



October 2024

Metropolitan Region Scheme Amendment **1408/57** (Minor Amendment)



Forrestdale Townsite East

Report on Submissions
Submissions

City of Armadale

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Amendment 1408/57
(Minor Amendment)**

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Introduction to Metropolitan Region Scheme minor amendments

The Western Australian Planning Commission (WAPC) is responsible for keeping the Metropolitan Region Scheme under review and initiating changes where they are seen as necessary.

The Metropolitan Region Scheme (MRS) sets out the broad pattern of land use for the whole Perth metropolitan region. The MRS is constantly under review to best reflect regional planning and development needs.

An amendment proposal to change land use reservations and zones in the MRS is regulated by the *Planning and Development Act 2005*. That legislation provides for public submissions to be made on proposed amendments.

For a non-substantial amendment, often referred to as a minor amendment (made under former section 57 of the Act), the WAPC considers all the submissions lodged, and publishes its recommendations in a report on submissions. This report is presented to the Minister for Planning for approval. The amendment takes legal effect with Gazettal of the Minister's approval.

In the process of making a non-substantial amendment to the MRS, information is published as a public record under the following titles:

Amendment report

This document is available from the start of the public advertising period of the proposed amendment. It sets out the purpose and scope of the proposal, explains why the amendment is considered necessary, and informs people how they can comment through the submission process.

Environmental review report

The Environmental Protection Authority must consider the environmental impact of an amendment to the MRS before it can be advertised. While formal assessment would be unlikely for a non-substantial amendment, were it required then an environmental review would be undertaken and made available for information and comment at the same time as the amendment report.

Report on submissions

The planning rationale, determination of submissions and the WAPC's recommendations for final approval of the amendment, with or without modification, is documented in this report.

Submissions

This document contains a reproduction of all written submissions received by the WAPC on the proposed amendment.

Contents

Report on Submissions

1	Introduction	1
2	The proposed amendment	1
3	Environmental Protection Authority advice	1
4	Call for submissions	1
5	Submissions.....	2
6	Main issues raised in submissions	2
7	Modifications	3
8	Determinations	3
9	Coordination of region and local scheme amendments	4
10	Conclusion and recommendation	4
11	Ministers decision.....	4

Schedule 1 Listing of submissions

Schedule 2 Summary of submissions and determinations

Schedule 3 Amendment Figure - Proposal 1 (as advertised)

Schedule 4 Amendment Figure - Proposal 1 (as modified)

Appendix A List of plans (as advertised)

Appendix B List of plans (as modified)

Submissions

Report on Submissions

Metropolitan Region Scheme Amendment 1408/57

Forrestdale Townsite East

Report on Submissions

1 Introduction

At its July 2023 meeting, the Western Australian Planning Commission (WAPC) resolved to proceed with this amendment to the Metropolitan Region Scheme (MRS) in accordance with the provisions of section 57 of the *Planning and Development Act 2005*.

The principal differences between the former minor and the major MRS amendment processes are that the former includes a 60-day advertising period while the period for the latter is 90 days, the former is not required to be placed before Parliament (for 12 sitting days) while the latter is and there is not requirement for submitters to be offered hearings for minor amendments.

2 The proposed amendment

The amendment proposal was described in the previously published *Amendment Report*, and a description of the proposal is repeated below.

The purpose of the amendment is to rezone approximately 56.37 ha in Forrestdale from the Rural zone to the Urban and Urban Deferred zones and Parks and Recreation and Primary Regional Roads reservations in the MRS.

The proposed amendment would facilitate the future residential development of the site with public open space/conservation areas and regional road widening, as shown on the ***Amendment Figure - Proposal 1***.

3 Environmental Protection Authority advice

On 4 December 2023, the Environmental Protection Authority (EPA) considered that the proposed amendment should not be assessed under Part IV Division 3 of the *Environmental Protection Act 1986*, and provided advice on flora and vegetation, terrestrial fauna, inland waters and social surrounds.

A copy of the notice from the EPA is in Appendix A of the *Amendment Report*.

4 Call for submissions

The amendment was advertised for public submissions from 12 January 2024 to 12 March 2024, and was made available for public inspection during ordinary business hours at the:

- i) Western Australian Planning Commission, 140 William Street, Perth
- ii) City of Armadale
- ii) State Reference Library, Northbridge.

During the public inspection period, notice of the amendment was published in *The West Australian* and relevant local newspaper/s circulating in the locality of the amendment.

5 Submissions

Twenty submissions, including two late submissions, were received on the amendment. An index of all submissions is provided at Schedule 1.

Ten submissions were of objection, three were of support and seven were of general comments, non-objection or no comment.

A summary of each submission with WAPC comments and determinations is at Schedule 2. A complete copy of all written submissions is contained in this report.

6 Main issues raised in submissions

Urban Deferred zone

It has been requested that the Urban Deferred zone be replaced by an Urban zone.

WAPC Comment: The Water Corporation has advised that a potential Water Resource Recovery Facility could be located on Lots 510 and 5060 Waterworks Road, Haynes (east of amendment area) which may require a generic 500 m buffer. This potential facility would be approximately 220 m at its closest point to the subject land.

The Corporation has not commenced investigations into the feasibility of such a facility and the potential timing of when the Corporation's investigations could be finalised are unknown. However, the Corporation has advised that it will accept that the WAPC will need to make a decision on acceptable landuses within the subject land which takes all the community's needs into account.

Lots 510 and 5060 Waterworks Road are approximately 30 ha in area and the siting and design of a potential resource recovery facility could be located in manner which seeks to avoid or minimise potential buffer impacts on the surrounding locality. In addition, there are existing residents (approximately 171 m away) which are already located within a potential 500 m buffer area which must be taken in consideration should such a facility be considered.

Therefore, the modification of the amendment by replacing the Urban Deferred zone with an Urban zone is supported, as this will provide certainty of outcome that will enable more detailed planning for this land to progress in a co-ordinated manner and in conjunction with a future structure plan where specific landuses would be confirmed in consultation with the City of Armadale and government agencies/utilities.

The proposal will also provide additional land in a location that has access to existing transport, utility services and community infrastructure. Rezoning the eastern portion to Urban will enable the land to be planned and delivered in association with the balance of the site in accordance with its identification in the South Metropolitan Peel Sub-regional Planning Framework.

Environmental Impacts

Submitters advise that the proposed amendment will negatively impact on the existing flora and fauna values in the locality.

WAPC Comment: The amendment area is identified for urban purposes in the South Metropolitan Peel Sub-regional Planning Framework. The Framework identifies approximately 610 ha immediately south of the amendment area as contiguous 'open space' with a further 430 ha of contiguous 'open space' identified to the north of Armadale Road. When considered in context, there is a significant amount of open space in Forrestdale. The amendment area itself also proposes to include a further 4.5 ha of land as a Parks and Recreation reservation.

Vegetation is proposed to be retained within open space areas identified for conservation that will provide fauna habitat opportunities specifically, the Regional Open Space and the Public Open Space (POS) located along Broome Street. Fauna habitat fragmentation will be minimised through incorporation of a vegetated corridor along the western boundary of the site, supported by retained vegetation areas in other parts of the site.

Preparation of a Fauna Relocation and Management Plan is included as a commitment within the proponents Environmental Assessment Report. This plan would identify procedures for pre-clearing fauna survey/relocation such as having relocators onsite during vegetation clearing to facilitate additional capture and relocation of fauna, including bandicoots.

With regard to midges, while Social Surroundings was identified as a preliminary environmental factor relevant to the amendment, the EPA did not consider these impacts to be significant enough to warrant formal assessment under the Environmental Protection Act 1986 or specific advice in relation to this matter. Notwithstanding, it is understood that a variety of development and built form strategies that can be implemented to minimise the impacts of midges and will be further considered in the subsequent structure planning stage.

7 Modifications

The proposed amendment is to be modified as follows:

- a) Urban Deferred zone: The Urban Deferred zone is to be replaced with an Urban zone.
- b) Primary Regional Roads reservation: As requested by Main Roads WA the additional road widening along Armadale Road has been included in the Primary Regional Roads reservation.

As these modifications do not alter the intent of the advertised amendment, to urbanise the site to allow for a variety of mixed-uses (i.e., residential, commercial etc) and refines the existing regional road widening, re-advertising of the amendment is not considered necessary.

8 Determinations

The responses to all submissions are detailed in Schedule 2. It is recommended that the amendment be adopted for finalisation as modified.

9 Coordination of region and local scheme amendments

Under section 126(3) of the *Planning and Development Act 2005*, the WAPC has the option of concurrently rezoning land that is being zoned Urban under the Metropolitan Region Scheme, to a zone which is consistent with the objective of the Urban zone in the corresponding local planning scheme.

It is noted that a separate amendment for the Urban zone is to be undertaken under the City of Armadale Local Planning Scheme No. 4.

10 Conclusion and recommendation

This report summarises the background to MRS Amendment 1408/57 and examines the various submissions made on it.

The WAPC, after considering the submissions, is satisfied that the amendment as shown generally on **Amendment Figure - Proposal 1** in Schedule 4 (as modified) and in detail on the Amending Plan listed in Appendix B (as modified) should be approved and finalised.

The WAPC recommends that the Minister for Planning approves the modified amendment.

11 Ministers decision

Amendments to the Metropolitan Region Scheme using the provisions of former section 57 of the *Planning and Development Act 2005* require the WAPC to provide a report and recommendation to the Minister for Planning for approval. The Minister may approve, approve with modification or decline to approve the proposed amendment.

The Minister, after considering the amendment, has agreed with the recommendation of the WAPC and approved the amendment.

MRS Amendment 1408/57 is now finalised as modified and shown on WAPC Amending Plan 3.2813/1 and has effect in the Metropolitan Region Scheme from the date of notice in the *Government Gazette* on 4 October 2024.

Schedule 1
Listing of submissions

Listing of Submissions
Metropolitan Region Scheme Amendment 1408/57
Forrestdale Townsite East

Submission Number	Name
1	Department of Water and Environmental Regulation
2	Water Corporation
3	<i>Name removed at request of submitter</i>
4	Department of Health
5	Department of Transport
6	Department of Biodiversity, Conservation and Attractions
7	David F James
8	<i>Name removed at request of submitter</i>
9	Wendy Bishop
10	<i>Name removed at request of submitter</i>
11	<i>Name removed at request of submitter</i>
12	<i>Name removed at request of submitter</i>
13	Timothy Hoskins
14	Ryan Foster
15	<i>Name removed at request of submitter</i>
16	<i>Name removed at request of submitter</i>
17	Yohei and Hikari Ogawa
18	CLE Town Planning & Design (on behalf of GM Property)
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Late Submissions	Name
19	Department of Education
20	City of Armadale

Schedule 2

Summary of submissions and determinations

REFER TO THE SUBMISSIONS SECTION FOR A FULL COPY OF EACH WRITTEN SUBMISSION AND SUPPORTING INFORMATION

Submission: 1, 4, 5, 6

Submitted by: Department of Water and Environmental Regulation,
Department of Health, Department of Transport, Department of
Biodiversity, Conservation and Attractions

Summary of Submission: COMMENT

The above State Government agencies and infrastructure providers raise no objections, no comment or provide general comments on the amendment.

Planning Comment: Comments noted.

Determination: Submissions noted.

Submission: 2

Submitted by: Water Corporation

Summary of Submission: COMMENT

The Water Corporation is supportive of the decision to zone the land within the buffer as Urban Deferred. The Corporation will endeavour to keep the WAPC informed of plans for site and any impact that will have on the extent of the odour buffer.

Sewer: As noted in the consultant's report, a Type 40 Wastewater Pump Station will be required which is currently not funded in our 5 Year Capital Investment Program. The proponent will need to make a submission for it to be reconsidered.

Water: The subject area is located within the Armadale - Forrestdale PRV zone and can be supplied with reticulated water via extensions and modifications to the existing network. The 1400S trunk main in Forrest Road will need to be protected and have adequate clearance to retain access, this has been discussed with the developer.

Drainage: The Forrestdale MD Arterial Drainage Scheme specifies 10-year ARI and 100 year ARI storage volumes of 10,630 m³ and 14,120 m³ respectively for development of this Precinct. From the DWMS, the developer is proposing a 100 year storage volume of 12,770 m³. The shortfall in storage will need to be resolved between DWER, Water Corporation and the developer as part of the structure planning process.

Planning Comment: Comments noted. Refer to the "Urban Deferred zone" section of the report for discussion on these matters.

Determination: Submission noted.

Submission: 3

Submitted by: *Name removed at the request of submitter* (interested resident)

Summary of Submission: OBJECTION

We need to retain some of old Forrestdale and not overdevelop every single part. This plan doesn't add anything good to the area. Also, the CALM land is really important, and I hope it's not going to be turned into a park as the native animals really need it.

Planning Comment: Comments noted. Refer to the "Environmental Impacts" section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 7

Submitted by: David F James (interested resident)

Summary of Submission: OBJECTION

The submitter advises that they have lived in Forrestdale for a long time after having moved given land was acquired for consideration purposes. They help to look after the lake and other conservation reserves in the area.

The proposed amendment is causing uncertainty including where to find another property to live. The subject land and surrounding property have a lot of conservation attributes. Therefore, this amendment should be withdrawn.

The submitter is conservation minded and the protection of the existing values are a priority over development. The City of Armadale has an Urban Forest Strategy, which is to protect as many trees as they help reduce the effect of climate change etc. This year's summer heatwaves demonstrate the need to consider such matters.

The EPA mentions the value of the trees but doesn't recommend protection of all of them along Forest Road. It is recommended that they are protected.

Support the general position of the EPA and recognition of important environmental factors. However, the EPA omits matters such as midges and Bandicoots and their areas of habitat. The submitters has a resident population on their property. The Southern Brown Bandicoot, (Quenda) *Isoodon fasciventer* is a listed priority 4, near Threatened by the Department of Biodiversity, Conservation and Attractions.

This submission was supported by additional information.

Additional Information

As far as the 1970s to the 1980s the residents of the Forrestdale townsite and other properties around the lake have endured the annoyance of midge swarms on summer nights.

The midges are attracted to the street and house lights and with the townsite being so close to the lake, the residents have found these insects intolerable.

The southwest breeze on summer nights blows in a northeast direction into the town carrying with it the swarms of midges, making the residents very angry and demanding action to get rid of them. Several meetings were held at the Forrestdale Hall. The outcome of the meetings was the spraying of the lake with insecticide.

Unfortunately, one of these spraying events occurred when the lake was very shallow, and many migratory wading birds died as a result. From that ill-fated event, the current Lake Forrestdale Management Plan states that no spraying is permitted when the water is less than 300 mm deep. Some midges are still there depending on how long it takes for the lake to dry up. The proposed new amendment area is northeast of the lake and would be directly impacted by midge swarms. Because of the environmental impacts on this Ramsar listed wetland of International Importance, the lake should never be sprayed with toxic chemicals whatever the water depth.

The current Forrestdale townsite should never have been built so close to the lake. We do not want to repeat that mistake by allowing the proposed housing development which would also be too close to the lake. Please read the references below:

- Forrestdale Lake Nature Reserve Management Plan (2005).
- Chironomid Studies in Perth Wetlands, several reports by Murdoch University (1980s - 1990s). J A Davis et al.

Planning Comment: Comments noted. Refer to the “Environmental Impacts” section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 8, 15

Submitted by: *Names removed at the request of submitters* (interested residents)

Summary of Submission: SUPPORT

The submitters support the amendment.

Planning Comment: Support noted.

Determination: Submissions noted.

Submission: 9

Submitted by: Wendy Bishop (interested resident)

Summary of Submission: OBJECTION

Future development of this area will increase traffic along Armadale Rd and thereby vehicle pollution, including noise pollution.

It will necessitate the clearing of land of all vegetation (see current development projects in the area - Solaris, Mahala, Anstey Grove, Piara Waters, etc).

Advising the developers to “retain trees where possible” is a get out of jail free card in which they can say they couldn’t retain those trees. We see that over and over in these new projects.

We have Carnaby Cockatoos roosting in the area and have been for many years. Development of the area may discourage any roosting in the area because of the increased traffic, light pollution, cat predation, destruction of food sources and destruction of adequate roosting sites. Evening of 11 March I counted over 70 Carnaby Cockatoos roosting in the area.

Additional development of this area will have lasting effects on Forrestdale Lake. Wholesale clearing of the area will increase the ambient air temperature and increase water evaporation from the lake. The additional roads and homes will greatly reduce rainfall absorption.

Allowing developers to squeeze as many homes in as possible is also having effects on our children. The block size is often taken up completely by the home with no yard space for children to play in. No, recreation spaces do not and cannot take the place of room to play within a parent’s supervision. Parents cannot always afford the time to take the children down to the park to play. Our society complains that children are spending too much time on devices, but there is no area within the block for them to play outside.

