Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
Government A	Agenci	ies		
IN25/2042 ATCO Kim Hatcher, 81 Prinsep Road, Jandakot, WA 6164	1.	<ul> <li>ATCO Gas Australia (ATCO) has no objection to the proposed application, based on the information and plan provided, subject to the following advice notes:</li> <li>Advice notes:</li> <li>The proposed areas fall within the WAPC Draft Development Control 4.3 Trigger Distance for ATCO Infrastructure. Any sensitive land use or high density community use developments within this Trigger Distance of a High Pressure Gas Pipeline requires further consultation with ATCO prior to preliminary designs being finalised. Please consider the WAPC's draft DC4.3 and also the site; PlanWA for development planning.</li> <li>ATCO identifies that the proposed future development may require additional safety measures to be considered, identified and in place for the high pressure gas pipeline risk mitigation.</li> <li>Anyone proposing to carry out construction or excavation works within 15 metres of Critical Asset Infrastructure must contact 'Before You Dig Australia' (www.byda.com.au) to determine the location of buried gas infrastructure. Refer to ATCO document</li> </ul>		No modifications recommended.

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		<ul> <li>All works occurring within 15 metres of Critical Asset Infrastructure must undergo ATCO Engineering Assessment to determine if additional safety measures are required. Risk mitigation and asset protection measures may be necessary. Notification for the works must be submitted to ATCO via the online web portal.</li> </ul>		
		<ul> <li>All works occurring within 15 metres of Critical Asset         Infrastructure must comply with the ATCO document Additional         Information for Working Around Gas Infrastructure - AGA-O&amp;M-PR24 https://www.atco.com/en-au/for-home/natural-gas/wa-gas-network/working-around-gas.html     </li> </ul>		
		<ul> <li>Future construction and any proposed access roads across the ATCO Critical Asset gas mains (including proposed roads and road upgrades) need to be managed in accordance with the ATCO document Additional Information for Working Around Gas Infrastructure - AGA-O&amp;M-PR24 https://www.atco.com/en- au/for-home/natural-gas/wa-gas-network/working-around- gas.html</li> </ul>		
		<ul> <li>Anyone proposing to carry out construction or excavation works must contact 'Before You Dig Australia' (www.byda.com.au) to determine the location of buried gas infrastructure. Refer to ATCO document AGA-O&amp;M-PR24- Additional Information for Working Around Gas Infrastructure https://www.atco.com/en- au/for-home/natural-gas/wa-gas-network/working-around- gas.html</li> </ul>		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		<ul> <li>If the disconnection and/or removal of an ATCO gas service is required, a request can be submitted via the online ATCO portal found here.</li> </ul>		
		Please accept this email as ATCO's written response.		
IN25/2223	2.	'		No modifications
Water Corporatio n		Water Corporation should be notified and the process for working near our assets should be initiated. This involves applying for an Asset Protection Risk Assessment.		recommended.
Matt		See our website for more information:		
Calabro, 629		https://www.watercorporation.com.au/Developing-and- building/Working-near-assets		
Newcastle St, Leederville, WA 6007.		The information provided above is subject to review and may change. If the proposal has not proceeded within the next 6 months, please contact us to confirm that this information is still valid.		
IN25/3081	3.	The department notes that we do not have formal processes for		No modifications
Dept of Climate		commenting on amendments to local planning schemes, however we can provide the following general guidance:		recommended.
Change, Energy, the		<ul> <li>The department encourages the Shire of Serpentine Jarrahdale (the Shire) to consider potential impacts to Matters of National</li> </ul>		

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				Recommendation
Environme nt and		Environmental Significance (MNES) resulting from any action taken by the Shire of Serpentine Jarrahdale.		
Water Milly Filmer,		The department broadly defines an action as, a project, a development, an undertaking, an activity a series of activities, or an alteration of any of these things.		
Exchange Tower, 22/2 The Esplanade, Perth, WA		The department encourages the Shire to avoid impacts to native vegetation and MNES when amending the local planning scheme.  MNES likely to occur within a planning area can be identified using the department's Protected Matters Search Tool.		
6000		Before considering an action, the department recommends conducting a self-assessment to determine impacts to MNES and to decide on whether to refer for assessment under the EPBC Act.		
		The EPBC Act Self-Assessment Guidelines provide guidance on conducting self-assessments in relation to several MNES. If in doubt, or when considering future planning to avoid MNES, the department offers pre-referral meetings that can provide valuable guidance.		
E25/1676 DMIRS	4.	The Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) has determined that this proposal is primarily administrative, and that the changes to the amendment will not		No modifications recommended.
Steven Batty,		introduce any significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.		
Mineral House, 100		DEMIRS lodges no objections to the above Local Planning Scheme		

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
Plain St, East Perth, WA 6004	5.	Amendment  The Dall has no chiestian to the proposed amendment		No modifications
Dept of Health	5.	The DoH has no objection to the proposed amendment.		recommended.
Michael Lindsay, 189 royal St East Perth, WA 6004				
Dept of Transport Shanthi Golestani, GPO Box C102, Perth WA 6839	6.	The Urban Mobility (UM) division of DoT has reviewed the submitted documents and advises that DoT has no objection to the proposal.  DoT has not liaised with Main Roads WA or the Public Transport Authority on this referral, and recommends direct comment is sought by the Shire.		No modifications recommended.
IN25/3628 DPIRD	7.	The Department of Primary Industries and Regional Development (DPIRD) has reviewed the proposed amendment and has no comments to provide at this time.		No modifications recommended.

. The proposed scheme amendment has been considered for its potential impact on heritage-protected places within the scheme	No modif recomme	
<ul> <li>As the proposed scheme amendment is unlikely to impact on heritage-protected places, there is no objection from a historic heritage perspective.</li> </ul>		ended.
We hope that these comments are of value in the development of the proposed scheme amendment.		
In response to your correspondence received on 23 January 2025, please be advised that Main Roads has no further comments to the proposal to amend infrastructure contributions area and inclusions.	No modif recomme	
	please be advised that Main Roads has no further comments to the	please be advised that Main Roads has no further comments to the recomme

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Centre, Waterloo Crescent, East Perth, WA 6004				
IN25/5840  Rowe Group on behalf of Parcel Property Chris Green, Level 3 369 Newcastle Street, Northbridg e, WA 6003.	10	Rowe Group acts on behalf of Parcel Property, as landowners and project managers of various lots within Precincts E1 and E2 of the Mundijong District Structure Plan, which are subject to DCA 3 and DCA 4 contributions as per the requirements of the Shire's Local Planning Scheme No.3. We are instructed by our Client to provide you with a submission in relation to the proposed Scheme Amendment and Development Contribution Plan Report (CIDCP) Annual Reports.  Scheme Amendment – Amendments to Schedule 7.3  1. Taylor Road / Adams Street (Integrator B upgrade) between Bishop Road and Mundijong Road  Taylor Road / Adams Street is the primary access road serving the western half of the Mundijong District Structure Plan (DSP) area, and the only north-south, 'District Distributor' (Integrator B) Road west of the Mundijong Centre. As such, access to development Precincts E, F and G is entirely dependent upon Taylor Road / Adams Street,	Removal of the specific road intersection treatments is supported in the Schedule of Modifications and is instead detailed in the DCP Report. This is consistent with other road items and thus enables flexibility as planning develops.	Schedule of Modifications #5.

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		and therefore we fully support the inclusion of the road within the DSP.		
		However, given the critical importance of this road to the broader Mundijong DSP area, we are concerned that not all the necessary land and infrastructure required for the upgrade of this road are included within the DCP. The Mundijong-Whitby Traditional Infrastructure Development Contribution Plan Report notes the costing includes "traffic control devices including one set of traffic lights and one roundabout", with the roundabout identified at the intersection of Taylor Road and Kiernan Street. The report notes that whilst land required for the Mundijong Road intersection is included, traffic control devices / or a roundabout at this intersection do not appear to be costed and identified. Through our engagement with Main Roads WA regarding the Mundijong (Precincts E1 & E2) Local Structure Plan, MRWA have identified the requirement for a roundabout at this intersection, which should be included in the DCP's infrastructure costing.		
		Similarly, the Scheme Amendment defines the 'land required' as being that land 'in excess of a standard 20m reserve, to achieve a 30m wide road reserve'. However, the current Adams Street road reserve does not extend south of Cockram Street, requiring a new road reserve to be established / extended in order to connect through to Mundijong Road. The Mundijong Precinct E1 Local Structure Plan provides for this by accommodating the future road extension (which measures approximately 366 metres in length) entirely within the existing boundaries of Lot 54. Whilst the DCP	The request to include compensation for the full width of new road reserves is inconsistent with the established principles and precedents of this, and other, DCPs administered by the Shire.  Under the current approach, in accordance with Liveable Neighbourhoods, the first 20 metres of a road reserve is considered standard and is not subject to compensation. The item scope clearly details this.	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		provides compensation to all other landowners adjacent to Taylor Road / Adams Street affected by the expansion of the existing reserve, it is not clear if the DCP includes provision for the full extent of land required to accommodate the Adams Street extension to Mundijong Road (30 metres wide, plus land required for the roundabout and drainage). For consistency, the DCP should clarify and fully compensate the owner of Lot 54 for the land required to accommodate the Adams Street extension, as is the case for all other landholders affected by the widening and upgrade of Taylor Road / Adams Street.	This principle has been consistently applied across the DCP area, where a number of new roads have already been delivered—such as Tinspar Avenue, Goodwood Boulevard, and Skyline Boulevard—under this arrangement.  Altering this approach now to include full reserve compensation for new roads would result in a significant increase in DCP costs. To maintain equity, any change may necessitate retrospective reimbursement to landowners who have already ceded land under the current framework. This would shift the financial burden onto future developers, creating a situation where contributors are not treated equitably, and inflating the cost per lot in a manner that undermines affordability and fairness.  Given the precedent, financial implications, and equity considerations, it is not considered appropriate to revise the approach at this stage of the DCP.	
		The CIDCP report notes the DCP funding includes the "complete road construction to a Liveable Neighbourhoods Integrator B standard" whilst also identifying 'earthworks for the whole road reserve' and 'associated drainage, including water sensitive urban design measures' as individual line items. As such, it is unclear if streetscaping costs, such as landscaping, tree planting, and irrigation etc are included in the DCP. Given the district level function these	Streetscaping elements such as trees, landscaping and decorative verge treatments are specifically excluded from the DCP scope, as their inclusion cannot be directly linked to demand from new population growth. While <i>Liveable Neighbourhoods</i> includes street trees in standard road designs, the DCP funds only the base road infrastructure necessary for traffic	Schedule of Modifications #5

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		roads provide, these costs should be met by the DCP and not only adjoining landowners. Furthermore, providing for the provision of landscaping costs within the DCP is important to ensuring the streetscapes of the six district roads are consistent with one another and supporting the delivery of the Shire's tree canopy goals, set out by the Shire's 'Urban and Rural Forest Strategy 2018-2028'.	function, drainage and access. Additional streetscape treatments remain the responsibility of adjoining landowners or are delivered through separate Shire programs in line with broader canopy goals. This approach ensures cost contributions remain focused on essential infrastructure with a clear need and nexus under SPP 3.6.	
			Whilst the DCP report does identify that streetscaping is excluded, it is accepted that the line item is misleading. Revised wording for the line item is proposed in the schedule of modifications.	
		We are concerned the DCP's 'road drainage' costs are significantly higher (40% increase) than the current market rates. We therefore recommend these costs be investigated further and be reviewed by a Quantity Surveyor to ensure the costings are accurate.  Recommendations  The DCP confirms its costings include the extension of Taylor Road / Adams Street through to Mundijong Road.  The DCP includes streetscaping costs (landscaping, tree	Officers intends to have all remaining infrastructure independently re-costed once gazettal of the Amendment occurs, for inclusion in the associated DCP Report Revision. These costs will be available for comment by MIRG and BIRG prior to the Report being adopted. Likewise, updates to the report provisions will occur based on the latest LSP updates available at that time (including the new intersections noted).	DCP Report level comment – n/a
		<ul> <li>planting, irrigation, etc) for the district level roads.</li> <li>Road drainage costs be further investigated and are subject to review by a Quantity Surveyor.</li> </ul>		

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				Recommendation
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		2. Adams St / Cockram St Primary School Neighbourhood Open Space		-
		The Mundijong District Structure Plan provides good accessibility to open space, identifying a total of ten (10) areas of 'Neighbourhood Open Space'. However, the distribution of this community infrastructure together with landownership patterns means the provision of these areas is not equitable between all landowners. Therefore it is entirely appropriate that the DCP provides for the land required for neighbourhood open space and the provision of infrastructure within it.		
		Recommendation		
		We support the inclusion of the Adams St / Cockram St     Primary School Neighbourhood Open Space within the DCP.		
		Mundijong-Whitby Traditional Infrastructure Development Contribution Plan Report	Advice received that 1,100 lots would be created to 2038, which is 58% build out. Recent draft LSP	DCP Report level comment – n/a
		3. Appendix I: Land for Public Open Space & Drainage –	indicates total POS is 187,978m2. 58% of that POS total is 109,027m2. Adjusting for CIDCP: if 1,100 lots	
		It is unclear how the area of land for Public Open Space and Drainage within Mundijong Precincts (E1 and E2), which totals 88,468m², has been calculated. This compares to the draft Local Structure Plan currently being considered by DPLH, which provides a total of 190,578m² of drainage and public open space.	to 2038 and average lots per annum of 75, lot forecast to 2036 = 1,100 less 150 = 950 lots for CIDCP at 2036.  Updated in readiness for the next Report Revision.	

