

**SUMMARY OF SUBMISSIONS**  
**The Glades Local Structure Plan Amendment No.11 – Cardup Brook Precinct**  
**PA22/502**

Submitter	No	Submitter Comments	Applicant Comment	Shire Officer Comment
Department of Transport IN22/15111	1.	<ul style="list-style-type: none"> <li>• The cycling provision within the precinct should consider the Long-Term Cycle Network (<a href="https://www.transport.wa.gov.au/activetransport/long-term-cycle-network.asp">https://www.transport.wa.gov.au/activetransport/long-term-cycle-network.asp</a>) and be designated in accordance with the WA Cycle Network Hierarchy (<a href="http://www.transport.wa.gov.au/mediaFiles/active-transport/AT_P_WA_CycleNetwork_Hierarchy.pdf">www.transport.wa.gov.au/mediaFiles/active-transport/AT_P_WA_CycleNetwork_Hierarchy.pdf</a>).</li> <li>• The precinct needs to have adequate and safe pedestrian and cycling infrastructure that accommodates people of all ages and abilities. Please refer to the recently released Shared and Separated Path Guidelines for details on appropriate planning and design treatments, available at: <a href="https://www.transport.wa.gov.au/mediaFiles/active-transport/AT_CYC_P_Shared_and_separated_paths.pdf">https://www.transport.wa.gov.au/mediaFiles/active-transport/AT_CYC_P_Shared_and_separated_paths.pdf</a>.</li> <li>• Future on-street cycling lanes within the precinct should be protected from the traffic lane by positioning them between the verge and on-street parking bays, ensuring adequate clearance from car 'dooring'.</li> </ul> <p>Thank you for the opportunity to provide comments. If you have wish to follow up on any of these matters, please do not hesitate to contact Yohan Nugraha.</p>	Noted - The LSP will link into the surrounding movement network via shared paths and footpaths in future consultation with DoT.	The LSP makes provision for shared paths and footpaths throughout the subdivision area linking to major transport corridors. At the time of subdivision, detailed design of the footpaths and shared paths is required.
IN22/18112 IN22/26148	2.	Thank you for your email providing the Department of Education (the Department) with the opportunity to comment on the proposed The Glades – Local Structure Plan Amendment No. 11, primarily for Cardup Brook Precinct Local Structure Plan	<b>Background and surrounding context &amp; Overview of public-school demand in Byford South</b>	The Shire notes the Department of Education was initially concerned with the lack of the provision of a

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Department of Education		<p>Amendment No. 11 (Cardup Brook LSP). I would also like to thank you for providing an extension to the advertising period.</p> <p><b>Background and surrounding context</b></p> <p>In September 2000, the Byford District Structure Plan (BDSP) was advertised by the Shire of Serpentine Jarrahdale (Shire) with an anticipated dwelling yield (excluding Byford by the Scarp) of 9,400 dwellings. In September 2006, the Shire advertised the Local Structure Plan for the Byford Main Precinct (BMP) which covered the area owned by LWP Property Group. The BMP area represented approximately 30% of the BDSP area with a lot yield estimated at 4,000. The anticipated dwelling yield indicated to the Department that the original lot yield anticipated as part of the BDSP area had increased from its original estimate of 9,400 dwellings. Subsequently, in 2007 the Department discovered the lot yield for the BDSP area increased to 11,569 lots resulting in an under provision of public primary schools within the locality. At this time, the Department wrote to the Western Australian Planning Commission and clearly stated that an additional primary school was required in the locality of The Glades Local Structure Plan area.</p> <p><b>Overview of public school demand in Byford South</b></p> <p>The Department continues to undertake extensive analyses of residential growth and student accommodation demand within the Byford South area. Recent analysis of the existing and projected number of dwellings reveals that there is a total of 5,776 dwellings anticipated within the Byford South area</p>	<p>The yield analysis prepared by DoE for the Byford South area is noted. However, we point out that the yield estimates for Byford South (and Byford area generally) have not changed considerably over the last few years. During this time, LWP lodged an amendment to The Glades LSP for the Cardup Brook Precinct in 2016 and local and district structure planning has also been progressed by others. LWP has also provided land for schools and pro-rata contributions applied on recent subdivision approvals.</p> <p><b>Student demand and public primary school accommodation capacity</b></p> <p>We confirm that the grouped / multiple dwelling sites proposed under the LSP Amendment have been factored into the proposed lot yield and school analysis which is capable of achieving 980 dwellings. The final development outcome cannot be confirmed at the LSP</p>	<p>school site within the Amendment area. Since then, the Department of Education has submitted a revised submission that removes the requirement for an additional school site within the Cardup Brook Precinct.</p> <p>The Shire will continue to liaise with the Department of Education regarding future planning for School sites.</p>

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		<p>(bounded by Abernethy Road, Proposed Tonkin Highway, Cardup Brook and Soldiers Road).</p> <p>In accordance with the Western Australia Planning Commission's Operational Policy 2.4 – Planning for School Sites (OP 2.4), one public primary school is required for a dwelling yield threshold of 1,500 dwellings. Based on a dwelling yield projection of 5,776 dwellings, 3.2 to 3.9 public primary schools would be required to be provided within this locality. However, the Byford South area comprises two public primary schools, Beenyup Primary School and Woodland Grove Primary School with no future primary school proposed. Consequently, there is a significant deficiency of public primary schooling within Byford South.</p> <p>The applicant, Taylor Burrell Barnett (TBB), has provided a high-level analysis of the provision of primary schools within the area bounded by Abernethy Road, Doley Road, Cardup Brook and Soldiers Road. TBB outlines a total yield of 3,895 lots is demonstrated in this area and as per the OP 2.4 requirements it would generate the need for 2.6 primary schools. TBB indicates two public schools and a private school is provided in this area and therefore the inclusion of an additional school is not warranted. However, it is important to note the area only comprises one public primary school, Beenyup Primary School. Refer to Attachment 1. In addition, the local intake area for Woodland Primary School does not go across Doley Road.</p>	<p>stage, and as with any lot yield assessment is a well-informed estimate only and can only be confirmed at subsequent development stages.</p> <p><b>Future primary school site</b></p> <p>In summary, we acknowledge the DoE concerns and need to meet the anticipated school requirements of the local Byford community. However in the DoE's planning for a future primary school site, there are other considerations that need to be acknowledged:</p> <p>The development of the Cardup Brook precinct does not generate the need for an extra primary school in its own right.</p> <p>- The spatial configuration of the Cardup Brook precinct does not lend itself to placement given the topography of the site and its narrowness between Orton Road and the Cardup (hence why Beenyup PS was identified in the location that it is and LWP making a pro-rata contribution through existing subdivision approvals).</p>	

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		<p><b>Student demand and public primary school accommodation capacity</b></p> <p>The Cardup Brook LSP proposes an anticipated dwelling yield of 980 dwellings. TBB has indicated the extent of grouped / multiple dwellings to be developed at the R60 or R80 density code is difficult to ascertain and will be refined at a later stage. Ultimately, the dwelling yield may increase beyond the projected 980 dwellings.</p> <p>It is imperative to note that when the Department strategically plans for future school sites many factors are considered. The Department has considered student local intake boundaries, accommodation capacities of existing schools, existing / projected dwelling yields and the residential density proposed within the Cardup Brook LSP. With the addition of 980 dwellings from the Byford South area, it will pose significant enrolment pressure on public schooling with the vicinity.</p> <p>As Beenyup Primary School is the only public primary school within the area referred to in Attachment 1, if another public primary school is not constructed, Beenyup Primary School could easily exceed 1,000 students. Consequently, this will have a negative impact on the educational outcomes and operations of the school. In addition, the amenity of the surrounding neighbourhood will be adversely impacted due to significant increases in traffic around the school. Furthermore, based on the student demand within the locality, Woodland</p> <p>Grove Primary School will also have to operate as a large school and exceed its</p>	<p>Acknowledge that the yield analysis prepared by TBB and DoE is comparable, however as mentioned these yields have not changed considerably over the last few years and no issues raised by DoE at this time. It is critical to understand where the gap in provision lies and how best to service this catchment.</p> <p>- As outlined in our amendment request, consideration should also be given to utilising/expanding upon existing school sites given the above considerations/ constraints.</p> <p>Action (post-SJ Meeting 13/01/22):</p> <ul style="list-style-type: none"> <li>• Meeting has been arranged with DoE, DPLH and LWP/TBB on 9/11/2022 to discuss options to meet school requirements.</li> </ul>	

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		<p>accommodation capacity.</p> <p><b>Future primary school site</b></p> <p>In view of the above and as raised in previous correspondence, the Department would like to reiterate that there is an insufficient number of public primary schools within the Byford South locality. On this basis, the Department has significant reservations with the Cardup Brook LSP and does not support the Cardup Brook LSP in its current form without the inclusion of a future primary school site.</p> <p>If a future primary school site is accepted, ideally a 3.5ha school site with shared use oval, located in the central area of the LSP and preferably on the western side of the district open space would be preferred location.</p> <p>The Department would welcome the opportunity to continue its conversations with the Shire, TBB and LWP Property Group to ensure a future school site is included within the locality.</p> <p><b>Proposed ‘The Glades – Local Structure Plan Amendment No. 11 (Cardup Brook &amp; Icaria Stages 13 -14)’</b></p> <p>I refer to the Department of Education’s (the Department) written submission to the Shire of Serpentine Jarrahdale (the Shire) dated 31 August 2022 on the abovementioned structure plan amendment proposal, primarily for the Cardup Brook Precinct Local Structure Plan (Cardup Brook LSP).</p> <p>The Department had requested a future public primary school site to be included within the Cardup Brook LSP to support the anticipated increase in public student enrolment demand within</p>		

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		<p>the Byford South area (bounded by Abernethy Road, proposed Tonkin Highway, Cardup Brook and Soldiers Road) and to offer accommodation relief to the existing Beenyup and Woodland Grove Primary Schools.</p> <p>However, since the Department's submission in August 2022 and comprehensive discussions with the Shire, Department of Planning, Lands and Heritage and the Applicant/developer, there have been major planning changes on the undeveloped areas to the south of Cardup Brook LSP which necessitated a holistic review of public school planning for the broader Byford locality.</p> <p>Whilst the residential growth and student demand analysis for Byford South area as previously advised remains relevant, the recent updates on the status of the Western Australian Planning Commission's (WAPC) Cardup Planning Investigation Area (PIA), and the structure planning of Lot 33 Hopkinson Road, Cardup have required the Department to reassess its options.</p> <p>The Department understands that the following matters have been/are currently being contemplated:</p> <ul style="list-style-type: none"> <li>• The structure planning for Lot 33 Hopkinson Road, Cardup has progressed significantly and includes a new public primary school site and secondary school site;</li> <li>• A new crossing/access over Cardup Brook, providing strong connectivity between Lot 33 Hopkinson Road, Cardup to the Cardup Brook LSP which will be delivered by Main Roads WA; and</li> <li>• The Cardup PIA remaining zoned for rural residential use.</li> </ul>		

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		<p>In light of the above information, further analysis on the extent and distribution of student enrolment catchment areas across the Byford locality reveals that a new public primary school site within the Cardup Brook LSP is no longer the preferred option. Whilst the provision of an additional primary school site would provide for optimum public education outcomes in the area, the Department recognises there has been significant changes to the planning framework since the previous submission.</p> <p>Notwithstanding this, should there be any changes to the above information and/or further increase in dwelling yields beyond what is currently envisioned within the draft Cardup Brook LSP and Lot 33 Hopkinson Road, Cardup Structure Plan, the Department reserves the right to undertake further review of the public educational needs which may require additional public primary school site(s) in the Byford locality.</p> <p>The Department will continue to closely monitor the student enrolment demand and if required, engage with the Shire to forward plan for the educational needs of the locality in line with the WAPC's Operational Policy 2.4 – Planning for School Sites.</p>		
IN22/17307 DFES	3.	<p><b>Vegetation exclusions</b></p> <p>The BMP has excluded several POS Drainage reserves and some areas of land outside the control of the owner as managed to low threat under AS3959. The submitted Landscape Management Plan (LMP) describes Foreshore Drainage POS as being revegetated and temporarily irrigated. It is unclear in the BMP or LMP how these areas will be managed to low threat in perpetuity. The decision maker to be satisfied with the vegetation</p>	<p><b>Vegetation Exclusions</b></p> <ul style="list-style-type: none"> <li>The landscape masterplan, notes, in amongst other treatments that drainage basins will likely include reeds, sedges and tree planting, and as is typical of these areas it is assumed would be managed (as</li> </ul>	<p>The Bushfire Management - Plan is to be updated to address the concerns of DFES to ensure an accurate BMP accompanies the Structure Plan. It is noted that in its current form the BMP supports the Amendment and is generally supported by</p>

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		<p>exclusions and vegetation management proposed. Alternatively, the vegetation should be classified as per AS3959, or the resultant BAL ratings may be inaccurate. Clarification required</p> <p><b>Location, and Siting &amp; Design</b></p> <p><b>A1.1 &amp; A2.1 – not demonstrated</b></p> <p>The BAL ratings cannot be validated for the reason(s) outlined in the above table.</p> <p>In addition, the BAL Contour Map recognises remnant vegetation as having an extreme bushfire hazard. While the structure plan has responded to the risk through provision of hazard separation (perimeter roads and managed POS) the structure plan depicts several areas subject to BAL40/FZ. This includes areas adjacent to the temporary hazard, and lots adjacent to Soldiers Road, both of which are identified in Figure 6 of the BMP.</p> <p>The decision maker should be satisfied development within BAL29 or below can be achieved. DFES recommends any future lots impact by BAL40/FZ are withheld until the hazard can be managed or removed. Modification of the BMP required</p> <p><b>Recommendation – supported subject to modifications</b></p> <p>At the structure planning stage, consideration should be given to the intensification of land use and how this relates to identified bushfire hazards. DFES is satisfied the BMP has adequately identified the bushfire risk and considered how compliance with the bushfire protection criteria can be achieved at subsequent planning stages.</p>	<p>is required to meet the water sensitive urban design requirements, not just bushfire). Regardless of the planting approach, management of these areas means they can achieve low threat in accordance with AS 3959.</p> <ul style="list-style-type: none"> <li>• No change is proposed. It is noted, that if as part of subdivision/detailed design there is a decision that the drainage basin areas will not be managed, based on the planting approach, the drainage areas would likely be classified as 'grassland' (which as per other responses still allows for overstorey planting e.g. trees). The majority of the drainage basin areas are separated from</li> <li>• development sites (e.g. where habitable buildings will be located) by a public road and/or managed public open space. The minimum setback to achieve BAL-29 or less is 8 m (based on grassland) and is more than accommodated by the</li> </ul>	<p>DFES. However, some modifications to the BMP are required.</p> <p>The Bushfire Management Plan is required to be updated to the satisfaction of the Shire and DFES, address concerns raised.</p>



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		<p>However, modifications to the BMP are required prior to subsequent planning stages to ensure compliance with the bushfire protection criteria. As these modifications are minor in nature and will not affect the Structure Plan, these modifications should be undertaken to support subsequent stages of the planning process (subdivision and development applications).</p>	<p>road/managed POS areas. Therefore, future subdivision could still be supported. Where the drainage areas directly abut development cells (in the west), setbacks to achieve BAL-29 or less can be accommodated as part of detailed design, and location of maintenance access tracks or similar (to provide separation).</p> <p><b>Location, and Siting &amp; Design</b></p> <ul style="list-style-type: none"> <li>• As per the comments above, the BAL contour plan is based on the assumptions in the BMP supported by the Landscape Masterplan. No change is proposed, and therefore the BAL ratings will not change compared to that already provided.</li> <li>• It was acknowledged in the BMP that BAL-40/BAL-FZ extends into a very small portion of the lots. The development layout enables lots to be of a depth to enable the 'development site' (e.g. 'the part of the lot on which a building that is the subject of</li> </ul>	

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			<p>development stands or is to be constructed', as per the definitions in the Guidelines) to achieve BAL-29 or less as part of subdivision design and therefore complies with A2.1. The BMP also states as a responsibility, that habitable buildings need to be located so that BAL-29 or less applies.</p> <p><b>Recommendation – supported subject to modifications</b></p> <ul style="list-style-type: none"> <li>• Table 6, under the developer responsibilities (action no. 2) already states that a new/revised BMP is to be prepared to support future subdivision applications.</li> <li>• It is unclear what modification is required when the BMP already requires a revised BMP to be prepared.</li> </ul>	
IN22/19355 Heritage Council Western Australia	4.	As Lot 9000, 9001 and 9060 Orton Road, Byford are not listed or adjacent to a place listed on the State Register of Heritage Places or the Assessment Program Historic Heritage Conservation does not have any comment.	No action required.	Noted.