The block size is also so small that there is no room to plant trees for shade. People are also very fearful that any tree they try to plant will have invasive roots and harm their foundations. Armadale Rd is already a nightmare in the afternoons traveling eastbound because of the new traffic lights. Traffic backs up to nearly Anstey Rd around 3 pm. Adding more people will only make the problem worse. Please consider that some areas need to be left underdeveloped. This is one of those areas.

Planning Comment: Comments noted. Refer to the “Environmental Impacts” section of the report for discussion on these matters.

It is noted that matters relating to potential traffic impacts are typically considered in the subsequent more detailed local structure planning stage (subject to public advertising) in consultation with the City of Armadale and relevant State Government agencies.

Determination: Submission dismissed.

Submission: 10

Submitted by: *Name removed at the request of submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter advises that this area has small acreage properties with livestock, hobby farms, agistment centres and a wellness/mediation centre. People live in this area to enjoy the rural lifestyle with space.

Any potential development would affect the close proximity of mature old growth trees that are habitat for multiple groups of Black Cockatoo species regularly roosting and feeding here.

The submitter wishes to protect Forrestdale from going from rural to urban zoning, more chance of potentially losing even more of what's left of rural Forrestdale.

What makes our small community unique with even more development? More development which is not wanted by the majority of the community and families not wanting to be displaced from their homes.

Losing the remaining mature eucalyptus trees that serve as roosting and feeding areas for our endangered Black cockatoos that are already under threat from habitat loss in the area that need the mature old growth trees to survive.

The environmental report needs to be redone as it is not accurate there are 13 mature trees on my property alone that I have personally witnessed and counted groups of 20 plus white tail and red tail Cockatoos regularly roosting in the evenings and feeding during the day.

There are also other wildlife present on property / and surroundings and in bushland that is not 'degraded ' such as Quenda, monitor goanna, bearded dragons, snakes such as dugite and tiger snake, boo books, owls ,kingfishers, honey eaters, butcher birds and other native bird species. This entire area is close proximity to Forrestdale Lake.

Thank you for reading this far. More time is needed for public submission and adequate advertising of such plus greater environmental impact reports done and area to stay rural to protect native wildlife.

This area is small acreage properties with livestock , hobby farms , agistment centres (are in short and a wellness/mediation centre. People in this area are living here to enjoy the rural lifestyle with space.

Any potential development would affect the close proximity mature old growth trees that are habitat for multiple groups of Black cockatoo species regularly roosting and feeding here.

Planning Comment: Comments noted. Refer to the “Environmental Impacts” section of the report for discussion on these matters.

It is noted that the amendment was advertised for the required 60 days in accordance with the former section 57 of the *Planning and Development Act 2005* and the EPA advised that the amendment did not require assessment and provided advice.

Determination: Submission dismissed.

Submission: 11

Submitted by: *Name removed at the request of submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter opposes the amendment as losing the remaining mature eucalyptus trees that serve as roosting and feeding areas for our endangered Black cockatoos that are already displaced and they need the mature old growth trees to survive.

Planning Comment: Comments noted. Refer to the “Environmental Impacts” section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 12

Submitted by: *Name removed at the request of submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter opposes the amendment as they have lived here for 37 years and our property is directly affected by this proposal. We don't want to lose our property and don't want our lifestyle to change. We have Lot of the endangered Carnaby's cockatoos frequenting our property and nesting in trees in the area.

Keep Forrestdale the way it is. Losing the remaining mature eucalyptus trees that serve as roosting and feeding areas for our endangered Black cockatoos that are already displaced and they need the mature old growth trees to survive.

Planning Comment: Comments noted. Refer to the "Environmental Impacts" section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 13

Submitted by: Timothy Hoskins (interested resident)

Summary of Submission: OBJECTION

The submitter opposes the amendment as they wish to keep the bushland and our community trees animals and beautiful nature in Forrestdale. The have lived here for 29 years and not a single thought or care has gone in the destruction and destroying everything for more houses more people please keep the bushland and it trees, please stop.

Planning Comment: Comments noted. Refer to the "Environmental Impacts" section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 14

Submitted by: Ryan Foster (interested resident)

Summary of Submission: OBJECTION

The submitter opposes the amendment as there are a significant amount of roosting black cockatoos, both Forrest red tail and white tail (Baudin or Carnaby) frequent the area on a daily basis.

Planning Comment: Comments noted. Refer to the "Environmental Impacts" section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 16

Submitted by: *Name removed at the request of submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter advises that the amendment will affect breeding of the local Black Cockatoos. Cannot afford to lose them. They take a long time to settle in an area.

Planning Comment: Comments noted. Refer to the “Environmental Impacts” section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 17

Submitted by: Yohei & Hikari Ogawa (interested residents)

Summary of Submission: OBJECTION

The submitter advises that Forrestdale is known for its amazing bushland and there are lots of wild animals that live there. There is also a primary school, that is surrounded by nature. Many students choose the school from outside of school district because of its unique and fascinate location.

The submitters kids love Forrestdale and they are proud of themselves raised up in such a brilliant place. We wish to protect this wonderful land to future generations.

Planning Comment: Comments noted. Refer to the “Environmental Impacts” section of the report for discussion on these matters.

Determination: Submission dismissed.

Submission: 18

Submitted by: CLE Town Planning + Design (on behalf of GM Property)

Summary of Submission: COMMENT

The submitter supports the principle of the land being developed for urban purposes as proposed by the amendment. However, request a change to the zoning approach initiated by the WAPC. Specifically, it is requested that the WAPC, on the advice of the DPLH, rezone the Urban Deferred portion of the amendment area direct to the Urban zone for the following reasons:

- It provides certainty of outcome that will enable more detailed planning for this land to progress in a coordinated manner and in conjunction with a future structure plan for the western Urban portion.

- It will require the Water Corporation to respond accordingly by ensuring that the location of any future wastewater infrastructure at their Haynes Road site east of Tonkin Highway is cited and designed in a way so as to not constrain important urban land.
- It will unlock additional land for circa 150 homes in a location that is affordable, has access to existing transport, utility services and community infrastructure. Rezoning the eastern portion to Urban will enable the land to be planned and delivered in association with the balance, creating efficiencies and economies of scale that assist to reduce development costs and make homes more affordable.
- Existing statutory buffers are in place east of Tonkin Highway to facilitate this outcome and this request does not shift the burden onto other land to a greater extent than what has already been planned for.

Background: CLE's request to initiate the amendment in March 2023 proposed to rezone the amendment area (with the exception of the Park and Recreation reservation on the western boundary) entirely to Urban.

Notwithstanding, the DPLH recommended to the WAPC that the eastern 8.9 hectares of the amendment area be held in the Urban Deferred zone pending confirmation of a potential odour buffer around the Water Corporation's future Water Resource Recovery Facility (WRRF) at lots 510 and 5060 Waterworks Road, Haynes. The WAPC resolved to initiate the amendment on that basis however, has the option of rezoning the land to Urban when it considers the outcomes of advertising and makes a recommendation to the Minister.

After the Amendment was initiated by the WAPC, GM Property and its consultant met with the Water Corporation to discuss the further studies needed to determine whether a future WRRF would be constructed on the site, and if so, whether it would generate the need for an offsite buffer west of Tonkin Highway. Based on the previous discussion with the Minister for Water, it was understood that this work would be prioritised and completed in a timely manner to coincide with the Amendment. However, subsequent written advice from the Water Corporation on 19 September 2023 advised that the Water Corporation would not:

1. Complete the necessary studies within at least the next two years; or
2. Commit a timeframe to complete same in the future.

As the timeframe to undertake the studies is unknown and extends beyond the time to finalise the Amendment, the Water Corporation will not be in a position to confirm changes or requirement for the buffer within the timeframe needed to inform the rezoning process.

The Water Corporation did, however, acknowledge that it would "accept that the WAPC will make a decision on acceptable uses in the buffer area that takes into consideration all the community's objectives". This is reasonable given that the buffer has been in place for nearly 3 decades for a yet-to-be-constructed WRRF, and one that is still on hold pending scoping studies.

The statement from the Water Corporation does not object to the planning for the land progressing in the absence of further studies defining a necessary buffer around a potential future WRRF. Instead, it acknowledges that the WAPC can make a strategic decision on the land which the Water Corporation will accept. We interpret this response as an indirect acknowledgement that future planning for the WRRF can respond and adapt to an Urban zoning over the entire Amendment area. We expect this stems from the ability for any future WRRF to be designed and cited so as to not generate the need for a buffer over the subject land. The reasons for this interpretation are discussed in detail below.

Planning for a Water Resource Recovery Facility at Lots 510 and 5060 Waterworks Road, Haynes: The ability to design around the amendment area: At approximately 30 hectares in area, the Water Corporation's (WC) Haynes Road site is large enough to accommodate future infrastructure without generating the need for a buffer over the amendment area.

Specifically, if a 500 metre separation distance was maintained from the most eastern boundary of the amendment area, approximately 18 hectares of land would remain for the Water Corporation to design a future WRRF.

Indicative concept layouts based on similar WC infrastructure prepared by our project engineer demonstrate that the 18 hectares of land outside a 500-metre buffer from the amendment area's eastern boundary is more than adequate to accommodate a future WRRF.

Potential to reduce the buffer: The notion of a 500-metre buffer was introduced in 1989 by the Health Department of Western Australia (Proposal for a Non Hazardous Industrial Liquid Wastes Treatment Plant at Forrestdale, August 1989) referencing the closest residential dwelling to the now de-commissioned Brookdale Liquid Waste Treatment Facility in their submission to the EPA.

The 500 metre buffer was reinforced in the 'Initial Planning' for a future (yet to be constructed) Westfield Recycling Water Treatment Plant (also referred to as Haynes Recycling Water Treatment Plant) in 1996, reflected in Water Corporation Plan DZ-30-2-2, and updated in 2022. We understand that the proposed buffer reflected a 1996 design for a treatment plant and the associated technology for the plant at the time.

The 500 m buffer has been reflected in the City of Armadale's Local Planning Scheme No. 4 (via Special Control Area No. 1) and informed strategic land use planning. Improvements in odour management technology since 1996 as well as a potential change in the function of the site is highly likely to result in the 500-metre buffer being excessive. Notwithstanding, for the purpose of this submission we have assumed that a 500-metre will be required for any future facility and our comments reflect this base assumption.

Land capability of western portion of Haynes Road Site: We understand that land abutting the western boundary has been previously used in various forms to treat wastewater since the 1960s (Attachment 3 – Site Timeline). An extract from Hansard dated 24 June 2010 indicates that an environmental audit of the site would be publicly released once all site investigations required to address the data gaps identified by the EPA had been complete. We have been unable to source the final EPA audit report confirming that the data gaps have been addressed and that the site has received environmental clearance post the de-commissioning of the Brookdale Plant. It would be important to determine if the land abutting the western boundary is environmentally suitable for ground disturbance. If it was not, development of any future WRRF would in all probability seek to avoid this area assuming that suitable alternatives exist.

In that event, land capability may preclude development of a future WRRF within 500-metres of the amendment area, negating the need for a buffer.

Potential impact of odour buffers on land outside the amendment area: The intent and focus of this submission is to demonstrate that a future WRRF at the Haynes Road site can be designed and implemented so as to not generate the need for an odour buffer over the amendment area. This would involve constructing the WRRF over the southern or eastern portion of the Haynes Road site, necessitating the need to consider potential buffer implications for the land east of Tonkin Highway.

In this regard, the Armadale Redevelopment Scheme No. 2 (AR2) establishes a 500-metre odour buffer around the Haynes Road site. AR2 confirms that sensitive land uses are not permitted within the buffer. The land to north of Armadale Road and within 500-metres of the site is zoned 'Industrial' under the MRS, meaning that zoning controls will preclude sensitive land uses from occurring within the industrial area.

Constructing a future potential WRRF on the southern or eastern portion of the Haynes Road site as advocated in this submission, has already been planned for, with a buffer reflected in the statutory planning framework.

Locating a WRRF as recommended will therefore not transfer the problem elsewhere and is a practical solution to unlocking valuable residential land within the amendment area.

Other factors: *After Corporation inaction and failure to plan accordingly:* The Water Corporation's planning and design for the site has not proceeded within the timeframe necessary to inform strategic land use planning. Even with a rezoning proposal imminent, the Water Corporation has advised that planning for the Haynes Road site will not commence in the next 2 years with no indication provided on when it may commence thereafter.

Given the current housing crisis which is expected to continue into the foreseeable future, the urban land within the amendment area is strategically too important to preclude residential development in the short-term. If an option exists to free up this land for residential development, then it should be pursued.

Rezoning the land directly to Urban as requested in this submission does not require a compromise or that the short-term supply of affordable housing be prioritised at the expense of the Water Corporation's infrastructure planning. Given the inherent design flexibility associated with the Haynes Road site as outlined above, the amendment area in its entirety is capable of being progressed for urban development without prejudicing the Water Corporation's future design and development of the Haynes Road site.

Inability to accommodate commercial 'non-sensitive' land uses within the buffer: The WAPC Amendment reports, states that consideration should be given to the potential for employment-generating land uses to occur within the buffer on the land Urban Deferred portion of the amendment area. Whilst this may be a suitable approach to managing land use conflict in a general sense, from a practical sense and when considering the context and a characteristic of the land, development for commercial purposes is not a desirable nor feasible outcome. The eastern Urban Deferred portion of the amendment area is not suitable for commercial development due to:

- The potential for land use conflict – incorporating commercial uses into a relatively small scale and confined precinct has the potential to detract from residential amenity in terms of noise, traffic and intensity of land use.
- Incompatible interface – there is no intuitive or logical separation between a residential precinct and commercial precinct - such as higher order roads or natural features - in this location. The interface would therefore need to be carefully planned and managed however, this would inevitably lead to a loss of valuable developable land and more land being required in local reserves as an interface response that would need to be managed by the City.

- Access constraints – the land within the buffer has no direct access to / from Armadale Road and only limited exposure. Access and exposure to higher-order roads are two critical factors in the success of a commercial precinct and this location has neither. It is therefore unlikely to commercially succeed and is better suited for residential purposes as an extension of the adjoining residential area and Forrestdale Townsite.
- Opportunity cost – a commercial land use outcome is likely to fail for the reasons outlined above. Pursuing a futile outcome will mean that approximately 150 dwellings would not be delivered towards assisting to solve the current housing crisis.
- Economies of scale – there will be substantial time and cost savings by developing the land for residential purposes in association with the adjoining land to the west with no cost to government i.e. the land does not require the construction, extension or upgrade of significant utility or road infrastructure.
- Demand - there is already an abundance of employment land to the north and south that is better placed, more accessible and planned for industrial purposes, providing development opportunities for business and local employment opportunities for residents.

Summary: For the reasons outlined in this submission, rezoning the Urban Deferred portion of the amendment area directly to Urban will not prejudice the Water Corporation’s future potential delivery of a WRRF at its Haynes Road site. The requisite statutory buffers have been planned for and exist east of Tonkin Highway to ensure that construction of a WRRF over the more eastern portion of the site does not have unintended consequences.

Zoning the land Urban will provide a clear direction from the WAPC to the Water Corporation that infrastructure planning can and should respond to the needs of the State – which at present is the delivery of affordable, well-located housing with good access to services, amenities and infrastructure. The expansion of Forrestdale Townsite East presents a compelling opportunity to work towards achieving the State’s housing objectives, with the Water Corporation’s preliminary advice to the submitter’s client indicating that they accept this as a potential outcome.

Planning Comment: Comments noted. Refer to the “Urban Deferred zone” section of the report for discussion on the modification of the amendment.

Determination: Submission upheld.

Submission: 19 (Late Submission)

Submitted by: Department of Education

Summary of Submission: COMMENT

The Department of Education (DoE) advises that as per *Operational Policy 2.4 – Planning for School Sites* (OP 2.4) a threshold of one public primary school site is required for every 1,500 dwellings. The DoE notes the proposed amendment does not specify the anticipated dwelling yield. However, the accompanying report states approximately 40.73 ha is designated for Urban and 8.9 ha for Urban Deferred, of which it is anticipated that both zones would provide for residential land use. Depending on the potential residential density within the subject area at future structure plan stage, public primary school site(s) would be required to service the area in accordance with OP 2.4.

The DoE has no in principle objections to the proposed amendment. The DoE requests to be engaged at the earliest possible opportunity during the preparation of future structure plans or other localised planning instruments to ensure it can suitably forward plan for the public education needs of the area.

Planning Comment: Comments noted. The proponent has been provided the DoE's comments for further consideration in the subsequent planning stages.

Determination: Submission noted.

