

Local Planning Strategy & Scheme Summary of Submissions Local Profile Papers

Background

At the 13 April 2017 Ordinary Council Meeting, a project plan was endorsed to undertake preparation of the new local planning scheme and local planning strategy. These documents will help take our community down the path we need to travel towards the year 2036.

As part of that decision a notification of this intent was advertised in the local newspaper and provided to the relevant government agencies and the adjacent local governments.

The next step started the formulation process of the strategy, by engaging with our community on the kinds of key issues that will be important. To this end a series of local profile key issues papers were prepared about the key issues that the City's new local planning strategy and scheme ought to focus on addressing. Council resolved to advertise these local profile key issues papers for comment which is in addition to the ordinary advertising process which comes much later when the draft documents have been drafted.

The purpose of this report is to summarise the feedback received during this 'preliminary' consultation which started in early December 2017 and concluded at the end of March 2018

Who lodged a submission?

A total of 21 submissions were received:

- 12 from community members/groups; and
- 9 from government agencies.

What did the submissions say?

The key matters raised in the consultation were as follows:

- Concern about including policy statements
- Concern about potential conflict between the papers
- Concern about obstructing the WAPC's process for Planning Investigation Areas

 Need for strategic direction to be provided by the State government (through Perth and Peel @3.5million which was released in the closing week of this consultation)

Submissions queried whether some inclusions in the papers were stepping too far ahead from the issue and its planning implications and seeking to provide resolutions and policy statements.

The matter of whether there was a potential conflict between some papers was raised as well as the concern that the papers would somehow obstruct the rights of the State government to carry out their 'Planning Investigations' in the areas indicated in Perth and Peel @3.5 million.

The detailed submissions can be found in Attachment One.

What happens next?

We now enter Phase 2 as shown in the figure overleaf. We'll focus discussions on the key issues affecting our City and together continue Planning Cockburn.

The draft local profile papers will need updating to reflect matters which may have evolved in the past few months, such as Perth and Peel @3.5 million and the suspension of the Strategic Assessment of the Perth and Peel Region, to name only two.

Each paper will be reviewed to ensure:

- Removal of any policy statements
- Resolution of any conflicts between other papers
- Highlighting of matters where there may be an implication for any of the 'Planning Investigation Areas' and acknowledge these are to only be a statement of fact, and not taken as obstructing the WAPC to carry out its investigation of the areas involved.

Then we'll build on the community discussion to date, with our key issues in mind, talk about our strategic goals, aspirations and plans for future growth and prosperity.



Planning Cockburn Our City 2036



Local Planning Strategy and Scheme

Phase One (Oct 2017 - April 2018)

Community engagement to shape key issues papers

Why? Identify important issues for the Local Planning Strategy and Scheme

How? Community engagement to shape the key issue papers. **Community engagement?** Online engagement and direct discussion with key stakeholders and community groups.

Phase Two (May - Dec 2018)

Strategy preparation

Why? Set strategic goals, aspirations and plans for future growth and prosperity.

How? Respond to key issues shaped by the community. **Community engagement?** Targeted focus groups with landowners:

- 1) Australian Marine Complex / Henderson
- 2) Rural zone (Henderson and Wattleup)
- 3) Rural Living zone (Beeliar)
- 4) Resource zone (Banjup)
- 5) Resource zone planning investigation area (Treeby and Jandakot)
- 6) Munster (land within buffer)

Phase Three (1st half 2019)

Scheme preparation

Why? Set the statutory framework to implement the Draft Strategy. **How?** Apply a planned set of zones, reserves, land use permissibility and development standards which form the basis of regulating land use and development to achieve the intent of the Draft Strategy.

Community engagement? Detailed engagement on draft strategy and scheme, providing the opportunity for the community to consider the framework of the new Scheme

Phase Four (2020)

Finalisation of drafts

Why? Complete the project and put in to action the plans for future growth and prosperity.

How? Successfully engaging with the community and progressing through Phases 1 to 3.

Community engagement? Detailed engagement on the draft strategy and scheme, once the Minister has granted consent to advertise these documents and community groups

NO.	NAME/ADDRESS	SUBMISSION
1	Tourism WA	Tourism Western Australia on behalf of the Department of Jobs,
		Tourism, Science and Innovation would like to thank you for making us aware that this process is now underway within the City. At this time we have no additional comments to make.
2	Department of Transport Policy Planning and Investment 140 William Street, Perth WA 6000	No Comments.
3	Department of Biodiversity Conservation and Attractions	No Comments.
4	Janelle Ricciardi A/Strategic Railway Network Planner IP&LS	I refer to your letter dated 6 February 2018 seeking comments regarding the Local Profile Papers for Land Planning Strategy. The PTA, in consultation with Arc Infrastructure, reviewed the documentation and makes the following comments - • the rail freight corridor is not to be impacted • the PTA is supportive of Bus Rapid Transit/Light Rail • Transperth advised that the bus information within the Traffic and Transport Profile is accurate
5	Fremantle Ports	Thank you for inviting our feedback on the City's Local Profile Papers. Our comments are directed at the Fremantle Outer Harbour section within the Traffic and Transport paper where some inaccuracies have been identified. Critically the State Government's Westport planning process is leading the port planning which will culminate in providing the strategic direction for the Port of Fremantle's Inner and Outer Harbours. The City's Local Profile Paper makes no reference to the Westport project. To ensure the correct information is used as part of your planning process it is suggested that the Local Profile Paper be amended to reflect the aims and objectives of the State Government's Westport project. There is much public information on this project. The statement that "Fremantle is now a third or fourth tier port as it has been deemed too shallow for modern shipping" is incorrect and misleading (page 361 of 587). The Inner Harbour of the Port of Fremantle is part of the national network of container and general cargo ports. Ships travelling to Australia from hub ports such as Singapore, Shanghai and Rotterdam generally exchange cargo at Fremantle, Melbourne, Sydney and Brisbane ports. These ports have similar depths and vessel handling capabilities. To ensure the Inner Harbour at Fremantle has adequate depth and may continue to take its place in the national network of ports the harbour has been significantly dredged. As the only dedicated west coast container port it is imperative for economic reasons that

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		Fremantle continues to take its place equally alongside other Australian ports.
		The statement that Fremantle "cannot accept the length of trains (2km) now common in first and second tier ports; and cannot accept double stacked container rolling stock" also requires some qualification. Trains in excess of 1.0 kilometre more commonly serve the intra and interstate freight rail network. The freight rail terminal at the Inner Harbour has been extended since its initial construction in the early 2000s and accommodates trains of 650 metres. This is consistent with the planning for the freight rail network external to the port; the metropolitan freight rail network does not generally cater for longer trains more commonly associated with the intra and interstate networks.
		The limitations on double stacked freight rail are generally external to the port. For example traffic bridges over rail throughout the metropolitan region. Moreover there needs to be a demand for double stacking. Length of freight rail and double stacking are complex matters requiring understanding of freight rail operations across the network and the economics of rail.
		The statement that " there is a whole of government position at State and Federal levels that the Fremantle inner harbour will not grow any more" is incorrect. The Government has initiated the Westport project to determine and plan for future port facilities to serve the needs of the metropolitan area including the role of existing facilities at Fremantle, new facilities in the Outer Harbour and the role of Bunbury. Whilst the State Government has signalled its intention to cap the freight capacity of Fremantle Port, this was following the opening of any new facilities in the Outer Harbour. This matter will now be investigated as part of the Westport work as part of the timetable and transferring to the Outer Harbour.
		Port facilities are significant land uses. In this regard the City's endeavour to include port planning at the local government level is appropriate. However, to ensure the correct information is conveyed it is requested that the Local Profile Paper be amended to reflect the State Government's Westport planning project and the inaccuracies adjusted.
6	Freight and Logistics Council PO Box 941, South Fremantle WA 6162	The Freight and Logistics Council of Western Australia Inc (FLCWA) comprises senior decision makers from industry and Government with the purpose of providing independent policy advice to the Minister for Transport on issues impacting the provision of freight and logistics services in this State.
		A number of the issues of concern to FLCWA are of relevance to the City of Cockburn. They include port development, protection of freight activities and the provision of effective logistics services.

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		Given this association, FLCWA welcomes the opportunity to make some general comments in the context of the City's current planning exercise.
		Congestion and encroachment are two of the main challenges facing the freight and logistics sector in providing cost-effective and efficient services to industry and the broader community. Each should be to the forefront of the City's thinking as it develops future planning strategies given the vital role played by freight in the wellbeing of the State's economy and its people.
		Central to the discussion on congestion would be the development of transit oriented residential and employment opportunities to reduce pressure on the road network. FLCWA has a view that it puts to the Government that much road congestion is wrongly portrayed as the result of truck activity, when in actual fact, the root cause is the growing number of private motor vehicles on our roads.
		Planning strategies that are mindful of road congestion are supported by FLCWA. The point should be made, however, that notwithstanding such strategies, freight movements will continue to increase with population growth and Government policies such as urban infill. Additional freight activity will certainly be felt in and around the City of Cockburn. The protection of freight corridors from encroachment is essential in the face of this circumstance, not only to protect industry, but also the surrounding community.
		In the short to medium term, a particular focus for the City of Cockburn should be on the protection of the rail freight corridor from encroachment by inappropriate land uses as train activity increases from the relatively low levels experienced at present. FLCWA continues to put considerable effort into advocating to the Government for stronger State land use planning policies in this respect and is mindful of the recent associated initiatives being progressed by the City of Cockburn that are most welcome.
		Longer term, there are likely to be new port facilities further south in the Fremantle Outer Harbour. The City of Cockburn will have an important role in their development, not only in the protection of key corridors such as Rowley Road, but also in the provision of strategic industrial land to support the new port facilities.
		Thank you for the opportunity to participate in your current planning exercise on behalf of the freight and logistics sector. FLCWA would be pleased to continue the discussion as you require and is available to do so at your convenience.
7	Western Power 363 Wellington Street Perth WA	Thank you for your Notification intent to carry out work, received recently.
	6000	A Danger Zone, Registered Easement, Restriction Zone or

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		Minimum approach distance represent areas of high risk when building or working near the Western Power network. Before commencing any work it is essential that you complete a Dial Before You Dig enquiry to obtain the location and voltage of the Western Power network.
		Areas of high risk include; • Danger Zone – Defined by regulation 3.64 of the Occupational Safety and Health Regulations 1996 • Registered Easement - Western Power easements are registered on the Certificate of Title for the property. Easements and conditions are available from Landgate (www.landgate.wa.gov.au) • Restriction Zone – These are applied in the absence of a registered easement and are calculated in line with the Australian Standard for overhead line design (AS/NZS 7000:2010) • Minimum approach distance
		It is recommended that persons planning to build or undertake works in high risk areas near transmission or communication assets (including those listed above) act in a safe manner at all times and in accordance with all applicable legal and safety requirements (including the 'duty of care' under the laws of negligence, Worksafe requirements and guidelines, Australian Standards and Western Power policies and procedures).
		Western Power provides services that may assist persons planning to build or work within high risk areas near transmission or communication assets (refer to your Dial Before You Dig enquiry for location and voltage). These services can be found by visiting the Transmission and communication assets section of the Western Power website (https://www.westernpower.com.au/safety-access/working-near-our-network/).
8	Department of Water and Environmental Regulation	Thank you for referring the Local Profile Papers for a new Local Planning Strategy and Local Planning Scheme within the City of Cockburn received 6 February 2018. The Department of Water and Environmental Regulation (DWER) has reviewed the "Water Management" and "Rural Land Use Subdivision and Development" papers and comments are addressed in Attachment 1. Water Resource Advice Only The Department of Water has recently merged with the Department of Environment Regulation and Office of the Environmental Protection Authority to create the new agency Department of Water and Environmental Regulation. The former agencies are in the process of amalgamating their functions. Until this fully occurs, please note that the advice in this correspondence pertains only to water resource matters previously dealt with by the Department of Water.
9	Department of Fire and Emergency Services	DFES provide the following comments with regard to State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7) and the Guidelines for Planning in Bushfire Prone Areas

