

NEW SUMMARY OF SUBMISSIONS
Serpentine Townsite Local Structure Plan
SJ993-02

Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
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Government Agencies

DMIRS IN21/3224	1.	The Department of Mines, Industry Regulation and Safety (DMIRS) has determined this proposal raises no significant access issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.	Noted.	
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DPLH IN21/3876	2.	<p>SERPENTINE GENERAL STORE</p> <p>Under the provisions of Section 73 of the <i>Heritage Act 2018</i>, the proposal as described below has been referred to the Heritage Council for its advice.</p> <p>Place Number P3866 Place Name Serpentine General Store Street Address 6 Wellard Street, Serpentine Referral date 28 January 2021 Proposal Description Serpentine Townsite Local Structure Plan</p> <p>We received the following document:</p> <p>Serpentine Townsite Local Structure Plan, January 2021</p> <p>The proposal has been considered in the context of the identified cultural heritage significance of <i>Serpentine General Store</i> and the following advice is given:</p> <p>Findings</p> <ul style="list-style-type: none"> Heritage is recognised as a main design principle in the Serpentine Townsite Local Structure Plan, which is a positive aspect. We would also recommend including State Planning Policy 3.5: Historic Heritage Conservation at Section 1.3.3 State Policies and Guidelines. The State Registered Heritage Place <i>Serpentine General Store</i> is located within the draft Local Structure Plan area as part of the Neighbourhood Centre, which will function as a 'main street'. As a zoning that allows for continuation of retail use, this will assist in retaining the place's cultural heritage significance. Design Guidelines for Serpentine Townsite should include provisions for the Neighbourhood Centre, to ensure new development does not impact negatively on the cultural significance of <i>Serpentine General Store</i>. 	<p>Noted.</p> <p>State Planning Policy 3.5: Historic Heritage Conservation is recommended to be included under section 1.3.3.</p> <p>The following sentence is recommended to be amended to remove reference to the State Heritage Register - '<i>The historic nature of Serpentine is reflected by the number of properties which are listed on the State Heritage Register.</i>'</p>	<p>Part 2, Section 1.3.3 – Include State Planning Policy 3.5: Historic Heritage Conservation under section 1.3.3.</p> <p>Part 2, Section 2.6 – Amend the following text to state: '<i>The historic nature of Serpentine is reflected by the number of properties with heritage significance.</i>'</p>

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		<ul style="list-style-type: none"> The sentence "[t]he historic nature of Serpentine is reflected by the number of properties which are listed on the State Heritage Register" is not borne out, as there is only one place in the State Register in the Serpentine Townsite. Furthermore, the other heritage places referred to in the LSP are not included in the Shire's Heritage List, but are in the Local Heritage Inventory and as such not protected by the Town Planning Scheme. <p>Advice The proposal, in accordance with the plan submitted, is supported.</p> <p>Please be reminded that you are required under r.42(3) of the <i>Heritage Regulations 2019</i> to provide us with a copy of the determination within 10 days after making the decision.</p>		
DPIRD IN21/4508	3.	The department of Primary Industries and Regional Development (DPIRD) does not object to the proposed Serpentine Townsite Local Structure Plan as this area has previously been identified for this purpose.	Noted.	
DPLH IN21/4991 IN21/5462	4.	I have reviewed the Aboriginal Heritage Register of Places and Objects as well as the DPLH Aboriginal Heritage database. The results indicate that the proposed works do not intersect with the boundary of any Aboriginal sites or heritage places. Therefore, the proponent should be advised that no approvals under the Aboriginal Heritage Act 1972 are required.	Noted.	
DWER IN21/5167	5.	The Department has reviewed the reports provided, with particular reference to the <i>Serpentine Townsite Local Water Management Strategy Addendum</i> (Urbaqua, 2020). Attachment 1 to this letter provides comments for your consideration. The attached comments, and any requirements from the Shire of Serpentine-Jarrahdale, should be addressed within a revised LWMS	Noted. Urban Water Management Plans (UWMPs) will be required at subdivision stage to address water	Local Water Management Strategy – Update the Local Water Management Strategy to the satisfaction of the

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		<p>Addendum and resubmitted to both agencies.</p> <p>A local structure plan is required to be supported by an endorsed LWMS consistent with <i>Better Urban Water Management (WAPC, 2008)</i> and <i>State Planning Policy 2.9 – Water Resources</i>. Water resource issues for this site have the potential to impact lot yield and configuration and as such, consistent with the aforementioned policy, the structure pan should not be adopted prior to the resolution of the LWMS.</p> <p>Attachment 1 - Department of Water and Environmental Regulation comments on <i>Serpentine Townsite Local Water Management Strategy Addendum</i> (Urbaqua, 2021)</p> <p>Contact for further information: Jane Sturgess on 9550 4228</p> <table><tr><td></td><td></td><td>Date received</td><td>Date of comments</td></tr><tr><td>Rev 1</td><td></td><td>16/12/2020</td><td>23/02/2021</td></tr><tr><td>Rev 2</td><td></td><td></td><td></td></tr></table> <table><tr><th>No.</th><th>Page</th><th>Section</th><th>Rev 1 - DWER Comments</th><th>Rev 1 – Author's Actions</th></tr><tr><td>1</td><td>6</td><td>3.4 Commitment to best management practice</td><td>Proposed new areas of development, as well as existing areas that have the opportunity to be retrofitted, should include current best practice water quality improvement measures and infiltration higher in the catchment utilising roadside rain gardens, median swales and tree pits.</td><td></td></tr><tr><td>2</td><td>10</td><td>5.5 Wastewater</td><td>It is acknowledged that the townsite was previously zoned for urban use and as per <i>Government Sewerage Policy</i> (DPLH, 2019), the site is within a sewerage sensitive area. Therefore the wastewater systems are to be secondary treatment with nutrient removal. In addition, the effluent disposal areas shall address setback requirements to water resources (groundwater and surface water), and the disposal areas and location indicated on a plan. This can be updated in the future urban water management plan (UWMP).</td><td></td></tr><tr><td>3</td><td>13</td><td>6.3.1 Proposed Stormwater Management Strategy</td><td>Please include cross-section plans illustrating the proposed drainage infiltration areas (including retention basins and living stream) indicating critical invert levels. Also include conceptual plans with landscape treatments which can be updated in the future UWMPs.</td><td></td></tr><tr><td>4</td><td>13</td><td>6.3.2 Stormwater Volumes and Rates</td><td>This section has been revised to discuss the treatment of the first 15mm rainfall events including the use of bioretention basins, swales and underground storage. Please indicate in figure 2 where these treatment areas will be located as well as concept plans of these treatment measures (as discussed at comment 3). This can be updated in future UWMPs.</td><td></td></tr><tr><td>5</td><td>14</td><td>Figure 2 – Revisions to the Stormwater</td><td>It is unclear how the drainage infrastructure towards the southern areas of the development interfaces with each other (ie along Rudall Street near Arnold Road as well as proposed new road between Lefroy Street and Rudall</td><td></td></tr></table>			Date received	Date of comments	Rev 1		16/12/2020	23/02/2021	Rev 2				No.	Page	Section	Rev 1 - DWER Comments	Rev 1 – Author's Actions	1	6	3.4 Commitment to best management practice	Proposed new areas of development, as well as existing areas that have the opportunity to be retrofitted, should include current best practice water quality improvement measures and infiltration higher in the catchment utilising roadside rain gardens, median swales and tree pits.		2	10	5.5 Wastewater	It is acknowledged that the townsite was previously zoned for urban use and as per <i>Government Sewerage Policy</i> (DPLH, 2019), the site is within a sewerage sensitive area. 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With regard to wastewater management, a Site and Soil Evaluation will be required to be provided to address the site capability for on-site wastewater systems at subdivision stage in accordance with the Government Sewerage Policy 2019.</p>	<p>Department of Water and Environmental Regulation and the Shire of Serpentine Jarrahdale.</p>
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Water Corporation IN21/5310	6.	<p>Reticulated water is currently available to the subject area. All water main extensions, if required for the development site, must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.</p> <p>Wastewater</p> <p>As detailed in the proposed Local Structure Plan, the subject area falls outside a planned sewerage catchment.</p> <p>Drainage</p> <p>The subject area falls within the Hardies Creek Main Drainage Catchment in the Mundijong Drainage District, a rural drainage system.</p> <p>The Corporation has no objections the Local Water Management Strategy (LWMS), Appendix 1 of the Local Structure Plan, based on the below comments being incorporated into the LWMS.</p>	<p>Noted.</p> <p>Amend the Local Water Management Strategy to make it clear that while the Shire acknowledges that it may be best placed to take on asset responsibility of Rural District Drainage Infrastructure, this is subject to such infrastructure being ultimately designed and configured in a way which provides a viable asset for efficient management in accordance with the</p>	<p>Amend the Local Water Management Strategy to make it clear that while the Shire acknowledges that it may be best placed to take on asset responsibility of Rural District Drainage Infrastructure, this is subject to such infrastructure being ultimately designed and configured in a way which provides a viable asset for efficient management in accordance with the</p>																									

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DFES IN21/5312	7.	<p>I refer to your letter dated 28 January 2021 regarding the submission of a Bushfire Management Plan (BMP) (Revision C), prepared by Lush Fire and Planning and dated 10 February 2020, for the above proposal. The BMP is accompanied by the 'Serpentine Townsite Local Structure Plan'.</p> <p>These comments relate only to <i>State Planning Policy 3.7 Planning in Bushfire Prone Areas</i> (SPP 3.7) and the <i>Guidelines for Planning in Bushfire Prone Areas</i> (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with all other relevant planning policies and building regulations where necessary. This advice does not exempt</p>	<p>Noted.</p> <p>Bushfire Management Plans will be required to be provided at subdivision stage to address the detailed design.</p>	

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		<p>the proponent from obtaining necessary approvals that may apply to the proposal including planning, building, health or any other approvals required by a relevant authority under other written laws.</p> <p>General Comments</p> <p>High level consideration of bushfire risk is one of the most effective means of preventing inappropriate development in bushfire prone areas. DFES notes the structure plan area is zoned Urban in the MRS and Urban Development in the TPS.</p> <p>DFES urges the Shire of Serpentine Jarrahdale to ensure that further consideration is given to the bushfire protection at subsequent planning stages to reduce the vulnerability of dwellings and residents from the impact of a bushfire, and to ensure continued compliance with SPP 3.7 and the Guidelines.</p> <p>The following assessment is intended to guide subsequent planning stages.</p>		