Submission: 20 (Late Submission)

Submitted by: City of Armadale

Summary of Submission: SUPPORT

On 26 March 2024, the City of Armadale Council resolved to support the proposed amendment, as follows:

Advise the WAPC that the City supports MRS Amendment 1408/57 to rezone the Forrestdale Townsite East Urban Precinct to the Urban and Urban Deferred zones and the reservation of parts of the precinct for Parks and Recreation and Primary Regional Roads under the MRS as shown on the MRS Amendment Map 1408/57, subject to the following:

- A separate Town Planning Scheme Amendment being prepared for the precinct to enable the insertion of requirements to be addressed at Structure Planning and Subdivision stages of development of the area;
- The Urban Deferred zone being retained for the area affected by the buffer to the further Wastewater Treatment Plant until such time as Water Corporation have completed planning for the type and exact location of this facility and the final required buffer extent can be determined; and
- Corrections being made to the zoning plan for the MRS amendment as the plan incorrectly shows MRS zoning and reserves over the land on the eastern side of Tonkin Highway that is under the control of Development WA and is not zoned under the MRS.

The City and Council are very supportive of the proposal contained in the amendment to reserve the existing Leake Reserve as Parks and Recreation under the MRS and the reservation of other land currently in the Rural zone, which contains significant remnant vegetation, for Parks and Recreation under the MRS. The additional Parks and Recreation reserved land will enable the retention of remnant Banksia Woodland (a Threatened Ecological Community) but also many other mature trees and some Priority 3 classified Flora being *Jacksonia gracillima*. The extension of the Parks and Recreation reservation will also assist in the potential for establishment of an ecological corridor from the wetland in Leake Reserve down to Forrestdale Lake (a designated Ramsar wetland).

Council's resolution of 26 March 2024 also contained advice to the applicant with regard to future planning stages for the Forrestdale Townsite East future urban precinct as follows:

Advise the proponent to continue to liaise with the City in preparing applications and technical studies in support of a future amendment to TPS No. 4 and future structure plan including (but not necessarily limited to):

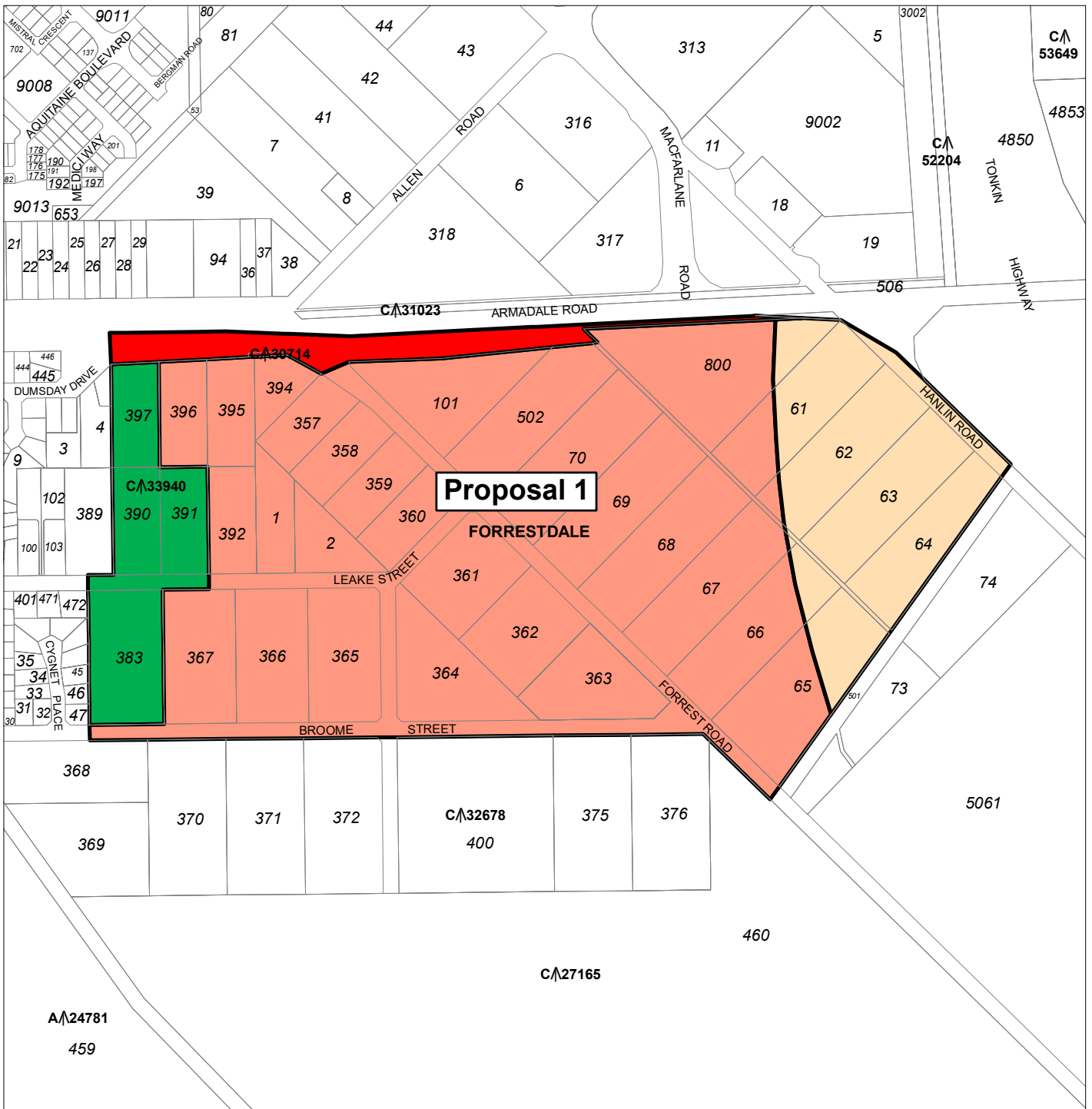
- a) Noise impact assessment related to Armadale Road and Tonkin Highway;
- b) Engineering Servicing Report;
- c) A Local Water Management Strategy;
- d) Environmental Impact Assessment including Flora and Fauna assessment and protection strategies where required;
- e) Retail Impact Assessment with regard to the proposed Local Centre;
- f) The buffer to the future Wastewater Treatment Facility that affects the precinct;
- g) Traffic Impact Assessment;
- h) Bushfire Hazard Assessment;
- i) Aboriginal Heritage Survey;
- j) A Sustainability Strategy that addresses retention of existing trees wherever possible, climate change, tree canopy, minimization of creation of urban heat islands and urban greening;
- k) Rationalisation of some of the smaller POS areas shown on the Concept Plan into larger POS areas. This is relevant for future maintenance considerations;
- l) Further information on the potential use and treatment of the road widening for Forrest Rd required by the Water Corporation for its infrastructure; and
- m) Advice on the Water Corporation's drainage corridor and interface with the future Urban area – removal of fencing between Drain and the proposed Road shown on the Concept Plan and planting of trees and shrubs within the proposed road reserve verge abutting the drain.

Planning Comment: Support noted. Refer to the "Urban Deferred zone" section of the report for discussion on the modification of the amendment. It has also been confirmed that the advertised amendment does not affect any land east of Tonkin Highway.

Determination: Submission noted.

Schedule 3

**Amendment Figure - Proposal 1
(as advertised)**



**Forrestdale Townsite East
Proposed minor amendment
as advertised**

19 July 2023

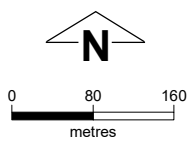
Proposal 1

- Proposed Amendment:
- Parks and recreation reservation
 - Primary regional roads reservation
 - Urban zone
 - Urban deferred zone

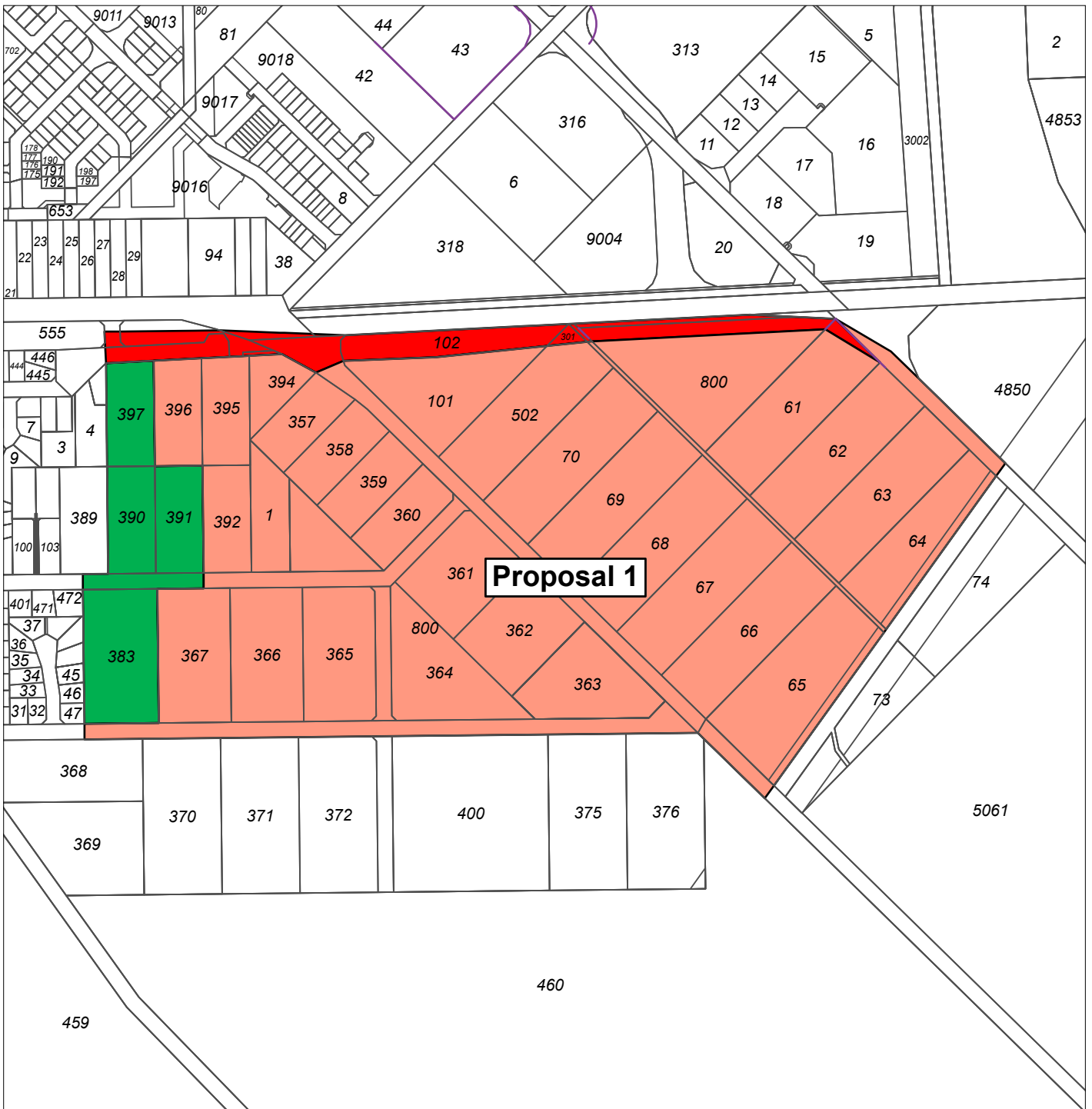
Oracle reference no: 4357
Version number: 3



Date: 19/06/2023
Produced by Data Analytics, Department of Planning, Lands and Heritage, Perth WA
Base information supplied by Western Australian Land Information Authority SLIP 1180-2020-1



Schedule 4
Amendment Figure - Proposal 1
(as modified)



**Forrestdale Townsite East
Proposed Minor MRS amendment
As Modified**

17 July 2024

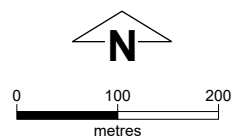
Proposal 1

Proposed Amendment:

- Rural zone to Parks and recreation reservation
- Rural zone to Primary regional roads reservation
- Rural zone to Urban zone

Ref no: 4357

Version number: 6



Appendix A
List of plans
(as advertised)

**Metropolitan Region Scheme
Amendment 1408/57**

Forrestdale Townsite East

as advertised

Amending Plan 3.2813

Detail Plans

1.6603, 1.6622

Appendix B
List of plans
(as modified)

**Metropolitan Region Scheme
Amendment 1408/57**

Forrestdale Townsite East

as modified

Amending Plan 3.2813/1

Detail Plans

1.6603, 1.6622

Submissions

From: Jim Mackintosh <jim.mackintosh@dwer.wa.gov.au>
Sent: Monday, 22 January 2024 1:39 PM
To: Region Planning Schemes
Subject: RE: Proposed Metropolitan Region Scheme Amendment 1408/57 - South Forrestdale Townsite East (City of Armadale) - RLS/1106
Attachments: RE: Proposed MRS Amendment - Forrestdale Townsite East (H22013Av3/04 August 2023)

OFFICIAL

Dear DPLH,

Thank you for the above referral. The Department of Water and Environmental Regulation has considered the proposal and has no objections and no further comments as the supporting District Water Management Strategy (Hyd2o, Aug 2023) has been previously endorsed by the Department (as per attached email).

Regards

Jim Mackintosh

Department of Water and Environmental Regulation

Program Manager

Swan Avon Region

Planning Advice Section

T 08 6250 8043 |

E jim.mackintosh@dwer.wa.gov.au

Visit our website www.dwer.wa.gov.au

From: Jim Mackintosh <jim.mackintosh@dwer.wa.gov.au>
Sent: Wednesday, 30 August 2023 9:50 AM
To: Sasha Martens; Anthony Muscara
Cc: Bree Lyons
Subject: RE: Proposed MRS Amendment - Forrestdale Townsite East (H22013Av3/04 August 2023)

Thanks Sasha.

Anthony – the Department of Water and Environmental Regulation (DWER) is now satisfied with the DWMS for the above proposal and it can be considered ‘endorsed’ by DWER.

Regards

Jim Mackintosh

Department of Water and Environmental Regulation

Program Manager

Swan Avon Region

Planning Advice Section

T 08 6250 8043 |

E jim.mackintosh@dwer.wa.gov.au

Visit our website www.dwer.wa.gov.au

From: Sasha Martens <sasha@hyd2o.com.au>
Sent: Tuesday, August 29, 2023 8:56 PM
To: Jim Mackintosh <jim.mackintosh@dwer.wa.gov.au>; Anthony Muscara <Anthony.Muscara@dplh.wa.gov.au>
Cc: Bree Lyons <bree.lyons@dwer.wa.gov.au>
Subject: RE: Proposed MRS Amendment - Forrestdale Townsite East (H22013Av3/04 August 2023)

Hi Jim and Anthony,

As requested, please find attached Water Corporation’s in-principle support for the DWMS.

Please note that Water Corporation’s assessment was based on the latest version (H22013Av3, 4 August 2023) containing the recent DWER requested updates, which we forwarded for their review/consideration.

Regards,
Sasha

Sasha Martens

Principal Engineering Hydrologist

hyd2o hydrology

Suite 1, 387 Hay St Subiaco WA 6008
PO Box 1055, Subiaco WA 6904
p +61 8 9382 8683 | f +61 8 6380 1910 | m 0419 510 073



From: Jim Mackintosh <jim.mackintosh@dwer.wa.gov.au>
Sent: Wednesday, August 23, 2023 11:14 AM
To: Sasha Martens <sasha@hyd2o.com.au>
Cc: Bree Lyons <bree.lyons@dwer.wa.gov.au>; Anthony Muscara <Anthony.Muscara@dplh.wa.gov.au>
Subject: RE: Proposed MRS Amendment - Forrestdale Townsite East (H22013Av3/04 August 2023)

Dear Sasha,

Thank you for the referral of the updated Forrestdale Townsite East DWMS, dated August 2023. The DWER has reviewed the revised document and provides the following repeat comment:

The DWMS must be referred to the Water Corporation for review. If you are unaware if this has occurred then you need to seek clarification on this from DPLH, the applicant or the Planning consultants. If this has not occurred then it should occur immediately. The DWER will not provide endorsement of the DWMS until Water Corporation has been consulted and record of this provided to DWER.

Regards

Jim Mackintosh

Department of Water and Environmental Regulation

Program Manager

Swan Avon Region

Planning Advice Section

T 08 6250 8043 |

E jim.mackintosh@dwer.wa.gov.au

Visit our website www.dwer.wa.gov.au

From: Jim Mackintosh
Sent: Wednesday, July 26, 2023 1:02 PM
To: Anthony Muscara <Anthony.Muscara@dplh.wa.gov.au>
Cc: Bree Lyons <bree.lyons@dwer.wa.gov.au>
Subject: FW: Proposed MRS Amendment - Forrestdale Townsite East

Dear Anthony,

The Department of Water and Environmental Regulation has now reviewed the South Forrestdale - District Water Management Strategy (DWMS). The DWMS is considered to be deficient and comments that must be addressed in a revised document are in the attached advice.