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DPLH – Heritage				
IN19519 Department of Biodiversity Conservation and Attractions	5.	The Department of Biodiversity Conservation and Attractions - Swan Region Office has no comments on the proposal.	No action required.	Noted.
IN22/19715 IN23/1008  DWER	6.	<p>The Department of Water and Environmental Regulation (the Department) has reviewed the amended Local Structure Plan (LSP) and associated documents and wishes to advise that it does not support the proposed amendment and provides the following comments.</p> <p>The LSP proposes amendments to the distribution of public open space (POS) within the Cardup Brook Precinct, in particular POS adjacent to the Cardup Brook. <i>The Glades at Byford: Cardup Brook East Precinct Preliminary Urban Water Management Plan</i> (JDA, May 2022) and <i>The Glades at Byford: Cardup Brook West Precinct Preliminary Urban Water Management Plan</i> (JDA, May 2022), located at Appendix H of the Local Structure Plan Amendment 11 information package received by the Department, indicate drainage infrastructure such as storage basins are to be located within the Cardup Brook wetland buffer area. Specifically, drainage infrastructure is proposed within the wetland buffer area in POS 24, 25 and 33.</p> <p>The location of the drainage basins within the Cardup Brook wetland buffer is inconsistent with the approved <i>The Glades at</i></p>	<p>In summary, the Shire’s Technical Officers provided support for the provision of drainage infrastructure within the wetland buffer as part of the assessment of the preceding LSP Amendment for the Cardup Brook Precinct in 2016.</p> <p>The approach within the UWMP (2022) is consistent with this advice that infrastructure above the 1:1yr ARI within the foreshore buffer area is acceptable.</p> <p>This matter was discussed directly with DWER by the project team’s hydrologist, JDA, and a subsequent email response from DWER (dated 06/10/2022) confirming that “<i>in this instance the Department would accept the planned location of the</i></p>	<p>The Shire notes the Department of Water and Environmental Regulation was initially concerned with the location of drainage infrastructure being located within the 30m Resource Enhancement Wetland buffer. Since DWER’s initial submission, they have submitted a revised submission that outlines that while the generally do not support drainage infrastructure being placed within the 30m REW buffer, they will support it if the Shire agrees to it, as the Shire is the managing authority.</p>

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		<p><i>Byford Local Water Management Strategy (LWMS)</i>, (JDA, December 2009) which illustrates all drainage infrastructure will be located outside the wetland buffer in the Cardup Brook Precinct.</p> <p>In addition, the Department emailed the Shire, JDA and the Department of Planning, Lands and Heritage on 8 September 2016 stating non-support for drainage infrastructure located within the wetland boundary in response to <i>The Glades at Byford: Cardup Brook East Precinct Urban Water Management Plan</i> (JDA, July, 2016) and <i>The Glades at Byford: Cardup Brook West Precinct Urban Water Management Plan</i> (JDA, July, 2016). The Department's advice was that hard drainage infrastructure is to be located outside of the foreshore reserve buffer, as per the approved LWMS for the site. This can be achieved through a realignment of the POS adjacent to the Cardup Brook buffer and greater use of at-source infiltration higher in the catchment with the use of roadside or median swales, tree pits or raingardens.</p> <p>Furthermore, <i>The Glades at Byford: Cardup Brook East Precinct Preliminary Urban Water Management Plan</i> (JDA, May 2022) provided in the Local Structure Plan Amendment 11 information package, indicates that the Department had advised that there is no further groundwater available for allocation to the District Open Space (DOS) proposed in the LSP area. The amendment should not proceed until the Shire has a guaranteed source of water for the irrigation of the proposed DOS.</p> <p>Consistent with previous advice and the approved LWMS, the Department cannot support the proposed amendment of the LSP</p>	<p><i>drainage basins as detailed in the UWMPs</i>". This email correspondence has been provided to the Shire and is consistent with past support from the Shire's Technical Officers (03/11/2016, second email attached) for drainage infrastructure within the wetland buffer. Please let us know if there is anything further required in regard to this matter.</p>	<p>Attachment H to the LSP Amendment — Preliminary Urban Water Management Plan dated 23 May 2022, places the combined 1:5 year and 1:100 year basins for catchments within the 30m wetland buffer. For this to be supported, such requires more detailed design information to satisfy the Shire that the risk of water management within the 30m buffer, can be managed and will not pose an ongoing maintenance burden on the Shire, versus if such basins were located wholly outside of the buffer.</p> <p>The LSP Amendment has provided a 4-hectare District Open Space (DOS) for the purpose of active recreation. The final design of the DOS has not been provided as part of this LSP Amendment with the DOS being subject to future detailed design work. Officers consider the</p>

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		<p>until drainage infrastructure is located outside of the Cardup Brook wetland buffer area, and there is a confirmed source of water for irrigation purposes.</p> <p>In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.</p> <p><b>THE GLADES, BYFORD – LOCAL STRUCTURE PLAN AMENDMENT 11 – CARDUP BROOK PRECINCT (AMENDED SUBMISSION)</b></p> <p>Thank you for providing the opportunity to further comment on the draft The Glades, Byford – Local Structure Plan Amendment 11 – Cardup Brook Precinct, received with correspondence dated 14 September 2022.</p> <p>The Department of Water and Environmental Regulation (the Department) has reviewed the amended Local Structure Plan (LSP) and associated documents and provides the following comments.</p> <p>The LSP proposes amendments to the distribution of public open space (POS) within the Cardup Brook Precinct, in particular POS adjacent to the Cardup Brook. The Glades at Byford: Cardup Brook East Precinct Preliminary Urban Water Management Plan (JDA, May 2022) and The Glades at Byford: Cardup Brook West Precinct Preliminary Urban Water Management Plan (JDA, May 2022), located at Appendix H of the Local Structure Plan Amendment 11 information package received by the Department, indicate drainage infrastructure such as storage</p>		<p>provision of the DOS to be crucial in delivering a large space for active recreation for the Byford and Cardup community to utilise. It is supported on this basis.</p> <p>Concern has been raised regarding a ground water allocation for the DOS irrigation. The Department of Water and Environmental Regulation (DWER) have expressed concern in their submission on the LSP Amendment outlining that they are not in a position to support the LSP Amendment until such time as a ground water allocation has been secured for the irrigation of the DOS. This needs to be addressed and forms a recommended modification.</p>

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		<p>basins are to be located within the Cardup Brook wetland buffer area. Specifically, drainage infrastructure is proposed within the wetland buffer area in POS 24, 25 and 33.</p> <p>The location of the drainage basins within the Cardup Brook wetland buffer is inconsistent with the approved The Glades at Byford Local Water Management Strategy (LWMS), (JDA, December 2009) which illustrates all drainage infrastructure will be located outside the wetland buffer in the Cardup Brook Precinct.</p> <p>In addition, the Department emailed the Shire, JDA and the Department of Planning, Lands and Heritage on 8 September 2016 stating non-support for drainage infrastructure located within the wetland boundary in response to The Glades at Byford: Cardup Brook East Precinct Urban Water Management Plan (JDA, July, 2016) and The Glades at Byford: Cardup Brook West Precinct Urban Water Management Plan (JDA, July, 2016). The Department's advice was that hard drainage infrastructure is to be located outside of the foreshore reserve buffer, as per the approved LWMS for the site. This can be achieved through a realignment of the POS adjacent to the Cardup Brook buffer and greater use of at-source infiltration higher in the catchment with the use of roadside or median swales, tree pits or raingardens.</p> <p>However, if the Shire of Serpentine Jarrahdale should approve The Glades at Byford: Cardup Brook East Precinct Preliminary Urban Water Management Plan (JDA, May 2022) and The Glades at Byford: Cardup Brook West Precinct Preliminary Urban Water Management Plan (JDA, May 2022) which support</p>		

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<p>IN22/17487  IN22/20314  Main Roads  WA</p>	<p>7.</p>	<p>Please be advised that Main Roads has reviewed the supporting information and is unable to support the Structure Plan in its current form, due to the impacts of the proposal upon the future project area for the extension of Tonkin Highway and connection to Orton Road.</p> <p>A letter response with more detailed comments should follow shortly, it is currently with my manager for review. In the meantime, if you would like to discuss the above or have any queries please don't hesitate to get in touch. Thank you.</p> <p>In response to correspondence received on 14 July 2022 please be advised that Main Roads has reviewed the information and is unable to support the structure plan amendment in its current form.</p>	<p>In response to comments 1-3 below:</p> <p>1. As demonstrated in the TIA, the outcomes of the Sidra assessment for peak times associated with the service commercial sub-precinct confirm there is ample capacity to cater for the full development potential of these land uses. The detailed design of the intersection with Orton Road (road design, intersection form) will vary depending on associated traffic volumes, intersection spacing and network accessibility. The</p>	<p>The Shire is supportive of the northern road connection to Orton Road west of Kokoda Boulevard (Tourmaline Boulevard) and the connection to the east of Tonkin Highway connecting south of Orton Road. Shire Officers support the western most intersection onto Orton Road and view it as crucial in ensuring a high level of community connectivity from the North of Orton Road through to the South and also</p>

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		<p>Main Roads requests the following additional information be provided: Revised Structure Plan document addressing the following:</p> <ol style="list-style-type: none"> <li>1. Removing the northern road connection to Orton Road west of Kokoda Boulevard.</li> <li>2. Restricting the first road connection to the east of Tonkin Highway connecting south of Orton Road to left in-left out only.</li> <li>3. Any other matters that arise as result of the revised supporting technical documents.</li> </ol> <p>Revised Traffic Impact Assessment (TIA), Bushfire Management Plan and Acoustic Report addressing the matters below.</p> <p>The following comments are provided regarding the submitted documentation.</p> <p><b>Traffic Impact Assessment</b></p> <p>Main Roads advises that the Traffic Impact Assessment (TIA) prepared by Riley Consulting dated February 2022 as presented is unable to be supported at this point in time as the impact of development upon the road network is uncertain. An updated report is required to be submitted to Main Roads which addresses the following matters:</p> <ul style="list-style-type: none"> <li>• Project development investigations are currently underway for the extension of Tonkin Highway from Thomas Road to South Western Highway, with the current project concept indicating the ultimate configuration for a connection of Tonkin Highway and Orton Road as a grade separated</li> </ul>	<p>intersection arrangements depicted on the proposed LSP are appropriate and any connection(s) with the MRWA road reservation in the future will be subject to negotiation and confirmation with MRWA at the required stage.</p> <ol style="list-style-type: none"> <li>2. The detailed design of the road network will be considered at a subsequent stage. The concept plan underpinning the LSP and TIA identifies the westernmost connection to Orton Road as LILO.</li> <li>3. Note only.</li> </ol> <p><b>Traffic Impact Assessment</b></p> <ul style="list-style-type: none"> <li>• Refer response to (1) above.</li> <li>• Refer response to (2) above</li> <li>• Refer response to (1) above.</li> <li>• The traffic modelling undertaken references the Cardno district modelling undertaken for the Byford DSP, inclusive of the Cardup Brook precinct. The TIA demonstrates the proposed amendment will have no</li> </ul>	<p>to enable the Service Commercial precinct to have increased connectivity and accessibility by the community and service vehicles. In addition, the intersection creates less impact on lower order streets within the residential areas and maintains permeable traffic flows. It also results in traffic turning movements from Orton Road into the Cardup Brook Precinct to not be transferred down Orton Road to become congested at Kokoda Boulevard, rather, it allows for a more comprehensive distribution of traffic turning into the Cardup Brook Precinct to minimise traffic congestion.</p> <p>Modifications to the Traffic Report, the Bushfire Management Plan and the Transport Noise Assessment have been recommended to address the concerns raised. These technical documents</p>



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		<p>roundabout. Main Roads does not support the northern connection shown to Orton Road west of Kokoda Boulevard.</p> <ul style="list-style-type: none"> <li>• The connection on the south side of Orton Road in proximity to the future grade separation at Tonkin Highway is to be left in-left out only, with a deceleration lane designed to appropriate speed and standards. This is due to the heightened safety risks surrounding merge locations and the proximity of these intersections to the future Tonkin/Orton roundabout. As such, references to connections to Orton Road between Tonkin Highway and Kokoda Boulevard are to be amended within the structure plan documents.</li> <li>• The TIA requires amendment to remove references to the northern connection to Orton Road between Tonkin Highway and Kokoda Boulevard. This includes reference to the roundabout at Tourmaline Boulevard.</li> <li>• Main Roads requests the use of ROM24 data to determine estimated traffic distribution and does not support the use of SATURN modelling. ROM24 data should be referenced to include job no., land use, officer supplied by and date.</li> <li>• The traffic generation presented in Section 9 is uncertain and requires clarification of the traffic impact of the proposal. The net difference in trips generated comparing the land uses in the proposed amendment and the approved structure plan is to be provided.</li> </ul>	<p>significant impact to the local road network when considering the current traffic modelling for the locality. Further modelling is not required.</p> <ul style="list-style-type: none"> <li>• Section 9 traffic generation has been based on the WAPC's guidelines and provides a comparison between the travel demands of the existing and proposed LSP.</li> <li>• Section 9.13 Byford DSP traffic assumptions – the distribution of traffic assumed in the TIA is as per the Byford DSP. We also note that this document has not been approved by the WAPC, however approved by the Shire.</li> <li>• Section 9.14 trip generation rate – this is not common practice and will over estimate the number of trips if based on density. The use of a “per lot trip rate” is more appropriate and accurate based on the estimated yield of the concept plan.</li> </ul>	<p>are to be prepared to the satisfaction of the Shire taking into consideration the issues highlighted in submissions received.</p>