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				Recommendation
		Recommendation: That the area of drainage for Precincts E1 and E2 be revised to 190,578m², consistent with the current Local Structure Plan.		
		Cost Apportionment Schedule Consistency with SPP3.6 and 'Shire Internal Costs'  We are concerned the Cost Apportionment Schedule is inconsistent with the SPP3.6 Infrastructure Contribution Guidelines (template Appendix B) and does not include details regarding infrastructure 'trigger point / delivery date', 'grants / other contribution' amounts' and or council contributions (from the existing community). Whilst this detail is important and ensures the DCP is consistent with SPP3.6, the trigger / delivery date is particularly important for Taylor Road / Adams Street as there is currently no connection through to Mundijong Road. As such, the completion of this road should be a priority for the DCP, ahead of the upgrade of roads elsewhere within the contribution area.	The CAS details all the items noted aside from the delivery dates. Delivery dates are detailed in Appendix C – Capital Expenditure Plan. This avoids unnecessary repetition of information and maintains readability of the CAS.	DCP Report level comment – n/a
		Whilst we acknowledge that no costs are allocated against this item, we are concerned the CIDCP includes 'Shire Internal Costs @18%' as a line item for each road. It is unclear if and when this cost will be applied, how this cost has been calculated, and what this includes. Contrary to SPP3.6, no supporting evidence is provided to justify this potential cost which appears may be applied as a standard / percentage cost against the total cost of infrastructure. The inclusion and potential application of this as a standard cost for each item, irrespective of the tasks and scope of work that may need to be	The Shire recognises that project management costs are an essential component of infrastructure delivery, particularly where delivery is undertaken directly by the Shire rather than via developer pre-funding. Historically, a line item titled "Costs associated with Design and Management" has been included in DCP projects to capture this. However, the costing for this line has not previously incorporated internal Shire costs incurred during Shire-led delivery. Moving	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		undertaken is contrary SPP3.6 and the 'needs and nexus' principle that it establishes. As no costs are allocated or justification provided, the line item 'Shire Internal Costs @18%' should be removed from the CIDCP.  Recommendation  The Cost Apportionment Schedule be updated and made consistent with the template set out by the SPP3.6 Infrastructure Contribution Guidelines.  'Shire Internal Costs @18%' be removed as a line item from the DCP.  The matters raised above are fundamental to ensuring the successful implementation of the DCP and therefore trust our recommendations are given due consideration.	forward, the term "Shire Internal Costs" has been added for transparency and included in the cost estimates where applicable.  These costs, based on recent modelling for non-DCP projects, are estimated to average around 15% (revised from earlier advice of 18%) of the total project cost. This is not intended as an industry benchmark, but rather a reasonable forecast based on observed historical data for similar infrastructure projects managed by the Shire. It is acknowledged that developers delivering infrastructure directly are not subject to the same governance framework and typically use preferred suppliers without formal tendering, which results in lower overheads. The increase above typical developer project management costs (commonly 7–10%) reflects:  Mandatory compliance with the Local Government Act, including public tender processes for both design and construction.  Officer time spent on procurement governance, tender evaluation, and contract management, often supplemented by consultants for high value tenders.  Additional oversight and reporting processes inherent in public sector delivery.	

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			<ul> <li>Importantly, these internal costs:</li> <li>Do not duplicate general DCP administration costs whereby a proportion of overhead cost for key employees reflects the anticipated time to be spent on the general running of the DCPs.         Additionally, staff involved in specific DCP projects will record that time via project-based timesheets to separate project work from the general administration pool, thus avoiding double counting.</li> <li>Will be reconciled to actuals at the time of delivery. The 18% represents a planning estimate only and will be superseded by actual internal costs when available.</li> </ul>	
			While most traditional DCP infrastructure is developer-delivered, this scope item is included across all projects as it is not always possible to identify in advance which projects (or portions thereof) may be Shire-delivered. The application of this cost to individual infrastructure items will be assessed at each Annual Report Review to reflect the best available information at that time, and only applied to the section/value of the project the Shire is delivering. This allows for consistent treatment and ensures cost recovery is available if required, without impacting developer-delivered projects.	

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			<ul> <li>This approach is considered appropriate for inclusion within the DCPs under the following principles:</li> <li>Transparency: We have included this as a distinct cost category, which will be supported by time-based cost tracking to meet the principles of accountability and equity.</li> <li>Actuals reconciliation: Using actual costs rather than fixed estimates aligns with the requirement for costs to be reasonable and reflective of the actual cost of infrastructure.</li> <li>The anticipated 15% on-cost is provided as a guideline only and the actual percentage applied within the cost schedules will be confirmed at each DCP Report revision, where those costs will be subject to review by MIRG and BIRG. The Amendment requests only the inclusion of the line item as an applicable cost.</li> </ul>	
Taylor Burrell Barnett On behalf of	11	Thank you for the opportunity to lodge a submission on the Shire of Serpentine Jarrahdale Scheme Amendment No. 7. This submission has been prepared on behalf of Gold Fusion Pty Ltd and Sedayu Taylor Pty Ltd (Golden Group), responsible for the development of land within the Whitby Estate and Lots 3, 5 & 9000 of the Mundijong Sub-Precinct G1 Structure Plan area.  Firstly, we acknowledge our support for the reduction to the cost and scope of individual community infrastructure items and focus on		-

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Golden Group		alternative funding arrangements such as grant funding, and we commend the Shire for its vision and foresight in this regard.		
Katherine Shirley, Level 7/160 St Georges Terrace, Perth WA 6000		The main purpose of this submission is to request the Shire amend existing infrastructure item, Skyline Boulevard, within Development Contribution Area 3 (DCA3)(the Mundijong-Whitby Urban Traditional DCP) to increase the extent funded by the Development Contribution Plan (DCP) to facilitate the development of the Whitby Estate and support orderly and proper planning.		
		The proposed modifications to this infrastructure item have been formed in accordance wit the principles outlines in State Planning policy 3.6 – Infrastructure Contributions (SPP 3.6), particularly in relation to:		
		<b>Need and nexus</b> – the need and demand of the infrastructure items associated with the contribution area.		
		<b>Equity</b> – ensuring contributions are levied from identified stakeholders within the contributions for other road infrastructure items in DCA 3.		
		<b>Consistency</b> – ensuring the proposal arrangements are consistent wit the approach taken to establishing the current infrastructure item and arrangements to obtain contributions for other road infrastructure items in DCA 3.		
		In addition, this submission also outlines minor inconsistencies in the Proposed Scheme Amendment Documentation and associated		

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		DCP Reports primarily to ensure completeness with the existing DCP Reports.		
		Background		-
		As background, the Whitby Precinct A was endorsed by the WAPC in July 2012 and has been partially implemented, with approximately 600 lots delivered within Precincts 1-4 and stages within Precinct 5 currently under construction based upon subdivisions already approved. The recently lodged 'Precinct 6' subdivision application (WAPC ref no. 201377) will provide for a further 650 residential lots. A superlot subdivision application has also been lodged to create a development site of approximately 10 hectares (ha) to enable the future development and planning of the Whitby district centre in accordance with the Whitby Activity Centre Plan (ACP). Subdivision approval of WAPC ref no. 201377 is imminent.		
		This request to modify existing infrastructure item 'Skyline Bouevard' follows the lodgement of both subdivision applications which includes this infrastructure item. The extension of Skyline Boulevard in a northerly direction to Norman Road is a critical item required to facilitate subdivision and development of the Whitby Estate and the future Whitby district centre.  Overview		
		Skyline Boulevard is the key north-south road through the		

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		Whitby Estate and is identified as an 'Other Neighbourhood Connector' under the Structure Plan (refer <b>Figure 1</b> ). Skyline Boulevard is a 25m gazetted road reserve from Tinspar Avenue to Goodward Bouevard with constructed roundabouts at the southern and northern extents respectively.		
		Consistent with the Structure Plan, Skyline Boulevard will extend in a northerly direction from Goodward Boulevard to Norman Road. As identified on the Structure Plan as an 'Other Neighbourhood Connector', the proposed road reservation varies in width from 15m at the northern end, 24.5m at the south where it connects seamlessly with existing Skyline Boulevard to 36.3m as it's widest point.		
		The proposed road reservation will accommodate the planned street composition and cross-section intended for the Whitby Centre. The road composition of the extension north of the future district centre will feature a single carriageway (one lane each direction) separated by a wide physical median strip and protected on-road cycle lane in each direction and off-road cycle path on the western side. This road is capable of carrying up to 7,000 vehicles per day (vpd) (6,500vpd forecast).		
		A new priority T-intersection is proposed at the northern end of Skyline Boulevard with Norman Road. This intersection arrangement will improve the safety for turning vehicles entering/exiting the Estate. It is recommended that the existing priority-controlled T-intersection of Soldiers Road/		

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		Norman Road is subject to further investigations to explore the potential for the Norman Road westbound approach (eastern leg) to be widened to provide an additional traffic lane (two-lane approach) to be allocated as separate left turn only lane (30m length) and right turn only lane (long-lane).  In addition to the primary function and purpose of this road as the 'main street' for the District Centre and facilitate the future subdivision and development of 'Precinct 6' of the Whitby Estate, the road reservation will also provide an important road connection for bushfire purposes, providing emergency access/egress between residential development to the south and ultimately Norman Road to the north. This important infrastructure item is in line with local government priorities, applicable strategic planning and policy framework, and principles of the operational DCP and existing infrastructure item for Skyline Boulevard.		
		A comprehensive Transport Impact Assessment (TIA) has been prepared by PJA traffic consultants to substantiate the proposed extension of Skyline Boulevard between Goodward Boulevard and Norman Road. The TIA has been prepared to support the movement network as proposed under the Precinct 6 subdivision application and has been provided to the Shire through this process.  In addition to the primary function and purpose of this road as the 'main street' for the District Centre and facilitate the		

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		future subdivision and development of 'Precinct 6' of the Whitby Estate, the road reservation will also provide an important road connection for bushfire purposes, providing emergency access/egress between residential development to the south and ultimately Norman Road to the north. This important infrastructure item is in line with local		Recommendation
		government priorities, applicable strategic planning and policy framework, and principles of the operational DCP and existing infrastructure item for Skyline Boulevard.  A comprehensive Transport Impact Assessment (TIA) has been prepared by PJA traffic consultants to substantiate the proposed extension of Skyline Boulevard between Goodward Boulevard and Norman Road. The TIA has been prepared to support the movement network as proposed under the Precinct 6 subdivision application and has been provided to the Shire through this process.		