Regards

Jim Mackintosh

Department of Water and Environmental Regulation

Program Manager

Swan Avon Region

Planning Advice Section

T 08 6250 8043 |

E jim.mackintosh@dwer.wa.gov.au

Visit our website www.dwer.wa.gov.au

From: Bree Lyons <bree.lyons@dwer.wa.gov.au>
Sent: Monday, June 19, 2023 3:24 PM
To: Anthony Muscara <Anthony.Muscara@dplh.wa.gov.au>
Cc: Jim Mackintosh <jim.mackintosh@dwer.wa.gov.au>
Subject: RE: Proposed MRS Amendment - Forrestdale Townsite East

Hi Anthony,

The DWMS is currently being assessed by our Urban water Branch and they will endeavour to get their comments to us as soon as practicable.

Kind regards,

Bree Lyons
Senior Natural Resource Management Officer
Swan Avon Planning Advice

Please note I work Monday and Wednesday

Department of Water and Environmental Regulation
Swan Avon Region
7 Ellam St, Victoria Park, WA 6100
T: (08) 6250 8035 | F: (08) 6250 8050
E: bree.lyons@dwer.wa.gov.au | www.dwer.wa.gov.au
Twitter: [@DWER_WA](https://twitter.com/DWER_WA)

From: Anthony Muscara <Anthony.Muscara@dplh.wa.gov.au>
Sent: Monday, June 19, 2023 3:11 PM
To: Bree Lyons <bree.lyons@dwer.wa.gov.au>
Subject: Proposed MRS Amendment - Forrestdale Townsite East

Hi Bree,

Just checking of the DWMS has been approved by DWER.

Thanks,

Anthony Muscara
Principal Planner | Land Use Planning
Department of Planning, Lands and Heritage
140 William Street, Perth WA 6000
wa.gov.au/dplh | 6551 9441 | |



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Development
Services

629 Newcastle Street
Leederville WA 6007

PO Box 100
Leederville WA 6902

T (08) 9420 2099
F (08) 9420 3193



Your Ref: RLS/1106
Our Ref: MRS405964
Enquiries: Daniel Lawrence
Direct Tel: 9420 3257
Email: land.planning@watercorporation.com.au

19 January 2024

Department of Planning Lands and Heritage
Locked Bag 2506
PERTH WA 6001

Attention of: Anthony Muscara

Re: Forrestdale Townsite East

Thank you for your email dated 15 January. We offer the following comments regarding this proposal.

The Corporation notes the decision to zone the land within the buffer as Urban Deferred and is supportive of this decision, we will endeavor to keep the Department informed of plans for site and any impact that will have on the extent of the odour buffer.

Sewer

As noted in the report, a Type 40 Wastewater Pump Station will be required which is currently not funded in our 5 Year Capital Investment Program. The proponent will need to make a submission for it to be reconsidered.

<https://www.watercorporation.com.au/-/media/WaterCorp/Documents/Developing-and-Building/Land-planning/Capital-investment-planning-checklist.pdf>

Water

The subject area is located within the Armadale - Forrestdale PRV zone and can be supplied with reticulated water via extensions and modifications to the existing network.

The 1400S trunk main in Forrest Rd will need to be protected and have adequate clearance to retain access, this has been discussed with the developer.

Drainage

The Forrestdale MD Arterial Drainage Scheme specifies 10 year ARI and 100 year ARI storage volumes of 10,630m³ and 14,120m³ respectively for development of this Precinct. From Figure 8 in the DWMS, the developer is proposing a 100 year storage volume of 12,770m³. The shortfall in storage will need to be resolved between DWER, Water Corporation and the developer as part of the Structure Planning process.

Should you have any queries or require further clarification on any of the above issues, please do not hesitate to contact the Enquiries Officer.

Daniel Lawrence
Development Services

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-02-11 15:55:12

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

We need to retain some of old forrestdale and not overdevelop every single part. This plan doesn't add anything good to the area. Also the CALM land is really important and I really hope it's not going to be turned into a park as the native animals really need it.

File 1:

No file uploaded

File 2:

No file uploaded

File 3:

No file uploaded



Your Ref: 1408/57

Our Ref: F-AA-90444-25; D-AA-24/10220

Contact: System Performance 9222 2000

Ms Lainy Collisson
Senior Planning Support Officer
Department of Planning, Lands and Heritage
Level 6, 61 Victoria Street
BUNBURY WA 6230

Attention: Mr Anthony Muscara

Via email: Lainy.Collisson@dph.wa.gov.au

Dear Ms Collisson

**RE: PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1408/57 -
FORRESTDALE TOWNSITE EAST - CITY OF ARMADALE**

Thank you for your email dated 15 January 2024 requesting comments from the Department of Health (DoH) on the above proposal. The DoH provides the following comment:

1. *Water Supply and Wastewater management*

The proposal for connection to the Water Corporation schemes (Water and Wastewater) is supported by the DoH for the Urban Zone. This support does not extend to the Urban Deferred zone.

2. *Medical entomology*

The subject land is in a region that regularly experiences significant problems with nuisance and disease carrying mosquitoes. These mosquitoes can disperse several kilometers from breeding sites and are known carriers of Ross River (RRV) and Barmah Forest (BFV) viruses. Human cases of RRV and BFV diseases occur in this general locality. The subject land is also within 3km of mosquito dispersal distance from mosquito breeding sites within the Forrestdale Lake Nature Reserve. Mosquitoes will disperse from these sites to the subject land under favorable environmental conditions. There may also be seasonal freshwater mosquito breeding habitat in low-lying adjacent land or other waterbodies (ephemeral or permanent). Additionally, there is the potential for mosquitoes to breed in on-site infrastructure during development and constructed water bodies if they are not designed to manage this risk.

These disease risks, as well as the lifestyle impacts of nuisance mosquitoes, will inevitably result in demands for the application of chemicals to control larval and/or adult mosquitoes in the future. Environmental agencies may not automatically approve the use of such measures in and around environmentally significant wetlands. Therefore, it will be important that in-principle approval for effective mosquito control measures in and around these wetlands is obtained from the relevant environmental agencies before planning decisions are finalised.

Prior to future development resulting from the rezoning, DoH recommends the following:

- Development of a mosquito management plan to be approved by both DoH and City of Armadale to ensure the risk to the community of exposure to nuisance and/or disease carrying mosquitoes is considered. Guides and templates to assist land developers meet these requirements are available at: [Mosquito management \(health.wa.gov.au\)](https://www.health.wa.gov.au/mosquito-management)
- Due to the high-risk nature of development resulting from the rezoning, the following wording shall be placed on all future land title documents:

"This lot is located near mosquito breeding habitat and can experience substantial numbers of nuisance mosquitoes after certain environmental conditions. The mosquito species in the region are known vectors of Ross River virus and other mosquito-borne diseases and the region is subject to outbreaks of these diseases."

3. Chemical Hazards

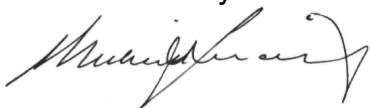
It is understood that Water Corporation may redevelop the former Hayes Wastewater Treatment Plant site for new wastewater treatment facilities which is within 200m of the proposed development area. The Environment Protection Authority (EPA) (2005) guidelines "*Separation Distances between Industrial and Sensitive Land Uses*" (Section 2.1) recommends appropriate separation/buffer distances that should be established around land-uses where they may be significant offsite impacts, including wastewater treatment plants.

Therefore, it is recommended that potential off-site impacts (dust/fumes, noise, light and groundwater impacts) from any proposed waste treatment plant be considered, prior to determining the suitability of the site for the current rezoning, to minimise the impacts and public health risks arising from any encroachment of incompatible land-uses in the future.

The Department of Water and Environmental Regulation (DWER) should clear all future subdivisions, to ensure that they are suitable for proposed land-uses regarding the potential for contamination prior to further approvals. The proponents must be informed of the potential for further investigations before full support is provided for future land-use plans.

Should you have any queries or require further information please contact System Performance on 9222 2000 or eh.eSubmissions@health.wa.gov.au.

Yours sincerely



Dr Michael Lindsay
EXECUTIVE DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE

15 February 2024

From: Nugraha, Yohan <Yohan.Nugraha@transport.wa.gov.au>
Sent: Wednesday, 21 February 2024 2:10 PM
To: Region Planning Schemes
Cc: Golestani, Shanthi
Subject: Proposed Metropolitan Region Scheme Amendment 1408/57 - South Forrestdale Townsite East (City of Armadale) - RLS/1106

Follow Up Flag: Follow up
Flag Status:

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Your ref: RLS/1106

Our ref: DT/24/00326

Enquiries: Yohan Nugraha (6551 6103)

Ms Sam Boucher
Secretary
Western Australian Planning Commission
140 William St, Perth WA 6000
By email: regionplanningschemes@dph.wa.gov.au

Attn: Anthony Muscara

Dear Ms Boucher

RE: PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1408/57 - SOUTH FORRESTDALE TOWNSITE EAST

Thank you for your email dated 15 January 2024 inviting the Department of Transport (DoT) to provide comment on the above proposed development. The Urban Mobility (UM) division of DoT have reviewed the submitted documents and advise that, given the nature of the proposed amendments, DoT support the proposal in principle and notes the following:

- The Amendment Area has a local route and abuts primary routes in the Long Term Cycling Network (LTCN), and opportunities should be identified to provide cycling connections to the longer-term cycling network in subsequent stages of planning and development.

We understand Main Roads WA and Public Transport Authority will send responses directly.

Thank you for the opportunity to provide comments for the above application. If you have wish to follow up on any of these matters, please do not hesitate to contact me on 6551 6103.

Kind regards,

Yohan Nugraha
Senior Transport Design Engineer|Integrated Transport Planning|Department of Transport
Tel: (08) 65516103
Email: Yohan.Nugraha@transport.wa.gov.au|Web: www.transport.wa.gov.au



We acknowledge the Traditional Custodians of this land and pay respect to the Elders past and present.

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Department of **Biodiversity,
Conservation and Attractions**

Submission 006



Your ref: RLS/1072
Our ref: 2017/003465 (PRS 50352)
Enquiries: Catherine Prideaux
Phone: 08 9442 0300
Email: Catherine.Prideaux@dbca.wa.gov.au

Ms Marija Bubanic
Acting Manager Regional Scheme Administration
Land Use Planning
Department of Planning, Lands and Heritage
140 William Street
PERTH WA 6000

Dear Ms Bubanic

PROPOSED METROPOLITAN REGION SCHEME AMENDMENT – SOUTH FORRESTDAL EAST - REQUEST FOR PRELIMINARY COMMENT

I refer to the email dated 27 March 2023 requesting preliminary comment on the proposed amendment to rezone the above site encompassing 54 hectares, from 'Rural' to 'Urban' and 'Parks and Recreation' in the Metropolitan Region Scheme (MRS).

Planning context

The proposed amendment area is separated from Bush Forever Site 345 (*Forrestdale Lake and Adjacent Bushland, Forrestdale*) by properties on the south side of Broome Street which are not included in the MRS amendment. Forrestdale Lake Nature Reserve, located to the south west of the amendment area, is managed by DBCA. Forrestdale Lake is a Ramsar Site (part of Forrestdale and Thomsons Lake Ramsar Site), and it is listed in the Directory of Important Wetlands.

The proposed amendment area is located within the Southern River / Forrestdale / Brookdale / Wungong District Structure Plan (DSP). The DSP shows the central part of the proposed amendment area as 'Urban' with areas of 'Rural Living and Semi-Rural Living' in proximity to Forrestdale Lake Nature Reserve. The *Perth and Peel @ 3.5 Million* (DPLH and WAPC, 2018) and the *South Metropolitan Peel Sub-regional Planning Framework* (DPLH, 2018) identifies the proposed amendment area as Urban Expansion with the eastern portion being Urban Investigation. The CLE report states on page 26 that the urban investigation area corresponds with a buffer associated with a defunct liquid waste treatment facility.

Flora and Vegetation Assessment

A *Flora and Vegetation Assessment Forrestdale Land Development* (Focused Vision Consulting, 2023) is included in the amendment documentation. DBCA notes that the timing of the flora surveys on 30 November 2021 and 26 October 2022 were not ideal for some threatened species however the degraded vegetation condition over much of the site indicates that the likelihood of threatened orchids such as *Caladenia huegelii* and *Drakaea elastica* occurring is low.

Swan Region
Cnr Australia II Drive and Hackett Drive, Crawley WA 6009
Locked Bag 104, Bentley Delivery Centre, Western Australia 6983
catherine.prideaux@dbca.wa.gov.au
www.dbca.wa.gov.au

The entire proposed amendment area is within an Environmentally Sensitive Area as it is within the buffer area to occurrences of clay pan threatened ecological communities (TECs) nearby. DBCA notes that a total of 24 vegetation units were defined and mapped across the study area however the vegetation assessment did not include an analysis of the floristic community types (FCT) or alignment of vegetation to FCTs.

As there are occurrences of clay pan TECs nearby DBCA recommends FCT analysis of the data in accordance with [Methods for survey and identification of Western Australian threatened ecological communities. Draft for consultation. Version 2: 21 December 2021. \(dpaw.wa.gov.au\)](https://www.dpaw.wa.gov.au), to ensure significant ecological communities are adequately considered in future planning. All TEC occurrences and their supporting habitat should be protected within conservation reserves at local structure planning stage.

The EPA Technical Guidance advises that DBCA should be consulted regarding information for determining TECs and PECs so that notes on survey and analysis methods for determining FCTs on the southern Swan Coastal Plain can be provided.

Vegetation Extent Remaining

DBCA has noted discrepancies in the Focused Vision Consulting report in relation to the remaining extent of the Southern River vegetation complex (*Heddle et al.* 1990). The last sentence on page 15 states that the Southern River Complex does not fall below the 10% retention threshold and therefore the remaining extent meets the EPA objective of retention for the purpose of biodiversity conservation. However, on page 53 it states that vegetation association 1001 in the study area is represented by less than 10% of the original extent on the Swan Coastal Plain IBRA Region, Perth Sub-region and within the City of Armadale. Therefore, vegetation units associated with this vegetation association are of regional significance due to this factor, and this is detailed in Table 19.

Advice should be sought from the Department of Water and Environment Regulation in relation to its objective to protect flora and vegetation so that biological diversity and ecological integrity are maintained. The EPA considers it important that vegetation associations are maintained above a threshold of 10% for constrained areas such as this within the Perth metropolitan area.

Wetlands

The proposed amendment area includes wetlands mapped within the *Geomorphic wetlands of the Swan Coastal Plain* dataset. Conservation category wetland (CCW) UFI 13140 is contained within Crown Reserve 33940 which is vested with the City of Armadale (Lots 390, 391 and 397). Crown Reserve 33940 is proposed to be rezoned from Rural to Parks and Recreation in the MRS amendment.

The proposed amendment from Rural to Parks and Recreation also includes an unmade portion of Leake Street and Lot 383 Broome Street. The *Request for Rezoning – Metropolitan Region Scheme Amendment - Forrestdale Townsite East, Forrestdale* prepared by CLE Town Planning and Design (March 2023) explains that this is based on the findings of the detailed flora and fauna survey which found that vegetation on this land comprised wetland characteristics like conservation category wetland UFI 13140 (page 25).

The CLE report includes a Development Concept Plan (Figure 6). The Plan indicates that the 50-metre buffer to the CCW will be within Public Open Space. The requirement for revegetating this buffer is considered appropriate through the preparation of a wetland management plan, to protect the wetland values and guide future management. The plan should be prepared at the local structure plan and/or subdivision stages of the project, in consultation with the City of Armadale, as the future manager of public open space reserves.

Stormwater Management

Following review of the *South Forrestdale District Water Management Strategy* (DWMS) (Hyd2o Hydrology, March 2023) it is noted that surface and groundwater water from the site flows away from Forrestdale Lake, draining into the Forrestdale Main Drain and Baileys Branch Drain to the north and east. It is also noted that groundwater monitoring undertaken so far indicates a mean pH of 3.2 – 6.48, with high nutrient concentrations.

The Stormwater Management Plan (Figure 9 of the DWMS) shows the proposed location of 1% AEP storage and biofiltration areas for each catchment. Advice should be sought from the Department of Water and Environmental Regulation regarding the consistency of the DWMS with '*Better Urban Water Management* (DoW 2008)'.

The DWMS commits to the development and implementation of a Local Water Management Strategy as part as part of the local structure planning process.

