

SHIRE OF DENMARK
TOWN PLANNING SCHEME No. 3

LOT 366 HORSLEY ROAD
DENMARK

LOCAL STRUCTURE PLAN
AMENDMENT

Endorsement

This structure plan amendment is prepared under the provisions of the Shire of Denmark Town Planning Scheme No. 3.

IT IS CERTIFIED THAT THIS STRUCTURE PLAN AMENDMENT WAS APPROVED BY RESOLUTION OF THE WESTERN AUSTRALIAN PLANNING COMMISSION ON:

_____ Date

Signed for and on behalf of the Western Australian Planning Commission:

an officer of the Commission duly authorised by the Commission pursuant to section 16 of the Planning and Development Act 2005 for that purpose, in the presence of:

_____ Witness

_____ Date

_____ Date of Expiry

Amendments:

Amendment No.	Summary of Amendment	Amendment Type	Date Approved (WAPC)
1	Provision for Amaroo Village Retirement Development Site	Minor	

EXECUTIVE SUMMARY

This Local Structure Plan amendment has been prepared to make provision for the Amaroo Village Aged Care/Retirement Living Development Site on Lot 366 within the 2012 Horsley Road and Rockford Road Local Structure Plan as well as modifying an optional road layout proposal so as to accommodate an agricultural dam located on Lot 365.

The Horsley Road and Rockford Road Local Structure Plan area is located 1100m immediately north of the town centre. It is an identified urban grown area and can be efficiently provided with all relevant urban infrastructure and human services.

In accord with local and state policy promoting well planned and serviced aged care/retirement living development, this amendment provides for the intensification of residential land use and the efficient use of underutilised and serviceable land.

This is a simple amendment affecting a small portion of the overall site without any significant impact on the Movement Network, Public Open Space Network or other specific design considerations of the overall Local Structure Plan. As a result, this amendment should be read in conjunction with the 2012 Horsley Road and Rockford Road Local Structure Plan.

Local Structure Plan Summary:	
Total Area	29.1604ha
Existing Lots	5
Estimated Lot Yield	R20- 259 R30- 46 Total- 305
Dwelling Density	10.4Dw/ha
Estimated Population	7pp
Estimated Additional Population	720pp
School Sites / Other	NA

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Attachment 1 – Horsley Road/Rockford Road Local Structure Plan (2012)

Attachment 2 – Lot 366 Bushfire Hazard Assessment & Bushfire Management Plan (2019)

PART 1. – STATUTORY

1.0 Structure Plan Amendment Area

The Structure Plan Area covers five lots (50, 51, 365, 366 & 372) bounded generally by Horsley Road, Rockford Road, Scotsdale Road and McLean Road. The Amaroo Aged Care/Retirement Living Development will be located on the western portion of Lot 366 as shown below.



2.0 Content of Local Structure Plan Amendment

The Local Structure Plan Amendment comprises two parts being:

1. Statutory; containing the planning mechanisms required to provide for the amendments to the Local Structure Plan. It also contains the Amended Local Structure Plan Map.
2. Explanatory; referring to the background for and issues inherent in the amendments to the Local Structure Plan map.

3.0 Relationship to Town Planning Scheme No. 3

The requirements of the LSP and amendment to the LSP apply as if they were part of the Scheme.

In any conflict between scheme clauses or provisions and the LSP, the provisions or clauses of the scheme shall prevail.

Words and expressions used in the LSP have the same meaning as given in Town Planning Scheme No. 3.

Pursuant to clause 27 Schedule 2 Part 4 of the Planning and Development (Local Planning Schemes) Regulations 2015, due regard is to be given to the requirements of the Local Structure Plan in any subdivision and development applications.

4.0 Operation

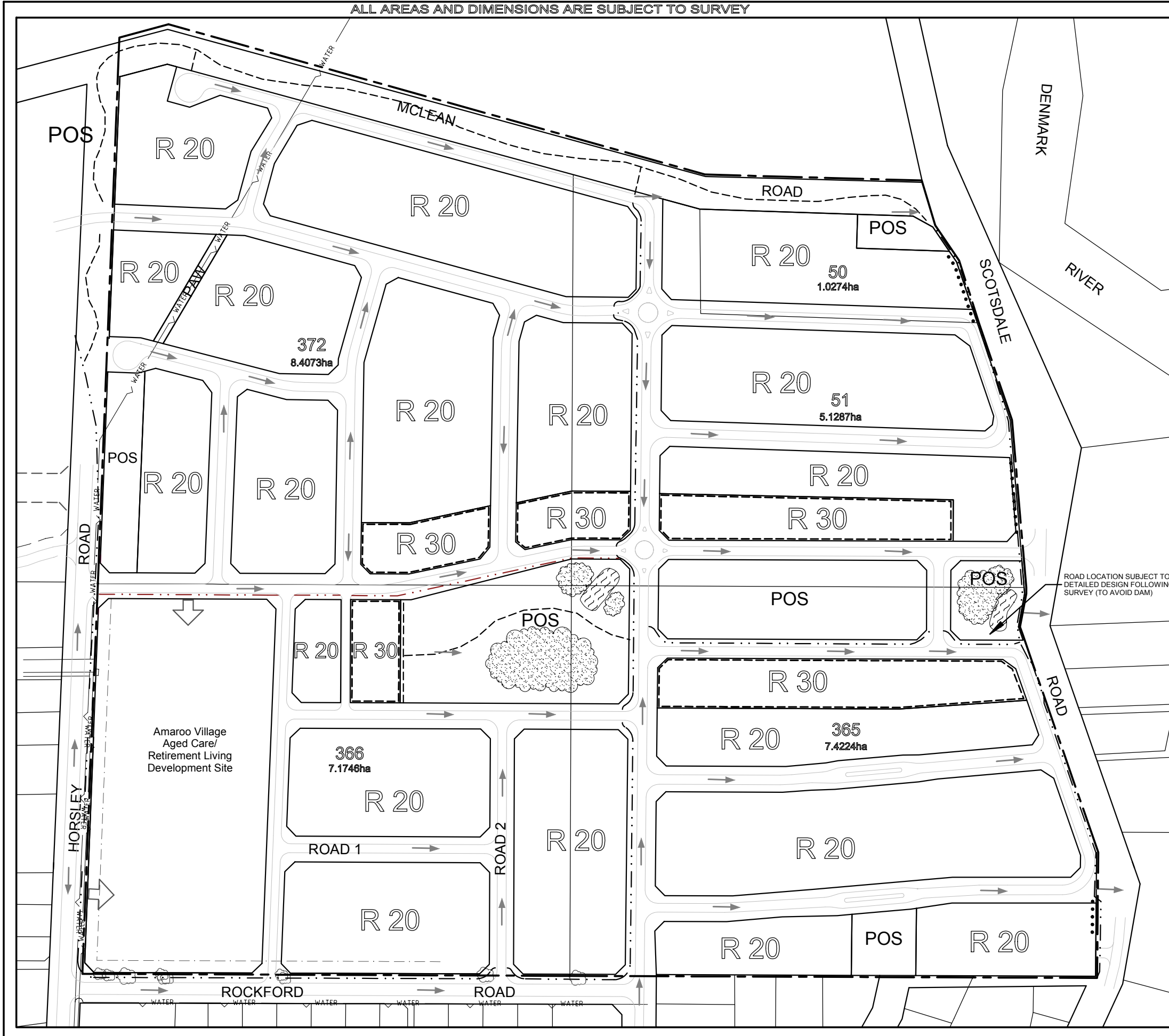
The amendment to the LSP will come into effect following certification by the Western Australian Planning Commission.

5.0 Subdivision and Development Conditions

In the case of any conflict between the 2012 Horsley Road and Rockford Road Local Structure Plan and the Amendment conditions and plan below, the Amendment Conditions and Plan shall prevail.

Minor variations may be approved by the Western Australian Planning Commission.

ALL AREAS AND DIMENSIONS ARE SUBJECT TO SURVEY



Local Structure Plan

Horsley Road & Rockford Road Shire of Denmark

LEGEND

- Direct access to Scotsdale Road Prohibited/Uniform Fencing
- Dual Use Path
- Foot Path
- 7.5m Building Setback
- Water Easement
- Drainage Basin
- Landscaping & Planting
- Flood Routing
- Trees (To Be Retained)
- Site Access (indicative)

SUMMARY:

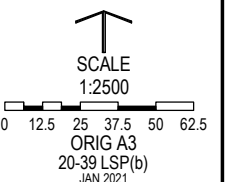
Lot No.	LOT AREA	Estimated R 20	Estimated R 30	Estimated RESID. LOT YIELD
Lot 50	1.0274ha	11	0	11
Lot 51	5.1287ha	51	16	67
Lot 365	7.4224ha	64	17	81
Lot 366	7.1746ha	39	5	44 plus Devel. Site
Lot 372	8.4073ha	94	8	102
TOTAL	29.1604ha	259	46	305

ROAD LOCATION SUBJECT TO DETAILED DESIGN FOLLOWING SURVEY (TO AVOID DAM)

Amaroo Village
Aged Care/
Retirement Living
Development Site

MELVISTA PARK PTY LTD
BOX 333, NORTH BEACH, WA 6920
PHONE 9448 9911 FAX 9243 1496

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PLANNING
59 Peels Place
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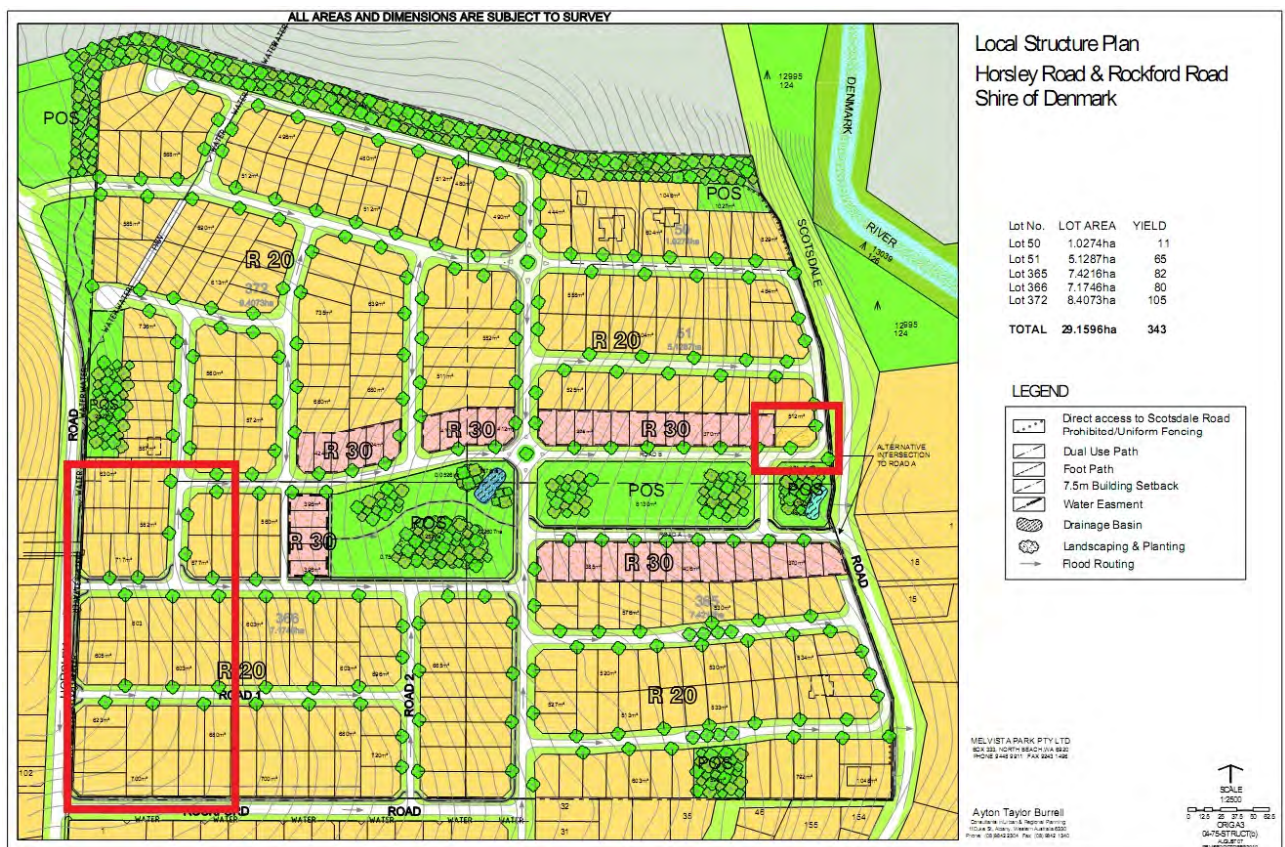
PART 2 – EXPLANATORY

1.0 2012 Local Structure Plan and Modification Areas

The Horsley Road/Rockford Road Local Structure Plan was endorsed by the WA Planning Commission on 18 May 2012. The plan is included below and covers Lots 50, 51, 365, 366 & 372 bounded by Horsley Road, Rockford Road, McLean Road and Scotsdale Road. See Attachment 1.

The purpose of this amendment is to make provision for an aged care/retirement living site in the south west portion of Lot 366. A minor modification is also being made to accommodate a dam developed on Lot 365 and as a result, formalise the Lot 51 access option to Scotsdale Road that is noted on the existing LSP.

The areas that are being updated by this amendment are highlighted below. In all other areas the existing 2012 Local Structure Plan continues to apply.



A Retirement Living/Aged Care site is provided on the south west corner of the LSP on Lot 366. This has resulted in the relocation of the entry road to the shared northern boundary of Lot 366 & 372 and the truncation of three residential cells with a boundary access road to define the development site and separate the residential landuses.

Liaison has been ongoing with the owners of Lot 365 & Lot 372 & 51 who support the other changes that have been necessary to accommodate the modified access to Scotsdale Road.

The central POS spine along the drainage line is retained as are the two areas in the south east and north west to protect significant trees. The only change is a minor one to the shape of the POS area north of the shared entry road. All other POS proposals of the existing LSP remain unchanged.

There is no significant impact on the movement network outlined on the LSP. The replacement Horsley Road site entry road has been relocated to the north to the boundary of Lot 366. This road provides direct access for the subdivision of Lot 366 and Lot 372.

The intersection point mirrors a previous iteration of the LSP and has been specifically accommodated in the planning of access road locations further up Horsley Road.

To ensure its continued functionality and amenity, the main east west Dual Use Path has been realigned to the new site entry road.

Drainage and flood routing arrangements are unchanged. Alignments are shown and remain utilising road reserves and the POS network to protect residential land.

Reticulated water and sewer connection arrangements remain unchanged.

