Number & Date	Submitter	Nature of Submission	Comment	Recommendation
·				1
1 (19-02-14)	Private Landowner	Object. This scheme will destroy the tranquil rural setting that we currently enjoy.	The structure plan provides a transition in intensity of development through the provision of rural-residential lots, larger residential lots and public open space around the periphery of the development. Traffic increases will remain within the limits of the current road functions.	Note Submission
2 (22-02-14)	Private Landowner	Tramway Road: The Crown land proposed for the Tramway Road extension is designated Parks and Recreation. In a letter from the WAPC regarding the subdivision of my land it states that the property is crown land and is designated Parks and Recreation so under the Waggrakine Scheme it is not to be used for access to my property. Given that, it should not be used for an estimated 3,000 vehicles a day going over it. Also kangaroos live on the land and there is quite a lot of native trees growing on the block which the proposed road will require their removal. According to the Scheme native trees and wildlife should be kept, especially on Crown land designated Parks and Recreation. Given that the proposed scheme relies on a massive 3:1 vehicle use on Tramway Road I consider the proposed use completely wrong and bad planning, especially when Sutcliffe Road is being ignored in the current proposal. Also there are 3 roads to the southern boundary that will handle all the required traffic, one of those roads Sutcliffe Road is not being used at all only to supply 2 subdivision blocks.	Access through a Parks and Recreation Reserve is not permitted unless the relevant portion of the reserve is reclassified for road reserve purposes, which is subject to a formal application process. During this formal process and the subdivisional process the City has the opportunity to request conditions on the application that would include the protection of remnant vegetation where feasible. The design of the road extension itself could also incorporate the retention of significant remnant vegetation. The proposed extension of Tramway Road is proposed through the middle of the reserve, and so would be setback from the adjoining property boundaries. A Transport Report has been provided by the applicant and provides an analysis of daily traffic based on a trip rate of 9 daily vehicle trips per dwelling which is in line with Road Traffic Authority and WAPC Guidelines. The development results in the generation of up to 16,200 vehicle movements per day with 11,300 vehicles per day expected to access the external road network. Over 7,000 of these movements are expected on Tramway Road.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
2 continued		The traffic that this subdivision will create going south to Geraldton though Sutcliffe Road, Arnold Road and Hackett Road could be as high as 11,000 vehicles a day put that into the system at the Sunset roundabout on the North West Coastal Highway and you have a major problem particularly at peak work and school times. There is plenty of land on the southern side of Geraldton that could be used for intensive subdivision that would work with the existing roads and not create major road problems that the two bridges create.	The Transport Report states that Tramway Road will function as a district distributor road and 'Liveable Neighbourhoods' states that these roads have the capacity to carry between 7,000 and 20,000 vehicles per day. Therefore the forecasted volume along Tramway Road can be accommodated. The proposed road network of Moresby Heights has been subject to detailed traffic analysis to ensure it represents a balanced and functional approach. Concentration of all access to existing roads to the south of the development area is not consistent with the principles of 'Liveable Neighbourhoods', which seeks to maximise connectivity and spread traffic load. While traffic increases will remain within the limits of the current road functions, the Transport Report does also state that a number of treatments at intersections, traffic management and upgrades will be required within the external road network to ensure the increased traffic amounts will be appropriately accommodated.	
		Sewerage: There has been no set location for the sewerage plants to be placed only possible suggestions. Specific locations need to be clear so that comments may be made on the problem of offensive smell that comes from ponds and processing sewerage. Sewerage for such a concentrated subdivision should be connected to the Geraldton Sewerage deep drain scheme. If doing so is not viable, then the scheme is not properly planned and funded and relies on the surrounding properties to deal with the problems.	The proposal does not propose a conventional sewerage plant with settlement ponds and associated odours. The technology being proposed allows waste water to be treated in small, enclosed facilities with (it is understood) no odour impacts. This is subject to strict regulatory control and licensing to ensure no adverse impacts on the environment, groundwater, health and amenity. These options are still being investigated and if appropriate alternative means of waste water treatment cannot be met then conventional deep sewerage would be required.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
2 continued		The Waggrakine scheme works well and so does the Moresby scheme in the Webber Road areas, also the Woorree area is a result of the Utakarra subdivision that needed sewerage put in over the last few months because of too small blocks that could not cope properly with their sewerage. Any subdivision done in this area must work on the same system as the new Waggrakine Scheme without using Crown Land to service it. It is highly likely that any treatment ponds and plants will be established on the western side of the proposed subdivision to keep profits up and the smell of sewerage treatment will be taken away from the people that create it and make other people put up with it. Sewerage has to be back to the Geraldton system or resolved by blocks big enough to handle the problem safely and effectively that includes for the shopping centre and school. Shopping Centre: I object to the idea that a small shopping centre can service 54,000 people when Geraldton Shopping Centres struggle at times with parking and are servicing less than 54,000 people now.	An error was made on page 17 of Part 2 of the structure plan report which incorrectly states that the development could cater for up to 54,963 people. The figure should have been 4,963 people. It is considered that this population is an appropriate catchment for the proposed Neighbourhood Centre. On page 13 the incorrect floor area of a Neighbourhood Centre is given as 6,500m² where the figure should be 6,000m². The structure plan including Map 1 also incorrectly refers to the Neighbourhood Centre as a Local Centre on a number of occasions.	Note Submission Modify page 17 of the Local Structure Plan to amend the figure of 54,963 to 4,963. Modify page 13 of the Local Structure Plan to amend the figure from 6,500m² to 6,000m².

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
continued		Planning: I do not believe there has been good planning in relation to the size of the subdivision along with the number of people that will be living there. The types of facilities required for the number of people has not been accounted for. Football and soccer fields, tennis courts, etc. these facilities will eventually have to be provided and there will be a demand for them. It should be the developers responsibility to supply these services and facilities. If the planners want higher numbers of people with less drainage and transport problems then they should be looking at high rise apartments closer to the town centre where walking would be a better way to deal with the problems along with reasonable home costs where there are already existing facilities. Or planners should be using property on the southern side of the Chapman River and eastern sides of Geraldton where roads and sewerage will be less of a problem and more economical to develop. The escarpment is meant to be a tourist area, the subdivision will most certainly be visible from there and tourists will wonder about all the people jammed into such a small area.	The plan makes provision for 14ha of district recreational facilities on-site with the land for this being provided by the developer free of cost. These facilities have potential to service a larger population than is proposed by the structure plan, providing a broader community benefit. The Transport Report and Preliminary Engineering Services Report (including the Local Water Management Strategy) provided with the structure plan demonstrate that the increase in vehicular traffic and increased runoff can be effectively dealt with and mitigated. The main focus of the Visual Impact Assessment is to ensure that the development does not negatively impact the visual prominence of the Moresby Ranges. Residential developments are already visible from the Moresby Ranges.	Modify the Local Structure Plan and Map 1 to consistently refer to the commercial area as a 'Neighbourhood Centre'. Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
3 (25-02-14) and (27-02-14)	Dept. of Aboriginal Affairs	There are no known sites registered with the Department within the work area. The Plan area is not within the boundary of any sites currently mapped on the Register of Aboriginal Sites.		Note Submission
4 (25-02-14)	Private Landowner	Support.		Note Submission
5 (04-03-14)	Private Landowner	Support. Extend the road reserve through to new section of Arnold Road to link with Sutcliffe and David Roads. This "east-west" link will assist with traffic flow from the southern section of the new area to the City and North West Coastal Highway. This section of Road does appear on the landscape hierarchy plan, yet not on any of the other plans.	The extension of Sutcliffe Road to link across the site was not pursued in order to minimise crossing the central vegetated spine which provides a green link to the Moresby Ranges. David Road was not extended into the site as the alignment affected the existing wetlands in the south west of the site. The proposed road network of Moresby Heights has been subject to detailed traffic analysis to ensure it represents a balanced and functional approach. Figure 16 - Landscape Hierarchy can be updated to reflect the road alignments within the Local Structure Plan.	Note Submission Modify Figure 16 – Landscape Hierarchy to remove the extension of David Road.
