

NEW SUMMARY OF SUBMISSIONS
Byford District Structure Plan
PA18/777

Responsible Business Unit: Strategic Planning

Advertising Date: 21 May 2020 to 31 August 2020

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
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Government Agencies

Water Corporation IN20/17281	1.	The proposed amendments to the Byford DSP and the associated DCP (Amendment 208) do not appear to impact on, or require changes to the Water Corporation's long term planning for water, sewerage and drainage for the Byford area. The Corporation has no objections to these changes.	The submission has been considered and the contents noted. The portion of the submission that pertains to the Mundijong District structure plan is addressed in that Schedule of submissions.	No modifications required to the Structure plan.
Department of Fire and Emergency Services IN20/18353	2.	<p>We acknowledge that the Structure Plan Report states that <i>a high level bushfire hazard level assessment should be undertaken.</i></p> <p>It is unclear from the documentation provided if the Shire of Serpentine - Jarrahdale (Shire) has applied <i>State Planning Policy 3.7 – Planning in Bushfire Prone Areas</i> (SPP 3.7) to this proposal.</p> <p>Given the Byford District Structure Plan seeks to rationalise the spatial extent of precincts within the subject site, the structure plan provides an opportune mechanism for the coordination of bushfire risk to ensure that it does not result in the introduction or intensification of development or land use in an area that has or will, on completion, have an extreme BHL and/or BAL-40 or BAL-FZ.</p>	<p>The submission has been considered and the contents noted.</p> <p>Bushfire hazard level assessment should be undertaken at Local Structure Planning stage (as is currently being done) to ensure that development does not result in the introduction or intensification of development or land use in an area that has or will,</p>	No modifications required to the Structure plan.

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		<p>SPP 3.7 seeks to reduce vulnerability to bushfire through the identification and consideration of bushfire risks in decision-making at all stages of the planning and development process.</p> <p>A Bushfire Management Plan (BMP) is required to accompany strategic planning proposals, subdivision and development applications in areas above BAL-LOW or areas with a bushfire hazard level above low (refer to clause 6.2b). A BMP includes the bushfire assessment, identification of the bushfire hazard issues arising from the relevant assessment and a clear demonstration that compliance with the bushfire protection criteria contained within Appendix 4 of these Guidelines, is or can be achieved.</p> <p>The BMP should be prepared as early as possible in the planning process and progressively refined or reviewed as the level of detail increases. The level of detail provided within a BMP should be commensurate with the applicable planning stage and scale of the proposal or application.</p> <p>Should you apply SPP 3.7 then, we request the relevant information pursuant to this policy be forwarded to DFES to allow us to review and provide comment prior to the Shire endorsement of the Byford District Structure Plan.</p> <p>Land Use Planning staff are available to discuss planning proposals and provide general bushfire advice at any stage of the planning process. Please do not hesitate to contact me on the number below, should you require clarification of any of the matters raised.</p>	<p>on completion, have an extreme BHL and/or BAL-40 or BAL-FZ.</p>	

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Department of Transport IN20/18605	3.	<p>The Department of Transport has review the submitted documents and provide the following comments.</p> <ul style="list-style-type: none"> • The submitted TIA indicated that there are traffic issues within the DSP area. The Department recommend that the shire resolve traffic issues prior to finalisation of the DSP which include allocating sufficient safe crossing point and identifying appropriate location for these crossing. • The Department recommend the DSP take the endorsed Long Term Cycling Network (LTCN) plan into consideration when determining the cycling network. <p>Thank you for the opportunity to provide comments for the above development application. Should you wish to follow up on any of these matters</p>	<p>The submission has been considered and the contents noted.</p> <p>The traffic network provides a framework that allows for the current and future traffic and cycling networks to be safe and integrated with the surrounding areas.</p> <p>The matters raised will be assessed at Local Structure Planning stage (as is currently being done) to ensure that development does not result in traffic management issues.</p> <p>The Long Term Cycling Network (LTCN) plan will be taken into consideration when determining the cycling network.</p>	<p>No modifications required to the Structure plan.</p>

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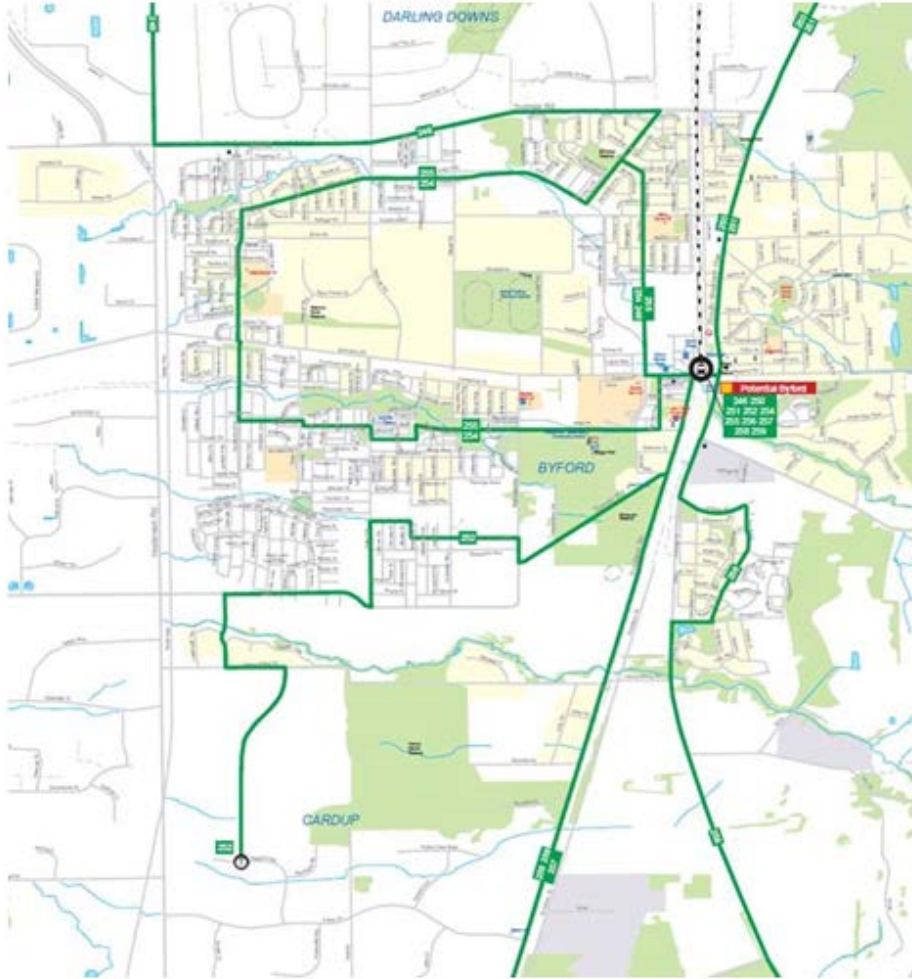
Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
Public Transport Authority IN20/18802	4.	<p>Thank you for providing the opportunity to review and provide comment on the Proposed Byford District Structure Plan and Scheme Amendment No.208. The Public Transport Authority (PTA) has reviewed the draft scheme and wishes to provide the following comments:</p> <ul style="list-style-type: none"> • <i>a) Page 90, Section 3.4.1 Public Transport</i> – The PTA notes the Shire’s aspiration to accommodate a potential Bus Rapid Transit (BRT) system in the future. The implementation of a BRT system will be dependent on a number of land-use factors, patronage demand and population growth in the area. The PTA is continuing its optioneering and planning analysis with the METRONET project team to investigate the potential opportunity for a BRT. • <i>b) Page 91, Figure 22</i> - the proposed network shown under Figure 22 is incorrect. Please find below the latest map on the proposed bus network serving the Byford Town Centre. Please note this is a proposed network and the routes are indicative. Final routes will be mapped and depicted once funding is received. Please replace Figure 22 with the map below. • <i>c) The METRONET project team will provide a response separately on all aspects related to the Byford Station precinct.</i> 	<p>The submission has been considered and the contents noted.</p> <p>a) The rapid advancement of planning for the Metronet Byford train station and the impact of this on the BRT is acknowledged.</p> <p>b) The map will be updated.</p> <p>c) Noted.</p>	<p>a. That the current bus network for Byford be updated to reflect the submission. Update Figure 22: Proposed Public and Active Transport Network to reflect the latest map on the proposed bus network.</p>

