessment and the LWMS should be revised to take into consideration the recommended change to the Structure Plan's housing density.

Recommendation on 2a

Supported in part. The Structure Plan report and map and relevant technical reports should be modified to replace reference and consideration of R60 and R80 density with R40. Refer to Attachments for Issues and Modifications Plan.

Issue 2b

The submitters advise the housing densities are too high in comparison to the adjacent residential area and will result in overcrowding.

Comment

The housing density difference that would occur between the east and west sides of Clifton Street is addressed in the Structure Plan Map which locates the R40 density code (lowest of the three proposed R-Codes) along the west side of Clifton Street. The residential area east of Clifton Street which is coded R15/25 could be redeveloped at the higher R25 density code in the future. A similar R40 density interface was used in the Canning River Clifton Street (South) Structure Plan to the south.

Regarding overcrowding concerns, the projected population in the Structure Plan report of 987 persons is based on 2.5 persons per dwelling and as such is not too dissimilar to the average household size 2.41 persons per dwelling in the Kelmscott East locality as indicated on the City's Community Profile online demographic resource. The removal of the R60 and

R80 coded land on the Structure Plan Map, as recommended under Issue 2a above, would reduce the dwelling yield and resultant population in the Structure Plan area.

Recommendation on 2b

Supported in part. Densities are recommended for modification

Issue 2c

The submitters advise of concerns regarding building height (including overlooking), bulk, scale and/or appearance in comparison to adjoining residential areas including impact to existing views.

Comment

Other built form concerns of submitters can be addressed in the development application/approval processes. Where proposals are not for single houses, development approval conditions for varied colours and materials, inclusion of architectural details and the breaking up of expansive building elements are capable of addressing the other built form concerns. Regarding privacy and overlooking concerns, all new buildings would be required to comply with R-Codes privacy requirements to resolve these concerns.

Recommendation on Issue 2c

Supported in part. Local Development Plans can be recommended by the City as a subdivision condition with building height restrictions.

Issue 2d

The submitters advise the densities proposed exceed the minimum average residential density target of 15 dwellings per gross urban; zoned hectare as indicated in the State Planning frameworks for the locality - Perth and Peel at 3.5 million and South Metropolitan and Peel Sub-regional Structure Plan.

Comment

15 dwellings per gross urban zoned hectare (R15) is a minimum requirement under the abovementioned State Government planning frameworks. Typically, outer and inner metropolitan urban estates are developed at densities higher than R15 due to the need to better use available land particularly in the context of state-wide housing shortfalls. It is expected that densities higher than R15 would be applied in areas in close proximity to existing amenities i.e. public transport and Kelmscott city centre.

Recommendation on Issue 2d

Not supported.

Issue 2e

A submitter in the Structure Plan area advises that proposed street block depth of approximately 40m on the Structure Plan to service R60 and R80 land is insufficient, only allowing for lots with 20m depth whereas 25 to 30 metres depth is the preferred for desired housing.

Comment

The 40m wide street block depth is applied to some of the land coded R60 and R80 in the Structure Plan area. As discussed under issue 2a above, it is recommended that R60 and R80 coded land be replaced. A variation to the street block depth could be considered as a

modification to the Structure Plan or at subdivision stage to accommodate specific building designs that require greater depth.

Recommendation on Issue 2e

Not supported. The issue is capable of being addressed as a Structure Plan amendment or at subdivision stages.

Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

Issue 3a

The submitters advise of concerns regarding the capacity of local schools i.e. Clifton Hills Primary School, Kelmscott Primary School and Kelmscott Senior High Schools to accommodate increase in students and related concerns e.g., education standards, loss of recreation space (to demountable classrooms), traffic and safety issues and lack of parking.

Comment

The Department of Education (DoE) in its Structure Plan submission advised that the Structure Plan area falls within the student enrolment intake areas of Clifton Hills Primary School and Kelmscott Senior High School and that the Structure Plan development yield would not significantly impact on the accommodation capacity of these two schools.

The City considers that any subdivision and development of the area would occur over a number of years so growth in student numbers would occur gradually, allowing the schools time to adjust their services to meet any requirements.

Recommendation on Issue 3a

Not supported. The concerns are addressed in the DoE submission and under Topic 7 - Traffic and Transport Infrastructure Concerns, below.

Issue 3b

The submitters advise of concerns regarding adequacy of hospitals, other medical establishments and decline in standards of health services due to additional residents from the Structure Plan development.

Comment

The provision of public health facilities (hospitals) and associated standards of health care are the responsibility of the State Government's Department of Health (DoH) which can respond to increase in demand through the expansion of existing or provision of new facilities/services. The nearby Armadale Hospital is identified as a Public Purpose – Hospital Reserve in the City's TPS4, and there are undeveloped areas of the site that may be used for additional/new facilities by the DoH. The hospital services a very large regional catchment and the population increase from the Structure Plan area is minor in this context.

Recommendation on 3b

Not supported.

Issue 3c

The submitters advise of concerns regarding the adequacy of service (utility) infrastructure including the capacity of water, power and sewer and telecommunications to service future housing in the Structure Plan area and impact on service provision to the local area.

Comment

The Structure Plan's Servicing Report identified that water, sewer, power, gas and telecommunications are all located within the vicinity of the Structure Plan area. The Structure Plan was referred to relevant service providers including Western Power, Telstra, Water Corporation and ATCO Gas and the reply comments of ATCO Gas and the Water Corporation are detailed below under section State Government Agencies' Submissions.

The landowners/developers of the Structure Plan area will be responsible for providing utility services to future lots to the standards of the relevant service provider to meet statutory requirements.

Recommendation on 3c

Not supported. Service provision is addressed in the Servicing Report and through the future provision of services by the developer in accordance with the relevant service provider standards.

Issue 3d

The submitters advise of concerns regarding the capacity of local commercial services to service future residents in the Structure Plan area and impacts to local residents due to increased demand.

Comment

The proposed population in the Structure Plan area is not likely to have a negative impact on existing commercial services but rather would support the existing commercial services. The City's TPS4 includes District Centre zoned land along Albany Highway in Kelmscott and Strategic Regional Centre zoned land in Armadale City Centre which can be developed for a wide range of commercial land uses and activities. The City's *Retail (Commercial) Centres' Strategy, (January 2021)*, indicates growth of retail floorspace in these centres which will service a broader catchment including the Structure Plan area.

Recommendation on 3d

Not supported. Additional population would support existing commercial centres and local businesses and their growth.

Issue 3e

The submitters advise of concerns regarding the adequacy of public transport (buses and trains) in the locality to service the Structure Plan area including the temporary shutdown of train services.

Comment

The Structure Plan area is within 460 metres walking distance of the following bus services:

- 240 bus which services the adjacent east Kelmscott foothills area and connects to the Kelmscott train station/bus interchange, and
- 220 service on Albany Highway that connects to Armadale train station and the Perth CBD. The Armadale train line reopened in October 2025.

Recommendation on 3e

Not supported. Development of the Structure Plan area will not have a detrimental impact on public transport services and is likely to increase public transport use.

Issue 4 - Bushfire Safety Concerns

Issue 4a

The submitters advise that the locality/Structure Plan area is in bushfire risk area and lacks adequate escape routes. During the 2011 Kelmscott bushfires, local roads e.g., Clifton Street and Gilwell Avenue became congested, and Connell Avenue (which connects to Tonkin Highway) was closed to traffic by emergency services, so evacuation was delayed. The proposed additional housing/residents will exacerbate the problem of evacuation in bushfire emergencies. Some submissions also expressed the need for an additional traffic bridge e.g., at Brookside Avenue/Turner Place to improve access/bushfire evacuation.

Comment

The Structure Plan's Bushfire Management Plan (BMP) indicates that the site meets the vehicle access requirements of the WAPC's *SPP 3.7 Planning for Bushfire Guidelines* for two sealed road routes in two different directions to two suitable locations as follows:

- Albany Highway via Clifton Street, Gilwell Avenue or Page Roads; and,
- Tonkin Highway via Clifton Street, Brookside Avenue and Connell Avenue.

The Department of Fire and Emergency Services (DFES) in its submission on the Structure Plan's BMP did not raise specific concerns regarding compliance with vehicle access requirements of *SPP 3.7 Planning for Bushfire Guidelines* but did raise other concerns which are discussed below under section Government Agency Submissions.

Recommendation 4a

Not supported. Bushfire evacuation routes are addressed by the Structure Plan's BMP.

Issue 4b

The submitters advise additional housing/people (especially the vulnerable e.g. elderly and retirees) should not be introduced into the Structure Plan area due to bushfire risk in the area.

Comment

The Structure Plan's BMP indicates that development would reduce the bushfire hazard to an excluded or low threat level over most of the Structure Plan area and to some areas on the east side of Clifton Street. Some residual bushfire hazard mostly from the proposed Canning River POS and foreshore reserve would remain. This remaining fire hazard impacts a relatively small portion of proposed residential cells in the Structure Plan area and is one of several issues with the BMP identified by the City and DFES to be resolved.

Prior to the advertising of the Structure Plan, the City requested justification for a retirement village use which had been indicated for Lot 1 (No.11) Clifton Street on a preliminary Structure Plan Map, however the Applicant chose to remove the retirement village proposal from the Structure Plan. The Structure Plan Map was changed but reference to the retirement village still remains in the Structure Plan report and technical reports which should have been

removed. It is noted that retirement villages can be considered for approval on Residential zoned land in TPS 4.

Recommendation on 4b

Not supported. A revised BMP should address bushfire hazard/risk in the Structure Plan area and remaining reference to the retirement village use in the Structure Plan report and technical reports should be removed.

Issue 5 - Social Impact Concerns

Issue 5a

The submitters advise that Clifton Hills' locality is for families to raise children and small housing that would be developed under the densities proposed is not suitable for families.

Comment

The City supports housing and household diversity especially in locations with nearby services and amenities. The 2021 Census data for Kelmscott (east), inclusive of the Clifton Hills area indicates that 89% of dwellings are single houses and 10% are medium density houses. 87% of houses have 3 or more bedrooms while only 8% are 1 to 2 bedrooms' dwellings. The densities proposed in the Structure Plan would assist in providing smaller dwelling types (1 and 2 bedroom dwellings suitable for a variety of households e.g. younger singles, couples or older couples looking for options to downsize and age-in-place) that are currently under-represented in the locality. Housing with 3 or more bedrooms for larger family households would likely still be part of the development in line with surrounding areas.

Recommendation on 5a

Not supported.

Issue 5b

The submitters advise of concern that new residents in the Structure Plan area will be people of low-socio economic status (including Homeswest) and/or result in increase in anti-social behavior and crime i.e. break-ins, illicit drug use, illegal dumping, rubbish and noise.

Comment

The City supports a variety of housing, including affordable options especially in locations such as the Structure Plan area which is near services and amenities. The Structure Plan design meets the requirements of the City's Local Planning Policy *PLN 3.14 Designing Out Crime* (PLN 3.14) through the following design elements:

- residential areas are orientated to the public realm i.e. roads and parks for surveillance;
- the design provides for connectivity to future development areas to the south and to the broader Clifton Hills area; and,
- the City can apply further design elements of PLN 3.14 to subsequent planning/development proposals.

There is no information to suggest the Structure Plan will result in any of the potential concerns raised by submitters.

Recommendation on 5b
Not supported.

Issue 6 - Change/loss of Character and Visual Amenity

Issue 6a

The submitters advise of concerns regarding negative impacts and/or loss of: rural style community and/or old town feel; beauty and scenic qualities of Clifton Hills; bushland and rural landscapes; views including to the river; streetscapes; peace and quiet why we live or moved here.

Comment

The scenery and views in the locality comprise a mix of bushland, rural scenery, low density residential and views to the coastal plain. Future development of the Structure Plan area would result in some of the rural scenery and views becoming residential in nature. The provision of the proposed POS and foreshore reserve in the Structure Plan area would preserve some of the bushland scenery and views and importantly create new public access. The City would require a high level of streetscape design including Clifton Street through the subdivision process to address streetscape concerns.

Recommendation on 6a

Supported in part. The proposed POS and foreshore reserve will preserve some of the current character and visual amenity of the locality and streetscape design can be addressed through the subdivision process.

Issue 7 -Traffic and Trasport Infrastructure Concerns

Issue 7a

The submitters raised concerns regarding traffic and pedestrian safety concerns including speeding on Clifton Street.

Comment

The construction of roundabouts at the intersections of Tara Way/Clifton Street and Butler Pass/Clifton Street as part of the development of the Precinct could calm traffic and reduce speeding on Clifton Street. A shared path on the west side of Clifton Street would improve pedestrian safety. These road/pedestrian works were not identified in the Applicant's Traffic Impact Assessment (TIA) and Structure Plan. Further, the Department of Transport in its submission has recommended the TIA include a safe walking to school assessment currently not included in the TIA.

Recommendation on 7a

Supported. The TIA/Structure Plan should be modified to consider Local Area Traffic Management to address issues including (but not limited to) speeding on Clifton Street via a roundabout at Tara Way/Clifton Street and Butler Pass/Clifton Street intersections, and pedestrian safety via a shared path on the west side of Clifton Street. The TIA/Structure Plan should also include a safe walking to school assessment. Refer to Attachments for Issues and Modifications Plan.

Issue 7b

The submitters raised concerns regarding inadequate sight distance/lines at the Brookside Ave and Clifton St intersection.

Comment

Structure Plan development provides an opportunity to address sight distance/lines for traffic at the intersection of Clifton Street and Brookside Avenue. Whilst the applicant's TIA does not indicate recent vehicle accidents at this intersection, growth in traffic from Structure Plan development on both these roads will likely increase the potential for accidents at this and other nearby intersections. The City is of the view that the applicant's TIA should address this as an upfront Structure Plan transport issue.

Recommendation on 7b

Supported. The TIA and Structure Plan should be modified to analysis and provide recommendations for the Brookside Avenue/Clifton Street intersection to address traffic management and safety issues that are produced by the potential development. Refer to Attachments for Issues and Modifications Plan.

Issue 7c

Submitters raised concern that the TIA does not account for traffic from Clifton Hills Primary School and future traffic from further residential development in the Canning River Clifton Street Urban Development Precinct and therefore traffic impacts may be understated.

Comments

The WAPC's *Transport Impact Assessment Guidelines* requires a Structure Plan's TIA to consider traffic volumes and impacts from the surrounding land uses within 800 metres of the Structure Plan area including existing and proposed 'major attractors' (i.e. Clifton Hills Primary School) and major changes in land use. The applicant's TIA does not address potential traffic impacts from the abovementioned existing and proposed developments.

Recommendation on 7c

Supported. The TIA should be modified to address the requirements of WAPC's *Transport Impact Assessment Guidelines* including traffic from Clifton Hills Primary School and traffic from future residential development in the rest of the Precinct.

Issue 7d

Submitters raised concerns regarding increased traffic congestion e.g. Clifton Street and Gilwell Ave, the adequacy of road widths, the performance of intersections with increased traffic and the need for a traffic bridge at Brookside Ave /Turner Place.

Comment

The Applicant's TIA identified that development of the Structure Plan area would increase traffic on Clifton St, Brookside Ave, Connell St, Gilwell Ave and Page Rd. The TIA also considered the impact of additional traffic on key intersections – Clifton St/Gilwell Ave, Gilwell Ave/Albany Hwy and Page Rd/Albany Hwy. As discussed, and recommended in Issue 7c above, the TIA needs to consider traffic impacts from existing and future development within 800 metres of the Structure Plan area and not just traffic generated from the Structure Plan area alone. Further, the City, MRWA and Department of Transport have recommended other modifications to the TIA and Structure Plan below. These would likely impact TIA findings and recommendations regarding traffic congestion and intersection performance and the need for road/intersection upgrades including consideration of the need for a traffic bridge at Brookside Ave/Turner Place.

Recommendation on 7d

Supported. The TIA should be modified to address traffic generation from existing and future development within 800 metres of the Structure Plan area and other recommended modifications of the City, Main Roads WA and Department of Transport. The findings and recommendations of a revised TIA should be considered in the preparation of a revised Structure Plan.

Issue 7e

The submitters advise of concerns regarding lack of parking (including illegal parking) in local streets (some associated with Clifton Hills Primary School) and in the Structure Plan area due to higher density housing and the Structure Plan's proposal to accommodate future housing developments' visitor parking in public roads.

Comment

The Structure Plan report states that visitor parking for future housing developments could be accommodated outside the relevant development sites in public roads. The City does not support this proposal and would require all future housing developments to meet their parking requirements as specified under the Residential Design Codes for occupants and visitors in housing development sites. Any on-street parking would be in addition to parking for housing developments. Regarding parking issues at Clifton Hills Primary School, the Structure Plan area is within walking distance (800m) of the School so it is possible that some future students will walk or cycle to school and not add to existing parking and traffic issues.

Recommendation on 7e

Supported in part. Reference to visitor parking for housing developments being provided in public roads should be removed from the Structure Plan report.

Issue 7f

A submitter in the Structure Plan area advises that the Structure Plan map should not show the local road network except for the local road adjacent to the public open space as the provision of roads is dependent on landowner development timeframes.

Comment

The City is of the view that the roads shown on the Structure Plan are generally appropriate, however only two entry roads from Clifton Street (not three as proposed) should be provided. One of these roads should be located opposite Tara Way to create a 4-way intersection, with a roundabout to assist with traffic calming/management on Clifton Street. The City acknowledges that the landowner's development timeframes may influence the location of roads and that this matter can be further addressed at subdivision stage.

Recommendation on 7f

Supported in part. Only two entry roads from Clifton Street (one at Tara Way as a roundabout) should be detailed on the Structure Pan Map.

Issue 8 - Heritage Concerns

Issue 8

The submitters advise of concern regarding impact to Aboriginal Heritage Site (3538) – Canning River, including lack of an assessment report (including survey for artifacts) and

consultation with relevant interest groups (i.e. Aboriginal Land and Sea Council), and impact to 'European' Heritage Site (18987) – Swan Canning Riverpark.

Comment

The City is of the view that the Structure Plan report did not adequately report on Aboriginal Heritage - Canning River Site 3538. The City's preliminary investigation of Department of Planning, Lands and Heritage (DPLH) heritage database and mapping indicates that Site 3538 is classified as a creation/dreaming site and source of Ochre and water, and the site appears to be located within the proposed foreshore reserve. This would generally protect this site from clearing and development, however this is not verified in the Structure Plan report by mapping and commentary. The DPLH has advised that approvals under the *Aboriginal Heritage Act 1972* (AHA) would be required for future works within the subject area so this heritage matter could also be further addressed by the landowner/developer at future subdivision/ development stage.

The Structure Plan report does not identify Heritage Site (18987) – Swan Canning Riverpark as P17887. Similar to Aboriginal Heritage Site 3538, the City's investigations indicate that Heritage Site 18987 is located within the proposed foreshore reserve which would generally protect it from clearing and development works, however, the site should be mapped with commentary provided in the Structure Plan report.

Recommendation on 8

Supported. The Structure Plan report should be modified to map and comment on Aboriginal Heritage Site (3538) – and Heritage Site (18987) – Swan Canning Riverpark and implications if any to the Structure Plan.

Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns

Issue 9a

A submitter within the Structure Plan area advises that the POS and drainage infrastructure is not distributed equitably (evenly) over Structure Plan landholdings; including one landholding has no POS/drainage allocation and there are no cost sharing arrangements provided for or proposed as part of the Structure Plan to compensate landowners contributing more than their equitable share of POS/drainage.

Comment

The allocation of POS in structure plans is made on various grounds including urban planning, environmental, engineering, and equitable sharing where possible. The State Government's *Liveable Neighbourhoods Policy* and *State Planning Policy 2.8 - Bushland for the Perth Metropolitan Region* (SPP 2.8) indicate that environmentally sensitive Bush Forever and CCW classified land should be preserved in POS.

These classified areas are located along the Canning River and occur more on some Structure Plan landholdings than others so the allocation of POS/drainage to preserve these classified areas would result in some landholdings contributing more POS/drainage and other landholdings less. The allocation of POS along the Canning River also widens the foreshore for additional protection of the river environment.

Lot 11 (No.1) Clifton Street (corner Brookside Avenue) does not adjoin the Canning River and has no CCW and Bush Forever classified land, so the Structure Plan Map has not allocated POS/drainage to this landholding. At the subdivision stage, the City could request a

10% POS contribution from Lot 11 (No.1) Clifton Street or an equivalent cash-in-lieu contribution that could go towards providing improvements to the POS adjacent to the foreshore. Under this approach, Structure Plan POS could be limited to contributions from the four lots adjoining the river. These four lots would no longer be burdened by having to provide the POS share for Lot 11 (No.1) Clifton Street.

If Lot 11 (No.1) Clifton Street were subdivided ahead of other landholdings, a temporary drainage basin may be required in the subdivision until ultimate drainage is created by subdivisional development of other landholdings.

Whilst TPS 4 allows for implementation of infrastructure cost sharing arrangements via “Schedule 9B Development Contribution Plans” of the Scheme text and development contribution areas (DCA) on the Scheme Map, they must conform with the requirements of *State Planning Policy 3.6 Infrastructure Contributions*. As such, these are used for larger urban development areas e.g. DCA No.3 which covers areas in the suburbs of Piara Waters and Harrisdale. Such DCAs require landowners to contribute towards major infrastructure, such as major road widenings and upgrades, main drainage works and the acquisition and development of community and recreation sites and centres. The use of a DCA as a mechanism to compensate landowners whose land may be constrained differently from other landowners’ land is not required in this instance where landowners can work together as part of the normal subdivision process. Smaller development (structure plan) areas with fewer landowners therefore need to coordinate amongst themselves for provision of common infrastructure if required.

Recommendation

Supported in part. For the purposes of the Structure Plan, land for POS provision should primarily come from the four lots adjoining the river in order to address State Policy requirements and expectations of a river foreshore. The City would recommend Lot 1 (No.11) Clifton Street provide its 10% POS contribution separately at the subdivision stage and this could form a land component if trees could be effectively retained, or as an equivalent cash-in-lieu contribution to go towards providing improvements to the proposed POS adjacent to the foreshore.

Issue 9b

The submitters advise that the public open space is insufficient/constrained for recreation due to environmental classifications (Bush Forever and CCW) and drainage basins.

Comment

The applicant’s Structure Plan proposes 11.8% of the site area as POS/drainage (excluding the proposed foreshore reserve area). The City, DBCA and Department of Fire and Emergency Service have identified issues and modifications to the POS/drainage that need to be addressed in a revised Structure Plan and technical reports – LWMS, BMP and new foreshore management plan. The proposed POS lacks an area for active/passive recreation in the form of a small pocket park as it is mostly occupied by drainage basins and it is unclear whether the drainage areas are suitable for credit towards POS. Further, the drainage basins are located in the CCW/Bush Forever areas and are identified in the BMP for bushfire protection measures that would compromise rehabilitation of the CCW and Bush Forever land. The POS issues are further commented on in the Analysis section below.

Recommendation on 9b

Supported. The applicant's Structure Plan and relevant technical reports should be modified to provide for a small pocket park in the POS.

Issue 10 – Other Concerns

The submitters advise of:

Property devaluation concerns due to high density development and loss/change to areas character.

The Structure Plan will set an undesirable precedent for similar developments especially along the river.

Concern that the Structure Plan development will cause Council rates to increase.

Comments

Potential effects to property values are not relevant planning considerations for the WAPC in determining structure plans.

The Canning River Clifton Street Urban Development Precinct is zoned Urban in the MRS and Urban Development in TPS4. Other land along the river to the north and south of the Canning River Clifton Street Urban Development Precinct remain zoned Rural under both the MRS and TPS 4. The MRS determines future Urban areas.

The developing landowners would be required to fully fund future subdivision works so City rates will not be used for subdivision works. The City will be responsible for the management of roads, drainage and park assets of any future subdivision.

Recommendation on Issues 10

Not supported.

State Government Agencies' Submissions

Eleven State Government Agencies made submissions which were forwarded onto the Applicant for their consideration and advice prior to this report being prepared. The following is a brief outline of State Government Agency and service (utility) provider submissions. The City's detailed comments and recommendations on these submissions are in the Attachments - Schedule of State Government Agency Submissions.

Telstra

No objections.

Water Corporation

The developers/landowners would be required to provide all water and sewer reticulation to service the Structure Plan area to Water Corporation standards as well as pay infrastructure upgrade contributions.

Department of Education (DoE)

The DoE advises that the Structure Plan area is within the catchments of Clifton Hills Primary School and Kelmscott Senior High School and that the DoE anticipates the dwelling yield of 365 would not significantly impact the accommodation capacity of these schools. The DoE has no in-principal objections to the proposed Structure Plan.

Department of Fire and Emergency Services (DFES)

DFES advise that the Applicant's Bushfire Management Plan (BMP) is inconsistent with the WAPC's *Statement of Planning Policy 3.7 Planning in Bushfire Prone Areas* and the Guidelines; and requires modification prior to DFES support. The main issues are:

- Vegetation management of the POS (including CCW and Bush Forever) as low threat vegetation is not supported by evidence of agreement and responsibility for management by the City;
- A 1% downward slope is applied in determining the bushfire ratings in the river locality however a 5% downward slope is recommended to comply with the Guidelines.
- The BMP does not achieve the WAPC Guidelines' criteria for the location and siting and design of development. Future residential lots would be subject to a bushfire attack level of BAL40/FZ but the Guidelines indicate BAL29 or below is required to meet the abovementioned criteria. Refer to section Bushfire Management Plan below for further comments.

Main Roads WA

The Structure Plan's Transport Impact Assessment (TIA) requires modification prior to Main Roads WA approval. The main issues included:

- Justification for the use of the traffic trip generation rates in the TIA;
- Correction of inconsistencies between the Structure Plan report and TIA on the number of dwellings;
- 2021 traffic survey data is out-of-date due to changes in the road network and requires updating;
- Crash analysis data is recommended for the wider road network;
- Correction of inconsistencies on the number of entry roads from Clifton Street proposed in the Structure Plan report and TIA; and,
- Modifications to traffic modelling values.

Department of Health

No objections, subject to the Structure Plan area being serviced with reticulated sewer.

Department of Planning, Lands and Heritage (Aboriginal Heritage)

The Structure Plan area intersects with the Canning River Aboriginal Heritage site and future works will require approval under the *Aboriginal Heritage Act 1972*.

Department of Water and Environmental Regulation (DWER)

DWER defers its comments/recommendation to DBCA - Conservation and Ecosystem Management Division, Rivers and Estuaries Branch.

Department of Biodiversity Conservation and Attractions (DBCA)

DBCA defers its comments/recommendation to DBCA - Conservation and Ecosystem Management Division, Rivers and Estuaries Branch.

DBCA - Conservation and Ecosystem Management Division Rivers and Estuaries Branch (DBCA -Rivers and Estuaries Branch)

DBCA raises objections to POS, Local Water Management Strategy, Bushfire Management Plan and tree retention on the following grounds:

- All the Bush Forever and CCW land should be MRS Parks and Recreation and protected by a 30-metre-wide buffer;
- Structure Plan requires a Foreshore Management Plan;
- Further information is recommended to support removal of vegetation and to investigate retention of mature trees; and,
- Stormwater management needs to address State Government Policy frameworks and best practice stormwater management by:
 - detaining stormwater higher in the catchment;
 - reducing the size and number basins and pipe outfalls to the Canning River;
 - locating basins outside Bush Forever/CCW; and
 - consider a living stream opportunity on the southern boundary of Lot 12 Clifton Street; and,
- The BMP should be updated to reference the CCW and remove reference to CCW/Bush Forever being managed as low threat vegetation but rather re-vegetated to Forest with appropriate development setbacks.

Department of Transport

The Structure Plan and Transport Impact Assessment should address the following:

- More details on the pedestrian and cycle network than currently detailed in the Structure Plan and TIA;
- A safe walking to school assessment;
- Road cross sections including footpaths in accordance with *Liveable Neighborhoods* policy; and,
- Consideration of future connections to the area to the south.

The Applicant was provided with the State Government and service (utility) provider submissions but did not resolve issues raised within the agreed Structure Plan extension timeframe (end of February 2025).

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 Attachments.

The applicant was provided with the opportunity to address matters identified by the City and State Government agencies but did not resolve them within the agreed Structure Plan extension timeframe (end of February 2025). Although revised Structure Plan documents were received on 8 August 2025, they are considered unacceptable for assessment due to lack of engagement by the applicant with the affected landowners and the impacts on other landowners within the Structure Plan area the result of additional foreshore and POS provision issues discussed below under section - Revised Structure Plan Submission. Accordingly, the assessment below is based on the Structure Plan received on 12 July 2023.

Natural Environment & Tree Retention

The natural environment values of the Structure Plan area were assessed in the applicant's Environmental Assessment Report and the main findings and the City's recommendation are identified under Issue 1 in the Comments section above.

The applicant's Structure Plan report comments that the requirements of City's Local Planning Policy *PLN 2.4 Landscape Feature and Tree Retention* (PLN 2.4) are addressed in the Structure Plan's Environmental Assessment Report, Landscape Plan and Structure Plan Map which identify the proposed POS and foreshore areas wherein trees will be retained.

The applicant's Landscape Plan identifies 39 surveyed Black Cockatoo Habitat Trees in the proposed POS area for retention but the City notes that five of these are in drainage areas and therefore may not be able to be retained under the current design. The proposed foreshore area which was not surveyed likely contains more trees that could be retained but the number is not provided. The Landscape Plan identified the planting of an additional 13 large trees and 23 small trees in the proposed POS and foreshore area. Refer to Attachments for Landscape Plan.

The City is of the view that retention of additional trees outside the proposed POS and foreshore area is dependent on a number of factors including future earthworks, local water management strategy and other subdivision works. The subdivision process allows the City to request a subdivision condition for the identification of vegetation on site worthy of retention. Additional tree retention may be able to be achieved within future road verges and in larger group housing sites if proposed. The creation of POS through subdivision would also allow for revegetation including tree planting.

The City has identified issues and modifications (detailed below) to the proposed POS's recreation and local water (drainage) function and foreshore, environmental and bushfire management. The resolution of these issues and modifications would include consideration of further tree retention in POS.

Housing Density & Built Form

Table 1 below details the densities proposed and estimated dwellings in the applicant's Structure Plan.

Table 1 – Density and Dwellings (single houses)				
R-Code	Minimum Lot Area (m ²)	Average Lot Area (m ²)	Dwellings	%
R40	180	220	37	9 %
R60	120	150	252	64 %
R80	100	120	106	27 %
Total	-	-	395	100 %

The applicant justifies the above proposed densities on the grounds that the Structure Plan area can take advantage of the amenity of the existing and proposed POS adjacent Canning River and the amenity of the Kelmscott District Centre and Kelmscott Train Station.

As discussed under Issues 2a above, the City recommends replacing the R60 and R80 density with R40 as the Structure Plan area is greater than 800 metres walking distance to Kelmscott Train Station.

The recommended R40 densities proposed will assist the City to achieve the objectives of the State Government's Strategic Planning under the *Perth and Peel @ 3.5 million* and *Southern Metropolitan Peel Sub-Regional Planning Framework* for a more consolidated urban form, including medium density housing with diversity of housing types i.e. apartments, villas and town houses to meet the needs of the changing community.

Foreshore & Public Open Space Provision

The Structure Plan proposes the provision of 9924m² as a foreshore reserve to protect the Canning River and provide public access. This is consistent with the proposed 30m wide foreshore reserve identified in the Environmental Review of 2009. The Structure Plan report confirms the proposed foreshore reserve would be required to be ceded free of cost at subdivision stage and this foreshore area can be deducted from the site area for the purpose of calculating POS provision for the balance of the Structure Plan area.

Under the State Government's *Liveable Neighbourhoods* policy, 10% of the gross subdivisible area is required to be ceded for POS. The Structure Plan proposes the provision of 6779m² (11.8%) of POS as outlined in Table 2 below.

Table 2 – Proposed Foreshore and POS Provision						
Lot (No.)	Site Area	Foreshore	Net Site Area	Restricted (Drainage 1:1 Annual Rainfall Interval (ARI))	POS Unrestricted POS	Total POS
11 (1)	7291	0	7291	0	0	0
12(32)	6882	1601	5281	70	596	666
11(15)	15378	2940	12438	200	1273	1473
12(17)	17401	2724	14677	121	3250	3371
1(27)	20297	2659	17638	185	1104	1289
Total	67249m²	9924m²	57325m²	576m²	6223m²	6799 (11.8%)

The following main issues and modifications with the proposed POS provision have been identified:

- The use of the proposed POS for recreation would be limited due to six separate drainage basins. It is not clear in the LWMS whether the remainder of these drainage basins would meet the requirements to be considered unrestricted public open space for credit towards POS;
- A suitable area for a small pocket park has not been identified in the POS and Landscape Plan;
- The proposed POS utilises CCW and Bush Forever for parkland, drainage and bushfire management functions which would preclude protecting and rehabilitating environmental values of the CCW and Bush Forever land;
- The applicant is seeking POS credits for CCW and Bush Forever areas whereas *Liveable Neighbourhoods* policy indicates that such areas should not form part of the required 10% POS contribution but rather be deducted from the site area for calculation of POS. For the Clifton Street (South) Precinct Structure Plan, POS credits were not given to Bush Forever land with overlapping CCW;
- A foreshore management plan was not prepared for the proposed POS and foreshore land to demonstrate how recreation, rehabilitation, landscaping and local water management would be integrated;
- A small portion of CCW land is located within the proposed road reserve and should be in the POS;
- Structure Plan POS should be limited to contributions from the four lots adjoining the river. Lot 1 (No.11) Clifton Street would be required to provide its 10% POS

contribution separately at subdivision stage or an equivalent cash-in-lieu contribution to go towards providing improvements to the POS adjoining the foreshore; and,

- The DBCA objects to the use of the CCW and Bush Forever for parkland and drainage basins and objects to the proposed Local Water Management Strategy (LWMS) and Bushfire Management Plan (BMP) prepared for the Structure Plan. The DBCA is of the view that CCW and Bush Forever should be rehabilitated and that a 30m wide buffer to the CCW and Bush Forever be applied. The DBCA also does not generally support the use of buffers to CCW and Bush Forever areas for drainage infrastructure.

A negotiated outcome between the applicant, the City, DBCA and WAPC through a review of the POS provision, LWMS, BMP and Landscape Plan and preparation of a Foreshore Management Plan was recommended to address the POS issues, but this has not occurred. A negotiated outcome should have due regard to the Structure Plan's Environmental Assessment Report and Public Environmental Review of 2009 which defined the proposed foreshore reserve.

Local Water Management Strategy

The applicant's Local Water Management Strategy (LWMS) for the Structure Plan details how urban run-off (stormwater) from the Structure Plan area will be managed. The LWMS's main proposals are as follows:

- A piped road drainage network directing run-off from the area's four drainage catchments into five drainage basins located in POS. The basins are proposed to be designed and vegetated to remove contaminants and have outlets for overflow into the river. Some of these basins are within land identified as CCW and Bush Forever;
- A separate piped drainage system to direct clean roof run-off into POS detention basins, with the option to bypass basins with clean flows directly into the river. This option is proposed to be explored further at subdivision stage through an Urban Water Management Plan (UWMP), which provides a greater level of detail than the LWMS; and,
- Runoff from paved ground (e.g. driveways) in lots would be partly captured by private gardens, with excess flowing into the road drainage system.

The following main issues with modifications to the LWMS have been identified:

- The LWMS does not consider the area's clay soil infiltration issues and the need for earthworks and fill to improve at source infiltration/detention of stormwater;
- The LWMS does not provide a coherent strategy for drainage but rather defers strategy design to the subdivision stage;
- The impact to trees in the proposed POS and foreshore reserve from drainage infrastructure i.e. basins and outfalls has not been demonstrated;
- A separate drainage network to transport clean roof run-off into drainage basins or directly into the river is not considered practical for a structure plan with multiple landowners and unknown development timeframes resulting in coordination difficulties;
- The number of basins is considered excessive and has the potential to be a significant maintenance burden for the City;
- Inconsistency in basin sizing in the LWMS and preliminary drainage design;

- Basins located within CCW and Bush Forever areas are not supported; and,
- Overland flows entering into Lot 12 Clifton Street from the existing residential area to the east has not been accounted for in the LWMS. Refer to Attachments for Issues and Modifications Plan.

Bushfire Management Plan (BMP)

The applicant's BMP indicates that Structure Plan development would reduce the fire hazard to an excluded or low threat level over much of the Structure Plan area. To address the remaining high-fire hazard areas in the proposed POS and foreshore reserve, the applicant's BMP proposes an Asset Protection Zone (APZ) made up of a 12m wide perimeter road adjacent to the POS and a 10.5m development setback zone for buildings in residential areas facing the proposed POS. Refer to Attachments for Issues and Modifications Plan.

The BMP proposes options to reduce the development setback to 4.5m or 6m via a strip of managed low fire threat vegetation in the POS. The BMP also proposes notifications to be placed on future land titles impacted by high fire risk notifying of the development setback requirements.

The following issues and recommended modifications to the BMP have been identified:

- Residential areas adjacent to the POS are impacted by a Bushfire Attack Level (BAL) of BAL40/FZ. The WAPC's *SPP 3.7 Planning for Bushfire Guidelines* indicates a lower maximum of BAL 29 as an acceptable solution;
- The applicant's 10.5m development setback (and optional 4.5m or 6m proposals) are based on the management of the proposed POS as irrigated parkland for a low threat vegetation status. *SPP 3.7 Planning for Bushfire Guidelines* indicates that new POS and urban water management areas should not be excluded as low threat vegetation unless prior agreement of the City is obtained and the relevant information is included in the BMP. In this regard, the City has not agreed to manage the POS as low threat status and is concerned that the landscaping may not achieve the City's objectives for POS areas;
- The 10.5m development setback is considered excessive and sterilizes a significant portion of proposed residential areas fronting the POS especially where the proposed R60 coding has a minimal front setback of 2m from the road;
- The proposed 12m POS perimeter road width (for fire hazard separation) has not been established through Applicant's TIA and is less than the specified width in *Liveable Neighbourhoods* policy. A wider road, including on-street parking bays (preferably on both sides for visitors) as well as the shared path would assist with fire hazard separation and manage ground levels between the road pavement and POS;
- The proposed managed low fire threat vegetation in the POS includes drainage basins that are proposed to be vegetated for nutrient stripping. This would impact the ability to provide an acceptable level of planting in the drainage basins sufficient to enable nutrient stripping;
- The DBCA does not support CCW and Bush Forever areas being managed as low fire threat; and,
- DFES issues and recommended modifications have not been addressed.

Road Network and Traffic Management

The Structure Plan proposes a grid-style network of east-west and north-south roads, mostly connecting to Clifton Street and an interface road to the proposed POS and foreshore reserve connecting to Brookside Avenue. This interface road includes a shared path on the proposed POS roadside. T-intersections are proposed with give-way signs, and 4-way intersections are proposed with stop signs.

The applicant's TIA for the Structure Plan details and analyses the proposed internal transport network, current external transport network, surrounding area and pedestrian and public transport. The following issues with, and recommended modifications to the TIA have been identified:

- Detailed traffic impact analysis of the surrounding context, including future urban development of the rest of the Canning River Clifton Street Precinct and the existing and potential student numbers at Clifton Hills Primary School is not provided;
- The TIA does not address all the relevant requirements of the WAPC's *Transport Impact Assessment Guidelines*;
- The TIA assumes one access road to Clifton Street, but the Structure Plan map shows three access roads. The City only supports two access road connections to Clifton Street in the Structure Plan area;
- The TIA does not adequately consider requirements for road and bridge upgrades to provide access to the additional residential development and to manage local traffic as required under TPS4 Schedule 8 - Development (Structure Planning) Areas No.44 Provision 44.3 viii);
“servicing and infrastructure requirements including any requirements for road and bridge upgrades to provide access to the additional residential development and to manage local traffic.”
- Details of the Structure Plan's road network, including road hierarchy, reserve widths and cross sections and pedestrian/cycle paths, as well as on-street parking (including on the west side of Clifton Street) are not provided;
- Further detail and analysis of the need for Local Areas Traffic Management for the proposed internal and external road network is not provided e.g. roundabouts at Clifton St /Tara Way and Clifton St /Butler Pass;
- Out-of-date traffic survey data and assumptions are used i.e. based on the Denny Avenue level crossing removal which has now been completed, the impacts of COVID such as volume up-scaling factor and the 2017 traffic count on Clifton Street;
- Use of non-standard vehicle trip rates (the City recommends 8 vehicles per day (vpd) per dwelling in accordance with the *Transport Impact Assessment Guidelines*);
- A safe walking to school assessment has not been provided; and,
- Main Roads WA and Department of Transport issues and modifications as identified in their submissions have not been addressed.

Servicing - Utilities

The applicant's Servicing Report for the Structure Plan established that the utilities required to service the Structure Plan area are located nearby and that upgrades are likely required to increase capacity. The submission of the Water Corporation confirmed the developer's responsibility to provide water and sewer reticulation to the Structure Plan area. The provision of other utilities such as power, gas and telecommunications will also be the developer's responsibility.

Town Planning Scheme No.4 – Schedule 8 Development (Structure Plan) Areas No.44

Provisions under TPS4 Schedule 8 Development (Structure Plan) Areas for Development Area No.44 specify requirements for the Clifton Street Urban Development Precinct for the preparation of a structure plan and supporting technical reports e.g. LWMS before subdivision. These requirements have generally been considered in the Analysis section above and in the Schedule of Issues and Modifications. A table detailing the provisions, the applicant's response and the City's comments are provided below for completeness.

City of Armadale TPS No.4 Schedule 8 Development (Structure Planning) Area Provisions		
Development Area 44 Provision	Applicant's Response	City Officer Comments
44.1 Subdivision shall occur in accordance with a Structure Plan for the Canning River Clifton Street Precinct Urban area which is to be prepared pursuant to the provisions outlined in Part 4 of the Deemed Provisions.	Structure Plan as submitted.	Structure Plan is not satisfactory. Refer to Agenda Report – Analysis section and Schedule of Issues/Modifications in the Report attachments.
44.2 The Structure Plan shall incorporate assessments and recommend design and management responses to the satisfaction of the local government for the following environmental planning factors - (i) Local urban water management; (ii) flora and fauna, heritage sites, conservation category wetlands, bush fire protection and acid sulphate soils.	i) LWMS ii) Environmental Assessment Report, Structure Plan Report - Section 5.8 Heritage and Bushfire Management Plan as submitted.	i) LWMS is not satisfactory. Refer to report section Local Water Management Strategy and Attachments Schedule of Issues and Modifications. ii) The Environmental Assessment Report is generally satisfactory subject to a minor modification i.e. discussion of requirement for fauna relocation at subdivision stage. Structure Plan Report Section 5.8 Heritage is not satisfactory. Refer to Issue 8 Heritage in the Comments Section. Bushfire Management Plan is not satisfactory. Refer to report section Bushfire Management Plan and Attachments Schedule of Issues and Modifications. Portion of the site is identified as high to moderate risk of Acid Sulphate Soils (ASS) however no ASS assessment is provided.
44.3 The Structure Plan shall make provision for -	44.3(i) R40, R60 and R80 densities propose resulting in	44.3(i)The R60 and R80 density (high density under

(i) a variety of lot sizes and high-quality residential dwellings and respond to the preferred concept outcomes of the Canning River Precinct Study (Consolidated Scenario 4); (ii) protection of valued vegetation located within or adjacent to the Martin Street road reserve including options regarding the potential heritage rose bush in the vicinity of the original Martin house; (iii) providing an archaeological watching brief in the River Road Heritage Precinct Class B zone, which is the indicative site of the former historic police barracks; (iv) suitable provision of 10% standard Public Open Space contributions, predominantly by augmenting and extending the width of the Canning River foreshore reserve area, creating pocket parks, or in accordance with policies of the Western Australian Planning Commission equivalent cash in lieu contributions which can be used to improve public recreation opportunities and facilities in the foreshore POS reserve areas; (v) providing Canning River foreshore reserves and management; (vi) investigation of solar access opportunities for housing at medium and above densities; (vii) a Local Water Management Strategy to be prepared in consultation with the DoW and the local government; and (viii) servicing and infrastructure requirements including any requirements for road and bridge upgrades to provide access to the additional residential development and to manage local traffic.	a mix of lot sizes. 44.3(ii) NA 44.3(iii) NA 44.3(iv) 6203m² of public open space provided adjacent to foreshore reserve including CCW/ Bush Forever areas and local water management basins and pipe outfalls to river. 44.3(v) Foreshore 9931m² corresponding to TPS 4 Rural Living Zone land. Foreshore Management Plan (FMP) not submitted. 44.3(vi) Statement Page 10, <i>“future development density increases as the AHD of the site slopes down. This has been done in order to ensure all lots enjoy as much sunshine as possible throughout the day.”</i> 44.3(vii) LWMS proposals as discussed in the Analysis section heading Local Water Management Strategy. (Note DoW have deferred to the DBCA - Rivers and Estuaries Branch to provide comment/ recommendation on the Structure Plan. 44.3(viii) Servicing Report as submitted. Transport Impact Assessment (TIA) as submitted.	the R-Codes) is not supported. Refer to report section Comments Issue 2 and Attachment Schedule of Issues and Modifications. The Structure Plan, Transport Impact Assessment and the Local Water Management Strategy need to be revised to address the reduction in housing density. 44.3(ii) NA outside Structure Plan area 44.3(iii) NA outside Structure Plan area 43.4(iv) Public Open Space is not satisfactory. Refer to report section Public Open Space 7 Foreshore Reserve and Attachments for Schedule of Issues and Modifications. 44.3(v) Foreshore Land provision is satisfactory however a Foreshore Management Plan was not submitted. 44.3(vi) reword statement to <i>“housing in north-south and east-west road network allows for dwelling solar orientation”</i>. 44.3(vii) LWMS is not satisfactory. Refer to Report Section Local Water Management Strategy and Attachments - Schedule of Issues and Modifications. 44.3(viii) Servicing Report is satisfactory. TIA is not satisfactory. Refer to report section Road Network and Traffic Management Attachments - Schedule of Issues and Modifications.
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REVISED STRUCTURE PLAN SUBMISSION

In response to City's and State Government agencies' issues and modifications, the applicant on the 8 August 2025 submitted the following revised or new Structure Plan documents:

- Structure Plan Report (Parts 1 and 2) and Map
- Local Water Management Strategy
- Bushfire Management Plan
- Traffic Impact Assessment
- Foreshore Management Plan (new)
- Mosquito Management Plan
- Landscape Plan

Refer to Attachments for Revised Structure Plan Map.

The applicant has advised that the revised/new documents have not been reviewed by other landowners in the Structure Plan area nor have servicing authorities that requested modifications or raised issues in their submissions been consulted in preparation of the revised/new documents. The other Structure Plan reports - Servicing Report, Environmental Assessment Report and Erosion Sediment Worksheet remain unchanged from those in the Applicant's original Structure Plan proposal.

The revised Structure Plan proposes significant modifications particularly, in respect to POS and river foreshore provision in response to the DBCA's submission which recommended among other modifications the following:

- all CCW and Bush Forever land be included in the foreshore reserve; and,
- a 30m wide revegetation buffer be applied to the CCW in POS.

The main Structure Plan modifications and the City's comments and recommendations are as follows.

Foreshore Reserve (regional open space) & Public Open Space

The proposed foreshore reserve (regional open space) is 1.36 hectares (originally proposed 9931m²) and includes all CCW and Bush Forever land in the Rural Living and Urban Development zones of TPS4. The proposed foreshore reserve increases from 15% to 20% of the Structure Plan area in the Revised Structure Plan.

The Environmental Review of 2009 and the MRS Amendment (MRS 1202/41) established the extent of the foreshore reserve as a 30m wide reserve (buffer) either side of the river waterway (channel) which is consistent with the Rural Living zoned land. The rationale for the 30m wide reserve (buffer) is discussed under Issue 1e in the Comments section of this report above.

The applicant's Revised Structure Plan proposes POS of approximately 1.60 hectares (originally proposed 6679m²) comprising a 30m wide revegetation buffer to the CCW, two drainage areas and local parkland for recreation. The applicant's POS Schedule indicates that 1.13 hectares of the POS is restricted POS (wetland buffer and portion of drainage basins) that cannot be credited as POS in accordance with *Liveable Neighbourhoods*' policy methodology. The total area of land for the proposed POS (credited and uncredited) would comprise 23% of the Structure Plan area and, when combined with the proposed foreshore reserve, a total of 2.96 hectares or 44% of the Structure Plan area would be allocated to POS and foreshore reserve. The applicant's Revised Structure Plan's POS and Foreshore provision

should have been prepared with engagement with affected landowners in the Structure Plan area and between the applicant, the City, the DBCA and the WAPC. Whilst the City does support the revegetation of the foreshore land and POS (CCW/Bush Forever land) for the purpose of improving the environmental values of the Canning River, there is a concern that the affected landowners have not been provided the opportunity by the applicant to be consulted on their willingness to cede and landscape additional foreshore and POS areas, when compared to the advertised Structure Plan and the WAPC's Policy requirements.

Other Structure Plan Modifications

The following other major Structure Plan modifications are proposed:

- a simplified road layout with additional roads to be determined at subdivision stage;
- R40 residential density (R60 and R80 are no longer proposed); and,
- revised Structure Plan Report, LWMS, BMP, Landscape Plan and new Foreshore Management Plan (FMP).

The City considers that a detailed review of the other Structure Plan modifications above is not warranted as they are based upon proposed POS and foreshore provision that has not been developed with all affected landowners in the Structure Plan area and therefore may not have their support. Further, public re-advertising and referral to State Government agencies of the revised Structure Plan documents would not be appropriate this late in the Structure Plan process, when the applicant should have undertaken appropriate engagement with the affected owners as part of the preparation of the Revised Structure Plan and it is likely the affected owners will not be supporting the proposals.

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

The following options are available to Council:

1. Resolve to recommend that the WAPC approve the Structure Plan with modifications to address the issues and modifications as outlined in this report and its attachments, or by providing alternative modifications and issues with reasons for its decision; or
2. Resolve to recommend that the WAPC approve the Structure Plan without modification; or
3. Resolve to recommend that the WAPC refuse the Structure Plan as the issues and modifications outlined in this report and its attachments have not been addressed to the satisfaction of the City and State Government agencies - Department of Biodiversity Conservation and Attractions, Fire and Emergency Services, Main Roads WA, and Department of Transport.

CONCLUSION

The Structure Plan, as received on 12 July 2023, has been advertised and assessed in accordance with the requirements of the *Planning and Development (Local Planning Schemes) Regulations 2015*. The applicant was provided with City and State Government agencies' (Department of Biodiversity Conservation and Attractions, Fire and Emergency Services, Main Roads WA, and Department of Transport) issues and modifications, however they were not resolved by the applicant within agreed extensions to the structure plan processing timeframe.

The applicant lodged Revised Structure Plan documents on 8 August 2025, however they are not considered acceptable on the grounds that the applicant has not engaged with the other landowners in the Structure Plan area in the preparation of the Revised Structure Plan on the additional POS and foreshore provision.

Given the above, the City recommends Option 3 above, that the WAPC refuse the Structure Plan as the issues and modifications outlined in this report and its attachments have not been addressed to the satisfaction of the City and relevant State Government agencies - Department of Biodiversity Conservation and Attractions, Fire and Emergency Services, Main Roads WA, and Department of Transport.

ATTACHMENTS

1. Aerial of Structure Plan Area
2. Proposed Structure Plan Map - Canning River Clifton St (North)
3. Walkability Plan
4. Issues and Modifications Plan
5. Landscape Plan
6. Schedule of Submissions
7. Schedule of Structure Plan Issues and Modifications
8. Confidential List of Names and Addresses of Submitters - *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*
9. Confidential Local Area 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*
10. Revised Structure Plan Map

COMMITTEE RECOMMENDATION

D1/11/25

That Council:

- 1. Endorse the comments made in this report, the Schedule of Submissions - Summary and the Schedule of Structure Plan Issues and Modifications, both attached to this report, in response to advertising, agency referrals and assessment of the Structure Plan with the following amendments:**
 - **The schedules to be amended to reflect all the Bush Forever and CCW land should be protected by a 30 metre wide buffer;**
 - **Any reference to POS for Lot 11 **Brookside Avenue** to refer to 10% POS being provided as land and not as cash-in-lieu.**
- 2. Pursuant to Schedule 2 Clause 20 of the *Planning and Development (Local Planning Schemes) Regulations 2015*:**
 - a) Forward this report and attachments (including Confidential Schedule of Submissions and Schedule of Structure Plan Issues/Modifications as amended by Point 1 above) to the Western Australian Planning Commission; and,**
 - b) Recommend that the Western Australian Planning Commission refuse the proposed Canning River and Clifton Street (North) Precinct Structure Plan, **(dated 10 May 2023)** as the issues and modifications detailed in this report and the Schedule of Structure Plan Issues and Modifications (as amended by Point 1 above), inclusive of the objections, issues and modifications recommended by the DBCA-Rivers and Estuaries Branch, Main Roads WA, Department of Fire and Emergency Services and Department of Transport (attached to this report) have not been addressed.**
- 3. Advise submitters of the Council's recommendation to the WAPC and when the WAPC makes its decision on the Structure Plan.**

**Moved Cr J Keogh
MOTION CARRIED**

6/0

Council resolved at its Ordinary Meeting on 24 November 2025 that Recommendation D1/11/25 be amended to read as above.

1.2 - DEVELOPMENT APPLICATION - PLACE OF WORSHIP - 8 WYGONDA ROAD, ROLEYSTONE

WARD : HILLS

FILE No. : M/563/25

APPLN NO. : 10.2025.14.1

DATE : 11 November 2025

REF : KC

RESPONSIBLE MANAGER : EDDS

APPLICANT : Harley Dykstra

LANDOWNER : S and E Wee

SUBJECT LAND : Property size: 0.4936ha

ZONING : Urban

MRS / : Residential R5

TPS No.4 : (Additional Use No.3)

In Brief:

- The application involves the conversion of an existing building to a Place of Worship accommodating a maximum of 120 worshippers. The existing single house onsite is proposed to be retained as a residence.
- Place of Worship is a discretionary 'A' use in the Residential zone. The application was advertised for a period of two weeks. 395 submissions were received. The main matters raised in submissions include parking and traffic, and noise generation.
- Issues identified in submissions and through the City's assessment have been addressed by the applicant or are capable of being addressed through conditions of approval.
- Recommend that the Council approve the application subject to appropriate 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

- 2.5 Quality development that enhances the amenity and liveability of the City.
- 2.5.6 Seek improvements to the nature and standard of developments within the City.

Legal Implications

Health Act 2011

Environmental Protection (Noise) Regulations 1997

Planning and Development Act 2005

Planning and Development (Local Planning Schemes) Regulations 2015

Town Planning Scheme No.4 (TPS4)

Local Planning Strategy 2016

Metropolitan Region Scheme

State Planning Policy 3.7 *Bushfire*

Council Policy/Local Law Implications

Nil.

Budget/Financial Implications

Nil.

Consultation

1. Development Control Unit (City of Armadale)
2. Neighbouring Landowner Consultation
3. Advertising on the City's website.

BACKGROUND

The subject site is located at Lot 500 (No.8) Wygonda Road in Roleystone. The site contains an existing commercial building which previously accommodated a private recreation facility (squash courts) and café. A single dwelling is located to the rear of the site which was approved in 1989.

The building subject to the proposed conversion to Place of Worship was constructed prior to 1989, originally for Special Use No.8 in the City's *Town Planning Scheme No.2* (TPS2) – Squash Courts and Ancillary Leisure Activities. 24 car parking bays are currently on site (2 of these being ACROD bays) to service this building.

TPS2 was repealed in November 2005 and replaced by the current Town Planning Scheme No.4 (TPS4). Under TPS4 the subject site was zoned 'Residential' (R5) and Special Use No.8 under TPS2 was transferred to Additional Use No.2 of Schedule 2 under TPS4. The Squash Courts and Ancillary Leisure Activities are consistent with the definition of 'Recreation – Private' under this Additional Use.

Additional Use No.3 includes conditions and requirements as follows:

1. "All 'P' land use classes listed for the base Residential zone shall be 'D' (discretionary),
2. In determining any planning application for development approval, the City shall have regard to the compatibility of proposed uses with the existing use of the site and any additional uses, which are permissible under the Additional Use provisions."

DETAILS OF PROPOSAL

The subject application is for a Place of Worship use at Lot 500 (No.8) Wygonda Road, Roleystone. The proposal involves the following main elements:

- The Change of Use of the former squash courts and leisure centre to a Place of Worship with seating for 100-120 attendees.
- A weekly service held from 9:30am-1:30pm on Sunday.
- A Sunday evening meeting held monthly from 6pm on Sunday with 50-70 attendees.
- Regular mid-week services scheduled for Wednesdays or Fridays from 6pm to 9pm for a maximum of 60 attendees.
- Youth group meetings on Saturdays once or twice a month with 20 attendees.
- Ad-hoc special meetings occurring on weekends when visiting Ministers are present.
- Occasional board meetings with up to 20 attendees.
- Counselling services are available for individuals, couples and families within the congregation.
- The reconfiguration of the driveway to allow for two-way traffic and construction of additional parking bays to provide onsite parking for the congregation.
- The existing dwelling on the property and associated outbuildings are shown to be retained. The applicant has indicated that the dwelling will be rented out to members of the congregation or the general public.
- Internal modifications to the building layout.
- Tree retention.

In support of the application, the following documentation has been provided by the applicant:

- Environmental Acoustic Assessment prepared by Herring Storer Associates (June 2025) and a Noise Management Plan (August 2025).
- Transport Impact Statement prepared by PTG Consulting (April 2025).
- Bushfire Emergency Evacuation Plan prepared by Bushfire Logic (January 2025).
- Arborist Report prepared by Treeswest Australia (March 2025).
- Effluent Treatment and Disposal Report prepared by Bayley Environmental Services (September 2023).

COMMENT

Development Control Unit (DCU)

The proposal was referred to the City's Development Control Unit (DCU). Engineering, Parks, Environment, Building and Health have indicated support subject to appropriate conditions being imposed to address tree retention and effluent disposal.

The applicant has provided advice regarding effluent treatment and disposal suitable for Category 3 soils (loams), however the soil type has yet to be determined. Given this, Health Services has recommended the appropriate assessment of the soil before wastewater system works are undertaken as per the standard processes.

Public Advertising

The proposal was advertised for public comment in accordance with clause 64 of the Deemed Provisions.

Total No. of submissions received	: 395
No. of submissions of conditional support/no objection	: 9
No. of submissions of objection	: 383
No. of submissions of comments only	: 3
No. of submissions of advice by Government Service Agencies	: 0

The issues raised by the submissions have been summarised and recommendation made on each submission in the Attachments. Refer to Confidential Attachments of the Agenda for location plan and details of the submitters.

The main issues raised in submissions, together with a comment on each issue, are outlined below.

Key Issues

Issue 1 – Allocating central space in Roleystone to a single religious organisation could limit the availability of venues for other community events and gatherings. The scale of the proposed use is not compatible with the area.

Comment

The City's TPS4 Zoning Table lists a Place of Worship as an 'A' use within the Residential zone, which means that the use is not permitted unless the local government has exercised its discretion by granting development approval after giving special notice in accordance with clause 64 of the Deemed Provisions.

A Place of Worship is defined by TPS4 as a:

"premises used for religious activities such as a church, chapel, mosque, synagogue or temple."

The proposed land use is considered to be consistent with the objectives (b) and (c) of the zone as outlined in TPS4, which include:

- b) To provide for a range of associated compatible activities and development, which will assist in the creation of efficient and sustainable residential neighbourhoods.
- c) To facilitate and encourage high quality design, built form and streetscapes throughout residential areas.

In addition, the subject site is in proximity to the following:

- Local Centre zoned land (including Roleystone shopping centre) 50m to the west;
- Additional Use No.5 (Roleystone Family Medical Centre) 10m to the west;
- Additional Use No.26 (office premises) immediately adjoining western boundary of the subject site; and
- Roleystone Country Club (immediately adjoining the eastern and southern boundary of the subject site), including portion of site identified for Additional Use No.40 (office premises, undeveloped)

Recommendation

That the issue is not supported.

Issue 2 – The existing road networks are not suitable for the increase in traffic, resulting in congestion, particular on weekends with sporting events and markets held at the oval. The increase in traffic could result in safety issues for pedestrians.

Comment

The existing road networks and traffic volumes are considered in the applicant's Transport Impact Statement (TIS). Wygonda Road is a Local Distributor road with 2 lanes and 1 footpath, with a 50km/hr speed limit. The applicant's TIS estimates a peak generation of 42 vehicles during the weekend peak period for the proposed land use. The applicant's TIS further outlines that the service hours proposed means the use is not operational during the weekday AM periods. The applicant's TIS notes that the PM period trips are significantly lower compared to the weekend peak.

The applicant's TIS states that the Place of Worship "weekend peak is generally around noon, which coincides with the end of the worship service, when most visitors will be leaving." In addition, the applicant's TIS suggests that "most visitors to the site are families, which are assumed to arrive together, therefore it is assumed that there will be an average of 3 people per vehicle."

The applicant's TIS concludes that the existing road network has capacity for the additional volume of traffic generated by the proposed land use.

Recommendation

That the issue is not supported.

Issue 3 – Insufficient on-site parking has been provided. Without adequate provisions, it is highly probable that overflow parking would spill into the country club's facilities or into on-street parking.

Comment

The TPS4 Schedule 7A 'Car Parking Standards' give provisions for the minimum parking requirements for a Place of Worship. The proposal includes a seating area of 88m² and Schedule 7A requires 1 space for every 2.5 square metres of seating area. 35 parking bays are required to satisfy this requirement, plus 1 space for every staff member present during peak operation. The applicant has confirmed 1 staff member is present during these times.

Following advertising the parking provisions were updated to provide a total of 43 parking bays, excluding those associated with the existing caretaker's dwelling. This addresses the 42 vehicle trips noted in the applicant's TIS and provides parking which exceeds the requirements of TPS4 Schedule 7A.

It is recommended that if the application is approved, a condition be imposed requiring that car parking demand shall not exceed the number of parking bays approved for the development, being 43 vehicle bays, at any one time. Car parking demand should be accommodated within the site at all times.

Recommendation

That the issue is supported.

Issue 4 – Roleystone is known for its welcoming and inclusive community, emphasising safety, transparency, and a zero-tolerance policy for abuse. The community is built on atmosphere, on safety, on how people feel walking down their street or sitting in the café next to the town hall. The safety of residents should be preserved.

Comment

The City's Local Planning Policy – *Designing Out Crime* (PLN 3.14) guides effective design of building and plans using Crime Prevention Through Environmental Design principles, providing guidance in relation to build outcomes that assist in supporting the reduction in actual and perceived crime and anti-social behaviour.

The applicant has indicated that the requirements of the policy have been met by submitting the Crime Prevention Through Environmental Design checklist with the proposal. The proposed use and building works do not propose any elements that would be inconsistent with these elements.

Recommendation

That the issue is not supported.

Issue 5 – An increase in patronage of this scale will adversely impact the quiet residential amenity currently enjoyed by the community. The cumulative impact of weekly, evening, and weekend activities, including youth and community meetings, would result in a level of noise, activity, and disturbance incompatible with the expectations of residents in a low-density residential area.

Comment

The applicant's Acoustic Report identifies that noise sources include singing, playing music inside the building during services and car movements on site. The applicant's Noise Management Plan (NMP) requires that potential noise emissions from singing/music are confined to inside the facility and not be audible outside of the building if the doors and windows are closed, therefore achieving compliance with the *Environmental Protection (Noise) Regulations 1997*. In addition, the applicant's Noise Management Plan has noted that amplified music is to cease by 9pm each night.

The applicant's Acoustic Report identifies that noise associated with car movements from the proposed Place of Worship would comply at all hours in all directions, excepting the residential site at 10 Wygonda Road, Roleystone. The applicant's Acoustic Report recommends implementation of a minimum 1800mm solid continuous barrier for the area adjacent to the carpark, and restriction of the four westmost car bays outside of the day time period to mitigate car noise to 10 Wygonda Road, Roleystone. The applicant's Acoustic Report notes that this barrier must be solid and continuous with no gaps. The applicant has confirmed that this barrier would be composed of brick or limestone. The applicant's Acoustic Report advises that this wall must extend at a minimum to equal with the building's north façade and continue as far north as practicable.

It is recommended that if the application is approved, a condition be imposed requiring compliance with the Acoustic Report and Noise Management Plan. An advice note should be included advising that at all times the noise levels must comply with the requirements of the *Environmental Protection (Noise) Regulations 1997*.

Recommendation

That the issue is supported.

Issue 6 – There appears to be limited community consultation in the planning stages of this proposal. Given the substantial impact this change of use may have on the neighbourhood, I believe wider engagement with residents should have been prioritised before the submission of this application. Many are questioning the transparency and financial ethics behind the approval of such projects, particularly given the scale and frequency of similar applications being passed.

Comment

Place of Worship is a common land use in town sites, residential and commercial areas. The proposed land use is one that a landowner can apply for and can be considered in Residential areas.

Consultation for the development application has been undertaken as per the requirements of the relevant legislation. This report and other reports are publicly available on the City's website or Western Australian Planning Commission's website for Development Assessment Panels (DAPs) where the DAP is the decision maker. Places of Worship are able to apply for an exemption from paying local government rates.

Recommendation

That the issue is not supported.

Issue 7 – Remnant native bushland is located on the subject site. A change of use that intensifies the site's use may result in vegetation clearing. The established Jarrah trees should be protected. This natural buffer enhances the area's amenity and character.

Comment

An Arborist Report was submitted by the applicant in March 2025. The site comprises of 17 trees, with high value for habitat and food source for native species. The trees have retention value in their current state. Accordingly, the applicant has designed the proposed additional car parking bays around the existing vegetation and confirmed that no native vegetation is proposed for removal.

It is recommended that if the application is approved, a condition be imposed requiring a landscaping plan which demonstrates the retention of existing trees and tree protection in accordance with AS 4970 – 2009 'Protection of Trees on Development Sites'.

Recommendation

That the issue is supported and can be managed via conditions.

Issue 8 – There are no details on modifications to elevations to ensure the architectural landscape and visual harmony of our semi-rural region is maintained.

Comment

The applicant has confirmed that no changes are proposed to the roof or elevations of the existing buildings. It is recommended that a condition be imposed requiring external colours and materials to be in keeping with the surrounding character and amenity of the locality.

It is recommended that a condition be imposed requiring external colours and materials to be in keeping with the surrounding character and amenity of the locality.

Recommendation

That the issue is noted.

Issue 9 – A previous fire in 2011 in the area burned through houses, destroying around 72 homes. Fires move quickly, and burn ferociously in urban areas and bushland, and are increasingly likely to occur due to a changing climate, more extreme conditions and a drying landscape.

Comment

Part 8 of the *Planning for Bushfire Guidelines* (Guidelines) notes that:

“There are no requirements under State Planning Policy 3.7 or the Guidelines [...] for these existing buildings to be located within an area with a radiant heat impact not exceeding 29 kW/m² (BAL-29).”

To address this concern however, it is recommended to include a condition requiring the applicant to adhere to Appendix B, Table 9 of the Guidelines in terms of managing fire fuel load.

This requires the fuel load to be:

- Managed and removed on a regular basis to be maintained as low threat vegetation;
- Maintained at less than two tonnes per hectare (on average); and
- Mulches should be non-combustible such as stone, gravel, shells, rock or crushed mineral earth or wood mulch more than five millimetres in thickness.

This approach balances the preservation of native remnant vegetation with the reduction of fuel load on the ground.

An advice note outlining the technical requirements for the establishment of an asset protection zone and the installation of ember protection screens to any evaporative air conditioning units is recommended.

Recommendation

That the issue is supported.

Issue 10 – May I suggest that if this application has merit that restrictions are put in place. Without enforceable conditions, local amenity and safety will be compromised.

