

City of Greater Geraldton – Local Planning Scheme No. 5 (Greenough)
Karloo Local Structure Plan – Schedule of Submissions

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
1 (1/08/2014)	Private Landowner	<p>Object</p> <p>The public open space in the southern area should be similar to the northern area along the Seacrest Estate.</p> <p>Open space should be distributed evenly and there should be public open space fronting the area between Admiral Link and Verita Road.</p>	<p>A total of 15.55% of public open space has been proposed in strategic locations to offer recreational amenity and legible pedestrian connections to areas of desired destination. The locations of public open space have also been informed by the drainage characteristics of the land with provision provided in the low lying areas to ensure adequate drainage for the development.</p> <p>Admiral Link only has lots on one (western) side of the road and therefore there is the potential to utilise existing road infrastructure to cater for residential development. This situation does not exist in the north where the Seacrest Estate lots effectively back-onto the subject land.</p>	Dismiss Submission
		<p>We feel that by proposing residential in front of our property would decrease the value of our land.</p>	<p>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. 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.</p>	Dismiss Submission
2 (6/08/2014)	Private Landowner	Support		Note Submission
3 (5/08/2014)	Telstra	No Objection		Note Submission
4 (8/08/2014)	Department of Education	<p>No Objection</p> <p>The student yield generated from the proposed Local Structure Plan will be able to be accommodated at Rangeway Primary School, Mount Tarcoola Primary School and the future Utaarra South Primary School.</p>		Note Submission

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5 (8/08/2014)	Department of Parks and Wildlife	No comments on the application.		Note Submission
6 (11/08/2014)	Department of Aboriginal Affairs	Aboriginal Heritage is thoroughly discussed on page 44 of the document. There are no known Aboriginal Heritage reasons why the proposed structure plan could not go ahead.		Note Submission
		Recommended that the local structure plan include reference to the Cultural Heritage Due Diligence Guidelines so that prospective developers are informed of their obligations with regards to Aboriginal heritage.	Further information regarding Aboriginal places should be included in the relevant section of the report.	Uphold Submission In Part Two (section 2.12.1) of the report include reference to the Cultural Heritage Due Diligence Guidelines so that prospective developers are informed of their obligations with regards to Aboriginal heritage.
7 (18/08/2014) & (21/08/2014)	Mid West Ports	<p>The residential development proposed is unreasonably close to the GSTC and that reconsideration of aspects of this proposal is required to avoid future conflict.</p> <p>Our major concern is around acoustic impacts associated with the rail operations. The key points that we wish to draw to your attention to are:</p> <ol style="list-style-type: none"> 1. The assumptions in Appendix G of the Structure Plan are not correct in at least two respects: <ol style="list-style-type: none"> a. The number and timing of rail movement using the GSTC – the ultimate level of operations assumed at section 3.1.2 is below even current traffic levels. b. The assumptions about the classification of locomotives using the GSTC are wrong. 	<p>The number and timing of rail movements using the GSTC were derived from Main Roads WA for the GSTC project. The report can be updated if the data can be provided.</p> <p>The assumptions about the classification of locomotives using the GSTC were based on information received from Main Roads WA. The report can be updated if the data can be provided.</p>	<p>Uphold (in part) Submission</p> <p>Modify Appendix G (section 3.1.2) with any updated data that Mid West Ports can supply.</p>