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		<p>Assessment</p> <p>1. Policy Measure 6.3 a) (ii) Preparation of a BAL Contour Map</p> <table><tr><th>Issue</th><th>Assessment</th><th>Action</th></tr><tr><td>Vegetation classification</td><td><p>DFES acknowledge the Conservation Category Wetland (CCW) buffer and revegetation requirements are yet to be determined. The BMP depicts areas proposed for future residential land adjacent to the CCW, that may be impacted by BAL-40 / BAL-FZ.</p><p>As the CCW buffer areas are subject to change, DFES recommends provision of adequate hazard separation to ensure no areas of 'residential' zoned land is located in areas of BAL-40 / BAL-FZ.</p></td><td><p>Modifications to the BMP is required at subsequent planning stages.</p></td></tr><tr><td>Vegetation classification</td><td><p>The BMP assumes areas of POS located with the structure plan area will be established and or maintained by the Shire as low threat vegetation as per AS 3959. Evidence to support the exclusion of POS areas as established and managed to low threat in accordance with AS 3959 is required.</p><p>If unsubstantiated, the vegetation classification should be revised to consider the vegetation at maturity as per AS 3959, or the resultant BAL ratings may be inaccurate.</p></td><td><p>Modification required at subsequent planning stages.</p></td></tr></table>	Issue	Assessment	Action	Vegetation classification	<p>DFES acknowledge the Conservation Category Wetland (CCW) buffer and revegetation requirements are yet to be determined. The BMP depicts areas proposed for future residential land adjacent to the CCW, that may be impacted by BAL-40 / BAL-FZ.</p> <p>As the CCW buffer areas are subject to change, DFES recommends provision of adequate hazard separation to ensure no areas of 'residential' zoned land is located in areas of BAL-40 / BAL-FZ.</p>	<p>Modifications to the BMP is required at subsequent planning stages.</p>	Vegetation classification	<p>The BMP assumes areas of POS located with the structure plan area will be established and or maintained by the Shire as low threat vegetation as per AS 3959. Evidence to support the exclusion of POS areas as established and managed to low threat in accordance with AS 3959 is required.</p> <p>If unsubstantiated, the vegetation classification should be revised to consider the vegetation at maturity as per AS 3959, or the resultant BAL ratings may be inaccurate.</p>	<p>Modification required at subsequent planning stages.</p>		
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		and the applicant be advised that these modifications be undertaken to support subsequent stages of the planning process (subdivision & development applications).		
DoT IN21/5423	8.	<p>The Department of Transport (DoT) has reviewed the submitted documentation and provides the following comments:</p> <ul style="list-style-type: none"> The proposed Serpentine Townsite Local Structure Plan page 35 discusses cycle routes and requires updated wording: <ul style="list-style-type: none"> <i>The Long Term Cycling Network Plan was endorsed by the Shire of Serpentine-Jarrahdale on 20 April 2020 and identifies aspirational cycle routes within the Local Structure Plan area, including on Karnup Road, Wellard and Lefroy Streets. This will provide good cycle linkages to the neighbourhood centre, school and community facilities as well as the proposed residential lots to the north of the neighbourhood centre and should be incorporated into the structure plan. An extension of the proposed cycle network to incorporate the new proposed road network to the south of the structure plan should be included to ensure a complete and connected cycle network for the town. Bicycle access in the LSP area is to be in accordance with the Shire's Local Area Bicycle and Shared Path Plan.</i> The Transport Assessment (TA) is dated (2013) and more recent volume and crash data may be available for analysis. There are several four-way intersections in the structure plan area including Lefroy Street/Tonkin Street, Wellard Street/Lefroy Street, Karnup Road/Lefroy Street, and Maxwell Street/Wellard Street. As development occurs, or as traffic volumes increase, the form of control at these intersections may require review to improve 	<p>Noted.</p> <p>Update the discussion of cycle routes under Section 3.2.1 to state:</p> <p><i>'The Long Term Cycling Network Plan was endorsed by the Shire of Serpentine-Jarrahdale on 20 April 2020 and identifies aspirational cycle routes within the Local Structure Plan area, including on Karnup Road, Wellard and Lefroy Streets. This will provide good cycle linkages to the neighbourhood centre, school and community facilities as well as the proposed residential lots to the north of the neighbourhood centre and should be</i></p>	<p>Part 2, Section 3.2.1 – Amend text to state:</p> <p><i>'The Long Term Cycling Network Plan was endorsed by the Shire of Serpentine-Jarrahdale on 20 April 2020 and identifies aspirational cycle routes within the Local Structure Plan area, including on Karnup Road, Wellard and Lefroy Streets. This will provide good cycle linkages to the neighbourhood centre, school and community facilities as well as the proposed residential lots to the north of the neighbourhood centre and should be incorporated into the</i></p>

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		<p>safety. The proposed intersection at Wellard Street/Karnup Road/Rudall Street may also require review.</p> <ul style="list-style-type: none"> Consider sealing any unsealed roads within the Local Structure Plan area. 	<p><i>incorporated into the structure plan. An extension of the proposed cycle network to incorporate the new proposed road network to the south of the structure plan should be included to ensure a complete and connected cycle network for the town. Bicycle access in the LSP area is to be in accordance with the Shire's Local Area Bicycle and Shared Path Plan.'</i></p> <p>Detailed road and intersection planning and design will occur at subdivision stage.</p> <p>Officers recommend that the Transport Impact Assessment (TIA) be updated to reflect the most up-to-date information available and</p>	<p><i>structure plan. An extension of the proposed cycle network to incorporate the new proposed road network to the south of the structure plan should be included to ensure a complete and connected cycle network for the town. Bicycle access in the LSP area is to be in accordance with the Shire's Local Area Bicycle and Shared Path Plan.'</i></p> <p>Transport Impact Assessment – Update the Transport Impact Assessment (TIA) to reflect the most up-to-date information available and the changes which have occurred to the planning</p>

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			the changes which have occurred to the planning framework and road network since 2013.	framework and road network since 2013.

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Department of Education IN21/5602	9.	<p>Thank you for your letter dated 28 January providing the Department of Education (Department) with the opportunity to comment on the draft Serpentine Townsite Local Structure Plan (LSP). The Department has reviewed the information submitted in support of the LSP and wishes to make the following comments:</p> <p><u>Serpentine Primary School</u> The LSP falls within the local intake area for Serpentine Primary School and would generate approximately 39 additional public primary school aged students. The Department's current projections indicate that there would be sufficient enrolment capacity at Serpentine Primary School to accommodate for the number of additional primary school aged students yielded from the LSP.</p> <p><u>Byford Secondary College</u> The LSP falls within the local intake area for Byford Secondary College (BSC) and would generate approximately 31 additional public secondary school aged students. Student enrolments for the school are expected to exceed the built capacity by 2023. Additional numbers within the Serpentine Townsite will therefore exacerbate the future enrolment demand projected for the school.</p> <p>Whilst these numbers present some level of concern, it is expected that there will be enrolment relief offered to BSC in the future. One additional secondary school site has been identified within the draft Byford District Structure Plan and two additional sites have been identified within the draft Mundijong District Structure Plan. The Serpentine Townsite is likely to fall within the future local intake area for one of the two proposed secondary schools in Mundijong. The Department therefore offers no objections to the dwelling yield proposed within the LSP.</p> <p>Notwithstanding the in principle support for the LSP, the Department wishes to reiterate its concerns in relation to the proposed shortfall in public primary school sites identified within the draft Byford and Mundijong District Structure Plans. The Department will monitor the situation as Local Structure Planning and subsequent development in the area continues to progress. The Department will continue to liaise with the Shire of Serpentine Jarrahdale, the Department of Planning, Lands and Heritage and developers/land owners to ensure that suitable outcomes are secured in the future.</p>	<p>Noted.</p> <p>The Shire will continue to work with the Department of Education to ensure that sufficient primary and secondary schools are provided to meet demands.</p>	
Main Roads WA	10.	Main Roads does not support the proposal for the reasons outlined below:	Noted.	Transport Impact Assessment –

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IN21/5637		<ul style="list-style-type: none"> • The Transport Assessment (Appendix 2) prepared by Opus International Consultants and dated 6 September 2013 does not accurately represent or consider the design and land use elements of the proposed Serpentine Townsite Local Structure Plan. There are significant discrepancies between the area for key land uses, estimated total lot yield and estimated residential site density as set out in the Transport Assessment (2013) and the Serpentine Townsite Local Structure Plan. • Main Roads key considerations when assessing such proposals relate to access; traffic lights; function and capacity of the road network; and pedestrian/vehicular conflicts. Based on the information presented in the Transport Assessment (2013) a determination cannot be made of the impact that the proposal will have on the operation and function of the state road network. • A revised and robust TIA is required in accordance with the Western Australian Planning Commission's (WAPC) <i>Transport Impact Assessment (TIA) Guidelines (2016)</i>. This information will allow Main Roads to understand the anticipated impact of the proposed land uses and ensure the TIA accurately reflects the planning context of the proposed local structure plan. <p>The following matters are to be addressed in the TIA:</p> <p>1. Absence of SIDRA files SIDRA files in Version 9 are required for review. A TIA is incomplete, without this data.</p> <p>2. Updated ROM Data Use of up to date ROM data is required to effectively forecast and model</p>	<p>Officers recommend that the Transport Impact Assessment (TIA) be updated to reflect the most up-to-date information available and the changes which have occurred to the planning framework and road network since 2013.</p>	<p>Update the Transport Impact Assessment (TIA) to reflect the most up-to-date information available and the changes which have occurred to the planning framework and road network since 2013.</p>

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		<p>growth rates. The growth rates presented in the Transport Assessment (2013) are now superseded. Consideration of the latest forecast volumes to model growth and development yield anticipated by the local structure plan is likely to alter the TIA outcomes and potential road upgrades that maybe necessitated. ROM data is freely available upon request from Main Roads.</p> <p>Furthermore, this data will also be required as an input for any future noise assessment undertaken in accordance with the WAPC's <i>State Planning Policy 5.4 – Road and Rail Noise (SPP 5.4)</i> to inform future development requirements along major transport corridors to ameliorate the impact of transport noise. This is of particular relevance given that the Perth-Bunbury railway line directly abuts the western boundary of the local structure plan area.</p> <p>3. Trip Generation Reconsideration of the trip generation rates is required and source data must be appropriately referenced (e.g. Institute of Transport Engineers Trip Generation Manual ITE (Land Use Code) or RMS Guide to Traffic Generating Development (section reference and date). The South Western Highway and Karnup Road intersection will be the key eastern gateway to the local structure plan area. Consideration of the impacts of the generated trips associated with the local structure plan on this intersection is necessary. Whilst it may be possible that traffic flows at this intersection with the generated trips of the fully developed structure plan do not present any efficiency issues, there may be safety issues in the absence of turning pocket lanes. To this end, a turning treatment assessment is warranted.</p> <p>Supporting information on the standards for determining turning treatments</p>		