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		<ul style="list-style-type: none"> <li>• Section 9.13 is to be updated to clarify and provide further information on the assumptions of the Byford District Structure Plan (BDSP), as it is unclear how the trip distribution was derived. Please note the revised BDSP is not finalised, and the supporting TIA has issues which remain unresolved.</li> <li>• The Trip Generation Rate utilised in Section 9.14 does not match the development density proposed in the local structure plan. The use of a “per lot trip rate” to estimate the trip distribution is not appropriate in this circumstance and will underestimate trip generation. The proposed trip generation rate does not consider or represent the commercial land use or the proposed R-Code density.</li> <li>• Adequate land should be set aside for road reserve purposes for the construction of roundabouts at potential key intersections, as traffic signal approval may not be granted. The inclusion of signalised intersections in planning documents such as local structure plans does not establish certainty or place any obligation on Main Roads in regard to traffic signal approval.</li> </ul> <p><b>Bushfire Management Plan</b></p> <p>In regard to the Bushfire Management Plan prepared by Emerge Associates, reference EP15-038(12)—024 SCM dated April 2022, Main Roads provides the following comments:</p> <ul style="list-style-type: none"> <li>• Section 5, Part A2.1 ‘Asset Protection Zone’ requires amendment to remove reference of Main Roads</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed LSP does not propose any signalised intersections with respect to development of the LSP area. Land requirements to accommodate channelisation and/or roundabout construction at intersections has been factored into the concept plan underpinning the LSP map and will be reviewed and confirmed at the detailed planning and engineering design stages in consultation with the relevant agency(s). Intersection requirements, upgrades and signalisations if required within the primary regional roads reservation will be the responsibility of MRWA.</li> </ul> <p><b>Bushfire Management Plan</b></p> <ul style="list-style-type: none"> <li>• Section 5, Part A2.1 ‘Asset Protection Zone’ provides comment on the removal of existing vegetation as part of constructing Tonkin Highway and that management of grass</li> </ul>	

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		<p>performing vegetation management within the structure plan area.</p> <p><b>Transportation Noise Assessment</b></p> <p>In regard to the Transportation Noise Assessment prepared by Lloyd George Acoustics, reference 18024303-01E dated 3 March 2022, Main Roads provides the following comments:</p> <ul style="list-style-type: none"> <li>• For future noise reports, please note that Appendix 2 of the SPP 5.4 Guidelines</li> <li>• requires train noise assessment based on a minimum of one train per hour for “freight trains only”. If this number of train movements is applied to a passenger line, it should be noted in the report that it is a proxy for future train volumes, rather than a requirement of SPP 5.4 and its Guidelines.</li> <li>• A “Neighbourhood Node (Residential R80)” residential lot and a “Residential R25” lot in the north-east corner of the assessed Structure Plan area are partly within the SPP5.4 trigger distance from South Western Highway. A noise assessment and notification on title in accordance with SPP 5.4 are required for these lots in relation to traffic noise from South Western Highway.</li> </ul>	<p>fuels in road reserves can occur (as currently occurs in other locations). There is no responsibility in the actions of the BMP related to MRWA being required to manage any assets.</p> <ul style="list-style-type: none"> <li>• The development layout enables lots to be of a depth to enable the ‘development site’ (e.g. ‘the part of the lot on which a building that is the subject of development stands or is to be constructed’, as per the definitions in the Guidelines) to achieve BAL-29 or less regardless of the treatment of Tonkin Highway/water service corridor. The BMP also states as a responsibility that habitable buildings need to be located so that BAL-29 or less applies, which means the developer is required to consider this at each stage of the planning process. Similar to the Tonkin Highway/water service corridor for the existing The Glades development, the required setbacks (currently determined</li> </ul>	

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		<p>Please provide the above information at your earliest convenience, noting that Main Roads will require a 30-day review period once received.</p> <p>As stated above, Main Roads is not able to support the subject proposal until the above information has been received and reviewed.</p>	<p>through Method 1 of AS 3959) could also be further reduced through a Method 2 calculation.</p> <p><b>Transportation Assessment</b>                      <b>Noise</b></p> <ul style="list-style-type: none"> <li>• Dot point 1: noted, required updates can be made to the report if necessary otherwise will be noted for future reports.</li> <li>• Dot point 2: it would appear that the reference to “Neighbourhood Node (Residential R80)” residential lot and a “Residential R25” lot in the north-east corner refers to the existing LSP and not the proposed LSP amendment plan which proposes residential R24-R40 development. Notwithstanding, for lots within the north-eastern corner of the Cardup Brook precinct, we acknowledge the site is within the 300m trigger distance of South Western Highway, however, at 280m, and based on the assessment table (column to the left) noise will be 50 dB LAeq(Day). As such, no notifications on title are</li> </ul>	

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			<p>required for noise associated with South Western Highway.</p> <p>Action (post-SJ Meeting 13/01/22):</p> <ul style="list-style-type: none"> <li>• SJ to arrange meeting with MRWA, SJ and LWP/TBB/Riley Consulting to discuss MRWA response.</li> </ul>	
<p>IN22/20455 Department of Health</p>	<p>8.</p>	<p><b>1. Water Supply and Wastewater Disposal</b></p> <p>In relation to the management of wastewater, it is noted the proposal does not have deep sewerage available for the high-density development at present. However, the DOH has no objection to the proposal subject to all proposed developments being connected to reticulated deep sewerage in accordance with the Government Sewerage Policy.</p> <p>In addition, there is an ever-increasing demand on the existing deep sewerage infrastructure. It is recommended performance criteria including any details of upgrades of the existing wastewater treatment plants, pump stations and other wastewater infrastructure are provided to the department. This should be from the service provider, developers and Local Government to ensure the additional volumes can be accommodated and prevent system failures thereby increasing public health safety.</p> <p><b>2. Public Health Impacts</b></p> <p>The DOH has a document on '<i>Evidence supporting the creation of environments that encourage healthy active living</i>' which may</p>	<p><b>1. Water Supply and Wastewater Disposal</b></p> <p>Noted, and it is understood that it is the responsibility of the developer to provide water and sewerage reticulation as required. Any contributions towards water, sewerage and drainage headworks/funding will be subject to discussions with Water Corp at the subsequent detailed engineering stages.</p> <p>No further action is required as part of the proposed LSP Amendment.</p> <p><b>2. Public Health Impacts</b></p> <p>Noted, no further action is required</p>	<p>The provision of reticulated water and sewer is the responsibility of the developer and required to be extended through to the Cardup Brook Precinct. Discussion will need to be had with the Water Corporation as the Shire is not responsible for delivering these services.</p> <p>The LSP Amendment provides a large area of District Open Space to service the Cardup Brook community and broader Byford and Cardup communities. In addition to this DOS, the Amendment area provides a number of small areas of POS</p>

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		<p>assist you with planning elements related to this structure plan. A copy may be downloaded from:</p> <p><a href="https://ww2.health.wa.gov.au/Articles/F_1/Health-risk-assessment">https://ww2.health.wa.gov.au/Articles/F_1/Health-risk-assessment</a> The Shire of Serpentine Jarrahdale should also use this opportunity to minimise potential negative impacts of the increased density development such as noise, odour, light and other lifestyle activities.</p> <p>To minimise adverse impacts on the residential component, the Shire of Serpentine Jarrahdale could consider incorporation of additional sound proofing / insulation, double glazing on windows or design aspects related to location of air conditioning units and other appropriate building/construction measures such as ensuring adequate ventilation requirements for wet areas.</p> <p>Further design elements that should be considered include:</p> <ul style="list-style-type: none"> <li>• A range of quality public open spaces should be provided to contribute towards the recreation, physical activity, health and social needs of the community.</li> <li>• Parks and open spaces should be located within walking distance of most residents along well-lit connected routes and be co-located with other community facilities to encourage access by walking or cycling.</li> <li>• The design of parks and open space and the infrastructure provided within them should cater for a variety of users to undertake a mix of activities that increase physical activity, provide access to healthy nutritious foods (though community gardens) and prevent injury.</li> </ul>	<p>as part of the proposed LSP Amendment.</p> <p>With regards to comments relating to POS, a fundamental design requirement which has guided the LSP Amendment has been the provision of a centralised active area of open space and, as a result the provision of smaller areas of passive open space throughout the precinct, connected through green links to optimise pedestrian and cyclists connections.</p> <p><b>3. Medical Entomology</b></p> <p>There have been no potential issues identified at preceding stages of the planning process and the site is not adversely affected by mosquitoes.</p> <p>Should mosquito nuisance/management be raised as an issue at the subdivision stage, this will be considered at the appropriate time.</p> <p>No further action is required as part of the proposed LSP Amendment.</p>	<p>able to be used for passive recreation.</p> <p>The final design of parks and the facilities they provide are subject to further detailed design work at the time of subdivision.</p> <p>The Amendment area has also been subject to a Transport Noise Assessment which outlines noise mitigation measures that needs to be considered and applied to homes subject to excessive noise.</p> <p>The Shire monitors mosquitos in areas subject to inundation to ensure their number are not a nuisance or disease carrying. The Shire will work with the applicant if mosquito management is raised at subdivision stage.</p>

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		<p><b>3. Medical Entomology</b></p> <p>The subject land is in a region that occasionally experiences significant problems with nuisance and disease carrying mosquitoes. These mosquitoes can disperse several kilometres from breeding sites and are known carriers of Ross River (RRV) and Barmah Forest (BFV) viruses. Human cases of RRV and BFV diseases occur annually in this general locality.</p> <p>The subject land is also within 3km of mosquito dispersal distance from mosquito breeding sites. Mosquitoes will disperse from these sites to the subject land under favourable environmental conditions. There may also be seasonal freshwater mosquito breeding habitat within proximity to the subject land. Additionally, there is the potential for mosquitoes to breed in on-site infrastructure and constructed water bodies if they are poorly designed.</p> <p>Prior to development, the DOH recommend a mosquito management plan (MMP) be developed and approved by both the DOH and the Local Government in which the proposal is based to ensure the risk to the community of exposure to nuisance and/or disease carrying mosquitoes is considered. This MMP is to be approved by the local government and Department of Health prior to any subdivision.</p> <p>The DOH has provided guides and templates for the development of suitable mosquito management Plans to assist land developers meet these requirements. Please see: <a href="https://www.health.wa.gov.au">Mosquito management (health.wa.gov.au)</a> for additional support.</p>		

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IN22/15717 M & C Benvenuti 1379 Orton Road, Byford	9.	We are ear marked for area C development. Guess it to be in conjunction with this proposal. When is it likely to happen. We will be moving on when the time comes.	No action required.	Lot 1379 Orton Road is located within the Doley Road Precinct Local Structure Plan and as such will be developed further under the guidance of that local structure plan. The Amendment to the Glades Local Structure Plan is for the area south of Orton Road. The timing of the implementation of the LSP is dependent on the applicant.
IN22/14659 L. Palmgren 3 Pirie Road Byford	10.	I think this is a great proposal. Shops and a park is a must and this has both.	No action required.	It is important that the LSP amendment provides the necessary and essential amenities to provide for the communities need.
IN22/17266 190 Cardup Siding Road, Byford T. van den Dries	11.	My comment is regarding No. 4 neighbourhood connector Road:  Firstly, a bridge for vehicles to use the 'connector Road' will need to be constructed, this will have significant impact  Number 4 NEIGHBOURHOOD CONNECTOR ROAD  1. A bridge over Cardup Brook for vehicles to use the 'connector road' will need to be constructed. This will have a significant environmental impact on the wildlife because a	It is acknowledged that crossing of the brook is required by the State Government in accordance with their Strategic Planning document Perth and Peel @ 3.5m in order to facilitate the extension of Doley Road, however this is outside of the LSP area and the need for this extension/crossing is not generated by The Glades LSP.	1. The extension of Doley Road through the amendment area and the construction of the crossing of Cardup Brook is an important provision of access. It will provide safe access to and from development south of the Brook. Cardup Siding Road will be shut off, with no access



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		<p>large quantity of native trees will be removed. This will result in habitat loss and degradation for threatened birds, such as the Black Cockatoos (dpaw.wa.gov.au). The trees are well established and replanting new seedlings does not replenish what will need to be removed.</p> <p>2. The construction of this 'connector road' will create more vehicles using Cardup Siding Road on a daily basis. When Tonkin Highway is constructed a significant amount of vehicles each day will exit Tonkin Highway onto Orton Road and use the 'connector road' as a short-cut to access South Western Hwy and Soldiers Road. This will have a detrimental impact on the native fauna and flora, such as bandicoots, kangaroos and other native wildlife that reside in the area and the 'Bush Forever' site on Cardup Siding Road.</p> <p>3. The previous LSP proposal was for no 'connector road' and the only access to Cardup Siding Road would be via Soldiers Road. When Tonkin Highway is constructed at the west end of Cardup Siding Road it will become a 'no through' road therefore creating only local traffic to use Cardup Siding Road.</p> <p>4. I do not have an issue with the 'Cardup Brook Precinct' development because we knew that this was planned, however; the block sizes are small than originally planned and therefore this will have more of a negative impact on the native flora and fauna. There are regular sighting of kangaroos, bandicoots and other wildlife around our property which unfortunately a main threat is road mortality.</p> <p>5. A significant increase in residence in the area will also have</p>	<p>1. To facilitate this connection/crossing there is substantial further detail required such as the relevant environmental, heritage and engineering studies (the responsibility of others).</p> <p>2 &amp; 3. This connection is consistent with the Byford Traditional DCP, Byford DSP (2020) and district road planning. The alignment of Doley Road is also consistent with the approved LSP, with the crossing of the brook falling outside of the LSP area.</p> <p>4 &amp; 5. The proposed residential density for the LSP Amendment area and resultant lot yield is in keeping with the approved existing LSP and is not expected to have any detrimental impact on flora and fauna of the locality with key areas of vegetation on site will be retained under the modified LSP. The proposed residential density and development outcome will result in increased housing choice and more affordable housing options for future</p>	<p>onto Tonkin Highway. The extension of Doley Road over the Cardup Brook is therefore necessary to provide accessibility and permeability throughout Byford and provide additional emergency access for those living within the Cardup Brook precinct. The crossing and Doley Road extension is the responsibility of others and subject to further detail design.</p> <p>2 &amp; 3. The applicant has provided a Traffic Report in support of the amendment. The Doley Road extension will provide greater accessibility to Byford and surrounding areas to those living south of the Brook. The extension of Doley Road is consistent with the Byford District Structure Plan.</p> <p>4 &amp; 5. The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has</p>

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		<p>a negative impact on the Cardup Brook, as well as have a negative impact on the aesthetics of the area with the removal of the native trees and plants.</p>	<p>residents and is consistent with the existing planning framework.</p>	<p>been some re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.</p>
<p>IN22/17085 Richard Noble on behalf of Cardup Investments Pty Ltd</p>	<p>12.</p>	<p>Richard Noble acts on behalf of Cardup Investments Pty Ltd, the owner of Lot 33 Hopkinson Road, Cardup (Lot 33), located south of the Cardup Brook Precinct. Richard Noble has been progressing the planning of Lot 33 in the form of a draft Structure Plan in consultation with the key stakeholders.</p> <p>Richard Noble supports the proposed amendments to The Glades LSP as it will play an important role in facilitating the provision of community facilities and services, local retail and commercial conveniences and amenity for the future community of Lot 33 and the broader Byford area. The preparation of the draft Structure Plan for Lot 33 has taken into consideration the</p>	<p>No action required.</p>	<p>Noted.</p> <p>Doley Road is planned to be extended south from The Glades Estate located to the north, crossing over the Cardup Brook to connect to the Lot 33 Hopkinson Road LSP area. This will provide an important transport connection for the Structure</p>

