

Enquiries: Jane O'Malley
Our Ref: 0058_2015_2708_JO



28 August 2015

Perth and Peel @ 3.5 million
Department of Planning
Locked Bag 2506
PERTH WA 6001

Attention: Project Manager

Dear Sir /Madam

Peel-Harvey Catchment Council's Submission to the Draft South Metropolitan Peel Sub-Regional Planning Framework (May 2015)

Thank you for the opportunity to provide a submission on this major Plan.

The Peel-Harvey Catchment Council (PHCC) acknowledges the significant government investment in the development of this Sub-regional Planning Framework (the Framework), and the related Strategic Assessment of the Perth and Peel Regions (SAPPR). These linked initiatives provide a once-in-a-generation opportunity to better protect the environment and natural resources of the Peel-Harvey Catchment, particularly our internationally recognised Ramsar system and Biodiversity hotspot as well as create a more liveable Peel Region.

Our submission presents a number of major comments in the attached pages, followed by a table of comments linked to the draft Framework report (Table 2).

As stated in our submission, we look forward to the opportunity to review the draft Plan once all documentation related to SAPPR is released later this year. It is important that this occur to ensure the integrity of the Sub-regional Planning Framework and its robustness over coming decades. This will provide all stakeholders with the greater certainty that they expect from the Sub-regional planning and SAPPR processes.

Should you require further information, please do not hesitate to contact our CEO, Jane O'Malley on (08) 6369 8800 or email admin@peel-harvey.org.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jan Star', with a flourish at the end.

Jan Star AM
Chair

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Major comments (A to S)

A. Objective to contain urban growth is strongly supported

The PHCC acknowledges that the Plan seeks to shift Perth-Peel away from a largely expansive, low density urban growth model towards a more consolidated, mixed-density urban form. This approach is strongly supported and can achieve social, economic and environmental benefits. All arms of government will need to be proactive and consistent to ensure consolidated urban areas are highly appealing and offer significant advantages to residents (in contrast to living in low density suburbs). The PHCC strongly supports consolidation around existing centres including Mandurah, Armadale, Rockingham, Maddington, Cockburn, Kwinana, Pinjarra, Byford, and Mundijong. The promotion of Ravenswood Riverfront to a secondary centre is not supported. (See Comment E below). A consolidated urban form is highly dependent on fast, reliable public transport, including light and heavy rail.

B. Greater emphasis on planning for public transport is recommended

Many of the objectives of the Plan, especially urban consolidation, economic development and creation of vibrant centres and corridors are dependent on good public transport planning and provision. The Framework needs to significantly strengthen the measures that government is to undertake as a priority to plan the routes, modes and corridors for fast and efficient public transport. This includes the development of a comprehensive public transport plan for the Perth and Peel regions, and a commitment to embed future transit corridors into the planning framework. Government should be assured that well planned and implemented public transport initiatives world-wide are being better used and managed to achieve social and economic benefits.

C. Containment of urban development between the Peel-Harvey Estuary and Forrest Highway is strongly supported

The land south of (Austin Lakes) is not suitable for urban development given its proximity to the Estuary conservation reserves and waterbody and that it is within storm surge areas under projected sea level rise (Figure 1).

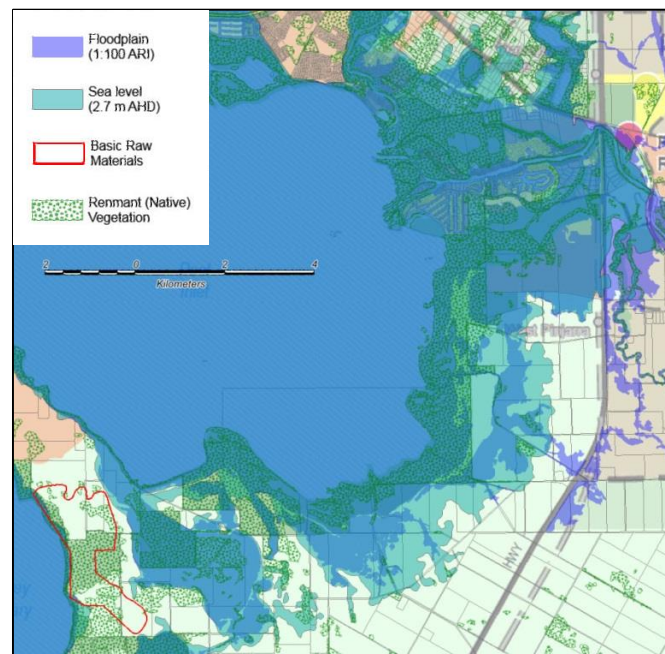


Figure 1: Projected floodplain and sea level rise area. Note area of regionally significant Basic Raw Materials over native vegetation (red line)

D. The phasing out of rural residential land use is strongly supported

The removal of approximately 2,000 ha of potential rural residential lands is strongly supported. Rural residential land is an inefficient land use and is known to exacerbate environmental problems such as nutrient export, weed dispersal, and results in long-term loss of native vegetation and biodiversity where it occurs on vegetated areas. As the Plan demonstrates, there is existing zoned land for this purpose. Government is strongly encouraged to completely phase out any new zoning of land for this purpose in the Perth and Peel regions.

E. Proposed urban expansion cells north and south of Ravenswood, east of Forrest Highway are not supported and should undergo a separate public review

The PHCC is concerned that the proposed urban expansion areas north and south of Pinjarra Road around Ravenswood will lead to poor development outcomes, limited opportunities for residents and undermine the development of good public transport options. The identified land is low-lying, palusplain country and will require significant fill to raise it above groundwater levels. The land's most noticeable feature is that it abuts the Forrest Highway, and will make residents reliant on a freeway system that is already jammed at peak periods. While the urban expansion plan is linked to the Ravenswood Riverfront becoming a large centre, the promotion of Ravenswood Riverfront to a secondary centre is not supported.