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		 <p>The map displays the Byford District Structure Plan area, including the regions of Darling Downs, Byford, and Cardup. A green boundary outlines the district's extent. A red box labeled 'Potential by-lots' is located near the center-right of the map, with a list of lot numbers: 248, 250, 251, 252, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.</p>		
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Department of Education IN20/19632	5.	<p>Thank you for taking the time to consider PTA's response.</p> <p>Proposed Byford District Structure Plan and Development Contribution Plan</p> <p>Thank you for your letter dated 20 May 2020 providing the Department of Education (Department) with the opportunity to comment on the Shire of Serpentine Jarrahdale's (Shire) draft Byford District Structure Plan (DSP) and draft Development Contribution Plan (DCP). The Department has reviewed the relevant information in support of the draft documents and wishes to provide the following comments:</p> <p><u>District Structure Plan</u></p> <p>1. Section 1.3.2 of Part 2 of the DSP identifies the relevant State and Regional Planning Frameworks that were considered in the preparation of the document. The DSP states that the provisions of Western Australian Planning Commission's (WAPC) Development Control Policy 2.4 – School Sites (DC 2.4) were considered in the preparation of the DSP map which identifies the location and number for new schools.</p> <p>Notwithstanding this, the DSP map only identifies a total of nine public primary schools and two public high schools to service the projected 20,780 dwellings. This equates to approximately 2,309 dwellings per primary school site which significantly exceeds the prescribed rate of 1500-1800 dwellings per primary school site.</p> <p>It is worth noting that the Draft Operational Policy 2.4 – Planning for School Sites (OP 2.4) which will supersede the DC 2.4 is currently being advertised and therefore due consideration needs to be given to the proposed provisions contained in the draft OP 2.4 including the rate of 1500 dwellings per primary school site. Accordingly, the projected dwelling yield would generate the need for at least 13 public primary schools and two to three public high schools.</p> <p>It is important to note that there is a correlation between the number of residential lots and the need for public school sites. Preliminary analysis indicates that there is a higher than expected residential growth in the Byford locality, beyond what was originally anticipated in the approved structure plans. Therefore, it is essential that the number and size of public schools correspond to the student enrolment demand so that it will not adversely impact on the quality of the educational outcome and the orderly and proper planning of the locality.</p>	<p>The submission has been considered and the contents noted.</p> <p>1. Officers acknowledge that the current residential densities are substantially higher than anticipated when the original Byford District Structure Plan was approved in 2005. Additional areas such as the Hopkinson road precinct recently approved by the Department of Planning, Lands & Heritage have also increased the number of residents requiring a reassessment of the number of schools.</p> <p>2. The location of the future public high school in Byford will be updated</p>	<p>a. That the location of the future public high school in Byford be updated to ensure consistency in Fig 1 and Fig 2. This secondary school site will be indicatively identified on the western side of the Cardup area in conjunction with the Department of Education and the Department of Planning, Lands & Heritage.</p> <p>b. That all references in this regard be changed from "Joint Use Agreements" (JUA) to "Shared Use Agreements" (SUA).</p>

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		<p>2. The DSP contains a discrepancy between the location of the future public high school on Figure 1 (Byford DSP Map) and Figure 2 (Proposed Community Infrastructure and Open Space Network). Figure 1 identifies the future public high school site to the east of South Western Highway, while Figure 25 indicates that it will be located within Cardup. Figure 2 also removes the location of the proposed primary school site to the east of South Western Highway. All figures should be reviewed to ensure constancy throughout the entire document.</p> <p>As the City may be aware, the Byford Secondary College will be under student accommodation pressure in the short term future. As such, the Department is undertaking a separate review of the provision of an additional public secondary school site within the Byford locality having regard to the viability of future student catchment areas, the number of contributing public primary schools and anticipated residential growth in Byford and surrounding areas including Cardup which was recently approved as Urban zone under the Metropolitan Region Scheme.</p> <p>Initial analysis suggests that the southern portion of the Byford District Structure Plan and possibly, Cardup to be the preferred location for a public secondary school site. The Department does not support the proposed secondary school site to the east of South Western Highway due to the limited residential growth and contributing public primary schools in the subject locality.</p> <p>3. Subject to the above matters being resolved, the Department must also ensure that future public school sites are not burdened by physical or environmental constraints that would prevent an identified public school site being delivered in the future. Site elements such as topography, wetlands, infrastructure and utility easements, cultural and heritage significance, flora and fauna, environmental buffers, bush fire prone areas and other impediments shall be considered as part of the due diligence assessment when selecting school sites.</p> <p>The Department acknowledges that such matters will be addressed through the future local structure planning stages. Structure plans should address the relevant design requirements of DC 2.4, Liveable Neighbourhoods and draft OP 2.4 and be accompanied by technical appendices which demonstrate the site is suitable for its intended development.</p>	<p>to ensure consistency. Officers note the review currently being undertaken by the Department of Education.</p> <p>3. Officers acknowledge the new State Operational Policy 2.4 and have submitted a response to the Department of Planning, Lands & Heritage in this regard.</p> <p>4. The Shire is still of the opinion that a Shared Use Agreement between the Shire and the Byford Secondary School should be negotiated as contemplated since the discussions regarding the design of the school.</p>	

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Department of Biodiversity, Conservation and Attractions IN20/19594	6.	<p>The department notes that the District Structure Plan requires that Local Structure Plans prepared within the Byford District Structure Plan area will need to be accompanied by,</p> <ul style="list-style-type: none"> • an Environmental Assessment Report that addresses the management of Threatened Species and Communities, Conservation Category and Resource Enhancement Category Wetlands, interface with Bushforever sites, buffers and detailed flora and fauna surveys, • a Local Water Management Strategy, and • a Bushfire Hazard Assessment and/or a Bushfire Management Plan. <p>It is further noted that the following provisions will apply to all Local Structure Plans, subdivisions, and development across the Byford District Structure Plan,</p> <ul style="list-style-type: none"> • acknowledge and allow for appropriate interface with Bushforever sites and other sites of environmental significance, • protect and enhance significant ecological areas and their buffers, including those with ecological linkages values along railways, roads and highways. <p>The proposals to upgrade Abernethy Road and Thomas Road will require future detailed environmental assessment and approvals to ensure that the level of environmental impact is acceptable and managed.</p>	<p>The submission has been considered and the contents noted.</p> <p>a) The Shire will continue to provide and require the information needed by the Department of Biodiversity, Conservation and Attractions from proponents for assessments to be submitted as per the planning framework.</p>	<p>No modifications required to the Structure plan.</p>

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		<p>It is the department's expectation that the planning system will ensure that there is adequate separation for bushfire protection between future development and bushland reserves and areas of State forest, Bushforever sites, wetlands, and areas supporting threatened species and communities and conservation significant vegetation, and that all bush fire protection requirements are provided within the development land and do not place reliance or impositions on the management of the natural areas.</p> <p>The department supports having a perimeter road between development and conservation reserves, State forest, and areas of conservation significance, for reasons of public safety, protection of bushland and fire safety for residents.</p> <p>It is the department's expectation that the Department of Water and Environmental Regulation and the Shire of Serpentine and Jarrahdale will ensure that the Local Water Management Strategies and Urban Water Management Plans will consider the ecological water requirements of wetlands and water dependent threatened species and communities, and will maintain the pre-development hydrology of these sites.</p> <p>It is also the department's expectation that fauna management issues, including the displacement of kangaroos will also be considered and addressed at the local structure planning stage.</p>		
Department of Water and Environmental Regulation	7.	The Department of Water and Environmental Regulation (Department) supports the development of the district structure plan and scheme	The submission has been considered and the contents noted.	a. That references to the Government Sewerage Policy

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IN20/19561		<p>amendment as an important overarching planning document that guides future planning and development within the subject area.</p> <p>It is noted there may be challenges securing non potable supply for irrigation within the structure plan area in the future due to reducing groundwater allocations and unfavourable conditions for abstraction.</p> <p>Attachment 1 contains the Department’s comments for your consideration, and some recommendations upon addressing issues pertaining to non-potable supply.</p> <p>a) State and Regional Planning Framework - Government Sewerage Policy - This policy has been finalised and is no longer in draft form. Please update reference.</p> <table border="1" data-bbox="526 906 1487 1034"> <thead> <tr> <th>Page/Section</th> <th>Topic</th> <th>Issue</th> <th>Suggested changes</th> </tr> </thead> <tbody> <tr> <td>Pg 42, section 1.3.2</td> <td>State and Regional Planning Framework</td> <td>Government Sewerage Policy</td> <td>This policy has been finalised and is no longer in draft form. Please update references to the policy.</td> </tr> <tr> <td colspan="4">Comments continued on next page...</td> </tr> </tbody> </table> <p>b) Natural Resources – Groundwater</p>	Page/Section	Topic	Issue	Suggested changes	Pg 42, section 1.3.2	State and Regional Planning Framework	Government Sewerage Policy	This policy has been finalised and is no longer in draft form. Please update references to the policy.	Comments continued on next page...				<p>a) Officers note the status of the “Draft” Government Sewerage Policy.</p> <p>b) Officers note the comments on the Integrated Water Management Strategy and groundwater.</p> <p>c) The Department of Water and Environmental Regulation comment on the Shire of Serpentine-Jarrahdale Integrated Water Management Strategy is noted and will be included in further deliberation and studies in this regard.</p>	<p>remove the “Draft” and reflect its current status.</p> <p>b. That the challenges of the availability of groundwater for the future irrigation of land be added to section 2.2.8.</p> <p>c. That the importance of “garden bores” be removed and replaced with the impact of “bores for irrigation of open space and playing fields”, in relation to reducing groundwater levels.</p>
Page/Section	Topic	Issue	Suggested changes													
Pg 42, section 1.3.2	State and Regional Planning Framework	Government Sewerage Policy	This policy has been finalised and is no longer in draft form. Please update references to the policy.													
Comments continued on next page...																

