

All enquiries to Strategic Planning on 9526 1111

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28 January 2025

Office of Chief Executive Officer
City of Armadale
Locked Bag 2
ARMADALE WA 6992

Dear Sir/Madam

Request for Comment on Draft Structure Plan - Stage 2 Doobarda Industrial Area

The Shire of Serpentine Jarrahdale would like to thank the City of Armadale for the opportunity to comment on the proposed Structure Plan for Stage 2 Doobarda Industrial Area.

Shire officers have reviewed the proposed Structure Plan and would like to provide the following comments.

Land Use Compatibility and Amenity

The proposed Structure Plan identifies an 'Industrial Business' designation adjacent to an existing Rural Residential area within the Shire located to the south of Rowley Road. This Rural Residential area contains sensitive residential land uses. The location of the proposed 'Industrial Business' land use in relation to the existing Rural Residential lots on the southern side of Rowley Road does not provide a buffer from the proposed industrial uses to the existing sensitive land uses. The Shire has concerns that the location of 'Industrial Business' adjacent to rural living land uses may result in land use conflicts. The 'Industrial Business' land uses may generate offsite impacts that have the potential to adversely affect the amenity of the adjacent rural living properties. As such, the Shire recommends that the Structure Plan outlines measures to protect the amenity of the rural living properties to the south and address any potential impacts from the 'Industrial Business' area. It must be demonstrated that the proposal can ensure compliance with the Environmental Protection Authority (EPA) Guidance for the Assessment of Environmental Factors - Separation Distances between Industrial and Sensitive Land Uses. Consideration should also be given to visual amenity impacts to the rural living area and how such impacts can be mitigated.

Additionally, the Shire recommends that the visual amenity impacts to the rural living properties within the Shire be addressed with measures such as landscaped planted buffers and vegetation screening. This is important to retain the established rural character and visual amenity within the Shire's rural living areas.



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A vegetation edge will also reduce the pressure to front development onto Rowley Road, which is often a direct preference for the likes of service stations, quasi bulky goods land uses and the like. A deep vegetation screen of 50m, stretching the full width of the interface (and taking account of Rowley Road widening), would be effective in this respect.

