

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

AGENCY COMMENT (SUMMARY) Refer Attachments for individual agency’s full submission response	CITY’S COMMENTS
1. DEPARTMENT OF FIRE AND EMERGENCY SERVICES (DFES)	
<p><i>DFES advises that the BMP has not demonstrated that the proposed LSP complies with the following requirements of SPP 3.7 and the Guidelines:</i></p> <ol style="list-style-type: none"> <i>1. Element 2: Siting and Design; and</i> <i>2. Element 3: Vehicular Access.</i> <p><i>DFES recommends the BMP be modified as per the Assessment advice provided in Tables 1 and 2 to ensure it is accurate and the bushfire risk management/mitigation measures are effective and can be implemented in perpetuity to manage/mitigate the bushfire risk to people, property and infrastructure to an acceptable level and appropriate to the proposal and location.</i></p> <p><i>The required modifications are listed in the table(s) below. Should the modified BMP affect the design of the proposal, the proposal should be amended to reflect these modifications</i></p>	<p>The City notes the comments from DFES and recommends that the applicant provide an amended BMP to address the concerns raised by DFES in relation to siting and design and vehicular access, in addition to the draft Plan be modified to include greater references to bushfire friendly landscaping throughout the structure plan area.</p>
2. DEPARTMENT OF PLANNING, LANDS AND HERITAGE (ROAD PLANNING) (DPLH ROAD)	
<p><i>Recommendations:</i></p> <ol style="list-style-type: none"> <i>1. The Applicant should confirm that the proposed Tonkin Highway upgrade and new interchanges will not require additional land from the LSP area.</i> <i>2. The Applicant should demonstrate and clarify that the proposed left-in and left-out intersection to/from Welshpool Road does not interfere with the proposed upgrade of the Tonkin Highway – Welshpool Road Interchange, and that the location is acceptable to Main Roads WA and the City.</i> <i>3. With reference to Section 4.4 of the TIA, the Transport Consultant has proposed reducing motorists’ speeds along Welshpool Road and Crystal Brook Road; however, any change to speed limits is subject to Main Roads’ approval. To assess the feasibility of the proposed speed reductions, the Consultant should conduct assessments in accordance with Main Roads’ Speed Zoning Policy.</i> <i>4. The Applicant utilised Sydney’s trip generation rates from the Guide to Transport Impact Assessment (ver. 1.1) published by TfNSW. The Applicant should instead use trip generation rates for the residential component of the proposed LSP from the WAPC’s Transport Impact Assessment Guidelines or trip generation rates for regional NSW. Accordingly, Table 7 of the TIA and all related sections, tables, and figures, including SIDRA Intersection models, should be updated.</i> 	<p>The City acknowledges the submission and comments that identify improvements required to the traffic information.</p> <p>The City recommends these matters be addressed through modification of the Structure Plan.</p>

