

City of Greater Geraldton – Lots 15 & 17 Brand Highway Structure Plan – Schedule of Submissions

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
<p>1 (21-04-2017) & (01-06-2017)</p>	<p>Department of Education (DOE)</p>	<p>It is noted that the school site has been identified as a 3.5ha site. The DOE can only accept a 3.5ha site if it is collocated with shared public open space. This is not identified within the structure plan.</p>	<p>The proponent has agreed to revise the Local Structure Plan to ensure that the proposed school site will be 4ha in size, 2ha of which is located entirely on Lot 17.</p> <p>The DOE has provided further advice that they have no objections to this revision of the Local Structure Plan.</p>	<p>Uphold submission.</p> <p>Modify the Local Structure Plan map, report and relevant technical appendices to increase the school site to 4ha in total.</p>
		<p>The lot yield for the Structure Plan is shown as 625 lots equating to approximately one third of a school catchment. Based on this rationale it is proposed in the structure plan that a proportionate amount of land is provided for the school site being 1.85ha.</p>	<p>Following the modification to increase the school site to 2ha on Lot 17, the applicant now exceeds their obligations in terms of provision of a future school site. The DOE has advised that at the time they acquire the title, negotiations will take place for the oversupply of the land and potential compensation.</p>	<p>Note submission.</p>
		<p>The location of the primary school over three lots with different owners makes obtaining the title for the school difficult if those land owners do not develop in a timely manner.</p> <p>Should the school be required to accommodate local students, the DOE would be unable to build if structure planning over Lot 477 and 500 has not commenced.</p>	<p>With the school site area on Lot 17 being increase to 2ha, the DOE is now satisfied this enables an initial stand-alone education facility and allows for the ongoing development of a school in a staged approach</p>	<p>Note submission.</p>
		<p>The DOE is concerned with the remaining 2ha which are outside the structure plan and are in the ownership of others. Some surety is requested to ensure those landowners will provide portions of their land towards the school site. We presume that as structure planning progresses in the south the remaining 2ha will be shown and agreed to.</p> <p>Written confirmation by the affected landowners is requested.</p>	<p>Any future structure planning of Lots 30 and 477 Scott Road, will require the school site to be shown and planned for.</p> <p>The two landowners were advertised to as part of the public consultation process and no response was received by either landowner.</p> <p>Written confirmation from landowners has never been a requirement at the structure planning stage.</p>	<p>Dismiss submission.</p>

City of Greater Geraldton – Lots 15 & 17 Brand Highway Structure Plan – Schedule of Submissions

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1 continued		<p>Section 3.6 states that the school site has been positioned on a site of least gradient. The DOE would require to undertake a due diligence site investigation carried out by its consultants to ensure the suitability of the proposed site.</p>	<p>The DOE has further advised that this due diligence will occur following the confirmation of the site.</p>	<p>Note submission.</p>
		<p>In previous correspondence between the DOE and the City in January 2014, a school site was identified in the Rudds Gully Structure plan (Figure 9) located entirely on Lot 17. Correspondence did not clarify if the site was to be 3.5ha or 4ha as it was then situated alongside public open space.</p>	<p>The Figure that the DOE refers to is the Rudds Gully Structure Plan which was included as a context plan in the Lot 9 Verita Road Local Structure Plan. The context plan does show a proposed school site wholly contained within Lot 17 but does not indicate a size.</p> <p>However, this plan was originally drafted in 2001 and was never endorsed by the WA Planning Commission.</p>	<p>Dismiss submission.</p>
		<p>In the previous structure plan the City has also shown another primary school site on the northern portion of Rudds Gully. This site is no longer shown and has been replaced with residential development. Clarification is sought on the proposed overall dwelling yield for the Rudds Gully area.</p>	<p>The DOE is referring to the Rudds Gully Structure Plan which was included as a context plan in the Lot 9 Verita Road Local Structure Plan.</p> <p>As part of the endorsement of the Lot 9 Verita Road Local Structure Plan investigations were undertaken into the lot yields and school catchments within the locality.</p> <p>The result of these further detailed assessments was that the catchment areas were reduced and the school site proposed on Lot 9 Verita Road was not required.</p> <p>The Lot 9 Verita Road Structure Plan has been endorsed by the WA Planning Commission.</p>	<p>Dismiss submission.</p>

City of Greater Geraldton – Lots 15 & 17 Brand Highway Structure Plan – Schedule of Submissions