The proposed urban expansion cells north and south of Ravenswood represent the type of urban sprawl which Perth-Peel can no longer afford, and will likely lead to future pressures to continue expansion into the balance of the palusplain. It is worth noting that the EPA in its recent interim Section 16(e) advice on Perth and Peel @ 3.5. million, acknowledged that the removal of Keralup from future development plans was significant in preventing further urban sprawl (EPA, 2015). It is important that this significant achievement is not un-done by replacing it with sprawl north and south of Ravenswood. In this regard, the EPA also points out that:

“The sub- catchments in which these (Ravenswood and West Pinjarra urban developments) are located are already experiencing very high nutrient flows into the rivers and estuary. This is particularly significant for the Nambeelup Brook sub-catchment, which has very poor phosphorus retention and already discharges high loads of phosphorus to the Serpentine River, the lower reaches of which are under considerable ecological stress and experience regular algal blooms and fish kills.”
(EPA, 2015)

The PHCC requests public discussion of a more consolidated development corridor between Mandurah and Pinjarra, (instead of the proposed Ravenswood option), where the two towns are connected by a dedicated public transport corridor, preferably light rail or heavy rail. This plan would include higher densities in and around Mandurah to achieve the projected dwelling numbers, and mixed densities around key parts of the corridor where additional amenity is offered by the Murray River. The PHCC understands that such a discussion is supported by local governments.

F. Various other urban/industrial expansion cells or public purpose areas not supported or queried

The following proposed development areas are not supported:

- i. Two individual urban expansion cells between Byford and Mundijong (between Tonkin Highway extension and Perth-Bunbury Railway). These areas should remain as rural or rural residential to preserve the rural landscape buffer between the two towns. Urban development between the Byford and Mundijong encourages urban sprawl and eventual continuous urban development from Armadale to Mundijong.

- ii. Proposed urban area west of the proposed Tonkin Highway extension, between Byford and Mundijong. This area, if developed, would be the first urban area west of the Highway and create an isolated, poorly serviced community west of a major highway.
- iii. Industrial investigation area south of Mundijong Road in middle of palusplain. There is no other industrial area around this site, proposed or current, and the creation of a new industrial area here will prejudice future rural development and agricultural production options.
- iv. Urban expansion area in Mundijong on intersection of Watkins Road and South West Highway. Productive agricultural land on Medulla Brook valley, landscape sensitive.
- v. Proposed Public Purposes area for a cemetery in the south west of the Keralup area. This site is low-lying palusplain country in close proximity to the Serpentine River System. Development for cemetery purposes is not appropriate given that burials and gardens will be in close proximity to the river and groundwater, facilitating nutrient movement into the Serpentine River system and Peel-Harvey Estuary.

G. Average residential densities targets need to be reviewed and increased

Increasing building density is strongly supported for the range of benefits - environmental social and economic - that it delivers. The environmental benefits include less clearing of native vegetation and wetlands, less energy use, and significant reduction in nutrient leaching due to the smaller size of fertilised gardens and lawns.

The attached graph (Figure 2) shows the results of work by the Department of Water on nutrient input rates of different land use types. The figure shows that urban development with average lot sizes below 400 m² is likely to meet the water quality target for phosphorus for the Peel-Harvey Estuary as set by the EPA. (The phosphorus target of 6.5 kg Phosphorus/hectare/year is represented by the red line in the graph). Urban development of average lots sizes 601 – 730 m² inputs phosphorus at rates four times more than that the maximum allowed to protect the Estuary’s water quality. This is of significant concern given that much of the proposed urban development in the Framework is at, or around, this density.

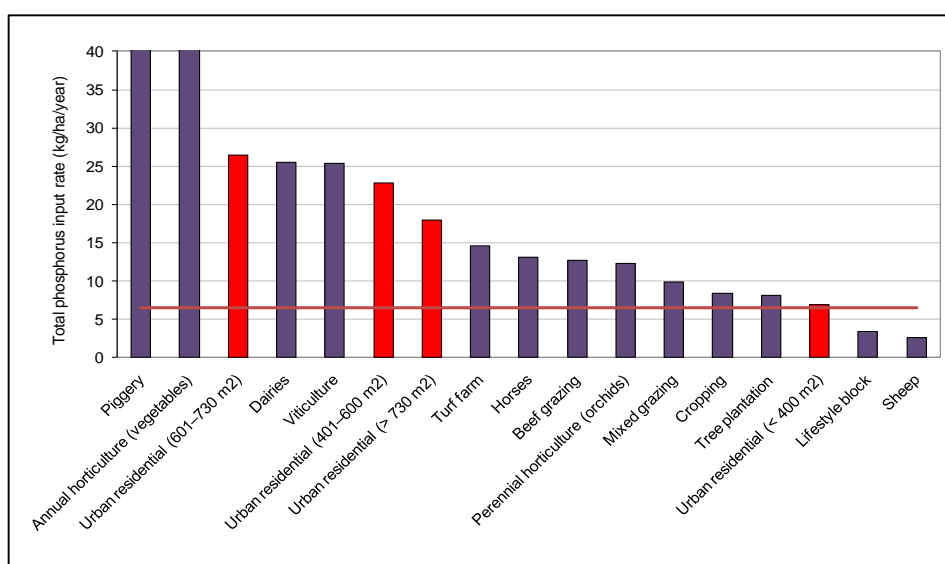


Figure 2: Phosphorus input rates for different land uses (Department of Water, 2010)

While acknowledging the effort to increase gross residential densities to 15 dwelling per gross hectare (currently around 10 dwellings/gross hectare), further work is required to identify where densities can

be further increased to reach an average gross density of 20 dwellings/ha. Opportunities exist in Mandurah, along the Pinjarra Road corridor linking Mandurah and Pinjarra, and the Perth-Mandurah railway. Other opportunities to support higher densities in the existing Perth Metropolitan area should also be vigorously pursued.

Key to successful increased densities are good access to public transport, good building design, provision of high-amenity streetscapes and activity centres, protection of natural areas in proximity to residences and provision of well-developed parks and recreation areas.

H. Current identification of Basic Raw Material (BRM) sites is not supported

The PHCC has significant concerns over the proposals for Basic Raw Materials supported by the Framework, and in particular, a number of the identified sites of ‘Regionally Significant Basic Raw Materials (Plan 8).

