

Submitter No.	Comment	City Response	Applicant Response
1	<p>Support - I'm happy this development is moving ahead as I feel this will bring practical and sensible use of an area perfect for quality family homes as has occurred in the subdivision to the West. That used to be a pretty degraded rural area where many properties were run down rubbish tips. Now it houses a pretty up market highly valued properties utilising the land to the peak of its potential while still having great natural resources in the wetlands and meandering Brook traversing the area where all the residents can enjoy. This can be the future of Wattle Grove South and east where the Crystal Brook cuts through.</p> <p>The subdivision plan should really encompass the remaining land both to south and north to take in the watercourse and the at present silly separation with of all things a lifestyle village. It does look pretty stupid to be approving pieces of an area that has in the 40 years I've been here regarded as one. Please try to do this in one move and at the same time cut the bushfire danger for the whole area.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Sensible location for new homes</li> <li>- Consideration of watercourse</li> </ul> <p>The identification on the area for future development is generally consistent with the principles of orderly an proper planning as it applies to areas for residential growth.</p> <p>This draft plan is limited to the current MRS area, however, the state government can consider expanding investigation areas within the City.</p>	<p>Comments of support are noted. Whilst we acknowledge your suggestion to encompass the remaining land to the south and north, the Wattle Grove South Structure Plan proposal is focussed on the future planning for the Urban Zoned area that is being proposed under the Metropolitan Region Scheme.</p>
2	<p>Object - I wish not to develop my land my family wants to remain as is this is the reason why we bought acres for to have this lifestyle</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Character impact</li> <li>- Amenity impact</li> </ul> <p>Existing landowners will be able to retain their existing lifestyle on their own property, however over time – should the draft plan be approved – other surrounding landowners may choose to realise subdivisions in accordance with an approved structure plan.</p> <p>When fragmented land is developed under a structure plan it is common for existing landowners to seek homestead subdivision designs in order to retain existing houses, and use the remainder of their land for residential subdivision.</p>	<p>It is important to reiterate that no landowner is obliged to participate in developing their land. Existing uses may continue. The Wattle Grove South Structure Plan provides the opportunity for landowners to divest or develop their land.</p> <p>Landowners can continue to use their land in accordance with existing approvals. This Structure Plan therefore provides a key step to unlock the potential of your land, providing you with options now or in the future to pursue the subdivision of the land (subject to a separate application to the Western Australian Planning Commission).</p>
3	<p>Support - Please don't go to ridiculously small blocks, make it 500's as a minimum so people can have a small backyard and you're not hearing everything your next door neighbour is doing.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Lot size preferences of 500m<sup>2</sup></li> </ul> <p>The draft plan facilitates a range of potential lot sizes. Currently due to housing affordability there is high demand for lots smaller than 500m<sup>2</sup> – even below 200m<sup>2</sup>.</p> <p>The draft through its ranges of densities is likely to facilitate the different needs of future landowners. If future landowners are concerned about their proximity to their neighbours, the City anticipates that the draft Plan would include lots which facilitate those needs.</p>	<p>Comments of support are noted. The Structure Plan provides flexibility for landowners to deliver a range of lot sizes, which includes 500sqm lot sizes. In order to provide for a diverse range of lot sizes to cater to a wider sociodemographic market, it is anticipated some larger lot product (R20) may be provided across the Structure Plan area.</p>
4	<p>Comment only - we have a lot of residential property already, the traffic light between Hale road and Tonkin HWY always have traffic Jam. we need a cross bridge for that. if more residential property in this area, can we have</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Traffic issues</li> </ul>	<p>There are proposed upgrades to the Tonkin Highway and Welshpool Road intersection by Main Roads WA which should improve traffic movement</p>

	another big public Oval(no needs to go Forresterfield) or another small shopping centre such as COLES OR WOOLWORTH	<ul style="list-style-type: none"> <li>- Additional recreational facilities</li> <li>- Additional shopping centre</li> </ul> <p>The Administration notes that existing matters elsewhere are generally outside the scope of this proposal – but are noted as anecdotal experience when growth areas are subdivided.</p> <p>Please refer to body of the report for detailed discussion regarding traffic, recreational facilities, and additional commercial development.</p>	in this locality. The timing and implementation of these initiatives are being undertaken by Main Roads WA, not the proponents of this structure plan for Wattle Grove South.
5	<p>Object - I strongly oppose the purported Wattle Grove South structure plan. I have rejected this plan several times before with the majority of residents overwhelmingly rejecting it as well. It's a bit like the No Vote for the voice, it just keeps coming back to haunt us. It directly effects our family and the lifestyle we chose and denies us landowners procedural fairness. In the last few weeks I have stood and watched over a dozen Zanthorea native trees dug up and taken away on the back of trucks , our native flora and fauna just ripped away from us and it saddens me to the core and our city does nothing to protect it. So, I strongly appose the Wattle Grove SOUTH structure Plan.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Existing landowners will be able to retain their existing lifestyle on their own property, however over time – should the draft plan be approved – other surrounding landowners may choose to realise subdivisions in accordance with an approved structure plan.</p> <p>Information supporting the draft Plan indicates significant research has taken place to identify genuine opportunities for retention of vegetation. The Administration notes that conservation spaces are provided for the specific purpose of vegetation protection.</p> <p>Please refer to body of the report for detailed discussion regarding vegetation and trees.</p>	The Wattle Grove South Structure Plan provides the opportunity for landowners to continue to use their land. It does not force landowners to move from their homes and land. Strategic planning for the area has been progressed for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore consistent with the ongoing planning for this particular area. We are unaware of trees being removed from the site, as suggested in this comment. The proposed Structure Plan design seeks to retain as many significant and healthy trees as possible as part of this future community.
6	<p>Object - I, [redacted] in Wattle Grove, oppose the Wattle Grove South Structure Plan because this area is home to threatened species and is connected to sensitive wetlands. Urban development cannot be decided lightly. The land is still Rural, the rezoning has not been approved, and the EPA is still assessing the environmental impacts.</p> <p><b>Proper planning and environmental assessment must come first.</b></p> <p><i>Please keep Wattle Grove South Zoned Rural!</i></p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Environmental impact</li> <li>- Procedural concerns.</li> </ul> <p>The Administration notes that the draft Plan is not capable of approval until the MRS Amendment and Environmental Review have been completed. Those matters being undetermined does not impact the draft Plan being progressed.</p> <p>If the MRS Amendment is not supported by the WAPC, then this draft Plan would be withdrawn and not finalised.</p>	<p>The Environmental Protection Authority (EPA) has undertaken its assessment of impacts for MRS Amendment 1388/57 (EPA Report 1788), and advised the Minister for Environment that it had assessed the potential environmental impacts, considered the proposed management measures being able to mitigate these impacts and recommended that the amendment may be implemented, subject to the recommended environmental conditions.</p> <p>The draft Environmental Conditions of MRS Amendment 1388/57 requires: · the retention and conservation of native vegetation containing threatened ecological communities, threatened flora, medium to high quality foraging habitat for black cockatoos · future urban development to avoid or minimise adverse impacts to the Greater</p>

			Brixton Street Wetlands. Furthermore, the Conservation Area Management Strategy which was prepared to support the Local Structure Plan provide a framework to facilitate future on ground management to protect, maintain and enhance the significant vegetation, flora and fauna within the proposed conservation areas as urban subdivision and development of the site progresses
7	<p>Object - This area of land holds so much rich flora and fauna. It's people's lifestyle homes. We live here because we want space. As a resident and a ratepayer, I expect the city to protect our environment and community. The community has already rejected this type of development in Wattle Grove South.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Environmental Impact</li> <li>- Amenity impact</li> </ul> <p>Existing landowners will be able to retain their existing lifestyle on their own property, however over time – should the draft plan be approved – other surrounding landowners may choose to realise subdivisions in accordance with an approved structure plan.</p> <p>Information supporting the draft Plan indicates significant research has taken place to identify genuine opportunities for retention of vegetation. The Administration notes that conservation spaces are provided for the specific purpose of vegetation protection.</p> <p>Please refer to body of the report for detailed discussion regarding vegetation and trees.</p>	<p>The significant vegetation, flora and fauna values within the Wattle Grove area are recognised. The Structure Plan and accompanying Conservation Area Management Strategy have been developed to ensure future development is sympathetic to the natural environment and its significant values by ensuring the proposed conservation areas are set aside in public open space and protected. Further, the Environmental Conditions for the MRS amendment will require the preparation of Conservation Area Management Plan/s prior to subdivision or development to ensure these conservation areas and their significant values area maintained and enhanced for the long-term. Strategic planning for the area has been progressed for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore consistent with the ongoing planning for this particular area.</p>
8	<p>Object - The zoning of the blocks is an absolute disgrace! The plan is designed for families with a primary school yet the size of the blocks are not suitable for building a family home and raising a family. The majority of block sizing should be 500sqm and above.</p> <p>Even as someone that would consider buying an investment in the area, these land sizes are not appealing!</p> <p>The blocks sizing is purely money making by the developer, not looking at what is suitable for families. This further pushes up housing prices of the larger blocks of land making it further unaffordable to everyday family!</p> <p>The streets with such high density housing become clogged with cars as there is never sufficient parking area in driveways. Just look at all high density housing build in the CoK.</p> <p>With such smaller block will result in social problems as it caters purely for lower socioeconomic people.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Larger lots</li> <li>- Housing price impacts</li> <li>- Traffic impacts</li> <li>- Socioeconomic impact</li> </ul> <p>The Administration notes lot size preferences. The draft plan facilitates a range of potential lot sizes. Currently due to housing affordability there is high demand for lots smaller than 500m<sup>2</sup> – even below 200m<sup>2</sup>.</p> <p>The draft through its ranges of densities is likely to facilitate the different needs of future landowners. If future landowners are concerned about their proximity to their neighbours, the City anticipates that the draft Plan would include lots which facilitate those needs.</p>	<p>The Structure Plan contemplates a general residential density range of R20 to R40 across the subject site, with single dwellings and R30 lots forming the predominant form of housing. In order to provide for a diverse range of lot sizes to cater to a wide socio-demographic market, it is anticipated some larger lot product (R20) may be provided across the Structure Plan area. It is agreed that sufficient space is provided for carparking on driveways for visitors/residents. This will be achieved by providing appropriate building setbacks to garages as part of the finer detail of planning and design.</p>

		<p>The Administration notes concerns regarding socioeconomic impact. Smaller lots are likely to be more affordable.</p> <p>Please refer to body of the report for detailed discussion regarding traffic.</p>	
9	<p>Comments only - Wondering what the plan is in upgrading the intersection of crystal brook road and Welshpool road east. As this plan involves adding substantial traffic in and out of the new subdivision due to the number of houses and new primary school involved. As I travel through this intersection regularly I would hate to see issues like with the intersection of Welshpool road east and Lewis road which is a known black spot.</p> <p>Thank you for your time.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding traffic.</p>	<p>The Structure Plan's Transport Impact Assessment recommends to the City of Kalamunda and Main Roads WA that the Welshpool Road East / Crystal Brook Road / Brentwood Road intersection be upgraded to a four-way roundabout configuration to accommodate the project traffic volumes in the full build-out year 2040 scenario.</p>
10	<p>Object - We are not cok but this plan affects our property as it shows a link to Kelvin road a few properties down from our house to Valcan Road. Half the road is cok the other half is cog.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> </ul> <p>The Administration refers to the Applicant's comments for explanation of the link.</p>	<p>No direct connection between this Structure Plan and Kelvin Road is proposed, however this connection could be developed by others in the future. The connection is shown as an opportunity for improved connectivity for future bus movements, should the City of Kalamunda and the City of Gosnells see a benefit for the broader community.</p>
11	<p>Support - I fully support the plan but the City needs to look at the road infrastructure in this area and not keep making excuses for not doing anything. I have spoken at council on this many times. The city needs to be proactive not reactive.</p> <p>I would also like to be informed of any kind of public information regarding this or any other daps in the Wattle Grove area. My neighbour informed me of this from a letter drop which I had not received from the city.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul> <p>The Administration notes that the best method of staying informed is my signing up to the City's Engage communications portal, where major projects and application are published.</p>	<p>Comment of support noted.</p>
12	<p>Object - We do no accept this plan.</p> <p>We have been building our amazing home for the last 12 years, in which we want our kids to grow up in. We have already been pushed from land on Sheffield road, Arthur rd and Courtney place. Sick of it.</p> <p>We not only will lose our home but our respective businesses.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Business impact</li> </ul> <p>The Administration notes lifestyle concerns, and the referenced areas. All of those places were identified for investigation for zoning changes well in advance of the zoning changing – the same applies to Wattle Grove South.</p> <p>The Administration notes concerns regarding businesses. In the event of zoning changes all approved activities can continue under the planning principle of 'non-conforming use rights' however these typically permit continuation, but not expansion.</p>	<p>This Structure Plan does not prevent landowners from continuing to use their land for existing approved land uses. Landowners and businesses can remain on their land, and will be able to continue to operate in accordance with existing approvals.</p>

		Please refer to body of the report for detailed discussion regarding existing businesses, and future businesses.	
13	Support - I support the rezoning to provide more housing via subdivision in the Wattle Grove South development	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Additional housing</li> </ul> <p>The additional housing facilitated by the draft Plan is identified in the City's Housing Strategy as an important factor in catering for the needs of the existing residents of the City, and orderly growth.</p> <p>Due to the constrained nature of the darling scarp area the City's areas for growth are limited, and some parts of the foothills area are well suited to a transition from Rural to Urban.</p>	Comments of support are noted. This area has been earmarked for further planning and development for residential purposes by both the Western Australian Planning Commission and the City of Kalamunda for a long time now. The proposed structure plan provides an important step in delivering housing for the City of Kalamunda community.
14	Object - I do not support this development planning and even further disagree even more with industrialisation of this area. This should be converted to minimum 2.5 acre rural lifestyle lots. This development will rapidly increase traffic in the area which will see the surround area which is a quiet rural area with bridal tracks on the sides of the road destroyed. It will be a destruction of native flora and fauna in the area. Increased traffic is likely to increase likely incidents for horse riders local to the area. Many people have fought hard over the years to keep and protect the foothills. Protect nature and its rural areas once it's gone it's lost forever.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Concern regarding Industrial</li> <li>- Preference for rural lifestyle subdivision</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding industrial, amenity, and environmental impacts.</p>	The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips. The significant vegetation, flora and fauna values within the Wattle Grove area are recognised and protected as part of the design and management solution. The Structure Plan and accompanying Conservation Area Management Strategy have been developed to ensure future development is sympathetic to the natural environment and its significant values by ensuring the proposed conservation areas are set aside in public open space and protected. Further, the Environmental Conditions for the MRS amendment will require the preparation of Conservation Area Management Plan/s prior to subdivision or development to ensure these conservation areas and their significant values area maintained and enhanced for the long-term.
15	Object - Good afternoon <i>I do NOT support urban development in Wattle Grove South. We value our rural environment, wildlife, tree canopy, spacious lots, and peaceful lifestyle. There is minimal community support for this development which the City of Kalamunda chooses to overlook.</i>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Environmental impact</li> <li>- Amenity impact</li> <li>- Perception of community objection</li> </ul> <p>Please refer to body of the report for detailed discussion regarding environmental and amenity impact.</p> <p>Going through the local structure plan process which involves community consultation will provide insight for Council to consider when it makes a recommendation on the Local Government Report.</p>	Strategic planning for the area has been progressed for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore consistent with the ongoing planning for this particular area.

16	<p>Support - 1) In relation to the northern corner where Precinct A connects with Welshpool Road, please adjust the plan to have a landscape strip to Welshpool Road then road and then street facing properties, as appears to be the proposed approach to the Tonkin Hwy frontage. The context east of Tonkin Hwy is legacy rural / hills bush so this must surely be maintained. A back fence / wall is a terrible approach.</p> <p>2) Please ensure there are tight controls (and encouragement) around existing endemic tree retention including on newly created residential lots, in verges etc. Bushmead south is a pretty good example.</p> <p>3) Consider two storey townhouse lots (R60?) with rear lanes around parks again similar to Bushmead south. They have achieved a good balance.</p> <p>4) It will need local shops to be in line with liveable neighbourhood planning. I see there is a possible future one further east. Could not this be near the proposed primary school in this plan eg. on the south east side of the proposed POS and linking all the way back to Crystal Brook?</p> <p>Thanks.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Character impacts (bush into noise wall)</li> <li>- Environmental impact (tree retention)</li> <li>- Appropriate medium density in high amenity areas</li> <li>- Bushmead example</li> <li>- Location of neighbourhood amenities.</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the proposed LSP land use designations and layout.</p>	<p>Comments of support noted.</p> <p>A landscape strip adjacent to Welshpool Road could be considered as one approach to the interface. This interface can approach can be considered as part of detailed subdivision design. Controls will be in place for tree retention within public open space, road reserves, and where relevant within front lot setbacks. Townhouse lot product can be considered by developers for each of the Precincts. The structure plan acknowledges the opportunity for a Neighbourhood Activity Centre in Precinct A. This is subject to further investigations undertaken by Precinct A landowners. Spatially, the Department of Education does not support shopping centres being co-located with school sites.</p>
17	<p>Object - <i>I oppose the Wattle Grove South Structure Plan. The land is still Rural, the rezoning has not been approved, and the EPA is still assessing the environmental impacts. It is premature and arguably unlawful to progress a structure plan at this time. As a resident and ratepayer, I expect the City to follow lawful planning processes and protect our environment and community. This proposal is premature, arguably unlawful and not in the public interest.</i></p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Procedural concern</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the legitimacy of the draft Plan.</p>	<p>The draft structure plan can still be progressed concurrently with the Metropolitan Region Scheme (MRS) amendment. The parallel assessment of the structure plan with the MRS amendment provides a distinct benefit for agency assessors by providing another level of detail, resulting in a more informed proposal. The structure plan is therefore deemed necessary for the purposes of orderly and proper planning.</p>
18	<p>Support - Wattle Grove is reasonably close to the City and well connected with major highways. I would like to see this area as a residential area which will support general public to access/build a house and assist the community in this housing crisis period.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Additional housing</li> </ul> <p>The additional housing facilitated by the draft Plan is identified in the City's Housing Strategy as an important factor in catering for the needs of the existing residents of the City, and orderly growth.</p>	<p>Comments of support noted.</p>
19	<p>Support - The proposal will make the area safer from a bushfire perspective by connecting up existing long dead end roads and providing alternative points of egress in the event of bushfire.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Bushfire-appropriate design</li> </ul> <p>Please refer to body of the report for detailed discussion regarding designing for bushfire.</p>	<p>Comments of support noted. The future road network indeed reduces dead-ends, enables alternative egress to better manage bush fire evacuation risks.</p>
20	<p>Object - At present, traffic management in the surrounding area is inadequate, and there are frequent accidents along Hale Road and the Welshpool Road/Lewis Road intersection. Increasing industrial activity will place additional strain on already unsafe and congested roads. Until Main Roads implements appropriate upgrades to improve traffic flow and ensure community safety, I cannot support any development that would further increase vehicle volume.</p> <p>In addition to these safety concerns, the proposal is incompatible with the current rural character of the area.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic Impact</li> <li>- Character impact</li> <li>- Environmental Impact</li> </ul>	<p>The Hale Road and Welshpool Road/Lewis Road intersection traffic matters are recognised as existing issues for Main Roads WA and the City of Kalamunda, irrespective of the proposed development of Wattle Grove South. These matters raised will need to be resolved by Main</p>

	<p>Clearing significant vegetation would diminish local biodiversity, harm the natural landscape, and permanently change the amenity of the community. The removal of trees and the loss of rural space would be deeply disappointing and is not in the long-term interests of residents.</p> <p>For these reasons, I am unable to support this proposal in its current form.</p>	<p>Please refer to body of the report for detailed discussion regarding these impacts – which are noted by the Administration as core considerations of designing local structure plans.</p>	<p>Roads WA as part of its planned upgrades to the Crystal Brook Road and Tonkin Highway intersection grade separation solution. In the longer term, Welshpool Road East/Lewis Road intersection is projected to exceed practical capacity as a result of background traffic growth and traffic generated by the structure plan. Traffic signals and roundabout layouts have been tested, and a roundabout layout is likely to be the preferred option for this intersection in the future.</p> <p>The structure plan is informed by the Tree Retention and Canopy Strategy which seeks to provide ecological linkages through the development to open spaces and conservation areas via retained and planted green corridors, consolidating the urban tree canopy coverage. The Environmental Conditions for the MRS amendment will require the preparation of Tree Canopy Retention and Landscape Management Plan/s prior to subdivision or development to ensure trees are retained (where practicable) or replaced to provide connectivity between public open space and the proposed conservation areas.</p>
21	<p>Object - I object to the Wattle Grove South Structure Plan and I request my feedback and opinion be noted.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> </ul> <p>As requested the Administration notes the objection.</p>	<p>Comment noted.</p>
22	<p>Object - I do not support this project primarily due to environmental concerns. The proposed development threatens the aquifer and wetlands, potentially leading to habitat loss for native wildlife.</p> <p>Furthermore, I believe that small block development contradicts the existing community's character. The unique rural zoning has preserved the area's charm, and a scorched earth approach would be detrimental to the residents who enjoy the current state of affairs and the preservation of this environment.</p> <p>Additionally, I am appalled by the way in which large developers can enter an area and disregard its value, disregarding the impact on the environment and the well-being of the community.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Environmental impact (wetland)</li> <li>- Character impact (small blocks)</li> <li>- Developers priorities</li> <li>-</li> </ul> <p>Please refer to the body of the report for detailed discussion regarding the environmental and character impact of the draft Plan.</p> <p>It is common for large developers to progress changes to the planning framework; however the final decisions for scheme amendments, structure plans, and subdivisions are all made at the state level.</p>	<p>Whilst the structure plan area contains limited wetland values, no direct impacts are proposed to the adjacent conservation category wetlands located north of boundary road, and the adjacent Greater Brixton Street Wetlands located west of Tonkin Highway. The Local Water Management Strategy and future Urban Water Management Plan/s (which are required by the Environmental Conditions) will be prepared and implemented to ensure there are no adverse impacts to the Greater Brixton Street Wetlands, including impacts to the wetland's persistency, hydrological regime, water quality, ecological integrity and ecological function. Please refer to previous response regarding the protection, conservation and management of significant fauna values.</p>
23	<p>Comment only - I have no issues with the new development, however the amount of traffic that will be entering the new development will be in addition to the traffic that already comes and down up the hill along Welshpool Rd East each day.</p> <p>Whilst I can see the the addition of the four entry roundabout at Welshpool Rd and Brentwood Rd has been</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Traffic Impact</li> <li>- Lewis and Welshpool Intersection</li> </ul>	<p>The Welshpool Road/Lewis Road intersection traffic matters are recognised as existing issues for Main Roads WA and the City of Kalamunda, irrespective of the proposed development of</p>