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This assessment is used to help the local government areas for land use intensification in accordance with and/or rationalise legacy areas previously identified intensification, but that are yet to be developed. The documents will be prepared through Bushfire Asset Assessment (BHL) for oareas identified, or being considered for land usen these are proposed DIAs, and/or oareas identified in a current strategy or zoned in scheme, but that are not yet developed — these are Assessment against the bushfire protection criticitientification of areas of non-compliance. Spatial representation of the measures necessatim improve compliance with the bushfire protection of Comparison of assessed areas and recommental appropriateness of areas for intensification of land. 2. Bushfire Assessment 2 This assessment identifies measures that could be	There are two types of bushfire assessment that may be relevant to the City's local planning strategy which will satisfy the minimum requirements of SPP3.7:
areas for land use intensification in accordance will and/or rationalise legacy areas previously identified intensification, but that are yet to be developed. The documents will be prepared through Bushfire Asset Assets	1. Bushfire Assessment 1
This assessment identifies measures that could be	o areas identified in a current strategy or zoned in the current scheme, but that are not yet developed – these are legacy DIAs. Assessment against the bushfire protection criteria and
	2. Bushfire Assessment 2
medium or extreme bushfire risk. The local govern generally be aware of the bushfire risk in their juris undertake Bushfire Assessment 2 as required, in SPP3.7. Further advice can be sought from the De Planning, Lands and Heritage (Bushfire Policy tea Department of Fire and Emergency Services, if re following documents will be prepared through Bus Assessment 2: ☐ Identification of areas for consideration. Not ne a BHL assessment as a local government may be	This assessment identifies measures that could be undertaken to reduce or better manage existing developed areas that have a medium or extreme bushfire risk. The local government would generally be aware of the bushfire risk in their jurisdiction and can undertake Bushfire Assessment 2 as required, in accordance with SPP3.7. Further advice can be sought from the Department of Planning, Lands and Heritage (Bushfire Policy team) and/or the Department of Fire and Emergency Services, if required. The following documents will be prepared through Bushfire Assessment 2: ☐ Identification of areas for consideration. Not necessarily through a BHL assessment as a local government may be already aware of the areas they would like to consider – these are existing DIAs.

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		identification of areas of non-compliance. Spatial representation of the measures necessary to improve compliance with the bushfire protection criteria. This may include improved vehicular access and egress, increased hazard separation, improved water infrastructure, implementation of fire management strategies, and vegetation management.
		3. Bushfire Hazard Level (BHL) assessment
		A BHL assessment should be prepared for 'proposed' and 'legacy' DIAs, with 'existing' DIAs possibly being exempt, using the methodology in Appendix Two of the Guidelines for Planning in Bushfire Prone Areas.
		4. Assessment against the bushfire protection criteria
		The assessment for each DIA should address the following elements.
		Element 1: Location ☐ Consider the landscape context of the proposal, including the type and extent of vegetation, topography (particularly land with slopes of >10 degrees), areas of possible fire-runs, and evacuation options.
		☐ Identify areas that represent an extreme bushfire risk that cannot be managed and should not be supported for development. ☐ Identify areas most suitable for land use intensification where the bushfire hazard is low or moderate on completion.
		Identify conservation areas including threatened ecological communities (TEC), Bush Forever, nature reserves or national parks that may constrain the clearing of vegetation to manage or reduce the BAL rating.
		Element 2: Siting and design ☐ Apply appropriate density codes (or lot sizes) large enough to accommodate asset protection zones (APZs) if required. ☐ Identify interfaces between proposed development and bushfire prone vegetation (hazard separation) to achieve an appropriate BAL rating (in accordance with AS3959). ☐ Identify areas that would require clearing to achieve an
		appropriate BAL rating.
		Element 3: Vehicular access Identify existing vehicular access routes that provide safe access and egress to two different destinations at a local and a broader district level. Identify requirements for additional vehicular access.
		☐ Identify opportunities to improve access and egress for existing development including incorporating emergency access ways and fire service access routes where no alternative exists.
		Element 4: Water In reticulated areas, highlight locations of hydrants and existing

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		water infrastructure.
		\square In non-reticulated areas, it will be necessary to demonstrate the availability of alternative water supplies for firefighting purposes.
		5. Spatial representation of bushfire protection criteria
		At this stage of the planning process it is important that the work undertaken to determine the bushfire hazard, and the measures required to comply with the bushfire protection criteria are connected spatially with the DIAs. This spatial representation (map) should provide a snapshot of the bushfire risk management measures for each of the DIAs (as identified in the assessment against the bushfire protection criteria). 6. Comparison of assessed areas and recommendations
		To help the decision-makers evaluate the appropriateness of areas for intensification of land use, the bushfire assessment should provide a comparison of each of the areas. The comparison can be presented as a matrix and should capture: the BHL assessment the assessment against the bushfire protection criteria which measures would need to be undertaken to comply with the criteria whether the site is likely, unlikely or will possibly meet the bushfire protection criteria.
		The decision-makers' recommendations for the land should reflect this comparison in determining the suitability of the proposed DIAs for land use intensification. It should be noted that bushfire is one consideration in a final recommendation and ultimately, the decision-makers may need to consider broader land use planning issues.
		Recommendation – advice only I trust the above advice assists the City in identifying the bushfire issues and how (or if) a bushfire assessment is necessary to inform the preparation of the strategy pursuant to SPP 3.7.
10	Landowner/Resident	 1. Please provide your comments below on 'Physical features and natural resource management' Streetscapes provide a great opportunity to provide green corridors for native birds, as well as shade and amenity, particularly when streets are near natural areas. Council could consider a Verge Conversion programme to assist residents to contribute to this, i.e. offer services of council bobcat to clear verges of weeds and grass to enable planting of suitable low growing native bushes. These would require less water and provide food and habitat for birds and fauna. While grass looks pleasant it is a burden on our limited water supply and the grassed verges do not serve a practical function. Great to see that sand and limestone extraction and management is being considered especially in the context of approaching 'peak limestone' in the metro area.

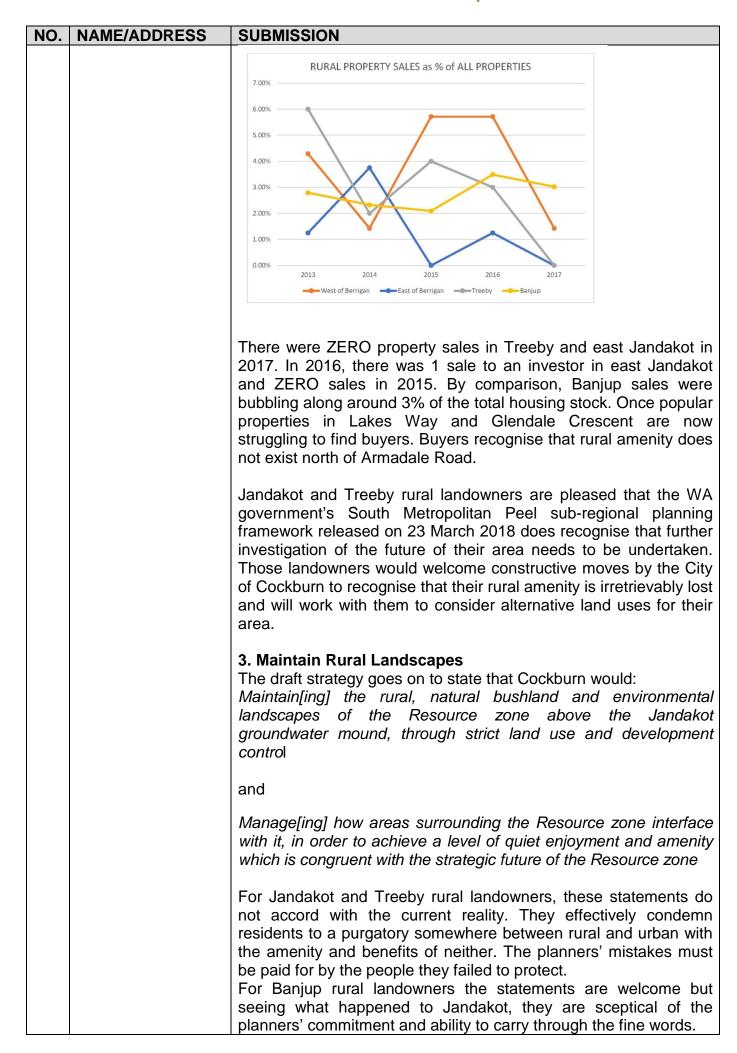
NO.	NAME/ADDRESS	SUBMISSION
		2. Please provide your comments below on 'Water management'
		• Water extraction licences are not an indicator of sustainable water use. The Department of Water is reviewing licence allocations; how is the Council preparing for the probable reduction in its licences for extraction? • Whilst the ICLEI targets are a great
		start, they do not match the decline in rainfall, expansion of built areas or extraction for amenity sites. What is the Council doing to facilitate uptake of the ICLEI targets at a domestic and industrial scale, as these efforts are not obvious.
		3. Please provide your comment below on 'Population and housing'
		The largest increase in population age groups is likely to be 5-9 year olds so provision of suitable nature play and nature education spaces are essential
		• Density targets in some areas will result in more houses on smaller blocks = less tree cover natural areas close to housing estates are very important to protect real estate values and provide a healthy lifestyle for residents. • Moving Around- Public transport is linked to population and demand, which take time and resources to develop, and State government action to implement. A local, 'quick win' solution for Cockburn is to build more active transport into its planning and development (i.,e. cycling lanes, dedicated dual use paths, bike secure storage at destinations such as shopping centres).
		4. Please provide your comments below on 'Economy and employment'
		The City could consider supporting "business incubators" in
		community hubs to increase the activation and growth of local business development to support local employment opportunities.
		5. Please provide your comments below on 'Retail and commerce'
		The strategies for growth of lower-level, smaller commercial centres driven by population expansion will require careful
		planning to ensure these centres are "people friendly" and not primarily designed around parking spaces. In established areas where the City has been progressing Revitalisation Strategies which have increased residential densities within proximity of
		activity centres, including smaller centres, the City needs to inject finances from the income derived from increased densities into upgrading lower level, small commercial centres. The planning of these upgrades needs to be undertaken in a consultative manner with input from residents using those centres.
		6. Please provide your comments below on 'Tourism and visitors'
		Let's build the only east-west biodiversity corridor with an awesome pedestrian and cycle path between the ocean and the Lakes in the metropolitan area! Provide visitors to Cockburn an

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		 experience other than shopping and cafes. Ridgelines must absolutely be protected from housing and road development. The ridges in Cockburn are some of the few remaining in the metropolitan area and are a real asset. Security at coastal parking areas is a concern, with many reports of cars being vandalized and broken into. What will be done to address security concerns?
		 7. Please provide your comments below on 'Recreation and open space' The council needs to clarify what's the goal for provision of POS and recreation areas? Is it to have some type of POS within a 5 or 10 minute walk from most residential areas? Is it to place POS and recreation areas, especially sporting, within a certain distance of community hubs (ideally to either reduce the amount of car trips or to enable drivers to do more with the trip such as go to shops after they drop the kids off at footy practice). A hierarchy for provision of POS services might be needed.
		8. Please provide your comments below on 'Community facilities' • Strategies to ensure that older suburbs where "revitalisation" strategies occur include community hubs not just increased housing densities are not included in this document
		 9. Please provide your comments below on 'Cultural heritage, urban design and heritage' • This document does not make mention of the removal of Roe 8 & 9 from the MRS and opportunities available for better urban design on land that is rezoned. • Aboriginal heritage of areas not listed by DIA e.g land adjacent to Dixon Park that was an Aboriginal camp site. Strategy to identify these areas and provide interpretation and preservation.
		10. Please provide your comments below on 'Rural land use, subdivision and development' No Answer
		 11. Please provide your comments below on 'Traffic and transport' This document does not make mention of the removal of Roe 8 & 9 from the MRS and opportunities available for cycling and walking paths using land that is rezoned
		12. Please provide your comments below on 'Infrastructure services' It would be useful for the city to develop a plan for using the current sumps that exist in older areas of Cockburn. The sumps are currently fenced off areas that need to be maintained by Council staff. An investigation into how to improve them and make them useful environmental habitat as well as more aesthetically pleasing is needed. The upkeep of these areas could be good community projects.