6 (05-03-14)	Private Landowner	Support (with objections). It is a well thought out and environmentally sensitive plan. We like the open space, use of recycled water and protecting remnant vegetation.		Note Submission
		Our main concerns are light pollution – does there have to be street lights?	The City's Land Development Specifications require that certain standards of lighting be provided within new developments in accord with the Australian Standards.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
6 continued		Our children walk to the bus and increased traffic is a concern, as it would go past our property (Tramway). It would be great if the organisation could commit to incorporation and extending bike paths to go to Waggrakine School or to Chapman Valley Road.	The vehicles numbers along Tramway Road are expected to increase and the Road is proposed to function as a district distributor road. The structure plan requires that upgrades to the external road network are required and will be subject to further investigation prior to subdivision. This will include investigating the need to extend pedestrian and bike paths outside of the structure plan area.	Note Submission
		We would like to see a commitment to increasing biodiversity by planting local indigenous species.	The structure plan has committed to biodiversity by specifically requiring that 3% of the rural-residential lots are re-vegetated with indigenous plant communities identified in the Geraldton Regional Flora and Vegetation Survey. Conservation lots are required to rehabilitate degraded areas with local provenance seedlings and public open space management plans require revegetation species that incorporate native plant species with local provenance.	Note submission.
		Geraldton needs another high school as soon as possible, not another primary school.	Agreed, however the construction timing of public schools rests with the State Government and the Department of Education. In this particular instance the Department dvised on the requirement for a primary school but no high school in this location.	Note Submission
		Finally, the tourism area sounded good. I imagined a lookout and picnic/BBQ facilities. When I read the hotel/accommodation I was not so impressed. I certainly don't want an increase in drink drivers in the area (as there are already enough hoons).	The tourism sites with the structure plan area provide a real and immediate opportunity to realise well located facilities providing for a range of accommodation from eco-chalets to a possible café/restaurant or even small tavern. The issue of drink driving is a police matter.	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
r				T
7	Private Landowner	Support (with objection).	With regard to the road access to the eastern	Uphold Submission
(07-03-14)			most Tourism site, the City does agree that road	(in part)
		I support the Structure Plan, however there is one	access from the east is a far more beneficial	
		glaring part of the proposal which I strongly object to	outcome, both economically and visually.	Modify the Local
		and goes against the intent of the Moresby Range	However, at present land ownership is a	Structure Plan by
		Management Document 2010, that being the	significant issue that may hinder road access	replacing the
		construction of a road up the face of the Moresby	from being accomplished.	wording in Section
		Range to provide access to a tourist facility on the top		5.6 of Part 1 with
		of the range.	In this situation it is appropriate for the City to	the following:
			strongly promote road access to the site from the	
		The plan identifies two tourist areas:	east, but to also allow for alternative access	"Whilst it is
			arrangements to occur if landownership issues	preferable that
		Site 1 – At the northern end of the development area.	prevent it.	access to the
		This site has natural access form the developed area		easternmost tourism
		with a gradual rise in land form. This site is currently	Alternative access to the tourist site from the	site be from the
		farmed and is easily accessed without impacting on	west would only be supported if all options for	east, if this is not
		the natural ecology of the range or its natural	eastern access were exhausted and only if	achievable then
		landform, therefore there is no objection to this site.	backed up by comprehensive assessment to	prior to lodgement
			demonstrate that the access does not have	of subdivision
		Site 2 – This site is located on the top of the range	excessive visual impact.	application to create
		and therefore falls more directly into the boundaries of		the easternmost
		the Moresby Range Park slopes and mesa tops		Tourist site, a Visual
		definition. These boundaries are defined in the		Landscape
		Management document and were extensively covered		Assessment and
		by community consultation (fig 01.2-6 and fig 01.8)		Management Plan
		where access by vehicle to the range was limited as		shall be prepared
		was any development on the sides of the Range.		demonstrating to the
		Vehicle access up the face of the Range would		satisfaction of the
		blatantly go against the community's wishes noted in		relevant authority
		the Management Plan under the section "How		how access to the
		important is it to stop erosion?" There is no way that		site from the west is
		water control can be effective from a road surface in		to be provided in a
		the location proposed when the dynamics of volume		manner which
		and velocity are applied to a major rainfall event. The		achieves visual
		massive erosion created in the Moresby's with the		integration and
		rainfall event of February 2008, which caused		appropriate siting."
		significant damage to Chapman Valley Road and		
		flooded into the suburb of Moresby, is proof of this.		

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
7 continued		I support the Tourist precinct; however access must be from the eastern side of the site. There is already a surveyed road servicing the communications towers located on the top of the ranges and creates possible access to the eastern side of the tourist site and has minimal visual (figure 0.15 visual landscape assessment also fig 11.5 & 11.6) and erosion problems. With consultation with other landowners a far more sensible outcome could be arrived at in regards to the access to the proposed site. The Moresby Range Management Document was specifically created to provide a planning framework and to maintain the integrity of the Moresby Ranges. Any road access up the fact of the Ranges will be strongly opposed as it destroys not only the natural landscape but goes against the integrity and intent of the Moresby Range Management Plan. Especially when there is a more sensible alternative.		