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		<table border="1"> <tr> <td data-bbox="519 472 631 1082">Pg 72, section 2.2.8</td> <td data-bbox="631 472 748 1082">Natural Resources – Groundwater</td> <td data-bbox="748 472 1478 1082"> <p>Integrated Water Management Strategy</p> <p>This section discusses non-potable water resources (groundwater) and states that the Shire is currently undertaking an Integrated Water Management Strategy (IWMS) to investigate water recycling and reuse for irrigation purposes. The Department previously reviewed and provided comments on the IWMS to the Shire dated 8 October 2019 (see attached memo). Advice pertaining to the optimisation of existing groundwater usage through suitably modifying abstraction and supply networks to potentially yield a greater irrigation capacity is considered an important first step.</p> <p>Groundwater Availability</p> <p>It is recommended groundwater availability for future irrigation requirements should be clearly identified as a challenge in this section.</p> <p>Please note, whilst there may appear to be large volumes available in the superficial aquifer, it is limited by the geology of the area and often contains quite clayey sediments close to the Scarp which do not supply groundwater at a rate suitable to enable irrigation (i.e. abstraction is unviable). As a result the deeper aquifers are either at or nearing full allocation. The thickness of the superficial aquifer is also variable depending on the location, ranging from 10 to 50 m below ground surface.</p> <p>The Leederville aquifer can also be thin and unsuitable in certain locations close to the Scarp. Water level decline is also occurring in this aquifer.</p> <p>The Cattamarra Coal Measures aquifer is not present over the entirety of the district structure plan area, residing between the Darling Scarp and the Serpentine Fault. Water level decline is also being experienced due to heavy local and regional abstraction as well as reduced rainfall.</p> <p>Please note, groundwater allocation limits are currently being reviewed in this area, which may limit availability in some areas. It is recommended this is identified within this section.</p> </td> </tr> </table>	Pg 72, section 2.2.8	Natural Resources – Groundwater	<p>Integrated Water Management Strategy</p> <p>This section discusses non-potable water resources (groundwater) and states that the Shire is currently undertaking an Integrated Water Management Strategy (IWMS) to investigate water recycling and reuse for irrigation purposes. The Department previously reviewed and provided comments on the IWMS to the Shire dated 8 October 2019 (see attached memo). Advice pertaining to the optimisation of existing groundwater usage through suitably modifying abstraction and supply networks to potentially yield a greater irrigation capacity is considered an important first step.</p> <p>Groundwater Availability</p> <p>It is recommended groundwater availability for future irrigation requirements should be clearly identified as a challenge in this section.</p> <p>Please note, whilst there may appear to be large volumes available in the superficial aquifer, it is limited by the geology of the area and often contains quite clayey sediments close to the Scarp which do not supply groundwater at a rate suitable to enable irrigation (i.e. abstraction is unviable). As a result the deeper aquifers are either at or nearing full allocation. The thickness of the superficial aquifer is also variable depending on the location, ranging from 10 to 50 m below ground surface.</p> <p>The Leederville aquifer can also be thin and unsuitable in certain locations close to the Scarp. Water level decline is also occurring in this aquifer.</p> <p>The Cattamarra Coal Measures aquifer is not present over the entirety of the district structure plan area, residing between the Darling Scarp and the Serpentine Fault. Water level decline is also being experienced due to heavy local and regional abstraction as well as reduced rainfall.</p> <p>Please note, groundwater allocation limits are currently being reviewed in this area, which may limit availability in some areas. It is recommended this is identified within this section.</p>	Due regard to this information and modification to the relevant section.	
Pg 72, section 2.2.8	Natural Resources – Groundwater	<p>Integrated Water Management Strategy</p> <p>This section discusses non-potable water resources (groundwater) and states that the Shire is currently undertaking an Integrated Water Management Strategy (IWMS) to investigate water recycling and reuse for irrigation purposes. The Department previously reviewed and provided comments on the IWMS to the Shire dated 8 October 2019 (see attached memo). Advice pertaining to the optimisation of existing groundwater usage through suitably modifying abstraction and supply networks to potentially yield a greater irrigation capacity is considered an important first step.</p> <p>Groundwater Availability</p> <p>It is recommended groundwater availability for future irrigation requirements should be clearly identified as a challenge in this section.</p> <p>Please note, whilst there may appear to be large volumes available in the superficial aquifer, it is limited by the geology of the area and often contains quite clayey sediments close to the Scarp which do not supply groundwater at a rate suitable to enable irrigation (i.e. abstraction is unviable). As a result the deeper aquifers are either at or nearing full allocation. The thickness of the superficial aquifer is also variable depending on the location, ranging from 10 to 50 m below ground surface.</p> <p>The Leederville aquifer can also be thin and unsuitable in certain locations close to the Scarp. Water level decline is also occurring in this aquifer.</p> <p>The Cattamarra Coal Measures aquifer is not present over the entirety of the district structure plan area, residing between the Darling Scarp and the Serpentine Fault. Water level decline is also being experienced due to heavy local and regional abstraction as well as reduced rainfall.</p> <p>Please note, groundwater allocation limits are currently being reviewed in this area, which may limit availability in some areas. It is recommended this is identified within this section.</p>					

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Page/Section	Topic	Issue	Suggested changes
		<p>Recommended Next Steps</p> <p>As previously identified strategic consolidation of existing groundwater use to better service current and future irrigation needs is recommended as an important first step towards security of non-potable supply. This should include, but not be limited to:</p> <ul style="list-style-type: none"> • Cross reference existing Shire licences with expected water requirements to determine initial shortfall; • Interrogate Shire drawpoints and irrigation networks, and cross reference with developer licenses which will eventually be transferred to the Shire to optimise ultimate configuration; • Design or modification approach to POS to identify areas which can have reduced or no irrigation (hydro-zoning) to prioritise groundwater allocations to active turfed areas. <p>Licences currently held by developers for maintenance of open space and playing fields (including schools) will have previously determined volumes for associated uses, which are to be transferred to the relevant authority (Shire or school) upon handover.</p> <p>General</p> <p>Please amend reference to <i>Department of Water</i> to <i>Department of Water and Environmental Regulation</i>. Also please note groundwater abstraction is regulated by the Department under the <i>Rights in Water Irrigations Act 1914</i>.</p> <p>The reference "Groundwater levels can be reduced should garden bores be established", though not incorrect, bores for irrigation of open space and playing fields yield a higher impact and are more relevant to the district structure plan.</p>	
<p>Memorandum</p> <p>DATE: 8 October 2019</p> <p>RE: Shire of Serpentine-Jarrahdale Integrated Water Management Strategy</p> <p>Thank you for the opportunity to provide comment on the <i>Shire of Serpentine-Jarrahdale Integrated Water Management Strategy (WGA, 2019)</i>. Efforts by the Shire to proactively plan for future water use requirements and supply</p>			

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		<p>options to service future land development and community assets are commendable, and we look forward to working with you further upon this project.</p> <p>This report has been reviewed by a number of internal Department branches and as such the following advice is provided for your consideration.</p> <p>Surface Water Supply Yields</p> <p>It is acknowledged this paper is a pre-feasibility high level report, for which it is intended that future qualifying studies would determine actual viability of water supply options. Notwithstanding, the Department would advise initial supply estimations for surface water harvest options may be potentially overestimated due to the following.</p> <p><i>Climate Change</i></p> <p>At this point it is not clear to what extent climate change has been factored into the analysis. It is understood some of the Departments modelling reports have been utilised and if so future dry climate scenarios should inform this work. There is risk in yield estimations not considering this issue. This should be also identified within future work required if not already done so.</p> <p><i>Ecological Water Requirements</i></p> <p>The estimates at this point assume a range of harvest volumes from a number of drains and brooks around the Shire. The paper has not identified the need determine ecological water requirements of these systems to determine a sustainable yield of take. The brooks will support ecological values for which direct impact would need to be considered. Though drains</p>		

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		<p>mostly do not support such values, it would be important to consider impact to receiving water bodies downstream, such as the Serpentine River. Ecological water requirements have potential to significantly reduce the available take from water courses, hence this issue should either be conservatively considered within this paper or identified as future work required.</p> <p>Groundwater</p> <p><i>Optimisation of Existing Resources</i></p> <p>It is recognised the long range bulk supply options being investigated as part of this Integrated Water Supply Strategy. However, the optimisation of existing groundwater resources may be an area for future work to identify current usage, and suitably modify abstraction and supply networks to achieve an optimised configuration which may yield a greater irrigation capacity.</p> <p><i>Future Resource Opportunities</i></p> <p>There is potential for broad future land use change scenarios to identify where groundwater may come available into the future. Furthermore, the IWSS (or future document) could make reference to principles of future urban form and water sensitive urban design outcomes that would balance irrigation needs.</p> <p>Specific Section Comments</p> <ul style="list-style-type: none"> • Water supply Option 1: <ul style="list-style-type: none"> o It is not clear whether adopted rates have utilised the results of the Lower Serpentine hydrological studies: Land development, drainage and climate scenario (DoW, 2015) report which discusses the reduction in flows which 		

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		<p>can be expected with reduced rainfall. The report indicates future medium and dry scenarios show a significant reductions in flow through all parts of the flow curve, with fewer medium and high flow events in winter. Future climate scenarios have been investigated further as part of the Department's Peel Integrated Water Initiative which may inform future work.</p> <p>o Surface water flows from Oakland/Birriga Main drain with above ground storage – At the proposed location a 6 m deep facility is likely to be at least 3 m below minimum groundwater levels and therefore accessing superficial groundwater. Evaporation from an 83 ha area will need to be considered.</p> <ul style="list-style-type: none"> • Intersection of groundwater – it should be noted that any options for which infrastructure intersects the watertable, may constitute a take of groundwater that would require licencing under the Rights in Water Irrigation Act 1914. • Section 2.3.4: refers to Managed aquifer recharge in Table 16 however MAR not suggested as part of the overview. • Surplus water not identified a risk: In Option 1, 1a, 2, 4, 6 and 8 future demand in the precincts is much lower than the options supply sizes. This should be considered as risk rather than opportunity. If sufficient demand would not be available from agriculture sector, the assets can't be used in their full capacity especially in the early years of the scheme and cost of water would be much higher than the estimated costs in this report. The report should identify this potential risk and propose demand forecasting as priority future work in Section 6. • Option 5 and Option 9 water cost: These options are similar but the unit cost of water is appears much higher in Option 5. 		