Comment

Appropriate conditions will be imposed to mitigate potential impacts on local amenity. In formulating conditions, planning authorities must adhere to the ‘Newbury Principles’, which have been developed in case law to ensure that any conditions imposed on a development application:

- Serve a planning purpose by directly relating to the development and its impacts on the surrounding area;
- Be fair, and reasonably related to the development; and
- Not be so unreasonable that a reasonable planning authority could not have imposed it.

Application of these principles ensures conditions are proportionate to the scale and nature of the proposal.

It should also be noted that planning authorities have the ability to monitor compliance with conditions. Non-compliance may result in enforcement actions, such as notices or penalties, under the *Planning and Development Act 2005*.

Recommendation

That the issue is supported.

Issue 11 – Will the sewerage system cope, given the age of the building and that the original building was never built to cope with these numbers?

Comment

The approved plans for the existing buildings show the effluent system for the hall as consisting of two septic tanks and three 7m leach drains. The septic tanks are located beneath a concrete driveway. The area of the leach drains is brick-paved and separated from the bitumen driveway by mountable kerbing, suggesting that it may have been used in the past for ad-hoc parking by previous operators. This is inconsistent with the *Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974*, which require leach drains to be unpaved and not subject to vehicular traffic.

The existing system is designed to accommodate a maximum of 45 persons per day with food preparation or 135 persons without food preparation. In order to increase the capacity of the system to accommodate the proposed number of patrons, it is proposed to install a holding tank to spread the effluent load over a full week. In view of the absence of site specific soil test data, the leach drain sizing has been revised based on a Design Loading Rate of 15mm/day as specified in AS1547:2012 for Category 3 soils (loams).

On this basis, two 12m leach drains will be required. The leach drains will be setback at least 1.8m from buildings and boundaries and 1.2m from any trafficable areas. The edge of the existing driveway will be pulled back to ensure a 1.2m clearance from the leach drains. The applicant proposes that the existing brick paving above the leach drains will be removed and replaced with a soft surface such as grass or shallow-rooted garden plants, bringing the system into compliance with *Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974*.

The effluent system for the existing residence complies with its approved plans and will continue to be used to service the residential dwelling. No alteration to this system is necessary or proposed.

It is recommended that a condition of the approval be imposed requiring a Site and Soil Evaluation to ensure the proposed system is appropriate for the site conditions.

Recommendation

That the issue is supported and can be resolved via conditions.

Issue 12 – Additional outdoor lighting from buildings or parking areas could disrupt nearby properties, particularly at night.

Comment

The issue can be addressed by including an advice note should the application be approved, advising that lighting shall comply with Australian Standard 4282-1997 “*Control of the*

obtrusive effects of outdoor lighting” or its equivalent and the City’s Environment, Animals and Nuisance Local Laws 2002.

Recommendation

That the issue is supported.

Issue 13 – With the extra bitumen area, will the existing stormwater drain cope with the extra run off?

Comment

Detailed drainage design is considered and managed usually through conditions and submission of plans for such large lots. It is recommended that drainage requirements are conditioned requiring submission of a stormwater management plan incorporating water sensitive design principles to the City for its approval.

Recommendation

That the issue is noted.

ANALYSIS

The following discussion considers the application’s compliance with TPS4 requirements.

Town Planning Scheme No 4, Part 4A – Residential Zone Requirements

Setbacks and Heights

All proposed structures are existing on-site. All setbacks and building heights are compliant with TPS4 provisions.

Car Parking and Vehicular Access

Under Schedule 7A of TPS No.4, a Place of Worship requires on-site parking bays provided in accordance with the following formula:

*1 space for every 2.5 square metres seating area, plus
1 space for every staff member present during peak operation*

The existing building’s proposed seating floor area is approximately 88m². Calculations based on this seating area requires a minimum of 35 on-site parking bays. The applicant indicates that 1 staff member is present during peak operation, which requires 1 space allocated.

The applicant indicates that the existing single dwelling would remain, and has provision for one additional parking bay, which is in accordance with the minimum on-site requirements for a single dwelling of 1 bedroom. A total of 37 car parking bays are required on site.

Following advertising, the applicant has updated the site plan to provide 43 car parking bays on site, exceeding the parking requirements of Schedule 7A.

It would be reasonable to restrict the number of vehicles on site to the maximum number of available parking spaces via a condition of approval and to ensure that all parking is contained on site to address any potential impacts.

Transport Impact Assessment

The applicant has provided a Transport Impact Statement (TIS) prepared by PTG Consulting, dated April 2025. The key conclusions of the TIS are as follows:

- The proposed change of use will attract an additional 42 vehicular trips during its peak operation hours during Sunday noon following the end of service.
- No weekday AM or PM peak trips are expected for the Place of Worship, as it will not operate during the AM periods and PM period trips are significantly lower compared to the weekend peak.
- Wygonda Road is a Local Distributor as per Main Roads WA classifications, which has a maximum desirable volume of 6,000 vehicles per day.
- Brookton Highway is a Primary Distributor as per Main Roads WA classifications. Currently Brookton Highway's average two-way traffic volume is 4,180 per day.
- The added traffic volume generated by the proposed Change of Use would remain within the maximum desirable traffic volume for these road types.

The City's Engineering Services has reviewed the TIS and has not raised any queries in relation to its conclusions.

It is recommended that a condition of approval includes restricting operational hours of the Place of Worship to ensure that traffic is managed in accordance with the TIS. The applicant has argued this is not required and the operational hours provided are strictly service timings, and it is anticipated that some members of the congregation will arrive earlier or leave later. Therefore, the operational hours of a condition can be drafted to accommodate this.

Environmental Acoustic Assessment

The applicant has provided an updated Acoustic Assessment prepared by Herring Storer Associates (June 2025) and a Noise Management Plan (NMP) (August 2025). The key points and conclusions of the Acoustic Assessment and NMP are as follows:

- The primary noise sources considered are singing/non-amplified music within the building and car movements on site.
- The assessment has identified one residential property that could be impacted at 10 Wygonda Road, Roleystone, located to the west of the subject site. In some instances, noise from vehicle movements and car doors may slightly exceed the *Environmental Protection (Noise) Regulations 1997* on occasion.
- Noise levels from the proposal comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* at all times for the remaining adjoining and surrounding properties.

The applicant's Noise Management Plan details management measures including requiring the Place of Worship buildings' doors and windows to remain closed during operations and the use of amplified music is to cease from 9pm. To address potential noise impacts on 10 Wygonda Road, Roleystone, the applicant's Noise Management Plan notes the installation of a minimum 1800mm solid continuous barrier along the boundary adjacent to the carpark and restricting the use of the four westernmost car bays outside of the daytime period.

The City's Health Services have reviewed the Noise Management Plan and accompanying acoustic report and are satisfied with the conclusions and proposed noise management measures.

Bushfire Management Plan

The subject site is within the area mapped as Bushfire Prone Area 2. State Planning Policy 3.7 *Bushfire* and the associated Guidelines apply where the land is designated bushfire prone on the Map of Bush Fire Prone Areas (Map) and the planning proposal will result in the intensification of development (or land use) and results in an increase of visitors, residents and employees.

Generally, SPP 3.7 and the Guidelines may not apply to a development application for a change of use, minor renovations, extensions, alterations, improvements or repair of an existing habitable building:

“where there is no increase in the bushfire risk, such as an extension being further away from the bushfire hazard, or the extension does not restrict vehicular access or the provision of water for the development.”

The Guidelines note in Clause 1.3.1 that where a development application was approved prior to 2015 and therefore was not assessed against SPP 3.7, then:

“the subsequent stage of the planning process, or modification or addition to the development approval should demonstrate compliance with SPP 3.7 (2024) and these Guidelines.”

However, Part 8 of the Guidelines notes that:

“there are no requirements under SPP 3.7 or the Guidelines to retrofit existing buildings to the appropriate bushfire construction standard, or any requirement for these existing buildings to be located within an area with a radiant heat impact not exceeding 29 kW/m² (BAL-29).”

The proposal notes that the existing dwelling and Place of Worship can achieve a BAL rating of 29 or less and compliance with all other bushfire requirements.

Under State Planning Policy 3.7, a "Place of Worship" is classified as a vulnerable land use due to the potential for occupants to have a limited capacity to respond to a bushfire emergency. SPP 3.7 requires the preparation of a bushfire emergency plan for all vulnerable land uses.

The applicant's consultant, Bushfire Logic, has prepared a Bushfire Emergency Evacuation Plan in accordance with the requirements of SPP 3.7. This highlights the evacuation procedures and onsite refuge locations to be used in the event that a bushfire may occur. Two access routes are available from the property, to the east and west via Wygonda Road. It is noted that most patrons would likely travel to the site via a private vehicle which would be available for use in the event of an emergency evacuation.

Site and Soil Evaluation

Final site and soil testing has yet to be carried out at the location. This evaluation can be undertaken as a condition if the application is approved, prior to submitting the finalised on-site effluent disposal design for the City's approval, which is typical requirement for developments of this size and scale.

Arborist Report

The applicant has provided an Arborist Report prepared by Treeswest Australia, dated March 2025. The site supports 17 trees in total: 9 *Corymbia calophylla* (Marri trees), 3 *Eucalyptus*

marginata (Jarrah), 3 *Xanthorrhoea preissii* (grass trees), a *Pinus pinaster* Pine tree and one *Banksia grandis* banksia tree.

The additional car parking has been designed around the existing trees to ensure their retention and the application does not propose the removal of trees.

OPTIONS

Council has the following options:

1. Approve the application for a Place of Worship at Lot 500 (No.8) Wygonda Road, Roleystone, subject to appropriate conditions.
2. Refuse the application for a Place of Worship at Lot 500 (No.8) Wygonda Road, Roleystone and state the reasons for doing so.

CONCLUSION

The proposed Place of Worship retains the use of the existing single house as a residence for members of the congregation or general public, and proposes to adapt the former Squash Courts and Leisure Centre building for a Place of Worship.

A 43 car bay car park is proposed to be provided, with a two-way driveway. The proposal is intended to serve as a premises for religious purposes, making use of existing structures on the land.

The applicant has provided a Transport Impact Statement which demonstrates that the local road network can accommodate the amount of vehicle traffic produced by the proposal. A Noise Management Plan indicates that the use is capable of complying with the *Environmental Protection (Noise) Regulations 1997* subject to appropriate construction and management conditions. A Bushfire Emergency Evacuation Plan has been provided which indicates that there are available evacuation routes.

The proposal is recommended for conditional approval, in accordance with Option 1.

ATTACHMENTS

1.  Aerial Map
2.  TPS Zoning
3.  Schedule of Submissions
4. Confidential List of Names and Addresses of Submitters - *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*
5. Confidential Local Area 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*
6.  Updated Car Parking Plan
7.  Noise Management Plan
8.  Arborist Report
9.  Acoustic Report

COMMITTEE RECOMMENDATION

D2/11/25

That Council:

1. Approves the application for Development Approval for Place of Worship on Lot 500 (No.8) Wygonda Road, Roleystone, subject to the following conditions:

- a) Operating hours of the Place of Worship shall be limited to:**
 - a. 9:30am – 10pm on Sunday;**
 - b. 5pm – 10pm on Wednesday and Friday; and**
 - c. 2pm – 8pm Saturday.**
- b) A maximum of 120 persons are allowed in the Place of Worship.**
- c) Car parking demand shall be accommodated within the site at all times in the constructed parking bays. The car parking demand shall not exceed the number of parking bays approved for the development, being 43 vehicle bays, at any one time.**
- e) To meet drainage requirements the developer/owner shall, to the specification and satisfaction of the Executive Director Technical Services:**
 - a. Submit a stormwater plan incorporating water sensitive design principles for approval and implement the approved plan thereafter;**
 - b. Show any drainage easements as may be required on the Certificate of Title in favour of the City; and**
 - c. Relocate, remove or upgrade any drainage infrastructure on the lot or within the adjoining road reserve that is impacted by the proposed development.**
- f) A landscape plan shall be submitted to and approved by the Executive Director Development Services. The landscape plan shall include:**
 - a. Plant species (predominantly West Australian species);**
 - b. Numbers, location, container size;**
 - c. Method of irrigation of the landscaped areas;**
 - d. Retention of existing trees as identified on the approved site plan; and**
 - e. Existing trees on site are to be managed in accordance with AS 4970 – 2009 *Protection of Trees on Development Sites*.**

All landscaping shall be installed prior to occupancy of the development and maintained as per the approved plan thereafter.

- g) All vehicle parking manoeuvring spaces shall be constructed, sealed, kerbed, marked and drained in accordance with the approved site plan to the satisfaction of the Executive Director Technical Services and continuously maintained thereafter. Relocation/removal of any services/infrastructure will be at the cost of the developer.**

- h) The Bushfire Emergency Evacuation Plan prepared by Bushfire Logic and dated 10 January 2025, shall be implemented to ensure the fine fuel load within the lot is maintained to the requirements of Appendix B, Table 9 of the *Planning for Bushfire Guidelines* (as amended).**
- i) Noise mitigation measures recommended within the Acoustic Report submitted by Herring Storer Acoustics (updated 27 October 2025), shall be incorporated at the Building Permit Application stage, and continuously implemented to the satisfaction of the Executive Director Development Services. All activities shall be conducted in a manner to avoid any unreasonable noise impact upon adjoining neighbours, in compliance with the Noise Management Plan dated 29 October 2025 and the *Environmental Protection (Noise) Regulations 1997*.**
- j) No materials or bins shall be stored in car parking areas.**
- k) A schedule of external colours and materials shall be submitted to the City's Planning Services Department and approved by the Executive Director Development Services. The development shall be completed and maintained in accordance with the approved schedule to the satisfaction of the Executive Director Development Services. External colours and materials shall be in keeping with the surrounding character and amenity of the locality and maintained to the satisfaction of the Executive Director Development Services.**
- l) Prior to the commencement of any works associated with the onsite wastewater management system, a Site and Soil Evaluation (SSE) must be undertaken by a suitably qualified professional in accordance with AS/NZS 1547:2012. The SSE must be submitted to the satisfaction of the City and demonstrate that the proposed system is appropriate for the site conditions. Should the SSE identify that the proposed system is unsuitable, an alternative wastewater management system must be designed and submitted for approval, ensuring compliance with relevant legislation.**
- m) Prior to the commencement of works or any development being undertaken on the site the applicant shall submit and have approved, the specification of the proposed on-site effluent disposal system to the satisfaction of the City of Armadale. The specifications shall include, unless otherwise agreed in writing:**

 - a. Location and clearance from highest known groundwater;**
 - b. Expected performance;**
 - c. Nutrients removal capability; and**
 - d. Monitoring and maintenance plan.**
- n) All conditions are to be complied with prior to exercising the right of this approval, to the satisfaction of the Executive Director Development Services.**
- o) With respect to any development on site, particularly the construction of car parking, the noise wall and installation of the effluent disposal system, a**

qualified arborist is to conduct a pre-site inspection to ensure that all necessary protections and proposed work practices are in place prior to any ground disturbing activity to ensure there is no damage to existing trees or their roots onsite.

ADVICE NOTES

- a) A separate application is required for all signs associated with the development.
- b) With regard to the Condition requiring submission of a colour and material schedule, it is expected that the colour and material schedule will be submitted and approved prior to the submission of a Building Permit Application.
- c) With regard to the Condition requiring a Landscape Plan, please refer to the City's Landscaping Guidelines – (Screening) and the Landscaping Guidelines – Plants to Avoid, to assist you to formulate a satisfactory landscaping proposal. Copies of these documents are available on the City's website at: www.armadale.wa.gov.au/publications/
- d) Existing trees are to be managed in accordance with AS 4970 – 2009 *Protection of Trees on Development Sites*.
- e) With regard to the Condition regarding vehicle manoeuvring spaces, the City's Technical Services Directorate should be contacted in order that the appropriate crossover application may be made.
- f) Lighting shall comply with Australian Standard 4282-1997 "*Control of the obtrusive effects of outdoor lighting*" or its equivalent and the City's *Environment, Animals and Nuisance Local Laws 2002*.
- g) It is recommended that security cameras and CCTV be installed in internal and external areas of the premises, including car parking areas to manage and deter criminal and anti-social behaviour.
- h) At all times the noise levels must comply with the requirements of the *Environmental Protection (Noise) Regulations 1997*.
- i) Compliance with the *Health (Public Buildings) Regulations 1992* is required. In this regard, a Public Building application shall be submitted to the City's Health Department and approved prior to occupation of the proposed building.
- j) With regard to the Bushfire Emergency Evacuation Plan, the City notes that the establishment of an APZ does not require wholesale clearing.

Additionally, it is highly recommended that ember protection screens be installed to any evaporative air conditioning unit. Further information can be obtained at:

<http://www.dfes.wa.gov.au/safetyinformation/fire/bushfire/BushfireInfoNote>

[sPublications/DFES-InfoNote-BushfireEmberProtectionScreens.pdf](#)

- k) The proposal may involve a change of classification or use therefore the building will need a new Occupancy Permit in accordance with the *Building Act 2011* Section 49. A change of classification requires compliance with the current Building Code of Australia in accordance with the *Building Regulations 2012* Section 31G. This may include but is not limited to energy efficiency, disabled access and fire safety. Any alteration works will require a Building Permit.
- l) With regards to Condition 14 or Condition (n), the owner and/or applicant is encouraged to provide written evidence to the City to demonstrate compliance of the conditions noted above. For further information please refer to Planning Information Sheet “Development Application Condition Clearance” available at <https://www.armadale.wa.gov.au/information-sheets-forms-and-fees-building-planning>
- m) The applicant and landowner are advised that it is a statutory requirement to comply with all conditions of this approval, and that not complying with any condition is therefore illegal. Failure to comply with any condition of this approval or the approved plans constitutes an offence under the *Planning and Development Act 2005*. The City can issue a Planning Infringement Notice of \$500 (without notice) and/or commence legal action with higher penalties up to \$200,000 for each offence and a daily penalty of \$25,000 per day for the continuation of that offence. It is the responsibility of the applicant and/or landowner to inform Council in writing when they consider the development to be complete and all conditions of this approval have been satisfied.
- n) The developer is reminded of the requirement under the provisions of the *Environmental Protection Act 1986* that all construction work (which includes earthworks and similar) be managed with due regard for noise control. Works generating noise, and rock breaking in particular, are not permitted:-
 - i. Outside the hours of 7:00am to 7:00pm; or
 - ii. On a Sunday or Public Holiday.
- o) If the applicant is aggrieved by a Refusal to Approve his/her application, or, where Approved, is aggrieved by any Condition imposed in that Approval he/she may apply for a Review to the State Administrative Tribunal pursuant to the provisions of Part 14 of the *Planning and Development Act 2005* against such refusal or imposition of such aggrieved Condition. Such application for Review must be made not more than twenty eight (28) days after the date of Council’s decision via the form available from the State Administrative Tribunal (copies available from the State Administrative Tribunal, at Level 4, 12 St Georges Terrace, Perth, or GPO Box U1991, Perth, WA, 6845, or www.sat.justice.wa.gov.au or from Council’s offices), and should be accompanied by the relevant fee detailed in Schedule 18 of the *State Administrative Tribunal Regulations 2004*.
- p) If the development the subject of this approval is not substantially

commenced within a period of 24 months from the date of this letter, the approval shall lapse and be of no further effect. Where an approval has lapsed, no development shall be carried out without the further approval of the responsible authority having first been sought and obtained.

- 2. That the submitters be advised of Council's decision in this regard.**

**Moved Dr C M Wielinga
MOTION CARRIED**

6/0

1.3 - DEVELOPMENT APPLICATION - PINDARI RESTORATION HOUSE - LOT 41 - 61 NELSON STREET BEDFORDALE

WARD : HILLS

FILE No. : M/499/25

APPLN NO. : 10.2025.175.1

DATE : 11 November 2025

REF : JF

RESPONSIBLE MANAGER : Co-ordinator Statutory Planning

APPLICANT : Mark Bruning, Pindari Ministries Inc.

LANDOWNER : Pindari Ministries Inc.

SUBJECT LAND : Property size 2.03 ha

ZONING

MRS / : Rural

TPS No.4 : Special Rural 2

In Brief:

- The City received an application on 25 July 2025 to amend the Development Approval 10.2018.166.1 by increasing the maximum number of clients permitted and to construct additional accommodation on the site.
- The application was advertised for a period of four weeks. A total of four (4) submissions were received, two (2) objecting to the proposal.
- Recommend that Council approve the application subject to amended Conditions of approval.

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 enhances the amenity and liveability of the City.

Legal Implications

Planning and Development Act 2005
Town Planning Scheme (TPS) No. 4
Local Planning Strategy 2003
Metropolitan Region Scheme

Council Policy/Local Law Implications

PLN 2.4 Tree Preservation
PLN 2.9 Landscaping

Council Policy/Local Law Implications

Health Local Laws 2002

Budget/Financial Implications

Nil.

Consultation

1. Advertised for Public Comment.
2. City of Armadale Internal Business Units (DCU)
3. Department of Planning, Lands and Heritage (DPLH)
4. Department of Fire and Emergency Services (DFES)

BACKGROUND

The subject property at Lot 41 (61) Nelson Street, Bedforddale) has two existing residences, several outbuildings and water tanks. The current manager's residence is located centrally and towards the front of the property and the second accommodation dwelling which was approved in January 1999 is to the rear of the main house. The second residence is the building currently being used for Community Purpose with a maximum of six participants or clients at any one time. The property is heavily vegetated and abuts the Bungendore Park Reserve.

Council conditionally approved a development application for Change of Use to Community Purpose (Pindari Restoration House) for the second residence on 12 October 2015 for a period of three years (and a maximum of four participants) to enable the applicant to demonstrate their ability to operate the facility without creating significant negative impacts on surrounding residents. Council subsequently approved an application for permanent operation of the Community Purpose with an increased maximum of six participants on 25 September 2018. Conditions of approval included the ongoing implementation of the comprehensive management plan (approved by Council on 27 September 2016) and biannual audit reports on compliance with the management plan (which have been received since commencement of the use).

The applicant now seeks approval for an increase to the permitted maximum number of participants from six (6) to fifteen (15) men and utilising the existing manager's residence as Community Purpose accommodation. An additional accommodation unit is proposed for the onsite caretaker.

The applicant submits that the successful operation history of Pindari Restoration House to date justifies the proposal for increased capacity. The applicant has also advised that “*Pindari has recently passed its audit and achieved accreditation under the Alcohol and Other Drugs Human Services Standard (AODHSS). This is a significant milestone in our growth, reflecting our commitment to service quality and client outcomes, enhancing credibility and trust, and demonstrating a strong culture of governance and continuous improvement.*”

“Pindari House is now seeking planning approval to increase its onsite residential capacity from six to fifteen residents and add an accommodation unit and meeting rooms to the facilities. The accommodation unit will be housing for an afterhours caretaker and the added meeting rooms will allow flexibility with class sizes and the number of residents that can be in counselling session at a time. The two existing houses on the property will be the accommodation for the fifteen residents and house leaders and no additional buildings are required for that purpose”.

DETAILS OF PROPOSAL

The applicant seeks approval for:

- an additional nine (9) participants (increasing the maximum number of participants from six (6) to fifteen (15) men;
- an updated Pindari Management Plan to align with the proposed increased capacity;
- utilising the existing manager’s residence as an accommodation building for the additional participants (including a bushfire asset protection zone);
- construction of a new accommodation unit for an onsite caretaker (including a bushfire asset protection zone);
- extension to the existing hall building; and
- additional meeting rooms.

The following documents are attached in support of the current application:

1. Revised Pindari Management Plan – July 2025.
2. Revised Bushfire Management Plan by Envision Bushfire Consultants – July 2025
3. Assessment of the onsite sewage treatment systems by TJ Peach and Associates – 6 March 2025
4. Site Plan and Floor Plans SK1, SK2, SK3 Rev C by Tristan Schiebaan Drafting and Design.

COMMENT

Development Control Unit (DCU)

The proposal has been referred to the City’s Development Control Unit (DCU) for comment.

The City’s Health Services has reviewed the onsite effluent disposal assessment (prepared by TJ Peach & Associates, dated 6 March 2025) and noted that the size of the system may require some tree clearing. The applicant has since provided a site plan showing the location of the new leach drains in an existing lawn area avoiding any tree removal.

Agency Referral

The proposal was referred to the Department of Planning, Lands and Heritage (DPLH) in accordance with Western Australian Planning Commission Delegation Instrument Del 2025/04 Powers of Local Governments Metropolitan Region Scheme. The City is required to refer a non-conforming use application to DPLH for comment prior to determination of the application under the Metropolitan Region Scheme (MRS). DPLH advised it had no comment to make therefore the City has delegation to determine the proposal under the MRS.

Public Advertising

The application was advertised for four weeks in accordance with clause 64 of the *Deemed Provisions* (Schedule 2, *Planning and Development (Local Planning Schemes) Regulations 2015*). The public submission period concluded on 15 September 2025. Advertising was carried out by way of letters to affected and nearby landowners.

Total No. of letters sent to residents/owners	: 18
Total No. of submissions received	: 4
No. of submissions of conditional support/no objection	: 1
No. of submissions of objection	: 2
No. of submissions of general advice by Service Agencies	: 1

The main issues raised in submissions, together with a comment on each issue are outlined below.

Key Issues

Issue 1. Additional Traffic

Proposal will bring additional traffic to a quiet street. There are currently at least 8 cars a day that come and go from the property. There have been multiple near misses and one accident from the traffic coming and going from the property to date in the last three years.

Comment

The applicant has advised that staff numbers remain modest and staggered, ensuring traffic generation is low and manageable. Additionally, car parking is provided on the site to prevent parking on the roadside. The applicant has also noted that the incident referred to above occurred due to driver error and is not related to the volume of traffic originating from the facility or the volume of traffic on Nelson Street. No other incidents, including near misses, have been recorded and staff at the facility have not been made aware of any.

Given that residents are not permitted to have their own vehicles, increased traffic to and from the site can be attributed to staff and visitors. The City's Technical Services has raised no objections to the current crossover arrangements. It is considered that the current road network has sufficient capacity to accommodate the additional vehicles visiting the site. This is discussed further later in this report.

Recommendation

That the issue is not supported.

Issue 2. Amenity/safety

Most residents in Nelson St were against this when approval was granted by the Council. It has not been a problem with six residents but we do object again to increased numbers to fifteen and further buildings. A lot of young families have moved into Nelson Street with small children and there could be some risk.

Comment

The quiet and responsible operation of the development since its approval has been demonstrated. The City also notes that there have been no formal complaints received by the City in relation to the current development and the regular audit reports from the applicants indicate there have been no breaches of the approved Management Plan.

Recommendation

That the issue is not supported.

Issue 3. Intensification of development

We as residents are not allowed more expansion on our blocks.

Comment

Council first considered the ‘Community Purpose’ use in 2015. At the time, the subject Lot 41 Nelson Street was zoned ‘Rural Living 2’ under TPS No.4. The proposed use ‘Community Purpose’ was classified as an ‘A’ use in the zone, meaning the use could be considered following public advertising in accordance with the Scheme (TPS No.4). Following assessment of the proposal it was determined that the use was consistent and compatible with the objectives of the ‘Rural Living’ zone. The applicant is now seeking to expand the approved use and has provided revised documentation in support of the current proposal. The current proposal will be assessed for compatibility with the objectives of the current zoning (Special Rural).

Recommendation

That the issue is not supported.

ANALYSIS

Town Planning Scheme No.4 (TPS No4)

Land Use Definition

The City’s TPS No.4 defines a ‘Community Purpose’ use as “*the use of premises designed or adapted primarily for the provision of educational, social or recreational facilities or services by organisations involved in activities for community benefit*”. The proposal is considered to be consistent with this definition.

Zoning and Land Use Permissibility

The subject land is now zoned ‘Special Rural’ under TPS No.4 (by virtue of Scheme Amendment No.97, gazetted on 6 March 2020). The approved use ‘Community Purpose’ is classified as an ‘X’ use in the Special Rural zone, which means that the use is not permitted in the zone. The approved use is now subject to the ‘non-conforming use’ provisions of TPS No.4.

Non-conforming Uses

3.8 Non-conforming uses

Except as otherwise provided in the Scheme, no provision of the Scheme is to be taken to prevent —

- (a) the continued use of any land for the purpose for which it was being lawfully used immediately prior to the Gazettal date;*
- (b) the carrying out of any development on that land for which, immediately prior to the Gazettal date, an approval or approvals, lawfully required to authorize the development to be carried out, were duly obtained and are current; or*
- (c) subject to clause 80 of the Deemed Provisions, the continued display of advertisements which were lawfully erected, placed or displayed prior to the Gazettal date.*

3.9 Extensions and changes to a non-conforming use

3.9.1 A person must not —

- (a) *alter or extend a non-conforming use;*
 - (b) *erect, alter or extend a building used in conjunction with or in furtherance of a non-conforming use; or*
 - (c) *change the use of land from a non-conforming use to another non-conforming use, without first having applied for and obtained development approval under the Scheme.*
- 3.9.2 *An application for development approval under this clause is to be advertised in accordance with clause 64 of the Deemed Provisions.*
- 3.9.3 *Where an application is for a change of use from an existing non-conforming use to another non-conforming use, the local government is not to grant its development approval unless the proposed use is less detrimental to the amenity of the locality than the existing non-conforming use and is, in the opinion of the local government, closer to the intended purpose of the zone.*

Clause 3.8 of TPS No.4 states that no provision of the Scheme is to be taken to prevent the continued use of any land for the purpose for which it was being lawfully used immediately prior to the Gazettal date.

Development approval is required for any alterations or extensions to a non-conforming use in accordance with clause 3.9 of TPS No.4 and such applications must be advertised in accordance with clause 64 of the Deemed Provisions (Schedule 2, *Planning and Development (Local Planning Schemes) Regulations 2015*) prior to determination. It is important to note that sub-clause 3.9.3 is not applicable in this instance, as the existing non-conforming use is not changing to another use. The existing non-conforming use remains the same, and all proposed associated activities are incidental to existing use of the land. The application as proposed is capable of being considered for approval in this regard.

Special Rural Zone Objectives

Objectives of the Special Rural zone include the following:

- (a) *To provide for a bushland and/or semi-rural lifestyle based on defined lot sizes, landform and natural environmental characteristics with potential to undertake development incidental to the residence as well as a range of small scale agricultural land uses compatible with the site and locality's amenity and natural values.*
- (b) *To ensure development is sited, designed and managed in harmony with the natural environment and so as to protect the vegetation, rural landscape and amenity of the site and locality.*

It is considered that the ongoing retention of native vegetation on the site is desirable to assist with screening the development from public view and protect the existing rural amenity of the area.

Effluent Disposal

The site is not serviced by a reticulated sewerage line and utilises an on-site effluent disposal system. The applicant has submitted a review of the existing effluent disposal arrangements on the site which recommends that the existing system be decommissioned and replaced with a larger ATU system with dripper irrigation or leach drain disposal. The applicant has since advised that a leach drain disposal system will be utilised which will be installed in an existing lawn area to avoid any tree clearing. These are standard considerations should a development approval be granted.

Setbacks

The proposed accommodation unit includes a minor side setback variation. A side setback of 11.8m is proposed however a 15m setback is required. Approximately 10.5m² of the building will encroach into the side setback area. The building is unlikely to be highly visible from the street with a front setback distance of approximately 55m and existing native vegetation between the building and street. Some screening vegetation may be desirable on the corner within the setback area to protect the visual amenity of the neighbouring property however this will need to be carefully considered in the context of the Bushfire Management Plan. It is considered that the variation can be supported due to the limited impact on surrounding amenity.

The relocated Office building has a front setback of approximately 80m and a side setback of approximately 37m, which are appropriate.

Building Height

The proposed new accommodation unit will be 3.54m high and does not exceed the maximum building height permitted in the zone.

Building coverage

Clause 4B.3.1 of the Scheme permits a maximum 500m² of building coverage (including outbuildings) unless otherwise approved by the local government.

The site currently contains the following approved structures:

- Primary dwelling (150m²) currently a manager's residence to be converted to Community Purpose accommodation for nine (9) men.
- Second Dwelling (160m²) already used as Community Purpose accommodation for six (6) men.
- Outbuilding 1 (Workshop and Carport) adjacent to primary dwelling, now being used for a hall and has been enclosed to provide a floor area of 65m².
- Outbuilding 2 (Garage and Carport) near southern side boundary (36m²).
- Outbuilding 3 (Shed) in southwestern corner of the property has been enclosed at the rear to provide a floor area of 198m².

There are various assorted smaller sheds on the site however outbuildings that are less than 10m² in area and unenclosed structures generally do not require development approval.

Proposed structures include:

- Overnight caretakers residence (60m²) to be located at the eastern end of the playing court.
- Office (24m²) existing structure to be relocated to the southwestern corner of the playing court.

The total area of buildings on the site will be approximately 693m². This represents 3.4% of the whole site and exceeds permitted building coverage of 500m² by 193m². It is noted that only 60m² of this area will be occupied by new buildings therefore the visual impact is likely to be negligible. It is considered that the variation can be supported due to the limited impact on surrounding amenity.

Car parking and vehicular access

Ten (10) marked car parking spaces are provided on a bitumen hardstand adjacent to the primary dwelling (proposed for Community Purpose accommodation). The City's TPS No.4 requires one (1) parking space for every five (5) persons the facility is designed to accommodate i.e. a minimum of three (3) spaces is required. The applicant's management plan states that aside from the 3-4 leaders / caretakers living on site, a maximum of five (5) staff / volunteer vehicles will be on site during weekdays and a maximum of six (6) visitor vehicles will be on site on Saturdays. Occasional special gatherings and 'busy bee' days will have a maximum of ten (10) extra vehicles on site. It is noted that apart from the ten (10) formally marked spaces, there are several informal parking spaces adjacent to the dwellings. It is considered that sufficient car parking is provided and that compliance with the management plan will ensure that visitor parking is managed appropriately. The proposed increase in the number of staff / volunteer vehicles on site on weekdays is calculated to be three (3).

Water supply (domestic)

The property already contains five large rainwater tanks for domestic and firefighting purposes. The applicant has advised that the new accommodation unit will be serviced by the existing tanks on site.

Remnant vegetation protection

The proposed site for the relocated Office structure does not contain any existing trees and abuts an existing lawn area. The proposed site for the new overnight caretaker's unit is adjacent to the tennis court. The applicant has advised that tree clearing is not required to accommodate the accommodation unit. A Bushfire Asset Protection Zone (APZ) with a 21m-27m radius will be required around this building. The applicant has confirmed that trees do not need to be cleared to achieve the APZ maintenance standard contained in the Planning for Bushfire Guidelines (Nov 2024).

State Planning Policy 3.7 Bushfire (SPP3.7)

The site is located in a designated Bushfire Prone Area and is therefore subject to the requirements of SPP3.7. The policy and associated Planning for Bushfire Guidelines were reviewed and revised by the State Government in November 2024. The existing proposal was assessed as 'Minor Development' under SPP3.7 at the time, however the revised SPP3.7 no longer incorporates this class of development. Part 6 of the *Planning for Bushfire Guidelines* (Nov 2024) now applies to this type of development in a residential setting. The preparation of a Bushfire Emergency Evacuation Plan is not mandatory for this type of development however it is recommended and Department of Fire and Emergency Services has advised that the adoption of an EEP is supported.

Bushfire Management Plan (BMP) and Emergency Evacuation Plan (EEP)

A revised Bushfire Management Plan and Bushfire Emergency Plan (prepared by Envision, dated 5 July 2025) was referred to Department of Fire and Emergency Services (DFES) for comment because the BMP may involve a vulnerable land use on a site with a Bushfire Attack Level (BAL) rating of BAL-FZ and contains a bushfire protection criterion which has been addressed through an outcomes-based approach. These are triggers for referral to DFES for comment. The City has received a written response from DFES advising that Part 6 of the Guidelines should be applied rather than the tourism / public building criterion used in the amended BMP. Notwithstanding the applicable criteria, the revised BMP predicts the new accommodation unit and the existing Manager's residence are capable of achieving BAL-29 through the provision of Asset Protection Zones (APZ) ranging in size from 11m to 27m

radius around the buildings. As noted earlier, the applicant has confirmed that trees do not need to be cleared to achieve the APZ maintenance standard contained in the Planning for Bushfire Guidelines (November 2024).

Pindari Restoration House Management Plan

The Pindari Management Plan has been revised to account for the proposed increase in the maximum number of participants. Weekday staff / volunteer numbers is proposed to increase by three (3) persons per day and Saturday visitor numbers are proposed to remain the same. The applicant has confirmed that Saturday visitor vehicle numbers have been limited to six (6) as residents are only permitted visitors during certain stages of the program. *“In the event that visitor numbers do increase beyond this limit, such as for family nights or special events, we will relocate these gatherings to an off-site venue to ensure adequate parking and accessibility as well as adequate seating and kitchen facilities. Suitable venues are available to Pindari including Free Reformed Church of Darling Downs Church and Free Reformed Church of Southern River. Otherwise we will make use of a local community centre or hall within the City of Armadale”.*

The existing Pindari Management Plan has performed satisfactorily as the City has not received any substantiated complaints relating to the operation of the Community Purpose use. Reporting requirements have been met by the operators with a compliance report submitted to the City every six months. Given the well managed operation of the facility since its approval in 2015 and demonstrated ability of the operators to comply with the Pindari Management Plan, it is considered that the reporting requirement could be reduced to require annual reporting.

OPTIONS

Council has the following options:

1. Approve the application to amend the conditions of Planning Approval (DA10.2018.166.1, dated 25 September 2018) for increased number of participants, annual compliance reporting and additional buildings on Lot 41 (61) Nelson Street, Bedforddale; or
2. Refuse the application and provide reasons for its decision.

CONCLUSION

The application to increase the maximum number of participants at Lot 41 (61) Nelson Street, Bedforddale (Pindari Restoration House) has been assessed for compliance with the City's Town Planning Scheme No.4 and relevant local and state planning policies. The approved use (Community Purpose) is now a non-conforming use in the Special Rural zone (by virtue of Scheme Amendment No.97, gazetted on 6 March 2020).

The application has been advertised in accordance with the *Planning and Development (Local Planning Schemes) Regulations 2015* to surrounding landholders and the Department of Planning, Lands and Heritage. A total of four (4) submissions were received including two (2) objections. It is considered that the issues raised in submissions have been addressed satisfactorily by the applicant and can be adequately managed via continued implementation of the Pindari Management Plan. The Pindari Management Plan (approved in 2018) has been implemented successfully to date by the applicants, who have complied with the City's compliance reporting requirements to the extent that annual reporting is now recommended.

The application proposes a variation to the maximum site cover provisions of TPS No.4. The visual impact of the proposed variation can be supported as the proposed new structures are unlikely to be visible from the street and will have limited impact on surrounding amenity.

The provision of bushfire asset protection areas (APZ) (for the two accommodation dwellings at the front) will require continued management for fuel reduction. The applicant has confirmed that trees do not need to be cleared to achieve the APZ maintenance standard contained in the Planning for Bushfire Guidelines (November 2024).

ATTACHMENTS

1. 1 Location Plan
2. 2 Aerial Plan
3. 3 Development Plans (July 2025)
4. 4 Pindari House Supporting Document Links
5. Local Area 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*
6. 6 Schedule of Submissions
7. Confidential List of Names and Addresses of Submitters - *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*

RECOMMEND

D3/11/25

That Council:

- 1) Approves the application to amend the conditions of Planning Approval (DA10.2018.166.1, dated 25 September 2018) for increased number of participants and additional buildings on Lot 41 (61) Nelson Street, Bedfordale, subject to the following:**
 - a) Condition 1 is amended as follows: “The site shall be operated in strict accordance with the approved Pindari Restoration House Management Plan (July 2025, attached) to the satisfaction of the Executive Director Development Services. Any proposed alteration to management practices described in the management plan shall be subject to prior approval by the Executive Director Development Services”.**
 - b) Condition 2 is amended as follows: “A status and compliance report addressing the Management Plan shall be submitted to the City every 12 months”.**
 - c) Condition 3 is amended as follows: “The maximum number of clients accommodated at any one time shall not exceed fifteen (15) persons”.**
 - d) Condition 4 is amended as follows: “The Bushfire Management Plan prepared by Envision Bushfire Protection (July 2025, attached), shall be implemented (including all recommendations and conditions contained in the BMP) prior to occupation of the new buildings”.**
- 2) That the submitters be advised of the Council’s decision in this regard.**

**Moved Cr R Butterfield
MOTION CARRIED**

6/0

***2.1 - FINAL ADOPTION - AMENDMENT NO.128 - TOWN PLANNING SCHEME NO.4
- SHORT TERM RENTAL ACCOMMODATION***

WARD : ALL

FILE No. : M/638/25

DATE : 11 November 2025

REF : SN

RESPONSIBLE : Executive Director
MANAGER Development Services

In Brief:

- Council at its meeting of 26 May 2025 resolved to initiate 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 (TPS 4), in response to amendments to the *Planning and Development (Local Planning Schemes) Regulations 2015* (LPS Regulations).
- The amendment was advertised for 42 days in accordance with the *LPS Regulations*. No submissions were received.
- The proposed amendment should be supported as it is consistent with changes made by the State Government to the deemed provisions of the LPS Regulations.
- Recommend that Council adopt the amendment without modification and request that the Hon Minister for Planning grant final approval to the amendment.

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

Town Planning Regulations 1967

Metropolitan Region Scheme

Town Planning Scheme No.4 (TPS 4)

Council Policy/Local Law Implications

Local Planning Strategy

Budget/Financial Implications

Nil.

Consultation

The amendment was advertised for a period of 42 days in accordance with Clause 47 of the *LPS Regulations*. The amendment was advertised in the local newspapers and on the City's website commencing 12 September 2025 and closing on 24 October 2025. No submissions were received.

BACKGROUND

At its May 2025 meeting, Council resolved to initiate Amendment No.128 to TPS 4 to incorporate the State Government's new deemed land uses for Short Term Rental Accommodation (STRA) in both hosted and unhosted forms.

This amendment was required following gazettal of the *Planning and Development (Local Planning Schemes) Amendment Regulations 2025*, which introduced two new land use classes for STRA into all local planning schemes across Western Australia.

Historically the City has viewed STRA uses as private tenant arrangements. Like all such arrangements, no development approval was needed. This is reflected in the discussion item on Airbnb referred to Council for consideration at its meeting of December 2017. It should be noted that there is a proportionally low number of registered STRAs in the City, likely no more than fifty according to the State's Register of STRA providers.

DETAILS OF PROPOSAL

With the introduction of the new STRA deemed land use classes into local planning schemes, this scheme amendment relates to the introduction, modification and deletion of various land use and general definitions within the City's TPS 4. New exemptions and definitions are 'deemed' through the *LPS Regulations* and as such are already operative across Western Australia, however this amendment is still necessary to ensure that the TPS 4 zoning table reflects the hosted STRA exemption as a permitted use as per Western Australian Planning

Commission (WAPC) requirements and to ensure appropriate permissibility is assigned to unhosted STRA.

This report proposes the final adoption of Amendment No.128 to introduce the two new land use classes of 'STRA – Hosted' and 'STRA – Unhosted' into TPS 4, consistent with the deemed provisions of the LPS Regulations.

The land uses are proposed with the following permissibility:

Use Class	Zones where dwellings are permitted	Permissibility
Short Term Rental Accommodation – Hosted	All zones where any type of 'dwelling' is capable of approval	P (Permitted)
Short Term Rental Accommodation – Unhosted	All zones where any type of 'dwelling' is capable of approval	D (Discretionary)

The existing 'Bed and Breakfast' land use is deleted from TPS 4 as its function is now covered by 'STRA – Hosted'.

Ministerial Modifications

Following referral to the Department of Planning, Lands and Heritage (DPLH) of Council's decision to initiate Amendment No.128, the Minister for Planning requested minor modifications to the amendment. The modifications were limited to reordering the definitions and zoning table insertions to reflect the preferred model sequence under the LPS Regulations. The modifications also ensured that TPS 4 STRA land use definitions deferred to the deemed provisions in the LPS Regulations rather than being inserted into the TPS 4 text itself. The City had followed the DPLH's information on the drafting of Amendment No.128, which has since changed.

The minor modifications required by the Minister are to ensure consistent terminology between TPS 4, the deemed provisions and the State planning framework. The changes are administrative in nature and do not alter the intent, substance, or operation of Amendment No.128 as initiated.

The amendment is considered to be a standard amendment under the provisions of Regulation 34 of the *Planning and Development (Local Planning Schemes) Regulations 2015*, as the amendment introduces new land use classes to TPS 4.

The amendment was publicly advertised for a minimum period of 42 days in accordance with Clause 47 of Division 3 of the LPS Regulations, consistent with the *Planning and Development Act 2005*, with no submissions received.

ANALYSIS

The amendment ensures TPS No.4 is consistent with the State Government's planning reforms and provides clarity to landowners and applicants on the permissibility of STRA uses within the City.

The City will contact STRA providers in due course to advise that applications for development approval for unhosted STRA can now be lodged for assessment and determination.

OPTIONS

1. Council may adopt the amendment with or without modifications and request that the Minister for Planning grant final approval to the amendment.
2. Council may resolve to not adopt the amendment giving reasons and request that the Minister for Planning refuse to approve the amendment.

CONCLUSION

The amendment incorporates the new State defined land uses for *STRA – Hosted* and *STRA – Unhosted* into TPS No.4, deletes the *Bed and Breakfast* use, and ensures consistency with the *Planning and Development (Local Planning Schemes) Regulations 2015*. No submissions were received. It is therefore recommended that Council adopt Amendment No.128 without modification and forward it to the Western Australian Planning Commission for its recommendation to the Minister for final approval in accordance with Option 1 above.

ATTACHMENTS

There are no attachments for this report.

D4/11/25

RECOMMEND

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	D	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.
2. Authorise the Mayor and Chief Executive Officer to execute the relevant documents and forward the amendment to the Western Australian Planning Commission for final approval.
3. Should the Minister require any minor modifications to Amendment No.128 at the final approval stage, authorise the Mayor and Chief Executive Officer to execute the modified documents for Amendment No.128.

Moved Cr J Keogh
MOTION CARRIED

6/0

2.2 - PROPOSED AMENDMENT NO.129 TO TPS NO.4 - PROPOSED MODIFICATION TO EXPIRATION PERIOD - NORTH FORRESTDALe CONTRIBUTION PLAN NO.3

WARD : LAKE
RANFORD
FILE No. : M/650/25
DATE : 11 November 2025
REF : NB/RS
RESPONSIBLE : Executive Director
MANAGER Development Services

In Brief:

- Scheme Amendment No.12, which introduced Development Contribution Plan No.3 (DCP 3) for the North Forrestdale area into TPS No.4 was gazetted on 23 January 2007.
- Schedule 9B clause 3.14 of TPS No.4 which governs the operating lifespan of DCP 3, provides that the DCP will expire in 20 years of the date of first gazettal i.e. 23 January 2027.
- Due to a number of factors relating to the amount of land remaining to be subdivided in the area and the extent of remaining DCP common infrastructure yet to be delivered, the City has determined that the operating lifespan of DCP 3 should be extended by 10 years.
- Recommend that Council initiate Amendment No.129.

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, but it is noted that the Development Contribution Plan No.3 (DCP 3) provides funding to the City for staff costs associated with administering DCP 3. These costs are included in the Infrastructure Cost Schedule (ICS) and reconciled on an annual basis

Strategic Implications

- 1.3.1 Plan for services and facilities in existing and emerging communities.

- 2.2.1 Deliver attractive and functional streetscapes, open spaces, City buildings and facilities.
- 2.5.1 Implement and administer the City's Town Planning Scheme and Local Planning Strategy to deliver quality development outcomes.
- 2.5.1.2 Implement the Developer Contribution Plan arrangements and review as required.

Legal Implications

Planning and Development Act 2005

Planning and Development (Local Planning Schemes) Regulations 2015

State Planning Policy 3.6 – Infrastructure Contributions

Town Planning Scheme No.4

Council Policy/Local Law Implications

Nil

Budget/Financial Implications

Through DCP No.3, the City collects Development Contributions which provide a source of funding for the provision of essential facilities and infrastructure that produces considerable benefits for the communities that reside within Harrisdale and Piara Waters.

DCP 3 includes the cost of providing community and sporting facilities in the precinct. Although the DCP provides funding for the provision of the facilities/infrastructure, the City is required to fund the future recurrent operational and maintenance costs for the facilities and infrastructure that is delivered. The City also manages the financial impact of depreciation of these new assets. However, these assets are needed to deliver essential facilities and infrastructure to service the needs of the area.

Consultation

Development Contribution Plans are regarded as 'complex' amendments under the *Planning and Development (Local Planning Schemes) Regulations 2015* and, as follows, are advertised for public comment for a period of no less than 60 days.

BACKGROUND

In accordance with TPS No.4, all landowners within Development Contribution Area (DCA) No.3 are required to contribute towards the cost of providing common infrastructure works. DCA 3 includes the City's growth suburbs of Piara Waters and the majority of Harrisdale.

Development Contribution Plan (DCP) No.3, included under Schedule 9B of TPS No.4, provides the statutory framework for the City to determine the cost of common infrastructure works within DCA 3 and establish the associated contribution cost per lot. Established in 2007, DCP 3 provides a mechanism to equitably share the cost of providing common infrastructure items across an environmentally constrained area, where the historical nature of land ownership has been considerably fragmented. A coordinated approach that DCP 3 has established for the provision of common infrastructure has enabled the City to deliver essential infrastructure and facilities to enable development to proceed with associated benefits for the Piara Waters and Harrisdale communities.

On 2 December 2022, Amendment 115 ‘North Forrestdale Contribution Plan No. 3 - Major Review Phase 1’ was approved by the then Minister for Planning, modifying the Development Contribution Area (DCA) 3 to incorporate Piara Waters West into the DCA as ‘the expansion area’. The expansion resulted in a sizeable area of additional land area being incorporated into the DCA, providing for significant areas of new residential development to occur, with a large number of development and community infrastructure projects identified as being needed by the respective communities.

DETAILS OF PROPOSAL

There are three separate Scheme modifications proposed in this Scheme Amendment as follows:

Proposal 1

This proposal includes the modification of Clause 3.14 of Schedule 9B – Development Contribution Plans, which reads as follows:

‘3.14 Expiration of Development Contribution Plan.

This Development Contribution Plan should expire twenty (20) years from the date of gazettal of Amendment No. 12, however, may also be extended for further periods, with or without modification, by subsequent Scheme Amendments.’

The previous Scheme Amendment to extend the operating period of DCP 3 by 5 years was formally gazetted 28 May 2021. The proposed amendment seeks to modify the words “twenty (20) years” as noted above to “thirty (30) years”, which will effectively result in the operating lifespan of DCP 3 being extended by a further ten (10) years.

Proposal 2

This proposal includes the modification of Clause 3.4.1 of Schedule 9B, bringing the DCP text in line with other changes adopted in a previous Scheme Amendment (Amendment 115 GG 2/12/22).

Amendment 115 included provisions to remove the density rate from being specified in the scheme, which would enable the density rate to be specified more appropriately in the Infrastructure Cost Schedule (ICS). Text modifications to the scheme provisions that were proposed under Amendment 115 inadvertently omitted the removal of all of the relevant density provisions in the Scheme. This clause currently reads as follows:

‘3.4.1 The local government will, for the purposes of apportioning Common Infrastructure Costs to Owners, make an estimate of the lot yield for the Development Contribution Area called the ‘Estimated Lot Yield’. This will be calculated by determining the number of hectares in the Development Contribution Area, excluding those land uses in Clause 3.3 of Development Contribution Plan No.3 and Clause 5A.4.4, and multiplying that area by 14.6’.

This proposal seeks to replace ‘and multiplying that area by 14.6’ with the words ‘and multiplying that area by the density rate prescribed in the Infrastructure Cost Schedule’ in order to bring the text into alignment with references to contribution calculation provisions set out in the City’s Scheme and ICS, consistent with modifications already approved by the Minister.

Proposal 3

This proposal seeks to modify Clause 3.6.3(8)(e) of Schedule 9B by inserting two commas, one after '*abutting proposed primary schools*', and the other after '*where applicable*'.

The paragraph currently reads as follows:

- (e) *100% of the total cost to construct sporting and community facilities, including land acquisition, sporting / community buildings, change rooms, car parking, toilets and playgrounds on public open space identified on the Structure Plan abutting proposed primary schools where applicable in the West Piara Urban Precinct identified in MRS Amendment 1369/57, and in Harrisdale within the area generally bounded by Ranford Road, Wright Road, Reilly Road and Skeet Road.*

This will enable correct interpretation of the clause. The paragraph should read:

- (e) *100% of the total cost to construct sporting and community facilities, including land acquisition, sporting / community buildings, change rooms, car parking, toilets and playgrounds on public open space identified on the Structure Plan abutting proposed primary schools, where applicable, in the West Piara Urban Precinct identified in MRS Amendment 1369/57, and in Harrisdale within the area generally bounded by Ranford Road, Wright Road, Reilly Road and Skeet Road.*

COMMENT

Proposal 1

DCP 3 has been operating successfully in delivering benefits for the Piara Waters and Harrisdale land developers and communities since 2007. An extension to the operational lifespan of the DCP is required for the following reasons:

Modification to DCA Boundaries (Expansion Area)

The inclusion of the Piara Waters West expansion area into the North Forrestdale DCP 3 area introduced:

- a new area of unsubdivided land with a potential additional lot yield of 1600 lots; and
- new development and community/sporting infrastructure to serve the area.

Additional DCP Infrastructure

The Major Review also resulted in modifications to the DCP to include new common infrastructure items to ensure that the resulting increase in demand for infrastructure and facilities was accounted for. Planned infrastructure introduced into DCP 3 to serve those communities was as follows:

- The land acquisition cost of new sporting and community facilities (approximately 4.8 hectares) - 8e Harrisdale North - Site 'A' to service the catchment;
- A contribution towards the development of sporting facilities, for shared community use (netball) on the Department of Education's (DoE) Piara Waters High School site;
- Provision of a shared use senior playing field adjacent to the proposed Piara Waters West Primary School, including a portion of the land acquisition; and
- The costs of land acquisition and rehabilitation of the two wetland areas.

Some elements of these projects have progressed, however the completion of all of them relies on cooperation for land acquisition, DoE support and design and construction to occur.

Recency of Added Common Infrastructure Items

While the City has been successful in delivering a significant proportion of the DCP infrastructure within the DCP area with the land developers, some key projects have been introduced in recent years, a number of which will not be capable of being fully delivered within the DCPs current operating lifespan. These projects include:

- Mason Road - The Civil design is close to being finalised with landscaping inputs being made. The project is programmed to commence 2026/2027.
- Wetland rehabilitation - Land acquisition from affected landowners is not completed yet, then remaining works will be required to be progressed.
- Post development water quality monitoring and water management initiatives - This monitoring program continues to provide important data to understand water quality in the area. Post development monitoring is required by State Government agencies to occur after land subdivision has occurred and houses are occupied. Therefore the program will need to continue for up to two years following the completion of nearly all development in the DCP area.
- Sporting and community facilities:
 - (i) Harrisdale North Playing Field and Pavillion;
 - (ii) Piara Waters West Sports Playing Field and Pavillion; and
 - (iii) Piara Waters High School Shared Netball Court facility.

Undeveloped Areas

The ability for DCP common infrastructure works to be implemented is contingent on the rate at which development occurs with the DCA. The DCP operating lifespan should align with development timeframes being forecast by landowners/developers in terms of new lot production and the related ability to deliver the DCP projects. Some landowners have not yet prepared Structure Plans for their land to enable subdivision to occur.

Proposal 2

Proposal 2 includes a change to correct an inconsistency in the Scheme and align with the intent of Amendment No.115 to allow the density calculations to be modified through the annual review of the DCP/ICS to cater for changes in the land development trends as intended in the Council's and the Minister's previous decisions on Amendment No.115.

Proposal 3

Proposal 3 includes a change to Clause 3.6.3(8)(e) of Schedule 9B by inserting two commas, to improve the wording of the Scheme as intended.

OPTIONS

1. Council may initiate the Scheme Amendment as proposed (with or without modifications).
2. Council may decline the initiation of the Scheme Amendment if it considers the proposed amendment to be contrary to the orderly and proper planning of the area or for any other reason.

CONCLUSION

Amendment No.129 includes 3 proposals, including the extension of the life of the DCP by 10 years for the reasons outlined in the report and two minor wording and grammar changes to improve the Scheme wording for the DCP arrangements. Option 1 is recommended.

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 recommendation to the WAPC/Minister for Planning for final approval.

ATTACHMENTS

There are no attachments for this report.

RECOMMEND

D5/11/25

That Council:

1. Pursuant to Section 75 of the *Planning and Development Act 2005*, initiate Amendment No.129 to Town Planning Scheme No.4 as follows:
 - a) Amending Clause 3.14 'Expiration of Development Contribution Plan' in Schedule 9B – Development Contribution Area No.3 by changing the words "twenty (20) years" to "thirty (30) years".
 - b) Amend Clause 3.4.1 of Schedule 9B – Development Contribution Area No.3 by replacing 'and multiplying that area by 14.6' by replacing this with the following words 'and multiplying that area by the density rate prescribed in the Infrastructure Cost Schedule.'
 - c) Amend Clause 3.6.3(8)(e) of Schedule 9B – Development Contribution Area No.3 by inserting two commas after 'abutting proposed primary schools' and after 'where applicable'.
2. The amendment is complex under the provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015* for the following reason(s):
 - (i) The Scheme Amendment relates to amending a Development Contribution Plan.
3. Authorise the Mayor and Chief Executive Officer to execute the relevant documents and forward the amendment to the Western Australian Planning Commission.
4. Should the Minister require any minor modifications to Amendment No.129 prior to advertising consent, authorise the Mayor and Chief Executive Officer to execute the amended documents for Amendment No.129.

Moved Cr T Thomas
MOTION CARRIED

6/0

***3.1 - APPOINTMENT OF COUNCILLORS TO OCCASIONAL ADVISORY GROUPS,
REFERENCE / WORKING GROUPS AND EXTERNAL ORGANISATIONS***

WARD : ALL
FILE No. : M/654/25
DATE : 11 November 2025
REF : NM
RESPONSIBLE : EDDS
MANAGER

In Brief:

- Following the Local Government elections on the 18 October 2025 consideration is required to be given to the appointment of Councillors to:
 - Occasional Advisory Group, Reference/ Working Groups; and
 - External/Local Organisations.
- Recommend that Council appoint nominated Councillors to Occasional Advisory Groups and External/Local Organisations, for the period November 2025 to October 2027.

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

- 1.1.2 Cultivate the sense of place generated by the City's heritage, vegetation and escarpment, wetlands and waterways as well as the participation in vibrant community hubs.
- 1.1.4 Preserve and celebrate the City's built, natural and cultural heritage.
- 4.1 Strategic Leadership and effective management.
 - 4.1.1 Advocate for the delivery of key transformational projects.
 - 4.1.2 Develop and maintain a comprehensive suite of strategies and plans to guide the City's delivery of infrastructure and services to the community.

Legal Implications

General assessment of relevant legislation (eg. *Local Government Act 1995*) has not revealed any restrictions.

Council Policy/Local Law Implications

Nil.

Budget/Financial Implications

Nil.

BACKGROUND

In addition to the formation of Council established Committees, Council also nominates representatives to occasional advisory groups, reference/working groups and external local organisations. Council may nominate representatives to such committees/organisations by a simple majority.

At its Special Meeting of 22 October 2025, Council resolved that the matter of Councillor representation on a number of advisory, reference and working groups established by Council, as well as representation on committees, reference and working groups established by external entities as referenced in this report be referred to the Development Services Committee.

For reference, those groups include:

- Community Heritage Advisory Group (CHAG);
- Canopy Cover Working Group; and
- Pickering Brook and Surrounds Sustainability and Tourism Strategy Working Group.

Unless otherwise determined by Council, the tenure of a Councillor's membership on an Advisory Group or as a delegate continues until:

- the Councillor no longer holds the office by virtue of which the Councillor became a member;
- the Councillor resigns from membership of the Advisory Group;
- the Advisory Group is disbanded; or
- the next ordinary election day;

which ever happens first.

DETAILS OF PROPOSAL

Committee is requested to consider and recommend appointments from its membership to various Committees and Groups. All appointments are for a two year period, November 2025 to October 2027.

It is preferable that delegates to CHAG are members of the Council Committee overseeing their operation. In this instance, that is the Development Services Committee. In light of the focus of the Canopy Cover Working group, it is preferable that delegates are from the Development Services Committee or the Technical Services Committee.

OCCASIONAL ADVISORY GROUPS AND REFERENCE / WORKING GROUPS

Community Heritage Advisory Group

The Community Heritage Advisory Group (CHAG) currently provides advice in regard to the Local Heritage Survey (LHS), documentation for the State Register of Heritage Places and making suggestions to the City via the Executive Director Development Services on development applications involving heritage sites.

The CHAG is a group and operates in accordance with the adopted Terms of Reference. A Delegate and a Deputy are required for nomination. The Delegate will act as the Chair of the Advisory Group.

Council / Representation Required	Prior Appointments	Meeting Details
1 Delegate 1 Deputy	Cr J Keogh Cr S J Mosey	As required.

Canopy Cover Working Group

The purpose of the Canopy Cover Working Group is to explore Canopy Cover Strategies and plans in order to inform the Urban Forest Strategy (UFS) Review and make recommendations to Council on options available to support the increase and protection of the City's Canopy Cover.

The Canopy Cover Working Group operates in accordance with the adopted Terms of Reference. The Terms of Reference do not include a minimum or maximum number of Councillors to be appointed to the Working Group.

The Canopy Cover Working Group meets approximately once every six weeks at the City of Armadale Committee Room.

Council / Representation Required	Prior Appointments	Meeting Details
Members	Mayor R Butterfield Dr C Wielinga (Chair) Cr J Keogh (Deputy) Cr M Silver Cr S J Mosey Cr S Peter Cr G Smith Cr S Stoneham	Approximately every 6 weeks

Pickering Brook & Surrounds Sustainability and Tourism Strategy Working Group

The Department of Planning, Lands and Heritage (DPLH), in conjunction with relevant State and Local Government representatives have established a Working Group that has facilitated the development of a sustainability and tourism strategy for Pickering Brook and surrounding area, which incorporates parts of the City of Armadale in the Hills Ward.

Membership of the Working Group includes the Member for Kalamunda, elected representatives and senior officers from the Cities of Kalamunda and Armadale and senior officers from state government agencies.

The focus of the Working Group will shift from development of the Strategy to implementation of the various actions that have been identified. These include collaboration on destination marketing, recommendations for updates to local planning frameworks and promotion of related elements like cycle routes and bushfire safety.

The Technical Working Group is not a decision making body and the meetings are intended to be constructive forums for open, two-way communication between working group members, consultants and the Department of Planning, Lands and Heritage.

The Pickering Brook Working Group meets on an ad hoc basis as determined by DPLH and at either the Offices of DPLH or the City of Kalamunda office.

Council / Representation Required	Prior Appointments	Meeting Details
Members	Dr C Wielinga	Ad hoc basis

ATTACHMENTS

There are no attachments for this report.

COMMITTEE RECOMMENDATION

D6/11/25

That Council:

1. Approve the following appointments to Council's established Groups for the period November 2025 to October 2027:

Occasional Advisory Group and Reference / Working Groups	Member	Deputy Member
Community Heritage Advisory Group	Cr J Keogh	Cr S J Mosey
Canopy Cover Working Group	Dr C Wielinga (Chair) Cr J Keogh (Deputy) Mayor R Butterfield Cr S J Mosey Cr M Silver Cr L Sargeson Cr G Smith Cr S Stoneham	
Pickering Brook & Surrounds Sustainability and Tourism Strategy Working Group	Dr C Wielinga	

Moved Cr J Keogh
MOTION CARRIED

6/0

MEETING CLOSED TO PUBLIC

MOVED Cr J Keogh that that the meeting be closed to members of the public as the matter to be discussed relates to the personal affairs of a person.

Motion Carried 6/0

Ms J Abbiss left the room at 8.01pm and returned at 8.02pm.

Meeting declared closed to the public at 8.01pm.

3.2 - CONFIDENTIAL - NAMING OF NEW PAVILION AT MORGAN PARK, ARMADALE

WARD : PALOMINO
FILE No. : M/656/25
DATE : 11 November 2025
REF : NM
RESPONSIBLE : Executive Director
MANAGER : Development Services

In Brief:

- A confidential report is presented at Attachment B-1 to this Agenda.
- That Council adopt the recommendation as detailed in the Confidential Report.

Strategic Implications

2.5.5 Seek opportunities to preserve documents and acknowledge the heritage of the City.

Legal Implications

Sections 5.36, 5.38 and 5.39 of *Local Government Act 1995*.

Council Policy/Local Law Implications

Council Policy Dev 2 – Naming of Roads, Parks Places and Buildings.

Budget/Financial Implications

Nil.

Consultation

1. Planning Services
2. Recreation Services
3. Program Delivery

A Confidential Report is presented at Attachment B-1 to this Agenda. The matter is considered confidential under S5.23(2) (b) of the Local Government Act 1995, as the matter relates to the personal affairs of a person.

D7/11/25

RECOMMEND

That Council adopt the recommendation as detailed in the Confidential Report.

Moved Cr L Sargeson
MOTION CARRIED

6/0

MEETING OPENED TO PUBLIC

MOVED Cr T Thomas that that the meeting be opened to members of the public at 8.03pm.
Motion Carried (6/0)

COUNCILLORS' ITEMS

Nil

EXECUTIVE DIRECTOR DEVELOPMENT SERVICES REPORT

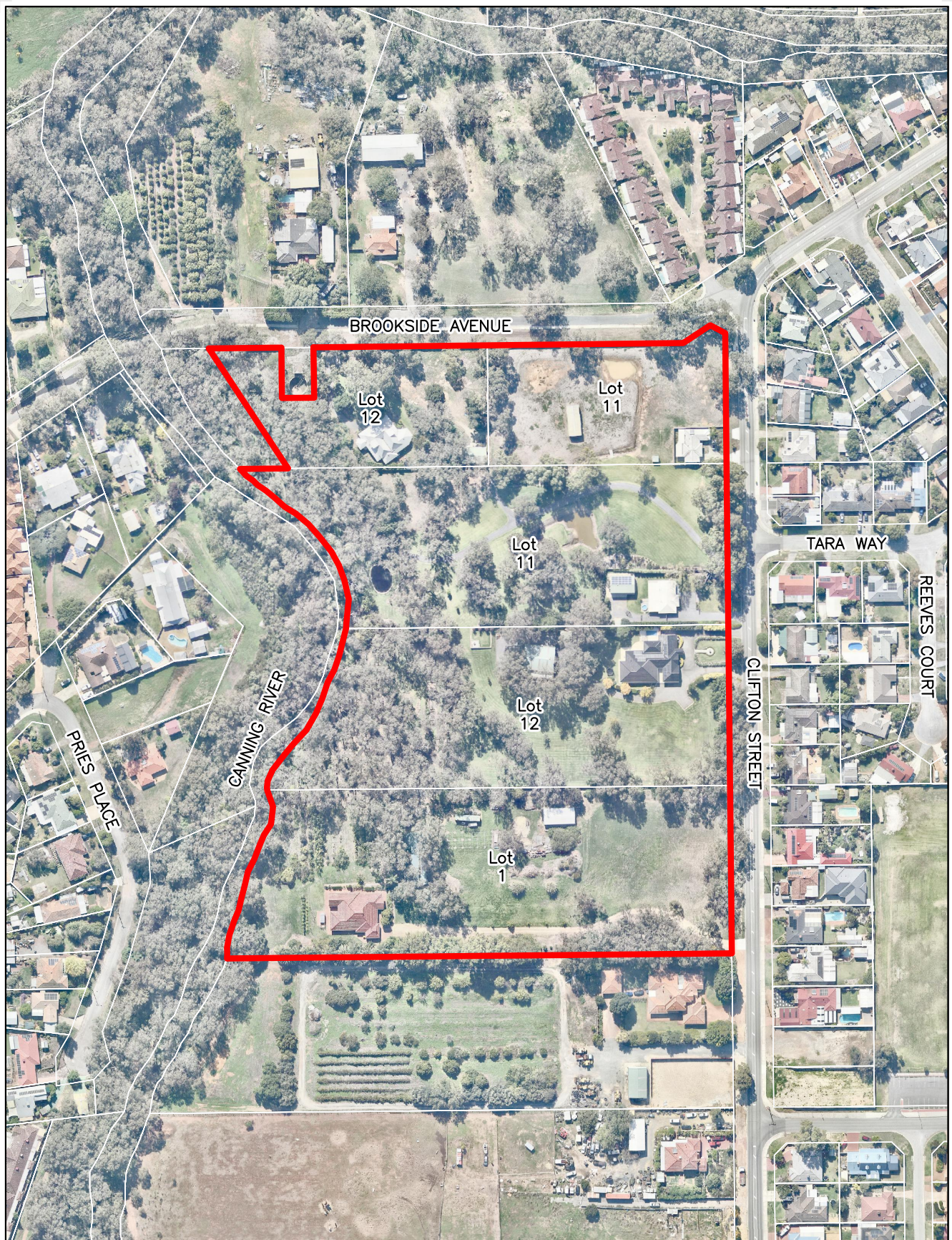
Local Government Pool Safety Barrier Inspections

- Under Division 2 of the *Building Regulations 2012*, Local Governments in Western Australia are required to conduct inspections of safety barriers around private swimming pools and spas once within every four year period. Local Governments are granted specific powers under the Regulations to support compliance activities.
- The City currently has a total of 5,631 private swimming pools.
- In 2024/2025, the City's Swimming Pool Inspector completed a total of 2,370 inspections, including mandatory inspections (1,754), non-compliant safety barrier re-inspections and new pool inspections.
- The City reported zero overdue inspections to the Department of Local Government Industry Regulation and Safety in accordance with legislative obligations in 2024/25.
- Of 139 local governments in Western Australia, 48 (34.5%) local governments reported overdue inspections.
- The City has achieved 100% compliance with mandatory Swimming Pool Inspections for the last four years, since COVID, the commencement of the City's Swimming Pool Inspection officer and expiry of the contract for the Swimming Pool Barrier Inspection service.