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		<p>can be found on the Main Roads website > Technical & Commercial > Road Traffic Engineering > Guide to Road Design > mrwa-supplement-to-austroads-guide-to-road-design-part-4.</p> <p>As per previous correspondence, the South Western Highway is a Primary Regional Road and on this basis, Main Roads discourages additional access points or modifications to the state road network. Any such proposal will require consultation with, and the approval of Main Roads.</p> <p>4. Trip Rates The trip rates prescribed in the updated <i>TIA Guidelines (2016)</i> should be utilised to calculate traffic generation</p> <p>5. Future Access Strategy The closure of Arnold Road to through traffic as presented in the Transport Assessment (2013) is likely to be inconsistent with the extent of residential development proposed adjacent to the southern boundary of the local structure plan area. Future improvements to Arnold Road are likely to be required, particularly in accordance with the local development plan/s to facilitate the development of Lot 98 and Lot 106 Arnold Street. The revised TIA is to consider the impact on the road network of development proposed in the southern portion of the local structure plan area.</p> <ul style="list-style-type: none"> • Consideration of the land use planning and infrastructure framework for the South Metropolitan Peel sub-region as identified in WAPC's <i>Perth and Peel @3.5 Million, The Transport Network</i> is recommended. It is noted that this framework identifies that by 2050, the Kwinana Freeway and Tonkin Highway will provide the main network for the north-south road movement within the sub-region. • Main Roads considers the grounds outlined above to be consistent with previous traffic and transport related submissions made to the Shire in 		

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		<p>response to structure planning projects for the local government area. The submission of up to date and robust TIAs is necessary to undertake a comprehensive assessment of the impact that such proposals will have on the operation and function of the state road network.</p> <p>Main Roads extends the opportunity to the Shire to work collaboratively through the comments provided to achieve proper and orderly long term planning outcomes.</p> <ul style="list-style-type: none"> • Notwithstanding the above, the Shire is commended on its planning initiative as outlined in the local structure plan <i>to facilitate a well connected, highly legible movement network, which encourages permeability and the development of a walkable neighbourhood (s6.4.3 of the Serpentine Townsite Local Structure Plan).</i> • Main Roads encourages promoting cycle and pedestrian infrastructure within the local structure plan area to provide safe and legible linkages to the neighbourhood centre, school, community facilities and residential lots. <p>On a final note, Main Roads advises that it offers a free of charge pre-lodgement consultation service. Main Roads encourages the Local Government in both liaising with applicants and in pursuing strategic planning projects to promote and capitalise on this free advisory service offered by the road authority prior to lodgement of strategic or statutory planning proposals, especially where development plans involve land adjacent to or have the potential to impact on the State road network. Further information on the pre-lodgement consultation process can be found on Main Roads website at mainroads.wa.gov.au > Technical & Commercial > Planning & Development</p> <p>Should the City disagree with the above advice, as stated above, Main Roads requests an opportunity to meet and discuss the proposal further,</p>		



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		<p>prior to a final determination being made.</p> <p>Main Roads requests a copy of the City's final determination on this proposal to be sent to planninginfo@mainroads.wa.gov.au quoting the file reference above.</p>		
<p>Department of Health</p> <p>IN21/6472</p>	11.	<p>The DOH provides the following comment:</p> <p>1. Water Supply and Wastewater Disposal The development is required to connect to scheme water and reticulated sewerage (where available) and be in accordance with <i>the Government Sewerage Policy 2019</i>.</p> <p>For non-scheme water connected areas, the development is to have access to a sufficient supply of potable water that is of the quality specified under the <i>Australian Drinking Water Quality Guidelines 2011</i>.</p> <p>For non-sewered areas, suitable provision for an adequate onsite effluent disposal area is to be accommodated in any planning approval. For on-site wastewater disposal systems to be approved, the site capability needs to be demonstrated via a winter 'site-and-soil evaluation' (SSE) in accordance with Australian Standard 1547 (AS/NZS 1547). Please use the updated version available for download at: https://ww2.health.wa.gov.au/Articles/S_T/Site-and-soil-evaluation-for-onsite-wastewater-management</p> <p>2. Public Health Impacts DOH has a document on 'Evidence supporting the creation of environments that encourage healthy active living' which may assist you with planning elements related to this structure plan. A copy is attached or may be downloaded from: https://ww2.health.wa.gov.au/Articles/F_I/Health-risk-assessment</p>	<p>Noted.</p> <p>Scheme water is available to the majority of the Local Structure Plan area. Where the subdivision of land not connected to scheme water is proposed, the landowner(s) shall be required to service all proposed lots with scheme water as a condition of subdivision.</p> <p>A Site and Soil Evaluation is recommended to be required at subdivision stage. Part 1 Section 7.1 and Part 2 Section 3.3.3 is recommended to be modified to include that a Site and Soil Evaluation</p>	<p>Part 1, Section 7.1 – Include a Site and Soil Evaluation to the list of investigations and management plans.</p> <p>Part 2, Section 3.3.3 – Include that a Site and Soil Evaluation is required to be submitted as a part of a subdivision application.</p>

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		<p>The structure plan should be consistent with climate change adaption methods to deal with potential health hazards such as extreme heat. The guide <i>Heatwave Guide for Cities</i> is intended to be a basic introduction to this topic and a resource for cities to start planning for extreme heat. Download from: https://www.climatecentre.org/downloads/files/IFRCGeneva/RCCC%20Heatwave%20Guide%202019%20A4%20RR%20ONLINE%20copy.pdf</p> <p>The proposal is located in an area that may be prone to mosquitoes as wetlands are in the vicinity. Stormwater management infrastructure such as culverts, road drainage systems, etc. should be in accordance with the Department of Water publication <i>Stormwater Management Manual for Western Australia</i>, to the satisfaction of the local government http://www.water.wa.gov.au/data/assets/pdf_file/0020/4772/44217.pdf Additional information on mosquito management may be downloaded from: http://www2.health.wa.gov.au/Articles/J_M/Mosquito-management</p>	<p>should be provided at subdivision stage. This aligns with the requirements of the Government Sewerage Policy 2019.</p>	

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		 <p style="text-align: center;">Evidence supporting the creation of environments that encourage healthy active living</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>This evidence brief summarises the literature supporting the creation of environments that encourage healthy active living. It is designed to be used by State and Local Governments and developers, seeking to create new or redevelop existing neighbourhoods. It is structured according to six key components of urban development, and includes a rationale for action and a summary of the key design elements that have demonstrated effectiveness in increasing healthy active living.</p> </div> <p>The way in which our neighbourhoods and cities are designed can have a profound impact on the degree to which people can live healthy lifestyles (particularly in relation to active living and access to fresh and healthy food). Creating supportive built environments is well recognised as a means of improving health and wellbeing, whilst also contributing to a reduction in traffic congestion and parking problems, and improved social and environmental outcomes.</p> <p>The Department of Health supports the incorporation of healthy design elements into urban development that encourage healthy active living. Design elements that are supported by current evidence are described below. Further information on each design element and the evidence base supporting these can be found at www.healthyactivebydesign.com.au</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Mixed Land Use</p> <p>The location of different land uses and destinations relative to each other has a large impact on how accessible they are and how people travel to and between different places¹. A good land use mix enables residents to fulfil a variety of daily activities where they live, work and play (e.g. shopping precincts, schools, employment, community spaces, recreation facilities and open spaces). The more of these land uses and destinations that exist within walking distance, the more likely residents are to walk, cycle or use public transport to get to those places^{2,3}.</p> <p>Convenient access to fresh and healthy food can improve healthy eating⁴⁻⁶. Land use planning can impact on all parts of the 'paddock to plate' food chain (growing/producing, processing, transporting, distributing and selling food) which in turn affects the supply, access and cost of fresh and healthy food for the community⁷⁻⁹.</p> <p>Design Elements</p> <ul style="list-style-type: none"> • Developments should have a compact mix of land uses and groupings of destinations within walking distance of most residents^{3,10-15}. Key destinations include retail, fresh and healthy food outlets, public open space, services, sport and recreation, local employment, schools, and community facilities. • To ensure the availability and accessibility of fresh and nutritious food, arable land needs to be protected and appropriate land should be available for the production, storage, distribution and transportation of food^{11,16}. On a smaller scale, vacant public land, parks and streetscapes can be used to provide local opportunities to produce locally grown fruit and vegetables. </div> 		

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DBCA IN21/8373	12.	<p>Threatened Flora Populations of the threatened flora species <i>Synaphea sp. Pinjarra Plain</i> (Commonwealth Critically Endangered and State Endangered), <i>Synaphea sp. Serpentine</i> (State and Commonwealth Critically Endangered), <i>Synaphea sp. Fairbridge Farm</i> (State and Commonwealth Critically Endangered), <i>Tetraria australiensis</i> (State and Commonwealth Vulnerable) are located within Lambkin Nature Reserve and Bush Forever Site 375.</p> <p>A detailed survey for threatened species in the LSP area has not been undertaken. Ideally surveys for threatened species would be undertaken at the structure planning stage of planning. However, it is noted that the LSP outlines that the majority of vegetation in the LSP area is degraded to completely degraded. The LSP report identified that declared rare flora and priority species present in the Bush Forever area and Lambkin Reserve may be present in small pockets of bushland within the LSP area and recommended that all areas of remnant vegetation which are subject to development are surveyed for significant flora and vegetation. The planning system will need to ensure that targeted surveys for threatened flora species are undertaken prior to subdivision or development.</p> <p>Threatened Ecological Communities Occurrences of the threatened ecological community (TEC) SCP 20b – <i>Banksia attenuata</i> and/or <i>Eucalyptus marginata</i> woodlands of the Swan Coastal Plain (State and Commonwealth Endangered) are found on Lambkin Nature Reserve and Bush Forever Site 375 within the LSP area, an occurrence of the TEC SCP 3a <i>Corymbia – Kingia australis</i> woodland on heavy soils (State Critically Endangered and Commonwealth Endangered) is found in the Turner Road reserve, and occurrences of SCP 3b – <i>Corymbia calophylla – Eucalyptus marginata</i> woodlands on</p>	<p>Noted.</p> <p>Areas of remnant vegetation will be required to be surveyed at subdivision and development stages.</p> <p>Section 2.5.1 is recommended to include text to state that the Threatened Ecological Community vegetation within the Turner Road reserve should be protected.</p> <p>Wetland Management Plans will be required to be provided at subdivision stage to address the management requirements for wetland areas and buffers.</p>	<p>Part 2, Section 2.5.1 – Include text which states: ‘<i>The Threatened Ecological Community (TEC) vegetation within the Turner Road reserve should be protected.</i>’</p>

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		<p><i>sandy clay soils of the Southern Swan Coastal Plain (State Vulnerable), and SCP 08. – Herb rich shrublands in clay pans (State Vulnerable and Commonwealth Critically Endangered), occur in Bush Forever Site 375 adjacent to the LSP area.</i></p> <p>Section 2.5.1 of the report identifies that the road reserve in Turner Street supports remnant vegetation which contains a TEC and is of regional significance. However, it is not clear that the structure plan provides for the protection of the TEC vegetation in the Turner Street Road Reserve.</p> <p>Wetlands Lambkin Nature Reserve is mapped as a Conservation category wetland (CCW) on the Geomorphic wetlands (Swan Coastal Plain) dataset (UFI 15002 and UFI 15205), and several areas in the LSP are mapped as Resource Enhancement wetlands (REWs) , including UFI 15204 which adjoins CCW UFI 15205 and Lambkin Nature Reserve.</p> <p>The <i>Detailed Wetland Assessment and Site-Specific Buffer Study</i> (360 Environmental 2019) concluded that a significant portion of REW -UFI 15204 no longer exhibits attributes and values associated with a REW, however there is a patch of vegetation that is considered part of the wetland function area of the CCW UFI 15205. The report suggested a modification of the REW boundary, with part of the REW to be downgraded to Multiple Use (MU) category. The report also suggested a buffer to the revised REW wetland area in association with site management.</p> <p>The wetland assessment outlines that the LSP proposes a POS buffer (approximately 50 metres wide) adjacent to the CCW (UFI 15002) and that</p>		