2.0 Retirement Living/Aged Care Site and proposal

Following the allocation of a 40 aged care bed licence for the Denmark townsite, Amaroo Care Services has identified Lot 366 as the location for the associated residential Living/aged care facility.

The identified portion of Lot 366 meets necessary criteria including:

- Adequate size to accommodate development, associated activities and facilities including regional management, staff accommodation, parking and the like, as well as potential longer-term expansion.
- Is in a pleasant area with an attractive outlook which will benefit residents.
- In an area identified for residential and associated development.
- In an area that is readily serviced with power, water, sewer, etc.
- Is in close proximity to the town centre and hospital.
- Is flat or very gently sloping especially when compared to most areas surrounding the townsite.
- Is at a low or very low fire risk especially when compared to most areas surrounding the townsite.
- Has two road frontage and excellent road connectivity to the town centre.
- Can be readily integrated with future residential development.

It is worth noting that other sites close to the town centre were seriously considered but in the end were discounted on the basis of size, unmanageable fire risks and slope/need for excessive retaining.

Aged Care Facility

Aged care facilities, particularly in a regional location, need to be more than just an arrangement of beds. The buildings and design need to accommodate a range of service offerings to promote the quality of life and wellbeing of the residents and their stakeholder families and social relationships within the community. Accordingly, there are other activities that take place within and around a care facility to embrace social interaction and activities, including —

- occupational therapy and physiotherapy,
- wellness programs
- Day centre activities

Also, given the regional nature of the facility, Amaroo is also intending to incorporate accommodation options for spouses/partners and shift staff. Assisted living units can allow the partners and spouses of care residents to reside in very close proximity and not be separated at a time of life when their needs are greatest.

A small number of units for staff accommodation are envisaged in order to be able to attract and retain staff from the surrounding community. Staff retention is critical to be able to successfully operate in this industry.

Typically, a facility of this type also requires adequate functional amenities including carparking areas and maintenance and workshop space.

As a regional centre, Amaroo would also base their administration in this facility for other service activities, including Home Care and Village Management.

Growth

The identified site is sized to ensure that the facility and or amenities could be increased and grow, should the demand from the community increase over time. This may allow for more care options or more accommodation for seniors.

Supporting Local Resources

Development and ongoing servicing of the facility is planned to utilise local health care and service professionals in order to run the care support business and services. These would include;

- General medical practitioners
- Pharmacy
- Physio and OT
- Massage and podiatry
- Hairdresser
- Cleaners
- Gardeners etc.

Slope and Accessibility

Given almost all land in Denmark is elevated and has a substantial contour/slope, the location in the south west of Lot 366 is the flatter part of the site. This allows for the creation of a level development site with minimal fill, retaining and batter requirements. Preliminary designs show a pad height at 58.5mAHD.

Whilst the difference in ground levels between the township and the site may be more than some other land options in Denmark, these other options lose out in the totality of selection criteria. Further, this consideration is reduced in significance given the mobility profile of the future residents.

By the time that a typical resident is assessed as requiring the higher levels of aged care that will be provided on site, and is then admitted into a care facility, they are highly unlikely to have any significant pedestrian capability. Unfortunately, the current profile of aged care residents across the country is more aligned to end of life scenarios.

Landuse Intensity

The experience of Amaroo is that the traffic generated from an aged care facility (including ancillary activities), is substantially less than the normal traffic movements produced by typical residential development. In this instance, the aged care/retirement living development of 40 single aged accommodation units will replace some 36 residential lots with their typical daily movements of 5 to 10 per lot per day.

Further, the vehicular traffic that services an aged care facility is generally focused across two shift change times per day. Neither of these time conflict with either "peak" traffic for workers, nor school start/finish times.

Bushfire Safety

As a part of background planning for the development on Lot 366, a Hazard and BAL Assessment was completed (see Attachment 2.)

This assessment was prepared to address State Planning Policy 3.7 and found that in the current predevelopment state, the only specific hazards exist in the north west of Lot 366 and in a couple of areas within the Horsley and Rockford Road Reserves. Other than that adjoining grassland extends small and manageable hazard areas along the boundary of Lot 366.

Post development, these hazard areas can be managed in the following manner:

- In the north west hazard areas will be removed as a result of the clearing and development of the site entry road.
- Horsley Road hazards will be reduced as a result of service provision within the eastern verge of Horsley Road and earthworks clearing within the development site itself. Further, in accord with the Local Structure Plan there is a development setback of 7.5m stipulated to Horsley Road.
- Rockford Road hazards will be reduced as a result of service provision within the road reserve and the retention of the individual identified significant trees. Further, in accord with the Local Structure Plan there is a development setback of 7.5m stipulated to Rockford Road.

3.0 WAPC Position Statement: Residential Aged Care (2020)

The WAPC has a Position Statement covering the provision of Aged Care. This Position Statement has recently been endorsed and as such should be addressed as a part of individual proposals.

The Position Statement notes:

- Local Housing Strategies and/or Local Planning Strategies should evaluate/provide for residential aged care.
In this instance, the Local Planning Strategy specifically supports residential aged care within the urban fabric/residential zone.
- Demographic need and future projections.
This has been established with the federal allocation of 40 beds to the Denmark townsite. Although only anticipated at the current time, medium to long term provision is addressed by the identification of a site with spare capacity.
- Site suitability such as zoning, proximity and service availability.
These issues have been addressed as a primary selection criterion as noted above.
- Acceptable development standards (i.e., built form, height, setback, streetscapes, etc.).
These may be delineated in the Scheme, Local Structure Plan or via Local Development Plan/s.

The Position Statement suggests that residential aged care should be approvable uses in the residential zone and that ancillary and incidental uses, activities and amenities supporting the aged care and retirement living components should be favourably considered.

4.0 Shire of Denmark Town Planning Scheme No. 3

The proposed landuse is a “use not listed” under TPS No. 3. As a result, council may review the use and determine it is consistent with the purpose and intent of the prevailing Residential zone and subject to specific consideration approve the use subject to relevant conditions.

On 19 November 2019, Council reviewed a preliminary approach by Amaroo supporting the proposed facility where it was resolved that *“the proposed ‘Residential aged care facility’ proposed at Lot 366 (#68) Horsley Road, Denmark is consistent with the purpose and intent of the ‘Residential’ zone subject to the incidental and ancillary amenities and land-uses associated with and supporting the residential aged care being accessible for the use of residents only.”*

With regards the development of the site the considerations and issues were that:

- The Horsley Road/Rockford Road Local Structure Plan will need to be amended to provide for the development site “whilst clearly showing how the major elements of the structure plan would be retained (i.e. drainage, road connections, Public Open Space, etc.).
- Any subdivision of the development site will be determined by the WA Planning Commission. Council will provide advice to the WAPC and decisions will be based on the Local Structure Plan and any amendments.

- The (then) draft Position Statement outlines a Local Development Plan may be required where development standards are not specified in the Town Planning Scheme (as in this instance). An LDP should ensure development is *“compatible and integrated with streetscape(s) and existing or future desired built form of the locality. LDPs must outline built form requirements, including, but not limited to, building height bulk and scale, open space, setback, access, parking, landscaping, servicing and drainage, visual privacy, solar access and other relevant development requirements.”*
- That an application for development approval for aged care/retirement living will need to address the... *steep sloping nature of the site to ensure development meets the gradient requirements for access and universal design of buildings.*

To these points:

- The Horsley Road/Rockford Road Local Structure Plan issues are addressed within this amendment. The amended plan identifies the few modified road connections & how they work. The amended plan retains existing measures connected with drainage, Public Open Space, etc.
- The amended plan identifies the aged care/retirement living site and as such may be used as a guide for any potential subdivision proposal/s.
- Issues connected with detailed development will be addressed in the design of the development and assessed at the Planning Approval stages.

5.0 Residential Design Codes

The Residential Design Codes (State Planning Policy 3.1) make specific provision for aged or dependent persons dwellings in areas coded less than R40.

These requirements cover:

- Plot ratio area.
- Minimum development size.
- Car parking requirements.
- Provision of outdoor living areas.
- Accessible pathways and entries for ground floor units.
- Accessible internal design.

These issues will be addressed in the design of the development and assessed at the Planning Approval stages.

6.0 Conclusion

The Retirement Living/Aged Care Facility along with the ancillary uses can be accommodated on Lot 366 and within the Local Structure Plan area as proposed.

The landuse and identified site is consistent with the Residential Zone, the Residential Design Codes, the draft Position Statement and the Local Structure Plan amendments.

Minimal changes to the Local Structure Plan are required for the aged care/retirement living site and to accommodate the rationalisation of access to the east connected with the development of the dam on Lot 365 and these have been identified within this plan.

ATTACHMENT 1.

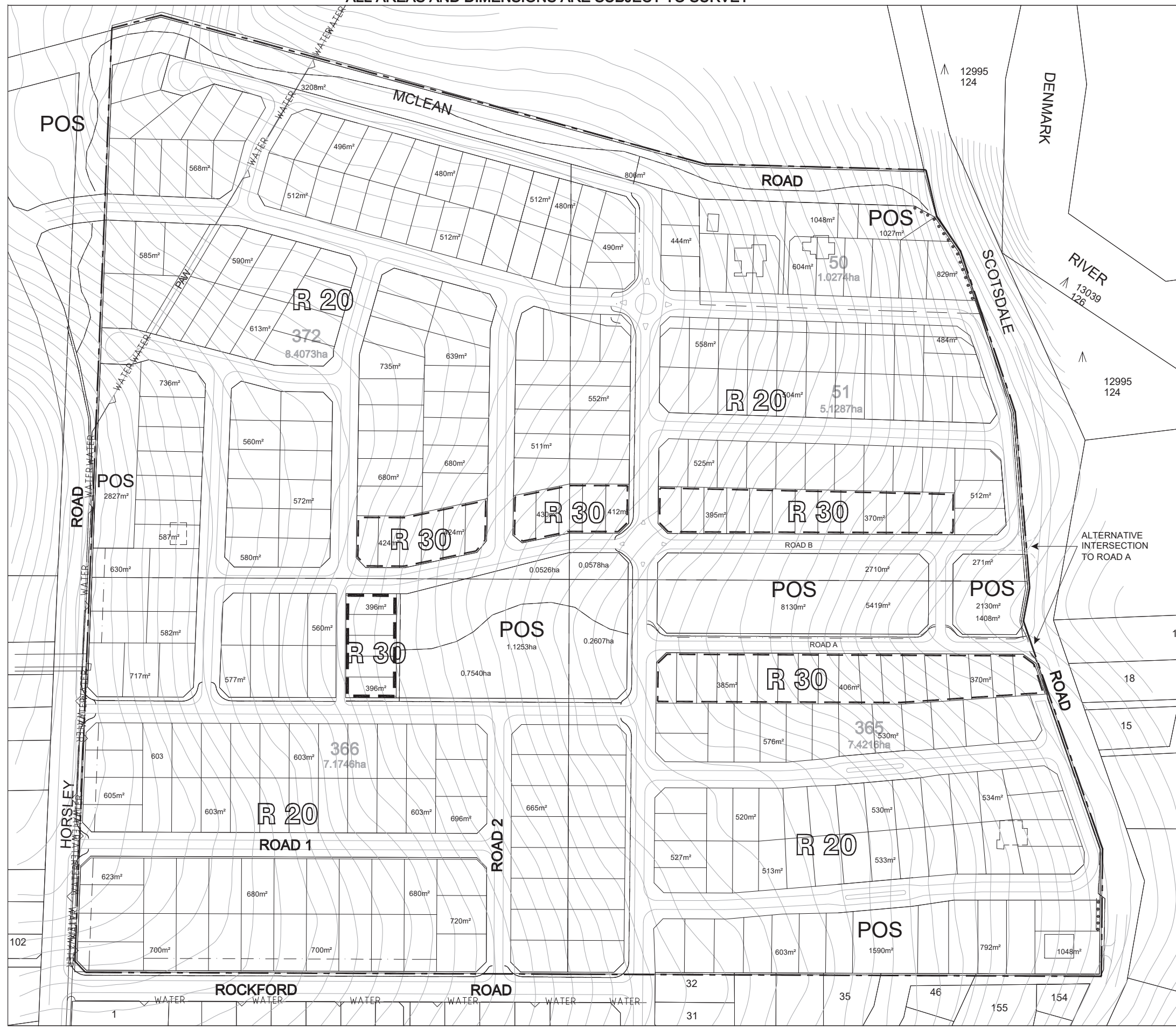
HORSLEY ROAD / ROCKFORD ROAD
LOCAL STRUCTURE PLAN (2012)

ALL AREAS AND DIMENSIONS ARE SUBJECT TO SURVEY

Local Structure Plan

Horsley Road & Rockford Road

Shire of Denmark



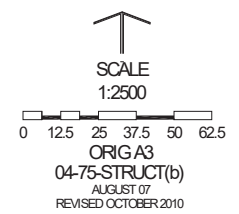
Lot No.	LOT AREA	YIELD
Lot 50	1.0274ha	11
Lot 51	5.1287ha	65
Lot 365	7.4216ha	82
Lot 366	7.1746ha	80
Lot 372	8.4073ha	105
TOTAL	29.1596ha	343

LEGEND

- Direct access to Scotsdale Road Prohibited/Uniform Fencing
- Dual Use Path
- Foot Path
- 7.5m Building Setback
- Water Easement
- Drainage Basin
- Landscaping & Planting
- Flood Routing

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ATTACHMENT 2.

**LOT 366 BUSHFIRE HAZARD ASSESSMENT
& BUSHFIRE MANAGEMENT PLAN (2019)**

SECTION 1: Proposal details

Bio Diverse Solutions was commissioned to assess Lot 366 (No. 68) Horsley Road, Denmark ('subject site) for a due diligence process in regards to bushfire planning requirements. The subject site of approximately 7.17ha is zoned residential and presently used for agricultural purposes. Amaroo Care Services Inc propose to develop a portion of the site into an aged care facility. Refer to Appendix A for Amaroo Care Services Inc concept plans. An approved Western Australian Planning Commission (WAPC) Local Structure Plan has been developed over the subject site (refer to Appendix B) and WAPC subdivision for 22 lots and has been developed over the eastern portion of the subject site (Appendix B). The subject site is located in the municipality of the Shire of Denmark (SoD), refer to location plan Figure 1. The subject site is partially located in the WA bushfire prone area mapping (SLIP, 2019), refer to Figure 2.