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		TECHNICAL SCHOOL  TECHNICAL SCHOOL  TECHNICAL SCHOOL  Activity Control 3.3 Activity Control Assessment under SPP 3.6	Legend  Larger Residential (RS-R (0)  Residential (RS-R (0)  Local Activity Nodes (R20-850)  Public Purpose  Indicative Open Space  Moniedal Brack Reserve  Subject Land  District Centile  Sum buffer to CCW  Major Access Stre		
		This submission has been prepared principles of SPP 3.6 as outlined proposal's compliance.	ared in accordance with guiding d below to demonstrate the		
		Table 1 – Assessment under SP	P 3.6		
		Guiding Principle	Assessment		

No	Submitter Comments		Officer Comment	Officer
				Recommendation
	Need and the nexus  The need for the infrastructure included in the plan must be clearly demonstrated (need) and the connection between the development and the demand created should be clearly established (nexus).	The infrastructure item is critical to enable subdivision and development of the land for the Whitby Estate. Other landowners within the DCA (and beyond) will also benefit from the extension of Skyline Boulevard as it will provide direct vehicle access between the future district centre and the surrounding local and district road network. The extension of Skyline Boulevard will provide a second point of access/egress, which can be utilised in an emergency event such as a bushfire, therefore benefiting the broader community. There is a clear need and nexus associated with this request, particularly when viewed in the context of the modification to the DCP to include the extension of Taylor Road/Adams Street between Mundijong  Road and Bishop Road. Just as this		Recommendation
		as the Shire to perform a district		
	No	Need and the nexus  The need for the infrastructure included in the plan must be clearly demonstrated (need) and the connection between the development and the demand created should be	Need and the nexus  The need for the infrastructure included in the plan must be clearly demonstrated (need) and the connection between the development and the demand created should be clearly established (nexus).  The infrastructure item is critical to enable subdivision and development of the land for the Whitby Estate. Other landowners within the DCA (and beyond) will also benefit from the extension of Skyline Boulevard as it will provide direct vehicle access between the future district centre and the surrounding local and district road network. The extension of Skyline Boulevard will provide a second point of access/egress, which can be utilised in an emergency event such as a bushfire, therefore benefiting the broader community.  There is a clear need and nexus associated with this request, particularly when viewed in the context of the modification to the DCP to include the extension of Taylor Road/Adams Street between Mundijong  Road and Bishop Road. Just as this road connection has been viewed	Need and the nexus The need for the infrastructure included in the plan must be clearly demonstrated (need) and the connection between the development and the demand created should be clearly established (nexus).  The infrastructure item is critical to enable subdivision and development of the land for the Whitby Estate. Other landowners within the DCA (and beyond) will also benefit from the extension of Skyline Boulevard as it will provide direct vehicle access between the future district centre and the surrounding local and district road network. The extension of Skyline Boulevard will provide a second point of access/egress, which can be utilised in an emergency event such as a bushfire, therefore benefiting the broader community. There is a clear need and nexus associated with this request, particularly when viewed in the context of the modification to the DCP to include the extension of Taylor Road/Adams Street between Mundijong Road and Bishop Road. Just as this road connection has been viewed

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		Transparency  Both the method for calculating the Cost Contribution and the manner in which it is applied should be clear, transparent and simple to understand and administer.	function, the request to include the northern extension of Skyline Boulevard is consistent with this approach and rationale.  The same method for calculating Cost Contribution as outlined in DCA 3 for the existing infrastructure item will apply to the extension of Skyline Boulevard to Norman Road.		
		Equity  Cost Contributions should be levied from all developments within a Development Contribution Area, based on their relative contribution to need.	As there are no changes to the existing method for calculation of the existing infrastructure item, this proposal will ensure that all additional costs are apportioned equitably based on developable area and demand for the infrastructure item.		

Submitter	No	Submitter Comments		Officer Comment	Officer Recommendation
Jupinitter	NO	Certainty  All Cost Contributions should be clearly identified and methods of accounting for cost adjustments determined at the commencement of a development.  Efficiency  Cost Contributions should be	The Proposed Scheme Amendment documentation and DCP Report contains clear documentation to ensure the associated costs for the infrastructure item is clearly identified, and how these costs will be apportioned.  To determine the costings of the additional extent of Skyline		Recommendation
		justified on a whole of life capital cost basis consistent with maintaining financial discipline on service providers by precluding over recovery of costs.	Boulevard, technical expert inputs can be provided by the developer and consultant team, if required. Alternatively, the appropriate information is included within the respective subdivision applications that facilitate the construction of this extension and will be further informed at the detailed engineering design stage.		
		Consistency  Cost Contributions should be applied uniformly across a Development Contribution	Consideration has been given to similar infrastructure items within DCA 3, including the existing extent of Skyline Boulevard and the function/ need and nexus of this		

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
		Area and the methodology for applying contributions should be consistent.  Right of consultation and review  Owners have the right to be consulted on the manner in which Cost Contributions are determined. They also have the opportunity to seek a review by an independent third party if they believe the calculation of the costs of the contributions is not reasonable.	existing item in comparison to the strategic and critical importance of the extension. A consistent approach is proposed.  Given the minor change to the scope of the existing infrastructure item and compliance with the principles of SPP 3.6 as outlined in this submission, the proposal would not be considered to adversely impact landowners or contributors to the DCP. However, if the Council considers necessary, there is the opportunity to seek further public comment and/or notification to affected landowners directly of this proposal.		
		Accountable  There must be accountability in the manner in which Cost Contributions are determined and expended.	As noted above, the proposal will follow the current approach to calculating Cost Contributions. No changes are anticipated to the Shire's methods that ensure		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		accountability in determining and expending cost contributions.		
		Proposed Modifications to Existing Infrastructure Item/ Scope		Schedule of
		The following modifications to the existing infrastructure item for Skyline Boulevard are outlined below (changes shown in red):		Modifications #7
		Skyline Boulevard (Neighbourhood Connector A) construction between Norman Road <del>Town Centre Distributor Road (VVhitby New Road)</del> and Tinspar Avenue:		
		<ul> <li>Land required that is in excess of a standard 20m reserve, to achieve a maximum 35m wide road reserve, plus additional land where necessary to accommodate channelization and/or roundabout construction at intersections.</li> </ul>		
		Earthworks for the whole road reserve.		
		<ul> <li>Complete road construction to a Liveable Neighbourhoods Connector A standard.</li> </ul>		
		<ul> <li>Associated drainage works including water sensitive urban design measures.</li> </ul>		
		<ul> <li>Traffic control devices including intersection treatments and associated works.</li> </ul>		
		Shared paths.		
		Utility removal, relocation, and insertion.		

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
		Associated costs including design costs.	, management, and Shire internal		
		· · · · · · · · · · · · · · · · · · ·	s 2 and 3 below generally focuses release of the previous iterations P Report No. 4 to ensure	Completed.	DCP Report level comment – n/a
		9.0 Land Valuation	Consistent with past DCP Reports, this section does not currently address land valuation for roads and open space. It is noted in the CAS, however it would be worthwhile clarifying this and making it more evident in this section - which rate applies residential or Non-residential for roads and open space.	Work in progress.	DCP Report level comment – n/a

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
		10.0 Method of Calculating Contributions	Consistent with past DCP Reports and in line with the above comment, Section 10 to address calculation methodology for other infrastructure items (roads, DOS, POS & Drainage).	Work in progress.	DCP Report level comment – n/a
		All figures	Shire to review image clarity, particularly for Figure 4 where it is hard to differentiate between 'remaining' and 'completed' roads. It would appear from the image that there are no 'part completed' roads.	Completed.	DCP Report level comment – n/a
		Appendix A: Need and Nexus —  - Item naming to be consistent with the SAR  - Ensure consistent application of internal Shire costs.  - Reference to "associated costs including design, management, and Shire internal costs" to be added to each item to be consistent with the SAR.			Schedule of Modifications Ref #5.
		<ul> <li>Appendix A: Need and Nexus:</li> <li>However, Shire to clarify appropriate to the control of t</li></ul>	·	The Shire recognises that project management costs are an essential component of infrastructure delivery, particularly where delivery is undertaken directly by the Shire rather than via developer pre-funding.  Historically, a line item titled "Costs associated with	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Further to this, Shire to confirm what the "Shire internal costs" include to ensure there is no overlap with other "administrative costs" and to ensure greater transparency.	Design and Management" has been included in DCP projects to capture this. However, the costing for this line has not previously incorporated internal Shire costs incurred during Shire-led delivery. Moving forward, the term "Shire Internal Costs" has been added for transparency and included in the cost estimates where applicable.  These costs, based on recent modelling for non-DCP projects, are estimated to average around 15% (revised from earlier advice of 18%) of the total project cost. This is not intended as an industry benchmark, but rather a reasonable forecast based on observed historical data for similar infrastructure projects managed by the Shire. It is acknowledged that developers delivering infrastructure directly are not subject to the same governance framework and typically use preferred suppliers without formal tendering, which results in lower overheads. The increase above typical developer project management costs (commonly 7–10%) reflects:  • Mandatory compliance with the Local Government Act, including public tender processes for both design and construction.  • Officer time spent on procurement governance, tender evaluation, and contract management,	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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			<ul> <li>often supplemented by consultants for high value tenders.</li> <li>Additional oversight and reporting processes inherent in public sector delivery.</li> <li>Importantly, these internal costs:</li> <li>Do not duplicate general DCP administration costs whereby a proportion of overhead cost for key employees reflects the anticipated time to be spent on the general running of the DCPs.  Additionally, staff involved in specific DCP projects will record that time via project-based timesheets to separate project work from the general administration pool, thus avoiding double counting.</li> <li>Will be reconciled to actuals at the time of delivery. The 18% represents a planning estimate only and will be superseded by actual internal costs when available.</li> </ul>	
			While most traditional DCP infrastructure is developer-delivered, this scope item is included across all projects as it is not always possible to identify in advance which projects (or portions thereof) may be Shire-delivered. The application of this cost to individual infrastructure items will be assessed at each Annual Report Review to reflect the best available	

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
				information at that time, and only applied to the section/value of the project the Shire is delivering. This allows for consistent treatment and ensures cost recovery is available if required, without impacting developer-delivered projects.	
				This approach is considered appropriate for inclusion within the DCPs under the following principles:	
				<ul> <li>Transparency: We have included this as a distinct cost category, which will be supported by time-based cost tracking to meet the principles of accountability and equity.</li> <li>Actuals reconciliation: Using actual costs rather than fixed estimates aligns with the requirement for costs to be reasonable and reflective of the actual cost of infrastructure.</li> </ul>	
				The anticipated 15% on-cost is provided as a guideline only and the actual percentage applied within the cost schedules will be confirmed at each DCP Report revision, where those costs will be subject to review by MIRG and BIRG. The Amendment requests only the inclusion of the line item as an applicable cost.	
		Appendix A: Need and Nexus	Where items are 'completed', Shire to confirm whether these are to be taken out of the DCP (Scheme) or	Completed or removed items for which any amount of DCP monies have been expended should remain in the DCP so that the total costs collected match the total	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		not? Past advice has been that they need to remain in the Scheme even if complete, however the Traditional DCP includes 'completed' items, however the CIDCP excludes 'completed' items.  Appendix A: Need and Nexus - Adams/Cockram St PS NOS and G1 North POS NOS:  SAR states that costs are shared with the Department of Education, however DCP Report states that the playing field will be accommodated wholly within a future Shire reserve, funded by the DCP. Ensure consistency between the documents.	costs expended at the end of the DCP. Items removed for which no monies have been expended can be removed, as any costs collected for those items to date are reallocated to offset remaining projects.  The DCPs will be updated to reflect the Amendment once gazetted in this respect.	Schedule of Modifications #1
		Appendix A: Need and Nexus - Bishop Road East:  Scope to align with that included within SAR. SAR states "Traffic control devices including one set of traffic lights and one roundabout" and "Upgrade of one existing at-grade rail crossing" which does not align with intersection treatments and traffic control devices listed in DCP Report.	At grade crossing noted in DCP Report only – admin error, has been removed.  Support removal of intersection specifics.	Schedule of Modifications #5.