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		 13. Please provide your comments below on 'Opportunities and constraints upon development' The key here - how development will be designed such that it leaves a positive and memorable visual appearance on the landscape. For many residents, development has not been visually appealing (perhaps memorable in some cases because of the extreme unattractiveness). 14. Any other comments No Answer
11	Banjup Residents Group	14. Any other comments Cockburn put these important matters out for public comment over the annual Christmas and holiday season and with no community briefings or much publicity. To prevent this becoming another flawed consultation, the Banjup Residents Group requests that Cockburn rethinks how it will obtain informed community feedback.
		Rural land use, subdivision and development Submission by Banjup Residents Group (Inc) Overview There is a disconnect between the words in the draft local strategy and what Cockburn planners have invoked or supported over the past 5 years in the "Resource Zone", much of which has now been reclassified as a "Development Zone". Further, much of the draft strategy is inconsistent and unclear and cannot be supported by the Resource zone landowners. However, our submission does propose a constructive way forward. The main points we make are: • Recent zoning and planning approvals for Calleya, DoH, Treeby, and Schaffer that are all on the Jandakot Water Mound make it clear that the 2 hectare block size is just one of the controls and not the key determinant • Rural Jandakot and Treeby are no longer "highly valued". In their quest for "strategic land use", state and local planners have neglected to preserve the area's rural amenity. Property sales there have fallen to zero in the past 3 years as potential buyers look to Banjup for their rural escapes. Land owners in Jandakot and Treeby are now in a planning purgatory, somewhere between rural and urban with the amenity and benefits of neither. That problem has been recognised in the recently released South Metropolitan Peel sub-regional planning framework. • Council's submission to Perth@3.5million called into question the viability of Jandakot and Treeby as rural areas given the surrounding pressures from the Airport and urban developments. However, Cockburn's planners want to overturn Council's decision and deny that rural amenity has

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		 been lost. In the light of the South Metropolitan Peel subregional planning framework that position needs to be reconsidered constructively. In June 2015, Council recognised Liddelow Road in Banjup as a local road and voted for traffic calming measures along its length. Again, though, Cockburn's planners want to overturn Council's decision and to "upgrade" Liddelow Road for "higher order functions". Upgrading Liddelow Road will have the same disastrous effect on Banjup as the increased use and duplication of Jandakot Road has had on the rural amenity of Jandakot and Treeby. Banjup residents request Council, in partnership with local landowners, to develop and implement specific planning and operational policies that protect, preserve, and enhance the rural amenity of Banjup
		1. Rural Water Protection The BRG fully supports the objectives of State Planning Policy 2.3 (Jandakot Groundwater Protection) to protect the drinking water resource. However, the urban developments of Atwell, Aubin Grove, Honeywood, Calleya, the Department of Housing project, and the Schaffer / Urban Stone land use change clearly demonstrate that the drinking water resource can be protected. We understand that the Department of Water ideally would prefer no development on the Jandakot Water Mound but if the WAPC cites strategic reasons for development, then the DoW will acquiesce, provided that protective measures are put in place, such as deep sewerage and oil traps in road drains. The draft strategy states that: development of a single house on a single lot of minimum 2ha in size is the key land use and development control for this area
		There are about 600 rural lots in the P2 area of the current Resource Zone. The 2,000 lots in Calleya by the stroke of a pen have been moved from area P2 to P3. A further 2,000 lots will follow, according to the Treeby District Structure Plan. Further, the 622 hectares of Jandakot Airport and its commercial developments, all under Commonwealth control, lie atop the Water Mound. It is misleading to say that the 600 2 hectare single lots are the key land use and development control over the Jandakot Water Mound. Proximity of the area to businesses, employment, shops, and transport seem to be the key determinants. Recent recommendations by officers (Jandakot/Treeby Vision, 367 Jandakot Road) cite SPP 2.3 to block inconvenient proposals. It is quite clear that adjoining developments (Calleya, DoH, Schaffer) can satisfy the Department of Water's groundwater protection requirements. Cockburn officers' contra arguments are inconsistent. The rural local planning strategy should be far more realistic. 2. Highly Valued Area
		The draft strategy states that:

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		The City's rural areas are highly valued, and under continued pressure as growth occurs throughout the broader Perth Metropolitan Region. At first glance, this statement seems obvious. However, it begs these questions: • What makes an area rural? • Who values them? • What are the pressures from the surrounding growth?
		Certainly, Banjup, Jandakot, and Treeby met many people's understanding of 'rural' when the areas were subdivided nearly 40 years ago. Many of the original purchasers of the new lots still live in the houses that they built there. What brought them to the areas were: • Peace and quiet • Woodland and pasture • Wildlife • Protection against encroachment (the original intention of SPP2.3)
		Sadly, planning decisions made since 2012 have eroded all these criteria. Jandakot and Treeby rural areas are been squeezed on all sides. The Airport is now a big commercial and industrial park directly abutting rural landowners' back fences, including a huge, 24/7, depot for Western Power. More large developments there will be completed within 5 years. The old sand quarries are now dense suburban housing, with many more houses to come. Populations there will climb from zero in 2015 to 15,000 or more by 2025. Adjoining developments in Piara Waters and Harrisdale add their own pressures on Jandakot and Treeby rural amenity. Jandakot Road will soon be a 4 lane highway carrying 30,000 vehicles daily. Developers are applying for additional uses for large land holdings in the area, adding further to pressures on rural residents. Planners at state and local governments have forgotten the rural residents of Jandakot and Treeby in their quest for more strategically sited housing and commercial development lands. The planners have failed to protect the rural landowners from the effects of urban development decisions. Cockburn's planners now state that the rural areas are "highly valued". They have not valued them highly enough over the past 6 years to afford Jandakot and Treeby the slightest protection. While the casual visitor might think it nice to be able live amongst the trees of Jandakot and Treeby, the reality is that few want to buy rural properties in the area. Those that do are typically investors hoping for a development opportunity. Few buy in Jandakot and Treeby seeking a rural lifestyle. As discerning outsiders, they recognise that the area's rural amenity is irretrievably lost. State and Cockburn planners should too. Recent property sales data for Jandakot, Treeby, and Banjup demonstrate the point. For now, Banjup is much less impacted by urban pressures:



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		4. Airport The draft strategy further states that Cockburn would: Ensure[ing] that development of the Jandakot airport precinct respects the presence of the Resource zone, and its strategic intent for bushland and environmental values to prevail
		This is unachievable. The state of Western Australia has no control over the development of Jandakot Airport, let alone the City of Cockburn, as it well knows. The Airport recently cleared 50 hectares of prime bushland abutting Jandakot rural properties and Cockburn did nothing and said nothing about it. Some emotional publicity about the destroyed environment at the airport might have caused Jandakot Holdings to have left a 50 or 100 metre buffer.
		The draft strategy further states that Cockburn would: Prevent[ing] any further sand mining activities within the Resource zone, that destroy the elevated bushland sand ridges that run through the area This statement is welcome but, again, Cockburn is over-reaching. The City cannot "prevent". If the EPA approves and the Minister and the courts agree, then Cockburn must acquiesce. Also, the phrasing of the statement is odd. Does Cockburn imply that sand mining that does not destroy sand ridges would be acceptable? We note that an application was made last year to reopen an existing sand mine at Warton and Jandakot Roads. If this just makes the existing holes deeper, would Cockburn support the mining application?
		The draft strategy is silent on what should happen to the existing, non-producing, sand mines? Will they remain as blots on our "highly valued" rural areas, as has been the case for decades? Will Cockburn insist that the be rehabilitated promptly? Or are the derelict sites to wait until a property developer makes an offer to the City too good to refuse?
		6. Sub-Division Cockburn's intent is unclear when the draft strategy states: Preventing any further subdivision within either the Resource zone or the Rural zone. Subdivision within the Resource zone causes fragmentation of the natural environment, with the likes of driveway, firebreak, building envelopes and bushfire requirements are considered. This impact of the natural environment, and the extensive network of wetlands that exist, directly threatens the Jandakot groundwater mound and further introduces pressure for development to occur
		If Cockburn is referring to subdivision for urban use, then Jandakot and Treeby rural landowners cannot support the strategy because, as already stated, it condemns them to their planning purgatory. If Cockburn is referring only to lots of land greater than 4 hectares in

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		preserve their form and function. Quiet rural roads should not be used by hoons and dragsters; Cockburn needs to take more action to prevent such uses. On 11 June 2015, Cockburn Council agreed that Liddelow Road should be formally recognised as a rural road and that through traffic from outside Banjup should be discouraged. Council resolved that Cockburn: (1) support the reclassification of Liddelow Road and Gibbs Road to a Local Distributor Road; (2) investigate traffic design measures to minimise heavy vehicle traffic and speed controls on Liddelow and Beenyup Roads
		The draft strategy implies the duplication of Liddelow Road to become like the near future Jandakot Road because of "higher order functions" planned for the road. This one sentence in the whole of the draft rural strategy belies all the fine words. How can rural landowners support Cockburn planners' strategies if they intend to drive a 4 lane highway through the middle of rural Banjup and yet maintain that they want the natural landscapes to prosper? The divorce from current reality is further exposed when the draft policy goes on to say that it addresses: how development will be designed such that it leaves a positive and memorable visual appearance on the landscape Since when does a 4 lane highway have "a positive and memorable visual appearance"?
		9. Assistance for Landowners Finally, the draft rural strategy speaks of assisting rural landowners: Continuing to assist rural landowners through education, sustainability, proactive compliance work and consistent communication on issues which affect the rural amenity of such areas. If only. Cockburn has done little to help rural landowners in the past. Cockburn's environmental staff are focused on managing the City's own 1,000 hectares of bushland for which they like to win awards. Little practical advice to private landowners is available – there is not even a wildflower and weed identification page in Cockburn's web site. Cockburn's advice to landowners following the devastating 2014 Banjup bush fire was almost non-existent. Programmes for the control of rabbits and foxes in Banjup reserves are severely underfunded, which causes increased problems for rural landowners. More positively, over the past couple of years Cockburn's communication and advice on managing bush fire risk on rural properties has improved significantly.
		10. Pragmatic, Believable, and Supported Rural Planning Policies Moving forward, Banjup, Jandakot, and Treeby rural residents urge

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		councillors and officers to make concerted efforts to re-draft the rural planning policy so that it can be fully supported by landowners. The policy should have 2 components, reflecting the different characteristics of the 2 areas: 10.1. Rural Jandakot and Treeby Recognise that the area's rural amenity is irretrievably lost and articulate strategies for moving towards alternative land uses and promote them to the WA Planning Commission as it investigates future land uses for the area 10.2. Banjup Enshrine the high value of Banjup's rural area in clear policies that will protect and enhance Banjup's natural landscapes and amenities for the next 20 years, including Reaffirming the local classification of Liddelow Road and installing further traffic calming measures Developing and implementing specific planning and operational policies that protect, preserve, and enhance the rural amenity of Banjup The Banjup Residents Group would welcome working in partnership with Cockburn to develop pragmatic and achievable rural polices for Banjup that can be widely supported.
12	Landowner/Resident	3. Please provide your comment below on 'Population and housing'
		The statement that the "Jandakot Water Mound Protection Policy prevents housing in much of the eastern sector" is incorrect. Residential developments have been done in Atwell and Aubin Grove, are ongoing in Calleya/Stockland and planned or proposed at East Treeby (Perron Group) and by the Dept of Housing on Armadale Road. The statement should be replaced by information on those developments.
		10. Please provide your comments below on 'Rural land use, subdivision and development'
		PLEASE SEE MY FULL SUBMISSION SENT SEPARATELY - Paper includes Strategies and Policies which should not be defined in this stage of documentation Paper misses out a lot of relevant information - The statements regarding Jandakot Airport are misleading.
		11. Please provide your comments below on 'Traffic and transport'
		PLEASE SEE MY FULL SUBMISSION SENT SEPARATELY - Paper misses out intermediate distributor type roads - Paper has no information on Metrolink or the impact of the Cockburn to Thornlie rail line.