Development within Bush Fire Prone Area

It is DBCA's expectation that the applicant, the City of Armadale and the WAPC will comply with State Planning Policy 3.7 *Planning for Bushfire Prone Areas* so that adequate separation is provided between residences and the neighbouring bushland areas. Bushfire mitigation measures are to be contained within the development area and must not place impositions or reliance upon the management of adjoining conservation areas, including the buffer to the CCW UFI 13140 that requires rehabilitation, by the City of Armadale or DBCA, for addressing bushfire risk.

Matters of National Environmental Significance

The proposed amendment area contains matters of national environmental significance (MNES) protected under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). These include habitat for threatened black cockatoo species and the Banksia woodlands of the Swan Coastal Plain threatened ecological community, as described in the *Approved Conservation Advice (incorporating listing advice) for the Banksia Woodlands of the Swan Coastal Plain Ecological Community* (Department of the Environment and Energy, 2016). The proponent should be advised to contact the Commonwealth Department of Climate Change, Energy, the Environment and Water to discuss any assessment requirements.

Should you wish to discuss any of the comments provided please contact Planning Officer Catherine Prideaux of this office on telephone 9442 0300, or by email at catherine.prideaux@dbca.wa.gov.au in the first instance.

Yours sincerely



Benson Todd
REGIONAL MANAGER

19 April 2023

Midges at Lake Forrestdale

Back as far as the 1970s to the 1980s the residents of the Forrestdale townsite and other properties around the lake have endured the annoyance of midge swarms on summer nights. The midges are attracted to the street and house lights and with the townsite being so close to the lake, the residents have found these insects intolerable.

The southwest breeze on summer nights blows in a northeast direction into the town carrying with it the swarms of midges, making the residents very angry and demanding action to get rid of them. Several meetings were held at the Forrestdale Hall. The outcome of the meetings was the spraying of the lake with insecticide. Unfortunately one of these spraying events occurred when the lake was very shallow, and many migratory wading birds died as a result.

From that ill-fated event, the current Lake Forrestdale Management Plan states that no spraying is permitted when the water is less than 300mm deep. Some midges are still there depending on how long it takes for the lake to dry up. The proposed new amendment area is northeast of the lake and would be directly impacted by midge swarms. Because of the environmental impacts on this Ramsar-listed wetland of International Importance, the lake should never be sprayed with toxic chemicals whatever the water depth.

The current Forrestdale townsite should never have been built so close to the lake. We do not want to repeat that mistake by allowing the proposed housing development which would also be too close to the lake.

Please read the references below:

- Forrestdale Lake Nature Reserve Management Plan (2005).
- Chironomid Studies in Perth Wetlands, several reports by Murdoch University (1980s – 1990s). J A Davis et al.

This is part of my submission on the Metropolitan Region Scheme Amendment 1408/57 (Minor Amendment) Forrestdale Townsite East.

D F James
66 Leake Street
Forrestdale WA 6112

5.3.2024



Section 57 Amendment (Minor)

Form 57

Submission

Metropolitan Region Scheme Amendment 1408/57

Forrestdale Townsite East

OFFICE USE ONLY

SUBMISSION NUMBER

To: Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

RLS/1106

Title (Mr, Mrs, Miss, Ms) *Mr* First Name *David*
Surname *James* (PLEASE PRINT CLEARLY)
Address *(Lot 360) 66 Leake street Forrestdale* Postcode *6112*
Contact phone number *9397 0276* Email address *castiarina@gmail.com*

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? Yes No

Submission (Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

Dear Sir - Madam, Thank you for accepting this submission. We have lived in Forrestdale for a long time, and after having sold Lot 84 Commercial rd in 2015 to the Government for conservation, we moved here to lot 360 Forrestdale. This suited us well, as we always wanted to keep living in Forrestdale in semi-rural land near our precious lake and all the other conservation reserves in the area we help to look after.

This proposed amendment that includes our property is making our life quite stressful - not knowing the future for us - or where we would find another place in Forrestdale to live, if we had to go! Our property in Leake St and surrounding neighbours have a lot of conservation attributes - which I discuss below in detail. For these reasons we say this proposed amendment should be withdrawn.

turn over to complete your submission

Being very conservation minded for our district, we put protection of existing values priorities over further urban expansion into this proposed amendment area.

The city of Amadale has a Urban Forest Strategy, to protect as many trees as possible within its jurisdiction. We fully support the city in this project. Established trees, be they exotic or native - help reduce the effect of climate change - shade - wildlife habitat - carbon take up - absorbing pollution etc. This current summer heatwave clearly demonstrates the urgency of this predicament, to do positive things, to help prevent it getting worse. We need to live in hope - not in despair for the future. (See attached sheet enclosed) A full report is available from the City of Amadale.

The EPA in its report to the WAPC does mention the value of trees - but doesn't recommend the protection of all the trees (River Red Gums) that dominate several lots along both sides of Forrest road. We certainly want those trees protected.

We support the general EPA overall report and its recognition of Important Environmental Factors of the area - but it does omit some other important issues like Midgee on Lake Forrestdale (see attached sheet of this submission) and Bandicoots and their areas of habitat. We have a resident population on our place - that connects up with Lake Forrestdale NR via Napier st bush strip and Lot 364 Banksia Woodland. See further details in attached map of this submission.

The southern brown bandicoot (Quenda) Isodon fusciventer is listed as priority 4, Near Threatened by the Department of Biodiversity Conservation and Attractions (WA).

Please consider the points raised in this submission.

Thank you!

Signature: D-F Jam

Date 5-3-2024

B1 Vision and Aims

The vision of the City of Armadale Urban Forest Strategy is to strengthen a diverse landscape character through allocating suitable tree diversity, to be proactive in appropriate landscape planning while showcasing the city's botanic heritage and to distinguish an expanding 'tree change' destination from the existing Perth vernacular.

To guide this vision, the key aims of the Urban Forest Strategy are:

1. To strengthen and manage the CoA's urban forest in recognition of the diverse landscape characters

- Inform suitable tree canopy cover for nominated landscape character precincts,
- Provide diversity of tree genus and species suitable for purpose within nominated landscape character precincts,
- Suggest tree species that provide longevity, appropriate for position including succession planting and able to support existing landscape character whilst acknowledging best practice 'firewise' urban forest landscape planning within Armadale's peri-urban fire-prone precincts.

2. Collaborate, engage and educate the local community

- Shifting reliance to a collaborative approach, that fosters and supports shared responsibility to provide appropriate urban forest for future generations,
- Foster shared responsibility towards best practice 'firewise' urban forest landscape planning,
- Within every landscape character precinct proudly showcase the CoA's 'tree change' diversity and lifestyle.

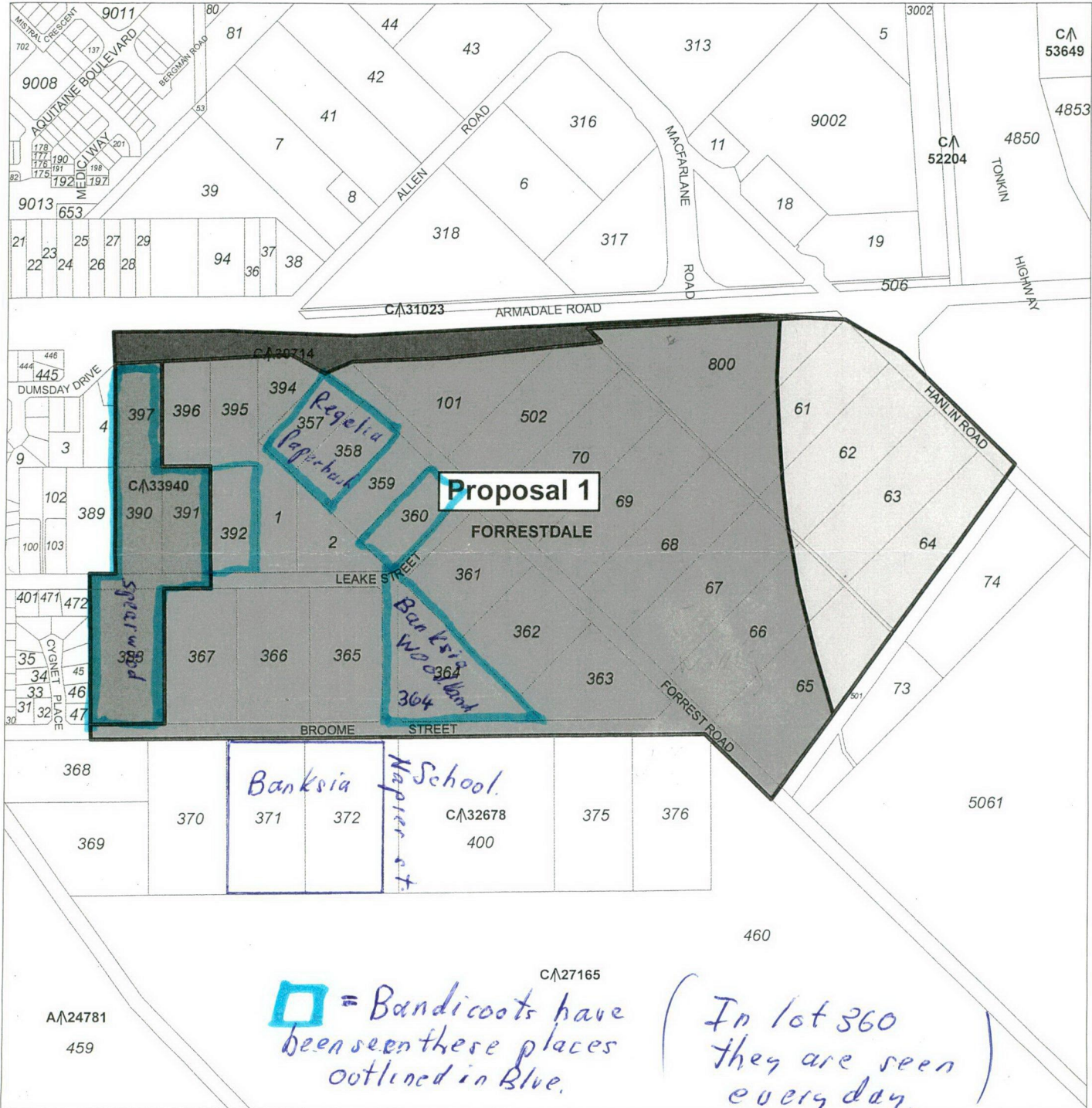
3. Coordinate urban forest planning and management into a strategic guiding document. The Urban Forest Strategy aims to;

- Inform planning policy, strategic and urban guidelines;
- Implement / supplement and undertake succession planting appropriate to landscape character situation;
- Encourage backyards and private areas to contribute to the urban forest, whilst educating and acknowledging best practice 'firewise' landscape planning with regard to urban forest implementation and management; and;
- Develop shared governance and responsibility through ongoing urban forest implementation, maintenance and landscape planning management strategies.

From
D.F James
66 Leake st
Forrestdale 6112
5th March 24

Supporting my submission
On MRS Armadale 1408/57
Forrestdale Townsite East

The list of Lot Numbers
that I recommend and
qualify as "Urban Forest".
Lots 365 - 364 Broome st,
Lots 101 - 502-70-69-68
360-361 Forrest rd
and part Lot 800 Armadale rd.



□ = Bandicoots have been seen these places outlined in Blue.

(In lot 360 they are seen every day.)

**Forrestdale Townsite East
Proposed minor amendment
as advertised**

19 July 2023

Proposal 1

Proposed Amendment:

- Parks and recreation reservation
- Primary regional roads reservation
- Urban zone
- Urban deferred zone

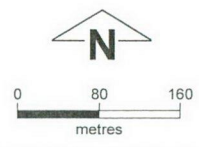
From
 D F James
 (Lot 360) 66 Leake st
 Forrestdale
 6112

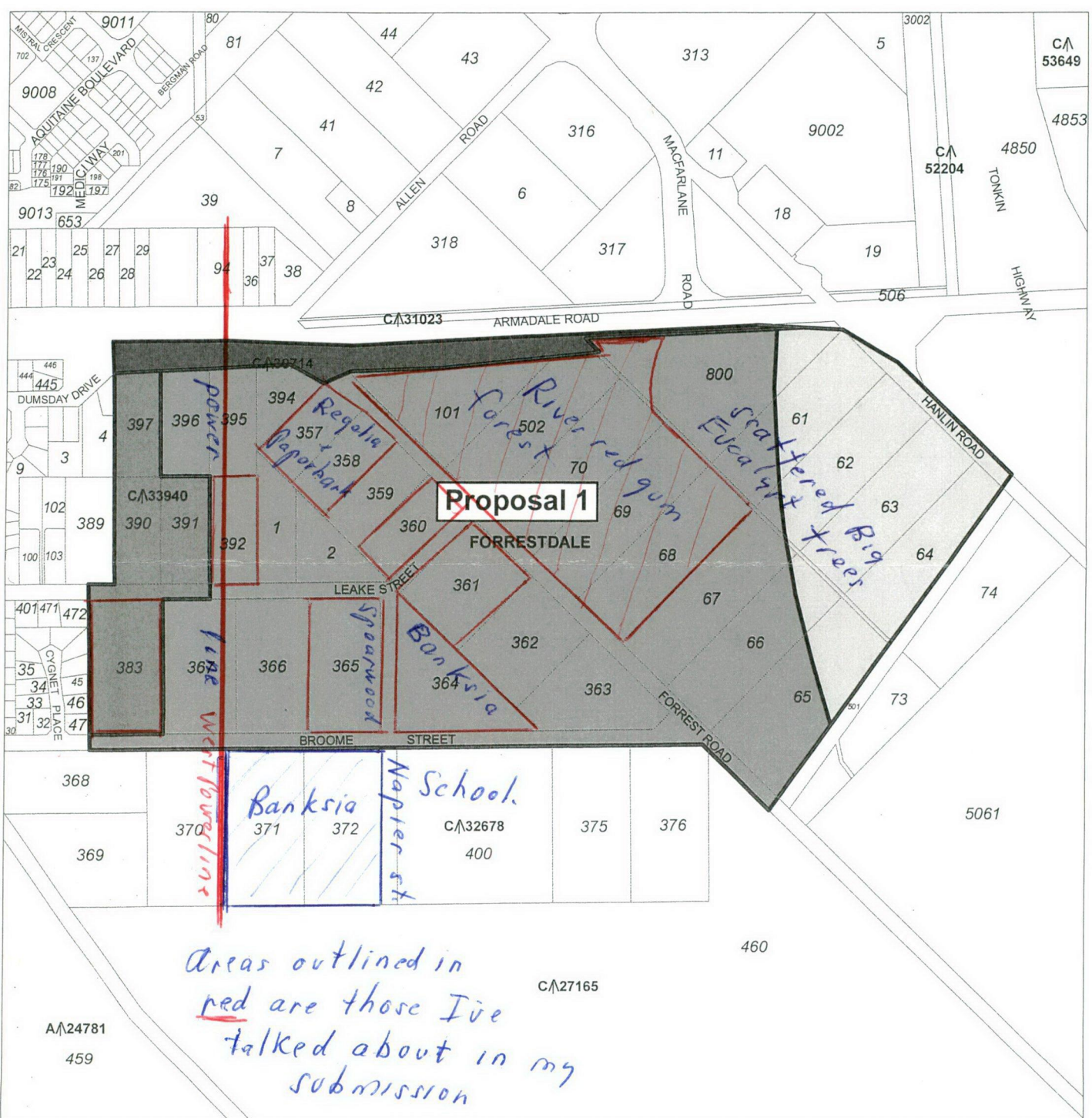
Supporting my
 submission on
 MRS Amendment
 1408/57
 Forrestdale Townsite
 East.

Oracle reference no: 4357
Version number: 3



5th March 2024





Areas outlined in red are those I've talked about in my submission

**Forrestdale Townsite East
Proposed minor amendment
as advertised**

19 July 2023

Proposal 1

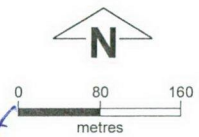
- Proposed Amendment:
-  Parks and recreation reservation
 -  Primary regional roads reservation
 -  Urban zone
 -  Urban deferred zone

From
D. F. James
(Lot 360.) 66 Leake st
Forrestdale 6112
5th March 2024

Oracle reference no: 4357
Version number: 3



Supporting my submission on MRS
Amendment 1408/57
Forrestdale Townsite East



The Urban Forest

Creating resilient, cooler and inviting green urban spaces in response to a changing climate. The Urban Forest will:



Reduce

- Ambient air temperature
- The 'urban heat island' effect
- Cooling energy consumption



Improve

- Visual amenity of streets



Create

- Liveable communities
- Safer walking environments



Clean

- Air by absorbing polluting gases



Provide

- Food and habitat for wildlife

From
D. F James
66 Leake st
9394 5000 Forroodale. 6112
armadale.wa.gov.au
5th March 24



Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-11 17:10:10

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

File 1:

No file uploaded

File 2:

No file uploaded

File 3:

No file uploaded

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-11 22:30:09

About you

1 What is your first name?

First name:
Wendy

2 What is your surname?

surname:
Bishop

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

5 What is your email address?

Email:
NandWBishop@bigpond.com

6 What is your address?

address:
859 Armadale Rd, Forrestdale, WA 6112

7 Contact phone number:

phone number:
93970675

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Future development of this area will increase traffic along Armadale Rd and thereby vehicle pollution, including noise pollution. It will necessitate the clearing of land of all vegetation (see current development projects in the area....Solaris, Mahala, Anstey Grove, Piara Waters, etc). Advising the developers to "retain trees where possible" is a get out of jail free card in which they can say they couldn't retain those trees. We see that over and over in these new projects.