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		<ul> <li>New Whitby Rd (Goodwood Blvd):         <ul> <li>As the Shire's Planning Officers would be aware, the western section of Goodwood Blvd abutting the future Whitby District Centre widens beyond 30m. The DCP should allow for areas of localised widening beyond the standard 30m.</li> <li>The above comment also applies (west of Soldiers Road to Taylor Road, where the LSP identifies a 35.6m wide road reserve.</li> </ul> </li> </ul>		Schedule of Modifications #5
		Skyline Boulevard:     Refer comments contained in this submission to modify extent of Skyline Boulevard from Tinspar Avenue to Norman Road.		Schedule of Modifications #7
		<ul> <li>Taylor Road/Adams St:</li> <li>Scope to align with that included within SAR. SAR states         "Traffic control devices including one set of traffic lights and         one roundabout" and "Upgrade of one existing at-grade rail         crossing" which does not align with intersection treatments         and traffic control devices listed in DCP Report.</li> </ul>	At grade crossing noted in DCP Report only – admin error, has been removed.  Support removal of intersection specifics.	Schedule of Modifications #5
		<ul> <li>Taylor/Scott Rd PS NOS:</li> <li>Report states "Amendment 7 replaces this NOS with the NOS further north referred to as Adams/Cockram St PS NOS, to</li> </ul>	Completed.	Report Level Comment - n/a

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		reflect the latest approved structure plans" however this statement should refer to the NOS further south.		
		Whitby (Reilly Road) DSS:		
		<ul> <li>Report states "Amendment 7 replaces this item with the G1         North PS NOS" however this statement is incorrect as it should         refer to Taylor/Scott Rd PS NOS being replaced by G1 North PS             NOS.     </li> </ul>		
		<ul> <li>Report states "All community buildings and clubroom facilities are funded separately through the CIDCP", however this has been removed from the CIDCP and now includes the adventure playground only.</li> </ul>		
		Appendix B: Cost Apportionment Schedule - Shire to confirm that the daily escalation rates are consistent with the rates under the WALGA December 2024 Quarterly Economic Briefing, which states a \$0.986 daily increase.	Confirmed – further information added to the CAS for clarity.	DCP Report level comment – n/a
		Shire to confirm that cost(\$) remaining for Skyline Boulevard is accurate at today's date - currently suggests \$1,512,777.00 remaining.	Confirmed correct at the time the report was published – noting that this item is now complete and remaining funds are zero (pending recommendations in the Amendment regarding the extension).	-

Submitter	No	Submitter Comments		Officer Comment	Officer Recommendation
		1	liture Plan: Whitby DSS and Taylor/ 'complete", however the more ay be "removed"?	Will be removed from the report upon gazettal of the Amendment.	DCP Report level comment – n/a
		Appendix C: Capital Expenditure Plan	Priority items and timing in SAR and Appendix C to be consistent.     We query whether some items should be brought forward consistent with developer discussions and Shire intentions - e.g.Skyline Boulevard.	Timings to be updated as per the Schedule of Modifications. Ensuing reports will reflect those changes.  It is noted that the priority order is based on the completion date for the full item.	Schedule of Modifications #6
		Appendix D: Lots/m2 Area Report	<ul> <li>Shire to ensure that the figures within the Traditional DCP Report(s) and CIDCP Report align as there would appear to be inconsistencies between the two.</li> <li>Include lot estimates from proposed Watkins Road North Precinct C2 LSP.</li> </ul>	Items in different DCPs will not necessarily align due to differing start and end dates. The CIDCP does not include for non-residential lot count.  Details for Watkins Road North are updated for the next revision.	DCP Report level comment – n/a
		Appendix H: Infrastructure Land Detail Report	Shire to ensure that the figures within the Traditional DCP Report(s) and CIDCP Report align	The CIDCP does not include land.  Details for Watkins Road North are updated for the next revision.	DCP Report level comment – n/a

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
		Appendix I: Public Open Space and Drainage Land Detail Report	<ul> <li>as there would appear to be inconsistencies between the two.</li> <li>Include land areas from proposed Watkins Road North Precinct C2 LSP.</li> <li>Shire to ensure that the figures within the Traditional DCP Report(s) and CIDCP Report align as there would appear to be inconsistencies between the two.</li> <li>Include POS &amp; Drainage areas from</li> </ul>	The CIDCP does not include land.  Details for Watkins Road North are updated for the next revision.	DCP Report level comment – n/a
		Table 3 DCA 4 Report No. 4  Section	proposed Watkins Road North Precinct C2 LSP.  Comment	Reference has been updated.	DCP Report level comment – n/a
		1.0 Purpose	Reference should include     Mundijong-Whitby DSP as a     relevant document.		

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
		7.0 Items included in the Plan	Text under 'Community Facilities' and 'Facilities' overlaps. Consider combining the two.	Has been updated.	DCP Report level comment – n/a
		8.0 Non-Infrastructure Items Included within the DCP	List of administrative costs should be consistent with those listed in the SAR.	Has been updated.	DCP Report level comment – n/a
		9.0 Land Valuation	If this section is not considered to be relevant to the CIDCP section renumbering to be corrected.	Prefer to maintain consistency of numbering for ease of automation and consistency of reference for users. It is marked as N/A in the CIDCP where required.	DCP Report level comment – n/a
		12.0 DCP Credits	Text to be updated to refer to community infrastructure/building/facilities instead of "land for infrastructure" as the land component is included under the Traditional DCP.  Comments in relation to prefunding are still relevant to the CIDCP however.	Updated.	DCP Report level comment – n/a
		All figures	<ul> <li>Shire to review image clarity.</li> <li>Figure 3 wording and numbering should be updated to be consistent with the naming in the SAR and to</li> </ul>	To be updated for next Report revision.	DCP Report level comment – n/a

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		include all facilities (e.g. Mundijong Dog Park not shown) on Figure 3.		
		Appendix A: Need and Nexus:		Schedule of Modifications #5
		<ul> <li>Appendix A: Need and Nexus</li> <li>However, Shire to clarify appropriateness as SAR states that         "While most traditional infrastructure is pre-funded by         developers, internal costs will primarily apply to CIDCP projects.         However, it is not possible to identify upfront which traditional         projects, or portions thereof, will ultimately be delivered by the         Shire.</li> <li>Therefore, the updated line item is reflected in each project but is         not expected to apply to most "traditional projects."</li> </ul>	The application of this cost to individual infrastructure items will be assessed at each Annual Report Review to reflect the best available information at that time, and only applied to the section/value of the project the Shire is delivering. This allows for consistent treatment and ensures cost recovery is available if required, without impacting developer-delivered projects.	No modifications Recommended
		Where items are 'completed', Shire to confirm whether these are to be taken out of the DCP (Scheme) or not? Past advice has been that they need to remain in the Scheme even if complete, however the Traditional DCP includes 'completed' items, however the CIDCP excludes 'completed' items.	Completed or removed items for which any amount of DCP monies have been expended should remain in the DCP so that the total costs collected match the total costs expended at the end of the DCP. Items removed for which no monies have been expended can be	No Modifications Recommended

Submitter	No	Submitter Comments		Officer Comment	Officer
					Recommendation
				removed, as any costs collected for those items to date are reallocated to offset remaining projects.	
		- I	OCP Report includes parking, however not sure consistency between the documents.		Schedule of Modifications #3
		Appendix A: Need and Nexus	Whitby Playground:     Scope items in the SAR states     "associated external works     including utilities" however not     listed in the DCP Report. Ensure     consistency between the     documents.	Updated.	DCP Report level comment – n/a
			e daily escalation rates are consistent with LGA December 2024 Quarterly Economic \$0.115 daily increase.	Confirmed – further information added to the CAS for clarity.	-
		Appendix B: Cost Apportionment Schedule	<ul> <li>Application of grant for Keirnan         Park DSS is supported, however we             question why the DCP is funding             the majority of the balance (89%)             and the Shire funding only (11%)             when the previous DCP has     </li> </ul>	The Shire's contribution within the CIDCP is based on the existing population within the relevant item catchment at the time the CIDCP commenced. Initially, the full grant amount was allocated toward the DSS which covered the CIDCP scope. However, Council has since resolved to prioritise allocation of	DCP Report level comment – n/a

Submitter	No	Submitter Comments		Officer Comment	Officer Recommendation
			assumed all grant funding. We question why the DCP should be carrying the majority of the cost burden.	the grant funding toward facilitating works that which fall outside the DSS/DCP scope, but which are necessary to be completed either prior to or alongside the DCP works. Any remaining grant funds are then allocated to the DSS/DCP scope in accordance with the same cost apportionment ratios applied within the plan	
			ott Road NOS both state "complete", riate terminology may be "removed"?	To be removed in next Report Revision.	DCP Report level comment – n/a
		Appendix C: Capital Expenditure Plan	<ul> <li>Priority items and timing in SAR and Appendix C to be consistent.</li> <li>Timing to be reviewed and confirmed based on developers intentions/ pre-funding arrangements.</li> </ul>		Schedule of Modifications #6
		Appendix D: Lots/m2 Area Report	<ul> <li>Shire to ensure that the figures within the Traditional DCP Report(s) and CIDCP Report align as there would appear to be inconsistencies between the two.</li> <li>Include lot estimates from proposed Watkins Road North Precinct C2 LSP.</li> </ul>	Items in different DCPs will not necessarily align due to differing start and end dates. The CIDCP does not include for non-residential lot count.  Details for Watkins Road North are updated for the next revision.	DCP Report level comment – n/a

Submitter	No	Submitter Comments		Officer Comment	Officer Recommendation
		Appendix H: Infrastructure Land Detail Report	Shire to confirm if this appendix should be removed from the DCP Report.	Prefer to maintain consistency of numbering for ease of automation and consistency of reference for users. It is marked as N/A in the CIDCP where required.	DCP Report level comment – n/a
		Appendix I: Public Open Space and Drainage Land Detail Report	Shire to confirm if this appendix should be removed from the DCP Report.	Prefer to maintain consistency of numbering for ease of automation and consistency of reference for users. It is marked as N/A in the CIDCP where required.	DCP Report level comment – n/a
		savings to the DCA, particularly contribution costs for DCA 3 is these increases are largely as a costs and escalation rates. Who continue to review with an att	of the Shire's efforts to maximise cost y DCA 4. Whilst the increase in a not favoured, it is acknowledged that a result of increases in construction herever possible, the Shire should tempt to avoid repeatedly increases her funding mechanisms such as grant		-
		item has been formed in according SPP 3.6 and is considered to be to facilitate subdivision and de	the Skyline Boulevard infrastructure rdance with the principles outlined in e a critical infrastructure item required evelopment of 'Precinct 6' of the district centre for the Mundijonglocality.		

Submitter No		Submitter Comments Officer Comments	Officer Comment	Officer
				Recommendation
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		We trust that this submission is sufficiently justified and seek the Shire's consideration of this request.		
IN25/5886		Submission on Amendment No. 7 to Shire of Serpentine Jarrahdale		-
Taylor Burrell		Local Planning Scheme No. 3- amending Infrastructure Contributions area and inclusions		
Barnett on		Thank you for the opportunity to lodge a submission on the		
behalf of		Shire of Serpentine Jarrahdale Scheme Amendment No. 7. This		
LWP		submission has been prepared on behalf of LWP Byford		
Byford		Syndicate Pty Ltd (Satterley Property Group), responsible for		
Syndicate		the development of the Glades Estate, Byford.		
Pty Itd		Firstly, we acknowledge our support for the reduction to the		
Katherine		cost and scope of individual community infrastructure items		
Shirley,		and focus on alternative funding arrangements such as grant		
Level 7/160		funding, and we commend the Shire for its vision and		
St Georges		foresight in this regard.		
Terrace, Perth WA		Submission		
6000		General Comments - DCP Reports		
		Given the Shire's recent minor annual review of Development		
		Contribution Plans (as adopted by Council at its Ordinary		
		Council Meeting of 10 <sup>th</sup> February 2025) and comments		
		provided to the Shire for Development Contribution Area 1		
		(DCA1)- Byford Traditional Infrastructure on behalf of		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Satterley Property Group, this review represents a high-level review only.		
		The main purpose of this submission is to outline minor comments and inconsistencies in the Proposed Scheme Amendment Documentation and associated DCP Reports primarily to ensure completeness with the existing DCP Reports.		
		The comments provided in <b>Tables 1 and 2</b> below generally focuses on changes undertaken since the release of the previous iterations of Draft DCA1 Report No. 9 and Draft Development Contribution Area 4 (DCA4)- Community Infrastructure Report No. 4 to ensure consistency and completeness of reporting.		
		Table 1 Draft DCA 1 Report No. 9	Admin items updated to reflect SAR.	DCP Report level
		8.0 Non-Infrastructure Items Included within the DCP	Individual areas of land for POS and Drainage are not	comment – n/a
		List of administrative costs should be consistent with those listed in the Scheme Amendment Report (SAR).	usually detailed in the DCP report, however given the uniqueness of this instance, officers agree that it warrants explanation and transparency. The following	
		As the SAR states that the Orton Road Resource Enhancement Wetland (REW) buffer is included in the DCP, this would be worth	wording will be included within the DCP report under the Land for POS and Drainage section:	
		reiterating under 'Land for Public Open Space and Drainage'.	"While the Cardup Brook foreshore and associated wetland buffer may not meet the traditional criteria	
			for active open space, its function within the urban	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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			environment and planning context supports its treatment as creditable public open space.	
			Under Liveable Neighbourhoods, foreshore reserves that are accessible, usable, and form part of a structured open space network can be included in POS calculations, provided they contribute to the recreational, environmental, and visual amenity of the community. In this case:	
			The wetland buffer is required under environmental and planning approvals as a condition of urban development, meaning it is a cost borne by new development—not a legacy environmental issue.	
			<ul> <li>The buffer will form part of the broader open space reserve, contributing to the visual and passive recreational experience (e.g. walking paths, seating areas, lookouts).</li> </ul>	
			The land is being ceded to the Crown and managed by the local government for public benefit, consistent with POS land under SPP 3.6.	
			Although parts of the buffer may not be suitable for active recreation, the public accessibility, amenity contribution, and integration with the open space network justify its inclusion as creditable land in the	