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		<p>structure planning for the Cardup Brook Precinct as envisaged by Amendment No. 11.</p> <p>Some detailed aspects are discussed in further detail below.</p> <p><b>Service Commercial Sites</b></p> <p>The introduction of a ‘Service Commercial’ sub-precinct within the western portion of the Cardup Brook Precinct is supported. The large format retail and bulky goods/showroom uses will support the surrounding residential population and wider trade area.</p> <p>The proposed location is considered appropriate to capture passing trade from the future extension of Tonkin Highway and at a key location at the interchange with Orton Road.</p> <p>The proposed non-residential land uses are complementary to other existing or planned centres/non-residential floorspace in the area and, therefore, will not undermine the viability of these facilities.</p> <p>The proposed alignment of Doley Road as depicted on the LSP is supported. Consideration will need to be given to the process to facilitate this new road reservation. The alignment and design of Doley Road as a ‘boulevard’ type road is supported and will provide an important connection from Orton Road to the Cardup Brook Precinct and future urban development areas to the south.</p> <p>Based on recent negotiations with LWP involving Main Roads WA and the Shire, the upfront construction of the portion of the Doley Road within The Glades LSP area will be the</p>		<p>Plan area and the Byford Town Centre.</p> <p>Main Roads have advised that the Doley Road south link was agreed to be provided for bushfire emergency egress to the east and to provide access to the proposed development south of Cardup Siding Road. Main Roads has advised that it will construct the Doley Road south connection to a desirable minimum road cross section consistent with the developer’s ultimate proposal. Widening including the installation of utility services requirements will be the responsibility of the developer.</p>

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IN22/17305 J & L De Jager	13.	<p>responsibility of Main Roads WA.</p> <p>Below are our objections to the proposed amendment to The Glades Local Structure Plan (LSP).</p> <p><b>Proposed change in R coding, and resulting increase in dwelling density, is inconsistent with both the approved The Glades LSP and the existing adjacent Byford By The Brook development.</b></p> <p>As per section 9.3.3 <b>Density control</b> of the WAPC <i>Residential Design Codes Explanatory Guidelines 2021</i></p> <p>“For existing urban areas the process of allocating an R-Code in a scheme requires careful assessment of the relationship between the lot sizes prevailing in a locality”</p> <p>And also 9.3.4 <b>Changes in housing density</b></p> <p>“Development sites should respect adjoining properties where land use or zoning differs, particularly where two residential lots with different R-Coding’s adjoin”</p> <p>The current approved LSP, its previous revisions, and past plans and documents contain several groupings of lower density lots along the boundary to neighbouring Byford By The Brook. These would serve as a buffer and transition between the higher density The Glades development to the north and Byford By The Brook zoned R2.5 and wider Cardup rural residential area to south. The proposed amendment will not provide that transition buffer.</p>	<p><b>Proposed change in R coding, and resulting increase in dwelling density, is inconsistent with both the approved The Glades LSP and the existing adjacent Byford By The Brook development.</b></p> <ul style="list-style-type: none"> <li>• Density Control – the allocation of residential density code ranges for the Cardup Brook precinct is in keeping with the residential density under the existing approved LSP. It is acknowledged that the existing LSP identifies lower residential densities (R15) along the brook, however in response to the modified LSP needing to respond to the density targets of the State Government, more contemporary planning framework of the Shire and market demand. There is negligible impact on yield between the existing approved and proposed LSPs, and a small reduction in yield across the Cardup Brook precinct. The R20-R40 density code range provides the opportunity to accommodate</li> </ul>	<p>The Shire understands that the density code ranges have changed somewhat from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface</p>

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		<p>The proposed amendment in fact suggests similar reasoning for changing R code of Icaria Stages 13 and 14 from R80 down to R25 due to its proximity to other areas coded R25.</p> <p>The LWP material provided for the Byford By The Brook development, and the restrictive covenants placed on lots within, depicted a semi-rural lifestyle development. For example the boundary fencing stipulated and as installed by LWP is 'open rural fencing', is inconsistent and incompatible with the proposed medium/high density coding adjacent. The low and open rural fencing installed was appropriate for 'semi-rural' setting with low density and sparse local foot traffic, but is not suited to medium density more 'urban' setting.</p> <p>With regard to the WAPC <i>Designing Out Crime Planning Guidelines 2006</i> there are areas of concern where there is a mismatch between existing development and the proposed LSP.</p> <ul style="list-style-type: none"> <li>• 5.5 Building design, including boundary definition – fencing provided and stipulated for By The Brook inadequate for high density development adjacent to it, provides opportunity for entering rear of properties whilst shielded from view of larger development and street - (will this act against us? Create desire to remove vegetation to improve passive surveillance?)</li> <li>• 5.6 Lighting – Current Byford by the Brook multiuse path has no lighting of the associated public space</li> </ul>	<p>larger homes as a transition from existing development along the brook and in response to market demand.</p> <ul style="list-style-type: none"> <li>• Changes in housing density – appropriate interface with adjoining residential development of a lower scale and density will be appropriately managed on a street block-by-street block basis. The brook, in itself, provides appropriate separation and landscape relief between existing residential development and the Cardup Brook precinct. This does not have to be to the detriment of the surrounding residential neighbourhood, particularly through achieving appropriate built form outcomes, controlled by Local Development Plans (LDP). With regards to restrictive covenants (Design Guidelines) for the Cardup Brook precinct, these will be prepared by LWP at the time of release of lots to the market and be specific to the desired character for each sub-precinct. Open-style (permeable)</li> </ul>	<p>appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.</p> <p>The following locational criteria is recommended:</p> <p>The allocation of residential densities shall be in accordance with the following locational criteria:</p> <p>a) R40-R60 shall apply as shown on the Structure</p>

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		<p><b>No outline for density ratios or guidelines for implementation of proposed change to R20-40 and R40-60 'dual coding' density</b></p> <p>The proposed amendment to change the density R codes over the majority of the Cardup Brook Precinct to dual coding R20-40 (or R40-60) doesn't outline any ratio of what the final density codes will be. Nor does it specify what requirements, approval and consultation process, if any, need to be met in order to use the higher R40 or R60 density codes in place of the default R20 and R40 in the dual coding.</p> <p>The final built form and function of a development consisting a higher ration of R20 and R40 density will be vastly different to one consisting mainly of R40 and R60 lots. The completed urban water management plan would also likely differ significantly across those two scenarios.</p> <p><b>Conflicting statements regarding revegetation of Resource Enhancement Wetland and associated buffer</b></p> <p>Appendix B <i>The Glades – Cardup Brook Landscape Concept Plan</i> (Plan E 2022) and <i>Attachment E Public Open Space Landscape Strategy Plan</i> - allude to the "RESOURCE ENHANCEMENT WETLAND BUFFER POS" having "Non-irrigated revegetation planting to degraded areas". However, in multiple other instances throughout the proposal relating to the Bushfire Management Plan it states that "This buffer area is</p>	<p>fencing is a standard requirement for all lots abutting POS.</p> <ul style="list-style-type: none"> <li>• Increase in crime and anti-social behaviour as a result of changes in residential density is not a relevant planning consideration. The LSP layout complies with CPTED requirements to optimise surveillance and the design of the public realm will reflect CPTED principles including provision of appropriate lighting. Built form design outcomes will ensure passive surveillance of the public realm. This will be achieved through the provision of permeable fencing for all lots abutting POS.</li> </ul> <p>Action (post-SJ Meeting 13/01/22):</p> <ul style="list-style-type: none"> <li>• Additional density criteria required to address interface with brook and nearby lower density development, and optimise local character.</li> </ul> <p><b>No outline for density ratios or guidelines for implementation of</b></p>	<p>Plan map in areas of high amenity including areas abutting Public Open Space and higher order streets.</p> <p>b) The R40 density code may apply to 'Residential' zoned lots where a consistent R-Code is applied per street block or along streets, and where one or more of the following applies:</p> <ol style="list-style-type: none"> <li>The lot is located within a 100m walkable catchment of an area of public open space, excluding the area identified as R15 abutting the Cardup Brook Foreshore Reserve.</li> <li>The lot is located within a 100m walkable catchment of a planned local centre; or</li> <li>The lot is located within a 100m walkable</li> </ol>

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		<p><b>not</b> intended to be revegetated with non-irrigated revegetation planting to degraded areas."</p> <p><b>Consolidation and relocation of POS will result in likely clearing of mature native trees that are food source for protected fauna and other displaced wildlife</b></p> <p>Changes to the POS /DOS design from current approved LSP will likely result in clearing more than a dozen mature native trees that are a food source for vulnerable and endangered species, including species of Black Cockatoo that <b>have been observed on numerous occasions feeding in this area</b>. Many of these trees range from approx 150 to over 300 years in age and are irreplaceable within the next few generations. Below is satellite overlay images "LWP approved POS plan" and "LWP proposed POS plan". The proposed DOS area contains no mature trees of this nature.</p> <p><i>Refer Briefing note - Estimating tree age in jarrah and marri Kim Whitford Science Division Department of Environment and Conservation for method of age approximation</i></p> <p><b>The Glades, Byford Revised Local Structure Plan January 2019</b> - Statements made under section 4.9.2 <b>PREVIOUS ON-SITE BLACK COCKATOO INVESTIGATIONS</b> that feeding was not observed on nearby sites and so there was no evidence of Black Cockatoo's feeding in the area. Those statements are misleading and incorrect in relation to the area surrounding Lot 9000 and the Cardup Brook reserve (refer video footage published on Youtube, links provided below).</p> <p>Videos of Black Cockatoos and remnant native trees</p>	<p><b>proposed change to R20-40 and R40-60 'dual coding' density</b></p> <p>The LSP Amendment proposes residential density ranges as opposed to dual coding. Consistent with the WAPC's Structure Plan Guidelines (2015), lot-specific residential densities will be assigned in accordance with a Residential Density Code Plan approved by the WAPC at the subdivision stage and guided by the criteria outlined in the LSP Amendment submission. The general density distribution throughout the LSP area is appropriate and justified on the following basis:</p> <ul style="list-style-type: none"> <li>• Medium density areas are provided adjacent to areas of amenity such as POS and the Cardup Brook foreshore area.</li> <li>• Medium density areas are located adjacent to areas with high accessibility and adjacent to Orton Road where there is likely to be the provision of bus stops and a public transport route.</li> </ul>	<p>catchment of a planned Primary or High School.</p> <p>c) The R15 density code shall apply to lots as shown on the structure plan map where fronting the Cardup Brook foreshore reserve and associated Public Open Space.</p> <p>Development is subject to further detailed design at subdivision stage where principles of crime prevention through environmental design (CPTED), which are encouraged for all development. Passive surveillance, lighting and sightlines are all considerations taken at the detailed subdivision stage to address safety concerns.</p> <p>The LSP Amendment has introduced residential density ranges consistent with WAPC's Structure Plan</p>

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		<p><a href="https://youtu.be/W9Wm6SXJW1g">https://youtu.be/W9Wm6SXJW1g</a>  <a href="https://youtube.com/shorts/XTQceARcWI4">https://youtube.com/shorts/XTQceARcWI4</a>  <a href="https://youtube.com/shorts/wwVpxizUoSQ">https://youtube.com/shorts/wwVpxizUoSQ</a></p> <p>Also, in Section 6.4.7.4 <i>KEY LANDSCAPE FEATURES - PARKLAND CORRIDOR TREE RETENTION - POS</i> area 34 shown on Figure 13 was to be established to retain "significant stands of remnant vegetation".</p> <p>However, within the amendment proposal (eg page 5 of the <i>Bushfire Management Plan BMP</i>) it's incorrectly claimed that "no remnant native vegetation exists elsewhere" besides within Cardup Brook. The BMP also describes these as "remnant isolated paddock trees"</p>	<ul style="list-style-type: none"> <li>The distribution of medium density is consistent with the recommendations of LN.</li> </ul> <p>The UWMP (and all other technical reports) have been based on more detailed concept plan underpinning the LSP Amendment which proposes a subdivision outcome that can be achieved based on the proposed LSP framework.</p> <p><b>Conflicting statements regarding revegetation of Resource Enhancement Wetland and associated buffer</b></p> <ul style="list-style-type: none"> <li>The Landscape Masterplan and BMP were prepared in collaboration and are therefore based on the same assumptions. The BMP was very conscious of needing to ensure the proposed treatments for Cardup Brook and the buffer were accommodated in the assessment of bushfire hazards. The wetland and buffer are assumed to be long-term bushfire hazards.</li> </ul>	<p>Guidelines. Specific residential densities will be assigned at the further detailed design phase and approved by the WAPC. Shire Officers have recommended further locational criteria to ensure the appropriate distribution and allocation of density codes.</p> <p>The conflicting statements regarding the revegetation of the Resource Enhancement Wetland and 30m buffer has been requested to be amended as a modification to the Bushfire Management Plan and the Landscape Management Plan to provide clarity and ensure that the wetland buffer is revegetation appropriately with native plant/tree species.</p> <p>Much of the vegetation within the LSP amendment area is proposed to be retained within the Cardup Brook Foreshore buffer (30meters). The redistribution of the POS and</p>



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			<ul style="list-style-type: none"> <li>• The 'Resource Enhancement Wetland Buffer POS' incorporates the buffer as well as Cardup Brook (the resource enhancement wetland). Therefore the descriptions of treatments may apply to either the buffer or the Brook itself. No existing native vegetation associated with the mapped resource enhancement wetland is proposed to be removed.</li> </ul> <p><b>Consolidation and relocation of POS will result in likely clearing of mature native trees that are food source for protected fauna and other displaced wildlife</b></p> <ul style="list-style-type: none"> <li>• It has been at the Shire's request that a consolidated regular shaped area for active district open space is provided by LWP in the Cardup Brook precinct in response to a Community Needs assessment to meet active recreation demand for the area. This outcome has been the result of many years of consultation and negotiation with the Shire. As a result, there has been a shift in the distribution and allocation of POS between the</li> </ul>	<p>the inclusion of the DOS may result in the removal of some existing vegetation. However, at the time of subdivision, conditions will be recommended for measures to be undertaken to protect vegetation worthy of retention and potential habitat or foraging trees for threatened fauna species. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.</p>

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			<p>adopted LSP and the modified LSP to achieve the desired outcome of the Shire (recognising there is already an oversupply of POS across the LSP). Notwithstanding, the proposed LSP provides for localised POS areas where possible to serve the residential community.</p> <ul style="list-style-type: none"> <li>• In order to meet the size and locational requirements of the DOS as stipulated by the Shire, the siting of the DOS has had to be carefully considered. The design of the facility, including location of sporting fields/ovals to ensure unconstrained areas for active play, will be undertaken by the Shire. However, there are opportunities for the active recreation components of the site to transition to areas of passive and vegetated local open space and the brook to the south.</li> <li>• Environmental appraisal / black cockatoo habitat – It is considered unnecessary to update this documentation given the key areas of vegetation on site will be retained under the modified LSP and the</li> </ul>	

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			Cardup Brook Foreshore buffer is retained.	
<p>IN22/17310  A. J. Speedy  27 Macleod Close, Byford</p>	14.	<p>As residents (home owners) living in close proximity to the potential changes to plans for the Cardup Brook Precinct, we would like to provide feedback.</p> <p>We aren't happy with the proposed changes in a number of areas.</p> <p>Smaller lots meaning higher density does not fit within the Cardup Brook precinct as advertised when the area was being developed originally (south of Cardup Brook) where it is lower density, and larger lots. It should be developed as planned, not keep changing the plans to make more money. Development needs to fit in with the area.</p> <p>It will impact on open spaces, wildlife and probably the health of the Brook itself.</p> <p>These are just a few examples that need further explanation before granting approval.</p> <p>We would urge the Shire to consider the numerous factors involved before approving amendments to the Cardup Brook Precinct Local Structure Plan.</p>	<p>The proposed change in residential density along the brook from R15 under the existing LSP to R20-R40 is appropriate to the context and consistent with the recommendations of LN and appropriate with respect to achieving density targets of Perth and Peel @3.5M and the Shire's recently adopted Local Planning Strategy.</p> <p>It is not intended that the scale of development will detract from the amenity of the locality along the brook.</p> <p>The change in lot yield across the LSP as a result of the LSP amendment is negligible. The range in density codings across the LSP area is capable of supporting various lot typologies.</p> <p>The changes in residential density will not have any detrimental impact on any environmental qualities of the area and can be appropriately</p>	<p>The Shire understands that the density code ranges have changed somewhat from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p>

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			managed and enhanced through the retention of key areas of vegetation on site and retention of the Cardup Brook foreshore buffer.	The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.
IN22/17391 R & C Fawcett 29 Culham Vista Cardup	15.	We believe the block sizes adjacent to the creek should be no less than 2000 square metres. That would be the same as properties on the south side of the Cardup Creek. People like a mixture of small and large blocks.	Residential density – refer to comments at (14), (15) & (17).	The Shire understands that the density code ranges have changed somewhat from what was originally proposed in the Glades Local Structure Plan (LSP).