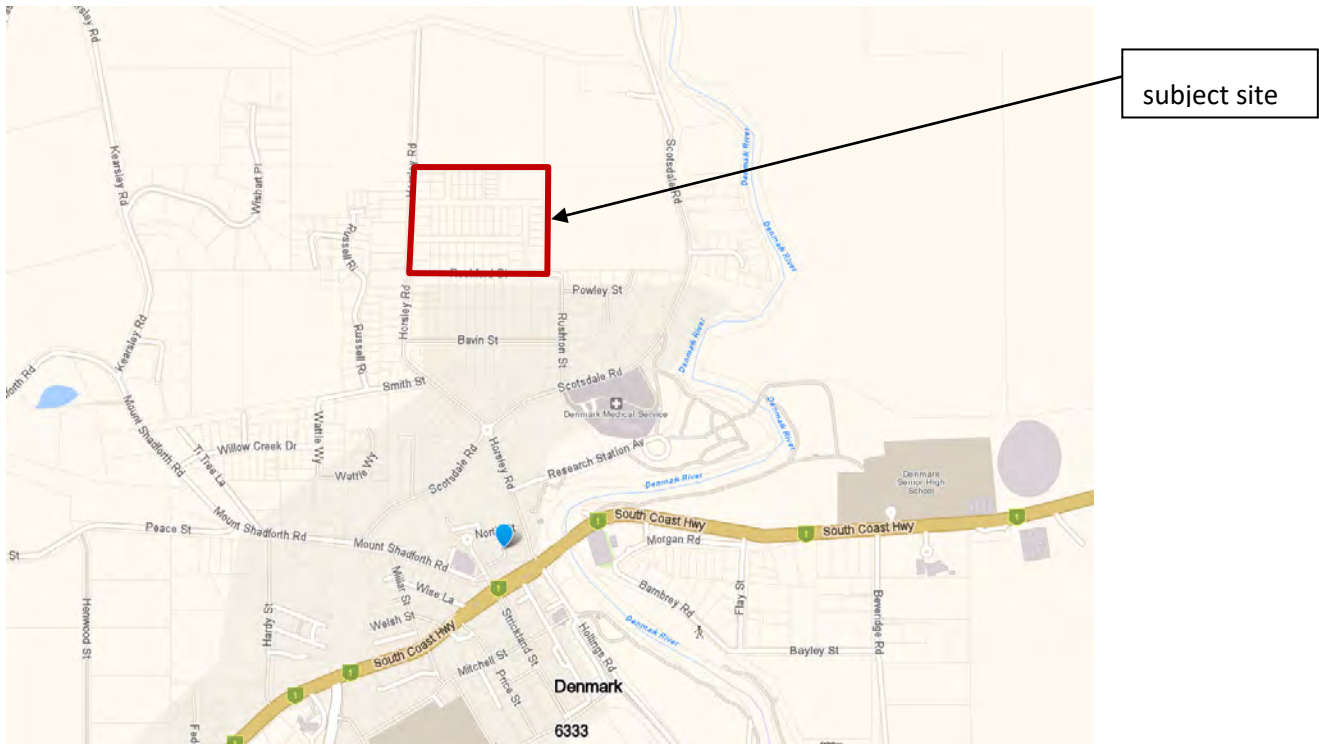


Figure 1: Location Plan

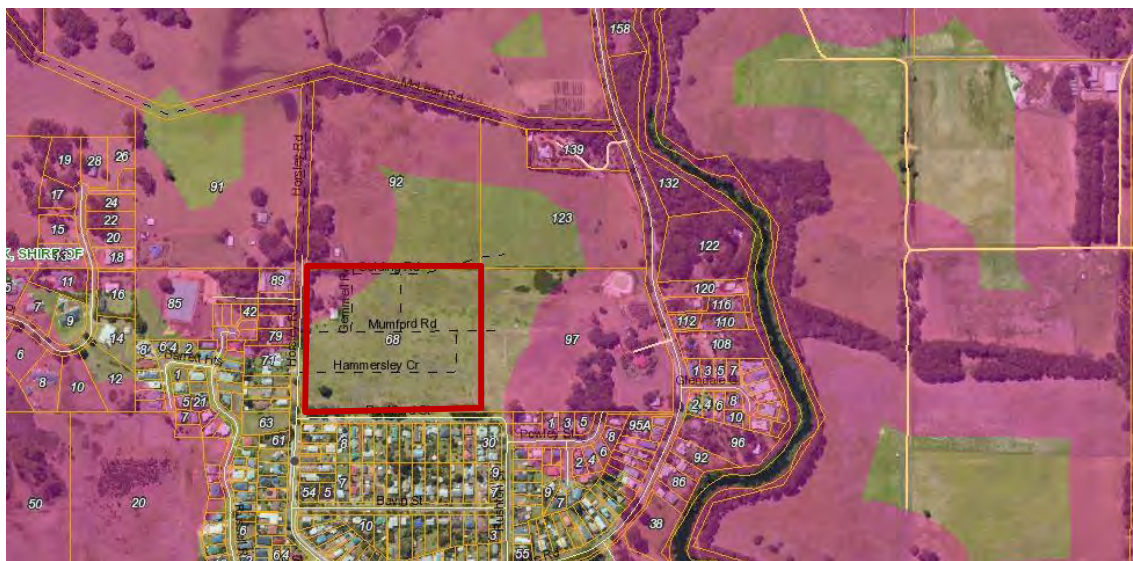


Figure 2: State Bushfire Prone Area Mapping (SLIP 2018)

SECTION 2: Environmental Considerations

Vegetation modification proposed: Internal to the subject site is predominantly paddock/pasture with some weeds, no clearing of native vegetation will be required as part of any future development. Trees are noted in the Rockford Road reserve and a tree retention/removal plan has been developed and approved by the Shire (noted in WAPC subdivision conditional approval (advice note 3).

Re-vegetation/landscape plans: Landscaping will form part of the Development Application (D.A.) for the aged care facility. A concept landscape plan is to be developed with the D.A. All landscaping is to confirm to the WAPC Asset Protection Zone Standards, see Appendix C of this report.

SECTION 3: Assessment Results

SECTION 3.1 – Assessment Inputs

Bushfire Assessment inputs for the site has been calculated using the Method 1 procedure as outlined in AS3959-2018. This incorporates the following factors:

- WA adopted Fire Danger Index (FDI), being FDI 80;
- Vegetation Classes;
- Slope under classified vegetation; and
- Distance between the subject site and classified vegetation.

Vegetation Classification (Bushfire Fuels)

A method 1 BAL Assessment was undertaken of the lot. A site inspection was undertaken on the 25th of November 2019 by Level 1 BAL Assessor Jason Benson (BPAD 37893) to assess the current land use, topography/slope, vegetation and conditions of the site and its surroundings. Photographs of the subject site and surrounding areas were taken and have been presented in the following pages. All vegetation within 200m of the lot boundary was classified in accordance with Table 2.3 and Exclusion clauses 2.2.3.2 of AS 3959-2018. Each distinguishable vegetation plot with the potential to determine the Bushfire Attack Level is identified in the following pages.

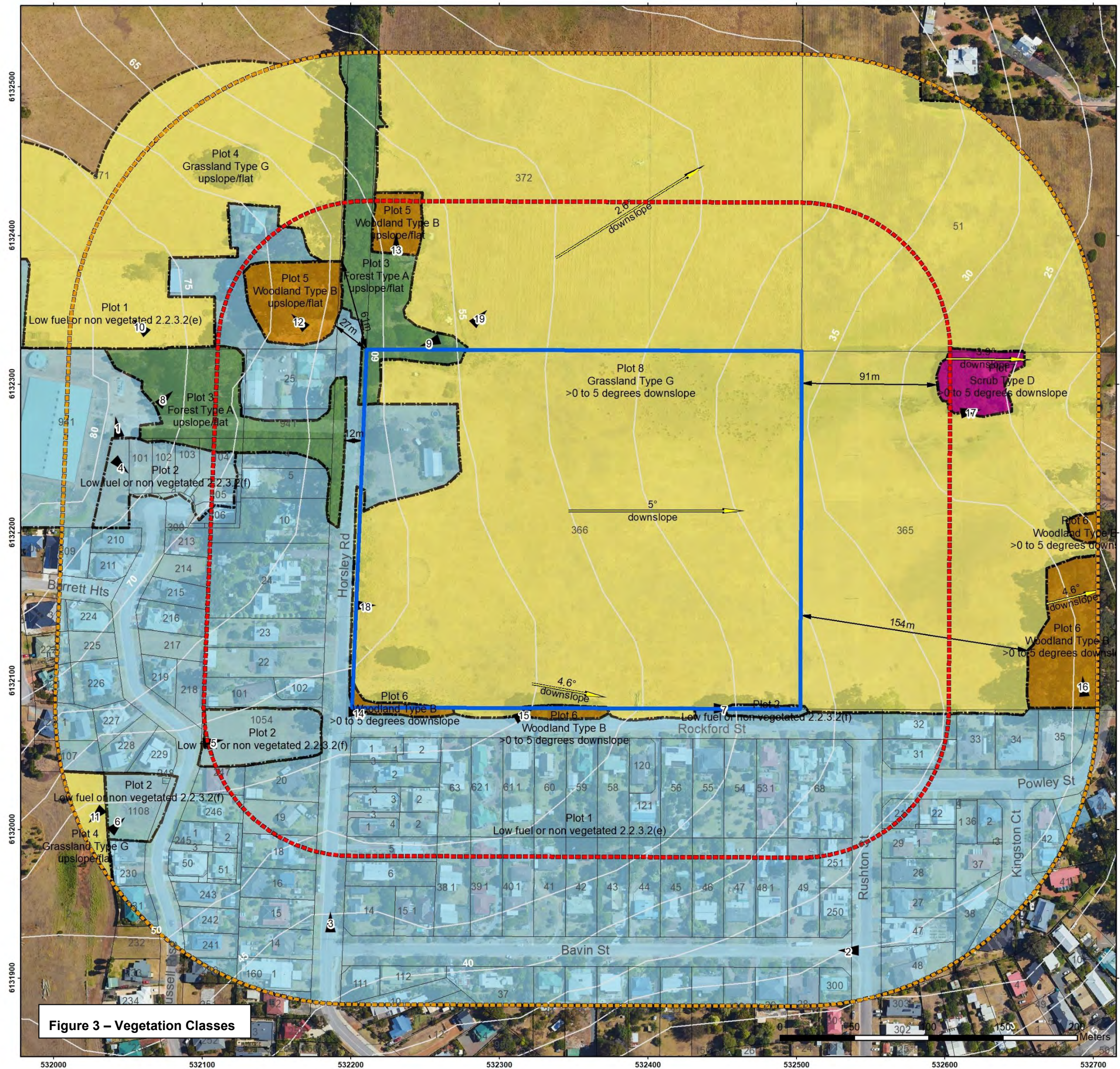
This BAL Plan was prepared by:
 Kathryn Kinnear, Bio Diverse Solutions
 Accreditation No: BPAD30794
 Jurisdiction: Level 2 - WA



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 Albany, WA 6330
 Australia
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Overview Map Scale 1:100,000



Legend

- Subject Site
 - 100m Assessment Boundary
 - 200m Assessment Boundary
 - Cadastre
 - Photo Point
 - 5m Contours
 - Slopes Degrees
 - Separation Distance
 - Vegetation/Plot Boundary
- Vegetation**
- Forest Type A
 - Woodland Type B
 - Scrub Type D
 - Grassland Type G
 - Low fuel or non vegetated 2.2.3.2
- Scale
 1:2,500 @ A3
 GDA MGA 94 Zone 50

Data Sources
 Aerial Imagery: WA Now, Landgate Subscription Imagery
 Cadastre, Relief Contours and Roads: Landgate 2017
 IRIS Road Network: Main Roads Western Australia 2017
 Overview Map: World Topographic map service, ESRI 2012

CLIENT Robert Spencer
 Amaroo Care Service Inc
 Lot 366 (No. 68) Horsley Road
 Denmark WA 6333

Vegetation Classes

BAL Assessor	QA Check	Drawn by
JB	BT	CC
STATUS	FILE	DATE
FINAL	MSC0266	3/12/2019

Figure 3 – Vegetation Classes


Plot	1	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (e)
			<p>Location: West, south west and south of the subject site.</p> <p>Description: Water tanks, bare areas, driveway, buildings, roads and hardstand areas.</p> <p>As per exclusion clause 2.2.3.2 (e) of AS3959-2018.</p>

Photo Id 1: View to the north through non vegetated area to the west of the subject site.


Plot	1 cont.	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (e)
			<p>Additional photo of Plot 1.</p>

Photo Id 2: View to the west from Rushton Street along Bavin Street to the south of the subject site.


Plot	1 cont.	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (e)
			<p>Additional photo of Plot 1.</p>

Photo Id 3: View to the north from Bavin Street along Horsley Road.


Plot	2	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (f)
			<p>Location: West, south and south-west of the subject site.</p> <p>Description: Managed lawns, windbreaks, low fuel areas, maintained gardens and low threat vegetation.</p> <p>As per exclusion clause 2.2.3.2 (f) of AS3959-2018.</p> <p>Available fuel loading: <2t/ha.</p>

Photo Id 4: View of managed grass to the west of the subject site located at the end of Russel Rise.


Plot	2 cont.	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (f)
			<p>Additional photo of Plot 2.</p>

Photo Id 5: View from Russel Rise of managed grass to the south-west of the subject site.


Plot	2 cont.	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (f)
			<p>Additional photo of Plot 2.</p>

Photo Id 6: View looking east towards managed grass to the west of Russel Rise. Located south-west of the subject site.


Plot	2 cont.	Classification or Exclusion Clause	Low fuel or Non-vegetated areas exclusion 2.2.3.2 (f)
			<p>Additional photo of Plot 2.</p>

Photo Id 7: View facing east towards single row of windbreak trees with maintained understorey in Rockford Street Reserve. Located along the southern boundary of the subject site.


Plot	3	Classification or Exclusion Clause	Forest Type A
			<p>Location: West and north-west of the subject site.</p> <p>Separation distance: 0m.</p> <p>Dominant species & description: Karri, Marri and Casuarina forest with multilayered scrub understorey consisting of Bracken, Karri Hazel Sword Grass sedges and rushes.</p> <p>Average vegetation height: 10-15m.</p> <p>Vegetation Coverage: >30-70% foliage cover.</p> <p>Available fuel loading: 25-35 t/ha.</p> <p>Effective slope: Upslope/Flat.</p>

Photo Id 8: View of Forest Type A located to the west of the subject site.


Plot	3 cont.	Classification or Exclusion Clause	Forest Type A
			<p>Additional photo of Plot 3.</p>

Photo Id 9: View of Forest Type A within the subject site and on adjacent lot. Located north-west of the subject site.