Preliminary analysis by the PHCC shows that proposed regionally significant BRM sites cover 2,320 hectares of native vegetation, including 2,030 hectares of banksia woodland, 1,775 hectares of regionally significant natural areas, and eight (8) recorded populations of six (6) threatened species.

The significance of this issue warrants separate public discussion and assessment. The PHCC is also concerned that the identification of BRM in the Framework is ‘*not consistent with those areas under consideration in the Strategic Assessment of the Perth and Peel regions*’ (EPA, 2015).

There is little detail made available in the Framework on how these sites have been selected, and the criteria that have been used to assess the relative worth of BRM and environmental values (at each site). There is an immediate concern that a number of the proposed regionally significant BRM sites are on well vegetated sites, often where no other bushland remains, with some in immediate proximity to the Peel-Yalgorup Ramsar Site and within an internationally recognised Biodiversity Hotspot. The PHCC requests more detailed information and public consultation prior to government progressing any of the plans linked to Basic Raw Materials. Figures 3 and 4 provide examples of BRM sites over large areas of native vegetation.

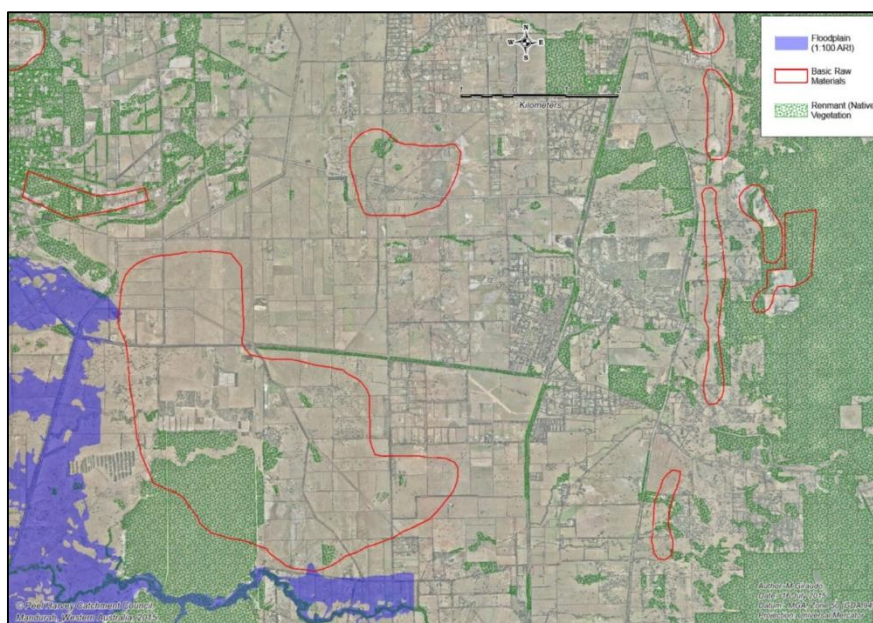


Figure 3: Proposed regionally significant Basic Raw Material sites, Shire of Serpentine-Jarrahdale