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				<p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with</p>

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				the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.
IN22/17512 J & D McConnell 6 MacLeod Close, BYFORD	16.	<p>For context my husband and I have a home in MacLeod Close that backs onto the Cardup Siding Brook. We recently received a Development Application Letter (dated 14 July 2022) on a proposal to amend the approved Glades, Byford Local Structure Plan (LSP) for the Cardup Brook Precinct, Lots 9000,9001 and 9060 Orton Road, Byford.</p> <p>After viewing the proposed amendments:</p> <ul style="list-style-type: none"> <li>• Revised road layout</li> <li>• Re-distribution of residential densities and introduction of density code ranges</li> <li>• Refinement of Public Open Space distribution and location and incorporation of District</li> <li>• Open Space facility; and</li> </ul>	<p><b>Lot Densities</b></p> <p>The allocation and distribution of residential density between the existing and proposed LSP is not fundamentally different. As discussed, the change in lot yield across the LSP area is negligible and indicative lot yield for the Cardup Brook precinct slightly less than envisaged under the existing LSP. The introduction of residential density code ranges is in keeping with standard contemporary practice with lot specific densities determined at subdivision stage and approved by the WAPC. Given the longevity of subdivision/development across the precinct, it</p>	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of</p>

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		<ul style="list-style-type: none"> <li>Rationalisation of existing mixed use and neighbourhood node sites, and identification of new mixed use and service commercial sites;</li> </ul> <p>I have major concerns, and they are detailed as follows:</p> <p><u>Lot Densities</u></p> <p>The proposal to amend the overall lot sizes to a higher R-code is not acceptable. These types of developments with a higher lot density are only suitable in inner city suburbs, not here Byford, especially in a location on the Cardup Siding Brook. The proposed amendments have changed considerably from the approved "LSP Plan 06/014/131R", and show the allocation of lots by combining lots into groups of Residential R20-R40, Residential R40-R60 instead of identifying each R-code individually. This does not give clarity in relation to the final density (lot sizes) within the Precinct. I also believe that by combining densities in this way is confusing at best and deceptive at worst. The difference between R20-R40 is considerable in terms of lot size, as is also the case with R40-R60. I understand that due to Planning changes this is now permitted, but this does not give us detailed accurate information on which we are able to make a more informed comment. Also, this gives the Developer the ability to allocate lot sizes at will, and could mean that over 90% of the lots could end up being R40 with a minimum of 180sqm with an average of 220sqm.</p> <p>I propose the approved "LSP Plan 06/014/131R" be retained and the proposed amendments regarding changes to lot sizes be rejected.</p>	<p>is fair and reasonable for subdivision and development to unfold in response to market conditions.</p> <p>Refer to additional comments at (14) and (15) above.</p> <p>On-street Parking – the provision of on street parking is a detailed design matter and will be determined at the subdivision and engineering design stages. The design of the local road network is capable of supporting on-street visitor parking requirements.</p> <p><b>Public Open Space</b></p> <p>For the reasons outlined at (14) above, the provision of active open space has been appropriately accommodated in response to the Shire's request for a DOS facility; especially as a result of there not being a significant shift in the overall provision of POS between the adopted LSP and the modified LSP which currently provides an overprovision of the minimum 10% requirement. The final development and intended use for each POS</p>	<p>densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>While the Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework, it is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to</p>

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		<p>In the approved "LSP Plan 06/014/131R", the residential lots directly facing Cardup Siding Brook are R15, which is much larger than the rest of the residential lots in the proposed amendments. On the day in 2006 we purchased our lot in Byford by the Brook the Developer's representative indicated that this would be the case, ie the lots in the Cardup Brook Precinct facing the Brook would be much larger in size compared to the rest of the lots within the development. In the Glades Estate, a precedent has already been set with regards to allocating larger sized lots. The lots in question are located on the south side of Abernethy Road and are a mix of Residential RIO and Residential R12.5, are directly opposite a large lot development on the north side of Abernethy Road.</p> <p>I propose all the lots directly facing the Brook are developed as either Residential RIO or Residential 12.5. One of the prerequisites to us choosing our lot was based on the lots directly facing the Brook in the new Cardup Brook Precinct development being larger in size compared to the rest of the lots within the development. This I believe will also significantly enhance the connectivity between the Cardup Brook Precinct and the Byford by the Brook Estate.</p> <p>I would like to comment on the current lack of on-street parking within all of the Estates in Byford. Adequate on-street parking becomes essential when there is insufficient parking for more than two vehicles on the majority of the lots within these Estates, and those two vehicles are predominantly parked in the homes garages. Adult children with a car, visitors, contractors, etc. have nowhere to park and are forced to rely on on-street parking. This</p>	<p>area will be determined at subsequent design stages, however the function of the POS areas provides an appropriate balance between active and passive recreation and areas required for the provision of drainage infrastructure.</p> <p>Refer to additional comments at (14) above.</p> <p><b>Service Commercial</b></p> <p>As demonstrated by the Retail Needs Assessment (RNA) in support of the LSP Amendment, the Cardup Brook precinct is considered appropriate to support retail and bulky goods/showroom uses for the following reasons:</p> <ul style="list-style-type: none"> <li>• The site is strategically located at the future Tonkin Highway interchange and is able to capitalise on passing trade</li> <li>• Will provide local convenience based retail to support the local residential community and wider catchment</li> </ul>	<p>interface with development south of the Brook.</p> <p>The LSP Amendment has introduced residential density ranges consistent with WAPC's Structure Plan Guidelines. Specific residential densities will be assigned at the further detailed design phase and approved by the WAPC. Shire Officers have recommended further locational criteria to ensure the appropriate distribution and allocation of density codes.</p> <p>The applicant has provided a Retail Needs Assessment to accompany the LSP Amendment and justifying the identification of 'Service Commercial'. While the LSP Amendment predominately proposes residential development, the inclusion of a Service Commercial precinct aligns with the Byford</p>



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		<p>then becomes a problem, as there just is not enough on-street parking.</p> <p>I propose that in the detailed design phase, this issue is earnestly addressed to ensure that the maximum number of parking bays are allocated on all the streets within the Cardup Brook Precinct.</p> <p><u>Public Open Space</u></p> <p>The proposed amendments I believe have resulted in a considerable reduction in the allocation of Public Open Space. A large portion of the allocated space is only suitable for drainage, especially west of the proposed Doley Road extension, due to the steep incline down to what is no more than a flood plain for the Cardup Siding Brook, and will need to be developed as such. As per "Attachment E Public Open Space Landscape Strategy Plan (page 115 of the detailed proposal) approximately two thirds of the Public Open Space is now assigned as "Foreshore Drainage POS". Reading the explanation of how these areas are to be developed it becomes obvious that on the whole a large portion of these areas will only be suitable for passive recreation, ie. walking/jogging the paths and sitting and enjoying the views on the seating provided.</p> <p>As the proposed lot density is so high, and the majority of these lots are so small, you ultimately end up with homes that take up most of the lot leaving minimal outside area for green space and recreation. This being the case, it is even more important that a more balanced ratio of the number of lots created be directly proportional to the amount of usable Public Open Space</p>	<ul style="list-style-type: none"> <li>• Support the demand for large format retail activity in the South-East region</li> </ul> <p><b>Conservation of Habitat Trees</b></p> <p>Refer to comments at (14) above.</p> <p><b>Management of Storm Water into the Cardup Siding Brook from the Cardup Brook Precinct</b></p> <ul style="list-style-type: none"> <li>• Volume of storm water being discharged into the Cardup Siding Brook: The UWMP has been based on a more detailed concept plan underpinning the LSP Amendment which confirms suitability of the development of the land for its intended purpose. The proposed drainage regime as documented in the UWMP is consistent with the principles of the approved LWMS and will be subject to assessment and approval by the Shire and DWER. As noted, the indicative yield outcome under the proposed LSP is in keeping with (in fact slightly less) than the approved LSP.</li> </ul>	<p>District Structure Plan, with this area being identified for a 'Neighbourhood Centre'. The service commercial sub-precinct will accommodate large format retail development comprising of bulky goods showrooms, showrooms, and large format retail. The site has been strategically located, abutting both Orton Road and Tonkin Highway to enable the service commercial site to have heightened exposure and a high degree of accessibility with the surrounding serviceable catchment.</p> <p>A modification has been recommended to ensure that the interface of the service commercial area interfaces sensitively to preserve amenity to the surrounding residential areas.</p> <p>Much of the vegetation within the LSP amendment area is proposed to be retained within the Cardup Brook Foreshore</p>

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		<p>available, ie "Foreshore Park pas" or "Neighbourhood Park / Street".</p> <p>I propose that the approved "LSP Plan 06/014/131R" be retained and the proposed amendments be rejected.</p> <p><u>Orton Road District Open Space Facility - DOS</u></p> <p>With regards to this Facility, I have concerns where those attending this Facility are going to park. An on-site car park is not shown on the proposed Plan. Parallel on-street parking on Orton Road (a major feeder road) and the two roads to the east and west of the Facility will not be sufficient to service this Facility. One has only to attend the Mead Street Facility on a Friday night to see just how much parking is required. Also is there going to be sufficient area on the allocated site for amenities such as Public Toilets/Change Rooms, Club Rooms, etc. that are required for these types of facilities? If there is not enough space for an on-site car park and sufficient amenities. I propose that the Developer allocate more area for this Facility. If this is not possible, perhaps look at keeping the location of the DOS as it is in the approved "LSP Plan 06/014/131R" and ensure there is enough space for sufficient on-site parking and amenities. It should also be noted that if any additional space is required, in both the amended design and the proposed design, this should absolutely not be achieved by taking from the "Foreshore Park pas" allocation to the south of these Facilities.</p> <p><u>Service Commercial</u></p> <p>My only comment on this sizeable allocation of a Service Commercial development on Orton Road (south west), is that</p>	<ul style="list-style-type: none"> <li>• Environmental Issues arising from the discharge of storm water into the Cardup Siding Brook: consistent with the principles of the approved LWMS, the UWMP promotes environmentally responsive and best practice water management responses to ensure that groundwater quality is not compromised. The proposed drainage regime will include the use of subsoil drainage systems to allow water treatment prior to discharge into the brook.</li> </ul> <p><b>Access between Cardup Brook Precinct and Byford by the Brook</b></p> <p>The pedestrian crossing points referred fall outside of the LSP area. The proposal does not involve the removal of these pedestrian crossings, yet enhancement of the public realm north of the brook as a result of the proposed development will only provide for additional pedestrian connections along the brook. The landscape design for areas along the brook will take into consideration the broader context and network of pedestrian paths</p>	<p>buffer (30meters). The redistribution of the POS and the inclusion of the DOS may result in the removal of some existing vegetation.</p> <p>However, at the time of subdivision, conditions will be recommended for measures to be undertaken to protect vegetation worthy of retention and potential habitat or foraging trees for threatened fauna species. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.</p> <p>The applicant has prepared an Urban Water Management Plan accompanying the Amendment and details the drainage regime for the development. The drainage is to be designed to reduce the impacts of drainage on the Cardup Brook by providing a number of basins to hold and treat storm water and for it to drain naturally without</p>

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		<p>this type development is just not suitable in the Cardup Brook Precinct. The reason being, this is a residential development not a commercial development, and as such this is not the place for the inclusion of large format showrooms/bulky goods premises, or any other type of commercial development. It should be noted that on the approved "LSP Plan 06/014/131R this area was predominantly allocated as Mixed-Use (Residential R80), and to a lesser extent some Residential R20 lots.</p> <p>I propose the approved "LSP Plan 06/014/131R" should be retained and the proposed amendment that includes a Service Commercial site be rejected.</p> <p>It should also go without saying (but want it noted anyway) that a Service Station is absolutely not appropriate to be constructed anywhere within the Cardup Brook Precinct. This is due to the environmental importance of the Cardup Siding Brook which needs to be protected from any possible contamination or leakage from fuels, oils, chemicals, solvents, etc. Also any development on this site should have very stringent conditions placed on it that all water collected on-site, remains on-site and is not permitted to be discharged into the Brook.</p> <p><u>Conservation of Habitat Trees</u></p> <p>I would like to comment on the number of very large trees that are located within the Cardup Brook Precinct that are at considerable risk of being felled due to this development. Of note, there is a particularly large cluster of old mature trees in the Cardup Brook Precinct between Lawrence Way and Warrington Road. Some of these trees are over 100 years old. These trees are an important habitat and food source for several endangered</p>	<p>and connections to ensure appropriate integration. Increase in anti-social behaviour along the brook as a result of this proposal is not a relevant planning consideration. The enhancement of public realm areas and appropriate built form outcomes will only increase passive surveillance and enhanced safety. The design of the public realm will involve the provision of formal paths reducing the opportunity for crime and anti-social behaviour.</p>	<p>significant drainage flow entering the Brook directly.</p> <p>Officers note the concern with off road vehicles within the Cardup Brook reserve. This matter is managed under the Control of Vehicles (Off-road Areas) Act 1978.</p>

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		<p>bird species, namely the Carnaby's Black Cockatoo and the Red Tail Cockatoo. Also, the trees all along the Cardup Siding Brook and surrounding areas are also regularly frequented by these two species as a source of food. When you walk the dual use path that runs parallel to the Brook you see the evidence of their feeding with the remnants of partially eaten nuts strewn all over the path and the surrounding area.</p> <p>To ensure this valuable habitat and food source is protected for the flora and fauna that inhabits this unique area I propose that the approved "LSP Plan 06/014/131R" be retained and the proposed amendments be rejected.</p> <p><u>Management of Storm Water into the Cardup Siding Brook from the Cardup Brook Precinct</u></p> <p>I have the following major concerns:</p> <ul style="list-style-type: none"> <li>• Volume of storm water being discharged into the Cardup Siding Brook</li> <li>• Environmental Issues arising from the discharge of storm water into the Cardup Siding Brook</li> </ul> <p>Volume of storm water being discharged into the Cardup Siding Brook:</p> <p>In the proposed amendments, the overall lot density has been significantly increased within the entire Cardup Brook Precinct. This significant increase in lot density, will in turn increase the road surface area due to the creation of more roads and additional rear lane ways. The knock on effect of that means the</p>		