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	13. Please provide your comments below on 'Opportunities and constraints upon development'
	PLEASE SEE MY FULL SUBMISSION SENT SEPARATELY As discussed below, strategy type statements should be removed from all papers, to ensure a proper due process in balancing Opportunities and Constraints.
	14. Any other comments
	PLEASE SEE MY FULL SUBMISSION SENT SEPARATELY Some of the Profiles (in particular the Rural Land Use one) include a lot of strategies or policies in them already. These should all be removed to ensure the Strategies can be developed objectively in the next phase without any pre-conditioned bias. Putting these in now means there has been no proper consideration of balancing Opportunities and Constraints as specified in the Opportunities and Constraints Profile Paper. These strategy items should be removed, or modified to highlight relevant aspects as issues only and not try to solve or pre-judge decisions on these issues.
	ATTACHMENT
	These Local Profile Papers are meant to provide background information and identify key planning issues. These are then used to help form the next stage, which is to develop Local Planning Strategies. However some of the Profiles have a lot of strategies in them already. These should all be removed to ensure the Strategies can be developed objectively without any preconditioned bias.
	- For example, in the Rural Land Use Profile the statement "Preventing any further sub-division within the Resource zone or Rural zone" is clearly a strategy or even a policy (and not background information or an issue) and should be deleted from this document. If this is left in, it means there has been no proper consideration of balancing Opportunities and Constraints as specified in the Opportunities and Constraints Profile Paper.
	- In fact many of the bullet points in the Rural Land Uses Profile are strategies and should be removed, or modified to highlight relevant aspects as issues only and not try to solve or pre-judge decisions on these issues.
	- Background information is missing from the Rural Land Use Profile. For the Resource Zone it should include information on:
	- where and what developments have been allowed or are planned over the Jandakot Water Mound; such as residential developments at Atwell, Calleya/Treeby, and Aubin Grove and as planned for East Treeby (Perron Group), Skotsch Road, and the Department of Housing on Armadale Road; and Commercial/Industrial developments at Jandakot Airport City and

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		as planned for Schaffer/Urbanstone land.
		- how the Water Mound has been protected for those developments; through Environmental Assessments and District Water Management Strategies; with the requirement for reticulated sewerage systems, and for commercial/industrial areas to have separated drains to capture any potentially contaminated water streams.
		 include the information from the Water Management Profile that "groundwater protection areas have been reduced in their priority", and also from Water Management that one of the main reasons that the Jandakot Mound has declined less than the Gnangara Mound is because "large parts of the Jandakot Mound are now urbanised which has increased recharge" thus showing a beneficial impact from urban development.
		- and from the Infrastructure Profile that the Jandakot Mound now supplies only 3% of the metropolitan water supply (and I believe this is only used to "sweeten" the de-salinised water which is otherwise not healthy to drink).
		- The statement in the Population and Housing Profile that the "Jandakot Water Mound Protection Policy prevents housing in much of the eastern sector" is incorrect as can be seen from the current residential developments at Calleya/Treeby, those planned at East Treeby (Perron Group) and by the Dept of Housing, and the previous developments at Atwell and Aubin Grove. The statement should be removed and replaced by at least the planned or proposed development information.
		- The statement in the Rural Land Use Profile "Ensuring that development of the Jandakot Airport precinct respects the presence of the Resource zone" is highly misleading. The document should state the facts that the City of Cockburn and WA Government have no control and minimal influence over development or operations on Jandakot Airport land because it is regulated by the Commonwealth. Also that the City of Cockburn's request for Jandakot Airport to keep a 200 m buffer zone from residences in the Resource zone has been completely ignored, with land cleared and developments planned to the back boundaries of these "rural" properties.
		- The Traffic and Transport Profile seems to jump from Regional roads, to Local roads, and misses out intermediate distributor type roads, such as Jandakot Road and Liddelow Road. These types of roads should be included since major upgrades are planned and they are specifically mentioned in the Rural Land Use Profile.
		- The Traffic and Transport Profile seems to have no information on Metrolink and the Cockburn to Thornlie line. This will require expansion at Cockburn Central station, increased traffic and parking, increased bus linkages, etc. which will all impact local

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		planning decisions.
		- There are several different types of land within the Resource and Rural zones. They cannot all be handled by one blanket guideline or limitation as is currently done in the Rural Land Uses Profile.
		- as an example, as the document stands it completely contradicts the recent decision by Officers, endorsed by Council, to promote urbanisation and residential development of land on Skotsch Road, Treeby.
		- another example even better suited to development than Skotsch Road (which is primarily Resource Enhancement Wetlands) is the area covered by Boeing Way, Solomon Road North, adjacent properties on Jandakot Road, and properties on the west side of Coonadoo Court.
		- The Rural Land Use Profile suggests the City should manage areas surrounding the Resource zone to achieve "a level of quiet enjoyment and amenity". Any such amenity is being continually eroded for this area. All properties are squeezed between, and will be directly bounded by, commercial/industrial development at either Shaffer/Urbanstone or Jandakot Airport, or will have significant land area resumed for Jandakot Road upgrade. Due to the proximity of these incompatible developments and the ANEF noise contours, this land would be best designated for similar commercial/industrial developments e.g. storage, warehousing, logistics, offices, etc.
		 this area includes minimal wetlands, which will anyway be connected to drainage sumps for the Jandakot Road upgrade. the area contains no Bush Forever sites. currently interface issues have to be managed between 19 rural residential properties in the area and the surrounding incompatible developments. If land use for commercial/industrial purposes were allowed, this would reduce to only 1 interface for the property at the end of Coonadoo Court. Development would be consistent with strategic objectives. The Economy and Employment Profile identifies: a target for increased employment self-sufficiency within the City of Cockburn. significant capacity for commercial centres to expand based upon existing agglomerations of activity and available transport infrastructure. It states that strategic employment centres include industrial areas of Jandakot Airport, and also Jandakot East. the potential for clusters of employment offices, with "a further area for investigation is the opportunity in the Core area, located east of Kwinana Freeway, close to light industrial areas and other employment locations including Jandakot City".
		The Opportunities and Constraints Profile identifies the following development opportunities: - near Jandakot Airport, promoting land uses not sensitive to

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		noise, and - opportunity for better land use near to developed transport and industrial infrastructure which exists at the airport opportunity to intensify development near major industrial areas opportunity to leverage further industrial development near major freeway, highway and rail corridors. All of these apply to this specific area. These opportunities need to be balanced against the minimal constraints in order to develop strategies to deliver the best planning outcome for the area.
13	Landowner/Resident	11. Please provide your comments below on 'Traffic and transport' In relation to alternatives to Roe Highway and listing of 3 precincts for planning traffic (Stock to North Lake, North Lake to Bibra Lake and Bibra Lake to Kwinana Freeway). Consideration is to be given to ensure the North Lake suburb area is not adversely impacted and becomes an isolated section of homes surrounded by major 4 and 6 lane roads. Access in and out of these areas is to be prioritised and maintained so that residents don't have to drive all around and south to get out as crossing a 4 lane Farrington road out of Progress Drive would be dangerous and prohibitive. There have been comments of high traffic on Farrington in peak times but I drive this every day and it is a pleasant drive from Bibra Drive to North Lake. This area should not be duplicated and made major. This would encourage trucks to cross from any proposed connection from KF to Farrington at Murdoch drive and adversely impact the housing, amenities, access and nature feel of the North Lake, especially North Lake west housing area.
14	Landowner/Resident	13. Please provide your comments below on 'Opportunities and constraints upon development' One of the major component here is older suburbs. The City should be planning to improve them rather than just expanding and bringing new projects to the Unbuilt areas. The Older part and Newer part of Yangebup in the contrast that is easily visible. Neither the City is doing anything to improve the older part not bringing any new development there. It's just building the newer part and increasing the divide and miseries for the people in the Older part. There is no inclusiveness in the development rather the older part is being further distanced by the widening of the Spearwood Avenue and bringing more heavy traffic in the suburb. This will mostly impact the houses in the older part. This city has been made aware of these issues several times but no substantial development in this regards is visible on ground. A New Shopping Centre and petrol station in the newer part of Yangebup?? What about the old part? A new bowling club again in the newer Yangebup. Where are the principles of inclusive growth for sustainable development being practiced by the city planners??

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15	Landowner/Resident	Please provide your comments below on 'Physical features
		and natural resource management'
		Manage natural bush paths to better suit walkers and recreational users. i.e. add clay/natural binders to loose soft sand to encourage walkers and cyclists near lakes. for example. Thomson lake would be great to cycle and walk around but the incredibly soft and dry sand is very prohibitive.
		3. Please provide your comment below on 'Population and housing'
		The move to high density housing will adversely affect traffic and living conditions. The council should ensure small dwellings (sub 500m2) are restricted to ensure that those wanting affordable houses with room for a shed/storage is available. The move to apartments and cookie cut tiny units is incredibly prohibitive to active lifestyles and those with hobbies involving larger equipment. Quite simply, with higher population comes higher traffic and resource use.
		4. Please provide your comments below on 'Economy and employment'
		Aim to increase small office space at major hubs within the CoC. With the increase in internet quality, moving forward, more offices will shift from the city to more manageable, smaller offices/hubs. With this will come reduced demand for transport as people can now cycle/walk/bus much smaller distances.
		6. Please provide your comments below on 'Tourism and visitors'
		Develop mountain bike and cycle trails to interlink and bring in both local (from other council areas) and national visitors. Continue with the addition of dive/snorkel trails.
		7. Please provide your comments below on 'Recreation and open space'
		Improve interlinking of cycle network.
		9. Please provide your comments below on 'Cultural heritage, urban design and heritage'
		Display and teach more about Cockburn's heritage and history of the area.
		10. Please provide your comments below on 'Rural land use, subdivision and development'
		Limit subdivision. As a young first home seeker and someone with