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
			DCP, in line with established practice across Western Australia."	
		9.0 Land Valuation 10.0 Method of Calculating Contributions All figures	The principles and methodology for land valuation is detailed in the report, however Officers will look into providing further clarity of wording within the next revision.	DCP Report level comment – n/a
		Appendix A: Need and Nexus		
		<ul> <li>Consistent with past DCP Reports, this section does not currently address land valuation for roads and open space.</li> <li>It is noted in the CAS, however it would be worthwhile clarifying this and making it more evident in this section - which rate applies residential or Non-residential for roads and open space.</li> </ul>		
		<ul> <li>Consistent with past DCP Reports and in line with the above comment, Section 10 to address calculation methodology for other infrastructure items (roads, DOS, POS &amp; Drainage).</li> </ul>		
		Shire to review image clarity, particularly for Figure 4 where it is hard to differentiate between 'remaining' and 'completed' roads. It would appear from the image that there are no 'part completed' roads. Shire to clarify.	Requires assistance from the QGIS team. Will update this ahead of the next revision.	DCP Report level comment – n/a
		<ul> <li>Item naming to be consistent with the SAR.</li> <li>Ensure consistent application of internal Shire costs.</li> </ul>		Schedule of Modifications #4 & #5

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		<ul> <li>Reference to "associated costs including design, management, and Shire internal costs" to be added to each item to be consistent with the SAR.</li> <li>However, Shire to clarify appropriateness as SAR states that "While most traditional infrastructure is pre-funded by developers, internal costs will primarily apply to CIDCP projects.          However, it is not possible to identify upfront which traditional projects, or portions thereof, will ultimately be delivered by the Shire. Therefore, the updated line item is reflected in each project, but is not expected to apply to most traditional projects."     </li> <li>Further to this, Shire to confirm what the "Shire internal costs" include to ensure there is no overlap with other "administrative costs" and to ensure greater transparency.</li> </ul>	The Shire recognises that project management costs are an essential component of infrastructure delivery, particularly where delivery is undertaken directly by the Shire rather than via developer pre-funding. Historically, a line item titled "Costs associated with Design and Management" has been included in DCP projects to capture this. However, the costing for this line has not previously incorporated internal Shire costs incurred during Shire-led delivery. Moving forward, the term "Shire Internal Costs" has been added for transparency and included in the cost estimates where applicable.  These costs, based on recent modelling for non-DCP projects, are estimated to average around 15% (revised from earlier advice of 18%) of the total project cost. This is not intended as an industry benchmark, but rather a reasonable forecast based on observed historical data for similar infrastructure projects managed by the Shire. It is acknowledged that developers delivering infrastructure directly are not subject to the same governance framework and	No Modifications Recommended
			typically use preferred suppliers without formal	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
	1			
			increase above typical developer project management costs (commonly 7–10%) reflects:	
			<ul> <li>Mandatory compliance with the Local Government Act, including public tender processes for both design and construction.</li> <li>Officer time spent on procurement governance, tender evaluation, and contract management, often supplemented by consultants for high value tenders.</li> <li>Additional oversight and reporting processes inherent in public sector delivery.</li> </ul>	
			<ul> <li>Importantly, these internal costs:</li> <li>Do not duplicate general DCP administration costs whereby a proportion of overhead cost for key employees reflects the anticipated time to be spent on the general running of the DCPs.         Additionally, staff involved in specific DCP projects will record that time via project-based timesheets to separate project work from the general administration pool, thus avoiding double counting.</li> <li>Will be reconciled to actuals at the time of delivery. The 18% represents a planning estimate</li> </ul>	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
			only and will be superseded by actual internal costs when available.  While most traditional DCP infrastructure is developer-delivered, this scope item is included across all projects as it is not always possible to identify in advance which projects (or portions thereof) may be Shire-delivered. The application of this cost to individual infrastructure items will be assessed at each Annual Report Review to reflect the best available information at that time, and only applied to the section/value of the project the Shire is delivering. This allows for consistent treatment and ensures cost	
			recovery is available if required, without impacting developer-delivered projects.  This approach is considered appropriate for inclusion within the DCPs under the following principles:  Transparency: We have included this as a distinct cost category, which will be supported by time-based cost tracking to meet the principles of accountability and equity.  Actuals reconciliation: Using actual costs rather than fixed estimates aligns with the requirement for costs to be reasonable and reflective of the actual cost of infrastructure.	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
			The anticipated 15% on-cost is provided as a guideline only and the actual percentage applied within the cost schedules will be confirmed at each DCP Report revision, where those costs will be subject to review by MIRG and BIRG. The Amendment requests only the inclusion of the line item as an applicable cost.	
		Where items are 'completed', Shire to confirm whether these are to be taken out of the DCP (Scheme) or not? Past advice has been that they need to remain in the Scheme even if complete, however the Traditional DCP includes 'completed' items, however the CIDCP excludes 'completed' items.	Completed or removed items for which any amount of DCP monies have been expended should remain in the DCP so that the total costs collected match the total costs expended at the end of the DCP. Items removed for which no monies have been expended can be removed, as any costs collected for those items to date are reallocated to offset remaining projects.	
			The DCPs will be updated to reflect the Amendment once gazetted in this respect.	
		Doley Road (to Orton): Scope should include intersection treatments and traffic control devices for the intersection with Allanson Road (i.e. roundabout as identified on the Glades LSP).	Assumed to be a DCP Report level comment.  Consistent with other items, this intersection will be added to the respective DCP Report, and thus flexible as planning develops. We do not note specific intersections within the Amendment to maintain flexibility as planning progressed.	DCP Report level comment – n/a
		Indigo Parkway:	Admin error in report only, has been removed from the Report.	DCP Report level comment – n/a

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		Scope refers to "one at-grade crossing", however this would		
		not appear to be relevant as there is no crossing of the rail.  The Glades DOS: Reference is made to futsal hardcourts (x2) in the description and the scope refers to "hard landscaping" and "public toilets". Based on clarification provided in the Community Infrastructure DCP Reports that the scope of construction in that DCP is confined to above "ground works", we question if it is more appropriate that these items are community infrastructure items as opposed to traditional infrastructure and therefore funded by DCA4.	This item has been previously justified and endorsed through Amendment 208.  Public toilets and hard landscaping elements such as futsal courts are considered essential to the core function of the District Open Space (DOS) and are delivered in conjunction with the site's ground-level works. As such, their inclusion in the Traditional DCP is appropriate.	No Modifications Recommended
			While built structures such as pavilions and community buildings are generally included in the Community Infrastructure DCP (CIDCP), this distinction is based on the primary function and scale of the facility rather than simply whether it is "above ground." Public toilets within DOS are typically minor, utility-based structures integral to recreation use and amenity, and are more appropriately delivered as part of the overall park development package.	
			<ul> <li>This approach supports:</li> <li>Efficient and coordinated delivery of DOS infrastructure.</li> </ul>	

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
			<ul> <li>Alignment with SPP 3.6 principles of need, nexus and transparency.</li> </ul>	
			Accordingly, the inclusion of these items in the Traditional DCP remains justified and consistent with the broader DCP framework.	
		Appendix B: Cost ApportionmentSchedule		-
		Appendix C: Capital Expenditure Plan		
		Appendix D: Lots/m2 Area Report		
		Appendix H: Infrastructure Land Detail Report		
		Appendix I: Public Open Space and Drainage Land Detail Report		
		Shire to confirm that the daily escalation rates are consistent with the rates under the WALGA December 2024 Quarterly Economic Briefing, which states a \$1.344 daily increase.	Confirmed – further information added to the CAS for clarity.	DCP Report level comment – n/a
		Priority items and timing in SAR and Appendix C to be consistent. We query whether some items should be brought forward consistent with developer discussions and Shire intentions - e.g. Orton Road DOS, Glades District Community Facility and Cardup Brook Themed Nature Park.	Timings to be updated as per the Schedule of Modifications. Ensuing reports will reflect those changes.  It is noted that the priority order is based on the completion date for the full item.	Schedule of Modifications #6

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Shire to ensure that the figures within the Traditional DCP Report(s) and CIDCP Report align as there would appear to be inconsistencies between the two.	Items in different DCPs will not necessarily align due to differing start and end dates. The CIDCP does not include for non-residential lot count or land.	DCP Report level comment – n/a
		Table 2 Draft DCA 4 Report No. 4  1.0 Purpose	Reference has been updated.	DCP Report level comment – n/a
		<b>7.0 Items included in the Plan</b> Reference should include Mundijong-Whitby DSP as a relevant document.		
		Text under 'Community Facilities' and 'Facilities' overlaps. Consider combining the two.	Updated for next report.	DCP Report level comment – n/a
		<ul> <li>Non-Infrastructure Items Included within the DCP</li> <li>Land Valuation</li> </ul>	Updated for next report.	DCP Report level comment – n/a
		12.0 DCP Credits		
		All figures		
		Appendix A: Need and Nexus		
		List of administrative costs should be consistent with those listed in the SAR.		
		If this section is not considered to be relevant to the CIDCP section renumbering to be corrected.	Prefer to maintain consistency of numbering for ease of automation and consistency of reference for users. It is marked as N/A in the CIDCP where required.	DCP Report level comment – n/a

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		Text to be updated to refer to community infrastructure/building/facilities instead of "land for infrastructure" as the land component is included under the Traditional DCP. Comments in relation to pre-funding are still relevant to the CIDCP however.	Updated for next report.	DCP Report level comment – n/a
		Shire to review image clarity.	Completed.	DCP Report level comment – n/a
		Figure 3 wording and numbering should be updated to be consistent with the naming in the SAR and to include all facilities (e.g. Orton Road DSS not shown) on Figure 3.	Officers to work on this with the QGIS team ahead of the next report revision.	DCP Report level comment – n/a
		Item naming to be consistent with the SAR.  Ensure consistent application of internal Shire costs.  Reference to "associated costs including design, management, and Shire internal costs" to be added to each item to be consistent with the SAR.		Schedule of Modifications Ref #4 and #5
		However, Shire to clarify appropriateness as SAR states that "While most traditional infrastructure is pre-funded by developers, internal costs will primarily apply to CIDCP projects. However, it is not possible to identify upfront which traditional projects, or portions thereof, will ultimately be delivered by the Shire. Therefore, the updated line item is reflected in each project but is not expected to apply to most traditional projects."	The Shire recognises that project management costs are an essential component of infrastructure delivery, particularly where delivery is undertaken directly by the Shire rather than via developer pre-funding. Historically, a line item titled "Costs associated with Design and Management" has been included in DCP projects to capture this. However, the costing for this line has not previously incorporated internal Shire	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
Submitter	No	Submitter Comments	costs incurred during Shire-led delivery. Moving forward, the term "Shire Internal Costs" has been added for transparency and included in the cost estimates where applicable.  These costs, based on recent modelling for non-DCP projects, are estimated to average around 15% (revised from earlier advice of 18%) of the total project cost. This is not intended as an industry benchmark, but rather a reasonable forecast based on observed historical data for similar infrastructure projects managed by the Shire. It is acknowledged that developers delivering infrastructure directly are not subject to the same governance framework and typically use preferred suppliers without formal tendering, which results in lower overheads. The increase above typical developer project management costs (commonly 7–10%) reflects:  • Mandatory compliance with the Local Government Act, including public tender processes for both design and construction.  • Officer time spent on procurement governance,	
			tender evaluation, and contract management, often supplemented by consultants for high value tenders.	
			<ul> <li>Additional oversight and reporting processes inherent in public sector delivery.</li> </ul>	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
			<ul> <li>Importantly, these internal costs:</li> <li>Do not duplicate general DCP administration costs whereby a proportion of overhead cost for key employees reflects the anticipated time to be spent on the general running of the DCPs.         Additionally, staff involved in specific DCP projects will record that time via project-based timesheets to separate project work from the general administration pool, thus avoiding double counting.</li> <li>Will be reconciled to actuals at the time of delivery. The 18% represents a planning estimate only and will be superseded by actual internal costs when available.</li> </ul>	
			While most traditional DCP infrastructure is developer-delivered, this scope item is included across all projects as it is not always possible to identify in advance which projects (or portions thereof) may be Shire-delivered. The application of this cost to individual infrastructure items will be assessed at each Annual Report Review to reflect the best available information at that time, and only applied to the section/value of the project the Shire is delivering. This allows for consistent treatment and ensures cost recovery is available if required, without impacting developer-delivered projects.	