The Executive Director presented information on landscaping proposals in Kelmscott.

MEETING DECLARED CLOSED AT 8.17pm

DEVELOPMENT SERVICES COMMITTEE SUMMARY OF ATTACHMENTS 17 NOVEMBER 2025		
ATT NO.	SUBJECT	PAGE
1.1 STRUCTURE PLAN RECOMMENDATION TO WAPC - CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT		
1.1.1	Aerial of Structure Plan Area	88
1.1.2	Proposed Structure Plan Map - Canning River Clifton St (North)	89
1.1.3	Walkability Plan	90
1.1.4	Issues and Modifications Plan	91
1.1.5	Landscape Plan	92
1.1.6	Schedule of Submissions	93
1.1.7	Schedule of Structure Plan Issues and Modifications	169
1.1.10	Revised Structure Plan Map	193
1.2 DEVELOPMENT APPLICATION - PLACE OF WORSHIP - 8 WYGONDA ROAD, ROLEYSTONE		
1.2.1	Aerial Map	194
1.2.2	TPS Zoning	195
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1.2.6	Updated Car Parking Plan	231
1.2.7	Noise Management Plan	232
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1.3 DEVELOPMENT APPLICATION - PINDARI RESTORATION HOUSE - LOT 41 - 61 NELSON STREET BEDFORDALE		
1.3.1	Location Plan	284
1.3.2	Aerial Plan	285
1.3.3	Development Plans (July 2025)	286
1.3.4	Pindari House Supporting Document Links	289
1.3.6	Schedule of Submissions	290



AERIAL PLAN

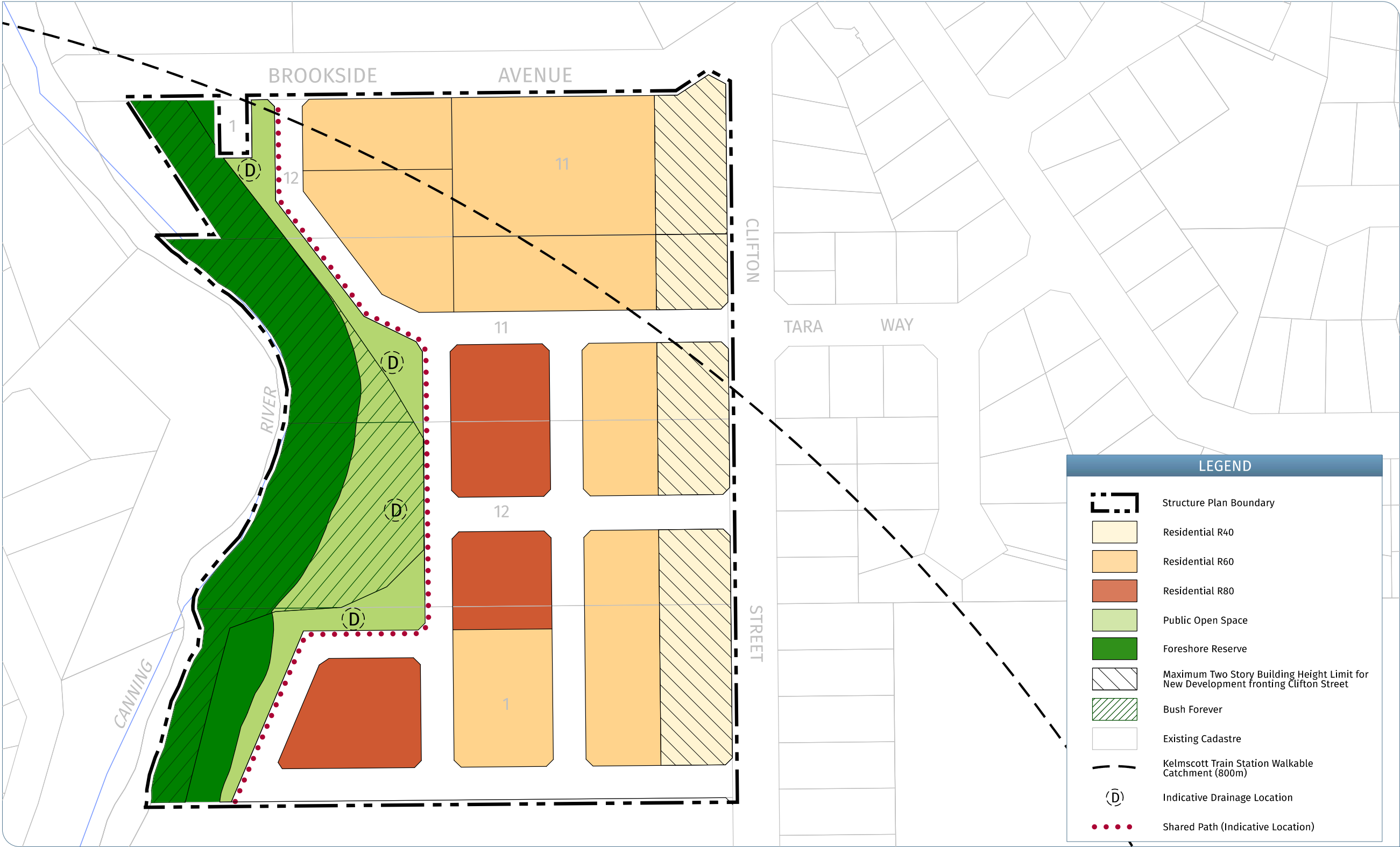
Canning River & Clifton Street (North) Precinct



SCALE 1 : 3000

DATE 17 April 2024 - REVISION 2401
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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 photograph supplied by Landgate, Photosmaps by NearMap.



LOCAL STRUCTURE PLAN

Clifton Street North Precinct,
KELMSCOTT

Plan No. | 20233-09

Date | 10/05/23

Drawn | KS

Checked | MK

Revision | F

Scale | 1:1500@A3

0

20m

40m

PERTH & FORRESDALE:

Lvl 1, 252 Fitzgerald St
PERTH WA 6000
15/2 Hensbrook Loop,
FORRESDALE WA 6112
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ALBANY | BUNBURY | BUSSELTON | FORRESDALE | PERTH

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NOTE: This plan has been prepared for planning purposes. Areas, Contours and Dimensions shown are subject to survey

Harley Dykstra

PLANNING & SURVEY SOLUTIONS



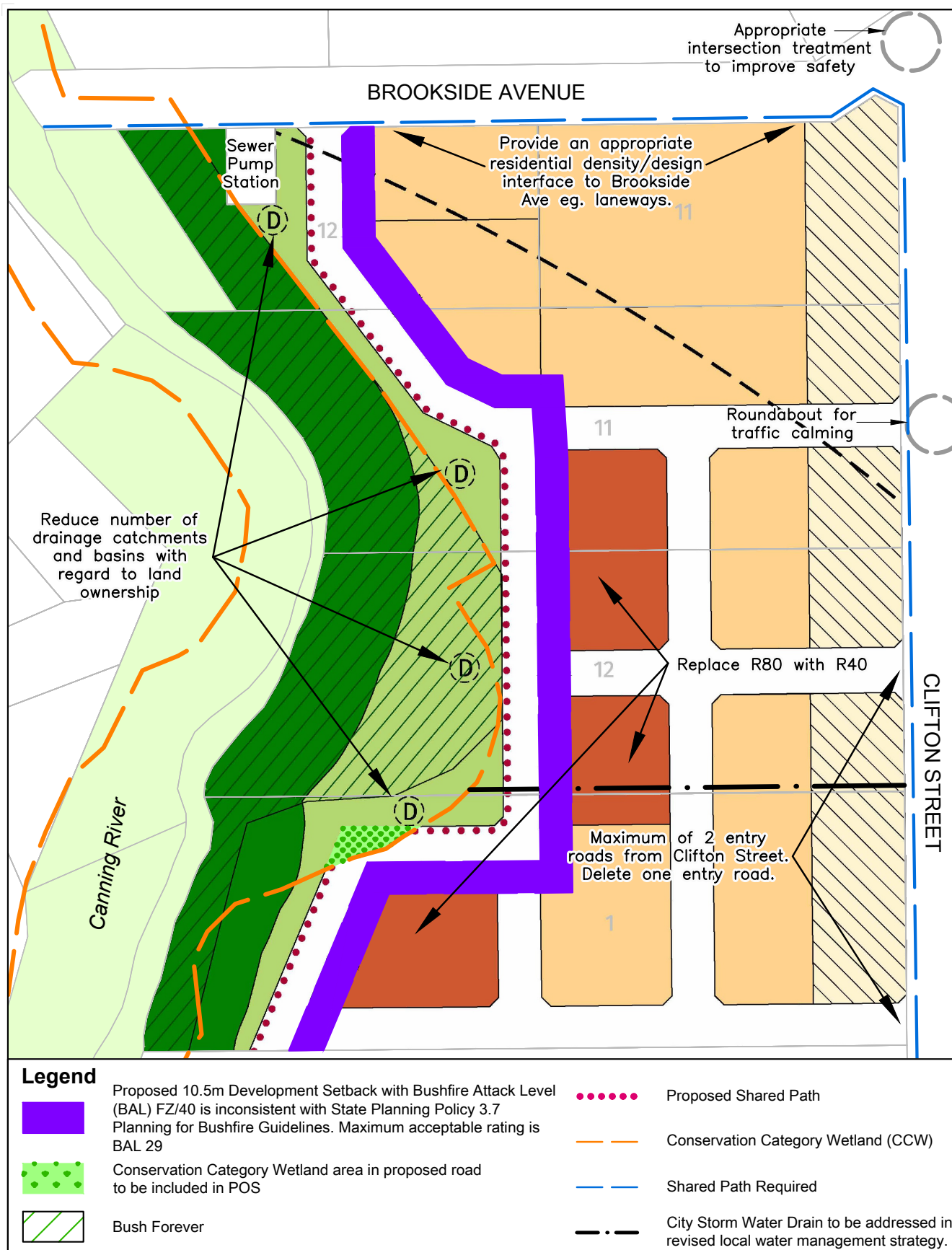
WALKABILITY PLAN

Proposed Structure Plan
Canning River & Clifton Street (North) Precinct

100 0 100 200m

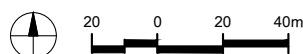


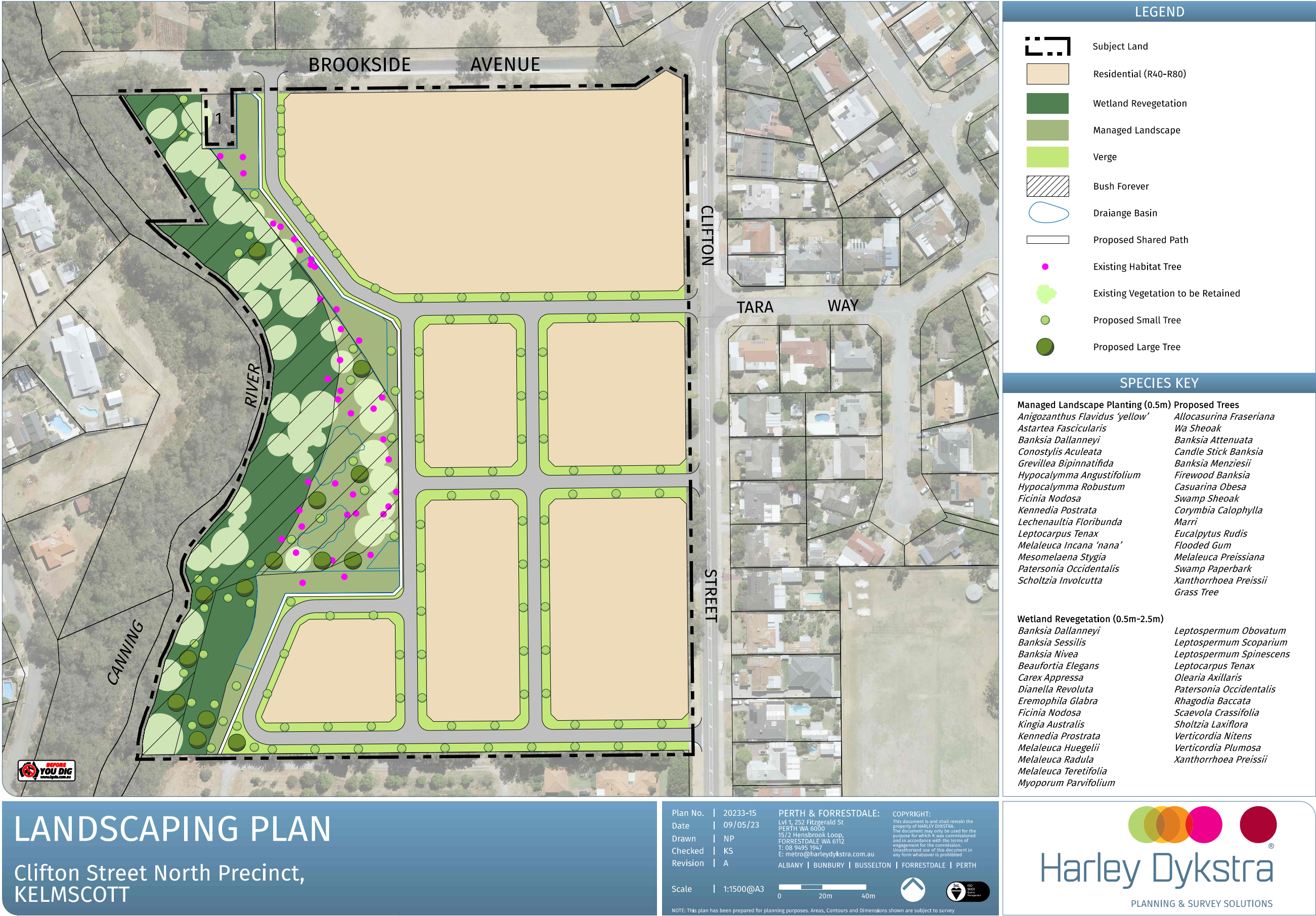
SCALE 1 : 10000



ISSUES AND MODIFICATIONS PLAN

Proposed Structure Plan
Structure Plan - Canning River & Clifton Street (North) Precinct





SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
1.	Landowner	Object (requests modification)	1.1 Structure Plan prepared by minority of landowners with Structure Plan area without input from other owners. 1.2 Public Open Clpace (POS)/drainage is inequitable distributed over land holdings with Lot 11 (cnr Clifton St & Brookside Ave) having no POS/drainage contribution. 1.3 Structure Plan does not address how stormwater from Lot 11 (cnr Brookside Ave & Clifton) will be conveyed through adjacent landholdings in the event it is developed first. 1.4 An associated developer contribution plan to compensate landowners required to accommodate other landholdings stormwater should be prepared before structure plan approval. 1.5 The north-south roads run across the natural slope of the land, resulting in the need for larger amounts of retaining, and to redirect stormwater runoff around the street blocks before it can access the detention basins adjacent to the river. 1.6 The depths of the street blocks (40m) results in 20m lot depths limiting future housing typologies most required depths of 25m-30m. 1.7 Four separate full movement intersections to the external road network is excessive only a one access to Brookside Ave and Clifton St is required. Besides these roads other internal roads should be determined through subdivision. 1.8 Don't support 4-way intersection to Tara Way as a roundabout will be required. 1.9 Structure plan should provide further detail a preliminary earthworks and staging plan that demonstrates how levels and retaining will be coordinated across landholdings. 1.10 The Structure Plan should be modified as follows: a. The proponent's land (lot 11 Brookside Avenue) provide a minimum of 10% POS including sufficient stormwater retention within the lot boundary, or alternatively a suitable cost sharing arrangement be put in place prior to approval of the structure plan to ensure an equitable distribution of open space and drainage infrastructure. b. The structure plan map be modified to delete all internal roads with the exception of the foreshore interface road. c. All intersections with Clifton Street be deleted and a provision be included requiring suitable intersections to be resolved at subdivision stage once the form of subdivision is determined.	1.1 Supported, the Applicants landholding Lot 1 (11) Clifton Street (cnr Brookside Ave) is approximately 11% of the Structure Plan area. 1.2 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns. 1.3 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns. 1.4 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns. The City would not operate a Development Contribution Plan just for developer drainage when landowners can resolve and manage themselves. 1.5 Not supported, the land outside the proposed POS/foreshore is general flat. The need for retaining would be determined at subdivision stage through civil engineering designs/plans. 1.6 Issue 2 - Housing Density and Built Form Concerns (2e). 1.7 Issue 7 -Traffic and Trasport Infrastructure Concerns (7f). 1.8 Issue 7 -Traffic and Trasport Infrastructure Concerns (7f). 1.9 Supported in part, refer to heading Local Water Management Strategy. The requirement for retaining can be considered at subdivision stage noting that with the exception of the river area the land is relatively flat. Staging is dependent on landowner decisions, so it is not possible to detail staging in the structure plan. 1.10 a) Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns. b) Issue 7 -Traffic and Trasport Infrastructure Concerns (7f) c) Issue 7 -Traffic and Trasport Infrastructure Concerns (7f) d) Refer to 1.9 above.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			d. A preliminary earthworks and staging plan be provided that demonstrates how the interface between the proponent's land and the surrounding landholdings will be managed, recognising that they are unlikely to be developed at the same time.	
2.	Landowner	support	2.1 Close to train station ideal for medium to high-density and reduce car dependency/ traffic congestion. 2.2 Close to local amenities i.e. shops and reduce car dependency/ traffic congestion. 2.3 Compatibility with similar developments i.e. two and three-storey developments in Cannington. 2.4 Increase access to the River (currently private) for residents and Frye Park. 2.5 Close to schools within walking distance. 2.6 Bushfire safety can be addressed and area located away from Scarp bushfire threat. 2.7 Improve river with urban water runoff management. 2.8 City should consider cash in lieu of POS due to existing POS in the locality.	2.1 Supported in part, the proximity of the train station still provides an opportunity for park and cycle and ride. 2.2 Supported, some shops are within the 800m walking distance. 2.3 Noted, there is no information provided on the location of the developments in Cannington. 2.4 Supported, Frye Park is within 800m walking distance of the Structure Plan area. 2.5 Supported Clifton Hills Primary School is within 800m walking distance of the Structure Plan area. 2.6 Issue 4 - Bushfire Safety Concerns 2.7 Issue 1 - Environment Impact Concerns & heading Local Water Management Strategy. 2.8 Supported in part, the City would recommend a cash-in-lieu of POS for Lo1 11 (1) Clifton St (cnr Brookside Ave).
3.	Landowner	object	3.1 Proposal will ruin character and what brings people to Clifton Hills. 3.2 Concerned that road infrastructure can't support 300 plus cars.	3.1 Issue 6 - Change/loss of Character and Visual Amenity 3.2 Issue 7 -Traffic and Trasport Infrastructure Concerns
4.	Landowner	object	4.1 Clifton Hills Primary School can't support extra students, no space for classrooms and parking and traffic problems. 4.2 Concerned that Clifton St is small two-way street and can't cope with increase traffic.	4.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 4.2 Issue 7 -Traffic and Trasport Infrastructure Concerns
5.	Landowner	object	5.1 Concerned that Clifton St will become too busy. 5.2 Too many houses for the location. 5.3 Schools already struggle with parking.	5.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 5.2 Issue 2 - Housing Density and Built Form Concerns 5.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concern
6.	Landowner	object	6.1 High density could set a precedent for same residential developments along much of this section of the Canning River. 6.2 Inconsistent with R-Code on east side of Clifton Street. 6.3 Walking distance to the central shopping area and railway station is to great to justify density. 6.4 Should be a condition of any development approval to create the river reserve, walkways and associated landscaping along the river.	6.1 Issue 10 – Other Concerns 6.2 Issue 2 - Housing Density and Built Form Concerns 6.3 Issue 2 - Housing Density and Built Form Concerns 6.4 Supported, a landscape plan acceptable to the City will be required as part of the structure plan and subdivision if approved.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			6.5 Trees on eastern and western boundary should be preserved. 6.6 The high-density development and 100year flood level will require significant construction fill and would likely destroy the mature trees. 6.7 Concern that fill and construction activity will impact river ecosystem. 6.8 New roads should not boarder river but additional landscaping should be provided. 6.9 Stormwater proposals to discharge into the river should be referred to Department of Biodiversity, Conservation and Attractions and the Swan River Trust. 6.10 Development will result in contaminates in stormwater entering the river. 6.11 Project will generate a significant increase in traffic movement in the area during the construction stage. 6.12 Increase in residents will cause a significant increase in road traffic along Clifton Street, together with a possible hazardous intersection at Brookside Avenue. Traffic calming and speed devices will definitely be required. 6.13 Impact to way of life and enjoyment of scenery. 6.14 This Structure Plan is piecemeal and the whole river foreshore should be re-examined from Brookside Avenue down to Gilwell Avenue for an appropriate design for the existing residential area.	6.5 Supported in part, refer to heading Natural Environment & Tree Retention. 6.6 Issue 1 - Environment Impact Concerns 6.7 Issue 1 - Environment Impact Concerns 6.8 Not supported, a road boarding the river provides public access and demarks the public river reserve/open space from the private residential land. 6.9 Supported, the proposal has been referred to both the mentioned agencies. 6.10 Issue 1 - Environment Impact Concerns 6.11 Issue 7 -Traffic and Trasport Infrastructure Concerns 6.12 Issue 7 -Traffic and Trasport Infrastructure Concerns 6.13 Issue 6 - Change/loss of Character and Visual Amenity 6.14 Not supported, the structure plan area is considered sufficient in area for urban planning and the outcome will guide future development of the Urban Development zone down to Gilwell Ave.
7.	Landowner	object	7.1 Too many houses for the location. 7.2 Appreciate retention of POS, bushland & foreshore.	7.1 Issue 2 - Housing Density and Built Form Concerns 7.2 Noted.
8.	Landowner	object	8.1 Development will impact our views why we brought property. 8.2 Concern development is Homeswest and increase in crime. 8.3 Concern regarding roads capacity and traffic. 8.4 Concerns regarding evacuation. 8.5 Concern development will cause rates to rise 8.6 property values to decline. 8.7 Concern regarding impact to wildlife.	8.1 Issue 2 - Housing Density and Built Form Concerns 8.2 Issue 5 - Social Impact Concerns 8.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 8.4 Issue 4 - Bushfire Safety Concerns 8.5 Issue 10 – Other Concerns 8.6 Issue 10 – Other Concerns 8.9 Issue 1 - Environment Impact Concerns
9.	Landowner	object	9.1 Concern regarding size and density. 9.2 Concern regarding impact to school. 9.3 Concern regarding impact river eco-system.	9.1 Issue 2 - Housing Density and Built Form Concerns 9.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 9.3 Issue 1 - Environment Impact Concerns
10.	Landowner	object	10.1 Concern regarding impact to adjacent residential area. 10.2 Concern regarding roads capacity and traffic. 10.3 Clifton Hills Primary School can't support extra students.	10.1 Issue 6 - Change/loss of Character and Visual Amenity 10.2 Issue 7 -Traffic and Trasport Infrastructure Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			10.4 Concern regarding increase in crime.	10.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 10.4 Issue 5 - Social Impact Concerns
11.	Landowner	object	11.1 Concern regarding additional traffic including congestion on Brookside Ave and Clifton St at school drop-off time.	11.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
12.	Landowner	object	12.1 Height (2+ storeys), bulk, scale or appearance of buildings will impact outlook/views of the river land, it's trees and vegetation. Maximum R40 should apply. 12.2 Development will decrease property values. 12.3 Increased population levels would increase traffic, noise and smell affecting health (including mental). 12.4 Increase in pollution – litter and hazardous and human type waste with greater population. 12.5 Increase in traffic congestion at intersections Clifton St/Gilwell Ave, Brookside Ave/Connell Ave, and Butler Pass/Tara Wy accessing the Clifton Hills Primary School. 12.6 Increase in traffic on Connell Ave has not been evaluated. 12.7 Environmental impacts such as air or water pollution or land degradation. 12.8 Health and safety concerns including bushfire risk/evacuation concerns due to extra residents and limited egress routes from the area noting 2011 bushfires and Connell Ave was closed. 12.9 Increase in crime rate. 12.10 Concerns regarding capacity of local schools for additional/ students/pupils including traffic and parking issues. 12.11 Train and bus station parking is already full. 12.12 Concern regarding Acid Sulfate Soils and impact to river during construction. 12.13 Concern regarding monitoring of ground water levels. 12.14 Concern regarding run-off to the river due to low soil permeability and R60 and R80 density.	12.1 Issue 2 - Housing Density and Built Form Concerns 12.2 Issue 10 – Other Concerns 12.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 12.4 Issue 1 - Environment Impact Concerns 12.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 12.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 12.7 Issue 1 - Environment Impact Concerns 12.8 Issue 4 - Bushfire Safety Concerns 12.9 Issue 5 - Social Impact Concerns 12.10 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 12.11 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 12.12 Supported, an Acid Sulfate Soils assessment and management plan (if required) would be required at subdivision stage. 12.13 Issue 1 - Environment Impact Concerns 12.14 Issue 1 - Environment Impact Concerns
13.	Landowner	object	13.1 Against small block size, larger block sizes are what Kelmscott has going for it.	13.1 Issue 2 - Housing Density and Built Form Concerns
14.	Landowner	object	14.1 Proposals takes away from character of area – big blocks, space and nature and lifestyle. 14.2 We pay our rates to maintain area the way we like.	14.1 Issue 6 - Change/loss of Character and Visual Amenity & Issue 1 - Environment Impact Concerns 14.2 Issue 6 - Change/loss of Character and Visual Amenity

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
15.	Landowner	object	15.1 Clifton Hills Primary School can't support extra students, no space for classrooms and parking and traffic problems especially on Clifton and Butler Pass at peak time. 15.2 Removal of trees will displace animals and upset local ecosystem. 15.3 R80 density is too high and R40 and R60 density only.	15.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 15.2 Issue 1 - Environment Impact Concerns 15.3 Issue 2 - Housing Density and Built Form Concerns
16.	Landowner	object	16.1 Concern regarding adequacy of existing infrastructure. 16.2 School is too small. 16.3 Bushfire evacuation escape route concerns. 16.4 Concern regarding increase in crime. 16.5 Concern regarding provision of sewer as some properties are on septic systems. 16.6 Blocks should be 500sqm for families.	16.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 16.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 16.3 Issue 4 - Bushfire Safety Concerns 16.4 Issue 5 - Social Impact Concerns 16.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 16.6 Issue 2 - Housing Density and Built Form Concerns
17.	Landowner	object	17.1 Concern regarding extra traffic. 17.2 Concern regarding impact to river and wildlife. 17.3 Concern regarding crime and anti-social behaviour.	17.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 17.2 Issue 1 - Environment Impact Concerns 17.3 Issue 5 - Social Impact Concerns
18.	Landowner	object	18.1 Concern regarding environmental impacts. 18.2 Concern regarding social impacts.	18.1 Issue 1 - Environment Impact Concerns 18.2 Issue 5 - Social Impact Concerns
19.	Landowner	object	19.1 Concern new houses will be low quality. 19.2 Concern regarding property devaluation. 19.3 Concern regarding increase in anti-social behaviour. 19.4 Concern regarding adequacy of infrastructure.	19.1 Not supported, houses are required to be built to National Construction Code Standards. 19.2 Issue 10 – Other Concerns 19.3 Issue 5 - Social Impact Concerns 19.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
20.	Landowner	object	20.1 Development negatively impacts community amenity. 20.2 Concern regarding adequacy of infrastructure – roads, school and medical centre. 20.3 Concern regarding clearing close to the river. 20.4 Small blocks are detrimental to local environment.	20.1 Issue 6 - Change/loss of Character and Visual Amenity 20.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 20.3 Issue 1 - Environment Impact Concerns 20.4 Issue 2 - Housing Density and Built Form Concerns
21.	Landowner	object	21.1 No comments provided.	21.1 Noted.
22.	Landowner	object	22.1 Bushfire safety concerns lack of escape routes only Gilwell Ave/bridge.	22.1 Issue 4 - Bushfire Safety Concerns
23.	Landowner	object	23.1 Concern regarding increase traffic.	23.1 Issue 7 -Traffic and Trasport Infrastructure Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			23.2 Concerns new housing will be cheap rentals for unfavourable people. 23.3 Concern small lots will reduce trees for wildlife.	23.2 Issue 5 - Social Impact Concerns 23.3 Issue 1 - Environment Impact Concerns and heading Natural Environment & Tree Retention
24.	Landowner	object	24.1 Came to the area to send kids to school and get away from surrounding area. 24.2 Development will bring unsavoury characters to the area.	24.1 Issue 6 - Change/loss of Character and Visual Amenity 24.2 Issue 5 - Social Impact Concerns
25.	Landowner	object	25.1 Concern regarding impact to river and flora and fauna. 25.2 Concern regarding adequacy of road infrastructure roads in and out of the area are single carriageways and attract through traffic. 25.3 Clifton Hills Primary School and Kelmscott high schools are at capacity.	25.1 Issue 1 - Environment Impact Concerns 25.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 25.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
26.	Landowner	comment	26.1 Local road networks need upgrading. 26.2 If a vehicle crossing bridge at Brookside Ave/Turner Pl is not required Clifton St and Gilwell Ave need to be upgraded. 26.3 Traffic management at Clifton St/Butler Pass is required due to congestion associated with school drop off/pick up. 26.4 Pedestrian Safety on Clifton Street due to increase traffic and speeding needs to be addressed. 26.5 Traffic estimates need to consider traffic from Structure Plan area to the south of Gilwell St not just the proposed structure plan.	26.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 26.2 Issue 7 -Traffic and Trasport Infrastructure Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 26.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 26.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 26.5 Issue 7 -Traffic and Trasport Infrastructure Concerns
27.	Landowner	object	27.1 Against high density in the area.	27.1 Noted.
28.	Landowner	object	28.1 Concern regarding capacity of schools, roads and local amenities. 28.2 Concern regarding impact to Canning River.	28.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns & Issue 7 -Traffic and Trasport Infrastructure Concerns 28.2 Issue 1 - Environment Impact Concerns
29.	Landowner	object	29.1 High density not in keeping with the area and will ruin it.	29.1 Issue 6 - Change/loss of Character and Visual Amenity
30.	Landowner	object	30.1 Bushfire evacuation concerns as no extra escape routes proposed. 30.2 Concern regarding loss of trees. 30.3 Concern regarding loss of sense of community.	30.1 Issue 4 - Bushfire Safety Concerns 30.2 Issue 1 - Environment Impact Concerns and heading Natural Environment & Tree Retention 30.3
31.	Landowner	object	31.1 Concern regarding capacity of schools for new students. 31.2 Concern regarding loss of semi-rural feel. 31.3 Large apartments need to be close to centres.	31.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 31.2 Issue 6 - Change/loss of Character and Visual Amenity 31.3 Issue 2 - Housing Density and Built Form Concerns
32.	Landowner	object	32.1 Concern regarding adequacy of roads. 32.2 Concern regarding capacity of Clifton Hills Primary School for new students.	32.1 Issue 7 -Traffic and Trasport Infrastructure Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
				32.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
33.	Landowner	object	33.1 No comments provided.	33.1 Noted.
34.	Landowner	object	34.1 Bushfire evacuation concerns. 34.2 Clifton Hills Primary School can't support extra students, no space for classrooms and parking and traffic problems. 34.3 Concerns development will increase crime i.e. drug use and break-ins. 34.4 Concern regarding loss of trees and impact to river. 34.5 Concern regarding loss of character and community feel. 34.6 Property devaluation concerns.	34.1 Issue 4 - Bushfire Safety Concerns 34.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 34.3 Issue 5 - Social Impact Concerns 34.4 Issue 1 - Environment Impact Concerns and Natural Environment & Tree Retention 34.5 Issue 6 - Change/loss of Character and Visual Amenity 34.6 Issue 10 – Other Concerns
35.	Landowner	object	35.1 Population increase for this area and would put pressure on schools and roads, especially Gilwell Ave. 35.2 High-density is out of character for the location with blocks being significantly smaller than nearby blocks in the area. 35.3 Increase in population would make it difficult for residence to evacuate in the event of a bush fire. 35.4 Train station is greater than 800m when walking distance is measured.	35.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns & Issue 7 -Traffic and Transport Infrastructure Concerns 35.2 Issue 2 - Housing Density and Built Form Concerns 35.3 Issue 4 - Bushfire Safety Concerns 35.4 Issue 2 - Housing Density and Built Form Concerns
36.	Landowner	object	36.1 Already too much high density in Kelmscott. 36.2 Development will bring unsavoury people, more break-ins, noise complaints and litter. 36.3 Development will destroy and pollute river system. 36.4 Development will killing off native fauna and flora.	36.1 Issue 2 - Housing Density and Built Form Concerns 36.2 Issue 5 - Social Impact Concerns 36.3 Issue 1 - Environment Impact Concerns 36.4 Issue 1 - Environment Impact Concerns and regarding roadkill, signage along the proposed POS interface road could be installed to alert drivers to the potential for wildlife crossing roads.
37.	Landowner	object	37.1 Development will lead to increase traffic. 37.2 Disrupt school community. 37.3 Safety concerns. 37.4 Disrupt neighbourhood charm.	37.1 Issue 7 -Traffic and Transport Infrastructure Concerns 37.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 37.3 Issue 5 - Social Impact Concerns 37.4 Issue 6 - Change/loss of Character and Visual Amenity
38.	Landowner	object	38.1 Structure Plan design acceptable subject to following changes: i. Half number of dwellings ii. Redesign Brookside/Clifton intersection.	38.1 i. Issue 2 - Housing Density and Built Form Concerns ii. Issue 7 -Traffic and Transport Infrastructure Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			iii. Build a road bridge to link Brookside Ave and Turner Place. iv. No laneway lots. v. Upgrade Gliwell Ave/Page Rd intersection.	iii. Supported in part, the City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. iv. Not supported, laneway lots are common at medium densities and provided for in Liveable Neighbourhoods Policy. v. Issue 7 -Traffic and Trasport Infrastructure Concerns
39.	Landowner	object	39.1 R40 and R60 is too 'sudden' of a transition and will contrast to the existing urban fabric. 39.2 The target market for this density is investors who don't care about the social fabric of the neighbourhood. 39.3 Concern regarding small living areas and building orientation. 39.4 Poor building design will devalue existing properties in the area. 39.5 Concern smaller housing and roads will not be able to accommodate larger vehicles. and extra vehicles of family members. 39.6 POS/Foreshore beneficial to community. 39.7 Bushfire evacuation concerns due to traffic congestion and only 3 escape routes.	39.1 Issue 2 - Housing Density and Built Form Concerns 39.2 Not supported, future land tenure is not a consideration in urban planning. 39.3 Noted, dwellings will be required to comply with R-Codes living area requirements and dwellings will be orientated north south east west to maximise solar access. 39.4 Issue 2 - Housing Density and Built Form Concerns 39.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 39.6 Supported, ceding of the POS/foreshore allows for public access. 39.7 Issue 4 - Bushfire Safety Concerns
40.	Landowner	object	40.1 Damage to riverbank and removal of bushland. 40.2 Adequacy of infrastructure i.e. supermarket parking. 40.3 Bushfire evacuation concerns.	40.1 Issue 1 - Environment Impact Concerns 40.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 40.3 Issue 4 - Bushfire Safety Concerns
41.	Landowner	object	41.1 Bushfire evacuation concerns due to additional traffic using 3 evacuation routes. 41.2 Clifton Hills Primary School can't support extra students.	41.1 Issue 4 - Bushfire Safety Concerns 41.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
42.	Landowner	object	42.1 Density is too high for existing roads resulting in gridlock and noise pollution. 42.2 Add stress to electrical infrastructure.	42.1 Issue 2 - Housing Density and Built Form Concerns & Issue 7 -Traffic and Trasport Infrastructure Concerns 42.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
43.	Landowner	object	43.1 Negative impact i.e. illegal dumping to Canning River wildlife and bushland with public access. 43.2 Negative impact to existing atmosphere and lifestyle of the community 43.3 Increase in traffic issues including blind corner at Clifton St and Brookside Ave.	43.1 Issue 1 - Environment Impact Concerns 43.2 Issue 6 - Change/loss of Character and Visual Amenity 43.3 Issue 7 -Traffic and Trasport Infrastructure Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
44.	Landowner	object	44.1 Increased traffic. 44.2 Clifton Hills Primary School can't support extra students. 44.3 Anti-social behaviour. 44.4 Too many dwellings so infrastructure can't cope.	44.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 44.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 44.3 Issue 5 - Social Impact Concerns 44.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
45.	Landowner	object	45.1 Schools, roads and facilities are not adequate without upgrades. 45.2 Pedestrian safety issues from extra traffic at school time. 45.3 Bushfire evacuation concerns due to limited access to Albany Hwy.	45.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 45.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 45.3 Issue 4 - Bushfire Safety Concerns
46.	Landowner	object	46.1 Moved from Seville Grove to area to escape crime i.e. drug dealing, run down urban environment and safety concerns. 46.2 Concern regarding adequacy of shops, school, parks and roads form development. 46.3 Concern regarding impact to community.	46.1 Issue 5 - Social Impact Concerns 46.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 46.3 Issue 6 - Change/loss of Character and Visual Amenity
47.	Landowner	object	47.1 Stormwater management concerns as structure plan report infers that stormwater drainage could be discharged into the river and the installation of other services could have a significant adverse impact on the health of the Canning River. Small rainfall events best managed at sources to reduce POS basin size. 47.2 Concern development will increase run-off to river containing contaminates. 47.3 Size and locations of the stormwater basins proposed in the POS compromise its function and would result unusable/ untraversable space often cutting off access between different areas of POS completely. 47.4 The bulk and scale of the buildings due to the high-density unfriendly and unwelcoming atmosphere proposed on the river-side would overshadow the POS. Density would look out of place given existing density in the area. 47.5 Density exceeding the target set out in Perth and Peel@3.5 million strategic document. 47.6 Unclear whether 50m estuaries in clause 6.1.1 of SPP Guideline 2.9 setback is being achieved. 47.7 DBCA should be consulted to determine the appropriate setback. 47.8 Concerns regarding overcrowding of Clifton Hill Primary School. 47.9 Concerns regarding pedestrian safety due to increase in traffic associated with development. 47.10 High density development will set a precedent for similar developments.	47.1 Issue 1 - Environment Impact Concerns 47.2 Issue 1 - Environment Impact Concerns 47.3 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns & heading Foreshore & Public Open Space Provision. 47.4 Issue 2 - Housing Density and Built Form Concerns 47.5 Issue 2 - Housing Density and Built Form Concerns 47.6 Issue 1 - Environment Impact Concerns 47.7 Issue 1 - Environment Impact Concerns 47.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 47.9 Issue 7 -Traffic and Trasport Infrastructure Concerns 47.10 Issue 10 – Other Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
48.	Landowner	object	48.1 Against high density and development over 2 storeys. 48.2 Moved to the area for friendly community and care for bushland, river and wildlife. 48.3 Concern regarding capacity of Clifton Hill Primary School. 48.4 Development driven by greedy landowners.	48.1 Issue 2 - Housing Density and Built Form Concerns 48.2 Issue 6 - Change/loss of Character and Visual Amenity 48.3 Noted.
49.	Landowner	object	49.1 Destructive to calm beautiful suburb. 49.2 Concern about new residents and drug use. 49.3 Family will leave if development occurs.	49.1 Issue 6 - Change/loss of Character and Visual Amenity 49.2 Issue 5 - Social Impact Concerns 49.3 Noted.
50.	Landowner	object	50.1 Impact to community wellbeing. 50.2 Impact to environment and landscapes. 50.3 Area is for families and retirees. 50.4 Capacity of roads and schools.	50.1 Issue 5 - Social Impact Concerns and/or Issue 6 - Change/loss of Character and Visual Amenity 50.2 Issue 1 - Environment Impact Concerns and/or Issue 6 - Change/loss of Character and Visual Amenity 50.3 Issue 5 - Social Impact Concerns 50.4 Issue 7 -Traffic and Transport Infrastructure Concerns
51.	Landowner	object	51.1 Concern regarding adequacy of roads for more traffic. 51.2 Loss of tree canopy. 51.3 Adequacy of schools and other social infrastructure to accommodate students from development. 51.4 Area should be R25 to match existing residential density.	51.1 Issue 7 -Traffic and Transport Infrastructure Concerns 51.2 Issue 1 - Environment Impact Concerns 51.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 51.4 Issue 2 - Housing Density and Built Form Concerns
52.	Landowner	object	52.1 Puts pressure on the schools and the roads. 52.2 Demolish the small knit community that Clifton Hills. 52.3 Will move is development goes ahead.	52.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns and Issue 7 -Traffic and Transport Infrastructure Concerns 52.2 Issue 6 - Change/loss of Character and Visual Amenity 52.3 Noted.
53.	Landowner	object	53.1 Bushfire evacuation routes are limited to Connel Ave and Gilwell Ave.	53.1 Issue 4 - Bushfire Safety Concerns
54.	Landowner	object	54.1 Concerned regarding impact to both 20 Turner Place & 26 Connell Avenue, Kelmscott. 54.2 Density is too high should be R40 only. 54.3 Pedestrian access over Brookside Ave /Turner Pl bridge should be maintained.	54.1 Noted. 54.2 Issue 2 - Housing Density and Built Form Concerns 54.3 Supported, pedestrian access will be maintained.
55.	Landowner	object	55.1 Degradation to the area and school community and students will struggle. 55.2 Will devalue properties.	55.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 55.2 Issue 10 – Other Concerns
56.	Landowner	object	56.1 No comments provided.	56.1 Noted.

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
57.	Landowner	object	57.1 Area is not close to city centre and multi-storey development will be an eyesore. 57.2 new residents not the type of people to improve the area. 57.3 Infrastructure – shops, parking and traffic management inadequate.	57.1 Issue 2 - Housing Density and Built Form Concerns 57.2 Issue 5 - Social Impact Concerns 57.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
58.	Landowner	object	58.1 Bushfire evacuation more difficult with more residents/traffic. 58.2 Retain bushland and river as is.	58.1 Issue 4 - Bushfire Safety Concerns 58.2 Issue 1 - Environment Impact Concerns
59.	Landowner	object	59.1 Existing roads cannot support another 395 dwellings. In particular Gilwell Ave is going to be heavily congested during peak hours therefore not safe during bushfire evacuation. 59.2 Both Clifton Hills Primary School and Kelmscott Senior High School would struggle with a large influx of extra students. 59.3 Lack of parking at Clifton Hills Primary School during peak hour would become more of a problem. 59.4 Pedestrian (school kids) safety concerns due to parking and extra traffic. 59.5 Increase in crime due to smaller dwellings gardens and indoor pace. 59.6 Concerned that removal of trees and greenery pollution brought to the area will negatively affect the river, wildlife and biodiversity in the region. 59.7 Concern regarding urban heat island effect due to high density buildings. 59.8 Concern regarding train station parking to accommodate new resident's vehicles. 59.9 Loss of small-town community feel by adding hundreds of tiny dwellings.	59.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 59.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 59.3 Issue 7 -Traffic and Trasport Infrastructure Concerns & Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 59.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 59.5 Issue 5 - Social Impact Concerns 59.6 Issue 1 - Environment Impact Concerns 59.7 Issue 1 - Environment Impact Concerns 59.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 59.9 Issue 6 - Change/loss of Character and Visual Amenity
60.	Landowner	object	60.1 High density flats are an eyesore, will encourage vandalism, graffiti and dumping. 60.2 Infrastructure can't cope with extra population. 60.3 Will impact wildlife in the area. 60.4 Will impact scenery and feel of the area.	60.1 Issue 2 - Housing Density and Built Form Concerns & Issue 5 - Social Impact Concerns 60.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 60.3 Issue 1 - Environment Impact Concerns 60.4 Issue 6 - Change/loss of Character and Visual Amenity
61.	Landowner	object	61.1 High density will have a detrimental environmental impact to river front and surrounding bushland flora and fauna. 61.2 High turnover of future residents will create social, security and community issues. 61.3 Current services and infrastructure i.e., schools, supermarkets, roads, medical will not support such an influx. 61.4 Current community bought in the area based on the lifestyle and current planning not high density.	61.1 Issue 1 - Environment Impact Concerns 61.2 Issue 5 - Social Impact Concerns 61.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 61.4 Issue 6 - Change/loss of Character and Visual Amenity

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
62.	Landowner	object	62.1 Height (2+ storeys), bulk, scale or appearance of buildings would be visually out of place in single storey area. 62.2 R40 to R80 at odds with adjoining R15/25 coding. 62.3 Increased population levels would increase traffic, noise, smell and light in the area. 62.4 Health and safety concerns including bushfire risk/evacuation concerns due to extra residents and retirees in development are vulnerable and would be at risk. 62.5 Concerns regarding capacity of local schools for additional/ students/pupils and not addressed in proposal. 62.6 Concern regarding adequacy of local medical including Armadale Hospital and local GPs.	62.1 Issue 2 - Housing Density and Built Form Concerns 62.2 Issue 2 - Housing Density and Built Form Concerns 62.3 Not supported, these are normal considerations in planning processes. 62.4 Issue 4 - Bushfire Safety Concerns 62.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 62.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
63.	Landowner	object	63.1 High density will impact the surrounding community and the environment 63.2 Extra pupils and traffic is already straining roads and infrastructure at pick up and drop off times. 63.3 Future housing will be rentals with constant turnover of tenants and rubbish dumped within the complex along the Canning River.	63.1 Issue 1 - Environment Impact Concerns & Issue 6 - Change/loss of Character and Visual Amenity 63.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 63.3 Not supported, the City does not control housing tenure and the concern lacks evidenced that rubbish dumping will occur and Issue 5 - Social Impact Concerns.
64.	Landowner	object	64.1 Density is too high. 64.2 Concern regarding urban heat island effect. 64.3 Concern regarding adequacy of sewer and power grid. 64.4 Clifton Hills Primary School can't support extra students and increase in student teach ratio.	64.1 Issue 2 - Housing Density and Built Form Concerns 64.2 Issue 1 - Environment Impact Concerns 64.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 64.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
65.	Landowner	object	65.1 Increase in population will lead to a significant surge in traffic congestion, especially on Clifton St /Brookside Ave and impact quality of life. 65.2 Additional students at local school will lead to parking issues erode the sense of community. 65.3 Proposal does not align with the character and scale of our neighbourhood leading to the loss of green spaces, increased noise levels, and a decline in the overall quality of life. 65.4 A higher crime rates due to increased population density and anonymity.	65.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 65.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 65.3 Issue 6 - Change/loss of Character and Visual Amenity 65.4 Issue 5 - Social Impact Concerns
66.	Landowner	object	66.1 High density will bring low-income families and drag the community down.	66.1 Issue 5 - Social Impact Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
67.	Landowner	object	67.1 Devalue properties from increase traffic. 67.2 Clifton Hills Primary School can't support extra students. 67.3 Bushfire evacuation concerns only Gilwell Ave and Turner Place/Brookside Ave footbridge for residents.	67.1 Issue 10 – Other Concerns 67.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 67.3 Issue 4 - Bushfire Safety Concerns
68.	Landowner	object	68.1 Exist on Gilwell Ave has traffic problems and roads are not designed for more traffic.	68.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
69.	Landowner	object	69.1 No comments provided.	69.1 Noted.
70.	Landowner	object	70.1 Concern regarding impact to Hospital.	70.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
71.	Landowner	object	71.1 Addition of multiple two-storey buildings with an extremely large number of residents would be out of place with adjacent quite suburb. 71.2 Volumes of traffic on the local roads with the related increase in road noise effecting the whole of Clifton Street and connecting streets. 71.3 There would also be severe disruptions to roads during construction. 71.4 Bushfire safety concerns regarding retirement village in the development. 71.5 Bushfire evacuation concerns due to limited exists and made worse by more residents. 71.6 Clifton Hills Primary School is already at capacity and using portable buildings also impact to Kelmscott Primary School. 71.7 Impact to Armadale Hospital is not considered especially as development includes retirement village. 71.8 Impact to commercial amenities such as supermarkets, gyms, and cafés has not been considered which impact the lifestyle of current resident. 71.9 Would contribute to climate change.	71.1 Issue 6 - Change/loss of Character and Visual Amenity 71.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 71.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 71.4 Not supported, development of the structure plan area would reduce the fire risk in the locality. The City requested removal of the retirement village use in the Structure Plan as it was not adequately justified however the use could be considered subject to a development application. Refer to Agenda Report Issue 4b for further comments. 71.5 Issue 4 - Bushfire Safety Concerns 71.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 71.7 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 71.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 71.9 Not supported, the submission does not demonstrate this impact.
72.	Landowner	object	72.1 Extra traffic will cause congestion. 72.2 Hard impact to local schools. 72.3 disruption to land and wildlife. 72.4 High density housing completely changing the look of our area.	72.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 72.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 72.3 Issue 1 - Environment Impact Concerns 72.4 Issue 6 - Change/loss of Character and Visual Amenity
73.	Landowner	object	73.1 Don't want more people in our safe community.	73.1 Issue 5 - Social Impact Concerns
74.	Landowner	object	74.1 No comments provided.	74.1 Noted.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
75.	Landowner	object	75.1 Will increase crime. 75.2 Will destroy the river and bush. 75.3 Future low budget housing will be occupied by drug uses and troublemakers.	75.1 Issue 5 - Social Impact Concerns 75.2 Issue 1 - Environment Impact Concerns 75.3 Issue 5 - Social Impact Concerns
76.	Landowner	object	76.1 Will it adversely affect the natural habitat, flora/fauna of the river reserve. 76.2 Will adversely affect the Clinton hills community. 76.3 Roads will not cope with the level of traffic generated. 76.4 Local schools will not be able to support potential large influx of students. 76.5 Concern regarding impact to property values. 76.6 Concern regarding lower socio-economic graphic, increase in crime, trash and uncleanness etc typically come with these dense developments. 76.7 Should be larger blocks 800m².	76.1 Issue 1 - Environment Impact Concerns 76.2 Issue 6 - Change/loss of Character and Visual Amenity 76.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 76.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 76.5 Issue 10 – Other Concerns 76.6 Issue 5 - Social Impact Concerns 76.7 Not supported Issue 2 - Housing Density and Built Form Concerns
77.	Landowner	object	77.1 Will congest the roads. 77.2 Will attract the wrong type of people into the community which is quiet, peaceful and close knit.	77.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 77.2 Issue 5 - Social Impact Concerns
78.	Landowner	object	78.1 The appeal of the area - quieter, less crowded, more space, less parking issues, less traffic, more natural space semi-rural feel and why we live here will be lost. 78.2 If approved similar projects will follow and change the area so I may move out.	78.1 Issue 6 - Change/loss of Character and Visual Amenity 78.2 Noted.
79.	Landowner	object	79.1 Will ruin the suburb and bring the wrong people into the area.	79.1 Issue 5 - Social Impact Concerns
80.	Landowner	object	80.1 Development will result in too much traffic. 80.2 Schools and day care will be overloaded. 80.3 The future housing will be occupied by low-income people and families resulting in crime and will be afraid to go out in public place.	80.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 80.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 80.3 Issue 5 - Social Impact Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
81.	Landowner	object	81.1 No one wants this.	81.1 Noted.
82.	Landowner	object	82.1 Concern regarding impact to their property.	80.1 Noted.
83.	Landowner	object	83.1 Extra roof tops will be ugly.	83.1 Issue 2 - Housing Density and Built Form Concerns
84.	Landowner	object	84.1 Will cause excessive traffic and noise pollution. 84.2 Two storey homes facing Clifton Street takes away the privacy in our home with multiple homes facing ours. 84.3 Pedestrian Safety concerns due to increase in traffic. 84.4 Destruction of local wildlife. 84.5 Will bring anti-social behaviour. 84.6 Residents facing it should be compensated for the noise pollution from trucks and building works as well as the view that we will lose with two story buildings being built opposite.	84.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 84.2 Issue 2 - Housing Density and Built Form Concerns 84.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 84.4 Issue 1 - Environment Impact Concerns 84.5 Issue 5 - Social Impact Concerns 84.6 Not supported, the WAPC's processes does not provide for compensation loss of views or other potential impacts.
85.	Landowner	object	85.1 No comments provided.	85.1 Noted.
86.	Landowner	object	86.1 Property devaluation concerns. 86.2 Increase traffic and safety concerns.	86.1 Issue 10 – Other Concerns 86.2 Issue 7 -Traffic and Trasport Infrastructure Concerns
87.	Landowner	object	87.1 Local school is at capacity. 87.2 Road are already very busy especially in the morning and afternoon. 87.3 More crime in the area. 87.4 Concern regarding urban water run off affecting river and wildlife. 87.5 Concern regarding loss of views and enjoyment of rural style community.	87.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 87.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 87.3 Issue 5 - Social Impact Concerns 87.4 Issue 1 - Environment Impact Concerns 87.5 Issue 6 - Change/loss of Character and Visual Amenity
88.	Landowner	object	88.1 Concerned with increase in crime and traffic. 88.2 Concerned with impact to local wildlife. 88.3 Bushfire evacuation concerns due to lack of road exists.	88.1 Issue 5 - Social Impact Concerns & Issue 7 -Traffic and Trasport Infrastructure Concerns 88.2 Issue 1 - Environment Impact Concerns 88.3 Issue 4 - Bushfire Safety Concerns
89.	Landowner	object	89.1 Local area offers bigger blocks and a nice country feel and a great community. There is no need to introduce tiny blocks and estate style living.	89.1 Issue 2 - Housing Density and Built Form Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
90.	Landowner	object	90.1 Impact to 41 Roberts Road, Kelmscott. 90.2 Concern regarding increase crime. 90.3 Concern regarding increase traffic 90.4 Concern regarding impact to local wildlife 90.5 Bushfire evacuation concerns as not enough exit roads. 90.6 Local school is too small for extra students. 90.7 Density will destroy beautiful area what people love here.	90.1 Noted. 90.2 Issue 5 - Social Impact Concerns 90.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 90.4 Issue 1 - Environment Impact Concerns 90.5 Issue 4 - Bushfire Safety Concerns 90.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 90.7 Issue 6 - Change/loss of Character and Visual Amenity
91.	Landowner	object	91.1 No comments provided.	91.1 Noted.
92.	Landowner	object	92.1 Schools, shops and environment can't cope.	92.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns & Issue 1 - Environment Impact Concerns
93.	Landowner	object	93.1 Refer to Submission 6.1 to 6.14 above. 93.2 Concern with repetitive built form. 93.3 Concern where development will be sewerred. 93.4 Bushfire evacuation concerns due to only 2 bridges.	93.1 Refer to Submission 6.1 to 6.14 above. 93.2 Issue 2 - Housing Density and Built Form Concerns 93.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 93.4 Issue 4 - Bushfire Safety Concerns
94.	Landowner	object	94.1 Turn suburb into a ghetto. 94.2 Road capacity concerns 94.3 School capacity concerns.	94.1 Issue 5 - Social Impact Concerns 94.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 94.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
95.	Landowner	object	95.1 Concerns regarding increase population density in comparison to current density in the area. 95.2 Proposal is contrary to City of Armadale Urban Forestry Strategy vision for diverse landscapes and trees and proactive landscape planning. 95.3 Population increase into would strain electricity, water and sewage services. 95.4 Concern regarding capacity of Clifton Hill Primary School and Kelmscott High School to accommodate extra students from development and impact to education standards. 95.5 Concern regarding capacity of train to accommodate more commuters.	95.1 Issue 2 - Housing Density and Built Form Concerns 95.2 Issue 1 - Environment Impact Concerns & Agenda Report heading Natural Environment & Tree Retention 95.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 95.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 95.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
96.	Landowner	comment	96.1 Concerns regarding traffic. 96.2 Concerns regarding capacity of Clifton Hills Primary School. 96.3 Concerns regarding impact to river habitat. 96.4 Community safety concerns. 96.5 Developer should respond to community feedback.	96.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 96.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 96.3 Issue 1 - Environment Impact Concerns 96.4 Issue 5 - Social Impact Concerns 96.5 Supported, the City has requested the applicant modify the Structure Plan in response to relevant issues and concerns.
97.	Landowner	object	97.1 Does not agree with high rise housing and 1500 extra people.	97.1 Issue 2 - Housing Density and Built Form Concerns
98.	Landowner	object	98.1 Development is too big.	98.1 Issue 2 - Housing Density and Built Form Concerns
99.	Landowner	object	99.1 Opposed to the high density and its impact to adjacent area of low density with larger blocks. 99.2 High density has minimal space for green space and trees. 99.3 Lack of canopy cover will lead to urban heat island impacts. 99.4 Development removes vital river habitat corridor. 99.5 Disagree with the TIA applying a 1 percent annual growth rate to traffic as the development of the size proposed will significant impact more than 1 per cent. 99.6 Concern regarding increase traffic on Clifton St between Brookside Ave and Gilwell Ave. 99.7 Development would cause damage to nature of our area and the amenity residents. 99.8 Put a strain on the existing infrastructure.	99.1 Issue 2 - Housing Density and Built Form Concerns 99.2 Issue 2 - Housing Density and Built Form Concerns 99.3 Issue 1 - Environment Impact Concerns 99.4 Issue 1 - Environment Impact Concerns 99.5 Supported in part, the City. has requested modelling of traffic based on development of the entire Canning River Clifton Street Urban Development Precinct to more accurately establish future traffic volumes/flows. 99.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 99.7 Issue 1 - Environment Impact Concerns 99.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
100.	Landowner	object	100.1 Concern regarding environmental impact especially the local river and bush areas where the flora and fauna are already struggling. 100.2 Infrastructure, roads sewage and power are not able to support this high-density development. 100.3 Low-cost housing will result in crime. 100.4 Property values will decline. 100.5 Increase traffic on Clifton Street. 100.6 Negative impact to semi-rural, peaceful and beautiful corner of Kelmscott and big block character. 100.7 Bushfire evacuation concerns as only 2 bridges over the river and Connell Ave was blocked due to fire during the 2011 bushfires roads became grid locked. 100.8 Proposed densities are too high in comparison to adjacent residential R15. 100.9 Concern regarding impact to river and fauna and rubbish and silt entering the river and disturbing wildlife. 100.10 Concern regarding built form impact of high density. 100.11 Concern about removal of trees and Structure Plan reports don't address nesting sites for birds other than Cockatoos. 100.12 Concern regarding consultation with Aboriginal community.	100.1 Issue 1 - Environment Impact Concerns 100.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 100.3 Issue 5 - Social Impact Concerns 100.4 Issue 10 – Other Concerns 100.5 Issue 7 -Traffic and Transport Infrastructure Concerns 100.6 Issue 6 - Change/loss of Character and Visual Amenity 100.7 Issue 4 - Bushfire Safety Concerns 100.8 Issue 2 - Housing Density and Built Form Concerns 100.9 Issue 1 - Environment Impact Concerns 100.10 Issue 2 - Housing Density and Built Form Concerns 100.11 Issue 1 - Environment Impact Concerns 100.12 Issue 8 - Heritage Concerns
101.	Landowner	object	101.1 Disruptive to our quiet community and not in keeping with area. 101.2 Bushfire evacuation concerns as not enough exit roads.	101.1 Issue 6 - Change/loss of Character and Visual Amenity 101.2 Issue 4 - Bushfire Safety Concerns
102.	Landowner	support	102.1 Will provide economically viable housing. 102.2 Request wastewater (sewerage) services connection to my property in conjunction with this development.	102.1 Supported, the development would increase smaller varied housing stock. 102.2 Not supported, the landowner/developer is not obliged to connect properties outside the structure plan area to sewer.
103.	Landowner	object	103.1 Developments height, scale and appearance unacceptable in comparison to natural landscape and existing residential. 103.2 Height will impact privacy and streetscapes. 103.3 Negative impact on the traffic of the local area. 103.4 Concern regarding construction impacts - lengthy road works and air pollution impacting health. 103.5 Bushfire risk due to growing bottleneck with more residents.	103.1 Issue 2 - Housing Density and Built Form Concerns 103.2 Issue 2 - Housing Density and Built Form Concerns 103.4 Issue 7 -Traffic and Transport Infrastructure Concerns 103.5 Issue 4 - Bushfire Safety Concerns
104.	Landowner	object	104.1 Refer to Submission 6.1 to 6.14 above.	104.1 Refer to Submission 6.1 to 6.14 above.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
105.	Landowner	object	105.1 Will lose community feel. 105.2 Increased risk of injury due to the density of traffic. 105.3 Development will disturb visual relief from built up suburbs. 105.4 Concern regarding cultural heritage and protection of important sites for future generations. 105.5 Concern high density is too close to Canning River/Bush Forever. 105.6 Concern regarding increase in litter and dumping in the river. 105.7 Concern regarding stormwater contaminants entering the river. 105.8 Height, bulk, scale and appearance of dwellings would be visually out of place with existing area. 105.9 Development will increase noise pollution smell and lighting. 105.10 No proposals to address Brookside Ave/Clifton St dangerous blind corner. 105.11 Pedestrian safety concerns due to speeding on Clifton Street. 105.12 Bushfire evacuation concerns due to limited escape routes – Turner Pl/ Brookside Ave footbridge and Gilwell Ave bridge i.e. 2011 bushfires. 105.13 Concerns regarding urban heat island effect. 105.14 Concerns regarding capacity of Armadale Hospital.	105.1 Issue 6 - Change/loss of Character and Visual Amenity 105.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 105.3 Issue 6 - Change/loss of Character and Visual Amenity 105.4 Issue 8 - Heritage Concerns 105.5 Issue 1 - Environment Impact Concerns 105.6 Issue 1 - Environment Impact Concerns & Issue 5 - Social Impact Concerns 105.7 Issue 1 - Environment Impact Concerns 105.8 Issue 2 - Housing Density and Built Form Concerns 105.9 Issue 1 - Environment Impact Concerns 105.10 Issue 7 -Traffic and Trasport Infrastructure Concerns 105.11 Issue 7 -Traffic and Trasport Infrastructure Concerns 105.12 Issue 4 - Bushfire Safety Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 105.13 Issue 1 - Environment Impact Concerns 105.14 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
106.	Landowner	object	106.1 School cannot accommodate more residents. 106.2 Bushfire risk not enough roads in and out of area.	106.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 106.2 Issue 4 - Bushfire Safety Concerns
107.	Landowner	object	107.1 Concern that roads are not designed for high traffic volumes. 107.2 Concern regarding safety of children due to increase in traffic. 107.3 Negative impact to existing lifestyle and why we bought in the area. 107.4 Negative impact to property values. 107.5 Potential increase in crime.	107.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 107.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 107.3 Issue 6 - Change/loss of Character and Visual Amenity 107.4 Issue 10 – Other Concerns 107.5 Issue 5 - Social Impact Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
108.	Landowner	object	108.1 Environmental impact to the river due to rubbish and chemical run-off. 108.2 Noise pollution. 108.3 Construction work impacts. 108.4 Concern regarding the capacity of Clifton Hill Primary School and Kelmscott Primary School to accommodate additional students from development including lack of parking, traffic/pedestrian safety issues and decline in education standards/outcomes. 108.5 Block sizes will be too small for garden should be R40 minimum. 108.6 Bushfire evacuation concerns due to only 3 escape routes with possible closure due to works or bushfire itself. 108.7 Small house lack outdoor space for recreation and visitors. 108.8 Concern development will become run down like apartments in Kelmscott city centre.	108.1 Issue 1 - Environment Impact Concerns 108.2. Supported in part, the general rise in noise level due to urban development is not a planning consideration, but instance of noise activity can be investigated by the City in accordance with the Noise Regulations. 108.3 Issue 1 - Environment Impact Concerns 108.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 108.5 Issue 2 - Housing Density and Built Form Concerns 108.6 Issue 4 - Bushfire Safety Concerns 108.7 Issue 2 - Housing Density and Built Form Concerns 108.8 Issue 5 - Social Impact Concerns
109.	Landowner	object	109.1 Object to the proposed high-density development too dense. 109.2 Will bring problems to roads and traffic and schools. 109.3 Concern regarding environmental impact being so close to the river and the removal of trees.	109.1 Issue 2 - Housing Density and Built Form Concerns 109.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 109.3 Issue 1 - Environment Impact Concerns
110.	Landowner	support	110.1 Against urban sprawl and support infill of existing residential areas. 110.2 Area is close to public transport and amenities so it's a good location for increased housing density. 101.3 Will activate the Canning River and will be a great benefit to the local community.	110.1 Supported, the structure plan area is well located in respect to public amenities i.e., Clifton Hills Primary School and local parks and Kelmscott Commercial centre and transport hub. 110.2 Supported, refer to 110.1 above. 110.3 Supported, ceding of the foreshore and POS allows for public access/enjoyment.
111.	Landowner	object	111.1 Increase in people in suburb with limited access/egress also placing pressure on local amenities and schools.	111.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
112.	Landowner	object	112.1 Concern regarding overpopulation, environmental, social and economic sustainability. 112.2 Infrastructure and roads inadequate and not safe for emergency issues.	112.1 Issue 1 - Environment Impact Concerns & Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 112.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
113.	Landowner	object	113.1 Concern regarding increase traffic congestion particularly on Gilwell Ave and associated pedestrian safety. 113.2 Increase traffic will negatively impact the tranquillity and comfort of our residential neighbourhood including noise and pollution. 113.3 Additional bridge over the river required to alleviate the potential burden on Gilwell Ave.	113.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 113.2 Issue 6 - Change/loss of Character and Visual Amenity 113.3 Issue 7 -Traffic and Trasport Infrastructure Concerns. The TIA need to consider the need for a traffic bridge at Turner Pl / Brookside Ave.
114.	Landowner	object	114.1 Moved to Clifton Hills for quite lifestyle. 114.2 Concerned with parking for small houses when families become multi-generational. 114.3 School will become overcrowded. 114.4 Bushfire evacuation concerns due to more road congestion. 114.5 high density will bring undesirable people to the area and reduce safety. 114.6 land clearing will result in loss of habitat and more pollution.	114.1 Issue 6 - Change/loss of Character and Visual Amenity 114.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 114.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 114.4 Issue 4 - Bushfire Safety Concerns 114.5 Issue 5 - Social Impact Concerns 114.6 Issue 1 - Environment Impact Concerns
115.	Landowner	object	115.1 Concerns regarding increase traffic, speed and pedestrian safety. 115.2 School is already at capacity. 115.3 Will devalue properties.	115.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 115.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 115.3 Issue 10 – Other Concerns
116.	Landowner	object	116.1 This is silly please plant trees instead.	116.1 Issue 1 - Environment Impact Concerns
117.	Landowner	object	117.1 Concerned about speeding and pedestrian safety.	117.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
118.	Landowner	object	118.1 Detrimental to biology and environmental values of river zone. 118.2 Concern regarding extra traffic as roads in the areas are inadequate. 118.3 Will increase anti-social behaviour.	118.1 Issue 1 - Environment Impact Concerns 118.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 118.3 Issue 5 - Social Impact Concerns
119.	Landowner	object	119.1 Will bring extra traffic to Clifton St Brookside Ave which is already bad at peak school pick up drop off. 119.2 Schools are already full.	119.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 119.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
120.	Landowner	object	120.1 No comments provided.	120.1 Noted.
121.	Landowner	object	121.1 High density housing in such a concentrated location would affect the environment and river system. 121.2 Effect property values. 121.3 Will bring low-socioeconomic status persons and crime. 121.4 Chose the area for tranquillity.	121.1 Issue 2 - Housing Density and Built Form Concerns 121.2 Issue 10 – Other Concerns 121.3 Issue 5 - Social Impact Concerns 121.4 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
122.	Landowner	object	122.1 Will increased traffic and noise level. 122.2 Schools will not be able to cope with the increased number of children. 122.3 Environment concerns in general.	112.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 122.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 122.3 Issue 1 - Environment Impact Concerns
123.	Landowner	object	123.1 Concerned regarding impact on the river 123.2 Concerned regarding number of high-density dwellings proposed at this site does not align with surrounding area.	123.1 Issue 1 - Environment Impact Concerns 123.2 Issue 2 - Housing Density and Built Form Concerns
124.	Landowner	object	124.1 Increase in traffic and potentially lowering the demographic.	124.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
125.	Landowner	object	125.1 Refer to Submission 6.1 to 6.14 above.	125.1 Refer to Submission 6.1 to 6.14 above.
126.	Landowner	object	126.1 Refer to Submission 6.1 to 6.14 above.	126.1 Refer to Submission 6.1 to 6.14 above.
127.	Landowner	object	127.1 Risk of overcrowding, fire and pollution of the river and cutting of trees and to wildlife.	127.1 Issue 2 - Housing Density and Built Form Concerns and Issue 1 - Environment Impact Concerns
128.	Landowner	object	128.1 Area will lose of areas the tranquil vibe. 128.2 Local schools, parks and road will not be able to cope with influx of people. 128.3 Bushfire evacuation concerns due to additional people and roads becoming grid locked. 128.4 Cheap housing will attract low socio-economic residents which will increase crime in the area. 128.5 Environmental impacts to native wildlife and river system.	128.1 Issue 6 - Change/loss of Character and Visual Amenity 128.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns & Issue 7 -Traffic and Trasport Infrastructure Concerns 128.3 Issue 4 - Bushfire Safety Concerns 128.4 Issue 5 - Social Impact Concerns 128.5 Issue 1 - Environment Impact Concerns
129.	Landowner	object	129.1 Adding more low socioeconomic housing in the area with up to 1000 residents will add to break ins, theft vandalism in the area. 129.2 Moved to area as it is nice quiet neighbourhood compared to other side of train station which will be no longer is plan goes ahead. 129.3 Property devaluation concerns.	129.1 Issue 5 - Social Impact Concerns 129.2 Issue 6 - Change/loss of Character and Visual Amenity 129.3 Issue 10 – Other Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
130.	Landowner	object	130.1 Concern regarding removal of mature trees, a habitat for birds including white tailed Black Cockatoo. 130.2 Development will cause urban heat island. 130.3 Against R80 adjacent to environmentally sensitive river. 130.4 Increase in traffic will cause pollution, noise and congestion. 130.5 Bushfire emergency consequences could be fatal. 130.6 A traffic bridge at Turner Pl/Brookside Ave should be considered. 130.7 Concern regarding capacity of Clifton Hills Primary School and high school. 130.8 Develop should have bigger blocks, more POS and environmentally sustainable designed housing.	130.1 Issue 1 - Environment Impact Concerns 130.2 Issue 1 - Environment Impact Concerns 130.3 Issue 2 - Housing Density and Built Form Concerns 130.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 130.5 Issue 4 - Bushfire Safety Concerns 130.6 Issue 7 -Traffic and Trasport Infrastructure Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 130.7 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 130.8 Issue 2 - Housing Density and Built Form Concerns
131.	Landowner	support	131.1 More houses in a safe area for families near schools, shops, doctors, public transport - Kelmscott train station and good for elderly people and students (non-drivers). 131.2 Will reducing cars on the roads. 131.3 Good for businesses in the area. 131.4 Public space near the river allows everyone to enjoy not just the landowners.	131.1 Supported, the structure plan area is well located in respect to public amenities i.e., Clifton Hills Primary School and local parks and Kelmscott Commercial centre and transport hub. 131.2 Supported, 131.3 Supported, the development of the structure plan area will increase the business population catchment. 131.4 Supported.
132.	Landowner	object	132.1 Lots are too small in comparison to exiting area large blocks with trees.	132.1 Issue 2 - Housing Density and Built Form Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
133.	Landowner	object	133.1 Addition of multiple two-storey buildings with an extremely large number of residents would be out of place with adjacent quite suburb. 133.2 Volumes of traffic on the local roads with the related increase in road noise effecting the whole of Clifton Street and connecting streets. 133.3 There would also be severe disruptions to roads during construction. 133.4 Bushfire safety concerns regarding retirement village in the development. 133.5 Bushfire evacuation concerns due to limited exists and made worse by more residents. 133.6 Clifton Hills Primary School is already at capacity and using portable buildings also impact to Kelmscott Primary School. 133.7 Impact to Armadale Hospital is not considered especially as development includes retirement village. 133.8 Impact to commercial amenities such as supermarkets, gyms, and cafés has not been considered which impact the lifestyle of current resident. 133.9 Not enough space for trees and bushland for local wildlife and ecosystem to supplement the building development. 133.10 Would contribute to climate change.	133.1 Issue 2 - Housing Density and Built Form Concerns 133.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 133.3 Issue 1 - Environment Impact Concerns 133.4 Issue 4 - Bushfire Safety Concerns 133.5 Issue 4 - Bushfire Safety Concerns 133.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 133.7 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 133.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 133.9 Issue 2 - Housing Density and Built Form Concerns 133.10 Not supported, the submission does not demonstrate this impact.
134.	Landowner	object	134.1 Concern regarding traffic impact with more housing. 134.2 Will have a harmful impact on nature reserves and river and wildlife. 134.3 School can't cope with influx of new residents. 134.4 Crime and hooning (speeding) will increase. 134.5 damage peaceful and tight kinit community.	134.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 134.2 Issue 1 - Environment Impact Concerns 134.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 134.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 134.5 Issue 5 - Social Impact Concerns
135.	Landowner	object	135.1 Proposal will cause habitat destruction and disrupt local wildlife. Protecting our natural environment and biodiversity should take high priority. 135.2 Proposal will increase traffic congestion and pose a safety risks. 135.3 The quiet, peaceful environment that attracted residents to this area will be compromised. 135.4 Proposal will lead to overcrowding and increase in crime. 135.5 There will be insufficient parking. 135.6 High-density will increased noise levels and pollution from construction activities. 135.7 Will alter the serenity and close-knit feel of community.	135.1 Issue 1 - Environment Impact Concerns 135.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 135.3 Issue 6 - Change/loss of Character and Visual Amenity 135.4 Issue 2 - Housing Density and Built Form Concerns & Issue 5 - Social Impact Concerns 135.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 135.6 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
136.	Landowner	object	136.1 Concern the development won't have sufficient parking. 136.2 Density is too high as limited road access in an out of the area. 136.3 Public open space provision is insufficient as most is Bush Forever and drainage and unusable so POS should be increased for recreation.	136.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 136.2 Issue 2 - Housing Density and Built Form Concerns 136.3 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns
137.	Landowner	object	137.1 Medium to high density development in Clifton Hills (KelmScott) is inconsistent with current neighbourhood character. 137.2 Proposal has not taken into consideration the existing neighbourhood character such as lot sizes, streetscape, front setbacks, architectural style, building form, height, building materials, location and size of private open space. 137.3 A compromise R20 coding zoning should be agreed. 137.4 A 2 storey height limit should be imposed. 137.5 Local primary school will become overcrowded and education standard will decline. 137.6 Current trains services cannot cope with existing passenger numbers let alone more. 137.7 Traffic concerns local roads will become congested nad dangerous for children as traffic is already backed up along Gilwell Ave past Page Rd and the bridge on Gilwell Ave. 137.8 Additional residents/students will contribute to parking problems as Clifton Hills Primary School. 137.9 Proposal will increase urban heat island effect. Verge should be wider for shade trees and larger shade trees with developments.	137.1 Issue 2 - Housing Density and Built Form Concerns 137.2 Issue 2 - Housing Density and Built Form Concerns 137.3 Issue 2 - Housing Density and Built Form Concerns 137.4 Issue 2 - Housing Density and Built Form Concerns 137.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 137.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 137.7 Issue 7 -Traffic and Trasport Infrastructure Concerns 137.8 Issue 7 -Traffic and Trasport Infrastructure Concerns 137.9 Issue 1 - Environment Impact Concerns
138.	Landowner	object	138.1 A local development plan (LDP) for R60 and R80 be considered to limit parking to 1 bay possibly some without parking bays as close to station. 138.2 Concern regarding increase in traffic including limited access in and out of the area. 138.3 POS has limited recreation function due to basins and Bush Forever and should be increased in area.	138.1 Issue 2 - Housing Density and Built Form Concerns 138.2 Issue 1 - Environment Impact Concerns 138.3 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns
139.	Landowner	object	139.1 Will lead to overcrowding and traffic congestion on local roads. 139.2 Potential harm to environmentally significant areas including animal habitat like the reserve and Bush Forever land. 139.3 Potential to obstruct views. 139.4 Potential to disrupt peaceful community.	139.1 Issue 2 - Housing Density and Built Form Concerns & Issue 7 -Traffic and Trasport Infrastructure Concerns 139.2 Issue 1 - Environment Impact Concerns 139.3 Issue 2 - Housing Density and Built Form Concerns 139.4 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
140.	Landowner	object	140.1 Development will destroy eco-system and displace thousands of species of wildlife including the local magpies. 140.2 The Brookside Ave/Clifton St corner is already dangerous. 140.3 Clifton Hills Primary School is already overcrowded and demountable classrooms occupying oval/play space. 140.4 Bushfire evacuation concerns due to roads becoming grid locked in 2011 bushfires and more residents/cars worsening the problem. 140.5 Not enough day cares in the area for more demand. 140.6 Closure of train service will put more pressure on roads. 140.7 Impact to the semi-rural lifestyle, why I moved here.	140.1 Issue 1 - Environment Impact Concerns 140.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 140.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 140.4 Issue 4 - Bushfire Safety Concerns 140.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 140.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 140.7 Issue 6 - Change/loss of Character and Visual Amenity
141.	Landowner	support	141.1 Infill to reduce urban sprawl and destruction of vegetation. 141.2 More people to live in close proximity to public transport. 141.3 Higher density allows people to get into the housing market with smaller reasonably priced homes. 141.4 Will provide public open space along the river to benefit the wider community which is now restricted to the public. 141.5 River can be rehabilitated; weeds reduced and promote river health.	141.1 Supported, The structure plan area is well located in respect to public amenities i.e., Clifton Hills Primary School and local parks and Kelmscott Commercial centre and transport hub. 141.2 Supported in part, the City recommends the R60 and R80 be removed and replaced with R40 (medium) density. The proximity of the train station still provides an opportunity for park or cycle and ride. 141.3 Supported, the City supports affordable housing types. 141.4 Supported, agreed. 141.5 Supported, the POS/Foreshore would be rehabilitated by the developer at subdivision stage.
142.	Landowner	object	142.1 Bushfire evacuation concerns due to limited escape routes including closer of Connell Ave and Orlando St during 2011 bushfires. An additional bridge over the river is required. 142.2 Aboriginal peoples should be consulted regarding impact to local ecosystem.	142.1 Issue 4 - Bushfire Safety Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 142.2 Issue 8 - Heritage Concerns
143.	Landowner	object	143.1 Purchased due to the friendly and safe nature of the area which will change with high density. 143.2 Views would be blocked by 2-3 storey buildings. 143.3 High density brings safety concerns.	143.1 Issue 6 - Change/loss of Character and Visual Amenity 143.2 Issue 2 - Housing Density and Built Form Concerns 143.3 Issue 5 - Social Impact Concerns
144.	Landowner	object	144.1 No comments provided.	144.1 Noted.