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		both a motorcycle and vehicle, new subdivided homes are incredible prohibitive to my lifestyle, many others I speak to are in the same boat and short of winning the lotto, we cannot afford larger blocks that will allow us to live this lifestyle. Not everyone wants a tiny house or apartment and with a higher populations and housing density will come all sorts of issues many we are already seeing (like traffic increases) 11. Please provide your comments below on 'Traffic and transport' Improve choke points leading to major arterial roads (i.e. stock
		road).
16	Landowner/Resident	Please provide your comments below on 'Physical features and natural resource management'
		Less priority needs to be given to environmental resources such as the wetlands. Cockburn needs less 'raw' bush and more manicured parks and lakes in their place.
		4. Please provide your comments below on 'Economy and employment'
		I'm seeking to move my business operations out of Cockburn due to the excessive congestion and lack of direct access to primary roads. If you want to improve the economy and employment prospects, you must provide the infrastructure that businesses need.
		5. Please provide your comments below on 'Retail and commerce'
		A majority of my retail and commerce is completed online.
		6. Please provide your comments below on 'Tourism and visitors'
		Tourists and visitors aren't interested in Aboriginal heritage or wetlands. They are more interested in beaches, restaurants, bars and retail. Cockburn lacks severely in this regard compared to Cottesloe and other Perth coastal districts.
		11. Please provide your comments below on 'Traffic and transport'
		Cockburn has by far the worst roads in Perth. You have no direct Freeway or Roe Highway access for residents living west of Bibra Lake. There's also no direct access for businesses in that same section, this has a significant negative impact on operating costs. As per the comments above, it's at the point where my business operations are seeking alternative sites with better access. It's

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		quite obvious that Roe Highway should have been built to at least Stock Road to provide that direct access. Instead you have jeapodised the future of Cockburn by risking grid lock. I own a car and I will NOT use public transport. Unless there is a major overhaul to the road network in the area, it's going to be gridlock.
17	Perron Group	1. RETAIL AND COMMERCE
		The LPP acknowledges the role of Cockburn Gateway as forming part of the City's highest order activity centre, being the Cockburn Secondary Centre under State Planning Policy 4.2 (SPP4.2). The stated intention under the LPP is for this activity centre to be positioned as a Strategic Metropolitan Centre under SPP4.2 and the most influential activity centre in the South West Metropolitan Sub-Region by 2031.
		It is noted that the progression of the activity centre towards a Strategic Metropolitan Centre would necessitate the maturation of land uses within the broader activity centre and would involve the provision of high quality strategic employment, particularly knowledge based industries.
		Perron Group are supportive of the notion of increasing the status of the activity centre in principle, provided that the maturation of land uses and provision of high quality strategic employment is appropriately located by being dispersed throughout the activity centre in its entirety and does not prejudice the primary retail operation of Cockburn Gateway.
		It is also noted that the increase in status of the activity centre would align with the strategic intent to progressively expand Cockburn Gateway as per the draft Amendment No. 1 to the Gateways Precinct Local Structure Plan, which is currently being considered by the City.
		2. ECONOMY AND EMPLOYMENT
		A key theme of this LPP is to increase the employment generation and resulting employment self-sufficiency of the region. In this regard, the LPP states that there is potential for the expansion of strategic employment at a number of the City's key activity centres, including the Cockburn Secondary Centre. Specifically, the LPP states the following: 'Cockburn Central has the potential to offer knowledge intensive consumer services such as education, healthcare, and strategic services to a regional, state, national or international economy.'
		As discussed above, Perron Group support the intention to increase employment generation within the Cockburn Secondary Centre on the basis that these activities are appropriately located

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	and will not detrimentally impact upon the retail role of Cockburn Gateway.
	Whilst we understand the LPP's are high level/aspirational documents, the use of the generic term 'Cockburn Central' is somewhat ambiguous as it may refer to either the activity centre as a whole or specifically to the portion of the activity centre located within the suburb of Cockburn Central. As such, it is respectfully requested that the terminology is clarified to provide certainty as to what the future intentions are for employment generation within the activity centre.
	The LPP also provides the following action in relation to commercial land: 'Revitalisation Strategies will continue to look at the appropriateness of current zonings within activity centres to determine whether amendments are needed to ensure an appropriate quantity of commercial zoned land, and a suitable range of permissible land uses.'
	It is respectfully requested that any changes to commercial zonings should have due regard to the status of the Cockburn Secondary Centre and should therefore not detract from or undermine the role of the Centre through ad hoc 'out of centre' development.
	3. TRAFFIC AND TRANSPORT
	This LPP details the City's intention to reduce traffic congestion, particularly around Cockburn Central and other activity centres, and to improve the overall connectivity of transport infrastructure. As part of this process, the City has progressed with a proposed traffic bridge and collector roads over the Kwinana Freeway between Armadale Road and North Lake Road, with a stated intention to bypass traffic at Cockburn Central and thereby divert regional traffic out of the town centre.
	Perron Group strongly support this initiative, noting the positive impacts the reduction in traffic congestion would have on Cockburn Gateway and the broader activity centre, particularly in relation to the planned expansion of Cockburn Gateway where the traffic capacity of the surrounding road network is a critical aspect to the operation of a larger centre.
	4. CULTURAL HERITAGE, URBAN DESIGN AND LOCAL CHARACTER
	This LPP broadly reiterates design matters contained in SPP4.2 that seek to ensure a focus on quality urban design outcomes for new development, including improvements to the public realm with the aim being to see shopping centres function more as 'town centres' so that they contribute to a unique sense of place for the community.

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		Perron Group acknowledge and support the matters raised in this LPP, noting that the draft Amendment No. 1 to the Gateways Precinct Local Structure Plan which is currently being considered by the City accords with the intentions of this LPP as it contains provisions to ensure high quality urban design including provisions relating to precinct character statements, site planning and built form, external interfaces and the enhancement of the main street environment.
		SUMMARY As discussed above, we are generally supportive of the City's aspirations as outlined within the LPP's. Given the potential implications from the future Local Planning Strategy and Local Planning Scheme, and the role of Perron Group as a key stakeholder within the Cockburn Secondary Centre as owners of Cockburn Gateway, we request that meaningful consultation at all levels of planning be undertaken with Perron Group for any proposal likely to impact their site or the immediate catchment.
18	Landowner/Resident	Overview
		The City has grown to such an extent that our Special Rural amenity has been lost. Development around us is happening so fast that I don't think planners appreciate how it's impacted on us. We are now surrounded by development and have been put in a position where nobody would think we have a special rural/lifestyle block. Figures show that no one can sell in our area. Only 1 property has been sold in the last three years. Buyers prefer to go to Banjup or elsewhere for the special rural/lifestyle. People can see what is happening, despite the trees the rural lifestyle is gone. As stated in Perth and Peel @ 3.5million our area is to be
		PLANNING INVESTIGATION. Something that council has denied, even with the vast majority of people in our zone wanting investigation of some sort. The W.A.P.C. sees how the developments around us is eroding our lifestyle and that our rural amenity is being lost. We submitted this to W.A.P.C. IN July 2015.
		In light of this by the W.A.P.C we would like the council to work with us to achieve what the majority of rate payers in our area request.
		Just the whole question of Jandakot Road, a four-lane road, expected to carry 30,000 cars and trucks per day, retaining walls, drainage, sewerage, and sub-division could be addressed now making for better cohesive planning, not fragmented and adhoc planning.
		1. Water Management.
		Groundwater Protection Area – Jandakot

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		Understanding why the Council has previously maintained the Resource zone over said Rural land. This policy held by council must be reviewed. To be said that what is done on a small number of rural lots depicts the integrity of the mound when development of Treeby (Calleya), Schaffer (Urban Stone) Doh, Light industrial, Atwell, etc is unreasonable. In fact, on <i>Local Profile paper on Water Management Item 15.6 Attachment 2 page 299</i> states "large part of the Jandakot Mound are now urbanised, which has increased recharge."
		 With modern building technology the mound can be protected. Deep Sewer to all lots. Storm water filtration of contaminants. Design of parks and landscaping Because lots are smaller with reduced gardens less nutrients entering the water table Buildings with storm water soak wells catch clean water from the roof to assist with the recharge of the mound.
		The area concerning from East of Berrigan to Fraser Road, North of Cutler Road to the Airport boundary contain some identified wetland. They are not classified as significant and can be managed with appropriate planning by developers.
		2. Rural land use, subdivision and developments
		In answer to the policy statement Maintaining the rural, natural bushland and environmental landscapes of the Resource zone above the Jandakot ground water through strict land use and development control: Ans. This policy has been voided with the Treeby Development Strategy Plan. The proposed extensions of Jandakot Road, the Shaffer development. The light industrial and commercial area below and along Calleya, the urbanisation of Atwell.
		Policy statement "Preventing any further sand mining activities with the Resource zone, that destroy the elevated bushland sand ridges that run through the area." Ans. How does the Council propose this to happen. Is sand only to be mined in already quarried sites.
		Policy statement "Preventing any further subdivision within either the Resource zone or Rural Zone. Subdivision within the Resource zone causes fragmentation of the natural environment, with the likes of driveway, firebreak, building envelopes and bush fire requirements are considered. This impact of the natural environment, and the extensive network of wetlands that exist, directly threatens the Jandakot ground water mound and further introduces pressure for development to occur." Ans. The wetland already addressed above (in Water Management Paragraph 2) aren't significant wetlands.
		Policy statement "Ensuring the expectation of landowner within

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		rural areas matches the strategic intent of such areas – whether that is for the natural landscapes of the Resource zone to prosper, or whether that is for productive rural industries to be expected to occur in the Rural Zoned area;
		Ans. With the proposed development of Shaffer, the widening of Jandakot Road, the Treeby Development Strategy Plan and the development of the airport land has now degraded the rural amenity surrounding these properties.
		3. Population and Housing.
		A. A report by the Infrastructure Australia forecast that Perth's population forecast to reach 4.4million by 2046. There must to be proper planning not the piece meal approach to date. Being Treeby, Shaffer, Jandakot Road, Airport development etc.
		4. Any Other Comments.
		 Additional platform at Cockburn Central train station. More people will be looking at Jandakot Airport for work, Cockburn central, Gateways shopping centre, Jandakot light Industrial area will all become more attractive for workers using public transport. Armadale Road/ North Lake Road will bring more passing traffic making shopping areas at Gateways and Cockburn Central more attractive. Jandakot Road Duplication will see even more cars and trucks using it. All things point to this becoming more urbanized sought-after location with good road, rail, shopping, work opportunities. How can Council protect/prosper the rural amenity? The above 4 points are not stoppable. Change will only keep occurring.
19	Hamilton Hill Community Group	1. Please provide your comments below on 'Physical features and natural resource management' Cockburn is part of a region that has been designated the Southwest Australia Ecoregion (SWAE), one of only thirty-five 'biodiversity hotspots' in the world. Reconciling growth with biodiversity is a key factor facing urban design, planning and natural resource management. Streetscapes provide a great opportunity to provide green corridors for native birds, as well as shade and amenity, particularly when streets are near natural areas. Council could consider a Verge Conversion programme to assist residents to contribute to this, i.e. offer services of council bobcat to clear verges of weeds and grass to enable planting of suitable low growing native bushes. Add 'and local biodiversity' or similar to 'Improve the appearance of streetscapes, especially with trees suitable for shade' Great to see that sand and limestone

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		extraction and management is being considered esp in the context of approaching 'peak limestone' in the metro area. We must ensure 'ecosystem services' are maintained and enhanced Reevaluate the definition of traffic congestion not relative to what we are used to, but to what other Cities of similar size/target population experience. Recognise we are in a position to 'future proof' public transport and reduce reliance on cars Review type of cycleways provided throughout the City. Current infrastructure does not encourage safe and comfortable cycling (no separation of cars and cyclists, no shade) Expand the definition of recreational, social and sporting facilities to emphasise nature play and manage existing and new reserves accordingly
		2. Please provide your comments below on 'Water management' Identify methods to implement water saving measures in private developments (eg planning incentives for developers or homeowners that implement grey/rainwater recycling) Water extraction licences are not an indicator of sustainable water use. Dept of Water is reviewing licence allocations, how is the Council preparing for the probable reduction in its licences for extraction? Whilst the ICLEI targets are a great start, they do not match the decline in rainfall, expansion of built areas or extraction for amenity sites. What is Council doing to facilitate uptake of the ICLEI targets at a domestic and industrial scale, as these efforts are not obvious. The City as a whole has a vast amount of grass that is regularly watered throughout the summer. Only recycled/rain/grey water should be used.
		3. Please provide your comment below on 'Population and housing' Largest increase in population age groups to be 5-9 year olds, provision of suitable nature play and nature education spaces are essential Density targets in some areas will result in more houses on smaller blocks = less tree cover natural areas close to housing estates are very important to protect real estate values, provide healthy lifestyle for residents We need high density, architect designed, sustainable, liveable neighbourhoods using alternative construction methods and materials. Solar panels should be compulsory on all new buildings. And new housing stock must meet good design principles - ref G London book. Shared ownership housing projects should be encouraged and facilitated by identifying incentives and strategies to allow alternative housing procurement and finance models to develop. We need to hold back on building everywhere to ensure that there is a continued supply of land available for residential development that addresses the future needs of our diverse community and households.
		4. Please provide your comments below on 'Economy and employment' The City could consider supporting "business incubators" in community hubs to increase the activation and growth of local business development to support local employment opportunities.