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		<p>volume of storm water will increase directly in line with the increase in the road surface area.</p> <p>During periods of sudden high rainfall, the significant increased volume of storm water being discharged into the Brook has the possibility of causing flooding to the low lying areas surrounding the Brook. This will have major ramifications for those residents in the low lying areas along the Brook, as well as to the west of Hopkinson Road.</p> <p>Over the past month the Brook has broken its banks in several places causing flooding into the surrounding low lying areas - the latest was on 17 August 2022. The rain events that have caused this flooding are not classified as severe, but typical for this time of year. Back on 26 July 2021 there was a major flood event that caused severe flooding all throughout Byford. The result on the Cardup Siding Brook was severe flooding. It broke its banks the entire length of the Brook from Soldiers Road to Hopkinson Road, culminating in major flooding over the road at the intersection of Orton and Hopkinson Roads.</p> <p>Environmental Issues arising from the discharge of storm water into the Cardup Siding Brook:</p> <p>Again, due to the proposed overall lot density being significantly increased within the entire Cardup Brook Precinct, and there being a possibility 90% of these lots end up being R40 (with a minimum lot size of 180sqm, with an average of 220sqm) I have major concerns regarding the environmental impact a development of this scale will have on the eco system of a such an important major waterway.</p>		

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		<p>One of these concerns is the run off of detergents into the Brook due to residents having to wash their vehicles in the driveway silane ways of their homes due to a lack of accessible lawn area, as their lots are too small to accommodate any sizeable green space. Also, home handymen whom service and repair their vehicles in their garages/driveways, when cleaning up afterwards may disperse any spills onto the road and into the storm water system. Perhaps the most damaging to the Brooks native eco system is the run off into the storm water system from all the fertilisers and chemical weed control that comes from both private gardens and the upkeep and maintenance of the Public Open Space.</p> <p>I propose that the approved "LSP Plan 06/014/131R" be retained and the proposed amendments be rejected. This is due to the overall lot density being significantly increased in the proposed amendments and the adverse impacts that this will have on both the volume of storm water being discharged into the Cardup Siding Brook, and also the environmental issues arising from the discharge of storm water into the Cardup Siding Brook.</p> <p><u>Access between Cardup Brook Precinct and Byford by the Brook</u></p> <p>There is currently a foot bridge over the Cardup Siding Brook opposite 63 Cardup Siding Road, as well as two concrete traffic-able culverts; one to the rear of 32 MacLeod Close and the other opposite 38 Learmouth Turn. There is also one other cross-over point where the Brook is very narrow and shallow; this is opposite the rear of 236 Cardup Siding Road. These all allow access between Byford by the Brook and the future Cardup Brook Precinct development.</p>		

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		<p>The residents of Byford by the Brook have for many years been putting up with numerous dirt bikes/quad bikes and even unauthorised vehicles crossing over the Brook via these access points to utilise the dual use path that runs along the Brook (from Cardup Siding Road to Learmouth Turn). This is obviously a highly dangerous practice and also an illegal one. These dirt bikes/quad bikes are also able to avoid being caught by the Police by crossing over the Brook using any of the above access points. When the Cardup Brook Precinct is developed, it is my understanding a reciprocal dual path will be established running parallel to the Brook from Soldiers Road (east) to the future Tonkin Highway extension (west). My concern is how the Developer plans to prevent dirt bikes/quad bikes and possibly unauthorised vehicles continuing to utilise these access points to cross over the Brook from the Cardup Brook Precinct. The existing vehicle gates on Cardup Siding Road and Learmouth Turn stop unauthorised vehicles entering onto the path, but bikes/quad bikes seem to be able find gaps in the bollards. Perhaps an audit of the bollards on the Byford by the Brook side should be undertaken to find a solution to prevent dirt bikes/quad bikes from entering onto the dual path here; and also look at the bollard design in the Cardup Brook Precinct.</p> <p>I propose that a vehicle gate be installed just in front of the two concrete traffic-able culverts on the Cardup Brook Precinct side; as well as some type of pedestrian maze (similar to those used in pedestrian crossings over railway lines) be installed on both sides of the foot bridge. This would still allow pedestrian access, but would severely deter bikes/quad bikes, and unauthorised vehicles would not be able to cross over the Brook at all. The</p>		

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		<p>cross-over point where the Brook is very narrow and shallow will also need to be modified in some way to prevent access by bikes/quad bikes, and pedestrian access over this cross-over point should not be encouraged due to possible safety issues.</p> <p><u>Concluding Comments</u></p> <p>I have addressed most of the major issues I have concerning the proposed amendments to the entire design of the Cardup Brook Precinct, but not "the elephant in the room". This is the effect these "small lot developments" have on the mental health of those whom live in them. I could "wax lyrical" on about this issue, but I would like to borrow something that was sent to me that sums up this and all the issue I have with small lot developments that are not appropriate in the setting in which they are proposed.</p> <p><i>"I am on acreage but the amount of estates being build around here that are sub 300sqm is just scary.</i></p> <p><i>They are down to 250sqm now and that's far from uncommon.</i></p> <p><i>Far as I am concerned they are building the slums and dysfunctional homes and communities of the future. I went for a drive with the Mrs a while back through one of these "new suburbs" and they are completely claustrophobic!</i></p> <p><i>I stopped and despaired at small cars like a Corolla parked up hard against the Garage Door in the driveway with the back end of the vehicle still hanging over the foot path. You can't park opposite the neighbour's driveway because if you do they don't have room to reverse out.</i></p>		



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		<p><i>I wonder what these places are going to be like in 20 years time? They are young people buying these 3 and 4 bedroom dog boxes and they are buying them to fill with kids. There is NO backyard for them to play in, no street to play in, no parks to play in and not even any public transport for a good distance because there is no way to put a bus up the majority of these roads.</i></p> <p><i>What happens when all these kids get cars? There is no way they are going to be able to park on their own block, certainly not enough room on the streets so the social problems and discontent are ready made.</i></p> <p><i>Parents pay some clown that costs a fortune to tell them that kids in these places are addicted to video games and are over weight because they don't get enough exercise. What a shock that will be.... to no one with a brain that can see the 10ft writing on the wall.</i></p> <p><i>Should be legal minimum for SOOsqm lots in my book unless it's a home designated for over 60's.</i></p> <p><i>These tiny blocks are simply social problems of the future being created now."</i></p>		
IN22/17521 M. Mottahedian 1367 Orton Road BYFORD	17.	Change of their zone and road plans will effect the future of my property. Due to their last change I have lost 5m of my property to road widening.	The proposed road reserve width for Orton Road of 30.0m is consistent with the Byford Traditional DCP, Byford DSP and responds to traffic volume forecasts.	No additional land will be required from your lot for the upgrade of Orton Road as part of this proposal. If any additional land is required for the upgrading of Orton Road as part of the LSP

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<p>IN22/17554 D &amp; C Gossage 241 Cardup Siding Road BYFORD</p>	<p>18.</p>	<p>As owners of Lot 241 Cardup Siding Rd we object to the amendment #11 to The Glades, Byford Local Structure Plan and the Cardup Brook Precinct proposed by LWP Property Group.</p> <p>In particular we object to the redistribution of residential densities and the introduction of density code ranges R20-R40 which is depicted over the greater majority of the area concerned. From my understanding this density code range has a base of R20 but allows blocks to be developed up to R40 by negotiation of conditions between the developer and the Shire. It is our concern that the pure nature of development LWP will push for R40 blocks over the greater majority of the area with the offset of the Shire seeking compensation to fund other activities not relating to the Cardup Brook Area. (I Note, most amendments to the Local Structure Plan to date have been to increase densities).</p> <p>We are much more in favour of the original plan which had varying size lots ranging from R15 along the Cardup Brook area and transitioning through to smaller higher density blocks towards Orton Rd. It would seem logical to use this strip of land between the Brook and Orton Rd as a transition to the higher density housing already in existence to the north of Orton Road.</p> <p>We also object to the redistribution of the POS and incorporation of the DOS. The original plan has dedicated parklands scattered amongst residential areas which would allow play and activity spaces within close proximity to residences. The amendment</p>	<p>Residential density – refer to comments at (14), (15) &amp; (17).</p> <p>Redistribution of POS – refer to comments at (17) above.</p>	<p>amendment, it will be taken from Lot 9001 Orton Road.</p> <p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup</p>

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		<p>appears to have 1 dedicated area as DOS with other park land being incorporated as drainage or non-usable play spaces close to the Cardup Brook.</p> <p>We were drawn to the area due to its natural environment which we would like to preserve. The original local area plan assisted with our decision making on which block of land to buy at the time and we were attracted in particular by the buffering of lot sizes and the public open space that was planned on the north side of the Brook. We would like this original plan honoured.</p>		<p>Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.</p> <p>The District Open Space (DOS) is intended to cater for a large number of activities for the surrounding community and will be designed to incorporate a number of essential amenities to create a highly functional area of public open space.</p>

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				This however is all subject to future detailed design at the time that the DOS is created. The purpose of the Structure Plan amendment is to identify the location of the DOS and ensure that it is located appropriately to be accessible to the surrounding community.
IN22/17415 J. Bain & A Venter L66 (165) Kokoda Boulevard, Byford	19.	<p>For the dos (Orton Road district open space facility), we would love to see a large adventure playground on a similar scale and of similar design to the Kwinana Adventure Park at Walgreen Cres, Calista, WA 6167 and the Bibra Lake regional playground on Progress Drive, Bibra Lake WA 6163.</p> <p>We feel this is something that the area is lacking, and it will be a good attraction for local tourists.</p> <p>We would also like to see a multipurpose building that can be used as a function centre among other things.</p> <p>We feel this will add to the area, as something different to the Serpentine Jarrahdale Community Recreation Centre.</p> <p>Another facility we would like to see is a public use swimming pool facility, as this is something the Shire of Serpentine Jarrahdale currently lacks.</p>	The detailed design of the DOS facility and neighbouring POS area will be undertaken at the subsequent stage of the planning and design process. Community infrastructure associated with the DOS facility will be in accordance with the Shire's Community Infrastructure DCP. Additional infrastructure such as a swimming pool is to be determined by the Shire in response to community need and demand and not the responsibility of LWP to provide.	<p>The District Open Space (DOS) is intended to cater for a large number of activities for the surrounding community and will be designed to incorporate a number of essential amenities to create a highly functional area of public open space.</p> <p>This however is all subject to future detailed design at the time that the DOS is created. The purpose of the Structure Plan amendment is to identify the location of the DOS and ensure that it is located appropriately to be accessible</p>

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				<p>to the surrounding community.</p> <p>The infrastructure that will be developed will align with the Byford DCP. Additional infrastructure such as a pool will require further investigation into the need and feasibility for the Shire.</p>
<p>IN22/19115 Pete Olds 3 Bradley Close, Byford</p>	<p>20.</p>	<p>For a region that was once rich in native bushland and biodiversity that has been cleared and water ways and water shed disturbed and destroyed, the plan should include more generous native spaces, better use of rain gardens, swales and improved water ingress with native landscapes along parks and roadways and to ensure more connected and interlinked public open spaces via vegetated reserves, access ways to allow healthy traffic free pedestrian and commuting carriage ways, and ensure there are safe linkages and connected biodiversity corridors for native animals such as bandicoots, small birds, reptiles (frogs and lizards etc). Also the requirement for a minimum of 50% native plants in the development is embarrassing, as it allows the use of London plane trees and other inappropriate species for the area, and opens the area up to eastern states weed/pest species for native bushland as is already prolific and a blight on the WA landscape along with pest South African and other exotic species in our rural and remnant bushland species through garden escapees. There should be a minimum requirement of 75-80% of local WA native species of</p>	<p>The Glades Estate has long been identified for urban development with an existing LSP in place since 2010. Development has been progressing and nearing completion north of Orton Road and is now transitioning to the Cardup Brook precinct. Consistent with the design rationale and principles of the approved LSP, the LSP amendment proposes a variety of residential and non-residential development of varying densities, optimises exposure to the brook and provides a centralised area of active open space and supporting local open space areas. The subdivision design will ensure the retention of key areas of vegetation on site</p>	<p>The Cardup Brook has a 30m Resource Enhancement Wetland buffer applied to ensure the protection of the ecosystem and the flora and fauna that build, support and preserve the ecosystem.</p> <p>No development is intended to occur within the 30m Resource Enhancement Wetland (REW) buffer area.</p> <p>At the time of subdivision, conditions will be recommended for measures to be undertaken to protect vegetation worthy of retention and potential habitat or</p>

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		<p>particular using species native, endemic and indigenous to the area. The heritage, culture and significance of our local landscape, ecology/biodiversity needs to be better protected...Selection of street trees and the like should be better directed and controlled so that local area/application suitable native species are used rather than introduced/localized and often inappropriate choices are made.</p>	<p>where appropriate and retention of the Cardup Brook foreshore buffer. Drainage and landscaping proposals will be based on better urban water management principles and species selection to be determined at the detailed design stage and in accordance with the Shire's requirements.</p>	<p>foraging trees for threatened fauna species.</p> <p>In addition, conditions for the revegetation of native vegetation within road reserves and areas of POS (including the foreshore reserve) will be required. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.</p>
<p>IN22/19115            Wilhelmina Turton            42 Coulterhand Circle, Byford</p>	<p>21.</p>	<p>Allowing the plan to change AFTER submission is telling all tax payers that anything goes as long as you have enough money. It is unethical to change the plans after families already bought into the first design. It seems this is an ongoing issue with the shire. Austral Bricks that was allowed to increase production but when the properties on the Scarp was sold it was with the understanding that the company will close. Open spaces are vital for mental health and wellbeing. If the shire is serious about being vested not only in development but also the promotion of being active and part of a community, it is important to keep open spaces for families to meet in nature. People Bought there for nature, and with less open spaces that factor will Be lost. Which means slowly the shore allows Byford to turn in to a run off the mill suburb- instead of preserving the very quality - native</p>	<p>Open space – refer to comments at (17) above.</p>	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to</p>

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		bushland and a country feeling- that has made our shire stand out from the rest.		<p>provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to</p>

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				<p>interface with development south of the Brook.</p> <p>The District Open Space (DOS) is intended to cater for a large number of activities for the surrounding community and will be designed to incorporate a number of essential amenities to create a highly functional area of public open space.</p>
<p>IN22/19115  Peter Dockett  189 Hay Street,  Subiaco</p>	<p>22.</p>	<p><a href="https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/a8845fa1cc5d89aa315acba16d3b78dc875d2af6/original/1661136618/f5865b27d9f179ed0fa38c2a8337f38f_220818_-_Letter_-_SoSJ_-_LSP_Amendment_11_%2528Cardup_Brook%2529_-_Richard_Noble_submission.pdf?1661136618">https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/a8845fa1cc5d89aa315acba16d3b78dc875d2af6/original/1661136618/f5865b27d9f179ed0fa38c2a8337f38f_220818_-_Letter_-_SoSJ_-_LSP_Amendment_11_%2528Cardup_Brook%2529_-_Richard_Noble_submission.pdf?1661136618</a></p>	<p>Refer to submission at (13) above.</p>	<p>Noted.</p> <p>Doley Road is planned to be extended south from The Glades Estate located to the north, crossing over the Cardup Brook to connect to the Lot 33 Hopkinson Road LSP area. This will provide an important transport connection for the Structure Plan area and the Byford Town Centre.</p> <p>Main Roads have advised that the Doley Road south link was agreed to be provided for bushfire emergency egress to</p>