We have Carnaby Cockatoos roosting in the area and have been for many years. Development of the area may discourage any roosting in the area because of the increased traffic, light pollution, cat predation, destruction of food sources and destruction of adequate roosting sites. Evening of 11 March I counted over 70 Carnaby Cockatoos roosting in the area.

Additional development of this area will have lasting effects on Forrestdale Lake. Wholesale clearing of the area will increase the ambient air temperature and increase water evaporation from the lake. The additional roads and homes will greatly reduce rainfall absorbtion.

Allowing developers to squeeze as many homes in as possible is also having effects on our children. The block size is often taken up completely by the home with no yard space for children to play in. No, recreation spaces do not and can not take the place of room to play within a parent's supervision. Parents can not always afford the time to take the children down to the park to play. Our society complains that children are spending too much time on devices.....but there is no area within the block for them to play outside.

The block size is also so small that there is no room to plant trees for shade. People are also very fearful that any tree they try to plant will have invasive roots and harm their foundations.

Armadale Rd is already a nightmare in the afternoons traveling eastbound because of the new traffic lights. Traffic backs up to nearly Anstey Rd around 3 pm. Adding MORE people will only make the problem worse.

Please consider that some areas need to be left underdeveloped. This is one of those areas.

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-11 23:00:21

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

As a ad wish to protect Forrestdale from going from rural to urban zoning... more chance of potentially losing even more of what's left of rural Forrestdale - what makes our small community unique with even more development. More development which is not wanted by the majority of the community and families

not wanting to be displaced from their homes.

Losing the remaining mature eucalyptus trees that serve as roosting and feeding areas for our endangered Black cockatoos that are already under threat from habitat loss in the area that need the mature old growth trees to survive..

The environmental report needs to be redone as it is not accurate... there are 13 mature trees on my property alone that I have personally witnessed and counted groups of 20 plus white tail and red tail Cockatoos regularly roosting in the evenings and feeding during the day.

There are also other wildlife present on property /and surroundings and in bushland that is not 'degraded ' such as Quenda, monitor goanna, bearded dragons, snakes such as dugite and tiger snake, boo books, owls ,kingfishers, honey eaters, butcher birds and other native bird species. This entire area is close proximity to Forrestdale Lake.

Thankyou for reading this far.More time is needed for public submission and adequate advertising of such plus greater environmental impact reports done and area to stay rural to protect native wildlife.

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 23:05:58

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

This area is small acreage properties with livestock , hobby farms , agistment centres (are in short and a wellness /mediation centre. People in this area are living here to enjoy the rural lifestyle with space.

Any potential development would effect the close proximity mature old growth trees that are habitat for multiple groups of Black cockatoo species regularly roosting and feeding here.

File 1:

inbound1562600405492349676.jpg was uploaded

File 2:

inbound5107830130567422951.jpg was uploaded

File 3:

inbound3134050236367696546.jpg was uploaded



Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-11 23:03:06

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Losing the remaining mature eucalyptus trees that serve as roosting and feeding areas for our endangered Black cockatoos that are already displaced and they need the mature old growth trees to survive.

File 1:

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File 2:

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File 3:

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Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 06:29:41

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

We have lived here for 37 years and our property is directly affected by this proposal We don't want to lose our property and don't want our lifestyle to change. We have Lot of the endangered Carnabies cockatoos frequenting our property and nesting in trees in the area.Keep Forrestdale the way it is.

File 1:

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File 2:

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File 3:

No file uploaded

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 08:38:24

About you

1 What is your first name?

First name:
Timothy

2 What is your surname?

surname:
Hoskin

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

5 What is your email address?

Email:
timmy8327@gmail.com

6 What is your address?

address:
18 Dumsday Drive forrestdale

7 Contact phone number:

phone number:
0403212630

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Pls keep our bushland and our communitie trees animals and beautiful nature in forrestdale I have lived hear 29 years and not single thought or care gone in destruction and destroying everything more house more people pls pls pls keep our bushland and it trees pls pls stop ☐☐

File 1:
No file uploaded

File 2:
No file uploaded

File 3:
No file uploaded

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 09:40:57

About you

1 What is your first name?

First name:
Ryan

2 What is your surname?

surname:
Foster

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

5 What is your email address?

Email:
rnfoster89@gmail.com

6 What is your address?

address:
22A Leake street Forrestdale 6112

7 Contact phone number:

phone number:
0423455632

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Significant amount of roosting black cockatoos, both Forrest red tail and white tail, (Baudin or Carnaby) frequent the area on a daily basis.

File 1:
No file uploaded

File 2:
No file uploaded

File 3:
No file uploaded

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 13:18:48

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

File 1:

No file uploaded

File 2:

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File 3:

No file uploaded

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 21:18:32

About you

1 What is your first name?

First name:

Name removed at the request of submitter

2 What is your surname?

surname:

3 What is your company name?

company name:

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

phone number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Will affect breeding of the local black Kaketoos. Can not afford to loose them. They take a long time to settle in an area.

File 1:

No file uploaded

File 2:

No file uploaded

File 3:

No file uploaded

Submitted to Metropolitan Region Scheme Minor Amendment 1408/57 - Forrestdale Townsite East
Submitted on 2024-03-12 21:23:02

About you

1 What is your first name?

First name:
YOHEI AND HIKARI

2 What is your surname?

surname:
OGAWA

3 What is your company name?

company name:
nil

4 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

5 What is your email address?

Email:
yohey.oga@gmail.com

6 What is your address?

address:
12 Broome Street Forrestdale WA 6112

7 Contact phone number:

phone number:
0456071590

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

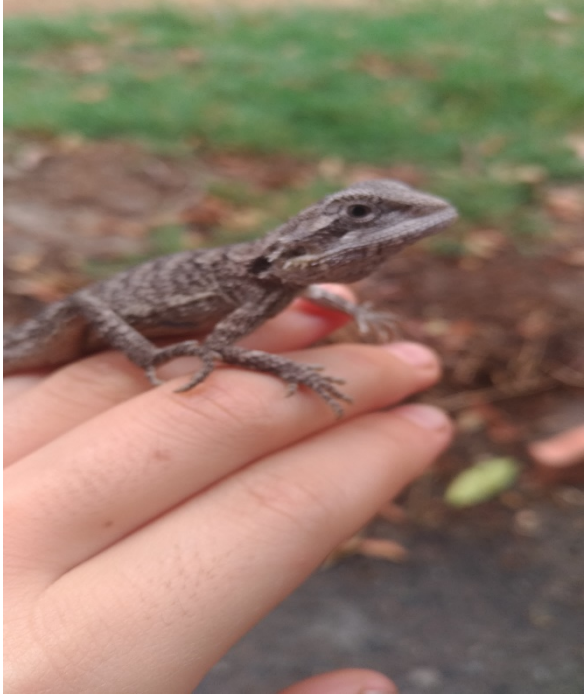
Hi,
Forrestdale has known for its amazing bushland.
there are lots of wild animal live in.
There is also a primary school, that is surrounded by nature. Many students choose the school from outside of school district because of its unique and fascinate location.
Our kids love Forrestdale and they are proud of themselves raised up in such a brilliant pleace.
We wish to protect this wonderful land to futre generations.

Lots of love
Yohei and Hikari

File 1: IMG_20240303_142157.jpg was uploaded

File 2: P_20240224_085358_vHDR_Auto.jpg was uploaded

File 3: FB_IMG_1701189024258.jpg was uploaded



*Our Reference: 3749Ltr25B
Enquiries: Daniel Martinovich*

14 March 2024

Anthony Muscara
Principal Planning Officer
Department of Planning, Lands and Heritage
140 William Street
PERTH, WA, 6000

Via email: RegionalPlanningSchemes@dplh.wa.gov.au

Dear Anthony

RE: SUBMISSION ON METROPOLITAN REGION SCHEME MINOR AMENDMENT 1408/57 – FORRESTDALE TOWNSITE EAST

CLE Town Planning + Design is the applicant for proposed minor amendment 1408/57 (the Amendment) to the Metropolitan Region Scheme (MRS) prepared and lodged on behalf of our Client, GM Property. We fully support the principle of the land being developed for urban purposes as proposed by the Amendment. We do, however, request a change to the zoning approach initiated by the Western Australian Planning Commission. Specifically, we request that the Western Australian Planning Commission, on the advice of the Department of Planning, Lands and Heritage (DPLH), rezone the 'Urban Deferred' portion of the amendment area direct to the 'Urban' zone.

Rezoning the eastern portion of the amendment area direct to the 'Urban' zone as part of this amendment process is warranted for the following reasons:

- It provides certainty of outcome that will enable more detailed planning for this land to progress in a coordinated manner and in conjunction with a future structure plan for the western 'Urban' portion.
- It will require the Water Corporation to respond accordingly by ensuring that the location of any future wastewater infrastructure at their Haynes Road site east of Tonkin Highway is cited and designed in a way so as to not constrain important urban land.
- Following the above point, it will unlock additional land for circa 150 homes in a location that is affordable, has access to existing transport, utility service and community infrastructure. Rezoning the eastern portion to 'Urban' will enable the land to be planned and delivered in association with the balance, creating efficiencies and economies of scale that assist to reduce development costs and make homes more affordable.
- Existing statutory buffers are in place east of Tonkin Highway to facilitate this outcome and our request does not shift the burden onto other land to a greater extent than what has already been planned for.

Background

CLE's request to initiate the Amendment in March 2023 proposed to rezone the amendment area (with the exception of the Park and Recreation Reserve on the western boundary) entirely to 'Urban'.

Notwithstanding, the DPLH recommended to the WAPC that the eastern 8.9 hectares of the amendment area be held in the 'Urban Deferred' zone pending confirmation of a potential odour buffer around the Water Corporation's future Water Resource Recovery Facility (WRRF) at lots 510 and 5060 Waterworks Road, Haynes. The WAPC resolved to initiate the Amendment on that basis however, has the option of rezoning the land to 'Urban' when it considers the outcomes of advertising and makes a recommendation to the Minister.

After the Amendment was initiated by the WAPC, GM Property and its consultant met with the Water Corporation to discuss the further studies needed to determine whether a future WRRF would be constructed on the site, and if so, whether it would generate the need for an offsite buffer west of Tonkin Highway. Based on the previous discussion with the Minister for Water, it was understood that this work would be prioritised and completed in a timely manner to coincide with the Amendment.

However, subsequent written advice from the Water Corporation on 19 September 2023 advised that the Water Corporation would not:

1. Complete the necessary studies within at least the next two years; or
2. Commit a timeframe to complete same in the future.

As the timeframe to undertake the studies is unknown and extends beyond the time to finalise the Amendment, the Water Corporation will not be in a position to confirm changes or requirement for the buffer within the timeframe needed to inform the rezoning process.

The Water Corporation did, however, acknowledge that it would "*accept that the WAPC will make a decision on acceptable uses in the buffer area that takes into consideration all the community's objectives*". This is reasonable given that the buffer has been in place for nearly 3 decades for a yet-to-be-constructed WRRF, and one that is still on hold pending scoping studies.

The statement from the Water Corporation does not object to the planning for the land progressing in the absence of further studies defining a necessary buffer around a potential future WRRF. Instead, it acknowledges that the WAPC can make a strategic decision on the land which the Water Corporation will accept. We interpret this response as an indirect acknowledgement that future planning for the WRRF can respond and adapt to an Urban zoning over the entire Amendment area. We expect this stems from the ability for any future WRRF to be designed and cited so as to not generate the need for a buffer over the subject land.

The reasons for our interpretation are discussed in detail below.

Planning for a WRRF at Lots 510 and 5060 Waterworks Road, Haynes

The ability to design around the amendment area

At approximately 30 hectares in area, the Water Corporation's (WC) Haynes Road site is large enough to accommodate future infrastructure without generating the need for a buffer over the amendment area. Specifically, if a 500-metre separation distance was maintained from the most eastern boundary of the amendment area, approximately 18 hectares of land would remain for the Water Corporation to design a future WRRF. This is illustrated on the attached plan (Attachment 2 – Portion of WRRF Site Generating Urban Deferred Zone).

Indicative concept layouts based on similar WC infrastructure prepared by our project engineer demonstrate that the 18 hectares of land outside a 500-metre buffer from the amendment area's eastern boundary is more than adequate to accommodate a future WRRF.

Potential to reduce the buffer

The notion of a 500 metre buffer was introduced in 1989 by the Health Department of Western Australia (Proposal for a Non Hazardous Industrial Liquid Wastes Treatment Plant at Forrestdale, August 1989) referencing the closest residential dwelling to the now de-commissioned Brookdale Liquid Waste Treatment Facility in their submission to the EPA.

The 500 metre buffer was reinforced in the 'Initial Planning' for a future (yet to be constructed) Westfield Recycling Water Treatment Plant (also referred to as Haynes Recycling Water Treatment Plant) in 1996, reflected in Water Corporation Plan DZ-30-2-2, and updated in 2022. We understand that the proposed buffer reflected a 1996 design for a treatment plant and the associated technology for the plant at the time.

The 500m buffer has been reflected in the City of Armadale's Local Planning Scheme No. 4 (via Special Control Area No. 1) and informed strategic land use planning. Improvements in odour management technology since 1996 as well as a potential change in the function of the site is highly likely to result in the 500-metre buffer being excessive. Notwithstanding, for the purpose of this submission we have assumed that a 500-metre will be required for any future facility and our comments reflect this base assumption.

Land capability of western portion of Haynes Road Site

We understand that land abutting the western boundary has been previously used in various forms to treat wastewater since the 1960s (Attachment 3 – Site Timeline). An extract from Hansard dated 24 June 2010 indicates that an environmental audit of the site would be publicly released once all site investigations required to address the data gaps identified by the EPA had been complete. We have been unable to source the final EPA audit report confirming that the data gaps have been addressed and that the site has received environmental clearance post the de-commissioning of the Brookdale Plant. It would be important to determine if the land abutting the western boundary is environmentally suitable for ground disturbance. If it was not, development of any future WRRF would in all probability seek to avoid this area assuming that suitable alternatives exist.

In that event, land capability may preclude development of a future WRRF within 500-metres of the amendment area, negating the need for a buffer.

Potential impact of odour buffers on land outside the amendment area

The intent and focus of this submission is to demonstrate that a future WRRF at the Haynes Road site can be designed and implemented so as to not generate the need for an odour buffer over the amendment area. This would involve constructing the WRRF over the southern or eastern portion of the Haynes Road site, necessitating the need to consider potential buffer implications for the land east of Tonkin Highway.

In this regard, the Armadale Redevelopment Scheme No. 2 (AR2) establishes a 500-metre odour buffer around the Haynes Road site. AR2 confirms that sensitive land uses are not permitted within the buffer. The land to north of Armadale Road and within 500-metres of the site is zoned 'Industrial' under the MRS, meaning that zoning controls will preclude sensitive land uses from occurring within the industrial area. The buffer east of Tonkin Highway and its relationship to the underlying zoning is depicted at Attachment 4 – 'Statutory Buffers – Haynes Road Facility.'

Constructing a future potential WRRF on the southern or eastern portion of the Haynes Road site as advocated in this submission, has already been planned for, with a buffer reflected in the statutory planning framework. Locating a WRRF as recommended will therefore not transfer the problem elsewhere and is a practical solution to unlocking valuable residential land within the amendment area.

Other factors

Water Corporation inaction and failure to plan accordingly

The Water Corporation's planning and design for the site has not proceeded within the timeframe necessary to inform strategic land use planning. Even with a rezoning proposal imminent, the Water Corporation has advised that planning for the Haynes Road site will not commence in the next 2 years with no indication provided on when it may commence thereafter.

Given the current housing crisis which is expected to continue into the foreseeable future, the urban land within the amendment area is strategically too important to preclude residential development in the short-term. If an option exists to free up this land for residential development, then it should be pursued.

Rezoning the land directly to 'Urban' as requested in this submission does not require a compromise or that the short-term supply of affordable housing be prioritised at the expense of the Water Corporation's infrastructure planning. Given the inherent design flexibility associated with the Haynes Road site as outlined above, the amendment area in its entirety is capable of being progressed for urban development without prejudicing the Water Corporation's future design and development of the Haynes Road site.