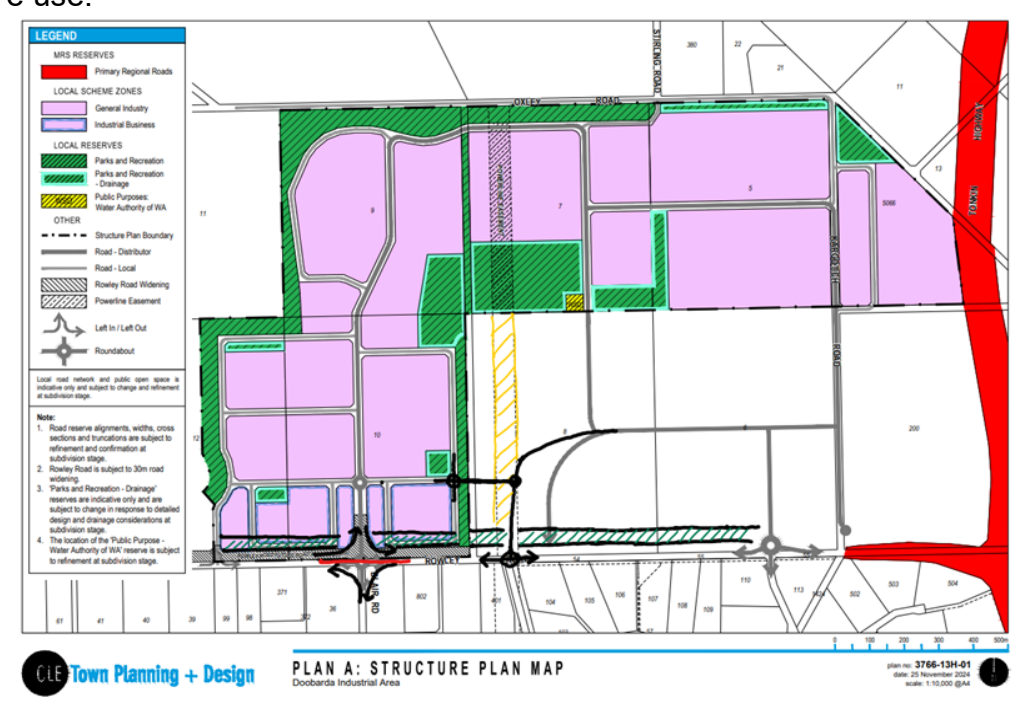
Interface Concerns

The Shire would recommend associated controls within Part 1 of the Structure Plan to address the careful interface issues. Already landowners along Rowley Road have raised amenity concerns associated with development within Stage 1 of the Structure Plan, particularly pertaining to light and traffic impacts. Whilst an Industrial Business interface would imply a graduation of land use with less impacting uses fronting Rowley Road, there is still concerns that land uses at this interface could generate offsite impacts that could adversely affect the amenity of the adjacent rural living properties. The Shire recommends that Part 1 of the Structure Plan ensure that this ribbon of land use contain controls to ensure that industrial impacts can be (ideally) avoided, or if unavoidable mitigated or managed. An option to do this could be to designate preferred and non-preferred land uses, based on the principle of separating incompatible development forms from one another.

Rowley Road

Rowley Road is identified as a primary freight road by the Western Australian Planning Commission. This reflects particularly its servicing of east west traffic, but also its function for supporting the development of this planned industrial precinct. The proposed Stage 2 Structure Plan will generate significant traffic impacts and increased traffic volumes on Rowley Road, which cannot be accommodated under the current infrastructure extent. The Shire also raises safety concerns pertaining to the current Rowley Road / Nicholson Road intersection, which is a documented blackspot, and which has been earmarked for upgrading but currently is impacted by funding shortfalls. The abutting sections of Rowley Road should be required to be upgraded as part of the Structure Plan, as well as the intersection with Nicholson Road. Should the intersection be unable to be upgraded, the Structure Plan would be considered premature until such time that the uncertainty for how this intersection will be upgraded, is removed.

Figure 1: Proposed areas that require further infrastructure and upgrades to accommodate the future use.



Blair Road Intersection

The proposed road network integrates different land use zones by virtue of the draft road design depicting an intersection with Blair Road. Based on the adopted Subregional Frameworks, there is no proposed integration of these zones, with the Shire's strategic planning framework maintaining a Rural Residential interface commensurate with the regional strategic plan for Perth and Peel. It is therefore recommended that this full movement intersection be shifted east to coincide with the Western Power easement, or proximate location to that. Such shifting will place what is likely a major noise and traffic generating intersection to a point whereby sensitive development is already separated by virtue of the influence of the Western Power easement.

Transport and Industrial Noise Impacts

It is noted that the proposed Structure Plan has not been assessed against State Planning Policy 5.4 Road and Rail Noise (SPP5.4). The Shire considers it necessary that the proposal is assessed against SPP5.4. Consideration to increased transport noise received at sensitive receptors (residential dwellings) within the 200 metre SPP 5.4 trigger distance of Rowley Road is required. The Transport Impact Assessment (TIA) prepared by Shawmac August 2024 for the proposed Stage 2 Structure Plan estimates at full build out, the Industrial Area including the first Stage 1 'Warehouse' site would ultimately generate traffic flows of 18,167 vehicles per day (vpd). Further consideration must also be given to trucks generating high levels of noise on acceleration and deceleration into the area. Rowley Road is identified as a strategic freight/major traffic route by the Department of Planning Lands and Heritage pursuant to SPP5.4. The Structure Plan is therefore required to be supported by a Transport Noise Impact Assessment, prepared in accordance with SPP5.4, with the purpose to assess the extent of transport noise impacts generated by vehicles accessing the proposed development.

Sensitive receivers abutting the industrial area must be protected in full by the Environmental Protection (Noise) Regulations 1997. There is currently no information provided to address noise generated from the industrial area. There are no measures suggested to buffer impacts from the industrial area to the rural residential areas to the south of Rowley Road that abut the proposed Stage 2 development and City of Armadale border.

It is recommended that an Environmental and Transport Noise Impact Assessment is prepared for the Structure Plan Stage 2, to demonstrate that noise impacts associated with the future stages of the industrial development can be managed and allow for suitable planning outcomes. This Environmental and Transport Noise Impact Assessment should outline appropriate measures to ensure the amenity of the nearby residential properties is protected.

Should you require and further information, please do not hesitate to contact Lloyd Skinner on 9526 1111 or at lskinner@sjshire.wa.gov.au.

Yours faithfully



Andrew Trosic
Director Development Services