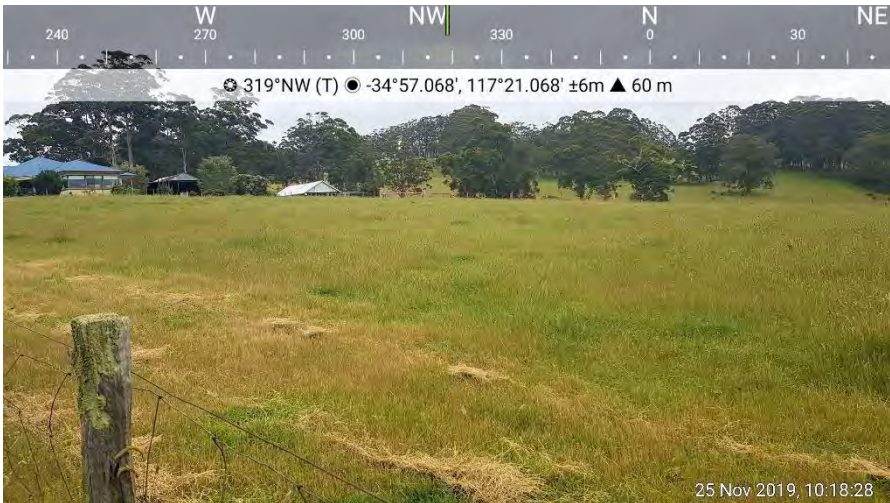
Plot	4	Classification or Exclusion Clause	Grassland Type G
			<p>Location: North-west and south-west of subject site.</p> <p>Separation distance: 61m.</p> <p>Dominant species & description: Paddock areas located north-west and south-west of subject site.</p> <p>Average vegetation height: 50-200mm.</p> <p>Vegetation Coverage: <10% trees.</p> <p>Available fuel loading: 4.5 t/ha.</p> <p>Effective slope: Upslope/Flat.</p>

Photo Id 10: View looking north-west across paddock area to the north-west of the subject site.


Plot	4 cont.	Classification or Exclusion Clause	Grassland Type G
			<p>Additional photo of Plot 4.</p>

Photo Id 11: View looking south-west across paddock area to the south-west of the subject site.


Plot	5	Classification or Exclusion Clause	Woodland Type B
			<p>Location: North and north-west of subject site in private property.</p> <p>Separation distance: 27m.</p> <p>Dominant species & description: Karri and Marri, partially maintained grass understorey, not multilayered.</p> <p>Average vegetation height: 10-15m.</p> <p>Vegetation Coverage: 10-30% foliage cover.</p> <p>Available fuel loading: 15-25 t/ha.</p> <p>Effective slope: Upslope/Flat.</p>

Photo Id 12: View facing north-west towards patch of woodland on nearby property located to the north-west of the subject site.

Plot	5 cont.	Classification or Exclusion Clause	Woodland Type B
			<p>Additional photo of Plot 5.</p>

Photo Id 13: View facing north towards small patch of woodland on nearby property located to the north of the subject site.


Plot	6	Classification or Exclusion Clause	Woodland Type B
			<p>Location: South and east of subject site in private property and the Rockford Street road reserve.</p> <p>Separation distance: 0m.</p> <p>Dominant species & description: Karri and Marri trees, understorey consisting mainly of grasses and Watsonia, not multilayered.</p> <p>Average vegetation height: 10-15m.</p> <p>Vegetation Coverage: 10-30% foliage cover.</p> <p>Available fuel loading: 15-25 t/ha.</p> <p>Effective slope: Downslope >0-5 Degrees.</p>

Photo Id 14: View facing east looking through thin strip of roadside vegetation along Rockford Street.

Plot	6 cont.	Classification or Exclusion Clause	Woodland Type B
			<p data-bbox="1038 248 1342 282">Additional photo Plot 6.</p>

Photo Id 15: View facing east north-east looking through thin strip of roadside vegetation along Rockford Street.

Plot	6 cont.	Classification or Exclusion Clause	Woodland Type B
			<p data-bbox="1038 1086 1342 1120">Additional photo Plot 6.</p>

Photo Id 16: View facing north towards small patch of woodland on nearby property located to the east of the subject site.


Plot	7	Classification or Exclusion Clause	Scrub Type D
			<p>Location: East of subject site in adjacent private property.</p> <p>Separation distance: 91m.</p> <p>Dominant species & description: Tea Tree, Blackberry, sedges and rushes.</p> <p>Average vegetation height: <4m.</p> <p>Vegetation Coverage: >30% foliage cover.</p> <p>Available fuel loading: 25 t/ha.</p> <p>Effective slope: Downslope >0-5 Degrees.</p>

Photo Id 17: View facing east towards small patch of scrub on nearby property to the east of the subject site. Note 2m height staff.



Plot	8	Classification or Exclusion Clause	Grassland Type G
			<p>Location: Internal to the subject site and to the north, north-east and east.</p> <p>Separation distance: 0m.</p> <p>Dominant species & description: Paddock/pasture, bracken and other weed species.</p> <p>Average vegetation height: 50-200mm.</p> <p>Vegetation Coverage: <10% trees.</p> <p>Available fuel loading: 4.5 t/ha.</p> <p>Effective slope: Downslope >0-5 Degrees.</p>

Photo Id 18: View facing east looking across paddock area on the western boundary of the subject site.

Plot	8 cont.	Classification or Exclusion Clause	Grassland Type G
			<p>Additional photo Plot 8.</p>
<p><i>Photo Id 19: View facing north-east looking across paddock area to the north of the subject site.</i></p>			

COMMENTS ON VEGETATION CLASSIFICATIONS:

- Distances from vegetation were made based on surface fuels to edge of lot (subject site) boundary;
- Effective slopes were measured in the field using a Nikon Forestry Pro and represented on the respective plots;
- Method 1 (AS3959-2018) Simplified procedure was used for vegetation classification and BAL Assessment process;
- All vegetation was classified within the subject site and within 200m of the lot boundary to AS3959 Table 2.3; and
- The perimeter of the vegetation was measured using field GPS and notations on field GIS maps.

SECTION 3.2 Bushfire Assessment Outputs

A Method 1 BAL calculation (in the form of BAL contours) has been completed for the subject site. The BAL Contours are depicted in accordance with AS 3959-2018 and WAPC defined methodology. The BAL rating gives an indication of the level of bushfire attack (i.e. the radiant heat flux) that may be received by proposed buildings and subsequently informs the standard of building construction required to increase building tolerance to potentially withstand such impacts in line with the assessed BAL.

The potential bushfire impact to the site from each of the identified vegetation plots are identified below in Table 1 and shown in the BAL Contour Plan (Figure 4) Page 16 (Note Plot 1 and 2 are low fuel so not represented on Table 1).

Table 1 - Potential Bushfire impacts to AS3959

Plot number	Vegetation Type (Table 2.3)	Slope (Table 2.4.3)	Separation distance to vegetation (m)	BAL Allocation to subject lot boundary
3	Class A - Forest	Upslope/Flat	0m	BAL-FZ
4	Class G Grassland	Upslope/Flat	61m	BAL-LOW
5	Class B Woodland	Upslope/Flat	27m	BAL-19
6	Class B Woodland	>0-5 degrees	0m	BAL-FZ
7	Class D Scrub	>0-5 degrees	91m	BAL-12.5
8	Class G Grassland	>0-5 degrees	0m	BAL-FZ

Note: The bushfire risks creating BAL FZ are radiating from external to the site (to the lot boundary), the subject site is assumed to be cleared low fuel status (i.e. developed).

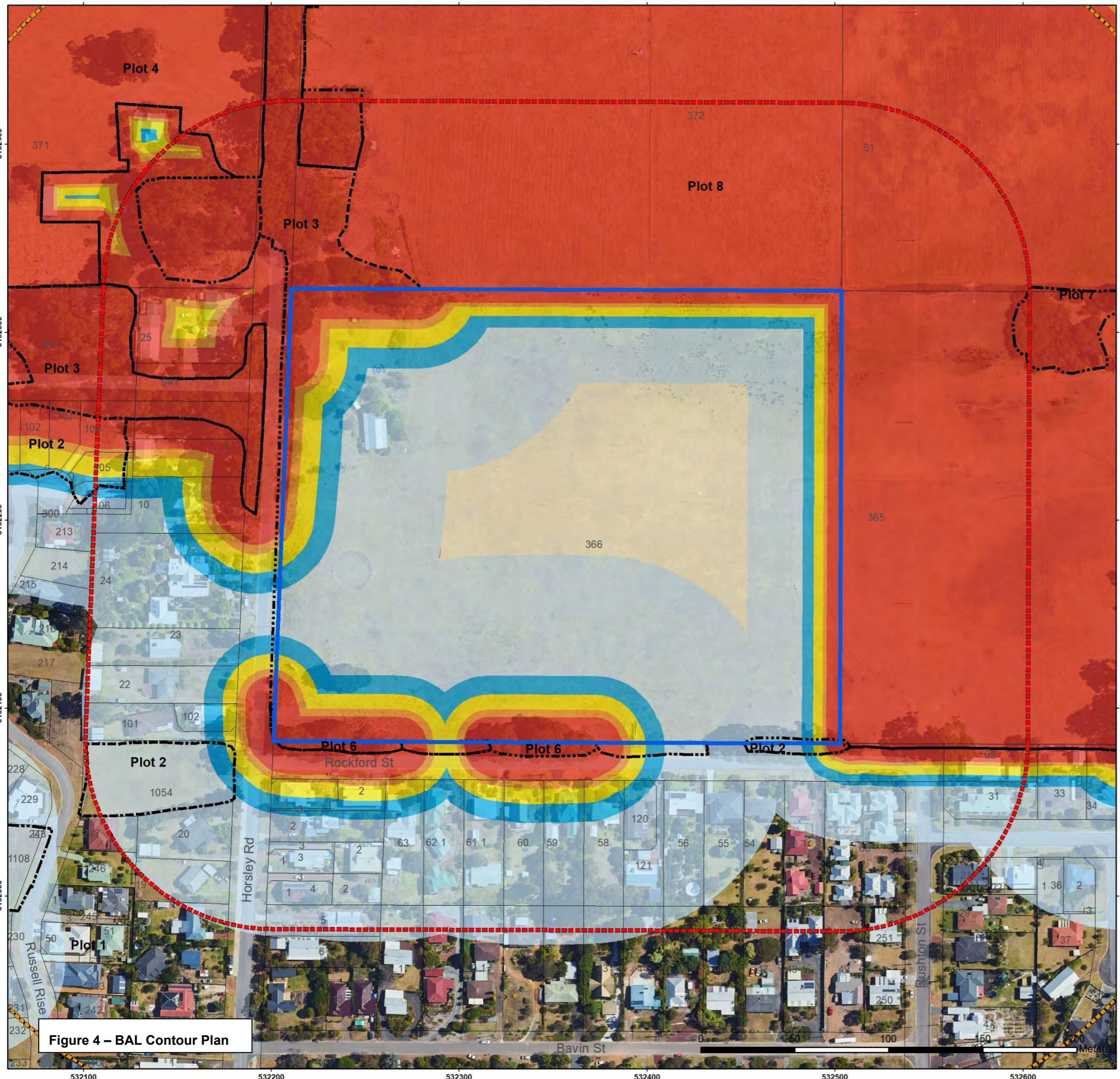


Figure 4 – BAL Contour Plan

This BAL Plan was prepared by:
 Kathryn Kinnear, Bio Diverse Solutions
 Accreditation No: BPA D30794
 Jurisdiction: Level 2 - WA

BPAD
 Bushfire Planning & Design
 Accredited Practitioner
 Level 2

BIO DIVERSE SOLUTIONS

29 Hercules Crescent
 Albany, WA 6330
 Australia
 Tel: 08 9842 1575
 Fax: 08 9842 1575

Overview Map Scale 1:100,000

Legend

- Subject Site
- 100m Assessment Boundary
- 200m Assessment Boundary
- Cadastre
- Vegetation/Plot Boundary

BAL Contours

- BAL-FZ
- BAL-40
- BAL-29
- BAL-19
- BAL-12.5
- BAL-LOW

Data Sources

Aerial Imagery: WA Now, Landgate Subscription Imagery
 Cadastre, Relief Contours and Roads: Landgate 2017
 IRIS Road Network: Main Roads Western Australia 2017
 Overview Map: World Topographic map service, ESRI 2012

CLIENT Robert Spencer
 Amaroo Care Service Inc
 Lot 366 (No. 68) Horsley Road
 Denmark WA 6333

BAL Contour Plan

BAL Assessor	QA Check	Drawn by
JB	KK	CC
STATUS	FILE	DATE
FINAL	MSC0266	3/12/2019

SECTION 4: Identification of Bushfire Impacts

Bushfire Hazards

The bushfire impacts associated with the subject site are the remnant vegetation to the west and north west private property and the internal and external paddock areas to the north and east. To the south, south west and south east there is predominantly urban/residential areas whereby the risk of fire run is limited into the site. Small isolated patches of Woodland Type B occur in the Rockford Street reserve. The bushfire risks of the remnant forested area (west and north west) present an “Extreme” Bushfire Hazard Level (BHL) as defined by the *Guidelines for planning in bushfire prone areas* (WAPC, 2017). Under hot, dry and unstable conditions (Severe to Catastrophic/bushfire weather) the subject site is most at risk of a bushfire from the north, north east and north west.

The extreme BHLs to the north-west and west are located outside of the subject site and not within the control of Amaroo Care Services Inc. To achieve setbacks from the north out of BAL FZ and BAL 40 zones the following table applies, refer to Table 2 – Setbacks to Achieve BAL 29 or less and the “Developable area” on the Issues Mapping - Figure 5.

Table 2 - Setbacks to Achieve BAL 29 or less

Setback Required to Achieve BAL – 29					
Plot Number	Vegetation Classification	Effective Slope Degrees	BAL Rating	Minimum Separation Distance Required (metres)	Current Separation Distance (metres)
3	Class A - Forest	Flat/Upslope	BAL-29	21	0
6	Class B Woodland	0-5° D/S		17	0
8	Class G Grassland	0-5° D/S		9	0
Setback Required to Achieve BAL – 19					
Plot Number	Vegetation Classification	Effective Slope Degrees	BAL Rating	Minimum Separation Distance Required (metres)	Current Separation Distance (metres)
3	Class A - Forest	Flat/Upslope	BAL-19	31	0
6	Class B Woodland	0-5° D/S		25	0
8	Class G Grassland	0-5° D/S		14	0
Setback Required to Achieve BAL – 12.5					
Plot Number	Vegetation Classification	Effective Slope Degrees	BAL Rating	Minimum Separation Distance Required (metres)	Current Separation Distance (metres)
3	Class A - Forest	Flat/Upslope	BAL-12.5	42	0
6	Class B Woodland	0-5° D/S		35	0
8	Class G Grassland	0-5° D/S		20	0

Internal and external to the north and east of the subject site Grassland Type G presents a “Moderate” BHL. To achieve adequate separation to the Grassland Type G, it is recommended that the minimum areas of low fuel/APZ setbacks of 21m (north), 8m (west) are maintained internal and 17m (east) are maintained around the perimeter of the aged care facility. This can be achieved either through limestone mulching to or through design of perimeter road reserves to the village. The balance of land (outside of the aged care facility) is to be managed by Amaroo Care Services Inc, however may be sold to another party, hence the control of any low fuel area should be contained within the aged care facility or located in future public road reserves. Refer to Issues mapping Figure 5.