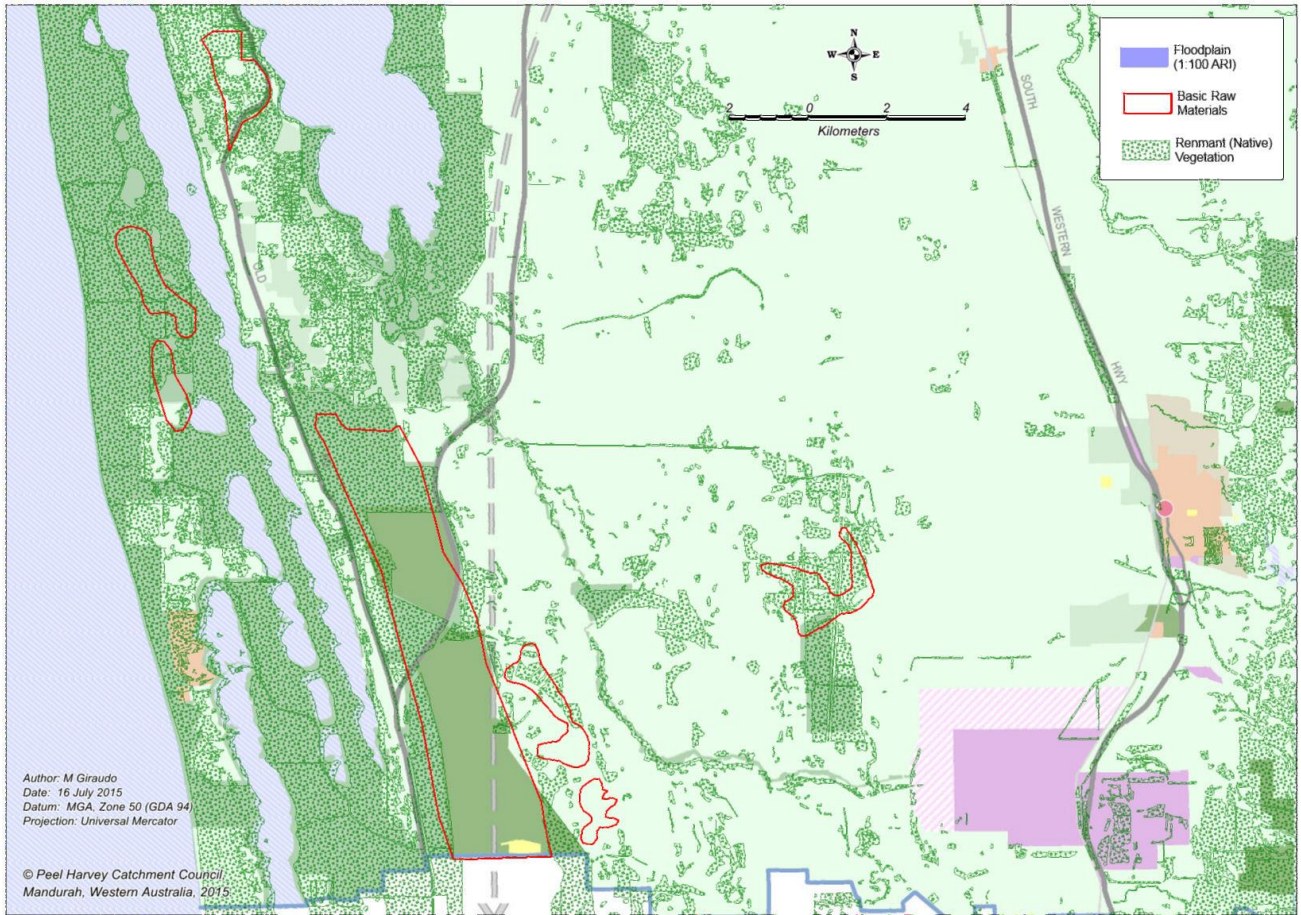


Figure 4: Proposed regionally significant Basic Raw Materials areas, Shire of Waroona

I. Recognition of protection of the Peel-Yalgorup Ramsar System positive and an ongoing challenge for planning

The PHCC is pleased to see multiple references to the Ramsar System in the Framework document, and looks forward to protection of Ramsar values being an objective of all stages of future planning.

J. Peel Regional Park proposal needs recognition in the Planning Framework

The Plan needs to recognise previous commitments of government to create and gazette the Peel Regional Park. Recognition also needs to be made of the proposed extensions to the Peel-Yalgorup Ramsar System, namely Black and Goegrup Lakes. Further details can be provided by the Department of Parks and Wildlife or PHCC.

K. Catchment water quality targets and drainage need to be directly incorporated into the Framework, and subsequent plans

The Department and WAPC are to be congratulated in highlighting the link between proposed development and the protection of the Peel-Harvey Estuary, especially water quality. However, the Plan needs to link all development performance to the targets in the Water Quality Improvement Plan (WQIP) for the Rivers and Estuary of the Peel-Harvey System – phosphorus management (EPA, 2008), and any subsequent government endorsed targets. The WQIP confirms water quality improvement targets for the Estuary require a halving of the loads of phosphorus entering catchment waterways (i.e. phosphorus pollution loads are currently twice that which is required to restore the Estuary to a healthy ecosystem). Catchment modelling by the Department of Water (Kelsey et al, 2010), shows that very significant changes to urban development densities, in parallel with changes to rural practices, are required to achieve the water quality improvement targets for the Peel-Harvey Estuary.

The Plan does not currently reference the WQIP or its targets to enable objectives to be met. These targets can be used to hold government and developers accountable to high standards of development and water sensitive design. It is encouraging that the Plan states very clearly that ‘Ongoing improvement and effective management of this drainage network will be necessary to assist in reducing nutrient and sediment export within the Peel-Harvey Catchment area’. However, a new implementation action is required to make this statement reality, and support significant reform in arterial drainage (not just piecemeal changes to feeder drains). See Table 2, Comment 55.

L. Proposed Keralup open space strongly supported

The long-term use of this land for open space, recognising its environmental constraints and opportunities, is strongly supported. The site is of strategic environmental significance, and of limited value for urban, industrial or other intensive development given that it is mostly low-lying wetland. Open space development of the site should focus on water quality improvement, restoration of habitats, revegetation and passive recreational opportunities for the Peel region. This site is a significant community asset and provides opportunities to assist with social and environmental objectives as defined.

M. “Open Space Investigation’ land category needs to be defined and explained

The PHCC welcomes the identification of areas of Open Space Investigation, including public lands in the Keralup area. However, the document does not provide a definition of what the Open Space Investigation land category may mean, and how it will be implemented. Given that it is a relatively new and uncommon designation, further detail is required in the Plan to demonstrate how this land will be further investigated, and added to the public open space estate in the future.

N. Support for the extensions to the Yalgorup National Park

The protection/conservation of the enclaves within the Yalgorup National Park is strongly supported.

O. Identification of Peel Regionally Significant Natural Areas is required on maps

The PHCC is disappointed that Plan 8 does not show the ‘Peel Regionally Significant Natural Areas’, but has shown ‘regionally significant Basic Raw Materials. This is an omission which undermines the integrity of the Framework and has important consequences for the achievement of the Plan’s environmental objectives. The PHCC notes that the EPA, in its interim strategic advice, has recommended that the State Government take practical measures to protect and manage Peel Regionally Significant Natural Areas (EPA, 2015), this is supported.

P. Identification of other proposed conservation areas to be protected through SAPPR process is required.

The PHCC acknowledges the positive conservation and environmental proposals that will be achieved through the Framework, such as protection of lands in the Yalgorup National Park and Keralup. However, there is a significant gap in the Framework in relation to protection of other regionally significant natural areas, such as the protection of Peel Regionally Significant Natural Areas (PRSNA) as identified by the Environmental Protection Authority (EPA, 2013) and other areas of outstanding biodiversity and landscape value. This is a fatal flaw of the sub-regional Framework, and prevents stakeholders and members of the public from understanding the merits or otherwise of the Framework.

Q. The proposed loss of bushland and wetlands is of significant concern, and needs to be made transparent, and mitigation measures incorporated into all planning tiers

Remaining bushland and wetland in the coastal catchment of the Peel-Harvey Estuary play a fundamental role in maintaining current levels of biodiversity, contribute towards water quality improvement of catchment rivers and Estuary and are of significant social significance. Despite government’s efforts to contain the proposed development footprint, it is estimated that 2,519 hectares of native vegetation would be cleared in the sub-regional area as a result of current and proposed development (Table 1).