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		<p>this 50-metre buffer incorporates the proposed buffer to the recommended amended REW 15204 boundary.</p> <p>The proposed 50-metre buffer does not appear to fully incorporate the portion of REW 15204 and buffer recommended in the Wetland assessment and Site-Specific Buffer study. The Environmental Protection Authority (EPA) urges that all reasonable measures are taken to minimise the potential impacts on REW's and appropriate buffers.(Page 2, Chapter B4, <i>Environmental Guidance Statement No 33 -Environmental Guidance for Planning and Development</i>), and that wetlands that are to be protected require a minimum 50 metre buffer distance.(Page 18, Chapter B4 , EPA Guidance Statement 33).</p> <p>Stormwater management infrastructure (including pipes, constructed drains, flood detention areas and vegetated swales) should be located outside of conservation category wetlands and their buffers consistent with the <i>Decision Process for Stormwater Management in WA</i> (DWER, 2017).</p> <p>A wetland management plan for CCW 15002, CCW 15205, and REW 15204 will need to be prepared prior to subdivision to address management requirements for the wetland area and buffer.</p> <p>It is recommended that a formal proposal to modify the wetlands boundaries and management category on the Geomorphic wetland *Swan Coastal Plain) dataset be submitted to DBCA's wetlands section in accordance with 'A methodology for the evaluation of wetlands on the Swan Coastal Plain' (DBCA 2017). This document, in addition to information regarding wetland delineation and identification, can be obtained at</p>		

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		<p>https://www.dpaw.wa.gov.au/management/wetlands/publications-and-links.</p> <p>Matters of National Significance The proponent will need to consider requirements for referral of the proposal to the Commonwealth Department of Agriculture Water and Environment under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> for proposals that may impact Commonwealth listed TEC's, threatened species of flora, and threatened black cockatoo habitat.</p> <p>Interface and Bushfire management The Shire of Serpentine and Jarrahdale should ensure that there is adequate separation for bushfire protection between future development and the CCW and wetland buffer, Bush Forever Site 375, and Lambkin Nature Reserve, and that all bushfire protection requirements are provided within the development land and do not place reliance or impositions on the management of these areas. The provision of a hard road edge between the development and the CCW and buffer as proposed in the LSP is supported.</p> <p>Other Matters 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 Strategy and Urban Water Management Plans adequately provide for the maintenance of the pre-development hydrology of Lambkin Nature Reserve and Bush Forever Site 375 to ensure that the SCP 20b TEC, populations of threatened flora, and the CCW wetland are not impacted.</p>		

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		<p>It is the department's expectation that the planning for the site will seek to retain black cockatoo habitat wherever possible.</p> <p>Kangaroos were not listed in the Environmental Assessment report as being on the site. This should be confirmed because kangaroos displaced from existing habitat may become concentrated on remaining areas, creating animal welfare issues and problems for other property owners, and increasing the risk to road users in the area. An assessment of whether kangaroo management is required should be undertaken early in the planning process.</p>		
Planning Consultants				
Ferraro Planning and Development Consultancy IN21/5363	13.	<p>I refer to the call by the Shire for public submissions on the Serpentine Townsite Local Structure Plan (structure plan). This submission has been prepared on behalf of Ms A Hobson, owner of Lot 15 Giblett Street, Serpentine.</p> <p>Lot 15 is an 'L' shaped lot approximately 10.9ha in size that extends from Karnup Road through to the Serpentine River. Approximately 2.120 ha of Lot 15 has been included within the draft local structure plan. The land included within the structure plan is located adjacent to Karnup Road and between Giblett Street and an existing narrow public open space reserve.</p> <p>Issue 1 – Open Space requirement for Lot 15 Giblett Street</p> <p>Of the 2.120 hectares of Lot 15 affected by structure plan, approximately 9,439m² has been identified to accommodate public open space and a drainage basin (refer to as Spencer Park in the document). This proposed public open space site is rectangular in shape and measures</p>	<p>Noted.</p> <p>The Draft Structure Plan identifies a road reserve adjacent to the western boundary of Lot 15 Giblett Street. This road reserve is identified over the Shire Reserve 43564. The identified road reserve does not provide road access to the adjacent properties, which are accessed from Wundowie Place. Officers recommend that</p>	<p>Amend the structure plan to identify Reserve 43564 as Public Open Space.</p> <p>Amend the structure plan to move the 'Spencer Park' Public Open Space approximately 25m to the west to include Reserve 43564.</p> <p>Amend the structure plan to move the new road reserve at the</p>

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		<p>approximately 75m wide by 147m deep. A road is proposed immediately to the east of the proposed open space, with the balance area of approximately 9,000m² being identified for residential development.</p> <p>In short, the structure plan proposes that Lot 15 accommodate approximately 9,400m² of public open space and drainage; and approximately 9,200m² of residential land, separated by a new road.</p> <p>Section 8 of the structure plan states that individual owners will be responsible for the delivery of public open space at the time of subdivision, stating that owners will be required to provide the open space free of cost.</p> <p>The structure plan is unreasonable and places the owner of Lot 15 at a considerable disadvantage when compared to other landowners in the structure plan area. The structure plan as proposed requires the owner of Lot 15 to contribute approximately 50% of the of Lot 15 within the structure plan area as public open space.</p> <p>Of particular concern, is that the structure plan does not propose, nor recommend any method of cost sharing to enable the fair and equitable distribution of public open space costs. The structure plan fails to address this inequity and proposes an outcome that is well beyond any reasonable application of current public open space contribution policies and practices.</p> <p>Issue 2 – Inefficient Residential layout as it relates to Lot 15 Giblett Street</p> <p>A further concern with the structure plan relates to the area of the</p>	<p>Reserve 43564, which is approximately 25m in width, be identified as POS under the Draft Structure Plan to reflect the current reserve status. Officers recommend that the 'Spencer Park' POS identified on Lot 15 Giblett Street be moved 25m to the west to include the land within Reserve 43564. This would result in a reduction of the POS identified on Lot 15 Giblett Street. Officers also recommend that the new road reserve identified on Lot 15 Giblett Street also be moved 25m to the west. Moving the POS and new road reserve to the west to include Reserve 43564 as POS, would result in additional land being identified as</p>	<p>eastern boundary of the 'Spencer Park' Public Open Space approximately 25m to the west.</p> <p>Amend the structure plan to identify the land between Giblett Street and the road reserve adjacent to the 'Spencer Park' Public Open Space as Residential R5.</p>

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		<p>developable land within Lot 15. The structure plan includes approximately 9,000m² of land for residential purposes. Based on a minimum lot size of 2,000m², the area of Lot 15 included for residential purposes would facilitate the creation of up to four lots.</p> <p>The area identified for residential purposes within Lot 15 should be adjusted to enable five residential lots to be created. This adjustment should occur through the reduction (i.e. narrowing) of the public open space site. Such a modification will result in the more efficient use of land and ensure that the housing targets set in the structure plan can be achieved.</p> <p>Issue 3 – Drainage as it relates to Lot 15 Giblett Street.</p> <p>In response to the recommendations of the Local Water Management Strategy, the structure plan proposes a drainage compensation basin adjacent to the future Spencer Park and within the Lot 15.</p> <p>Currently, storm water from the nearby Wendowie Place flows from the road through a pedestrian access way and onto Lot 15. This has and continues to cause management difficulties for Lot 15; and discussions between the owner and the Shire engineers have not resulted in any workable solutions.</p> <p>Given that the structure plan will make it unviable for Lot 15 to ever be subdivided, it follows that the proposed drainage basin will also not ever be achieved. As a consequence, the issue of temporary or alternate drainage arrangements must be considered and implemented by the Shire.</p>	<p>Residential R5 on Lot 15 Giblett Street. This would result in a more equitable allocation of POS on the subject site.</p>	

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		<p>The structure plan should either be amended or supported by other appropriate documents that provide for workable interim or alternate drainage solution, that can be implemented immediately to ensure that storm water from existing roads is managed properly and does not traverse through private property.</p> <p>Conclusion</p> <p>The purpose of a structure plan is to ensure that the future development of land occurs in an efficient, equitable and cost effective manner. Unfortunately, the structure plan as it relates to Lot 15, achieves none of these objectives.</p> <p>The structure plan places an unrealistic burden on Lot 15 in terms of the provision of public open space, without any means of addressing this inequity. The expectation that a landowner will cede 50% of a developable area for open space without any compensation or payment is unrealistic. If the structure plan is to be finalised as advertised, it is unlikely that Lot 15 will ever be subdivided. This will be further exacerbated, if there is an expectation that the subdivider will also develop the open space.</p> <p>The structure plan should be amended to either:</p> <ul style="list-style-type: none"> a. Reduce the amount of open space on Lot 15 to better reflect the normal 10% contribution rate; or b. Introduce a cost sharing arrangement, where the cost of providing and developing the open space can be shared equitably throughout the structure plan area. 		


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		<p>The structure plan has not taken the 2,000m² minimum lot sizes into consideration when considering boundaries and extent of residential areas. The structure plan should have examined this issue in much more detail, to ensure that lot targets can actually be achieved.</p> <p>The structure plan should be amended to ensure that 2,000m² minimum lots can be achieved without unnecessary land waste. To that effect, the residential area identified for Lot 15 should be amended so that five lots can be created.</p> <p>Finally, drainage solutions have been prepared without any consideration of how these can be staged over the life of the structure plan. Lot 15 is already adversely impacted by storm water generated by the local road network. Given that it is unlikely that Lot 15 will be subdivided in the near or distant future, arrangements need to be put into place to ensure that storm water is effectively managed and not simply allowed to flow unimpeded onto private property. The structure plan should, therefore, be modified to address how storm water will be managed in the interim and until all the required infrastructure is in place.</p> <p>Unless the structure plan is modified to address these issues, it is unlikely that the subdivision of Lot 15 will ever be viable and that the on-going drainage issues are unlikely to be resolved. The structure plan has, therefore, not achieved its purpose and should not be approved unless these above matters are fully addressed.</p>		
Harley Dykstra IN21/5428	14.	The Shire of Serpentine Jarrahdale is currently advertising the proposed Local Structure Plan for the Serpentine Townsite (Serpentine LSP).	Noted. Officers agree that the implementation of the	Amend the structure plan to move the east-west road located at the northern structure