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
145.	Landowner	object	145.1 Bushfire evacuation concerns especially for elderly/people with children/disabilities due to only 3 exits to Albany Highway (Gilwell Bridge, Orlando Bridge, Connell Avenue), and if the bushland along Connell is on fire, there's only 2 main exits example being 2011 bushfires. Extra housing/population will worsen traffic congestion situation. 145.2 Loss of large trees and bushland around the river. 145.3 Buffer zone around the river is not wide enough. 145.4 Concern development is built in the flood plain. 145.5 Rubbish and fertilisers from the development will pollute the river. 145.6 Lack of parking in high density developments. 145.7 Multi-storey homes, overlooking each other and into backyards, causing issues with privacy for some people. 145.8 Prefer development with larger block sizes. 145.9 Concern regarding adequacy of train service to accommodate extra patrons from development.	145.1 Issue 4 - Bushfire Safety Concerns 145.2 Issue 1 - Environment Impact Concerns 145.3 Issue 1 - Environment Impact Concerns 145.4 Issue 1 - Environment Impact Concerns 145.5 Issue 1 - Environment Impact Concerns 145.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 145.7 Issue 2 - Housing Density and Built Form Concerns 145.8 Issue 2 - Housing Density and Built Form Concerns 145.9 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
146.	Landowner	object	146.1 If proposal goes ahead, it will bring huge amounts of traffic and petty crime to the area. 146.2 Density is too high. 146.3 Residents value the space and tranquillity that the suburb provides and would agree this will not bring any benefit.	146.1 Issue 7 -Traffic and Trasport Infrastructure Concerns & Issue 5 - Social Impact Concerns 146.2 Issue 2 - Housing Density and Built Form Concerns 146.3 Issue 6 - Change/loss of Character and Visual Amenity
147.	Landowner	support	147.1 Plan allows more people to live in Kelmscott. 147.2 I can downsize to a smaller property in the area. 147.3 The foreshore can be rehabilitated. 147.4 Will assist in preventing urban sprawl.	147.1 Supported, agreed. 147.2 Supported, agreed. 147.3 Supported, the POS/Foreshore would be rehabilitated by the developer at subdivision stage. 147.4 Supported, the structure plan area is well located in respect to public amenities i.e., Clifton Hills Primary School and local parks and Kelmscott Commercial centre and transport hub.
148.	Landowner	object	148.1 Concerned regarding height and appearance of buildings. 148.2 Traffic will be a problem especially around the school and lack of parking. 148.3 Damage will be done to river and birds that come to the area. 148.4 Train Station is too remote. 148.5 School can't cope with student influx.	148.1 Issue 2 - Housing Density and Built Form Concerns 148.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 148.3 Issue 1 - Environment Impact Concerns 148.4 Issue 2 - Housing Density and Built Form Concerns 148.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
149.	Landowner	object	149.1 Will increase crime rate. 149.2 Will increase traffic and noise.	149.1 Issue 5 - Social Impact Concerns 149.2 Issue 7 -Traffic and Trasport Infrastructure Concerns
150.	Landowner	object	150.1 Density too high. 150.2 Will increase crime.	150.1 Issue 2 - Housing Density and Built Form Concerns 150.2 Issue 5 - Social Impact Concerns
151.	Landowner	support	151.1 Will provide homes for families and will help with rental and housing crisis.	151.1 Supported, agreed.
152.	Landowner	object	152.1 Proposal will devalue properties. 152.2 unnecessarily overcrowding. 152.3 Will affect the riverside nad nature. 152.4 Developed areas wouldn't be able to handle a development of this size, traffic, amenities etc. 152.5 Will take away country/city lifestyle.	152.1 Issue 10 – Other Concerns 152.3 Issue 2 - Housing Density and Built Form Concerns 152.3 Issue 1 - Environment Impact Concerns 152.4 Issue 7 -Traffic and Trasport Infrastructure Concerns & Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 152.5 Issue 6 - Change/loss of Character and Visual Amenity
153.	Landowner	support	153.1 Need young families any youth in the area. 153.2 Support access to the Canning River (POS).	153.1 Supported, the City supports diversity in household types and affordable housing. 153.2 Supported, the POS/Foreshore would be rehabilitated by the developer at subdivision stage.
154.	Landowner	object	154.1 Too many dwellings on the river front will ruin the areas tranquillity and peacefulness. 154.2 Concerned about traffic management.	154.1 Issue 2 - Housing Density and Built Form Concerns 154.2 Issue 7 -Traffic and Trasport Infrastructure Concerns
155.	Landowner	comment	155.1 Support lower density development. 155.2 A new bridge over river to Albany Highway is required for bushfire evacuation.	155.1 Issue 2 - Housing Density and Built Form Concerns 155.2 Issue 4 - Bushfire Safety Concerns. The TIA need to consider the need for a traffic bridge at Turner Pl / Brookside Ave.
156.	Landowner	object	156.1 Development too intense and infrastructure can't cope. 156.2 Bushfire evacuation concerns if more homes added. 156.3 Supports retaining country feel with larger blocks.	156.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 156.2 Issue 4 - Bushfire Safety Concerns 156.3 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
157.	Landowner	object	157.1 Built form impacts including: 2 storeys buildings will impact the current landscape, impact privacy and overlooking my home and no requirements regarding appearance and materials. 157.2 Impacts on air quality/pollution or smells, and overall land degradation from development. 157.3 Concern regarding Traffic Impact Assessment (TIA) data including COVID 19 and Denney Avenue level crossing. 157.4 TIA does not include proposals for road upgrades. 157.5 TIA makes reference to proposed school which will increase traffic which is not considered. 157.6 Concern regarding limited parking including lack of detail on visitor parking being provided in roads. 157.7 Concerns regarding construction impacts i.e. vehicles, large plant equipment, earthmovers, cranes etc. 157.8 Concerns regarding erosion, earth movement/subsidence, impacting surrounding properties, as well insufficient attention to the impact of acid and sulphate soils. 157.9 Increase prevalence of mosquitos and midges, and associated pathogens from development. 157.10 Impact on local fauna habitats, eg Black Cockatoos and other fauna who utilise the area as a movement corridor. 157.11 Consultation should be sought from Aboriginal groups. 157.12 Concern regarding adequacy of utility services – water, power and sewer. 157.13 Concern regarding telecommunications coverage in bushfire situations. 157.14 Lack of information of how new dwellings will fit within the current landscape and planting of trees.	157.1 Issue 2 - Housing Density and Built Form Concerns 157.2 Issue 1 - Environment Impact Concerns 157.3 Issue 7 -Traffic and Trasport Infrastructure Concerns & heading 157.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 157.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 157.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 157.7 Issue 1 - Environment Impact Concerns 157.8 Issue 1 - Environment Impact Concerns 157.9 Not supported, the matter would be addressed in a revised Midge and Mosquito Management Plan acceptable to the City. 157.10 Issue 1 - Environment Impact Concerns 157.11 Issue 8 - Heritage Concerns 157.12 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 157.13 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 157.14 Issue 2 - Housing Density and Built Form Concerns
158.	Landowner	object	158.1 Concern regarding increase in traffic and capacity of roads. 158.2 More cars will cause pollution in a valley area and pedestrian traffic will decrease. 158.3 Concern regarding tall buildings. 158.4 Concern regarding loss of vegetation.	158.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 158.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 158.3 Issue 2 - Housing Density and Built Form Concerns 158.4 Issue 1 - Environment Impact Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
159.	Landowner	object	159.1 Negative affect on local shops and amenities. The schools cannot and wont handle such a large influx. 159.2 The schools cannot and wont handle such a large influx. 159.3 Worsen speeding on Connell Ave. 159.4 Environmental impact the river will have with rubbish and added pollution. 159.5 increase in theft and break ins.	159.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 159.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 159.3 Not supported, there is no evidence/information provided that the development will cause speeds to increase on Connell Ave. 159.4 Issue 1 - Environment Impact Concerns 159.5 Issue 5 - Social Impact Concerns
160.	Landowner	object	160.1 It would affect our peace and serenity, why we bought here. 160.2 Concerned about safety with new residents.	160.1 Issue 6 - Change/loss of Character and Visual Amenity 160.2 Issue 5 - Social Impact Concerns
161.	Landowner	object	161.1 I do not support this proposed structure plan.	161.1 Noted
162.	Landowner	object	162.1 Objection to the High Density 162.2 Clifton Hills Primary School and Kelmscott Primary School are at their limit for the number of pupils parking for parents picking up and dropping off students for school is limited and dangerous. 162.3 Armadale Hospital parking is also limited won't be able to cope with more patients. 162.4 The corner of Brookside Ave and Clifton St is a dangerous corner. 162.5 The addition of 3 storey buildings close to the Canning River will cause some problems for the wildlife. 162.6 Concern with access via Gilwell Ave to the Highway in the case of bushfire as was the case in 2011. With more people/cars in the area evacuation will be more difficult. 162.7 Units for elderly people in the area wishing to downsize would be a better option.	162.1 Issue 2 - Housing Density and Built Form Concerns 162.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 162.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 162.4 Issue 7 -Traffic and Transport Infrastructure Concerns 162.5 Issue 1 - Environment Impact Concerns 162.6 Issue 4 - Bushfire Safety Concerns 162.7 Supported, medium densities proposed can provide downsizing options.
163.	Landowner	object	163.1 Concern regarding environment damage to the area. 163.2 This area is not the right area for this sort of housing. 163.3 It will be awful for the school traffic.	163.1 Issue 1 - Environment Impact Concerns 163.2 Issue 2 - Housing Density and Built Form Concerns 163.3 Issue 7 -Traffic and Transport Infrastructure Concerns
164.	Landowner	object	164.1 No comments provided.	164.1 Noted.
165.	Landowner	object	165.1 Concern regarding environment damage to the area. 165.2 Proposed housing not suited to area. 165.2 Increase in school traffic.	165.1 Issue 1 - Environment Impact Concerns 165.2 Issue 2 - Housing Density and Built Form Concerns 165.3 Issue 7 -Traffic and Transport Infrastructure Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
166.	Landowner	Comment	166.1 Concerns regarding the density and proposed height of dwellings. A maximum height of buildings along Brookton Avenue should be set at 2 stories in line with Clifton Street. 166.2 Concern no maximum height for R80 development. 166.3 Population increase will put pressure on social amenities. 166.4 Concerns regarding increase in traffic on Clifton Street.	166.1 Issue 2 - Housing Density and Built Form Concerns 166.2 Issue 2 - Housing Density and Built Form Concerns 166.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 166.4 Issue 7 -Traffic and Trasport Infrastructure Concerns
167.	Landowner	object	167.1 Proposed density is inconsistent with R-Code on east side of Clifton Street. 167.2 High density could set a precedent for same residential developments along much of this section of the Canning River. 167.3 Trees will be removed to accommodate the high-density development. 167.4 Clifton St and Brookside Ave are one lane streets combine with construction traffic along with local traffic would cause congestion problems for the locals who use these roads, including emergency services. 167.5 Concern urban stormwater run-off form development will pollute the river with oil, fuel, fertilisers and herbicide. 167.6 Bushfire evacuation concerns due to one exit to Albany Hwy. 167.7 High density development will endanger river marine life and bird life in the area.	167.1 Issue 2 - Housing Density and Built Form Concerns 167.2 Issue 10 – Other Concerns 167.3 Issue 1 - Environment Impact Concerns & Report heading Natural Environment & Trees 167.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 167.5 Issue 1 - Environment Impact Concerns 167.6 Issue 4 - Bushfire Safety Concerns 167.7 Issue 1 - Environment Impact Concerns
168.	Landowner	comment	168.1 Proposed housing will change to areas character including loss of river and trees. 168.2 Loss of community feel.	168.1 Issue 6 - Change/loss of Character and Visual Amenity & Issue 1 - Environment Impact Concerns 168.2 Issue 6 - Change/loss of Character and Visual Amenity
169.	Landowner	object	169.1 3 Storeys not in keeping with existing housing. 169.2 Development will increase traffic and noise. 169.3 Clifton Hills Primary School is too small for extra students. 169.4 Increased traffic on Clifton St nad bushfire evacuation concerns. 169.5 Concern regarding building works impacting river. 169.6 Density is too high.	169.1 Issue 2 - Housing Density and Built Form Concerns 169.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 169.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 169.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 169.5 Issue 1 - Environment Impact Concerns 169.6 Issue 2 - Housing Density and Built Form Concerns
170.	Landowner	object	170.1 Concern regarding impact to existing community.	170.1 Issue 6 - Change/loss of Character and Visual Amenity & Issue 5 - Social Impact Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
171.	Landowner	object	171.1 Concern regarding wind borne material and runoff to the river during construction phase. 171.2 Proposed density of the estate is not at all fitting with the existing housing in Kelmscott. 171.3 Proposed housing density leads to an increase in ambient temperature and contribute to climate change.	171.1 Issue 1 - Environment Impact Concerns 171.2 Issue 2 - Housing Density and Built Form Concerns 171.3 Not supported,
172.	Landowner	object	172.1 Concern regarding impact to land nature and waterways. 172.2 Concern regarding increase traffic and access to and from Albany Highway. 172.3 Local school can't accommodate more student and education standards will drop. 172.4 Increase in crime and dumping of rubbish in bush.	172.1 Issue 1 - Environment Impact Concerns 172.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 172.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 172.4 Social Impact Concerns
173.	Landowner	object	173.1 Lack of social infrastructure in the area. 173.2 Concern regarding increase in crime i.e. vandalism. 173.3 Concern regarding impact to exist community.	173.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 171.2 Issue 5 - Social Impact Concerns 171.3 Issue 6 - Change/loss of Character and Visual Amenity & Issue 5 - Social Impact Concerns
174.	Landowner	object	174.1 Development will set a precedent for further development along the river. 174.2 Will impact to river ecosystem plants and animals. 174.3 Heat Island effect. 174.4 Loss of trees and canopy cover. 174.5 Construction would create runoff during the building process and damage river. 174.6 Clifton Street would be become congested. 174.7 Traffic safety due to poor visibility at Brookside intersection. 174.8 Car parking concerns due to development. 174.9 Development would result in major change to the area and the liveability ratings and not in keeping with reason people live here.	174.1 Issue 10 – Other Concerns 174.2 Issue 1 - Environment Impact Concerns 174.3 Issue 1 - Environment Impact Concerns 174.4 Issue 1 - Environment Impact Concerns & refer to Report heading Natural Environment & Trees 174.5 Issue 1 - Environment Impact Concerns & refer to Report heading Natural Environment & Trees 174.6 Issue 1 - Environment Impact Concerns 174.7 Issue 7 -Traffic and Trasport Infrastructure Concerns 174.8 Issue 7 -Traffic and Trasport Infrastructure Concerns 174.9 Issue 7 -Traffic and Trasport Infrastructure Concerns 174.10 Issue 6 - Change/loss of Character and Visual Amenity
175.	Landowner	object	175.1 Concern regarding runoff/pollution impact to river and downstream. 175.2 Development will constrain social and commercial services – schools, retail. 175.3 Don't support high density.	175.1 Issue 1 - Environment Impact Concerns 175.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 175.3 Issue 2 - Housing Density and Built Form Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
176.	Landowner	object	176.1 R40 interface is not in keeping to existing housing density and style and will reduce natural light. 176.2 Density not in keeping with character – bushland. 176.3 R40 density should be serviced with laneways to reduce garage and access impacts to Clifton Street. 176.4 Density is too high for location. 176.5 Proposed POS is encumbered by Bush Forever. 176.6 Concern regarding financial viability of development. 176.7 Clifton Street is not wide enough for additional traffic. 176.8 Concern regarding driveway access to Clifton Street due to increase traffic. 176.9 Pedestrian safety concerns especially associated with school and crossing of Clifton Street and no footpath of the development side of Clifton Street. 176.10 Concern regarding Gilwell/Page Rd intersection being insufficient and creating a traffic hazard. 176.11 Brookside/Clifton to Connell Ave traffic management which has not been mentioned in the proposal. 176.12 Connell Avenue issues speeding, accidents. 176.13 Development will cause roadkill. 176.14 Traffic safety concerns at intersection of Turner Road by cars speeding down the hill at blind corner. 176.15 Local schools are already at capacity no room for more students and walkability concerns. 176.16 There is a lack of medical/doctor in the area. 176.17 Kelmscott shopping centres car parks are inadequate and not walkable from the development. 176.18 Proposal is greater than 800 metres walking distance to train station and therefore does not meet the criteria for high density development. 176.19 Future residents will need to drive and there are inadequate parking bays at the train station. 176.20 Concern regarding lack of consultation and compliance with Aboriginal heritage. 176.21 Lack of detail on litter management and concern regarding litter impact to river. 176.22 Concern regarding impact to river from high density development. 176.23 Concern regarding loss of trees and impact to birdlife. 176.24 Proposal will impact our current lifestyle.	176.1 Issue 2 - Housing Density and Built Form Concerns 176.2 Issue 2 - Housing Density and Built Form Concerns 176.3 Issue 2 - Housing Density and Built Form Concerns 176.4 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 176.5 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 176.6 Noted. 176.7 Issue 7 -Traffic and Trasport Infrastructure Concerns 176.8 Not supported, driveway access to Clifton St will be maintained and Clifton St generally has good sight lines for reversing vehicle. 176.9 Issue 7 -Traffic and Trasport Infrastructure Concerns 176.10 Issue 7 -Traffic and Trasport Infrastructure Concerns 176.11 Issue 7 -Traffic and Trasport Infrastructure Concerns & Report heading Road Network and Traffic Management 176.12 Not supported, there is no evidence that speeding will increase on Connell Ave. 176.13 Supported, signage along the proposed POS interface road could be installed to alert drives to the potential for wildlife crossing roads. 176.14 Issue 7 -Traffic and Trasport Infrastructure Concerns 176.14 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 176.15 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 176.16 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 176.17 Issue 2 - Housing Density and Built Form Concerns 176.18 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 176.19 Issue 8 - Heritage Concerns 176.20 Issue 1 - Environment Impact Concerns 176.21 Issue 1 - Environment Impact Concerns 176.22 Issue 1 - Environment Impact Concerns 176.23 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
177.	Landowner	object	177.1 Concern regarding limited (2 access) street to Albany Hwy and increase in traffic congestion and accidents.	177.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
178.	Landowner	object	178.1 Concerns about the impact on the natural environment including trees and wildlife that currently exist along the Canning River. 178.2 Concern that stormwater entering the river may be a significant risk to the biodiversity and conservation of the river. 178.3 R60 & R80 dwelling are not in keeping the existing dwelling in the Clifton Hills/Kelmscott area. 178.4 Development will impact the natural beauty of the river and local area. 178.5 Additional dwellings along the river will set a precedent for further developments along the Canning River. 178.6 Increase in local traffic and impact to safety of children walking to school. 178.7 Lack of traffic management on Clifton Street. 178.8 Concern local school can't accommodate extra students from development. 178.9 Concern local medical facility can't accommodate extra population from development.	178.1 Issue 1 - Environment Impact Concerns & Report heading Natural Environment & Tree Retention 178.2 Issue 1 - Environment Impact Concerns 178.3 Issue 2 - Housing Density and Built Form Concerns 178.4 Issue 6 - Change/loss of Character and Visual Amenity 178.5 Issue 10 – Other Concerns 178.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 178.7 Issue 7 -Traffic and Trasport Infrastructure Concerns 178.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 178.9 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
179.	Landowner	object	179.1 Concern with overlooking from 2 and 3 storey houses. 179.2 Gilwell Ave won't be able to cope with traffic and noise. 179.3 Impacts to air and water quality. 179.4 Public School and hospital capacity concerns. 179.5 Bushfire safety concerns. 179.6 Proposals to near retirement units on Brookside.	179.1 Issue 2 - Housing Density and Built Form Concerns 179.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 179.3 Issue 1 - Environment Impact Concerns 179.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 179.5 Issue 4 - Bushfire Safety Concerns 179.6 Noted.
180.	Landowner	object	180.1 Concern regarding increase on traffic on Brookside Ave and Clifton St and road capacity to accommodate. 180.2 Concern regarding elderly pedestrians. 180.3 Impact to local wildlife. 180.4 More Crime.	180.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 180.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 180.3 Issue 1 - Environment Impact Concerns 180.4 Issue 5 - Social Impact Concerns
181.	Landowner	object	181.1 Refer to Submission 6.1 to 6.14 above.	181.1 Refer to Submission 6.1 to 6.14 above.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
182.	Landowner	object	182.1 Primary schools will loss green space for temporary classrooms because of increase in population. 182.2 Height, bulk and scale of the proposed buildings is not in keeping with the established homes. 182.3 Impact on the river, flora and inhabitants during construction due to habitat loss and run off. 182.4 The loss of large trees (habitat) and if replaced would take years to establish and are required to prevent riverbank erosion. 182.5 Bushfire evacuation concerns due to inadequate road infrastructure. 182.6 Amenity impacts due to increase noise and traffic 182.7 Roadkill increase. 182.8 Pedestrian safety concerns due to increase traffic and no proposed road or footpath upgrades. 182.9 Black spot at Clifton and Brookside Intersection. 182.10 Train station is greater than walking distance so residents will use cars.	182.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 182.2 Issue 2 - Housing Density and Built Form Concerns 182.3 Issue 1 - Environment Impact Concerns 182.4 Issue 1 - Environment Impact Concerns & refer to Report heading Natural Environment & Tree Retention 182.5 Issue 4 - Bushfire Safety Concerns 182.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 182.7 Supported, signage along the proposed POS interface road could be installed to alert drives to the potential for wildlife crossing roads. 182.8 Issue 7 -Traffic and Trasport Infrastructure Concerns 182.9 Issue 7 -Traffic and Trasport Infrastructure Concerns 182.10 Issue 2 - Housing Density and Built Form Concerns
183.	Landowner	object	183.1 Moved here for foothills living space not traffic jam packed streets. 183.2 Concern environmental impacting water/air pollution & land degradation, birdlife and wildlife. 183.3 Object to height, bulk & scale of future buildings and loss of privacy. 183.4 Concern regarding impact to streetscapes. 183.5 Not compatible with this development in foothills environment. 183.6 Concern regarding adequate public infrastructure includes health & safety. 183.7 Concern regarding increase in rubbish and personal safety.	183.1 Issue 6 - Change/loss of Character and Visual Amenity 183.2 Issue 1 - Environment Impact Concerns 183.3 Issue 2 - Housing Density and Built Form Concerns 183.4 Issue 2 - Housing Density and Built Form Concerns 183.5 Issue 6 - Change/loss of Character and Visual Amenity 183.6 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 183.7 Issue 5 - Social Impact Concerns
184.	Landowner	object	184.1 Refer to Submission 6.1 to 6.14 above.	184.1 Refer to Submission 6.1 to 6.14 above.
185.	Landowner	object	185.1 Density is too high. 185.2 Bushfire evacuation concerns due to limited escape route being Gilwell Ave as Connell Ave was blocked off. 185.3 Increase in traffic concerns. 185.4 Parking concerns due to more cars especially around the school. 185.5 Impact to streetscape of 2 storey buildings with minimal setbacks. 185.6 Concern regarding additional run off and pollution into the river. 185.7 Concern regarding impacts of construction site works. 185.8 Concern regarding precedent for further development.	185.1 Issue 2 - Housing Density and Built Form Concerns 185.2 Issue 4 - Bushfire Safety Concerns 185.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 185.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 185.5 Issue 2 - Housing Density and Built Form Concerns 185.6 Issue 1 - Environment Impact Concerns 185.7 Issue 1 - Environment Impact Concerns 185.8 Issue 10 – Other Concerns
186.	Landowner	object	186.1 We object as of many reasons.	186.1 Noted

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
187.	Landowner	object	187.1 No.	187.1 Noted
188.	Landowner	object	186.1 Concern regarding contaminates entering the river and impacting aquatic wildlife. 188.2 Concern with maintain water flow to the river. 188.3 Concern regarding aboriginal heritage and consultation.	188.1 Issue 1 - Environment Impact Concerns 188.2 Issue 1 - Environment Impact Concerns 188.3 Issue 8 - Heritage Concerns
189.	Landowner	object	189.1 Concerned about risk of bushfires with so many homes/people in such a small area very with limited ways out of the area will be dangerous. 189.2 Concern regarding impact of traffic, noise and smell and land degradation to birds and animals in Canning River.	189.1 Issue 4 - Bushfire Safety Concerns 189.2 Issue 7 -Traffic and Trasport Infrastructure Concerns & Issue 1 - Environment Impact Concerns
190.	Landowner	comment	190.1 Increase traffic and noise will impact our area. 190.2 More trees should be planted along the river.	190.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 190.2 Supported, refer to report heading Natural Environment & Tree Retention.
191.	Landowner	object	191.1 Increase in traffic will threaten both motorists and pedestrians, particularly schoolchildren and the elderly particularly Clifton St and Gilwell Ave. 191.2 Density and height of the proposal is excessive for the area and is not used elsewhere in the City of Armadale. 191.3 Run-off with contaminants will enter the river and be detrimental to fauna and native flora. 191.4 Bushfire evacuation concerns due to roads become gridlocked like 2011 bushfires. Brooks side pedestrian bridge should be upgrade to traffic bridge. 191.5 Area is not suited to high density as trains station is 20 minute of foot, too far.	191.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 191.2 Issue 2 - Housing Density and Built Form Concerns 191.3 Issue 1 - Environment Impact Concerns 191.4 Issue 4 - Bushfire Safety Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 191.5 Issue 2 - Housing Density and Built Form Concerns
192.	Landowner	object	192.1 Should be built in Byford.	192.1 Noted

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
193.	Landowner	object	193.1 Lack of consultation with Aboriginal Land and Sea Council. 193.2 Areas walking distance to train station is understated should be approximately 1.3km. 193.3 Traffic survey data of 2017 is outdated. 193.4 Concerns regarding bushfire evacuated during the bushfires in 2011 and it took 45 minutes to get to a safe area the other side of the Canning River via Gilwell Avenue. Connell Avenue was closed in 2011 due to fire. There is no plan or proposal is Structure Plan for any new bridges to alleviate this problem. 193.5 Proposed verges are too narrow for large tree/canopy cover and will lead to heat island effect. 193.6 Concerned regarding Clifton streetscape due to 2 storey development in comparison to existing residential on opposite side. Single storey is more in keeping.	193.1 Issue 8 - Heritage Concerns 193.2 Issue 2 - Housing Density and Built Form Concerns 193.3 Issue 7 -Traffic and Transport Infrastructure Concerns & refer to heading 193.4 Issue 4 - Bushfire Safety Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 193.5 Issue 2 - Housing Density and Built Form Concerns 193.6 Issue 2 - Housing Density and Built Form Concerns
194.	Landowner	object	194.1 Will have detrimental effects on the surrounding area, the native flora and fauna is already being encroached on, the wildlife in the area is already being forced out and killed daily on our roads. 194.2 Development should be confined to two road frontages.	194.1 Issue 1 - Environment Impact Concerns and regarding roadkill, signage along the proposed POS interface road could be installed to alert drivers to the potential for wildlife crossing roads. 194.2 Not supported, the Urban Development zone extend to the proposed river foreshore reserve so may be considered for urban development.
195.	Landowner	comment	195.1 Object to the height and density of the proposed dwellings which should be less. 195.2 Main concern is the health of the river, a bush corridor for wildlife, land degradation and removal of old jarrah, Marri trees along with bush destroys homes for our wildlife. Endangered Black Cockatoos, Brushtail Possums, quendas, lizards, birds require.	195.1 Issue 2 - Housing Density and Built Form Concerns 195.2 Issue 1 - Environment Impact Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
196.	Landowner	object	196.1 Proposed high-density will create traffic problems as access to the town centre will be almost entirely over Gilwell Avenue. 196.2 The 400 new dwellings on just 3.6 ha has no room for garages, thus many vehicles will park on the streets, thus restricting access and traffic. 196.3 Proposed dwellings have no compatibility with existing housing in the area. 196.4 Rubbish collection of the 800 new bins required in the precinct would be a problem. 196.5 Small house have no gardens for children and the river may be dangerous for play. 196.6 Will cause flies to breed. 196.7 Will damage the most vulnerable section and only natural aquatic walk in Kelmscott. 196.8 Would also set a precedent in areas north and south of this site in the future for similar development.	196.1 Issue 2 - Housing Density and Built Form Concerns 196.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 196.3 Issue 2 - Housing Density and Built Form Concerns 196.4 Not supported, there are areas with similar densities in the metropolitan area where waste service operates effectively. The concern can be addressed at subdivision and/or development application stage. 196.5 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 196.6 Not supported, the assertion is not supported with information/rationale. 196.7 Issue 1 - Environment Impact Concerns 196.8 Issue 10 – Other Concerns
197.	Landowner	comment	197.1 City of Armadale is for “Country Style Living”. - peaceful and quiet environment. 197.2 Access concerns limited to Gilwell Avenue with poor sight lines. 197.3 River needs protection as a linear park. 197.4 Clifton St has footpaths and roundabouts enjoyed by residents. 197.5 Concern regarding Clifton St Brookside Ave intersection. 197.6 New traffic bridge required over the river but creates traffic problems 197.7 Kelmscott is poor served by main sewer.	197.1 Issue 6 - Change/loss of Character and Visual Amenity 197.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 197.3 Issue 1 - Environment Impact Concerns 197.4 Noted. 197.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 197.6 Issue 7 -Traffic and Trasport Infrastructure Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 197.7 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
198.	Landowner	object	198.1 Development is too dense, town houses are not in character with neighbouring houses only single storey with gardens family homes. 198.2 Will impact semi-rural character of area. 198.3 Local roads would not support the extra traffic and only three exit points to the Albany Highway. 198.4 A traffic bridge at Brookside Ave and Turner Pl is required. 198.5 Local school can't cope with extra students. 198.6 Parking concerns due to high density. 198.7 Groundwater contamination concerns. 198.8 Foreshore management plan required to control erosion and sediment. 198.9 Construction impacts – noise, dust stock piling and complaints management required. 198.10 Buildings to address bushfire safety. 198.11 Concern regarding urban stormwater contamination of river.	198.1 Issue 2 - Housing Density and Built Form Concerns 198.2 Issue 6 - Change/loss of Character and Visual Amenity 198.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 198.4 Supported, The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 198.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 198.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 198.7 Not supported, residential is not considered land use with a high capacity for contamination and likely less than rural or industrial land uses. 198.8 Supported, refer to report heading Foreshore & Public Open Space Provision 198.9 Issue 1 - Environment Impact Concerns 198.10 Supported, the matter can e dealt with at development stage. 198.11 Issue 1 - Environment Impact Concerns
199.	Landowner	comment	199.1 Concerned regarding high density 2-3 storey building height and scale and loss of privacy. 199.2 Concern regarding increase in noise and crime in area especially as a retirement village is close by. 199.3 Concern regarding air and water pollution, land degradation and impact all native wildlife in the affected area. The river will be affected dust and most likely building materials.	199.1 Issue 2 - Housing Density and Built Form Concerns 199.2 Issue 5 - Social Impact Concerns 199.3 Issue 1 - Environment Impact Concerns
200.	interest group	object	200.1 Concerned that sand fill during and after construction will have a major impact on river habitat and inability of the City to ensure compliance with sediment management plans. 200.2 Conservation Category Wetland (CCW) should have a 50m buffer. 200.3 No foreshore management plan has been prepared for the proposal. 200.4 Stormwater detention basins in the CCW buffer is an issue. 200.5 High density and its impermeable surfaces will increase urban runoff carrying pollutants, sediment and refuse into the river.	200.1 Issue 1 - Environment Impact Concerns 200.2 Issue 1 - Environment Impact Concerns 200.3 Supported, refer to report heading Foreshore & Public Open Space Provision 200.4 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 200.5 Issue 1 - Environment Impact Concerns
201.	Landowner	object	201.1 Refer to Submission 47.1 to 47.12 above.	201.1 Refer to Submission 47.1 to 47.12 above.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
202.	Landowner	comment	202.1 Will increase the traffic during peak times so what will be done to cater for that. 202.2 Recent Denny Ave changes increase traffic greatly for a period of time with detours and made it difficult to exit my driveway. 202.3 Regarding views/outlook perspective it would be more pleasing to local residents and visitors walking/picnicking by the river looking back on a 3 to 4 storey apartment complex or on town houses/villas with a nice garden. 202.4 Concern regarding loss of country/community feel.	202.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 202.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 202.3 Issue 6 - Change/loss of Character and Visual Amenity 202.4 Issue 6 - Change/loss of Character and Visual Amenity
203.	Landowner	object	203.1 Object to R40 and R80 zoning. 203.2 The flora and fauna surrounding the Canning River would be greatly affected by the construction the finals structures. 203.3 Concern regarding overcrowding and increases in crime and litter. 203.4 Development here would only divide the existing community.	203.1 Issue 2 - Housing Density and Built Form Concerns 203.2 Issue 1 - Environment Impact Concerns 203.3 Issue 2 - Housing Density and Built Form Concerns & Issue 5 - Social Impact Concerns 203.4 Issue 5 - Social Impact Concerns
204.	Landowner	comment	204.1 Concerns about the height of the proposed buildings as they could look out straight over my fence into my backyard. 204.2 Trees to be remove will reduce windbreak. 204.3 Concern regarding pedestrian safely due to increase traffic on Clifton Street. 204.4 There will also be an increase in unwanted noise in a quiet neighbourhood.	204.1 Issue 2 - Housing Density and Built Form Concerns 204.2 Not supported, wind impacts are not required to be addressed in the WAPC's Guidance for Structure Plans, August 2023. 204.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 204.4 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
205.	Landowner	object	205.1 Increase traffic concerns due to limited 3 exits points out of this area another one at Turner Place/Brookside Ave needs to be upgraded for vehicle traffic. 205.2 Clifton Hills Primary School backs up on Clifton Street at school pickup/drop off times and there not enough parking. 205.3 It is dangerous to cross the roads as there are no traffic wardens to direct and assist for safety reasons. 205.4 Bushfire evacuation safely concerns due to limited exit and 2 got blocked off during 2011 bushfire. 205.5 Environment impact concerns to surrounding bush and wildlife. 205.6 Developer should pay for infrastructure, not rate payers of Clifton Hills. 205.7 Concern increase traffic will make getting in and out of their own driveways. 205.8 The residents who live across from development bought when it was peace and quiet. They need to be compensated by the developers for the noise and disruption and decreased value of their own properties. 205.9 Too many people in a small area will impact their quality of life and the river surrounding them. 205.10 Development of Canning River Clifton Street (south) Structure Plan area will worsen traffic.	205.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 205.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 205.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 205.4 Issue 4 - Bushfire Safety Concerns 205.5 Issue 1 - Environment Impact Concerns 205.6 Issue 10 – Other Concerns 205.7 Not supported, the City would consider traffic calming on Clifton Street if need be so vehicles egressing abutting properties would be safer. 205.8 Issue 6 - Change/loss of Character and Visual Amenity 205.9 Issue 2 - Housing Density and Built Form Concerns 205.10 Issue 7 -Traffic and Trasport Infrastructure Concerns
206.	Landowner	object	206.1 Bushfire evacuation concerns due to lack of escape routes and Turner Pl/Brookside Ave bridge is inadequate for future residents. 206.2 Speeding around the blind corner of Brookside Ave and Clifton St. 206.3 Sand and silt will flow into river during construction and damage river and fauna.	206.1 Issue 4 - Bushfire Safety Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 206.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 206.3 Issue 1 - Environment Impact Concerns
207.	Landowner	object	207.1 Refer to Submission 6.1 to 6.14 above.	207.1 Refer to Submission 6.1 to 6.14 above.
208.	Landowner	object	208.1 The land is currently zoned R15/40 and it has been proposed that the zoning be changed to R40 to R80 in an area which has limited access and no services. 208.2 River is in danger of being polluted. 208.3 Concerned ratepayers have to pay the bill when the water level rises (the site is at the bottom of a steep hill) and the new buildings are flooded. 208.4 Concern regarding consultation with traditional owners. 208.5 Concern regarding increase in traffic from development and limited access in and out or area. 208.6 Bushfire evacuation concerns due to limited access.	208.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns & Issue 7 -Traffic and Trasport Infrastructure Concerns 208.2 Issue 1 - Environment Impact Concerns 208.3 Issue 10 – Other Concerns 208.4 Issue 8 - Heritage Concerns 208.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 208.6 Issue 4 - Bushfire Safety Concerns

209.	Landowner	object	209.1 Public consultation time was insufficient. 209.2 Density is too high and 2 storey development is not in keep with the area. 209.3 Clifton Hills Primary School is already at capacity using demountable classrooms and additional students will make matters worse. 209.4 There is no direct bus route to Kelmscott Senior High School to service area. 209.5 Concern regarding how servicing and provision of POS/foreshore reserve will be coordinated. 209.6 POS is insufficient. 209.7 Concern regarding retirement village impact to estimated population. 209.8 Housing infill should be direct to established areas (east Kelmscott) 209.9 Density exceed Directions 2031 objective/target of 15 dwellings per hectare. 209.10 Proposal does not adequately discuss requirements of PLN 2.6 Water Sensitive Design. 209.11 Proposal does not detail contributions, new facilities, infrastructure and service provision as indicated in the City's LPS 2016 Housing Strategy. 209.12 Development would result in loss of trees outside POS/foreshore. 209.13 No POS is allocated within residential area. 209.14 Bush Forever should be rehabilitated. 209.15 Proposal does not address Swan and Canning River Management Act 2006 209.16 Concern regarding adequacy of service (utilities) to meet demand of development. 209.17 Pedestrian safety concerns due to poor lighting especially nearby river bridges and not proposed improvement/contribution in proposal. 209.18 The proposal is greater than 800 metres walking distance to train station. 209.19 Transport Impact Assessment (TIA) data of 2017 is out of date. 209.20 Proposal does not consider temporary closure of Armadale train line. 209.21 Concern proposals will lead to erosion of the foreshore due to urban water runoff. 209.22 Lack of detail regarding Aboriginal heritage consultation. 209.23 Proposal does not create local employment. 209.24 Various statements in the structure plan report stating the proposal meets objectives requirements of various state planning frameworks are opinion and not supported by evidence. 209.25 Various errors in Structure Plan report and technical studies including spelling, dwelling yield, property description, page numbering, inconsistent terminology and other errors and inconsistencies.	209.1 Not supported, the public consultation period was a minimum 42 days in accordance with planning legislation. 209.2 Issue 2 - Housing Density and Built Form Concerns 209.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 209.4 Noted, High School student have other travel options including drop-off by parents and cycling, 209.5 Supported, the coordination would be resolved at subdivision stage. 209.6 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 209.7 Supported in part, the Applicant decided to remove the retirement village use from the structure plan but could be considered under a development application subject to appropriate technical studies including a bushfire management plan. 209.8 Not supported, the area is zoned for Urban development and can be developed for housing subject to planning/development approvals. 209.9 Issue 2 - Housing Density and Built Form Concerns 209.10 Supported, the City recommends further detail on how the Proposal including LWMS achieves the requirements of PLN 2.6 in the City's Schedule of Issue and Modifications attached to the Agenda Report. 209.11 Not supported, a structure plan of scale proposed need only provide appropriate POS. 209.12 Issue 1 - Environment Impact Concerns & Report heading Natural Environment & Tree Retention 209.13 Not supported, the most suitable land for POS is adjacent to the proposed Canning River foreshore reserve. 209.14 Supported, a landscape plan and foreshore management plan acceptable to the City can provide for rehabilitation of the Bush Forever land. 209.15 Not supported, the proposed structure plan has been referred to the DBCA - Conservation and Ecosystem Management Division Rivers and Estuaries Branch for comments. Refer to Agenda Report heading State Government Agencies' Submissions. 209.16 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 209.17 Supported, lighting of the proposed POS can be addressed in a landscape plan at subdivision stage. 209.18 Issue 2 - Housing Density and Built Form Concerns
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SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
				209.19 Supported, refer to Agenda Report heading Road Network and Traffic Management 209.20 Not supported, the train line is schedule to be reopened in October 2025 long before the Structure Plan area could be developed. 209.21 Issue 1 - Environment Impact Concerns 209.22 Issue 8 - Heritage Concerns 209.23 Not supported, the construction phase would result in some demand for local goods and services and future development would also increase demand for local goods and services a driver for local employment. 209.24 Supported in part, the City recommends further detail on how the proposal meets various State and local planning policies in the City's Schedule of Issue and Modifications attached to the Agenda Report. 209.25 Supported, the City recommends various correction to the Structure Plan report and technical studies.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
210.	Landowner	object	210.1 Local schools are already at capacity no more room for extra students. 210.2 Bushfire evacuation concerns due to limited routes in and out of the locality. 210.3 Increased traffic and congestion on Clifton Street. 210.4 Intersection Clifton St and Brookside Avenue is hazardous. 210.5 Pedestrian safety concerns on Clifton St due to lack of footpaths. 210.6 Construction impact concerns – noise and operating hours. 210.7 Risk to current quality of lifestyle.	210.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 210.2 Issue 4 - Bushfire Safety Concerns 210.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 210.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 210.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 210.6 Issue 1 - Environment Impact Concerns 210.7 Issue 6 - Change/loss of Character and Visual Amenity

211.	Landowner	object	211.1 Height, bulk, scale or appearance of future buildings in comparison to single storey houses on the east side of Clifton Street. 211.2 Proposed density exceeds by more than 4 times Sub-Regional Planning Framework 25 dwellings per residential site hectare. 211.3 Impacts to streetscapes (i.e. blank wall to Clifton Street). 211.4 Impact to adjoining properties privacy and overlooking. 211.5 Loss of quality of lifestyle of the area the reason current residents chose to live here. 211.6 Loss of mature trees and canopy cover resulting in urban heat island effect. 211.7 Construction impacts – noise, smell, light and dust especially for residents on Clifton St. 211.8 Increase traffic volume on local roads and queuing times at intersections. 211.9 The safety of motorists and pedestrians, particularly school children and the elderly will be at greater risk. 211.10 Transport Impact Assessment (TIA) 2017 data is out of date and should model traffic from school pick-up and drop-off times. 211.11 Emergency vehicle access associated with evacuation needs to be considered. 211.12 Adequacy of Gilwell Rd bridge and a new traffic bridge at Brookside/Turner Pl needed. 211.13 Lack of Aboriginal Heritage report. 211.14 Proposal is greater than 800m walking distance to train station and therefore does meet criteria of DCP 1.6 for higher density development. 211.15 The area is in the Canning River flood plain and subject to flooding. 211.16 Bushfire evacuation concerns due to traffic jam made worse by increase residents. 211.17 Development will set an undesirable precedent for further development along the river with environmental impacts. 211.18 Ecological impact to river from increase urban runoff. 211.19 Construction impacts of fill entering river and impact to aquatic life. 211.20 The river should be allocated a 50m buffer zone on either side. 211.21 Concern regarding basins in Bush Forever/POS. 211.22 Inconsistency of DUP location in Structure Plan Maps. 211.23 Concern that environmental report concluded that there was no suitable habitat for ground dwelling fauna species. A proper fauna assessment is required. 211.24 Concern regarding narrow street widths suitability for rubbish truck manoeuvring. 211.25 Roundabout at Clifton/Tara Wy needed for traffic safety and evacuation. 211.26 Expansion of hospitals and more GPs required for new residents.	211.1 Issue 2 - Housing Density and Built Form Concerns 211.2 Issue 2 - Housing Density and Built Form Concerns 211.3 Not supported, development fronting Clifton St would be serviced by laneways. 211.4 Issue 2 - Housing Density and Built Form Concerns 211.5 Issue 6 - Change/loss of Character and Visual Amenity 211.6 Issue 1 - Environment Impact Concerns 211.7 Issue 1 - Environment Impact Concerns 211.8 Issue 7 -Traffic and Transport Infrastructure Concerns 211.9 Issue 7 -Traffic and Transport Infrastructure Concerns 211.10 Supported, refer to Agenda Report heading Road Network and Traffic Management 211.11 Not supported, the Department of Fire and Emergency Services was consulted and did not raise concerns regarding emergency vehicle access. 211.12 Issue 7 -Traffic and Transport Infrastructure Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave. 211.13 Issue 8 - Heritage Concerns 211.14 Issue 2 - Housing Density and Built Form Concerns 211.15 Issue 1 - Environment Impact Concerns 211.16 Issue 4 - Bushfire Safety Concerns 211.17 Issue 10 – Other Concerns 211.18 Issue 1 - Environment Impact Concerns 211.19 Issue 1 - Environment Impact Concerns 211.20 Issue 1 - Environment Impact Concerns 211.21 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 211.22 Supported, the City recommend Structure Plan Maps be consistent across reports in the City's Schedule of Issues and Modifications in the Agenda Attachments. 211.23 Issue 1 - Environment Impact Concerns 211.24 Supported, at subdivision stage the City's waste services will be consulted to ensure adequate waste vehicle manoeuvring. 211.25 Issue 7 -Traffic and Transport Infrastructure Concerns 211.26 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns
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SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
212.	Landowner	object	212.1 Risk and damage to the river system, the quality of the water (pollution) from runoff and stabilization of the riverbanks. 212.2 Impacts to river flora and fauna downstream and in general. 212.3 Bushfire evacuation concerns due to limited access in and out of area.	212.1 Issue 1 - Environment Impact Concerns 212.2 Issue 1 - Environment Impact Concerns 212.3 Issue 4 - Bushfire Safety Concerns
213.	Landowner	support	213.1 With the rental and housing crisis we need more homes for people/families. 213.2 Will support locals schools, shops and deli.	213.1 Supported, development of the structure plan areas would increase housing stock in the locality including smaller housing options currently lacking. 213.2 Supported, structure plan development will increase local catchment population for existing local businesses.
214.	Landowner	object	214.1 Bushfire safety concerns. 214.2 Land degradation. 214.3 Privacy/overlooking concerns.	214.1 Issue 4 - Bushfire Safety Concerns 214.2 Not supported, the Environmental Review report concluded most of the land was already environmentally degraded. 214.3 Issue 2 - Housing Density and Built Form Concerns
215.	Landowner	object	215.1 A full public environmental assessment should be undertaken on the impacts to the soil, vegetation and river system from construction of this development and ongoing impacts from high density living (i.e. road run off, chemical weed control etc). 215.2 More than the required 10% public open/green space should be provided to embed the City as a nature hub in Perth. 215.3 Support contemporary medium density to mitigate impacts. 215.4 Support crime prevention through appropriate design. 215.5 Support further public consultation.	215.1 Issue 1 - Environment Impact Concerns 215.2 Not supported, the developer only need provide as much public open space as required under State Government planning policies. 215.3 Issue 2 - Housing Density and Built Form Concerns 215.4 Issue 5 - Social Impact Concerns 215.5 Supported in part, public consultation/advertising has been conducted in accordance with the Planning Regulations 2015. Submitters will be advised of the WAPC's determination on the Structure Plan.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
216.	Landowner	support	216.1 Close to local schools and can be accessed on foot. 216.2 Close shopping, medical and other commercial services which can be accessed by footbridge at Turner Pl/Brookside Ave reduce car dependency. 216.3 Proximity to bus and train transportation hubs. 216.4 Access to recreation along the river. 216.5 Preservation of river foreshore and bush Forever. 216.6 Zoning (R-Codes) provides housing options suitable for singles and couples and create a inclusive divers community. 216.7 This river and tree backdrop enhances the aesthetic appeal and contributes to a tranquil and harmonious living environment.	216.1 Supported, some shops and Clifton Hills Primary School are within 800m walking distance. 216.2 Supported, see 216.1 above 216.3 Supported in part, the City recommends R60 and R80 (high) density be removed and replaced with R40 (medium) density. The proximity of the train station still provides an opportunity for park or cycle and ride. 216.4 Supported, ceding of POS/Foreshore would provide public access, 216.5 Supported, the Bush Forever areas would be rehabilitated by the developer. 216.6 Supported, the City supports varied built form and home sizes to varying household types. 216.7 Supported, agreed.
217.	Landowner	object	217.1 Proposal does not include detail regarding any necessary infrastructure. When infrastructure is inadequate, mental health and social behaviours are impacted. 217.2 Concern regarding increase in traffic and adequacy of roads and no proposal for additional traffic bridge over the river i.e. Turner Pl/ Brookside Ave. 217.3 Structure Plan does not include proposal to improve pedestrian safety in the locality especially during peak hours and to amenity areas schools and shops. 217.4 Concern regarding capacity issues at local schools with more residents/pupils. 217.5 Concern regarding impact to bushland. 217.6 Concern regarding building height. 217.7 Concern regarding vehicle parking for residents. 217.8 Concern regarding landscaping in development. 217.9 Density of development is excessive.	217.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 217.2 Issue 7 -Traffic and Trasport Infrastructure Concerns. The City recommends the TIA address the need for a traffic bridge at Turner Pl / Brookside Ave.217.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 217.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 217.5 Issue 1 - Environment Impact Concerns 217.6 Issue 2 - Housing Density and Built Form Concerns 217.7 Issue 7 -Traffic and Trasport Infrastructure Concerns 217.8 Supported, the City will require the developer to prepare a landscape plan acceptable to the City. 217.9 Issue 2 - Housing Density and Built Form Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
218.	Landowner	object	218.1 Object to existing density of R15/40 changed to much higher density R40 to R80. 218.2 Concerns regarding impact to health of the Canning River, particularly if other properties similarly developed. 218.3 Concern regarding pit and pipe stormwater drainage and big basins in POS. More at source treatment to reduce basin size. 218.4 Concern regarding construction traffic, machinery, materials storage areas, parking and so on impact on the river ecosystem. 218.5 Bushfire evacuation concerns due to extra traffic from development and only three exists in and out of area. 218.6 High density no suited to area.	218.1 Issue 2 - Housing Density and Built Form Concerns 218.2 Issue 1 - Environment Impact Concerns 218.3 Supported, refer to Agenda Report heading Local Water Management Strategy for further comments. 218.4 Issue 1 - Environment Impact Concerns 218.5 Issue 4 - Bushfire Safety Concerns 218.6 Issue 2 - Housing Density and Built Form Concerns
219.	Landowner	support	219.1 Proximity to public transport within 800-metre radius of the train station and reduced car dependence. 219.2 Shops, local school parks (Frye Park) and amenities in walking distance. 219.3 Consistency with existing developments near train stations and shopping precincts, such as Cannington, blending seamlessly with the environment. 219.4 Improved access to river foreshore and Turner PI footbridge. 219.5 Increase housing diversity with high-density for smaller residences suitable for older residents or couples. 219.6 Will address housing shortage. 219.7 Improve bushfire safety. 219.8 Protection of river via urban water management (drainage). 219.9 Protection of river foreshore vegetation.	219.1 Supported in part, the proximity of the train station still provides an opportunity for park and cycle and ride. 219.2 Supported, some shops are within the 800m walking distance. 219.3 Not supported, there is no information provided on the location of the developments in Cannington. 219.4 Supported, the proposed interface road to the river will improve public access. 219.5 Supported, the development would assist in promoting housing diversity in the locality where single house current dominate. 219.6 Supported, the development in small can assist with the housing shortage. 219.7 Issue 4 - Bushfire Safety Concerns 219.8 Supported, an LWMS acceptable to the City could address urban water management. 219.9 Supported, ceding of the POS/Foreshore will protect and allow for rehabilitation of vegetation.