	<p>planned and should suffice, I believe a condition of placing such a large new community at the base of the hill should also be a roundabout or a set of lights at the intersection of Lewis Rd and Welshpool Rd East to let the traffic pass through that area and not create a bottle neck at the base of the hill for the through traffic. Hardly a week goes by with out a serious accident there. There is only one road with two lanes up and down the hill, there are already bottle necks and heavily queuing traffic every morning. Locals will be not be happy if an entire suburb of new traffic causes congestion banking back to Lewis Rd every morning.</p>	<p>Please refer to body of the report for detailed discussion regarding traffic impacts.</p>	<p>Wattle Grove South. While the TIA did explore potential mitigation options for this roundabout, these matters will need to be resolved by Main Roads WA and the City of Kalamunda as part of its planned upgrades to the Crystal Brook Road and Tonkin Highway intersection grade separation solution. It is noted that based on the crash history, that this intersection would quality for both federal and WA state government Blackspot funding to mitigate the number of crashes occurring at this intersection.</p>
24	<p>Object - I object to the Wattle Grove South Structure Plan.</p> <p>The Wattle Grove South Structure Plan is really disgusting. You go against the community wishes and look like cheats and are cheats.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Cheating</li> </ul> <p>The Applicant has followed the regulatory framework in seeking approval of the draft Plan. Likewise the Administration has statutory responsibilities to process, advertise, and assess the draft Plan before the Local Government Report is provided to the WAPC for consideration.</p>	<p>(No comment provided by Applicant)</p>
25	<p>Object - 1) The conceptual plan which was provided some years ago for comment noted a variety of block sizes from one hectare lots to standard suburban lots. The structural plan is leading down the path of full suburban lots.</p> <p>2) The school location would better be suited elsewhere to avoid a] bushfires b] prevent light and noise pollution for native fauna resident in the reserve c] A school will attract a lot of vehicular traffic. The intersection of Crystal Brook road and Welshpool road is already congested at peak hours. A higher density population will make a bad situation worse.</p> <p>3) A reasonable amount of public/communal spaces around the reserve would be beneficial</p> <p>4) Some current landholders have endeavoured to plant copious numbers of trees. If this structural plan proceeds in any form it would be good to see these trees redistributed for residents to further nurture.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Design concerns</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding design and layout of the draft Plan.</p>	<p>The Structure Plan facilitates future urban (residential) development that is consistent with the strategic intent and vision for 'Urban Landscape' area under the Crystal Brook Concept Plan. The Crystal Brook Concept Plan provided broad overarching development principles and implementation strategies similar to a District Structure Plan and therefore acts as a guide for the Structure Plan. The Crystal Brook Concept Plan referred to its low density rural residential as a concept with no statutory weight. The low density was not financially feasible to implement. However, the plan integrated the environmental principals of the strategy - tree retention, protection of environmental features, and water management, which have been embraced by this structure plan. Management measures to appropriately control and minimise the impacts of increased noise and light emissions and human presence, both during the development and post development phases, can be addressed through the Construction Environmental Management Plan which will be implemented as a condition of subdivision throughout the construction phase of each stage of the development. The preparation and implementation of the Construction Area Management Plan during the development and post development phase will minimise the</p>

			potential impacts of increased human activities within the proposed conservation area.
26	<p>Object - As a land owner, resident and rate payer, I strongly object to the Wattle Grove South Structure Plan.</p> <p>I also strongly object to the apparent disregard on the Council's behalf in ignoring the overwhelming rejection to these plans by the great majority of the residents over the past 7 years. The democratic process and basic mandate of council appears in tatters along with the trust of the residents you are supposed to represent.</p> <p>I do hope legal recourse will not be necessary.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Threat of legal action</li> </ul> <p>The Applicant has followed the regulatory framework in seeking approval of the draft Plan. Likewise the Administration has statutory responsibilities to process, advertise, and assess the draft Plan before the Local Government Report is provided to the WAPC for consideration.</p>	<p>Strategic planning for the area has been progressing for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore the logical next step for the ongoing planning for this particular area.</p>
27	<p>Support - We feel that proposed School should be included in development with Precinct B NOT in Precinct C as shown in Structure Plan.</p> <p>Land allocated for public open space along Tonkin Highway should all be public open space with no development within that area. Currently the structure plan shows proposed Light Industrial and Open Air Display to part of this land.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Design modification</li> <li>- School site relocation</li> <li>- Light Industrial and Open Air Display replaced by public open space.</li> </ul> <p>Please refer to body of the report for detailed discussion regarding design and layout of the draft Plan.</p>	<p>Comments of support noted. The primary school has been placed centrally within the structure plan area, in accordance with the Department of Education's policy requirements, to enable balanced accessibility for families residing in Wattle Grove South. Whilst a portion of Precinct B is shown for Light Industry, there will still be a public open space linkage through the area.</p>
28	<p>Support - I support the development of Wattle Grove South.</p> <p>I would like more information regarding the expected time frame, block size range, prices, etc.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul> <p>Timing or future subdivision is not known – and given the draft Plan is yet to considered for determination – would be premature.</p>	<p>Comments of support noted.</p>
29	<p>Object - I wish to formally express my strong opposition to the Wattle Grove Structural Plan. My primary concern is that the proposed plan designates a school site directly on my property. This is an unacceptable outcome that creates serious personal, financial, and practical implications for me as the landowner.</p> <p>How does this impact or right to subdivide to smaller lots should we choose too ?</p> <p>At no point was I adequately consulted about the possibility of a school being placed on my land. The lack of communication and transparency throughout this process has left me without a meaningful opportunity to provide input or to understand the rationale behind this decision. The proposal disregards my rights as a property owner and undermines the security and future use of my land.</p> <p>The impacts would be substantial, including forced displacement, disruption to my daily life, and potential financial burdens associated with relocation or land acquisition negotiations. Moreover, the plan appears to have overlooked alternative locations that would avoid such severe consequences for existing residents.</p> <p>I urge the planning authorities to reconsider this aspect of the Wattle Grove Structural Plan. The school site must be relocated to a more appropriate area that does not impose such significant harm on private landholders. It is essential that the revised plan respects property rights, reflects genuine community consultation, and avoids</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Design modifications</li> <li>- School site relocation</li> </ul> <p>Please refer to body of the report for detailed discussion regarding design and layout of the draft Plan.</p>	<p>Comments noted. The proposed school site was selected based the state government's policy requirements. The Department of Education's policy requires a 4.25 hectare site within Wattle Grove South. The school site is required to be located conveniently to the future neighbourhoods of the Structure Plan and is to be central to the wider Wattle Grove South which it will serve. Cash contributions collected by the Department of Education are to be used to appropriately compensate landowners affected. The Department of Education will be able to advise further regarding the estimated timeframe to implement the school, and financial compensation for your property. The query regarding the rooster shall be addressed by the City of Kalamunda.</p>

	<p>unnecessary hardship for those directly affected. There is plenty of vacant land with no homes on them which would be a more suitable location.</p> <p>Until these issues are addressed and the school designation is removed from my property and that of my neighbours, I cannot and will not support the Wattle Grove Structural Plan.</p> <p>I also have a rooster, how does the rezone affect my ownership of a rooster?</p>		
30	<p>Support - We would like to be able to subdivide our 2.5 acre property, which currently has 1 dwelling on it. This matter of subdivision has been dragging on for at least 10 years now , time to move forward</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul>	<p>Support noted. The query regarding subdivision potential of your property is a matter for the City to advise on.</p>
31	<p>Object - We refer to the proposed plan and strongly oppose the structure plan you have submitted.</p> <p>We know there is minimal support from the Wattle Grove South community for this plan and would be perplexed if the majority were ignored.</p> <p>We are in no doubt that changing our area from rural will impact our rescue charity and put at risk, our future. We are certain our 580 supporters will agree with our position on this proposal to keep our area rural.</p> <p>Please keep Wattle Grove South zoned rural and protect its environmental values.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Existing use impact.</li> </ul> <p>Going through the local structure plan process which involves community consultation will provide insight for Council to consider when it makes a recommendation on the Local Government Report.</p> <p>The Administration notes concerns regarding businesses. In the event of zoning changes all approved activities can continue under the planning principle of 'non-conforming use rights' however these typically permit continuation, but not expansion.</p> <p>Please refer to body of the report for detailed discussion regarding existing businesses, and future businesses.</p>	<p>The Wattle Grove South Structure Plan provides the opportunity for landowners to divest or develop their land. Landowners can continue to use their land in accordance with existing approvals. They are not obliged to relocate. This Structure Plan therefore provides a key step to unlock the potential of your land, providing you with options now or in the future to pursue the subdivision of the land (subject to a separate application to the Western Australian Planning Commission). Please refer to previous response regarding the protection of significant vegetation, flora and fauna values in the proposed conservation areas.</p>
32	<p>Object - Destruction of the land. Do we not like to live with beautiful trees, animals and birds. When will the need to pull down trees just to replace with a tree? We are destroying our little bit of paradise in the hills. Tomkin intersection with welshpool is so very busy already. Used as a rat run from Kalamunda, Lesmurdie and Forrestfield. Car crash every week on welshpool and lewis road.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Environmental impact</li> <li>- Traffic Impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding environmental and traffic impact.</p>	<p>Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. Matters of traffic management have been addressed by the Traffic Impact Assessment which was included in the structure plan.</p>
33	<p>We are writing in response to your letter to us as landowners with Ref: PG-Dev-067 Wattle Grove South dated 23<sup>rd</sup> October 2025, which we received a week later.</p> <p>That letter states and to quote,</p> <p><i>The City of Kalamunda's role is to:</i></p> <p><i>Inform and involve affected nearby residents and landowners</i></p> <p><i>Collate feedback on the proposal and submit to Council</i></p> <p><i>Council will then provide a recommendation to WAPC.</i></p> <p>Neighbourhood chats though, suggest that not <b>all</b> affected nearby residents were informed. <b>All</b> residents and landowners in and around the area and nearby vicinity, will be affected and impacted upon.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Environmental impact</li> <li>- Character impact</li> </ul> <p>The Applicant has followed the regulatory framework in seeking approval of the draft Plan. Likewise the Administration has statutory responsibilities to process,</p>	<p>The Structure Plan facilitates future urban (residential) development that is consistent with the strategic intent and vision for 'Urban Landscape' area under the Crystal Brook Concept Plan. The Urban Landscape area represents land affected environmental and servicing constraints which, at a high level assessment, do not impede development so long as the strategic objectives of the concept plan are met and sensitive interface</p>

<p>We have also as suggested, studied the Proposed Structure Plan for Wattle Grove South in the Document Library on the City's Engage page.</p> <p>As residents and ratepayers of CoK, we oppose the Proposed Structure plan as it presently stands. We have responded to numerous surveys and submitted submissions expressing our concern regarding dense urban development of this environmentally sensitive area. The Wattle Grove South community has already rejected this urban development concept quite resoundedly. We recall <b>145</b> written submissions opposed to it and <b>only 2</b> written submissions in support. It would be interesting to know the results of the survey of July this year, 2025, to which we are not privy as yet. No doubt results would reflect very similarly as all previous surveys and consultations. Maybe an addition to the City of Kalamunda's role above could be <i>'To be open and transparent'</i> For us, nothing has changed — we continue to oppose the dense urbanisation proposal of Wattle Grove South. Now we have this new title 'Proposed Structure Plan for Wattle Grove South'</p> <p>How can this be when the land is still subject to a live EPA Environmental Review (ER)? This means the majority have not been listened to.</p> <p>We here at [residential address redacted], as no doubt you are very aware, are 'Piggy in the Middle' with properties either side of us committed to the developer, Hesperia.</p> <p>Word on the street last week was that Development will begin on property adjoining us in March 2026.</p> <p>Word on the street this week came with the acknowledgement that a property owner further up the street, who has committed a portion of his land to the developers, had council permission for the building of large sheds expediated through help and influence of the developers.</p> <p>On Friday 14<sup>th</sup> November a surveyor was in Victoria Rd moving on and around various properties.</p> <p>All this tells us that the deed has already been done despite the worries and concerns of landowners opposed to dense urban development.</p> <p>We ask the question again:</p> <p>How can all this be occurring when the land maintains its rural/semi-rural status and is subject to a live EPA Environmental Review (ER)?</p> <p>To many landowners opposed to this development the above actions and others that have been occurring such as arborists marking trees etc, tell us that all departments from State Government level to Local Government and Developers are all in <i>cahoots</i> together. Purporting to be open and transparent but not really at all. Not listening to the people, not listening to the majority.</p> <p>What has happened to Democracy?</p> <p>To state our position again, we oppose dense urban development of this environmentally and culturally sensitive area, with its natural tree canopy and home and sanctuary to much bird and animal life, including threatened species such as red tailed and white-tailed cockatoos and bandicoots.</p> <p>Such dense urbanisation will destroy the aesthetics of this environmentally, peaceful area at the base of the 'Forest in the Hills.'</p> <p>We respectfully request the City of Kalamunda to seriously review this Proposed Wattle Grove Structure Plan, which endorses intense housing on small sized blocks. Let's work at maintaining the rural/semi-rural amenity and green belt at the foot of the hills.</p>	<p>advertise, and assess the draft Plan before the Local Government Report is provided to the WAPC for consideration.</p> <p>The Administration is aware that multiple land transactions have occurred with development-minded owners – such as the Applicant for this draft Plan.</p> <p>Please refer to body of the report for detailed discussion regarding the broad outcomes of community consultation, and discussion of impacts on the areas character and environment.</p>	<p>treatments are provided between land use typologies. The Structure Plan makes provision for a range of residential densities, and shall also accommodate existing homestead lots. A Residential Density Code Plan will be prepared at the subdivision stage. There are ongoing site surveys being undertaken by professional arborists and surveyors to spatially locate trees to ensure future subdivision designs accommodate tree canopies and tree root protection zones. This finer level of detail is important to undertake to ensure best practices are undertaken by the design team when implementation is undertaken post approval of the structure plan and MRS rezoning. Please refer to previous response regarding EPA assessment and recommendations to the Minister for Environment, and planning processes and approvals to follow regarding the MRS amendment and the structure plan. Please refer to previous responses regarding the protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. The Wattle Grove South project aims to create a community, where the new built form is integrated into the existing landscape, replacing former turf farms, rural land uses, and rural industrial areas. In its place, new homes, parklands and conservation areas shall be interconnected with tree lined avenues, local amenities and a new primary school forming the heart of the community. The design and implementation approach of the Structure Plan is led heavily by the Landscape Master Plan. The Landscape Master Plan is predicated around retaining as much 'landscape-led' ecological benefit within the site as possible. Tree retention and canopy tree planting is an ongoing commitment that shall occur between a proponent and the City of Kalamunda during each stage of development of the relevant Planning Precinct. Proactive preparation during the detailed design of subdivision layouts for each of the Planning Precincts is necessary to achieve the best practice outcomes sought by the City of Kalamunda's Urban Forest Strategy.</p>
<p>We oppose the Proposed Structure Plan as presented. High density housing on very small blocks is not appropriate for society nor for this environmentally, culturally sensitive and biodiverse area. Home and sanctuary to endangered animal and bird life. The tree canopy is invaluable to animals and humans alike. 'Trees the lungs of the earth.' Mature trees once destroyed can never be replaced.</p> <p>We implore the City of Kalamunda to give us and many other WGS residents confidence, by acting responsibly when making decisions with regard to Developers' ideals and protecting this beautiful, peaceful area at the base of the hills. At the base of the 'Home in the Forest.'</p>		

	<p>We are emailing to reiterate our concerns and opposition as per previous correspondence, re the Proposed Structure Plan Wattle Grove.</p> <p>South. R40 zoning is not appropriate for this environmentally and culturally sensitive area, which is home to and sanctuary to much bird and animal life, including threatened species like red tailed and white-tailed cockatoos and bandicoots.</p> <p>As stated in previous correspondence, such dense urbanisation will destroy the aesthetics of this beautiful green belt at the base of the 'Forest in the Hills.'</p> <p>We respectfully request the decision makers at the City of Kalamunda to review this Proposed Wattle Grove Structure Plan, which endorses dense housing on small sized blocks. House upon house and another sea of roofs. Let's work at maintaining the semi-rural amenity and green belt at the foot of the hills.</p>		
34	<p>Object - Totally against this development. I am so disappointed in the council supporting the developed initiated structure plan.</p> <p>Council knows the majority of residents in this area are against development. Council has done an environmental study of this area a few years back and know there is rare and near extinct flora and wildlife in this area. We have the very rare black cockatoos nesting and feeding in this area. We need to protect our environment and stop destroying our tree canopy and wildlife.</p> <hr/> <p>Afternoon</p> <p>I totally DO NOT support this plan.</p> <p>For so many reasons</p> <ul style="list-style-type: none"> <li>* environment.. saving tree canopy, protecting wildlife, endangered black cockatoo feeding and breeding area. Brixton wetlands.</li> <li>* lifestyle..we live in this area for a peaceful lifestyle for our family and love of the bush and native animals we want it left as rural.</li> <li>* why are we even completing a structure plan as this is led by a developer whilst this is zoned rural..this is a definite push by a developer and a council wanting more rates as there is no reason for this plan to be even conducted when the residents have not pushed for this or asked for it.</li> <li>* noise from the new airport runway.. the airport authorities are against development in wattle grove as the noise level is not good for high development.</li> <li>* there is an active EPA in this area why are you seriously looking at high density development in an environmentally sensitive area with a EPA going..is this even legal!</li> <li>* the amount of stress this council puts on Wattle Grove South for over 10-15 years the constant push to develop this area were over 90% of the residents want you to leave the area as it it's..the mental exhaustion you are supposed to represent the residents it is a constant pressure from council.STOP and leave this area as rural.</li> </ul>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Environmental impact</li> <li>- Character impact</li> <li>- Amenity impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the legitimacy of the draft Plan, the broad outcomes of community consultation, and discussion of impacts on the areas character and environment.</p>	<p>Following formal assessment of the Metropolitan Region Scheme Amendment 1388/57 under Part IV of the Environmental Protection Act 1986, the Environmental Protection Authority (EPA) concluded that the amendment may be implemented, subject to a suite of Environmental Conditions being implemented to protect the site's key environmental values, as well as the Greater Brixton Street Wetlands which is in proximity of the project area. The Wattle Grove South Structure Plan has been designed to meet the requirements of the Environmental Conditions for the Metropolitan Region Scheme Amendment Report 1388/57 and align with the EPA's objectives and mitigation hierarchy. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. Please refer to previous response regarding the management of indirect impacts to the Greater Brixton Street Wetlands to ensure no adverse impacts to the wetland's persistency, hydrological regime, water quality, ecological integrity and ecological function. This locality has the potential to create a high quality and distinctive community that has, as its foundations, the qualities of the semi-rural, foothills character that has been created by its mature vegetation. The development of a new urban landscape that reflects the landscape qualities and characteristics of this area requires a planning and design approach that focuses on tree retention wherever practical within the public realm and public open spaces at every stage of the development process. The Landscape Master Plan prepared as part of the structure plan recognises that sustainable communities are places that</p>

			people like living in and want to stay in, neighbourhoods with real character and sense of place. These successful places should have well-designed green spaces that people will want to use and respect. The Structure Plan area is located outside of the Perth Airport ANEF 20 contours. A portion of the Structure Plan is however affected by the N65 and N60 noise contours. This does not prevent the development of the site for residential purposes.
35	<p>Object - The residents in wattle Grove South is absolutely disgusted and frustrated with this council and its constant push to develop this area against the very residents they are supposed to be representing. For years we have been put through so much stress by the council relentless push for rate revenue by developing wattle grove..STOP!!!!</p> <p>We want to keep this beautiful environmentally area rural.. we have nurtured our trees and bird life..we love our lifestyle and take care and respect the environment we live in..I say no to this development 100%</p> <p>-----</p> <p>I DO NOT SUPPORT THIS PLAN</p> <p>This is not legal as we have not completed the EPA study and the zoning is rural.</p> <p>Protect the tree canopy, the rare fauna and flora as per your own council report you conducted a few years ago!!</p> <p>Leave this area alone.. this what the residents want.. no one asked for this plan except one developer.. represent your residents!!!!</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Environmental impact</li> <li>- Character impact</li> <li>- Lifestyle impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the legitimacy of the draft Plan, the broad outcomes of community consultation, and discussion of impacts on the areas character and environment.</p>	Please refer to the response provided above under item 34.
36	Object – no comments	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> </ul>	(No comment provided by Applicant)
37	<p>Object - Concerns about traffic volume on Crystal Brook Rd and having 2 entrance roads into primary school directly across the road from our driveway. Speed limits and traffic control measures will need to be considered. What are the longer term plans for residents on the north side of crystal brook?</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impacts</li> </ul> <p>Please refer to body of the report for detailed discussion regarding traffic impacts.</p> <p>The WAPC's North-East Sub Regional Framework identifies the land on the generally north side of Crystal Brook Road – up to Welshpool Road East for urban expansion, urban investigation, and rural. The mix suggests that a long-term transition is possible, subject to changes in the planning framework – similar to what the Applicant has progressed in this area.</p>	Comments noted. A Transport Impact Assessment was undertaken to ensure the proposed road network and design is compliant with Australian Standards. Speed limits and traffic control measures will indeed be scrutinised by the traffic officers to ensure a safe road network is achieved for the community. This structure plan does not contemplate the future development of land to the north of Crystal Brook Road, as it applies only to the area being rezoned by the WAPC to Urban under the Metropolitan Region Scheme.
38	<p>Object - Although I am not against development in the area, the reason a lot of people love living in Wattle Grove is the urban-rural feel, being able to live near/with the bush, and having a local community. Continued development of the area including this space which is currently home to wildlife including black cockatoos (which have nowhere else to go now that almost all of WG has been developed) is honestly becoming ridiculous.</p> <p>There has to be a balancing act between nature, and development. All of the area along Welshpool road is now</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> <li>- Environmental impact</li> <li>- Character impact</li> <li>- Lifestyle impact</li> </ul>	The Wattle Grove South Structure Plan has been designed to meet the requirements of the Environmental Conditions for the Metropolitan Region Scheme Amendment Report 1388/57 – Wattle Grove South. Through avoidance, minimisation, rehabilitation, and adaptive

	<p>industrial, and a new estate is still being built near Bruce Road/the Jehovah's witness church. How many more houses can we cram in, and where is our wildlife going to go? Getting in and out of WG during peak hour is a NIGHTMARE - try getting from Welshpool Road east onto or across Tonkin Highway from 3pm onwards - and you want to allow yet another estate in? The existing infrastructure cannot support it, and we will lost what makes our suburb so amazing.</p>	<p>Please refer to body of the report for detailed discussion of the impacts of the draft Plan.</p>	<p>management, the proposal considers: – Protection and management of conservation of Threatened Ecological Communities and significant flora and fauna within Conservation areas through the Conservation Area Management Strategy (CAMS), which will guide future Conservation Area Management Plans (CAMPs) for each Conservation Area. – Tree canopy retention (including black cockatoo potential nesting trees) within the urban development through the Tree Canopy Retention and Landscaping Management Plan (TCRLMP). – Maintenance of hydrological regimes and likely improvement in water quality via the Local Water Management Strategy, which will guide future Urban Water Management Plans (UWMPs). – Preservation of cultural heritage and visual amenity. – Sustainable urban development which minimises its environmental impact within the site and the nearby Greater Brixton Street Wetlands. The Structure Plan's Traffic Impact Assessment recommends to the City of Kalamunda and Main Roads WA that the Welshpool Road East / Crystal Brook Road / Brentwood Road intersection be upgraded to a four-way roundabout configuration to accommodate the project traffic volumes in the full build-out year 2040 scenario.</p>
<p>39</p>	<p>Comment only - I dont really have a view of the development in itself however, before any further housing developments are done in the city that are on the Eastern Side of Tonkin highway, major road infrastructure needs to be put into place.</p> <p>The get across Tonkin Hwy on Welshpool Road or down Hale Road onto Tonkin from Forrestfield it takes 15 minutes and multiple sets of light changes.</p> <p>This development and future developments will put more pressure on an already dysfunctional traffic plan that needs urgent upgrades before the City should consider any further housing.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding traffic impacts of the draft Plan.</p>	<p>Comments noted. There are proposed upgrades to the Tonkin Highway and Welshpool Road intersection by Main Roads WA which should improve traffic movement in this locality. The timing and implementation of these initiatives are being undertaken by Main Roads WA, not the proponents of this structure plan for Wattle Grove South.</p>
<p>40</p>	<p>Do not support - Firstly, I agree and stand with Precinct A Group. I don't believe Precinct A is suitable for Residential as the area is currently Rural Composite and is used as such. The proposed School Site should be towards the Corner of Precinct C near Crystal Brook Road for a more centralized capture point for future</p> <p>The Road Systems only work using land the developer doesn't own yet and may never own. Majority of Public Open Space is on Unowned by developer land.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Precinct A being different</li> <li>- School location</li> <li>- Location of road reserves and Open Space</li> </ul> <p>The Administration notes that Precinct A does have some unique characteristics and existing land uses which make suggestions of more of a commercial focus worth exploring.</p> <p>However, the City's non-statutory Crystal Brook Concept Plan and engagement with landowners within the precinct indicated that there was a preference to retain</p>	<p>Comments regarding Precinct A are noted. It is recognised that the landowners and business operators may wish to pursue alternative land uses than residential within Precinct A. This can be considered as part of future modifications to the structure plan. The primary school has been placed centrally within the structure plan area, in accordance with the Department of Education's policy requirements, to enable balanced accessibility for families residing in Wattle Grove South.</p>

		<p>the existing landscape, character, amenity – and facilitate a residential outcome. Commercial and industrial development typically takes a much higher toll on the environment, and a greater impact on the amenity and character of an area than residential development.</p> <p>The Administration is required to assess the draft Plan as it has been submitted – and it is completely residential. Landowners within the Structure Plan area do have the ability to seek amendment to a Structure Plan once it is adopted.</p>	
41	<p>Object - I wish to lodge my OPPOSITION to the purported Wattle Grove South Structure Plan (WGSSP).</p> <p>I object to this development application for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The increase in traffic movements on Gavour Road and Welshpool Road East. There have been many accidents on Welshpool Road East and Crystal Brook road. Increasing traffic movements and access onto these roads poses increased risk to safety and congestion.</li> <li>2. For 20 years the Shire has been maintaining the need for aged care in the Shire, but this development will only provide a lifestyle village and no aged care. The result of which negatively impacts on current residents and does not progress aged care which the Shire constantly argued was so desperately needed and the reason for allowing this development on Lot 500. There is no guarantee that aged care will be delivered.</li> <li>3. The land is zoned Special Rural. The development is an urban use and inconsistent with the surrounding zoning and land use.</li> </ol>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> <li>- Aged Care</li> </ul> <p>This submission appears to be in error and instead relates to a development application outside the draft Plan area.</p> <p>For the avoidance of doubt, please refer to body of the report for detailed discussion regarding the traffic impact of the draft Plan, and consistency with the City's Housing Strategy – which deals with aged care needs within the City.</p>	<p>A Transport Impact Assessment was undertaken to ensure the proposed road network and design is compliant with Australian Standards. No aged care development is planned for this area, however it is not precluded should a proponent wish to consider establishing facilities. The structure plan area is subject to a rezoning proposal through the WAPC which shall rezone it to Urban.</p>
42	<p>Object - I thoroughly support the objection to the proposal of the (WGSSP) by Ecovision and the residents of Wattle Grove South.</p> <p>From a transport view ,the bus service is severely limited to 283 to and from Kalamunda to the city.</p> <p>Crystal Brook Rd is already heavily used as access to Welshpool Rd which then may take you 7 light changes to get across Tonkin Hiway .</p> <p>Coming back from Perth you have people avoiding the right hand turn to Armadale and using U turns to get around causing chaos to the right hand lane which you then have a disastrously short slip lane to turn right into Crystal Brook Rd with people speeding up on the bend to go further up Welshpool Rd.</p> <p>Until the intersection of Tonkin Hiway and Welshpool Rd is upgraded with an overpass you cannot possibly put another 5000 people into the area .</p> <p>#Item 4 Social and Amenity Impacts of Ecovision Objection</p> <p>The inclusion of a Primary school with traffic in and out of Crystal Brook Rd would be further assault on a suburban Road and dangerous to local residents and the possibility of another set of residents to the proposed Lifestyle village in Gavour Rd ,which does not meet the brief of previous proposals .</p> <p>The (WGSSP) states that land owners have the right to NOT sell their properties so why consider a proposal by private developers who have no regard for the Rural Lifestyle and character of the Area .</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> <li>- Environmental impact</li> <li>- Character impact</li> <li>- Lifestyle impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these core planning considerations.</p>	<p>With the delivery of Wattle Grove South, there is an opportunity expand upon Route 283, providing a new route, to operate through the site. Ongoing liaison will be carried out with the Public Transport Authority (PTA) to identify and formalise potential bus route alignments. A Transport Impact Assessment (TIA) for the Wattle Grove South Structure Plan prepared by PTG determined that a roundabout would be required at the Crystal Brook Road intersection under the full build-out of scenario to cater for both background traffic growth and traffic generated by the Structure Plan. The TIA report provides an analysis of expected daily traffic volumes on the internal road network. It indicates that all internal roads are projected to carry traffic volumes within the thresholds specified in Liveable Neighbourhoods. Strategic planning for the area has been progressed for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure</p>