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		<p>In response to this document, Harley Dykstra would like to make a submission, on behalf of our client Pico Bello Holdings, who are the landowners of Lot 12 (No. 100) Richardson Street, Serpentine (the subject site), that seeks an amendment to the proposed road layout surrounding the site.</p> <p>Currently, the advertised Serpentine LSP depicts a road network in the Richardson Street precinct as identified in Figure 1 below, on which we have also highlighted our Clients landholding in blue.</p>	<p>structure plan may be impacted by the fragmented land ownership of land holdings. Officers recognise the implementation issues associated with the proposed alignment of an east-west road on the northern boundary of the structure plan, which traverses the southern portion of Lot 10 Richardson Street.</p> <p>Only the southern portion of Lot 10 Richardson Street is included within the structure plan and with the road identified on this lot, there is little developable residential land on the lot. Lot 10 Richardson Street would be unable to develop independently of Lot 12 Richardson Street, which is located to the south of</p>	<p>plan boundary to be wholly located within Lot 12 Richardson Street at the northern boundary.</p> <p>Amend the structure plan to locate an east-west road equally over Lot 12 Richardson Street and Lot 14 Richardson Street.</p> <p>Amend the structure plan to move the 'North Park' public open space and drainage to be wholly located within Lot 12 Richardson Street.</p>


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		 <p data-bbox="566 1114 1411 1136">Figure 1: "Richardson St Precinct" excerpt from Advertised Serpentine Townsite LSP</p> <p data-bbox="506 1189 1473 1418">This submission requests that the northernmost road (within Lot 10, adjacent to the north of the subject site), be moved wholly into our Clients landholding. It also requests a slight adjustment to the road adjacent to the southern boundary of Lot 12 to ensure appropriate lot sizes can still be achieved. The rationale for this amendment is that there is very little incentive for the landowner of Lot 10 to develop their site, which would have the effect of significantly limiting development on our Clients lot,</p>	<p data-bbox="1503 432 1839 866">Lot 10. Officers agree that there would be little practical way for the landowner of Lot 10 to develop, given small portion of land identified as residential on this lot. Furthermore, Lot 12 Richardson Street will require the road access identified on Lot 10 to enable development to occur.</p> <p data-bbox="1503 906 1839 1414">Officers support relocating the east-west road, currently identified on Lot 10 at the northern structure plan boundary, to the northern boundary of Lot 12. The road would be wholly contained within Lot 12, providing the necessary access to allow Lot 12 to develop independently of Lot 10. This would result in a larger portion of Lot 10 being identified as</p>	

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		<p>because of the following reasons:</p> <ol style="list-style-type: none"> 1. The proposed road, which occurs on the northern perimeter of the LSP area, will traverse right through the dwelling on Lot 10, as evidenced by Figure 2 below, which depicts the location of the dwelling in relation to the Urban Development zone. 2. Given the road and Public Open Space areas on Lot 10 consume a large portion of its developable area, Lot 10 will only be able to accommodate part lots, thereby reducing development incentive even further. <p>Because of these constraints, we propose that the road and adjacent Public Open Space (and drainage basin) be moved entirely into Lot 12. This scenario has been illustrated on a Concept Plan that is attached at Appendix A. The effect of this adjustment will achieve the following outcomes:</p> <ol style="list-style-type: none"> 1. Lot 12 will be able to be entirely developed in its own right, which ensures that development in the LSP Area can occur to the proposed potential. 2. The POS and associated drainage area can easily be ceded and developed as part of the development of Lot 12. In the current proposal this would be contingent on the development of Lot 10, which is unlikely as explained above; and 3. More incentive is provided to the landowner of Lot 10 given the existing dwelling will no longer be impacted by the proposed road, and because entire lots (as opposed to partial) can be developed on that site. 	<p>Residential, which would allow lots to also be created from Lot 10.</p> <p>Given the recommended relocation of the northernmost east-west road further south, officers support moving the other road at the southern boundary of Lot 12 slightly to the south, to ensure appropriate lot sizes can be achieved.</p> <p>An area of POS is also located over both Lot 10 and Lot 12 Richardson Street. Officers agree that the development of this POS may be challenging given the limited amount of residential land identified on Lot 10, resulting in a lack of incentive for Lot 10 to develop. Officers support the relocation of the POS and drainage to</p>	

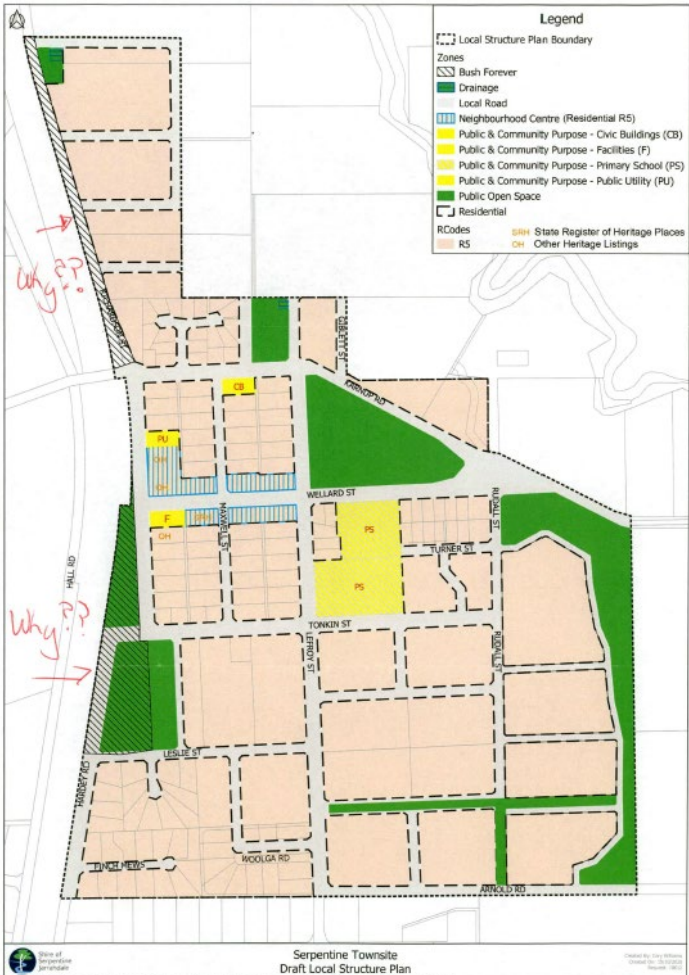
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		 <p style="text-align: center;">Figure 2: Position of Dwelling on Lot 10 (No. 116) in comparison with Urban Development Area</p> <p>Whilst we understand that the likely design motive of the draft LSP was to ensure a hard edge (i.e. road edge) to this particular portion of the Structure Plan area, we reiterate that this would have significant consequence to the developability of Lots 10 and 12 as demonstrated above. For that reason, we request that the Shire consider this statement favourably.</p>	be wholly contained within Lot 12 Richardson Street. This would allow for the POS to be delivered as a part of the development of Lot 12.	
Neighbour				
H. Chambers IN21/3606	15.	Make our town better. Any upgrades are welcome. Making Arnold Street a non-gravel road would be amazing!	<p>Noted.</p> <p>Road upgrades will be required as a condition of future subdivision approval.</p>	

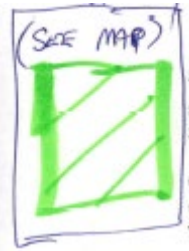
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A. Smith IN21/3816	16.	<p>Lot 94 Tonkin Street Serpentine, Cnr Tonkin and Lefroy Street</p> <p>I am in favour of LSP to go ahead. I have been waiting now for 5 years there is no need to have such large, run down, old properties in the town centre. The town centre has a horrible retirement village feel to it. My property itself is a waste of 5 acres being located across the road from the primary school. My house is also 100 years old. I want the LSP to go ahead so I can build a new establishment on my property and develop the remaining land.</p>	Noted.	
M. Smith IN21/3825	17.	<p>94 Tonkin Street / Cnr Lefroy across from school.</p> <p>Please allow subdivisions and expansion to occur. It may enable a supermarket and other infrastructure to get the Go-Ahead. If the population expands we may get a postie. We are able to shop locally and not travel as far. Needs an upgrade!</p>	Noted.	
R McCamish IN21/3830	18.	<p>Lots 206, 207, 209 Woolga Road</p> <p>I give full support for the Serpentine Townsite Local Structure Plan. Should have been done years ago!</p>	Noted.	
M. Lockwood IN21/4153	19.	<p>Why are you blocking off Richardson Street North when we just spent over a million dollars upgrading the bridge? How do we get to Mundijong? Why would you block off Hardey Road North to create a greater bushfire risk and a longer route to town for those living in Serpentine South West?</p>	<p>Noted.</p> <p>Richardson Street North is not proposed to be closed. The hatching over Richardson Street on the structure plan map indicates a Bush</p>	

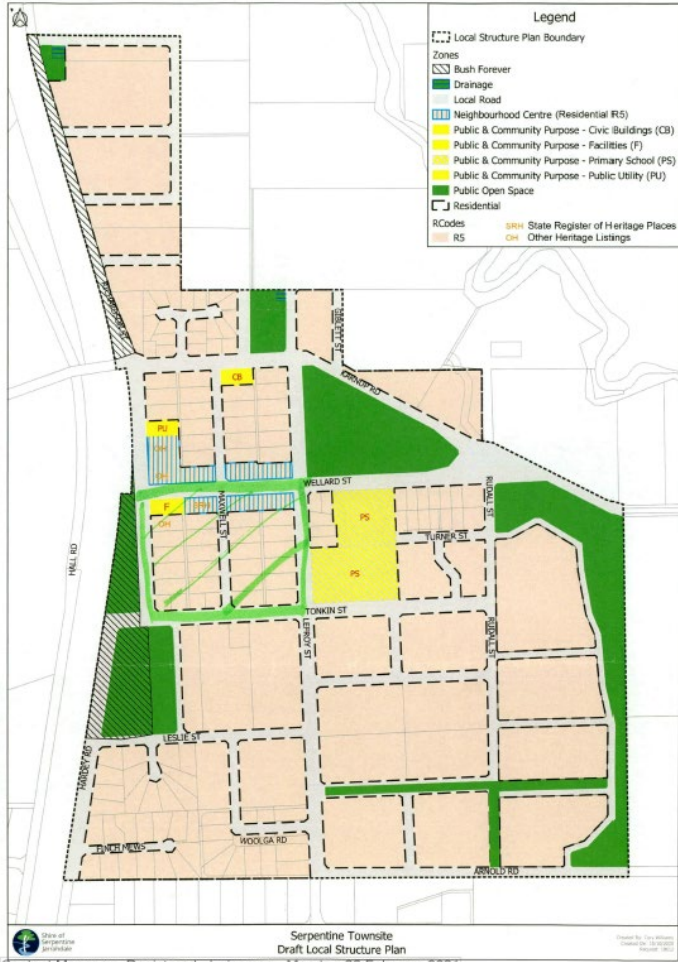
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Submitter	No	Submitter Comments	Officer Comment	Officer Recommendation
		 <p style="text-align: center;">Serpentine Townsite Draft Local Structure Plan</p> <p>Content Manager - Registered - kwiseman - Friday, 12 February 2021</p>	<p>Forever designation. Bush Forever areas are identified under the Metropolitan Region Scheme to protect and manage regionally significant bushland. A Bush Forever designation can occur over a road reserve. These parts of road with the Bush Forever designation are not proposed to be closed.</p>	