Submitter	No	Submitter Comments	Officer Comment	Officer
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			<ul> <li>This approach is considered appropriate for inclusion within the DCPs under the following principles:</li> <li>Transparency: We have included this as a distinct cost category, which will be supported by time-based cost tracking to meet the principles of accountability and equity.</li> <li>Actuals reconciliation: Using actual costs rather than fixed estimates aligns with the requirement for costs to be reasonable and reflective of the actual cost of infrastructure.</li> <li>The anticipated 15% on-cost is provided as a guideline only and the actual percentage applied within the cost schedules will be confirmed at each DCP Report revision, where those costs will be subject to review by MIRG and BIRG. The Amendment requests only the inclusion of the line item as an applicable cost.</li> </ul>	
		Where items are 'completed', Shire to confirm whether these are to be taken out of the DCP (Scheme) or not? Past advice has been that they need to remain in the Scheme even if complete, however the Traditional DCP includes 'completed' items, however the CIDCP excludes 'completed' items.	Completed or removed items for which any amount of DCP monies have been expended should remain in the DCP so that the total costs collected match the total costs expended at the end of the DCP. Items removed for which no monies have been expended can be removed, as any costs collected for those items to date are reallocated to offset remaining projects.	

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
			The DCPs will be updated to reflect the Amendment once gazetted in this respect.	
		<b>Orton Road DOS:</b> Item in the DCP Report refers to the REW, however this scope item is included under the Traditional DCP and not the Community Infrastructure DCP.	Updated for next report.	DCP Report level comment – n/a
		<b>Glades District Community Facility:</b> Reference to building size to be included consistent with all other infrastructure items.		Schedule of Modifications #2
		Cardup Brook Themed Nature Park: Shire to confirm that the scope aligns with recent discussions with the Shire and Glades project team (February/March 2025).	Council has resolved however is to work collaboratively with the developer to see if there is the opportunity for the nature playground to be added onto the developer business as usual public space improvements and then potentially add funding from Lotterywest, to determine if a larger regional playground can be delivered. This does not change the scope of the playground the DCP will fund, and only potentially changes the location, noting that it would still be in the Cardup Brook vicinity. The only change would thus be the location map in the DCP report. This change would be reflected in the DCP Report Revision following the applicable Council Resolution.	No Modifications Recommended
		Appendix B: Cost		-
		Apportionment Schedule		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Appendix C: Capital		
		Expenditure Plan		
		Appendix D: Lots/m2 Area Report		
		Appendix H: Infrastructure Land		
		Detail Report		
		Appendix I: Public Open Space and Drainage Land Detail Report		
		Shire to confirm that the daily escalation rates are consistent with the rates under the WALGA December 2024 Quarterly Economic Briefing, which states a \$0.115 daily increase.	Confirmed – further information added to the CAS for clarity.	DCP Report level comment – n/a
		Application of grant for Keirnan Park DSS is supported, however we question why the DCP is funding the majority of the balance (89%) and the Shire funding only (11%) when the previous DCP has assumed all grant funding. We question why the DCP should be carrying the majority of the cost burden.	The Shire's contribution within the CIDCP is based on the existing population within the relevant item catchment at the time the CIDCP commenced. Initially, the full grant amount was allocated toward the DSS which covered the CIDCP scope. However, Council has since resolved to prioritise allocation of the grant funding toward facilitating works that which fall outside the DSS/DCP scope, but which are necessary to be completed either prior to or alongside the DCP works. Any remaining grant funds are then allocated to the DSS/DCP scope in accordance with the same cost apportionment ratios applied within the plan.	DCP Report level comment – n/a

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Priority items and timing in SAR and Appendix C to be consistent.  Timing to be reviewed and confirmed based on developers intentions/ pre-funding arrangements.  Shire to ensure that the figures within the Traditional	Items in different DCPs will not necessarily align due	Schedule of modifications #6  DCP Report level
		DCP Report(s) and CIDCP Report align as there would appear to be inconsistencies between the two.	to differing start and end dates. The CIDCP does not include for non-residential lot count or land.	comment – n/a
		Shire to confirm if this appendix should be removed from the DCP Report.	Prefer to maintain consistency of numbering for ease of automation and consistency of reference for users. It is marked as N/A in the CIDCP where required.	DCP Report level comment – n/a
		This submission is supportive of the Shire's efforts to maximise cost savings to the DCA, particularly DCA 4. Whilst the increase in contribution costs for DCA 1 is not favoured, it is acknowledged that these increases are largely as a result of increases in construction costs and escalation rates. Wherever possible, the Shire should continue to review with an attempt to avoid repeatedly increases contribution costs through other funding mechanisms such as grant funding.		-
IN25/5887  QUBE		Thank you for the opportunity to provide comment on Amendment 7 to the Shire of Serpentine Jarrahdale Local Planning Scheme No. 3, which addresses Development Contribution Plans (DCPs) for		-
Stephen Carter, Suite 3, Level 1,		the Byford, Whitby, and Mundijong localities, for traditional and community infrastructure. We start this submission by supporting Amendment 7 as only by reviewing development contribution plans can they remain contemporary and fit for		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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437 Roberts Road, Subiaco WA 6008.		purpose.  QUBE writes this submission based on having a controlling interest in Lot 492 Galvin Road (Precinct C1), Lot 167 Adams Street (Precinct E1) and Lot 9503 Watkins Road (Precinct E3), Mundijong with all land parcels identified for future residential development.  Consequently, this submission concerns itself with changes to Development Contribution Plan 3 (Mundijong Urban) and Development Contribution Plan 4 (Community Infrastructure), as proposed by Amendment 7.		
		DCP Area Expansion  We acknowledge and support that Amendment 7 expands the DCP area to recognise subsequent urban, or soon to be urban zoned land, such as Lot 30 Soldiers Road, Cardup. This ensures all developable land is fairly and equitably contributing to the funding of key infrastructure.		
		Development Potential Assumption  QUBE notes that to calculate the development potential for Precincts C1 (Lot 492) and Precinct E3 (Lot 9503), the Shire has	Updated lot assessment received from Qube and adjusted in the Report for the next revision.	DCP Report level comment – n/a
		adopted an R25 code given no structure plans exist for these precincts (as taken from the respective draft Contribution Plan Reports); however, as has already been discussed at length with the Shire, the yield assumptions for Mundijong are high and have not accounted for several site constraints, subsequent Planning Control Areas and land reserved for non-residential purposes. As	No significant discrepancy.	

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		such, the yield assumptions for Mundijong must be considered in this context. QUBE's yield analysis for Mundijong, prepared by Rowe and Associate, has been provided to the Shire but can be provided again upon request.		
		QUBE agrees with the Shire that the current DCP framework is currently funding an infrastructure scope that could bring the viability of projects into question in the short to medium term, potentially delaying residential lots being brought to market. Therefore, the Shire's approach in deleting infrastructure items that have been funded through alternative sources or have their delivery timeframes beyond that of the DCP (15 years or the year 2023) is appropriate and supported by QUBE.		-
		QUBE encourages the Shire to continue seeking alternative funding sources to help in the delivery of necessary infrastructure rather than simply relying on funding to come from the DCP, especially given much of the community services serve a broader catchment than just Mundijong, including many existing residents. Any		
		funding obtained external to the DCP should then be reflected in ongoing reviews and the contributions from developers adjusted accordingly.		
		One item that has been expanded upon is the extension of Taylor Road/Adams Street (Integrator B) upgrade between Bishop Road and Mundijong Road, noting that under the current DCP provisions, this stops at Keirnan Road. The inclusion of this road through to		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Mundijong Road is supported as it reflects the importance of this road as a key north-south connection within Mundijong.		
		In conclusion, we support proposed Amendment 7, making for a more contemporary DCP for the Mundijong locality. QUBE will continue discussions with the Shire over the development potential assumption for Mundijong, as our respective structure plans are advanced.		
IN25/5915 CLE Town Planning on behalf of Parcel Property Merri Chen, 2 Abbotsford St, West Leederville, WA 6007		Thank you for the opportunity to comment on advertised Amendment 7 to Local Planning Scheme No. 3 ('the Amendment'), which proposes changes to the various Development Contribution Plans ('DCPs') within the Shire. CLE Town Planning + Design makes this submission on behalf of Parcel Property ('Parcel'), which acts as the project manager for the Beenyup Grove residential estate.  Beenyup Grove is developing in accordance with the approved Doley Road Precinct Local Structure Plan ('LSP'). At completion, Beenyup Grove will comprise nearly 2000 residential lots, a local centre, primary school and an extensive network of public open space. It is a significant component of the Byford urban precinct.  Whilst we note that the amendment does not propose any significant revisions to the Byford Traditional Infrastructure		-
		Revision 8 of Development Contribution Area No. 1 ('DCA1'), Parcel considers that some of the DCP items retained through the Amendment undermine several of the principles for DCPs		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		specified in LPS 3 and the relevant State Planning Policy (SPP 3.6:		
		Development Contributions for Infrastructure), namely:		
		• Need and Nexus – "The need for the infrastructure included in the development contribution plan must be clearly demonstrated (need) and the connection between the development and the demand created should be clearly established (nexus)." This is closely related to the underlying principle that the "beneficiary pays" and that "developers will only fund the infrastructure and facilities reasonable and necessary for the development and to the extent that the infrastructure and facilities are necessary to service the development."		
		Equity – "Development contributions should be levied from all developments within a development contribution area, based on their relative contribution to need."		
		Certainty – "All development contributions should be clearly identified and methods of accounting for escalation agreed upon at the commencement of a development."		
		Consistency – "Development contributions should be applied uniformly across a Development Contribution Area and the methodology for applying contributions should beconsistent." It should be noted that this principle does not fetter the principles of need, nexus and equity.		