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		<ul style="list-style-type: none"> • <i>Pumping costs</i>: Pumping cost has not been considered for operational cost estimations. It is recommended this is identified. • <i>Figure 1 – Precinct layout and future land use</i>: It is noted in future predictions for water needs there is an area identified as future “intensive agriculture”. It is important that estimated needs have not been based upon conventional inground horticulture, as such land uses contravene Environmental Protection Peel Inlet – Harvey Estuary Policy 1992, State Planning Policy 2.1 – Peel Coastal Plain Catchment and the Shire of Serpentine-Jarrahdale’s Local Planning Policy 4.12: Horticulture. • <i>Wastewater treatment</i>: Options 2, 5, and 9 have considered conventional treatment for the wastewater treatment. If a the necessary land is not secured for the proposed wastewater treatment infrastructure, there may be a need to consider advanced wastewater treatment facilities for these options which require a lesser footprint and reduced buffers compared with conventional processes. It is recommended this is identified in forward program of work for these options. • <i>Decentralised wastewater servicing</i>: The SWOT analyses for decentralised options could also identify the benefits beyond that of a non-potable water resource. Decentralised options could also supply wastewater services to the new developments, with the potential for revenue generated to offset the cost of non-potable water supply to the Shire of Serpentine-Jarrahdale. • <i>Birrega and Oaklands catchments</i>: Please note MikeFlood modelling has been undertaken in 2015 on the Birrega and Oaklands catchments, which may assist this work. • <i>Water supply Option 8</i>: Part of the Peel Integrated Water Initiative hydrological modelling (DWER, in prep) was undertaken in an area including 		

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		<p>this precinct (Punrak Drain). Available water quantities were significantly less than assumptions made in Table 29 (2,500 ML/a) at 0.25 GL at 2050 with an annual reliability of 80%.</p> <ul style="list-style-type: none"> • <i>Water supply Option 10</i>: It is assumed the water source being referenced is Karnet Brook, rather than Karnup Brook? • <i>Nomenclature</i>: Document uses managed aquifer recharge (MAR) in some water balance tables and aquifer storage recovery (ASR) in others however no glossary or descriptions of terms has been included. • <i>Preliminary Water Security Study – Long List of Options</i>: <ul style="list-style-type: none"> o Appendix A: future climate scenarios and impacts to groundwater and, in particular, surface water resources should have been discussed as it has implications for future water availability o It's noted that 10 % increase in water requirements are anticipated due to climate change impacts. This statement should also be balanced with principles of water sensitive urban design that would encourage a reduction in water requirements. <p>Thank you again for the opportunity to comment upon this important work. I would be happy to organise a meeting to further discuss the above, with particular reference to estimated surface water yields, and any other matters pertaining to this project.</p>		
Business				

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<p>Stewart Urban Planning IN20/16844</p>	<p>8.</p>	<p>As per our discussion late last week, we have prepared and hereby lodge the attached Submission, on behalf of BaptistCare, on draft Amendment 208, the Draft Byford District Structure Plan and the Draft Byford DCP Report 6.</p> <p>The Submission relates to Orton Road and makes the following three requests:</p> <ol style="list-style-type: none"> 1. That the function of Orton Road be clarified; 2. That the extension of Orton Road be aligned centrally along the southern boundary of the subject land; and <p>Attached to the Submission is a background report that identifies the relevant provisions within the existing / proposed planning framework, which will assist with understanding the reasoning behind our requests.</p> <p>Moving forward, we are keen to continue to work with the Shire on these (and other) matters as we progress toward lodgement of formal applications.</p> <p>LOT 2 (No.147) and LOT 3 (No.155) WARRINGTON ROAD, BYFORD</p> <p>Stewart Urban Planning acts for Baptistcare WA Limited ('Baptistcare'), the owner of Lot 2 (No.147) and Lot 3 (No.155) Warrington Road, Byford ('subject land').</p> <p>We hereby lodge this Submission on the following planning documents presently being advertised by the Shire of Serpentine-Jarrahdale ('Shire'):</p>	<p>The submission has been considered and the contents pertaining to the District Structure Plan noted.</p> <p>1. Orton Road is an Integrator B road as per Liveable Neighbourhoods, with parking drainage and a footpath.</p> <p>a) It will have a width of 30 metres from Tonkin Highway to South Western Highway.</p> <p>b) The road will be a single lane road only with no direct access to adjacent properties.</p> <p>The road would be required for access to the adjacent properties in the first instance. However it</p>	<p>a. That references to the function and location of Orton Road as a 30 metre wide single lane Integrator B road be modified to be consistent in the documents.</p> <p>b. That the ultimate extension of Orton Road through to South Western Highway be identified at grade, and the 30m reservation be equally positioned along the common boundaries requiring an equal 15m strip of land from both sides.</p>

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		<p>• Amendment 208 to Local Planning Scheme No.2 ('LPS2'); • Byford Traditional Infrastructure Development Contribution Plan ('BTIDCP') Report No.6; and • Byford District Structure Plan - December 2018 ('DSP'). Purposes of Submission The purposes of this submission are to: 1. Seek clarification of the function of Orton Road; 2. Request the extension of Orton Road be aligned centrally along the southern boundary of the subject land; and 3. Request the full width of Orton Road be included as a Development Contribution Item.</p> <p>This submission comprises the following sections: • Background; • Description of Land; and • Purposes of Submission.</p> <p>In addition, Attachment 1 contains a detailed overview of the relevant planning framework that has informed this Submission.</p> <p>Background Baptistcare acquired the subject land in October 2019 for the purpose of developing a Residential Aged Care and Retirement Living complex. A portion of the subject land is proposed to be developed with a Church. The land is 900 metres south-west of Baptistcare's existing Graceford residential care and retirement village situated on Turner Road, Byford. Graceford has served the local community since the mid 1980's and the proposed development will enable Baptistcare to continue to meet demand for aged care and retirement living from the emerging population in Byford. Description of Land The subject land comprises Lots 2 and 3 on Diagram 70480. Lots 2 and 3 each have an area of 3.3662 hectares and are situated on the eastern side of Warrington Road. Lot 2 has a frontage to Warrington Road of 100.31 metres. Lot 3 has a frontage of 80.31 metres to Warrington Road and 20 metres to Orton Road. The reserve for Orton Road</p>	<p>provides a higher order function too in the context of east west connectivity for Byford and Cardup, given the following:</p> <p>a) Abernethy Road will not be extended to join up with Tonkin Highway.</p> <p>b) Cardup Siding Road is not capable of carrying the traffic from the south-eastern areas of Byford northwards and westwards between South Western Highway and Tonkin Highway. Orton Road provides this intra-Byford link to ensure neighbourhood connectivity.</p> <p>2. Officers support the submission regarding the extension of Orton Road to be aligned centrally along the southern</p>	

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		<p>terminates at the western boundary of Lot 3. Grounds of Submission The purposes of this Submission are as follows.</p> <p>1. Clarify the function of Orton Road</p> <p>The various documents that comprise the relevant planning framework include different, and potentially conflicting, descriptions of the purpose, function and classification of Orton Road. This is summarised in the table below.</p> <table border="1" data-bbox="533 762 1128 1082"> <thead> <tr> <th>Document</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>South West Pool Sub-Regional Planning Framework</td> <td>Proposed Regional Road Proposed Integrator Arterial</td> </tr> <tr> <td>Daley Road Local Structure Plan</td> <td>Neighbourhood Connector Integrator B MRS Other Regional Road</td> </tr> <tr> <td>The Gleades Local Structure Plan</td> <td>Integrator B</td> </tr> <tr> <td>Byford Traditional Infrastructure Development Contribution Plan</td> <td>Local Distributor</td> </tr> <tr> <td>Draft Local Planning Scheme No.3</td> <td>Local Roads - Local Distributor (west of Warrington Rd only)</td> </tr> <tr> <td>Draft Byford District Structure Plan</td> <td>District Distributor Regional Distributor</td> </tr> </tbody> </table> <p>It is evident the purpose, function and status of Orton Road is not clear and further investigations are required to determine whether Orton Road should be reserved under either the Metropolitan Region Scheme or reserved under the Local Planning Scheme and included as an item in the Byford Development Contribution Plan.</p> <p>In this regard, we note the consultant representing various developers of land in Byford made a Deputation to the Council meeting held 20 July 2020 also querying the function and status of various roads in the area, including Orton Road. This also suggests that further detailed investigations are required.</p>	Document	Description	South West Pool Sub-Regional Planning Framework	Proposed Regional Road Proposed Integrator Arterial	Daley Road Local Structure Plan	Neighbourhood Connector Integrator B MRS Other Regional Road	The Gleades Local Structure Plan	Integrator B	Byford Traditional Infrastructure Development Contribution Plan	Local Distributor	Draft Local Planning Scheme No.3	Local Roads - Local Distributor (west of Warrington Rd only)	Draft Byford District Structure Plan	District Distributor Regional Distributor	<p>boundary of the Subject Land to ensure an equitable outcome.</p> <p>3. The Development contribution scheme will pay for the land and construction over and above the 20 metres standard requirement for internal roads to accommodate the urbanisation of Byford.</p>	
Document	Description																	
South West Pool Sub-Regional Planning Framework	Proposed Regional Road Proposed Integrator Arterial																	
Daley Road Local Structure Plan	Neighbourhood Connector Integrator B MRS Other Regional Road																	
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		<p>We request that the function of Orton Road be clarified in the relevant documents.</p> <p>2. Request the extension of Orton Road be aligned centrally along the southern boundary of the Subject Land The Draft Byford DSP suggests the proposed extension of Orton Road will be on the same alignment as the existing reserve west of Warrington Road. This conflicts with the established planning framework and is inconsistent with the stated purpose of the Draft Byford DSP.</p> <p>Clause 1.2 of the Draft Byford DSP confirms the District Structure Plan is a strategic document intended to guide more detailed planning in the form of Local Structure Plans. Clause 1.4 states the Draft Byford DSP is a high-level response to key issues and that subdivision and development proposals will be determined in accordance with the District Structure Plan and any applicable adopted Local Structure Plans.</p> <p>In this instance, there are two relevant and recently adopted Local Structure Plans: • Doley Road Local Structure Plan ('DRLSP'); and • The Glades Local Structure Plan ('TGLSP').</p> <p>Section 1.3.4 of the DRLSP (July 2017) indicates the Local Structure Plan responds to the approved version of TGLSP for the land to the north, west and south, being the version of TGLSP approved in 2011, including the alignment of Orton Road.</p> <p>Subsequent to this, a modified version of TGLSP was adopted in March 2019. This most recent and up-to-date version of TGLSP clearly shows the extension of Orton Road east of Warrington Road aligned centrally along the southern boundary of the subject land, with 15 metres of the required 30</p>		