	I look forward to The Shire of Kalamunda to listen to the residents of Wattle Grove South and not destroy the land we live on with Black Cockatoos flying around as I type.		plan is therefore consistent with the ongoing planning for this particular area.
43	Object - Do not support!!! Nobody is happy about this.	The Administration notes the submission and theme of - Objection	(No comment provided by Applicant)
44	Object - I DO NOT SUPPORT THIS PLAN  As a young adult I am so aware of what damage our so call older government representatives has done to the world and the damaged climate change will have for me and my future children. This area is an environmentally sensitive area and once you destroy this area you will never get it back. I want my future children to have a world where the environment is valued. We need to value the tree canopy and the wildlife that lives in this area. Stop trying to develop everything and destroy everything. How about we say no to developers and respect what we have!!! Do the right thing council and represent the residents in this area and do the right thing for the environment and prevent climate change..	The Administration notes the submission and theme of - Objection - Environmental impact  Please refer to body of the report for detailed discussion regarding the environmental impact of the draft Plan.	Thank you for outlining your concerns. We have designed the Structure Plan to avoid and manage environmental impacts, stage infrastructure upgrades, and provide choice for landowners. The Structure Plan embeds Conservation Areas, potential conservation investigation areas, and a Tree Canopy Retention & Landscaping Management Strategy. UWMPs will maintain hydrology and improve water quality (deep sewer implementation and removal of turf farm; resulting in reduced nutrients compared to the current status).
45	Object – no comments	The Administration notes the submission and theme of - Objection	(No comment provided by Applicant)
46	Object Executive Summary [redacted], representing more than 200 residents of Wattle Grove South and surrounding areas, strongly objects to the purported Wattle Grove South Structure Plan (WGSSP). The proposal is premature, lacks lawful foundation, and is incapable of having statutory effect. It seeks to facilitate urban development on land that remains zoned Rural under both the Metropolitan Region Scheme (MRS) and the City of Kalamunda Local Planning Scheme No. 3 (LPS 3). Crucially, the Metropolitan Region Scheme Amendment 1388/57 has not been approved or gazetted; the WAPC has not authorised the preparation or advertising of any structure plan; and the proposal area remains subject to a live EPA assessment. Proper planning sequence requires rezoning and environmental approval before any structure plan. The WGSSP reverses statutory logic. Further, new statutory purposes for the MRS Rural zone (Clause 22, inserted in 2024) confirm that urban land uses are fundamentally incompatible with the current zoning. A structure plan premised on urbanisation cannot be lawfully progressed while the MRS zoning prohibits such use.  1. Legal and Statutory Grounds 1.1 Prematurity and Lack of Legal Basis A structure plan cannot pre-empt rezoning. The lawful sequence in Western Australia is: Rezoning → Structure Plan → Subdivision → Development. At present, the land remains zoned Rural under both the MRS and LPS3. MRS Amendment 1388/57 has not been approved or gazetted, and no lawful basis exists for preparing or advertising the WGSSP. Most importantly, the WAPC has not made any decision directing or authorising the preparation of a structure plan for Wattle Grove South. A private proponent cannot compel an LGA to advertise a structure plan where the planning framework does not permit it.  1.2 MRS Clause 22 – Statutory Purposes of the Rural Zone Amendments to the MRS in 2024 introduced explicit statutory purposes for each zone. The Rural zone now has mandatory purposes limited to: (a) sustainable rural land use;	The Administration notes the submission and themes of - Objection - Procedural concerns - Inconsistency with planning framework - Amenity impact - Environmental impact  Please refer to body of the report for detailed discussion regarding these concerns and impacts.	Currently, the site does not contain any formalised stormwater management infrastructure or measures implemented for the treatment of water quality runoff or groundwater at the site (e.g., bio-retention areas). The Environmental Conditions requires future residential development to ensure no adverse impacts to Greater Brixton Street Wetland, including impacts to the wetland's persistency, hydrological regime, water quality, ecological integrity and ecological function. The implementation of 'best practice' stormwater management, which includes the installation of bio-retention swales and basins will result in improving the water quality and reducing the nutrient levels currently exported from the site. The comments made in this submission therefor overlooks the impacts from the historical and existing land uses in the wider Yule Brook catchment and its influence in terms of nutrient loading on the wetlands within the GBSW area. Regarding the submissions reference to the term "hydro-plain", this term is not a recognised hydrological or hydrogeological nomenclature and no scientific explanation or definition on the meaning is provided.. The LWMS demonstrates the extent to which spatial data and analysis has informed the LSP. It presents data and spatial figures based on detailed technical assessment across the following hydrological and hydrogeological elements: surface water catchment mapping and assessment, groundwater

<p>(b) conservation of natural resources; (c) providing a rural landscape setting; (d) carefully planned rural living; and (e) rural tourism consistent with rural character.</p> <p>Urban residential development is not a permitted or contemplated purpose of the MRS Rural zone. Any structure plan premised on intensive urbanisation is therefore inconsistent with the statutory purposes of the zone and cannot be progressed until rezoning is lawfully completed.</p> <p>1.3 EPA Act s.41 and s.41A Prohibition During Live Assessment The amendment area is under formal EPA assessment. Section 41A prohibits a decision-making authority from making or implementing any decision that could allow a proposal to be implemented while under assessment. Advertising or progressing the WGSSP advances the implementation of the urban proposal being assessed and therefore risks contravening s.41A. No authorisation for preliminary planning has been granted by the EPA.</p> <p>1.4 Orderly and Proper Planning Advancing a structure plan before the lawful completion of environmental assessment and rezoning contravenes the obligation to ensure orderly and proper planning under s.241 of the Planning and Development Act 2005. The WGSSP embeds assumptions of urbanisation that contradict existing planning instruments and the current lawful zoning.</p> <p>1.5 Landowner Rights and Procedural Fairness The WGSSP introduces mechanisms that imply coerced land aggregation and significant financial burdens on unwilling rural landowners. The City's communications failed to accurately describe the legal status of the plan, the zoning, the live EPA assessment, or the absence of WAPC authority. This has denied procedural fairness and misled affected owners regarding their rights.</p> <p>2. Planning and Policy Conflicts The WGSSP conflicts with numerous binding and guiding instruments including State Planning Policy 2.5 (Rural Planning), the City of Kalamunda Local Planning Strategy (2021), SPP 3.7 (Bushfire Planning), SPP 3.6 (Infrastructure Contributions), and the City's Urban Forest Strategy. The WGSSP assumes urbanisation where strategic documents repeatedly indicate rural protection pending environmental and strategic review.</p> <p>3. Environmental Grounds The WGSSP reverses proper environmental planning logic by assuming an urban outcome first and seeking to justify it retrospectively. The area supports mature Banksia, Marri, Jarrah and Corymbia-Kingia vegetation communities, threatened black cockatoo habitat, and critical ecological linkages. These were recognised in the independent AECOM report commissioned by the City.</p> <p>3.1 Hydrology and the Greater Brixton Street Wetlands UWA hydrological mapping demonstrates that the area lies within the hydroplain influencing the Greater Brixton Street Wetlands, a site of international scientific significance. Urbanisation poses high risks to hydrology, nutrient loading, groundwater lows, and wetland ecosystem integrity.</p> <p>4. Social and Amenity Impacts</p> <ul style="list-style-type: none"> <li>• Significant loss of rural character and lifestyle</li> <li>• Forced infrastructure and development cost burdens</li> <li>• Traffic increases from ~2,000 to over 10,000 vehicles/day on Crystal Brook Road</li> <li>• Loss of canopy and increased heat island effect</li> </ul>		<p>assessment, surface water monitoring, assessment of regional groundwater monitoring (including DWER regional bores and within the GBSWarea), local and regional geology, and geotechnical studies. The Environmental Protection Authority (EPA) has undertaken its assessment of impacts for MRS Amendment 1388/57 (EPA Report 1788), and advised the Minister for Environment that it had assessed the potential environmental impacts, considered the proposed management measures being able to mitigate these impacts and recommended that the amendment may be implemented, subject to the recommended environmental conditions. At the time of response, the Appeals Convenor is investigating appeals that were lodged against the EPA's report and preparing advice for the Minister for Environment to determine whether to uphold, dismiss or modify the EPA's recommendations. Should the Minister for Environment allow the MRS amendment to be implemented (subject to conditions) then the MRS Amendment will be implemented under the Planning and Development Act 2005, along with the proposed concurrent rezoning to Urban Development under the City of Kalamunda Local Planning Scheme 3 (LPS 3). The draft Environmental Conditions of MRS Amendment 1388/57 requires:</p> <ul style="list-style-type: none"> <li>• The retention and conservation of native vegetation containing threatened ecological communities, threatened flora, medium to high quality foraging habitat for black cockatoos</li> <li>• future urban development to avoid or minimise adverse impacts to the Greater Brixton Street Wetlands.</li> <li>• The Conservation Area Management Strategy which was prepared to support the Structure Plan provides a framework to facilitate future on ground management to protect, maintain and enhance the significant vegetation, flora and fauna within the proposed conservation areas as urban subdivision and development of the site progresses. In the context of the above environmental assessment and process with the EPA, the proposal has been thoroughly assessed to ensure state government experts are satisfied with the approach taken. The draft structure plan can still be progressed concurrently with the Metropolitan Region Scheme amendment. The parallel assessment of the structure plan with the MRS amendment provides a distinct benefit for agency assessors by providing another level of detail, resulting in a more informed proposal. The</li> </ul>
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	<p>• Community distress and erosion of trust</p> <p>5. Governance and Integrity Concerns Under s.2.10 of the Local Government Act 1995, councillors must act with care, diligence, integrity and in the public interest. Advancing a premature, unlawful, or misleading planning proposal exposes the City to findings of maladministration and undermines public confidence in planning processes. Indicators of perceived regulatory capture include advancement of an urbanisation agenda ahead of statutory preconditions, reliance on proponent-led assumptions, limited disclosure to landowners, and administrative actions suggesting inevitability despite unresolved environmental and statutory matters.</p> <p>6. Requested Actions [redacted] respectfully requests that Council resolve to:</p> <ol style="list-style-type: none"> <li>1. Decline to endorse or progress the WGSSP unless and until: <ul style="list-style-type: none"> <li>• The MRS rezoning is lawfully approved and gazetted; and</li> <li>• The EPA assessment is completed in accordance with s.41A; and</li> <li>• All affected landowners have been afforded proper procedural fairness.</li> </ul> </li> <li>2. Advise the WAPC formally that the WGSSP is premature and lacks statutory foundation.</li> <li>3. Suspend all expenditure and officer time associated with the WGSSP pending statutory compliance.</li> </ol> <p>Conclusion The purported WGSSP has no legal foundation, proceeds contrary to orderly and proper planning principles, contradicts the statutory purposes of the MRS Rural zone, and threatens high-value environmental and community assets. [redacted] urges Council to reject or suspend the WGSSP until all legal preconditions are satisfied.</p>		<p>structure plan is therefore deemed necessary for the purposes of orderly and proper planning. The Western Australian Planning Commission shall not determine the proposed structure plan until the abovementioned processes are completed.</p>
47	<p>Object - I do not support this development for the environmental impact it is going to have. Leave it as it is. The black cockatoos are already suffering enough.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Environmental impacts</li> </ul> <p>Please refer to body of the report for detailed discussion regarding managing the environmental impacts of the draft Plan.</p>	<p>Please refer to above comments in relation to environmental initiatives.</p>
48	<p>Object - Do not Support the development.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> </ul>	<p>(No comment provided by the Applicant)</p>
49	<p>Object - Looking at the zoning, the largest lot size is around 450sqm and smaller. Many people in the area are desperately looking for larger blocks 800 - 1000 sqm. Why can't larger blocks that support large families and intergenerational living be provided in developments in Wattle Grove instead of dog boxes? The size of the blocks on the other side of Tonkin Highway are a joke and have turned the area into poor, unmaintained looking suburb which you can not get out of in an emergency due to the traffic congestion caused by poor road planning.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> <li>- Preference for 800-1000m2 lots, not 450m2</li> </ul> <p>Please refer to body of the report for detailed discussion regarding traffic impacts and lot size considerations.</p>	<p>The Structure Plan provides flexibility for landowners to deliver a range of lot sizes. There is scope for landowners to provide lots larger than 500sqm should they decide to.</p>
50	<p>As a resident of [street name] in Wattle Grove I wish to formally lodge my opposition to development of our area. I have lived on [street name] since 2013 and have cannot imagine how urban development of the area is justified from an environmental perspective. The area supports threatened species of birds and mammals, includes valuable and unique fauna and is home to families who have chosen to live in an area with space, peace, connections to nature and community.</p> <p>I urge you to reject the development plans for Wattle Grove South.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul>	<p>Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas.</p>

		Please refer to body of the report for detailed discussion regarding amenity, and environmental impacts.	
51	<p>Object - I am writing to raise my concerns and objections regarding the proposal to rezone approximately 126 ha of the Wattle Grove foothills. This proposal would see rezoning under the Metropolitan Regional Planning Scheme (MRS) from its current rural zoning to an urban zoning that will allow for high-density residential development. Myself and my family currently enjoy our semi-rural lifestyle including the local fauna and wildlife that frequent our property and local area, some of which include but are not limited to the Red-Tailed Black Cockatoos, Quenda's and Western Grey Kangaroos.</p> <p>Reviewing the Wattle Grove South Structure Plan and the non WAPC approved MRS amendment 1388/57 for Wattle Grove South, I have serious concerns with the proposal and its processes to date. I have outlined some our concerns below;</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>The fact that the Western Australian Planning Commission (WAPC) has allowed a private developer (Hesperia Pty Ltd), who hold a vested financial interest in the approval of this rezoning amendment, to submit its own environmental assessment without arranging for an independent and unbiased environmental assessment report is beyond reprehensible and calls into question the integrity of the entire process.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>When you start looking further into this proposal you will find contradictions to the principles of community wellbeing, environmental conservation and good governance as depicted in the State Planning Framework's - State Planning Strategy 2050.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>Current planning frameworks along with the Department of Planning's own Urban Monitor Records show a substantial surplus in land currently allocated for urban development in Perth that could take up to 62 years to completely develop.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>The treatment of this proposal as a minor amendment when the proposed development scale of over 1,000 new dwellings, up from the 77 existing dwellings along with the substantial infrastructure requirements show that this amendment is anything but minor.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>The Urban Monitor 11 report stresses the serious environmental costs of urbanisation including the creation of urban heat islands, climate change impacts, accelerated loss of biodiversity and deterioration of air and water quality.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>The historical protection status of the Foothills rural land as outlined in the Foothills Structure Plan, has been protected since 1992 from more intensive development which includes the rural areas along the Welshpool Road East as confirmed by the Department of Planning, Lands and Heritage (DPLH) in 2019.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>A 2015 draft that initially preserved Wattle Grove South's rural status, aligning with both the MRS and Foothills Structure Plan, was altered at the then Shire of Kalamunda's request without community consultation. This raises serious procedural concerns when a community directly impacted by these proposed and significant changes are silenced and left out of the consultation process.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>The omission of critical policies from the amendment report, including the State Planning Policy 3.7 – Bushfire and the Planning for Bushfire Guidelines is irresponsible and reckless when the proposed amendment will lead to a significant increase in population and vehicle traffic. This will severely impact emergency evacuation and response times in an area where the sole evacuation route (Crystal Brook Road) is tree lined and vulnerable to blockage from fire and or fallen trees.</p> <ul style="list-style-type: none"> <li>•</li> </ul>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Concern of biased reports</li> <li>- Procedural concerns</li> <li>- Inconsistency with planning framework</li> <li>- Preference for rural lifestyle subdivision</li> <li>- Amenity impact</li> <li>- Environmental impact</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns.</p>	<p>Wattle Grove South has long been earmarked by the State Government for urban development. The area is identified within both the Western Australian Planning Commission (WAPC) Perth and Peel @3.5Million Sub-Regional Planning Framework (WAPC, 2018). The project will implement urban (primarily residential) development consistent with the site's designation for urban expansion under the framework and follows the Metropolitan Region Scheme 'Urban' rezoning proposal (MRS 1388/57). Please refer to previous response regarding EPA assessment and recommendations to Minister for Environment, and planning processes and approvals to follow regarding MRS amendment, concurrent LPS 3 amendment and Local Structure Plan. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. The documentation prepared as part of the structure plan, including the Bushfire Management Plan, is in accordance with State and local government requirements.</p>

The continual disregard for community input contravenes basic democratic principles in planning. When a community so strongly opposes as demonstrated through multiple formal rejections with:

- o 97% of property owners opposed to industrial rezoning
- o 75% rejecting urban rezoning proposals
- o 145 submissions opposing the advertised Crystal Brook Urban Concept Plan against 2 supporting submissions, and
- o 797 residents formally petitioning against the urban concept plan

It is obvious that despite this resounding opposition by the community that the City of Kalamunda have failed their rate payers and the broader community by continually ignoring their opposition of this proposal and should the WAPC, who are bound by legal and ethical obligations to honour community perspectives, approve this proposed amendment they would be disregarding documented community opposition and setting a dangerous precedent for bypassing democratic planning processes.

In conclusion, I strongly object to the proposed Wattle Grove South Structure Plan and the non WAPC approved MRS Amendment 1388/57 Report and Environmental Review as outlined above.

We also note [redacted] Executive Summery submitted to COK 3-11-2025

[name], representing more than 200 residents of Wattle Grove South and surrounding areas, strongly objects to the purported Wattle Grove South Structure Plan (WGSSP).

The proposal is prematurely advanced, arguably unlawful, and incapable of having statutory effect. It seeks to facilitate urban development on land that remains zoned Rural under both: • the Metropolitan Region Scheme (MRS); and • the City of Kalamunda Local Planning Scheme No. 3 (LPS 3).

Crucially:

- MRS Amendment 1388/57 has not been approved or gazetted by the WAPC;
- the proposal area remains subject to a live formal EPA assessment; and
- the WAPC has not directed nor authorised preparation or advertising of a structure plan.

Proper planning requires that strategic rezoning and environmental approval precede any urban structure plan. Instead, the WGSSP assumes an urban outcome first and seeks to justify it after the fact — reversing statutory planning logic and breaching orderly and proper planning principles.

Further, section 41 of the Environmental Protection Act 1986 prohibits a decision-making authority from making or implementing a decision that could allow a proposal to be implemented while it is under assessment by the EPA. Advertising or progressing a structure plan during a live EPA assessment arguably risks constituting such a prohibited decision, as it materially advances a proposal with clear potential for significant environmental impact. Accordingly, the WGSSP lacks lawful foundation and should not be progressed, advertised, endorsed, or relied upon.

**Key Defects**

Statutory invalidity & denial of procedural fairness to affected rural landowners.

Irreversible environmental loss, including native Banksia woodlands, Corymbia calophylla – Kingia australis communities, and habitat for threatened black cockatoos, with hydrological risks to the nearby internationally-recognised Greater Brixton Street Wetlands.

Unacceptable social, financial and amenity impacts, including coerced land aggregation, development-cost burdens, and a fivefold increase in vehicle movements on local roads without funded upgrades.

Governance and public-trust concerns, including perceived regulatory capture and administrative advancement of a private development agenda without lawful authority.

	<p>Lack of community mandate, with the original urban concept plan upon which the WGSSP is based having been overwhelmingly rejected by residents (145 written objections, only two in support)- yet subsequently altered by the City administration without re-consultation.</p> <p>Requested Determination [name] respectfully requests that the City and Council: formally decline to endorse or advance the WGSSP; advise the WAPC that the proposal is premature, lacks statutory basis, and is inconsistent with orderly and proper planning; and uphold the current Rural zoning and the significant environmental, rural-amenity and community values of Wattle Grove South.</p> <p>In summary The WGSSP: rests on no lawful statutory foundation; is proceeding during a live EPA assessment in apparent breach of environmental law principles; risks significant, irreversible environmental harm; imposes unacceptable burdens on unwilling rural landowners; and lacks any genuine community mandate. For these reasons, Council should decline to endorse or progress the purported WGSSP and notify the WAPC accordingly.</p>		
52	<p>Object - I wish to object to the above.</p> <p>The basis of the objection is the excessive residential density it introduces. The densities proposed are not compatible with the established rural character, which has always been defined by large lots, open space and low-intensity living.</p> <p>High-density suburban development would permanently alter the rural landscape, increase traffic and noise, and undermine the amenity that residents value. The area contains significant vegetation and environmental values that are better protected through large lot, low density zoning.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concern</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the residential density, amenity, and environmental impacts.</p>	<p>The Structure Plan sets out a design and management framework that seeks to:</p> <ul style="list-style-type: none"> <li>· Respond to the Western Australian Planning Commission and City of Kalamunda objectives to deliver immediate housing supply for the region, where a range of residential lot typologies are to be provided to cater to the wider socio-demographic.</li> <li>· Protect and integrate the environmentally significant vegetation and fauna habitat as part of proposed areas of the Conservation Reserves.</li> <li>· Emphasise tree retention and tree planting as a valued intrinsic feature of the Wattle Grove South urban landscape, to foster a healthy and prosperous community, in accordance with the principles of the City of Kalamunda's Urban Forest Strategy (2023-2043).</li> </ul>
53	<p>Object - I do not want to see a leafy sprawling local home to many native animals turned into a urban built up jungle .</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding industrial, amenity, and environmental impacts.</p>	<p>Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas.</p>
54	<p>Object – do not support</p>	<p>The Administration notes the submission and themes of</p>	<p>Noted.</p>

		- Objection	
55	<p>Object - As the landowner and rate payer of [address], I OPPOSE the Wattle Grove Structure Plan.</p> <p>This is not the first time I have voiced this opinion on this matter regardless of who is the driver or who has an agenda in recent years. The Roberts Day plan I rejected also. How many times does it take a resident living on Victoria Road to voice the same concerns for the CoK not to listen??</p> <p>I have been to council meetings and attended a CoK driven workshop discussing these concerns. I have even had a special meeting at the shire castle along side my parents who are also owners of the property voicing our concerns for what?? Who is listening??</p> <p>What is the gain? Apart from shire gaining more rates. The destruction of this rare and great area will be a disgrace if it goes ahead. What a Legacy.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Local Government not listening to earlier feedback</li> <li>- Amenity impact</li> <li>-</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the City's prior community engagement, and consideration of amenity impacts.</p>	Comments noted.
56	Object - I wish to lodge my opposition to the Wattle Grove Structure Plan, that is a no from me.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> </ul>	Noted.
57	<p>Background</p> <p>We appreciate that there has been a considerable amount of planning work undertaken by the Council both internally and through Consultants engaged by the Council, covering the subject site over the last decade, including extensive community consultation. This has included submissions from landowners within Precinct A supporting the previous commercial land use proposals for this land.</p> <p>In principle support for LSP</p> <p>The first component of this submission is to state that our client group has no objection to the progression of the LSP. The group appreciates that rezoning of the LSP area from Rural to Urban under the MRS is imminent and respects the applicants ambitions to achieve predominantly residential development over the land on the east side of Brentwood road.</p> <p>Precinct A Description</p> <p>Precinct A comprises 10 lots ranging in size from 1ha to 3.291ha totalling 15.4073ha. It's bordered by Brentwood Road to the east (sealed two way single carriageway), Welshpool Road East to the north (sealed 4 lane dual carriageway), Boundary Road to the west (mostly unsealed but trafficable) and Tonkin Hwy to the south. All of these roads, except Tonkin Hwy, provide access to the properties within the Precinct.</p> <p>Unlike the rest of the LSP, which is zoned Special Rural, Precinct A is zoned Rural Composite under the City's LPS3. The objective of this zone is :</p> <p>"To provide for small semi-rural lots that can accommodate a limited range of rural and low scale commercial land uses in a manner that will not adversely affect the landscape and environmental qualities of the land and are appropriate to the area."</p> <p>This is reflected in the land uses that include Garden Centre, Arbour Centre and Stock feed sales on lots [address] respectively. This is almost 40% of the total land area of the Precinct. The other properties are used for rural living purposes. All properties contain dwellings.</p> <p>Little remnant vegetation remains within this Precinct, and the remnant vegetation has been assessed as completely degraded in the vegetation condition assessment carried out by Coterra Environment as part of the LSP.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Design concerns</li> <li>- Precinct A land use</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the design and land use considerations for Precinct A.</p>	Comments supporting the progression of the structure plan and rezoning are noted. Comments noting that residential development is a noise sensitive land use are noted in Precinct A for adjoining Welshpool Road East. The suggested modified 'Light Industry' zone notionally called an 'Enterprise Area' has merit. It is agreed that this would enable growth of the current businesses and establishment of other businesses. We do not object to this being further investigated by the landowners of Precinct A. It is agreed that text provisions could be included in the Structure Plan to accommodate this opportunity. The suggestion for an 8m wide landscape interface between Precincts A and B is supported in principle on the basis of providing a visual transition between the Precincts. The proposed Boundary Rd closure is not proposed as a requirement of this Local Structure Plan proposal. Rather, it is necessitated due to its proximity to the proposed grade-separated interchange at Tonkin Highway / Welshpool Road East – a project lead by MainRoads WA.