8 (04-03-14)	Private Landowner	Object. I cannot see how Arnold Road can have 1,000 cars a day on it with the bend between Arnold and Bore Road. Sutcliffe should be the main access as it is a straight run to Chapman Valley Road as is Hackett Road.	Arnold Road is estimated to attract approximately 2,190 additional vehicles per day, which represents less than 20% of the volume projected to access the external road network from the site, at full development. The projected increase in traffic along this road will remain within the threshold for a local road and while it will experience additional traffic, its status and applicable standards will not change. The connection of Sutcliffe Road into the development was not considered appropriate as it would result in an additional break across the linear open space connecting up to the Moresby Range while servicing a relatively smaller area.	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
9 (08-03-14)	Private Landowner	I do not know enough about the pros and cons to support or reject the proposal, but I do wonder where the eventual buyers are coming from, and what effect it will have on the property market in Waggrakine.	The City's Strategic Community Plan has a vision to sustain a population of 80,000 to 100,000 people. The timing of the release of the land will be a decision made in the economic climate at that time. The land may well remain "as is" for some time. Forward planning for the site should be progressed to enable the timely release of land as demand warrants.	Note Submission
10 (12-03-14)	Dept. of Agriculture and Food WA	The Department of Agriculture and Food (DAFWA) has no objection to the Plan as the area has previously been identified as a Development Zone by the City. DAFWA supports the recommendation of adherence to stocking rate guidelines.	as demand warrants.	Note Submission
11 (12-03-14)	Shire of Chapman Valley	It is noted that the Local Structure Plan proposes lots in an area identified by Figure 04.3 of the Moresby Range Management Plan (2010) as visually sensitive. The Local Structure Plan makes argument for maximising the lot yield in areas that are either not visible, or only visible to a minor degree from Geraldton, and this is an argument that may be considered to have merit. However, the Local Structure Plan also proposes encroachment into land identified by the Moresby Range Management Plan as being of high visibility and forming part of the backdrop to Geraldton.	The key concern is potential visual impact of development on the lower slopes of the Range. The structure plan has been informed by a comprehensive and detailed analysis of landscape and visual impact which provided the basis to refine the Moresby Management Plan recommendations. The most important aspect of the district landscape character is the integrity of the skyline defined by the Moresby Range. The site constitutes a small portion of the greater landscape and panorama of the Moresby Range and is a minor component of a broader extensive view.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
11 continued		The Moresby Range Management Plan identified a 'barrier road' that was based on an alignment above which community consultation had established further development should not encroach. It is recognised that the scale of the Moresby Range Management Plan should allow for variation to be made where justified but it is noted that where the Local Structure Plan seeks to subdivide and develop higher up on the slope than recommended by the Management Plan it also proposes to do so at a density much higher than recommended for this area. Consideration of subdivision further up the Moresby Range slope at a higher density than recommended by the Management Plan will set a precedent for subsequent development along the backdrop to Geraldton including the land south of Chapman Valley Road and the western footslopes of Mount Fairfax.	The site is not prominent in the broader landscape and when developed (in accordance with the visual management measures as recommended by the structure plan and enforceable through the Detailed Area Plan requirements) will be integrated within the contextual landscape and will not be an obtrusive element.	
		Proposed Tourism Sites: The Local Structure Plan proposes 2 tourism sites on the Moresby Range in locations of high visibility. The Visual Impact Assessment Report included as Appendix 3 to the Local Structure Plan document makes reference to design guidelines being required to limit visual impact, but confirms that built form and associated access and infrastructure will be visible upon the Range. Figure 23 of the Visibility Impact Assessment report identifies the proposed northern 'Tourist' site as located in the 'area of greatest visibility risk' and does not even provide an assessment for the location upon which the eastern 'Tourist' site is proposed.	There are two particularly special viewing locations within the site that allow for panoramic views of the City. The north eastern tourism site is tucked into the elbow of the scarp and the eastern site is located on the top of the Moresby Range with development proposed to be setback at least 30m from the edge of the scarp. The location of the tourism sites with the structure plan area provide a real and immediate opportunity to realise well located facilities providing for a range of accommodation. The structure plan provides adequate controls to guard against adverse visual impact, as is recommended by the structure plan, and enforceable through the Detailed Area Plan requirements.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
11 continued		The Moresby Range Management Plan gave consideration for the need to provide low key recreation and tourism opportunities that utilise the Range's natural assts. After careful consideration, the Plan identified a site for Central Facility in the City of Greater Geraldton on the south side of Chapman Valley Road as the focus for this activity. The Facility identified by the Moresby Range Management Plan can be accessed by an existing access alignment that is not visible from Geraldton. This Facility was intended to locate varied activities in one location thus keeping intensive uses contained and serve as a	It should be noted that one of the priority activities that is advocated by the Moresby Range Management Plan is providing access for people and it is considered that the inclusion of these tourism facilitates assists in implementing the Management Plan objectives to provide access to the range for visitors.	
		"hub" from which people would move out into other parts of the Range. Retaining the 'Tourist' site as shown upon the Local Structure Plan would create a precedent for landowners to the north and south along the Moresby Range to site buildings in locations of high visibility and alter the backdrop landscape to Geraldton that the community has made clear it wishes to remain undeveloped.		
12 (13-03-14)	Department of Education	 The Department of Education has reviewed the document and wishes to advise the following: The proposed 4ha site and location appear suitable for the primary school. It appears that a three street frontage surrounds 		Note Submission
		the proposed school, the Department has a requirement that circulation around the school satisfies good traffic management principals.		

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
13 (18-03-14)	Private Landowner	Another plan in isolation that gives no perception to Geraldton's future in its entirety. There are a number of other incoherent statements made in the submission which appear to have no relevance to the proposal.	The City's Strategic Community Plan has a vision to sustain a population of 80,000 to 100,000 people. The Moresby Heights site represents a consolidated landholding which provides potential for a master planned and serviced community to be progressively delivered to meet demand.	Dismiss Submission
14 (17-03-14)	Private Landowner	Regarding possible road, face of range to tourist and lookout point. A similar road has been in place on the range face of my property since 1960. There was a heavy rainfall event in late May 1999 with continuous heavy rain and runoff from the slope above. Instability of the undercut hillside resulted in slippages on to the roadway. In my opinion, the only responsible course is a road connecting with proposed foothills road at the northern public recreation area. This road, extending southeast would be simpler, safer and less costly. Extending south along the property to the east, the road would contribute to the future park.	With regard to the road access to the eastern most Tourism site, the City does agree that road access from the east is a far more beneficial outcome, both economically and visually. However, at present land ownership is a significant issue that may hinder road access from being accomplished. In this situation it is appropriate for the City to strongly promote road access to the site from the east, but to also allow for alternative access arrangements to occur if landownership issues prevent it. Alternative access to the tourist site from the west would only be supported if all options for eastern access were exhausted and only if backed up by comprehensive assessment to demonstrate that the access does not have excessive visual impact.	Uphold Submission (in part) Modify the Local Structure Plan by replacing the wording in Section 5.6 of Part 1 with the following: "Whilst it is preferable that access to the easternmost tourism site be from the east, if this is not achievable then prior to lodgement of subdivision application to create the easternmost Tourist site, a Visual Landscape Assessment and Management Plan

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
14 continued				shall be prepared demonstrating to the satisfaction of the relevant authority how access to the site from the west is to be provided in a manner which achieves visual integration and appropriate siting."