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		<p>metre reserve on the subject land and 15 metres of the reserve on the land to the south within TGLSP.</p> <p>The alignment depicted in the recently adopted TGLSP is fair, equitable and reasonable, and supported by the owner of the subject land.</p> <p>The alignment shown in TGLSP is consistent with Objective (c) of the Urban Development zone under LPS2, which seeks to facilitate the “establishment of an equitable method for the distribution, between owners within [the] area, of the costs of nominated infrastructure components required for subdivision and development of the areas into communities.”</p> <p>Aligning the extension of Orton Road centrally along the southern boundary of the subject land is consistent with the purpose of Development Contribution Areas, as set out in Clause 9.3.2 of LPS2, which seeks to “provide for the equitable sharing of the costs of infrastructure... between owners.”</p> <p>To show the extension of Orton Road with 83% (25 metres) of its width on the subject land and only 17% (5 metres) on the land to the south, as suggested by the Draft Byford DSP, is inconsistent with orderly and proper planning.</p> <p>It is requested the Draft Byford DSP be modified so that the indicative alignment of the extension of Orton Road east of Warrington Road is consistent with the adopted TGLSP. Similarly, should it be necessary for draft LPS3 to be modified to extend the Local Reserve for Orton Road east of Warrington Road, the alignment of the Local Reserve should be consistent with the recently adopted TGLSP.</p>		

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<p>Harley Dykstra on behalf of 4 Alice Rd, Cardup IN20/14848</p>	<p>9.</p>	<p>Harley Dykstra is pleased to present this submission on the draft Byford District Structure Plan (DSP) to the Shire of Serpentine-Jarrahdale for consideration.</p> <p>Harley Dykstra acts for the landowner of Lot 50 (No.4) Alice Road, Cardup ('the subject land') who for many years has intended to subdivide the land. Our client generally supports the 'Special Residential' designation over the eastern part of the land, as proposed by the draft Byford DSP. However, this submission asserts the 'Special Residential' designation should be extended over the entirety of the land, as well as adjoining Lots 52 and 53 Alice Road to the south, to recognise the specific attributes of this atypical precinct of which the subject land forms part. Further to amending the extent of the Special Residential area, revised minimum lot size criteria should also be introduced. Further details and justification are provided in the following submission.</p> <p>DESCRIPTION OF THE PRECINCT</p> <p>Lot 50 Alice Road is located on the corner of Alice Road and Cardup Siding Road, within a somewhat unique precinct bound by Cardup Siding Road to the north, Redcliffe Road to the south, Soldiers Road/the railway to the east and lots with frontage to Alice Road forming the western edge of the broader Alice Road Precinct. Lots within the precinct typically range in area from 2,000m² to 3,100m² and have been developed with single dwellings (See Figure 1 below). The subject land itself has been developed with a single dwelling (around 1970) which was sited with the clear intention of facilitating further subdivision of this 1.1226 ha land parcel at a later stage, consistent with the established pattern of subdivision and development along both sides of Alice Road. Being a corner lot, the subject land also lends itself to the</p>	<p>The submission has been considered and the contents noted.</p> <p>a) The Shire has made a decision in this regard in terms of the Local Planning Strategy and we will have to await the outcome of this process through the Western Australian Planning Commission.</p> <p>All areas that are not located within the "Urban Development" zone under Town Planning Scheme No.2 or the "Urban" zone under the Metropolitan Region Scheme are recommended to be removed from the draft Byford District Structure Plan.</p>	<p>That the Byford District Structure Plan be modified to reflect the area designated as Development Area 3 in the Serpentine Jarrahdale Town Planning Scheme No. 2 and "Urban" under the Metropolitan Region Scheme.</p>

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creation of a balance lot with separate frontage to Cardup Siding Road. The draft Byford DSP recognises (to an extent) the special circumstances that apply to this precinct by designating lots on the west side of Alice Road as 'Special Residential' (See Figure 2 below).



FIGURE 1: AERIAL LOCALITY PLAN

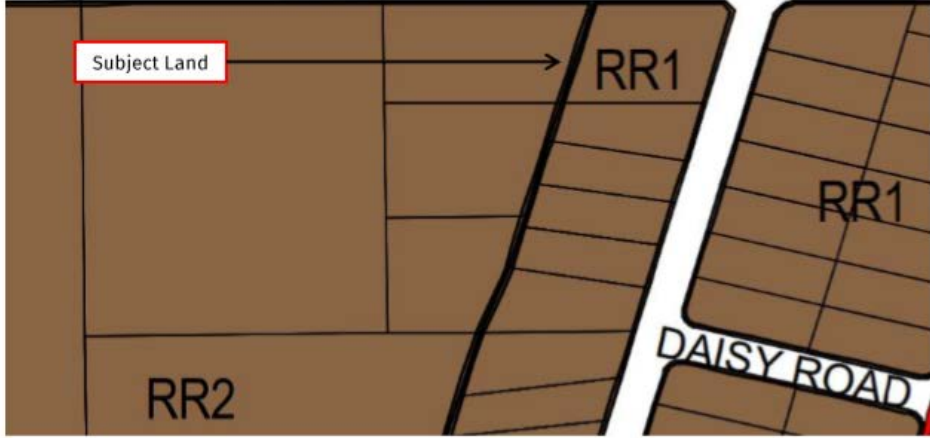
The subject land is currently zoned 'Rural' under the Shire of Serpentine-Jarrahdale Town Planning Scheme No.2. (TPS 2). Under Draft Local Planning Scheme No.3 (LPS 3), the eastern portion of the subject land is proposed to be zoned 'Rural Residential 1' and the western portion 'Rural Residential 2' (See Figure 3 below).

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		 <p style="text-align: center;">FIGURE 3: DRAFT LPS 3 ZONING MAP</p> <p>Neither the current TPS 2, nor draft LPS 3 properly recognise the established pattern of subdivision within this precinct and provide for the logical completion of subdivision and development as anticipated by landowners who have held land for a significant period of time with the very reasonable expectation that the subdivision potential of the land could be realised.</p> <p>It is understood the draft DSP is intended to function as a high level strategic planning instrument and in part will inform the Shire's response to requests for rezoning and Local Structure Plans within the Byford DSP area.</p> <p>Progressing a future Scheme Amendment to LPS 3 to properly reflect the established Alice Road Special Residential Precinct (including minor</p>		
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		<p>modifications as proposed by this submission) provides one pathway to resolve this inconsistency within the planning framework. However, as part of this submission, we request the Shire continue to promote the planning logic of properly identifying the Alice Road Special Residential Precinct not only as part of finalising the draft Byford DSP, but also as part of ongoing representations to the WAPC prior to the finalisation of draft LPS 3. Figure 4 (over page) more correctly represents the established extent of the Alice Road Special Residential Precinct and should be adopted as part of finalising the draft Byford DSP. It is noted the Alice Road Special Residential Precinct is not identified within the draft Byford DSP as a Local Structure Plan area (Figure 2 – Map of Byford Local Structure Plan Areas refers). This submission does not necessarily promote the idea that a Structure Plan would be required to facilitate the completion of subdivision in this precinct, given there are only two (2) lots that retain subdivision potential under the lot size criteria put forward in this submission. Further details are provided in the following section of this submission.</p>		

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		 <p data-bbox="712 1066 1328 1086">FIGURE 4: PROPOSED ALICE ROAD 'SPECIAL RESIDENTIAL' PRECINCT</p> <p data-bbox="521 1114 1514 1174">LOGICAL COMPLETION OF SUBDIVISION WITHIN ALICE ROAD PRECINCT</p> <p data-bbox="521 1198 1514 1393">Existing lots fronting Alice Road generally range in area from 2,000m² to 3,100m². The only exceptions within the broader Alice Road Precinct are Lots 50, 52 and 53 Alice Road which are 11 226m², 8072m² and 6968m² in area, respectively. Each of these lots have already been developed with dwellings fronting Alice Road, although Lot 50 has a frontage equivalent to approximately twice the width of all the other lots fronting Alice Road, on the</p>		
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		<p>basis it was always intended to accommodate a second dwelling fronting Alice Road.</p> <p>Lot areas for 'Special Residential' zones are designated as 4,000m² to 1ha under the draft Byford DSP. This notwithstanding, the WAPC's DC 2.5 – Special Residential Zones provides for lot sizes within 'Special Residential' zones as follows:</p> <p>“To provide for the creation of lots of between 2,000 square metres and one hectare in suitable locations.”</p> <p>Accordingly, this submission seeks a lot range of 2,000m² to 1 ha be adopted, except for lots without direct frontage to Alice Road (including battle axe lots) where a minimum 4,000m² lot size would apply, consistent with WAPC policy and the established pattern of subdivision within this precinct.</p> <p>Under these criteria, a total of only three (3) additional lots could be created within the entire Special Residential Precinct proposed by this submission, due to the pattern of subdivision that has already occurred. No other lots could be subdivided within the proposed Special Residential Precinct.</p> <p>The logical completion of the originally intended pattern of subdivision and development within this precinct could readily be achieved as demonstrated by the Concept Subdivision Plans at Appendix A.</p> <p>It is noted the further subdivision of Lot 52 is unlikely to be able to satisfy the proposed 2,000m²/4,000m² lot size requirement.</p>		

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CONCLUSION

This submission supports the general intent of the draft Byford DSP and in particular, its recognition of the current pattern of subdivision fronting Alice Road, including our client’s land. We respectfully request minor modifications to the extent of the proposed ‘Special Residential’ and minimum lot size criteria which shall facilitate completion of the originally intended pattern of subdivision in this precinct.