Off Site Impacts on Precinct A.

The LSP proposes Precinct A to be development for Residential purposes with densities ranging from R20 to R40.

Current surrounding land uses are generally rural residential in nature with encroaching residential to the north-west and encroaching General Industrial to the west and south-west. Some specific uses have impacts, particularly noise impacts. There is an approved dog boarding kennel on the opposite side of Welshpool Road East. The LSP suggests that noise from within the kennel is meant to be retained within 60m of the kennels under the terms of their approval. This may be so, but the practicality of policing this is a difficult task and burden on the Council. The EPA's Guidance for the Assessment of Environmental Factors – Separation Distances between Industrial and Sensitive Land Uses includes reference to dog kennels and establishes a recommended separation of 500m. Whilst we are not suggesting that the kennel noise will extend that full distance, it is worth noting that the 500m effectively covers the whole of Precinct A.

Traffic noise from both Welshpool Road East and the Tonkin Highway will necessitate a 4.0m and 5.0m high concrete noise walls plus quiet house design packages according to the LSP. This is exacerbated by the proposed elevation of the new Tonkin Hwy bridge over Welshpool Road East and the on and off ramps that adjoin this Precinct.

The Welshpool Road East noise only impacts Precinct A because the road deviates away from the LSP area after the Crystal Brook Road (Brentwood Road) intersection. The circumstances of Precinct A are such that it is wedged between two significant noise generating roads.

Residential development is a noise sensitive land use. Creating residential lots in this precinct will result in low amenity for future residents. In addition to this, the construction of 4 and 5m high noise walls will result in a reduced amenity for the broader community.

In addition to this, the site is on the fringe of aircraft noise and movement impact contours.

#### Preferred Land Uses

Allocating this low amenity area to residential is potentially not the best land use and misses an opportunity to provide security for the existing businesses and round the Precinct out with other small businesses creating employment opportunities and services for residents that will not be available on the large scale General Industrial land proposed to the west and south.

As mentioned above, almost 40% of the Precinct is occupied by established commercial uses. This reflects the current Rural Composite zoning. The businesses are generational businesses. The Arbour Centre (lot 2) has grown over many years and is now run by the sons of the business founder. Magic Garden Supplies (Lot 146) is run jointly by a father and son. RM Smith and Sons Stockfeeds (Lot 101) is operated by Brett Smith, the son of Ray (RM) Smith, who intends to pass the business on to the third generation in due course. The LSP acknowledges these businesses and notes that they will have non-conforming use rights under the proposal. Unfortunately, this provides little security for the long term growth of the businesses. We note that a portion of the former turf farm on the opposite side of Brentwood Road where a small portion has been set aside as Light Industry in recognition of the existing business.

The existing businesses, combined with the low level of residential amenity of this Precinct has brought the landowner group to a position where they are keen to provide land uses that achieve a middle ground between the LSP proposed use (residential) and the expanding large scale General Industrial areas to the west and south. This is proposed as a modified Light Industry zone which we have notionally called an Enterprise Area. This would enable growth of the current businesses and establishment of other, ideally, family businesses. Whilst not strictly composite in nature, it is proposed that a Single House be included as a 'P' use.

Land uses would be as per the definitions contained in the City of Kalamunda's LPS3 and their permissibility would be generally as per the Light Industry zone in the Zoning Table in that Scheme with the following variations:

Land Use	Current Permissibility	Proposed Permissibility
Bulky Goods Showroom	P	D
Fuel Depot	P	X
Industry – Light	P	D
Industry – Rural	P	D

Industry – Service	P	D
Logistics Centre	D	X
Motor Vehicle Repairs	P	D
Motor Vehicle Wash	P	D
Motor Vehicle Wrecking	P	X
Salvage Yard	P	X
Single House	X	P
Transport Depot	P	X
Veterinary Centre	P	D
Warehouse/Storage	P	D

The objective of the Enterprise Area against which development applications would be considered would be as follows:

To provide for small scale light industrial lots to accommodate a range of commercial land uses, with capacity for residential development on the lots, in a manner that will not adversely affect residential development outside of the designated Enterprise Area.

We submit that this objective and the list of land uses could be inserted as a new point 4.1.7 in Part One of the LSP. This would enable future applications to be determined by Council consistent with the intent.

#### Impact on LSP

It's important to acknowledge the transition from the Enterprise Area to the residential land proposed on the opposite side of Brentwood Road. To this end it is proposed to require an 8m wide landscaping strip requirement along the full frontage to lots on the western side of Brentwood Road. This would be contained within the private properties, so in addition to streetscape planting in the widened road reserve.

#### Road Hierarchy

The road hierarchy within the LSP would not change. The conceptual road layout, however, would change for Precinct A as the lots would be larger to accommodate non-residential uses. To this end we have prepared a conceptual layout which is attached to this submission.

#### Public Open Space.

As this submission is proposing an essentially non-residential in nature, the Liveable Neighbourhoods standard (10%) would not apply. That said, the LSP incorporates a linear POS link along the gas pipeline easement adjacent to Tonkin Hwy. This submission proposes to retain this link. It does, however, propose the removal of the POS outside of the pipeline easement within Lot 12. This POS would be purchased through POS cash-in-lieu

contributions (pursuant to s.152 of the Planning and Development Act) from across the LSP area and would enable a minor reduction in POS land given up in the other Precincts, where there is significant catchment overlapping, enabling the creation of additional residential lots. Alternatively, the gas pipeline easement could be shown in the same manner as it is within Precinct B.

The POS located over the front of Lots 8 and 9 would also not be required. We note that Lots 8 and 9 are almost completely cleared of natural vegetation comprising mainly of dwellings, outbuildings, paddocks and hardstand.

#### Pedestrian and Cycling Network

As the POS along the gas pipeline is proposed to be retained, and Boundary Road is proposed to remain open (refer below), then pedestrian and cycling network within the LSP will not be affected by this proposal.

#### Primary School

Under the WAPC's OP 2.4 Planning for School Sites, a Primary School requires a catchment of approximately 1.500 dwellings. Table 1, section 2.4 of the TIA estimates lot yield across the LSP area. It calculates a total of 1646 lots will be created. 207 of those are proposed to come out of Precinct A. The Enterprise Area will include a Single House as a 'P' use, and there will already 10 dwellings in this Precinct. If the existing dwellings remain, the total for the LSP will be altered to 1449. If they are all removed it would be 1439. If the number of dwellings is doubled, taking into account that subdivision of the existing lots is likely to occur, the alteration of the catchment would result in a total of 1459 dwellings. In any case, any alteration of the number of dwellings in Precinct A will have to noticeable impact on the proposed Primary School catchment.

#### Bushfire Management

The proposed alteration will have to impact on bushfire management.

#### Boundary Road

The LSP proposes the closure of the Boundary Road intersection with Welshpool Road East. It will effectively be replaced by a new left in/left out intersection at the location of the existing property crossover for Lot 2. The TIA provides no explanation for this closure that we could find. The Boundary Road provides daily access to the largest commercial site within the Precinct (lot 146) and the rear of Lot 12. Both of these landowners are extremely keen to retain this access and the owner of Lot 2 has no desire for a road intersection with Welshpool Road East. Based on the crash assessments done in the TIA it is the safest of all the existing intersections with only 1 minor property damage only accident in 5 years.

The owner of Lot 146 has been liaising with MRWA for many years, having provided significant land for the widening of Welshpool Road East and having been asked by MRWA to provide land for a temporary lay down area during the construction of the Tonkin Hwy Welshpool Road East intersection. In the course of these discussions he has asked MRWA if there are any plans to alter the Boundary Road intersection with Welshpool Road East. [name] (MRWA Stakeholder and Community Engagement Consultant) provided written confirmation on both 16/2/23 and 6/9/23 that the intersection would be retained.

We request that the LSP be amended to retain the Boundary Road intersection with Welshpool Road East in place of the proposed new intersection at Lot 2.

#### Activity Centre

The landowner group support the proposed activity centre within Precinct A. It would compliment the other commercial uses proposed in this submission.

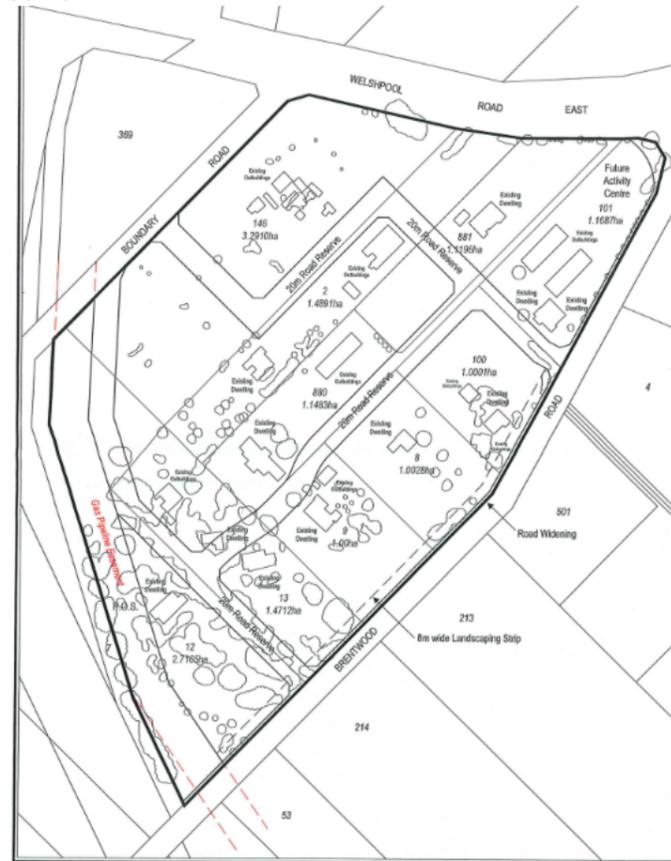
#### Summary

The essence of this submission is to support the progression of the Wattle Grove South LSP with modification to Precinct A to reflect the low residential amenity of its location and the established commercial activities within. A

notional nomenclature of Enterprise Area is proposed, which would provide for small scale almost commercial and discretionary light industrial and residential activities that would act as a transition of land uses from the existing Rural Composite zone to a more urban zone in keeping with the imminent Urban zoning under the MRS. This will afford significantly more protection of the existing approved uses over the principle of non-conforming uses.

As well, the retention of the current intersection of Boundary Road with Welshpool Road East is also seen as a critical aspect and will remove the need for a new intersection to be created over Lot 2.

CONCEPT



<p>58</p>	<p>Object - I do not support this development. This area is part of the "hills lifestyle", live on large blocks instead of in a concrete bitumen box. People will be forced to move once someone else sells and they have to live with all the development going on around them.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the amenity impact of the draft Plan.</p>	<p>Comments Noted.</p>
<p>59</p>	<p>Support - As the owner of [address], I strongly support the proposed Structure Plan for Wattle Grove South, which is currently under advertisement by the City of Gosnells.</p> <p>Having owned this property for 26 years, I have closely followed the area's ongoing planning efforts.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Location benefits</li> </ul>	<p>Comments noted.</p>

	<p>I am delighted to see the design finally taking shape. The proposed plan appears well-reasoned, incorporating an effective road network, future residential zones, and public open spaces throughout the region. This will help meet the growing demand for housing in the City of Kalamunda community.</p> <p>Wattle Grove South's strategic location offers excellent access to key transport links, proximity to established residential neighborhoods, the Forrestfield Train Station, major highways such as Tonkin and Roe, and employment opportunities in the Maddington Kenwick Strategic Employment Area. Developing this area into a new residential community is a logical step forward, rather than allowing it to remain as underutilized large land parcels.</p> <p>I am familiar with the EPA process and appreciate Hesperia's dedication to preserving the existing tree canopy wherever feasible. I also commend the plan's focus on retaining the limited remaining native vegetation within designated conservation areas.</p>		
60	Support – I support the proposal	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul>	Noted.
61	<p>Object - My husband and I Strongly oppose the Proposed Structure Plan for Wattle Grove South. Once again, the Kalamunda shire has blatantly disregarded what the residents DO NOT WANT!!!</p> <p>We've been here before and you are not listening to the residents once again! Why must this unique and precious bushland need to be wiped out? I see it every day the wildlife around me and I realise how PRIVILEGED!!! and very lucky I am to live here. This is the lifestyle I chose and still want. Please listen we don't want it gone! gone! gone! forever. This act will be remembered as a very reckless environmental vandalism. Be remembered as the protectors and champion for the environment and its unique wildlife and bushland.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Local Government not listening to previous comments</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the City's previous engagement relevant to the WGS area, and consideration of amenity, and environmental impacts.</p>	Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas.
62	This submission was unable to be copied due to document restrictions.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Procedural concerns</li> <li>- Inconsistency with planning framework</li> <li>- Perception of community objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	Please refer to previous response regarding EPA assessment and recommendations to Minister for Environment, and planning processes and approvals to follow regarding MRS amendment, concurrent LPS 3 amendment and Local Structure Plan. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. The Wattle Grove Structure Plan falls within a wider area that has been mapped by the federal Department of Defence as having 'slight potential' for UXOs due to field firing that occurred within during early 1900s and a mortar bomb that was

			<p>located in 1986. It is worthwhile to note that the area mapped as having 'slight potential' for UXOs includes the localities of Maddington, Kenwick, Beckenham, Langford, Thornlie, Huntingdale, Gosnells, Canning Vale, Southern River, Champion Lakes, Camillo, Seville Grove, Kelmscott, Martin and Orange Grove.</p> <p>Please refer to previous comments regarding impacts from the historical and existing land uses in the wider Yule Brook catchment and its influence in terms of nutrient loading on the wetlands within the GBSW area. Currently, the site does not contain any formalised stormwater management infrastructure or measures implemented for the treatment of water quality runoff or groundwater at the site (e.g., bio-retention areas). Future environmental conditions will require future residential development to ensure no adverse impacts to Greater Brixton Street Wetland, including impacts to the wetland's persistency, hydrological regime, water quality, ecological integrity and ecological function.</p> <p>The project will require the implementation of 'best practice' stormwater management, which includes the installation of bio-retention swales and basins will result in improving the water quality and reduce the nutrient levels currently exported from the site. Regarding the submissions reference to the term "hydro-plain", this term is not a recognised hydrological or hydrogeological nomenclature and no scientific explanation or definition on the meaning is provided. The LWMS demonstrates the extent to which hydrological and hydrogeological spatial data and analysis has informed the LSP.</p>
63	<p>As City of Kalamunda ratepayers and local residents (REDACTED) we are strongly affected by the proposal, development would have a <b>negative impact on our rural lifestyle and amenity</b>.</p> <p><b>We are City of Kalamunda ratepayers on a number of properties</b>, we strongly object to the way in which CoK attempts to exclude comment from City of Gosnells residents.</p> <p>[REDACTED] is a scenic, winding, no-through road and each of the CoG properties shares at least one boundary with CoK properties. The area has abundant wildlife and daily many Kangaroos lounge in the paddocks adding to the ambience of this tree lined, winding lane.</p> <p>Access to CoG properties is only through CoK, City of Gosnells residents in [REDACTED] can only access their properties by two routes both of which require entering via CoK. Entering is from either an easterly or westerly direction on Crystal Brook Road, the easterly direction involves driving several kilometres from the CoG / CoK Kelvin Road boundary through CoK, down Valcan Road to the CoK / CoG boundary and the western route involves driving approximately seven kilometres from the Tonkin Highway CoG / CoK boundary to the [REDACTED] CoK / CoG boundary. <b>We are therefore strongly affected by all of CoK actions.</b></p> <p>We are <b>perplexed as to why this is being presented as a structure plan</b> when to have legal standing it must:</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Procedural concerns</li> <li>- Amenity impact</li> <li>- Environmental impact</li> <li>- Already sufficient land supply for new housing</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Wattle Grove South represents a consolidated area of the wider 'Urban Expansion' footprint identified by the Western Australian Planning Commission's (WAPC) North-East Sub-Regional Planning Framework. The proposed boundaries of the urban area which formed the MRS amendment proposal is a direct response to key considerations and in particular, feedback provided by the local community during the consideration of a draft conceptual masterplan for the broader Wattle Grove area, and the subsequent decision in late2020 by the City of Kalamunda Council to reduce the urban development area to the south of Crystal Brook Road. In particular, this decision</p>

<p>1. Be formally directed by resolution of the Western Australian Planning Commission (WAPC); and</p> <p>2. Apply only to land zoned 'Urban' under the Metropolitan Region Scheme (MRS).</p> <p><b>Neither of these conditions has been met.</b></p> <p><b>The land remains zoned Rural, and there is no WAPC resolution authorising any Structure Plan to be prepared over it.</b></p> <p>Historically the City appears to rural zone residents to have supported proponent-led proposals for Wattle Grove South and worked in conjunction with a specific developer in what would be planned destruction of habitat, flora and fauna of this rural zone. Whatever company or subsidiary company has been / is involved, in whatever form, in Wattle Grove South Urban Development proposals it appears it one specific developer has a strong determination for development.</p> <p>The City says it does and will protect the tree canopy yet in recent weeks in the destruction of habitat appears to have been approved by CoK in Ridley Road Wattle Grove South, with an 'error' cited by the City in approval of the destruction of significant trees. This developer destruction of established trees in the Ridley Road saw diminishing flocks of Carnaby Cockatoos flying around, screeching sadly, looking for old established tree habitat and food source. For sound planning practice the only way forward for development of Wattle Grove South is for <b>ORGANIC GROWTH OF THE RURAL ZONE</b>. As Organic Growth is a slow progression of properties individually subdividing into slightly smaller lots over time (eg: 10 acres into 4 lots or five acres into 3 lots) the slow development Organic Growth <b>minimises impact on the environment and controls retention of native vegetation and wildlife habitat</b>.</p> <p>CoK and developers appear to continue to ignore that Keswick Convention Centre Kelvin Road, Wattle Grove rural zone, was an army camp until 60 years ago and this whole area was used as a firing range for the army camp. Properties in the area, including our property have <b>UXO's (UNEXPLODED ORDNANCES) listed on the property Title this renders the area unsuitable for high density development. The risk from UXO's does not decrease over time, it increases over time</b> as chemical and physical degradation occurs, over many years, the chemical composition of explosives may change and corrosion can make UXO unstable and unpredictable. Mixed explosives can separate, with more sensitive contact explosives migrating to random places in the shell. The increased instability may make the ordnance harder to defuse safety. The casing can degrade making it more susceptible to detonation if disturbed. The City has been made aware of this risk many times over the years of the City continually trying to destroy this rural area.</p> <p>Having spoken with Aboriginal people it is my understanding that this area includes what is referred to as 'Birthing Trees'. Trees where aboriginal women went to give birth, I see no references in the report to any aboriginal heritage or sites.</p> <p>It appears all the City of Kalamunda is interested in is becoming a bigger council with more ratepayers to increase its significance in LGA's as it is at risk of being 'swallowed up' in amalgamation of LGA's which will undoubtedly occur in the coming years.</p> <p>The City is very aware of, yet chooses to ignore, that <b>current planning frameworks reveal a significant Perth metropolitan surplus of land designated for urban development, making the rezoning of Wattle Grove South unnecessary at this time.</b></p> <p><b>The Department of Planning's Urban Monitor Records show Perth's zoned urban land could take greater than 60 years to fully utilise.</b></p> <p>The WAPC retains full discretion to reject rezoning when compelling reasons exist, as they do in this case. The proposal contradicts principles of community wellbeing, environmental conservation and good governance outlined in the State Planning Strategy 2050. Whilst the North-East Sub-Regional Planning Framework identifies Wattle Grove South as a potential future urban expansion area, this designation is not an automatic trigger for rezoning, the Framework explicitly calls for flexible planning that responds to local conditions and changing circumstances so again, ORGANIC GROWTH is the way forward for this rural zone.</p> <p><b>The North-East Sub-Regional Planning Framework has identified approximately 7,570 hectares of land already earmarked for projected population growth through 2050. This substantial building land reserve has been further supplemented by Minister Carey's recent announcement of 6,300 new housing lots in the metropolitan area.</b> With sufficient approved subdivisible land to last 60 years based on current Perth population growth there is absolutely no need for CoK to persistently go against the wishes of the majority of the residents who are agreeable to Organic Growth but firmly against urban development. The boundary sharing City of Gosnells rural zone of Orange Grove</p>		<p>primarily responded to the higher quality environmental features associated with the Crystal Brook located to the north of Crystal Brook Road, which are excluded from this Structure Plan area. This Structure Plan is therefore consistent with the WAPC's Framework as it promotes a consolidated 'Urban' area as envisaged by the North-East Sub-Regional Planning Framework. The proposal advocates for a consolidated urban form, focusing residential development in an area with existing infrastructure, whilst protecting environmental features to create sustainable communities that will become attractive places to live and work. Please refer to previous response regarding EPA assessment and recommendations to Minister for Environment, and planning processes and approvals to follow regarding MRS amendment, concurrent LPS 3 amendment and Local Structure Plan. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. The Wattle Grove Structure Plan falls within a wider area that has been mapped by the federal Department of Defence as having 'slight potential' for UXOs due to field firing that occurred within during early 1900s and a mortar bomb that was located in 1986. It is worthwhile to note that the area mapped as having 'slight potential' for UXOs includes the localities of Maddington, Kenwick, Beckenham, Langford, Thornlie, Huntingdale, Gosnells, Canning Vale, Southern River, Champion Lakes, Camillo, Seville Grove, Kelmscott, Martin and Orange Grove – the majority of which have been urbanised. Further consideration for UXO can be considered at construction stage through management plans, in accordance with standard Department of Defence advice. Please refer to previous comments regarding: · impacts from the historical and existing land uses in the wider Yule Brook catchment and its influence in terms of nutrient loading on the wetlands within the GBSW area. Currently, the site does not contain any formalised stormwater management infrastructure or measures for the treatment of water quality runoff or groundwater at the site (e.g., bio-retention areas) · future environmental conditions will require future residential development to</p>
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	<p>is not expected to develop, <i>City of Gosnells reporting documentation says, and I quote, 'urban development in Orange Grove is not expected to occur in the short to medium term (less than 15 years).</i></p> <p>There has been a lack of public awareness of the proposal highlighting a critical lack of consultation and democratic process as CoK has over many years repeatedly fought local residents for development of the proposed rezoning area. Banksia, Marri, Jarrah and Corymbia-Kingia vegetation, threatened black cockatoo habitat and critical ecological linkages are all threatened by urban development. These were recognised in the independent AECOM report commissioned by the City.</p> <p>Hydrology and the Greater Brixton Street Wetlands UWA hydrological mapping demonstrates that the proposed area lies within the hydro-plain influencing the Greater Brixton Street Wetlands, a site of international scientific significance. Urbanisation poses high risks to hydrology, nutrient loading, groundwater flows, and wetland ecosystem integrity.</p> <p>Social and Amenity Impacts</p> <ul style="list-style-type: none"> <li>• Significant loss of rural character and lifestyle</li> <li>• Forced infrastructure and development cost burdens</li> <li>• Traffic increases from ~2,000 to over 10,000 vehicles/day on Crystal Brook Road</li> <li>• Loss of canopy and increased heat island effect</li> <li>• Community distress and erosion of trust</li> </ul> <p>Governance and Integrity Concerns Under s.2.10 of the Local Government Act 1995, councillors must act with care, diligence, integrity <i>and in the public interest</i>. Advancing a premature, unlawful, or misleading planning proposal exposes the City to findings of maladministration and undermines public confidence in planning processes. The City perceived urbanisation agenda and reliance on proponent-led assumptions, limited disclosure to landowners, and administrative actions suggests inevitability despite unresolved environmental and statutory matters.</p> <p>Requested Actions We, [name], as City of Kalamunda ratepayers respectfully requests Council resolve to:</p> <ol style="list-style-type: none"> <li>1. Decline to endorse or progress the WGSSP unless and until: <ul style="list-style-type: none"> <li>• The MRS rezoning is lawfully approved and gazetted; and</li> <li>• The EPA assessment is completed in accordance with s.41A; and</li> <li>• All affected landowners have been afforded proper procedural fairness.</li> </ul> </li> <li>2. Advise the WAPC formally that the WGSSP is premature and lacks statutory foundation.</li> <li>3. Suspend all expenditure and officer time associated with the WGSSP pending statutory compliance.</li> </ol> <p>Conclusion The purported WGSSP has no legal foundation, proceeds contrary to orderly and proper planning principles, contradicts the statutory purposes of the MRS Rural zone, and threatens high-value environmental and community assets. We further request the City rejects or suspends the WGSSP and advises WAPC that it does not want to continue with the developer-led proposal until all legal preconditions are satisfied.</p> <hr/> <p>I strongly object to the proposal to rezone land in Wattle Grove South from rural to urban (MRS 1388/57). The land should remain a rural zone.</p>		<p>ensure no adverse impacts to Greater Brixton Street Wetland, including impacts to the wetland's persistency, hydrological regime, water quality, ecological integrity and ecological function.</p> <ul style="list-style-type: none"> <li>· implementation of 'best practice' stormwater management, which includes the installation of bio-retention swales and basins will result in improving the water quality and reducing the nutrient levels currently exported from the site.</li> <li>· the term "hydro-plain" is not a recognised hydrological or hydrogeological nomenclature</li> </ul>
64	<p>Comment only - Having only recently built we have no intention of selling. We have Hawks nesting in the pine trees, numerous Honey bee eaters nesting as well as many Bandicoots, bobtails and Blue Fairy Wrens. Not to mention all the Fauna and Flora. To have this habitat demolished for residential housing, schools, roads and other infrastructure is deplorable.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul>	<p>Comments noted. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term</p>