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		5. Please provide your comments below on 'Retail and commerce' The strategies for growth of lower-level, smaller commercial centres driven by population expansion will require careful planning to ensure these centres are "people friendly" and not primarily designed around parking spaces. In established areas where the City has been progressing revitalisation strategies these have increased residential densities within proximity of activity centres. This includes smaller centres. The City needs to inject finances from the income derived from these increased densities into upgrading lower level, small commercial centres. The planning of these upgrades needs to be undertaken in a consultative manner with input from residents using those centres. Incentives to bring local manufacturers/producers/artisans into commercial retail hubs/district centres — bring some heart, soul, feeling to these concrete shopping centres. Create opportunities for community, business and industry at neighbourhood and local centres Encourage local centres to be upgraded and revitalised Focus on local centres to reduce need for commuting and reduce pressure on parking at larger centres create planning framework that allows mixed use in residential area
		6. Please provide your comments below on 'Tourism and visitors' Let's build the only east-west biodiversity corridor with an awesome pedestrian and cycle path between the ocean and the Lakes the Metro area! Provide visitors to Freo and Perth an experience other than shopping and cafes. The wetlands can be the equivalent to a botanical garden, carefully demarcated paths, plaques for the different plants — an interactive learning experience. The Power Station holds the potential to be the most exciting living/arts/retail/high class hotel/entertainment centre in WA. Ridgelines must absolutely be protected from housing and road development. The ridges in Cockburn are some of the few remaining in the metro area and are a real asset. Security at coastal parking areas is a concern, with many reports of cars being vandalized and broken into. What will be done to address security concerns? improve cycling infrastructure (safety and comfort)
		7. Please provide your comments below on 'Recreation and open space' Need to clarify what's the goal for provision of POS and recreation areas? Is it to have some type of POS within a 5 or 10 minute walk from most residential areas? Is it to place POS and rec areas, esp sporting, within a certain distance of community hubs (ideally to either reduce the amount of car trips or to enable drivers to do more with the trip such as go to shops after they drop the kids off at footy practice). A hierarchy for provision of POS services might be needed. Emphasise 'ecosystem services' of open space How do parks fit into an urban network of green space that allows migration of native wildlife? How will open space within private developments be useable and improve our urban environment?

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		We must stamp-out the current boundary-to-boundary
		development of lots.
		8. Please provide your comments below on 'Community
		facilities'
		Strategies to ensure that older suburbs where "revitalisation
		strategies occur" include community hubs, not just increased
		housing densities, are not included in this document. If
		Neighbourhood and Local Services include community centre buildings they should not be taken as part of the 10% POS.
		Deduction to gross subdivisible area for POS calculations would
		be preferable. Cockburn Central is NOT central. It is at the south-
		east corner of the City of Cockburn. Residents in the northern
		suburbs, particularly North Coogee and Hamilton Hill in the north west, are not going to use Cockburn Central. Therefore we would
		want to see additional focus on developing neighbourhood
		facilities, looking into community centres for each of the suburbs,
		not one main centre focused round a shopping mall. In addition,
		Cockburn Central has very little significance for the community of outer suburbs such as Hamilton Hill, and it cannot replace a sense
		of community fostered by 'historic content'. Community identity
		should not be focusing on Cockburn Central. Ensuring that there
		are sufficient local facilities across the community is a more
		important aspect and should not be neglected at the expense of Cockburn Central. Focusing on ARC and Cockburn Central
		reduces community spirit of more established areas.
		9. Please provide your comments below on 'Cultural heritage,
		urban design and heritage' This document does not make mention of the removal of Roe 8&9
		from the MRS and opportunities available for better urban design
		on land that is rezoned Aboriginal heritage of areas is not listed by
		DIA e.g the land adjacent to Dixon Park that was an Aboriginal
		camp site. We need a strategy to identify these areas and provide interpretation and preservation. Within reason we need to change
		the way in which we develop so that subdivisions are NOT bulk
		earthworked, and any tree over a certain age must be retained.
		Greater scrutiny must be taken when - and after - granting
		planning permission ensuring that % of block building requirement is actually adhered to – it is NOT at the moment. The character of
		these developments is also responsible for the loss of trees in
		more established suburbs, such as Hamilton Hill. Subdivisions are
		often cleared of all vegetation before they are sold or developed.
		Policies to protect existing trees on private land are urgently
		needed. A shopping centre is not an activity centre. Currently activity centres do not encourage human interaction. We should be
		looking at community building strategies – how do we get people
		to connect? Content of Aboriginal history is very sparse,
		especially compared to European history. Residential character is
		driven by home builders with little or no response to the cultural context of the suburbs. Guidelines are required to curb this. More
		diversity in housing type as well as alternative procurement
		methods and ownership models should be encouraged to increase

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		the percentage of homeowners that build to live rather than build to sell. As a major landowner, the City should participate through model developments in cooperation with private developers and groups of owners.
		10. Please provide your comments below on 'Rural land use, subdivision and development' No Answer
		11. Please provide your comments below on 'Traffic and transport' Public transport is linked to population and demand, which take time and resources to develop, and State government action to implement. A local, 'quick win' solution for Cockburn is to build more active transport into its planning and development (i.,e. cycling lanes, dedicated dual use paths, bike secure storage at destinations such as shopping centres). Traffic congestion is pretty much non-existent at this time. People get upset because it takes them more than one change of light to get through an interchange. We need to avoid the hysteria and get some solid current vehicle movement numbers before making ANY road decisions. In the City's new areas the local street network has been designed through the structure planning and subdivision process as new suburbs are developed. This includes a network of neighbourhood connectors, access streets and laneways. This process is not working – Rigby Ave in Spearwood is a good case in point. Over 3,000 vehicle movements a day – which means the road should be redesignated – and it was a peaceful suburban road before Eliza/Ocean Ponds was built. Calming won't stop cars using the road. People's lives are being (seriously) adversely affected by lack of planning for access roads around new developments. Public transport – we need a circular bus linking main Cockburn activity centres. Cycling in Cockburn is not safe or comfortable. Cockburn is a relatively flat suburb and cycling should be encouraged. To achieve this cycle paths need to be designed that are safer, separated from car traffic where possible and shaded using trees. Opportunities for future public transport solutions should be considered with state government at the same time as subdivision occurs and more land becomes available for development. The document recognises the importance of removing the Roe Hwy reserve from the MRS. Another precinct should be added: Stock Road to Clontarf Hill. The document should acknowledge the importance of removi
		strategies. This also includes opportunities for cycling, walking and horse riding trails.
		12. Please provide your comments below on 'Infrastructure services' It would be useful for the city to develop a plan for using the current sumps that exist in older areas of Cockburn. The sumps are currently fenced off areas that need to be maintained by

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		Council staff. An investigation into how to improve them and make them useful environmental habitat as well as more aesthetically pleasing is needed. This is an opportunity to engage with urban water sensitive design strategies to develop living streams to replace sumps where possible (eg along the Roe Hwy reserve?)The upkeep of these areas could be good community projects. Underground power program — why are power poles being replaced with new power poles? So many streets are unable to plant street trees due to overhead power lines. BP pipeline easement - develop a recreational strategy.
		13. Please provide your comments below on 'Opportunities and constraints upon development' The key here is how development will be designed so that it leaves a positive and memorable visual appearance on the landscape. For many residents, development has not been visually appealing (even memorable in some cases because of the extreme unattractiveness). Wetlands give the opportunity for promoting high density development? Buffer zone needs to be defined? Residential building along freeways/highways should be promoted – noise and vibration can be mitigated. The presence of the Roe Hwy reserve is an opportunity to implement planning and development strategies that are unique in terms of environmental response, social impact.
		14. Any other comments As a Community Group we asked our members to look at the Local Profile Papers and send us their responses. Through this process we hoped to encourage a wider level of community feedback and involvement than is standard. These responses are from many of our members; not from an individual. If you have any questions please let us know - and thank you for the opportunity for this community consultation.
		A couple of general comments we received that were not designated as responses to any particular paper were: Can we consider the social impact of developments and planning decisions - this should become a fundamental principle of the planning scheme?
		Can we create the opportunity for residents to be involved in the development of the Local Planning Strategy via a process of deliberative democracy. Eg. citizen jury by ballot, 13 sessions over 2 years, each focusing on one local paper; educate, debate, decide.
20	Landowner/Resident	Re: Cockburn's Local Planning Strategy for Rural Land Use
		In view of the Final Perth and Peel@3.5million suite of strategic land use planning and infrastructure documents released by the State Government.23rd March 2018 South Metropolitan Peel Sub Regional Planning Framework, which clearly indicates that Jandakot and Treeby

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		is subject to Planning Investigation	
		Strongly Suggest the Council review their Strategy to include the above reports recommendation for the Jandakot and Treeby area	
		Also ask that the Report reflect the Council approvals and support it provided to Development in the area over the past Years Calleya Stockland Development, including the additional 450 lots in the initial buffer Zone, Amendment No 112 in Reserved Parkland and more recently 14th September 2017, the Skotch Rd Precinct Resource Lots.	
		Jandakot Airport Master Plan 2014 and 2019, development over our precious P1 Water Mound.	
		Urge the Council to direct the Planners to be Consistent, Make Better, Cohesive Planning Decision Stop the Fragmented, Ad Hoc Planning and Inconsistent decision making, and comments.	
		Take Notice of the Submission and the Comments provided by the TPG Town Planning Group 26th March 2016 and the BRG Banjup Residents Group, Please Note, A lot of Personal Family time and Money went into these reports by affected residents whom have been living and caring for the area for a long time.	
		Further say, that the Cockburn Council review the Jandakot Road Upgrade (NOT the proposed Dual Lane) in Line with the future of the area	
		Assuring you of our best attention	
		Your Loyal Residents and Ratepayers	
21	Main Roads WA	I refer to your correspondence dated 5 February 2018 requesting Main Roads comments on the above proposal. Please accept our apologies for the delayed response. As stated in the supporting papers (Attachment 12 - Traffic and Transport) Main Roads is currently developing and delivering a number of projects in the City of Cockburn. These projects include: • Murdoch Drive Connection • Roe Highway/Karel Avenue Interchange • Kwinana Freeway Northbound Widening - Russell Road to Roe Highway • Armadale Road to North Lake Road Bridge • Armadale Road Duplication Upgrade - Tapper Road to Anstey Road Further information is available on all of these projects on the Main Roads website as per the hyperlink below: https://project.mainroads.wa.gov.au/home/southmetropolitan/Pages/default.aspx	
22	Department of Education	Thank you for your letter dated 5 February 2018 regarding the Local Profile Papers for Local Planning Strategy. The Department has reviewed the document and wishes to make	

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		comments on the following local profile papers;		
		accommodate students. Any additional growth in such areas is		
		often not planned for by the Department as it was not initially intended for residential development.		
23	Water Corporation	Thank you for the opportunity to view and comment on the profile papers associated with the City of Cockburn Local Planning Strategy.		
		As you will be aware, the Water Corporation provides water, wastewater and drainage services to the City of Cockburn, its residents and businesses.		
		Recently we provided support for a Water Sensitive Cities indexing workshop which identified progress towards becoming a more		
		Water Sensitive City.		
		We are available to provide data and information resources to support the City in the formulation of the strategy.		