15 (18-03-14)	Private Landowner	Object. The reason we purchased our property was to have peace and quiet in a rural setting. The proposed plan will turn our location into a thoroughfare. A main access road, Hackett Road, will run the full length of our land. Vehicle noise all day and night will be a result. We will also be looking down into backyards where as we currently look out at a quiet rural setting. There are other developments in Geraldton which should be finished first.	Arnold Road is estimated to attract approximately 1,270 additional vehicles per day, which represents less than 12% of the volume projected to access the external road network from the site, at full development. The projected increase in traffic along this road will remain within the threshold for a local road and, as such, whilst it will experience additional traffic, its status and applicable standards will not change. The City's Strategic Community Plan has a vision to sustain a population of 80,000 to 100,000 people. The timing of the release of the land will be a decision made in the economic climate at that time. The land may well remain "as is" for some time. Forward planning for the site should be progressed to enable the timely release of land as demand warrants.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 (17-03-14)	Private Landowner	Object. The structure plan covers part of an area previously covered by the Moresby Range Management Plan. The structure plan has incorporated housing densities at significantly increased levels to those of the forerunning plan, reflecting the commercial self-interest of the structure plan's proponents at the direct expense of existing local residents.	The Moresby Range Management Plan (MRMP) 2010 provides guidelines to assist the community, landowners, local governments and other agencies in the creation of a consolidated regional park. The MRMP also recommends that landowners 'should receive a fair and reasonable exchange for placing their land into a Park. This exchange may involve a mix of purchase, land swaps and development opportunities and would be determined on a case by case basis'. It is also worthy to emphasise that giving up portions of the Moresby Range essentially to the broader community is voluntary. The landowner is required to give up on 10% of gross subdivisible area for public open space, however in this instance the landowners has provided 41% public open space. This includes 79ha of the Moresby Ranges which will form part of a possible regional park and an additional 13ha to form a District Recreational area. The structure plan deviates from the MRMP in so far that more in-depth research has been done to demonstrate that the increased densities within the development will not undermine the visual amenity. While higher densities are proposed the general principals of graduating lot sizes and layout in response to the sites contours and attributes as demonstrated in the MRMP has been followed.	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued			The structure plan has been subject to detailed analysis to ensure no excessive impact on landscape and visual amenity, consistent with the WAPC's guidelines.	Dismiss Submission
			The Visual Impact Assessment Report (VIAR) submitted as part of the structure plan provided a much more detailed review than the broader one undertaken as part of the Moresby Range Management Plan. This included assessing the visual impact from a number of prominent sites within the City, including from the City Centre and HMAS Sydney Memorial.	
			The VIAR concluded that development can occur without detriment to the broader and contextual landscape, subject to the application of a number of visual management measures which include:	
			Sitting of higher density areas in areas of least visual exposure and lower density in higher parts of the site (a general principle within the Moresby Range Management Plan);	
			 Preservation of the Range face; Retention of remnant vegetation where possible; 	
			Revegetation of native plant species;	
			 Application of design guidelines to control use of materials and colours; and 	
			 Separate detailed assessment of any development proposed on top of the escarpment and the construction of a road up to it. 	

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		The structure plan also includes residential development densities which are far higher than those that apply to local residents in the adjacent Waggrakine Structure Plan, despite occupying the same if not higher altitudes and with the same need to preserve visual amenity and remnant native vegetation. This is highly anomalous and requires either a substantial overhaul or review of the Waggrakine Structure Plan by Council and the WAPC or similar restrictions applied to the structure plan, restricting minimum lot size to 1ha across the entire development.	The Waggrakine Rural Residential Structure Plan states that properties within the Development Investigation Area have potential for 'Future Urban' development which may support development into similar sized allotments as seen in the structure plan. The objective for areas outside of the Development Investigation Area is for subdivision that supports positive biodiversity outcomes particularly through the retention of remnant vegetation. The structure plan has been designed with a similar approach; with areas of remnant vegetation either incorporated into public open space and drainage networks or located within conservation lots. Other areas not constrained by remnant vegetation or by visual amenity issues contain higher density development. The Moresby Heights site represents a consolidated landholding which provides potential for a master planned and serviced community to be progressively delivered to meet demand, rarely achievable within areas of fragmented ownership.	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		There will be a substantial loss of native fauna that currently inhabits the local area (mobs of kangaroos, large bungarras/monitor lizards, Redtail Black Cockatoos, Tawny Frogmouths/Nightjar birds, Australian Hobby birds, echidnas etc.) and existing provisions within the plan are inadequate in this regard.	The structure plan is accompanied by an Environmental Assessment Report (EAR), which outlines that a number of fauna species could be located within the site, however due to the degraded nature of the habitat the likelihood is low. The EAR did state that foraging habitat for Carnaby's and Baudin's Cockatoo is present in some areas of existing vegetation across the site. A number of management measure were suggested in the EAR and have been incorporated into the design of the structure plan, including: • Retention of remnant vegetation and siting within POS and large covenanted lots; • Revegetation of native species within POS and streetscapes; • Creation of an ecological corridor from the rural residential lots in the west to the Moresby Ranges in the east; and • Creation of a Public Open Space Management Plan at the subdivision stage to ensure long term protection and viability of flora and fauna habitats. The EAR has been assessed by the Environmental Protection Authority which has advised that the report submitted adequately outlines the environmental issues and proposed management measures.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		The structure plan gives inadequate consideration to the issue of elevated traffic that will materially impact existing residents along Arnold Road, Tramway and Hackett Road apart from saying [the subdivision] "may require some upgrading such as provision of kerbs and wider carriageways" but that: "The majority of roads are expected to carry less than 1,000 vehicles per day, with all but one (the Tramway Rd extension) expected to carry less than 3,000 v.p.d." (p15). While 1,000 v.p.d might be considered trivial by the report's authors, this is clearly not the case for local residents. Currently, I would estimate less than 10 vehicles per day pass our house and so the lack of any civic infrastructure such as footpaths, street lighting or kerbs along Arnold Road, which possesses a sharp narrow bend, is not problematic. I consider the provisions in the existing structure plan to be highly inadequate given the substantial forecast change to local road traffic that is acknowledged in the report and the contingent impact on road safety for existing residents, road users and pedestrians. Certainly, the report's statements on these matters that: "details and timing of improvements is proposed to be further assessed and determined at subdivision" is grossly insufficient and this plan should not be allowed to proceed without more thorough investigations being undertaken and more appropriate and advanced commitments incorporated in to the structure plan, particularly given the very limited local government financial capacity to make up for any shortfall by the	A Transport Report has been provided by the applicant and provides an analysis of daily traffic based on a trip rate of 9 daily vehicle trips per dwelling which is in line with Road Traffic Authority and WAPC Guidelines. The development results in the generation of up to 16,200 vehicle movements per day of which 11,300 vehicles per day can be expected to access the external road network. While the potential impact of increased traffic on existing owners is acknowledged, all external roads, apart from Tramway Road, will continue to function as local roads which have the capacity to carry up to 3,000 vehicles per day. While traffic increases will remain within the limits of the current road functions, the Transport Report also states that a number of treatments at intersections, traffic management and upgrades will be required within the external road network to ensure the increased traffic amounts will be appropriately accommodated. The Transport Report does include some level of detail as to what types of upgrades may be required and at what intersections, however it is more appropriate that highly detailed design information is supplied at the time of development and therefore can be conditioned as part of subdivisional works. However since during the advertising of the structure plan the City's engineers highlighted a number of specific traffic requirements that will need to be addressed with further detail at the subdivision stage.	Uphold Submission (in part) Modify the Local Structure Plan by adding a new clause in Section 5.6 of Part 1 as follows: "Prior to any subdivision, an updated Traffic Report shall be prepared which addresses the following: • Through traffic counts on Tramway, Hall, David, Sutcliffe, Hackett and Chapman Valley Roads; • Turning movement counts on the following intersections: North West Coastal Highway – Tramway Rd, Sutcliffe Rd – Chapman Valley Rd and Hackett Rd – Chapman Valley Rd;
		developer further down the track.		