APPENDIX A | SUBDIVISION CONCEPT PLAN



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<p>Taylor Burrell Barnett On behalf of LWP Byford Syndicate IN20/18787</p>	<p>10.</p>	<p>Submission on Draft Byford District Structure Plan</p> <p>Taylor Burrell Barnett (TBB), on behalf of our client LWP Byford Syndicate (LWP), is pleased to lodge the following submission with the Shire of Serpentine Jarrahdale on the Draft Byford District Structure Plan (DSP).</p> <p>As you are aware, our client has an interest in this matter as it is the developer of the residential estate at The Glades in Byford and is a landowner within The Glades Byford Town Centre Structure Plan area.</p> <p>Submission</p> <p>The key aspects of our submission as they relate to the development of land for LWP, include:</p> <ul style="list-style-type: none"> • a) Concerns relating to population projections that provide false demands on transport infrastructure, community facilities and retail and commercial floorspace. • b) Inconsistencies between the draft DSP and existing approved The Glades Local Structure Plan (LSP). • c) Inconsistencies between the draft DSP and existing approved and proposed Byford Town Centre LSP. • d) Lack of confidence that the traffic modelling underpinning the proposed movement network is accurate and reliable. • e) Reconsideration of terrace and apartment housing typologies for Medium/High Density (Urban) areas. 	<p>The submission has been considered in conjunction with the Byford Industry Reference Group response on the Development Contribution Plan. Where appropriate the matters addressed in the latter have been addressed in that Schedule of Submissions.</p> <p>a) The population projections of 2009 cannot be relied upon to determine the current and future population due to significant increases both in density and the urban footprint of the Byford urban area. As an example the average lot sizes of current subdivisions (approximately 400sqm)</p>	<p>a. That the outcome regarding the negotiations about the Cardup/Orton oval be reflected. This is to require a revised oval design which is a single senior Australian rules football oval, which can also accommodate two rectangular pitches in the footprint of the oval.</p> <p>b. That text be included that acknowledges that local structure plans provide a greater level of detailed planning than the District Structure Plan, however the District</p>
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		<p>• f) Reconsideration of operational requirements for the existing approved DSP and proposed DSP and consistency with the Deemed Provisions of the Planning Regulations.</p> <p>This submission should be read in conjunction with the joint submission prepared by the Byford Industry Reference Group (BIRG) in response to the Shire's proposed Scheme Amendment No. 208 and Development Contribution Plan 6 (DCP 6).</p> <p>a) Population Projections</p> <p>The population figures as stated in the Draft DSP and Perth and Peel@3.5million (at 2050) are generally in alignment and we acknowledge the Shire's review of population figures that have previously informed much of the strategic planning for the Shire to bring them in line with forecast.id. Whilst we appreciate this review, there is still significant concern with the Shire's long-term growth targets and lack of appropriate justification that is underpinning the level of infrastructure requirements for Byford.</p> <p>As outlined in Table 1 below, the existing Byford DSP (2009) estimated a population of 38,000 people for the Byford DSP at full build-out. The Draft DSP estimates a population for Byford by 2050 of 60,054. Excluding the Development Investigation Areas (DIA) a population of 50,630 by 2050 is estimated. Based on these estimates, a 58.04% increase in population is expected to occur since the preparation of the original DSP in 2009.</p> <p><i>Table 1: Population and Density - Byford Approved & Proposed DSPs</i></p>	<p>are generally below the minimum lot sizes of the original <i>The Glades</i> local structure plan (indicated as 500sqm).</p> <p>b)i) The matter of the Cardup/Orton Road open space has now been resolved through discussions.</p> <p>b)ii) The District Structure Plan shows the general land uses and not the finer detail as per the local structure plan. Officers acknowledge that the land uses (densities and environmental corridors) designated on the local structure plan are the more accurate and that the district structure plan does not intend to change the designations of this more detailed plan.</p>	<p>Structure Plan should be given due regard.</p> <p>c. That the structural changes reflected in the recent Council approved amendments to the Byford Town Centre Local Structure Plan be reflected in the District Structure Plan. This ensures the evolving access, road network, environmental corridor and land use arrangements are consistent between the DSP and amended Local Structure Plan.</p> <p>d. That the updated road design configurations consistent with the Cardno study are reflected in the</p>

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		<table border="1" data-bbox="533 478 1482 598"> <thead> <tr> <th></th> <th>Byford DSP (2009)</th> <th>Draft DSP (2018)</th> </tr> </thead> <tbody> <tr> <td>Estimated number of lots/dwellings</td> <td>Unknown</td> <td>20,780</td> </tr> <tr> <td>Estimated population</td> <td>38,000</td> <td>60,054 (at 2.89 people per household)</td> </tr> <tr> <td>%age increase in population from Approved DSP</td> <td></td> <td>58.04%</td> </tr> </tbody> </table> <p>Further to the information contained in Table 1, DCP 4 identifies a total lot/dwelling yield of 11,646 and applying a calculation of 3 persons/dwelling (as per ABS Census) this equates to an approximate population of 35,000 persons for the Byford DCA. Acknowledging that the DCA does not include the existing Byford Development, Byford by the Scarp and future DIA, our high-level calculations would suggest that even when factoring in this additional development, an approximate 14,000 lots/dwellings and 41,000 persons is generated. This projected growth is significantly less than that anticipated and is not believed to be sufficient enough to justify the infrastructure requirements as proposed under the Draft DSP.</p> <p>Based on this analysis of the Shire's population projections, it is difficult to comprehend how/why the increase in population between the original DSP (2009) and draft DSP (2018) is so significant (approx. 58.04%) when there are essentially only 3 DIA added to the Byford DSP area (9,424 people) and where the additional lots are being generated from.</p> <p>The development group involved in the preparation of this submission represent the majority of the landholdings within the Byford Urban Area and in reviewing each of the development areas within the Byford Development Contribution Area (DCA) in isolation we believe that there is approximately 10-12 years of supply remaining within these major estates. As noted in the Draft DSP, the DIAs only generate an additional 2,200 dwellings and 9,500</p>		Byford DSP (2009)	Draft DSP (2018)	Estimated number of lots/dwellings	Unknown	20,780	Estimated population	38,000	60,054 (at 2.89 people per household)	%age increase in population from Approved DSP		58.04%	<p>c) The inconsistencies between the new Byford Town Centre Local Structure Plan and the District Structure Plan are acknowledged. The latter should be changed to accord with the local structure plan.</p> <p>d) Infrastructure to provide comment on the reliability of the traffic modelling.</p> <p>d)i) A review of the traffic volumes included within the TIA model as it is expected that full build-out of the Byford development cell will occur prior to 2031 resulting in false demands on transport infrastructure.</p>	<p>amendments to the DSP. This ensures the DSP accurately depicts the Cardno informing study.</p>
	Byford DSP (2009)	Draft DSP (2018)														
Estimated number of lots/dwellings	Unknown	20,780														
Estimated population	38,000	60,054 (at 2.89 people per household)														
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		<p>persons. Existing Byford areas will be subject to very little growth over this planning horizon.</p> <p>The population forecasts for the Byford area established through the Shire's forecast.id web portal cannot be relied upon on their own and should be informed by a contextual analysis similar to the high-level overview we have provided above. The Shire's long-term population projections provide false demands on transport infrastructure, community facilities and retail and commercial floorspace. Given this data is being relied upon to substantiate the forecast growth for the Shire and to assess the level of infrastructure requirements, we maintain that a review of the Shire's population projections for the Byford development area is required.</p> <p>Recommendation: • Undertake a review of the Shire's long-term growth targets to:</p> <ul style="list-style-type: none"> o Confirm population capacity and locations to accommodate growth; o Substantiate traditional and community infrastructure requirements and increases in retail and commercial floorspace as proposed under the Shire's strategic planning and DCP frameworks. <p>b. Inconsistencies between the Draft DSP and The Glades LSP</p> <p>i) Cardup District Open Space</p> <p>The Draft DSP identifies an area of land to accommodate a district open space (DOS) facility with the ability to incorporate two senior sized playing fields (approximately 12 hectares in area), consistent with the Shire's draft Local Planning Strategy, Community Infrastructure and Public Open Space Strategy (CIPOSS) and Community Infrastructure Implementation Plan (CIIP), as shown on Figure 1 below.</p>	<p>d)ii) Detail on the modelling procedure and confirmation that that appropriate simulation was included.</p> <p>d)iii) Detail on what capacity values have been used in the model for the road network.</p> <p>d)iv) Request MRWA include major infrastructure items such as the Orton Road / South-West Highway connection within the ROM model.</p> <p>e) Single storey medium/high density residential dwellings will not achieve the urban design outcomes and density required in the town centre.</p>	

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Figure 1 - Draft Byford DSP – District Open Space (extract)

LWP has been working with the Shire to investigate opportunities to incorporate a DOS facility within The Glades Cardup Precinct, south of Orton Road, for a number of years. More recently discussions have related to the provision of a facility that would incorporate only one district oval.