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NO.		In the first instance we can provide information about the servicing capacity of water, wastewater and drainage infrastructure, especially where higher density development may be proposed. There may also be opportunities to explore feasibility of using some of the Corporation's land, water and infrastructure assets to enhance liveability and climate resilience. Examples include: • Using corridors for pedestrian / cycle ways and or habitat enhancement • Use of drains to develop living streams • Sourcing alternative water from drains, reservoir roof catchments and the Woodman Point wastewater treatment plant • Development of pump station sites for things such as battery storage / micro grids and water for heating / cooling The issue of the Woodman Point Wastewater Treatment Plant odour buffer was also raised in one of the papers. The State Planning Strategy 2050 and the recently released Perth Peel @3.5 million planning framework identifies wastewater treatment plants and their buffers as an alternative source of water and other resources which can be used to help support the liveability, climate resilience and sustainability of urban areas. Consequently these have been identified as Strategic Resource Precincts. Recently Water Corporation facilitated an Ideas For workshop for the Subiaco Wastewater Treatment Plant Strategic Resource Precinct. Refer to https://watersensitivecities.org.au/content/ideassubiaco-strategic-resource-precinct/ The workshop identified a wide range of ideas for utilising and managing land and other resources in the area. A similar approach could be considered for the Woodman Point WWTP odour buffer. Thank you for your letter of 1 June 2017 requesting comment from
27	Health	the Department of Health (DOH) on the above proposal. The DOH provides the following comment: The planning scheme and associated planning strategy should include a direct reference to 'enhancing the public health of the community' (or words to that effect) as part of their aim and objectives. Good public health outcomes are what connects and binds the various aspects covered in planning schemes and strategies. The proposed documents should also consider potential issues in relation disaster preparedness, recovery management or the associated impacts on public health. land use planning can guide the use of land to effectively reduce risk and enhance sustainability for areas prone to hazards such as flooding (including storm surge), fire, strong wind / squalls and erosion. Refer to: https://www.em.gov.au/Documents/Manual07- PlanningSaferCommunities.pdf The DOH will provide a more detailed comment during the consultation process.
25	TPG + Place Match,	
	on behalf of the	Further to our previous submission dated 16 March 2018,

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	landowner	TPG+Place Match, on behalf of the landowner of Lot 31 (No. 139) Jandakot Road, Jandakot, is pleased to make this revised submission in relation to the City of Cockburn's (the City) draft Local Profile Papers. Once adopted, we understand that the profile papers will inform the preparation of the City's new Local Planning Strategy, which will provide strategic direction relating to land use planning and development of the district over the ensuing years.	
		Our submission has subsequently been revised following the release of the Perth and Peel @3.5 million Sub Regional Planning Framework, which now identifies the Submission Area as 'Planning Investigation Area'. This submission letter supersedes our previous submission dated 16 March 2018.	
		This submission is made on behalf of the landowner of Lot 31 (No. 139) Jandakot Road, Jandakot and relates to our Client's site specifically, but also more broadly to the consortium of lots contained in the 'Jandakot Vision Process' area (the Submission Area), that was subject to a visioning survey coordinated by the City and considered by Council at its meeting held 14 September 2017 (Item 15.7) and subsequent Council meetings.	
		The Submission Area inclusive of our Client's land is identified in Attachment A.	
		Please find our submission below.	
		1. <u>Submission Overview</u>	
		We note that the intent of the local profile papers is to provide background and context to specific issues within the district to inform the preparation of strategies to be contained within the City's future local planning strategy. However, we note that some of the draft local profile papers also contain strategies and policy statements which would ordinarily be formed through the process of preparing a local planning strategy. Specifically, we note that the draft <i>Rural land use, subdivision and development</i> local profile paper contains the following policy statements:	
		 Maintain the rural, natural bushland and environmental landscapes of the Resource zone above the Jandakot groundwater mound, through strict land use and development control; Prevent any further sand mining activities within the Resource zone, that destroy the elevated bushland sand ridges that run through the area; Prevent any further subdivision within either the Resource zone or the Rural zone. Subdivision within the Resource zone causes fragmentation of the natural environment, with the likes of driveway, firebreak, building envelopes and bushfire requirements. This impact of the natural 	
		environment, and the extensive network of wetlands that exist, directly threatens the Jandakot groundwater mound	

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		and further introduces pressure for development to occur;
		 Ensure the expectation of landowners within rural areas matches the strategic intent of such areas – i.e. that is for the natural landscapes of the Resource zone to prosper.
		We consider that these policy statements have been prematurely arrived at and should be removed from the profile paper to allow policies to be properly developed through the process of preparing the local planning strategy in order to ensure a holistic approach is taken to policy development.
		We also note that the above policy statements potentially conflict with statements contained within the other draft local profile papers. For instance, the paper on <i>Opportunities for and constraints upon development</i> identifies the opportunity to leverage higher and better land use outcomes for land in proximity to the Jandakot airport. The Jandakot airport precinct is identified as a Strategic Employment Centre and is forecast to contain more of the future jobs in the City. However, the Jandakot airport precinct is also constrained with respect to land availability, and in order to allow the precinct to reach its fullest potential, the City should be open to a process of reviewing the zoning, opportunities and constraints to development to determine whether additional employment generating land uses may be permitted on surrounding land while still maintaining the integrity of the environmental assets within the precinct.
		The strategic role of the land surrounding the Jandakot airport is further reinforced within the <i>Traffic and Transport</i> local profile paper, which recognises the critical need to develop further non-aviation land around Jandakot airport to secure strategic diversity of income and long-term viability of the airport.
		We recognise that any review of zoning over the Submission Area currently zoned 'Resource' would need to be supported by detailed environmental, bushfire, transport and civil investigations to be funded and coordinated by the landowners. However, the City's presumption against any further subdivision or intensification of land use as indicated by the policy statements contained in the draft <i>Rural land use, subdivision and development</i> profile paper precludes the ability for landowners to progress further detailed investigations to determine whether there are alternative land use outcomes that could be supported while still maintaining the environmental outcomes identified for the area.
		Our detailed comments provided in relation to the draft local profiles are contained at Attachment B to this submission.
		2. A Case for Urban Investigation Area
		As part of this submission on the local profile papers, we would also like the opportunity to address the key considerations relating

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		to the opportunity to consider the Submission Area as an 'Urban investigation area' within the City's future Local Planning Strategy below.	
		Sub Regional Planning Framework	
		We note that the final version of the Perth and Peel @ 3.5 million Sub-Regional Planning Framework (the Framework) was released on the 23 March 2018 and provides high level guidance to future land use decision making. We note that the South Metropolitan Peel Sub-Regional Planning Framework identifies the Submission Area as a 'Planning Investigation Area' as part of the strategic reconsideration of land use in the sub-region. The document recognises that certain matters are required to be investigated to determine whether any possible change from the current zoning can be supported. For the Jandakot / Treeby area, the following matters are required to be investigated:	
		 Impacts, risks and management of Jandakot groundwater resources (existing Priority 2 Source Protection Area); Protection of significant environmental values; and ANEF considerations associated with Jandakot Airport. 	
		Current statements included within the draft Cockburn Profile Papers potentially obstruct the opportunity identified in the Framework to undertake the necessary investigations to determine whether alternative land use outcomes can be supported in the Submission Area. These statements previously identified above, should therefore be removed from the Local Profile Papers.	
		We are of the view that other potential land use outcomes for the Submission Area have not had the opportunity to be explored in further detail, while there is clearly a case for alternative land use outcomes given its proximity to Jandakot airport, proximity to services and infrastructure and noting the incremental encroachment of urban land within and around this precinct. We are of the view that the Submission Area be identified within the City's future Local Planning Strategy as a potential area that may be able to support Urban land uses subject to further detailed investigations being completed by the landowners. This would ensure consistency with the recently released Sub-Regional Planning Framework and would also be consistent with the City's recent decision to support including the Skotsch Road landholdings within an Urban zone. This is discussed in further detail later in our submission.	
		We therefore respectfully request that the Submission Area be identified as an 'Urban investigation area' within the	

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	City's future local planning strategy to allow these investigations to take place. An 'Urban investigation area' would not presume an urban outcome but would allow landowners to undertake the necessary detailed investigations to determine whether alternative land use outcomes could be supported by the relevant State and local decision makers.
	Jandakot Airport Precinct
	Jandakot Airport Holdings Pty Ltd is required to prepare a Master Plan every five (5) years pursuant to the <i>Airports Act</i> 1996. The current 2014 Master Plan was approved by the Minister for Infrastructure and Regional Development in February 2015.
	The current Master Plan identifies Mixed Business opportunities within Precincts 5 and 6 which abuts the 2ha 'Resource' lots contained within the Submission Area. The realisation of the Mixed Business development outcomes on the Jandakot airport land will reduce the amenity of these Resource lots, however would also create opportunities to identify alternative land use synergies that could benefit the long term operation and viability of the airport.
	Jandakot Airport Holdings Pty Ltd will commence a process of reviewing its Master Plan to meet the five year statutory review requirement, and therefore the City has an opportunity to align the timeframe of the preparation of the Master Plan with the preparation of its new local planning strategy to ensure land use planning of the precinct informs the preparation of the Master Plan and vice versa to maximise the opportunities for this Strategic Employment Centre.
	Jandakot Groundwater Resource
	We understand that the City has previously maintained the Resource zone over the precinct containing our Client's land as a way of protecting the integrity of the Jandakot Groundwater resource and on the basis of protecting remnant vegetation.
	However, as demonstrated in the Treeby District Structure Plan (TDSP) adopted by the City and approved by the Western Australian Planning Commission (WAPC), the integrity of the Jandakot Groundwater Mound can still be maintained through more intense forms of development and we note that the TDSP employed the following initiatives to achieve this:
	Extension of deep sewer to all lots;Implementation of water sensitive urban design

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		 principles including at-source stormwater infiltration, rain gardens and water harvesting; Preservation of large areas of existing native vegetation and wetland; Future urban design which incorporates the current trend for smaller lot sizes with reduced landscaping and irrigation areas; An on-going monitoring programme; and Exclusion of high risk land uses from the development area.
		This represents an improved environmental outcome in comparison to the current Resource zoned lots, which are reliant on on-site effluent disposal systems and on-site potable groundwater bores.
		We also note that the City's draft <i>Infrastructure</i> local profile paper states that the Jandakot Groundwater Supply Area only contributes approximately 3 percent of the metropolitan public scheme water supply and is only used to 'top up' the water supply obtained from other sources.
		3. Regionally Significant Vegetation
		We note that the submission area is not known to contain regionally significant vegetation as defined within State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region, as follows:
		 None of the land contained within the Submission Area Is identified as Bush Forever; Bushland within the submission area has not previously been identified as containing rare flora or threatened ecological communities; and The Submission Area does contain some identified wetlands, however these wetlands are either classified as 'Multiple Use' or 'Resource Enhancement' and are therefore not considered regionally significant wetlands.
		Based on the above, the vegetation contained within the Submission Area is not considered to be regionally significant.
		Locally Significant Vegetation
		The significance of the vegetation within the Submission Area has not previously been assessed by way of detailed site investigations. The City's draft local profile papers refer to the vegetation as having a landscape value in that it provides a visual buffer to the Jandakot airport. The provision of a landscape buffer to the airport is not specifically secured by the current 'Resource' zoning and it is noted that the vegetation is distributed across multiple lots under private landownership, which means that the opportunity for ongoing management of the vegetation is not able