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2 (01-05-2017)	Department of Parks and Wildlife (DPaW)	<p>No objection.</p> <p>The Executive Summary of the LSP states that vegetation within the study area is in 'good to degraded' condition. Parks and Wildlife is not aware, nor does it state, if a detailed flora survey has been carried out on the subject land, therefore the exact condition of the vegetation cannot be confirmed. Notwithstanding this, the <i>Geraldton Regional Flora and Vegetation Survey</i> identifies some remnant vegetation within Lot 17. Parks and Wildlife would normally recommend a detailed flora survey be carried out so that the condition of the vegetation can be ascertained. However, in this case the vegetation on Lot 17 appears sparse and degraded and therefore it is considered a vegetation survey would be of limited value.</p>		Note submission.
		<p>Executive Summary (pg. 5 iii) states that the vegetation condition is 'good to completely degraded'. Amend wording to 'appears to be completely degraded'.</p>	<p>The Executive Summary should be amended to reflect that in the absence of a detailed flora survey the condition of vegetation is an assumption only.</p>	<p>Uphold submission.</p> <p>Modify the Executive Summary (pg. 5) to read 'appears to be completely degraded'.</p>

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2 continued		<p>Reword Part 2 Section 2.1 (pg. 13) paragraph 1 to state the following in order to provide more clarity:</p> <p><i>According to the Department of Park and Wildlife data the subject land does not contain any Declared Rare Flors, Specifically Protected Fauna or Threatened Ecological Communities. Part of Lot 17 is within a Priority Threatened Ecological Community buffer.</i></p> <p><i>The land has been extensively cleared for agricultural uses (grazing and cropping) but contains a small pocket of remnant vegetation regrowth. The Geraldton Regional Flora and Vegetation Survey (WAPC DoP 2010) identifies this as Acacia rostellifera shrubland. No detailed flora survey has been carried out over the subject land, however the vegetation appears to be in a degraded condition. Refer to Figure 4 Site Plan aerial photograph of the subject land.</i></p>	<p>The wording suggested by DPaW provides additional clarification on the desktop assessment of the site.</p>	<p>Uphold submission.</p> <p>Modify Part 2 Section 2.1 (pg. 13) paragraph 1 as per the wording suggested by DPaW.</p>
		<p>Delete Part 2 Section 2.1 (pg. 13) paragraph 2 as the Geraldton Natural Areas Bushland Assessment assessed the condition of natural bushland on the City's 1A reserves and is not publically available.</p>	<p>Given that the subject land is not a City reserve the study is therefore irrelevant and reference should be removed.</p>	<p>Uphold Submission.</p> <p>Delete Part 2 Section 2.1 (pg. 13) paragraph 2.</p>
		<p>Reword Part 2 Section 2.1 (pg. 13) paragraph 3 to provide further clarity as follows:</p> <p><i>The City formally adopted the Geraldton Local Biodiversity Strategy in October 2013. The Strategy did not identify any significant vegetation on the land. There are areas in close proximity to the Structure Plan area that are identified as 'Areas of Conservation Value' (for retention and protection'). This includes a Local Ecological Link abutting Lot17 on the eastern boundary.</i></p>	<p>The wording suggested by the DPaW provides clarity of the assessment and context of the site in relation to the Local Biodiversity Strategy.</p>	<p>Uphold Submission.</p> <p>Modify Part 2 Section 2.4 (pg. 13) paragraph 3 as per the wording suggested by DPaW.</p>

City of Greater Geraldton – Lots 15 & 17 Brand Highway Structure Plan – Schedule of Submissions

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2 continued		<p>Plan 1 – Local Structure Plan Remove conservation from heading in the legend as this is not the proposed zoning but part of the public open space. Put underneath as per N and L.</p>	<p>As per the comments provided by DPaW, 'Conservation' is a public open space hierarchy and therefore it should be reflected accordingly on the legend.</p> <p>Furthermore, the area indicated in the north-eastern corner of Lot 17 as both 'conservation' and 'local' public open space should be amended to just 'conservation'.</p> <p>The conservation designation is requested due to the topography of the area which falls from 48AHD to 38AHD at the most corner point. The landform severely restricts the ability for the area to be developed and used as a local park.</p>	<p>Uphold submission.</p> <p>Modify Plan 1 – Local Structure Plan to remove 'Conservation' from the 'Parks, Recreation & Conservation' heading in the legend and insert 'C – Conservation' under the Public Open Space legend.</p> <p>Modify the Local Structure Plan and report to designate the public open space area indicated in the north-eastern corner of Lot 17 as just 'conservation'.</p>
		<p>Section 2.5 (pg. 5) of the Engineering Services Report contained in Appendix 5 outlines that bulk earthworks are proposed to strip and clear existing vegetation. However, Part 2 Section 3.5.2 (pg. 21) of the report and Section 2.2 of the Local Water Management Strategy contained in Appendix 4 includes a water conservation objective to retain 'native trees in POS where possible'.</p> <p>These statements are contradictory and the Department requests that the Engineering Services Report be modified to take into account vegetation being retained.</p>	<p>These statements are contradictory and the relevant technical appendices and the local structure plan report should be updated accordingly.</p>	<p>Uphold submission.</p> <p>Modify the local structure plan report and the relevant technical appendices in order to delete this anomaly.</p>