LWP lodged an application for subdivision with respect to Stage 1 of the Cardup Brook Precinct (south of Orton Road), which was subsequently approved by the WAPC on 10 July 2020. In essence, the subdivision application provided the impetus to reach agreement on the location, design, timing and delivery of DOS within the Cardup Brook Precinct.

Agreement was reached between the Shire and LWP, and supported by Council at its meeting of 16 March 2020 to secure a DOS facility within the Cardup Brook Precinct of at least one senior Australian Rules Football size,

f) Provision 1 of Development Area 3 listed under Shire of Serpentine Jarrahdale Town Planning Scheme No. 2, provides that the Byford Development Area is subject to the provisions of the Byford Structure Plan.

This is a District Structure Plan, that was granted final approval by Council on 22 August 2005, and has been amended from time to time.

This updated Draft District Structure Plan, adopted by Council for advertising at the 17 December 2018 meeting, represents the latest version of the District Structure Plan and is being advertised

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		<p>which is flexible to also accommodate two rectangular pitches. It was acknowledged by the Shire that under the existing approved statutory planning framework (adopted DSP and LSP) that no DOS is provided within the LSP area.</p> <p>Given the Draft DSP preceded these agreements between the Shire and LWP, and the approval to WAPC 158803 with support from the Shire, there is a requirement to update the Draft DSP to reflect the revised location and size of the DOS facility, which will accommodate one senior sized oval only.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • In line with the resolution made by Council on 16 March 2020, modify the Draft Byford DSP to support the proposal for the DOS to accommodate one senior sized oval only approximately 4ha in area (i.e. an Australian Rules Football senior oval (which can include two rectangular pitches) in the location as agreed between the Shire and LWP. <p>ii) Mapping anomalies / errors</p> <p>In reviewing the Draft DSP against the approved The Glades LSP, there are several anomalies or errors in the mapping that require addressing in the finalisation of the documents as outlined below:</p> <ul style="list-style-type: none"> • Various residential cells shown as 'Low (Suburban): R20-35' and 'Community and Public Purpose' on the Draft DSP (outlined in red on Figure 2 below) should be identified as 'Medium-High: R40100' consistent with the designations as 'Residential R40', 'Residential R50' and 'Residential R60' on the approved The Glades LSP. • Configuration of various 'Multiple Use Corridor/Local Open Space' areas on the Draft DSP (outlined in green on Figure 2 below) should be identified 	<p>concurrently, though independently, to this amendment, for community consultation in its draft form.</p> <p>If Council adopts this Draft District Structure Plan following advertising, it will become the latest version of the Byford Structure Plan, in accordance with Provision 1 of Development Area 3.</p> <p>As a District Structure Plan, it is not being prepared or determined under the Deemed Provisions of the Scheme. Rather, it is being considered in accordance with the specific Development Area provisions.</p>	

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correctly consistent with the location and configuration as public open space (POS) on the approved The Glades LSP.

- Figure 15 Existing Environment of the Draft DSP identifies a ‘Green Linkage’ over the majority of The Glades LSP area (as shown on Figure 3 below). It is acknowledged that this linkage encompasses the Cardup Brook and is a key ecological linkage, however the extent as identified on Figure 15 does not reflect the environmental qualities and attributes of the site and does not acknowledge the identification of The Glades LSP area for urban development.



Figure 2 - Draft Byford DSP – The Glades LSP area (extract)

The purpose of this amendment is to update and align TPS2 with the Shire’s updated and council approved draft District Structure Plan which is an informing, relevant and strategic document that enables the consideration and exercising of discretion for Structure Plans and Local Development Plans, which fall under the auspices of the deemed provisions.

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Figure 3 - Existing Environment – The Glades Cardup Brook Precinct (extract)

b)iii) Inconsistencies between the Draft DSP and Byford Town Centre LSP

It should also be acknowledged by the Shire that since preparation of the Draft DSP in 2018 an Amendment to the Byford Town Centre LSP has been prepared and advertised for public comment.

Our review has identified a number of inconsistencies between the Draft DSP and existing and proposed Byford Town Centre LSP. The DSP is intended as an informing, relevant and strategic document which enables the consideration and exercising of discretion for Structure Plans and Local Development Plans. Table 1 of the Draft DSP acknowledges that an approved LSP exists for the Byford Town Centre (referred to as LSP Area A within the draft DSP). Clause 1.4 of the Draft DSP states that subdivision and development will be determined in accordance with the applicable zoning, planning scheme provisions, the Byford DSP and an approved LSP.

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		<p>Unless specifically stated within Part 1 of the Byford DSP, the design and outcome of any existing approved LSP's will be upheld. Subdivision and development will be determined in accordance with the applicable zoning, planning scheme provisions, the Byford DSP and an approved LSP. Where there is any inconsistency between the DSP and an approved LSP, including all LSP's that are approved prior to the DSP Review, the provisions contained within LSP's will be upheld, unless specified in the DSP. As such, consideration needs to be given to the extent to which the Draft DSP deviates from the approved LSP and proposed LSP Amendment.</p> <p>An overview of these inconsistencies is outlined below and should be read in conjunction with the more detailed submission prepared by TBB, on behalf of LWP, in relation to the proposed Amendment to the Byford Town Centre LSP.</p> <ul style="list-style-type: none"> • The Draft LSP Amendment proposes additional commercial floorspace along Abernethy Road, which is identified as 'Medium-High: R40-100' on the Draft DSP and 'Residential R15' and 'Residential R30' on the approved LSP. • The Draft DSP fails to acknowledge the existing residential densities under the approved LSP. Whilst the identification of land for 'high density' is generally supported given the site's designation as a District Centre and proximity to the future train station, the Draft DSP fails to acknowledge the existing residential densities under the approved LSP (residential densities of R15, R25, R30 and R60). • The Draft DSP recommends the realignment of San Simeon Boulevard to direct traffic from Thomas Road to Abernethy Road and through the Byford Town Centre. The alignment will direct traffic through the residential area, which is less than desirable and does not directly service the Town Centre. The TIA does not substantiate the proposed realignment from a technical 		

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		<p>perspective nor provide appropriate justification for the proposed increase in the road reservation width.</p> <ul style="list-style-type: none"> • Review of the width and location of Multiple Use Corridors across the LSP area. <p>Recommendation:</p> <ul style="list-style-type: none"> • Review of the DSP is required to bring in line with the proposed Amendment to the Byford Town Centre LSP given the extent of inconsistencies between the Draft DSP, existing LSP and proposed LSP Amendment. <p>District Road Planning</p> <p>The draft DSP proposes a number of changes to the district and local movement network that have a significant bearing on the progression of planning for The Glades LSP area, Byford Town Centre LSP area and the Byford locality generally. An initial review of the Traffic Impact Assessment (TIA) (Cardno, 29 June 2020) by traffic engineers, Riley Consulting, identified that the TIA contained fatal flaws in the modelling and was devoid of critical detail. These matters were raised with the Shire's Director of Development Services for initial feedback to inform this submission.</p> <p>A fundamental concern relates to the implications of the Shire's population estimated under the draft DSP that drive the need for changes to the district movement network and major infrastructure proposed under the DSP. As per the figures outlined in Table 1, we find it difficult to understand how/why the population of Byford is expected to more than double between the original DSP (2009) and draft DSP (2018) when there is approximately 10-12 years of supply remaining within these major estates and only three addition DIAs generating 9,500 persons.</p>		

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		<p>Whilst we appreciate the Shire's response, there is still significant concern with the level of information provided in the TIA and lack of appropriate justification and technical assessment to the proposals as discussed further below. In the absence of any additional detail being provided by the Shire, it is difficult and somewhat meaningless for a comprehensive review of the TIA to be undertaken by Riley Consulting.</p> <p>Validity of traffic modelling</p> <p>A fundamental concern from an initial review by Riley Consulting is the accuracy and validity of the traffic modelling used in the TIA, which would appear to be a combination of Main Roads WA (MRWA) ROM24 model for 2031 and additional Cardno modelling. This has given rise to the following concerns:</p> <ol style="list-style-type: none"> 1. The TIA does not address how the MRWA data has been applied to the Cardno model nor if the demands shown in report Figure 3-4: ROM24 Daily Traffic Volumes (2031 horizon) are validated. <p>The Shire advised that the modelled outcomes are contained within Section 3.4, Table 3-1 of the TIA, however detail on how the assumptions have been determined is not provided.</p> <ol style="list-style-type: none"> 2. The Shire contends that full build-out of Byford may not be achieved within the 2031 horizon, which is the only ROM24 time scale currently supplied by MRWA. As such, the ROM24 outputs and land use projections provided by Local and State Government agencies have been used as the basis of this TIA to establish an anticipated development and traffic scenario at the point when build-out of the Shire's development planning has been achieved. 		