		Please refer to body of the report for detailed discussion regarding the City's previous engagement relevant to the WGS area, and consideration of amenity, and environmental impacts.	canopy coverage and ecological linkages between the proposed conservation areas.
65	<p>Object - This is quite a transparent attempt by [name] to yet again cash in on the property he holds and destroy the character of the area. I strongly disagree and will keep strongly disagreeing as many times as it takes. He needs to only make a huge profit from his property rather than an insane one.</p> <p>Especially planning for a primary school makes it clear that Wattle Grove South is intended to be the same as Wattle Grove West - high density properties, minimal trees, crime issues and the destruction of the hills lifestyle. Allowing that to happen will impact Lesmurdie in two ways.</p> <ol style="list-style-type: none"> <li>1. a huge number of children within the LSHS catchment - where LSHS is already at capacity.</li> <li>2. driving for subdivision in Lesmurdie - where there is no deep sewerage, nor the ability to install it</li> <li>3. clearly some lining of councilor pockets? otherwise they wouldn't keep supporting something that antagonizes the area.</li> </ol>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> <li>- Infrastructure limitations within the City (reticulated sewer in Lesmurdie)</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the City's previous engagement relevant to the WGS area, and consideration of amenity, and environmental impacts.</p>	Comments noted. The establishment of the proposed primary school in Wattle Grove South will enable more capacity for child enrolments in this area, therefore not impacting on Lesmurdie.
66	<p>Comment only - I hope that large trees are protected and planners have to keep them similar to the sub development in Maida Vale Road.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Tree retention</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the draft Plans' capacity to facilitate tree retention.</p>	Comments noted. Yes agreed, tree retention and canopy tree planting is an ongoing commitment that shall occur between a proponent and the City of Kalamunda during each stage of development of the relevant Planning Precinct. Proactive preparation during the detailed design of subdivision layouts for each of the Planning Precincts is necessary to achieve the best practice outcomes sought by the City of Kalamunda's Urban Forest Strategy.
67	<p>To the City of Kalamunda</p> <p>I appreciate the opportunity to provide feedback on the proposed Wattle Grove South Structure Plan. For ease of understanding, I have set out my comments below so that councillors without a planning background can fully appreciate the practical and community impacts of what is being proposed.</p> <ol style="list-style-type: none"> <li>1. Background – How We Got Here Since around 2017–2018, the City of Kalamunda has repeatedly attempted to rezone Wattle Grove South. <ul style="list-style-type: none"> <li>• In 2018, the proposal was to rezone the area to industrial. <ul style="list-style-type: none"> <li>o Local sentiment was overwhelmingly opposed.</li> <li>o A Special Electors Meeting confirmed this (173opposed /17 for industrialisation), and Council rightly withdrew the proposal.</li> </ul> </li> </ul> </li> </ol>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Procedural concern</li> <li>- Inconsistency with planning framework</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the City's previous engagement relevant to the WGS area, and consideration of amenity, and environmental impacts.</p>	Please refer to previous response regarding EPA assessment and recommendations to Minister for Environment, and planning processes and approvals to follow regarding MRS amendment, concurrent LPS 3 amendment and Local Structure Plan. Section 51B of the Environmental Protection Act 1986 empowers the Minister for Environment to declare areas as Environmentally Sensitive Areas (ESAs) pursuant to the Environmental Protection (Environmentally Sensitive Areas) Notice 2005 (ESA Notice). It is considered to be the landowner's responsibility to engage with DWER and request these ESAs be revoked.

Soon after, from 2020 onward, the focus shifted to urbanisation-smaller residential lots-despite community sentiment strongly favouring the existing rural-residential character of the area.

The current Structure Plan is the latest step in that urbanisation agenda, now being advanced by Hesperia and administered by the City, despite the City's local planning scheme showing the area as zoned rural/special rural. Structure plans are meant to be developed for areas already zoned rural. This WGSSP clearly 'puts the horse before the cart'.

## 2. The Area's Unique Character and Why It Matters

Wattle Grove South is one of the last remaining rural-residential pockets within 16 km of the Perth CBD.

It provides:

- large acreage properties
- semi-rural lifestyle
- significant vegetation and local biodiversity
- a landscape highly valued by long-term residents

Once lost, this character cannot be replaced. Development in this area does not just 'add houses' it fundamentally and irrevocably changes the biodiversity of this foothills locality.

## 3. Community Sentiment Has Been Consistent and Clear

Across multiple consultations over several years:

- High-density housing was firmly rejected by local landowners.
- Most landowners supported keeping the area as rural, and if any changes were to occur, they preferred the minimum 1 ha size lots defined in the Act that constitute rural residential definition development—not the small blocks in this high density Structure Plan.

For councillors unfamiliar with planning terminology:

'High density' means tightly packed housing with very small block sizes—something entirely inconsistent with the character and expectations of landowners in Wattle Grove South. During the multiple community consultation sessions held by Roberts Day and the City back in 2019/2020, there was very little to no support by local landowners for lot sizes below 100 sqm, yet this structure plan consistently shows block sizes between 280 sqm and 450 sqm.

## 4. Misleading Use of the Term "Urban Investigation"

The Structure Plan repeatedly uses the term 'urban investigation area,' implying the land is intended or required to be urbanised. This is incorrect and misleading.

The term only means the area may be investigated—not that urban zoning is predetermined or inevitable. Many residents have been left with the false impression that urbanisation is already a 'done deal', an impression unfortunately fanned by the City as it prioritises its pursuit of more rates over the express wishes of the community to prioritise the long term environmental values in the City over all other priorities.

## 5. Classification of the MRS Amendment as 'Minor' Is Incorrect

The as yet unapproved MRS Amendment underpinning this Structure Plan was processed as a 'minor amendment'. This suggests:

- minimal environmental impacts
- minimal community impacts
- minimal infrastructure impacts In reality, the amendment affects:

- over 120 hectares of land,
- about 80 landowners within the proposed development area
- In excess of well over 200 additional landowners that currently access Wattle Grove South that is Not in the proposed sub division development area – through massively increased traffic and general rural erosion and metropolitan creep adjacent to their properties, and
- the complete transformation of a rural-residential locality.

This should have been treated as a major amendment, with the higher level of scrutiny that accompanies that classification.

6. Misrepresentation of Landowner Support

Early in the process, the developer claimed to have over 80% landowner support. This was false.

Yet the City has chosen to repeat this claim, shaping a public narrative that most landowners were ‘on board’ when they were not. This has created confusion and mistrust within the community.

Even the authors of the WGSSP acknowledge that the plan has ‘fragmented’ support which has enormous cost implications for the provision of infrastructure which the City should avoid at all costs.

7. The Structure Plan Fails to Consider Existing Investments and Land Uses

The Structure Plan has been designed as though all land is vacant and available for redevelopment.

However, many landowners have made:

- significant financial investments
- long-term lifestyle commitments
- property improvements that do not align with the plan

The Plan offers no genuine pathway for these properties to be integrated without major redesigns—suggesting that the lived reality of current landowners was largely ignored.

8. Environmental Concerns – The Need for an Independent Review

The Environmental Review was document presented as if it were government/WAPC prepared, but was in fact produced by consultants engaged by the developer.

This is misleading and represents a direct conflict of interest.

Given the environmental significance of:

- remnant vegetation
- fauna habitat
- proximity to sensitive wetland systems
- groundwater patterns linked to the Greater Brixton Street Wetlands

a full, independent, government-led environmental review is required—not one prepared to support a developer’s application.

9. Key Concerns in Summary

We all oppose the Structure Plan for the following reasons:

<p>1. It conflicts with long-standing and consistently-expressed majority community sentiment.</p> <p>2. It is based on an yet to be approved MRS amendment wrongly classified as 'minor'.</p> <p>3. The process has included misleading statements regarding landowner support.</p> <p>4. The Plan forces landowners into feeling that urbanisation is inevitable, when it is not.</p> <p>5. The unique rural-residential character of the area is at risk of being lost forever.</p> <p>6. The environmental work should be independently conducted by government—not paid consultants.</p> <p>10. Fundamental Questions Councillors Need to Consider I ask the City of Kalamunda to explain:</p> <p>1. How can a developer who owns only a small portion of the land be permitted to coordinate and drive a Structure Plan covering land they do not own?</p> <p>2. Why is the City advancing an urbanisation agenda that its own residents have repeatedly rejected?</p> <p>3. Why has the City promoted the misleading impression that urbanisation is inevitable or already approved?</p> <p>4. Where is the transparent reporting of support vs opposition submissions for the MRS amendment?</p> <p>These are genuine questions that deserve clear answers.</p> <p>11. Personal Statement When I purchased my property in 2015, it was with the intention of living on a small acreage for the rest of my life. These constant attempts at urbanisation put that at risk.</p> <p>I will continue to oppose proposals that mislead the community and undermine the rural character of Wattle Grove South.</p> <p>It should be our elected councillors standing up for their residents—not supporting a development that most landowners overwhelmingly do not want.</p> <p><b>** Second part of submission</b></p> <p>Wattle Grove South Structure Plan – [name] Submissions Against Approval of Structure Plan</p> <p>1. [name] thanks the City of Kalamunda (City) for the opportunity to make a submission and provide comments with respect to the above-described structure plan.</p> <p>2. This submission to the City refers to the 'Wattle Grove South – Local Structure Plan' dated August 2025 (Plan) that has been provided to the City to consider and accordingly provide its comments and recommendation to the Western Australian Planning Commission (WAPC). The Plan has been submitted by Hesperia Projects Pty Ltd and Jardim Property Group (Proponent).</p> <p>3. [name] provides this submission in accordance with the City's advertising of the Plan, with submissions requested to be provided by 5 December 2025 at 5:00pm.</p> <p>4. These submissions will address the Plan under the following headings:</p> <p>(a) Issues Arising Under the Planning Framework;</p> <p>(b) Environmental Issues; and</p> <p>(c) Conclusion.</p> <p>5. [name] overarching submissions are that the Plan should be recommended for refusal</p>		
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by the City, and further that:

(a) consideration of the Plan by the City this stage, prior to any MRS amendment occurring, is not in the interests of the orderly and proper planning, and has allowed the production of what is a presumptive and non-comprehensive Plan;

(b) the Plan lacks certainty with respect to staging, as well as to securing key infrastructure and services;

(c) the Plan has not addressed uncertainty in relation to certain environmental and Aboriginal cultural heritage impacts, despite being made expressly aware of such

uncertainty by the Environmental Protection Authority; and

(d) the Plan has not undertaken meaningful and effective community consultation to inform mitigation measures.

6. These points are considered in further detail below.

7. [name] submits that the Plan is incomplete, has been prepared too early in time, and is fundamentally inappropriate such that the City and the WAPC should, respectively, not recommend the approval or approve the Plan.

8. [name] seeks that the City strongly convey its lack of support to the Plan to ensure that future development in the Plan area is environmentally sensitive, well thought out, and wholly appropriate.

#### A. ISSUES ARISING UNDER THE PLANNING FRAMEWORK

9. [name] broadly, has three main areas of concern with respect to the City's consideration of the Plan. The first of these areas is of a procedural nature, and relates to the present consideration of the Plan in the context of orderly and proper planning. The second relates to the context of the present zoning and use of the land, and finally towards the infrastructure and services required.

#### Orderly and Proper Planning

10. The Planning and Development Act 2005 (PD Act) has the core purposes to:<sup>1</sup>

(a) provide for an efficient and effective land use planning system in the State; and

(b) promote the sustainable use and development of land in the State

11. The Deemed Provisions contained within the Planning and Development (Local Planning Schemes) Regulations 2015 (Deemed Provisions)<sup>2</sup> generally allow a structure plan to be prepared with respect to an area that has been:<sup>3</sup>

(a) identified within a local planning scheme as an area suitable for urban or industrial development, and identified as being such an area where a structure plan is to be prepared prior to any subdivision or development;

<sup>1</sup> Planning and Development Act 2005 (WA) (PD Act), s 3(1)(b)-(c).

<sup>2</sup> Planning and Development (Local Planning Schemes) Regulations 2015 (WA), Schedule 2 (Deemed Provisions).

<sup>3</sup> Deemed Provisions, r 15.

(b) designated by a State planning policy as requiring the preparation of a structure plan; or

(c) considered by the WAPC to be an area where a structure plan is required 'for the purposes of orderly and proper planning'.

12. In the present case, we understand that the Proponent has acquired, by letter of 31 July 2025 (WAPC Letter), consent from the WAPC under the last point above for the preparation of the Plan. Such consent was made out subject to the following conditions:

- That the land be appropriately zoned under the Metropolitan Region Scheme (MRS) and Local Planning Scheme (LPS) prior to the WAPC making a decision on the structure plan;
- The proponent agreeing, if required, to defer the determination of the structure plan until the land is appropriately zoned; and
- The proponent being advised that support to the preparation of a structure plan should not be construed as WAPC's support to a future structure plan or to the proposed rezoning of the land under the MRS and LPS.

13. [name] has serious concerns as to the City's consideration and advertisement of the Plan while the ongoing Metropolitan Region Scheme (MRS) Amendment 1388/57 to rezone the Plan area from 'Rural' to 'Urban' (Amendment) remains under consideration. This decision awaits the ultimate decisions of both the Ministers for Planning and for Environment.

14. With respect to environmental review processes, the Environmental Protection Authority's (EPA) report on the Amendment was delivered on 30 July 2025 (EPA Report).<sup>4</sup> This report, recommending that the Amendment can be implemented subject to conditions, is currently subject to review by the Appeals Convenor through a pending appeal lodged on 20 August 2025.

15. Notwithstanding the outcome of the environmental appeal, both Ministers retain their respective discretions to consider whether the Amendment can be implemented on environmentally acceptable conditions, and whether it should in fact be implemented at all.

16. It is not contentious that the Plan is predicated on the Amendment being implemented and the land being rezoned under the MRS to 'Urban'. No consideration is given in the Plan to the contrary. On this basis, it is submitted that it is not in the interest of orderly and proper planning, and is further inconsistent with the purposes of the PD Act to provide for an 'efficient and effective land use planning system', to allow the Plan to be advertised before a decision has even been made on whether to implement the Amendment.

<sup>4</sup> EPA Report 1788 Wattle Grove (July 2025) (EPA Report).

17. The Plan may only be 'prepared' if the WAPC considers it is required in that area for orderly and proper planning. The term 'required' indicates a high bar for accepting a structure plan in cases where the plan is not identified in the local scheme for urban use, nor required under a state planning policy. No reasons were given by the WAPC as to why it considered it was required, and it submitted that there are no justifiable reasons for such a conclusion.

18. The WAPC Letter makes it clear that the letter should not be taken as providing support for the Plan, and also that the WAPC will not make a decision on the Plan until the land is appropriately zoned under both the MRS and the City's local planning scheme. It is

submitted that it necessarily, and logically, follows that the City's advertising of the Plan, and its consideration of the Plan, should not have occurred (or occur) until a decision with respect to the Amendment has been made. Doing so effectively pre-empts an established process under the PD Act that has been designed to be undertaken prior to, and as a necessary precondition for, the preparation of structure plans. Whether a proponent wishes to invest in the preparation of such a plan before a decision on an MRS amendment is made is a matter for it, but this should not, and it is submitted cannot, influence the advertising and consideration of a structure plan by the City in the interests of orderly and proper planning.

19. The Plan's presumptive nature is further exemplified by its use of the words:5

Accordingly, the Structure Plan can be supported under the MRS Urban zone that is currently being implemented.

(Emphasis added)

20. The Amendment is currently being assessed through established statutory planning processes, and is not yet being 'implemented'. The statement raises a question as to whether the City is considering the Plan with sufficient objectivity, or whether its discretion will be unduly fettered in assessing and making a recommendation about the Plan.

21. The City has itself noted, on its 'engage' website which the Plan has been advertised, that the Plan is 'likely to be included on the agenda for the February 2026 Ordinary Council Meeting', presumably for the purposes of the City's final recommendation to the WAPC with respect to the Plan. It is respectfully submitted that the City should not make any recommendation to the WAPC prior to a decision being made with respect to the Amendment, and that further community and stakeholder consultation should occur with respect to the Plan between this decision being made and the City's recommendation to the WAPC being put forward.

5 Wattle Grove South - Local Structure Plan (Structure Plan), page 65.

22. It should be noted that [name] holds serious concerns as to the validity of the environmental process followed in relation to the Amendment. In [name]'s view, the WAPC unlawfully allowed the Proponent to itself prepare an Environmental Review Document (a key document relied upon by the EPA in coming to its decision to recommend that the Amendment could be approved). [name] also considers that the decision of the WAPC to classify the Amendment as being of a 'minor' nature for the purposes of the PD Act was erroneous in the context of the nature of the land, its environmental values, and what is broadly a highly significant and non-minor planning decision for the direction of development in the region.

Zoning and Use of Land

23. As previously set out, the Amendment proposes to rezone the Plan area from 'Rural' MRS zoning to 'Urban' zoning. The land is predominantly, and in line with the surrounding area, zoned as 'Rural Composite' under the City's 'Local Planning Scheme No 3' (LPS3).

24. The Plan significantly relies on the 'Perth and Peel @ 3.5million' (March 2018) frameworks, specifically the 'North-East Sub-regional Planning Framework' (March 2018) (Framework) which identified the majority of the Plan area as being an area for medium-long term (2022+) 'Urban Expansion'.

25. The Framework itself acknowledges that it has limitations, such as with respect to environmental considerations as exemplified below:6

Sites identified for development within the spatial plan may still contain environmental attributes that need to be identified, avoided and protected at subsequent stages of planning through a variety of mechanisms.

26. It is submitted that the Framework, which is now over seven years old, has been given too much weight by the Proponent as a basis for why the development envisaged in the Plan is, in a prima facie sense, acceptable. By focusing on the Framework, and additionally the City's 'Crystal Brook Concept Plan' (2020) (CBCP) and its 'Urban Landscape' classification for the majority of the Plan area, the Proponent has effectively tried to minimise the impact of what is ultimately a significant and consequential change of zoning and use with respect to land that has been zoned as 'Rural' and subject to similarly rural uses for decades.

27. [name] submits firstly, that significant consideration be given to the proposed change of zoning on a far broader basis than reliance on the Framework and CBCP. Secondly, in the context of the Plan, such consideration should be given to whether the development envisaged aligns with the type of 'Urban' development suitable for the area in any case.

6 Department of Planning Lands and Heritage/Western Australian Planning Commission, 'North-East Sub-regional Planning Framework' (March 2018), page 12.

[name] is strongly against the rezoning of the Plan area to 'Urban'. Separately from that objection, however, it should be clear to the City that any decision to implement the Amendment, and thus to rezone the land, should not consequentially result in the formulation of a view that the Plan should be recommended for approval. The further contents of this submission demonstrate that such an inference should not be made.

28. The CBCP was noted by Council at its meeting on 24 November 2020, but the decision was made to not pursue any further plans or studies on the basis, among others, that there were "a range of views on the future planning for the project area".<sup>7</sup> The CBCP itself clearly notes that:

This map is an indicative concept plan only and has no statutory weight. Any development will be required to follow normal statutory planning processes supported by relevant technical investigations and community consultation.

29. Furthermore, the CBCP Report notes the adopted objective of Council to 'reflect and acknowledge existing lifestyle and recreational opportunities of the area'. In [name]'s submission, the current Plan fatally fails to meet this objective in the CBCP.

30. In classifying the area as 'Urban Landscape', the CBCP did not make any suggestion that lots in the size contemplated in the Plan should comprise this landscape. Rather, the CBCP Report stated that:

Central to the Concept Plan is the idea of decentralised planning and landowner-led design. A consequence of this approach is that properties will be planned and developed individually through collaboration between landowners but without the prescriptive guidance of a conventional masterplan.

31. While the Plan purports to rely on the CBCP as a guide, its approach of splitting the area into six 'Planning Precincts', each with a pre-determined template for future development,<sup>8</sup> is inherently in conflict with the above-stated aim of the CBCP. The Plan acknowledges this, suggesting that a future developer will likely need to seek approval for the WAPC to amend the Plan (in the likely case they have a different proposal than set out in the Plan and wish to address any potential subdivision in a bespoke manner).<sup>9</sup>

32. In addition, the Plan is inconsistent with the objective of 'landowner-led design'. We understand that the Plan's proponent is not close to being even a majority landowner

within the Plan area. One other landowner owns approximately 17 ha and a multitude of other landowners exist, with no transparency or verification as to whether they have been adequately consulted or have any intention of supporting the proposal contained in the Plan.

7 City of Kalamunda, Ordinary Council Meeting Minutes (24 November 2020), page 45.

8 Structure Plan, page 36.

9 Structure Plan, page 8.

33. Accordingly, the Plan's actual reliance on and conformity with the CBCP is very limited, and, other than the Plan's general nature of providing from an 'Urban Landscape', the CBCP should have no further role in any decision as to whether the Plan should be recommended for approval by the City or approved by the WAPC.

#### Required Infrastructure and Services

34. With respect to required physical infrastructure and services, [name] notes, in relation to the Plan area, that:

(a) there is no reticulated gas supply within the site or generally within the immediately adjacent area; and

(b) the subject area is not currently serviced by a wastewater scheme.

35. It is submitted that there is a general lack of certainty as to the availability and timing of the above infrastructure/services. In its 2021 comments to the WAPC in relation to whether the Amendment should be initiated, the Water Corporation stated that:<sup>10</sup>

The subject land is remote from the sewerage network.

...

In accordance with the "Medium-Long Term" development timeframe in the North-East Sub Regional Planning Framework, funding for these works is outside the Corporation's 5-year Capital Investment Program.

36. The Plan notes that Water Corporation long-term planning shows the site ultimately being serviced via a gravity sewer extension, but notes that a Water Corporation scoping report for the delivery of an interim solution is currently being prepared.<sup>11</sup> Appendix G to the Plan, being its 'Local Water Management Strategy' does not materially address these concerns. There is no indication as to the extent that this interim solution would cover the entirety of the Plan area, or clarity provided as to its impact on the staging of development, other than the statement that 'providing the site with an internal reticulated sewer system will be achieved through the orderly development of the site'.<sup>12</sup>

37. Appendix H to the Plan constitutes a Transport Impact Assessment (TIA), and considers essentially whether the proposed 1646 dwellings can be supported by the local road network and, if so, how.<sup>13</sup>

<sup>10</sup> WAPC Meeting Agenda (27 October 2021), page 166.

<sup>11</sup> Structure Plan, page 56.

<sup>12</sup> Structure Plan 'Appendix G', Appendix O, page 13.

<sup>13</sup> Structure Plan 'Appendix H', page 81.

38. The TIA considers that 'to support the LSP, modifications to bus routes in the area should be investigated in collaboration with the PTA [Public Transport Authority]'.<sup>14</sup> In considering whether to initiate the Amendment in 2021, the WAPC received the following comments from the PTA who were against the Amendment on public transport grounds:<sup>15</sup>

Transperth advises that future residents have minimal or no public transport under current funding arrangements.

The amendment area will require an entire new bus route to be serviced with public transport, Transperth does not currently have funding or a timeline for such a route.

Transperth has approximately 50 bus network improvement projects requiring funding to provide public transport to new urban areas or have already been developed. This includes bus route extensions and new bus routes. It needs to be emphasised that many already developed urban areas on the Perth Metropolitan fringe currently lack access to public transport.

Transperth has an additional 200 Transperth bus network improvement projects that are unfunded.

39. The TIA notes some of these issues as raised by the PTA, but the only response has been to design a central 'Neighbourhood Connector' in the Plan to serve as a road that can accommodate buses. It is submitted that the inclusion in the Plan of this presently non-existent road does not address the fundamental concerns of PTA, ie that funding arrangements prohibit the establishment of a new bus route, and that insufficient work has gone into validating whether in 2025 the PTA's position in this regard has changed. If the Proponent has engaged with the PTA in this respect, the lack of inclusion of such information in the Plan possibly infers that this position has not changed.

40. The PTA had a number of further issues with the Amendment, and made a point of requesting that the Proponent contact it as early in the process as possible.<sup>16</sup> From the Plan, and from the TIA, it appears that limited consultation with the PTA has occurred to date. The extent of this consultation appears to be the authors of the TIA contacting the PTA to request confirmation as to whether any changes to bus routes are likely, to which a response was received they will very likely be no such changes.<sup>17</sup>

41. Given the essential nature of public transport to the Plan, and the numerous severe impacts that a failure to provide sufficient transport would have on future residents, it is submitted that this lack of certainty is not appropriate, and that the Plan should be refused. The current provision that 'ongoing consultation' will occur with the PTA to identify and formalise potential bus route alignments is,<sup>18</sup> in the context of the PTA's previous comments as to funding which are even noted in the Plan, an untenable position.