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R. Hammond IN21/4585	20.	<p>Submission</p> <ul style="list-style-type: none"> Potential decrease in property value due to: <ol style="list-style-type: none"> Inability to subdivide blocks due to an R5 rating when they have previously been R10 or urban development. Proximity to the suggested neighbourhood centre. Increased vehicle and foot traffic if current residences are converted into businesses under the proposed neighbourhood centre. The increased noise associated with the neighbourhood centre, including visitors and building works, and noise that has the potential to continue into evenings and weekends. 	<p>Noted.</p> <p>The Western Australian Planning Commission required a modification to designate residential land with the density coding of R5.</p> <p>Future developments will be required to manage any potential noise impacts.</p>	
N. Kentish IN21/4994	21.	<p>I agree we need more properties for housing. We also have a requirement for more commercial property. Maxwell/Wellard/Tonkin & Richardson areas could or Lefroy be rezoned for future commercial.</p> 	<p>Noted.</p> <p>Serpentine has been identified as a Neighbourhood Centre under the Shire's Activity Centres Strategy and Draft Local Planning Strategy. The identification of land as 'Neighbourhood Centre' under the structure plan</p>	

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		 <p style="text-align: center;">Serpentine Townsite Draft Local Structure Plan</p> <p>Content Manager - Registered - kwiseman - Monday, 22 February 2021</p>	<p>is aligned with the Shire's activity centre hierarchy and the floor space allocation for the scale of a Neighbourhood Centre.</p>	

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D.G. Brown IN21/5313	22.	<p>Thank you for this opportunity to comment on the planning proposal for the township of Serpentine.</p> <p>I have no objections to the planning proposal as it should benefit the township while still maintaining its country town ambience which is one of the reasons I moved into the district.</p> <p>I will, however, take this opportunity to raise a particular issue related to town planning which should be considered in any future development in the Shire, here I refer to a policy proposal titled the <i>WA Government Position Statement: Dark sky and Astro-tourism</i>.</p> <p>I bring this document to your attention as I am an active recreational astronomer and a nearby landowner. Preserving the darkness of the night sky above Serpentine is not just about satisfying the interest of a small group of like-minded people, but rather it needs to be put in the broader context of providing another means of preserving the district's natural resources whatever their form.</p> <p>Although still in the discussion stage, the Position Statement is particularly pertinent to all suburban/rural transition zones which would include the district of Serpentine. I draw your attention to two key policy objectives outlined in the Statement:</p> <ul style="list-style-type: none"> • preserve and protect the night sky for future generations; and • minimise light and dust pollution. <p>I note that the Position Statement sees a role for local government authorities with regard to decision making to identify dark sky locations,</p>	<p>Noted.</p> <p>Officers acknowledge the importance of protecting dark and night sky locations through limiting light and dust pollution.</p>	

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		<p>buffers and observatories, as well as broad objectives to reduce light and dust pollution.</p> <p>Currently, the low level of light pollution in Serpentine is laudable given the town is only 45kms from Perth's CBD and was allowed to develop and grow during a time when preserving natural resources was not such an imperative as it is today.</p> <p>I trust this short submission will serve to inform the Shire of yet another, and little-known aspect of good town planning.</p>		
K. Kelly E21/2351	23.	<p>We moved to Serpentine 32 years ago loving the fact we were isolated and far enough away from suburbia and the many people and houses and trouble it brings but within 30 minutes to all the amenities needed. We do not need or want to become the next Byford. Serpentine has only 1 primary school, no high school, not enough services or amenities to service the influx of people which suits us fine just the way it is. We love the serpentine that is now.</p> <p>Small, friendly and inclusive we do not need the large farm blocks chopped up into smaller housing developments. That isn't the country feel or town we want.</p>	<p>Noted.</p> <p>The structure plan seeks to preserve the low density rural lifestyle character of the Serpentine Townsite.</p>	
A Waldron E21/2351	24.	<p>A dedicated bike path that leads out of town, provides two benefits a safe place to exercise and keeps bike riders safe and off of roads, such as the road up to the Serpentine falls or on Wright Rd towards Mundijong</p>	<p>Noted.</p> <p>Update the discussion of cycle routes under Section 3.2.1 to state:</p> <p><i>'The Long Term Cycling Network Plan was</i></p>	<p>Part 2, Section 3.2.1 – Amend text to state:</p> <p><i>'The Long Term Cycling Network Plan was endorsed by the Shire of Serpentine-Jarrahdale on 20 April</i></p>


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			<p><i>endorsed by the Shire of Serpentine-Jarrahdale on 20 April 2020 and identifies aspirational cycle routes within the Local Structure Plan area, including on Karnup Road, Wellard and Lefroy Streets. This will provide good cycle linkages to the neighbourhood centre, school and community facilities as well as the proposed residential lots to the north of the neighbourhood centre and should be incorporated into the structure plan. An extension of the proposed cycle network to incorporate the new proposed road network to the south of the structure plan should be included to ensure a complete and connected cycle network for the</i></p>	<p><i>2020 and identifies aspirational cycle routes within the Local Structure Plan area, including on Karnup Road, Wellard and Lefroy Streets. This will provide good cycle linkages to the neighbourhood centre, school and community facilities as well as the proposed residential lots to the north of the neighbourhood centre and should be incorporated into the structure plan. An extension of the proposed cycle network to incorporate the new proposed road network to the south of the structure plan should be included to ensure a complete and connected cycle</i></p>

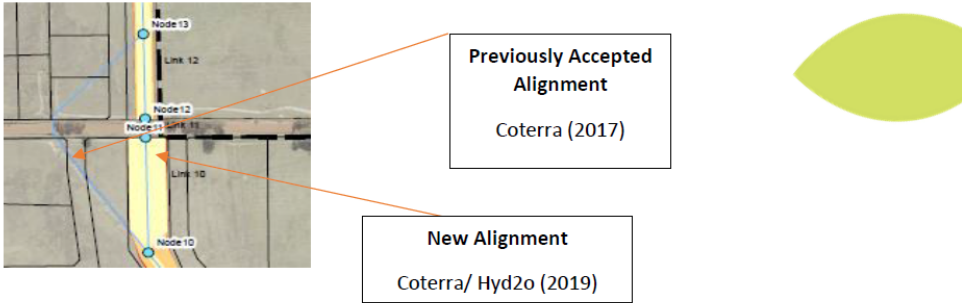
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			<i>town. Bicycle access in the LSP area is to be in accordance with the Shire's Local Area Bicycle and Shared Path Plan.'</i>	<i>network for the town. Bicycle access in the LSP area is to be in accordance with the Shire's Local Area Bicycle and Shared Path Plan.'</i>
R Schmidt E21/2351	25.	Your plan for the area around Turner St is incorrect. It shows Turner St as a straight road, with a new road joining onto it through the Uniting Church grounds. However Turner St is actually curved around a significant flora sight, which actually takes away quite a bit of land from the home owners. It is a Private Road. I'd suggest the Shire actually visit and inspect the area. They never visit the street to do any work, so doubt they know it even exists.	Noted. The structure plan map depicts the existing Turner Road reserve. The Turner Road reserve includes road pavement and the significant vegetation protected within the road reserve.	
B Staltari IN21/5451	26.	Don't object to proposal but the Shire needs to upgrade Utley Road, Rapids South and Punruk Road urgently before any new developments.	Noted.	
Malf Corp Lara Iozzi (nee Spagnolo) IN21/6619	27.	See IN21/6619	Noted. Officers have reviewed the Draft Serpentine Townsite Local Structure Plan in conjunction with the adjoining Draft	Amend the structure plan to realign the Hardey Creek Main Drain along the eastern boundary of the structure plan on Lot 106 Rudall Street.

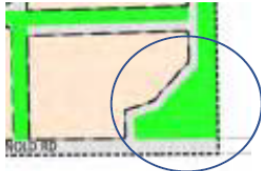
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		<p>BACKGROUND</p> <p>This submission relates to Lots 102 -106 Rudall Street, Serpentine (combined area 18.8ha) (Site).</p> <p>The Site is zoned Urban Development under both the Shire's current Town Planning Scheme No.2 and incoming Local Planning Scheme No.3, and Urban under the Metropolitan Region Scheme and in the WAPC's South Metropolitan Peel Sub-Regional Planning Framework.</p> <p>The Site is included in the Serpentine Townsite Structure Plan (STSP), which was initiated in 2011.</p> <p>The original STSP was advertised in 2014 where a detailed submission was lodged by ourselves and other affected landowners.</p> <p>After advertising considerable dialogue occurred between ourselves and the Shire and in 2016 our consultants at the time, Harley Dykstra, prepared and submitted to the Shire a Subdivision Concept Plan for the Site which proposed to realign the Hardy Creek Main Drain with a narrower POS along the eastern boundary of the lots which reduced the overprovision of POS on our land.</p> <p>In 2017 we engaged Coterra Environment to undertake drainage modelling, which confirmed the adequacy of the realigned Hardy Creek Main Drain review and provided a conceptual design to support this realignment of the drainage and reduction in POS across the Site (referred to as Coterra (2017) which is consistent with the reference used in the STSP 2021). The Coterra (2017) was duly supported by Shire officers in writing in March 2017.</p> <p>In January 2018, the STSP was considered by the Statutory Planning Committee (SPC) of the WA Planning Commission (WAPC), who resolved that the STSP be modified in accordance with a Schedule of Modifications and re-advertised. One of the Modifications was for the STSP to be modified to be consistent with the Coterra (2017).</p> <p>In 2019, our project team undertook a review of the southern portion of the Hardy Creek Main Drain alignment. Following this review, we proposed to straighten the alignment of the Hardy Creek Main Drain either side of Arnold Road – see below image:</p> 	<p>Arnold Road Local Structure Plan regarding the drainage and POS interface. Under the proposed advertised versions of the two structure plans, the Hardey Creek Main Drain does not connect. As such, Officers support the realignment of the Hardey Creek Main Drain within the Draft Serpentine Townsite Local Structure Plan to ensure integration with the Draft Arnold Road Local Structure Plan. However, Officers do not support the reduction in POS on Lot 106 Rudall Street, as this POS has been identified to provide a recreational POS function for the south-east portion of the Draft Structure Plan. The allocation of POS on Lots 102-106 Rudall</p>	<p>Amend the structure plan to reconfigure the Public Open Space on Lot 106 Rudall Street to provide a rectangular area of Public Open Space to the west of the Hardey Creek Main Drain, where an equivalent amount of Public Open Space is provided to the re-advertised version of the structure plan.</p> <p>Amend the structure plan to identify a road to abut the western boundary of the reconfigured Public Open Space on Lot 106 Rudall Street.</p> <p>Part 1, Section 6.1.1 – Amend the text to state: <i>'LDPs may be required for but not</i></p>