If the Table 2 setbacks are implemented to the proposed aged care facility, then compliance with Acceptable Solution A1.1 and A2.1 can be achieved (Location/ Siting and design respectively). This can be detailed in a full Bushfire Management Plan as per Appendix 4 of the Guidelines for Planning in Bushfire Prone Areas, WAPC, 2017.

Access Issues

Primary access to and from the proposed aged care facility will be via Horsley Road from South Coast Highway (to Denmark town centre). Access is required in two separate directions and available to residents at all times. Emergency Access Routes along the existing public road network for the development is shown on Figure 5. The routes outline the following:

- Route 1- Rockford Street to Rushton Street, Scotsdale Road, Horsley Road to Denmark town centre.
- Route 2 – Horsley Road to Smith Street, Wattle Way, Willow Creek Drive onto Mt Shadforth Road to Denmark town centre.

The location of the aged care facility can meet the external access requirements with access in two separate destinations (compliant to Acceptable Solution 3.1, WAPC, 2017, as per Appendix 4 of the Guidelines for Planning in Bushfire Prone Areas, WAPC, 2017).

The Aged Care facility is to ensure there are two separate entry/exit points to ensure two destinations are achieved, therefore access will be required into and out of the facility off Rockford Street and Horsley Road. Refer to (hypothetical) Access Points as marked on Figure 5. This is to be detailed in future concept plans (noting not presently marked on concept plans Appendix A).

Water issues

Reticulated water is expected to be supplied to the development, water hydrants will be required throughout the facility and a fire engineer will be required to design and certify internal water requirements. It is recommended as part of the due diligence phases confirmation from Water Corporation WA of water supply and pressure to the site can be achieved (noting that there is presently water supply issues in Denmark townsite).

Planning Requirements

The current WAPC Subdivision conditional approval (WAPC 156593) for 22 lots in the eastern portion of the subject site has only one condition relating to the bushfire risks (condition No 22). The WAPC condition relates to a notification on title (Section 165 of the *Planning and Development Act 2005*) which is a standard condition relating to the designation of the WA Bushfire Prone Area Mapping.

The WAPC Advice notes refers to retention of trees in the crossover to Rockford Street and the tree protection/retention removal plan (advice note 3.). It is noted that individual trees along the Rockford Street do not increase the bushfire risks, as trees in a maintained state (as per WAPC APZ standards

Appendix C of this document) do not present bushfire risks (presently mapped as Woodland Type B in the vegetation classes due to the “unmanaged” state of the road reserve).

An aged care facility is defined under State Planning Policy (SPP) 3.7 as a “Vulnerable Land use”. The policy outlines that aged care facilities requires special planning considerations when being developed in bushfire prone areas. A full Bushfire Management Plan (BMP) and Bushfire Emergency Evacuation Plan (BEEP) will need to be developed in accordance with State Planning Policy 3.7 and the *Guidelines for planning in bushfire prone areas* (WAPC, 2017).

It is noted that if the aged care facility site is located outside of the WA Bushfire Prone Area Mapping (Figure 2) then building to AS3959, the BMP and BEEP would not be required as part of a development application. A WAPC subdivision (super lot) subdivision would be required to separate the aged care facility out of the bushfire prone area mapping for this to be the applicable.



Overview Map Scale 1:100,000

Legend

- Emergency Access Routes
- Access Points
- APZ Separation
- Developable Area
- APZ
- Cadastre
- BAL Contours**
- BAL-FZ
- BAL-40
- BAL-29
- BAL-19
- BAL-12.5
- BAL-LOW

Scale
 1:4,500 @ A3
 GDA MGA 94 Zone 50

Data Sources
 Aerial Imagery: WA Now, Landgate Subscription Imagery
 Cadastre, Relief Contours and Roads: Landgate 2017
 IRIS Road Network: Main Roads Western Australia 2017
 Overview Map: World Topographic map service, ESRI 2012

CLIENT
 Robert Spencer
 Amaroo Care Service Inc
 Lot 366 (No. 68) Horsley Road
 Denmark WA 6333

Issues Mapping			
BAL Assessor	QA Check	Drawn by	
JB	BT	CC	
STATUS	FILE		DATE
FINAL	MSC0266		06/12/2019

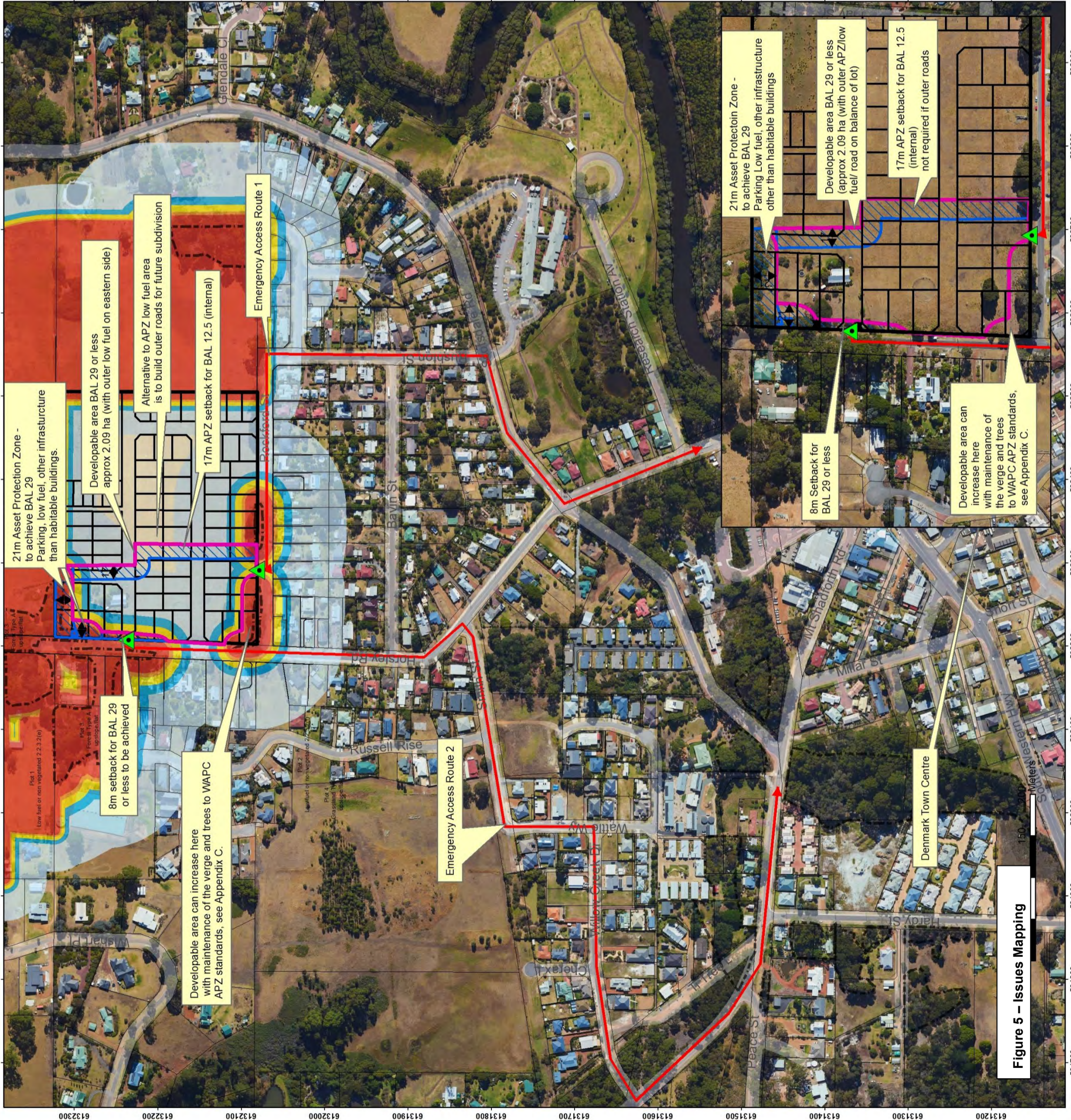


Figure 5 – Issues Mapping

SECTION 5: Recommendations arising from this assessment

The following recommendations are provided to Amaroo Care Services Inc for the future purchase and part development of Lot 366 Horsley Drive Denmark into managed care facility.

Bushfire Hazards

1. If future buildings are located in the Bushfire Prone area mapping, prior to building approval of any future Class 1, 2 and 3 buildings (as defined by the BCA), certification to AS3959-2018 will be required.
2. Setbacks to achieve BAL 29 or less are outlined on Table 2 and should be considered when preparing any design elements of the aged care facility.
3. Low fuel zone zones to achieve APZ setbacks apply to the west, north and east, this is to be incorporated into the design either through landscaping, placement of non-habitable features/buildings, limestone mulching or perimeter road reserves.
4. Where BAL FZ and BAL 40 prevails over the subject site it is recommended that the “non-habitable” components of the land use are developed in this zone (i.e. landscaped low fuel gardens, parking, recreation areas, garden sheds etc.).
5. Any internal landscaping areas are to conform to WAPC Asset Protection Zone Standards (APZ) as outlined in Appendix C of this report. A concept landscape plan is to be developed with the D.A. and approved by the appointed bushfire practitioner prior to lodgement of the D.A. with the Shire.

Access Requirements

6. Development of the concept design is to ensure the aged care facility has two separate entry/exit points to ensure two separate destinations are achieved for emergency access/egress. Access points will be required into and out of the facility off Rockford Street and Horsley Road.

Water Requirements

7. Reticulated water is expected to be supplied to the development, water hydrants will be required throughout the facility and a fire engineer will be required to design and certify internal water requirements.
8. Confirmation from Water Corporation WA is sought to ensure a potable water supply and required water pressure to the site can be achieved.

Planning Requirements

9. The aged care facility is defined as a “Vulnerable land use” and the subject site is partially located in the WA Bushfire Prone Area mapping (SLIP, 2019). A full Bushfire Management Plan (BMP) and Bushfire Emergency Evacuation Plan (BEEP) will need to be developed in accordance with State Planning Policy 3.7 and the *Guidelines for planning in bushfire prone areas* (WAPC, 2017). Noting that this due diligence report can support the development of these documents.
10. Assessment to the Acceptable Solutions as per the *Guidelines for planning in bushfire prone areas* (WAPC, 2017) has not been undertaken within the scope of this report. It is noted that if no buildings are located in BAL FZ or BAL 40 (i.e. BAL 29 or less) as outlined in point 2 (above), access and water requirements are met, then it is anticipated that the subject site will meet all the requirements of the Acceptable Solutions (i.e. Location, Siting and Design, Vehicular access and Water).
11. A super lot WAPC subdivision may be required in the future to develop the aged care facility (part of the subject site used for the aged care facility). A BMP will be required to support this WAPC planning application (noting the BEEP can be developed at Development Approval Stages and not WAPC subdivision stages).

SECTION 6: DISCLAIMER

The recommendations and measures contained in this assessment report are based on the requirements of the Australian Standards 3959-2018 – Building in Bushfire Prone Areas, WAPC State Planning Policy 3.7 (WAPC, 2015), WAPC Guidelines for Planning in Bushfire Prone Areas (WAPC, 2015), and CSIRO’s research into Bushfire behaviour. These are considered the minimum standards required to balance the protection of the proposed dwelling and occupants with the aesthetic and environmental conditions required by local, state and federal government authorities. They DO NOT guarantee that a building will not be destroyed or damaged by a bushfire. All surveys and forecasts, projections and recommendations made in this assessment report and associated with this proposed dwelling are made in good faith on the basis of the information available to the fire protection consultant at the time of assessment. The achievement of the level of implementation of fire precautions will depend amongst other things on actions of the landowner or occupiers of the land, over which the fire protection consultant has no control. Notwithstanding anything contained within, the fire consultant/s or local government authority will not, except as the law may require, be liable for any loss or other consequences (whether or not due to negligence of the fire consultant/s and the local government authority, their servants or agents) arising out of the services rendered by the fire consultant/s or local government authority.

AS3959-2018 disclaimer

The survivability of buildings is also dependant on a combination of measures such as landscaping, water supplies, access, building design and maintenance. Care should also be exercised when siting and designing for these measures when constructing a building under this Standard.

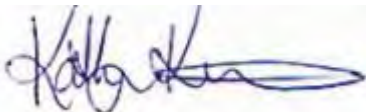
(AS3959, 2018)

This Standard is primarily concerned with improving the ability of buildings in designated bushfire-prone areas to better withstand attack from bushfire thus giving a measure of protection to the building occupants (until the fire front passes) as well as to the building itself.

(AS3959-2018)

SECTION 7: Certification

I hereby certify that I have undertaken the assessment of the above site and determined the Bushfire Attack Level stated above in accordance with the requirements of AS 3959-2018 (Incorporating Amendment Nos 1, 2 and 3) and the Guidelines for Planning in Bushfire Prone Areas Ver. 1.3 (WAPC, 2017).

SIGNED, ASSESSOR: ..  DATE:

Kathryn Kinnear, Bio Diverse Solutions
Accredited Level 2 Bushfire Practitioner (Accreditation No: BPAD30794)



References

AS 3959-2018 Australian Standard, Construction of buildings in bushfire-prone areas, Building Code of Australia, Primary Referenced Standard, Australian Building Codes Board and Standards Australia.

Western Australian Planning Commission (WAPC) (2017) Guidelines for Planning in Bushfire Prone Areas Version 1.3. Western Australian Planning Commission and Department of Planning WA, Government of Western Australia.

Western Australian Planning Commission (WAPC) (2015) State Planning Policy 3.7 Planning in Bushfire Prone Areas. Department of Planning WA and Western Australian Planning Commission.