14 Structure Plan 'Appendix H', page 81.

15 WAPC Meeting Agenda (27 October 2021), pages 166-167.

16 WAPC Meeting Agenda (27 October 2021), page 167.

17 Structure Plan 'Appendix H', page 33.

18 Structure Plan, page 111.

#### B. ENVIRONMENTAL ISSUES

42. The Plan states that it has been designed to meet 'the Environmental Conditions for the Metropolitan Region Scheme Amendment Report', and refers to its Environmental Assessment Report in Appendix A.<sup>19</sup> These conditions are substantively derived from the EPA Report.<sup>20</sup>

43. It should be noted that there are inherent problems with the Plan's reliance on the EPA Report to inform its production. The final conditions on any approval of the Amendment are yet to be decided by the Minister for the Environment, in consultation with the Minister for Planning, and may well even before this time change pending the outcome of the current appeal of the EPA Report before the Appeals Convenor. As such, it is inefficient, inaccurate, and it is submitted misleading, for a proponent to prepare a structure plan reliant on unconfirmed potential environmental conditions.

Greater Brixton Street Wetlands

<p>44. Significantly, the EPA Report recommended at condition 3(4):21</p> <p>Avoid or where not practicable, minimise adverse impacts to the Greater Brixton Street Wetlands from urban development of the Amendment Area, including impacts to the wetlands' persistency, hydrological regime, water quality, ecological integrity and ecological function.</p> <p>45. The EPA Report further went on to note, in its 'other advice' section, that:</p> <p>The GBSW is recognised as one of the most important wetlands remaining on the SCP. The EPA reiterates the findings of its s.16j advice (EPA 2022) including:</p> <ul style="list-style-type: none"> <li>• the complexity and uncertainties of the hydrological processes sustaining the GBSW and</li> <li>• potential cumulative effects of development within the GBSW catchment.</li> </ul> <p>The EPA notes that at this MRS level of the planning process, the staging of urban development is not able to be confirmed but will be addressed at structure planning.</p> <p>46. While the Plan and its Appendix A consider the potential impacts to the Greater Brixton Street Wetlands (GBSW),<sup>22</sup> no further studies since the publication of the EPA Report in July 2025 appear to have informed the Plan.</p> <p>19 Structure Plan, page 9.  20 Structure Plan, page 9.  21 EPA Report, page 40.  22 Structure Plan, page 9; Structure Plan Appendix A, pages 27-63.</p> <p>47. Furthermore, there appears to be some reliance and/or expectation in the EPA Report that the staging of urban development will be identified at the time of structure planning. It is submitted that this has manifestly not occurred, and accordingly that the uncertainties of impacts and cumulative effects of development within the GBSW catchment not addressed.</p> <p>48. The Plan only states in broad terms that staged development is anticipated to begin from the south-western portions of the site from 2026, and that development is expected to be at a rate of 'approximately 100-150 lots per year' and with 40-60 lots per stage (all subject to market demand).<sup>23</sup></p> <p>49. It is submitted that this lack of clarity is exactly the issue that the EPA was referring to in the EPA Report, and which is envisaged would be addressed through the Plan. This has not occurred.</p> <p>Environmentally Sensitive Areas</p> <p>50. There are currently eight Environmentally Sensitive Areas (ESAs) in the Plan area, as acknowledged by the Plan,<sup>24</sup> and declared pursuant to 51B of the Environmental Protection Act 1986 (WA) (EP Act). The impact of ESAs is that clearing native vegetation in these areas will be unauthorised without the requisite approvals.</p> <p>51. As well as referencing an incorrect section of the EP Act, the Plan states that:</p>		
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<p>Many of the ESAs mapped within the site are associated with the locations of declared rare flora, however based on surveys undertaken by AECOM (2020) many of these areas have been historically cleared and the Threatened flora associated with the ESA boundary are no longer present. Accordingly, the corresponding ESAs are no longer considered to be applicable.</p> <p>52. It is submitted that the above assertion that the ESAs are 'no longer considered to be applicable' is erroneous and misleading. The fact is that the ESAs have been declared pursuant to the EP Act and remain in force. Should the findings of the referenced AECOM surveys be found to currently support such that any or all of the ESAs are not applicable, the Proponent should seek to liaise with DWER to remove these classifications where appropriate.</p> <p>Visual Amenity and Consultation</p> <p>53. The Plan considers impacts to the EPA's environmental factor of 'Social Surroundings' in Appendix A, particularly with reference to 'visual amenity associated with the natural and semi-rural character of the area', the social value of the GBSW, and Aboriginal heritage</p> <p>23 Structure Plan, pages 11, 116. 24 Structure Plan, page 52.</p> <p>sites (to be further considered).<sup>25</sup></p> <p>54. Of particular relevance is the EPA's 'Environmental Factor Guideline – Social Surroundings' which notes the following consideration:<sup>26</sup></p> <p>the aesthetic, cultural, economic and/or social values which may be impacted, and whether those values are significant</p> <p>55. The Plan notes the potential impacts to 'the rural look and feel of Crystal Brook Road evolving into a more urban aesthetic, as a result of new urban development'.<sup>27</sup> It is submitted that the Plan's consideration of amenity impacts being primarily limited to Crystal Brook Road is insufficient in light of the EPA's relevant guidelines. It is the impact of the broader development of the area as directly influenced by the Plan that should have been considered.</p> <p>56. Appendix A of the Plan refers to a previous document prepared by EPCAD entitled 'Wattle Grove – Visual Landscape Evaluation' (EPCAD 2024) as being the basis for its evaluation of visual amenity.<sup>28</sup> This document was submitted by the Proponent in support of the Amendment.</p> <p>57. It is submitted that the community consultation expressed in EPCAD 2024 is insufficient to appropriately inform the City and the WAPC with respect to the amenity concerns of residents in and around the Plan area. Not only was the consultation performed in this study limited to the issue of rezoning the land to 'Urban', and not attitudes towards the specific Plan in question, but the essence of the conclusion was reached in EPCAD 2024 was that those who opposed the change in zoning would either accept the decision and sell their properties, or for a variety of reasons (including death) otherwise move out of the area 'before they experience any significant impacts to their visual amenity and experience of the local landscape'.<sup>29</sup></p> <p>58. Consultation with the community in the formulation of the Plan appears to be materially disregarded, with the community not being referenced in the 'Stakeholder Engagement' section of the Plan.<sup>30</sup></p>		
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	<p>59. Accordingly, it is submitted that the Plan has inadequately considered the issue of amenity impacts to the existing community in and around the Plan area, and has</p> <p>25 Structure Plan Appendix A, pages 122-129.  26 Environmental Protection Authority, 'Environmental Factor Guideline - Social Surroundings' (November 2023), page 2.  27 Structure Plan Appendix A, page 128.  28 Structure Plan Appendix A, page 122; EPCAD, 'Wattle Grove – Visual Landscape Evaluation' (28 February 2024) (EPCAD 2024), available at <a href="https://www.epa.wa.gov.au/sites/default/files/Schemes/Appendix%20I%20Visual%20Landscape%20Evaluation.pdf">https://www.epa.wa.gov.au/sites/default/files/Schemes/Appendix%20I%20Visual%20Landscape%20Evaluation.pdf</a>.  29 EPCAD 2024, pages 94-95.  30 Structure Plan, pages 87-89.</p> <p>essentially failed to undertake any meaningful consultation to incorporate appropriate mitigation measures into the Plan.</p> <p>60. This failure to consult extends to a broad range of amenity and 'social value' impacts, for example the impact of a roughly 100% increase in traffic volumes along Crystal Brook Road.<sup>31</sup> It is thus submitted that the Plan's documentation of merely one, visual amenity related, impact is incomplete, and that even with respect to this impact consultation has been insufficient.</p> <p>Aboriginal Cultural Heritage</p> <p>61. The Plan notes the following two relevant Aboriginal cultural heritage sites as identified by the Department of Planning, Lands and Heritage:<sup>32</sup></p> <p>(a) ID 4343 Brentwood Road Swamp (Located Within the Plan area); and  (b) ID 4342 Brentwood Road Quarry. (Located Outside the Plan area).</p> <p>62. The Plan clearly provides for urban development in the area of site ID 4343, and considers that section 18 consents under the Aboriginal Heritage Act 1972 (WA) will need to be sought for the destruction of Aboriginal cultural heritage.<sup>33</sup></p> <p>63. [name] considers this to be an unacceptable approach. The Proponent had ample opportunity to design the Plan in such a manner as to entirely avoid site ID 4343, and thus secure a scenario where no damage or losses to Aboriginal cultural heritage was suffered. Instead, it has placed development squarely within the area of site ID 4343.</p> <p>64. [name] submits that the Plan's impact real and significant on Aboriginal cultural heritage is one of a number of reasons why it should not be recommended for approval/approved in its current form (in the event that the Amendment is successful and the land is rezoned).</p>		
68	<p><i>**Note</i>  <i>This submission included several pieces of historical correspondence. These have been reviewed, but not included as the City has not been able to verify them all.</i></p> <p>Thank you for the opportunity to share our values in regard to Wattle Grove South, Local Structure Plan August 2025 I 20-119 / Element Part of LSP. Precinct A.  Wattle Grove (South)Precinct A encompasses an area bounded by Welshpool Road East, Brentwood Road and Tonkin Highway on the outside boundaries, and primarily, by the inner parcel of land is contained by Boundary Road,</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Business impact (Precinct A)</li> <li>- Design concerns (road layout)</li> </ul>	Noted.

<p>Welshpool Road East, Brentwood Road and Tonkin Highway on inner perimeter roads, Boundary Road being the gazetted road that is bitumen sealed and curbed at its Welshpool Road East, T Junction, and bitumen sealed and mountable curbed at its cul-de- sac end, making it a worthy and practical asset ,the dedicated filter-lane on Welshpool Road East promotes safety ,not only for Boundary Road users but also for traffic making necessary U-turns at the T junction.</p> <p>Noted on page 107 of the LSP the mention of Boundary Road in this preliminary minor amendment suggests the closure of a gazetted road, may I respectfully request that I be kept informed of any progressive decisions regarding this road, in the anticipation it remains open for the future safety and common good.</p> <p>Boundary Road and Brentwood Road, by formation hold the key prospect for the creation of internal road design, for Precinct A.</p> <p>Attached is a bound copy of correspondence to the City of Kalamunda dated 11 August 2023, re retaining the gazetted rd, Boundary Road, together with City of Kalamunda reply dated 30th August 2023, for your perusal.</p> <p>Also attached is a bound copy of correspondence to the City of Kalamunda dated 23 August 2018, re City of Kalamunda Draft Industrial Development Strategy; Wattle Grove South Feasibility Study. Council s offer of compensation dated 23 February 1987 for 30 metres of land to be acquired from Lot 146 ( 721 ) Welshpool Road frontage, for the widening of that road reserve in association with the construction of the dual carriageway was accepted, thereby assessment reduced the opportunity of subdivision of the remaining parcel of land on Lot 146 (721) from four subdivisional to three subdivisional lots. (attached)</p> <p>Main Roads Email dated 6 September 2023 from Carolyn Walker, Stakeholder and Community Engagement Consultant Main Roads, Strategic Communications/Strategic and Communications Directorate, says, As discussed on the phone - the left and right access from Boundary Road to Welshpool Road East will be retained. (copy enclosed) On the 9th of August 2023 I wrote to City of Kalamunda re Boundary Road remaining an open gazetted road. Also correspondence dated 30 August 2023, following a phone conversation that day with Mr Tony Padvano, to Element Advisory P/T/Hesperia Projects P/L ATF Wattle Grove Trust, in which i expressed the relevance Boundary Road has to contribute, and requested that it remain open, as a gazetted road.(copy attached)</p> <p>Reference is drawn to City of Kalamunda, Public Agenda Briefing Forum 10 August 2021, /10.1.4. Wattle Grove- Proposed Metropolitan Region Scheme Amendment - Western Australian Planning Commission Request for Preliminary Comment (Applicant; Element Advisory Pty Ltd/ Hesperia Pty Ltd ATF Wattle Grove Trust) Item 57-The following conclusions were made to the proposed MRS amendment: a) An analysis of expected daily traffic volumes on the external road network indicates that: 1. Welshpool Road East, between Tonkin Highway and Crystal Brook Road, will increase to over 30,000 vehicles per day. This can be accommodated within the existing road layout, but will require intersection upgrades (copy enclosed)</p> <p>I have been very fortunate to have been a full time resident ratepayer of the then Shire of Kalamunda now City of Kalamunda for more than 50 consecutive years, during a majority of that time I have been an active member of our community holding various office bearing responsibilities within, Wattle Grove Residents Association, Lesmurdie Ratepayers Association then to become Lesmurdie and Districts Ratepayers Association, Main Roads invitation to Community Liaison Group during the Gateway project, have attended many Shire and City facilitated programs, workshops and community groups.</p> <p>To date several Precinct A Landowner (PAL) group meetings which we attend, have shown agreement to the proposed LSP with some changes which include preferred zoning that would include and retain the" Composite" aspect of a primarily "Enterprise Area", mixed uses, service industry and light industry, my Son, Brendan and I preferred a zoning that is to remain "Composite" within the Enterprise Area, which helps the residential/ business balance within the urban profile while providing employment opportunities within the City of Kalamunda.</p>	<p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	
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	<p>Precinct A has its drawbacks where urban zoning is considered due to noise zones, potential or realized in the vicinity of dog boarding kennels, projected increase of road traffic noise and actual and projected Perth Airport noise levels.</p> <p>Representing the majority landowner group of Precinct A, Urban Planner, Simon O'Hara, Statewest Planning, has been engaged to meet with City of Kalamunda Planning Offices to further our group submission on the LSP.</p>		
69	<p>I am writing to formally raise my concerns and objection to the proposal to rezone around 126 hectares of the Wattle Grove foothills. This proposed rezoning under the Metropolitan Region Planning Scheme (MRS) would see the current rural zoning amended to allow for high density residential housing development.</p> <p>My partner purchased in his home here after growing up in the area and enjoying the semi-rural lifestyle that this area currently affords our family and many other is this area, we love seeing the local wildlife that frequents our property including but not limited to the Quendas, Red-Tailed Black Cockatoos, Western Grey Kangaroos. As a proud noongar woman seeing the wildlife that frequents this area brings me much joy and connection to country.</p> <p>My partner and I were devastated recently to witness the underhanded removal of around 17 native and endangered <i>Corymbia calophylla</i> – <i>Kingia australis</i> grass trees some of which would have been up to 400 years old. This move by the developer Hesperia Pty Ltd, whilst the area was still under EPA review to assess the impact of rezoning and development to the area, shows their complete lack of respect for this land, and the processes that are supposed to be in place to protect it.</p> <p>The City of Kalamunda's own website claims "<i>Surrounded by nature and fuelled by creative energy, Kalamunda is a flourishing city with a remarkable mix of culture, nature and family.</i>" whilst also acknowledging the traditional owners of this land the "Whadjuk Noongar People" many of whom continue to reside in the area and yet you allow proposal like this to gain traction and momentum by greedy developers despite much objection over the years by the local residents. It seems to me that the City of Kalamunda is not interested in looking after this land or it's people and it's words of acknowledgment to my people are just token gestures.</p> <p>The City of Kalamunda only appears to be interested in lining their own pockets and the people are taking notice, more importantly as custodians of this land my people are taking notice of the lack of care for country and its people by this government.</p> <p>Further concerns with the proposal as it stands are listed below;</p> <ul style="list-style-type: none"> <li>• The WA Planning Commission (WAPC) allowing the private developer (Hesperia Pty Ltd), who hold a vested interest in the approval of this rezoning amendment, to submit its own environmental assessment without arranging for an independent and unbiased environmental assessment report is beyond culpable and calls into question the integrity of the entire process.</li> <li>• A deeper inspection of this proposal finds contradictions to the principals of community wellbeing, environmental conservation and good governance as expressed in the State Planning Framework's - State Planning Strategy 2050.</li> <li>• The current planning frameworks along with the Department of Planning's own Urban Monitor Records indicate a substantial surplus in land that is currently allocated for urban development in Perth, these records reveal that it could take up to 62 years to completely develop.</li> </ul>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concerns</li> <li>- Traditional owner concerns</li> <li>- Procedural concerns</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Wattle Grove South has long been earmarked by the State Government for urban development. The area is identified within both the Western Australian Planning Commission (WAPC) Perth and Peel @3.5Million Sub-Regional Planning Framework (WAPC, 2018).</p> <p>The project will implement urban (primarily residential) development consistent with the site's designation for urban expansion under the framework and follows the Metropolitan Region Scheme 'Urban' rezoning proposal (MRS 1388/57). Please refer to previous response regarding EPA assessment and recommendations to Minister for Environment, and planning processes and approvals to follow regarding MRS amendment, concurrent LPS 3 amendment and Local Structure Plan. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. The documentation prepared as part of the structure plan, including the Bushfire Management Plan, is in accordance with State and local government requirements. Regarding the removal of trees, to Hesperia's knowledge nothing has been removed by Hesperia or it's contractors. Hesperia suspects that this may have potentially been a state service provider or by the current landowners of land not yet owned by Hesperia.</p>

- The treatment of this proposal as minor amendment, when the proposed development is at a scale of over 1,000 new dwellings, a substantial increase from the 77 existing dwellings along with the substantial infrastructure requirements show that this amendment is anything but minor.
- The Urban Growth Monitor 11 report by the Western Australian Government, emphasises the serious environmental costs of urbanisation including the creation of urban heat islands, climate change impacts, accelerated loss of biodiversity and deterioration of air and water quality.
- The Foothills Structure Plan, outlines the historical protection status of the Foothills rural land protecting this area which includes rural areas along the Welshpool Road East from more intensive development since 1992, and was confirmed by the Department of Planning Lands and Heritage (DPLH) in 2019.
- The 2015 draft that initially preserved Wattle Grove South's rural status, aligning with both the MRS and Foothills Structure Plans, was altered at the then Shire of Kalamunda's request, without community consultation. Raising yet again serious historical procedural concerns that the City of Kalamunda, knowingly silences or leaves out the communities directly impacted by these significant proposed changes out of the consultation process, paving the way for greedy developers and the City of Kalamunda to profit at the back of the community at its mercy.
- Omissions of crucial policies from the amendment report, including the State Planning Policy 3.7 - Bushfire and Planning for Bushfire Guidelines is ill-considered and negligent when the proposed amendment leads to a significant increase in population and vehicle traffic, severely impacting emergency response times in an area where the only evacuation route (Crystal Brook Road) is tree-lined and vulnerable to blockage from fire and or fallen trees.
- The continual disregard for community input, infringes upon basic democratic principles in planning. When the community so strongly opposes as has been demonstrated through multiple formal rejections with; 97% of property owners opposed to industrial rezoning, 75% rejecting urban rezoning proposals, 145 submissions opposing the advertised Crystal Brook Urban Concept Plan against 2 supporting submissions and 797 residents formally petitioning against the urban concept plan.

It is clear and obvious that despite the resounding opposition by the community that the City of Kalamunda have failed their rate payers and the broader community by continually ignoring their opposition of this proposal and should the WAPC, who are bound by legal and ethical obligations to honour community perspectives, approve this proposed amendment they would be disregarding documented community opposition and setting a dangerous precedent for bypassing democratic planning processes.

With this kind of behaviour from our policy makers and government departments I cannot and will not stay silent, I **STRONGLY OBJECT TO THE PROPOSED WATTLE GROVE SOUTH STRUCTURE PLAN AND THE NON WAPC APPROVED MRS AMENDMENT 1388/57 REPORT AND ENVIRONMENTAL REVIEW** as outlined above.

Furthermore, I also note EcoVision's Executive Summary submitted to the City of Kalamunda on 3<sup>rd</sup> November 2025.

EcoVision who represent more than 200 residents of the Wattle Grove South and surrounding areas, strongly object to the purported Wattle Grove South Structure Plan (WGSSP).

Given the proposal is prematurely advanced, arguably unlawful, and incapable of having statutory effect. It seeks to facilitate urban development on land that remains zoned Rural under both:

- the Metropolitan Region Scheme (MRS); and
  - the City of Kalamunda Local Planning Scheme No. 3 (LPS 3).
- Crucially:
- MRS Amendment 1388/57 has not been approved or gazetted by the WAPC;

	<ul style="list-style-type: none"> <li>the proposal area remains subject to a live formal EPA assessment; and</li> <li>the WAPC has not directed nor authorised preparation or advertising of a structure plan.</li> </ul> <p>Proper planning requires that strategic rezoning and environmental approval precede any urban structure plan. Instead, the WGSSP assumes an urban outcome first and seeks to justify it after the fact — reversing statutory planning logic and breaching orderly and proper planning principles. Further, section 41 of the Environmental Protection Act 1986 prohibits a decision-making authority from making or implementing a decision that could allow a proposal to be implemented while it is under assessment by the EPA. Advertising or progressing a structure plan during a live EPA assessment arguably risks constituting such a prohibited decision, as it materially advances a proposal with clear potential for significant environmental impact.</p> <p>Accordingly, the WGSSP lacks lawful foundation and should not be progressed, advertised, endorsed, or relied upon.</p> <p><b>Key Defects</b></p> <ul style="list-style-type: none"> <li>Statutory invalidity &amp; denial of procedural fairness to affected rural landowners.</li> <li>Irreversible environmental loss, including native Banksia woodlands, Corymbia calophylla – Kingia australis communities, and habitat for threatened black cockatoos, with hydrological risks to the nearby internationally-recognised Greater Brixton Street Wetlands.</li> <li>Unacceptable social, financial and amenity impacts, including coerced land aggregation, development-cost burdens, and a fivefold increase in vehicle movements on local roads without funded upgrades.</li> <li>Governance and public-trust concerns, including perceived regulatory capture and administrative advancement of a private development agenda without lawful authority.</li> <li>Lack of community mandate, with the original urban concept plan upon which the WGSSP is based having been overwhelmingly rejected by residents (145 written objections, only two in support) - yet subsequently altered by the City administration without re-consultation.</li> </ul> <p><b>Requested Determination EcoVision respectfully requests that the City and Council:</b></p> <ul style="list-style-type: none"> <li>formally decline to endorse or advance the WGSSP;</li> <li>advise the WAPC that the proposal is premature, lacks statutory basis, and is inconsistent with orderly and proper planning; and uphold the current Rural zoning and the significant environmental, rural amenity and community values of Wattle Grove South.</li> </ul> <p><b>In summary The WGSSP:</b></p> <ul style="list-style-type: none"> <li>rests on no lawful statutory foundation;</li> <li>is proceeding during a live EPA assessment in apparent breach of environmental law principles;</li> <li>risks significant, irreversible environmental harm;</li> <li>imposes unacceptable burdens on unwilling rural landowners;</li> <li>and lacks any genuine community mandate.</li> </ul> <p>For these reasons, Council should decline to endorse or progress the purported WGSSP and notify the WAPC accordingly.</p>		
70	<p>Comment only - Make the development like Bushmead. Retention of Bushland and connection of green spaces. Don't be greedy and make the blocks very small ie 300-400m2 and of high density. Keep the foothills identity of space and not packed like Victoria Park.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>Comment</li> <li>Density concerns</li> <li>Character impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the draft Plan's consideration of lot sizes.</p>	<p>Comments noted. The design and implementation approach of the Structure Plan is led heavily by the Landscape Master Plan. The Landscape Master Plan is predicated around retaining as much 'landscape-led' ecological benefit within the site as possible, referencing previous land use, its foothills location and creating a new sense of place. Tree retention and canopy tree planting is an ongoing commitment that shall occur between a proponent and the City of Kalamunda during each stage of development of the relevant Planning Precinct.</p>
71	<p>Object - Our family strongly opposes the rezoning of Wattle Grove South. We enjoy the lifestyle here and do not want the area turned into suburbia with high density housing. There are numerous trees on our block and on our neighbours' blocks that red-tailed black cockatoos use to roost each night. The majority of the local community has expressed strong opposition to this development and so please heed our wishes by NOT supporting this</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>Objection</li> <li>Perception of community objection</li> </ul>	<p>The proposal considers: – Protection and management of conservation of Threatened Ecological Communities and significant flora and fauna within Conservation areas through the</p>

	rezoning and development. Maintaining the tree canopy should be a high priority for the City of Kalamunda which is fast 'developing' a reputation for environmental destruction. Further, expert environmental reviews that have been submitted to your office have spoken against development of this area.	<ul style="list-style-type: none"> <li>- Amenity impact</li> <li>- Environmental impact (tree canopy)</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	Conservation Area Management Strategy (CAMS), which will guide future Conservation Area Management Plans (CAMPs) for each Conservation Area. – Tree canopy retention (including black cockatoo potential nesting trees) within the urban development through the Tree Canopy Retention and Landscaping Management Plan (TCRLMP). – Maintenance of hydrological regimes and likely improvement in water quality via the Local Water Management Strategy, which will guide future Urban Water Management Plans (UWMPs). – Preservation of cultural heritage and visual amenity. – Sustainable urban development which minimises its environmental impact within the site and the nearby Greater Brixton Street Wetlands.
72	Support – More urban required	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul>	Comment of support noted.
73	Object - The roads cannot the traffic already after the abomination the shire approved the Roe Hwy logistics park. This shire should be ashamed how improving infrastructure first like deep sewerage through Lesmurdie!	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic concerns</li> <li>- Infrastructure concerns (reticulated sewer in Lesmurdie)</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips.
74	Comment only - The report states that the Welshpool Road/ Tonkin Hwy intersection can accommodate the extra traffic; however it struggles with the existing level of traffic and is always banked up in the mornings and afternoons. Also, the intersection at the top of Crystal Brook road and Welshpool Road is dangerous and in its current state cannot accept more cars. How will this be addressed?	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding traffic impact of the draft Plan.</p>	<p>The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips. The Structure Plan's Transport Impact Assessment recommends to the City of Kalamunda and Main Roads WA that the Welshpool Road East / Crystal Brook Road / Brentwood Road intersection be upgraded</p> <p>to a four-way roundabout configuration to accommodate the project traffic volumes in the full build-out year 2040 scenario.</p>
75	<p>Object - I object to the ongoing Government human population Ponzi scheme.</p> <p>I object to the ongoing destruction of native animal habitat and the compromise of the welfare of native animals that occurs because of the ongoing Government human population Ponzi scheme; and there will be thousands more people that I have to live next door to.</p> <p>This plan goes against everything that I support and agree with, and there is no benefit to me.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concerns</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul>	Please refer to previous responses regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological

	There are already too many people in this area. I strongly object to native wildlife and environmental destruction.	Please refer to body of the report for detailed discussion regarding these concerns and impacts.	linkages between the proposed conservation areas.
76	Object - I strongly disagree with this development plan, as this causes more traffic, pollution and harm to nature. This includes a disruption in rural lifestyle.  Although, I disagree with the development, if you are going ahead with the development, please consider developing both sides of the Crystal Brook road (between Crystal Brook Road and Welshpool Road East). Allow subdivision for 2000 square meter lots.	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> <li>- Procedural concerns</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> Please refer to body of the report for detailed discussion regarding these concerns and impacts.	Comments noted. The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips.
77	Comment only - Supportive if the subdivision is R20. Don't support smaller lots as this will increase congestion and many other issues for the current residents	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Comment</li> <li>- Density concerns</li> <li>- Traffic impact</li> </ul> Please refer to body of the report for detailed discussion regarding these concerns and impacts.	The Structure Plan makes provision for a range of residential densities, including R20, and shall also accommodate existing homestead lots.
78	Object – 1 Why have I only 2 days to read, understand and comment ?? 2 This is huge! Just leave it as is ... 3 I grew up in this area . Went to the original Primary School. I was a 'bush kid' in the 1950's and know the area well. Just give it back to NATURE please.	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Objection</li> <li>- Character impact</li> <li>- Environmental impact</li> </ul> Please refer to body of the report for detailed discussion regarding these concerns and impacts.	Comments noted.
79	Support - We are the owners of [address], Wattle Grove and we have lived at the property for over 22 years and fully support the proposed Structure Plan for Wattle Grove South. The planning for this location is a long time coming and will provide much needed residential land supply in the locality. The proposed structure plan looks logical, providing good road connection and areas of public open space. The Structure Plan is close to new and exciting industrial areas. We also support the retention of conservation areas and native trees where possible to preserve the rural feel of the area.	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Support</li> <li>- Logical design</li> <li>- Conservation</li> </ul> Please refer to body of the report for detailed discussion regarding these elements of the draft Plan.	Comments noted.