Table 1: Project loss of native vegetation due to implementation of proposed Framework

	Total (ha)	Native Veg (ha)	Current % of native vegetation	Projected Loss of native vegetation due to development	Projected Loss (ha)
Commercial	464	5	1%	-	
Industrial Current	611	48	8%	3%	30
Industrial Expansion	1,989	183	9%	3%	123
Industrial Investigation	972	49	5%	3%	19
Sub Total (Industrial)	3,571	280	8%	5%	172
Mine Current	3,200	285	9%	7%	61
Mine Expansion	1,995	202	10%	7%	62
Sub Total (mines)	5,195	487	9%	2%	124
Rural Residential	14,460	3,113	22%	15%	944
Urban Developed	7,662	604	8%	7%	67
Urban Undeveloped	9,242	1,515	16%	4%	1,146
Urban Expansion	3,881	220	6%	4%	65
Sub Total (urban)	16,904	2,119	13%	8%	1,278
Total	40,595	6,005	15%	6%	2,519

This is in addition to the possible loss of a further 2,320 hectares of native vegetation which occurs on sites which are shown in the Framework as regionally significant basic raw materials.

The proposed road across Black Lake is strongly opposed. This Lake is part of the Ramsar extensions and has significant cultural values that should be protected. The impacts of a road through this Lake would be significant and contrary to the statements for environmental protection.

The Peel-Harvey Catchment Council strongly opposes any further loss of native vegetation in the Catchment. This position is supported by the work of state government agencies, such as the Eastern Estuary Environmental Assessment (EEEA) which stated:

“It should be noted that, particularly south of the Perth Metropolitan Region (PMR), the EEEA study area and the Bioplan study area have been extensively cleared of native vegetation and, as there is so little native vegetation remaining, it can be considered to be all regionally significant because the target for representativeness can rarely be met”. (Keighery et al, 2006).

The PHCC is not aware of any biodiversity impact mitigation¹ arrangements that will accompany this proposed significant loss of vegetation. This vegetation performs biodiversity conservation AND water quality improvement functions, which are difficult, if not impossible to replace.

Without pre-empting the PHCC’s comments on the SAPPB proposals, strong measures are required to minimise, manage, and mitigate this impact on biodiversity and water quality, within each subcatchment in which the impact occurs. These include significant opportunities for strengthening ecological linkages throughout each subcatchment (See Comment Q below).

It would be of assistance to see the Framework define and use the term ‘biodiversity’ and set objectives for biodiversity conservation, as appropriate to the planning context.

R. Proposed Rural Conservation zone or similar

It is important that the Framework include a category for the protection of rural areas with significant conservation or other environmental values, for example floodways and significant bushland and wetland areas. These areas are currently afforded little protection through the planning system, even though environmental laws and policies place significant restrictions on their development and intensive land use. It is appropriate that the planning system start to reflect these important environmental values through spatial classifications. A Rural Conservation land category could include private lands in local conservation zones, such as the Shire of Serpentine-Jarrahdale Conservation Zone, and severely constrained lands such as floodways associated with major river systems. Private lands in local conservation zones should not be designated in the Framework as ‘Open Space’ as this may imply some current or future public access.

S. Implementation mechanisms for ecological linkages are required

The recognition of ecological linkages on Plan 8 in the Framework is to be congratulated. However, the Framework does not demonstrate how the integrity of these linkages will be protected throughout the forthcoming stages of planning. For example, in the recently produced draft Nambeelup District Structure Plan, the recognised ecological linkage was also identified as the corridor for major services, thereby removing its usefulness as an ecological corridor.

¹ The term ‘biodiversity impact mitigation’ is often referred to as ‘biodiversity offsets’. Biodiversity loss cannot be offset, and the more accurate term ‘biodiversity impact mitigation’ is used here to reflect this reality.

Linkages and greenways have now been identified for many years in various government documents, but local and state government agencies have struggled to get traction when trying to implement them through the planning system. Practical measures are required within the planning system to ensure that linkages are adequately planned to fulfil their function as ecological corridors, and support appropriate recreational and water management functions where possible. Ideally, linkages should be continuous and connect protected natural areas.

T. Current treatment of southern palusplain not supported: greater recognition of food production values needed

The large areas of rural zoned land in the palusplain, both north and south of the Mandurah – Pinjarra axis require more proactive statutory planning to protect and support agricultural and food production capacities. Retaining this largely as rural zoned land is not sufficient to protect its food production values. The creation of isolated industrial areas in the palusplain (e.g. on Mundijong Road) will also establish a precedent for future expanded use of the palusplain for non-rural uses. The State and local government are recognising the food production values of the palusplain, and selected areas, through initiatives such as the Peel Food Zone and efforts to ensure that future production systems are ‘catchment friendly’. There is greater urgency to address planning of the palusplain area between Oakford and the Murray River due to competitive use pressures. Options to support proactive planning for food production could include a special control area over the southern palusplain, or identification of precincts within the palusplain. Any planning mechanism needs to manage the importance of the palusplain for agriculture and catchment water quality.

U. Public should be given opportunity to comment on the draft sub-regional Framework once the SAPPB documentation is released

In recognition of the connections between the sub-regional planning frameworks and the SAPPB process, the PHCC requests the opportunity to re-visit the draft Planning Framework once the SAPPB documentation is released for public comment. This request is made as it is not possible to assess the various implementation measures associated with the SAPPB process that will accompany the implementation of the proposals within the Framework. For example, there is little detail in the public domain to assess the impact of the proposed development footprint on bushland, native species, water quality and the Peel-Yalgorup Ramsar System.