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3 (08-05-2017)	Main Roads WA (MRWA)	<p>No objection.</p> <p>The Transport Assessment needs to be revised to consider realistic growth projections for the LSP, in order to take account of future traffic volumes on Brand Highway when the subject area is fully developed.</p> <p>The SIDRA analysis assumed the year 2018 to represent the post-development scenario. It is considered by MRWA that the year 2018 is unrealistic to be representative of the post development scenario and the projected growth scenario for future traffic volumes/capacity analysis of the proposed intersections onto Brand Highway at full opening and post full development within any subsequent traffic assessment should be consistent with the <i>City of Greater Geraldton Integrated Transport Strategy</i>.</p> <p>The LSP is also to consider the Transport Assessments which have currently been completed in the surrounding lots form the existing urban boundary and Brand Highway upgrades.</p>	<p>As per MRWA comments, the Transport Assessment should provide a realistic volume projections to ensure that a robust investigation on the impact of the traffic generated from the proposed development has occurred.</p> <p>Clarification is also sort regarding the proposed short term bus routes depicted in Figure 9 of the Traffic Assessment Report.</p> <p>Furthermore, the proposed pedestrian and cyclist facilities shown in Figure 11 of the Traffic Assessment Report do not align with the Neighbourhood Connector roads depicted in Figure 5. As such, a review of the road hierarchy proposed across the LSP area should be undertaken to ensure that it is consistent with on-street upgrades.</p>	<p>Note submission.</p> <p>Uphold submission.</p> <p>Update Appendix 2 – Traffic Assessment Report to include;</p> <ul style="list-style-type: none"> • realistic transport projections in consultation with MRWA, • clarification on short term public transport (bus) routes; and • a review of the proposed road hierarchy. <p>Modify the Local Structure Plan, report and technical appendices as necessary to include this assessment and reflect any recommendations.</p>

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3 continued		<p>Lot 15 and 17 abuts Brand Highway to the west. The emission of transport noise and vibration could affect residential amenity for the future subdivided lots. To inform prospective landowners that these lots may be impacted by transport noise a requirement should be included in Part 1 Section 4 of the LSP that subject to detailed Transport Noise/Acoustic Assessment, noise sensitive development adjacent to an existing major transport corridor must implement noise amelioration measures for dwelling construction and include notifications of the certificates of title advising of transport noise impacts.</p>	<p>The subject lots are located adjacent to Brand Highway which is designated as a 'Primary Distributor' road and carries significant traffic volumes.</p> <p>State Planning Policy 5.4 Road and Rail Noise and Freight Considerations in Land Use Planning requires new noise sensitive development in the vicinity of existing major transport corridors to assess proposals for transport noise impacts. A noise assessment has not been submitted as part of this Local Structure Plan.</p> <p>A noise assessment undertaken as part of a Local Structure Plan can investigate the likely impacts of noise sources and can identify appropriate design responses and mitigation measures.</p> <p>It is therefore imperative that a noise assessment be undertaken prior to the approval of the Local Structure Plan to ensure that any potential negative impacts cause by traffic noise can be mitigated.</p> <p>Further assessment should still be requested prior to subdivision as per MRWA advice which is already included in Part 1 Section 6 of the LSP report. Wording of the section should be amended to make it clear that this additional information is required prior to subdivision.</p>	<p>Uphold submission in part.</p> <p>Undertake a Noise Assessment for the proposed LSP and include this assessment as a technical appendix.</p> <p>Modify the Local Structure Plan and report as necessary.</p> <p>Modify Part 1 Section 6 to state that this additional information is 'required prior to subdivision' and include any relevant subdivision conditions.</p>
		<p>Part 1 Section 4 – Subdivision and development requirements should also include that direct vehicle access onto Brand Highway except from the proposed intersections will not be permitted.</p>	<p>Part 1 Section 5 of the Local Structure Plan report requires that a Local Development Plan (LDP) be lodged for lots abutting Brand Highway. As part of this LDP access arrangements for these lots will be determined and restricted as necessary.</p>	<p>Dismiss submission.</p>