80	Object - If this process is not objected now, it will soon encroach our property. More housing land needed, but other areas better suited to development in the City first.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Not a suitable area for growth</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the planning merits and framework which has resulting in submission of the draft Plan.</p>	Comments noted. Strategic planning for the area has been progressing for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore the logical next step for the ongoing planning for this particular area.
81	Support - While live just outside the area. I support the proposal on the basis that there is a burgeoning need for dwellings in the area & this land presents as a reasonable and flexible option to accommodate dwellings and help address the shortfall. Having had family recently sell & buy in the city, the chronic undersupply is very evident.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Responds to current need for more houses</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	Comment noted.
82	Concerns for traffic is very high as Crystal brook rd is already used as thoroughfare from Maddington direction to Forrestfield via Kelvin. There is also application for retirement village with 190 units on Gavour rd although has access from Welshpool rd I am sure if it goes ahead retirees will choose a quieter exit via Gavour rd. I also do not support Gavour rd development for same reasons.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding traffic impact of the draft Plan.</p>	Comments noted. The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips.
83	Object - This is a deliberate and disgusting project! The area has already been described as fragile, This area has already been slated by the Water Corporation as dangerous for development due to the environmental conditions. Kelvin Road, Crystal Brook Roads are incapable of safely handling the massive increase of traffic. Welshpool Road East is incapable of handling the extra traffic! Tonkin Hwy/Welshpool Rd East intersection is already at heavily congested status. There are massive safety issues not being taken into consideration with this shortsighted, greedy, environmentally insensitive proposal!	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	Unaware of Water Corporation making comments as claimed. The project will introduce reticulated sewer lines, which will actually improve upon on the current situation where the on-site sewerage storage systems are at risk of contaminating the environment. The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips.
84	Support - We support the advertised Structure Plan for Wattle Grove South as we are the owners of the above property to be affected and have lived here for 70 yrs and 45 yrs respectively. As the proposed Structure Plan provides parks, conservation areas, logical road network and central primary school site and also supports the retention of trees where possible which retains the foothills rural feel, we are planning to stay residing in this area. There also will be opportunities for local businesses and jobs for new residents as this area is close to industrial areas ie Kenwick and Maddington.	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Logical design</li> <li>- Tree retention</li> </ul>	Comments of support noted.

		Please refer to body of the report for detailed discussion regarding these elements of the draft Plan.	
85	Support - Our family has lived in [address] since 1951. In that time we have seen change and it is time to look to the future	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Support</li> <li>- Looking to the future</li> </ul> Please refer to body of the report for detailed discussion regarding these elements of the draft Plan.	Comments of support noted.
86	Support - Yes I support this , I would also like the same thing done in the Pickering Brook Area	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Support</li> <li>- Same approach for Pickering Brook</li> </ul>	Comments of support noted.
87	Object - The proposed plan will ultimately remove businesses that residents in the immediate area and broader Kalamunda shire rely on. Namely RM smith and Sons stockfeeds.  In addition the traffic congestion is already problematic on Welshpool Rd East at both crystal brook Rd and Tonkin Hwy intersection, increased residential properties and the addition of a school will only exacerbate what is already dangerous traffic conditions.	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Objection</li> <li>- Business impact</li> <li>- Traffic Impact</li> </ul> Please refer to body of the report for detailed discussion regarding these impacts.	Comments noted. The proposal will not force existing businesses to relocate. They can remain should they decide to. There will be the ability for businesses in Precinct A to remain should wish to. The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips.
88	Object - Please record my submission as I do not support, in fact I strongly oppose the Wattle Grove Structure Plan that is currently out for comment on your engage Kalamunda page. This rural area is the lungs of Perth and has significant environmental attributes for Perth. It's natural function protects our climate. It supports wildlife, flora and fauna much of which is already endangered. More tree canopy loss and clearing of land in this area will be detrimental to our environment and cannot continue to fall on deaf ears. It is significant and it is real. We have already lost too much tree canopy, wildlife, flora and fauna. It needs to stop here to protect this beautiful ecosystem and part of Perth which local residents of the hills and foothills love, and is why we choose to live here. Previous community consultation has provided enough data and evidence that the majority of people do not support urban development and the significant negative impact this would cause. This area must remain rural. Thank you for your time.	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> Please refer to body of the report for detailed discussion regarding these concerns and impacts.	The proposal is proactively undertaking initiatives to protect and manage the conservation of Threatened Ecological Communities and significant flora and fauna within Conservation areas through the Conservation Area Management Strategy (CAMS), which will guide future Conservation Area Management Plans (CAMPs) for each Conservation Area. Tree canopy retention (including black cockatoo potential nesting trees) will occur within the urban development through the Tree Canopy Retention and Landscaping Management Plan (TCRLMP).
89	Support - My input into the LSP assessment for Wattle Grove South. Specifically the Future of Precinct A. When families invest their lives in establishing businesses they ask little of Government Agencies, other than they don't hinder! They don't seek subsidies granted to massive internationals. They get on with it! The last thing they want of government is to take away their livelihood and hence security of multigenerational businesses into perpetuity. Under what is proposed for Precinct 5 that security is threatened. By rezoning Precinct 5 to Urban residential that is exactly what is proposed within the draft submitted LSP? The businesses that will be affected if this is accepted are not enormous or multinational businesses that can engage top rating legal teams to protect their assets. They are the remnants of those that have disappeared from Wattle Grove South area over the past 50 years. Encouraged by what they perceived would allow them to operate into perpetuity i.e. the rezoning of Precinct A to	The Administration notes the submission and themes of <ul style="list-style-type: none"> <li>- Support</li> <li>- Business impact</li> <li>- Design change to add light industry</li> </ul>	Comment of general endorsement noted. The suggested modified 'Light Industry' zone in other submissions (notionally called an 'Enterprise Area') for Precinct A has merit. It is agreed that this would enable growth of the current businesses and establishment of other businesses. We do not object to this being further investigated by the landowners of Precinct A and represented as an opportunity in the structure plan.

	<p>Rural Composite decades ago, they are viable businesses. Now with WAPC and Kalamunda Council advising they wish to “do away with composite” interlocking with a developers’ aspirations, one asks “What is the future for these businesses? Is it hang around and await the next whims of a private developer as to how and when they will be replaced by houses? This is not democracy!</p> <p>The services these businesses provide are, and will continue to be, used (particularly by new home owners in the adjacent areas) and they include:- All landscape requirements and more:- Soil and Landscape yard Tree and Tree management Turf and all ancillaries to install and manage Pet and Stock supplies What more could you ask but to have these services close at hand? I ask those who make the decisions on zoning to protect the future of these businesses by zoning Precinct 5 Light Industrial – with modifications as to certain usages not being allowed. EG. One that should be included is self-storage which for those residing in the future space restricted accommodation allows them to have the benefits that come from not having to store their boats, caravans and other assets halfway across town. I ask “Why is it in planning we have to tick categories of boxes designated over half a century ago?” Can we not have Light Industrial Category A, B, C, etc.? I ask Council to form a committee made up of PAL, Council and whoever you feel should be included – and that doesn’t include ratepayers outside Precinct 5 that live in Jamaica and own a block in Gooseberry Hill. As for my position on what is proposed for other Precincts I have no input – it’s up to those people that live in them to put forward what they want. Generally I endorse the overall development.</p>	<p>Please refer to body of the report for detailed discussion regarding these and impacts and potential for the land use designations of the draft Plan to be modified.</p>	
90	<p>Support - I am totally for the development of Wattle Grove Area. Most people in the area are using this development as there Superannuation.</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul>	<p>Comment of support noted.</p>
91	<p>Object - Don’t do it</p>	<p>The Administration notes the submission and theme of</p> <ul style="list-style-type: none"> <li>- Objection</li> </ul>	<p>Comment noted.</p>
92	<p>Object - Id like to register my opposition to the proposed Wattle Grove South Structure Plan (WGSSP). The proposal is premature, lacks lawful foundation, and is incapable of having statutory effect. It seeks to facilitate urban development on land that remains zoned Rural under both the Metropolitan Region Scheme (MRS) and the City of Kalamunda Local Planning Scheme No. 3 (LPS 3). Crucially, the Metropolitan Region Scheme Amendment 1388/57 has not been approved or gazetted; the WAPC has not authorised the preparation or advertising of any structure plan; and the proposal area remains subject to a live EPA assessment. Proper planning sequence requires rezoning and environmental approval before it can be submitted.</p> <p>Under s.2.10 of the Local Government Act 1995, councillors must act with care, diligence, integrity and in the public interest. Advancing a premature, unlawful, or misleading planning proposal exposes the City to findings of maladministration and undermines public confidence in planning processes.</p> <p>Indicators of perceived regulatory capture include advancement of an urbanisation agenda ahead of statutory preconditions, reliance on proponent-led assumptions, limited disclosure to landowners, and administrative actions suggesting inevitability despite unresolved environmental and statutory matters.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Procedural concerns</li> </ul> <p>Please refer to body of the report for detailed discussion regarding the legality of the submission and consideration of the draft Plan.</p>	<p>The draft structure plan can still be progressed concurrently with the Metropolitan Region Scheme (MRS) amendment. The parallel assessment of the structure plan with the MRS amendment provides a distinct benefit for agency assessors and the community by providing another level of detail, resulting in a more informed proposal. The structure plan is therefore deemed necessary for the purposes of orderly and proper planning.</p>
93	<p>Object - This council seems hell bent on turning any land at the bottom of the hill into a sea of rooftops. How about you leave us some open spaces, larger blocks and the free end open feel we love?</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concerns</li> <li>- Amenity impact</li> </ul>	<p>Comments noted. The Structure Plan, through the Landscape Masterplan and Tree Retention and Canopy Strategy, facilitates urban development in a manner that protects and supports the growth of existing trees. It prioritises the retention of trees identified as having a high worthiness of retention within the public realm; open spaces and streetscape. It also supports the planting of</p>

		Please refer to body of the report for detailed discussion regarding these concerns and impacts.	appropriately selected new tree species in the public realm and will consolidate the long term urban canopy coverage of 20%. It includes 'Green Streets' which are designed to accommodate additional trees. 'Green Streets' are designed to provide key east-west vegetation linkages through the Precincts, providing a desirable shady pedestrian and cycling focussed environment, connecting the community to their primary school site and the network of public open spaces.
94	<p>Comment only - Our business was established in this area as the Rural Composite zoning permitted our business and land use.</p> <p>We have established a successful well supported business providing goods and services to the community that they would normally have to travel large distances to get. Our customers strongly support our business and would benefit from new similar businesses in the area.</p> <p>We employ 3 fulltime employees. 2 live in the proposed LSP area Wattle Grove and 1 close by in Orange Grove. This represents how local business supports local jobs.</p> <p>Our family and business are involved in and support the local community. New businesses would do similar.</p> <p>We appreciate the opportunity to make a submission on the LSP proposed in the area we live and conduct our business.</p> <p>We support the proposed LSP residential zoning area ONLY EAST of Brentwood Rd PROVIDING it has MAJORITY support of LANDOWNERS in that area.</p> <p>We DO NOT support residential zoning in our area Precinct A.</p> <p>We support the concept of Activity Centre on our property and see it as an ideal location.</p> <p>Should this Activity Centre evolve on our property in the future we would consider relocating our Stockfeed business to our family's property at 60 Brentwood Rd Wattle Grove also Precinct A, provided land use zoning would allow this.</p> <p>We support Precinct A to be a Business / Enterprise zone supporting the existing and new medium size businesses that provide goods, services, tourism, hospitality and employment to the immediate area and beyond.</p> <p>Reasons</p> <p>Developers have no land interest in Precinct A and are unlikely to purchase any land as it is tightly held.</p> <p>It is not good long-term planning to zone all the area Residential simply because it is a simple easier and quicker outcome submission, even when it is not suitable, practical or best outcome.</p> <p>If our area became residential a new business zone would be needed in the future, and locations would not be as suitable as Precinct A.</p> <p>Community expects goods, services and employment within reasonable proximity of their homes.</p> <p>The Precinct A area is best suited to a Business / Enterprise Zoning given it already has established businesses that support the community, it has best proximity to major road networks and will provide good balance of housing to business ratio.</p> <p>Total wall to wall housing over the 126ha is not good planning and needs variety and mix.</p> <p>The 16 ha of Precinct A is very niche in its location for Business/Enterprise and would be a massive lost opportunity to develop too residential.</p> <p>The Business/Enterprise Zone in Precinct A would provide good opportunity for larger block sizes and better landscaping options.</p> <p>The area in Precinct A is subject to major road noise, dog pound noise, aircraft noise, making it low quality housing area.</p> <p>We acknowledge the POS policy but do not support the imbalance of some landowners providing large POS areas of their land while others provide little to none.</p> <p>We support and believe the best outcome for the proposed LSP area will be possible if the COK , major stakeholders including Precinct A landowners can work together and compromise on their goals. Priority should be given to existing and long-term landowners' views.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Business impact</li> <li>- Residential designation of Precinct A not appropriate</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Comments noted. The suggested modified 'Light Industry' zone in other submissions (notionally called an 'Enterprise Area') for Precinct A has merit. It is agreed that this would enable growth of the current businesses and establishment of other businesses. We do not object to this being further investigated by the landowners of Precinct A and represented as an opportunity in the structure plan.</p>

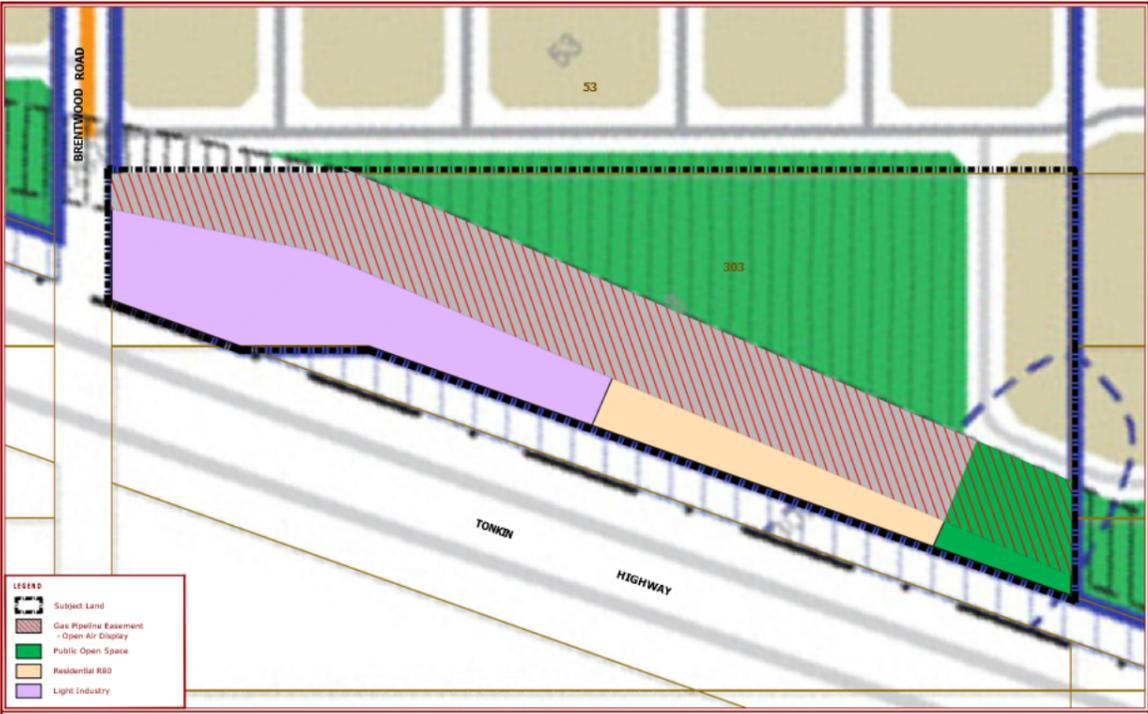
	<p>Ground and surface water management must be addressed by developers so non developed areas and landowners are not adversely impacted by changes especially by new land levels. Dayton and Brabham/ Henley Brook development water issues are examples of what we don't want to see in Wattle Grove.</p> <p>We support the submission from [planning consultant] representing Owners of Precinct A.</p> <p>We intend our family business to be continuing well into the future in this area and see a change to residential detrimental to our business and ability to maintain our future income.</p>		
95	<p>Support – We support the proposed structure plan for this area. This area is very obvious to be an excellent area for residential development being in close proximity to strategic employment opportunities.</p> <p>The plan has taken the need for sensitivity in catering for a harmonious environment with the native flora and wildlife that exists in the area.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Logical location</li> <li>- Environmentally sympathetic</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these elements of the draft Plan.</p>	(No comment provided by Applicant)
96	<p>Object - As a landowner, rate payer and resident, I strongly object to the Wattle Grove South Structure Plan.</p> <p>This plan and associated community engagement has been strongly rejected by a great majority of the Wattle Grove South residents with apparent disregard by council staff and councillors.</p> <p>I believe the area should be left in its current zoning status to preserve the lifestyle opportunity it presents and push back against the urban creep taking diversity of living options away from the metropolitan area.</p> <p>I hope you give due consideration to the landowners wishes as elected representatives and not dismiss the desire of the Wattle Grove South community.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Amenity impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	Comments noted. Strategic planning for the area has been progressed for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore consistent with the ongoing planning for this particular area.
97	<p>Object - Do not believe there has been consultation with Traditional Owners regarding impact on heritage sites and am concerned there is no discussion regarding long term management and protection of trees species and habitat. Present on site are endangered species like the gnorak (baudins black cocktattoo). This area forms part of Mandoorn an area with incredible plant diversity and should be a state protected area.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traditional owner concerns</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	An Aboriginal and Cultural Heritage Evaluation was prepared in support of the MRS amendment and Environmental Review Document. As part of this, a group was established with the guidance of consultant Brendan Moore, acting as the Noongar Group Facilitator. Brendan gathered a group of Whadjuk Traditional Owners with long connections to Country, that hold the kaartdijin (knowledge) about the area. The established Aboriginal Reference Group met for the first time on 5 December 2022. The recommendations from this were incorporated as part of the Aboriginal and Cultural Heritage Evaluation report, provided in Appendix J of the structure plan. In response to this, the structure plan has been designed to incorporate public open space around known sites. Brentwood Road Swamp artefacts scatter and registered heritage site is situated within the easement for the Dampier to Bunbury Natural Gas Pipeline (DBNGP). There are significant statutory limitations that apply to development and excavation of land within the DBNGP corridor will

			<p>largely protect the Brentwood Road Swamp heritage site from risk of physical disturbance. Existing trees within the project area that may have important cultural associations for the Whadjuk Noongar people are to be identified, and if possible, retained within future public open spaces and road reserves. It is recommended that subdivision or development within the vicinity of the Brentwood Road heritage site (ID 4343) be subject to: – An application for Section 18 approval, pursuant to the Aboriginal Heritage Act 1972. A Section 18 submission will need to be supported by an Aboriginal Heritage Survey.</p> <p>Engagement with Traditional Owners typically forms part of a Section 18 application. It is also recommended that an Archaeological Site Survey (and Archaeological Management Strategy in the event artefacts are uncovered) also be submitted with the application.</p>
98	<p>This area is zoned RURAL and should remain RURAL. This area is part of the 'Greenbelt' across the foothills - an historic environment plan. Rural lifestyle choice should remain an option. Large blocks allow for retention of many and mature native trees. The State Government wants to plant a million trees and this developer wants to destroy thousands of trees. Kalamunda City is planting trees in Wattle Grove - cell 9 - because that development destroyed trees. Brixton Street wetlands depends on this area for water collection. The area is already being degraded by the Gavour Road 'Lifestyle Village' which has hundreds of buildings and few mature trees. Wattle Grove cell 9 is a heat sink and clearing more Wattle Grove land will be environmentally detrimental.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>The Structure Plan, through the Landscape Masterplan and Tree Retention and Canopy Strategy, facilitates urban development in a manner that protects and supports the growth of existing trees. It prioritises the retention of trees identified as having a high worthiness of retention within the public realm; open spaces and streetscape. Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas.</p>
99	<p>Support - Firstly, I write to endorse the Submission made on behalf of the Precinct A Landowners (PAL) that seeks a revised zoning on the Precinct A area to purposefully recognise an 'Enterprise Area' that reasonably facilitates the ability for the existing and future enterprises in the Precinct A area, to service local and regional community needs such that they continue to complement the original objectives that the special 'composite' zonings that we had under 'Rural' .</p> <p>For my family enterprise [redacted], a further objective of the PAL submission is to provide security to my three sons that have taken over the business that I developed over 40 years, and which I located to Wattle Grove almost 20 years ago. The location, local facilities, large-scaled tree environment and ties to local community, are features of the district that we seek to continue with and hopefully expand upon in future years.</p> <p>In relation to the broader development, I draw attention to the following and seek your assistance in having these matters included and fully addressed in implementing the proposed development.</p> <p>1. Tree Retention and Landscape Management</p> <p>a) AS4970: - Please be aware that there is a new Australian Standard AS4970 - 2025 Protection of trees on</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Precinct A changed to non-residential</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Comments of support are noted. The Environmental for the MRS amendment will require the preparation of Tree Canopy Retention and Landscape Management Plan/s prior to subdivision or development to ensure trees are retained (where practicable) or replaced to provide connectivity between public open space and the proposed conservation areas. This management plan will be prepared in consideration of Australian Standard AS4970 - 2025 Protection of trees on development sites, which will then inform future landscape and engineering works to maximise the survival of trees retained within the public realm i.e. open space and streetscapes. Further, specialist advice has been sought from an arborist</p>