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		 <p>The northern extent has the same alignment as the Coterra (2017). The proposed straightening was modelled by Coterra/ Hyd2o and the modelling confirmed that the required flows can be contained within the proposed drainage corridor (please see Attachment 1 which will be referred to as the Coterra / Hyd2o (2019)).</p> <p>The straightening of the Hardy Creek Main Drain modelled by the Coterra/ Hyd2o (2019) is considered minor in the context of the overall structure plan. It improves the future lot configuration, does not impact any other landowners and improves the efficiency of the main drain in conveying water.</p> <p>In late 2019, we approached the Shire and the Department of Planning and provided the Coterra/ Hyd2o (2019) and requested that the proposed straightening of the Hardy Creek Main Drain be included in the revised LWMS required by the SPC's modifications and, subsequently, the STSP. We considered this approach more efficient and timely than the Shire preparing the LWMS on the current accepted Coterra (2017) alignment, a submission being prepared by us requesting that it be straightened and then the LWMS and STSP being amended again after the advertising. The Shire and the Department of Planning advised that as the modifications were a formal resolution of the SPC they were unable to accept any further modifications and we would need to present the straightening of the Hardy Creek Main Drain (Coterra/ Hyd2o (2019) modelling) during the readvertising of the STSP.</p>	<p>Street was significantly reduced as a part of the WAPC modification relating to these lots. It is not an effective response to further reduce this, as it is considered to detract from overall functionality that the current and future community should reasonably expect of their POS network. Officers consider that there is a need for POS for the purpose of recreation to be provided in the southern portion of the Draft Structure Plan. Locating this POS adjacent to the multiple use corridor is logical to promote accessibility and encourage walkability and active modes of transport. This also helps with creating a robust asset which is balanced between dynamic and static points along the</p>	<p><i>limited to the following lots contained within the LSP'.</i></p> <p>Part 1, Section 7.1 – Include a Site and Soil Evaluation to the list of investigations and management plans.</p> <p>Part 2, Section 3.3.3 – Include that a Site and Soil Evaluation is required to be submitted as a part of a subdivision application.</p> <p>Transport Impact Assessment – Update the Transport Impact Assessment (TIA) to reflect the most up-to-date information available and the changes which have occurred to the planning framework and road</p>

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		<p>On 28 January 2021, we were informed by letter from the Shire of the readvertising of the STSP 2021 (referred to as the STSP 2021).</p> <p>We requested an extension to the lodgement date for our submission and this was granted by the Shire until 10 March 2021.</p> <p>Our comments on the readvertised STSP 2021 are as follows:</p> <p>REALIGNMENT OF THE HARDY CREEK MAIN DRAIN - COTERRA (2017)</p> <p>The Local Structure Plan map (Figure 1) contained in the STSP 2021 shows the Hardy Creek Main Drain in the realigned location as modelled by the Coterra (2017) and as supported by the SPC in January 2018.</p> <p>We are supportive of the incorporation of this realignment in the STSP 2021.</p> <p>MINOR STRAIGHTENING OF HARDY CREEK MAIN DRAIN – SUPPORTED BY COTERRA/HYD20 (2019)</p> <p>As mentioned in the background above, in 2019 a review was undertaken of the southern portion of the Hardy Creek Main Drain.</p> <p>As part of this review, we propose an additional minor “straightening” of the Hardy Creek Main Drain corridor immediately north and south of Arnold Road. We note that the southern portion lies outside the STSP 2021 area.</p> <p>Relevant portion of Hardy Creek Main Drain as per STSP 2021:</p> 	<p>corridor.</p> <p>Officers recommend that the POS on Lot 106 Rudall Street be reconfigured to provide a rectangular area of POS adjacent to the Hardey Creek Main Drain, where an equivalent amount of POS is provided to the re-advertised version of the Draft Structure Plan. The reconfiguration of the POS in this manner will allow it to connect with the POS identified within the Draft Arnold Road Local Structure Plan to the south. Officers also recommend that the road identified adjacent to the POS on Lot 106 Rudall Street is straightened to abut the western boundary of the POS.</p> <p>The submission also has</p>	<p>network since 2013.</p>

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		<p>Proposed “straightening” of southern portion of Hardy Creek Main Drain as per this submission:</p>  <p>Our consulting hydrologist and civil engineers identified this logical further straightening as a better outcome for the drainage corridor’s functionality.</p> <p>The proposed straightening is supported by additional hydraulic modelling undertaken by Coterra / Hyd2o (2019) (Attachment 1) and results in a straight north-south alignment feeding directly into the proposed drainage channel alignment on Lot 487 Arnold Road.</p> <p>The Coterra/ Hyd2o (2019) provides modelling of the revised design which straightens the Hardy Creek Main Drain in the south and demonstrates that the required flows can be contained within the proposed drainage corridor. The straightening improves the future lot configuration, does not impact any other landowners and improves the efficiency of the main drain in conveying water as shown by the results contained in Table 1 of Coterra/ Hyd2o (2019).</p> <p>In light of the above, we request that the proposed straightening of the Hardy Creek Main Drain be incorporated into the STSP 2021. The finalisation of hydrology reviews, POS assessment and the STSP update at this time allows for these matters to be adopted prior to completion of the final STSP for endorsement.</p>	<p>queried how the POS modifications required by the WAPC have been incorporated into the POS schedule within the re-advertised Draft Structure Plan. The Shire engaged consultants to undertake a review of the POS schedule in light of the WAPC modifications. The WAPC modification required the Shire to undertake further amendments to the POS schedule to incorporate the WAPC modification to the POS on Lots 102-106 Rudall Street. The consultants engaged by the Shire prepared a revised POS schedule to ensure the accuracy of all calculations across the Draft Structure Plan area incorporating all WAPC modifications.</p> <p>In regard to the delivery</p>	

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		<p>REVISED POS SCHEDULES</p> <p>In light of our proposed straightening of the Hardy Creek Main Drain, a review is required of the POS provision (Unrestricted and Restricted) contemplated in the STSP overall and specifically for the Site.</p> <p>The attached POS tables outline our proposed POS provision in response to the straightening of the Hardy Creek Main Drain, and in light of the overall POS allocation:</p> <p>Attachment 2 – POS Review on the Site</p> <p>Attachment 2 demonstrates the allocation of deductible, restricted and unrestricted POS applicable within the three noted areas of POS on the Site.</p> <p>Notable, the schedule shows that:</p> <ul style="list-style-type: none"> • 1.9512 ha of unrestricted POS is provided, comprising 11.9% of the Site; • 0.7261 ha of restricted POS is provided, comprising 0.328% of the Site; • Acknowledging the limit on the extent of creditable restricted POS the total creditable POS provided from the Site would be 2.2792ha or 13.90%, representing a surplus of 0.63967ha; and • In real terms some 16.33% of the Site is to be provided (2.6773ha) even under this adjusted scenario that reflects the straightening of the drainage corridor. <p>As a significant impost for any landowner, we seek support for the straightening of the Hardy Creek Main Drain proposed as outlined to limit the imposition on our Site.</p> <p>Attachment 3 – STSP 2021 – POS Review</p> <p>Attachment 3 demonstrates the allocation of deductible, restricted and unrestricted POS applicable within the STSP 2021 area. It also reviews this against the SPC modifications, the advertised Plan, and the modifications necessary to accommodate the straightening of the Hardy Creek Main Drain.</p>	<p>of POS, the submission raises that a Development Contribution Plan should be prepared to ensure the equitable sharing of POS and infrastructure costs. Officers do not support this, as there is an established State Planning framework to provide a minimum 10% POS as part of subdivision. This emphasises that the 10% is a minimum, and not a maximum. There is also an established framework that any ceded POS must achieve a minimum level of embellishment, at the cost of the subdivider. Finally, it is noted that the delivery of local POS derives a local benefit to the local subdivider. The basis of sharing costs is not, in the opinion of</p>	

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		<p>The review which incorporates the proposed straightening of the Hardy Creek Main Drain shows that:</p> <ul style="list-style-type: none"> • Significant POS is provided in a variety of locations across the Serpentine townsite comprising some 8.7806ha of unrestricted POS (8.14%); and • Approximately 2.1184 ha of restricted POS (1.96%) is also provided. <p>The total amount of POS across the townsite comprises 10.899ha (compared to the SPC approved 10.8558ha). We note this totals 10.11% POS. It is also noted that several assumptions were made when our review was undertaken of the POS Schedule in the STSP 2021 (noted in Attachment 3) and it is not clear how the SPC's modifications have been incorporated.</p> <p>We request that the POS Schedule (Table 3) contained in the STSP 2021 be reviewed in detail to accommodate the straightening of the Hardy Creek Main Drain and to address the errors / inconsistencies with the SPC's modifications identified in Attachment 3.</p> <p>We do highlight that all of the adjustments proposed by our submission are supported by hydrology advice demonstrating the appropriateness of the changes and the retained functionality of stormwater management.</p> <p>The following further points are made in support of our proposal which straightens the Hardy Creek Main Drain and consequently reduces the POS on our Site (and the STSP area):</p> <ul style="list-style-type: none"> • The adjustment of POS is a more equitable and appropriate design outcome, particularly for a landowner already providing an excess of the required POS provision for their overall landholdings. • Further to the above, there has been no Developer Contribution Plan established to provide the compensation required for this POS or drainage, and accordingly, we submit that only 10 per cent of the STSP area should reasonably be required for POS/drainage. 	<p>officers, present in this matter.</p> <p>The WAPC also required a modification to include a provision that individual landowners will be responsible for the delivery of POS and road infrastructure at the time of subdivision. Officers consider this is an appropriate approach for the delivery of infrastructure within the Draft Structure Plan. With regard to Local Development Plans, Officers support amending the text to state 'LDPs may be required for but not limited to the following lots contained within the LSP' to reflect that this is subject to subdivision assessment.</p> <p>Future subdivision will be</p>	

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		<ul style="list-style-type: none"> The modified POS schedule prepared to support our proposal demonstrates that an excess of POS is still provided on our Site to the STSP area. Should the Shire determine further POS is required for the townsite, which we do not believe warranted, it should be located elsewhere. The area of POS in question on the Site is not sited to equitably service its intended urban population. If the Shire remains intent on delivering the same volume of POS as per the originally advertised STSP, as referenced in their resolution, we submit as follows: <ul style="list-style-type: none"> The Coterra / Hyd2o (2019) modelling has demonstrated that the proposed straightening does not result in deep channel waterways; and An area of POS equivalent to that proposed to be removed from Lot 106 should be located in a more central location within the STSP area, so it can serve the urban population it is required to serve under the Liveable Neighbourhoods. In the absence of a Developer Contribution Plan, no method of compensation has been established to support the overprovision of any public infrastructure on any site. The current provisions of the STSP require the ceding of in excess of 10 percent of our Site. Further, we understand that it would be a requirement that this land be landscaped and maintained for a period of two years, over and above the formal ceding of this land in accordance with Liveable Neighbourhoods policy requirements. We submit that this is more than onerous in itself and our request to straighten the Drain (and reduce the POS on our Site) is more than reasonable. 	<p>subject to the provisions of the Government Sewerage Policy 2019. A Site and Soil Evaluation is recommended to be required at subdivision stage. Part 1 Section 7.1 and Part 2 Section 3.3.3 is recommended to be modified to include that a Site and Soil Evaluation should be provided at subdivision stage. This aligns with the requirements of the Government Sewerage Policy 2019.</p> <p>Officers recommend that the Transport Impact Assessment (TIA) be updated to reflect the most up-to-date information available and the changes which have occurred to the planning framework and road network since 2013.</p>	