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3 continued		Part 1 Section 4 – subdivision and development requirements should also include that satisfactory arrangements being made with MRWA for the Brand Highway and proposed intersection to be designed and constructed in accordance with MRWA standards and process.	The design and construction of intersections onto Brand Highway in accordance with MRWA requirements does not need to be specifically highlighted in the Local Structure Plan given it is a standard requirement and will be conditioned accordingly at subdivision stage.	Dismiss submission.
		Part 1 Section 4 – subdivision and development requirements should also include that no stormwater drainage is to be discharged onto Brand Highway road reserve.	Restriction on the discharge of stormwater onto roads is a standard development requirement and it is not considered necessary to highlight at the structure planning stage.	Dismiss submission.
		Part 1 Section 4 – subdivision and development requirements should also include uniform fencing will be required for subdivided lots abutting Brand Highway road reserve.	Part 1 Section 5 of the Local Structure Plan report requires that a Local Development Plan (LDP) be lodged for lots abutting Brand Highway. As part of this LDP fencing requirements for these lots will be determined as necessary.	Dismiss submission.
		Part 1 Section 6 – Additional Information required at Subdivision Part 1 Section 6 states that a Transport Noise Assessment and Traffic Report at the subdivision stage would require consultation with the City of Greater Geraldton. MRWA request that this be amended to include MRWA as a stakeholder to be consulted when the Transport Noise Assessment and Traffic Report is required at the subdivision stage.	It is considered that consultation with MRWA in the completion of future transport related documents is necessary.	Uphold submission. Modify Part 1 Section 6 to include consultation with MRWA for the Transport Noise Assessment and the Traffic Report.
4 (09-05-2017)	Water Corporation (WC)	The subject land has been included within the WC's long term conceptual planning for the area. Currently, the infrastructure is remote from the structure plan area and outside of the WC's 5 year Capital Works Program. Therefore, any development may require prefunding of WC infrastructure given that planned capital works are outside of development timeframes.		Note submission.
		Water reticulation is available to the area. Water reticulation extensions off existing main can be accommodated to service a future proposal. More detailed water reticulation planning can take place closer to subdivision stage of development.		Note submission.

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4 continued		The principle followed by the WC for the funding of subdivision or development is one of user pays. The developer is expected to provide all water and sewerage reticulation if required. A contribution for Water, Sewerage, and Drainage headworks may also be required. In addition the developer may be required to fund new works or the upgrading of existing works and protection of all works. Any temporary works needed are required to be fully funded by the developer. The WC may also require land being ceded free of cost for works.		Note submission.
5 (11-05-2017)	Department of Aboriginal Affairs (DAA)	<p>There are no known Aboriginal heritage places with Lots 15 and 17. Therefore based on the information held by the DAA no approvals under <i>the Aboriginal Heritage Act 1972</i> are required.</p> <p>The DAA recommends the proponent takes into consideration the DAA's Aboriginal Heritage Due Diligence Guidelines when planning specific developments associated with development proposals</p>		Note submission.
6 (08-06-2017)	Department of Fire and Emergency Services (DFES)	<p>The south western boundaries of Lots 15 and 17 are both designated as bushfire prone pursuant to the <i>Fire and Emergency Services Act 1998</i> and identified on the <i>Map of Bush Fire Prone Areas</i>. As such, the provisions of <i>State Planning Policy 3.7 Planning in Bush Fire Prone Areas</i> and the <i>Guidelines for Planning in Bushfire Prone Areas</i> apply.</p> <p>In accordance with this, a BAL assessment is to be undertaken and where the BAL rating is above BAL-low, an assessment against the bushfire protection criteria will be required. This information can be provided in the form of a bushfire management plan.</p> <p>The draft structure plan proposes residential lots within the area designated as bushfire prone and as such should not be supported until such time that the bushfire risk and hazard reduction measures are established and understood.</p>	As per the Department's submission, Lots 15 and 17 are located within a bush fire prone area and therefore the Local Structure Plan is required to satisfy the requirements of State Planning Policy 3.7 and associated Guidelines.	<p>Uphold submission.</p> <p>Undertake a BAL assessment and other requirements in accordance with <i>SPP 3.7 Planning in Bush Fire Prone Areas</i> and the <i>Guidelines for Planning in Bushfire Prone Areas</i>.</p> <p>Modify the Structure Plan, report and technical appendices as necessary.</p>