	<p>development sites. This Standard provides a comprehensive guide on how to successfully retain existing tree(s) that have been identified for retention. A flow chart on the process that the Standard recommends is available from Arbor Centre (731 Welshpool Road East, Wattle Grove).</p> <p>Essentially, the Standard calls for the development of Tree Protection Specifications (TPS) and Tree Protection Plans (TPP), that form part of the tender documentation. These specifications and plans inform &amp; direct those involved in Civils, Construction and Landscaping, on what it is that they physically need to do on site... rather than unfairly expecting these people to make decision on tree welfare and survival that they have limited, if any, knowledge of or training in.</p> <p>The AS4970 process also identifies what is required to retain tree(s) in-situ at the planning stage. Thereby enabling the logistics and associated costs of tree retention to be considered and documented in the same way that other construction is specified.</p> <p>It should be noted that the application of AS4970 can also be applied to below ground infrastructure including Power, Sewage, Gas, Water and Communications,,, which are often introduced into new subdivisions with limited, or no regard, for existing vegetation. Further, that there are measures that can be incorporated into the installation of these kinds of infrastructure that afford them protection from future root damage.</p> <p>b) Engineering Space for Trees: - New tree plantings require adequate rootable soil space for them to survive and grow to be useful urban trees. There are many below ground root zone management techniques that can be utilised that enable tree roots and hardstand to be compatible partners in the landscape. I would urge that PAL, Hesperia and Jardim adopt such initiatives into the re-development of existing lots and road networks.</p> <p>c) Bulk Earthworks: - It is these early works that usually predetermine the fate of existing trees. The adoption of the AS4970 process is an imperative in determining the viability or otherwise for retaining worthwhile or nominated trees successfully. How tree root zones are managed to cope with site specific changes involves tree specific knowledge and experience that is beyond the realms of modern day training of Environmentalists. Recommend that arboriculture expertise in this area is taken on board to optimise tree retention and minimise the costs associated with development around existing trees and providing appropriate space for new trees that can provide the Council's canopy cover aspirations.</p> <p>2. Surface and ground water management: - We do not want a repeat of the mismanagement of surface and ground water that has become evident in estates west of West Swan Road in the Swan Valley. The additional water introduced to the hydrological circumstances of the Wattle Grove South development area, adds another dimension to this. Again, I would urge the engagement of arboriculture expertise in determining cost effective ways of managing surface and ground water such that the existing tree population is better able to cope with the impacts of development and in particular</p> <p>* the influence of de-watering for the installation of sewage to the area, and</p> <p>* in making hardstand areas more permeable.</p>		<p>regarding the future retention and protection of the trees retained within the public realm.</p>
100	<p>Object - I object to the Wattle Grove Structure Plan.</p> <p>As this is the last chance to have my say on the proposed structure plan for Wattle Grove South. Basically it can be summarized in 6 words.</p> <p>"NO URBANIZATION OF WATTLE GROVE SOUTH"</p> <p>We bought in this area 44 years ago for serenity, trees, outlook of the area and the beauty to raise a family. Kalamunda Shire has the saying of "Home in the Forest". If one was to drive around the City, they would find this is fast changing to being engulfed in the sprawling madness of rooftop to roof top housing and increased rate of crime. Along with this we have a decreasing rate of tree canopy cover within the C.O.K. In 2020, Kalamunda's urban canopy cover was 21%. Despite the high overall cover, the city had a poor ranking for the annual loss of tree canopy, primarily due to residential and industrial development. ( Western Australian Government <a href="https://www.wa.gov.au">https://www.wa.gov.au</a>)</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> <li>- Density concerns (over 2000m2 preferred)</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>The Structure Plan supports the realisation of future residential development. It demonstrates due regard for significant remnant environmental values through the respectful configuration and alignment of the road network, servicing infrastructure and street blocks. New local parks will provide opportunity for tree retention in the public realm and further diversify the outdoor experiences and activity choices for local residents. The design will protect identified significant flora and vegetation values in conservation reserves managed by a CAMP.</p>

	<p>Wattle Grove South rezoning was discussed, with the original urban concept plan(Roberts Day) which was overwhelmingly rejected by residents (145 written objections, only two in support). This WGSSP is based on this Roberts Day Urban Concept Plan</p> <p>Greedy developers will only destroy the well functioning community of Wattle Grove South including it ecological sensitive environment.</p> <p>People wishing to subdivide their land-Subdivide to a minimum size 2020 sqm's is in keeping with the general consensus of the majority of the landowners, but 200sqm blocks is unacceptable in a hills environment,</p> <p>As councillors, elected by the people, it is very concerning when the voice of the majority of the people is disregarded.</p>		
101	<p>Object - We purchased our property for a rural lifestyle.</p> <p>We are very concerned with increased traffic issues and destruction of wildlife habitation should this development go ahead.</p> <p>We do not want urban development creating additional noise and pollution</p> <p>We are already having to deal with the lifestyle village proposed for Gavour Road which will also increase traffic, noise and loss of wildlife habitation.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concerns</li> <li>- Traffic impact</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Refer to previous response on the retention of significant vegetation, flora and fauna values in proposed conservation areas. The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips.</p>
102	<p>Support - We are pleased to provide this submission of strong support for the Structure Plan, as detailed below. The proposal is consistent with State Strategic Planning and seeks to implement the first part of the 'Urban Expansion' area identified by the Western Australian Planning Commission's (WAPC) North East Sub-Regional Planning Framework. The Metropolitan Scheme Amendment and concurrent Local Planning Scheme rezoning of the Wattle Grove South area to 'Urban' and 'Urban Development' zone respectively are well progressed, and the EPA has supported the proposal subject to a range of environmental conditions which have been addressed through supporting technical studies and incorporated into the Structure Plan provisions. Development of the area will address the current undersupply, and in part the forecast future demand, for additional residential land in this locality.</p> <p>The Structure Plan provides for a range of residential lot typologies to cater to the wider socio-demographic of the City. The Wattle Grove South area is in a strategic location, in close proximity to the existing urban front, existing and planned infrastructure and services, the future Forrestfield Train Station and nearby major arterial routes (e.g. Tonkin Highway and Roe Highway), and employment hubs including the Maddington Kenwick Strategic Employment Area (MKSEA). It is also understood that there is significant support for the rezoning from landowners within the rezoning area. Some landowners are motivated to develop their land, whilst others may not wish to participate in development in the short-medium term, if at all. The Structure Plan provides a logical framework to coordinate progressive urbanisation of the locality over time.</p> <p>The Structure Plan introduces landscape linkages, recreational nodes and circuits of pedestrian routes within the site to promote connections to the surrounding landscape. The Structure Plans depicts that the discrete localised areas of remnant vegetation and declared rare flora which were identified in the rezoning process will be retained, managed and protected in conservation areas. The focus on native tree retention and integration within the future residential footprint where possible is also supported. Urbanisation in line with the Structure Plan will also</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Consistent with planning framework</li> <li>- Logical design</li> <li>- Positive impact on tree canopy</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these elements of the draft Plan.</p>	<p>Comments of support noted.</p>

	<p>introduce substantial new tree planting to achieve significant tree canopy and local amenity as the site develops. The Structure Plan integrates sustainable urban drainage. It has been demonstrated that predevelopment surface and ground water hydrology can be maintained and as such, any potential adverse impacts on the Greater Brixton Street wetlands will be avoided. Water quality will be improved with the change in land use, particularly the introduction of deep sewer (in lieu of septic tanks) and the removal of rural and turf farm uses (including a significant decrease in the application of fertilisers and nutrients). It is recognised that significant and robust environmental investigations and studies have been undertaken for the area to support the rezoning process. The requirement to deliver high quality environmental outcomes proposed in the Structure Plan and for these to be implemented through management plans and conservation/protection through the subdivision and development processes will ensure that these environmental outcomes are achieved.</p>		
103	<p>Object - I strongly oppose the purported Wattle Grove South Structure Plan (WGSSP).</p> <p>The land is zoned rural and also under current EPA assessment and the MRS 1388/57 has not been approved. The WAPC has also not given instruction or authority for the preparation or advertising of a structure plan.</p> <p>The WGSSP is therefore premature and could be considered illegal. This is all extremely concerning for the majority of residents of WGS who expect the CoK to adhere to and follow proper planning principles. These principles require that re-zoning and environmental approval must be given before an urban structure plan is made.</p> <p>To advertise a structure plan before the vital proper planning processes, approvals and authorizations is unjust to those landowners who will be affected by re-zoning from rural to urban. It implies that the re-zoning is a 'fait accompli' creating public distrust in governance.</p> <p>The symbiotic relationship with the CoK and developers is also concerning for WGS residents whereby the majority of landowners have repeatedly voiced their opposition to re-zoning to urban. One hundred and forty five people voted in written support against the Robert's Day urban concept plan to two people in support of it. This WGSSP is based on this previous urban concept plan. The voices of the people have been ignored and the developers are given CoK staff assistance to further their plans of 'land grabbing' for their profit at the expense of and the ongoing demise of the WGS landowners with having to pay extra rates in the form of Development Funds for years ahead. Development they will have to pay for and did not approve of and development which will destroy their existing lifestyle.</p> <p>High density urban zoning is unsuitable for a hills environment. Kalamunda ratepayers have often stated in surveys that they choose to live here for the peace and tranquility that a natural environment of 'A Home in the Forest' provides.</p> <p>High density housing is also unsuitable for a hills environment due to the high fire risk zone that we live in. Also to be is absence of sewage and increase in traffic levels.</p> <p>The Cok needs to uphold lawful planning and environmental stewardship and community trust by refusing to progress the WGSSP until all statutory obligations and environmental assessments are complete.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Procedural concerns</li> <li>- Perception of community objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>The draft structure plan can still be progressed concurrently with the Metropolitan Region Scheme (MRS) amendment. The parallel assessment of the structure plan with the MRS amendment provides a distinct benefit for agency assessors and the community by providing another level of detail, resulting in a more informed proposal. The structure plan is therefore deemed necessary for the purposes of orderly and proper planning. Strategic planning for the area has been progressed for some time now. Initially as an Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore consistent with the ongoing planning for this particular area.</p>
104	<p>Object - I strongly oppose this structure plan for Wattle Grove South.</p> <p>Crystal Brook Road intersections are so busy already and with the major increase in traffic from this development, congestion will be a major problem. And the current infrastructure won't cope. Welshpool road and Kelvin road will also be a problem. The native vegetation will be taken away and I don't see how they can replace or retain trees that have been there for decades. The wildlife will lose their habitat, and food sources.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concerns</li> <li>- Traffic impact</li> <li>- Environmental impact</li> </ul>	<p>The Transport Impact Assessment demonstrates the road network can accommodate development and multiple access connections to disperse trips. Refer to previous response on the retention of significant vegetation, flora and fauna values in proposed conservation areas.</p>

		Please refer to body of the report for detailed discussion regarding these concerns and impacts.	
105	<p>Support</p> <p>We write with regard to the Wattle Grove South Local Structure Plan and provide the following comment during the City's advertising of the proposal on behalf of our client [name].</p> <p>We thank Hesperia, proponents of the Local Structure Plan (LSP) for reflecting the planning we proposed over our client's landholding at [address]. This includes:</p> <ul style="list-style-type: none"> <li>• A portion of land set aside as Light Industry to accommodate the relocation of our client's business premises from [address] to [address]</li> <li>• A portion of land set aside for Residential R80 at the south-eastern end of Lot 303, south of the gas pipeline easement, for the purposes of residential housing</li> <li>• Retention of land within the gas pipeline easement on Lot 303 for future open air display (nominally grass turf) subject to relevant approvals. This portion of the gas pipeline easement will be retained and managed by our client</li> </ul> <p>In our submission we note that the detailed future planning of Lot 303 may seek minor amendments to the boundary between the Light Industry and Residential R80 areas south of the gas pipeline easement. This will be subject to future detailed design.</p> <p>We have attached a plan showing the current design configuration over Lot 303 and request the advertised LSP be modified to reflect this change as part of the City's assessment. This shows the Light Industry area running from Brentwood Road to the telecommunications tower and the Residential R80 area running southeast from the telecommunications tower to the small area of public open space shown south of the gas pipeline easement. We thank the City for the opportunity to comment on the proposed Local Structure Plan.</p> 	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> </ul> <p>The Administration notes this is a complex area of the plan and the landowner has been engaged in the preparation stage of the plan.</p> <p>The Administration recommends the Structure Plan be modified to consider the designation changes proposed in submission 105.</p>	Noted.
106	Object	The Administration notes the submission and themes of	The structure plan recommends that subdivision or development within the vicinity of the

	<p>I am a descendant of Joobaitch and Munday who are the original owners of the land on which the City of Kalamunda and this proposed development sit.</p> <p>I would like to request that prior to this development occurring that heritage survey in the form of test pitting occurs.</p> <p>The Shire (City of Kalamunda) may be aware that test pitting near Munday's swamp revealed artifacts dated to 41,400 years ago. The artefacts were located in a test pit which went down about 200cm's (2 metres). I implore the Shire to do the right thing and properly investigate the Aboriginal heritage of this new proposed development.</p> <p>Please reach out to me. I can pass on details of the Archaeologist from the Munday Swamp dig.</p>	<ul style="list-style-type: none"> <li>- Comment</li> <li>- Traditional owner concerns</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Brentwood Road heritage site (ID 4343) be subject to: – An application for Section 18 approval, pursuant to the Aboriginal Heritage Act 1972. A Section 18 submission will need to be supported by an Aboriginal Heritage Survey. – Engagement with Traditional Owners typically forms part of a Section 18 application. It is also recommended that an Archaeological Site Survey (and Archaeological Management Strategy in the event artefacts are uncovered) also be submitted with the application. In the context of the comments made under submission 106 for 'test pitting', the above matters shall address the submitters request.</p>
107	<p>Support - We thank Hesperia, proponents of the Local Structure Plan (LSP) for reflecting the planning we proposed over our client's landholdings at [address]. This includes a residential street block pattern and density, provision of public open space and provision of a portion of the proposed primary school (equivalent to our client's pro-rata share of the school site).</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Support</li> <li>- Logical design</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these elements of the draft Plan.</p>	<p>Comments of support noted.</p>
108	<p>Comment only - * We strongly oppose some POS on our property and may consider some.  * We recognise and would consider the POS of the land of which is the easement of DBGP - approx. 11000m2.  * We have access to our property from Boundary Road through the DBGP easement and would need access from Boundary Road to our property before considering POS of this DBGP area.  * We strongly oppose closure of Boundary Road as proposed in this current LSP - this road provides access to our property.  * Compensation for the DBGP POS would have to be fair and reasonable, to be considered.  * The LSP proposes approx. 20,000m2 POS over our property. This is totally imbalanced and unfair, considering most landowners give up much less.  * We do not support POS over non DBGP land on our property. It is not balanced or fair between all landowners to allocate approx. 20,000m2 POS on our 27,000m2 property.  * We have always cooperated and supported the LSP property proponent, in allowing monitoring bores and environmental access to our property for the necessary studies. We would appreciate that we are not proposed with more than the DBGP as POS on our property, because this would be fairer and more balanced.  * We support LSP east of Brentwood Road, provided existing landowners of that area support the LSP.  * We do not support Residential on the west side of Brentwood Road - approx. 16ha.  * We support a business/enterprise zone for the precinct A - supporting community, business, tourism, hospitality and employment.  * We support Activity Centre at 14 Brentwood Road and would consider the Stockfeed business relocating to 60 Brentwood Road, if zoning allowed this.  * We support the submission of the PAL group.  * We would appreciate being informed of progress of the LSP and would be happy to attend any meetings that may affect our circumstances or be of our main interest.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Design concerns (POS affecting landholding, road closures)</li> <li>- Precinct A to be non-residential</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Comments regarding POS allocation noted. You have the ability to amend the proposed location of the POS through future design amendments, should it be required. The suggested modified 'Light Industry' zone notionally called an 'Enterprise Area' has merit. It is agreed that this would enable growth of the current businesses and establishment of other businesses. We do not object to this being further investigated by the landowners of Precinct A. It is agreed that text provisions could be included in the Structure Plan to accommodate this opportunity. This would mean that the public open space areas could be revisited, as you have requested.</p>
109	<p>Object - This rural area allows for retention of thousands of large, mature trees which enhance a rural lifestyle and should remain as a choice for residents. The developer is only looking at their profit, and not the environment,</p>	<p>The Administration notes the submission and themes of</p>	<p>Please refer to previous response regarding protection of significant vegetation, flora and fauna</p>

	<p>which will suffer as they will justify clearing land to install services. Planting saplings, will may or may not survive, will not replace old growth trees. Native animals, reptiles, bandicoots and hundreds of species of birds are important and rural acreage enables them to exist. Looking towards Perth from the Lions lookout, the massive industrial buildings are an eyesore, the mature vegetation, beautiful. These trees are the lungs of the city and should be retained - for us now - and future generations.</p>	<ul style="list-style-type: none"> <li>- Objection</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. the Environmental for the MRS amendment will require the preparation of Tree Canopy Retention and Landscape Management Plan/s prior to subdivision or development to ensure trees are retained (where practicable) or replaced to provide connectivity between public open space and the proposed conservation areas. This management plan will be prepared in consideration of Australian Standard AS4970 - 2025 Protection of trees on development sites, which will then inform future landscape and engineering works to maximise the survival of trees retained within the public realm i.e. open space and streetscapes. Further, specialist advice has been sought from an arborist regarding the future retention and protection of the trees retained within the public realm.</p>
110	<p>Object - While I like the idea of green spaces, walks, bridleways, retaining the tree canopy and I'm not opposed to a school and residential housing in the area, the housing density proposed is too great. It will have too great an impact on the area and surrounding roads. Will there be an access in and out directly from the Tonkin Highway? That might help the problem rather than pouring traffic on to Crystal Brook road. We have had some terrible accidents on Crystal Brook road at the junction with Kelvin Road and at the junction with Welshpool Road / cars coming off the road on the steep run up to Welshpool Road. Having seen dead and burning people personally (we overlook that part of the road and so have often been first on the scene) we do not want Crystal Brook Road to become any busier, it is a real concern. Thank you</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Density concerns</li> <li>- Traffic impact</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Comments noted.</p> <p>The Welshpool Road East/Crystal Brook Road intersection traffic matters are recognised as existing issues for Main Roads WA and the City of Kalamunda, irrespective of the proposed development of Wattle Grove South. These matters raised will need to be resolved by Main Roads WA as part of its planned upgrades to the Crystal Brook Road and Tonkin Highway intersection grade separation solution. In the longer term, Welshpool Road East/Lewis Road intersection is projected to exceed practical capacity as a result of background traffic growth and traffic generated by the structure plan. Traffic signals and roundabout layouts have been tested, and a roundabout layout is likely to be the preferred option for this intersection in the future.</p>
111	<p>Comment only - We have no opinion on the proposed residential zoning east of Brentwood Rd. Rural Composite allows [business] to have a commercial vehicle parked on the property which he uses to park his tilt tray/tow truck. [business] provides a good needed service to local and general road users which is owner operator business. They do not support the residential zoning for the area West of Brentwood Rd as it will not allow for parking of a commercial vehicle. He feels this would affect his ability to get an income and may risk his means to retain this property.</p> <p>I also don't support the LSP proposed residential for our area as the area it is not ideal for housing but would be better for businesses which could continue to service the community and provide income to landowners. We would also like to retain the ability to have a single house on our property just like Rural Composite allows. We support the submission that represents the Precinct A Landowners (PAL) views and proposal.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Precinct A non-residential</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Comments noted. The suggested modified 'Light Industry' zone notionally called an 'Enterprise Area' has merit. It is agreed that this would enable growth of the current businesses and establishment of other businesses. We do not object to this being further investigated by the landowners of Precinct A. It is agreed that text provisions could be included in the Structure Plan to accommodate this opportunity.</p>

112	<p>Object - The proposed urban development will affect the wildlife habitat and increase traffic, and create additional noise and pollution.</p> <p>If this proposal is approved the escapement of the Darling Range will disappear due to the greed of developers in the foreseeable future.</p> <p>I call upon the City of Kalamunda to strongly reject the proposal to the WAPC and kept the semi-rural buffer zone for all Western Australians</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic Impact</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Please refer to previous response regarding the protection of significant vegetation, flora and fauna values in the proposed conservation areas.</p>
113	<p>Comment only –</p> <ol style="list-style-type: none"> <li>1. This are of the foothills has very valuable rare threatened and endangered flora species and communities. This has been known for a long time, but recent planning and management decisions have not yet adequately protected these values.</li> <li>2. The nature of Perth's extended drought and heavier foothills soils help people to underestimate natural values and vegetation resilience after cyclic return of rain. The area is adjacent to and connected to the Hartfield Park, Brixton St and Yule Brook/ Lesmurdie Brook/ Woodlupine Brook systems and does not yet work with the opportunities presented by the constrained natural gas pipelines corridor, and the design does not yet suggest providing a sensible parallel vegetated swale corridor to make the most of linkage and regrowth and the provision of a parallel regional corridor. I think it should.</li> <li>3. There is significant remnants of high value canopy and understory vegetation remaining but rather than linking vegetated areas into greenways and encouraging cluster development to protect perhaps 80% of these remnants and wetland buffer, and perhaps having a beautiful design of 20 to 30% as POS this proposal sanctions and encourages clearing of canopy and the rare, endangered and vulnerable habitat. I don't think this is not good planning, good design or carefully moving towards responsible conservation. It is also not consistent with the Shire's avowed interest in protecting canopy. Multiple objective environmental planning works well informing good design but this plan is not yet a good example of this.</li> <li>4. The regional context of this area known for the quality of the Crystal Brook Creek waters must be used to rehabilitate and link the Shires creeks and 50 m each side wildlife corridors of its 1998 Wildlife Corridor Strategy Policy and be informed and consistent with National, State, Regional, First Nation, Local Family Clan knowledge about Lesmurdie Brook, Hartfield Park, and other known Indigenous heritage areas, and continuing historic corroborees and art works, or interacting with local natural and cultural values. I don't think this plan is adequate yet to meet responsible planning at any of these scales. I think it needs to be.</li> </ol>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Comment</li> <li>- Amenity impact</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Please refer to previous response regarding protection of significant vegetation, flora and fauna values in the proposed conservation areas, and the proposed tree retention and planting within the public realm, open spaces and streetscape, to provide long term canopy coverage and ecological linkages between the proposed conservation areas. Regarding the provision of a parallel vegetated swale corridor, there are restrictions regarding the planting of vegetation within the corridor, for example vegetation roots must not exceed 300mm in depth. Most species used within vegetated swales have a typical root depths that are 15 to 30cm, exceeding the 3cm restriction. Currently, there are no watercourses or creek lines within the Structure Plan area; however, the Yule Brook is located 700 m north of the Structure Plan boundary. Further, the former Crystal Brook tributary once provided a natural surface water flow path from the northern portion of the Structure Plan to the Greater Brixton Street Wetland, but was historically cleared and infilled to facilitate semi-rural and commercial land uses, construction of Boundary Road and Tonkin Highway. The remnant portion of the former brook is located within Lot 501 which is adjacent to the Structure Plan area and Boundary Road. Whilst Lot 501 is mapped as conservation category wetland; approximately 80% of this lot has been historically cleared, with the remaining vegetation within this lot assessed as being degraded. Further, the Tonkin Highway Grade Separated Interchanges (Hale Road and Welshpool Road) recently received environmental approval and proposes to develop part of Lot 501 for the Welshpool Road interchange, and thereby limits the opportunity to rehabilitate this area as a wildlife corridor.</p>
114	<p>Object - The plan does not reflect the long-standing rural-residential character of Wattle Grove South or the clear wishes of local residents. Previous consultations showed strong opposition to dense housing and support for</p>	<p>The Administration notes the submission and themes of</p>	<p>Strategic planning for the area has been progressed for some time now. Initially as an</p>

	<p>retaining the area's rural zoning. Despite this, the Structure Plan proposes small suburban lots (280–450 m<sup>2</sup>) that would permanently destroy the semi-rural environment.</p> <p>The WGSSP is also based on an MRS Amendment that is still unapproved and was wrongly treated as a "minor" amendment despite affecting more than 120 hectares and around 80 landowners directly. It should have received far greater scrutiny.</p> <p>Environmental information in the WGSSP is not independent—it was produced by consultants paid by the developer. Given the proximity to the Greater Brixton Street Wetlands and sensitive hydrology, a government-led assessment is essential.</p> <p>The term "urban investigation area" has also created a misleading impression that urbanisation is already approved when it is not.</p> <p>For these reasons, I strongly oppose the WGSSP and ask councillors to reject it.</p>	<ul style="list-style-type: none"> <li>- Objection</li> <li>- Perception of community objection</li> <li>- Density concerns</li> <li>- Procedural concerns</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Urban Investigation area under the City's Local Planning Strategy 2010 and an expansion area under the WAPC North-East Sub-Regional Planning Framework plan introduced in March 2018. The proposed structure plan is therefore consistent with the ongoing planning for this particular area. The Local Water Management Strategy and future Urban Water Management Plan/s (which are required by the Environmental Conditions) will be prepared and implemented to ensure there are no adverse impacts to the Greater Brixton Street Wetlands, including impacts to the wetland's persistency, hydrological regime, water quality, ecological integrity and ecological function.</p>
115	<p>Object - I'm concerned about the influx of traffic and congestion on Crystal Brook and Welshpool road it is as congested already.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Traffic impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>The Structure Plan's Transport Impact Assessment recommends to the City of Kalamunda and Main Roads WA that the Welshpool Road East / Crystal Brook Road / Brentwood Road intersection be upgraded to a four-way roundabout configuration to accommodate the project traffic volumes in the full build-out year 2040 scenario.</p>
116	<p>Object - I do not support the proposed structure plan for Wattle Grove South. The land is currently zoned Rural, the rezoning has not been approved, and the EPA has not finalised its assessment of the environmental impacts. It is premature to progress at this stage, and full and proper environmental assessments must first be finalised, to ensure the biodiversity and habitat value of the area is protected appropriately.</p>	<p>The Administration notes the submission and themes of</p> <ul style="list-style-type: none"> <li>- Objection</li> <li>- Procedural concerns</li> <li>- Environmental impact</li> </ul> <p>Please refer to body of the report for detailed discussion regarding these concerns and impacts.</p>	<p>Refer to previous response regarding EPA assessment and recommendations to Minister for Environment, and planning processes and approvals to follow regarding MRS amendment, concurrent LPS 3 amendment and Local Structure Plan. The draft structure plan can still be progressed concurrently with the Metropolitan Region Scheme (MRS) amendment. The parallel assessment of the structure plan with the MRS amendment provides a distinct benefit for agency assessors by providing another level of detail, resulting in a more informed proposal. The structure plan is therefore deemed necessary for the purposes of orderly and proper planning.</p>