

## Tracey Cooney Walshe

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**From:** AHMAD Ikmal [Strategy and Planning] <Ikmal.Ahmad@education.wa.edu.au>  
**Sent:** Tuesday, 23 December 2025 11:41 AM  
**To:** Regan Travers  
**Cc:** Tracey Cooney Walshe; Cardia Mariani  
**Subject:** City of Kalamunda External Referral – Proposed Wattle Grove South Local Structure Plan (Ref: PG-DEV-067)  
**Attachments:** Response letter to City of Kalamunda on proposed Wattle Grove South Local Structure Plan.pdf; Attachment 1 - Alternative location for public primary school site - Wattle Grove South Local Structure Plan.PDF

OFFICIAL

Good morning Regan

Please find attached the Department's response letter and associated Attachment 1 in relation to the abovementioned proposal.

Thank you.

Regards  
Ikmal

### **Ikmal Ahmad**

**Principal Consultant – Land Planning**  
Infrastructure Strategy and Planning

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*For land planning referrals and queries, please email to [landplanning@education.wa.edu.au](mailto:landplanning@education.wa.edu.au)*

*For subdivision referrals and queries, please email to [subdivisionreferrals@education.wa.edu.au](mailto:subdivisionreferrals@education.wa.edu.au)*



## Shaping the future

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I respectfully acknowledge the Whadjuk Noongar people and their elders past, present and future. They are the traditional custodians of Mandalup (East Perth) where we work.

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**From:** AHMAD Ikmal [Strategy and Planning]  
**Sent:** Monday, 22 December 2025 3:28 PM  
**To:** 'Regan Travers' <Regan.Travers@kalamunda.wa.gov.au>  
**Subject:** RE: City of Kalamunda External Referral – Proposed Wattle Grove South Local Structure Plan (Ref: PG-DEV-067)

Hi Regan

Just a heads up that the Department's response for the abovementioned referral is currently being reviewed and awaiting sign off.

However, there is a high possibility that the Department may provide its submission latest by tomorrow, if not today.



Department of  
**Education**

Your ref: PG-DEV-067  
Our ref: D25/1259433  
Enquiries: Ikmal Ahmad  
(Tel: 9264 4435)

City of Kalamunda

Email: [enquiries@kalamunda.wa.gov.au](mailto:enquiries@kalamunda.wa.gov.au)

Attention: Regan Travers  
Manager Approval Services

Dear Sir / Madam

### **Proposed Wattle Grove South Local Structure Plan**

Thank you for your email dated 11 December 2025 and granting time extension to provide the Department of Education (Department) with the opportunity to comment on the proposed Wattle Grove South Local Structure Plan (Structure Plan).

The provision of a standalone 4.25 hectare (ha) public primary school site within the Structure Plan is commensurate with the anticipated student enrolment demand based on the proposed delivery of approximately 1666 dwellings/lots. However, should there be any further increase to the dwelling/lot yield, the Department reserves the right to undertake a further review of the Structure Plan to ensure that the public education needs are adequately met in line with the Western Australian Planning Commission's Operational Policy 2.4 – Planning for School Sites (OP 2.4).

#### Site assessment

Public school sites shall be located on developable and unconstrained sites to ensure the safety, health and wellbeing of students are protected and that the future operation and amenity of the schools are not compromised. However, the Structure Plan Report identifies the following risks to the siting of the public school site which are required to be addressed:

#### **a) Native flora and fauna**

Figure 5: Vegetation Condition Mapping (pg. 51) of the Structure Plan Report identifies the existing vegetation within school site to be 'Completely degraded' to 'Cleared'. However, in 'Table 2: Information to be submitted to address environmental considerations' (pg.23), it is indicated that Flora and Vegetation Survey Reports and Black Cockatoo Survey Reports are required for Precinct C, particularly for, in part, the following lots:

- Lots 803, 804 Crystal Brook Road; and
- Lots 502, 503 and 504 Brentwood Road.

Further, it states that a Conservation Area Management Plan; Environmental Offset Plan or Tree Canopy Retention and/or Landscape Management Plan is to be prepared based on the results of flora and vegetation and black cockatoo survey reports, including any environmental values that are identified from site surveys that require retention and rehabilitation.

The subject school site spans across multiple lots including the abovementioned lots. The school site should not feature any native vegetation, threatened fauna habitat, or need any State or Australian Government environmental approvals or offsets, or require significant areas of vegetation to be retained as these would impact the delivery of a compliant school site. It is critical that the Structure Plan Report identifies any potential

site constraints at this structure planning stage rather than deferring it to subsequent subdivision stage. Accordingly, further clarification is sought on this matter.

**b) Traffic and movement network**

School sites are required to be regular shaped to enable, amongst other things, seamless and gazetted road reserves (with minimum width of 17.9 metres) adjacent to school sites where possible. However, it is identified that the Access Roads along the northern and eastern boundaries of the school site are not connected to each other and instead, it relies on an internal road/ carpark for continuous access. Such configuration is not supported for the following reasons:

- The master planning of the school site has not occurred at this stage and thus, it should not be assumed that an internal road is warranted at that specific location. The Department does not support the school site concept plan as shown in the Structure Plan Report in order to maintain design flexibility on the school site to address any site variations and meet future educational demands or facilities. The Department strongly requests that the school site concept plan be removed from the Structure Plan Report, and the site be identified as a future primary school site.
- Given that the internal road is within the school site, it would be problematic in the event that access to the internal road/ carpark is required to be closed. This would restrict traffic circulation and pedestrian access, and compromise road safety which would not only impact the school community but nearby residents and visitors as well. In addition, there is also a potential risk whereby the internal road/carpark would become a thoroughfare for members of public accessing the subject two roads creating liability risks and maintenance obligations for the Department.