State Land Information Portal (SLIP) (2019) Map of Bushfire Prone Areas. Office of Bushfire Risk Management (OBRM) data retrieved from:

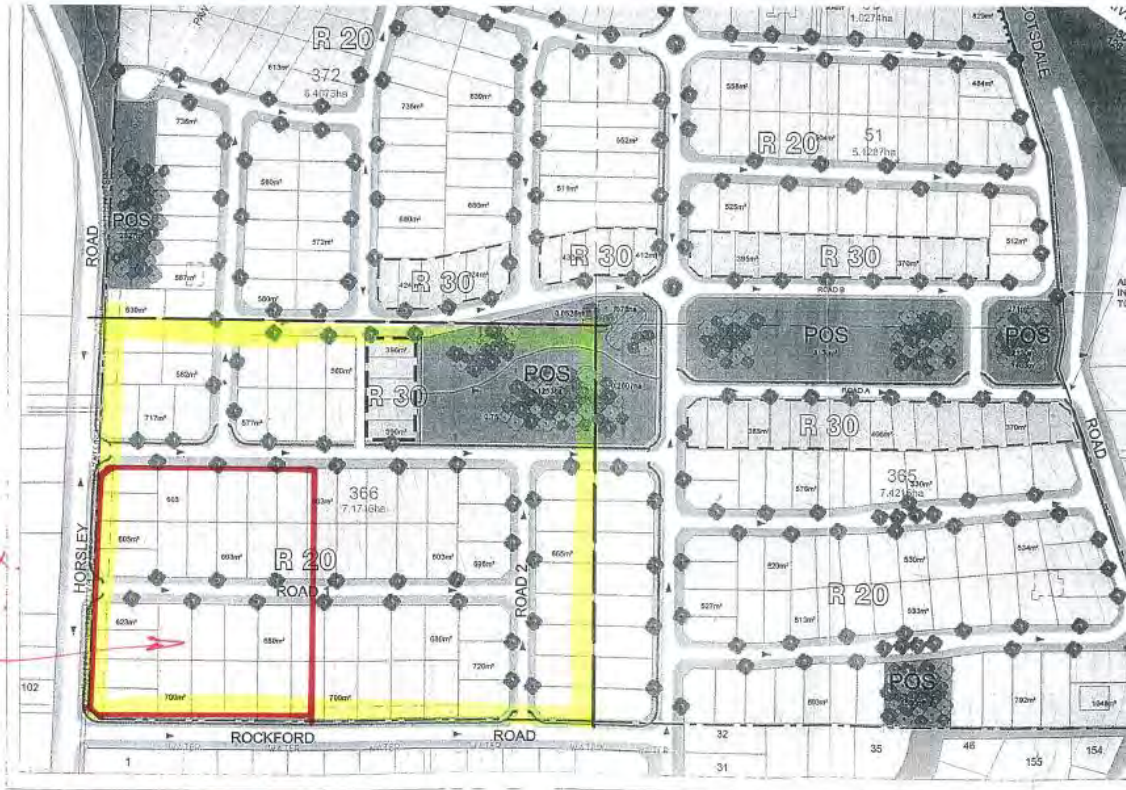
<https://maps.slip.wa.gov.au/landgate/bushfireprone/>

REVISION RECORD

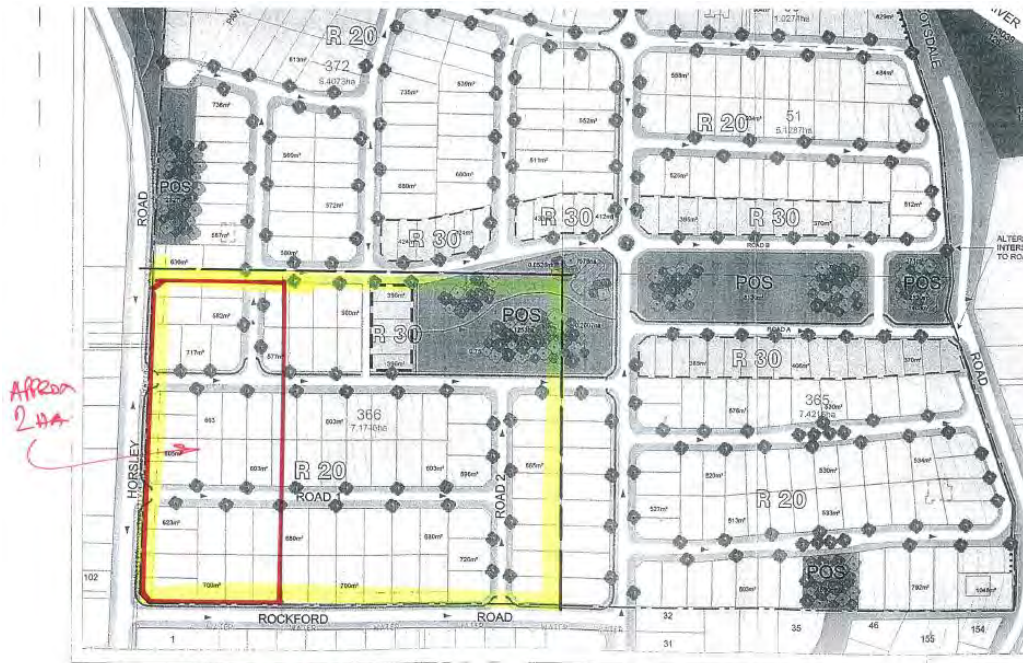
Revision	Summary	Prepared By	Reviewed by	Date
DRAFT ID 4/12/2019	Internal technical review	Jason Benson BDS	Kathryn Kinnear BDS	4/12/2019
DRAFT ID 5/12/2019	Internal technical review	Kathryn Kinnear BDS	Bianca Theyer BDS	5/12/2019
FINAL ID 6/12/2019	Issued to client as final	Kathryn Kinnear BDS	Rob Spencer Amaroo Care Services Inc	6/12/2019

Appendix A

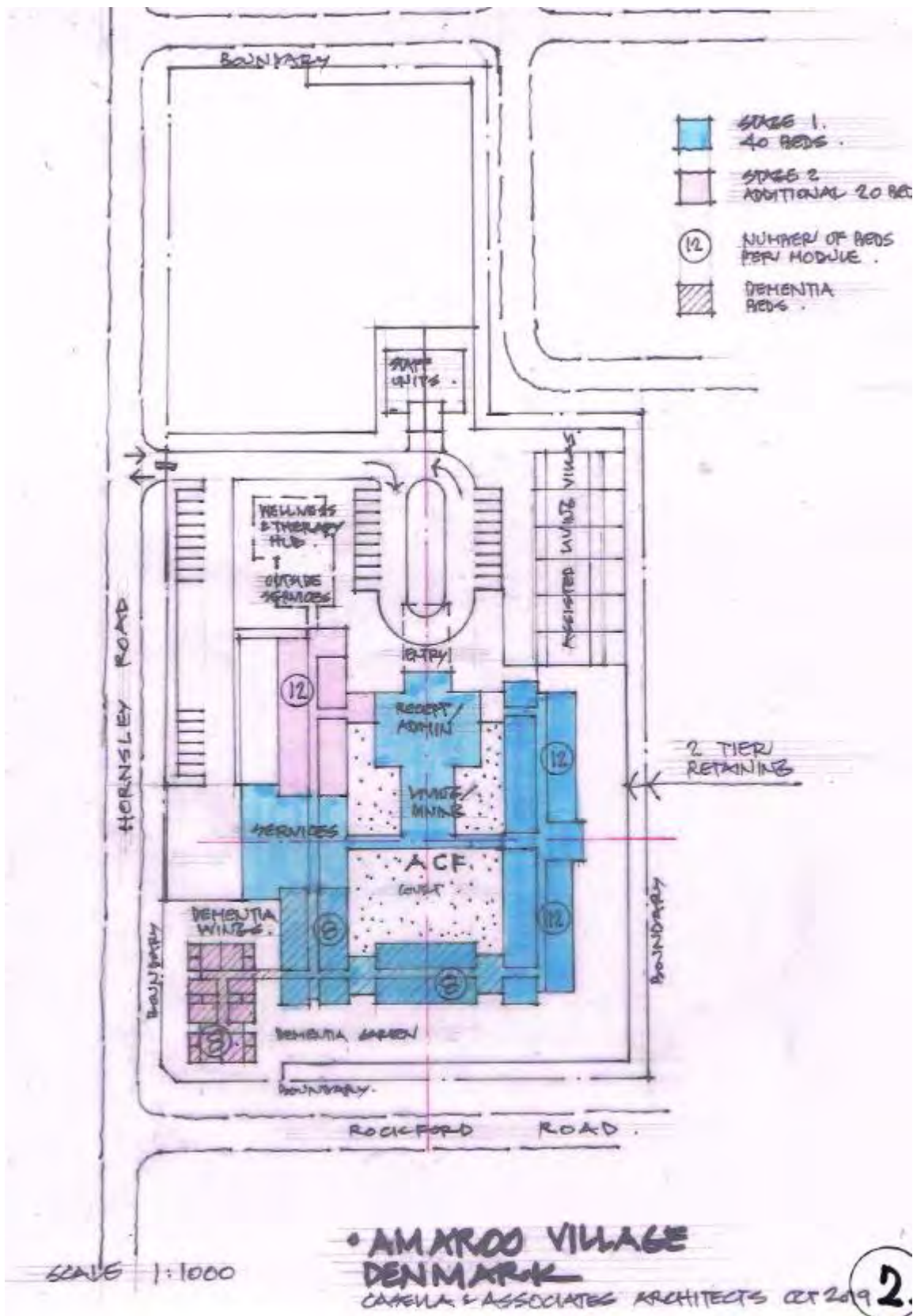
Amaroo Care Services Inc preliminary concept design options

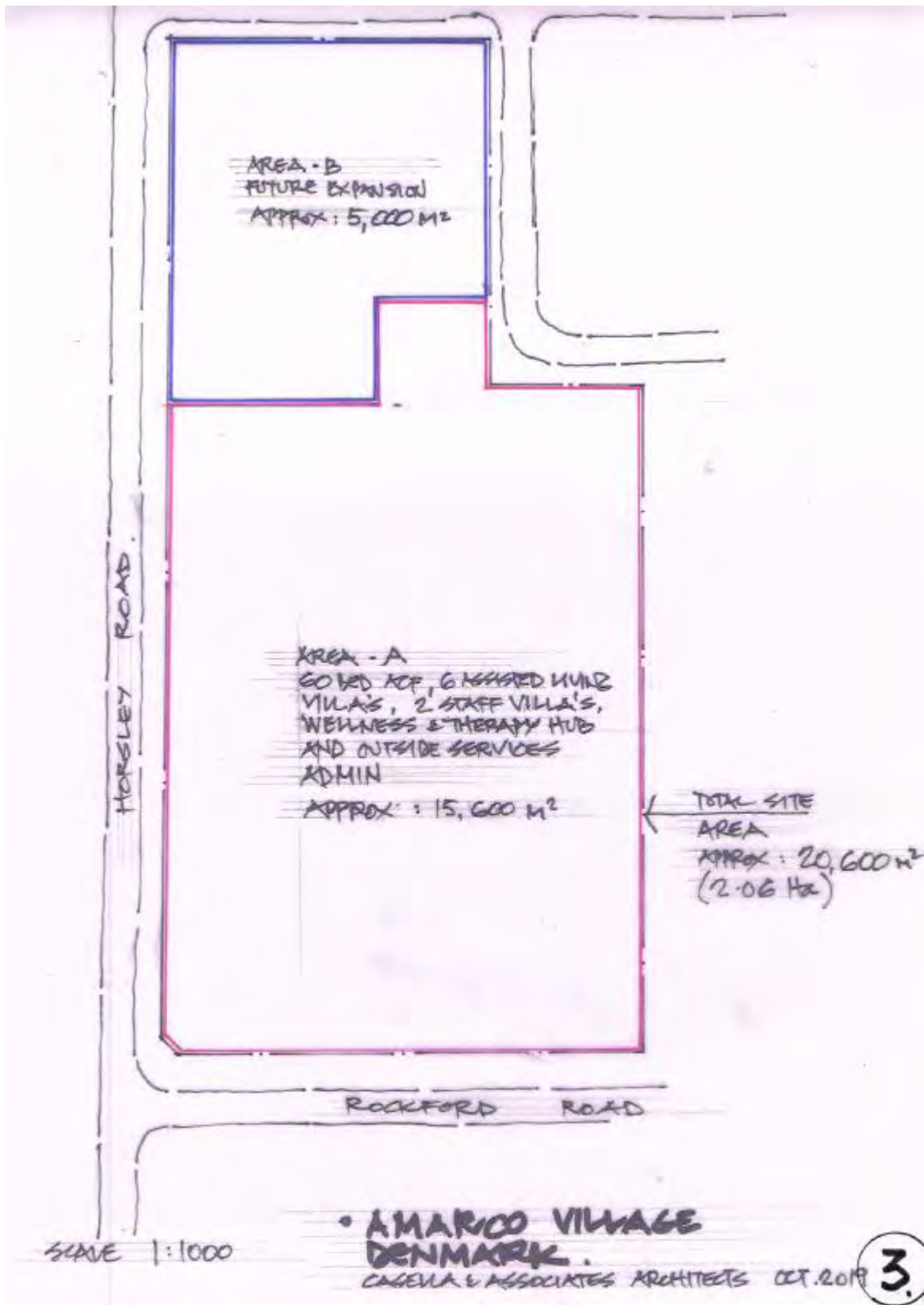


OPTION 1



OPTION 2.