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				<p>the east and to provide access to the proposed development south of Cardup Siding Road. Main Roads has advised that it will construct the Doley Road south connection to a desirable minimum road cross section consistent with the developer's ultimate proposal. Widening including the installation of utility services requirements will be the responsibility of the developer.</p>
<p>IN22/19115 Bruce &amp; Donna Scarterfield 30 Macleod Close, Byford</p>	<p>23.</p>	<p>As per section 9.3.3 Density control of the WAPC Residential Design Codes Explanatory Guidelines 2021 "For existing urban areas the process of allocating an R-Code in a scheme requires careful assessment of the relationship between the lot sizes prevailing in a locality" And also 9.3.4 Changes in housing density "Development sites should respect adjoining properties where land use or zoning differs, particularly where two residential lots with different R-Codings adjoin" The current approved LSP, its previous revisions, and past plans and documents contain several groupings of lower density lots along the boundary to neighbouring Byford By The Brook. These would serve as a buffer and transition between the higher density The Glades development to the north and Byford By The Brook zoned R2.5 and wider Cardup rural residential area to south. The</p>	<p>Refer to comments at (17) above.</p> <p><b>Bushfire Management Plan</b></p> <ul style="list-style-type: none"> <li>• The Landscape Masterplan and BMP were prepared in collaboration and are therefore based on the same assumptions. The BMP was very conscious of needing to ensure the proposed treatments for Cardup Brook and the buffer were accommodated in the assessment of bushfire hazards. The wetland</li> </ul>	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density</p>

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		<p>proposed amendment will not provide that transition buffer. The proposed amendment in fact suggests similar reasoning for changing R code of Icaria Stages 13 and 14 from R80 down to R25 due to its proximity to other areas coded</p> <p>R25. The LWP material provided for the Byford By The Brook development, and the restrictive covenants placed on lots within, depicted a semi-rural lifestyle development. For example the boundary fencing stipulated and as installed by LWP is 'open rural fencing', is inconsistent and incompatible with the proposed medium/high density coding adjacent. The low and open rural fencing installed was appropriate for 'semi-rural' setting with low density and sparse local foot traffic, but is not suited to medium density more 'urban' setting. With regard to the WAPC Designing Out Crime Planning Guidelines 2006 there are areas of concern where there is a mismatch between existing development and the proposed LSP.</p> <ul style="list-style-type: none"> <li>• 5.5 Building design, including boundary definition – fencing provided and stipulated for By The Brook inadequate for high density development adjacent to it, provides opportunity for entering rear of properties whilst shielded from view of larger development and street - (will this act against us? Create desire to remove vegetation to improve passive surveillance?)</li> <li>• 5.6 Lighting – Current Byford by the Brook multiuse path has no lighting of the associated public space No outline for density ratios or guidelines for implementation of proposed change to R20-40 and R40-60 'dual coding' density The proposed amendment to change the density R codes over the majority of the Cardup Brook Precinct to dual coding R20-40</li> </ul>	<p>and buffer are assumed to be long-term bushfire hazards.</p> <ul style="list-style-type: none"> <li>• The 'Resource Enhancement Wetland Buffer POS' incorporates the buffer as well as Cardup Brook (the resource enhancement wetland). Therefore the descriptions of treatments may apply to either the buffer or the Brook itself. No existing native vegetation associated with the mapped resource enhancement wetland is proposed to be removed.</li> <li>• Where the reference to '<i>non-irrigated revegetation planting to degraded areas</i>' is noted, this is in relation to proposed revegetation planting within Cardup Brook (the mapped resource enhancement wetland), not the buffer area. Cardup Brook is assumed to be forest vegetation from a bushfire perspective (the highest classification from a bushfire hazard perspective), and therefore additional planting in degraded areas is accommodated in the vegetation classification.</li> </ul>	<p>code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. it is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in</p>

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		<p>(or R40- 60) doesn't outline any ratio of what the final density codes will be. Nor does it specify what requirements, approval and consultation process, if any, need to be met in order to use the higher R40 or R60 density codes in place of the default R20 and R40 in the dual coding.</p> <p>The final built form and function of a development consisting a higher ration of R20 and R40 density will be vastly different to one consisting mainly of R40 and R60 lots. The completed urban water management plan would also likely differ significantly across those two scenarios. Conflicting statements regarding revegetation of Resource Enhancement Wetland and associated buffer Appendix B The Glades – Cardup Brook Landscape Concept Plan (Plan E 2022) and Attachment E Public Open Space Landscape Strategy Plan - allude to the "RESOURCE ENHANCEMENT WETLAND BUFFER POS" having "Non-irrigated revegetation planting to degraded areas". However, in multiple other instances throughout the proposal relating to the Bushfire Management Plan it states that "This buffer area is not intended to be revegetated with non-irrigated revegetation planting to degraded areas." Consolidation and relocation of POS will result in likely clearing of mature native trees that are food source for protected fauna and other displaced wildlife Changes to the POS /DOS design from current approved LSP will likely result in clearing more than a dozen mature native trees that are a food source for vulnerable and endangered species, including species of Black Cockatoo that have been observed on numerous occasions feeding in this area. Many of these trees range from approx 150 to over 300 years in age and are</p>	<ul style="list-style-type: none"> <li>Additional tree planting can be incorporated into the buffer area without affecting the grassland classification. In accordance with AS 3959, the grassland classification can include an overstorey foliage cover (e.g. from trees/shrubs) of less than 10% (which it should be noted is different to canopy cover – and 10% foliage cover would be equivalent to 20-30% canopy cover (sometimes more depending upon the plant species)).</li> </ul>	<p>order to provide for an appropriate density to interface with development south of the Brook.</p> <p>Development is subject to further detailed design at subdivision stage where principles of crime prevention through environmental design (CPTED), which are encouraged for all development. Passive surveillance, lighting and sightlines are all considerations taken at the detailed subdivision stage to address safety concerns.</p> <p>The LSP Amendment has introduced residential density ranges consistent with WAPC's Structure Plan Guidelines. Specific residential densities will be assigned at the further detailed design phase and approved by the WAPC. Shire Officers have recommended further locational criteria to ensure the appropriate</p>

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		<p>irreplaceable within the next few generations. Below is satellite overlay images "LWP approved POS plan" and "LWP proposed POS plan". The proposed DOS area contains no mature trees of this nature. Refer Briefing note - Estimating tree age in jarrah and marri Kim Whitford Science Division Department of Environment and Conservation for method of age approximation The Glades, Byford Revised Local Structure Plan January 2019 - Statements made under section 4.9.2 PREVIOUS ON-SITE BLACK COCKATOO INVESTIGATIONS that feeding was not observed on nearby sites and so there</p> <p>was no evidence of Black Cockatoo's feeding in the area. Those statements are misleading and incorrect in relation to the area surrounding Lot 9000 and the Cardup Brook reserve (refer video footage published on Youtube, links provided below). Videos of Black Cockatoos and remnant native trees <a href="https://youtu.be/W9Wm6SXJW1g">https://youtu.be/W9Wm6SXJW1g</a></p> <p><a href="https://youtube.com/shorts/XTQceARcWI4">https://youtube.com/shorts/XTQceARcWI4</a>  <a href="https://youtube.com/shorts/wwVpxizUoSQ">https://youtube.com/shorts/wwVpxizUoSQ</a> Also, in Section 6.4.7.4 KEY LANDSCAPE FEATURES - PARKLAND CORRIDOR TREE RETENTION - POS area 34 shown on Figure 13 was to be established to retain "significant stands of remnant vegetation". However, within the amendment proposal (eg page 5 of the</p> <p>Bushfire Management Plan BMP) it's incorrectly claimed that "no remnant native vegetation exists elsewhere" besides within Cardup Brook. The BMP also describes these as "remnant isolated paddock trees"</p>		<p>distribution and allocation of density codes.</p> <p>The conflicting statements regarding the revegetation of the Resource Enhancement Wetland and 30m buffer has been requested to be amended as a modification to the Bushfire Management Plan and the Landscape Management Plan to provide clarity and ensure that the wetland buffer is revegetation appropriately with native plant/tree species.</p> <p>Much of the vegetation within the LSP amendment area is proposed to be retained within the Cardup Brook Foreshore buffer (30meters). The redistribution of the POS and the inclusion of the DOS may result in the removal of some existing vegetation.</p> <p>However, at the time of subdivision, conditions will be recommended for measures to be undertaken to protect</p>

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				vegetation worthy of retention and potential habitat or foraging trees for threatened fauna species. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.
<p>IN22/19115  Pamela Lanigan  14 Macleod Close, Byford</p>	24.	<p>We would like to express our extreme disappointment that there is a proposal to change the Cardup Brook precinct local structure plan.</p> <p><b>Our Original Land Purchase</b></p> <p>We purchased our property off the same developer when it was released. Part of the purchasing decision we made was based on the presentation of the plans for the surrounding area by that same developer. The Cardup Brook precinct was medium density with open spaces acting as a buffer between our large lifestyle blocks and a lower density development. It was offered as a feature of the sale.</p> <p>We always knew the paddocks behind our block would be developed but felt the density and space allocations were suitable. To our knowledge this has already been changed once by council to allow a higher density. We were VERY unhappy about that change but accepted it as an adjustment to the area.</p> <p>To now find out that the developer wants another density change and to reduce the open space land is insulting. It feels like they told us a story to get our money at the start of the development</p>	<p><b>Our Original Land Purchase</b></p> <p>This is not a relevant planning consideration. Further, the proposal is consistent with the comments stating that the Cardup Brook precinct was originally envisaged as “medium density with open spaces”. The original LSP was approved in 2011 and it is only reasonable and expected that a comprehensive design review is required to respond to current market trends and given the clear transition to the remaining undeveloped precinct south of Orton Road.</p> <p>Refer additional comments at (14), (15) &amp; (17) with respect to residential density and open space.</p> <p><b>Cardup Brook Wildlife</b></p>	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to</p>

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		<p>and now years later they are breaking their promises to fit in as many more block sales as they at the tail end of the area's development.</p> <p>The proposal states that it is “considered necessary to undertake the review as the current design is several years old and market trends have changed with lot product type and mix requiring review.”. To us that sounds like we rolled the dice as far as what the land would be worth commercially when we acquired it but it didn't go our way so now, we want to change it.</p> <p>Yes, over time land use can and will change but as a purchaser in an area we should be able to expect that what was planned for the area around us should not change substantially for a significant period of time. Urban renewal doesn't happen within less than twenty years. The current density and open space allocation should stand.</p> <p><b>Cardup Brook Wildlife</b></p> <p>In the years we have lived backing on to Cardup Brook we have seen a lot of change in the wildlife in the area. Our blocks were originally cow paddocks but now there are a lot more trees and habitat. We have participated in the council's verge program several times to create habitat for local bandicoots.</p> <p>The number we see has changed over time especially as we don't have dogs. They have been breeding in the habitat at the front and back of our block. They are very susceptible to attacks from roaming pets and also to be run over by cars. Higher density housing means more pets and more cars. The numbers will take a hit.</p>	<p>There is negligible impact on yield between the existing and proposed LSPs, and a small reduction in yield across the Cardup Brook precinct. Further, key areas of vegetation on site with the potential for supporting native fauna habitat will be retained under the modified LSP and the Cardup Brook Foreshore buffer is retained.</p> <p><b>Pushing People To The Brook As A Recreation Space</b></p> <p>The Cardup Brook Foreshore buffer is retained under the proposed amendment. As discussed above, the landscape proposal along the brook will provide for formal paths and connections that aim to protect the existing qualities of the brook and also reducing the opportunity for crime and anti-social behaviour.</p> <p><b>Purpose Of The Changes</b></p> <p>This is not a relevant planning consideration. Refer comments above in response to 'Our Original Land Purchase'.</p>	<p>reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.</p> <p>Development is subject to further detailed design at subdivision stage where principles of crime prevention</p>

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		<p>In the last year we have also seen native possums in the habitat at the back of our block along the brook. They have made their way from the Cardup Nature Reserve. It is great to see that they are expanding their zones especially as the Cardup reserve is going to have a new development next to it putting pressure on that habitat.</p> <p>The proposal states as its very first fundamental design principles is to “Optimise exposure to the Brook (the precinct’s most prominent natural asset)”. If the development stayed at its original density levels this would be fine but the plan to have more people and less space means it won’t be optimised, it will be overrun. The council should not allow this to happen.</p> <p><b>Pushing People To The Brook As A Recreation Space</b></p> <p>The walkway along the brook is a lovely area for people to enjoy and we do like seeing people use it. We see walkers, bike riders and even horses. We know it will get busier when the development goes ahead. What we don’t want to see though is that this area and the buffer zone for the brook become the replacement for the loss of open space in the development. That was not what it was originally planned to be.</p> <p>We have a requirement to have a post and wire fence only on our boundary. If the changes go ahead and there are lots of people using the path our privacy and security will be greatly and unfairly diminished.</p> <p>The area is currently very quiet. We knew when the Cardup Brook precinct was developed this would change but not to the extent it will change if the density goes up and open spaces go</p>		<p>through environmental design (CPTED), which are encouraged for all development. Passive surveillance, lighting and sightlines are all considerations taken at the detailed subdivision stage to address safety concerns.</p> <p>The LSP Amendment has introduced residential density ranges consistent with WAPC’s Structure Plan Guidelines. Specific residential densities will be assigned at the further detailed design phase and approved by the WAPC. Shire Officers have recommended further locational criteria to ensure the appropriate distribution and allocation of density codes.</p> <p>Much of the vegetation within the LSP amendment area is proposed to be retained within the Cardup Brook Foreshore buffer (30meters). The redistribution of the POS and</p>

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		<p>down. The security issue is a big deal for us as and was the reason we moved from suburbia to the area.</p> <p>Byford has always been good about the balance of open space to smaller density housing. The idea that the homes in the development have less personal space and less public space seems to go against what has been an important part of development decisions by the council for many years.</p> <p>There is a great mix of land types in the area and there is a good amount of merging between different densities. The new, large blocks along Abernathy Rd are a really good example of moving from higher density behind them to the lower density across the road from them.</p> <p><b>Purpose Of The Changes</b></p> <p>Our last argument against the change is that we can see no good reason for the change. The developers are not making this proposal to enhance the area or protect the brook wetlands despite what the proposal might say. This is 100% a change based on their commercial needs. The changes suit them and their bottom line or they would not be proposing them.</p> <p>They acquired the land based on the original density and open space requirements. At that time they based this on what profit they felt they could make on the land. If they had of developed it in a timely fashion back then we would not be having this discussion. Instead, they sat on it and now want to change things to suit their commercial needs.</p> <p>They want to change the things that we and our neighbours have relied on (due to the representations made by them at the time</p>		<p>the inclusion of the DOS may result in the removal of some existing vegetation. However, at the time of subdivision, conditions will be recommended for measures to be undertaken to protect vegetation worthy of retention and potential habitat or foraging trees for threatened fauna species. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.</p> <p>In relation to the Brook being protected, no development will occur within the Resource Enhancement Wetland buffer. This buffer area will allow for revegetation and ensure the integrity of the Brook is maintained and its essential ecosystem services are able to function. Areas of POS and drainage will mostly be located outside of the buffer area to minimise impact on the Brook. In addition, the</p>