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
220.	Landowner	object	220.1 Loss of natural vegetation/ habitats for wildlife on the properties including the Canning River. 220.2 Destruction of environmentally significant flora and fauna. 220.3 Urban heat island effect would have detrimental effects to the natural environment and to the occupants of the dwellings. 220.4 Concerns regarding capacity of schools and hospitals with increase in population. 220.5 Bushfire evacuation concerns given limited exit points from the area. 220.6 Higher density leads to increase in crime. 220.7 Not compatible with current Clifton Hills area with most properties being more than 500m ² and single storey. 220.8 The unique Clifton Hills community and atmosphere would be altered.	220.1 Issue 1 - Environment Impact Concerns 220.2 Issue 1 - Environment Impact Concerns 220.3 Issue 1 - Environment Impact Concerns 220.4 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 220.5 Issue 4 - Bushfire Safety Concern 220.6 Issue 5 - Social Impact Concerns 220.7 Issue 2 - Housing Density and Built Form Concerns 220.8 Issue 6 - Change/loss of Character and Visual Amenity
221.	Landowner	support	221.1 Lack of sewer in the area means development will leach into soil and damage river and flora and fauna. 221.2 Concern regarding the capacity of the power grid. 221.3 Underground power will destabilise the soil and around the Canning River.	221.1 Not supported, the structure plan development would be required to be sewerred. 221.2 Not supported, upgrades to the power grid to service the structure plan development would be required. 221.3 Not supported, there is no evidence to support this claim.
222.	Landowner	object	222.1 Limited access to major road arteries will cause considerable congestion in what otherwise are quiet suburban roads. 222.2 Safety concerns for residents living on Clifton Street. 222.3 Adversely affect to the Canning River both during and after construction. 222.4 Concern regarding litter and oil on the river eco-system.	222.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 222.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 222.3 Issue 1 - Environment Impact Concerns 222.4 Issue 1 - Environment Impact Concerns

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NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
223.	Landowner	object	223.1 Density proposed would look out of place given existing density in the area. 223.2 The bulk and scale of the buildings due to the high-density unfriendly and unwelcoming atmosphere proposed on the river-side would overshadow the POS. 223.3 Basins would be a maintenance burden to the City. 223.4 Concern regarding visitor resident parking due to high density. 223.5 Concern regarding speeding on Clifton St and Brookside Ave especially corner of these roads and no traffic calming proposals in Structure Plan. 223.6 Development will increase traffic. 223.7 Concern regarding need to widen Gilwell Ave bridge. 223.8 Concerns regarding overcrowding of Clifton Hills Primary School. 223.9 Concerns regarding impact to Canning River. 223.10 Will undermine sense of community.	223.1 Issue 2 - Housing Density and Built Form Concerns 223.2 Issue 2 - Housing Density and Built Form Concerns 223.3 Supported, the number of basins in the POS is considered excessive. Refer to Agenda Report heading Local Water Management Strategy. 223.4 Issue 2 - Housing Density and Built Form Concerns 223.5 Issue 7 -Traffic and Transport Infrastructure Concerns 223.6 Issue 7 -Traffic and Transport Infrastructure Concerns 223.7 Issue 7 -Traffic and Transport Infrastructure Concerns 223.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 220.9 Issue 1 - Environment Impact Concerns 220.10 Issue 6 - Change/loss of Character and Visual Amenity and/or Issue 5 - Social Impact Concerns
224.	Landowner	object	224.1 R80 and R60 are too high a density for the land area as it is only 1/3 of the development area so further development at the same density would result in approximately 1000 dwelling and 2500 people based on ABS 2.6 persons per dwelling in the area. 224.2 Local infrastructure, roads and facilities were not designed to account for this volume of people above current numbers. 224.3 Traffic air borne pollution impact to Clifton Hills Primary School. 224.4 Increase in potential for accidents. 224.5 The bridge on Gilwell Avenue a natural choke point can become heavily congested. 224.6 Bushfire evacuation concerns due to increase in residents and limited access i.e. bushfires 2011. 224.7 Concern regarding impact to river due to polluted stormwater during the construction phase. 224.8 Concern regarding impact to river due to fertilizer to maintain proposed POS. 224.9 Development doesn't provide a 50m buffer in accordance with State Government policy. 224.10 Density should be reduced.	224.1 Issue 2 - Housing Density and Built Form Concerns 224.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 224.3 Issue 7 -Traffic and Transport Infrastructure Concerns, Issue 1 - Environment Impact Concerns and Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 224.4 Issue 7 -Traffic and Transport Infrastructure Concerns 224.5 Issue 7 -Traffic and Transport Infrastructure Concerns 224.6 Issue 4 - Bushfire Safety Concerns 224.7 Issue 1 - Environment Impact Concerns 224.8 Issue 1 - Environment Impact Concerns 224.9 Issue 1 - Environment Impact Concerns 224.10 Issue 2 - Housing Density and Built Form Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
225.	Landowner	object	225.1 Density of development premature as there are already plenty of land with infill capability. 225.2 Development is not in keeping with area character. 225.3 Bushfire evacuation concerns due to limited escape routes as occurred in 2011 bushfires. 225.4 High rise will create safety issues especially for elderly. 225.5 Land should be developed for a retirement village.	225.1 Issue 2 - Housing Density and Built Form Concerns 225.2 Issue 6 - Change/loss of Character and Visual Amenity 225.3 Issue 4 - Bushfire Safety Concerns 225.4 Not supported, there is no information provided that future development will not be safe for the elderly. 225.5 Noted. the applicant decided to remove the retirement village use from the structure plan but could be considered under a development application subject to appropriate technical studies including a bushfire management plan.
226.	Landowner	object	226.1 Proposal will cause habitat destruction and disrupt local wildlife. Protecting our natural environment and biodiversity should take high priority. 226.2 Proposal will increase traffic congestion and pose a safety risk. 226.3 Bushfire evacuation concerns due to additional traffic and limited escape routes Gilwell Ave and the other being Canning Mills Rd. 226.4 The quiet, peaceful environment that attracted residents to this area will be compromised. 226.5 Development will overwhelm schools, parks, healthcare facilities, and other essential services and services may decline. 226.6 Proposal will lead to overcrowding and increase in crime. 226.7 High-density will increased noise levels and pollution from construction activities. 226.8 Local schools are not equipped to handle the numbers of students. 226.9 Would alter the community's character and disrupt the sense of unity among its residents.	226.1 Issue 1 - Environment Impact Concerns 226.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 226.3 Issue 4 - Bushfire Safety Concerns 226.4 Issue 6 - Change/loss of Character and Visual Amenity 226.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 226.6 Issue 5 - Social Impact Concerns 226.7 Issue 1 - Environment Impact Concerns 226.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 226.9 Issue 6 - Change/loss of Character and Visual Amenity & Issue 5 - Social Impact Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
227.	Landowner	object	227.1 Increase traffic on Clifton St and Brookside Ave including excessive speed even with existing slow points. 227.2 Pedestrian safety concerns especially students making their way to and from school. 227.3 Increase parking problems including around the school at pick-up drop-off times. 227.4 Waste collection concerns. 227.5 Potential traffic accidents Clifton St and Tara Wy. 227.6 Concern regarding impact to local wildlife. 227.7 Bushfire evacuation concerns due to limited escape routes. 227.8 Railway Station is greater than 800m from structure plan area. 227.9 Development does not fit in with the existing landscape including larger owner occupier blocks of Clifton St/Brookside Ave. 227.10 Concern regarding adequacy of shops and parking to accommodate demand of more residents. 227.11 Concern regarding loss of privacy. 227.12 Concern regarding impact to river including erosion of riverbank and pollution. 227.13 Retirement village over 55s more fitting. 227.14 Concern regarding adequacy of schools to accommodate increase students.	227.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 227.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 227.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 227.4 Supported, at subdivision stage the City's waste services would be consulted to ensure adequate waste vehicle manoeuvring and verge area for bins. 227.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 227.6 Issue 1 - Environment Impact Concern 227.7 Issue 4 - Bushfire Safety Concerns 227.8 Issue 2 - Housing Density and Built Form Concerns 227.9 Issue 2 - Housing Density and Built Form Concerns 227.10 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 227.11 Issue 2 - Housing Density and Built Form Concerns 227.12 Issue 1 - Environment Impact Concerns 227.13 Noted, the applicant decided to remove the retirement village use from the structure plan but could be considered under a development application subject to appropriate technical studies including a bushfire management plan. 227.14 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
228.	Landowner	comment	228.1 Proposal doesn't meet the Transit Orientated Development requirements of DCP 1.6 Planning to Support Transit Use and Transit Oriented Development for higher density as area is excess of 1km walk to train station. 228.2 No mixed-use development with verandas/canopies along the walkable routes to train station for shade/pedestrian amenity. 228.3 Bus service in the locality are not high frequency. 228.4 This proposed Structure Plan is not in keeping with the natural river environment and low-density urban amenity of its surrounds. 228.5 Streetscaping and landscaping concerns of the development. 228.6 Local Development Plans and Design Guidelines would need to be prepared to ensure that development is consistent with the character and amenity of the local area. 228.7 Consultation is required to ensure that the community voice is taken into consideration in the process of determining of the LSP and in the development of future planning policies and guidelines for the development. 228.8 Upgrade to Gillan Drive is required for increased traffic flow. 228.9 Bushfire evacuation concerns/issues as occurred in 2011. 228.10 Concern regarding lack of commercial services to service increased population. 228.11 Concern regarding lack of on-street parking due to reliance on cars. 228.12 Landscaping is insufficient and will result in heat island effect. 228.13 Concern regarding impact to river from usage of proposed POS the use of board walks is recommended. 228.14 Dedicate children's playground required to prevent damage to river. 228.15 Concern regarding impact to turtles: a study is required. 228.16 Concern regarding loss of trees/Cockatoo habitat. 228.17 Concern regarding impact to Aboriginal heritage. 228.18 Proposal would set a precedent for further residential developments along the Canning River and require upgrades to local infrastructure – community facilities schools bridges over the Canning River. 228.19 Lack of doctors in the area.	228.1 Issue 2 - Housing Density and Built Form Concerns 228.2 Not supported, the development is proposed as residential and there in no requirement to provide canopies over the street. 228.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 228.4 Issue 6 - Change/loss of Character and Visual Amenity 228.5 Supported, a landscape plan acceptable to the City would be required at subdivision stage. 228.6 Issue 2 - Housing Density and Built Form Concerns 228.7 Supported, public consultation/advertising has been conducted in accordance with the Planning Regulations 2015. Submitters will be advised of the WAPC's determination on the Structure Plan. Advertising of planning instruments i.e. local development plans associate with the structure plan/future subdivision will be considered at the time of lodgement. 228.8 Issue 7 -Traffic and Trasport Infrastructure Concerns 228.9 Issue 4 - Bushfire Safety Concerns 228.10 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 228.11 Issue 7 -Traffic and Trasport Infrastructure Concerns 228.12 Issue 1 - Environment Impact Concerns 228.13 Issue 1 - Environment Impact Concerns 228.14 Supported, the City recommends a pocket park 228.15 Issue 1 - Environment Impact Concerns 228.16 Issue 1 - Environment Impact Concerns & Agenda Report heading Natural Environment and Trees. 228.17 Issue 8 - Heritage Concerns 228.18 Issue 10 – Other Concerns 228.19 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
229.	Landowner	object	229.1 Public review period inadequate. 229.2 Bushfire risk concerns for new and existing residents. 229.3 Concern regarding adequacy of public utilities – sewer, water, power, gas telecommunications. 229.4 Risk to wetlands and "bush forever" areas - high density development and increased population will place unacceptable risk of the fragile environment along the Canning River. 229.5 Proposed public open space is inadequate. 229.6 Traffic safety concerns from speeding particularly Clifton Street and Gilwell Avenue and at school pickup and drop off times. 229.7 Concerns regarding adequacy of road infrastructure to accommodate increase in traffic including Gilwell roundabout turning onto Albany Highway. 229.8 Lack of high frequency bus service in the locality for residents. 229.9 Proposal should provide for R40 only subject to appropriate urban design and service infrastructure and landscaping provision. 229.10 Proposal does not consider 18-month closure of Armadale train line. 229.11 240 bus should extend into development. 229.12 Road design should improve pedestrian crossing of Clifton Street.	229.1 Not supported, the adverting period was in accordance with the Planning and Development (Schemes) Regulations 2015. 229.2 Issue 4 - Bushfire Safety Concerns 229.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 229.4 Issue 1 - Environment Impact Concerns 229.5 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns 229.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 229.7 Issue 7 -Traffic and Trasport Infrastructure Concerns 229.8 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 229.9 Issue 2 - Housing Density and Built Form Concerns 229.10 Not supported, the train line is schedule to be reopened in October 2025 long before the Structure Plan area could be developed. 229.11 Noted, modifications to bus routes is the responsibility of the State Government's Public Transport Authority that was consulted on the proposed structure plan. 229.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
230.	Landowner	object	230.1 Building height 2 to 3 Storey not in keeping with locality. 230.2 Concern regarding impact to streetscape. 230.3 Loss of privacy and overlooking. 230.4 Concern regarding air and water land pollution and land degradation. 230.5 Bushfire safety concerns due to more residents. 230.6 Concerns with speeding on Clifton Street and congestion at Butler Pass intersection from school traffic. 230.7 Loss of tranquillity.	230.1 Issue 2 - Housing Density and Built Form Concerns 230.2 Issue 2 - Housing Density and Built Form Concerns 230.3 Issue 2 - Housing Density and Built Form Concerns 230.4 Issue 1 - Environment Impact Concerns 230.5 Issue 4 - Bushfire Safety Concerns 230.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 230.7 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
231.	Landowner	object	231.1 Increase in population and dwelling numbers is too high. 231.2 Overlooking and privacy concerns from 2 Storey development on Clifton Street 231.3 Will impact wildlife and river 231.4 Parking concerns and plan doesn't show parking. 231.5 Concern regarding anti-social behaviour and crime 231.6 Concern regarding adequacy of Clifton Street including speeding and congestion due to increase in traffic from development. 231.7 Concern regarding lack of traffic bridge proposal at Brookside Ave with increased traffic especially in bushfire situation with limited escape routes. 231.8 Concern regarding construction impacts including air and noise pollution. 231.9 Concern regarding increase to City rates to repair roads from construction activity. 231.10 Loss of semi-rural and beauty of the area due to development.	231.1 Issue 2 - Housing Density and Built Form Concerns 231.2 Issue 2 - Housing Density and Built Form Concerns 231.3 Issue 1 - Environment Impact Concerns 231.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 231.5 Issue 5 - Social Impact Concerns 231.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 231.7 Supported, the City recommends the matter of a need for a traffic bridge at Turner Pl / Brookside Ave be investigate in a revise TIA. 231.8 Issue 1 - Environment Impact Concerns 231.9 Issue 10 – Other Concerns 231.10 Issue 6 - Change/loss of Character and Visual Amenity
232.	Landowner	object	232.1 Concerns regarding increase noise, cars speeding on Clifton Street pedestrian safety and inadequate lighting on a single lane road. 232.2 Concern regarding multi-storey development interface to Clifton Street. 232.3 Concern regarding bulk, scale and appearance of new buildings. 232.4 Concerned regarding ant-social behaviour from future residents 232.5 Bushfire evacuation concerns due to limited escape routes made worse by more residents and no proposal for traffic bridge at Brookside Avenue. 232.6 Lack of detail on parking for residents and visitors 232.7 High rise not in keeping with semi-semi-rural character of area 232.8 Concerned regarding the environmental impacts on air, water pollution and land degradation. 232.9 Concern regarding construction impacts including increase traffic air and noise pollution. 232.10 Consultation period not long enough. 232.11 Proposal will set a precedent for development of land near mercy care to the south. 232.12 Bushfire evacuation concerns.	232.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 232.2 Issue 2 - Housing Density and Built Form Concerns 232.3 Issue 2 - Housing Density and Built Form Concerns 232.4 Issue 5 - Social Impact Concerns 232.5 Issue 4 - Bushfire Safety Concerns 232.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 232.7 Issue 6 - Change/loss of Character and Visual Amenity 232.8 Issue 1 - Environment Impact Concerns 232.9 Issue 7 -Traffic and Trasport Infrastructure Concerns 232.10 Not supported, the adverting period was in accordance with the Planning and Development (Schemes) Regulations 2015. 232.11 Issue 10 – Other Concerns 232.12 Issue 4 - Bushfire Safety Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
233.	Landowner	object	233.1 Proposal not in keeping with the appearance or natural tranquil nature of the area. 233.2 Concern regarding loss of turtle habitat and breeding area outside river. 233.3 River health will be impacted by urban water runoff/ pollution. 233.4 Development will result in loss of trees and bird habitat. 233.5 Density/ building height not in keeping with the existing residential of the suburb. 233.6 Bushfire evacuation concerns. 233.7 Road capacity concerns with increased traffic.	233.1 Issue 6 - Change/loss of Character and Visual Amenity 233.2 Issue 1 - Environment Impact Concerns 233.3 Issue 1 - Environment Impact Concerns 233.4 Issue 1 - Environment Impact Concerns heading Natural Environment and Trees. 233.5 Issue 2 - Housing Density and Built Form Concerns 233.6 Issue 4 - Bushfire Safety Concerns 233.7 Issue 7 -Traffic and Trasport Infrastructure Concerns
234.	Landowner	object	234.1 Refer to Submission 6.1 to 6.14 above.	234.1 Refer to Submission 6.1 to 6.14 above.
235.	Landowner	object	235.1 Concern with destruction of trees to make way for houses and damage to the riverbank which and negative impact on the Wood Ducks that live on the river. 235.2 Proposal doesn't meets the Transit Orientated Development requirements as area is excess of 1km walk to train station. 235.3 Bushfire evacuation concerns due to traffic congestion made worse by additional residential development. 235.4 Lack of visitor parking. 235.5 The size of the blocks is not in keeping with the garden / native bushland vibe of the area. 235.6 Development will set an undesirable precedent for similar development along the river.	235.1 Issue 1 - Environment Impact Concerns and report heading Natural Environment & Tree Retention 235.2 Issue 2 - Housing Density and Built Form Concerns 235.3 Issue 4 - Bushfire Safety Concerns 235.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 235.5 Issue 6 - Change/loss of Character and Visual Amenity 235.6 Issue 10 – Other Concerns
236.	Landowner	object	236.1 Concern regarding bushfires. 236.2 Higher density development is not suitable for the land in question due to flood plain, heavy clay soil and very high infrastructure costs.	236.1 Issue 4 - Bushfire Safety Concerns 236.2 Issue 1 - Environment Impact Concerns
237.	Landowner	object	237.1 R40-R80 is not in-keeping with nearby R15 properties 237.2 Infrastructure adequacy concerns schools, roads, shops and parking. 237.3 Bushfire evacuation concerns due to bottlenecks in 2011 bushfire will be worse due to increase in population. 237.4 Potential accidents where Brookside Ave enters Clifton Street. 237.5 Concern regarding impact to river and Bush Forever during and after construction, impacting local amenity including traffic, noise, smell and light. 237.6 Lack of Environmental Impact Assessment. 237.7 Concerns regarding impact to lifestyle and amenity.	237.1 Issue 2 - Housing Density and Built Form Concerns 237.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 237.3 Issue 4 - Bushfire Safety Concerns 237.4 Issue 7 -Traffic and Trasport Infrastructure Concerns 237.5 Issue 1 - Environment Impact Concerns 237.6 Issue 1 - Environment Impact Concerns 237.7 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
238.	Landowner	object	238.1 Physical destruction of the area (loss of food source, sanctuary, population stress), pollution and littering will adversely impact the habitat of the numerous animals, birds, reptiles and insects reliant on the river and its surround. 238.2 Object to high density and multistorey buildings. R80 development on Lot 1, and R60 development on Lot 12 Brookside Ave are too close to the river. 238.3 Concern regarding hard visual impact of high density, overlooking and artificial lighting at night. 238.4 Concern clearing of vegetation will increasing heat of tree canopy cover cannot be restored, a recognised problem in new suburbs. 238.5 Road layout will create wind tunnels for hot easterly winds. 238.6 Concern regarding noise , litter and other pollutants. 238.7 Objects to road running adjacent to the river as it will affect wildlife and attract hoons and antisocial behaviour.	238.1 Issue 1 - Environment Impact Concerns 238.2 Issue 2 - Housing Density and Built Form Concerns 238.3 Issue 2 - Housing Density and Built Form Concerns 238.4 Issue 1 - Environment Impact Concerns 238.5 Not supported, wind impacts are not required to be addressed in the WAPC's Guidance for Structure Plans, August 2023. 238.6 Issue 1 - Environment Impact Concerns & Issue 5 - Social Impact Concerns 238.7 Not supported, there is no information/ evidence that a road adjacent the river will cause speeding anti-social behaviour.
239.	Landowner	object	239.1 River/environmental health concerns. 239.2 School capacity concerns. 239.3 Increase traffic concerns. 239.4 Noise pollution concerns.	239.1 Issue 1 - Environment Impact Concerns 239.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 239.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 239.4 Not support, noise would be managed in accordance with Noise Regulations administered by the City.
240.	Landowner	object	240.1 The scale and appearance of the development will have a detrimental effect on the landscape, privacy, traffic congestion and local amenities such as schools. 240.2 Will also cause more noise and pollution in the area and to the river. 240.3 The local school is already at capacity. 240.4 Bushfire evacuation/safety concerns.	240.1 Issue 6 - Change/loss of Character and Visual Amenity, Issue 2 - Housing Density and Built Form Concerns, Issue 7 -Traffic and Trasport Infrastructure Concerns and Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 240.2 Issue 1 - Environment Impact Concerns 240.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 240.4 Issue 4 - Bushfire Safety Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
241.	Landowner	object	241.1 Concerned regarding impact on the Canning River. 241.2 Bushfire risk from Banyowla Park to the east and evacuation concern due to increase traffic congestion and limited escape routes i.e. Turner Rd footbridge only and Clifton Street for vehicles exiting to Albany Highway via the Gilwell Ave bridge or further along Clifton St to Orlando Rd bridge or even to Connell Ave via Martin though this would most likely be closed as during 2011 bushfires. 241.3 Concern regarding off-street parking for development. 241.4 Development is over 800m walking distance to train station/Kelmscott trains station so will not reduce use of cars. 241.5 Lack of cycle paths in the locality for cycle travel mode and danger for pedestrians if paths are used for e-scooters bicycle especially students at Clifton Hills Primary School. 241.6 Who will replant the Bush Forever and who will maintain it? 241.7 Concern regarding roadkill. 241.8 Will result in urban water run-off and loss of trees 241.9 Natural gas for development should not be used as it will damage environment and climate.	241.1 Issue 1 - Environment Impact Concerns 241.2 Issue 4 - Bushfire Safety Concerns 241.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 241.4 Issue 2 - Housing Density and Built Form Concerns 241.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 241.6 The developer would be responsible for rehabilitation of the Bush Forever and the City for ongoing management maintenance. 241.7 Supported, signage along the proposed POS interface road could be installed to alert drives to the potential for wildlife crossing roads. 241.8 Issue 1 - Environment Impact Concerns and report heading Natural Environment & Tree Retention 241.9 Not supported, the use of natural gas for domestic purposes is a State Government matter.
242.	Landowner	object	242.1 Does fit with existing social and environmental objective of the surrounding area. 242.2 Environmental Impact Assessment should be done. 242.3 Bushfire evacuation assessment should be done.	242.1 Issue 1 - Environment Impact Concerns & Issue 5 - Social Impact Concerns 242.2 Issue 1 - Environment Impact Concerns 242.3 Issue 4 - Bushfire Safety Concerns
243.	Landowner	object	243.1 Refer to submission 47.1 to 47.12 above.	243.1 Refer to submission 47.1 to 47.12 above.
244.	Landowner	object	244.1 No comments provided.	244.1 Noted.
245.	Landowner	object	245.1 Concern regarding environmental impact to biodiversity, habitat and river flora and fauna. 245.2 Concern regarding loss of trees. 245.3 Will cause erosion of riverbank. 245.4 More riverside vegetation should be retained. 245.5 More people from development will pollute the river.	245.1 Issue 1 - Environment Impact Concerns 245.2 Issue 1 - Environment Impact Concerns & report heading Natural Environment & Tree Retention 245.3 Issue 1 - Environment Impact Concerns 245.4 Issue 1 - Environment Impact Concerns 245.5 Issue 1 - Environment Impact Concerns
246.	Landowner	object	246.1 Refer to Submission 47.1 to 47.12 above.	246.1 Refer to Submission 47.1 to 47.12 above.
247.	Landowner	object	247.1 Refer to Submission 47.1 to 47.12 above.	247.1 Refer to Submission 47.1 to 47.12 above.
248.	Landowner	object	248.1 No comments provided.	248.1 Noted.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
249.	Landowner	object	249.1 Area could be put to a better use such as a leisure or wellness centre or an indoor sport centre.	249.1 Note supported, the City can only assess the structure plan as proposed.
250.	Landowner	object	250.1 High density living brings low socio-economic problems. 250.2 Strain on utilities and local school. 250.3 Property devaluation concerns caused by more dwellings. 250.4 Increase in crime and anti-social behaviour. 250.5 Negative impact on the Canning River and its cultural significance. 250.6 Increase in strain and pollution to natural surrounds.	250.1 Issue 5 - Social Impact Concerns 250.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 250.3 Issue 10 – Other Concerns 250.4 Issue 5 - Social Impact Concerns 250.5 Issue 1 - Environment Impact Concerns & Issue 8 - Heritage Concerns 250.6 Issue 1 - Environment Impact Concerns
251.	Landowner	object	251.1 Object due to stormwater runoff and sediment being detrimental to the health of the Canning River. 251.2 Bushfire evacuation concerns due to extra residents and limited exit point from the area. 251.3 Local school capacity concerns due to additional students. 251.4 Loss of canopy cover and urban heat island impact. 251.5 Environmental impacts to local wildlife. 251.6 Height and scale of buildings proposed impacting cultural heritage value of the area. 251.7 Increased in traffic and noise in the area reducing quiet enjoyable amenity of current residents.	251.1 Issue 1 - Environment Impact Concerns 251.2 Issue 4 - Bushfire Safety Concerns 251.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 251.4 Issue 1 - Environment Impact Concerns 251.5 Issue 1 - Environment Impact Concerns 251.6 Issue 2 - Housing Density and Built Form Concerns 251.7 Issue 7 -Traffic and Trasport Infrastructure Concerns & Issue 6 - Change/loss of Character and Visual Amenity
252.	Landowner	support	252.1 Extra house in the area will alleviate housing crisis.	252.1 Supported.
253.	Landowner	object	253.1 Small housing impacts physical and mental health of families living their living in them i.e. lack of garden and children’s play area. 253.2 Lack of parking for visitor -family and friends to high density development. 253.3 High density has no room for trees and gardens will increase urban heat island effect. 253.4 Bushfire safety concerns with more residents. 253.5 Local primary school and Kelmscott High school capacity concern due to more residents. 253.6 Increase traffic concerns.	253.1 Issue 2 - Housing Density and Built Form Concerns 253.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 253.3 Issue 1 - Environment Impact Concerns 253.4 Issue 4 - Bushfire Safety Concerns 253.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 253.6 Issue 7 -Traffic and Trasport Infrastructure Concerns
254.	Landowner	object	254.1 Disaster.	254.1 Noted

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
255.	Landowner	object	255.1 Bushfire evacuation concerns due to increase in residents and gridlocked roads that occurred in 2011 fires and limited escape routes - Gilwell Ave and Orlando St and no additional traffic bridge at Turner Pl/ Brookside Ave. 255.2 The Traffic Impact Assessment (TIA) assumes 1% growth in traffic doesn't account for proposals 395 dwellings. 255.3 Concern regard increase traffic on Clifton St especially during school peak times and potential accidents at intersections. 255.4 Kelmscott train station is greater than 800m walking distance from structure plan area. 255.5 A 50m buffer to estuary/wetland should be applied in accordance with SPP 2.9 255.6 Drainage basins detract from use POS for recreation. 255.7 A follow up detailed tree hollow inspection should be undertaken using drone inspection. 255.8 Concerned sand required to address the clay soils will eventually finding its way into the river as sediment impacting the health of the river. 255.9 Density should match exiting area.	255.1 Issue 4 - Bushfire Safety Concerns 255.2 Issue 7 -Traffic and Trasport Infrastructure Concerns & Road Network and Traffic Management 255.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 255.4 Issue 2 - Housing Density and Built Form Concerns 255.5 Issue 1 - Environment Impact Concerns 255.6 Issue 9 - Public Open Space, Drainage and Cost Sharing Concerns & heading Foreshore & Public Open Space Provision 255.7 Supported in part, the matter can be considered at subdivision stage. 255.8 Issue 1 - Environment Impact Concerns 255.9 Issue 2 - Housing Density and Built Form Concerns
256.	Landowner	object	256.1 Development on the banks of the Canning River would have a detrimental effect of plants and animals living in the area. 256.2 Supports decreasing coding and number of storeys of development. 256.3 Not in keeping with the local amenity and will detract from the semi-rural lifestyle that the hills side of Kelmscott. 256.4 Housing is important, but protection of the river and the environment, animals and plants need to be at forefront.	256.1 Issue 1 - Environment Impact Concerns 256.2 Issue 2 - Housing Density and Built Form Concerns 256.3 Issue 6 - Change/loss of Character and Visual Amenity 256.4 Issue 1 - Environment Impact Concerns
257.	Landowner	object	257.1 Development will increase traffic in the area. 257.2 Concern regarding consultation with Swan River Trust. 257.3 Concern regarding stormwater management and pollution to river. 257.4 Concern regarding increase in crime.	257.1 Issue 7 -Traffic and Trasport Infrastructure Concerns 257.2 Supported, the Swan River Trust has been consulted through the DBCA - Conservation and Ecosystem Management Division Rivers and Estuaries Branch. Refer to Report Government Agencies' Submissions. 257.3 Issue 1 - Environment Impact Concerns 257.4 Issue 5 - Social Impact Concerns

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
258.	Landowner	object	258.1 Loss of vegetation and density of the development would greatly affect the character of the area. 258.2 Increase in traffic will put a strain on facilities within the area which are currently unable to cope with demand e.g., difficulty getting doctor's appointments. Facilities should be upgraded before development. 258.3 Lack of commercial service nearby to service current population. 258.4 Area is too far away from the Kelmscott Commercial Centre to allow people to walk comfortably. 258.5 Lack of high frequency of public transport in the area. 258.6 Traffic would increase causing parking issues within the development and require an upgrade to Gilwell Ave bridge. 258.7 Development should retain more of the mature trees and have better landscaping.	258.1 Issue 1 - Environment Impact Concerns 258.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 258.3 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 258.4 Issue 2 - Housing Density and Built Form Concerns 258.5 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 258.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 258.7 Supported, the City recommends a revised LWMS to consider further tree retention outside the POS/foreshore area. At subdivision stage the City can recommend a condition for identification of trees on site worthy of retention.
259.	Landowner	object	259.1 Increase in residents will lead to an increase in crime and pollution in the area as seen around the housing development on Davis/Streich. 259.2 The current infrastructure can't support the current people in the area and the plan to add 987 more people. 259.3 Increase in domestic animals not kept within their homes will greatly impact the native wildlife. 259.4 Will increase crime at shopping centre.	259.1 Issue 5 - Social Impact Concerns 259.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 259.3 Not supported, the City required pets to be managed in accordance with local laws. 259.4 Issue 5 - Social Impact Concerns
260.	Landowner	comment	260.1 Site is greater than 800m walking distance to train station. 260.2 Increase traffic concerns on Brookside Ave and Clifton St including at Clifton Hills Primary School peak pick up and drop off times. 260.3 Structure Plan does not provide footpaths. 260.4 Concern regarding impact to river habitat and fauna. 260.5 Proposed density/housing not in keeping with surrounding single storey houses.	260.1 Issue 2 - Housing Density and Built Form Concerns 260.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 260.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 260.4 Issue 1 - Environment Impact Concerns 260.5 Issue 2 - Housing Density and Built Form Concerns
261.	Landowner	object	261.1 Concern future housing will deteriorate to resemble poorly maintained buildings, reminiscent of locations associated with illicit drug use or impoverished neighbourhoods. 261.2 Stormwater drainage of the area will pollute river.	260.1 Issue 2 - Housing Density and Built Form Concerns & Issue 5 - Social Impact Concerns 260.2 Issue 1 - Environment Impact Concerns
262.	Landowner	object	262.1 Refer to Submission 6.1 to 6.14 above.	262.1 Refer to Submission 6.1 to 6.14 above.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
263.	Landowner	object	263.1 High density will invite higher crime rates. 263.2 High density will increase traffic on a road that is already affected by speeding and unsafe drivers. 263.3 Development will disrupt the habitat of native wildlife. 263.4 Will result in 'Roadkill' of wildlife.	263.1 Issue 5 - Social Impact Concerns 263.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 263.3 Issue 1 - Environment Impact Concerns 263.4 Supported, signage along the proposed POS interface road could be installed to alert drives to the potential for wildlife crossing roads.
264.	Landowner	object	264.1 Transport Impact Assessment (TIA) 2017 traffic volumes is out-dated. 264.2 TIA peak period of analysis 7:45 - 8:45 and 15:30 - 16:30 is one hour however MRWA Operational Modelling Guidelines indicates 3 hours of data should be collected for each peak period, so TIA data is inaccurate. 264.3 Section 5.2.2 Volume Upscale Factor on Page 15 states that surveyed traffic volume data was determined to indicate equivalent data to pre-covid years (prior to 2020). This is outdated almost 4 years old now which provide inaccurate assumptions and/or conclusions. 264.4 Section 5.2.3 Other Assumptions on Page 15, it's noted that an "annual growth rate of 1.0% is applied to the 2021 traffic volumes to obtain 2024 and 2031 traffic flows. This is based on the historical traffic growth calculated from the available traffic counts within the surrounding road network. Although this is only an assumption, it is incorrect prediction of future traffic flows in the area. 264.5 The traffic data is inaccurate as it was collected in days when road closures were in place. 264.6 Concern with environmental assessment that Black Cockatoo nesting hollows were determined using ground-based survey and limited use of drones and loss of tree habitat. 264.7 Concern regarding height and density of buildings increasing towards the river will have a negative impact on current fauna and flora. 264.8 High density proposed development is excessive and disproportionate to the suitability of this land/area and should be scaled back.	264.1 Supported, refer to heading Road Network and Traffic Management 264.2 Not supported, the TIA uses WAPC Transport Impact Assessment Guidelines methodology. 264.3 Supported, refer to heading Road Network and Traffic Management for recommended modifications. 264.4 Supported in part, the City. has requested modelling of traffic based on development of the entire Canning River Clifton Street Urban Development Precinct to more accurately establish future traffic volumes/flows. 264.5 Supported, refer to heading Road Network and Traffic Management for recommended modifications. 264.6 Issue 1 - Environment Impact Concerns 264.7 Issue 2 - Housing Density and Built Form Concerns 264.8 Issue 2 - Housing Density and Built Form Concerns

265.	Landowner	object	265.1 Height, bulk, scale, appearance of building including 3 to 4 storey development and overlooking concerns.is excessive in contrast to surrounding suburb. 265.2 Residential density exceeds 15 dwelling per gross hectare of Sub-regional planning framework. 265.3 Housing and population increase is too high resulting in 36% increase in both in the Kelmscott locality. 265.4 Number of dwellings is 60% more than Canning Rivier Clifton Street South Structure Plan. 265.5 Multi storey development not suitable for retirees. 265.6 Concern regarding visitor parking in street/verge. 265.7 Concern regarding the capacity of road to accommodate bins. 265.8 Structure plan will change the look, feel & quality of lifestyle forever, the reason my family lives here. 265.9 Local amenity impact due to the removal of hundreds of mature trees. 265.10 Increase in noise and traffic and no noise impact assessment. 265.11 Urban Heat Island effect. 265.12 Small lots narrow verges don't provide enough room for landscaping. 265.13 Concern regarding traffic, noise, smell impacts as area has limited public transport and Clifton Hills Primar School students are driven to school. 265.14 Concern regarding multiple drainage basins in POS. 265.15 Concern regarding dust issues during construction phase. 265.16 Brookside Ave/ Clifton St intersection is dangerous. 265.17 Brookside Ave is too narrow without drainage and line markings, and no upgrades propose to Clifton Street. 265.18 No Aboriginal Heritage Assessment undertaken. 265.19 Concern regarding risk of erosion of the banks of the river and sediment entering the river. 265.20 Clay soils are not suitable for development. 265.21 Structure Plan does not include independent environmental assessment and government agency advice. 265.22 Concern regarding State Government agreement to buffer zone to Canning River. 265.23 Concern regarding changes to ground water levels. 265.24 Bushfire concerns including high density in bushfire prone areas and 2011 bushfires. 265.25 Concern regarding safety risk for pedestrians (including school students) on Clifton Street. 265.26 Proposal is greater than 800m walking distance to train station. 265.27 Concern development does not account for further development of the Canning River Clifton Street South Precinct. 265.28 Concern rate payers will pay cost for infrastructure upgrades.	265.1 Issue 2 - Housing Density and Built Form Concerns 265.2 Issue 2 - Housing Density and Built Form Concerns 265.3 Issue 2 - Housing Density and Built Form Concerns 265.4 Issue 2 - Housing Density and Built Form Concerns 265.5 Not supported, developments of 3 storeys and above require lifts. 265.6 Issue 7 -Traffic and Trasport Infrastructure Concerns 265.7 Supported, the matter could be considered at subdivision stage. 265.8 Issue 6 - Change/loss of Character and Visual Amenity 265.9 Supported in part, refer to heading Natural Environment & Tree Retention and Local Water Management Strategy 265.10 Issue 7 -Traffic and Trasport Infrastructure Concerns 265.11 Issue 1 - Environment Impact Concerns 265.12 Supported in part, the Structure Plan's Landscape Plan propose smaller trees due to limited verge space. 265.13 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 265.14 Supported refer to heading Local Water Management Strategy 265.15 Issue 1 - Environment Impact Concerns 265.16 Issue 7 -Traffic and Trasport Infrastructure Concerns 265.17 Issue 7 -Traffic and Trasport Infrastructure Concerns 265.18 Issue 8 - Heritage Concerns 265.19 Issue 1 - Environment Impact Concerns 265.20 Supported in part, refer to heading Local Water Management Strategy 265.21 Issue 1 - Environment Impact Concerns 265.22 Issue 1 - Environment Impact Concerns 265.23 Issue 1 - Environment Impact Concerns 265.24 Issue 4 - Bushfire Safety Concerns 265.25 Issue 7 -Traffic and Trasport Infrastructure Concerns 265.26 Issue 2 - Housing Density and Built Form Concerns 265.27 Issue 7 -Traffic and Trasport Infrastructure Concerns 265.28 Issue 10 – Other Concerns
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SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
266.	Landowner	object	266.1 It is setting a dangerous precedent for building so many more dwellings so close to the river. 266.2 Concern regarding contaminants in stormwater entering Canning River and impacting wildlife. 266.3 Bushfire evacuation concerns with more residents given only 2 exits from the area with roads gridlocked with traffic. 266.4 Density should be minimised.	266.1 Issue 10 – Other Concerns 266.2 Issue 1 - Environment Impact Concerns 266.3 Issue 4 - Bushfire Safety Concerns 266.4 Issue 2 - Housing Density and Built Form Concerns
267.	Landowner	object	267.1 Not enough services are available in the area for increase in population. 267.2 Low-cost housing will impact views. 267.3 Low-cost housing occupants will result in crime – drugs and drinking issues.	266.1 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 266.2 Issue 2 - Housing Density and Built Form Concerns 266.3 Issue 5 - Social Impact Concerns
268.	interest group	object	268.1 Proposal could set a precedent for high-density development in other areas of the State. 268.2 International examples of rehabilitation of rivers. 268.3 Other parts of the Canning River downstream from this proposal, should provide examples of what to do with a river frontage. Wilson, Ferndale, Cannington, Gosnells etc have kept wide reserves to the Canning River. 268.4 River flooding concerns. 268.5 Concern regarding filling of land for large scale development near river.	268.1 Issue 10 – Other Concerns 268.2 Noted. 268.3 Noted. 268.4 Issue 1 - Environment Impact Concerns 268.5 Issue 1 - Environment Impact Concerns
269.	Landowner	object	269.1 Moved to the area to take advantage of the peace and tranquillity of the natural environment. 269.2 If proposal is approved it will open the flood gates to developers to submit similar proposals along the river. 269.3 Development will destroy habitat for wildlife e.g. native ducks, turtles, skinks. 269.4 Swan River Trust has power to stop proposal. 269.5 Proposal will impact on the volume traffic on the roads as we all travel on Clifton Street and Gilwell Avenue to get to the shopping centre. 269.6 Proposal will change the 'community' feel of this area.	269.1 Issue 6 - Change/loss of Character and Visual Amenity 269.2 Issue 10 – Other Concerns 269.3 Issue 1 - Environment Impact Concerns 269.4 Noted, the Swan River Trust has been consulted through the DBCA - Conservation and Ecosystem Management Division Rivers and Estuaries Branch. Refer to Report Government Agencies' Submissions. 269.5 Issue 7 -Traffic and Trasport Infrastructure Concerns 269.6 Issue 6 - Change/loss of Character and Visual Amenity

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
270.	Landowner	object	270.1 Train station is greater than 800m walking distance from structure plan area. 270.2 Limited commercial/food shopping within 800m. 270.3 Concern regarding increase in traffic on roads due to distance to train station and most employments centres away from train service. 270.4 Impact to native wildlife due to use of Bush Forever for POS/drainage. 270.5 Drainage basins and amended soils will impact health of river. 270.6 Impact to native birds due to removal of trees including nesting hollows. 270.7 Bushfire concerns regarding ember attack to evaporative air conditioners and provision of adequate water supply. 270.8 Heat Island effect due to removal of trees/canopy cover. 270.9 Density suggested is not in keeping with ambience of Kelmscott which is a quiet natural environment and existing community. 270.10 Development will set a precedent for further such development along the river.	270.1 Issue 2 - Housing Density and Built Form Concerns 270.2 Issue 3 - Social and Commercial Infrastructure Adequacy Concerns 270.3 Issue 7 -Traffic and Trasport Infrastructure Concerns 270.4 Issue 1 - Environment Impact Concerns 270.5 Issue 1 - Environment Impact Concerns 270.6 Issue 1 - Environment Impact Concerns 270.7 Issue 4 - Bushfire Safety Concerns 270.8 Issue 1 - Environment Impact Concerns 270.9 Issue 6 - Change/loss of Character and Visual Amenity 270.10 Issue 10 – Other Concerns
271.	Landowner	object	271.1 The change from present Clifton Hills' zoning of R15 to R50 to R60 proposed is far too severe. 272.2 35% increase in population impacts too greatly on road access, noise and general living. 272.3 Flooding of the river especially in times of heavy rainfall especially on future R80 high density housing.	271.1 Issue 2 - Housing Density and Built Form Concerns 271.2 Issue 7 -Traffic and Trasport Infrastructure Concerns 271.3 Issue 1 - Environment Impact Concerns
272.	Landowner	object	272.1 Need to ensure adequate parking is supplies for visitors and trades people.	272.1 Issue 7 -Traffic and Trasport Infrastructure Concerns
273.	Landowner	object	273.1 People who live in high rise accommodation would be unable to walk in bushland in Kelmscott Area. 273.2 Possible that run-off from units would affect effect river.	273.1 Not supported, there is nothing preventing existing or future occupants of medium/high density using parks. 273.2 Issue 1 - Environment Impact Concerns
274.	Landowner	comment	274.1 East side of Clifton Street should be rezoned with the same codes.	274.1 Not supported, the east side of Clifton Street is developed and has development potential to R25. The Canning River Clifton Street Urban Development Precinct is zoned Urban Development and housing density is determined in a structure plan.
GOVERNMENT AGENCIES AND SERVICE PROVIDER SUBMISSIONS				

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
1	Telstra - Planned Services Field Services Group	comment	No objections	Noted, no change to the Structure Plan is required.
2	Water Corporation	comments	Reticulated water is currently available to the subject area. All water main extensions, if required for the development site, must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice. Water Corporation will undertake high level reticulation network planning and provide to the applicant as part of the subdivision process. Reticulated sewerage is currently available to the subject area. All sewer main extensions, if required for the development site, should be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice. The development will connect into the wastewater pump station in the northwest corner of the subject site via extension of the existing reticulation network. The developer is expected to provide all water and sewerage reticulation as well as pay Infrastructure Contributions for Water and Sewerage.	Noted, standard Water Corporation advice, no change to structure plan required.
3	Department of Education	comments (no objections)	The proposed Structure Plan site falls within the student enrolment intake areas of Clifton Hills Primary School and Kelmscott Senior High School. Based on current and future student enrolment and residential growth projections, it is anticipated that the dwelling yield of 365 lots would not significantly impact on the accommodation capacity of the subject schools. Notwithstanding this, the Department will continue to monitor the student enrolments and residential growth in the broader locality. In view of the above, the Department has no in principle objections to the proposed Structure Plan.	Noted, no change to the Structure Plan is required.

4	Department of Fire & Emergency Services (DFES)	comments	Introduction This advice relates only to State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7) and the Guidelines for Planning in Bushfire Prone Areas (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with all other relevant planning policies and building regulations where necessary. This advice does not exempt the applicant/proponent from obtaining necessary approvals that may apply to the proposal including planning, building, health or any other approvals required by a relevant authority under other written laws. Assessment • It is noted that the area is currently zoned as Urban Development and the Local Structure Plan seeks to change residential density and proposes R40 to R80 with an estimated 395 dwellings. • It is unclear how the lots in R80 would be developed to their full potential without future buildings being impacted by BAL40/FZ. • Further clarification is required within the BMP of the requirements of SPP 3.7, and the supporting Guidelines as outlined in our assessment below. 1. Policy Measure 6.3 a) (ii) Preparation of a BAL Contour Map Issue: Vegetation Management Assessment: - Management of Bush Forever and conservation category wetland (CCW) A low threat exclusion has been applied to a 6-metre strip of the adjacent bush forever however, there is no evidence of a legally binding agreement to detail who is responsible for the management of this area or how it will be achieved. Technical evidence and verification should be included in the BMP to qualify the vegetation exclusion can be achieved and under what legislative instrument it is enforceable in perpetuity. The management of this area does not achieve BAL-29 on the urban cells adjacent to the bush forever, it only reduces the area of the lot covered by BAL-40. Furthermore, the draft SPP 2.9 states that no bushfire mitigation strategies are to be contained within a waterway foreshore area or wetland buffer. It is unclear if this area is within the Canning River foreshore area. Action: Modification to the BMP required. Method 2 - DFES notes that there is some lack of clarity around definitions for inputs to Method 2 calculations, of particular relevance to this application are those regarding effective slope. In the absence of clear instruction to the contrary, DFES considers that the Method 2 normative procedure should apply the 5-degree increments for effective slope, as per Method 1, rather than discrete figures. Deviation from this would require a comprehensive Performance Solution that complies with the relevant Bushfire Resistance Performance Requirements of the National Construction Code (NCC). The BMP applies a 1-degree downslope for some calculations, which should instead use a 5-degree downslope to comply with the Method 2 normative procedure.	Issue: Vegetation Management Assessment: Supported. The City does not agree to maintain proposed POS as low fire threat to achieve asset protection zone (APZ) requirements. The City cannot guarantee maintenance of its POS especially during high to extreme fire danger summer months where use of equipment - movers etc may be prohibited due to risk of causing fire/ignition. Bushfire assessment should be based on vegetation being unmanaged. WAPC SPP 3.7 Planning for Bushfire Guidelines indicates the prior agreement of the City is required for maintenance of public land as low fire threat vegetation and relevant information is to be included in the BMP. This has not occurred and would not be supported for the reason above. The City would also be concerned that low fire threat landscaping of POS may not achieve the City's objectives for POS areas. Issue: Method 2 Supported, slope analysis should be consistent with the WAPC SPP 3.7 Planning for Bushfire Guidelines. Issue: Location & Siting and Design and Extreme bushfire hazard and/or BAL-40/ BAL-FZ applies to residential land. Supported. The City agrees with the FESA analysis and identification of the above issues as being inconsistent with WAPC's SPP 3.7 Planning for Bushfire Guidelines which indicates residential lots must be subject to a BAL 29 or below to meet the criteria Location and Siting and Design criteria of SPP 3.7 Bushfire Guidelines. The BMP should not be supported on the basis of the comments above. The Structure Plan and BMP be revised to address the issues of DFES.
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			In addition, the transects to support the inputs have not been provided, they should be illustrated on the BAL Contour Map. Accordingly, DFES advises that the Method 2 outputs cannot be validated. It should be noted that a Method 2 will not result in the required separation distance to achieve lots in BAL-29 as per the policy requirements. In order to provide a Performance Solution, the relevant verification method is GV5 Buildings in bushfire prone areas. GV5 is a means to verify the appropriate risk of ignition from a bushfire in order to meet the bushfire resistance requirements of GP5.1. For further guidance, refer to the ABCB Buildings in Bushfire Prone Areas Verification Method Handbook. Action: Modification to the BMP required. 2. Policy Measure 6.3 c) Compliance with the bushfire protection criteria Location & Siting and Design Assessment: Location & Siting and Design A1.1 & A2.1 – not demonstrated. The BAL ratings cannot be validated, as the vegetation classification inputs associated with the Method 2 and Bush Forever vegetation management strategies cannot be validated. The BMP states that Element 1 has been achieved as the subject lot is impacted by a moderate or low bushfire hazard in the post development scenario. The subject lot has an extreme hazard remaining within the lot boundary which directly impacts the proposed urban development. The BMP also states that Element 2 has been achieved as an area of BAL-29 will be available on the future lots to accommodate a building. This focusses on the future dwelling which is not relevant at the structure plan stage and relies on a 10.5m setback on lots proposed to be R80. The urban development cell impacted by BAL-40 is zoned R80 which has a minimum required setback of 1 metre in the Residential Design Codes. Given the high density zoning it is unclear how the lots would be developed to their full potential without future buildings being impacted by BAL40/FZ. Given the Method 2 and vegetation management strategy in the POS area and Bush Forever area cannot be validated, the lot would be impacted by 15 metres of BAL-FZ/40. If the vegetation management strategy in the POS area and Bush Forever is supported by the City, this would reduce to 10 metres impacted, which has informed the proposed setback. The structure plan should be redesigned to ensure adequate separation from areas of environmental value and avoid the need for vegetation clearing. It should consider increasing hazard separation in the form of managed public open space, wider perimeter roads and consider the density zoning to ensure good planning outcomes at subsequent planning stages. Action: Modification to the BMP required. The structure plan should be redesigned to achieve all lot in BAL-29 or lower. 3. Policy Measure 6.7 Strategic planning proposal, in areas where an extreme BHL and/or BAL-40 or BAL-FZ applies	
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SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			Issue: Extreme bushfire hazard and/or BAL-40/ BAL-FZ applies Assessment: Subdivision and development applications for vulnerable or high-risk land uses in areas of BAL-40/BAL-FZ will not be supported unless they comply with policy measure 6.7, clause 6.7.1 / 6.7.2 of SPP3.7. The proposal is not considered to meet the definition of minor or unavoidable development. Action: Comment only. Recommendation – compliance with acceptable solutions not demonstrated – modifications required. The BMP does not adequately address the policy requirements of SPP 3.7 and the Guidelines. DFES has assessed the structure plan and accompanying BMP. There are several issues that need to be addressed prior to support of the proposal (refer to the tables above). The application has not demonstrated that future compliance to the following elements can be achieved: • Element 1: Location, • Element 2: Siting and Design	

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
5	Department of Biodiversity Conservation and Attractions	comments	In reference to your correspondence dated 24 July 2023, the Swan Region office of the Department of Biodiversity Conservation and Attractions (DBCA) will defer to DBCA's Rivers and Estuaries Branch who will provide comment on the Structure Plan to the City of Armadale.	Noted, refer to DBCA - Conservation and Ecosystem Management Division Rivers and Estuaries Branch submission below.
6	Main Roads WA	Comments	In response to your correspondence received on 26 July 2023 and 30 August 2023, Main Roads provides the following comments regarding the above structure plan. 1. Transport Impact Assessment Based on the review of the Transport Impact Assessment (TIA) (Ref CW1199700, Rev A, dated 24 June 2022) prepared by Cardno (now Stantec), there is uncertainty regarding the level of traffic impact associated with development of the structure plan area. The TIA is to be revised addressing the following matters: a) Further justification is required for the use of trip generation rates for 'Multifamily Housing (mid-rise)' which have been sourced from 'high density residential flat dwellings' in RMS Technical Direction TDT 2031/04a. These rates were determined using surveys of developments that are greater than six storeys and are not considered appropriate for single residential dwellings. Applicant is to revise the trip generation rates used. b) The development yield in Table 5-3 of the TIA (397 dwellings) is to be revised to align with the estimated 395 dwellings in the Structure Plan report. c) Traffic survey information used was from November 2021, where lane closures were in place along Albany Highway, right-turning movements to/from Gilwell Avenue were restricted and taken prior to the commissioning of traffic signals at the intersection of Albany Highway and Fancote Street. Whilst it is noted that assumptions and sensitivity testing was included to account for missing data, a sense check of traffic volumes confirms turning movements provided in the TIA does not reflect current demands. It is recommended that traffic volumes are updated and modelled accordingly. d) The TIA provides crash information for intersections in the immediate vicinity of the structure plan area. It is recommended to consider the crash data of the wider transport network. e) Section 3.2 of the TIA shows three access points along Clifton Street and does not align with the intersections assessed under Section 5. Please clarify and amend accordingly. f) SIDRA gap acceptance values have been modified from the default values. The modelling should be revised to use default values or justification provided for the modified values. Should the City disagree with the above advice, Main Roads requests an opportunity to meet and discuss the proposal further, prior to a final determination being made.	1a) Supported in part. The City does not support justification for the trip generating rates used in the TIA but rather the TIA trip generation rates should be consistent with those indicated in the WAPC's Transport Impact Assessment Guidelines. 1b) Supported. Dwelling numbers in the TIA should be consistent with the Structure Plan dwelling numbers for consistency and appropriate traffic modelling. 1c) Supported. More recent traffic data will ensure more accurate traffic modelling. d) Supported. The crash data requested by MRWA would assist with designing for traffic safety. e) Supported in Part. The City's Technical Services only supports 2 entry roads to the structure plan area. The Structure Plan and TIA should be modified to detail only 2 entry roads. f) Supported - SIDRA data should be to MRWA requirements. The Structure Plan and TIA be modified to address the issues and revisions recommended by Main Roads WA.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
7	Department of Health	Comments	In relation to the management of wastewater, the Department of Health has no objection to the proposal, subject to all new development proposals being connected to reticulated sewerage.	Supported. The Structure Plan area will be required to be connected to reticulated sewer. No change to the Structure Plan is required.

8	Department of Biodiversity Conservation and Attractions - Conservation and Ecosystem Management Division Rivers and Estuaries Branch	objection	DBCA advises that it cannot support the proposed Structure Plan until the following issues are addressed and the plans amended accordingly. Foreshore Areas and Buffers The Structure Plan area includes a 30m wide area of 'Rural' zoned foreshore land that runs adjacent to the Canning River. It is understood from the Structure Plan report that this land was zoned 'Rural' as an interim measure with the intention of it becoming Parks and Recreation (P&R). The Structure Plan refers to this land as 'Foreshore Reserve' and proposes to cede it along with an adjoining 0.7ha of Public Open Space comprising the extent of Bush Forever Area 246, most of the area categorised as Conservation Category Wetland (CCW) (UFI: 15689) and the 100-year floodway and flood fringe area. DBCA considers that the entire Bush Forever Area 246 and CCW area should be included in the P&R reserve. Further, the CCW and Bush Forever Area 246 would best be protected through the implementation of a minimum 30m wide buffer area. The buffer is necessary to provide for protection of the CCW, the river environment and its associated conservation and landscape values. Further, it will also provide opportunities for comprehensive and coordinated rehabilitation and foreshore management and is in keeping with Guidance Statement No. 33: Environmental Guidance for Planning and Development (EPA 2008), that seeks to provide for buffers for high conservation value wetland areas. Foreshore Management Plan The Structure Plan should be supported by a Foreshore Management Plan to outline how stormwater management, bushfire management, landscaping, development interface and subdivision works will not adversely impact on the Canning River and the associated foreshore. The Foreshore Management Plan should outline rehabilitation of the Bush Forever Area, CCW and the extent of replanting within the 30m buffer area. Further, the Foreshore Management Plan should include provision for passive recreation such as a public access pathway to be implemented in a coordinated approach. Protection of vegetation The Structure Plan report states that the majority of the lots are cleared of native vegetation. Further evidence should be provided to support the removal of the vegetation throughout the development. DBCA considers that opportunities for retaining mature vegetation throughout the urban development area should be further explored in line with the City of Armadale Urban Forest Strategy and Better Urban Forest Planning Guidelines (WAPC, 2023). Local Water Management Strategy (LWMS) Stormwater management for the site should address Corporate Policy Statement 49: Planning for Stormwater Management Affecting the Swan Canning Development Control Area, the Department of Water and Environmental Regulation's Stormwater Management Manual for Western Australia (2004-2007), Decision Process for Stormwater Management in Western Australia (2017) and be consistent with principles of water sensitive urban design.	Foreshore Areas and Buffers Extend the Foreshore Area Not Supported - the DBCA recommendation for the entire Bush Forever Area 246 and CCW along the Canning River to be included in Regional Parks and Recreation reserve is inconsistent with Environmental Review Canning River Precinct 23 September 2009 for MRS Amendment 1202/41 that rezoned the Structure Plan area Urban and retained the identified Regional Parks and Recreation reserve in the Rural zone. This proposal is also inconsistent with the City's Town Planning Scheme No.4 Development (Structure Plan) Area 44 clause 44.3 (iv) suitable provision of 10% standard Public Open Space contributions, predominantly by augmenting and extending the width of the Canning River foreshore reserve area, creating pocket parks, or in accordance with policies of the Western Australian Planning Commission equivalent cash in lieu contributions which can be used to improve public recreation opportunities and facilities in the foreshore POS reserve areas. 30m wide buffer Supported in part – the City supports the statement for coordinated rehabilitation and foreshore management and, Not supported in part – a buffer to the river was determined in the Environmental Review Canning River Precinct, 23 September 2009. Foreshore Management Plan Supported. The Applicant has not submitted a Foreshore Management Plan which is required under the City's Town Planning Scheme No.4 Development (Structure Plan) Area 44 clause 44.3 (v) providing Canning River foreshore reserves and management. Refer to Agenda Report – Analysis – Foreshore and Public Open Space Provision and Schedule of Issue and Modifications for further details. Protection of vegetation Supported. The City can recommend a condition on subdivision approval for the identification of vegetation on site worthy of protection prior to subdivision works commencing including vegetation outside the POS area and/or CCW and Bush Forever land.
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		The proposed strategy for managing stormwater runoff from the development, is to direct the water through pits and pipes to a number of large, constructed basins within the public open space adjacent to the river. These basins have been sized to infiltrate the first 15mm and detain up to a 1% AEP. This approach is not consistent with best practice water sensitive urban design for the following reasons: - Stormwater retention and/or detention should occur as high in the catchment and as close to the run-off source as possible. Further opportunity to retain or detain as much of the smaller rainfall events (i.e. first 15mm) within the road reserves (i.e. tree pits, rain gardens, roadside vegetated swales and biofilters) should be considered as part of the LWMS. The size and number of basins is considered excessive. Large, deep basins do not provide appropriate aesthetic or useability outcomes and are not supported, particularly in areas of known conservation value such as Bush Forever or mapped CCW areas. - Pipe outfalls into the Canning River shown on Figure 5 of the LWMS are considered excessive and should be minimised. Opportunities for overland flow paths should be utilised as an alternative to the proposed outfalls. DBCA does not support the proposed location of the stormwater detention basins in the Bush Forever and CCW areas. The proposed basins will prevent the proper rehabilitation of the CCW and Bush Forever areas and necessitates unnecessary removal of vegetation. Further, construction of large basins will be difficult to manage without damaging additional vegetation. Appendix H, Statement relating to the location of Drainage Basins (EDS Environmental, 2023) does not provide adequate justification for siting basins in these areas. Piping roof runoff directly to the river was discussed in the LWMS as an option to manage volumes of stormwater, however this is not supported by DBCA as it would require an excessive amount of additional pipework, may cause erosion issues from additional pipe outfalls to the river, and is not in line with best practice water sensitive urban design. Roof runoff would best be managed closer to the source, higher up in the catchment. Section 3.2 of the Local Structure Plan report references a constructed drainage line that flows along the southern boundary of Lot 12 Clifton Street and across the western part of the lot. Opportunities for utilising this existing flow path should be explored, through the potential conversion of the drain to a living stream. The living stream would improve the quality of the water discharging to the Canning River and have the added benefit of enhancing the environmental values of the area through the addition of native vegetation and creation of habitat. Bushfire Management The Bushfire Management Plan states in Table 1: Ecological database assessment, that the land is not affected by a conservation wetland or buffer. This should be amended to include the classification of Conservation Category Wetland (UFI: 15689). The plan should be updated to include the full extent of the Bush Forever Area and CCW in the area proposed to be revegetated to forest. DBCA does not support the Bush Forever area or CCW being managed in a low threat state to reduce the development setbacks required to be provided by the developers.	Local Water Management Strategy (LWMS) Supported. the issues of the BDCA regarding the LWMS are generally consistent with those of the City. The applicant was requested to submit a revised LWMS that addressed the issues and modifications of the City and the DBCA but has not done so within the agreed timeframe end of February 2025. Refer to Agenda Report – Analysis – Local Water Management Strategy and Schedule of Issue and Modifications. Bushfire Management Supported. Table 1 of the bushfire management should identify Conservation Category Wetland (UFI: 15689) Supported in part – the maintenance of CCW/Bush Forever as low fire threat for bushfire management/asset protection zone is not supported by the City. Refer to comments above on DFES submission under heading – Issue: Vegetation Management. The Structure Plan and above-mentioned technical reports be revised/or prepared to address the issues of DBCA that are supported or supported in part above by the City.
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SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
			DBCA officers are happy to assist with further information regarding the issues outlined above. In its current form the Structure Plan is not supported, however should the WAPC be considering approving the plan, please contact the officer above for recommended conditions and advice.	

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
9	Department of Water and Environmental Regulation	comments	The Department has identified that the proposal has the potential for impact on water values and management. While the Department does not object to the proposal, key issues and recommendations are provided below and these matters should be addressed: Given the proposed structure plan is adjacent to the Canning Rivere foreshore area and falls within the Swan River Trust Development Control Area, the Department defers to the Department of Biodiversity, Conservation and Attractions for comments. The Department of Biodiversity, Conservation and Attractions should be consulted regarding their requirements for the adjacent Canning River foreshore and Conservation Category Wetland (CCW) area.	Noted. Refer to DBCA Conservation and Ecosystem Management Division Rivers and Estuaries Branch submission above.
10	Department of Planning Lands and Heritage Aboriginal Heritage	comments	A review of the Register of Places and Objects as well as the Department of Planning, Lands and Heritage (DPLH) Aboriginal Heritage Database concludes that the subject area intersects with Aboriginal Registered Site ID 3538 (Canning River). Therefore, based on the current information held by DPLH, approvals under the Aboriginal Heritage Act 1972 (AHA) will be required for future works within the subject area. Please refer future proponents to the DPLH website at Aboriginal Heritage Approvals (www.wa.gov.au) for information on 'Land use under the Aboriginal Heritage Act 1972' for the types of approvals available under the AHA and how to apply. I also advise future proponents to regularly check the Aboriginal Cultural Heritage Inquiry System (ACHIS) should new Aboriginal Cultural Heritage be reported within the subject area. You can search ACHIS by using the following link: Aboriginal Cultural Heritage Inquiry System (dplh.wa.gov.au).	Supported, a review of mapping of Aboriginal Registered Site indicates ID 3538 is primarily within the proposed foreshore reserve which would protect it from clearing/ development works however the Structure Plan report did not adequately comment on and map ID 3538. The Structure Plan report be revised to more accurately comment of on Aboriginal Registered Site ID 3538 through mapping and commentary.

SCHEDULE OF SUBMISSIONS PROPOSED STRUCTURE PLAN – CANNING RIVER & CLIFTON STREET (NORTH) PRECINCT, KELMSCOTT				
NO	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
11	Department of Transport (DoT)	comments	The Urban Mobility (UM) division of DoT has reviewed the submitted documents and has no objection to the proposal in principle, however recommends the following issues are addressed before progressing to formal lodgement with the Western Australian Planning Commission (WAPC). 1. Per the submitted Local Structure Plan report (Harley Dykstra, dated 23/5/2023) the proposed movement network and pedestrian and cycle network will be detailed at subdivision stage (part 2, section 5.4.6 and 5.4.7). Part 1, section 4.5 states that “pedestrian pathways are to be constructed by the subdivider in the locations shown on the Structure Plan and to the specifications of the City of Armadale.” (page i), however this level of detail is not included in the Structure Plan, except for the proposed north-south shared path, which is denoted as ‘indicative location’. 2. The Transport Impact Assessment (TIA) does not include a safe walk to school assessment, as detailed in the TIA guidelines vol 2 section 10.10.9. Clear and safe routes for pedestrians/people on bikes must be provided from the subject area to Clifton Hills Primary. 3. The TIA does not include road cross sections. These should be provided in accordance with TIA guidelines vol 2, section 10.6. Road cross sections should also detail proposed footpaths. 4. Proposed roads reserves should be consistent with Liveable Neighbourhoods and provide good amenity between the adjacent residential area to the east and the future foreshore area within the subject site for non-car modes. 5. Further detail regarding the interface with/future connections through the adjacent land to the south should be provided, given the location of the subject site within the 800m walkable catchment of Kelmscott station and It is therefore recommended that the TIA be amended to include road cross sections and a safe walk to school assessment, and that the structure plan be updated to include pedestrian path locations, to ensure the proposed paths for non-car modes are legible and integrated with the existing movement network, along logical desire lines.	Supported. The information requested by the DoT is generally consistent with the information requirements indicated in the WAPC’s Transport Impact Assessment Guidelines. The TIA and Structure Plan be revised to address the issues of the Department of Transport.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
Exec. Summary, 5.4.8 Proposed Movement Capacity, 5.1 Activity Centre Employment, Appendix D Transport Impact Assessment (Appendix D Site Plan)	Retirement Village on Lot 11	- Remove reference to retirement village – and reword relevant paragraphs appropriately. - Remove reference to R60 and R80 density.	- Prior to advertising the Structure Plan the City requested the Applicant provide further information on the retirement village including the proposed land uses classification, development standards and controls i.e. Local Development Plan and tenure. The Applicant chose to remove the retirement village from the Structure Plan map, however reference still remains in the Structure Plan report and technical reports. - R60 and R80 (high density) is not supported as the Structure Plan area is greater than 800 metres walking distance to the Kelmscott Train Station which indicates that higher densities may not be justifiable under the WAPC'S <i>Development Control Policy 1.6 – Planning to Support Transit Use and Transit Oriented.</i> (DCP 1.6)
Structure Plan Summary Table Page i	Table data as proposed	The details under table headings - Item, Data and report section require updating to addresses matters raised in this Schedule of Issues/Modifications, detailed below.	The Applicant's attention to issues and modifications in this Schedule will require changes to the Structure Plan Summary Table.
Structure Plan Map	Structure Plan Map	The Structure Plan Map is to be revised to address the issues/modifications detailed in this Schedule including: Public Open Space (POS) provision is to be based on the following principles: - Compliance with <i>Liveable Neighbourhoods</i> (LN) policy public open space methodology; - Structure Plan POS provision as land is only required for the 4 lots adjoining the river. Lot 11 (No.1) Clifton St (cnr Brookside) is to provide its POS contribution	Revisions to the Structure Plan Map are required to address issue and modifications to the Structure Plan report and technical reports detailed in this Schedule.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		separately at subdivision stage as cash-in-lieu of POS for improvement of Structure Plan POS adjoining the foreshore due to size of the landholding; - All CCW and Bush Forever land is to be contained within the Foreshore Reserve (Rural zoned land) and/or POS and is to be ceded free of cost. CCW and Bush Forever land is to be deducted from the site area of relevant lots for calculation of POS as per WAPC Policy; - All drainage infrastructure - basins are to be located outside the Foreshore reserve/CCW and Bush Forever land; - POS credit or otherwise for drainage infrastructure to be consistent with LN Policy; - A pocket park is to be provided in the POS for active/passive recreation (outside CCW/Bush Forever land) in accordance with TPS4 Schedule 8 - Development (Structure Planning Areas) No. 44 clause 43.3 iv); - The requirement and width of a CCW buffer if any is to be based on a negotiated outcome between the DBCA, the Applicant, the City and the WAPC; and, - Preparation of revised LWMS, Bushfire Management Plan, Landscape Plan and a Foreshore Management Plan is to be based on the POS outcome of design principles above. Housing Density: - Remove R60 and R80 density and replace with R40 as per Revised Structure Plan. - Consider/provide an appropriate residential density/design interface to Brookside Ave e.g. laneway lots or other approach. Transport and Road Network:	

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		- A maximum of 2 entry roads from Clifton Street with one at Clifton St & Tara Wy intersection; - Roundabouts at the proposed intersections Clifton St/Tara Wy and potentially at the 4-way intersection in the structure plan area subject to a revised Traffic Impact Assessment (TIA) investigation. - Road reserve widths to be based on a revised TIA and LN policy. - A shared path on the west side of Clifton Street and south side of Brookside Ave. - Other modification as determined appropriate by preparation of a revised TIA (refer to City comments below on TIA) - The POS perimeter road is disjointed (in two sections) the City's preference is for a continuous perimeter road adjacent the POS. Bushfire Management - Ensure an adequate asset protection zone (APZ) of BAL 29 or below to the residential cells through combination of a wider POS perimeter road reserve width, shared path and/or other mechanism/works in POS (subject to prior City agreement) to achieve BAL 29 or less to residential cells. - Ensure vegetated drainage basins in POS do not impact on any agreed APZ in POS. Local Water Management Structure Plan POS including drainage provision is to be guided by a revised Local Water Management Strategy and Foreshore Management Plan acceptable to City and DBCA including:	

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		- Investigate the potential to amalgamate catchments and/or basins with due regard to land ownership; - Basins to be located outside CCW/Bush Forever areas; - Basin design to consider access, potential for construction disturbance to CCW/Bush Forever land and ongoing maintenance implications. - Basins sizing and design is to be based on a primary drainage strategy for the structure plan area including proposals to address site soil infiltration issues. A combination of earthworks/ and fill to provide lot (a source) infiltration and detention/storage with overflow connections to the street drainage network and detention in down-stream basins in POS is preferred, or other design as may be agreed to by the City.	
Structure Plan Part 1 – Implementation			
4.1 Page i	<i>"Subdivision within the Structure Plan area is to be in accordance with the residential density code prescribed by the Structure Plan, subject to review at the time of subdivision."</i>	Reword with red text: <i>"Subdivision within the Structure Plan area is to be in accordance with the land uses and residential density code prescribed by the Structure Plan."</i>	To improved clarity. The <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> provides for discretion to vary structure plans at subdivision stage.
4.4 Page i	<i>"A Local Development Plan (LDP) will be required to be prepared as a condition of subdivision approval for any lots directly abutting a portion of Public Open Space (POS). The purpose of the LDP will be to prescribe the provision of semi-permeable fencing adjacent to the POS to ensure sufficient surveillance over that space."</i>	No lots abut POS so clause should be reworded to cover other Local Development Plan (LDP) issues below: - Dwelling orientation to Clifton Street and garage locations at laneways; and - maximum and minimum building heights: ▪ R40 - maximum building height 2 stories. - Garage and cross over locations and other specific or general variations to R-Codes that are typically varied in LDPs for small lots as may be required to achieve satisfactory development outcomes.	The section/statement is inaccurate.
Structure Plan Part 2 – Report			
1.1 Intro. & Purpose	<i>"The ultimate objective of this proposal is to facilitate the subdivision and</i>	Reword the statement to clarify that "developing urban environment" is the balance of the Canning River Clifton	The statement objective is too narrow.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
Page 4	<i>development of the land for residential land uses in a manner that interacts appropriately with the developing urban environment in this locality."</i>	Street Urban Development Precinct to the south and also include commentary regarding integration with the existing residential area and the future Canning River Public Open Space and foreshore reserve.	
1.1 Introduction. & Purpose Page 4	<i>"Approximately 37 single residential lots at density code of R40;</i> <i>Approximately 252 single residential lots at density code of R60;</i> <i>Approximately 106 single residential lots at density code of R80;</i> <i>Public Open Space (POS) and Regional Open Space (ROS) located adjacent to Canning River; and</i> <i>The accommodation of the existing Bush Forever zoning within the open space."</i> <i>Public Open Space (POS) and Regional Open Space (ROS) located adjacent to Canning River; and</i>	- Remove the sentences with lot yield estimate for R60 and R80 and recalculate lot yield-based on R40 - - To the wording "<i>single residential lots for R40</i>" add grouped dwellings /multiple dwellings. - Provide land areas and per centage of site areas for proposed POS and Foreshore reserve.	- R60 and R80 (high density) is not supported. - To provide greater scope for varied built form and housing typologies. - The POS and Foreshore reserve areas and percentages are to match Table 1 POS Schedule (Page 42) noting issues and modifications in this Schedule will impact POS provision.
Area and Land Use Page 7	<i>"The majority of the lots are primarily cleared of native vegetation, with propose residential density generally higher in closer proximity to the Canning River."</i>	Include commentary regarding remnant vegetation on lots e.g., adjacent Canning River and along boundaries.	To improve understanding of the site.
Table of TPS 4 Schedule 8 Development (Structure Planning Areas) No.44 provisions Page 11	Solar access has been considered in the design of the local structure plan. Particularly, future development density increases as the AHD of the site slopes down. This has been done in order to ensure all lots enjoy as much sunshine as possible throughout the day.	Provide commentary based on LN policy Element 3 lot layout. Street and lot orientation north-south-east-west orientation is a better description.	To better clarify appropriate lot layout for solar access.