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		<p>However, based on our determination that full build-out of the Byford development cell will occur prior to 2031 that the MRWA ROM model should therefore include the full level of development growth for Byford. Any additional demand added to the MRWA ROM model post 2031 to 'full buildout' as anticipated by the Shire results in false demands on transport infrastructure.</p> <p>The Shire's statement that a mesoscopic traffic model was developed to model the current traffic situation is not sufficient and this merely advises that a model based on small group analysis was undertaken.</p> <p>1. The MRWA ROM model for 2031 does not contemplate the connections of Orton Road nor Mead Street to South-West Highway, however the Cardno model assumes these connections. It was provided by the Shire that both connections are consistent with the Perth and Peel @ 3.5 Million and the South Metropolitan Peel Sub-Regional Planning Framework.</p> <p>Whilst this is not disputed, reliance of the MRWA ROM model is unreliable as a base model as these connections would not have been run as model options by MRWA, nor does the TIA address how the MRWA data has been applied to the Carndo model more generally.</p> <p>4. Basic modelling parameters (road capacity) information was requested by the Shire to inform our review of the TIA. The Shire advised that there were constraining parameters associated with a number of road requirements, predominantly to reflect pre-existing infrastructure, environmental conditions, and structure planning expectations identified.</p>		

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		<p>The level of information provided by the Shire in response to our request did not identify the capacity values that were used in the model for the road network.</p> <p>5. A high-level review of the current and future traffic demands as outlined in the TIA has raised concerns that bring into question the justification for proposed changes to the movement network and form/composition of such roads. The below is a summary of the concerns noted with respect to proposed road upgrade and reserve requirements to the district and local movement network:</p> <ul style="list-style-type: none"> • <u>South-West Highway</u>: the MRWA ROM shows current traffic demands on South-West Highway (south of Orton Road) will double by 2031 and the Cardno model forecasting traffic volumes at approximately 20,000vpd at full build-out. <p>We question these predicted volumes given current traffic data shows minimal change over the past 6 years and the influence that the construction of Tonkin Highway will have on traffic using South-West Highway. We reiterate that it is important to know what assumptions are included in the ROM.</p> <ul style="list-style-type: none"> • <u>Tonkin Highway</u>: a review of the Cardno model suggests a significant imbalance in peak demand. The PM peak southbound is almost 5 times the PM peak northbound and the existing southbound demand north of Thomas Road is double the northbound flow. <p>We question these predicted volumes as the increase appears excessive and it would also be expected that the same proportions would apply.</p>		

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		<p>In the absence of this information, changes to key district roads cannot be substantiated at this point in time and it is difficult to undertake an informed review and provide accurate comments on the draft DSP.</p> <p>Justification for major infrastructure</p> <p>The draft DSP proposes a number of major infrastructure items that require significant land acquisition and constructions costs. The Shire contends that the key road and infrastructure upgrades proposed for the Byford area are identified by State planning documents Perth and Peel @ 3.5 Million and the South Metropolitan Peel Sub-Regional Planning Framework however the TIA does not contain the level of technical justification required to substantiate such proposals. These items are proposed to be fully funded by the DCP, and as outlined in more detail in our submission on draft Scheme Amendment No. 208, these costs present a significant cost burden to development in the area.</p> <p>The high-level assessment undertaken draws the following concerns with respect to the proposed Orton Road rail / grade-separated crossing.</p> <ul style="list-style-type: none"> • Whilst it is acknowledged that this connection is identified in the Framework, it would appear that there has been very little assessment of the physical ability to achieve such a connection. Based on the application of a generic 3% gradient, the required length for the approach ramp would be over 200 metres, however the distance between South-West Highway and the rail is only 230 metres. <p>The location of the future intersection of Orton Road and South-West Highway is approximately 100 metres north of Clondyke Drive. In applying the principles of Liveable Neighbourhoods, a separation distance of 125 metres would be required based on a vehicle speed of 80kph. We reiterate</p>		

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		<p>our above comment, that there would appear to be minimal design and technical investigation into the actual ability to achieve the proposal.</p> <ul style="list-style-type: none"> • Given the cost and district/regional significance associated with this proposal, there would appear to be appropriate justification for inclusion within the ROM model. It is not apparent whether these discussions have occurred with MRWA. <p>Recommendations:</p> <ul style="list-style-type: none"> • A review of the traffic volumes included within the TIA model as it is expected that full build-out of the Byford development cell will occur prior to 2031 resulting in false demands on transport infrastructure. • Detail on the modelling procedure and confirmation that that appropriate simulation was included. • Detail on what capacity values have been used in the model for the road network. • Request MRWA include major infrastructure items such as the Orton Road / South-West Highway connection within the ROM model. <p>In summary, the recommendations and proposals under the draft DSP should be substantiated and supported by the appropriate technical assessments, particularly as they inform the DCP which places the financial responsibility for the infrastructure on the future community and on this basis, needs and nexus needs to be established.</p> <p>e. Housing typologies for Medium/High Density (Urban) areas</p> <p>The Draft DSP states that housing typologies within the Medium/High Density (Urban) area should include dwelling types such as terraces (grouped</p>		

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		<p> dwellings) and apartments (multiple dwellings) provided in close proximity to amenity and public transport.</p> <p> Whilst medium to high density development is considered appropriate to the surrounding context as identified in the Draft DSP, consistent with the recommendations of Liveable Neighbourhoods and achieving density targets and affordability objectives of Perth and Peel @3.5million, the DSP should provide for greater flexibility with respect to housing choice and diversity. Appropriate built form outcomes that align with medium density development are capable of being delivered through single-storey development. This form of development should be considered in the context of surrounding lower density development and market demand. There is the potential that areas identified as medium/high density (urban) could remain undeveloped and sterilised for some time given there is limited market demand for multi-storey development in Byford.</p> <p> Recommendation:</p> <ul style="list-style-type: none"> • The preferred housing typology for areas identified as ‘medium/high density (urban)’ on the Draft DSP be modified to encourage appropriate medium to high density residential housing typologies in order to increase housing choice and meet housing affordability objectives. <p> f. Operation of the DSP</p> <p> The draft DSP states that the Byford DSP will come into operation on the day it is approved by the WAPC and will replace the 2009 Byford DSP.</p> <p> However, we note that the Shire contends that the provisions of Town Planning Scheme No. 2 (TPS 2) provide for a single DSP to be adopted to</p>		

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		<p>guide subdivision and development that covers Development Areas No. 1 and 2 and if Council adopts the draft DSP following advertising, it will become the latest version of the single DSP, in accordance with Provisions 1 of Development Areas No. 1 and 2. The Shire fails to acknowledge that the Deemed Provisions of the LPS Regulations are applicable to all local planning scheme, whether or not they are incorporated into the local planning scheme text and where there is any inconsistency, the deemed provision prevails.</p> <p>It is a requirement of the Planning and Development (Local Planning Schemes) Regulations 2015 (Deemed Provisions) that a decision is required by the Commission with respect to any structure plan received by the Local Government. A decision of the Commission on a proposed structure plan may involve approval of the structure plan; modifications to the structure plan in the manner specified by the Commission; or refusal of the structure plan.</p> <p>Furthermore, the existing Byford DSP was originally approved by the WAPC in 2005 and subsequently modified and approved by the WAPC in 2009. Given there is a WAPC-endorsed DSP in place for the Byford DSP area, this DSP will need to be revoked should the WAPC make a decision under the Deemed Provisions to approve the proposed draft DSP. The Deemed Provisions provide for the WAPC to revoke its approval of a structure plan if the WAPC considers that the structure plan cannot be effectively implemented because of a legislative change or a change in a State planning policy.</p> <p>The position of the Shire that the provisions of TPS 2 allow the Shire to adopt a DSP and replace the existing WAPC-endorsed DSP is inconsistent with the statement under Part 1.2 of the draft DSP which states that the WAPC's approval of the draft DSP will be required.</p>		

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		<p>Recommendation:</p> <ul style="list-style-type: none"> Shire to adopt due and proper process as required by the Deemed Provisions of the LPS Regulations with respect to consideration of the DSP by the appropriate decision making agency, being the WAPC. <p>Conclusion</p> <p>We trust that the information presented above be taken into consideration by the Shire in consideration of the draft DSP following public advertising.</p>		
<p>Urbanism IN20/25666 (LATE)</p>	<p>11.</p>	<p>Thank you for the meeting today and the reference to the draft Byford Structure Plan in our discussion. I have not been able to obtain a link to the plan to deliver comment. Notwithstanding this, I wish to submit two comments for your consideration in finalising the draft plan:</p> <ul style="list-style-type: none"> The structure plan proposes the extension of Orton Road through to South Western Highway to reduce traffic congestion on Soldiers Road. This is also earmarked as a primary east-west connector between Tonkin Highway and South Western Highway, to the west of Lot 128 South Western Highway. The road is earmarked to exceed a reserve width of 30m and requires an on-ramp onto the South Western Highway. The future reserve for this road follows the inside of the southern boundary of Lot 128 South Western Highway. It will consume approximately 4,350m² of this lot, which is excessive for a single property owner to absorb. We propose that the alignment of road be reviewed to allow for an equitable sharing of this road reserve across Lot 128, the drainage reserve and the private property to the south of Lot 128. 	<p>The submission has been considered and the contents pertaining to the District Structure Plan noted.</p> <p>Orton Road will have a width of 30 metres from Tonkin Highway to South Western Highway.</p> <p>Officers support the submission regarding the extension of Orton Road to be aligned centrally along the southern boundary of the subject</p>	<p>That the ultimate extension of Orton Road through to South Western Highway be identified at grade, and the 30m reservation be equally positioned along the common boundaries requiring an equal 15m strip of land from both sides.</p>

NEW SUMMARY OF SUBMISSIONS
Byford District Structure Plan
PA18/777

Responsible Business Unit: Strategic Planning

Advertising Date: 21 May 2020 to 31 August 2020

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		<ul style="list-style-type: none"> The structure plan references a grade separated intersection design for the rail crossing of Orton Road. Should this be pursued, it will block a Robinson Road connection to this road. It is also doubted that acceptable grades could be achieved along this section of Orton Road to achieve a separated grade rail crossing and an at grade crossing at the across the South Western Highway. This road should be designed as a level crossing over the rail. 	land to ensure an equitable outcome.	