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		<p>of purchase) as being the plan for the area since we purchased here. We all had to comply with caveats on our blocks so as to keep the area how they wanted it to appeal to future purchasers but we are not being afforded that same respect. They are not keeping to what they told us was planned for the land behind us when we purchased.</p> <p>We are not anti-business. We understand they need to make money from their efforts. It just feels like they took a chance on the development and it hasn't worked out to be what they wanted commercially. They are trying to rectify it by changing the game plan and that is not fair to the people who have to live alongside the changes.</p>		<p>inclusion of the District Open Space will provide a large central area for residents to recreate.</p>
<p>IN22/19115 Jayne Farr 12 Macleod Close, Byford</p>	<p>25.</p>	<p>I object to the proposed changes to the Cardup Brook Precinct. My reasons for objection are: I purchased my property based on The Cardup Brook precinct was medium density with open spaces and that future development would include large public open space. I also feel very strongly that if the changes go ahead and there are lots of people using the path my privacy and security will greatly and unfairly diminished as I am required to have a post and wire fence. I also feel that having higher density housing close to the Brook will be an environmental disaster with more fertiliser and rubbish making it way to it.</p>	<p>The vast majority of the LSP Amendment area is medium density development (R20-R40) and is generally consistent with the residential densities envisaged under the approved LSP. As discussed above, it has been a requirement of the Shire to accommodate a DOS facility resulting in the consolidation of areas of local open space to a centralised active recreation facility. Notwithstanding, the landscape concept plan proposes a variety of open spaces of varying functions, in addition to enhancement of the</p>	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria</p>

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			<p>brook and environs to enhance amenity and recreational opportunities for residents and visitors.</p>	<p>to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.</p>

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IN22/19115 Travis Vandermeer 22 Learmouth Turn, Byford	26.	<p>I object to the proposed plan for the following reasons: The lots are too small. High density housing is not a good fit for the area as the Byford on the Brook estate is opposite the Cardup Siding Brook. It would make far more sense and fit the theme better if the lots on the opposite side of the brook were similar in size and style. Thus the Brook would simply be a wonderful, fitting natural feature that runs down the middle of an extended Byford by the Brook estate. Smaller lots and high density housing will attract a different and somewhat less desirable demographic in many cases. Due to the conditions imposed on the lots in Byford on the Brook, all the properties there have rural fencing with does not provide the same kind of privacy and security that more suburban lots have. As the surrounding lands currently stand, this is a very suitable feature due to the open spaces. There is very little traffic in the area which allows privacy and security. With high density housing on the other side of the brook, it can be reasonably assumed that much more traffic, both pedestrian and vehicular, is likely to find its way onto the estate. This includes undesirable characters who look to commit unsavoury activities in the area. Rural housing and fencing is not compatible with high density housing and the demographic it attracts. Crime and burglaries can be expected to rise and this is not fair on the residents who currently reside in the Byford by the Brook estate off Cardup Siding Road. It is clear that the decision to put high density housing on the land off of Orton Road is driven by greed as opposed to creating a pleasant community for the residents both new and old. The developer's motivation is greed as they will make more money by selling more lots. The Shire is motivated by the extra revenue it will generate in the extra</p>	Residential density – refer to comments at (14), (15) & (17).	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to</p>

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		<p>ratepayers that come with smaller lot sizes. The Shire is supposed to be there to act on behalf of the residents. It is clearly not doing that and instead has chosen to put its own financial interests and that of the developer before its constituents. The Developer does not have to deal with the consequences of their greed. They come in, destroy the natural environment, make a quick profit then they leave, never to be heard from again, leaving all the problems they create for the residents in the area to deal with. The shire needs to put its residents first. Plain and simple. Nobody wants this estate on Orton Road. We know it is going ahead though, regardless of what the residents want. The least the Shire can do is to heed our wishes and meet us in the middle. The very minimum size of these lots would be half an acre, with some going as large as 2 acres so that it fits the theme of the adjacent estate, Byford by the Brook. Rural fencing included. I actually see the potential for an amazing estate to be created if it is basically a mirror image of what is on the other side of the Brook. I suggest that the shire scrap the Developer's proposed plan and send them back the conditions as I have suggested here. They will then need to come up with a brand new proposal which fits in with the already established estate on the south side of Cardup Siding Brook. I have spoken to many neighbours about the current proposal as it stands and nobody is happy about it. Many are already talking about selling and moving when construction starts. That is how big a concern it is for everyone to have the kind of housing that has been proposed right on our doorsteps. People moved into this estate to be away from that kind of housing and live in a more open, rural style</p>		<p>increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.</p> <p>Shire Officers understand that the increased number of people using the Cardup Brook area as a place of recreation may lead to the perception of decreased safety of the area, however increasing activity within the Brook area, as a place for recreation will increase the passive surveillance.</p>

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		setting. It is imperative that the shire respect the residents and heed to our wishes.		Development will be subject to further detailed design at subdivision stage where principles of crime prevention through environmental design (CPTED) are to be incorporated at the detailed planning stage. In addition, landscape plans will be required to incorporate features to increase safety, such as lighting, reducing entrapment areas, increasing passive surveillance and controlling access points.
IN22/19115 Maxwell and Marvella Stan- Bishop 32 Macleod Close, Byford	27.	<p>Below are our objections to the proposed amendment to The Glades Local Structure Plan (LSP).</p> <p><b><u>Proposed change in R coding, and resulting increase in dwelling density, is inconsistent with both the approved The Glades LSP and the existing adjacent Byford By The Brook development.</u></b></p> <p>As per section 9.3.3 <b>Density control</b> of the WAPC <i>Residential Design Codes Explanatory Guidelines 2021</i></p> <p>“For existing urban areas the process of allocating an R-Code in a scheme requires careful assessment of the relationship between the lot sizes prevailing in a locality”</p>	Refer to comments at (17) above	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density</p>

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		<p>And also 9.3.4 <b>Changes in housing density</b></p> <p>“Development sites should respect adjoining properties where land use or zoning differs, particularly where two residential lots with different R-Codings adjoin”</p> <p>The current approved LSP, its previous revisions, and past plans and documents contain several groupings of lower density lots along the boundary to neighbouring Byford By The Brook. These would serve as a buffer and transition between the higher density The Glades development to the north and Byford By The Brook zoned R2.5 and wider Cardup rural residential area to south. The proposed amendment will not provide that transition buffer.</p> <p>The proposed amendment in fact suggests similar reasoning for changing R code of Icaria Stages 13 and 14 from R80 down to R25 due to its proximity to other areas coded R25.</p> <p>The LWP material provided for the Byford By The Brook development, and the restrictive covenants placed on lots within, depicted a semi-rural lifestyle development. For example the boundary fencing stipulated and as installed by LWP is 'open rural fencing', is inconsistent and incompatible with the proposed medium/high density coding adjacent. The low and open rural fencing installed was appropriate for 'semi-rural' setting with low density and sparse local foot traffic, but is not suited to medium density more 'urban' setting.</p>		<p>code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an</p>

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		<p>With regard to the WAPC <i>Designing Out Crime Planning Guidelines 2006</i> there are areas of concern where there is a mismatch between existing development and the proposed LSP.</p> <ul style="list-style-type: none"> <li>• 5.5 Building design, including boundary definition – fencing provided and stipulated for By The Brook inadequate for high density development adjacent to it, provides opportunity for entering rear of properties whilst shielded from view of larger development and street - (will this act against us? Create desire to remove vegetation to improve passive surveillance?)</li> <li>• 5.6 Lighting – Current Byford by the Brook multiuse path has no lighting of the associated public space</li> </ul> <p><b><u>No outline for density ratios or guidelines for implementation of proposed change to R20-40 and R40-60 'dual coding' density</u></b></p> <p>The proposed amendment to change the density R codes over the majority of the Cardup Brook Precinct to dual coding R20-40 (or R40-60) doesn't outline any ratio of what the final density codes will be. Nor does it specify what requirements, approval and consultation process, if any, need to be met in order to use the higher R40 or R60 density codes in place of the default R20 and R40 in the dual coding.</p> <p>The final built form and function of a development consisting a higher ration of R20 and R40 density will be vastly different to one consisting mainly of R40 and R60 lots. The completed urban</p>		<p>appropriate density to interface with development south of the Brook.</p> <p>Development is subject to further detailed design at subdivision stage where principles of crime prevention through environmental design (CPTED), which are encouraged for all development. Passive surveillance, lighting and sightlines are all considerations taken at the detailed subdivision stage to address safety concerns.</p> <p>The LSP Amendment has introduced residential density ranges consistent with WAPC's Structure Plan Guidelines. Specific residential densities will be assigned at the further detailed design phase and approved by the WAPC. Shire Officers have recommended further locational criteria to ensure the appropriate</p>

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		<p>water management plan would also likely differ significantly across those two scenarios.</p> <p><b><u>Conflicting statements regarding revegetation of Resource Enhancement Wetland and associated buffer</u></b></p> <p>Appendix B <i>The Glades – Cardup Brook Landscape Concept Plan</i> (Plan E 2022) and <i>Attachment E Public Open Space Landscape Strategy Plan</i> - allude to the "RESOURCE ENHANCEMENT WETLAND BUFFER POS" having "Non-irrigated revegetation planting to degraded areas". However, in multiple other instances throughout the proposal relating to the Bushfire Management Plan it states that "This buffer area is <b>not</b> intended to be revegetated with non-irrigated revegetation planting to degraded areas."</p> <p><b><u>Consolidation and relocation of POS will result in likely clearing of mature native trees that are food source for protected fauna and other displaced wildlife</u></b></p> <p>Changes to the POS /DOS design from current approved LSP will likely result in clearing more than a dozen mature native trees that are a food source for vulnerable and endangered species, including species of Black Cockatoo that <b>have been observed on numerous occasions feeding in this area</b>. Many of these trees range from approx 150 to over 300 years in age and are significant trees and should be registered as such, and they're irreplaceable within the next few generations. Below is satellite overlay images "LWP approved POS plan" and "LWP proposed</p>		<p>distribution and allocation of density codes.</p> <p>The conflicting statements regarding the revegetation of the Resource Enhancement Wetland and 30m buffer has been requested to be amended as a modification to the Bushfire Management Plan and the Landscape Management Plan to provide clarity and ensure that the wetland buffer is revegetation appropriately with native plant/tree species.</p> <p>Much of the vegetation within the LSP amendment area is proposed to be retained within the Cardup Brook Foreshore buffer (30meters). The redistribution of the POS and the inclusion of the DOS may result in the removal of some existing vegetation.</p> <p>However, at the time of subdivision, conditions will be recommended for measures to be undertaken to protect</p>



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		<p>POS plan". The proposed DOS area contains no mature trees of this nature.</p> <p>Refer <i>Briefing note - Estimating tree age in jarrah and marri</i> Kim Whitford Science Division Department of Environment and Conservation for method of age approximation</p> <p><b><u>The Glades, Byford Revised Local Structure Plan January 2019</u></b> - Statements made under section 4.9.2 <i>PREVIOUS ON-SITE BLACK COCKATOO INVESTIGATIONS</i> that feeding was not observed on nearby sites and so there was no evidence of Black Cockatoo's feeding in the area. Those statements are misleading and incorrect in relation to the area surrounding Lot 9000 and the Cardup Brook reserve (refer video footage published on Youtube, links provided below).</p> <p>Videos of Black Cockatoos and remnant native trees</p> <p><a href="https://youtu.be/W9Wm6SXJW1g">https://youtu.be/W9Wm6SXJW1g</a></p> <p><a href="https://youtube.com/shorts/XTQceARcWI4">https://youtube.com/shorts/XTQceARcWI4</a></p> <p><a href="https://youtube.com/shorts/wwVpxizUoSQ">https://youtube.com/shorts/wwVpxizUoSQ</a></p> <p>Also, in Section 6.4.7.4 <i>KEY LANDSCAPE FEATURES - PARKLAND CORRIDOR TREE RETENTION</i> - POS area 34 shown on Figure 13 was to be established to retain "significant stands of remnant vegetation".</p> <p>However, within the amendment proposal (eg page 5 of the <i>Bushfire Management Plan BMP</i>) it's incorrectly claimed that "no remnant native vegetation exists elsewhere" besides within</p>		<p>vegetation worthy of retention and potential habitat or foraging trees for threatened fauna species. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.</p>

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<p>IN22/19115 Justyna Vandermeer 22 Learmouth Turn, Byford</p>	<p>28.</p>	<p>Cardup Brook. The BMP also describes these as “remnant isolated paddock trees”</p> <p>I am deeply concerned about the proposed residential densities as shown in the Local Structure Plan Amendment No. 11 - Cardup Brook Precinct - PA22/502. As evidence as shown, over the past few years, with such high density in other areas of the Glades, crime has risen, rubbish has vastly accumulated and the environment has suffered as a result. We made the decision to move to Byford almost ten years ago and loved living in a beautiful little semi rural spot. Bit by bit, year by year, Byford is becoming less rural and more suburban. Understandably, developers are keen to make a profit by selling more blocks of land, but not surprisingly, don't care one ounce about the heart and soul of what they're tapping into. The Cardup Brook Precinct would best benefit from having large blocks, similar to what's on the other side of the brook to maintain that last bit of semi-rural charm that Byford has to offer. We are seeing similar large lots selling in Oakford and Cardup – this would work well in the Cardup Brook Precinct too. I worry about the devaluation of the properties of the other side of the brook. I encourage the Shire to try to make the land sizes as large as possible. Thank you.</p>	<p>These matters are not relevant to the planning process and should be dismissed in relation to the consideration of this LSP amendment.</p>	<p>The Shire understands that the density code ranges have changed from what was originally proposed in the Glades Local Structure Plan (LSP).</p> <p>The proposed densities for the amendment area have not significantly increased from the approved Local Structure Plan. There has been a re-distribution of densities and the introduction of density code ranges. Modifications have been recommended to provide for locational criteria to govern the distribution of densities, specifically of residential densities abutting the Cardup Brook foreshore to reduce the intensification of dwellings and associated impacts on the Brook.</p> <p>The Shire recognises the need for lot sizes to interface appropriately with the Cardup</p>

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				<p>Brook, provide diversity in lot sizes and respond to increased density targets set out in the South Metropolitan Peel Sub-Regional Planning Framework. It is important for development north of the Brook to sensitively and appropriately interface with the Brook and the larger lots south of the Brook. Shire Officers have proposed the modification to reduce the density code of lots abutting the Brook foreshore to R15 in order to provide for an appropriate density to interface with development south of the Brook.</p>
<p>IN22/19115 Charelle Ranieri 8 Learmouth Turn, Byford</p>	<p>29.</p>	<p>Proposed changes aren't conducive to the surrounding neighbourhoods. Concern for endangered black cockatoo habitat in POS.</p>	<p>There are no areas of potential black cockatoo habitat assessment within the LSP area. Further, key areas of vegetation on site will be retained under the modified LSP and the Cardup Brook Foreshore buffer is retained.</p>	<p>Much of the vegetation within the LSP amendment area is proposed to be retained within the Cardup Brook Foreshore buffer (30meters).  At the time of subdivision, conditions will be recommended for measures to be undertaken to protect</p>

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				vegetation worthy of retention and potential habitat or foraging trees for threatened fauna species. Furthermore, at the time of subdivision, a fauna management and relocation plan will be required to be prepared.