Appendix B

WAPC approved Local Structure Plan & WAPC 22 Lot Subdivision approval

ALL AREAS AND DIMENSIONS ARE SUBJECT TO SURVEY

Local Structure Plan
 Horsley Road & Rockford Road
 Shire of Denmark

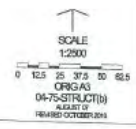
Lot No.	LOT AREA	YIELD
Lot 50	1.0274ha	11
Lot 51	5.1287ha	65
Lot 365	7.4216ha	82
Lot 366	7.1746ha	80
Lot 372	8.4073ha	105
TOTAL	29.1596ha	343

LEGEND

- Direct access to Scotsdale Road
- Prohibited/Uniform Fencing
- Dual Use Path
- Foot Path
- 7.5m Building Setback
- Water Easment
- Drainage Basin
- Landscaping & Planting
- Flood Routing

MELVISTA PARK PTY LTD
 80X 331, NORTH BEACH, WA 6020
 PHONE 9448 8911 FAX 9263 1498

Aydon Taylor Burrell
 Consulting in Law & Regional Planning
 1124th St, Albany, Western Australia 6170
 Phone: 08 9422 2234 Fax: 08 9422 1342





PLAN OF SUBDIVISION

Lot 366 Rockford Street
Shire of Denmark

LEGEND

- Subject Land
- Existing Lot Boundaries
- Proposed Lot Boundaries
- Future Lot Boundaries
- Existing Vegetation
- Roadside Trees
- Existing Buildings
- Indicative Retaining
- Telstra
- Western Power Overhead
- NBN
- Water
- Sewer

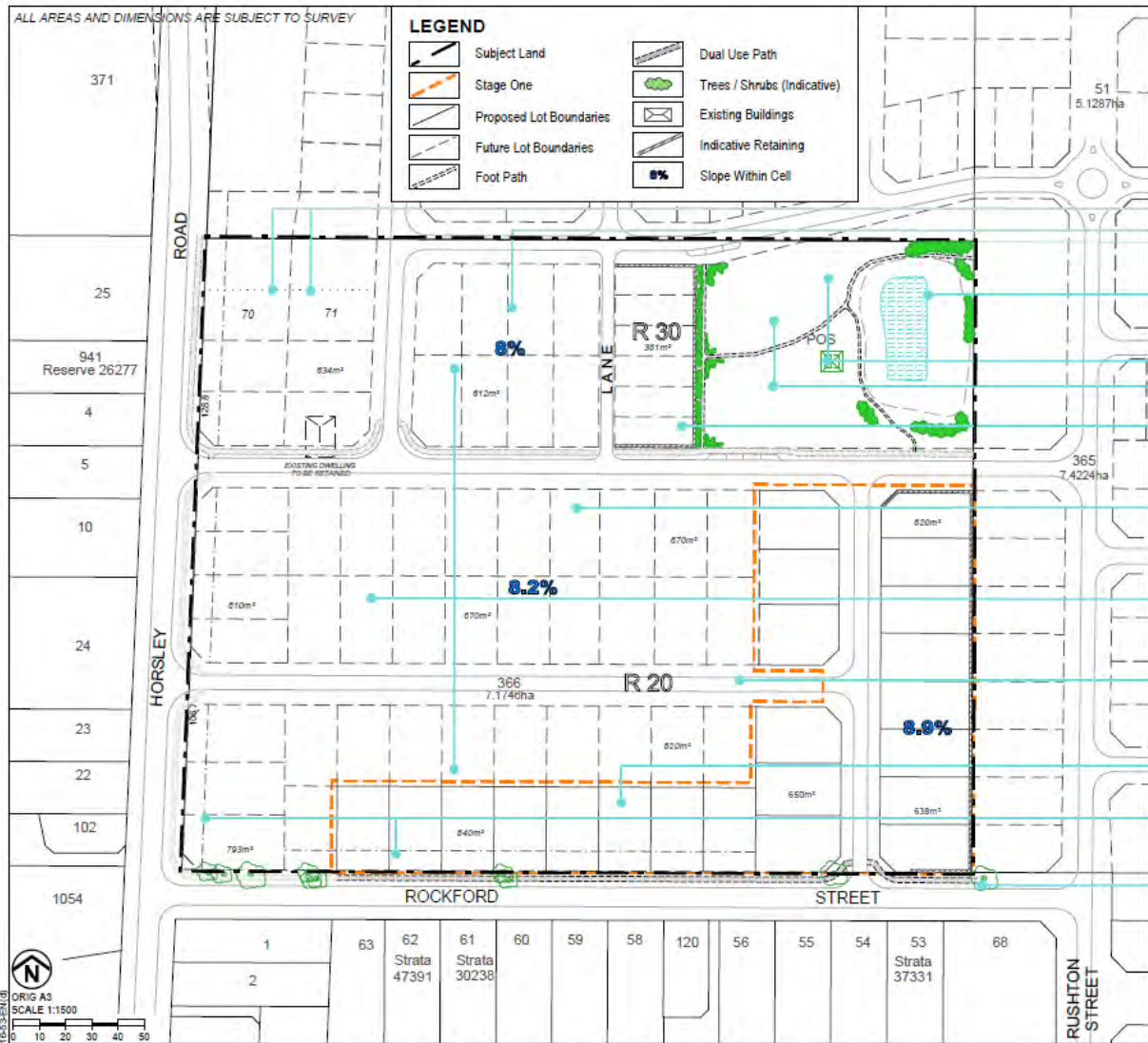
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SUMMARY

Existing Lot 366	7.1746ha
Number Proposed Lots	78
Number Proposed R20	72
Average R20 Lot Area	656m ²
Number Proposed R30	6
Average R30 Lot Area	361m ²
POS Area	8176m ²
POS %	11%
Drainage Allowance	1000m ²

AYTON BAESJOU
PLANNING
5/9 Peels Place
ALBANY WA 6330
Ph 9842 9304 Fax 9542 8494





PLAN OF SUBDIVISION
Explanatory Notes
Lot 366 Rockford Street
Shire of Denmark

Group Lots as 70 & 71 to ensure individual lots have access in building areas of BAL 29 or less. Retained as final stage of Balance of Title pending road access.

Landscaped drainage basin designed and integrated into future POS as a passive vegetation feature. Allowance made for up to 2437m² (actual basin size 630m²).

Landscaped passive tree/shrub area.

Open grassed areas suitable for informal active open space use.

Design Guidelines/DAP prepared for Cottage lots covering setbacks, retaining, POS surveillance, construction form and style, parking and access.

Lots widened to allow for more effective pole based construction.

Slopes within manageable ranges common in Denmark Townsite and ideal for pole based construction. To be guided by D.A.P.

Roads running down slope provide for sewer, water and power services to be located in road reserves. Lot easements avoided.

Stage 1.

Larger Setbacks (7.5m) provided to Horsley and Rockford Roads (frontage lots only) to meet existing streetscape character.

Trees retained.

AYTON BAESJOU
PLANNING
59 Peels Place
ALBANY WA 6330
Ph 9842 2304 Fax 9842 8494

Appendix C

WAPC Asset Protection Zone (APZ) standards to apply

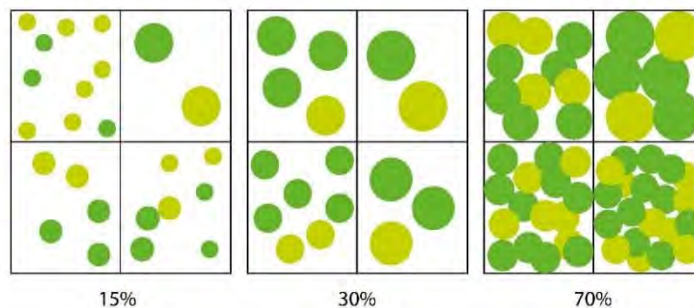


ELEMENT 2: SITING AND DESIGN OF DEVELOPMENT

SCHEDULE 1: STANDARDS FOR ASSET PROTECTION ZONES

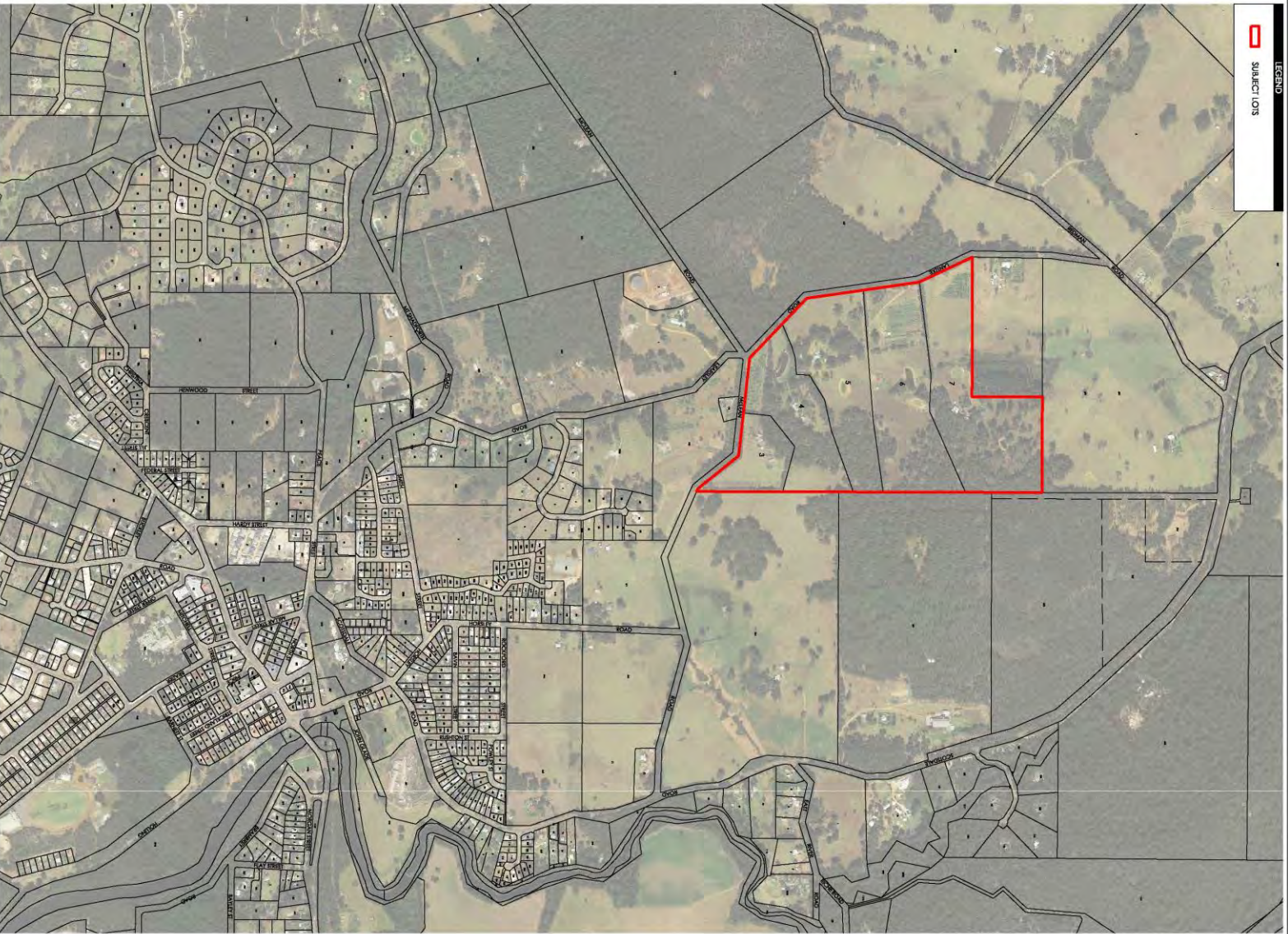
- **Fences:** within the APZ are constructed from non-combustible materials (e.g. iron, brick, limestone, metal post and wire). It is recommended that solid or slatted non-combustible perimeter fences are used.
- **Objects:** within 10 metres of a building, combustible objects must not be located close to the vulnerable parts of the building i.e. windows and doors.
- **Fine Fuel load:** combustible dead vegetation matter less than 6 millimetres in thickness reduced to and maintained at an average of two tonnes per hectare.
- **Trees (> 5 metres in height):** trunks at maturity should be a minimum distance of 6 metres from all elevations of the building, branches at maturity should not touch or overhang the building, lower branches should be removed to a height of 2 metres above the ground and or surface vegetation, canopy cover should be less than 15% with tree canopies at maturity well spread to at least 5 metres apart as to not form a continuous canopy.

Figure 16: Tree canopy cover – ranging from 15 to 70 per cent at maturity



- **Shrubs (0.5 metres to 5 metres in height):** should not be located under trees or within 3 metres of buildings, should not be planted in clumps greater than 5m² in area, clumps of shrubs should be separated from each other and any exposed window or door by at least 10 metres. Shrubs greater than 5 metres in height are to be treated as trees.
- **Ground covers (<0.5 metres in height):** can be planted under trees but must be properly maintained to remove dead plant material and any parts within 2 metres of a structure, but 3 metres from windows or doors if greater than 100 millimetres in height. Ground covers greater than 0.5 metres in height are to be treated as shrubs.
- **Grass:** should be managed to maintain a height of 100 millimetres or less.

LEGEND
SUBJECT LOTS



REGIONAL CONTEXT PLAN
LOT 3 MCLEAN ROAD AND LOTS 4, 5, 6 & 7 LANTZKE ROAD, DENMARK
FIGURE 2

PREPARED BY: SARA WILLIAMS | TOWN PLANNER
DATE: 13/09/2021 | 11:50 AM
SCALE: 1:1000
PROJECT: 19/2021/0000

0m 100m 200m
WILLIAMS CONSULTING



21 Sept 2021 - Attachment 9.1.2a

SCHEDULE OF SUBMISSIONS

Submissions Received from Public – Proposed Amendment to Horsley Rockford Structure Plan – Lot 366 Horsley Road Denmark

Ref No.	Name & Address Details	Verbatim Submission	Planning Services Comment
S1	REDACTED	<p>As the owners of adjoining REDACTED we support the Amendment as advertised with the following modifications: -</p> <ol style="list-style-type: none"> 1. The report should identify that the new subdivision road between lots 366 and 372 is to be 2/3 on lot 366 and 1/3 on lot 372 (or thereabouts) as required by the Shire to allow Amaroo to construct this road when their development takes place. It is difficult to identify the road reserve split on the amended structure plan and suitable dimensional reference is required in the report. 2. The report should also nominate that this boundary road is proposed to be constructed as part of the first stage of Amaroo's development, as initially proposed by Amaroo. The Amendment shows the new road reserve encroaching into our REDACTED; removing our proposed 630m2 residential lot (as shown in the attachment) and extending the POS reserve southwards. This residential lot was proposed to accommodate our retirement home. We agree to relinquish this proposed lot if the proposed road is constructed in the first stage of Amaroo's development. This new road is important as the owners of lot 371 to the west propose only to subdivide their lot in two and have no intention of subdividing their land further. This means Horsley Road will not be extended northwards within their lot in the foreseeable future. 3. The southerly extension of the small POS reserve mentioned in the preceding paragraph appears to absorb the balance of the proposed 630m2 lot without qualifying that the POS contribution should be a maximum of 10% and that some reduction in contribution is appropriate, perhaps at subdivision stage. 	<p>Upheld (in part)</p> <p>Sharing roads across boundaries commonly causes timing issues in structure plans when it comes time to subdivided or develop.</p> <p>The submission is supported, the Aged Care Facility is likely to proceed first and should be capable of developing a road independently of Lot 372 to the north.</p> <p>The adjustments to the road alignments proposed introduce a portion of a new road into Lot 372 that Lot 372 did not have to provide previously. This has the benefit of providing independent access from Horsley Road through to Lot 372 without necessitating a substantial extension of Horsley Road. It should be noted that unless this new road reserve was located largely inside Lot 372, access to Lot 372 will remain reliant upon the timing of development on Lot 366.</p> <p>It is recommended that the structure plan be amended to show at least 2/3 of the road reserve is located within Lot 366.</p> <p>The changes to the road arrangement make access to Lot 372 from the constructed part of Horsley Road more likely than is currently the case.</p> <p>If the owner of Lot 366 built the road between Lot 366 and Lot 372 as part of stage 1 of their development it would be a good result in that it may facilitate further subdivision of the surrounding area. It is also highly likely to be required as part of any bushfire management plan which would require an alternate two access/egress points for a 'vulnerable land use' such as an Aged Care Facility. But to <i>require</i> the construction of this road as part of the first stage of development through the structure plan is not seen as fair and reasonable.</p> <p><u>Public Open Space (POS)</u></p>