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		The detail of how the developer has justified its vehicle forecasts is also inadequately disclosed and as such should not be relied on.	Given the extended timeframe for the development of the site, subdivision applications should be accompanied by an updated Traffic Report.	 Intersection assessment and recommendation s for the following intersections: Tramway Road – Hall Road, Tramway Road – David Road and Arnold Road – Sutcliffe Road; Sidra analysis (or similar) and recommendation s for the following intersections: North West Coastal Highway – Tramway Road, Sutcliffe Road-Chapman Valley Road, Hackett Road – Chapman Valley Road; and Local area traffic management device proposals to address long straight road alignments and four-way intersections within the development area.

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued				Prior to any subdivision application being lodged in excess of 4 years from the operation date of the structure plan (as defined in section 4.0), an updated Traffic Report shall be prepared. Thereafter, any further subdivision application shall be accompanied by a Traffic Report not greater than 4 years old."
		Our family lives on Arnold Road, in a house that is approx. 15-20m from the roadside with an open boundary to the road and we have two small children. We, along with many other residents in the area, enjoy living in this location due to the quiet road that make dog walking, jogging and bike riding with children pleasurable and safe and indeed invested our life savings to achieve this.	Arnold Road is estimated to attract approximately 2,190 additional vehicles per day, which represents less than 20% of the volume projected to access the external road network from the site, at full development. The projected increase in traffic along this road will remain within the threshold for a local road and while it will experience additional traffic, its status and applicable standards will not change.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		The Moresby Range and adjacent Waggrakine area is noted for the prevalence of underground streams and many existing properties have equipped bores, some of which may be used to supplement household water. I believe the hydrology research incorporated into this report has inadequately surveyed and mapped these existing streams and bores and without investigating and modelling more thoroughly, runs the risk of polluting existing bores in the area given the high density and location of this development close to the Moresby Range and its stated proposed reliance on septic systems for all residences, even at these high housing densities. The issue of possible winter	A Local Water Management Strategy (LWMS) was prepared by the applicant as part of the structure plan. The LWMS identifies the 2 seasonal wetlands and the three natural drainage lines present on the site and incorporate them into the open space network. The LWMS requires nine drainage catchments (with an additional 4 subcatchments) and provides preliminary storage calculations. Further detailed investigations will be conducted	Dismiss Submission
		Over the past decade, Geraldton has been subject to population growth of a little under 2% per annum. This was a decade characterised largely by considerable optimism for potential growth. However, given recent economic setbacks (i.e. the effective shelving of the Oakajee Port and Rail project and slowing pace of development to the regional resources sector) I believe we are extremely unlikely to see any acceleration to this figure over the medium term, given existing State Government policy settings, and slower population growth should realistically be anticipated.	as part of the Urban Water Management Plan which will be required at subdivisional stage. The City's Strategic Community Plan has a vision to sustain a population of 80,000 to 100,000 people. The timing of the release of the land will be a decision made in the economic climate at that time. The land may well remain "as is" for some time. Forward planning for the site should be progressed to enable the timely release of land as demand warrants.	Dismiss Submission
		Currently, there are a number of subdivisions across Geraldton that have failed to achieve full subscription and the local property market for larger (0.5 acre plus) size blocks remains highly subdued. Certainly, in the area in which this development is proposed, land and property values have fallen significantly from the highs of recent years (falls of 30-40% have been observed), demand remains depressed in this market sector and local properties remain unsold for extended periods despite substantial price falls.	There is no justification to delay structure planning in areas identified for development simply because development has not occurred in other areas. In essence, the planning issue for consideration by a local government is not whether a proposal will adversely impact on the value of land but whether the proposal will have an adverse impact on the amenity of the locality.	

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		With considerable block creation poised in Geraldton with developments to the south of Geraldton (including the Karloo Housing Project), and good block availability to the North with a spate of subdivisions in recent years and many established blocks in the area not yet subdivided, scheduling such significant block creation as a result of the structure plan will drastically compound the general block oversupply situation in Geraldton. This will depress the appeal of the Geraldton market for potential new investors, reduce prices further and reduce the real household wealth of existing Geraldton homeowners, depressing the regional economy, at a time when the regional economy is experiencing weak business conditions. Indeed, the very expectation that this project is pending will negatively impact local prices and land buyers	Accordingly, a submission that suggests a proposal will have an adverse impact on the value of land can be disregarded unless it can be shown that the reason for the reduction in value is due to an adverse impact on the amenity of the locality. There is no such evidence.	
		appetite at this juncture. The structure plan has allocated a space for a new primary school should the structure plan proceed. However, this year Geraldton has enjoyed the opening of Wandina Primary School, the first new public school to open since Waggrakine Primary School opened in 1979. Given the capacity that remains at the new and existing schools, it is unlikely that an additional public primary school will be forthcoming for many years. And indeed should school census numbers support the case for a new school, it is generally accepted as more likely that a new school would be located in or near Drummond Cove. Drummond Cove is currently included in Waggrakine's catchment despite being a considerable distance away.	The Department of Education have requested the provision of the Primary School site within the structure plan area. Construction and delivery of the school will be determined by the Department of Education once demand is sufficient.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
16 continued		The reality is that the DOE is unlikely to plan a school in this proposed new suburb for decades, which would ultimately reduce its appeal for many families, and reduce the likelihood that the developer could successfully sell these planned blocks. As a result, this development would in my considered opinion only add to the existing overhang of unsold suburban blocks across the City.		
17 (19-03-14)	Private Landowner	Object. It is obvious when driving through Geraldton just how much vacant/undeveloped land there is in town and I wonder if it wouldn't be more cost effective to offer incentives for landholders to develop these blocks than having to expend limited resources to create a new development for which there is little existing demand.	The City's Strategic Community Plan has a vision to sustain a population of 80,000 to 100,000 people. The timing of the release of the land will be a decision made in the economic climate at that time. The land may well remain "as is" for some time. Forward planning for the site should be progressed to enable the timely release of land as demand warrants. There is no justification to delay structure planning in areas identified for development simply because development has not occurred in other areas. The cost of developing the site largely falls to the developer, not the City.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
17 continued		We are unable to subdivide our block in a reasonable manner and believe that the developers will be potentially unfairly, and perhaps illegally favoured by being able to subdivide the land into suburban sized blocks. How can it be fair that one group may be favoured in this manner while another, being the existing landholders on Arnold Road, be denied the opportunity to capitalise on their existing assets in the same way?	The Waggrakine Rural Residential Structure Plan states that properties within the Development Investigation Area have potential for 'Future Urban' development which may support development into similar sized allotments as seen in the structure plan. The objective for areas outside of the Development Investigation Area is for subdivision that supports positive biodiversity outcomes particularly through the retention of remnant vegetation. The structure plan has been designed with a similar approach; with areas of remnant vegetation either incorporated into public open space and drainage networks or located within conservation lots. Other areas not constrained by remnant vegetation or by visual amenity issues contain higher density development. The Moresby Heights site represents a consolidated landholding which provides potential for a master planned and serviced	Dismiss Submission
		The increase in traffic on Arnold Road from maybe a	community to be progressively delivered to meet demand, rarely achievable within areas of fragmented ownership. Arnold Road is estimated to attract	Note Submission
		dozen vehicle movements a day to a proposed ~1,000 would create an intolerable impact on our amenity. Our residence is very close to the road and we invested our capital in a property that we thought would be peaceful and conducive to raising a young family in a safe and quiet area.	approximately 2,190 additional vehicles per day, which represents less than 20% of the volume projected to access the external road network from the site, at full development. The projected increase in traffic along this road will remain within the threshold for a local road and, as such, whilst it will experience additional traffic, its status and applicable standards will not change.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
17 continued		The installation of footpaths and street lighting along Arnold Road and the accompanying noise and light pollution along with the increased vehicular traffic, in particular the heavy vehicles that would use the road during the construction phase that could only increase the dust and particulate pollution, would combine to make living in our property a very unpleasant experience. Given the fact that Wandina has only just been able to	The Department of Education have requested	Note Submission
		secure a public primary school, I find it hard to believe how the proponents can claim in good faith that the development will have a primary school built there. It is obvious that the lack of a primary school will result in vehicular traffic, transporting children to and from Waggrakine Primary School, far in excess of the current estimates.	the provision of the Primary School site within the Local Structure Plan area. Construction and delivery of the school will be determined by the Department of Education once demand is sufficient.	