Inability to accommodate commercial 'non-sensitive' land uses within the buffer

The WAPC Amendment reports, states that consideration should be given to the potential for employment-generating land uses to occur within the buffer on the land 'Urban Deferred' portion of the amendment area. Whilst this may be a suitable approach to managing land use conflict in a general sense, from a practical sense and when considering the context and a characteristics of the land, development for commercial purposes is not a desirable nor feasible outcome.

The eastern 'Urban Deferred' portion of the amendment area is not suitable for commercial development due to:

- The potential for land use conflict – incorporating commercial uses into a relatively small scale and confined precinct has the potential to detract from residential amenity in terms of noise, traffic and intensity of land use.
- Incompatible interface – there is no intuitive or logical separation between a residential precinct and commercial precinct - such as higher order roads or natural features - in this location. The interface would therefore need to be carefully planned and managed however, this would inevitably lead to a loss of valuable developable land and more land being required in local reserves as an interface response that would need to be managed by the City.
- Access constraints – the land within the buffer has no direct access to / from Armadale Road and only limited exposure. Access and exposure to higher-order roads are two critical factors in the success of a commercial precinct and this location has neither. It is therefore unlikely to commercially succeed and is better suited for residential purposes as an extension of the adjoining residential area and Forrestdale Townsite.

- Opportunity cost – a commercial land use outcome is likely to fail for the reasons outlined above. Pursuing a futile outcome will mean that approximately 150 dwellings would not be delivered towards assisting to solve the current housing crisis.
- Economies of scale – there will be substantial time and cost savings by developing the land for residential purposes in association with the adjoining land to the west with no cost to government i.e. the land does not require the construction, extension or upgrade of significant utility or road infrastructure.
- Demand - there is already an abundance of employment land to the north and south that is better placed, more accessible and planned for industrial purposes, providing development opportunities for business and local employment opportunities for residents.

Summary

For the reasons outlined in this submission, rezoning the 'Urban Deferred' portion of the amendment area directly to 'Urban' will not prejudice the Water Corporation's future potential delivery of a WRRF at its Haynes Road site. The requisite statutory buffers have been planned for and exist east of Tonkin Highway to ensure that construction of a WRRF over the more eastern portion of the site does not have unintended consequences.

Zoning the land 'Urban' will provide a clear direction from the WAPC to the Water Corporation that infrastructure planning can and should respond to the needs of the State – which at present is the delivery of affordable, well-located housing with good access to services, amenities and infrastructure. The expansion of Forrestdale Townsite (east) presents a compelling opportunity to work towards achieving the States housing objectives, with the Water Corporation's preliminary advice to our Client indicating that they accept this as a potential outcome.

Thank you for the opportunity to make this submission. Should you have any queries, please don't hesitate to contact Daniel Martinovich on 9382 1233 or Daniel@cleplan.com.au.

Yours faithfully



DANIEL MARTINOVICH
PRINCIPAL PLANNER
CLE TOWN PLANNING + DESIGN

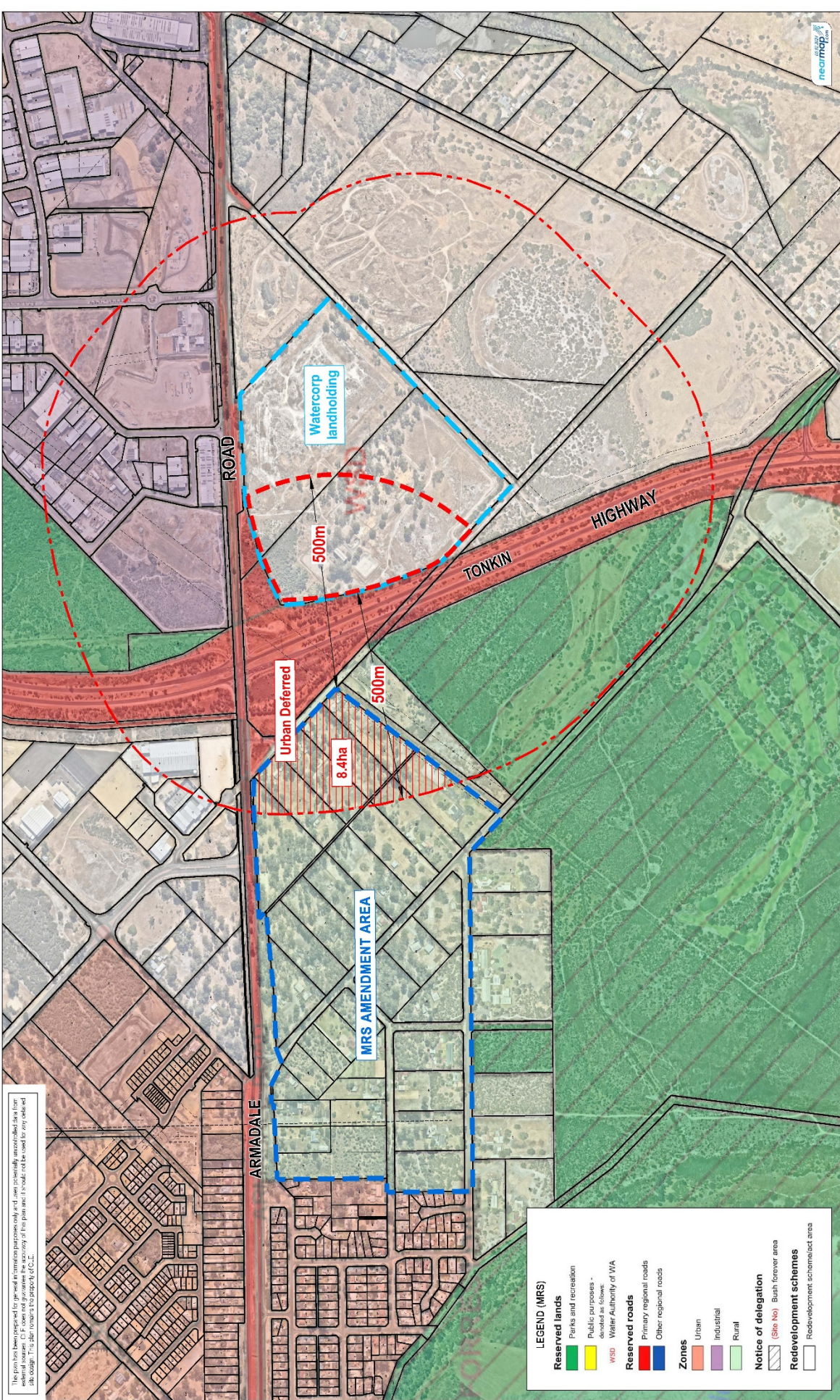
Encl: Attachment 1 – Portion of WRRF Site Generating Urban Deferred Zone
 Attachment 2 – Site Timeline
 Attachment 3 – Statutory Buffers – Haynes Road Facility

CC: Simon Munckton – GM Property

Attachment 1

Portion of WRRF Site Generating Urban Deferred Zone

The plan has been prepared for the use of information purposes only and does not constitute an offer of any financial product or service. It is intended to provide a general overview of the proposed scheme and is not intended to be used for any other purpose. The plan is the property of CLE Town Planning + Design Pty Ltd.



LEGEND (MRS)

Reserved lands

- Green: Parks and recreation
- Yellow: Public purposes - devoted as follows:
 - WSP: Water Authority of WA

Reserved roads

- Red: Primary regional roads
- Blue: Other regional roads

Zones

- Orange: Urban
- Purple: Industrial
- Light Green: Rural

Notice of delegation

- (Site No): Bush forever area

Redevelopment schemes

- White box: Redevelopment scheme/sect area

Source: Metropolitan Region Scheme Map, Sheet 24, Dated 9 August 2023

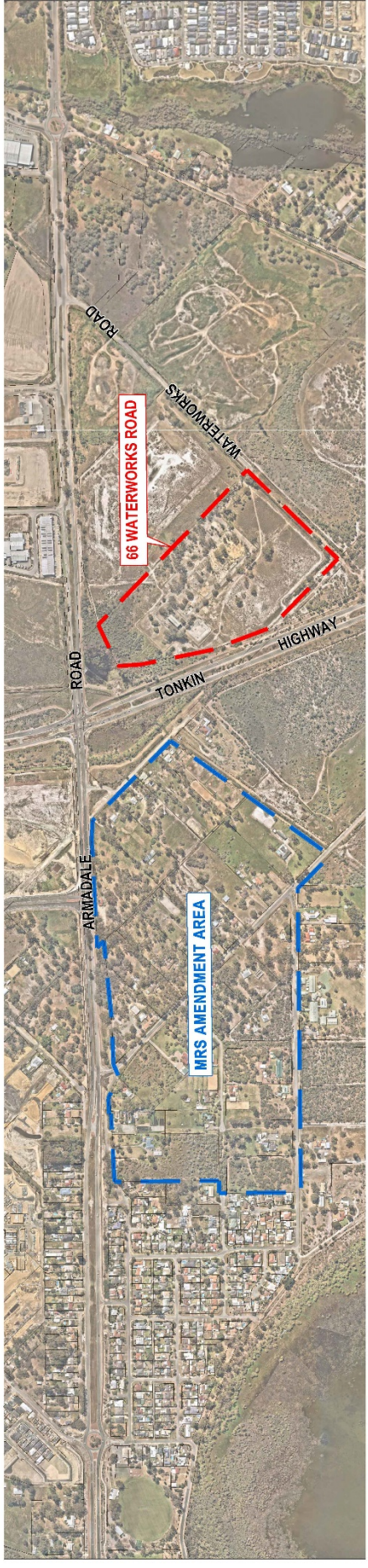
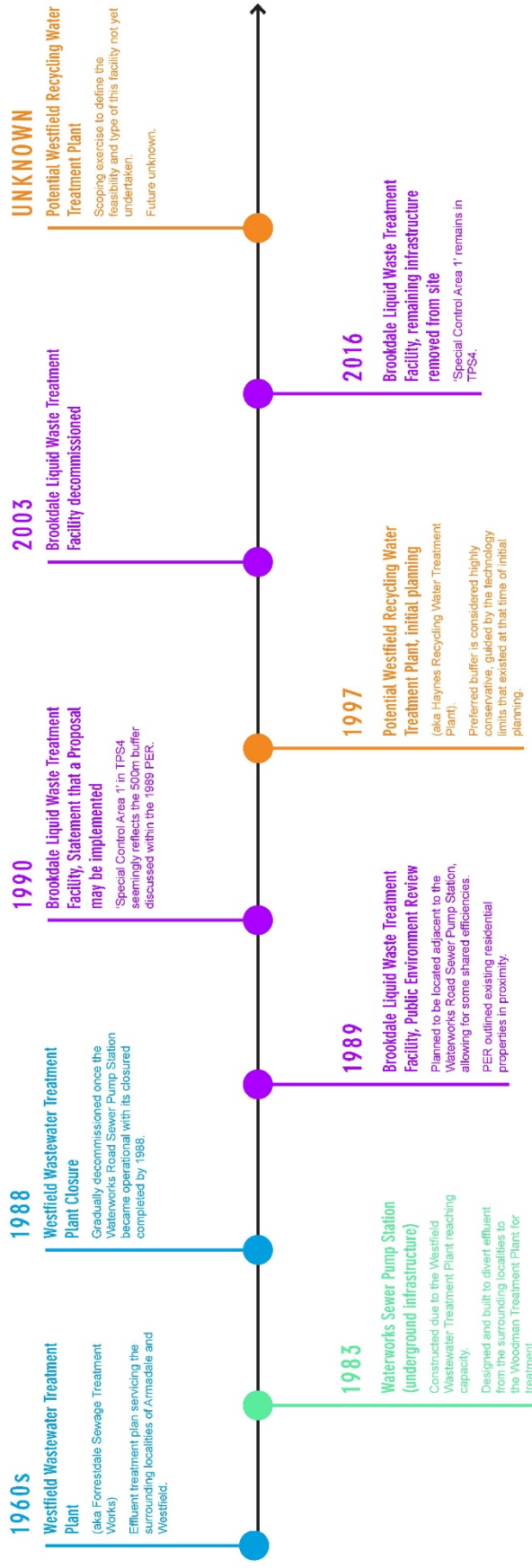


Attachment 2

Site Timeline

66 WATERWORKS ROAD, HAYNES - HISTORY OF FACILITIES

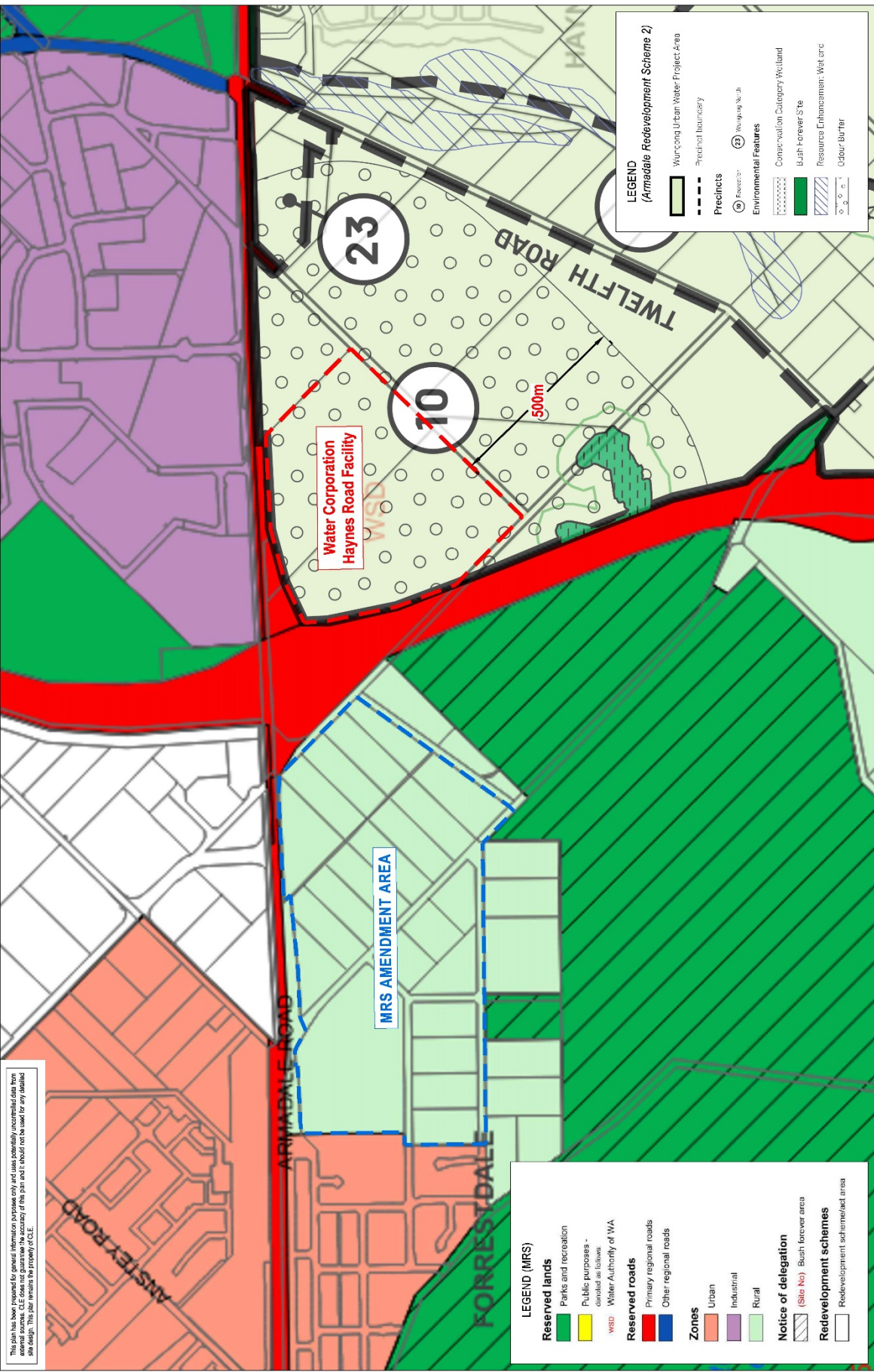
CLE Town Planning + Design



Attachment 3

Statutory Buffers – Haynes Road Facility

This plan has been prepared for general information purposes only and uses potentially uncorrelated data from several sources. CLE does not guarantee the accuracy of the plan and it should not be used for any detailed site design. This plan remains the property of CLE.



