

Modification #	Reference – Proposed provision(s)	WAPC Modification – Modified provisions	Reason
1. Traffic Assessment	Traffic Provisions	The City recommends further clarification, and revised traffic information be provided to address Main Roads, DPLH comments, and the City's comments provided in the 'reason' column. These revisions need to be subject to addition review from the City and Agencies before the Structure Plan is determined.	City Comments <i>TIA</i> Section 4.3: Intersection control: The intersection of Local Distributor A (Brentwood Road N E) (approximately 6,500 vpd) and Local Distributor B (Brentwood Road S W (approximately 4,000 vpd), with a combined entering volume of around 10,500 vpd, meets the suitability criteria for a single-lane roundabout as outlined in Austroads Guide and Liveable Neighbourhoods. It is, therefore, recommended a single lane roundabout for this intersection. 2) Figure 20 Indicative Cross-Section – The proposed road reserve width of 12m for Access Street C is not acceptable, local street carrying < 1000 vpd shall be 14.2m as a minimum as per Liveable Neighbourhoods. <i>Intersection Modelling – Welshpool Road East (WRE)</i> The intersection layouts currently presented along WRE do not reflect the existing network characteristics accurately. Please note: a. A median is not required to be shown as a step-in arrangement in all scenarios. b. Intersections along WRE need to be re-examined and amended to reflect realistic geometry and operational conditions before SIDRA analysis is undertaken. 3. Trip Distribution Assumptions The TIA does not clearly state the assumptions used for trip distribution. <i>Mode Choice Modelling</i> For an LSP of this scale, mode choice assumptions must be explicitly discussed. Please clarify the mode share assumptions, methodology adopted, and how they have been applied in the trip generation and distribution process. <i>Traffic Modelling Requirements – TIA Guidelines Volume 2</i> As per the TIA Guidelines (Vol. 2), scenarios of this scale require macro-level network modelling (ROM or STEM) to understand broader network impacts. Considering the strategic significance and extent of the proposed LSP, it is strongly recommended that a network-level demand model be undertaken prior to detailed intersection analysis. <i>Growth Rate Derivation</i> While the methodology used to derive growth rates is

			noted, the TIA does not specify the actual growth rates adopted for modelling. Please include the final values applied in all scenarios (existing, interim, and ultimate).
2. DCP	Development Contributions Provisions	The City recommends the Structure plan be updated to include: 1. Detailed area calculations and landownership information for all proposed POS sites and drainage infrastructure. 2. Forecast costings for POS improvements, clearly distinguishing between basic standard and optional improvements (refer Appendix 2, LPP 32). 3. Forecast costings for drainage infrastructure. 4. Traffic Modelling Report. 5. Conceptual designs and forecast costings for all road infrastructure. 6. Land acquisition plans, identifying associated infrastructure and area requirements based on current lot boundaries.	Further information is required to demonstrate how equitable delivery of infrastructure upgrades can be achieved through the LSP process. Given the fragmented landownership, it is preferable for the LSP assessment and DCP scoping to occur in parallel to reduce the risk of development advancing without an agreed cost-sharing framework. LPP 28 explicitly identifies that LSPs should define infrastructure requirements.
3. Roads	Roads reserve width references	The City recommends the structure plan report be modified to ensure references to road reserve widths reflect standard Liveable Neighbourhoods width – with variations only acceptable in situations that facilitate the retention of existing trees, or strategic planting.	The City is not supportive of reduced road reserve widths unless there are unique circumstances that warrant departure from Liveable Neighbourhoods cross sections. Road reserves accommodate more than roads, they also facilitate pedestrian movement, infrastructure, and street trees. Reduction in road reserves would diminish the capacity for the Structure Plan to deliver its intended streetscape and community outcomes.
4. Precinct A	Non-residential land use	The City recommends the structure plan report be modified to include reference to landowner interest in Precinct A to pursue a non-residential outcome based on the planning merits, and unique history and constraints of Precinct A.	The City acknowledges that during the consultation period many landowners within Precinct A provided reasons why a residential outcome would not be the best planning outcome for that precinct. The City agrees that there may be merit in pursuing a light industry or similar land use designation over that precinct, however it would need to be supported by relevant technical information. This could take the form of a Structure Plan Amendment pursued by the landowner group.
5. POS Design	Public Open Space Design	The City recommends additional wording be provided in the draft Plan to allow variations to occur to the shape and location of POS areas, provided they remain within the area subject of the application, have no obvious impact on any future costs, and modifications facilitate a better planning outcome than the original design.	The City acknowledges that depending on the rate of development and the access and information available at the time, there is potential for improvements to the design and layout of POS areas.

6. Bushfire	Landscaping	The City recommends the draft Plan be modified to include greater references to bushfire friendly landscaping throughout the structure plan area.	The City acknowledges that extreme weather events can occur, and with extensive landscaping planned it is a great opportunity for bushfire resistant landscaping choices to be implemented.
7. Bus Stop Design	Public Transport Servicing	The City recommends the Structure Plan be modified to account for PTA bus stop location and design preferences.	
8. Aircraft Noise	ANEF References	The City recommends that the Structure Plan be updated to reflect the 2026 Airport Master Plan modelling, due to the Structure Plan being based on 2020 modelling. The City also recommends that the Structure Plan be modified to provide more clarity for existing and future landowners that additional building standards may apply in areas subject to noise impacts. These additional measures may have financial implications for new house builds. These modifications should reflect the three conditions recommended by Perth Airport.	Condition 1: Dwellings shall be constructed with insulation to meet Australian Standard AS2021:2015 Acoustics – Aircraft Noise Intrusion – Building Siting and Construction. Condition 2: The owner/applicant shall lodge a notification on the Certificate of Title informing current and prospective land owners of aircraft noise impacts. Condition 3: Proposed structures above 80m AHD must be referred to Perth Airport for assessment
9.	Minor Land Use Designation Changes	The City recommends the Structure Plan be modified to consider the designation changes proposed in submission 105	The design changes are located in a very constrained area of the Structure Plan area.