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		In Parcel's view, several items fail to meet some or all of the above-mentioned principles and should be reconsidered as DCP items by the Shire. These are discussed below, following some general comments about the DCP as a whole.		
		General Comment – Byford Traditional DCP 1		
		The Byford DCP has been in effect for a number of years, with this Amendment relating to the 8 <sup>th</sup> revision of the DCP. The Shire's assertion that calculations to be made are determined based on the remaining lots, shared proportionally, highlights the significant issue with introducing <i>new</i> DCP items to existing DCPs which have been developed considerably. This results in an inequitable distribution of contributions across the DCP, where some lots have already been delivered prior to the items being included in the DCP.		
		The total cost of contributions per lot within Precinct A of the DCP 1 is now \$16,928.80. This represents an increase of \$2,093.84 from the previous revision of the DCP and follows a consistent trend of costs increasing annually over the lifespan of the DCP. The cumulative impact of increased costs of items in DCP 1, increased value of land per sqm and the inclusion of new items is significant and is impacting affordability.		
		Lots completed and remaining  The advertised DCP has been prepared based on a total of 10,721 residential lots across Precincts A – D assumed to be contributing.	The total number of lots anticipated across the life of the DCP is currently 11,343, which is an increase from the commencement of the DCP as more LSPs come on line and lots are reconciled at each review.	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		The number of lots remaining to contribute to these costs has	Specifically in Area A the total lots currently stands at	
		reduced from the previous total, with lots remaining within Precinct A now stated as 9,369 lots, reduced from the previous iteration's total lots of 9,900 lots.  The increases in costs across the DCP and the variations to the number of contributing lots forecasted to be contributing results in a high degree of uncertainty for developers, with the future contributions due to fund the works difficult to forecast effectively. We urge the Shire to review the items included within the DCP to ensure that items which do not meet the principles of SPP 3.6 are removed and funded from alternate sources to reduce uncertainty and bolster the items included in accordance with the principles of SPP 3.6.	9466, reduced from 9772 in the previous revision. This is primarily due to the impact of Metronet removing developable lots in the Town Centre. The Shire disagrees with the contention that items are included within the DCP that do not meet the principles of SPP 3.6.	
		We note that the DCP items established for the roads to be upgraded do not include provision for the landscaping, irritation or planting of the road reserve areas. The failure to include this key element of the works required within the road reserve in the DCP results in the cost of these works is being absorbed by landowners and developers as they form part of the standard delivery of the road reserve. The landscaping of road reserves not only provides amenity for residents but also contributes to the	The DCP is only able to refund costs where there is a clear need and nexus. Streetscaping is excluded from the DCP because there is no obvious need and nexus. The DCP refunds the scope as detailed, and costs are updated annually in line with market indexation. All costs will be reviewed by an independent QS in advance of the next report revision. All members of MIRG and BIRG review these costs and provide feedback prior to the revision going to council.	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		Shire's strategic objectives of retaining and improving the tree canopy.  We have been advised by our Client that there where works are undertaken by landowners / developers in agreements to prefund DCP infrastructure, the funds collected via the DCP are often insufficient to cover the actual cost upon completion. The costs of landscaping and associated works often form a considerable portion of this cost. To ensure the DCP is operating in an equitable manner, we recommend that the Shire undertake a review of the items included in the DCP and ensure they reflect the agreed market standard road reserve and funds are allocated for these costs accordingly.	The DCP only collects for, and thus only reimburses, gazetted scope items.	
		Drainage Infrastructure Costs  Our Client has reviewed various elements of the DCP cost estimates and identified that they are notably higher than local market rates. The drainage infrastructure, specifically the costs attributed to concrete pipe and subsoil pipe installation are far in excess of Parcel's calculated comparable costs with their discrepancy being some ~40% of the costed works.  Due to this significant cost discrepancy, we urge the Shire to seek an independent review of the cost estimates by a quantity surveyor.	All costs included within the DCP have been prepared by an independent qualified QS and peer reviewed by MIRG and BIRG. Annual indexation is applied in between such reviews.  Where an item is not yet gazetted, a cost estimate may be used as a forecast based on a linear metre rate for similar infrastructure. Once gazetted, full QS costings for any new infrastructure item will be undertaken.  It is the Shire's intention to have all costings reviewed by an independent QS upon gazettal of this new	DCP Report Level Comment – n/a

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
				Necommendation
			Amendment, prior to the associated report revision being published.	
		An upgrade to Orton Road as far east as Soldiers Road is included in the existing DCP, which is sufficient to support traffic volumes and movements originating in the DCP area, including Beenyup Grove. North-south movements into the Byford town centre and beyond are accommodated by other DCP roads such as Doley Road and Warrington Road. As such, for the purposes of the DCP area, it is not necessary for Orton Road to be extended to South Western Highway. If it was, the extension would have been incorporated into the LSP, which extends as far east as Soldiers Road. We believe that the addition of this item at a late stage in the DCP's operation and the proposal to maintain the item in the DCP does not satisfy the principles of certainty or consistency, as it could not reasonably have been predicted or budgeted for by DCP participants and, given the number of lots already created across the DCP area, contributions toward it cannot be applied uniformly. The extension of Orton Road to South Western Highway, facilitating a link between that road and the future Tonkin Highway extension, is shown on the Byford District Centre District Structure Plan ('DSP'), approved in September 2023 and the approved South Metropolitan-Peel Sub-regional Planning Framework. Fulfilment of the proposals of the DSP and Sub-regional Planning Framework would depend on State funding for	This item has been previously justified and endorsed through Amendment 208.  The updated 2025 Byford District Structure Plan identifies the ultimate road structure and specifically accounts for the east west connectivity of Orton Rd between SW Hwy and Tonkin Hwy. The requirements for this connectivity reflects that traffic emanating south of Abernethy Rd and east of Doley road needs to be provided with good connectivity to SW Hwy, in order to secure access into and out of the district centre. Expecting such traffic to utilise Warrington Rd and Turner Rd, based on the reduced connectivity caused by Orton Rd only connecting to Soldiers Rd, is unsafe and exceeds road capacities. This issue was fully addressed, and justified as part of amendment 208 and accepted accordingly by the Minister.	No Modifications Recommended

Submitter	No	Submitter Comments	Officer Comment	Officer
				Recommendation
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		a regional road, a new intersection at South Western Highway (assuming Main Roads agreement for that to be created) and, an at-grade railway crossing.		
		The DSP states that Orton Road is a regional distributor, described as "Roads that are not Primary Distributor, but which link significant destinations and are designed for efficient movement and goods within and beyond regional areas". This statement implies that the need for the Orton Road extension does not arise solely from the DCP area, which is adequately serviced by the existing Orton Road proposal, but rather regional traffic flows, making it unsuitable for inclusion in the DCP in this context.		
		Even if the regional benefit and nexus for need was not an issue, the inclusion of the at-grade railway crossing item would be inconsistent with the principle of certainty. The DCP acknowledges that the works are not yet approved and as such, the timeframe for its provision is uncertain. The retention of this item within the DCP is inconsistent with the Shire's previous position which saw the removal of the at-grade railway crossing for Thomas Road from the DCP, noting it was of greater importance on the regional network.		
		The retention of the item in the DCP against Orton Road represents an inequitable distribution of costs and is not consistent with the Shire's own assessment of the need for the item. As such, its inclusion in the DCP fails when reviewed against the principles of need and nexus, equity, certainty and consistency.		

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		<ul> <li>Indigo Parkway</li> <li>The Indigo Parkway item in the DCP was previously included as a joint project with both Indigo Parkway and Sansimeon Boulevard.</li> <li>We reiterate our previous advice to the Shire that the inclusion of the Indigo Parkway item does not satisfy the need and nexus principle in the context of Beenyup Grove. This route between Thomas Road and Abernethy Road is an internal linkage that is not needed to support the development of the estate. To and from Beenyup Grove, residents are likely to use:</li> <li>Doley Road, Abernethy Road and Kardan Boulevard to access Thomas Road;</li> <li>Warrington Road and Abernethy Road to access the Byford town centre and South Western Highway; and</li> </ul>	The need for Indigo Parkway and Sansimeon Boulevard has been consistently identified in both the 2008 and 2025 District Structure Plans as critical to supporting the urbanisation of Byford. Precinct A is uniquely constrained by the railway to the east, Tonkin Highway to the north and west, and Beenyup Brook to the south, making internal connectivity essential.  Beenyup Grove has formed part of Precinct A since the inception of the DCP and has relied on infrastructure funded by contributions from earlier developments. As such, it is appropriate and equitable that it continues to contribute toward shared infrastructure that benefits the precinct as a whole.	DCP Report Level Comment – n/a
		<ul> <li>On completion, Tonkin Highway via the proposed Orton Road interchange.</li> <li>As such, the Indigo Parkway route is unlikely to be used by Beenyup Grove residents.</li> <li>The remaining lots which will contribute to funding this item has reduced by 632 lots, whilst the cost per lot in Precinct A has increased by \$179.75 to a total of \$2,077.42 per lot. These cost increases appear to be associated with the additional land now to be acquired to achieve a 30m wide road reserve for the extent of</li> </ul>	Indigo Parkway is a strategic connector between the Byford District Centre, the future station precinct, and the Thomas Road / Tonkin Highway corridor. It also provides necessary network capacity relief to key roads within Precinct A — including several routes that the submitter notes are critical to Beenyup Grove.  The land requirement for Indigo Parkway is unchanged from previous revisions. The increase results from indexation of the land value and	

Submitter N	No	Submitter Comments	Officer Comment	Officer
				Recommendation
		the road where previous DCP's required a 30m wide reservation in sections only. Given the significant increases in costs for this item and the lack of direct benefit to Beenyup Grove residents, we therefore consider that the Shire should reconsider the inclusion of this item in the DCP, as it does not satisfy the DCP principles of need, nexus and equity.	construction cost, plus remaining lots to share the cost reducing as development progresses.	
		'Orton Road District Open Space and REW'  The DSP approved in September 2023 identifies a District Open Space on a site south of Orton Road and east of Doley Road, consistent with the general location of the DOS in the previous DSP. The previous iteration of the DSP indicated the location of recreational space south of Orton Road, which enabled Parcel to prepare at some extent for costs to be levied via the DCP for this infrastructure. The late inclusion of this item in the lifespan of the DCP has resulted in a significant increase in costs across the DCP 1 and increased the total land required to be ceded for the DOS by 38,000sqm.  This increase in costs and land required for the DOS is coupled with a reduction in the total contributing lots for the item. The Shire's Community Infrastructure and Public Open Space Strategy ('CIPOSS') which informed the DCP and CIDCP discusses that District Open Space should be provided at a rate of 1:15,000 to 1:20,000 of the population. The CIPOSS identified that the 'Byford / Oakford' locality (an area which is broadly consistent with the Byford DCP area) is anticipated to reach a catchment	This item has been previously justified and endorsed through Amendment 208.  The demand for additional District Open Space (DOS) within Byford is being driven by a substantial increase in the local youth population associated with recent and forecast urban growth, not by the existing population. Byford's demographic profile is unique in the Perth context — in 2025, 36.3% of residents were aged 14 and under, compared with 19.3% in Greater Perth. This emerging demographic trend is projected to continue, with the number of residents aged 19 and under expected to nearly double from 5,071 in 2021 to over 10,000 by 2036 (Forecast.id).  This surge in youth population is placing increasing pressure on existing sporting facilities, particularly the Briggs Park Recreation Precinct, which is currently unable to accommodate the growing number of clubs and sporting codes seeking access. The shortfall of six senior-sized district ovals is a direct result of planning	No Modifications Recommended

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		population of 35,000 by 2031 at which time, the Strategy notes there would be a requirement for 2 x DOS to be provided. The reduction in the number of lots contributing to this item would therefore appear to indicate that the demand for this area is not solely generated by the DCP area and would require contributions on behalf of existing population in the DCP.  We note that this item is detailed in both the Byford Traditional Infrastructure DCP 1 and the Community Infrastructure DCP, which together require each lot within Precinct A to contribute  \$2,135.09 for this item alone.	assumptions from 2004 being overtaken by significantly higher densities delivered through local structure planning and subdivision approvals.  The provision of additional DOS through the DCP directly responds to this growth and aligns with the need and nexus principle under SPP 3.6. While CIPOSS identifies the long-term strategic need for two DOS facilities within the broader Byford/Oakford area, the DCP item reflects infrastructure demand arising from new development within the DCP boundary — not from the pre-existing population. The contributing lot base is aligned to this defined catchment, and the DCP fairly apportions costs based on the projected demand from new dwellings.	
		The proposed inclusion of costs related to the 'REW Enhancement' component of the DOS is not a cost that is suitable for funding via a DCP. Whilst Parcel supports a positive environmental outcome for Cardup Brook Resource Enhancement Wetland (REW) in principle, the need for the rehabilitation works is not generated by the Byford urban precinct and their cost should be met through alternative sources of funding. If the REW is, as is suggested in the Amendment, a "regionally valuable ecological and environmentally-sensitive corridor", it would be appropriate for the Shire to fund the rehabilitation work, potentially with State or Commonwealth assistance.	This item has been previously justified and endorsed through Amendment 208.  The enhancement of the Cardup Brook foreshore open space has been previously justified and endorsed through Amendment 208 and the revised District Structure Plan. This area has been identified not only for its environmental value, but also for its role as a publicly accessible District Open Space (DOS) within the urban fabric of Byford.	No Modifications Recommended