LEGEND (MRS)

Reserved lands

- Parks and recreation
- Public purposes - divided as follows:
 - WSD - Water Authority of WA

Reserved roads

- Primary regional roads
- Other regional roads

Zones

- Urban
- Industrial
- Rural

Notice of delegation

- (Site No) Bush forever area

Redevelopment schemes

- Redevelopment scheme/act area

LEGEND (Armadale Redevelopment Scheme 2)

- Wurroong Urban Water Project Area
- Archaeological sensitivity

Precincts

- Power 22
- Power 23

Environmental Features

- Conservation Category Wetland
- Bush Forever Site
- Resource Enhancement Wetland
- Odour Buffer

Source: Armadale Redevelopment Scheme 2, Dated 6 May 2022 & Metropolitan Region Schema Map, Sheet 24, Dated 9 August 2023





Department of
Education

Late Submission 019

Your Ref: RLS/1106
Our Ref: D24/0095125
Enquiries: Jack Sirett

Department of Planning, Lands and Heritage

Email: regionplanningschemes@dplh.wa.gov.au

Attention: Anthony Muscara
Principal Planning Officer

Dear Sir / Madam

Proposed Metropolitan Region Scheme Amendment 1408/57 – Forrestdale Townsite East – Rural to Urban, Urban Deferred, Parks and Recreation, and Primary Regional Road Reserve

Thank you for your email providing the Department of Education with the opportunity to provide for preliminary comments on the abovementioned Metropolitan Region Scheme (MRS) Amendment.

As per the Western Australian Planning Commission's Operational Policy 2.4 – Planning for School Sites (OP 2.4) a threshold of one public primary school site is required for every 1,500 dwellings. The Department notes the proposed MRS Amendment does not specify the anticipated dwelling yield. However, the accompanying report states approximately 40.73ha is designated for Urban and 8.9ha for Urban Deferred, of which it is anticipated that both zones would provide for residential land use. Depending on the potential residential density within the subject area at future structure plan stage, public primary school site(s) would be required to service the area in accordance with OP 2.4.

In view of the above, the Department has no in principle objections to the proposed amendment. The Department requests to be engaged at the earliest possible opportunity during the preparation of future structure plans or other localised planning instruments to ensure it can suitably forward plan for the public education needs of the area.

Should you have any questions in relation to the above, please do not hesitate to contact Jack Sirett, Senior Consultant – Land Planning, on (08) 9264 5374 or by email at jack.sirett@education.wa.edu.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Matt Turnbull'.

Matt Turnbull
Manager Land and Property

15 March 2024

Our Ref: PLU/PS4/17
Your Ref: 1408/57
Enquires: Meredith Kenny 9394 0627

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26 March 2024

The Secretary
Western Australian Planning Commission
140 William Street
PERTH WA 6000

Attention: Anthony Muscara

Dear Mr Muscara

SUBMISSION ON MRS MINOR AMENDMENT 1408/57 - FORRESTDALE TOWNSITE EAST

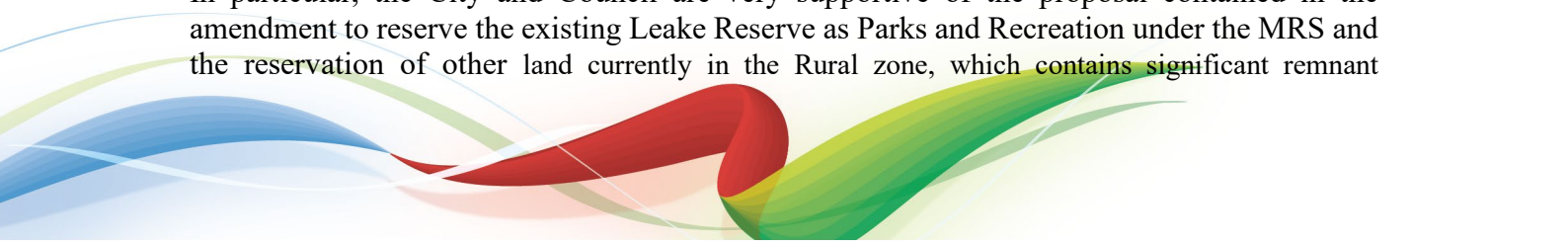
Thank you for referring the above amendment to the City for comment. At their meeting held on 26 March 2024 Council resolved as follows with regard to the proposal:

That Council:

1. *Advise the Western Australian Planning Commission that the City supports MRS Amendment 1408/57 to rezone the Forrestdale Townsite East Urban Precinct to Urban and Urban Deferred zones and the reservation of parts of the precinct for Parks and Recreation (Regional) and Primary Regional Road under the Metropolitan Region Scheme as shown on the MRS Amendment Map for Amendment 1408/57, subject to the following:*
 - a) *A separate Town Planning Scheme Amendment being prepared for the precinct to enable the insertion of requirements to be addressed at Structure Planning and Subdivision stages of development of the area;*
 - b) *The Urban Deferred zone being retained for the area affected by the buffer to the further Wastewater Treatment Plant until such time as Water Corporation have completed planning for the type and exact location of this facility and the final required buffer extent can be determined;*
 - c) *Corrections being made to the zoning plan for the MRS amendment as the plan incorrectly shows MRS zoning and reserves over the land on the eastern side of Tonkin Highway that is under the control of Development WA and is not zoned under the MRS.*

With regard to the matters contained in Council's resolution please find further detail in support of this decision on the attached table.

In particular, the City and Council are very supportive of the proposal contained in the amendment to reserve the existing Leake Reserve as Parks and Recreation under the MRS and the reservation of other land currently in the Rural zone, which contains significant remnant



vegetation, for Parks and Recreation under the MRS. The additional Parks and Recreation reserved land proposed will enable not just the retention of remnant Banksia Woodland (a Threatened Ecological Community) but also many other mature trees and some Priority 3 classified Flora being *Jacksonia gracillima*. The extension of the Parks and Recreation reservation under the MRS will also assist in the potential for establishment of an ecological corridor from the wetland in Leake Reserve down to Forrestdale Lake (a designated Ramsar wetland).

Council's resolution of 26 March 2024 also contained advice to the applicant (CLE Planning) with regard to future planning stages for the Forrestdale Townsite East future urban precinct as follows:

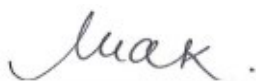
3. *Advise the proponent to continue to liaise with the City in preparing applications and technical studies in support of a future amendment to TPS No.4 and future structure plan including (but not necessarily limited to):*
 - a) *Noise impact assessment related to Armadale Road and Tonkin Highway;*
 - b) *Engineering Servicing Report;*
 - c) *A Local Water Management Strategy;*
 - d) *Environmental Impact Assessment including Flora and Fauna assessment and protection strategies where required;*
 - e) *Retail Impact Assessment with regard to the proposed Local Centre;*
 - f) *The buffer to the future Wastewater Treatment Facility that affects the precinct;*
 - g) *Traffic Impact Assessment;*
 - h) *Bushfire Hazard Assessment;*
 - i) *Aboriginal Heritage Survey;*
 - j) *A Sustainability Strategy that addresses retention of existing trees wherever possible, climate change, tree canopy, minimization of creation of urban heat islands and urban greening;*
 - k) *Rationalisation of some of the smaller POS areas shown on the Concept Plan into larger POS areas. This is relevant for future maintenance considerations;*
 - l) *Further information on the potential use and treatment of the road widening for Forrest Rd required by the Water Corporation for its infrastructure; and*
 - m) *Advice on the Water Corporation's drainage corridor and interface with the future Urban area – removal of fencing between Drain and the proposed Road shown on the Concept Plan and planting of trees and shrubs within the proposed road reserve verge abutting the drain.*

The above advice of Council has been provided directly to the applicant.

Council also requests permission to deliver a deputation to the WAPC Planning Committee detailing the City's decision on MRS Amendment 1408/57 when the amendment goes to a meeting of the WAPC for determination.

If you require further information with regard to this matter please contact me on 9394 0627.

Yours faithfully



MEREDITH KENNY
COORDINATOR STRATEGIC PLANNING

Enc/...

CITY OF ARMADALE SUBMISSION ON MRS MINOR AMENDMENT 1408/57 – FORRESTDALE TOWNSITE EAST

COUNCIL RESOLUTION PART	INFORMATION IN SUPPORT OF COUNCIL RESOLUTION
<p><i>A separate Town Planning Scheme Amendment being prepared for the precinct to enable the insertion of requirements to be addressed at Structure Planning and Subdivision stages of development of the area.</i></p>	<p>Concurrent amendment of the City’s Planning Scheme under Section 126(3) of the <i>Planning and Development Act 2005</i> is not acceptable for the following reasons:</p> <ul style="list-style-type: none"> • The need to include the precinct in a Development Area on Special Control Area Map No. 3 of TPS No. 4; and • The need for appropriate requirements to be included in Schedule 8 Development (Structure Plan) Areas of TPS No. 4 to be addressed during the preparation of the Structure Plan for the precinct including: <ul style="list-style-type: none"> a) Noise impact assessment related to Armadale Road and Tonkin Highway; b) Servicing Report; c) A District Water Management Strategy; d) Environmental Impact Assessment including Flora and Fauna assessment and protection strategies where required; e) Retail Impact Assessment with regard to the proposed Local Centre; f) The buffer to the future Wastewater Treatment Facility that affects the precinct; g) Traffic Impact Assessment; h) Aboriginal Heritage Survey; and i) Bushfire Hazard Assessment. <p>Specific development considerations for later stages, and key recommendations for future development, which will need to be addressed in future planning stages are addressed below.</p> <p>Drainage and Groundwater</p> <p>The area is characterised by wetland features, high groundwater table and seasonal inundation. A variety of previous studies and strategies have been prepared in the past that include the amendment area including the:</p> <ul style="list-style-type: none"> • Southern River / Forrestdale / Brookdale / Wungong District Structure Plan (DSP) Urban Water Management Strategy (JDA 2002); • Southern River Integrated Land and Water Management Plan (Department of Water 2009); and • Forrestdale Main Drain – Arterial Drainage Scheme (Water Corporation 2010).

COUNCIL RESOLUTION PART

INFORMATION IN SUPPORT OF COUNCIL RESOLUTION

However, the analysis carried out in the above studies for the area covered by this MRS amendment was undertaken in the context of rural land use rather than the urban residential development envisioned by this MRS amendment. In addition, the above strategies are now quite out of date. As a result, the proponent's District Water Management Strategy (DWMS), and future subsequent local water management strategies (at structure planning stage) and urban water management plans (at subdivision stage) will review findings, update modelling, and apply current policy/best practice. With changes to drainage infrastructure, filling of the land and the runoff from the significant increase in impermeable hard surfaces throughout the area as part of the urban development must not be allowed to cause an increase in flooding of properties outside the amendment area.

Interface of the Water Corporation's Main Drain and Western Power easements and future urban area.

The 20 metre wide Main Drain (Lot 501 Forrest Road) abuts the boundary of the future urban area the subject of this MRS amendment. A 10-meter-wide easement runs parallel to the Drain reserve within the MRS amendment area and a 30-meter-wide easement abuts the south side of the Water Corporation's land. These easements on either side of the main drain are to the benefit of Western Power (formerly SECWA) and contain high voltage power infrastructure. It will be necessary for the easement to be further evaluated as part of the Structure Plan preparation to ensure it is not impacted in future by flooding from the Water Corporation's Main Drain. The Concept plan provided by the applicant shows that it is proposed to construct a road along almost all of the boundary of the Main Drain (over the Western Power easement) as well as some small portions of Public Open Space and a possible site for a future sewerage pump station.

Currently, there is rural-style fencing between the Main Drain (Lot 501) and privately owned properties. It is likely if fencing is proposed to be replaced along the drain corridor when urban development proceeds that the fencing would be 1.8m high cyclone mesh fencing similar to Water Corporation drains existing in Armadale, Kelmscott, Camillo, Seville Grove and other suburbs within the City so it is important that the City highlight its desire for an option that will achieve a better outcome in terms of visual amenity than other existing drains.

COUNCIL RESOLUTION PART	INFORMATION IN SUPPORT OF COUNCIL RESOLUTION
	<p>The future construction of a road between the Main Drain and future residential lots, along with some small areas of POS, provides an opportunity for the fencing along the drain to be removed and for the amenity of the future streetscape to be addressed through planting of trees and shrubs along the side of the future road that will abut the Main Drain. However, the existence of the Western Power easement along this alignment may prevent the establishment of any planting. The applicant needs to investigate these matters during preparation of the Structure Plan to clearly ascertain the likely outcome in terms of visual amenity.</p> <p>In addition, Water Corporation drains often flood adjoining rural land and these impacts need to be considered.</p> <p>Aboriginal Heritage There are a number of Aboriginal Heritage sites identified near to the MRS amendment area within the Wungong Urban Water Master Plan Area (a few hundred meters east of the amendment area) and also around Forrestdale Lake (south of the Amendment area). There aren't any Aboriginal Heritage sites currently identified within the amendment area but, given the existence of a wetland within the amendment area and the existence of other heritage sites adjacent to the amendment area it is considered that an Aboriginal Heritage Survey should be completed as part of the Local Scheme Amendment and Structure Plan processes.</p>
<p><i>The Urban Deferred zone being retained for the area affected by the buffer to the further Wastewater Treatment Plant until such time as Water Corporation have completed planning for the type and exact location of this facility and the final required buffer extent can be determined</i></p>	<p>The Water Corporation is investigating a potential Waste Water Treatment Plant (WWTP) to be located east of Tonkin Highway and there could be the need for a 500 m buffer. Therefore, WAPC proposes that the land within the buffer area is to be zoned Urban Deferred pending further consideration by the Water Corporation and compatible land uses prior to its transfer to the Urban zone.</p> <p>Any reconsideration of the extent and location of the buffer needs to consider:</p> <ul style="list-style-type: none"> ● Future residential development within the Forrestdale Townsite East Urban Precinct; and ● existing, proposed and approved land uses to the south, north and east of the future wastewater facility including: <ul style="list-style-type: none"> ➢ Forrestdale Business Park particularly food businesses and other businesses that may be sensitive to the type of odours that may emanate from the future WWTP such as gyms and medical centres that are extant or can be developed within parts of the Business Park; ➢ Land committed for the Armadale Regional Sporting Facility which would include clubrooms and canteens, food kiosks; and

COUNCIL RESOLUTION PART	INFORMATION IN SUPPORT OF COUNCIL RESOLUTION
	<p>➤ WAPC landholdings proposed for future residential development.</p> <p>The City is aware that the applicant intends to include in their submission that the buffer be modified or relocated in order to allow the immediate inclusion of the Urban Deferred are in the Urban zone. In support of this proposal, the Applicant's Engineering Servicing Report contains plans showing possible outcomes with regard to the location of the future WWTP within the Water Corporation's land and alternative buffer locations that could be applied. The City does not consider the applicants proposals with regard to the size and location of the future WWTP should not be given serious consideration for the following reasons:</p> <ul style="list-style-type: none"> • The Water Corporation have not carried out any detailed site or facility type planning to date; • It is unknown where the facility will eventually be located within the site; • Detailed investigation as to the final extent of the buffer that will be required has not been undertaken; will be; • The alternative buffer location shown on the plan in the Engineering Servicing report starts from the centre of the hypothetical future facility and not the outside of the facility or the boundaries of the Water Corporation site: and • In their determination of the proposed MRS amendment the EPA stated as follows: <p><i>Future lifting of the proposed 'Urban Deferred' zoned area should be dependent on the outcomes of further planning and environmental investigations considering potential impacts to sensitive land uses.</i></p>
<p><i>Corrections being made to the zoning plan for the MRS amendment as the plan incorrectly shows MRS zoning and reserves over the land on the eastern side of Tonkin Highway that is under the control of Development WA and is not zoned under the MRS</i></p>	<p>The MRS amendment plans incorrectly portray the future land uses that will occur in Wungong and as such could result in incorrectly informed changes to the Water Corporation buffer that could adversely impact the planned future land uses in Wungong including land owned by WAPC and intended for residential development and land committed for the Armadale Regional Sporting Facility.</p> <p>In addition, Section 58(2) of the <i>Metropolitan Redevelopment Act 2011</i> states as follows: <i>A planning scheme, or an amendment to a planning scheme, made after a scheme start day, insofar as it purports to apply to land in a redevelopment area, has no effect while the redevelopment scheme has effect.</i></p>

COUNCIL RESOLUTION PART	INFORMATION IN SUPPORT OF COUNCIL RESOLUTION
	<p>Under the <i>Metropolitan Redevelopment Act 2011a</i> “planning scheme” is defined as follows:</p> <p><i>planning scheme</i> means any of the following —</p> <ul style="list-style-type: none">(a) a local planning scheme;(b) a region planning scheme as defined in the <i>PAD Act</i> section 4(1);(c) an improvement scheme. <p>Accordingly, the MRS amendment map should not show MRS zones and reserves in the area of the Development WA Redevelopment Area on the eastern side of the Tonkin Highway.</p>