18 (18-03-14)	State Heritage Office	It is worth highlighting that P12059 – Geraldton-Northampton Railway Precinct is on the Heritage Council's Assessment Program and adjoins the Plan area on its western boundary. As a direct consequence of this Assessment Program P12059 may, at a future date, become a State Registered Place.	Plans available on the Heritage Council's website indicate that the rail line ran along to the North West Coastal Highway alignment some distance from the site, with a spur running up Tramway Road to reserve 11437 adjoining the site's western boundary, through which Tramway Road is proposed to connect.	Note Submission Modify Part 2 of the Local Structure Plan document by inserting reference to the location and status of the
		Any future development plans may therefore need to take account of potential impact on the cultural significance of this heritage place, especially in light of the proposal to extend Tramway Road across P12059. In particular, more detailed consideration may be given to the realignment of this road to reduce direct or indirect impacts on the heritage place.	Whilst the site is not formally listed as a State Registered Plan, Part 2 of the Local Structure Plan report could be updated to include reference to this. Incorporation of some reference to the history of the site could also potentially be incorporated into the Tramway Road extension if considered appropriate.	Geraldton- Northampton Railway Precinct and notating where interpretation could be incorporated into the future Tramway Road extension.

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
19 (21-03-14)	Department of Health	Water and Sewerage: All developments are required to connect to scheme water and reticulated sewerage in order to comply with the draft Country Sewerage Policy. A sewerage scheme operated by an ERA licenced sewerage provider as proposed is acceptable but is subject to suitability and availability of land to dispose of wastewater. The use of recycled wastewater will require separate approval of the DOH.	The developer is aware of the water and sewerage servicing requirements for the development.	Note Submission
		Public Health Impacts: The structure plan should also acknowledge the DOH's Guidelines for the Separation of Agricultural and Residential Land Use as a means to help avoid conflict and potential adverse health effects and nuisance impacts from agricultural chemical use, dust and other rural pursuits.	The residential component of the structure plan is separated from surrounding agricultural areas by the Moresby Range and larger rural-residential lots.	Note Submission
20 (20-03-14)	Private Landowner	Object. We believe efforts should be made to retain the slopes of the Moresby Range in their natural state and only allow strictly controlled access to the top of the range for tourism purposes (e.g. look out, park land). Whilst our property does have a limited sea view, we like many others prefer looking at the Range and the beauty it provides in its natural state. A wider buffer zone needs to be established and maintained so the Range can be enjoyed by future generations.	The eastern portion of the site, being a total of 79 hectares, is to be reserved a Regional Open Space and potentially included at some future date within a 'Moresby Range Regional Park'. As per the Moresby Range Management Plan the eastern portion of the site which forms part of the 'broad landscape features that should be preserved and enhanced' will be secured and public access will be promoted and enhanced to two 'Tourist Sites' as notated on the Local Structure Plan. By locating higher density development within the lower areas of the site, the lower density development within the high altitude areas and by securing the footslopes of the Moresby Ranges as a Regional Park, the visual impact on existing residents and the community will be reduced.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
20 continued		We purchased our property to facilitate the lifestyle we wanted – a quiet neighbourhood, natural surroundings, wildlife in its natural environment, a safe place for our children to explore and pursue a "rural lifestyle" on a small scale. We have been able to use our property to run sheep, poultry and an apiary. We	Restrictions on keeping of livestock are understood to already apply to Waggrakine and there would be no change to these rates with this proposal. The location of larger rural residential lots	Note Submission
		are concerned that we will have restrictions placed on us to what stock we can keep and how many animals we can keep if the area is developed.	surrounding the periphery of the structure plan area, abutting the existing rural residential areas to the south and west will ensure impacts to amenity and the conditions currently enjoyed by residents should be minimal.	
		Our property had a small natural creek until other surrounding owners altered the natural waterway. When we first moved into the area there was a wetland (we call it a swamp) at the end of Arnold Road. Over the years, mainly due to a number of drier winters and the alteration of the natural waterway, this "swamp" has almost disappeared. A climate change to wetter winters could cause erosion problems on our property if the landscape is significantly changed.	The Local Water Management Strategy and subsequent Urban Water Management Plans need to cater for future rainfall and incorporate modelling for infrequent events, not just recent 'drier winters'. As such, the proposal should have no adverse impact on local hydrology. The extension of Arnold Road has been designed to skirt the wetlands to the south west of the site, rather than traverse it.	Note Submission
		We also notice that in the proposed plan Arnold Road will become an access road to the development. Extending the road through this former "wetland" in the future could be a problem is there is a return to wetter winters.		
		We have observed several varieties of orchids growing in the area over the years. They come and go depending on the climate and whether sheep are grazing in the area. It would be a pity to see them disappear altogether as the land is cleared.	A number of management measure are suggested in the Environmental Assessment Report and have been incorporated into the design of the structure plan, including:	Note Submission
		Groups of kangaroos are frequently seen in the area – usually early in the morning and late in the afternoon. Clearing and developing the area will see them disappear from the area.	 Retention of remnant vegetation and siting within POS and large covenanted lots; Revegetation of native species within POS and streetscapes; 	

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
20 continued		Rabbits have destroyed our gardens for years – revegetating the area will be costly if some sort of programme is not implemented to control them.	 Creation of an ecological corridor from the rural residential lots in the west to the Moresby Ranges in the east; and Creation of a Public Open Space Management Plan at the subdivision stage to ensure long term protection and viability of flora and fauna habitats. 	