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		<p>PART 1 CLAUSE 6.1.1 - LOCAL DEVELOPMENT PLANS</p> <p>We understand the role and function of Local Development Plans (LDP) as a planning tool. We also understand that the indicative subdivisional layout generated to support progression of the STSP shows a design that may require the use of LDPs to address some built form or other controls (i.e., for lots abutting POS). It is important to realise though that this layout may be amended to reflect the detailed design and engineering of each property and market influences at the time of subdivision. The need for an LDP is therefore not guaranteed and is a matter for assessment at the subsequent subdivision stage.</p> <p>The LSP should reflect this situation, acknowledging that the Shire may request and the WAPC may impose, a requirement for an LDP at that time, but depending on final detailed subdivision design and lot orientation at that time.</p> <p>Accordingly, we request Part 1 Clause 6.1.1 be amended as follows:</p> <p>“LDP’s <u>may</u> be required for but not limited to the following lots contained within the LSP”.</p> <p>PART 1 CLAUSE 8.0 - POS AND INDIVIDUAL LANDOWNER RESPONSIBILITY</p> <p>Reference is made to Clause 8.0 of Part 1 of the STSP 2021, which states as follows:</p> <p>“Individual landowners will be responsible for the delivery of POS and road infrastructure at the time of subdivision.</p> <p>Landowners will be required to cede land free of cost as required, while also making payment for the full cost of construction, for roads located within their landholdings as depicted on the Local Structure Plan”.</p>		

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		<p>The SPC's consideration of the draft STSP in 2018 acknowledges that Developer Contribution Plans (DCP's) are an appropriate mechanism for the coordination of local infrastructure. In this regard, the Commission noted that no such DCP has been prepared and in that context, the regular practice for public open space and road delivery should occur, resulting in the inclusion of Clause 8.0 above.</p> <p>In reviewing the SPC report it is clear that the SPC considered the challenges associated with a DCP facilitating reticulated sewer infrastructure in Serpentine and noted that conditions requiring a DCP contribution could not be reasonably imposed on a subdivider in the absence of an actually contemplated DCP. At no point does the SPC form a view, and this would be contrary to WAPC policy, that a DCP cannot be prepared. We are of the view that this is an acknowledgement that a DCP could be prepared to support the delivery of public open space in the STSP area.</p> <p>We consider it is entirely appropriate in this case that a DCP be prepared to ensure the orderly, transparent, equitable sharing of POS and infrastructure costs and delivery. We would request the DCP be prepared in conjunction with the finalisation of the STSP.</p> <p>If the position is taken that no DCP will be prepared, we consider at the very least, the STSP should be amended to:</p> <ul style="list-style-type: none"> • Reflect no more than 10% POS overall within the STSP area, aligning as close as possible to the accepted requirements of 8% Unrestricted POS and 2% Restricted POS; • Reflect the above outlined limits on POS for our Site; • Reflect established practice that stipulates the subdivision of any property within the STSP area not designated as providing POS 'land' shall be subject to a cash-in-lieu POS obligation at the time of subdivision; • Stipulate that funds received from POS cash-in-lieu payments within the STSP area shall be used to facilitate POS acquisition and development in locations where a greater than 10% obligation is imposed on a landowner to ensure that landowner provides no more than the equitable 10% POS land and associated development; and • Clearly specify how road upgrades and other infrastructure contemplated by the STSP are going to be funded. 		

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		<p>ON-SITE SEWERAGE & WASTEWATER MANAGEMENT STRATEGY</p> <p>In relation to the absence of reticulated sewer being provided for the Serpentine Townsite we acknowledge that the STSP is accompanied by a Wastewater Management Strategy. We seek confirmation though that, subject to reasonable site specific land capability testing, the STSP area should now be able to be developed to the reduced density of R5 (not R10) to the entire extent of the residential area shown. It is entirely unacceptable for landowners to have the STSP adopted, POS requirements imposed, and dwelling yields assumed without certainty of development potential. We therefore request that the STSP be updated to include provisions and acknowledgement advice that:</p> <ul style="list-style-type: none"> • Acknowledges the designated extent of the Residential R5 area will be developed for 2000m2 allotments and will not be subject to further buffer separation or other requirements that are not already documented in the STSP; • Any subsequent requirements in relation to on-site effluent disposal are to ensure site-specific (individual lot) compliance with accepted Site and Soil Evaluation requirements. <p>We require certainty that the development potential of the Site is not going to be undermined at a later date.</p> <p>APPENDIX 1 URBAQUA LWMS ADDENDUM – REVIEWED BY HYD2O HYDROLOGY</p> <p>Our consultant, Hyd2o have reviewed the Urbaqua Local Water Management Strategy Addendum (Addendum) contained in the STSP 2021.</p> <p>Hyd2o's comments on the Addendum are provided in Attachment 4.</p> <p>The comments generally relate to updates required to ensure the Addendum is consistent with the accepted Coterra (2017) modelling and the Coterra/ Hyd2o (2019) further modelling provided in this submission relating to straightening the southern portion of the Hardy Creek Main Drain.</p> <p>We request that the STSP, in particular, the Addendum are updated to address Hyd2o's comments contained in Attachment 4.</p>		

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		<p>APPENDIX 2 TRAFFIC ASSESSMENT – REVIEWED BY GTA (NOW STANTEC)</p> <p>Our consultant, GTA (now Stantec) has reviewed the Transport Impact Assessment completed in 2013 in support of the STSP and are of the opinion that a fresh Traffic Impact Assessment (TIA) should be completed for the STSP given the length of time that has elapsed between when it was written and the readvertising of the STSP 2021.</p> <p>In particular it would be expected that the STSP be supported by a TIA that was undertaken in accordance with the current WAPC Guidelines Volume 2 – Planning Schemes, Structure Plans and Activity Centre Plans.</p> <p>Further, we seek more detail as to the likely proportion of traffic from the STSP that would use Arnold Road to access South Western Highway and the proposed intersection control types (and timing) for intersections within the STSP area and Arnold Road / South Western Highway that are required as a result of the STSP traffic.</p> <p>The Opus TIA recommendations include items that require further analysis and we consider these items should be addressed by a fresh TIA.</p> <p>In this regard, we refer to Part 2 Section 3.2 Movement Networks of the STSP 2021 which states:</p> <p><i>The traffic study undertaken by OPUS indicated that additional development within the Townsite in the short term is unlikely to impact on the surrounding road network. The anticipated longer term traffic generated from 2021 onwards is expected to increase traffic volumes on local access road network.</i></p> <p><i>It is expected that the Karnup Road / Wellard Street intersection will consist of a roundabout, with a final design to be confirmed at such time as improvement of this intersection is deemed necessary.</i></p>		

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		<p>We consider that an updated TIA should provide the needed clarification around movement networks and the intersection and road infrastructure required for the STSP and the timing for provision of such infrastructure.</p> <p>SUMMARY & FINALISATION OF THE STSP 2021</p> <p>We support the incorporation of the realignment of the Hardy Creek Main Drain (as modelled by Coterra (2017)) in the STSP 2021.</p> <p>We seek that the Hardy Creek Main Drain be straightened in the southern portion as proposed by this submission (and supported by the Coterra/ Hyd2o (2019)) and this straightening be reflected in the STSP 2021.</p> <p>In summary, we request the following main items are addressed in the STSP 2021:</p> <ol style="list-style-type: none"> 1. The wording in clause 6.1.1 of Part 1 (LDPs) is updated; 2. The proposed straightening of the southern portion of the Hardy Creek Main Drain as supported by the Coterra/ Hyd20 (2019) be accepted and incorporated in the STSP 2021; 3. The POS Schedule (Table 3 of the STSP 2021) be reviewed in detail and updated to reflect the proposed straightening of the southern portion of the Hardy Creek Main Drain and to address the other issues identified with the POS Schedule as outlined in Attachment 3; 4. A DCP be prepared to ensure the orderly, transparent and equitable sharing of POS and infrastructure costs and delivery; 		

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		<p>5. Confirmation that the designated extent of the Residential R5 area will be developable to the full extent of that density and will not be subject to further buffer, separation or other requirements that are not already documented in the STSP 2021;</p> <p>6. The LWMS Addendum is updated to address the comments outlined by Hyd2o in Attachment 4; and</p> <p>7. A fresh Traffic Impact Assessment is prepared to support the STSP 2021.</p> <p>We consider that these updates are required to the STSP 2021 to enable it to function fairly and effectively.</p> <p>We request that these updates be addressed as soon as possible to enable the STSP to be finalised given the timeframe that has passed since the STSP was originally prepared back in 2011.</p>		
J. Morgan IN21/6853	28.	<p>116 Richardson Street, Serpentine</p> <p>I will not agree losing my land but would consider if my block is included in the subdivision.</p> <p>I have considerable experience in earthwork drainage, road building, pipelaying and subdivision work and would be happy to discuss amendments to this situation.</p>	<p>Noted.</p> <p>Officers agree that the implementation of the structure plan may be impacted by the fragmented land ownership of land holdings. Officers recognise the implementation issues associated with the proposed alignment of an east-west road on the northern boundary of the structure plan, which</p>	<p>Amend the structure plan to move the east-west road located at the northern structure plan boundary to be wholly located within Lot 12 Richardson Street at the northern boundary.</p> <p>Amend the structure plan to move the 'North Park' public open space and drainage to be wholly located within Lot 12</p>

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			<p>traverses the southern portion of Lot 10 Richardson Street.</p> <p>Only the southern portion of Lot 10 Richardson Street is included within the structure plan and with the road identified on this lot, there is little developable residential land on the lot. Lot 10 Richardson Street would be unable to develop independently of Lot 12 Richardson Street, which is located to the south of Lot 10. Officers agree that there would be little practical way for the landowner of Lot 10 to develop, given small portion of land identified as residential on this lot. Furthermore, Lot 12 Richardson Street will require the road access identified on Lot 10 to enable development to</p>	Richardson Street.

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			<p>occur.</p> <p>Officers support relocating the east-west road, currently identified on Lot 10 at the northern structure plan boundary, to the northern boundary of Lot 12. The road would be wholly contained within Lot 12, providing the necessary access to allow Lot 12 to develop independently of Lot 10. This would result in a larger portion of Lot 10 being identified as Residential, which would allow lots to also be created from Lot 10.</p> <p>An area of POS is also located over both Lot 10 and Lot 12 Richardson Street. Officers agree that the development of this POS may be compromised given the limited amount of</p>	

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			residential land identified on Lot 10, resulting in a lack of incentive for Lot 10 to develop. Officers support the relocation of the POS and drainage to be wholly contained within Lot 12 Richardson Street. This would allow for the POS to be delivered as a part of the development of Lot 12.	