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7 continued		2. There is the potential for significant growth of port traffic in the future. This may include duplication of parts or all of the rail line.	Noted, and in accordance with <i>State Planning Policy 5.4 – Road and Rail Transport Noise and Freight Considerations in Land Use Planning</i> , the onus is on the infrastructure provider to ensure that any new infrastructure is designed and constructed to an acceptable level of acoustic amenity for existing and new noise-sensitive developments.	Note Submission
		3. There are already issues associated with residences located in the vicinity of the GSTC and by positioning other new residences in immediate proximity the situation will be unnecessarily exacerbated.	An Acoustic Assessment (Appendix G) has been undertaken that details the measures required for the development to comply with <i>State Planning Policy 5.4</i> .	Note Submission
		4. The Structure Plan recommends the provision of 4.5m high noise walls adjacent to residences. The barriers may well be wise in any event but in conjunction with appropriate buffer spaces.	The Acoustic Assessment concludes that with the provision of a 4.5m high noise wall adjacent to residences the proposed development will comply with <i>State Planning Policy 5.4</i> . Two large public open space areas are proposed on either side of GSTC to provide additional buffer spaces.	Note Submission
		5. The layout for the residences has front yards facing the noise sources which is likely to promote conflict.	Under <i>State Planning Policy 5.4</i> there is a requirement to provide one outdoor living area with adequate acoustic amenity. This is readily achieved by dwellings fronting noise sources as the house acts as a barrier to the outdoor living areas at the rear of the lot.	Note Submission
		You will be aware that rail operations also have the potential to generate vibration impacts on nearby sensitive receptors.	<i>State Planning Policy 5.4</i> does not specifically address ground vibration, however some guidance is provided within the <i>Implementation Guidelines for State Planning Policy 5.4</i> . These guidelines state that ground borne vibration levels are relatively low at distances greater than 50m. Although the closest residential area is approximately 60m from the rail, an assessment of vibration impacts should be considered.	Uphold Submission Include in Part One (section 5.6) a requirement for a detailed vibration assessment at the time of subdivision.

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8 (19/08/2014)	Main Roads WA	<p>No Objection</p> <p>Request a reconsideration of the road positioning in one area. At the eastern end, to the north of the GSTC, the corner of an internal road runs very close to the GSTC itself. It would be better if this road ran parallel to the east-west neighbourhood connector to the north as it would reduce the risk of glare for drivers along the GSTC and would also remove the temptation for pedestrians or drivers to access the GSTC road reserve.</p>	<p>The alignment of the road is primarily based on the existing over-head powerlines and associated easement. Issues associated with potential glare and vehicular access can be resolved through appropriate barriers and screening, as would be necessary for noise buffering.</p> <p>Given the location of the road in the context of the overall development and surrounding land uses there are significant areas of desired destination across the GSTC. The instances of pedestrians trying to cross the GSTC are considered very low and there is access through the proposed POS to the formal bridge location that will cater for appropriate crossing movements.</p>	Dismiss Submission
		<p>While not a concern for Main Roads specifically, we would also question the design of the internal road running adjacent to the southern approach of the bridge over the GSTC. Having the road run adjacent may lead to people cutting across, and the dog leg in the road immediately to the south seems to be an unusual selection for the alignment.</p>	<p>There will be a significant grade difference between these two roadways which would largely eliminate direct connection.</p> <p>The dog leg alignment is to ensure sufficient intersection distance with the proposed round-about to the south.</p>	Note Submission
		<p>Matters that would need to be addressed at subdivision or detailed area planning stage are as follows:</p> <ul style="list-style-type: none"> No access would be permitted to the GSTC. Future details should set out means by which access to GSTC would be controlled – legally (notifications on certificate of title) and practically (e.g. fencing, where topography would allow access by pedestrian or vehicles). 	<p>All comments are noted and will be addressed at the appropriate stage of subdivision / development.</p>	Note Submission

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8 continued		<ul style="list-style-type: none"> The batters along the GSTC would have to be appropriately protected to ensure that they would be structurally sound and that they would restrict any unauthorised access. It is noted that land has been identified for earthworks in association with the bridge design and construction. Main Roads will continue their involvement in the development of the bridge design. Notifications in relation to impacts of noise and vibration due to the proximity of the road and rail transport corridors should be considered for placement on the certificates of title on lots that would be affected. All surface water would have to be managed within the site. None shall be discharged into the road reserve or Main Roads' drainage systems. 		
9 (14/08/2014)	Department of Health	<u>Water Supply and Wastewater Disposal:</u> Any proposed developments are required to connect to scheme water and reticulated sewerage in accordance with the draft <i>Country Sewerage Policy</i> .		Note Submission
		<u>Public Health Impacts:</u> Public Health Considerations should be addressed and incorporated into the local structure plan. You should also acknowledge the DOH's <i>Guidelines for Separation of Agricultural and Residential Land Use</i> as a means to help avoid conflict and potential adverse health effects and nuisance impacts from chemical use, dust and other rural pursuits from surrounding areas.	Through the design in accordance with <i>Liveable Neighbourhoods</i> , it is considered that the Structure Plan has adequately considered and addressed relevant public health impacts.	Note Submission