		Rough calculations show that 285 hectares of land will be available for 1,500 to 2,000 lots. Based on 1,500 lots being developed, each lot would be 0.19ha. The proposed development shows there will be larger lots on the perimeter and scaling down to "R20" (which is between 440m² and 550m²) – that's pretty intense development. Owners of larger properties in the Waggrakine area have been trying to get permission to subdivide their properties to create smaller lots for many years. Subdivision can now proceed in some areas – at a substantial cost and block sizes cannot be anywhere near some of the sizes set out in the proposed development area. This is a bit unfair and uniformity would be good.	The proposal incorporates a variety of lot sizes, providing a range of options and lifestyle choices. The Waggrakine Rural Residential Structure Plan states that properties within the Development Investigation Area have potential for 'Future Urban' development. The objective for areas outside of the Development Investigation Area is for subdivision that supports positive biodiversity outcomes particularly through the retention of remnant vegetation. The structure plan has been designed with a similar approach; with areas of remnant vegetation either incorporated into public open space and drainage networks or located within conservation lots. Other areas not constrained by remnant vegetation or by visual amenity issues contain higher density development. The Moresby Heights site represents a consolidated landholding which provides potential for a masterplanned and serviced community to be progressively delivered to meet demand, rarely achievable within areas of fragmented ownership.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
20 continued		It seems that Arnold Road will become an access road should this development proceed. We are strongly opposed to this happening. We don't believe the road can handle the volume of traffic which is anticipated without substantial clearing of roadside vegetation. This clearing will be necessary to give property owners greater visibility if there is an increased volume of traffic. When looking at the development plan it is not clear what will occur at the southern end of Arnold Road. Presently, Bore Road becomes Arnold Road. Will there be an extension from Chapman Valley Road or will it remain as it is? Should it remain as is, we feel the bend at the top of Bore Road will need some attention. It is quiet sharp and in the early morning and late afternoon the sun is blinding resulting in very poor visibility. Because of the steep incline of Bore Road, it is well used by cyclists in training. It is also well used by pedestrians and horse riders as well as being on the school bus route. An increase in traffic could prove hazardous.	Potential upgrades to Arnold will be reviewed at the subdivision stage. It should be noted that the safety and sight line standard of Arnold Road is not proposed to alter as a result of this proposal. The projected increase in traffic along this road will remain within the threshold for a local road and, as such, whilst it will experience additional traffic, its status and applicable standards will not change.	
		We would be in favour of a development planned allowing the area to be developed incorporating a suitable 'lot free buffer zone' and then 2 hectare and 4 hectare lots allowing the slopes of the Moresby Range to remain "rural" and in as natural a state as possible.	The City's Strategic Community Plan has a vision to sustain a population of 80,000 to 100,000 people. The structure plan provides a transition in intensity of development through the provision of rural-residential lots, larger residential lots and public open space around the periphery of the development. The Visual Impact Assessment Report (VIAR) submitted as part of the structure plan included assessing the visual impact from a number of prominent sites within the City, including from the City Centre and HMAS Sydney Memorial.	Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
20 continued			 The VIAR concluded that development can occur without detriment to the broader and contextual landscape, subject to the application of a number of visual management measures which include: Sitting of higher density areas in areas of least visual exposure and lower density in higher parts of the site (a general principle within the Moresby Range Management Plan); Preservation of the Range face; Retention of remnant vegetation where possible; Revegetation of native plant species; Application of design guidelines to control use of materials and colours; and Separate detailed assessment of any development proposed on top of the 	
21	Private Landowner	Support (conditional).	escarpment and the construction of a road up to it. The structure plan only applies to the site and no	Note Submission
(21-03-14)		The Moresby Heights Local Structure Plan is supported, in so far that it promotes commercial and residential development in the area and does not burden other land owners with environmental limitations on the use of their own land. That is, the Plan is not supported if the City intends to burden neighbouring land users with conservation covenants and environmental limitations. That would be to unfairly and inequitably cast the burden of	other surrounding land which is subject to its own planning controls.	
22 (19-03-14)	Western Power	environmental protection on others. The planning advice you have provided has been noted in our planning database in advance of our next review of network capacity requirements.		Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
23 (21-03-14)	Water Corporation	The Water Corporation does not object to this development in principle; however it is subject to the following advice. Water: The proposed development was not included in the current water scheme planning for Geraldton. The proposed development has been included in the current review of the Geraldton Regional Water Supply Scheme, due for completion by the end of 2014. There is no existing capacity to serve any staging of	The developer has been in close contact with the Water Corporation and is aware of the current water planning and its implications on the development.	Note Submission
		Moresby Heights development form the existing Hackett Road water tank zone and related infrastructure. The current reserve/operating storage of the Hackett Road Tank is insufficient. There is sufficient capacity to serve the area shown as stage 2 of approx. 50-100 lots for an initial period until the planning review is complete at the end of 2014.		
		Wastewater: The proposed development was not included in the current wastewater conveyance and treatment and discharge planning. A review of the wastewater planning for the northern Geraldton area is currently programmed, and due to be completed 2014/2015. The review shall include the proposed development.	The developer has been in close contact with the Water Corporation and is aware of the current wastewater planning and its implications on the development.	Note Submission
		The Corporation understands that any alternative technology service options proposed shall be managed, owned and operated by an alternative service provider. The Corporation has not received a formal request to consider alternative technology service options.		

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
24 (21-03-14)	Private Landowner	Indifferent. Before approval is given to the development ask that developers extend Sutcliffe Road to the Structure Plan to disperse traffic from Arnold Road which it would appear to be expected to carry the greatest percentage of traffic from the proposal. Or alternatively, extend unnamed road from Sutcliffe Road to Arnold Road to disperse traffic from Arnold Road.	Arnold Road is estimated to attract approximately 2,190 additional vehicles per day, which represents less than 20% of the volume projected to access the external road network from the site, at full development. The projected increase in traffic along this road will remain within the threshold for a local road and, as such, whilst it will experience additional traffic, its status and applicable standards will not change. The connection of Sutcliffe Road into the development was not considered appropriate as it would result in an additional break across the linear open space connecting up to the Moresby Range while servicing a relatively smaller area.	Note Submission
25 (24-03-14)	Private Landowner	Indifferent. I would like to have the developers add another outlet road by extending Sutcliffe Road to the development to disperse traffic away from Arnold Road. By studying the structure plan Arnold Road is almost certain to attract 90% of traffic from the proposal. We already have enough hoons that think Bore and Arnold Roads is a race track.	Arnold Road is estimated to attract approximately 2,190 additional vehicles per day, which represents less than 20% of the volume projected to access the external road network from the site, at full development. The projected increase in traffic along this road will remain within the threshold for a local road and, as such, whilst it will experience additional traffic, its status and applicable standards will not change. The connection of Sutcliffe Road into the development was not considered appropriate as it would result in an additional break across the linear open space connecting up to the Moresby Range while servicing a relatively smaller area.	Note Submission
26 (04-04-14)	Department of Planning (Tourism)	Commend the Structure Plan for identifying tourism and undertaking design response considerations, such as screening to hide buildings so they do not dominate the landscape, which have a positive outcome from a tourism perspective. Supportive of the land use and subdivision requirements for the 'Tourist' zone as well as the requirement for the 2 parcels to be guided by Detailed Area Plans.		Note Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
27 (21-03-14)	Main Roads WA	The traffic report highlights that the increase in traffic would trigger a need for various upgrades to various intersections on the local road networks.		Note Submission
		Main Roads highlights the need for consideration of the best process for securing the funds required for road upgrades, whether through a Developer Contribution plan or whether other conditions could be imposed at the subdivision stage to satisfactorily address the needs of the road infrastructure.		
28 (28-03-14) & (03-06-14)	Department of Water		Originally the Department objected to the Local Water Management Strategy (LWMS) however have since advised they have no objections subject to the requested information being provided (as agreed with the Department and the proponent).	Note Submission
		The LWMS should be prepared consistent with the DoW's guidelines and a check list provided.	Checklist to be provided outlining what has been included in the LWMS.	Uphold Submission LWMS (Appendix D of Appendix 7) to be modified to include a Checklist.