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Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
Table of TPS 4 Schedule 8 No.44 provisions Page 11	<i>"The Local Water Management Strategy at Appendix C provides management detail for Foreshore Management. Importantly, the development of the foreshore reserve was informed by consultation involving WAPC, EPA, DWER, DBCA and the City of Armadale by Bayley Environmental Services."</i>	No foreshore management details are provided in Appendix C – LWMS. Provide evidence of consultation/ agreement of foreshore management with relevant agencies or remove the statement.	The statement is not supported by evidence. Refer to comments below under LWMS, a foreshore management plan is required.
2.3 City of Armadale Planning Policies PLN 2.4 Page 14	<i>"The Plan at Figure 6 demonstrates areas where trees are to be retained, and areas where trees are to be removed. In short, the portion of POS will retain all existing vegetation, while the trees in areas identified for Residential zones will be subject to tree removal."</i>	The figure should detail a line (POS boundary) to show which trees are proposed to be retained and which are to be removed and/or indicate number of trees to be removed and retained.	Figure 6 does not show areas of POS/Urban development so not possible to visualise/understand trees to be removed/retained
2.4 WAPC Planning Documents – Development Control Policy DC 1.6, 4.3 Kelmscott District Centre & Train Station Catchment & 5.3.1 Land Use and Residential Density - Pages 16, 33 & 37	Housing densities R40, R60 and R80 based on the nominal catchment of DC1.6	Revise the commentary in these sections to provide other justifications for the densities proposed other than the area being within the 800 metres radial distance from the Kelmscott Trian Station (refer to agenda report – Analysis – Density and Built Form).	The densities proposed have been justified based on the nominal 800 metres radial catchment from the Kelmscott Trian Station however DC1.6 indicates the walkable catchment along roads/paths for assessing relevant applications i.e., structure plans. A walking catchment analysis by the City indicates that the structure plan area is greater than 800 metres from the Kelmscott train station.
Water Sensitive Design (PLN 2.6) Page 16	All text	Provide more detail commentary on how the LWMS achieves the requirements of PLN 2.6, i.e., include reference to the LWMS (as revised) and/or Flora Vegetation/Black Cockatoo assessment as appropriate.	Text commentary generally repeats statements of PLN 2.6 but does not state how the structure plan achieves compliance with PLN 2.6.

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Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
State Planning Policy 2.10 Swan Canning River System Page 19	Applicant Response to 7.4.7, 7.4.12, 7.4.13 and 7.4.15	7.4.7 The provisions are relevant provide a response to each point. 7.4.12 Provide a short response to relevant provisions with reference to relevant Structure Plan technical reports (as revised) 7.4.13 Provide a response to the provision with reference to Structure Plan technical reports where relevant. 7.4.15 Provide a response to the provisions i.e. river linkage corridor also for pedestrian movement & river walks.	The Applicant's response required more detail.
2.6 State Planning Policy 7.0 Design of the Built Environment Page 23	<i>"The road network is legible with clear connections to important features including the future school site and the surrounding road network"</i>	No future school site proposed. Reword to <u>existing</u> school with name to school name (Clifton Hills Primary School).	To correct inaccuracy.
2.7 LN Page 24	<i>"LN outlines that Local Structure Plans should depict:"</i> Followed by 11 dot points	Provide comments in table format against each of the criteria. Include LN policy's Application Requirement Checklist with reference to where information/details are located in Structure Plan report and/or technical reports.	Commentary duplicates provisions of LN policy but does not state or indicate how matters are achieved or where they are addressed in the Structure Plan report and/or technical reports.
3.1 Topography Page 26	Topography text	Provide some detail on levels AHD across the site and degree/percent of slopes, fall across the site.	More detail is required for understanding of the site topography/levels.
3.1 Soil Types Page 26	Soil Types test	Provide reference(s) to relevant sections/page/ plans of LWMS (as revised).	Reference is required for further detail and understanding of soil types.
3.2 Hydrology Page 27	Surface drainage text	Provide a reference to plan(s) in the relevant technical report that details the location and extent of floodway or flood fringe.	A plan reference is required to understand the impact of floodway and flood fringe.
3.2 Hydrology Page 27	Wetlands text	Provide a reference to plan(s) in the relevant technical report (as recommended to be revised) that details wetlands including their location and extent.	To improve understanding regarding the extent of wetlands in the Structure Plan area.
3.4 Bushfire Hazard Level Page 28	Reference to Bushfire Management Plan (BMP) in appendix	Include summary discussion of pre-development vegetation classification and bushfire hazard level impacting the	The section lacks detailed explanation of existing bushfire situation.

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		structure plan area and major influencing factors as identified in the BMP (as recommended to be revised).	
3.5 Vegetation Figure 6 Page 29	<i>"Figure 6 indicates the trees to be retained within the ROS and POS"</i>	As Figure 6 is from the Environmental Assessment Report it does not deal with Regional Open Space (ROS) and Public Open Space (POS). Clarify that ROS was not included in the survey. Identify the number of trees (including habitat trees) that can be retained in POS include whether trees with hollows for potential Black Cockatoo breeding are located in POS. Detail the number of trees that would be removed in accordance with revised technical reports. Provide commentary that further tree retention can be considered in subdivision proposals in road verge areas and group housing sites noting that site works would be a factor impacting whether trees can be retained outside proposed POS and ROS.	Figure 6 does not show trees to be retained in ROS (foreshore reserve) and POS.
4.2 Bush forever Page 32	<i>"Examination of the Bush Forever area on Lot 12 identified the presence of an existing seasonal linear swale, running from south-east to north-west and discharging into the Canning River"</i>	Clarify what the swale is associated with i.e., drainage on Lot 12 southern boundary?	To improve understanding of structure plan area features.
4.5 Southern and Northern interfaces Page 34	northern interface text	Revise text to comment that the rural land to the north is identified as an Urban Investigation Area in the <i>Southeast Metropolitan and Peel Sub-regional Structure Plan, 2018</i> . Consider and provide commentary and recommendations for Structure Plan interface to Brookside Avenue.	The Section needs to consider WAPC regional planning and the Structure Plan interface to Brookside Avenue.
4.8 New Roads Page 36	Turner/Brookside pedestrian bridge discussion	Revise commentary based on outcomes of a revised TIA's consideration of any requirements for road and bridge upgrades on Scenario 3 traffic assessment. Refer to TIA issues/ modifications below.	TPS4 Schedule 8 Development (Structure Plan) Areas for Development Area No.44 Provision h) indicates the structure plan is to consider servicing and infrastructure requirements including any requirements for road and bridge upgrades to provide access to the additional residential development and to manage local traffic.

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Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
5.3 Residential and sub-clauses Pages 37-39	R60 and R80	Remove commentary on R60 and R80 and reword paragraphs as appropriate.	R60 and R80 (a high density under the R Codes) is not supported as the Structure Plan area it outside the 800m walking distance to the Kelmscott train station under WAPC's Development Control Policy 1.6 – Planning to Support Transit Use and Transit Oriented Development.
5.3.2 Lot Layout Page 38	Lot Layout text	- Revise text commentary to address relevant LN policy information requirements (Refer to Page 14 of LN policy) - Revise dwelling yield based on R40. - Compare proposed density with target density of State Planning Frameworks.	- The section needs to address LN policy information requirements. - Lot yield requires revision due to R60 and R80 not being supported. - To improve understanding of target and proposed density.
5.4 Movement Network Page 39-40	Clifton Road	Change Clifton Road to Clifton Street (and throughout the documents)	Correct inaccuracy
5.4.1 Regional Road Network Page 39	<i>"Clifton Road functions as a regional distributor"</i>	Refer to TIA (as revised) for correct classification of Clifton Street (should be discussed under heading 5.4.2 Local Road Network)	Correct inaccuracy.
5.4.2 Local Road Network Page 9	Local Road Network discussion	Clifton St and Brookside Ave require more commentary i.e., reserve and carriage way widths, pedestrian amenities and needs for upgrades/improvements including local area traffic management and recommendations of the TIA (as revised) for additional information see below.	Insufficient detail.
5.4.3 Road Widths Page 39	Road widths text	Remove-commentary regarding road/laneway widths determined at subdivision plan stage. Revise commentary to include discussion of road reserve and pavement widths including cross sections base of TIA (as revised) and LN policy.	Insufficient detail. Should not be deferred to subdivision stage.
5.4.4 Intersections Page 40	Intersection discussion	- 4-way intersections are to be roundabouts not priority controlled unless otherwise justified in a revised TIA.	- A roundabout on Clifton St/Tara Way is required to calm traffic of Clifton St.

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Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		- TIA (as revised) to consider sight line issue of Clifton St/ Brookside Ave intersection and provide recommendations.	- A sightline issue at the intersection of Clifton St/ Brookside Ave needs to be resolved in a revised TIA.
5.4.5 Public Transport Page 40	Public Transport text	Kelmscott train station is not the nearest Public Transport route; bus routes are closer. Provide commentary on bus routes servicing the locality including route numbers, service areas and frequency as well as the train service.	Corrections and additional detail are required.
5.4.5 Pedestrian and Cycle Network Page 40	Pedestrian and Cycle Network text	Include commentary that a shared use path is required on the west side of Clifton Street and south side of Brookside Avenue to connect to the shared path further south on Clifton Street same side of the road. Include commentary that footpaths on internal subdivision roads are required and consider an east-west shared path linkage through the structure lane area from Clifton Street to POS perimeter road/shared path.	Insufficient detail.
5.4.7 Proposed Movement Network Page 40	Proposed Movement Network text	Provide a summary commentary of proposed movement network and updated text commentary in accordance with a TIA (as revised).	Insufficient detail and update required in accordance with revised TIA.
5.4.8 Proposed Movement Capacity Page 40	Proposed Movement Capacity text	Delete reference to retirement village Updated text in accordance with a TIA (as revised).	Update required in accordance with revised TIA.
5.5 Public Open Space Page 41	Public Open Space text	POS text modifications as required to address the modification to POS discussed above under heading Structure Plan Map.	The proposed POS provision is not acceptable to City and DBCA.
5.5 Public Open Space Page 42-43	Table 1 and Figure 7	Resolve the inconsistency between Table 1 and Figure 7 restricted open space, 1:1 ARI and LWMS surface area and calculations in the Shawmac Drainage Report which are larger areas, noting POS/drainage provision will be impacted by matters identified above under heading Structure Plan Map and in the LWMS (as recommended to be revised).	To resolve inconsistency in information (Drainage Report and LWMS)

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5.5 Public Open Space Page 42-43	5.5 Figure 7 – POS calculation per lot (table)	Detail in table to include: - the site area of all the lots. - the area of POS per lot restricted & unrestricted and percentages. - This Table maybe relocated from Figure 7 to-Section 5.5. Open Space, with appropriate commentary. - Note: POS/drainage provision will be impacted by matters identified to be addressed in the Structure Plan Map and LWMS (as revised).	To provide greater clarity on POS contributions of landowners.
5.6.1 Local Development Plans Page 44	<i>"- All dwellings on lots/development sites directing abutting public open space areas shall be designed to orientate towards and provide surveillance of public open space areas.</i> - <i>Visually permeable fencing shall be provided at the boundary between lots/development sites and public open space areas.</i> - <i>Some visitor parking may be able to be provided offsite within public road reserves, to the satisfaction of the City of Armadale"</i>	Remove statements	The residential cells do not directly abut public open space. Developments requiring visitor bays will be required to accommodate visitor parking on development sites in accordance with R-Codes. On-street parking will be determined at subdivision and civil design stage.
5.6.2 Minimum 2 Storey Building Height Page 44-45	<i>"second level above the ground floor level must be provided to comply with the minimum building height requirement of the LSP. This may be in the form of a full additional storey(s) and/or via the addition of a loft. Where provided, lofts should contribute to the presence of the built form to the surrounding public realm. This can be achieved via the provision of windows, balconies and/or other architectural and design elements."</i>	Revise commentary to remove reference to use of lofts to achieve 2 storey outcomes.	To provide a consistent approach to building height. across structure plan areas. The use of lofts to satisfy the 2-storey height requirement was not provided for in the City's recommendation on the Canning River Clifton Street (South) Precinct Structure Plan.

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5.8 Heritage Page 45	<i>"Although outside of the LSP area, a Registered Aboriginal Heritage Site (3538) is located on the Canning River and foreshore to the west of the site. The Canning River is also identified by the Heritage Council as a Historic heritage Place (P17887)."</i>	Provide subheadings Aboriginal Heritage and European Heritage. Revise text commentary to accurately reflect the impact of Aboriginal heritage site (3538) and heritage place 18987 on the structure plan area. Confirm the extent of these heritage places is confined to the proposed foreshore area or otherwise. Provide a plan of these heritage sites superimposed on the Structure Plan Map for clarity utilising DPLH Aboriginal Heritage Inquiry System and Heritage Council InHerit online services for site mapping information. Address the advice of the DPLH – Aboriginal Heritage submission.	Detailed commentary and acknowledgement of Aboriginal Heritage and Swan Canning River Park heritage sites is required in the Structure Plan report.
5.9 Bushfire Management Page 45-46	Text (detail/discussion)	The commentary does not reflect the outcomes of the Bushfire Management Plan (BMP) i.e., bushfire hazard associated with the river vegetation and bushfire management in the Structure Plan area to achieve compliance with the bushfire protection criteria of <i>SPP7.3 Planning for Bushfire Guidelines</i> . The commentary in this section is be updated to address the City's and Department of Fire and Emergency Services' issues and modifications required in a revised BMP.	The commentary is general and lacks specific detail how bushfire is managed in the Structure Plan area.
Appendix B - Bushfire Management Plan No. 32 Brookside Avenue and Nos. 1, 15, 17 and 27 Clifton Street Kelmscott, October 2022			
Exec. Summary & Figure EX1	10.5m street setback/asset protection zone (APZ)	The Structure Plan Map/BMP should achieve/demonstrate the Bushfire Protection Criteria of <i>SPP7.3 Planning for Bushfire Guidelines</i> (SPP 3.7 Guidelines) Elements: location and, siting and design which indicate residential lots should achieve BAL 29 or below through alternative design and bushfire management approaches than proposed.	The proposed 10.5m setback includes BAL FZ to BAL40. These BAL rating are inconsistent with the Bushfire Protection Criteria elements location and siting and design of SPP 3.7 Guidelines. The proposal to restrict development in a 10.5m wide section of residential areas fronting the POS sterilizes a significant portion of residential land. The BMP needs to be revised to provide alternative design and bushfire management responses to achieve an acceptable BAL rating i.e., BAL 29 or less.

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Exec. Summary Page 32 Residual Risk Table 2 BF Protection Criteria	12m perimeter road	The perimeter road reserve width should be based on TIA with reference to LN and with consideration of a possible wider road with on-street parking and the shared path which may be used for APZ purposes.	The perimeter road width does not comply with LN policy. A wider road can contribute to a wider APZ to residential areas.
Page 26 Fig 5a: Bal Contour Current Vegetation	Title Figure 5a - BAL Contour Current Vegetation	The title of the Figure 5a should reflect the information on the plan i.e. Post Development BAL Contours.	Figure 5a depicts post development BAL contours not current vegetation as titled.
Exec Summary – 5.0 Page 27 - Figure 5B Page 32 Residual Risk Page 35 - Table 2 BMP Strategies	public open space management options (4m or 6m) Figures 5b illustrate the required management extent (6m) to achieve BAL 29 at 4.5 m from the street in development blocks.	Revise the BMP to remove irrigate lawn/ parkland as part of the APZ and public open space management options (4m or 6m).	SPP 3.7 Guidelines indicates new POS and urban water management areas should not be excluded as low threat vegetation unless prior agreement of the City is obtained and information included in the BMP. The City has not agreed to manage the POS as low threat status because in summer the use of mowers may be prohibited due to risk of igniting a fire so the vegetation cannot be consider as managed all year round. LWMS section 4.6 Page 26 indicates densely vegetated basins for water quality management which would likely compromise their function as part on an APZ. DBCA – Rivers and Estuaries Branch recommended rehabilitation of Bush Forever/CCW and does not support these areas for use as an APZ.
Exec Summary – 5.0 Page 27 - Figure 5B Page 32 Residual Risk Page 35 - Table 2 BMP Strategies	Development cells (R60 and R80) are impacted by BAL FZ to BAL40.	The Structure Plan Map/BMP should achieve/demonstrate the Bushfire Protection Criteria of SPP 3.7 Guidelines elements: location and, siting and design which indicate proposals should achieve BAL 29 or below. A revised BMP that uses a combination of wider POS perimeter road (including parking bays, shared path) adjacent to the POS may be appropriate design management responses.	The Structure Plan does not meet the Bushfire Protection Criteria – Element 1 location and Element 2 – Siting and Design. Proposed R60 and R80 development cells are impacted by BAL FZ to BAL40 contrary to SPP

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			3.7 Guidelines elements: location and, sitting and design.
Exec Summary – 5.0 Page 34 Table 2	<i>“The Canning River corridor forest (extreme BHL) is a localised element and not reflective of a broader condition.”</i>	Revise the BMP to provide policy justification for localised element statement and impact if any, to the BAL assessment compliance with bushfire protection criteria.	No discussion is provided on the exact meaning of the term localised element statement and how it impacts the BMP.
Page 81 of 445 – Table 1	Table 1 of the BMP states: • No CCW or buffer applicable to the land. • No threatened and priority fauna • No threatened ecological communities • No Environmentally Sensitive Areas.	The BMP should acknowledge and address CCW in the Structure Plan area and that the site is within an Environmental Sensitive Area designation. A revised BMP will be required based on a POS outcome in accordance with the principles detailed under Structure Plan Map above.	The Structure Plan area is impacted by CCW and is identified as an Environmentally Sensitive Area.
6 Direction for Implement and Management Measure at Subdivision	Bushfire protection measures as detailed. Notation 2	The BMP should include information/ commentary that subdivisions will require BMPs and stages will be required to achieve bushfire protection criteria of the SPP 3.7. Delete Notation 2 – lots required not to be subject to rating > BAL29.	For added clarity and to meet the bushfire protection criteria of SPP 3.7 Planning for Bushfire Guidelines.
Appendix C Local Water Management Strategy; Version: CLIFTON STREET NORTH PRECINCT LOTS 1, 11 & 12 CLIFTON ST AND LOTS 11 & 12 BROOKSIDE AVE, KELMSCOTT LOCAL WATER MANAGEMENT STRATEGY Report No. J14037 3 October 2022			
Pag I -iii) Executive Summary	<i>“Runoff from building roofs will be piped to detention basins, bypassing the road drainage network and thus avoiding contamination. The option exists to bypass these flows past the detention basins, thus reducing the required size of the basins while at the same time increasing the quantity of small, clean flows to the Canning River. This option will be explored further at the UWMP stage”</i>	The City does not support a separate piped drainage system to deliver roof run-off to drainage basins directly. The LWMS should be modified to provide for appropriate earthworks and/or fill to facilitate at sources stormwater infiltration and detention on future lots with overflow connection to street drainage network and further detention down-stream in basins in the POS.	A dual pipe system for roof runoff and street drainage is considered impractical and would be an additional maintenance burden to the City. The City favours a combination of earthworks/fill and lot infiltration storage with overflow connections to street drainage and detention down-stream in basins in the POS outside CCW/Bush Forever land.
Page 19-26 4.0 Stormwater Management	Page 11 2.3.1 Surface Drainage states: <i>“One constructed drainage line flows along the southern boundary of Lot 12 Clifton St and then across the western part of the lot, carrying street drainage from Clifton St into the river via a combination</i>	The LWMS should address stormwater methodology and management of the existing drainage/ stormwater on and entering to Lot 12 Clifton Street including a rerouting strategy as appropriate.	4.0 Stormwater Management does not include methodology and management of existing drainage/stormwater on and entering to Lot 12 Clifton Street from the residential area to the east.

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	<i>of underground pipe and open channel flow. Runoff from private lots within the project area currently flows overland to the river."</i>		
Page I -iii) Executive Summary Page 19-26 4.0 Stormwater Management Figure 5 & 6	LWMS proposes 6 scattered treatment/ detention basins to service 4 catchments. "4.4 Basin Location <i>The development plan has been configured to provide all but one of the existing lots with their own catchment and bioretention basin, so as to allow each lot to be subdivided and developed independently of the other lots. The exception is Lot 11 Brookside Avenue, which ultimately will drain into the basin on Lot 11 Clifton Street but in the short term may be served if necessary by a temporary basin within its own boundary."</i>	The LWMS should be modified to reduce number of catchments and/or treatment detention basins having regard to the current land ownership (only 3 landowners).	Lot 12 Brookside and Lots 11 and 12 Clifton Street are under the same ownership. This provides opportunity to rationalise catchments and basins. Small, scattered drainage basins as proposed would be more of a maintenance burden to the City than a single/or fewer number of basins.
Pag I -iii) Executive Summary Page 19-26 4.0 Stormwater Management Figure 5 & 6	Page 22 4.3 Drainage Management System states: " <i>A number of alternative designs exist that have the potential to reduce the reliance on piped drainage. These include:</i> <i>replacement of some or all piped drainage and/or bioretention basins with vegetated swales in medians or road verges;</i> <i>increased in-lot storage of roof runoff;</i> <i>and</i> <i>increasing flow rates to the Canning River.</i> <i>These alternatives were considered during the preliminary drainage design phase but were found to be constrained by the site</i>	LWMS should be modified to identify the primary drainage strategy for the LSP area including proposal to address lot infiltration issues. A combination of earthworks/ fill with lot infiltration and detention/storage with overflow to connection to street drainage and detention further downstream in the POS are preferred.	The LWMS is to provide a clear direction on the proposed drainage strategy. It is not acceptable to further explore options at subdivision/UWMP stage.

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	<i>characteristics. They will require further examination during the detailed design of each stage of subdivision before they can be considered for adoption in place of, or as well as, the preliminary design."</i>		
Table 4.1	Constructed Wetlands not proposed.	Revise the LWMS to acknowledge that portion of the POS is a CCW and that proposals to revegetate should recreate the reference ecosystem of the CCW.	Portion of the POS is classified CCW.
Page 5 – 1.4.3 Page 17, 26 and 27	<i>"re-vegetating existing stormwater drains with local species to enhance their values and visual appeal."</i>	Revise the LWMS to state that revegetation will be consistent with the Monash University <i>Vegetation Guidelines for stormwater biofilters in the south-west of Western Australia</i> which outlines the biodiversity and hydraulic benefits.	The Guidelines are utilised by the City as a guide to revegetation.
Pages iii and 31	<i>"Foreshore Management Plans will be prepared to guide rehabilitation and management in the foreshore area adjacent to each stage of subdivision."</i> <i>Details of rehabilitation and landscaping in the foreshore area will be provided in the Foreshore Management Plan that will be required prior to any subdivision."</i>	Revise the LWMS to provide more detail on foreshore management based on a separate foreshore management plan and provide a summary of the foreshore management plan in the Structure Plan report – Part 2.	Insufficient detail is provided on foreshore management. A foreshore management plan is required to be prepared as part of the structure plan and to align with other relevant technical studies (i.e., LWMS, BMP Landscape Plan, Structure Plan Map) and as a guiding document for subsequent planning stages (i.e., subdivision). The structure plan report Page 11 stated that the LWMS at Appendix C provides management detail for Foreshore Management. <i>"Importantly, the development of the foreshore reserve was informed by consultation involving WAPC, EPA, DWER, DBCA and the City of Armadale."</i> In the absence of details on foreshore management this statement is inaccurate.
Page 30 -31 Landscape Strategy	<i>"New plantings in the foreshore, adjacent POS and verge trees may, if necessary, be irrigated by tanker or temporary drip lines during the first two summers after establishment, although the clay soils of</i>	Revise the LWMS to state that the City requires bore water from a new bore for irrigation. The LWMS is to identify the need for suitable bore location to be found to service landscaping.	The City requires irrigation of landscaped areas to be via bore which has a separate ground water licence allocated. The City will not accept scheme water or use of one of its existing bores due to

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	<i>the site may make this irrigation unnecessary. If required, the water source for this irrigation may be the Water Corporation scheme or one of the existing City of Armadale bores in the project area. After two years this irrigation will cease but drip lines may be left in place in case needed for infill planting."</i>		current and future pressures on ground water allocations.
Page 30 -31 Landscape Strategy	<i>"Other water-saving landscaping to be adopted include the following: Irrigation will be by means of large droplet emitters or trickle irrigation where applicable."</i>	Revise the LWMS to include wording to reflect that irrigation will be to the City's irrigation specification.	Irrigation is required be to City of Armadale specification.
Pages 22 to 27 4.3 Drainage Management System and Figures 5 & 6 7.2 Tree Protection	Basins constructed on land designated as CCW and Bush Forever.	Revise the LWMS to remove basins from the CCW/Bush Forever. Include details on construction, access (slope) and maintenance (including safety) of basins. The LWMS should clarify the extent or area of disturbance around the basins due to construction activities.	Access to and around basins for construction and ongoing maintenance including maximum grades has not been addressed.
Pages 22 to 27 4.3 Drainage Management System Figure 5, 6 & 7	Basin Sizing and Design	Revise the LWMS to provide information on side slopes of basins.	No detail is provided on grades of side slopes of basins to determine whether basins can be credited towards POS.
Figure 6	Catchment 3 Basin Layout	Northern basin is impact by the 100 yr ARI river flooding event and site 100yr flooding event. Clarify how this would impact the function of the basin; would it require relocation, noting the Basins in CCW/Bush Forever are not accepted.	More justification/consideration of basin design required.
Appendix D Transport Impact Assessment; Version: Transport Impact Assessment Clifton Street North Local Structure Plan CW1199700/304900223, 24 June 2022			
TIA (all)	TIA format as proposed	Revise the TIA to address all of the relevant requirements of (WAPC) <i>Transport Impact Assessment Guidelines Volume 2</i>	Structure Plan is required to address relevant WAPC policy requirements.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		– <i>Planning Schemes, Structure Plans & Activity Centre Plans</i> (2016). Including but not necessarily limited to the matters below.	
1.2 Site Context	Figure 1-1 LPS Location	Revise the TIA to show Figure 1-1	Figure 1-1 is not shown.
2.1 Surrounding Land Uses	<i>"The Site is surrounded by Residential land uses to the east and Rural Living to the north."</i>	Revise the TIA to adequately describe existing land uses within 800m radius of the structure plan area. i.e., river, Kelmscott commercial centre including train station/bus interchange, primary school, Albany Highway etc.	The TIA does not adequately describe-the surrounding land uses as per the City comments in the City Issues and Modifications column.
2.3 Existing Traffic Flows	Brookside Avenue & Clifton Street 2017	Revise the TIA to adequately describe existing traffic flows on roads within 2 km of the structure plan area i.e., include Gilwell Ave, Page Rd, Albany Hwy and Clifton St South of Gillwell Ave.	The TIA does not adequately describe the surrounding existing traffic flows on roads within 2km.-as per the City's comments. in the City Issues and Modifications column.
2.6 Existing Crash data	2.6 crash assessment along Clifton Street only.	Revise the TIA to provide crash assessment for the mid-block sections (if available) and intersections covered in Section 5 (i.e. Albany Hwy/Page Rd intersection, Albany Hwy/Gilwell Ave intersection, Gilwell Ave mid-block and Gilwell Av/Page Rd roundabout).	Section 5 provides assessment of the road network including major intersections along Clifton St and Albany Hwy however section 2.6 only provides crash assessment along Clifton Street.
3 Proposed Development	Figure 3-1	Figure 3-1 should detail the most up to date version of the structure plan (including other updates to address issue/matters of this table) as well as submissions of government agencies and utility (service) providers.	Figure 3-1 depicts the previous version of structure plan.
3 Proposed Development	proposed internal road network - 6 new internal roads.	The TIA should adequately describe the proposed internal road network including: - road reservation widths - road hierarchy based of LN policy speed limits - road cross-sections (for example, two lane or four lane, and also show pedestrian, cycling and/or public transport facilities) - the requirement in LN for laneways for medium high density lots.	(WAPC) <i>Transport Impact Assessment Guidelines Volume 2 – Planning Schemes, Structure Plans & Activity Centre Plans</i> (2016) indicates requirement to detail internal road network details
3.2 Access Arrangements	TIA report only indicates one access location from Clifton Street	Revise the TIA to remove any discrepancies i.e., one access location from Clifton Street in TIA and three on Structure	The Structure Plan and TIA need to be consistent. More information and justification must be

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		Plan Map. Note, the City only supports a maximum 2 roads to Clifton Street. Report must clearly demonstrate the following. 1. How are the proposed roads designed to connect with Clifton Street and what intersection treatments are being proposed. 2. Additional truncation (if required) to support the intersection treatments (note: landholdings on the east side of Clifton Street should not be impacted by the need for additional truncations) 3. Proposed 4-way intersection at Tara Place/Clifton Street is not supported without an intersection medication (roundabout)	provided on the Structure Plan's Clifton St interface.
3 Proposed Development	No Local Area Traffic Management (LATM) treatments are proposed along Clifton Street and internal roads	TIA should provide LATM treatments to improve safety by addressing increased traffic and associated speeding behaviour especially on Clifton Street. The preferred LATMs including: • A roundabout treatment at Clifton St/Tara Wy and possibly at the proposed access road (4-way intersection) to improve traffic safety and manage speed. • A roundabout treatment at Clifton St/Butler Pass (currently a T-intersection) to improve traffic safety and manage speed, as well as pedestrian safety to/from the school. (Note: this would also be implemented in structure planning and subdivision for urban development land to the south) • Appropriate intersection treatment at Clifton St/Brookside Ave to improve traffic safety and manage speed around the bend. • A treatment for the 4 way intersections within the structure plan area.	Traffic safety on Clifton St is of concern as it is a long straight road and has records of speeding issues. The applicant should implement LATM treatments to manage speeding behaviour.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		The Applicant should refer to Austroads <i>Guide to Traffic Management Part 8: Local Street Management</i> and Main Roads supplement to this guideline.	
Section 4.2	Improvement to pedestrian/cyclist path network includes shared path along POS interface road only.	Revise the TIA to provide a shared path on the west side of Clifton St (development boundary) to link up with the shared path on Clifton St south of Gilwell Ave and provide pedestrian crossings at suitable spacing (or upgrade existing intersections) along Clifton St (e.g. Clifton St/Tara Wy intersection, Clifton St/Butler Pass intersection and Clifton St midblock between Tara Way and Butler Pass). Footpaths should also be provided on new roads within the Structure Plan area, connecting with the existing/proposed shared path network.	Improvements to the pedestrian and cyclist path network is required in accordance with WAPC's <i>Transport Impact Assessment Guidelines Volume 2</i> Section 10.10.8 Pedestrian/cycle networks and Section 10.9 Safe-walk/cycle to school assessment.
5.2 Key Assumptions	Traffic volume observations and assumptions were made prior to the construction of Denny Avenue link and during COVID period.	Update the traffic data and assumptions given that Denny Avenue Link and COVID are no longer considerations, and a revised dwelling yield-based on R40 only (not R60 and R80). Daily trip generation rate should be updated to 8vpd per dwelling. Differentiation between dwelling types is not supported. More recent traffic data than 2017 should be utilised if available.	The upscale factor used are considered inadequate to compensate for the events given in the report. Given that most site characteristics are now normalized, another traffic count is recommended.
5.3 Development trip generation	Trip generation rates for Single Detached Dwelling and Multifamily Housing (mid-rise)	Revise the vehicle trip generation rate per dwelling as per WAPC Guidelines -(WAPC) <i>Transport Impact Assessment Guidelines Volume 2 – Planning Schemes, Structure Plans & Activity Centre Plans</i> (2016) should be utilised.	The TIA provides no clear demarcation between “Single detached dwellings” and “multifamily housing”. Therefore having 2 different types of trip generation rates are not supported.
Section 5	Proposed development traffic impacting Albany Hwy (State Road) including one signalised intersection (Albany Hwy/Page Rd).	The applicant should seek comments from Main Roads WA regarding expected additional traffic accessing intersections along Albany Hwy including one signalised intersection.	The TIA assessed road intersections in the locality including intersections of Gilwell Ave and Page Road with Albany Highway which is under the control of a Main Roads WA. Main Roads WA input on future traffic volumes to these intersections is required for up-to-date traffic analysis.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
Section 5.7.2	Proposed development traffic impacting on Albany Hwy/Page Rd signalised intersection.	Revise the TIA to review the layout of the Albany Hwy/Page Rd intersection and recommend modifications to the layout to improve safety of the intersection in consultation with Main Roads WA for their approval.	The increase in traffic using the Albany Hwy/Page Rd signalised intersection will cause safety concerns at the following legs: • Page Rd east leg: the additional traffic will cause confusion between LT and RT traffic with the current layout and will lead to safety concerns and increase the chance of crashes. • Albany Hwy south leg: The length of RT pocket is currently approx. 87m only. Pg.25 SIDRA results indicate the 95th percentile queue for this RT during PM peak is expected to get worse and is further beyond the available length (i.e. worse than do nothing).
Section 4 and 5	TIA does not consider structure plan integration with the surrounding Area - proposed changes to land uses within 800 metres.	Revise the TIA to factor in traffic from the urban development of land (lots) immediately south of the structure plan area - Lots 14, 15, 16 and 17 Clifton Street, and the Canning River Clifton Street (South) Precinct Structure Plan area into scenarios (specifically scenario 3) Revise the TIA to factor in the nearby primary school as a major attractor/traffic generator within 800m of the structure plan area. Refer to 10.8 of the WAPC's TIA <i>Transport Impact Assessment Guidelines Volume 2</i>.	WAPC TIA Guidelines Volume 2, 10.8 Integration with surrounding Area, requires: identification of any proposals for major changes to the land uses within 800 metres of the boundaries of the structure plan area.
Section 4 and 5	Scenarios	Revise the TIA to consider the impact of construction of a vehicle bridge connection between Turner Place and Brookside Avenue on Scenario 3 traffic assessment or provide a scenario 4 analysis with the vehicle bridge connection between Turner Place and Brookside Avenue.	TPS 4 Schedule 8 Development (Structure Plan) Areas for Development Area No 44 Provision h) indicates the structure plan is to consider servicing and infrastructure requirements including any requirements for road and bridge upgrades to provide access to the additional residential development and to manage local traffic.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
Appendix F Mosquito Management Plan; Version: Mosquito Management Plan Clifton Street North Precinct (Lots 1, 11 and 12 Clifton Street and Lots 11 & 12 Brookside Avenue), Kelmscott 2 May 2023			
4.6 Management Actions	Table 4.1 Management Action: <i>"Implement chemical control measures in consultation with CoA if monitoring of physical control measures shows chemical control is required"</i>	Revise text with the red text <i>"Implement chemical control measures in consultation with CoA"</i> • if monitoring of physical control measures shows chemical control is required OR • if requested by CoA"	Chemical control measures may be required in additional circumstances, CoA requests the wording be amended slightly, to include <i>"or on request of CoA"</i> .
4.6 Management Actions	Table 4.1 Mosquito Management Actions: <i>"For two years post completion of development, and following inspection and exceeds specified monitoring targets (refer to Table 5.1)"</i>	Revise text with the red text: <i>"during construction/development and for two years post completion of development, and following inspection and exceeds specified monitoring targets (refer to Table 5.1)"</i>	Wording needs to cover the period of construction and post development.
6. Contingency Actions	Table 6.1 <i>"Reasonable residents' complaints are received on the volume of midges within the Project Area."</i>	Revise text with the red text <i>"Reasonable residents' complaints are received on the volume of midges / mosquitos within the Project Area or at the request of CoA"</i>	Wording to be updated, to specify that mosquito monitoring will be undertaken in response to resident complaints OR as the request of the City.
6. Contingency Actions	Table 6.1 <i>"Undertake mosquito monitoring at a selected monitoring location (monitoring locations to be finalised prior to construction), as per Section 5."</i>	Revise text with the red text: <i>"Undertake mosquito monitoring at a selected monitoring locations. Should more than 50 adult mosquitos be caught in an overnight trap, the breeding habitat will be investigated and treated (monitoring locations to be finalised prior to construction, as per Section 5.)"</i>	Table 6.1 mosquito monitoring / trapping is mentioned in response to complaints but lacks specific detail. A recommended trigger for mosquito monitoring. e.g., if more than 50 adults mosquitos.
7. Reporting	Row 2 of table 6.1, discusses the situation/ trigger which would result in mosquito monitoring. The timing advises <i>"May to August: monthly inspection. September to April: fortnightly inspection (while water is present)."</i>	Revise text with the red text to cover additional circumstances: <i>"May to August: monthly inspection. September to April: fortnightly inspection (while water is present) or as required by the CoA."</i>	Additional inspections to cover additional circumstances i.e., mosquito/midge complaints by residents.
7. Reporting	The proposal indicates that a summary report will be provided at the conclusion of the 2 year post development period.	Revise the mosquito management plan to provide for quarterly reports as a minimum detailing incident/complaint and investigation/mosquito monitoring.	More regular reporting will allow for greater understanding of any mosquito issues requiring corrective action.

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
7. Reporting	<i>"Remedial works undertaken from midge control, including time estimates of works carried out and documentation of all chemical treatments for larvae"</i>	Revise text with the red text: <i>"Remedial works undertaken from midge and mosquito control, including time estimates of works carried out and documentation of all chemical treatments for larvae"</i>	Consistency
Appendix G Flora, Vegetation & black Cockatoo Assessment; Version: LOTS 1, 11 & 12 CLIFTON ST AND 11 & 12 BROOKSIDE AVE, KELMSCOTT Flora, Vegetation and Black Cockatoo Assessment			
4.3 Fauna	The field survey determined that there were no intact vegetation and hence it can be concluded that there was no suitable habitat for ground dwelling fauna species.	Provide a Report Addendum to detail a future requirement to implement a Fauna Management and Relocation Plan which should also be addressed in the body of the Structure Plan report (section 3.5), and recommendation that a fauna survey be undertaken and all trees inspected prior to groundbreaking works' stage with a spotter on site.	The report identifies scats and scratch marks around smaller tree hollows. In addition, there are recordings in the immediate vicinity of conservation category species, Quenda. Likelihood of the river providing a habitat movement corridor is noted and should be considered prior to any construction works taking place.
Appendix H Statement Relating to location of Drainage Basins; Version: Statement relating to the location of Drainage Basins (EDS Environmental) Clifton Street North Precinct – Environmental Justification Memo – May 2023			
Memorandum	<i>"Representatives from both DBCA and WAPC were advised of the locations during site visits. No objections or concerns have been raised."</i>	The Memorandum should provide evidence to support the claim the DBCA and WAPC were advised of the basin's locations during site visits and had no concerns.	The DBCA – Rivers and Estuaries Branch has objected to the Structure Plan including basins in the CCW/Bush Forever land and lack of a buffer. Prior written evidence and/or detailed information of agreements or understandings reached with the DBCA and/or WAPC would assist in resolving the DBCA's current position. If no evidence is provided the statement should be removed.
Memorandum	<i>"Basins have been located to avoid large trees that may provide habitat for black cockatoos"</i>	The Memorandum should clarify the extent or area of disturbance around the basins that would occur during construction activities including initial and ongoing access.	Construction of basins will likely require use of earth moving equipment and disturbance of land adjacent to the basins' locations and in accessing the area at construction stage and for ongoing maintenance.
Appendix I Landscape Plan; Version: Landscaping Plan (Harley Dykstra)			
Landscape Plan	Wetland Revegetation	Revise the Landscape Plan to indicate that CCW/Bush Forever areas are to be revegetated to their reference ecosystem class – Forest, to a self-managed state. The	- To ensure appropriate revegetation of the CCW/Bush Forever. Revegetation should restore the environmental values of the Bush

Schedule of Issues and Modifications Proposed Structure Plan – Canning River Clifton Street (North) Structure Plan			
Issue/Section Reference	Applicant's Proposal	City of Issue/Modification	Justification
		species listed on the Landscape Plan should reflect the reference ecosystem of Bush Forever/CCW. Revise the Landscape Plan to be consistent with the Structure Plan Map, LWMS, Bushfire Management Plan and a Foreshore Management Plan acceptable to the City and DBCA – Rivers and Estuaries Branch.	Forever/CCW land to their original vegetation ecosystems as far as practicable. - The Structure Plan's various plans need to be consistent.
Landscape Plan	Managed Landscape	Revise the Landscape Plan to provide an area for a small pocket park subject to site and development constraints i.e., CCW, Bush Forever, and local water management, bushfire management functions as negotiated with DBCA – Rivers and Estuaries Branch, WAPC and the City as required. Revise the Landscape Plan to indicate details of irrigated areas of managed turf parkland including a suitable site for a bore.	- The managed landscape area on the plan is dominated by dispersed drainage areas. There is little area for active/passive recreation i.e., open turf/parkland for kick-about or rest areas (a small pocket park) - Clarity required on irrigated areas.
Landscape Plan	<i>"Managed Landscape Planting (0.5m)"</i> <i>"Wetland Revegetation (0.5m-2.m)"</i>	The Landscape Plan should provide clarification of the meaning of these statements/numbers. The City's minimum plant density standards should be reflected in a Landscape Plan, Foreshore Management Plan and LWMS.	The meaning of these statements/numbers is not clear. Are they plant densities, widths of plantings?
Landscape Plan	Hard landscaping elements – including shared path	The Landscape Plan should identify hard landscape elements with regards to recreation needs of the community (existing and future) e.g., lighting, dog bags, drinking fountains, seating, shade structures, play equipment and City access to drainage basins. The Structure Plan Report Part 2 should include a section on the Landscaping Plan and its elements.	Hard landscaping element should-consider the recreation needs of the community (existing and proposed) and site context including constraints and opportunities – Bush Forever and CCW and floodway/fringe mapping.



LOCAL STRUCTURE PLAN

Clifton Street North Precinct,
KELMSCOTT

Plan No. | 20233-09

Date | 29/05/25

Drawn | NP

Checked | MB

Revision | J

PERTH & FORRESDALE:

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Scale | 1:1500@A3

0 20m 40m

NOTE: This plan has been prepared for planning purposes. Areas, Contours and Dimensions shown are subject to survey

Harley Dykstra

PLANNING & SURVEY SOLUTIONS



AERIAL PHOTOGRAPH

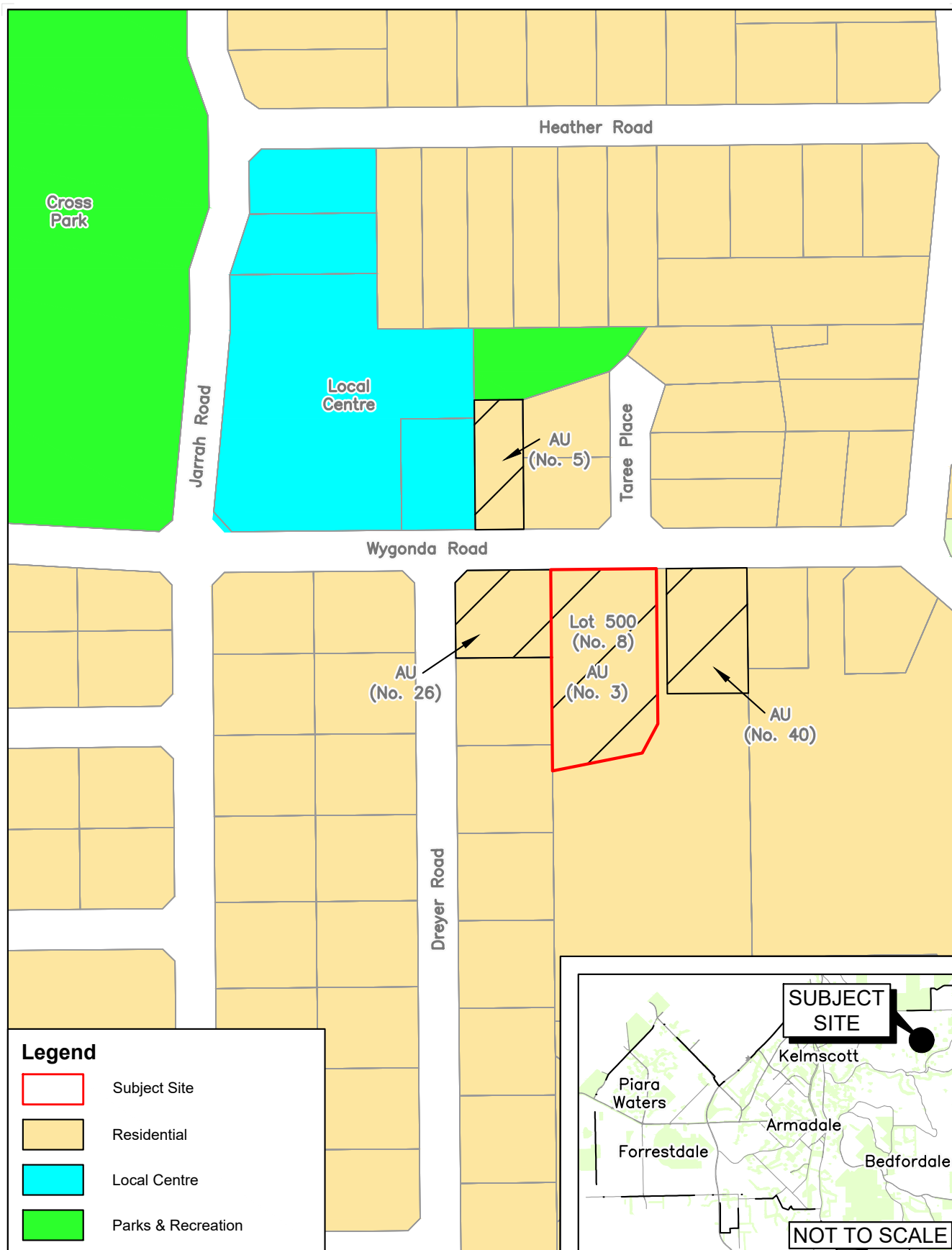
Lot 500 (No. 8) Wygonda Road, Roleystone



SCALE 1 : 3500

Legend

Subject Site



NO.	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	COMMENT/RECOMMENDATION
1. CE/91356/25	Object	Adding a church into a shopping area will not benefit the community.	1.1 The land use is a discretionary 'A' use in Residential zone, and therefore capable of consideration on the subject site.
2. CE/91358/25	Object	Traffic will impact our street.	2.1 Traffic matters are addressed through TIS, which identifies that the road network is capable of accommodating the vehicle volumes proposed. The context of the subject site in proximity to the Roleystone Shopping Centre and other non-residential land uses is also a relevant consideration.
3. CE/91360/25	Object	Even though there are parking bays in the plan this will probably spill over onto the street.	3.1 Parking concerns have been addressed by the applicant who has redesigned the site plan to provide sufficient parking as per TPS4 Schedule 7A and TIS. Parking management is capable of being addressed through conditions of approval
4. CE/91362/25	Object	Lack of parking and the potential to bring troubled youths.	4.1 See 3.1 above. 4.2 The City's Local Planning Policy – <i>Designing Out Crime</i> (PLN 3.14) guides effective design of building and plans using Crime Prevention Through Environmental Design principles which assist with reducing crime and the opportunity for such activities. The policy provides guidance in relation to built outcomes that assist in supporting the reduction in actual and perceived crime and anti-social behaviour.
5. CE/91365/25	Object	We have enough places of worship in the area.	See 1.1 above.
6. CE/91369/25	Object	Preservation of community character and cohesion.	See 1.1 above.
7. CE/91371/25	Object	Parking concerns.	See 3.1 above.
8. CE/91373/25	Object	Parking and traffic concerns.	See 2.1 above. See 3.1 above.
9. CE/91375/25	Object	There is not enough parking to cope with the volume of traffic.	See 2.1 above. See 3.1 above.
10. CE/91380/25	Object	There is not enough parking space on the premises to accommodate the number of people attending.	See 3.1 above.

11. CE/91381/25	Object	Alternative land uses would provide greater community benefit and align with broader development needs.	See 1.1 above.
12. CE/91382/25	Object	Traffic issues.	See 2.1 above.
13. CE/91385/25	Object	The scale of the proposed use is not compatible with the amenity of the area. Car doors slamming would severely impact the amenity in the area, particularly for adjoining residents.	See 1.1 above. 13.1: The acoustic report has sufficiently addressed noise concerns with proposed measures to ensure compliance with the <i>Environmental Protection (Noise) Regulations 1997</i> .
14. CE/91386/25	Object	Parking and traffic concerns.	See 2.1 above. See 3.1 above.
15. CE/91389/25	Object	Parking and traffic concerns.	See 2.1 above. See 3.1 above.
16. CE/91391/25	Object	I live around the corner and traffic and parking will be a major issue.	See 2.1 above. See 3.1 above.
17. CE/91393/25	Object	There are always problems with parking in the area for people attending the local markets and parking is inadequate for up to 120 people.	See 3.1 above.
18. CE/91396/25	Object	The area already supports multiple places of worship. Parking provided on site is a concern.	See 1.1 above. See 3.1 above.
19. CE/91399/25	Object	My concern regarding this proposal includes a lack of parking. I feel that surrounding businesses and homes will be impacted by the congestion.	See 2.1 above. See 3.1 above.
20. CE/91410/25	Object	Parking and traffic concerns, and how this land use will benefit the local community.	See 1.1 above. See 2.1 above. See 3.1 above.
21. CE/91449/25	Object	The country club already serves as a social hub for residents. Given the number of attendees likely to frequent the place of worship, there are questions about whether sufficient on-site parking has been planned.	See 1.1 above. See 3.1 above.
22. CE/91452/25	Object	There is already church options in the area, and another church currently being built at the bottom of Brookton Highway.	See 1.1 above.
23. CE/91454/25	Object	There are plenty of places of worship down the hill. Traffic will be impacted on the weekends with football and markets as well.	See 1.1 above. See 2.1 above.

24. CE/91458/25	Object	The centre of Roleystone is not the correct location for a place of worship/church. It is already congested on the weekends with sporting events at the oval and bowls club. Parking could overflow to the shops.	See 1.1 above. See 2.1 above. See 3.1 above.
25. CE/91460/25	Object	Parking is an issue and Roleystone doesn't need a place of worship.	See 1.1 above. See 3.1 above.
26. CE/1467/25	Object	Church is not required in small township.	See 1.1 above.
27. CE/91469/25	Object	There are already 2 other churches in Roleystone. There is no place for cars to park.	See 1.1 above. See 3.1 above.
28. CE/91471/25	Object	Council should prioritise uses that benefit the entire community. Parking is inadequate.	See 1.1 above. See 2.1 above.
29. CE/91472/25	Object	We have enough churches in and around Roleystone. The area of proposal is a residential area that gets congested on weekends with our community sports and markets.	See 1.1 above. See 2.1 above.
30. CE/91475/25	Object	There are already 2+ churches in Roleystone with another 1 + in progress.	See 1.1 above.
31. CE/91477/25	Object	We already have 2 places of worship in Roleystone.	See 1.1 above.
32. CE/91478/25	Object	There is no parking so the street or shopping centre will be overflowing with cars. This site/area is not suited for a place of worship.	See 1.1 above. See 3.1 above.
33. CE/91479/25	Object	There is in no way enough parking at that address. This is a busy road.	See 2.1 above. See 3.1 above.
34. CE/91480/25	Object	Wygonda Road will not cope with the traffic. It's a traffic nightmare at best on a weekends.	See 2.1 above.
35. CE/91484/25	Object	Roleystone's Centre hub is not a safe place to add this much traffic to. The traffic along Brookton Hwy to get to Roleystone already under heavy volume. This kind of extra traffic does not belong in this area.	See 2.1 above.
36. CE/91486/25	Object	Not enough parking. Traffic will come to a stand still at times of worship.	See 2.1 above. See 3.1 above.

37. CE/91488/25	Object	People in the Roleystone area and surrounding would benefit more from a gym than a place of worship.	See 1.1 above.
38. CE/91489/23	Object	The space is not big enough for the proposed number of worshippers and this will impact on local businesses.	See 1.1 above.
39. CE/91492/25	Object	People of Roleystone would benefit from the leisure centre having more activities and fitness facilities such to keep the community active and healthy.	See 1.1 above.
40. CE/91495/25	Object	No comment.	Noted.
41. CE/91496/25	Object	There are already multiple churches representing different faith denominations in Roleystone. There is insufficient parking around this building for this proposal.	See 1.1 above. See 3.1 above.
42. CE/91498/25	Object	There is not enough room to park.	See 3.1 above.
43. CE/91501/25	Object	I am worried about where people will park for church activities.	See 3.1 above.
44. CE/91504/25	Object	The site has insufficient parking which would allow for future growth of worshippers. Traffic flow would be hampered on Wygonda Road. There is no need for this type of usage for a leisure centre site.	See 1.1 above. See 2.1 above. See 3.1 above.
45. CE/91509/25	Object	We don't need any more churches.	See 1.1 above.
46. CE/91511/25	Object	We don't need another church here.	See 1.1 above.
47. CE/91556/25	Object	We don't need a secular group in Roleystone. It will certainly affect community movements with extra cars.	See 1.1 above. See 2.1 above.
48. CE/91565/25	Object	That particular area does not have enough room to support the amount of people visiting the church. Traffic, parking and conflicting noises could be issues with the country club so close.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above.
49. CE/91566/25	Object	There are enough facilities already in place & /or under construction to meet the needs of the religious community.	See 1.1 above.

50. CE/91569/25	Object	There doesn't appear to have adequate onsite parking and we feel it will spill out into other areas. I would also prefer the site remain focused as a potential community asset.	See 1.1 above. See 3.1 above.
51. CE/91626/25	Object	Too much traffic on Wygonda Road and surrounding area which will affect the Roleystone Country Club and nearby residences.	See 2.1 above. See 3.1 above.
52. CE/91636/25	Object	Traffic congestion and street parking is not welcomed. The application is designed for a specific group only.	See 1.1 above. See 2.1 above. See 3.1 above.
53. CE/91662/25	Object	A church will affect the traffic of our community.	See 2.1 above.
54. CE/91664/25	Object	There are already enough worship places in the Roleystone area, with a new one currently being built on Brookton hwy. The road infrastructure is not suitable for a place of worship. We struggle for parking on market days.	See 1.1 above. See 2.1 above. See 3.1 above.
55. CE/91686/25	Object	There are already several places of worship located within close proximity to this site. The volume of traffic is not suitable for Wygonda Road and the surrounding residential streets. Frequent vehicle movement may be suitable in a commercial or mixed-use zone. The proposed car parking will not be enough to accommodate these numbers. Overflow parking will likely spill into neighbouring streets.	See 1.1 above. See 2.1 above. See 3.1 above.
56. CE/91708/25	Object	The church is not required in the area.	See 1.1 above.
57. CE/91725/25	Object	Concerns of lack of parking. The Roleystone Club have music concerts and days on the green which will conflict with the proposed worship days.	See 3.1 above. See 13.1 above.
58. CE/91783/25	Object	This property does not have parking for a church and will spill out to the surrounding areas clogging a busy thoroughfare. This site is better suited for another use.	See 1.1 above. See 2.1 above. See 3.1 above.
59. CE/91812/25	Object	It will cause traffic hazards and extra congestion. This space in its central town location should be kept for recreational facilities.	See 1.1 above. See 2.1 above. See 3.1 above.
60. CE/91829/25	Object	We are concerned about the impact it will have on traffic congestion & dangers involved with so many extra cars moving about the vicinity. There	See 1.1 above. See 2.1 above.

		are already 2 churches in Roleystone with more being built in the neighbouring suburbs. The location should be a place for something recreational.	
61. CE/01864/25	Object	There will be way too many cars/traffic. This centre would be of more use to the community as something else, not another church.	See 1.1 above. See 2.1 above. See 3.1 above.
62. CE/91958/25	Object	To many churches in vicinity. Wygonda Rd already is busy enough with traffic. There is not enough parking for the proposed church.	See 1.1 above. See 2.1 above. See 3.1 above.
63. CE/92041/25	Object	This development may be appropriate for a commercial or high-density area, but not in a quiet residential zone.	See 1.1 above.
64. CE/92045/25	Object	Roleystone already has several places of worship. The parking lot adjoined to the property this application has been submitted for cannot cater for 120 people/vehicles. Increased traffic to the area during the noted times is also less than ideal.	See 1.1 above. See 2.1 above. See 3.1 above.
65. CE/92046/25	Object	This could be perfect space where we could have a local basketball competition.	See 1.1 above.
66. CE/92048/25	Object	Inappropriate for this area. Traffic congestion/parking.	See 1.1 above. See 2.1 above. See 3.1 above.
67. CE/92050/25	Object	The land should remain recreational use by the wider community.	See 1.1 above.
68. CE/92051/25	Object	There is already multiple places of worship and another is not needed. It should be used for either recreational or retail.	See 1.1 above.
69. CE/92052/25	Object	There will not be enough car parks to hold 120 people. There are already other churches in the area.	See 1.1 above. See 3.1 above.
70. CE/92053/25	Object	Object.	Noted.
71. CE/92055/25	Object	Wygonda Road is already a busy road between major routes to the shops and the additional traffic this development would be detrimental to our community.	See 1.1 above. See 2.1 above.

72. CE/92058/25	Object	Traffic congestion in main thoroughfare to local shops causing safety hazards for traffic. There is already places of Worship in Roleystone.	See 1.1 above. See 2.1 above.
73. CE/92070/25	Object	We have more than enough churches in this area, to accommodate all the worshippers, from surrounding suburbs.	See 1.1 above.
74. CE/92099/25	Object	Object.	
75. CE/92114/25	Object	Small cul-de-sac not fit for overflow parking.	See 3.1 above.
76. CE/92116/25	Object	Planning/parking issues/noise levels.	See 1.1 above. See 3.1 above. See 13.1 above.
77. CE/92126/25	Object	This will cause increased congestion in the middle of Roleystone, as well as potential conflict during activities at Roleystone club. There is insufficient parking at the site for the number of expected parishioners – this has caused issues at other similar sites, causing cars to park along the road and obstruct access.	See 1.1 above. See 2.1 above. See 3.1 above.
78. CE/92129/25	Object	The scale and intensity of the proposed ‘Place of Worship’ — with weekly services for approximately 120 people, additional midweek meetings, youth groups, and other activities — represents an institutional use that is clearly more suited to a civic or commercial area, not a quiet residential neighbourhood.	See 1.1 above.
79. CE/92133/25	Object	Associated vehicle traffic is excessive for a quiet residential setting. There is likely to be significant shortfall in parking, resulting in overflow into surrounding streets. The cumulative impact of meetings would result in a level of noise, activity, and disturbance incompatible with the expectations of residents in a low-density residential area.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above.
80. CE/28286/25		We need more local sports facilities not more churches.	See 1.1 above.
81. CE/92219/25	Object	Object	Noted.
82. CE/92526/25	Object	There is an insufficient number of parking bays. Roleystone already well served by many churches in the area.	See 1.1 above. See 3.1 above.
83. CE/92529/25	Object	Overflow parking would disrupt our shopping complex parking and even our Roleystone club facilities. Roleystone has places of worship that more than satisfy community needs.	See 1.1 above. See 3.1 above.

84. CE/92641/25	Object	This will cause too much traffic. We already have places of worship up in the hills.	See 1.1 above. See 2.1 above.
85. CE/92650/25	Object	This will cause too much traffic. We already have places of worship up in the hills.	See 1.1 above. See 2.1 above.
86. CE/92652/25	Object	Parking will infiltrate surrounding parking. The use is not suitable for the Roleystone area and community.	See 1.1 above. See 3.1 above.
87. CE/92747/25	Object	Not only does the community have sufficient places of worship I am concerned about the traffic and parking that may infringe on our quiet roads.	See 1.1 above. See 2.1 above. See 3.1 above.
88. CE/92748/25	Object	There is enough churches in Roleystone to serve the community. Property would better serve the community with another use.	See 1.1 above.
89. CE/92749/25	Object	This area does not need more traffic. The church will not have enough area to park so will start using the country clubs parking and all over the road. There are enough churches in the area already and another serves no purpose.	See 1.1 above. See 2.1 above. See 3.1 above.
90. CE/92750/25	Object	Object.	Noted.
91. CE/92751/25	Object	No adequate parking for 120 attendees.	See 3.1 above.
92. CE/92752/25	Object	Already too many churches around. The parking situation will cause such a disturbance to the streets and shops near by.	See 1.1 above. See 3.1 above.
93. CE/92753/25	Object	The traffic and parking will cause issues. Also Roleystone would far better benefit from a public place that all can enjoy.	See 1.1 above. See 2.1 above. See 3.1 above.
94. CE/92754	Object	There is not enough parking. It is a busy road. We already have places of worship for those who wish to.	See 1.1 above. See 2.1 above. See 3.1 above.
95. CE/92755	Object	This area is the hub of Roleystone and already experiences a high volume of traffic on the weekend.	See 2.1 above.
96. CE/92756/25	Object	I believe that this will create a problem with parking on days of worship. I do believe that this place should be of recreation as this is what is needed in Roleystone.	See 1.1 above. See 3.1 above.

97. CE/92757	Object	Object.	Noted.
98. CE/92758/25	Object	The proposed site does not have sufficient on-site parking to support regular large-scale gatherings. The increased volume of traffic and noise associated with frequent gatherings and events will negatively impact the peaceful, residential character of Wygonda Road and its surrounds. There appears to be limited community consultation in the planning stages of this proposal. I believe wider engagement with residents should have been prioritised before the submission of this application.	98.1 See 1.1 above. 98.2 See 2.1 98.3 See 3.1 above. 98.4 See 13.1 above. 98.5 Consultation has been undertaken with the wider community by giving special notice in accordance with Clause 64 of the Deemed Provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.
99. CE/92759/25	Object	Lack of adequate parking, traffic, congestion. I would definitely use that gym facility, and would much prefer either a gym or youth space.	See 1.1 above. See 2.1 above. See 3.1 above.
100. CE/92760/25	Object	Traffic would be an issue as well. As property isn't able to be used for the community.	See 1.1 above. See 2.1 above.
101. CE/92761	Object	Traffic congestion and significant issues with parking.	See 2.1 above. See 3.1 above.
102. CE/92763	Object	Object.	Noted.
103. CE/92764/25	Object	Quiet inner suburban street is not the right place for 120 people to regularly meet.	See 1.1 above.
104. CE/92767/25	Object	It's going to cause way too much congestion on the surrounding roads.	See 2.1 above.
105. CE/92768	Object	Object due to lack of parking to support proposed event sizes.	See 3.1 above.
106. CE/92781/25	Object	Do not want another place of worship in the area.	See 1.1 above.
107. CE/92782/25		There is not enough parking facilities at the proposed site to support this proposal which will result in a lot of congestion on and around Wygonda road.	See 2.1 above. See 3.1 above.
108. CE/92783/25	Object	Concerned in regard to parking and increase traffic congestion in the area.	See 2.1 above. See 3.1 above.
109. CE/92784/25	Object	Roleystone already has a place of worship and there is a another down the hill in Kelmscott. There is concern that this change of use will create severe traffic and parking problems for locals.	See 1.1 above. See 2.1 above. See 3.1 above.

110. CE/92785/25	Object	I'm extremely concerned about the negative impact of traffic congestion and excessive parking overflow this change of use will have on the Roleystone community.	See 2.1 above. See 3.1 above.
111. CE/92789/25	Object	Object.	Noted.
112. CE/92790/25	Object	Putting a church in a building where there is limited parking will cause congestion on an already busy road.	See 2.1 above.
113. CE/92791/25	Support	Given the time of the main service it would seem the adverse impact on nearby activities would be limited.	Noted.
114. CE/92792/25	Object	Object.	Noted.
115. CE/92793/25	Object	There is a place of worship no more than 2km in every direction from the proposed site.	See 1.1 above.
116. CE/92794/25	Object	I would not like to see this turned into a church. I also do not think 24 car spaces would not be sufficient for the amount of proposed participants.	See 1.1 above. See 3.1 above.
117. CE/92796/25	Object	We do not a place of worship in the centre of town. Parking will be an issue for the residents in that area.	See 1.1 above. See 3.1 above.
118. CE/92797/25	Object	Parking is already horrendous at Roleystone shop and surrounding areas. Develop something that will be used by the community and not a small percentage of people.	See 1.1 above. See 2.1 above. See 3.1 above.
119. CE/92798/25	Object	Even though I am not a neighbouring property I am very concerned at where all of the congregation will be parking.	See 3.1 above.
120. CE/92799/25	Object	There will not be enough parking space so people will park anywhere.	See 3.1 above.
121. CE/92802/25	Object	The traffic proposal seems unrealistic and there is insufficient parking. Thus putting the area at higher risk of congestion A place of worship is better placed in a commercial area where the impact on community is lessened.	See 1.1 above. See 2.1 above. See 3.1 above.
122. CE/92803/25	Object	Genuine concern as to traffic congestion and parking issues on weekends. The property does not have sufficient parking for their congregation numbers. They are expecting 120 members yet only 31 parking bays. This would put undue pressure on neighbouring properties as well as the shopping centre car park. This property is more suited to recreational purposes not a place of worship.	See 1.1 above. See 2.1 above. See 3.1 above.