Table 2: Detailed comments on the Southern Perth-Peel Sub-regional Planning Framework

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
1.	p5	Stated aim to increase residential density and urban infill targets	Increased urban density and infill targets are strongly supported, but should be increased further	A target of 15 dwellings/gross hectare is questioned. This target should be increased through additional urban consolidation of brownfield sites, and yet developed urban zoned lands, especially in centres such as Mandurah and Rockingham, along existing rail corridors, and in the inner Perth suburbs.	G
2.	p6	Aspiration to ' <i>protect areas with regional conservation and landscape value</i> '	Protection of regionally significant natural areas is strongly supported	The Framework does not demonstrate how this will be done, except for significant examples such as additions to Yalgorup National Park. The public is also unaware of the additional natural areas that may/may not be protected through SAPP process. The PHCC has estimated that over 500 ha of identified regional significant bushland would be cleared as a result of development as proposed in the Framework.	O and P
3.	p6	State aim to ' <i>encourage and guide increased connectivity between areas of open space or conservation through an integrated green network</i> '	Increased connectivity between open spaces and conservation areas is strongly supported	As stated in Comment Q: Implementation mechanisms for ecological linkages are required	S
4.	p6	Stated aim to ' <i>retain land for rural purposes</i> '	Aim is too weak and broad	Rural lands need greater protection and more proactive planning. These need to have planning recognise their importance and function in their own right. Providing great guidance on land uses in the southern palusplain, which extends from Oakford to the southern extent of the SRSP is important and should be included as a specific proposal within the Plan.	T
5.	Could be included on page 6	New aspect recommended: ' <i>Protect the productive capacity and potential of the</i>	New aim to be included on page 6	The southern palusplain, from Oakford and Mundijong to the southern extent of the Sub-regional area supports a significant agricultural sector including poultries, piggeries and vegetable	T

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
		southern Metro and Peel subregion		farms, with production valued at \$125 million pa in 2011/12 (Department of Regional Development, 2014) New aspect recommended: 'Protect the productive capacity and potential of the southern Metro and Peel subregion'	
6.	p12	Stated method that the Spatial plan has been shaped and refined by numerous key considerations, including a ' <i>detailed examination of significant environmental values, as described by the Department of Parks and Wildlife and Environmental Protection Authority</i> '	Concern that the examination is not publicly available, and the definition of 'significant environmental values' is not provided	A. This comment relates to a number of major comments in this submission, namely Comments O and P, and S: Public should be given opportunity to comment on the draft sub-regional Framework once the SAPPR documentation is released	P, Q, and U
7.	p12	Stated commitment that <i>The outcomes of this work (the SAPPR documents) will be reflected in the final sub-regional structure plans (where appropriate)</i>	This commitment is strongly supported. The final subregional structure plans must be able to be modified following the outcomes of the SAPPR process.	It is of concern that stakeholders and the public have been asked to comment on the SRSPs without information on the environmental management commitments that will be proposed to accompany the sub-regional structure plans. While the PHCC acknowledges the complexity of the SAPPR process, it requests that an additional public comment period on the sub-regional structure plans be provided once the SAPPR documentation is released for public comment.	U
8.	p13	'Other regional initiatives' listed on Page 13	The list of 'Other regional initiatives' omits any key initiatives which environmental guidance.	The list should include at least 2 of the major environmental initiatives that have been used/ should be used to ensure the Framework meets its environmental protection objectives. Key regional environmental initiatives include: <ul style="list-style-type: none"> Swan Bioplan (Peel Sector) Study (EPA, 2013) 	-

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
				<ul style="list-style-type: none"> Peel-Yalgorup Ramsar System Management Plan (PHCC, 2009) Peel-Harvey Natural Resource Management Strategy (PHCC, 2015). 	
9.	p15	The framework's aims	Aims should also including protecting the productivity capacity of the sub-region (food production)	See Comments 4 and R	T
10.	p16	Key planning framework principles <i>'Within the sub-region there is a wealth of environmental attributes...'</i>	Congratulate the WAPC in recognising the Peel-Yalgorup Ramsar site in the Plan	NA	-
11.	p16, para 1	<i>'Within the sub-region there is a wealth of environmental attributes...'</i>	The stated environmental attributes imply that native vegetation outside of national and regional parks is not of environmental value	The statement could be changed from " <i>..the coastline, the Ramsar-listed Peel-Yalgorup wetland system, several national and regional parks that encompass banksia woodlands and support habitat for flora and fauna</i> " to <i>'the coastline, the Ramsar-listed Peel-Yalgorup wetland system, several national and regional parks, and significant bushland and wetlands that support habitat for flora and fauna'</i>	-
12.	p16 point 3	<i>'limited support for new rural residential development'</i>	Strongly supported	-	D
13.	p16, dot point 4	<i>'provide effective and sustainable management of water resources'</i>	Strongly supported, but stronger head-of power instruments required	The Better Urban Water Management Framework has been a large step in the right direction to better management of water resources. However, stronger measures are required in the Peel-Harvey Catchment to improve water quality.	K
14.	p16	The key principles give little protection of the	The southern palusplain is of key importance for	A new 'key principle' should be included to the effect of: <i>Protect the agricultural and food production capacity of areas</i> .	T

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
		productive capacity of the area's soils and landscapes.	agriculture and improvement of the area's water quality.		
15.	p18	Consolidated urban form	Strongly supported.	The Peel-Harvey acknowledges that government agencies have collectively worked hard to reduce the possible future urban footprint (from what may have been anticipated by some stakeholders). Further work in this area is required as described in Comments A, B, C, E and F	A, B, C, E and F
16.	18	Strategic direction and priorities	No mention is made of the off-site impacts of sourcing fill for development in much of the sub-region.	As indicated elsewhere in this submission, there are significant concerns over the amount of land which supports bushland and is identified as regionally significant basic raw material sites. The Plan needs to clearly state that a consolidated urban form will mean less need for fill, and less need to clear native vegetation for fill (as well as numerous other environmental, social and economic benefits).	H
17.	p20	Urban expansion/investigation	The PHCC does not support the proposed north-south urban expansion area to the east of the Forrest Highway	This large urban expansion area north and south of Pinjarra Road is referred to as 'Ravenswood – West Pinjarra' in the Plan. See Comment E	E
18.	p20	Urban infill	Urban infill (established urban areas) is strongly supported, but state and local government need to proactively work towards good outcomes	Policies to support good design and amenity in urban infill development appear to be lacking/ or are not implemented. People are more likely to move to higher density areas where they are provided with good public transport options, enhanced streetscapes, parklands, walk trails, urban forests, and facilities within ped-sheds.	G
19.	p20	Urban infill	Support principles for urban consolidation are included, but mechanism for	The Plan is unclear as to how local governments will be supported to work towards the infill targets, and ensure infill development is high quality, provides high levels of amenity, is well connected to public transport.	G