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

<p>5. <i>With reference to Section 7.6 of the TIA, the Applicant’s transport consultant accepted direct property access from Crystal Brook Road. As per Table 11, Crystal Brook Road is proposed to be a District Distributor B road carrying between 5,000 and 7,000 vehicles per day (noting that these values may change due to increased trip generation rates). According to the Residential Design Codes, all vehicles are required to ingress and egress in forward motion for lots with access from Integrator A or B roads. Accordingly, frontages and lot sizes should be further refined at subdivision stage.</i></p> <p>6. <i>The Applicant should provide the digital version of the SIDRA Intersection models.</i></p> <p>7. <i>The proposal should be forwarded to Main Roads WA for further consideration.</i></p>	
<p>3. DEPARTMENT OF WATER AND ENVIRONMENTAL REGULATION (DWER)</p>	
<p><i>Thank you for the above referral. The Department of Water and Environmental Regulation (DWER) has considered the proposal and at this stage cannot support the proposal for the following reasons:</i></p> <p><i>Environmental Protection Authority (EPA) Assessment</i></p> <p><i>In July 2025 the Environmental Protection Authority (EPA) released its report on the proposed Metropolitan Region Scheme Amendment (EPA Report 1788 (July 2025) on Metropolitan Region Scheme Amendment 1388/57). Since then the EPA’s Report and Recommendations has been under appeal with the Office of the Appeals Convenor as this appeal is still ongoing and unresolved. The EPA’s Report and Recommendations will impact on the proposal, including the draft Wattle Grove South District Water Management Strategy (hyd2o, June 2021) prepared to support the Metropolitan Region Scheme Amendment, the draft Wattle Grove South Local Water Management Strategy (hyd2o, August 2025), and the required future urban water management plans that will be the responsibility of the City of Kalamunda to approve. The proposal Local Structure Plan cannot be assessed until the resolution of the appeals against the EPA’s Report and Recommendations.</i></p> <p><i>District Water Management Strategy</i></p> <p><i>The draft Wattle Grove South District Water Management Strategy (hyd2o, June 2021) prepared to support the Metropolitan Region Scheme Amendment has not yet been endorsed by the DWER, the Department of Biodiversity, Conservation and Attractions (DBCA) and the City of Kalamunda. Therefore the draft Wattle Grove South Local Water Management Strategy (hyd2o, August 2025), supporting this proposed Local Structure Plan, cannot be relied upon and may be inaccurate, inappropriate and/or require substantial modification. Until such a time as the District Water Management Strategy (DWMS) is endorsed by all relevant Government agencies or the Metropolitan Region Scheme is finalised without the DWMS being endorsed, the Local Water</i></p>	<p>The City acknowledges the submission and inability to assess given the Structure Plan is out of sequence with the MRS Amendment.</p> <p>The City’s expectation is that further opportunity for Agency and the City to review water documents will be facilitated by DPLH prior to the Structure Plan being determined.</p>

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

<p><i>Management Strategy (LWMS) and Local Structure Plan cannot be assessed.</i></p> <p>Local Water Management Strategy</p> <p><i>As above the draft Wattle Grove South Local Water Management Strategy (hyd2o, August 2025), supporting this proposed Local Structure Plan, cannot be relied upon or assessed in the absence of an endorsed DWMS. The DWER is aware that this LWMS has been prepared but has not yet undertaken an assessment.</i></p>	
<p>4. DEPARTMENT OF EDUCATION (DOE)</p>	
<p>Recommendation</p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>The City acknowledges the submission and concerns raised. The City considers the location of the school site to be spatially appropriate, noting that adjusting the location of the school site appears unlikely to substantially resolve the issues raised.</p> <p>As such, the City is not recommending any changes to the Structure Plan with regards to the School site.</p>
<p>5. MAIN ROADS WESTERN AUSTRALIA (MRWA)</p>	
<p>Refer to attachment 17</p>	<p>The City acknowledges the submission which due to its length has not been included in this table, but is attached to this report, and the request for additional information.</p> <p>The City notes that itself, and DPLH Roads branch require further information to be submitted and considered.</p>

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

	<p>The City recommends that the Structure Plan be updated to address the comments within Main Roads submission.</p>
<p>6. PERTH AIRPORT</p>	
<p>Refer attachment 18</p>	<p>The City acknowledges the submission, which due to its length has not been included in this table, but is attached to this report.</p> <p>Aircraft noise is certainly a consideration, and the City recommends that the Structure Plan be updated to reflect the 2026 Airport Master Plan modelling.</p> <p>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.</p>
<p>7. PUBLIC TRANSPORT AUTHORITY (PTA)</p>	
<p><i>The PTA's comments are as follows:</i></p> <p>1. <i>There is potential for a future bus route along the neighbourhood connector roads which would provide a connection to High Wycombe Station. To facilitate a bus route the road network within the WGSLSLSP must provide:</i></p> <p><i>(a) A bus terminus within the WGSLSLSP area in the form of an embayment. The embayment will need to accommodate 2 standard buses therefore requires dimensions of 30 metre length with tapers, 3.5metre width.</i></p> <p><i>(b) Lane widths of between 3.2 and 3.5m with a median.</i></p>	<p>The City acknowledges the submission and notes the PTA comments.</p> <p>The City considers there to be ample opportunity – and merit – in ensuring the Structure Plan can facilitate a future bus route.</p> <p>The City recommends the Structure Plan be modified to account for PTA bus stop location and design preferences.</p>