123. CE/92804/25	Object	There is not enough parking to support the use of this building. Is there somewhere else some parking can be made available that does not also remove the remnant bushland on the property.	123.1: See 3.1 above. 123.2: The applicant is not proposing the removal of native trees identified in the applicant's Arborist Report.
124. CE/92805/25	Object	There are many other services required for our community, this option only supports a small number of people.	See 1.1 above.
125. CE/92806/25	Object	I believe it would cause a traffic nightmare, especially on the evenings of Roleystone Market. It is difficult enough already to obtain parking at that time and at other times when events are ongoing. The building and area would be better suited to a gym/cafe as originally intended.	See 1.1 above. See 2.1 above. See 3.1 above.
126. CE/92808/25	Object	The local area will all be impacted with additional congestion. Parking is already limited.	See 2.1 above. See 3.1 above.
127. CE/92812/25	Object	Object.	Noted.
128. CE/92814/25	Object	We already have multiple places of worship close. A church is far too much for that road traffic-wise.	See 1.1 above. See 2.1 above.
129. CE/92815/25	Object	Roleystone already has a place of worship and there is a another down the hill in Kelmscott. There is concern that this change of use will create severe traffic and parking problems for locals.	See 1.1 above. See 2.1 above. See 3.1 above.
130. CE/92818/25	Object	24 car parking bays does not seem enough to support the venture.	See 3.1 above.
131. CE/92819/25	Object	There are too many churches around this area already. Adding this one will make so much more traffic coming up Brookton Highway.	See 1.1 above. See 2.1 above.
132. CE/92820/25	Object	Object	Noted.
133. CE/92821/25	Object	How will the new owners plan to mitigate traffic and parking issues and possible accidents due to up to 120 people attending their premises at one time ?	See 2.1 above. See 3.1 above.
134. CE/92825/25	Object	There is enough congestion in Roleystone as it is when markets etc. are on.	See 2.1 above.
135. CE/92829/25	Object	I object due to an increased amount of parking especially on the weekends. It is already hard enough to park on the weekends. Furthermore, I don't believe this serves our community.	See 1.1 above. See 3.1 above.

136. CE/92830/25	Object	There are enough churches in the immediate suburbs.	See 1.1 above.
137. CE/92870/25	Object	I object to yet another place of worship being built in the local area. There is very limited parking at the site. People will park along the verge and make traffic difficult for the shopping centre or attending Cross Park.	See 1.1 above. See 2.1 above. See 3.1 above.
138. CE/92874/25	Object	The proposal to change the current recreation centre to a place of worship will put a strain on the already limited parking available at the shopping centre. The carpark at the centre will not accommodate such use. We already have issues with parking on Market days, home football/cricket games and election days. There would be other better suited sites for a place of worship capable of accommodating the volume of vehicles associated with this use. Roleystone's infrastructure is inadequate to sustain such traffic hazards on such a recurring and regular basis.	See 1.1 above. See 2.1 above. See 3.1 above.
139. CE/92875/25	Object	This community already has 2 churches.	See 1.1 above.
140. CE/92876/25	Object	The proposed building to be converted into a church does not have adequate parking facilities.	See 3.1 above.
141. CE/92882/25	Object	This space should be kept as a community space. We don't need more churches.	See 1.1 above.
142. CE/92885/25	Support	The premises would be mostly used on Sunday morning with some minor other usage.	Noted.
143. CE/92891/25	Object	I would prefer a non-religious organisation in the community and would rather it be developed into extra housing for the community.	See 1.1 above.
144. CE/92893/25	Object	There is not enough parking and will end up disrupting Wygonda Road that will effect other businesses and residents.	See 2.1 above. See 3.1 above.
145. CE/92895/25	Object	As this is on the main thoroughfare through the town centre and on the weekends it's busy with traffic, I think it will be detrimental to the area with the extra load on the roads and surrounding streets.	See 2.1 above.
146. CE/92909/25	Object	There is nowhere near enough parking on the premises.	See 3.1 above.

147. CE/92910/25	Object	There are 2 churches in Roleystone already.	See 1.1 above.
148. CE/92911/25	Object	The road is already busy, there is not enough car parks for the amount of people they expect. We don't need a church on this road.	See 1.1 above. See 2.1 above. See 3.1 above.
150. CE/92922/25	Object	This space should be kept as a community sports centre not a segregated church for a minority group of the community.	See 1.1 above.
151. CE/92924/25	Object	This will cause major issues to traffic, parking and the local country club.	See 2.1 above. See 3.1 above.
152. CE/92927/25	Object	We don't need another place of worship in such a small community.	See 1.1 above.
153. CE/92928/25	Object	Roleystone does not need a church. There are already churches in the foothills and surrounding areas as it is.	See 1.1 above.
154. CE/92931/25	Object	The local community already has multiple churches and places of workshops within Roleystone and Kelmscott hills. There is insufficient parking around the local IGA and suburbs which will result in congestion.	See 1.1 above. See 2.1 above. See 3.1 above.
155. CE/92936/25	Object	There will not be adequate parking. There are already multiple churches in Roleystone, with another two being built nearby on Brookton Highway.	See 1.1 above. See 3.1 above.
156. CE/92938/25	Object	We don't need another place of worship.	See 1.1 above.
157. CE/92939/25	Object	Local community already has multiple churches and places of worship. There isn't a need for this and it will cause a disruption to local traffic as there is insufficient parking.	See 1.1 above. See 2.1 above. See 3.1 above.
158. CE/92941/25	Object	Would really love something the community could use such as a gym.	See 1.1 above.
159. CE/92944/25	Object	I object to this as disturbing the peace and congestion in the area.	See 2.1 above. See 13.1 above.
160. CE/92952/25	Object	Roleystone already has several places of worship and members of the community have expressed no desire nor need for another. The parking lot adjoined to the property this application has been submitted for cannot cater for 120 people. Increased traffic to the area during the noted times is also less than ideal.	See 1.1 above. See 2.1 above. See 3.1 above.

161. CE/92955/25	Support	I support this! Hope it goes ahead.	Noted.
162. CE/92957/25	Object	We do not need a place of worship.	See 1.1 above.
163. CE/92990/25	Support	I support this application. It is an appropriate use of this site.	Noted.
164. CE/92993/25	Object	This is already a very busy area traffic wise, particularly on weekends and after school. There is not the facility to have an increase in traffic requiring parking of which there is insufficient on the proposed premises.	See 1.1 above. See 2.1 above. See 3.1 above.
165. CE/93005/25	Object	Object.	Noted.
166. CE/93007/25	Object	Not a suitable location. The traffic concerns being the largest point.	See 1.1 above. See 2.1 above.
167. CE/93058/25	Object	We have concerns about the lack of parking at the site and how this may impact the usage of the parking at the shops and surrounding businesses.	See 3.1 above.
168. CE/93061/25	Object	There is not enough parking or traffic management to support this. If further parking and traffic management is implemented, I worry the natural vegetation will be removed.	See 1.1 above. See 2.1 above. See 3.1 above. See 123.2 above.
169. CE/93063/25	Object	Object.	Noted.
170. CE/93068/25	Object	We have more than enough churches.	See 1.1 above.
171. CE/93096/25	Object	Insufficient parking.	See 3.1 above.
172. CE/93127/25	Object	There is simply not enough parking space. We do not need a church in Roleystone.	See 1.1 above. See 3.1 above.
173. CE/93149/25	Object	There will be parking issues with parking spilling onto the verge and into the street. There are already 3 churches in Roleystone and there should not be another church in the centre of our town.	See 1.1 above. See 3.1 above.
174. CE/93230/25	Object	This community does not need any more places of worship.	See 1.1 above.

175. CE/93232/25	Object	The use of the proposed location as a church is not compatible with the previous land use. There is strong community sentiment to retain this facility and a sports centre and cafe meeting place for all the community to use. This complements other uses of the area. Transport impact statement admits there is a 4 -bay parking shortfall with the proposed plan. This plan also estimates 42 vehicles in the weekend peak - however the proposal only provides for 31 bays. This is not adequate. Increased traffic volumes to and from the place of worship will impact significantly on businesses, residences, the community and congestions. It is highly likely visual amenity will be significantly changed by roof modifications. Bushfire safety assessment does not consider evacuation during an emergency fire event. The location is surrounded by native understory and trees.	See 1.1 above. See 2.1 above. See 3.1 above. See 123.2 above. 175.5 The applicant has confirmed that no modifications are proposed to the elevations or roof. 175.6 The applicant has submitted a Bushfire Emergency Evacuation Plan which addresses evacuation of the site in case of a bushfire event. As part of the actions required prior to bushfire season, the site within the lot surrounding the place of worship and dwelling are to be maintained to the requirements of Appendix B, Table 9 of the <i>Planning for Bushfire Guidelines</i> (as amended).
176. CE/93247/25	Object	It is not the type of business I would like in that area of our community.	See 1.1 above.
177. CE/93338/25	Object	I strongly object to the proposed church being built in our community due to serious concerns about increased traffic congestion and parking issues in an already busy area. This development does not benefit the local community.	See 1.1 above. See 2.1 above. See 3.1 above. See 4.2 above.
178. CE/93389/25	Object	I believe with our population of Roleystone all the locals have enough places of worship.	See 1.1 above.
179. CE/93398/25	Object	Facilities for parking are far from adequate.	See 3.1 above.
180. CE/93402/25	Object	Object.	Noted.
181. CE/93404/25	Support	I do not object to another church being opened in Roleystone.	Noted.
182. CE/93405/25	Object	Traffic and parking.	See 2.1 above. See 3.1 above.
183. CE/93406/25	Object	I object to the change of use to a place of worship. I feel very strongly that this will divide the community.	See 1.1 above.

184. CE/93408/25	Object	It brings nothing to the community.	See 1.1 above.
185. CE/93409/25	Object	Object.	Noted.
186. CE/93411/25	Object	There are already a large number of places of worship in the City. There is insufficient parking.	See 1.1 above. See 3.1 above.
187. CE/93412/25	Object	This is not suitable in the centre of a residential community. There is insufficient parking.	See 1.1 above. See 3.1 above.
188. CE/93413/25	Object	Traffic on Wygonda Road is backed up on Monday and Friday nights. The carpark at 8 Wygonda isn't very big. More cars coming and going adding to the congestion.	See 2.1 above. See 3.1 above.
189. CE/93414/25	Object	There are already community churches that offer those who wish to attend a place to worship.	See 1.1 above.
190. CE/93425/25	Object	Object.	Noted.
191. CE/93416/25	Object	Object.	Noted.
192. CE/93418	Object	The proposal does not adequately address the real parking, traffic and noise impacts it will create. Without rigorous assessment and enforceable conditions, local amenity and safety will be compromised.	See 2.1 above. See 3.1 above. See 13.1 above. 192.6: Appropriate conditions will be applied to ensure compliance with relevant requirements.
193. CE/93419/25	Object	Given the lack of extant indoor recreational facilities in Roleystone and declining attendance of churches in general across Australia I cannot in good conscience support this use of the facility.	See 1.1 above.
194. CE/93420/25	Support	I fully support the building being changed to a place of worship.	Noted.
195. CE/93421/25	Object	There is not nearly enough car bays.	See 3.1 above.
196. CE/93422/25	Object	This proposal will cause too much congestion. An establishment like this is not compatible with the other businesses around.	See 1.1 above. See 2.1 above.
197. CE/93423/25	Object	With the traffic we won't even be able to get to Roleystone shops.	See 2.1 above.

198. CE/93425	Object	30 bays for 120 people will not be enough.	See 3.1 above.
199. CE/93426/25	Object	I don't think that 31 carparking bays for 120 people is right as that will mean a lot of street parking taken up.	See 3.1 above.
200. CE/93429/25	Object	The community infrastructure is not sufficient to handle overflow cars and traffic every Sunday.	See 2.1 above See 3.1 above.
201. CE/93430/25	Object	There doesn't seem to be enough parking to accommodate the weekly Sunday service of 120 people. I don't want to see the roads becoming congested. My second objection is that this use seems to be very closed and not open to community.	See 1.1 above. See 2.1 above. See 3.1 above.
202. CE/93432/25	Object	Roleystone is not large enough to accommodate the extra parking and general traffic.	See 2.1 above. See 3.1 above.
203. CE/93434/25	Object	I have concerns for local traffic.	See 2.1 above.
204. CE/93435/25	Object	I respectfully object.	Noted.
205. CE/93437/25	Object	There is already a church being built down the bottom on Brookton Highway.	See 1.1 above.
206. CE/93438/25	Object	There is not enough space for parking to accommodate this. The increase of traffic also creates issues.	See 2.1 above. See 3.1 above.
207. CE/93443/25	Object	Not a suitable location for a worship building. Not enough carpark.	See 1.1 above. See 3.1 above.
208. CE/93445/25	Object	Lack of parking. Extra noise. Clash with other events such as markets.	See 2.1 above. See 3.1 above. See 13.1 above.
209. CE/93447/25	Object	This location is already in deficit for parking. This is simply the wrong location.	See 1.1 above. See 3.1 above.
210. CE/93448/25	Object	Approval of the application will be detrimental to the community.	Noted.
211. CE/93449/25	Support	It would be good for the local community and local business, go ahead with the Church.	Noted.

212. CE/93453/25	Object	Put places of worship where there is a high population of that particular demographic.	See 1.1 above.
213. CE/93455/25	Object	I object to a place of worship located in this location.	See 1.1 above.
214. CE/93458/25	Object	The place of worship will increase traffic to our village. We have enough places of worship already.	See 1.1 above. See 2.1 above.
215. CE/93461/25	Object	There is already an established church operating within close proximity to the proposed site. Of particular concern is the likely impact on traffic.	See 1.1 above. See 2.1 above.
216. CE/93462/25	Object	Make the use useful for the community.	See 1.1 above.
217. CE/93463/25	Object	I object to a place of worship as it is not inclusive to the majority of the community.	See 1.1 above.
218. CE/93464/25	Object	I oppose the proposed place of worship on Wygonda Road, with parking and increased traffic.	See 1.1 above. See 2.1 above. See 3.1 above.
219. CE/93466/25	Object	We do not support the plan for a religion to operate from a premises within the local area.	See 1.1 above.
220. CE/93467/25	Object	I strongly object the application and its purpose for a place of religious worship.	See 1.1 above.
221. CE/93490/25	Object	There is insufficient parking in that area for a Church. The street does not have the potential to meet this demand.	See 2.1 above. See 3.1 above.
222. CE/93493/25	Object	Within our local area there are 4 churches already. There is not enough allocated parking spaces.	See 1.1 above. See 3.1 above.
222. CE/93496/25	Object	We already have two churches in Roleystone and don't feel that we need another.	See 1.1 above.
223. CE/93507/25	Object	Insufficient private parking to support plan.	See 3.1 above.
224. CE/93510/25	Object	There is no place for religion in this area.	See 1.1 above.

225. CE/93512/25	Object	Part of the beauty of Roleystone is the lack of churches and people.	See 1.1 above.
226. CE/93513/25	Object	There is not enough allocated parking. We also have noise concerns, both from cars and the services held at the building.	See 3.1 above. See 13.1 above.
227. CE/93514/25	Object	Object.	Noted.
228. CE/93520/25	Object	Object.	Noted.
229. CE/93523/25	Object	I believe the proposal is unsuitable for the area of Roleystone. It will create traffic congestion for the surrounding areas.	See 1.1 above. See 2.1 above.
230. CE/93524/25	Object	2 local churches is enough with a massive one going up down the hill. We should be subjected to all of this congestion.	See 1.1 above. See 2.1 above.
231. CE/93531/25	Object	There's enough place of worship between Kelmscott & Gosnells.	See 1.1 above.
232. CE/93533/25	Object	There is a place of worship being built down the hill.	See 1.1 above.
233. CE/93536/25	Object	Object.	Noted.
234. CE/93551/25	Object	We do not need more churches.	See 1.1 above.
235. CE/93565/25	Object	The property does not have enough parking for their 120 members.	See 3.1 above.
236. CE/93568/25	Object	Not enough parking spaces. Do not need another church. Disturbance of the peace.	See 1.1 above. See 3.1 above. See 13.1 above.
237. CE/93631/25	Object	I would think a church right next door to the club would clash with the events that are held there.	See 1.1 above.
238. CE/93642/25	Object	I object due to lack of parking.	See 3.1 above.
239. CE/93662/25	Object	The number of persons estimated to attend meetings and functions appears to be far in excess of the number of car bays and parking available at the site.	See 3.1 above.
240. CE/93688/25	Object	Not enough parking for number of worshipers, most worshipers will be driving up the hill, the roads are already dangerous with number of visitors for places in the hills, with most drivers driving up the hill very slow as not used to hills or taking into consideration bike riders!	See 2.1 above. See 3.1 above.

241. CE/93696/25	Object	I object to the amount of parking being provided for the Sunday worshipping capacity. It is not sufficient.	See 3.1 above.
242. CE/93701/25	Object	There is nowhere near enough parking at the above location.	See 3.1 above.
243. CE/93704/25	Object	The increase traffic flow would have a negative impact.	See 2.1 above.
244. CE/93782/25	Object	If the number of people for the service is 120, there is only enough parking for maximum 50 cars.	See 3.1 above.
245. CE/93783/25	Object	The proposal will mean that this traffic flow will be all at one time. Wygonda Rd is not adequate for such traffic flows. 24 car bays are manifestly insufficient for the numbers involved.	See 2.1 above. See 3.1 above.
246. CE/93799/25	Object	Wygonda Rd is not adequate for the traffic flows. 24 car bays is insufficient.	See 1.1 above. See 2.1 above. See 3.1 above.
247. CE/93879/25	Object	The lack of parking will lead to the increase of verge parking or parking at the local shops. We would rather the centre be used for the public.	See 1.1 above. See 3.1 above.
248. CE/93912/25	Object	Object.	Noted.
249. CE/93937/25	Object	I have strong concerns about the disturbance this will create in the are due to lack of parking, increased traffic and noise levels.	See 2.1 above. See 3.1 above. See 13.1 above.
250. CE/93981/25	Object	Children, youth and adults would all benefit from a recreational space.	See 1.1 above.
251. CE/93983/25	Object	Only 31 bays are proposed. This will cause congestion and inappropriate parking in the surrounding areas. Services and meetings will cause noise issues. This area is already congested.	See 2.1 above. See 3.1 above. See 13.1 above.
252. CE/94137/25	Object	There is insufficient parking on the site for the proposed use. Overflow parking is likely to affect other businesses operating in the area, as well as neighbouring residential properties.	See 3.1 above.
253. CE/94157/25	Object	Parking will be an issue throughout the week.	See 3.1 above.
254. CE/94161/25	Object	Object.	Noted.
255. CE/94163/25	Object	I object to this application for it to be this place of worship. I believe there is not enough parking for the amount of people that they are expecting to attend.	See 1.1 above. See 3.1 above.
256. CE/9421/25	Object	There is not enough parking in the area.	See 3.1 above.

257. CE/94287/25	Object	The site only has enough parking for about 30 cars.	See 3.1 above.
258. CE/94759/25	Object	We regularly attend the Roleystone Country Club on Sunday's, and the carpark is always full and it can be challenging to find a free bay. My concern is about where the overflow cars will go. I also feel that many members of our community are unaware of the proposed changes and there hasn't been enough consultation with the residents.	See 3.1 above. See 98.5 above.
259. CE/94989/25	Object	Sewerage needs to be considered, given the age of the building and that the original building was never built to cope with these numbers. Privacy fencing could be considered to partially offset the noise of car doors opening and closing, headlights, music, amplified sermons and general people noise. Roleystone is a high fire risk location. Bringing large numbers of people into this community, many of whom would have no ideas about correct bush fire awareness, also seems to be a risk.	See 1.1 above. 259.2: A Condition could be applied that requires a Site and Soil Evaluation to ensure a proposed system is appropriate for the site conditions. See 13.1 above. See 175.6 above.
260. CE/95582/25	Object	There is not sufficient parking as we all know there will not be 4 people in a car. There is also a noise issue for the residents who live close by. We don't feel this is the right location to be putting a church in the centre of town.	See 1.1 above. See 3.1 above. See 13.1 above.
261. CE/95882/25	Object	I would prefer the building to be used for a more community-based activity rather than for a select minority.	See 1.1 above.
262. CE/95883/25	Object	Object.	Noted.
263. CE/95884	Object	Not suitable application for Roleystone.	See 1.1 above.
264. CE/95887/25	Object	My main concern is the parking allocation for the application. Definitely not enough parking for the worship. We have churches in the area already and a new one being built on Brookton Highway.	See 1.1 above. See 3.1 above.
265. CE/95892/25	Object	It is unsuitable for the amount of parking spaces and traffic flow to this part of Roleystone. Space is limited within the township of Roleystone and applications should reflect the suitability of the location.	See 1.1 above. See 3.1 above.
266. CE/95895/25	Object	This space could be put to different use.	Noted.

267. CE/95897/25	Object	Another church is not needed here.	Noted.
268. CE/95899/25	Object	Object.	Noted.
269. CE/95907/25	Object	I believe it being a church with a large congregation the parking will be an issue. We already have a large number of churches in the community and there is no need for more.	See 1.1 above. See 3.1 above.
270. CE/95912/25	Object	While I respect the right to freedom of worship, I have serious concerns about the practicality and suitability of this development. The development offers limited parking, and increased traffic during services or events.	See 1.1 above. See 2.1 above. See 3.1 above.
271. CE/95913/25	Object	I refer to parking which is totally inadequate. Then you have the noise that this will create.	See 3.1 above. See 13.1 above.
272. CE/95914/25	Object	There has been a lack of transparent consultation. This objection is about preserving balance, respect, and neutrality in shared spaces.	See 1.1 above. See 98.5 above.
273. CE/95917/25	Object	I don't think there is a place for this church to operate in our community. The congestion that this will cause every Sunday will be ridiculous.	See 1.1 above. See 2.1 above.
274. CE/95920/25	Object	I agree with the community mix.	See 1.1 above.
275. CE/95921/25	Object	The proposed church is likely to generate a significant increase in traffic volume and demand for parking in our small village. It is important to note that other new places of worship are already being erected further along Brookton Highway. Many are questioning the transparency behind the approval of such projects.	See 1.1 above. See 2.1 above. See 98.5 above. The other proposals were advertised for public comment and assessment followed the relevant legislation.
276. CE/95924/25	Object	There is already a huge place of worship being constructed just down the road on Brookton Highway in Kelmscott. We do not need a place of worship here.	See 1.1 above.
277. CE/95928/25	Object	The proposed church is likely to generate a significant increase in traffic volume and demand for parking in our small village. This would place additional strain on our limited road infrastructure. This influx may place further pressure on our local amenities. It is important to note that other new places of worship are already being erected further along Brookton Highway. These large, industrial-sized buildings have already begun to alter the architectural landscape and visual harmony of our semi-rural region. Many are questioning the transparency behind the approval of such projects.	See 1.1 above. See 2.1 above. See 3.1 above. See 98.5 above. See 175.5 and 275 above.

278. CE/95941/25	Object	There is not enough parking to support the proposed numbers.	See 3.1 above.
279. CE/95942/25	Object	The Roleystone community needs greater access to community buildings. There is not enough community events/ activities for the community and this site is perfect to host them.	See 1.1 above.
280. CE/95944/25	Object	There are plenty of other churches in the vicinity.	See 1.1 above.
281. CE/95947/25	Object	The identified shortfall in parking bays will almost certainly result in overflow parking into nearby residential streets.	See 1.1 above. See 3.1 above.
282. CE/95950/25	Object	Object.	Noted.
283. CE/95955/25	Object	Parking is not sufficient. Noise to the local properties and homes does not fit the aesthetics of our beautiful community.	See 3.1 above. See 13.1 above.
284. CE/95960/25	Object	Location and nature of place of worship will negatively impact the community and parking.	See 1.1 above. See 3.1 above.
285. CE/95960/25	Object	I know that this particular building would be a great community facility.	See 1.1 above.
286. CE/95989/25	Object	This proposal does not suit the area. Wygonda Road will not support increased traffic. The site is not suitable without considerable redevelopment, which would greatly impact the local environment. There are many old trees here which we would rather keep. The driveway is not wide enough to provide appropriate or safe vehicle traffic. There is no appropriate turning area for when the carpark is full. There is nowhere near enough parking for the number of attendees proposed and there is no space to add them.	See 1.1 above. See 2.1 above. See 3.1 above. See 123.2 above.
287. CE/95990/25	Object	Congestion of traffic in the centre of Roleystone due to increased traffic flow, parking due to lack of parking on grounds which will create a community nuisance.	See 2.1 above. See 3.1 above.
288. CE/95993/25	Object	I am concerned about the negative impact of traffic and overflow of parking on the centre of our community. There is very limited room on the site for addition parking. This clearly can not be extended without having a negative impact on the natural environment and vegetation.	See 2.1 above. See 3.1 above. See 123.2 above.
289. CE/95998/25	Object	Additional traffic coming in and out of service for parking.	See 2.1 above.

290. CE/96002/25	Object	The proposed change of use appears inconsistent with the current zoning and objectives of the Residential zone. The proposal is likely to adversely affect the amenity of nearby residents due to increased traffic on Wygonda Road, noise, traffic and parking concerns. Roleystone is known for its sensitive environmental setting, including native bushland, wildlife corridors, and fire-prone areas. A change of use that intensifies the site's use may increase bushfire risk if not properly assessed and managed. Result in vegetation clearing or environmental degradation. Many residents were unaware of the proposal and feel that more extensive community consultation should have been conducted.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above. See 98.5 above. See 123.2 above.
291. CE/96018/25	Object	I believe this is not a suitable dwelling for a place of worship. There is not sufficient parking or space for 120 visitors. The traffic this would bring in would make it very difficult for locals to be able to use parking at surrounding businesses.	See 1.1 above. See 2.1 above. See 3.1 above.
292. CE/96021/25	Object	The building is not suited to a place of worship. The number of planned attendees at services far outweighs the availability of parking on site.	See 1.1 above. See 3.1 above.
293. CE/96022/25	Object	Not enough parking.	See 3.1 above.
294. CE/96023/25	Object	This site does not have the capacity to support the traffic that would impact the usage of the building and I do not support any religion.	See 1.1 above. See 2.1 above. See 3.1 above.
295. CE/96025/25	Object	Object.	Noted.
296. CE/96031/25	Object	I'm writing to lodge my firm opposition. We moved here for space, for community, for freedom. The people of Roleystone shouldn't have to navigate spiritual pressure every time they go to the bakery or attend a market.	See 1.1 above.
297. CE/96033/25		I cannot ignore the cultural harm. Religion has a complicated history with our people. Our town centre should be a place for neutral connection.	See 1.1 above.
298. CE/96039/25	Object	Our civic spaces must remain neutral and welcoming to all. The town centre is for everyone. This feels like it's being pushed through without proper public consultation. I want Roleystone to stay gentle, balanced, and community-led.	See 1.1 above. See 98.5 above

299. CE/96080/25	Object	Overflow parking will severely impact the doctors surgery parking, access to the garage, impact the shopping centre carpark as well as the Country Club grounds and parking. Being right in the busiest part of the township will also cause traffic congestion.	See 2.1 above. See 3.1 above.
300. CE/96212/25	Object	The Roleystone Community already has two functioning places of worship with another under construction further down Brookton Highway.	See 1.1 above.
301. CE/96214/25	Object	Object.	Noted.
302. CE/96217/25	Object	This location is not suitable for this purpose. There is not adequate parking for this many people or vehicles.	See 1.1 above. See 3.1 above.
303. CE/96222/25	Object	I don't believe it is a suitable location for a specific religious group.	See 1.1 above.
304. CE/96225/25	Object	I believe the location is unsuitable for a Place of Worship. I am not opposed to places of worship however I believe the right location is a big factor, and in this case I don't believe the location is suitable for a place of Worship. Parking will be an issue, noise will be an issue to the surrounding homes.	See 1.1 above. See 3.1 above. See 13.1 above.
305. CE/96227/25	Object	I strongly oppose this development due to the increased vehicle movement will add to congestion and pose risks on already busy local roads. Inadequate on-site parking may lead to overflow onto nearby residential streets. Regular gatherings and events, especially outside normal hours, may result in excessive noise that affects the peaceful enjoyment of our homes. Additional outdoor lighting from buildings or parking areas could disrupt nearby properties, particularly at night. Higher foot and vehicle traffic raises safety concerns for children, pedestrians, and other road users in the area. The development could negatively affect local green space, native flora and fauna, and storm water drainage systems.	See 2.1 above. See 3.1 above. See 4.2 above. See 13.1 above. See 123.2 above. 305.4: Lighting is to comply with Australian Standard 4282-1997 "Control of the obtrusive effects of outdoor lighting" or its equivalent and the City's <i>Environment, Animals and Nuisance Local Laws 2002</i> . 305.5: Stormwater can be addressed by the City's Technical Services following determination, via the imposition of appropriate conditions.
306. CE/96230/25	Object	The proposal will impact on carparking for patrons to the Community Club.	See 3.1 above.
307. CE/96270/25	Object	I strongly believe Roleystone is not a spot for any religious places.	See 1.1 above.

308. CE/96285/25	Object	It will increase traffic in the area. I have no issue with any religion but the locations is not correct for a place of worship.	See 1.1 above. See 2.1 above.
309. CE/96291/25	Object	There is not ample parking at the proposed site. I feel it will cause traffic congestion in the surrounding area.	See 2.1 above. See 3.1 above.
310. CE/96295/25	Object	There is not ample parking at the proposed site. I feel it will cause traffic congestion in the surrounding area.	See 2.1 above. See 3.1 above.
311. CE/96296/25	Object	The proposal has no limit of congregation numbers therefore parking will overflow. Roleystone is known for its large trees and removal of trees for parking is not within hills culture.	See 3.1 above. See 123.2 above.
312. CE/96305/25	Comment	It's not a church that Roleystone is asking for. Parking will be inadequate. Septic tanks will probably be inadequate.	See 1.1 above. See 3.1 above. See 259.2 above.
313. CE/96315/25	Object	A few significant local concerns with the proposed place of worship is the definite impact on the traffic infrastructure. Other factors are disturbing the peace, impact on local businesses, safety concerns, zoning misalignment and visual impacts.	See 1.1 above. See 2.1 above. See 4.2 above. See 13.1 above. See 175.5 above.
314. CE/96319/25	Object	The proposed site is already located in an area with significant traffic flow. Introducing additional traffic from church events would worsen congestion. There is limited off-street parking in the area, and I am concerned that overflow parking will spill onto footpaths and into adjacent properties.	See 2.1 above. See 3.1 above.
315. CE/96321/25	Object	I do not want a place of worship in Roleystone or beside the country club that I and my wife are members at. There is already a church on Croydon Rd.	See 1.1 above.
316. CE/96324/25	Object	The submission shows its parking availability is at capacity at commencement. The increase in traffic for what is a quiet area is unfair on the surrounding area. There is an increase in noise for surrounding residents.	See 2.1 above. See 3.1 above. See 13.1 above.
317. CE/96332/25	Object	There is not enough parking at the proposed place of worship and will increase traffic and street parking.	See 2.1 above. See 3.1 above.

318. CE/96334/25	Object	I feel that traffic management will be a issue, considering the parking bays the residence has.	See 2.1 above. See 3.1 above.
319. CE/96344/25	Object	Traffic concerns. Parking concerns, noise concerns, light concerns, safety concerns and environmental concerns.	See 2.1 above. See 3.1 above. See 4.2 above. See 13.1 above. See 123.2 above.
320. CE/96347/25	Object	Traffic congestion and safe parking issues. There's only a small parking lot with only one entrance/exit to Lot 500. I don't think that this proposal is in keeping with our unique community vibe and would impact negatively on our little piece of paradise.	See 1.1 above. See 2.1 above. See 3.1 above.
321. CE/96361/25	Object	My issue is parking for the said congregation.	See 3.1 above.
322. CE/96458/25	Object	Parking is a certain problem as have been told around 120 people at any one given time. Access to the venue is small, entry for only 1 car at a time and no turn around area. Noise levels due to crowd, and lighting is not good so the area could be a problem for surrounding residents.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above. See 305.4 above.
323. CE/96460/25	Object	Increased traffic into Roleystone. This is not in keeping with our community turning it into a high traffic area.	See 2.1 above.
324. CE/96461/25	Object	There are plenty of places of worship around the community without interfering with our quaint community. We are not designed for the extra parking/traffic.	See 1.1 above. See 2.1 above. See 3.1 above.
325. CE/964462/25	Object	I do not believe such a facility is beneficial or necessary for the current residence of Roleystone and will not have enough parking.	See 1.1 above. See 3.1 above.
326. CE/96517/25	Object	A church is not needed next to a country club. The area should be used for other community based activities.	See 1.1 above.
327. CE/96519/25	Object	For the mainstream type of religions, there are already many in the Roleystone/Hill area. Parking being limited.	See 1.1 above. See 3.1 above.

328. CE/96550/25	Object	I know of the traffic chaos it will cause as there isn't sufficient parking space at the site.	See 2.1 above. See 3.1 above.
329. CE/96553/25	Object	As a member of the Roleystone Club I believe this will affect parking for members of the club. I also object as this place of worship will only be advantageous to a small part of the community.	See 1.1 above. See 3.1 above.
330. CE/96555/25	Object	I have concerns about the number of car parking spaces.	See 3.1 above.
331. CE/96556/25	Object	My concerns are for the extra traffic and parking concerns.	See 2.1 above. See 3.1 above.
332. CE/96558/25	Object	I think the community needs more spaces for young Australian family's and youths in the area, not places of worship. I also strongly believe the traffic and parking issues alone would cause a lot of problems.	See 1.1 above. See 2.1 above. See 3.1 above.
333. CE/96559/25	Object	I would love to see the Rec. Centre up and running to offer the community a place for indoor sports for fitness and community connection. We are lacking an indoor space for exercise in our area.	See 1.1 above.
334. CE/96560/25	Object	I object to this change of use primarily due to the increase in traffic on a small local road and the limited parking available at the proposed address. There are concerns this use would lead to additional lighting and noise disruptions for local community members. The area already has sufficient places of worship to support the local community members.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above.
335. CE/96562/25	Object	Not enough parking as mentioned 120 ppl at weekly services and there's only 34 possible parking spots. That road is not suitable for parking.	See 3.1 above.
336. CE/96563/25	Object	Wygonda Road and the surrounding residential streets are not designed to handle this level of traffic, especially during peak times such as Sunday mornings. Increased vehicle movement and overflow parking. The scale and frequency of gatherings are more appropriate for commercial or mixed-use areas, not a quiet suburban street. There are existing and new places of worship currently under construction or already operating in close proximity to this location.	See 1.1 above. See 2.1 above. See 3.1 above.

337. CD/38209/25	Object	I don't need the noise, nowhere to park and I don't want them parking in front of my house. Not enough room to park for all the cars. I don't want this place of worship across the road from me.	See 1.1 above. See 3.1 above. See 13.1 above.
338. CE/96619/25	Object	The site is unsuitable as it is next to the Roleystone Bowls Club and a private dwelling. It would be better suited to a Seniors living development.	See 1.1 above.
339. CE/96620/25	Object	Roleystone already accommodates two existing churches. The proposed location is not equipped to handle the increased volume of vehicles during services, events, and gatherings. Parking spillover onto residential streets will cause congestion. Services, musical events, and evening activities will create ongoing noise and light pollution. The use of floodlighting for night-time gatherings is particularly disruptive.	See 1.1 above. See 2.1 above. See 3.1 above. See 123.2 above. See 192.6 above. See 305.4 above.
340. CE/96621/25	Object	Parking is a huge issue for this area. The site would be more beneficial to Roleystone's families for recreation.	See 1.1 above. See 3.1 above.
341. CE/96623/25	Object	It does not fit in with the local area. There will be traffic and people coming and going at least 4 days a week. The parking area is relatively small for the proposed numbers of attendees and there is only one way in and out. Roleystone is a bushfire area and this must be taken into consideration also.	See 1.1 above. See 2.1 above. See 3.1 above. See 175.6 above.
342. CE/96637/25	Object	This Change of Use will not be compatible with existing activities and development. It borders residential properties on two/three sides, and the Roleystone Club on others. There will be an impact of noise in the location. Amplified music and vehicle movements are of concern. Parking provision is woefully inadequate for the proposed Change of Use. Increase in traffic numbers in Roleystone is of concern.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above.
343. CE/96638/25	Object	I don't believe that this location would be appropriate for a church. There is not adequate parking to support this.	See 1.1 above. See 3.1 above.
344. CE/96640/25	Comment Only	No answer.	Noted.
345. CE/96734/25	Object	Not a suitable use for this property, the property should be retained for public use only and not to a specific religious group.	See 1.1 above.

346. CE/96735/25	Object	Increased traffic without parking. Take this to an industrial unit in Kelmscott. Not suitable for Roleystone.	See 1.1 above. See 2.1 above. See 3.1 above.
347. CE/96739/25	Object	Currently there are 24 parking bays. The congestion caused by the single driveway, increased traffic and motorists unfamiliar with the area it is an accident waiting to happen.	See 2.1 above. See 3.1 above.
348. CE/96741/25	Object	We don't need anymore sites of worship in the City of Armadale. There's plenty already.	See 1.1 above.
349. CE/96813/25	Object	This location is close to the shops, family and community centres, country club and the oval. The parking on this property does not appear to be adequate.	See 1.1 above. See 3.1 above.
350. CE/96814/25	Object	This location is the wrong location for a place of worship as parking and lighting and noise and the amount of people.	See 1.1 above. See 3.1 above. See 13.1 above. See 305.4 above.
351. CE/96818/25	Object	No more places of worship. That area was for recreation (squash courts).	See 1.1 above.
352. CE/96819/25	Object	There is already a church being built on Brookton Hwy. It will cause congestion around the area with very limited parking.	See 1.1 above. See 2.1 above. See 3.1 above.
353. CE/96822/25	Object	Traffic is a concern as this is a main artery (Wygonda Road) and this area is already very busy and congested. Parking is a larger concern as the allocated parking is insufficient at the premise and the entrance to the property is not wide enough for two opposing cars. Noise and lighting is very concerning. There are special plants in the area that must be looked at.	See 2.1 above. See 3.1 above. See 13.1 above. See 123.2 above. See 305.4 above.
354. CE/96824/25	Object	Parking problems, traffic concerns, safety concerns, noise concerns.	See 2.1 above. See 3.1 above. See 4.2 above. See 13.1 above.
355. CE/96826/25	Object	Parking will be a problem. I am not a religious person and feel anything new in this small suburb should be for our community.	See 1.1 above. See 3.1 above.

356. CE/96830/25	Object	Object.	Noted.
357. CE/96833/25	Object	There is not enough parking in the area for a large place of worship. The traffic on that stretch of Wygonda Road is already busy.	See 2.1 above. See 3.1 above.
358. CE/96836/25	Object	The additional traffic will cause havoc at our local shopping centre and only a portion of the community will be able to utilise this space instead of the whole community.	See 1.1 above. See 2.1 above.
359. CE/96837/25	Object	They should go to the light industrial zones.	See 1.1 above.
360. CE/96839/25	Object	There are already multiple places of worship being developed in this and surrounding areas. It does not fit in with the community surrounding the proposed location and would make traffic/parking a lot more difficult at the local shops across the road.	See 1.1 above. See 2.1 above. See 3.1 above.
361. CE/96841/25	Object	I do not believe that the land is best utilised for this purpose. The land is not sizeable enough for parking. I simply do not think that this is the right choice for the land and existing infrastructure.	See 1.1 above. See 2.1 above. See 3.1 above.
362. CE/96845/25	Object	Do we need another church? Parking and traffic will increase too.	See 1.1 above. See 2.1 above. See 3.1 above.
363. CE/97151/25	Object	I highly object to this proposal as I am not a religious person. It will bring larger volumes of people and traffic.	See 1.1 above. See 2.1 above. See 3.1 above.
364. CE/97286/25	Object	I don't consider the facility and its location suits being a place of worship. I am concerned about the lack of parking available. I feel it is not conducive to our local environment.	See 1.1 above. See 3.1 above. See 123.2 above.
365. CE/97329/25	Object	We already have three established churches and multiple spiritual communities locally. For a proposal of this significance, all nearby residents should have been given the opportunity to comment. Increased vehicle flow into No. 8 will intensify congestion. The proposed carpark is obviously inadequate. The narrow driveway will need to accommodate all traffic (in and out). Current lighting is inadequate for night use. Mitigation of light pollution should be required. We are very concerned about noise from	See 98.5 above. See 1.1 above. See 2.1 above. See 3.1 above. See 305.4 above. See 13.1 above. See 123.2 above.

		increased vehicle movement, doors closing, and cars starting. There is currently no screening between the vacant adjacent block and No 8. If the proposal is approved, we request a 1.8m high fence be erected for privacy and light and sound reduction. We strongly object to any removal of bushland especially established Jarrah trees on or around the site.	See 192.6 above.
366. CE/97361/25	Object	Extra traffic on Wygonda Road and not enough parking exists.	See 2.1 above. See 3.1 above.
367. CE/97368/25	Object	I have concerns regarding parking by this tenancy.	See 3.1 above.
368. CE/97370		Such a building is not in keeping with the local environment. Wygonda Road and the surrounding streets are not suitable for the increase in traffic. The resultant noise would have an adverse impact on the local neighbourhood. That would also be the case of lighting.	See 1.1 above. See 2.1 above. See 175.5 above. See 13.1 above. See 305.4 above.
369. CE/97676/25	Support	The proposal is respectful of surrounding residents and infrastructure, while offering valuable cultural and social benefits to the community.	Noted.
370. CE/97786/25	Object	The current zoning is a good fit and we believe this should be left as it is. Will the sewerage cope, given the age of the building? Will the existing storm water drain cope with the extra run off? Has the road access for those living in the area in private dwellings been considered? Privacy fencing should be considered on side boundaries and back. This would need to be solid type fence maybe 1.8 to 2 metres high creating a buffer to partially offset the noise of car doors opening and closing, headlights, music, amplified sermons and general people noise. Roleystone is a high fire risk location.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above. See 175.5 above. See 259.2 above. See 305.5 above.
371. CE/97894/25	Support	This proposal for change of use to a place of worship appears to have minimal environmental and infrastructure impact, with services scheduled primarily held during off-peak hours to avoid traffic congestion, sufficient additions to on-site parking to prevent street overflow, and indoor-only activities with low noise levels. Lighting appears to comply with regulations to avoid disruption.	Noted.
372. CE/97895/25	Object	My main concern is the limited parking spaces. I cannot see how this church can benefit our local community.	See 1.1 above. See 3.1 above.

373. CE/97930/25	Object	'A place of worship' will cause significant parking and vehicle traffic issues.	See 2.1 above. See 3.1 above.
374. CE/97933/25	Object	Traffic and Parking Hazards. Worsening bushfire danger in an already fire-prone area, putting lives and property at risk. Destroying native vegetation and disrupting wildlife corridors. Incompatible commercial developments in a residential setting. The consultation process has been inadequate and exclusionary, and fails to meet community expectations for transparency and public involvement.	See 1.1 above. See 2.1 above. See 3.1 above. See 98.5 above. See 123.2 above. See 175.5 above. The documents for the development application were available on the City's website.
375. CE/97954/25	Object	Parking is a huge concern. Noise concerns. The submission does not fit with the history or the ambience of our hills lifestyle precinct. Roads would be unable to handle the volume of traffic predicted.	See 2.1 above. See 3.1 above. See 13.1 above. See 175.5 above.
376. CE/97955/25	Object	Position of proposed church and parking facilities are unsuitable for stated use.	See 1.1 above. See 3.1 above.
377. CE/98110/25	Object	Lack of onsite parking. Congestion of near-by parking areas. Currently other religious facilities in Roleystone are located outside of the immediate commercial precinct of Roleystone. The residences directly next to will be greatly impacted by noise.	See 1.1 above. See 3.1 above. See 2.1 above. See 13.1 above.
378. CE/98137/25	Object	The amount of traffic in the area and parking.	See 2.1 above. See 3.1 above
379. CD/38810/25	Support	Sufficient proposed additional car bays for on-site parking; no expected overflow into surrounding streets. All activities take place indoors with low sound levels. No outdoor amplified sound as may occur from the club. External lighting will be regulation compliant and non-intrusive to neighbours. Lower intensity of use compared to recreational events; respectful and quite attendees.	Noted.
380. CE/98787/25	Object	We have enough churches in Armadale and Roleystone. The requested area has got not enough car park spaces. Overloading traffic up and down streets.	See 1.1 above. See 2.1 above. See 3.1 above.
381. CE/98829/25	Object	Parking, traffic, noise, light, environmental and safety concerns.	See 2.1 above. See 3.1 above. See 4.2 above. See 13.1 above. See 123.2 above.

382. CE/98841/25	Object	Historically, this property has functioned as a café, squash courts, and a gymnasium, providing our residents with essential spaces that promote physical health, well-being, and social interaction. Increased traffic and noise concerns.	See 1.1 above. See 3.1 above. See 13.1 above.
383. CE/99101/25	Object	Object.	Noted.
384. CE/99121/25	Object	This could cause problems with traffic and parking very congested.	See 2.1 above. See 3.1 above.
385. CE/99122/25		There is no evidence that there is a demand within the Roleystone community for such a facility. Increase traffic and parking pressure in a narrow residential zone.	See 1.1 above. See 2.1 above. See 3.1 above.
386. CE/99123/25	Object	Impact the proposal will have on parking at the Roleystone Country Club and also the surrounding area.	See 3.1 above.
387. CE/99159/25	Object	Increased traffic and parking problems Noise or disruptions/ Impact on bushland, wildlife, or local amenity. Zoning not appropriate for religious buildings. Environmental or fire risk issues. Parking doesn't meet the requirements. Only two roads up to Roleystone and already enough traffic.	See 1.1 above. See 2.1 above. See 3.1 above. See 13.1 above. See 123.2 above. See 175.6 above.
388. CE/99160/25	Object	While I respect the rights of all community members to gather and worship, I have serious concerns about the impact this project would have. One of my primary concerns is the significant increase in traffic this development is likely to bring. Parking is another major issue. The lack of adequate parking will likely lead to overflow onto surrounding residential streets.	See 2.1 above. See 3.1 above.
389. CE/99161/25	Object	We already have very limited parking for sports and recreational events on weekends.	See 3.1 above.
390. CE/99197/25	Object	Not in best interest of the community.	See 1.1 above.
391. CE/99260/25	Object	Our major concern is the parking of all the anticipated vehicles to the area.	See 3.1 above.
392. CE/99339/25	Object	We don't need anymore churches and it will affect the events at the club and no one wants to listen to people sing on a Sunday.	See 1.1 above. See 13.1 above.

393. CE/99366/25 CE/99374/25	Object	We already have multiple churches. The people who do go to church in Roleystone have 4 other options.	See 1.1 above.
394. CE/99397/25	Object	We have concerns regarding traffic and parking issues and the safety risk this may pose. We are extremely concerned about the issue of noise pollution from the activities. There is no information given as to whether the existing septic/waste system is adequate for the number of people using the facility on a weekly basis. The proposal caters only for a small select group of people, not the wider community.	See 1.1 above. See 2.1 above. See 3.1 above. See 4.2 above. See 13.1 above. See 259.2 above.
395. CE/99577/25	Object	The extra lighting and increase in traffic and parking. At the end of the day, how many voting Roleystone residents asked for this?	See 1.1 above. See 2.1 above. See 3.1 above. See 305.4 above.



DEVELOPMENT
SITE PLAN

Lot 500 (No.8) Wygonda Road,
ROLEYSTONE

Plan No. | 24381-01
Date | 08/09/25
Drawn | NP
Checked | CP
Revision | B

PERTH & FORRESTDALE:
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Scale | 1:400@A3
0 5m 10m

NOTE: This plan has been prepared for planning purposes. Areas, Contours and Dimensions shown are subject to survey





Our Ref: 24381

29 October 2025

City of Armadale
Locked Bag 2
Armadale
WA 6992

Dear Karen,

RE: NOISE MANAGEMENT PLAN FOR PLACE OF WORSHIP DEVELOPMENT APPLICATION AT LOT 500 (NO. 8) WYGONDA ROAD, ROLEYSTONE

INTRODUCTION

This document represents a Noise Management Plan for the operations of a Place of Worship at Lot 500 (No. 8) Wygonda Road, Roleystone. It outlines activities occurring on site and control measures to minimise impacts to surrounding neighbours as determined in accordance with the Environmental Protection (Noise) Regulations 1997.

This report references a previously submitted Environmental Noise Assessment for the proposed 'Place of Worship', prepared by Herring Storer Acoustics.

The reports have been attached at **Appendix A** for your reference.

CRITERIA

Environmental noise in Western Australia is governed by the Environmental Protection Act 1986, through the Environmental Protection (Noise) Regulations 1997.

An environmental noise assessment was prepared by Herring Storer Acoustics which indicates a comprehensive assessment of noise compliance with the assigned levels for the site based on the proposed activities.

DETAILS OF PROPOSED ACTIVITIES

The activities occurring on the site including the following:

- A – Main service on Sundays occurring between 10AM-12PM for 100-120 members
- B – Monthly Sunday evening meeting at 6pm for 50-70 members
- C – Special meetings on weekends for visiting ministers
- D – Regular mid-week services on Wednesday or Fridays
- E – Youth group meetings one or two times a month on Saturday for 20 members

NOISE SOURCES

- Singing and music playing inside during services.
- Plant by way of the air conditioning.
- Car movements on site.



NOISE MANAGEMENT

The following will be implemented to manage noise:

- A minimum 1800mm solid continuous barrier for the area adjacent to the carpark at R4.
- Restriction of the four westmost car bays outside of the daytime period.
- Doors and windows to remain closed during services.
- Noise levels to be at normal conversation level.
- Amplified music will not be in use past 9pm.
- If mechanical services are to be updated, an acoustic assessment for the new plant will be undertaken.
- Measures within the HSA Addendum (Ref: 35099-3-25121).

COMPLAINT RESPONSE

The contact person is to be trained/experienced in the principles of excellent customer service skills (handling promptly and with empathy). The complaint response procedure consists of:

- A complaint log is to be maintained;
- Where a complaint is received, the following are to be recorded where provided;
- Details of the complaint;
- Name of complainant;
- Address of complainant;
- Contact details of complainant for any necessary follow up (phone number, email address);
- A record detailing how the complaint was resolved; and
- A complaint log is to be maintained and made available at the request of the local government authority.

Yours faithfully,

Lawrence Ko
Planning Consultant
Harley Dykstra

E-mail: lawrencek@harleydykstra.com.au



TREE MANAGEMENT AND CONSULTANCY

Arboricultural Report

8 Wygonda Road, Roleystone



Document details

TREESWEST AUSTRALIA, 21 CARTWRIGHT
DRIVE, FORRESTDAL, WA 6112,
OPERATIONS@TREESWEST.COM.AU

Document Purpose	A detailed assessment of the species, size and health of the trees and vegetation, including identifying trees and/or vegetation.
Consultant Arborist\ Report writer.	James Charlton, BA Hons, GDL.
Supervising consultant Arborist	Dave Crispin, Trees West Australia, Senior Arborist AQF Level 5, Dip. Hort, Arb.
Site Survey Date	28 Th March 2025

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1. Introduction

The report has been prepared at the request of Harley Dykstra, Lawrence Ko, Planning Consultant. The report is a detailed assessment of the species, size and health of the trees and vegetation in the area as identified in section 2 of this report.

2. Arboricultural overview.

Benefits of Trees

The benefits of trees extend beyond their beauty. Trees planted today will offer social, environmental, and economic benefits in the future. Humans feel a calming effect from being near trees, it connects us with our past, back in nature. The serenity we feel can significantly reduce stress, fatigue, and even decrease recovery time from surgery and illness. Green spaces may also help lower the level of crime within urban environments.

Communal Benefits

With proper selection and maintenance trees on private property can provide as many benefits to the community as trees in public spaces. Trees provide privacy, accentuate views, reduce noise, and glare and soften architecture. Natural elements and wildlife are brought into the urban environment by the presence of trees, which increases the quality of life for residents within the community.

Environmental Benefits

Trees alter the environment we live in by moderating climate, improving air quality, reducing stormwater runoff, and providing habitat for wildlife. Examples of the environmental benefits of trees: Trees moderate high temperatures by shading areas, cooling and moderating heat radiated from urban buildings, structures, and surfaces. Dense or layered foliage may serve as a windbreak, as well as provide protection from rainfall. Leaves and bark capture and contain dust from the atmosphere. Leaves filter the air we breathe, removing airborne particulates whilst releasing oxygen.

Economic Benefits

The economic benefits of trees are both direct and indirect. Property values of landscaped homes are typically higher than those of non-landscaped homes based on the species, size, condition, and location of the trees included in the landscape. Trees also provide shade which can lower cooling costs for your home in summer and reduce heating costs in winter by acting as a windbreak.

Maximising the Benefits of Trees

Trees provide numerous benefits but, in order to maximise those benefits, routine maintenance is required. Although benefits begin the moment a young tree is planted, they are minimal compared to the benefits a mature tree offers. The costs associated with removing a large tree and planting a young tree can outweigh the costs of regular tree maintenance practices such as: tree inspections, remedial pruning and mulching.

3. Site Details

The area to be surveyed is the section within the area outlined in red at 8 Wygonda Road, Roleystone. The area for survey was set out by Lawrence Ko Planning Consultants.



4. Method of assessment

Equipment

The tree assessment was carried out on the 28th March 2025 at ground level by James Charlton, consulting Arborist for Treeswest Australia. The weather throughout the period was mainly sunny, the temperature was around 28 - 32 deg Celsius with little, to no wind. The assessments were carried out between 07:00hrs and 13:00hrs. The trees were able to be viewed onsite, without impediment. Photographs were taken with an iPhone 11. Equipment used a Nikon clinometer, 8m retractable diameter tape, trenching shovel, long handled screwdriver, a penetrometer for probing, and a nylon tapping hammer. Data was recorded on a Panasonic toughpad using Treeplotter software.

Visual Tree Assessment

All trees were assessed using the Visual Tree Assessment methodology framework in Treeplotter. The VTA (Visual Tree Assessment) method is an internationally recognised and acknowledged method for tree inspection. Hazardous symptoms are interpreted, defects are confirmed and measured and criteria of failure are assessed. VTA helps to distinguish between apparent hazardous trees from those that are hazardous. This method reduces the risk of removing a viable tree. VTA gives information about the body language and the mechanics of trees. The VTA method is thus neither tree-friendly nor tree-hostile. The VTA method identifies structural defects or abnormalities which will reduce the mechanical stability of a given branch or stem resulting in a higher likelihood of failure. In the event of damage, this method enables a largely fair judgment to be reached. Claus Mattheck introduced a biomechanically based system of visual tree assessment (VTA), which uses the reactive nature of tree growth. The basis behind VTA is the identification of symptoms, which the tree produces in reaction to a weak spot, or area of mechanical stress.

5. Summary of Findings



Tree ID	Botanical Name	Common Name	Health	Structure	DBH [mm]	Spread (m)	SULE	Retention Value
1	Eucalyptus marginata	Jarrah	Good	Fair	320	3	40+ yrs	High
2	Eucalyptus marginata	Jarrah	Good	Good	318	8	40+ yrs	High
3	Xanthorrhoea preissii	Grass Tree	Good	Good	300	1	40+ yrs	Very High
4	Corymbia calophylla	Marri	Fair	Good	340	8	40+ yrs	Very High
5	Corymbia calophylla	Marri	Good	Good	220	4	40+ yrs	Very High
6	Banksia grandis	Banksia	Good	Good	100	2	21-40 yrs	High
7	Eucalyptus marginata	Jarrah	Good	Good	295	8	40+ yrs	Very High
8	Xanthorrhoea preissii	Grass Tree	Good	Good	250	1	40+ yrs	Very High
9	Corymbia calophylla	Marri	Good	Good	520	11	40+ yrs	Very High
10	Corymbia calophylla	Marri	Good	Poor	340	10	40+ yrs	High
11	Corymbia calophylla	Marri	Good	Good	600	12	40+ yrs	Very High
12	Corymbia calophylla	Marri	Fair	Fair	470	10	40+ yrs	High
13	Corymbia calophylla	Marri	Good	Good	660	15	40+ yrs	Very High
14	Corymbia calophylla	Marri	Dead	Poor	320	2	0 yrs	Medium
15	Pinus pinaster	Maritime Pine	Good	Good	450	6	40+ yrs	Very High
16	Corymbia calophylla	Marri	Good	Good	96	22	40+ yrs	Very High
17	Xanthorrhoea preissii	Grass Tree	Good	Good	30	1	40+ yrs	Very High

The site comprises of 9 *Corymbia calophylla* (Marri trees), 3 *Eucalyptus marginata* (Jarrah) a Pine and grass trees. These trees are of high value for habitable and food source for native species. The tree are predominantly formed with canopy dominant to the west (towards the car park) due to natural growth to light source. Some scorching is visible at the base of the trees, possibly due to controlled burns, but this has not negatively impacted on the trees health. The trees have high retention value in their current state. Some of the trees identified with a more predominant lean to the west may need pruning work to balance the canopy, this will be dependent on the intended use of the area to the west and can be risk assessed based on that intended use. The Grass trees are able to be transplanted and retained should there be a need to disturb them, care would need to be taken if doing so due to the proximity within root zones of other trees.

6. Tree root protection and development

Root Protection on Development Sites:

AS4970 (Australian Standard for Protection of Trees on Development Sites) outlines a method to measure the nominal Tree Protection Zones (TPZ's) and Structural Root Zones (SRZ's) to allow assessment of potential impacts to trees.

The TPZ is a specified area above and below ground and at a given distance from the trunk set aside for the protection of a tree's roots and crown to provide for the viability and stability of a tree to be retained where it is potentially subject to damage by development. TPZ's are calculated using the trees diameter at breast height (DBH), measured at 1.4m above ground level.

The SRZ is the area around the base of a tree required for the tree's stability in the ground. The woody root growth and soil cohesion in this area are necessary to hold the tree upright. The SRZ is nominally circular with the trunk at its centre and is expressed by its radius in metres. SRZ's are calculated using the trees diameter at ground level (DGL), above the root buttress.

For example a tree that has a diameter at ground level (DGL) of 60cm, therefore has a TPZ of 7.2 radius and an SRZ of 1.5m radius. For works to be undertaken without compromising that tree, an arborist must ensure that the tree will remain viable.

Tree roots perform two primary functions, absorb water and solutes from the soil and provide anchorage. The inspected tree has a significantly reduce sail and low statics metric i.e. short, wide trunk. Therefore, it is this consultant's opinion that root loss within the excavation site won't compromise the trees stability.

The tree is in adequate health however a reduction in the trees capacity to absorb water will have an effect in the warmer months. Should significant root loss occur, supplementary water will be required to increase soil moisture and allow the tree to recover. The amount of water required and at what interval, will be determined by the extent of root loss. Any watering should occur within the trees drip line.

Damaged roots require resource allocation for their repair. Damage can be limited by cleanly pruning any exposed roots, to ensure tissue is not torn or that soil cohesion is not unnecessarily affected.

The following table settings out SRZ and RPZ for the assessed trees..

Tree ID	Botanical Name	Common Name	DBH [mm]	Spread (m)	Root Protection Zone Radius (m)	Structural Root Zone, Radius (m)
1	Eucalyptus marginata	Jarra	320	3	3.8	2.1
2	Eucalyptus marginata	Jarra	318	8	3.8	2.1
3	Xanthorrhoea preissii	Grass Tree	300	1		
4	Corymbia calophylla	Marri	340	8	4.1	2.1
5	Corymbia calophylla	Marri	220	4	2.6	1.8
6	Banksia grandis	Banksia	100	2		
7	Eucalyptus marginata	Jarra	295	8	3.5	2.0
8	Xanthorrhoea preissii	Grass Tree	250	1		
9	Corymbia calophylla	Marri	520	11	6.2	2.5
10	Corymbia calophylla	Marri	340	10	4.1	2.1
11	Corymbia calophylla	Marri	600	12	7.2	2.7
12	Corymbia calophylla	Marri	470	10	5.6	2.4
13	Corymbia calophylla	Marri	660	15	7.9	2.8
14	Corymbia calophylla	Marri	320	2	3.8	2.1
15	Pinus pinaster	Maritime Pine	450	6	5.4	2.4
16	Corymbia calophylla	Marri	960	22	11.5	3.3
17	Xanthorrhoea preissii	Grass Tree	300	1		

All tree other than the Xanthorrhoea (grass trees) have a metal oval id tag affixed at approximately 1.5m above ground level on the North facing side. This has been done to assist in identifying the tree to ensure the SRZ and SRZ can be correctly applied.

7. Scope of Report

This report has not been designed as a hazard assessment or safety report and should not be used as such. As such only major visual tree defects are commented upon where appropriate. This report makes no comment on any trees ability to cause either direct or indirect damage to buildings, walkways and other utilities other than where direct pressure damage is immediately and obviously foreseeable. Trees are dynamic and changing structures and this report comments on tree condition as assessed on the day of surveying. Further to this report it is recommended that all trees in areas where failure may result in significant risk of damage to people or property be assessed for hazard on an annual basis in order to fulfil the owner's duty of care.

8. Limitation of Liability

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Appendix 1: Tree Details

Jarrah Tree ID #1

Tree Details	
Botanical Name:	Eucalyptus marginata
Common Name:	Jarrah
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	
DBH [mm]:	
Risk Rating:	Low
Priority of works:	None
Spread (m):	3
SULE:	40+ yrs
Comments (assessment):	Bifurcation at 3m, suppressed tree leaning to W.
Recommended Works:	Nil
Last Modified:	03/04/2025
Comments (works):	No work

Tree Location	
Longitude:	116.072032
Latitude:	-32.113209
Land Use:	
City:	Roleystone

Photos



WIN_20250328_08_06_03_Pro.jpg
28/03/2025

Jarrah Tree ID #2

Tree Details	
Botanical Name:	Eucalyptus marginata
Common Name:	Jarrah
Health:	Good
Status:	Alive
No. Stems (multi):	Multiple Stems
DBH [in]:	12.501187852999998
DBH [mm]:	317.53
Risk Rating:	Low
Priority of works:	None
Spread (m):	8
SULE:	40+ yrs
Comments (assessment):	Bifurcated stem included bark but sound union. Suppressed tree. Good structure no sign of pathogens. Crown dominant to the west.
Recommended Works:	Nil
Last Modified:	03/04/2025
Comments (works):	No work

Tree Location

Longitude:	116.071978
Latitude:	-32.113274
Land Use:	
City:	Roleystone

Photos



WIN_20250328_08_20_11_Pro.jpg
28/03/2025

Gr ss tr Tree ID #3

Tree Details	
Botanical Name:	Xanthorrhoea preissii
Common Name:	Grass tree
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	11.811029999999999
DBH [mm]:	300
Risk Rating:	Low
Priority of works:	None
Spread (m):	1
SULE:	40+ yrs
Comments (assessment):	High value grass trees. 2 trees. Recommend transplant of both if development enchromes are.
Recommended Works:	Nil
Last Modified:	03/04/2025
Comments (works):	No work

Tree Location

Longitude:	116.072024
Latitude:	-32.113330
Land Use:	
City:	Roleystone

Photos



WIN_20250328_08_27_46_Pro.jpg
28/03/2025

Marri Tree ID #4

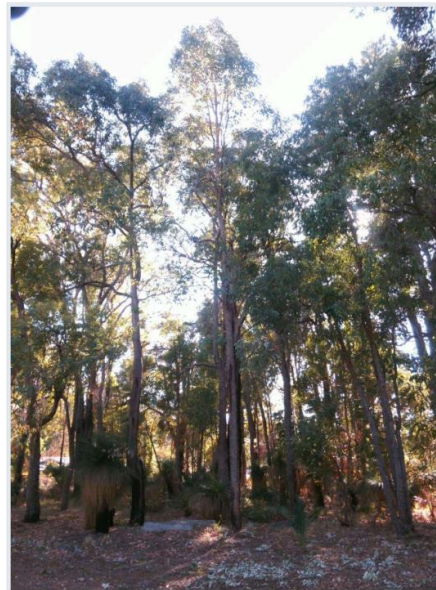
Tree Details		Tree Location	
Botanical Name:	Corymbia calophylla	Longitude:	116.072036
Common Name:	Marri	Latitude:	-32.113301
Health:	Fair	Land Use:	
Status:	Alive	City:	Roleystone
No. Stems (multi):	1	Photos  WIN_20250328_08_41_17_Pro.jpg 28/03/2025	
DBH [in]:	13.385834		
DBH [mm]:	340		
Risk Rating:	Low		
Priority of works:	None		
Spread (m):	8		
SULE:	40+ yrs		
Comments (assessment):	Crown predominantly to west. Signs of scorch/charring at base, likely caused by control burn, no detriment to tree health. Signs of exudate from 4m to base. Minimal deadwood, all under 5cm diameter.		
Recommended Works:	Nil		
Last Modified:	03/04/2025		
Comments (works):	No work		

M rri Tr ID #5

Tree Details	
Botanical Name:	Corymbia calophylla
Common Name:	Marri
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	8.661422
DBH [mm]:	220
Risk Rating:	Low
Priority of works:	None
Spread (m):	4
SULE:	40+ yrs
Comments (assessment):	Crown predominantly to west on Lower canopy, upper canopy has even spread. Good upright growth no predominant lean. Signs of exudate on lower steam but only one location at approximately 3m on east side, recent.
Recommended Works:	Nil
Last Modified:	03/04/2025
Comments (works):	No work

Tree Location	
Longitude:	116.072041
Latitude:	-32.113356
Land Use:	
City:	Roleystone

Photos



WIN_20250328_08_53_50_Pro.jpg
28/03/2025

Bull banksia Tree ID #6

Tree Details	
Botanical Name:	Banksia grandis
Common Name:	Bull banksia
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	
DBH [mm]:	
Risk Rating:	Low
Priority of works:	None
Spread (m):	2
SULE:	21-40 yrs
Comments (assessment):	3 banksia bushes all 9m from curb line. Signs of slight die back on some of the lower leaves, new growth is good. signs of past pruning.
Recommended Works:	Nil
Last Modified:	28/03/2025
Comments (works):	No work

Tree Location

Longitude:	116.072028
Latitude:	-32.113378
Land Use:	
City:	Roleystone

Photos



WIN_20250328_09_09_12_Pro.jpg
28/03/2025

Jarrah Tree ID #7

Tree Details		Tree Location	
Botanical Name:	Eucalyptus marginata	Longitude:	116.072043
Common Name:	Jarrah	Latitude:	-32.113392
Health:	Good	Land Use:	
Status:	Alive	City:	Roleystone
No. Stems (multi):	Multiple Stems	Photos 	
DBH [in]:	11.605911779		
DBH [mm]:	294.79		
Risk Rating:	Low		
Priority of works:	None		
Spread (m):	8		
SULE:	40+ yrs		
Comments (assessment):	5 steams, signs of regrowth with main steam having been previously cut at ground level. Unions are sound but not primary growth. Potential for unions to lack strength as tree increases in size.	WIN_20250328_09_21_17_Pro.jpg 28/03/2025	
Recommended Works:	Nil		
Last Modified:	28/03/2025		
Comments (works):	No work		



WIN_20250328_09_21_33_Pro.jpg
28/03/2025

Gr ss tr Tree ID #8

Tree Details	
Botanical Name:	Xanthorrhoea preissii
Common Name:	Grass tree
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	
DBH [mm]:	
Risk Rating:	Low
Priority of works:	None
Spread (m):	1
SULE:	40+ yrs
Comments (assessment):	Low level grass tree, recommend transplanting.
Recommended Works:	Nil
Last Modified:	28/03/2025
Comments (works):	No work

Tree Location	
Longitude:	116.072027
Latitude:	-32.113407
Land Use:	
City:	Roleystone

Photos



WIN_20250328_09_26_53_Pro.jpg
28/03/2025

9

Tree Details		Tree Location	
Botanical Name:	Corymbia calophylla	Longitude:	116.072043
Common Name:	Marri	Latitude:	-32.113414
Health:	Good	Land Use:	
Status:	Alive	City:	Roleystone
No. Stems (multi):	1	Photos  WIN_20250328_09_44_10_Pro.jpg 28/03/2025	
DBH [in]:	20.472452		
DBH [mm]:	520		
Risk Rating:	Low		
Priority of works:	None		
Spread (m):	11		
SULE:	40+ yrs		
Comments (assessment):	A well established tree with good even canopy growth. Some slight deadwood 4cm in Diameter or less. Signs of exuda, possible avian damage in Mid canopy but minor. Crown slightly bias to the west. sighs of minor scorching at the base.		
Recommended Works:	Nil		
Last Modified:	10/04/2025		
Comments (works):	No work		

0

Tree Details	
Botanical Name:	Corymbia calophylla
Common Name:	Marri
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	13.385834
DBH [mm]:	340
Risk Rating:	Low
Priority of works:	None
Spread (m):	10
SULE:	40+ yrs
Comments (assessment):	Heavy lean to the north west on main stem. Suppressed growth and under development of canopy on eastern aspect. Slight fire damage to bark at base and extending to 3m on west side. Slight exudate. Possible hollow on upper side of Eastern most limb, 1m above first union.
Recommended Works:	Nil
Last Modified:	10/04/2025
Comments (works):	No work

Tree Location	
Longitude:	116.072041
Latitude:	-32.113467
Land Use:	
City:	Roleystone

Photos



WIN_20250328_09_57_15_Pro.jpg
28/03/2025

WIN_20250328_09_57_15_Pro.jpg
28/03/2025

1

Tree Details	
Botanical Name:	Corymbia calophylla
Common Name:	Marri
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	23.622059999999998
DBH [mm]:	600
Risk Rating:	Low
Priority of works:	None
Spread (m):	12
SULE:	40+ yrs
Comments (assessment):	Slight fire scorching at base, superficial. Extending limb to east at 10m sound union from ground inspection. Minimal deadwood in upper canopy 10cm in diameter and less. Slight lean on main stem to NNE.
Recommended Works:	Nil
Last Modified:	10/04/2025
Comments (works):	No work

Tree Location	
Longitude:	116.072016
Latitude:	-32.113502
Land Use:	
City:	Roleystone

Photos



WIN_20250328_10_15_13_Pro.jpg
28/03/2025

2

Tree Details	
Botanical Name:	Corymbia calophylla
Common Name:	Marri
Health:	Fair
Status:	Alive
No. Stems (multi):	1
DBH [in]:	18.503947
DBH [mm]:	470
Risk Rating:	Low
Priority of works:	None
Spread (m):	10
SULE:	40+ yrs
Comments (assessment):	Slight fire scorching at base, superficial. Historical damage to NE side of main stem from ground level to 2.5m possible deterioration of heartwood l. This area. Signs of borer Beatle. Die back on lower limb and dead wood 14cm l. Diameter and less. Crown growth predominately to the north. Upper crown in Good heath.
Recommended Works:	Nil
Last Modified:	28/03/2025
Comments (works):	No work

Tree Location	
Longitude:	116.072050
Latitude:	-32.113508
Land Use:	
City:	Roleystone

Photos	
There are no saved photos for this feature.	