**c) High pressure gas pipelines**

Whilst the Dampier to Bunbury High Pressure Gas (DBPG) pipeline runs along the western boundary of the Structure Plan area. Most of the Structure Plan area, including the school site, fall within the Dampier to Bunbury High Pressure Gas Pipeline Trigger Distance.

The Structure Plan Report indicates that the DBPG's operator, Australian Gas Infrastructure Group, has advised that a nil and 90 metre setback from the gas easement may apply to residential lots and sensitive land uses respectively. Notwithstanding the school site is located more than 90 metres from the easement boundary, confirmation is sought on whether the school site, being a sensitive land use, is permitted to be located within the DBPG Pipeline Trigger Distance.

**d) Bushfire risk**

The school site is located directly adjacent to the Conservation Area reserve which presents a bushfire risk to the school site. Figure 24: Bushfire Attack Level Contour Plan (pg. 114) of the Structure Plan Report indicates that the school site would be impacted by Bushfire Attack Level (BAL) rating of BAL-29. To alleviate this bushfire risk, the Structure Plan Report contends that an internal road/ carpark would offer spatial separation between future school buildings and the Conservation Area reserve.

The presence of bushfire risk would result in the Department relying solely on building design/construction solutions, setting appropriate building setbacks or separation from fire sources. These could be challenging on an irregular shaped school site and compromise the ability of the school to increase student accommodation capacity or include new teaching facilities in the future. In addition, as highlighted previously, the master planning of the school site has not occurred at this stage and thus, it should not be assumed that an internal road is warranted at that location as presented on the school site concept plan.

**e) Standalone school site**

The provision of a 4.25 ha school site suggests that the school site is a standalone site. However, section 6.3 of the Structure Plan Report (pg. 106) states the following:

*“The proposed Wattle Grove Primary School is intended to function as a:*

- *Community Gathering Space: providing spaces for various community events, such as meetings, festivals, and recreational activities, making it a focal point for social interaction.*
- *Shared Facilities Location: It shall offer shared facilities including the sports grounds, function spaces, benefiting both students and the wider community.”*

It should be highlighted that a standalone school site is to be utilised exclusively for the function and operation of a public primary school and not for other purposes. Whilst the Department recognises the significance of creating synergies with co-located community infrastructure and facilities, it needs to ensure that such arrangement does not compromise a school’s ability to deliver educational and recreational/ sporting programs that support its curriculum.

The OP 2.4 makes special provisions for cases where a school site could be co-located with an active Public Open Space (POS). In such a configuration, the effective school site area could be reduced to 3.75 ha with the essential facilities and infrastructure for the functioning of the POS to be fully incorporated and contained on a separate adjoining open space lot or Crown reserve. This arrangement requires a shared use agreement between the Department and the local government to outline shared use, management, maintenance obligations and cost sharing structures.

Furthermore, it is also worth noting that there is an existing public primary school which is named Wattle Grove Primary School in the locality. Referencing the future school site as the ‘proposed Wattle Grove Primary School’ is therefore not supported.

Accordingly, the Department requests that the abovementioned paragraph in section 6.3 of the Structure Plan Report be deleted.

**f) Groundwater allocation**

The Structure Plan Report does not include any commentary on whether there is sufficient groundwater allocation across the Structure Plan area. A reduced groundwater allocation would have a significant impact on both standalone and shared use oval and landscape irrigation.

**Recommendation**

In view of the above, the Department has no in-principle objections to the proposed Structure Plan subject to the above matters being addressed.

Opportunity exists for the proposed school site to be relocated slightly to the south to enable the creation of a more regular shaped site and bounded by four road reserves which are connected and gazetted (refer to Attachment 1). This will facilitate school site planning, enhance traffic circulation and access, promote active travel, and alleviate any bushfire risk from nearby POS.

However, the relocation is also contingent on the status of the site conditions particularly any significant flora and fauna. It is noted that there are several supporting technical reports attached to the Structure Plan Report. However, these reports were not available on the City of Kalamunda’s website during the consultation period. In the absence of such reports, the Department is unable to undertake detailed site assessment on the school site.

The Department welcomes the opportunity to discuss with the City of Kalamunda on the above matter and consider any alternative design proposals to ensure that a compliant public primary school site could be delivered within the Structure Plan in accordance with the provisions of the OP 2.4.

Should you have any questions in relation to the above, please do not hesitate to contact Mr Ikmal Ahmad, Principal Consultant – Land Planning on 9264 4435 or via email [ikmal.ahmad@education.wa.edu.au](mailto:ikmal.ahmad@education.wa.edu.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Chris Della Bona". The signature is fluid and cursive, with the first name "Chris" being the most prominent.

Chris Della Bona  
**A/ Manager Land and Planning**

23 December 2025



Figure 22. Indicative Internal Road Hierarchy Map