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9 continued		<p><u>Chronic Disease Prevention:</u> As outlined within key state planning policies such as <i>Directions 2031</i> and <i>Liveable Neighbourhoods</i>, to support the increased population growth expected within WA development should be designed around an activity centre network, an integrated movement network (supporting activity centres) and a green network.</p> <p>It would be encouraging to see the incorporation of these design principles, such as the mixed land use and increased density in the strategy and scheme concept and the incorporation of an integrated transport system to support the increased density.</p>	The design of the Structure Plan has been based on the principles of <i>Liveable Neighbourhoods</i> including a mixture of land uses, a variety of residential densities and provision of a well-connected public open space network.	Note Submission
10 (21/08/2014)	Private Landowner	<p>Object</p> <p>There is already enough land released in Geraldton for the Department of Housing to use (e.g. Alexander Heights and others).</p>	<p>The timing of the release of the land will be a decision made in the economic climate at that time. Forward structure planning for the site should be progressed to enable the timely release of land as demand warrants.</p> <p>There is no justification to delay structure planning in areas identified for development simply because development has not occurred in other areas.</p>	Dismiss Submission
		Rangeway is already seen as the 'Bronx' of town and many residents would like the area cleaned up as with the Department of Housing scheme brings a lot of undesirable people into the area.	There is no evidence to support the claim that the development will bring 'a lot of undesirable people into the area' and the comments are based on a personal view.	Dismiss Submission
11 (21/08/2014) & (17/09/2014)	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 LWMS being modified as per the actions detailed in a meeting with the Department and the proponent.	Note Submission

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11 continued		<p>The DoW requested the following amendments to the LWMS prior to approval being granted:</p> <ul style="list-style-type: none"> • Text should be added which clearly states the Verita Road sumps are existing and have been included as part of the pre-development environment. • LWMS should encourage the use of WSUD features such as gapped kerbs which discharge into long swales allowing diffuse distribution of overland flow flooding into POS areas (instead of pit and pipes) and street trees and the use of a median strip in industrial/commercial areas. • Provide the location of all infiltration testing undertaken to date across the site. • Include a criteria for infiltration testing in the location (and to the depth) of all proposed basins used to detain storm events over the first 15mm of rainfall across the site to be undertaken and presented in the UWMP. • Lot soakwells must be sized to retain the first 15mm of rainfall only. Additional text regarding any requirements for soakwells which the City has should also be included. • Results from Tables 9, 11 and 13 should make it clear that all water which flows out of these basins drains to the Verita Road sump where it is discharged to ground via infiltration. • DoW do not require a 1.2m separation distance from groundwater. Any reference to this should be removed from the LWMS. • Information regarding the availability of water from underlying aquifers for irrigation purposes should be included in the LWMS. • Information regarding how the development will be serviced for potable water and sewerage should be included within the LWMS. 	These modifications should be made the LWMS.	<p>Uphold Submission</p> <p>Modify the LWMS (Appendix N) in accordance with the actions detailed in the Cardno minutes from the meeting with the Department of Water on 4 September 2014.</p>