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

<p>2. <i>The terminus should be located at either the future Primary school or adjacent to one of the public open spaces (recreation) located along the bus route. When considering the position of the terminus the road network should incorporate a roundabout near the terminus to allow buses to turn around while avoiding the need for the bus to traverse local streets. Further discussions with Transperth will be required as the road network and development progress to ensure adequate provision for this future bus route and public transport access.</i></p> <p>3. <i>Proposed sensitive land uses around the terminus will require a notification on title advising of the potential for the property to be impacted by public transport noise. A notification on title would be recommended at the subdivision stage to allow the terminus to operate unimpeded.</i></p>	
<p>8. WATER CORPORATION</p>	
<p><i>Water</i> <i>Reticulated water is not immediately available to serve the subject area. All water main extensions for the subject area, must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice. Wastewater</i> <i>Our long-term wastewater planning for the subject area indicates that large, headworks-sized sewerage mains which will be extended from the existing DN900 sewer main on the corner of Bickley near Dulwich St in Maddington, to service this and other land in the area. These headworks wastewater infrastructure items are not scheduled on Water Corporation’s 5-year Capital Investment Program. The interim solution that is mentioned in the Structure Plan report i.e. “To enable the initial development of the site, an interim solution involving the extension of gravity sewer mains from the Wanaping Road Pump Station No. 7 along Wanaping Road, Bickley Road and Brentwood Road to the site is proposed. A Water Corporation scoping report for the delivery of the interim solution is currently being prepared” has been confirmed by the Corporation’s Asset Investment Planning Business Unit.</i></p> <p><i>General Comments</i> <i>The information provided above is subject to review and may change. If the proposal has not proceeded within the next 12 months, please contact us to confirm that this information is still valid.</i> <i>Please provide the above comments to the landowner, developer and/or their representative.</i></p>	<p>The City acknowledges the submission and notes Water Corporation comments. These comments do not trigger any modifications to the Structure Plan.</p>
<p>9. DPLH ABORIGINAL HERITAGE</p>	
<p>Thank you for your electronic correspondence of 27 November 2025 seeking comment from Aboriginal Heritage Conservation regarding the proposed Wattle Grove South Local Structure</p>	<p>The City notes that the applicant is aware of their obligations under the Aboriginal Heritage Act and</p>

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

<p>Plan (LSP). We apologise for our delay in responding to your request and understand submissions for this LSP have now closed. However, for your records and information we decided to still provide the below comments to the City.</p> <p>We note Aboriginal Cultural Heritage features heavily in the Structure Plan and should be commended. This includes section ‘4.2.6 Aboriginal Heritage’, that acknowledges the presence of Registered Site ID 4343 (Brentwood Road Swamp) falling within the Structure Plan boundary. It also correctly acknowledges the need for Ministerial Consent under Section 18 of the Aboriginal Heritage Act 1972 and consultation with the relevant Traditional Owners should any disturbance of this site be proposed.</p>	<p>consultation requirements to ensure any disturbance to the site is managed appropriately.</p>
<p>10. APA Group (pipeline)</p>	
<p>No substantive comment.</p>	<p>The City notes the submission.</p>
<p>10. Department of Health</p>	
<p><i>The Wattle Grove South Local Structure Plan (LSP) facilitates the coordinated delivery of residential land in Wattle Grove South, as defined by the Urban zone created under Metropolitan Region Scheme Amendment No.1388/57. The Structure Plan covers multiple land parcels across approximately 126 hectares south of Welshpool Road East and Crystal Brook Road, and north of Tonkin Highway. The LSP additionally proposes a new primary school, areas of POS and potential incorporation of a Local Neighbourhood Centre in Precinct A.</i></p> <p><i>Current land uses within the area comprise a mixture of residential, semi-rural living and rural land uses. Historical aerial imagery from 1953 demonstrated rural land uses including equestrian activities, and two separate areas of the site were historically used as former poultry farms. Lots 303, 53, 213 and 214 were most recently used as a turf farm, but ceased operation due to the intention to commence urban development. The City of Gosnells former Kelvin Road Landfill borders the southeastern boundary of the site, with landfill gases (such as methane and carbon dioxide) confirmed in previous investigations to be present on the perimeter of the site.</i></p> <p><u>Service infrastructure</u> <i>All developments subject to connection to drinking water and sewage services provided by a licensed service provider. DoH does not support on-site wastewater disposal within this structure plan</i></p>	<p>The City notes the submission and design considerations.</p>