3

Tree Details		Tree Location	
Botanical Name:	Corymbia calophylla	Longitude:	116.071938
Common Name:	Marri	Latitude:	-32.113550
Health:	Good	Land Use:	
Status:	Alive	City:	Roleystone
No. Stems (multi):	1	Photos  WIN_20250328_10_47_05_Pro.jpg 28/03/2025	
DBH [in]:	25.984265999999998		
DBH [mm]:	660		
Risk Rating:	Low		
Priority of works:	None		
Spread (m):	15		
SULE:	40+ yrs		
Comments (assessment):	Some minor exuda. No fire scorching. Some deadwood in Upper canopy 8_10cm diameter. Main canopy growth is on Se and NE aspect. 6th union at 17m shows signs of a historical limb failure, small detached branch currently hung up in this union.		
Recommended Works:	Nil		
Last Modified:	28/03/2025		
Comments (works):	No work		

4

Tree Details		Tree Location	
Botanical Name:	Corymbia calophylla	Longitude:	116.071970
Common Name:	Marri	Latitude:	-32.113559
Health:	Dead	Land Use:	
Status:	Dead	City:	Roleystone
No. Stems (multi):	1	Photos	
DBH [in]:	12.598431999999999		
DBH [mm]:	320	There are no saved photos for this feature.	
Risk Rating:	High		
Priority of works:	None		
Spread (m):	2		
SULE:	0 yrs		
Comments (assessment):	Dead tree, u sound. Possible value I. Retaining lower section as habitat.		
Recommended Works:	Nil		
Last Modified:	28/03/2025		
Comments (works):	No work		

it m Pine Tree ID #15

Tree Details	
Botanical Name:	Pinus pinaster
Common Name:	Maritime Pine
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	17.716545
DBH [mm]:	450
Risk Rating:	Low
Priority of works:	None
Spread (m):	6
SULE:	40+ yrs
Comments (assessment):	Drawn growth with possibly underdeveloped canopy. Tree is in Good health with shorter limbs than may otherwise have developed due to close proximity to other trees. Still retains good canopy volume.
Recommended Works:	Nil
Last Modified:	10/04/2025
Comments (works):	No work

Tree Location	
Longitude:	116.071989
Latitude:	-32.113576
Land Use:	
City:	Roleystone

Photos



WIN_20250328_11_01_56_Pro.jpg
28/03/2025

r Tr ID #16

Tree Details	
Botanical Name:	Corymbia calophylla
Common Name:	Marri
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	95.98430379999999
DBH [mm]:	2438
Risk Rating:	Moderate
Priority of works:	None
Spread (m):	22
SULE:	40+ yrs
Comments (assessment):	Large developed canopy. Some dead branches 20cm and less in upper canopy above building and car park. Possible hollows in upper canopy possible nesting sight, unclear from ground inspection. First union has included bark, unable to inspect from ground. Slight die back in Limb to South in tips only. Small deadwood 5cm and less throughout tree. Aerial inspection of first union and limb over building may be advisable.
Recommended Works:	Nil
Last Modified:	10/04/2025
Comments (works):	No work

Tree Location	
Longitude:	116.071848
Latitude:	-32.113615
Land Use:	
City:	Roleystone

Photos



WIN_20250328_12_02_35_Pro.jpg
28/03/2025



WIN_20250328_12_03_09_Pro.jpg
28/03/2025



WIN_20250328_12_03_32_Pro.jpg
28/03/2025

Grass tre Tree ID #17

Tree Details	
Botanical Name:	Xanthorrhoea preissii
Common Name:	Grass tree
Health:	Good
Status:	Alive
No. Stems (multi):	1
DBH [in]:	1.181103
DBH [mm]:	30
Risk Rating:	Low
Priority of works:	None
Spread (m):	1
SULE:	40+ yrs
Comments (assessment):	Transplant recommended
Recommended Works:	Nil
Last Modified:	28/03/2025
Comments (works):	No work

Tree Location	
Longitude:	116.071964
Latitude:	-32.113519
Land Use:	
City:	Roleystone

Photos



WIN_20250328_12_09_51_Pro.jpg
28/03/2025



HARLEY DYKSTRA
PROPOSED PLACE OF WORSHIP

SPOKEN WORD FELLOWSHIP INC
8 WYGONDA PLACE, ROLEYSTONE

ENVIRONMENTAL ACOUSTIC ASSESSMENT
NOISE MANAGEMENT PLAN

MARCH 2025

OUR REFERENCE: 34369-5-25121

Herring Storer Acoustics

DOCUMENT CONTROL PAGE

ACOUSTIC ASSESSMENT SPOKEN WORD FELLOWSHIP INC 8 WYGONDA PLACE, ROLEYSTONE

Job No: 25121

Document Reference: 34369-4-25121

FOR

HARLEY DYKSTRA

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This report has been prepared in accordance with the scope of services and on the basis of information and documents provided to Herring Storer Acoustics by the client. To the extent that this report relies on data and measurements taken at or under the times and conditions specified within the report and any findings, conclusions or recommendations only apply to those circumstances and no greater reliance should be assumed. The client acknowledges and agrees that the reports or presentations are provided by Herring Storer Acoustics to assist the client to conduct its own independent assessment.

Herring Storer Acoustics

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B	Noise Contours

Herring Storer Acoustics
Our ref: 34369-5-25121

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1. INTRODUCTION

Herring Storer Acoustics were commissioned by Harley Dykstra on behalf of the Spoken Word Fellowship Inc to undertake an acoustic assessment of noise emissions associated with the change of use of the existing commercial premises located at 8 Wygonda Road, Roleystone to a place of worship.

This report assesses noise emissions from the premises with regards to compliance with the requirements of the *Environmental Protection (Noise) Regulations 1997* as requested by Council for the Change of Use.

It is understood that the development is to consist of a church meeting hall, therefore noise sources considered as part of this assessment include:

- Singing Music Inside.
- Plant by way of the air conditioning.
- Car movements on site.

Information provided for the operating conditions of the proposed development are for a 100-120 person Sunday Service at 10AM, as well as general activities and gatherings at other times.

For information, the site plan for the proposed development is attached in Appendix A.

2. SUMMARY

For this development, noise received at the neighbouring residences, complies with the requirements of the *Environmental Protection (Noise) Regulations 1997* at all times, given the implementation of the barrier mentioned in Section 5. It is noted that the location of exceedances without the barrier is currently used as Commercial, however zoned as Residential, and the as of such the Church could operate without the barrier, until the usage becomes Residential, if approved by the City of Armadale.

It is understood that the church would primarily utilised during Sunday at 10AM, however other general activities and gatherings could potentially fall outside of this core usage.

3. CRITERIA

3.1 ENVIRONMENTAL PROTECTION (NOISE) REGULATIONS 1997

The allowable noise level at the surrounding locales is prescribed by the *Environmental Protection (Noise) Regulations 1997*. Regulations 7 & 8 stipulate maximum allowable external noise levels determined by the calculation of an influencing factor, which is then added to the base levels shown below. The influencing factor is calculated for the usage of land within two circles, having radii of 100m and 450m from the premises of concern.

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TABLE 3.1 - BASELINE ASSIGNED OUTDOOR NOISE LEVEL

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L _{A10}	L _{A1}	L _{Amax}
Noise sensitive premises: highly sensitive area	0700 - 1900 hours Monday to Saturday (Day)	45 + IF	55 + IF	65 + IF
	0900 - 1900 hours Sunday and Public Holidays (Sunday / Public Holiday Day)	40 + IF	50 + IF	65 + IF
	1900 - 2200 hours all days (Evening)	40 + IF	50 + IF	55 + IF
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays (Night)	35 + IF	45 + IF	55 + IF
Noise sensitive premises: any area other than highly sensitive area	All hours	60	75	80
Commercial premises	All hours	60	75	80

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

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

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

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

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

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

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

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

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

TABLE 3.2 - ADJUSTMENTS TO MEASURED LEVELS

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

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

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Where the noise emission is music, then any measured level is adjusted according to Table 3.3 below.

TABLE 3.3 – ADJUSTMENTS TO MEASURED MUSIC NOISE LEVELS

Where impulsiveness is not present	Where impulsiveness is present
+10 dB(A)	+15 dB(A)

For this development, the closest residential premises have been identified as indicated on Figure 3.1. For a given area, the highest noise level at any individual resident or location has been used to represent that location.

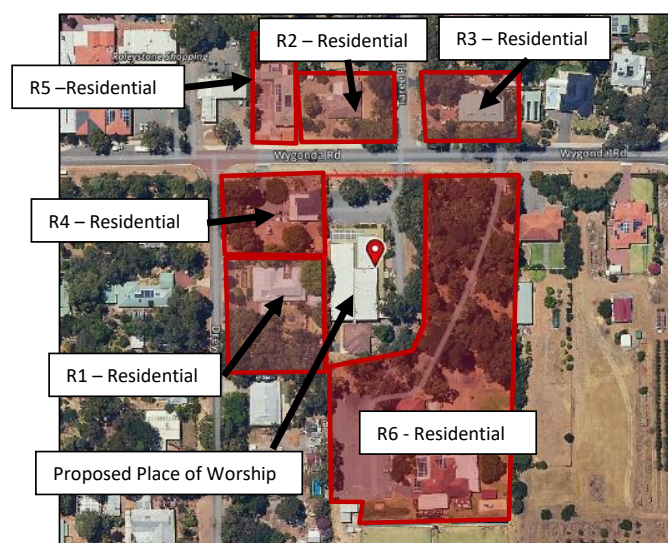


FIGURE 3.1 – NEAREST PREMISES

Based on the results of the noise modelling, the influencing factor (IF) at the worst-case locations, as indicated on Figure 3.1 has been conservatively estimated as listed in Table 3.4.

TABLE 3.4 – INFLUENCING FACTORS

IF Factor Parameter	IF Factor (dB)
Commercial Premises within the inner circle	30% = 1.5
Commercial Premises within the outer circle	10% = 0.5
TOTAL IF	+2.0

Based on the above influencing factor, the assigned outdoor noise levels for the neighbouring residential locations are listed in Table 3.5.

TABLE 3.5 - ASSIGNED OUTDOOR NOISE LEVEL

Premises Receiving Noise	Time of Day	Assigned Level (dB)		
		L _A 10	L _A 1	L _A max
Noise sensitive premises: Highly sensitive area	0700 - 1900 hours Monday to Saturday	47	57	67
	0900 - 1900 hours Sunday and Public Holidays	42	52	67
	1900 - 2200 hours all days	42	52	57
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and Public Holidays	37	47	57
Commercial Premises	All Hours	60	75	80

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

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Additional to the above, with regards to vehicles accessing the site, we note that as anyone can access the site and the operators of the premises have no control on who can enter the car park these areas would be designated as public places. Regulation 6 of the *Environmental Protection (Noise) Regulations 1997* relates to noise emissions from public places and under this Regulation, "the person who is causing or permitting that noise to be emitted is to be treated as the occupier...".

Therefore, noise emissions from each individual vehicle using the car park needs to comply with the assigned noise levels.

Similarly, as any given individual could be attending the Spoken Word Fellowship premises or the adjacent commercial facilities, noise emissions from cars parking on the road has not been assessed to these locations.

4. MODELLING

Predictive noise modelling has been undertaken for noise emissions from the proposed development onto the surrounding noise sensitive receptors.

4.1 NOISE EMISSIONS

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

To determine the noise received at the neighbouring premises, noise modelling was undertaken for the following scenarios:

- 1 Singing / Amplified Music Inside.
- 2 Plant; air conditioning.
- 3 Car movements on site.
- 4 Cars starting and doors closing.

With regards to noise emissions, the following are noted:

- 1 For the modelling of cars, the noise sources (ie cars) were located at the parking bays. Thus, ensuring noise modelling was undertaken for the worst-case locations.
- 2 Noise associated with the mechanical services does not take into account any diversity of operation. Such diversity would occur during the night period. Thus, this is a conservative assessment.

The calculations were based on sound power levels and sound pressure levels listed in Table 4.1.1.

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TABLE 4.1.1 – GENERAL SOUND POWER / SOUND PRESSURE LEVELS

Item of Equipment	Sound Power Level, (dB(A))
Cars moving	79
Car Start	85
Car Door	87
Air Conditioning Units	As per existing
Singing / Music Inside (Amplified)	98
Singing (Unamplified)	75/m ²

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

L _{A10}	-	Mechanical services and Music / Singing.
L _{A1}	-	Car movements.
L _{AMax}	-	Car engine starts and doors closing.

It is noted that Mechanical Services would potentially attract a +5 penalty for “Tonality”, Music/Singing a +10 penalty for “Music where impulsiveness is not present” and Car Doors a +10 penalty for “Impulsiveness”.

5. ASSESSMENT

5.1 L_{A10} NOISE EMISSIONS

Noise emissions from the mechanical services would be steady state and would operate continuously. These emissions have been assessed against L_{A10} criteria for all hours in the HSA Addendum 35099-3-25121

Noise emissions from singing/music would be present for more than 10% of the representative period. These emissions have been assessed against the L_{A10} criteria for all hours.

As unamplified singing falls under the “Call to Worship” and is confined to the inside the facility. Thus, these emissions would comply with the *Environmental Protection (Noise) Regulations 1997*.

Amplified music would be confined to the inside the facility and would not be audible outside of the building if the doors and windows are closed and thus would comply with the *Environmental Protection (Noise) Regulations 1997*

Note, if required a noise management plan can be utilised for when amplified music is being produced to ensure that the doors and windows remain closed.

5.2 L_{A1} NOISE EMISSIONS

Noise emissions from car movements on site need to comply with the assigned L_{A1} noise level. However, as under the Regulations, each of these sources needs to be considered individually, it is the highest calculated noise levels used for assessment, rather than the cumulative overall noise levels. These emissions have been assessed against L_{A1} criteria for all hours.

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**TABLE 5.2.1 - ACOUSTIC MODELLING RESULTS L_{A1} CRITERIA
CAR MOVING**

Neighbouring Premises	Calculated Noise Level (dB(A))	
	Unbarriered	Barriered
R1 Residential	41	34
R2 Residential	40	40
R3 Residential	39	39
R4 Residential	59	47
R3 Residential	37	37
R4 Residential	34	34

**TABLE 5.2.2 – ASSESSMENT OF L_{A1} NIGHT PERIOD NOISE LEVEL EMISSIONS
CAR MOVEMENTS UNBARRIERED**

Location	Assessable Noise Level dB(A)	Applicable Assigned Noise Level (dB(A))	Exceedance to Assigned Noise Level
R1 Residential	41	47	Complies
R2 Residential	40	47	Complies
R3 Residential	39	47	Complies
R4 Residential	59	47	+12
R5 Residential	37	47	Complies
R6 Residential	34	47	Complies

**TABLE 5.2.3 – ASSESSMENT OF L_{A1} NIGHT PERIOD NOISE LEVEL EMISSIONS
CAR MOVEMENTS BARRIERED**

Location	Assessable Noise Level dB(A)	Applicable Assigned Noise Level (dB(A))	Exceedance to Assigned Noise Level
R1 Residential	34	47	Complies
R2 Residential	40	47	Complies
R3 Residential	39	47	Complies
R4 Residential	47	47	Complies
R5 Residential	37	47	Complies
R6 Residential	34	47	Complies

Based on the above, noise associated with car movements from the proposed place of worship would comply at all hours unbarriered except for R4. To comply at R4, implementation of a minimum 1800mm solid continuous barrier for the area adjacent to the carpark is required. It is noted that whilst the underlying zoning of R4 is residential, the current usage is commercial which when treated as such., when unbarriered would comply with the regulations. Noise contours are presented in Appendix B for completeness, noting they are only to be used as a visual guide, and not for assessment purposes.

5.3 L_{AMAX} NOISE EMISSIONS

Noise emissions from car doors and starts on site need to comply with the assigned L_{AMax} noise level. However, as under the Regulations, each of these sources needs to be considered individually, it is the highest calculated noise levels used for assessment, rather than the cumulative overall noise levels. These emissions have been assessed against L_{AMax} criteria for the most stringent time periods with adjustment for impulsivity shown in [] brackets.

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Our ref: 34369-5-25121

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**TABLE 5.3.1 - ACOUSTIC MODELLING RESULTS $L_{A\text{Max}}$ CRITERIA
CAR START / DOOR CLOSING**

Neighbouring Premises	Calculated Noise Level (dB(A))			
	Car Start	Car Start Barriered/Bays Restricted	Car Door	Car Door Barriered/Bays Restricted
R1 Residential	47	47	47 [57]	41 [51]
R2 Residential	44	44	45 [55]	45 [55]
R3 Residential	39	39	41 [51]	41 [51]
R4 Residential	66	49	67 [77]	45 [55]
R5 Residential	44	44	45 [55]	44 [54]
R6 Residential	38	38	39 [49]	39 [49]

**TABLE 5.3.2 – ASSESSMENT OF $L_{A\text{Max}}$ NIGHT PERIOD NOISE LEVEL EMISSIONS
CAR START**

Location	Assessable Noise Level dB(A)	Applicable Assigned Noise Level (dB(A))	Exceedance to Assigned Noise Level
R1 Residential	47	57	Complies
R2 Residential	44	57	Complies
R3 Residential	39	57	Complies
R4 Residential	66	57	+9
R5 Residential	44	57	Complies
R6 Residential	38	57	Complies

**TABLE 5.3.3 – ASSESSMENT OF $L_{A\text{Max}}$ NIGHT PERIOD NOISE LEVEL EMISSIONS
CAR START BARRIERED / BAYS RESTRICTED**

Location	Assessable Noise Level dB(A)	Applicable Assigned Noise Level (dB(A))	Exceedance to Assigned Noise Level
R1 Residential	47	57	Complies
R2 Residential	44	57	Complies
R3 Residential	39	57	Complies
R4 Residential	49	57	Complies
R5 Residential	44	57	Complies
R6 Residential	38	57	Complies

**TABLE 5.3.4 – ASSESSMENT OF $L_{A\text{Max}}$ NIGHT PERIOD NOISE LEVEL EMISSIONS
CAR DOOR**

Location	Assessable Noise Level dB(A)	Applicable Assigned Noise Level (dB(A))	Exceedance to Assigned Noise Level
R1 Residential	57	57	Complies
R2 Residential	55	57	Complies
R3 Residential	51	57	Complies
R4 Residential	77	57	+20
R5 Residential	55	57	Complies
R6 Residential	49	57	Complies

Herring Storer Acoustics
Our ref: 34369-5-25121

8

**TABLE 5.3.5 – ASSESSMENT OF $L_{A\text{Max}}$ NIGHT PERIOD NOISE LEVEL EMISSIONS
CAR DOOR BARRIERED / BAYS RESTRICTED**

Location	Assessable Noise Level dB(A)	Applicable Assigned Noise Level (dB(A))	Exceedance to Assigned Noise Level
R1 Residential	51	57	Complies
R2 Residential	55	57	Complies
R3 Residential	51	57	Complies
R4 Residential	55	57	Complies
R5 Residential	54	57	Complies
R6 Residential	49	57	Complies

Noise associated with car door starts would comply with the Environmental Protection (Noise) Regulations 1997 during the day time period, however not during the other time periods.

Similarly, noise associated with car door slamming would comply with the Environmental Protection (Noise) Regulations 1997 during the day time period, however not during the other time periods.

As with the assessment of cars, to comply at R4, implementation of a minimum 1800mm solid continuous barrier for the area adjacent to the carpark is required as well as a restriction of the four westmost car bays outside of the day time period. Once again, it is noted that whilst the underlying zoning of R4 is residential, the current usage is commercial and if treated as such, when unbarriered would comply with the regulations.

Noise contours are presented in Appendix B for completeness, noting they are only to be used as a visual guide, and not for assessment purposes.

6. CONCLUSION

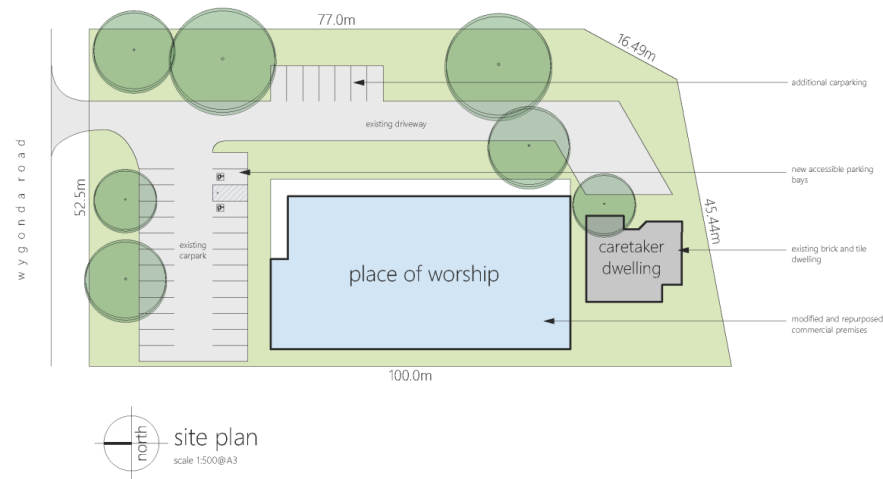
Based on the above, all operations associated with the proposed place of worship would comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* if the car operations are appropriately managed.

If the western barrier is to be implemented, it must be solid and continuous with no gaps. For this wall colorbond is a suitable material, or any other wall with a superior surface density. The wall must extend at minimum equal with the buildings north façade, as far north as practicable.

Despite obtaining compliance, it is still recommended that the operations of the place of worship be done in the quietest methodology where practicable, and if necessary, implementation of a Noise Management Plan to contain details of best practices, as well as procedures to investigate and address any noise complaints.

APPENDIX A

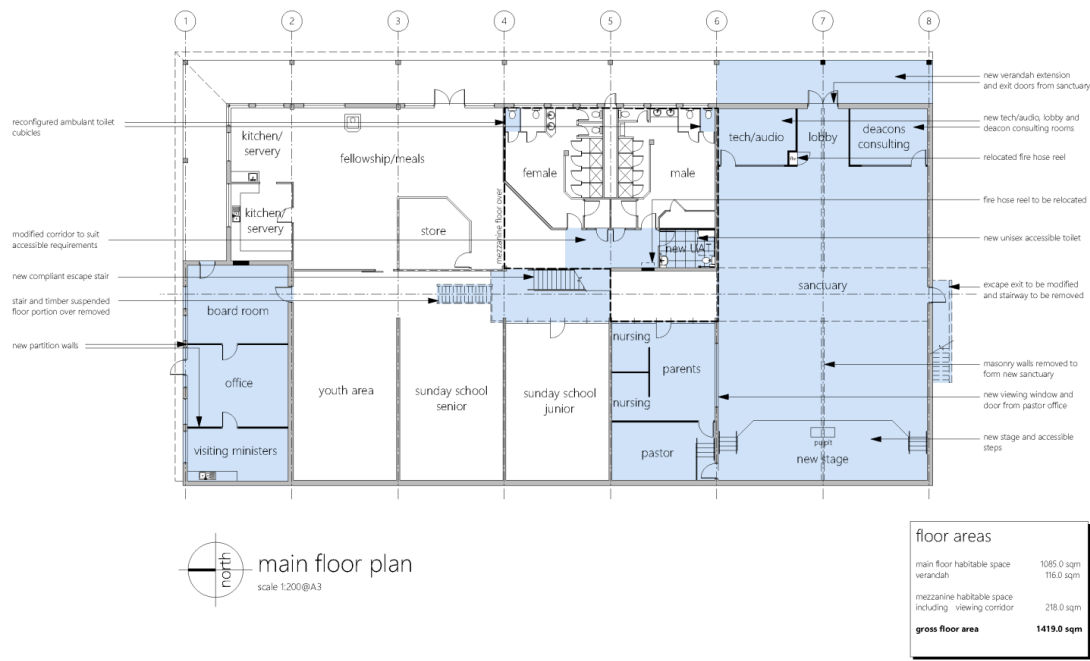
PLANS



Arnold Scheib
DESIGN AND ILLUSTRATION
M 0438 399 748 E amold@asbd.com.au W www.arnoldscheibdesign.com.au A 28 Ellis Road Mt Nasura WA 6112

spoken word fellowship
change of use - place of worship, lot 500 (#8) Wygonda Rd Roleystone WA 6111

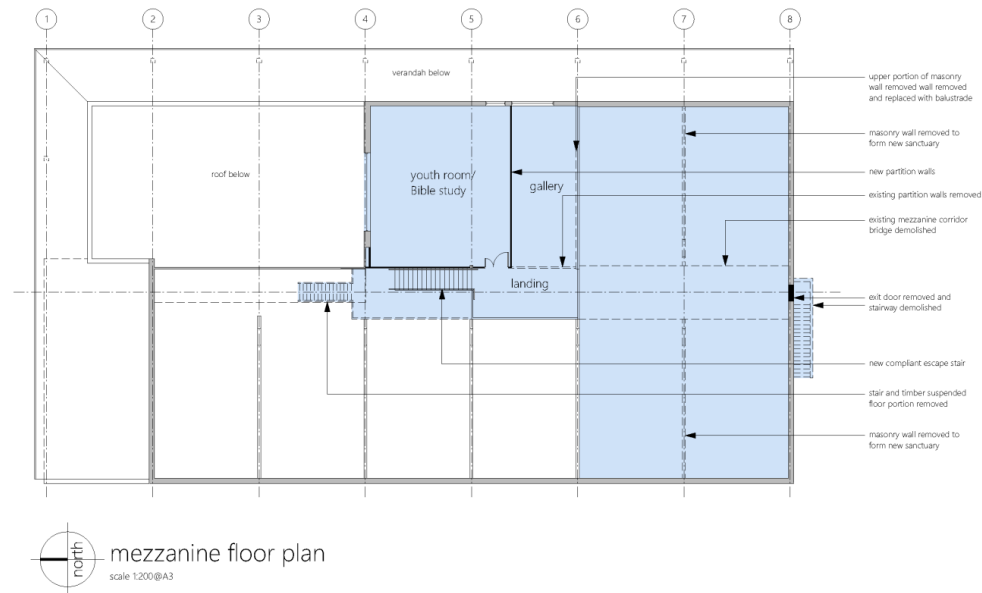
SK1
revision 0



spoken word fellowship
change of use - place of worship, lot 500 (#8) Wygonda Rd Roleystone WA 6111

SK2
revision 0

Arnold **SKBUILDING** DESIGN AND ILLUSTRATION
M 0438 399 748 E amold@abdi.com.au W www.arnoldschibaabuildingdesign.com.au A 28 Ellis Road Mt Nasure WA 6112



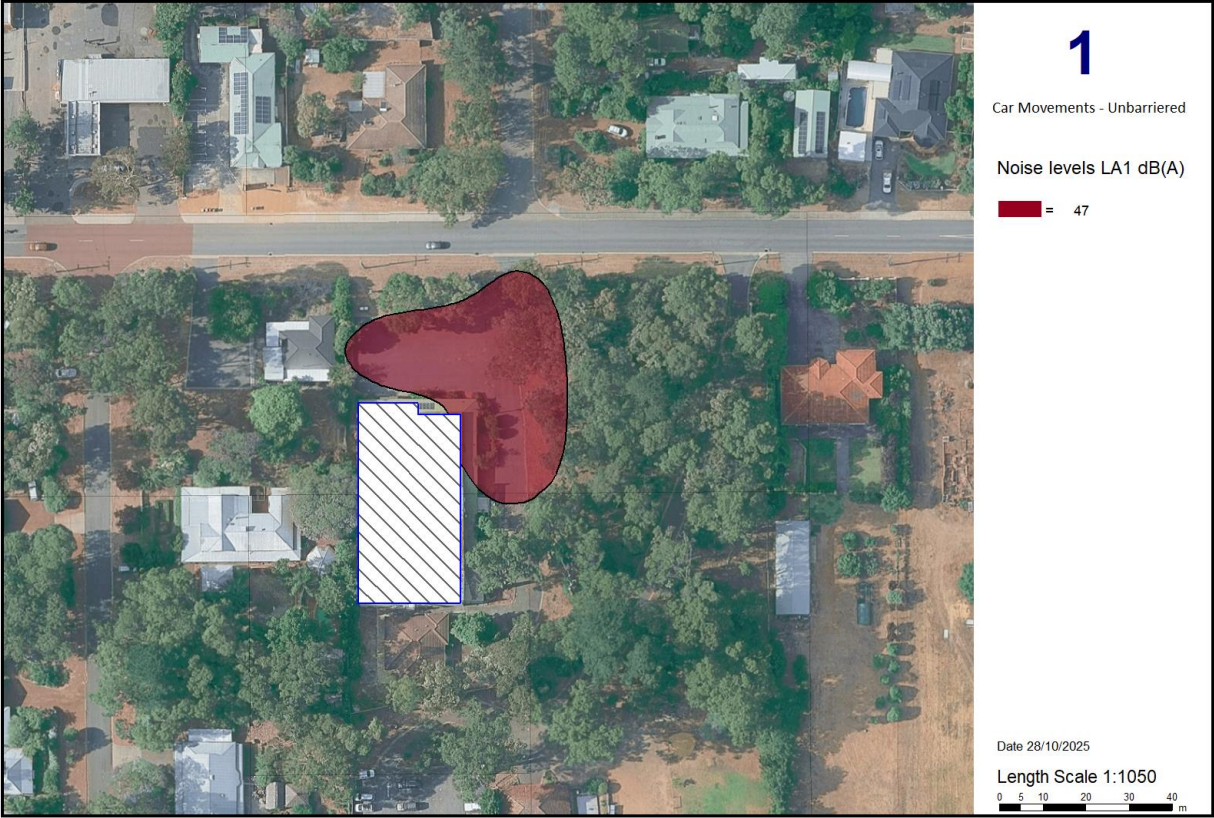
Arnold Schilling DESIGN AND ILLUSTRATION
M 0438 399 748 E amold@asid.com.au W www.arnoldschillingdesign.com.au A 28 Ellis Road Mt Nasura WA 6112

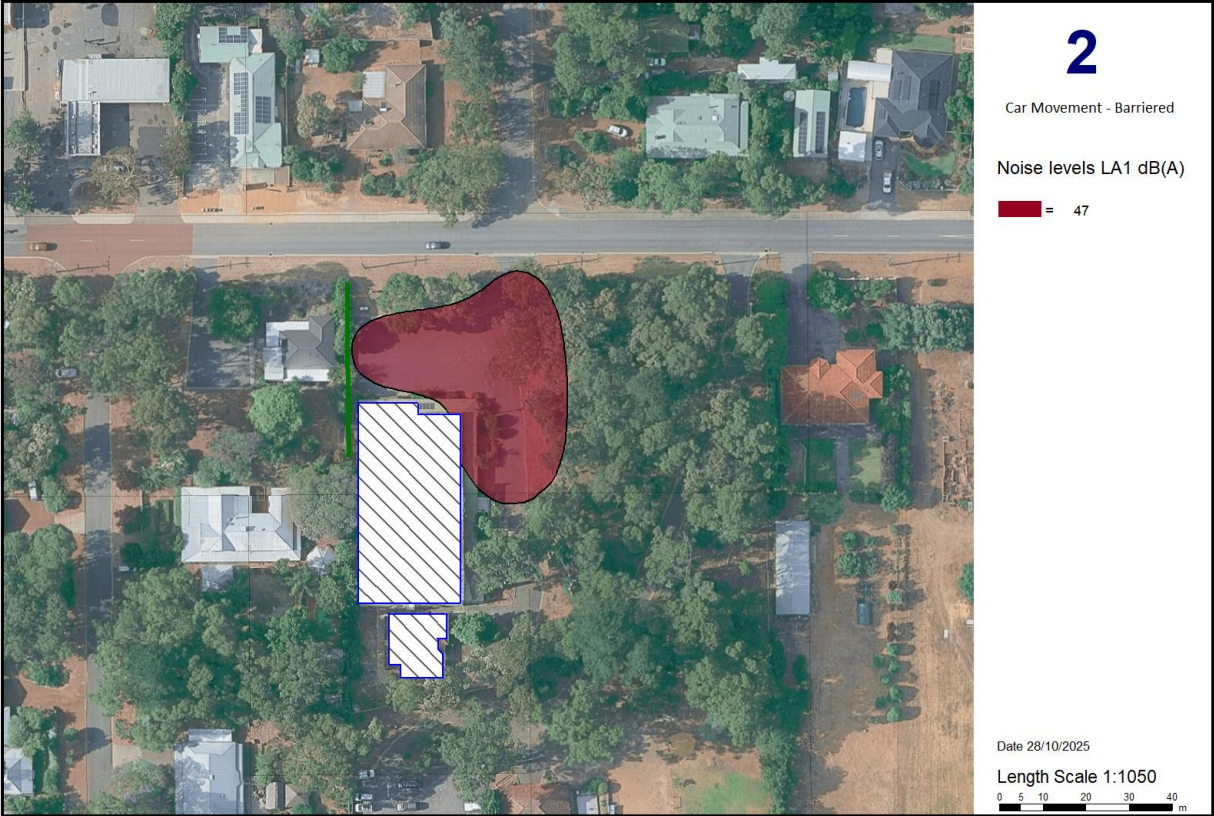
spoken word fellowship
change of use - place of worship, lot 500 (#8) Wygonda Rd Roleystone WA 6111

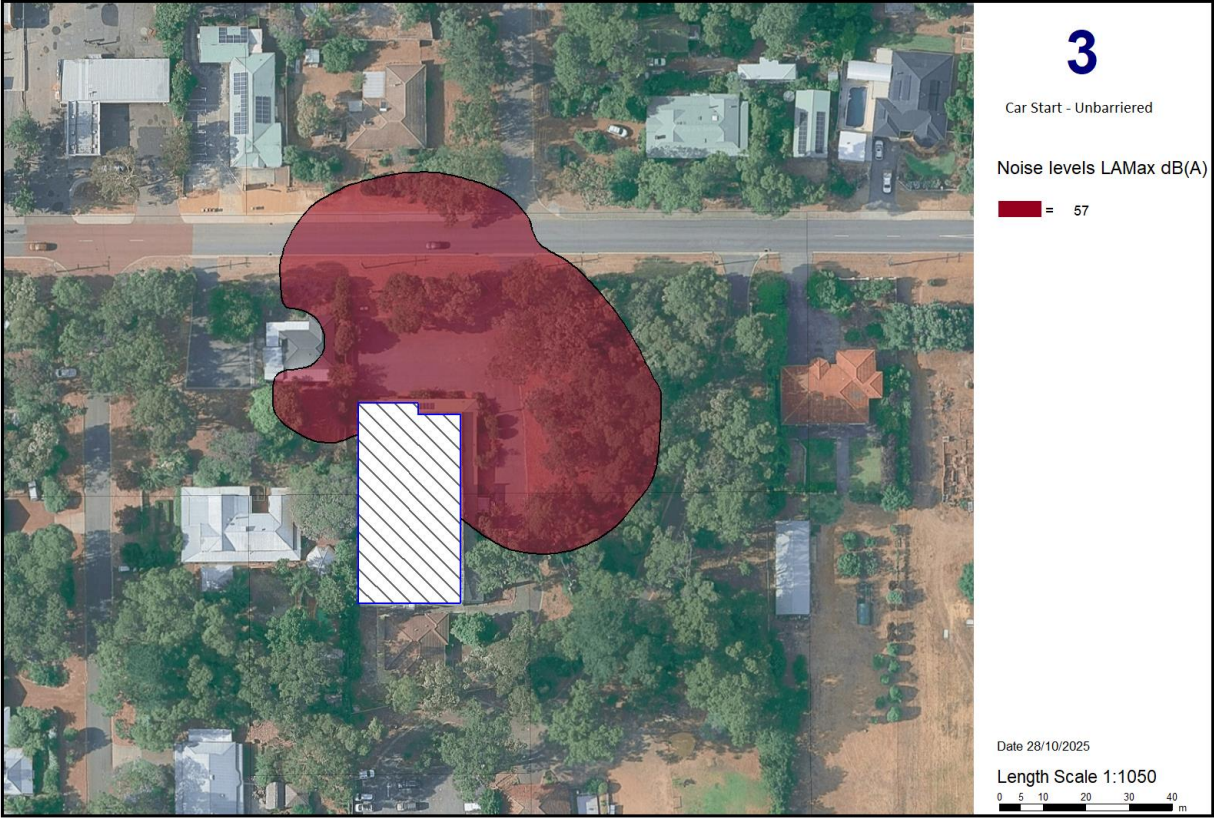
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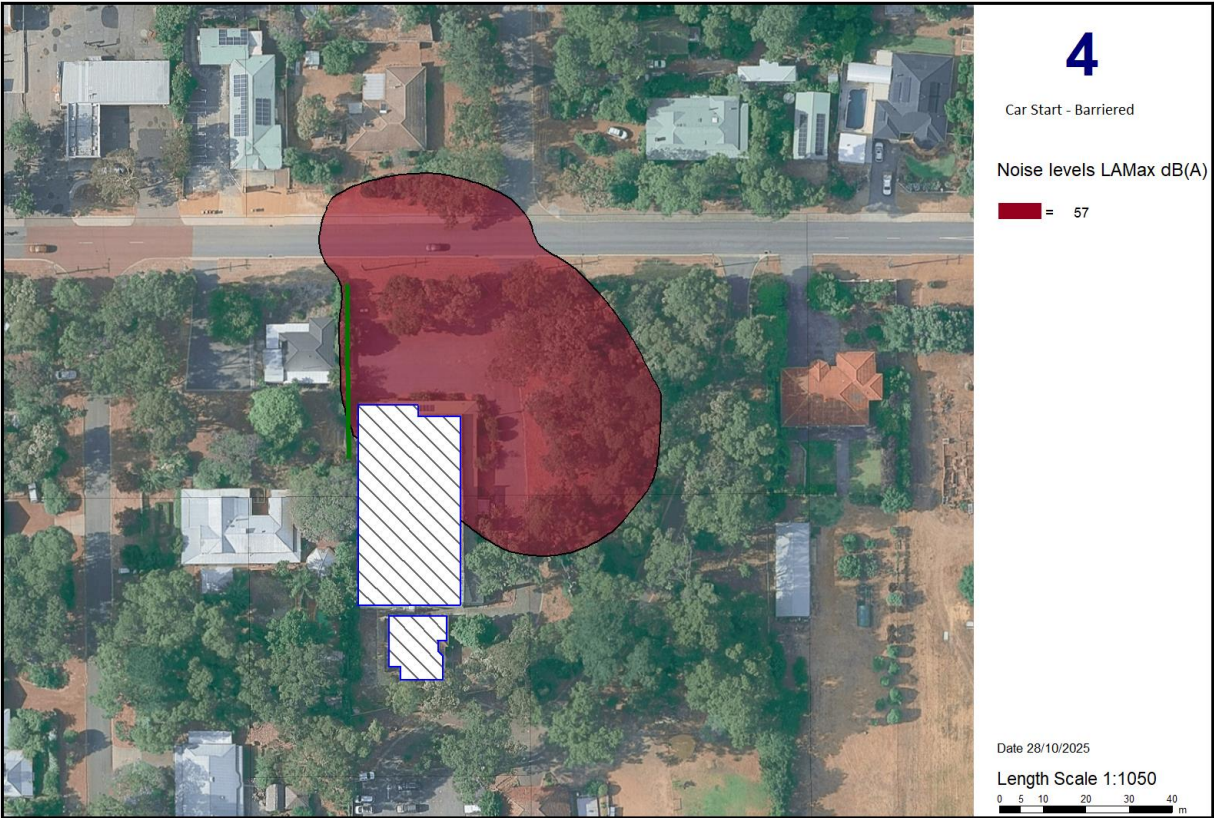
APPENDIX B

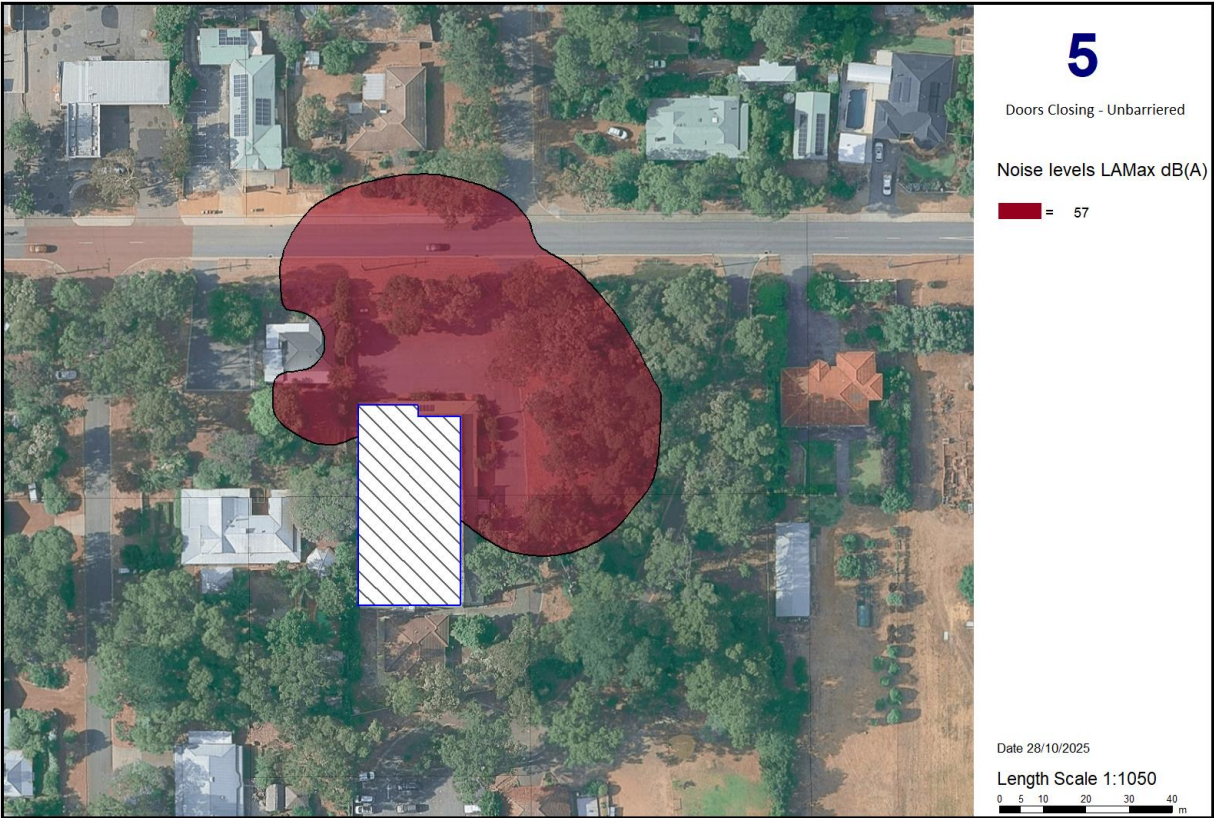
NOISE CONTOURS

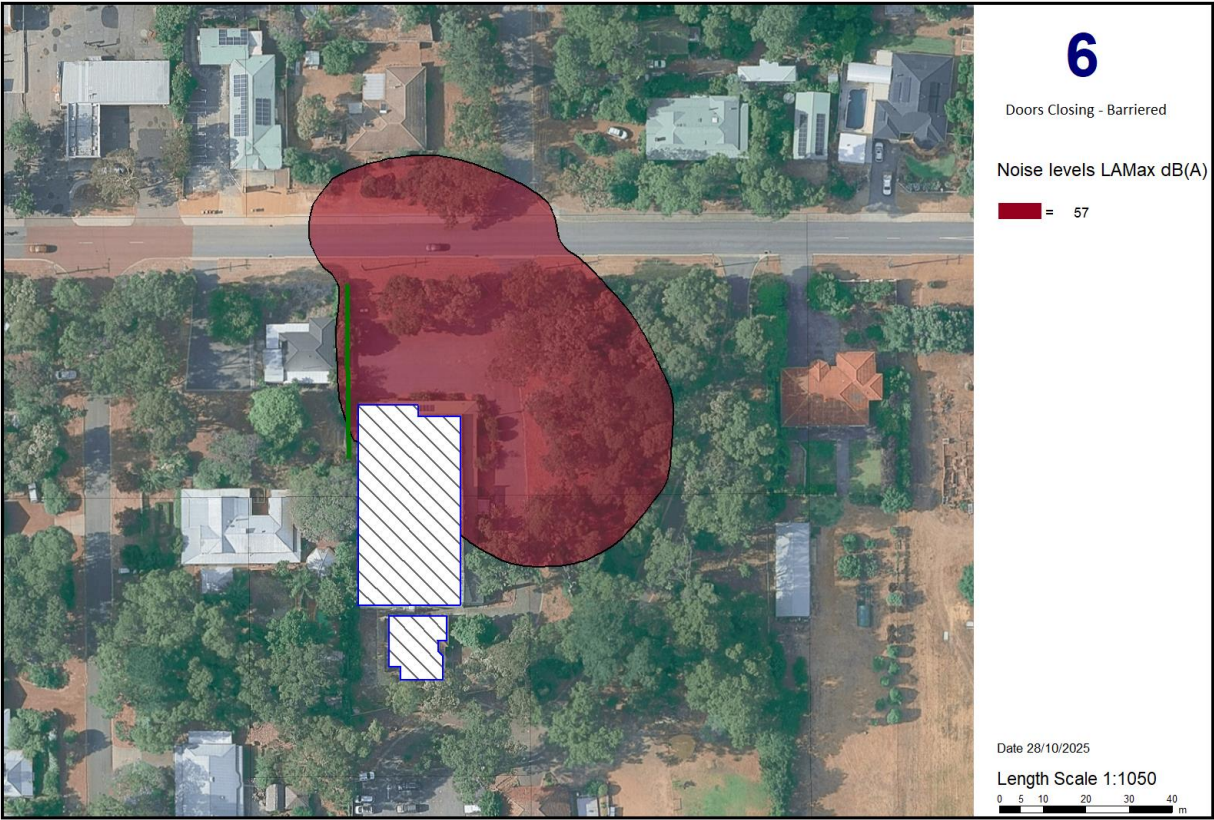














LOCATION PLAN

Lot 41 (No. 61) Nelson Street, Bedfordale



SCALE 1 : 7500



LOCATION PLAN

Lot 41 (No. 61) Nelson Street, Bedforddale



SCALE 1 : 5000

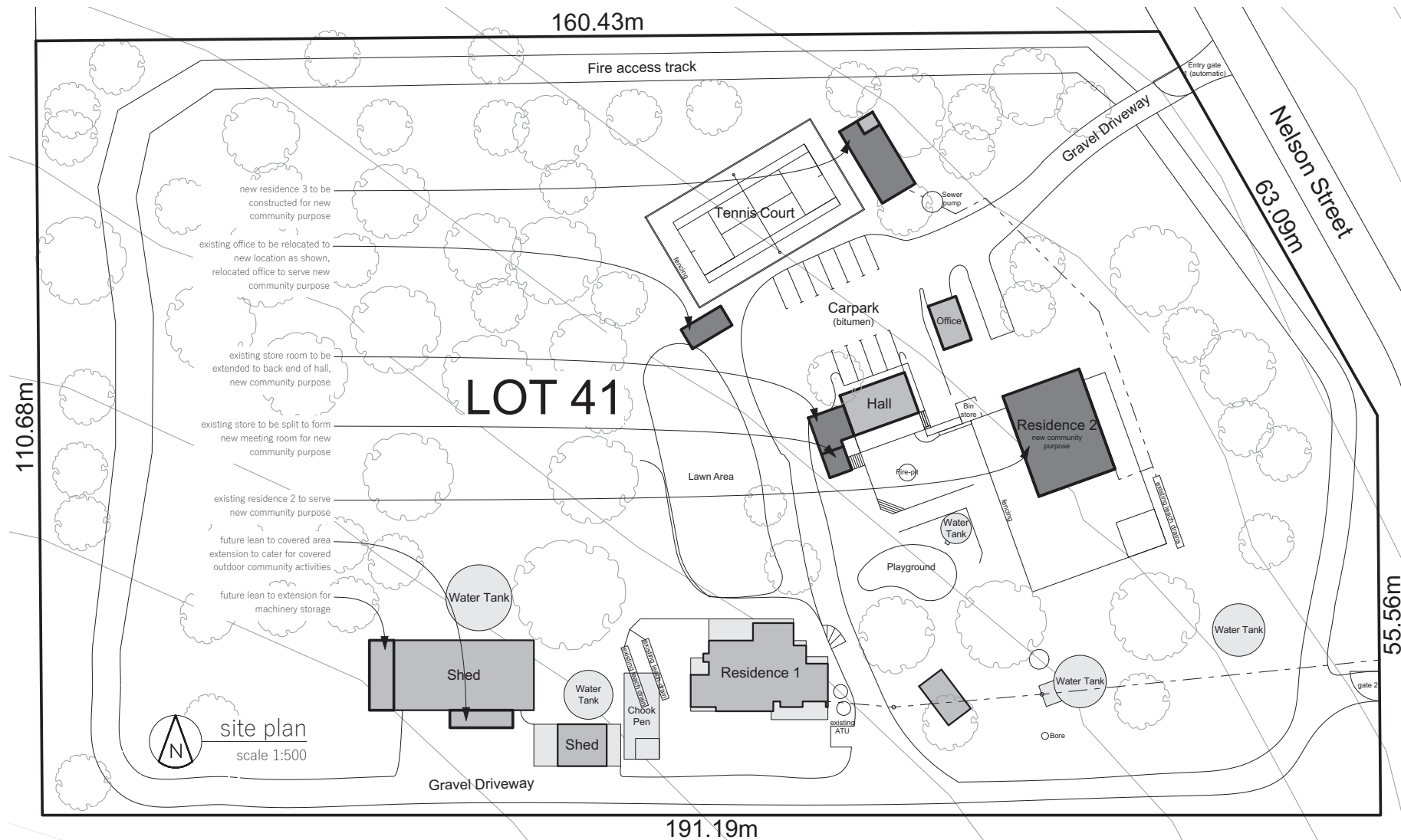
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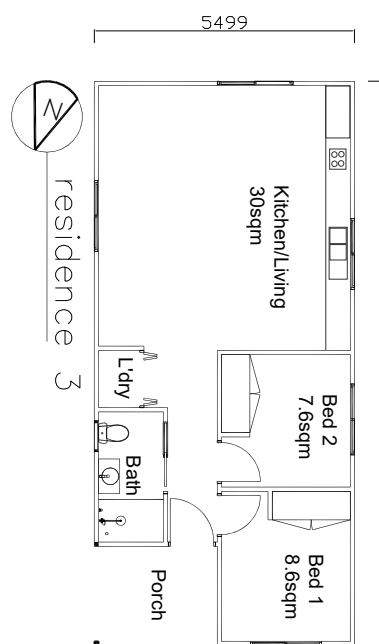
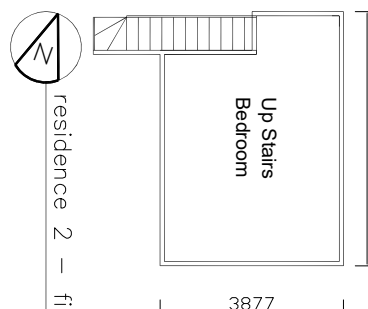


Subject Site

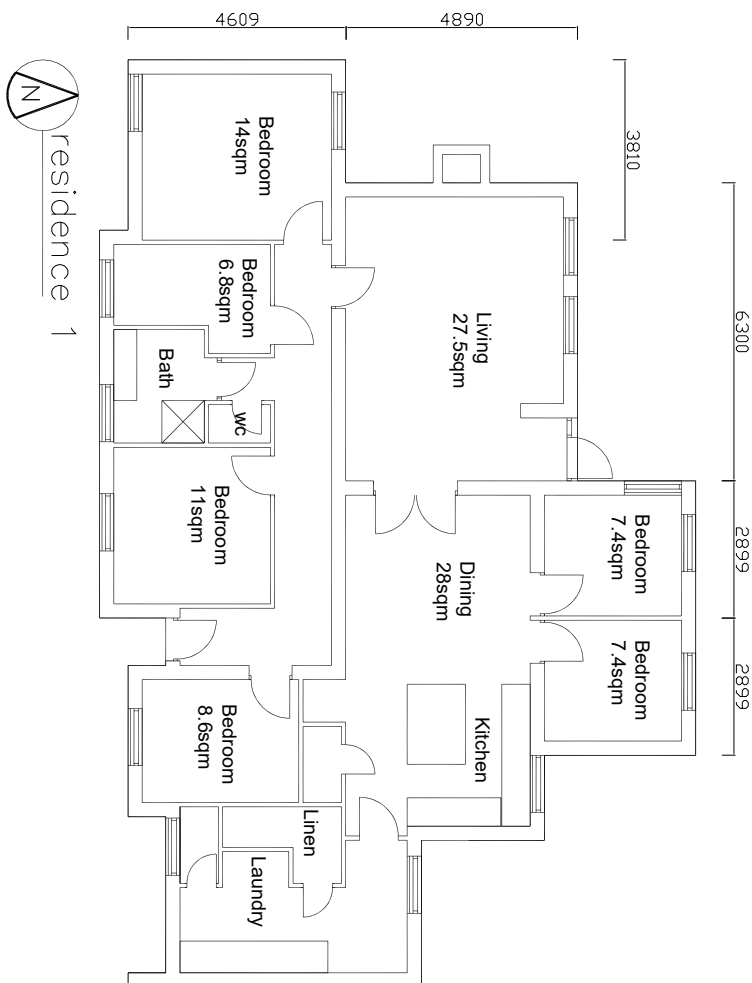
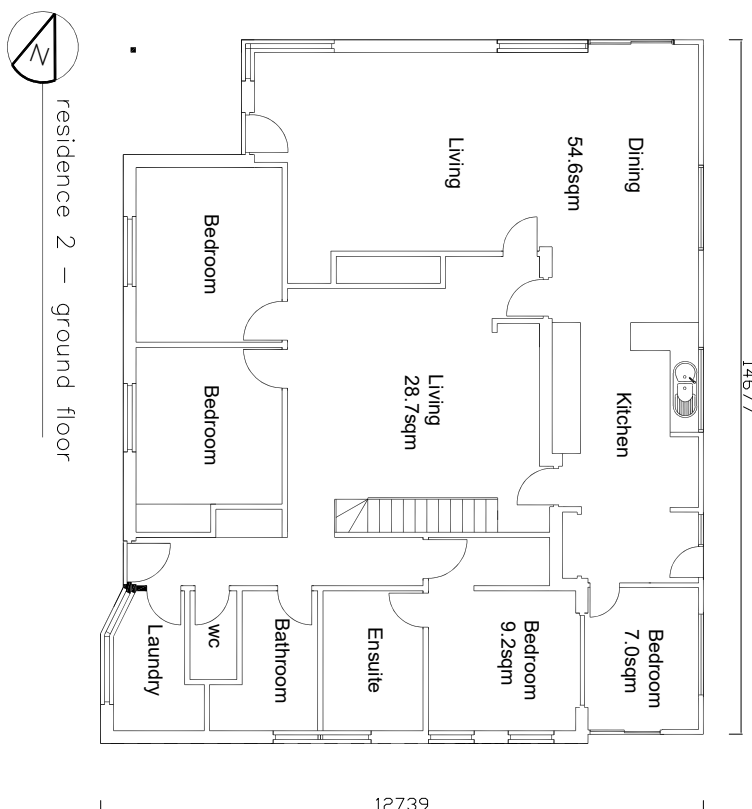
DATE 14 November 2024 - REVISION 2401
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Based on information provided by and with the permission of the
Western Australian Land Information Authority trading as Landgate (2012).
Aerial photograph supplied by Landgate, Photomaps by Nearmap.



residence 3

residence 2 – first floor

residence

residence 2 – ground floor

project:

description:

revision:	amendment notes:

date:

M 0477 868 984

E.tristan.draftinganddesign@gmail.com drawn by

scale:

Pindari As Built Plans
lot 41 (#61) Nelson Street Bedfordale WA 6112

2

RESIDENCE
PLANS

c | site plan changes and amendments according to client request

6/06/2025

TPIS

2502

6/06/2025

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TRISTAN SCHIEBAAN
DRAFTING AND DESIGN

AS BUILT

SK2C

Project: Pindori As Built Plans
lot 41 (#61) Nelson Street Bedfordvale WA 6112

description: RESIDENCE
PLANS

revision: amendment notes:	
A	Issue for DA
B	
C	

date: 10/07/2025

M 0477 868 984

E tristan.schiebaan@gmail.com

drawn by: MEB

project # 2502

date: 10/07/2025

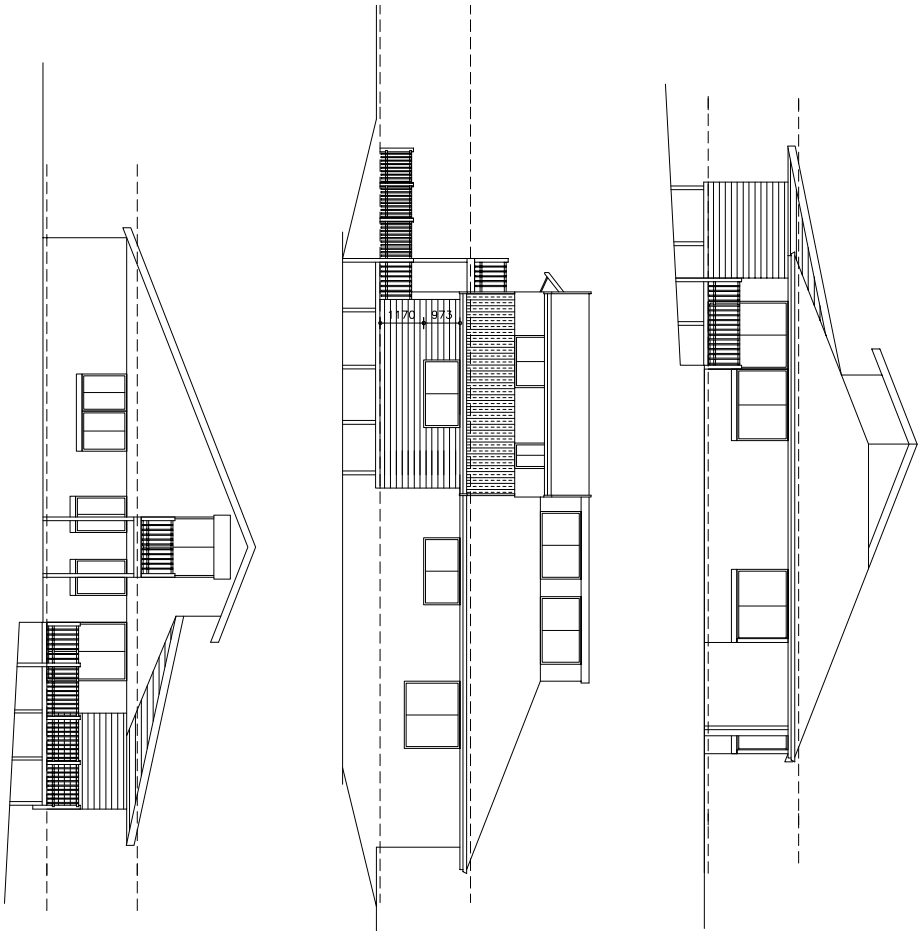
issue: As Built

drawing # SK 3c

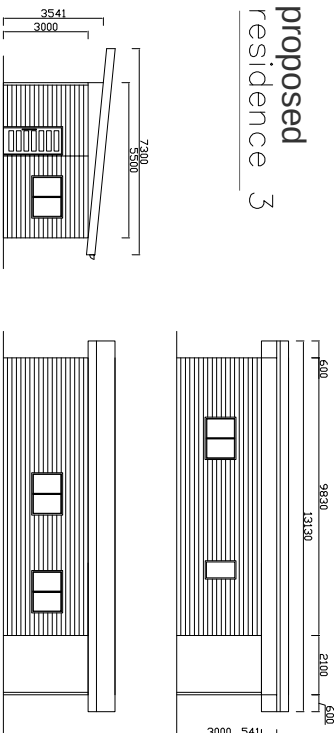
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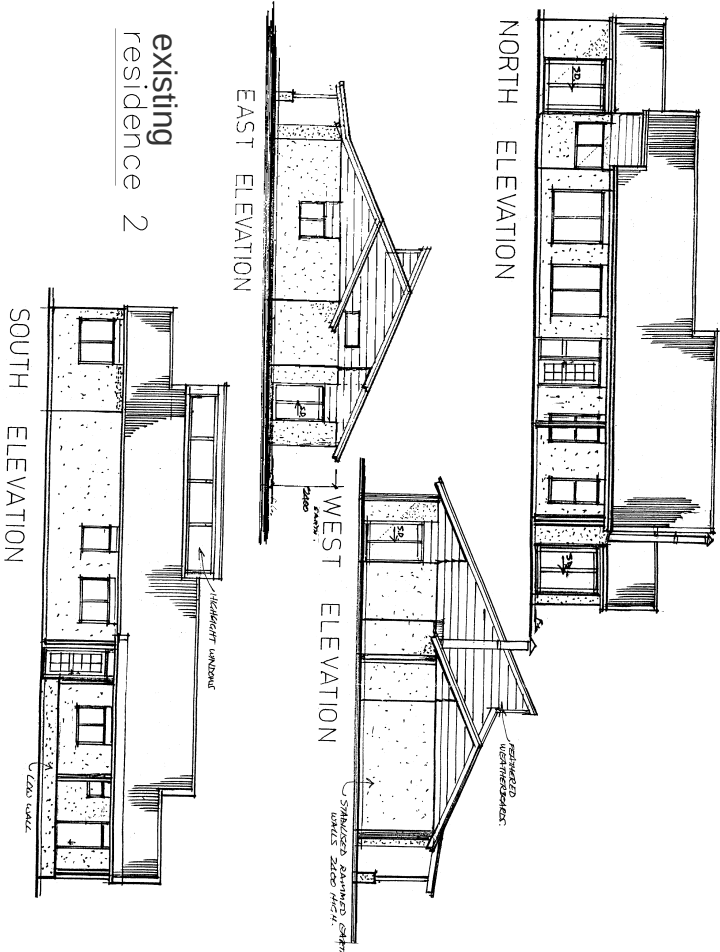
existing
residence 1



proposed
residence 3



existing
residence 2



Development Application – Pindari Restoration House Lot 41 – 61 Nelson Street,
Bedfordale (links to supporting documents currently on City of Armadale Website for
viewing)

1. Covering Letter
[https://engage.armadale.wa.gov.au/102687/widgets/470472/
documents/314627](https://engage.armadale.wa.gov.au/102687/widgets/470472/documents/314627)
2. Pindari House Management Plan (July 2025)
[https://engage.armadale.wa.gov.au/102687/widgets/470472/
documents/314628](https://engage.armadale.wa.gov.au/102687/widgets/470472/documents/314628)
3. Bushfire Management Plan & Bushfire Emergency Plan (July 2025)
[https://engage.armadale.wa.gov.au/102687/widgets/470472/
documents/314629](https://engage.armadale.wa.gov.au/102687/widgets/470472/documents/314629)

SCHEDULE OF SUBMISSIONS DEVELOPMENT APPLICATION – AMEND DA 10.2015.166.1- COMMUNITY PURPOSE (PINDARI RESTORATION HOUSE) LOT 41 D/P163497, No. 61 NELSON STREET, BEDFORDALE				
NO.	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	RECOMMENDATION
1	Landowner CE/112298/25	SUPPORT	1.1 No comments provided	1.1 Noted
2	Landowner CD/43565/25	OBJECT	2.1 Most residents in Nelson St were against this when approval was pushed through by the Council. It has not been a problem with six residents but we do object again to increased numbers to fifteen and further building. 2.2 A lot of young families have moved into Nelson Street with small children and there could be some risk. 2.3 We as residents are not allowed more expansion on our blocks	2.1 Noted - the quiet and responsible operation of the development since its approval is noted. 2.2 Not supported - it is not clear from the submission what kind of risk is posed to young families. The City notes that there have been no formal complaints received by the City in relation to the current development and the regular audit reports from the applicants indicate there have been no breaches of the approved management plan to date. 2.3 Partly supported - the applicant is seeking to expand an approved use and has provided revised documentation in support of the current proposal. The current proposal (now a non-conforming use) will be assessed for compatibility with the objectives of the current zoning (Special Rural). Note that surrounding landowners are able to apply for approval of permissible land uses on their land in accordance with the City's Town Planning Scheme No.4.
3	Government Agency CE/127140/25	COMMENT ONLY	3.1 DPLH has no comment to make in respect of the proposal.	3.1 Noted
4	Landowner CE/127382/25	OBJECT	4.1 My objection is based on the additional traffic this will bring to a quiet street. As it stands there are currently at least 8 cars a day come and go from the property. There has been multiple near misses	4.1 Not supported - The applicant has advised that staff numbers remain modest and staggered, ensuring traffic generation is low and manageable. Additionally, car parking is provided on the site to prevent parking on the roadside. The applicant has also noted that the incident referred to above occurred due to driver error and is not related to the volume of traffic originating from the facility or the volume of traffic on Nelson Street. No other incidents, including near misses, have been recorded and staff at the facility have not been made aware of any.

SCHEDULE OF SUBMISSIONS				
DEVELOPMENT APPLICATION – AMEND DA 10.2015.166.1- COMMUNITY PURPOSE (PINDARI RESTORATION HOUSE) LOT 41 D/P163497, No. 61 NELSON STREET, BEDFORDALE				
NO.	SUBMITTER	SUPPORT, OBJECT, COMMENT	SUMMARY OF SUBMISSION	RECOMMENDATION
			and 1 accident from the traffic coming and going from the property to date in the 3 years I've lived here.	Given that residents are not permitted to have their own vehicles, increased traffic to and from the site can be attributed to staff and visitors. The City’s Technical Services has raised no objections to the current crossover arrangements. It is considered that the current road network has sufficient capacity to accommodate the additional vehicles visiting the site.