		No Executive Summary is provided. Key points and findings, and further work to be done prior to the Urban Water Management Plan stage, need to be included as a summary.	Executive summary to be provided.	Uphold Submission LWMS (Appendix D of Appendix 7) to be modified to include an Executive Summary.
		A LWMS document should address all elements of the total water cycle that are relevant to the development area and associated catchment. It should provide a "proof of concept" (method or ideas to demonstrate its feasibility with conceptual designs) for how water related issues will be addressed. While the document has included the design criteria, overall information is broad.	The Department originally did not examine the entire LWMS document (including relevant appendices).	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
28 continued		Conceptual landscape 'plans' are included in the Structure Plan report (Figures 11, 15, 16, 17 & 18), and stated in the report that detailed Landscape and POS plans will be developed pending endorsement of the Structure Plan. These plans should supplement and inform the LWMS and should not be deferred.	Public Open Space Landscape and Management Plan and an Urban Water Management Plan (including more detailed geotechnical assessment demonstrating soil permeability) are stipulated requirements of subdivision under Clause 5.7 of Part 1 of the draft Local Structure Plan. The preparation of detailed landscape plans consequently is considered unnecessary at this stage of the process. Requirements for detailed plans already exist as a component of the subdivision process.	Dismiss Submission
		The Plan showing test pit locations is unclear and is requested this be revised.	A clear test pit location plan should be provided. It is considered that the Geotechnical is	Uphold Submission (in part)
		Section 2.3 of Appendix 7 should include a discussion of potential infiltration problems with the Moresby soil type. Appropriate hydrological and hydraulic investigation/modelling should be provided at the LWMS stage to support the development.	adequate for confirming concept for this stage of obtaining Structure plan approval. Clause 5.7 d) of Part 1 of the Local Structure Plan requires a further geotechnical investigation to be completed and submitted to the City as part of the subdivision.	LWMS (Appendix D of Appendix 7) to be modified to include a clear Test Pit Location Plan.
		The identified areas of potential Acid Sulphate Soils have not been adequately investigated and are adjacent to wetland areas, where disturbance for 'integrated drainage' locations are proposed to be located. Areas adjacent to wetland areas should be tested for Acid Sulphate Soils and borelogs for these sites be provided for review.	The areas of Acid Sulphate Soils risk identified in the site are very minor and located in proposed in POS. If areas area to be disturbed or dewatering is to take place, further assessment would be undertaken as per standard process as part of the subdivision application.	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
	•			
28 continued		Information provided on the LWMS is not sufficient to satisfy the DoW that "management of superficial groundwater would not require monitoring" as indicated by the LWMS. The DoW recommends conducting additional groundwater level monitoring tests at the site covering the time when maximum groundwater level is expected.	Anecdotal evidence (including readings from May 2014) indicates the groundwater level is between 5 and 15+ m below the surface and groundwater is not an issue for the area due to its elevation. Whilst it is considered that no additional groundwater monitoring is required at this structure planning stage, it is proposed that as a condition of the subdivision that Groundwater monitoring points be installed to a minimum of 5 m depth (which can be completed with the geotechnical investigation and groundwater levels taken quarterly for a period of 2 years to demonstrate groundwater is not an issue during the wetter months.	Uphold Submission (in part) Part 1, Clause 5.7 d) of the Local Structure Plan document be amended to read: "Urban Water Management Plan (including more detailed soil geotechnical assessment demonstrating soil permeability and two years of quarterly groundwater level monitoring from up to 5 bore sites. If groundwater is found to be above 3 m, a remediation plan is to be developed and agreed) (City of Greater Geraldton in consultation with Department of Water)"
		Preliminary consultation with DoW has occurred, with sufficient groundwater identified as available for irrigation purposes. No water efficiency details have been provided.	The landscape areas will be developed in accordance with the POS Landscape and Management Plans. This is not considered to be a critical issue at this the structure planning stage and will be addressed as design progresses.	Dismiss Submission

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
28 continued		If treated wastewater is proposed for irrigation, quality of water should be fit for purpose and acceptable to the receiving water.		Note Submission
		In addition, any proposal for the use of treated effluent for irrigation needs to address the DoW's Guideline for the approval of non-drinking water systems in WA.		
		The locations and area required for stormwater management infrastructures and approximate sizes of these infrastructures are to be determined.	The Department originally did not examine the entire LWMS document (including relevant appendices).	Dismiss Submission
		There are no plans for the 100 yr or 5 yr events. Flowpaths have not been indicated. Feasibility of storing stormwater on site is to be determined.		
		The document assumes that post-development hydrological condition will be at post-development stage by using soakwells and/or rainwater tanks within the residential lots using council's policy and building codes. Proof of concept/conceptual design with examples is to be included.		
		Generally, the DoW does not prefer a particular modelling or approach over another.	The Rational method is a conservative approach and adequate for demonstrating proof of concept at this the structure planning stage.	
		In addition, it is recommended to use the terminology "On site stormwater management' rather than "On site disposal of stormwater" (page 17, 4.3) and "safe conveyance of runoff" rather than "disposal of runoff" (page 3, 1.5, first para).	Terminology should be revised although there is no specific reference to "On site disposal of stormwater" on page 17, section 4.3.	LWMS (Appendix D of Appendix 7), page 3 section 1.5, replace "disposal of runoff" with "safe conveyance of runoff".

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
28 continued		Although it is stated that no groundwater was encountered in test pits, the vegetation associated with the wetland areas, and other vegetation in nearby areas with recognised conservation value, may be groundwater-dependent. This should be investigated prior to development with the installation of monitoring bores adjacent to wetland areas.	Anecdotal evidence (including readings from May 2014) indicates the groundwater level is between 5 and 15+ m below the surface and groundwater is not an issue for the area due to its elevation. Whilst it is considered that no additional groundwater monitoring is required at this structure planning stage, it is proposed that as a condition of the subdivision that Groundwater monitoring points be installed to a minimum of 5 m depth (which can be completed with the geotechnical investigation and groundwater levels taken quarterly for a period of 2 years to demonstrate groundwater is not an issue during the wetter months.	Uphold Submission (in part) Part 1, Clause 5.7 d) of the Local Structure Plan document be amended to read: "Urban Water Management Plan (including more detailed soil geotechnical assessment demonstrating soil permeability and two years of quarterly groundwater level monitoring from up to 5 bore sites. If groundwater is found to be above 3 m, a remediation plan is to be developed and agreed) (City of Greater Geraldton in consultation with Department of Water)"

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
		1		
28		There is no discussion on the review of the LWMS	The only monitoring that has been identified is	Uphold Submission
continued		and no funding schedule for monitoring and maintenance. These should be included.	groundwater monitoring for a period of two years to confirm raised or perched water levels do not	(in part)
		maintenance. These should be included.	occur in winter.	Part 1, Clause 5.7
			Coodi III WIII.Ci.	d) of the Local
				Structure Plan
				document be
				amended to read:
				"Urban Water
				Management Plan (including more
				detailed soil
				geotechnical
				assessment
				demonstrating soil
				permeability and
				two years of
				quarterly
				groundwater level monitoring from up
				to 5 bore sites. If
				groundwater is
				found to be above 3
				m, a remediation
				plan is to be
				developed and
				agreed) (City of Greater Geraldton in
				consultation with
				Department of Water)"
				vvaler)