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
			identification of infill areas and densities needs to be made clearer.		
20.	Central Sub-regional Planning Framework report, p19, figure 4	Green network definition	Definition supported, except that it should also include drainage corridors or waterway corridors.	The implementation of water sensitive urban design necessitates greater support for 'living streams', whether they are included in local parks, foreshores, or are entirely separate entities. The definition of green network should include the terms, living streams and multiple-use corridors.	S
21.	p22	Rural residential “ identification of new rural residential areas is unlikely to be supported	Strongly supported.	Rural residential is inefficient use of land within the sub-region, and is providing little environmental protection (as sometimes incorrectly concluded).	D
22.	p22	Rural residential ‘ Approximately 2,000 ha of land previously identified for rural residential development has not been included in the framework	Strongly supported	NA	D
23.	p22	Rural residential over 5,500 ha identified and still to be developed	This is of concern. How will impacts of this development be mitigated	The Framework does not provide any mechanisms for how the potential impacts of subdivision of this 5,500 ha will be avoided, minimised, mitigated and managed. It is important that future subdivision of these areas is controlled through commitments under the SAPP process	-
24.	p22	Bushfire management, paragraph 3: ‘Any proposal for urban development will need to	Agreed, but sentence also applies to rural residential development	Include ‘rural residential development’ in sentence.	-

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
		ensure that it has considered....(bush fire risk)			
25.	p23, Section 3.3	Economy and employment	There is little reference to employment opportunities related to food production, processing and allied industries.	The section should be amended to recognise the economic and employment opportunities provided through food production, processing and allied industries	T
26.	p23, Section 3.3	Economy and employment	Nature-based economic opportunities have been missed	The section should be amended to recognise the economic and employment opportunities provided through nature-based activities, especially around the Ramsar site, Dwellingup, Jarrahdale and state forest.	-
27.	p26	Activity centres	Strongly support the focus on Mandurah and develop it into a regional centre	Inner Mandurah could achieve density targets well beyond those projected. Planned consolidation of Mandurah needs greater support from Government.	G
28.	p26	Secondary centre	Proposal for Ravenswood Riverfront becoming a Secondary centre is not supported	Efforts to create vibrant, mixed use centres should be focused on the two existing centres of Mandurah and Pinjarra. Promotion of a yet-to-developed third centre in the middle (Ravenswood Riverfront) is not supported on the grounds that: <ul style="list-style-type: none"> 1) It will encourage further sprawl between Mandurah and Pinjarra, and not re-inforce consolidation of the two existing centres 2) Create a major traffic bottleneck at the Freeway and add to existing traffic congestion problems further north. 	E
29.	p26	Secondary centres	Pinjarra should be promoted to the status of Secondary Centre	The replacement of Pinjarra as a secondary centre by Ravenswood is not supported.	E

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
30.	p26	‘development of transport infrastructure between Mandurah and Pinjarra...’	Strongly supported	The development of a strong public transport corridor between Pinjarra and Mandurah is strongly supported and will provide the backbone for an activity corridor between the two centres.	B
31.	p28	Nambeelup Strategic Industrial Area	Plan underrates the environmental constraints of the Site	The Nambeelup Industrial Estate site is significantly constrained by high water tables, wetlands and bushland. This needs to be recognised in the Plan text.	-
32.	p30	Education	Agreed that tertiary institutions should be within activity centres, but do not agree with the current approach to locations of Murdoch University etc.	Future planning of tertiary institutions should seek to move them closer to the Mandurah CBD, not further away.	-
33.	p30	Sport and recreation	Lack of recognition of the importance of nature-based recreational areas	Section needs to recognise the growing importance of passive recreational areas associated with natural areas – bushland and wetlands and walk trails. Clear relationship between urban consolidation and the provision of attractive areas for passive recreation and nature-based activities (e.g. natural areas for walking, jogging, picnics and nature-based play).	-
34.	p32 - 39	3.5 Movement and access	State has got priorities wrong with respect to planning for public transport	The section on Public Transport (p35) is inadequate, and reflects the lower priority that public transport received compared to roads. Section on public transport needs to be moved to the front of Section 3.5 and re-written to emphasis the clear need to plan for good public transport to set in place the structure for higher density, vibrant centres and corridors	B and G
35.	p35	Aviation	Planning studies for future possible airports in the sub-region	This planning needs to ensure that comprehensive environmental studies occur, including studies to ensure that aircraft movements around new airports do not interfere with the flightpaths of international migratory birds (protected under Ramsar, JAMBA, and CAMBA international agreements).	

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
36.	p38	Cycling and pedestrians	Strongly support more detailed identification of cycling/pedestrian routes in district and local structure plans	NA	-
37.	p40	Electricity supply	Concern that no mention is made is of the changing face of electricity generation and implications for distribution networks	Plan needs to recognise the growing role of renewables, especially solar and wind, and the implications for land use planning. Even though there are no solid proposals for wind turbines in the sub-region, the potential for renewable energy projects on the palusplain should be included in the text.	-
38.	p40	Water supply and wastewater	Plan should acknowledge potential for Managed Aquifer Recharge (MAR)	Plan should acknowledge potential for Managed Aquifer Recharge (MAR) and implications for the planning and design of future developments. Nambeelup is one example, others may occur if/when Nambeelup is proven	-
39.	p41	Water supply and wastewater, para 6	The use of Tim's Thicket site for wastewater treatment site should not be encouraged	The Tim's Thicket site supports important bushland of regional ecological significance. Any reference to the future potential development of this site must flag the ecological sensitivity of the site.	-
40.	p41	Drainage, para 1	Strongly support statement 'Ongoing improvement and effective management of this drainage network will be necessary to assist in reducing nutrient and sediment export within the Peel-Harvey Catchment area.	See Comment K	K