Amenity – Chemical hazards

The site has not been classified as a C-RR1, CRU2, RRU3 as recorded on DWER’s Contaminated Sites database (Contaminated Sites Act 2003). However, although this site does not appear on Contaminated sites, it may be subject to other important classifications not recorded on that database. The proponent should obtain a Basic Summary of Records relating to the land and its surroundings to complete their assessment of the site’s suitability for a rezoning to a more sensitive land use. Schedule 1 — Forms . A guide to contaminated sites available here: [Guideline: Identification, reporting and classification of contaminated sites](#)

- The site historically was used for intensive agricultural purposes (poultry farm) and most recently as a turf farm which are a potentially contaminating land uses as set out in DWER’s “Assessment and management of contaminated sites” (DWER Nov 2021) Appendix B. It is appropriate and efficient that these matters are comprehensively addressed through the land planning process.*
- The storage and use of agricultural chemicals, fuels and wastes are associated with contaminated sites, and other hazardous materials including asbestos should be safely removed from buildings prior to demolition and clearance to avoid the creation of new contaminated sites.*
- DoH recommends the site be subject to undertaking a soil and groundwater contamination risk assessment prior to determining suitability of the site for urban development. The City of Gosnells former Kelvin Road Landfill borders the southeastern boundary of the site, with landfill gases (such as methane and carbon dioxide) confirmed to be generated on the perimeter of the former landfill site. Prior to commencement of subdivision and development works for sensitive land uses, investigation for soil, groundwater and landfill gas/vapour contamination should be carried out to determine if remediation is required. If required, remediation, including validation of remediation shall be completed to the satisfaction of the City of Kalamunda on advice from the Department of Health, to ensure that the site is suitable for the proposed sensitive land uses and poses no unacceptable risk to human health.*
- The site is within an area that may be affected by bushfire. The impacts and public health risks from bushfire, now and into the future will need to be assessed and managed*

Amenity – Medical entomology

The subject land is in a region that experiences occasional 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

ATTACHMENT 22 – COMBINED EXTERNAL REFERRAL SUBMISSIONS AND CITY’S COMMENTS

disease occur annually in this general locality, with 61 cases recorded in the City of Kalamunda in the past 6 years.

To protect the health and lifestyle of communities, all land use planning decisions should include consideration of mosquitoes and their management. It is recommended that:

- The proponents work with the City of Kalamunda environmental health team to determine the extent of risk from mosquitoes and mosquito-borne disease for the location.*
- If that risk is considered medium or high by the City, a mosquito management plan should be established and adequately funded*
- The City of Kalamunda ensures they have sufficient resources to continue mosquito management for any future development associated with the local structure plan*

Further suggestions for planning guidance:

If the land is found to be suitable for the proposed uses, after the public health risks have been determined, and mitigations strategies designed and agreed:

- 1. Public health needs should be considered in the design stages to ensure developments do not impact negatively on the health and wellbeing of future populations living in or around the area. For guidance and incorporation, download the Departments public health considerations for residential estates and urban developments from this link: Residential estates precincts and urban developments.*
- 2. Consideration should also be given to incorporating Healthy Active by Design Healthy Active by Design | Urban Health Resources*
Should you have any queries or require further information, please contact System Performance on 9222 2000 or eh.eSubmissions@health.wa.gov.au.