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		The inclusion of rehabilitation works in a DCP is clearly addressed in SPP 3.6, which confirms that wetland management, specifically rehabilitation works are not appropriate for inclusion in a DCP. This is especially the case where the works included are solely related to rehabilitation and not management or maintenance of the area. As such, the inclusion of the item within the DCP is inconsistent with the provisions and intent of the SPP 3.6 and should be reconsidered.	Under State Planning Policy 3.6 – Infrastructure Contributions, local governments may include the costs of public open space improvements in a DCP where there is a clear nexus between development and the need for infrastructure. In this case, the foreshore land is being ceded as part of the urban development process and will function as a key open space asset for a growing population. The enhancement works proposed are not general rehabilitation of an existing natural area, but infrastructure upgrades—such as access paths, revegetation for erosion control, fencing, and safety measures—that enable the area to safely function as usable public open space.	
			While SPP 3.6 notes that environmental rehabilitation works in isolation are not typically eligible for inclusion, it does not preclude the inclusion of foreshore upgrades where the land forms part of the public open space network and is being developed to meet the recreational and environmental needs of new residents. This is consistent with both the intent and application of DCPs across other growth local governments.	
			Given that the demand for safe and functional public access is generated by new urban development, and that the works are being delivered in conjunction with	

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		Community Infrastructure Development Contribution Plan (CIDCP) – Advertised draft Revision 4  In accordance with Part 5, Clause 36A (3)(b) of the Shire of Serpentine-Jarrahdale's Local Planning Scheme No. 3, the local government is required to undertake an annual review of the contribution costs for items within CIDCP. To inform such a review, the remaining lots that are contributing to the item should be reviewed as this confirms the total value of contributions to be paid.  Of note is the apparent blanket calculation undertaken in 2021 for the preparation of the CIDCP to determine the Shire's contribution required based on the existing resident population,	the subdivision process, it is appropriate and reasonable that the DCP contributes to the delivery of these improvements.  At the commencement of the CIDCP, the Shire undertook a comprehensive analysis of the Byford and Mundijong areas. This involved comparing the number of existing dwellings/lots to the forecast lot yield to 2036 in each locality. Data was sourced from Forecast ID and cross-checked against Department of Education population growth projections. Based on this assessment, a Shire Share was calculated and fixed for each area — 11% in Mundijong and 47% in Byford — to be applied consistently over the life of the DCP.  The DCP is founded on the 'user pays' principle, with costs equitably distributed across all applicable	No Modifications Recommended
		resulting in a requirement for the Shire to pay 47% of the total costs. This calculation has been applied across the CIDCP area and does not appear to have been reviewed against actual population data.	development expected within the DCP timeframe. Adjusting the Shire and developer shares annually based on actual population changes would undermine this principle by shifting the cost burden midstream.	
		Discussed in further detail below, we have significant concerns with the cost apportionment for items in the CIDCP does not accurately reflect the existing population and by association, the contribution due to be paid by the Shire. We strongly urge the Shire to undertake an assessment of the actual existing population and forecast contributing lots. This assessment detail is essential	The adopted methodology ensures certainty, fairness, and administrative simplicity for all stakeholders over the duration of the plan.	

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		to confirm that the costs are being distributed equitably and are consistent with the principle of user pays.  **Byford Library and Multi-Agency Centre**  We note that the CIDCP includes an item to develop the Byford Library and Multi-Agency Centre. Appendix A sets out the need and nexus for the library and refers to a study undertaken by the Shire in 2015/16 which identified an "existing and immediate demand" for the library. The stated demand for the library, some 5 years prior to the commencement of the CIDCP is in itself, grounds for a review of the forecast and actual existing population demand to confirm the cost apportionment is correct. The CIDCP currently requires the Shire to contribute 47% of the cost, with 53% to be paid by developers within the Byford CIDCP area. This calculation methodology is the standard rate applied across items in the CIDCP in the Byford precinct and does not appear to reflect a true assessment of the Shire's contribution due on behalf of the existing community. The inclusion of this	The Shire's 47% contribution toward the Byford Library and Multi-Agency Centre is based on the existing population at the time the CIDCP commenced in 2021, not at the time of the 2015/16 needs analysis. While earlier studies identified a future need, no capital funding or delivery occurred until after the DCP was in place.  The Mundijong library provided interim services, but did not meet long-term needs for the Byford community. The cost apportionment follows a consistent methodology applied across all CIDCP items and aligns with the principles of SPP 3.6, ensuring costs are shared equitably between existing and future residents.	No Modifications Recommended
		item in the CIDCP and the calculation methodology provided is inconsistent with the principes of SPP 3.6 as it fails to demonstrate the need and nexus of the costs. As such, we strongly urge the Shire to reconsider the costs to be levied against landowners and the inclusion of this item more broadly.  Shire Internal Costs  We note that the CIDCP proposes a line item within each infrastructure item included, proposing to recoup the Shire's	The Shire recognises that project management costs are an essential component of infrastructure delivery, particularly where delivery is undertaken directly by	No Modifications Recommended

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		internal, project management costs for projects where the Shire is delivering the works in lieu of a landowner or developer. The CIDCP proposes the Shire's costs for these services to be 18% of the sub-total value of the CIDCP item.  We are concerned that this estimated cost is based only on recent examples of the Shire's non- DCP project examples and does not appear to reflect an estimated cost or quote provided for these works specifically. Further, the estimated cost for these services is significantly higher than industry standards. We have been advised by our Client that equivalent project management tasksare generally undertaken by civil engineering firms, which provide design and superintendency services charged at between 6-9% of the costs, significantly lower than the estimated 18% as proposed in the CIDCP.  The inclusion of this as a standard line-item in the CIDCP is at best, premature and unsubstantiated. It is unclear to which infrastructure items this contribution would apply to. We consider the estimated cost of the works to be significantly higher than the market average, which if applied would result in a significant increase in the contributions to be paid by developers. Given the impact of costs associated this item, we request that the item be reconsidered or supporting evidence be provided to confirm these costs are accurate.	the Shire rather than via developer pre-funding. Historically, a line item titled "Costs associated with Design and Management" has been included in DCP projects to capture this. However, the costing for this line has not previously incorporated internal Shire costs incurred during Shire-led delivery. Moving forward, the term "Shire Internal Costs" has been added for transparency and included in the cost estimates where applicable.  These costs, based on recent modelling for non-DCP projects, are estimated to average around 15% (revised from earlier advice of 18%) of the total project cost. This is not intended as an industry benchmark, but rather a reasonable forecast based on observed historical data for similar infrastructure projects managed by the Shire. It is acknowledged that developers delivering infrastructure directly are not subject to the same governance framework and typically use preferred suppliers without formal tendering, which results in lower overheads. The increase above typical developer project management costs (commonly 7–10%) reflects:  • Mandatory compliance with the Local Government Act, including public tender processes for both design and construction.	

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			<ul> <li>Officer time spent on procurement governance, tender evaluation, and contract management, often supplemented by consultants for high value tenders.</li> <li>Additional oversight and reporting processes inherent in public sector delivery.</li> <li>Importantly, these internal costs:         <ul> <li>Do not duplicate general DCP administration costs whereby a proportion of overhead cost for key employees reflects the anticipated time to be spent on the general running of the DCPs. Additionally, staff involved in specific DCP projects will record that time via project-based timesheets to separate project work from the general administration pool, thus avoiding double counting.</li> <li>Will be reconciled to actuals at the time of delivery. The 18% represents a planning estimate only and will be superseded by actual internal costs when available.</li> </ul> </li> </ul>	
			While most traditional DCP infrastructure is developer-delivered, this scope item is included across all projects as it is not always possible to identify in advance which projects (or portions thereof) may be Shire-delivered. The application of this cost to	

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			<ul> <li>individual infrastructure items will be assessed at each Annual Report Review to reflect the best available information at that time, and only applied to the section/value of the project the Shire is delivering. This allows for consistent treatment and ensures cost recovery is available if required, without impacting developer-delivered projects.</li> <li>This approach is considered appropriate for inclusion within the DCPs under the following principles:         <ul> <li>Transparency: We have included this as a distinct cost category, which will be supported by time-based cost tracking to meet the principles of accountability and equity.</li> <li>Actuals reconciliation: Using actual costs rather than fixed estimates aligns with the requirement for costs to be reasonable and reflective of the actual cost of infrastructure.</li> </ul> </li> <li>The anticipated 15% on-cost is provided as a guideline only and the actual percentage applied within the cost schedules will be confirmed at each DCP Report revision, where those costs will be subject to review by MIRG and BIRG. The Amendment requests only the inclusion of the line item as an applicable cost.</li> </ul>	
		CONCLUSION		-

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		In summary, Parcel are of the opinion that the proposed Byford DCP and the Community Infrastructure DCP will have a significant and direct impact on housing affordability and land supply within the Shire of Serpentine-Jarrahdale. The addition and extension of several DCP items so late in the operation of this DCP is inequitable and does not satisfy the principles of certainty or consistency. The changes could not reasonably have been predicted or budgeted for and the uniform application of costs across the DCP area will be impossible, given the significant number of lots already created.		
		Further, some of the items do not satisfy the principles that the beneficiary pays and of need and nexus, which brings into question their suitability for inclusion in the DCP. The Shire risks discouraging investment and continued growth and development of the Byford area by proposing the majority of costs are paid solely by the landowners.		
		We respectfully request that the Shire reconsider the items mentioned in this letter and recommend that the WAPC make modifications to the amendment before it is presented to the Minister for Planning for determination. We appreciate the City's invitation to comment on this Amendment and would welcome any opportunity to provide further input into the assessment process.		

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	1	One down of Boulevand and Clarking Boulevands		
Shire of Serpentine Jarrahdale Andrew Trosic, 6 Paterson St, Mundijong WA 6123		Goodwood Boulevard and Skyline Boulevard:  Goodwood Boulevard (formerly "Whitby New Road") is currently identified in the DCP between Taylor Road and South Western Highway. The western connection is reliant on an at-grade rail crossing west of Soldiers Road, for which delivery timing remains uncertain and may extend beyond the lifespan of the DCP.  Recent advice from Main Roads WA indicates that the proposed eastern connection to South Western Highway will require longer-than-anticipated acceleration and deceleration lanes due to the design speed. These requirements, combined with the need for further detailed planning and interagency consultation, present significant uncertainty in terms of cost, timing, and feasibility within the current DCP timeframe.		Schedule of modifications #7
		The anticipated changes to the intersection design, road geometry, and associated land acquisition will increase the overall DCP costs beyond those currently included, though within the current gazetted scope.  As a result of the planning constraints, the connection is unlikely to		
		be delivered within the DCP horizon and cannot reliably function as a strategic east-west link or emergency escape route for the Whitby Estate in the short to medium term.		
		In response, the developer has shifted focus to a north-south movement strategy within the estate. This prioritises the extension of Skyline Boulevard to Norman Road, as reflected in the <i>Mundijong District Structure Plan (2023)</i> . The extension will provide improved connectivity and emergency access for the Whitby community and is considered the more deliverable and effective strategic route.		

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		The Developer's own submission in respect of the scope change for Skyline Boulevard is contained within this document as reference #11.		
		Following consultation with the developer and a preliminary cost impact assessment, it is recommended that the eastern extent of Goodwood Boulevard be reduced by approximately 700 metres (the extent of the currently approved subdivision in that area), omitting the intersection with South Western Highway and associated upgrades at this time. The funds associated with this section are proposed to be reallocated to support the delivery of the Skyline Boulevard extension. This adjustment is expected to be approximately costneutral to the DCP and will enable critical infrastructure to proceed without increasing per-lot contribution rates.		
		Although this modification was not explicitly included in the advertised version of Amendment 7, both infrastructure items are already included in the existing DCP, and the proposed changes relate to scope adjustments rather than new inclusions. In accordance with Regulation 46(1) of the Planning and Development (Local Planning Schemes) Regulations 2015, the Minister may approve modifications not advertised where satisfied that further advertising is unnecessary. In this case, letters of support have been sought from relevant stakeholders (MIRG), to demonstrate broad industry agreement.		
		Importantly, this change does not preclude a future amendment to reintroduce the omitted section of Goodwood Boulevard, should feasibility and network requirements change. However, based on current planning advice and delivery risks, its inclusion is not recommended at this time, or until such time that the inclusion would maintain an acceptable per lot contribution value.		