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12 (20/08/2014)	Water Corporation	<p>Does not object to this development in principle.</p> <p>Generally the servicing report in the structure plan has identified the majority of servicing requirements. Further advice was provided regarding:</p> <ul style="list-style-type: none"> • Wastewater Servicing. • Water Servicing – reticulation sizing and connection point. • Existing above ground steel transfer main 600 in diameter & 10m easement – Edward Road to Rangeway Tank – Protection of Service. • Existing transfer main 600AC, Bootenal Tank to Rangeway Tank – Protection of Service. • Existing Clematis St Wastewater Pump Station (wwps) Pressure main (PM) 300P – Protection of Service. • New 600S Proposed Duplication of existing 600AC 600 Bootenal to Ackland St and New 600 Ackland to Abraham. • Road / Service Crossing – Protection of Services and the Utility Provider Code of Practice. 	<p>The Water Corporation provided detailed servicing advice with regard to the future subdivision of the land.</p> <p>Both the City and the Department of Housing have been closely liaising with the Water Corporation regarding servicing requirements.</p>	Note Submission
13 (1/08/2014)	Department of Agriculture and Food	No objection as the lots have already been zoned as 'Development'.		Note Submission
14 (20/08/2014)	State Heritage Office	No comment as it does not appear to impact on any places of State cultural heritage significance.		Note Submission
15 (22/08/2014)	Western Power	<p>Supports identification of the 20m registered easement over the existing 132 kV line.</p> <p>Public open space and other non-intensive land use as proposed adjoining the easement corridor is supported.</p> <p>Further advice was provided regarding the power network.</p>	<p>Western Power provided detailed servicing advice with regard to the future subdivision of the land.</p> <p>Both the City and the Department of Housing have been closely liaising with Western Power regarding servicing requirements.</p>	Note Submission

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16 (3/09/2014)	Public Transport Authority	<p>The Structure Plan addresses a large residential development bisected by the transport corridor which includes the busy freight rail line into the Port. New development next to railway is not ideal as it invariably raises many issues for both the users of the rail and the residential homeowners.</p> <p>It is encouraging to see the Structure Plan details noise mitigation measures including development being at least 50 metres from rail and noise walls. PTA would certainly not recommend allowing residential development any closer than 50 metres from the transport corridor boundaries (as opposed to the track centreline).</p>	The Structure Plan has addressed the requirements of <i>State Planning Policy 5.4</i> .	Note Submission
		<p>PTA reiterates the following measures to minimise the impact of rail for the adjoining residential development:</p> <ul style="list-style-type: none"> • Noise abatement measures by the developers/builders/occupants in accordance with SPP 5.4. • Section 70A Notifications on new Certificate of Titles when the land is subdivided (although PTA will request this when comment sought from WAPC during subdivision process and if considered necessary). • Noise wall or brick boundary wall to be constructed to a minimum height of 1.8 metres by the developer and later maintained by the developer or Local Authority. • No stormwater runoff into the rail corridor, all water must be contained on the subject site • No access into the rail corridor. • No new level crossing will be permitted, that is all newly constructed lots must have public (and constructed) road access. 	All comments are noted and will be addressed at the appropriate stage of subdivision / development.	Note Submission

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17 (15/08/2014)	Private Landowner	<p>Object</p> <p>We are investors and the value of our properties have fallen in the last 12 months primarily as a result of too much land being released and developed.</p> <p>Population is not increasing as hoped so it is irresponsible to release more lots which will impact on the economy of Geraldton.</p>	<p>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. 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.</p> <p>The timing of the release of the land will be a decision made in the economic climate at that time. Forward structure planning for the site should be progressed to enable the timely release of land as demand warrants.</p> <p>There is no justification to delay structure planning in areas identified for development simply because development has not occurred in other areas.</p>	Dismiss Submission
18 (18/09/2014)	Iluka	<p>Generally the impact to Iluka is expected to be minimal. The industrial estate buffer zone has been adhered to with the only section transected by the buffer changed to highway commercial use (a low sensitivity land use).</p> <p>Iluka's concern would relate to a potential restart of NSR. Properties to the south will have clear view of Iluka's site and in particular exhaust stacks hence increasing the number of overall observers. Although we note this is not dissimilar to Seacrest and drivers on the GSTC. Given Iluka's location close the Meru tip and other industrial neighbours it may result in complaints that are not a direct result of Iluka's operation.</p>	<p>Whilst the concern is noted, it has to be expected that future residents would be fully aware of the Iluka infrastructure (exhaust stacks) especially given their visual prominence in the landscape.</p>	<p>Note Submission</p> <p>Note Submission</p>