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		to be regulated.
		The investigation of the Submission Area for future urban land use outcomes could identify opportunities to create better outcomes for the ongoing management of vegetation to provide a visual buffer to the airport while still allowing for employment generating land uses to occupy other portions of the Submission Area.
		<u>Wetlands</u>
		As previously identified, the Submission Area does not contain any Conservation Category Wetlands, however does contain a number of 'Resource' and 'Multiple Use' wetlands, which is characteristic of this locality. Further detailed investigations as part of an 'Urban investigation area' would need to investigate the values of these wetlands.
		Kennel Buffer
		The Submission Area is not affected by the nearby Kennel buffer and is therefore not subject to this constraint which does place a constraint on other 'Resource' zoned land located further east within the municipality.
		Precedent and the diminished Rural landscape quality
		We note that there are a number of precedents where the City has supported the inclusion of 'Resource' zoned lots into either an 'Urban' or 'Urban investigation area' under the strategic planning framework. Most recently, we note the Council's decision at its Ordinary Council Meeting held 14 September 2017 in considering the Treeby District Structure Plan (Item 15.8), whereby the Council resolved to:
		"13. The Skotsch Road precinct Resource lots being indicated as 'potential residential' (pending inclusion by the WA Planning Commission in the Perth and Peel @ 3.5 million documents), and if this eventuates Skotsch Road being appropriately connected and integrated with the broader TDSP area."
		This decision was made on the recommendation of City's officers, after the City surveyed the Skotsch Road landowners as to whether they would prefer to see their land remain as 'Resource' or rezoned to 'Urban'. Of the Skotsch Road landowners who responded to the survey, there was unanimous agreement to support an 'Urban' zoning over their land and this formed the basis for the City's recommendation to the Council.
		The rural landscape and lifestyle values previously enjoyed by the owners of the Resource lots has ultimately been degraded over time through the encroaching urban front, previous resource extraction activities, expanding Jandakot airport operations and industrial and business development.
		These values will only be further undermined in the future as a

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		result of the expansion of Airport land uses, such as the Mixed Business development proposed to abut the northern boundary of the Submission Area and through the further expansion of Treeby estate.
		The changing landscape around the Submission Area and the diminished Rural landscape quality and lifestyle provides a basis for the need to review the future character, role and land use function of the Submission Area. The most appropriate way for the City to facilitate this would be to identify the area as an 'Urban investigation area' within its future local planning strategy to allow the landowner group to commence a process of reviewing alternative land use outcomes or scenarios for the area. Conclusion
		We trust that the above submission and detailed comments on the draft local profiles contained at Attachment B provides constructive feedback so that the City can further develop its local planning framework, particularly in relation to the ongoing and future role of the Submission Area. We would welcome the opportunity to meet with the City to discuss the justification for identifying the Submission Area as an 'Urban investigation area' in further detail.

ADDITIONAL COMMENTS (TPG + Placematch) Please find below specific comments made in relation to the draft local profile papers.

Extract from Local Profile Paper	TPG + Placematch comment on statement
Rural land use, subdivision and development Places a high level of value on the rural and environmental landscape of the Rural Water Protection zone area.	The rural amenity of the Submission Area has already been significantly undermined through previous approved urban encroachment, the current operations of Jandakot Airport and the associated industrial and business uses. Further impact on the amenity on these 'lifestyle' lots is expected to occur through the additional subdivision and development within Treeby estate and through the expansion of the operations of Jandakot airport, including the establishment of a new Mixed Business precinct on the northern edge of the submission area. The local profiles should acknowledge this issue in greater detail.
Key issues highlighted by this draft local profile paper to be addressed by the future LPS include: Maintaining the rural, natural bushland and environmental landscapes of the Resource zone above the Jandakot groundwater	As previously stated, these are policy statements that have been formed prior to the preparation of the local planning strategy and should be removed from the final local profile paper to provide the opportunity for the future local planning strategy to take a holistic approach to the development of strategies to

- mound, through strict land use and development control;
- Preventing any further sand mining activities within the Resource zone, that destroy the elevated bushland sand ridges that run through the area;
- Preventing any further subdivision within either the Resource zone or the Rural zone. Subdivision within the Resource zone causes fragmentation of the natural environment, with the likes of driveway, firebreak, building envelopes and bushfire requirements. This impact of the natural environment, and the extensive network of wetlands that exist, directly threatens the Jandakot groundwater mound and further introduces pressure for development to occur; and
- Ensuring the expectation of landowners within rural areas matches the strategic intent of such areas – i.e. that is for the natural landscapes of the Resource zone to prosper.

address land use requirements of the Jandakot Strategic Centre in combination with landscape, environmental and groundwater issues.

Additionally, these statements are inconsistent with the recently released Perth and Peel Sub-Regional Planning Framework which identifies the Submission Area as a 'Planning Investigation Area' which provides for further detailed investigations to be undertaken to determine whether there is potential for land use change in the area.

Opportunities for and constraints upon development

Opportunity to leverage higher and better land use outcomes for land that is proximate to the developed transport and industrial infrastructure which exists at the airport.

Jandakot airport is a constraint for any consideration to intensify development of sensitive (residential) land use.

Constraint for removing natural buffers which exist currently on land surrounding the airport, as a way of helping to limit the visual impact of the airport on the broader surrounding

We support this statement and are of the view that the Resource zoned land in proximity to the airport should be identified as an 'Urban investigation area' to allow the necessary detailed investigations to be undertaken to determine whether the land is suitable for alternative employment generating land uses that are complimentary to the operation of the Jandakot airport precinct.

We acknowledge that land located in areas between 20 ANEF and 25 ANEF and areas above ANEF have limitations with respect to permitting sensitive land uses such as residential subdivision, however employment generating land uses such as industrial, business or commercial outcomes are not sensitive and may be compatible with the airport operations and actually contribute to the long term viability of Jandakot airport.

We note the requirement to retain remnant vegetation immediately adjacent to the airport site as a way of providing a visual buffer to surrounding land uses. However this should not in itself preclude the ability to explore

community.	alternative land use outcomes for the
	remainder of the Resource zoned land
	surrounding the airport.
Constraint to any further intensification of development when considering the bushfire risk associated with areas of bushland.	Noted. As per our submission, any detailed investigation into alternative land use outcomes for the 'Resource' precinct will need to be supported by a bushfire hazard assessment.
Physical features and Natural Resource Management The retention of regionally and locally significant bushland.	In accordance with the criteria identified in State Planning Policy 2.8, the vegetation contained within the Submission Area is not regionally significant for the following reasons: - It is not identified as Bush Forever; - It has not previously been identified as containing rare flora or threatened ecological communities; and - It does not contain regionally significant
	wetlands. The local value of the vegetation has not been quantified. It may have an aesthetic value and visual buffer value.
	Vegetation within the 'Resource' zoned land within the Submission Area is also distributed across fragmented landownership and ongoing management and maintenance of this vegetation is not formalised in any way.
	By undertaking further detailed site investigations to investigate potential land use alternatives for the Submission Area, opportunities may be identified to better manage and conserve areas of vegetation for the longer term.
The need to balance the operational needs of the Jandakot Airport with the amenity expectations of sensitive land uses and physical environmental constraints.	The rural amenity of the Submission Area has already been significantly undermined through previous approved urban encroachment, the current operations of Jandakot Airport and the associated industrial and business uses. Further impact on the amenity on these 'lifestyle' lots is expected to occur through the additional subdivision and development within Treeby estate and through the expansion of the operations of Jandakot airport, including the establishment of a new Mixed Business precinct on the northern edge of the submission area. The local profiles should acknowledge this issue in greater detail.
Population and Housing	Noted. However, it does not necessarily
This document recognises the	preclude the ability to investigate alternative

Jandakot Groundwater Protection
Policy Area and Jandakot Airport
ANEF noise contours as constraints to
development of more housing in the
eastern corridor of the District.

non-sensitive land uses that may be compatible with and complimentary to the operations of the airport.

Traffic and Transport

Recognises the critical need to develop further non-aviation land around Jandakot airport to the future delivery of aviation and environmental outcomes to secure strategic diversity of income and long term viability of the airport.

We support this statement however note that there is limited zoned land currently available to accommodate businesses that are required to locate in close proximity to the airport. We therefore suggest that an 'Urban investigation area' be identified for land surrounding the airport in order to establish a process to undertake detailed investigations to identify any land that may be suitable to accommodate additional employment generating land uses to secure the long term viability of the airport and also to contribute to the City's employment self-sufficiency targets.

Water Management

Urbanisation has been a particular pressure with areas of groundwater protection reduced, such as in the case of the new Treeby estate.

Urbanisation over the Jandakot groundwater mound has already been supported previously, with the Treeby District Structure Plan as an example, and the City recently supporting a request to recommend to the Western Australian Planning Commission that the Resource zoned lots on Skotsch Road be also included in the Urban zone.

This urban outcome over the Jandakot groundwater mound has already been supported by State and local government, and this decision has impacted on the Rural and lifestyle amenity once enjoyed by landowners within the Resource zone.

The local profile should expand on this issue and acknowledge that there may be an opportunity to investigate alternative land use scenarios for the remainder of the Resource zoned land around the Jandakot airport.

Economy and Employment

The Jandakot airport is identified as a Strategic Employment Centre within the City and these centres are forecast to contain more of the future jobs in the City. This is due in part to land availability.

We note that land zoned to accommodate future employment generating land uses is limited in and around the Jandakot airport and therefore we support identifying the Resource zoned properties surrounding the airport as an 'Urban investigation area' to facilitate the undertaking of more detailed investigations to determine land that may be appropriately rezoned to accommodate additional employment generating uses that would contribute to the viability of the Jandakot airport Strategic Employment Centre and also to the employment self sufficiency targets identified for the City.

Infrastructure

It is noted that the on-site effluent disposal of

Attachment One – detailed submissions – Local Profile Papers

There is no infill sewer in the City's 'Resource' and 'Rural' zoned areas, and these areas rely on the installation of onsite effluent disposal systems.	the Resource zoned properties is not an ideal outcome for maintaining the quality of this public drinking water supply. A more urban land use outcome would allow for the extension of reticulated sewerage, and in combination with other measures, could actually improve the quality of the public drinking water supply.
'Resource' and 'Rural' zoned properties are serviced by on-site potable groundwater bores or a rainwater supply.	As per above, a more urban land use outcome for the Resource precinct would facilitate the ability to extend reticulated water into this area which would represent an improved outcome for the public drinking water supply.
The Jandakot Public Ground Water Supply Area currently contributes approximately 3 per cent of the metropolitan public scheme water supply.	It is noted that the Jandakot Groundwater Mound is used to 'top up' the Perth public water supply primarily secured via other sources. Notwithstanding, a more urban outcome in place of the current Resourced zoned properties would potentially allow for a greater rate of recharge of the groundwater mound.
Private abstraction of this groundwater resource is substantial, supporting a range of industrial, rural, special rural and domestic uses.	Urban use of the Resource zoned properties would not compromise the abstraction rates of the groundwater resource and may actually assist in replenishing the groundwater resource as noted above.