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
41.	p41	Drainage para 2	Water Sensitive Design and nutrient management <u>must</u> be required (currently says 'may')	WSD and nutrient management are no longer an option; they are a requirement. ALL development must implement both.	K
42.	p41	Drainage	Section needs to refer to the Water Quality Improvement Plan (WQIP) for the Peel-Harvey Estuary	The WQIP sets targets for improvements in water quality. These targets set the aim for all stakeholders to achieve. Reference to the targets should be included in the Framework, and all subsequent planning stages must demonstrate achievement of these standards	K
43.	p41	Other services, para 2	The Tim's Thicket Septage and Waste Disposal Facility should not be expanded	The Tim's Thicket site supports important bushland and is of regional ecological significance. Any reference to the future potential development of this site must flag the ecological sensitivity of the site.	-
44.	p42	Environment and landscape objective	Objective is too narrow	The stated objective suggests that the environment is only conserved for people to enjoy (and that this will conserve biodiversity. Unfortunately, this is not the case, and an explicit objective to conserve biodiversity (nature) needs to be stated up-front. The objective should be re-worded to this effect of: To preserve and enhance the environmental and landscape values of the sub-region for future generations p42to enjoy and conserve biodiversity.	-
45.	p42	Strategic direction and priorities	Statistics are misleading and need re-writing	While it is true that 51% of the sub-region is included in state forest, or parks and recreational reservations, the vast majority of this is in state forest, and is a very different environment to the swan coastal plain. The statistics need to be reworded to present the amount of Swan Coastal Plain ecosystems that are protected, and the amount of the jarrah forest ecosystems that are protected.	Q

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
46.	p42	Strategic direction and priorities: The framework proposes...reservation of further land and waterways.... Dot point 2	Strongly supported, but P&R reservation provides insufficient protection of ecological values	There is significant concern that the Parks and Reservation class in regional scheme does not protect the conservation values of the reserved lands. This is borne out in the various proposals that arise to clear bushland on P&R reserves to accommodate ovals and community uses. The sub-regional Plan should separately classify Open Space as Parks and Recreation OR Conservation Open Space, (not combined into the one category). This recommendation is supported by the EPA (EPA, 2015).	-
47.	p42	Strategic direction and priorities: The framework proposes...consolidation of Yalgorup National Park. Dot point 3	Strongly supported	Strongly support the consolidation of Yalgorup National Park in accordance with long-term recommendations of the EPA.	N
48.	p42	Strategic direction and priorities: Identification of ecological corridors	Strongly supported, but requires implementation mechanisms	In current form, this aspiration is insipid and has not worked over the past 20 years. Greenways and ecological corridors have been identified in the Perth region for over 15 years, and yet the planning system is not able to protect and restore them The planning system needs to formally recognise the greenways or linkages in some formal manner in its statutory plans or documents.	S
49.	p42	Strategic direction and priorities: 'Linkages will need to be considered and implemented through more detailed planning, para 6	Strongly supported, but requires implementation mechanisms	As per Comment 47 and Q	S
50.	p43	Strategic direction and priorities:	The Plans reference to projected sea level rise	Currently states ' <i>Planning and development of these landscapes will need to be undertaken in a holistic manner</i> '.	-

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
		‘Sea level rise will impact on the estuarine system and waterways that enter it. para 9	is ambiguous. Statement needs to be strengthened.’	Should be reworded to the effect of: <i>Planning and development of these landscapes will need to give due regard to projected sea level rise and best-available storm surge modelling.</i>	
51.	p43	Strategic direction and priorities: <i>However, recent evidence indicates...</i> (last para)	Plan needs to link development to achievement of government’s Water Quality Improvement Targets, (currently stated in the Peel-Harvey WQIP).	The WQIP sets targets for improvements in water quality. These targets set the aim for all stakeholders to achieve. Reference to the targets should be included in the Framework, and all subsequent planning stages must demonstrate achievement of these standards	K
52.	p44	Water Resources	Strongly support the statements of principle included in this section.	The section should also recognise: <ul style="list-style-type: none"> a) The fact that the sub-region’s climate is drying; b) the important role of wetland conservation in protecting the quantity and quality of available water resources; c) Encourage further investigations into water re-use, including third-pipe options in new developments 	=
53.	p44	Basic Raw Materials	There are concerns over a number of identified BRM sites in Plan 8	See Comment H	H
54.	p44	Basic Raw Materials	There are a number of key omissions in this section	Section on Basic Raw Materials should recognise that: <ul style="list-style-type: none"> 1) Key areas of Urban deferred, or other development potential, should be utilised for extraction of BRM prior to secondary development; 2) Development styles which avoid or reduce use of BRM will be encouraged and favoured; 3) Use of alternatives to BRM is to be encouraged, such as engineered fill manufactured from Construction and Demolition waste or bauxite residues. 	H

No.	Framework document reference	Aspect/document reference	General comment	Specific comment/ suggested improvement	Relevant Major comment
55.	p48	Implementation: Consolidated Urban Form	No action is identified for infrastructure agencies to support Consolidated Urban Form	For example, actions should be assigned to the State Government's agencies that will need to plan for higher density development, such as transport planning, electricity provision, sport and recreation planning, wildlife conservation, and water provision and management.	-
56.	p51	Implementation: Service infrastructure	A new action is required to support, among others, modification of the existing drainage systems.' (p41 – drainage)	A new action is required in Table 4 to empower/compel stakeholders to 'address the management of existing and future drainage systems ' (as part of development plans (statement on p41 – Drainage)	-
57.	p52	Implementation: Environment and landscape	Actions in this section require leadership from state government agencies	Four of the five actions in this section are assigned to local government. While recognising the important part that local governments play in environmental protection and management, leadership on ecological linkages should be provided by state government, for example the Department of Parks and Wildlife and Department of Planning. The proposed action: <i>Identify and protect ecological linkages</i> , should be re-assigned to DPaW and DoP.	-
58.	p52	Natural Resources (Basic Raw Materials)	New action required to clearly assign responsibility for further investigation of basic raw material sites	The Plan assumes readers understand what may or may not be included in future SAPP documents in regard to BRM sites. A number of the proposed BRM sites in Plan 8 are not supported and separate public consultation process should be held to enable adequate public scrutiny of these BRM proposals. The Plan also needs to include an action of how future planning of these sites will consider/trade-off BRM with environmental values, and how the public will be able to provide comment on proposed trade-offs..	H

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