			Existing Structure Plan identifies Lot 366 as ceding a total of 10.5% of the land area, no change to this is proposed as part of the amended structure plan.
S2	REDACTED	<p>I am writing in response to the above stated Local Structure amendment plan regarding the development of Lot 366 Horsley Road.</p> <p>I am a long standing resident of Rockford street Denmark and consequently have a deep connection to, and investment in both the safety implications for some aspects of the proposed development and the natural environment.</p> <p>I applaud the plan as a dignified response to the aged population in Denmark however I would like make the following points:</p> <p>DRAINAGE:</p> <p>It appears that the drainage system for Amaroo Village and the subdivision will be leveraging off the Rockford Street drainage network. This system is at full capacity. It is critical that this point be considered and planned for to include the development of a drainage system to service Amaroo Village and subdivision that is separate to that already in existence for Rockford Street.</p> <p>The Shire engineer and Building Inspector Graham Blackmore are very aware that the drainage for Rockford Street is working at and over capacity with subsequent problems arising for residents in Rockford street and beyond.</p> <p>The residents of Rockford street have always had to deal with this huge drainage problem. E.g.: Number 6 Rockford Street has had to insert two industrial sumps to deal with this deluge running into her property.</p> <p>ROAD ONE:</p> <p>We oppose Road One.</p> <p>The proposed Road One which is planned for those turning left approximately 5-6 houses from the corner of Horsley Road and Rockford Street has several dangerous aspects to be considered. Cars often speed up Horsley Road and regularly cut the corner as they enter Rockford Street. This is a blind corner not easily sighted until you are upon the turn.</p> <p>The possibilities for an accident increase exponentially with the planned Road One, for the residents of Rockford Street, it adds congestion and a significant increase in local traffic, associated noise, lack of privacy and drainage problems. Road One is on a slope heading downhill in Rockford Street, North South, which will be a huge concern with winter rains and winder deluge.</p> <p>Given Amaroo Aged Care will be accessed from Horsley Road and the planned New</p>	<p>Upheld (in part)</p> <p>Support for aged accommodation noted.</p> <p><u>Drainage</u></p> <p>The existing structure plan shows that most drainage from future development will be directed back into a centrally located public open space (POS) area with drainage basins. The direction of drainage is shown by arrows in the proposed roads.</p> <p>The proposed amendment makes no change to the proposal, therefore drainage design from future residential development will be directed away from Rockford Road.</p> <p>The future development of an Aged Care Facility will be a single development application that will need to show how it is dealing with stormwater on site and accommodate overland flow paths in a storm event. Given the topography, little water in a storm event would be directed to Rockford Road. However, it should be acknowledged that in a storm event roads naturally act as the overflow route.</p> <p><u>“Road One”</u></p> <p>This is a road proposed along the eastern boundary of the Aged Care Facility connecting through to Rockford Road. It is likely to have been provided as a public interface with the Aged Care Facility and to keep a permeable road pattern. It can be argued that more roads allow for traffic to dissipate throughout a subdivision area and reduce the impact at any one intersection.</p> <p>However, on balance the road is not required to provide access to residential lots, does constitute an additional vehicular access point, and isn’t required for access to the proposed Aged Care Facility.</p>

	<p>North Road (in the new subdivision), the proposed Road One seems unnecessary. All the R 20 blocks are accessible from Rockford Street and 3 other Roads in the new subdivision. Rockford Street is a very small street, with no access to amenities. This seems excessive.</p> <p>Another alternative suggestion would be to turn proposed Road One into a walk way enhancing opportunities for both the residents of Amaroo and the local to build relationships and community wellbeing through provision of socially inclusive settings.</p> <p>ROAD TWO: We oppose Road Two. The proposed Road Two would also carve up Rockford Street making it extremely busy and congested with traffic. This road is not necessary for this new subdivision. There will be Roads and Streets accommodating all blocks in the new subdivision, with various other entry and exit points onto 4 major Roads leading to amenities. Significantly these roads/streets and drainage systems will need to be maintained by the Denmark Shire and must be factored in as an ongoing expense. In today's climate why not make Road Two also walk way, giving people more walking space for health reasons as mentioned before.</p> <p>7.5METRE BOUNDARY SETBACK FROM SHIRE VERGE: As a blanket ruling for all people planning a build in the Denmark Shire, State Government Planning policy (Planning and Development Act 2005) rule that there needs to be a 7.5 metre set back from the Shire verge. We strongly advocate that this building code is respected by Amaroo Aged Care and Subdivision development.</p> <p>LOCATION OF AREAS FOR AMAROO VILLAGE: Given the frequent usage and thoroughfare of Horsley Road / Rockford Street intersection, it seems an unusual decision to locate the Dementia section of Amaroo Village within proximity to this corner. Best practice supporting people with dementia speaks to safe, predictable environments. A suggestion would be to centre the needs of these people and to locate their section to the rear of the village where there is less traffic hazards and more serenity.</p> <p>TREES: The large KARRI and MARRI trees on Rockford Street and Horsley Road soak up huge amounts of ground water in autumn and winter. This should be taken into consideration. These large trees on Horsley and Rockford are corridors for wildlife and have become a refuge for many endangered species over time. It is well known by locals that these trees cool the area in summer and have become a refuge and food supply for: Tawny Frogmouths, Boobooks, endangered Carnaby Cockatoos, Cuckoo Shrike, Martin Swallows, Possums, Bats, Phascogales to name a few. Last but not least The Rockford Street children plan in these trees whenever they get the</p>	<p>It is recommended that this be converted to a pedestrian access way to keep the future subdivision design permeable to pedestrians and cyclists whilst allowing for extension of services (drainage, water, sewer & power) if required and reduce potential impact upon existing roadside vegetation.</p> <p><u>"Road Two"</u></p> <p>This road was approved as part of the existing structure plan. It serves a role in keeping road lengths to a minimum, directs drainage back toward the central POS and allowing each lot to continue to subdivide independently of each other.</p> <p>It is recommended the "Road Two" be retained as per the existing structure plan alignment.</p> <p><u>7.5m Boundary Setback</u></p> <p>Clause 5.1 of the Scheme identifies a 7.5m front setback and 3m side setback for land uses that are not addressed by the R-Codes. This is also shown on the amended Structure Plan and will be used as a starting point when assessing a future development application.</p> <p><u>Future Design of Amaroo Village</u></p> <p>Whilst an <u>indicative</u> plan for the future development of the Aged Care Facility was included with the bushfire assessment, this does not form part of the Amendment Structure Plan proposal.</p> <p><u>Trees</u></p> <p>As noted by the applicant, it is not the intention to remove roadside vegetation. Previously approved subdivision applications over Lot 366 highlighted the need to retain the roadside vegetation. An arborists report was undertaken at the time and some diseased and dying trees were permitted for removal but good quality vegetation was to be retained.</p> <p>The Bushfire Management Plan appended to the amended structure plan states "Hazards reduced in road reserve via service provision. Identified significant trees to be retained."</p>
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	<p>chance. Many of these trees exceed 100 years in age and it seems counter to the environmental conscience of Denmark.</p> <p>MORETON BAY FIG TREE: The Moreton Bay Fig Tree also over 100 years and such an integral element of Denmark's environmental history. Rather than remove the Moreton Bay Fig tree, it could be utilised as part of the aesthetic landscape like the approach used in the Fig Tree Plaza. A centrepiece of great beauty and shade for residents, staff and visitors of Amaroo, a place to gather and connect with each other. This majestic tree is a marvel to look at, not a fire hazard and like the Karri and Marri a habitat for many of the south coasts native animals and birds.</p> <p>I hope that these comments highlight some alternative possibilities to potential safety risks and environmental losses.</p> <p>PROPOSED RETAINING WALL FOR AMAROO VILLAGE</p> <ol style="list-style-type: none"> 1) These walls are used to retain fill and serve no purpose other than to build the site up. It will also impact our street scape. There will be no inlet views to be gained by this, only roof and tree tops. <p>IMPACT OF WALL</p> <ol style="list-style-type: none"> 2) The walls and fill will also impact on the health of the 100-year-old trees on the verge by damaging the roots zones and create drainage problems. <p>LAY OF THE LAND</p> <ol style="list-style-type: none"> 3) The Amaroo Village Development would need a flat site to accommodate all buildings. A much easier solution to this problem, would be to lower the high point of the site. This would give Amaroo a flat site that they require without dominating the Horsley Road and Rockford Street scape and create less drainage problems. No effort has been made in Amaroos submission to accommodate the natural slope of the land. 	<p>This vegetation is not required to be removed for servicing or access to the site. The large trees in the road reserve would not trigger a higher 'Bushfire Attack Level' (BAL) consideration unless coupled with substantial low and mid-storey vegetation.</p> <p>It is recommended that the amended Structure Plan be annotated with a statement "vegetation in the road reserve to be preserved wherever possible".</p> <p>It should be noted that there is always a caveat with this statement that weeds, diseased or dying trees may be removed.</p> <p>It is acknowledged that the Moreton Bay Fig tree near the southwestern corner of Lot 366 is a large, old tree and offers amenity and has some historical significance. However, the tree does not appear on any significant tree list (previously included in the Municipal Heritage Inventory) is non-native and located well within private property.</p> <p>It is recommended that annotation be placed on the amended structure plan <u>encouraging</u> retention of the tree only.</p> <p><u>Retaining walls</u></p> <p>The applicant has confirmed that the indicative development plan provided with the BMP is not reflective of current thinking and was prepared to inform a preliminary bushfire and some due diligence works.</p> <p>The Shire will require that changes in levels as part of the development application will occur within the development and not at the edges. The applicant and the structure plan document identify the western portion of Lot 366 as having the gentlest slopes in the immediate area.</p> <p>It is recommended that an annotation be placed on the amended Structure Plan requiring retaining and changes in levels to be achieved generally through the use of cut and fill techniques and within the development and not at the perimeter of the site.</p>
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S3	REDACTED	<p>I am writing to support the residents of Horsley Rd and Rockford Rd, in keeping Lot 366 a residential zone. I don't believe this site is a desirable site for a large facility. I feel that I need to have a say in the development of Horsley Rd as my family have lived on the site, REDACTED. from 2014 - 2020 and I am very familiar with the landscape. My personal reasons for preference of the hillside being used for residential housing development in the future as opposed to a large facility at the top of the hill are included in the following points.</p> <p>A vast building consisting mostly of concrete, requiring a flat surface will need extensive earth works and this require considerations towards;</p> <ul style="list-style-type: none"> - Underground freshwater streams (there are several underground streams weaving through the hillside, which cause the surface ground to move up and down, shifting yearly. The soil consists largely of CLAY which rises and falls, which you can visually see as pot holes in the landscape. These potholes tend to shift. - The top of the hill is not level, it is very undulating and would require a high level of earth works, unless the proposed building was terraced. The document states that the amendment design is minor, however I believe this might be incorrect because, if carried out, the earth works needed to create a flat space would be major. - Aesthetic sensitivity for the local residents who live on the hillside needs to be highly considered. The disruption to the natural environment for local people will be significant and may be stressful and somewhat destroy the quality of peace that people on the hillside currently favour. A large facility will bring business and more traffic to the site. - A concrete building requiring heavy landscaping will negatively impact the ecosystems. Pygmy possums have been sited on this hillside. The surrounding trees are nesting sites for white tailed cockatoos. - The existing old trees are deep rooted and filter the underground streams. The large old Moreton Bay Fig situated on the corner of Rockford Rd and Horsley Rd is home to Pygmy Possums, bird life, and contains its own microcosm of life. This iconic tree should be protected. - As stated, the Amaroo Village Aged Care Facility is for people at the end of their life and it is stated therefore that the sloping nature of the hillside may not be a factor in mobility as people won't need to walk around. This however, is overlooking the needs of the family members and supporting people in palliative care, and it is not always the case that someone in palliative care is constricted to bed. I feel it is important that an aged care facility is built on level ground in a natural space with lots of trees to allow those at the end of their life easy accessibility to nature and fresh air, and the ability for family members to walk with their loved ones outside, if still possible, is quite important. - I am not alone in the vision of Lot 366 Horsley Rd being used for residential housing. It would be timely to consider using the space for a community housing project, consisting of eco housing, with sensitivity to the health of the people and 	<p>Noted</p> <p>Council resolved that they would consider an Aged Care Facility on Lot 366 as a Use Not Listed in November 2019. In making this determination it was agreed that this type of facility is appropriately located in the Residential zone.</p> <p>Issues with the sloping/undulating nature of the site are well understood by the applicant and Shire staff but capable of being addressed with residential scale building and a respect for the natural topography. Most issues raised are for consideration at the development application stage of the proposal.</p> <p>There remain at least 35 residential lots on the balance of Lot 366 alone.</p>
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		<p>the landscape. In this manner it would be suggested to create ½ acre or ¼ acre blocks, with a community garden project as a central focus. It would be of great significance to Denmark if the Shire would thoughtfully consider this latter point.</p> <p>I appreciate your careful consideration on this project, and use of this East facing hillside. It would be a service to the community to have this space designed with the health of the environment and the residents being the top priority. Due to the current housing crisis, and the need for homes for new families to Denmark and local families, Horsley Hill could be a beautiful place for a community living space, with clever and careful design it could be a healthy and sustainable village. I would like to highlight that Kwoorabup river is at the base of the sloping Hillside and will be impacted through any development. I feel it is important to consider how the hillside is developed and not to ‘Over develop’ it, for sake of the river, the people and the ecosystems of this place.</p> <p>Please do not allow a large facility to be built at the top of Horsley hill, in favour of the consensus of the residents, keeping it ‘residential’ and the unsuitability of the uneven land.</p> <p>Thank you for carefully considering and sharing this statement.</p>	
S4	REDACTED	<p>Planning Solutions acts on behalf of REDACTED, the owners of REDACTED, Denmark. The REDACTED home is located on the REDACTED, REDACTED the land subject to the structure plan (SPN) amendment; the purpose of which is to facilitate a Retirement Village and Residential Aged Care Facility.</p> <p>On behalf of my client, we object to the proposed SPN amendment. The reasons are outlined below.</p> <p>REASONS FOR OBJECTING</p> <ol style="list-style-type: none"> 1. There are three key reasons for objecting to the SPN amendment: <ol style="list-style-type: none"> a) The amendment to facilitate a Retirement and Aged Care development will result in the excessive filling of the land with retaining walls fronting Rockford Street of up to 4.5m in height, creating a detrimental impact on the existing streetscape and amenity of the locality. b) Trees along Rockford Street are proposed to be retained. However, excessive filling and retaining walls within 15m of the trees will impact their health and viability (a 15m wide tree protection zone aligned to the tree canopy should be required as a minimum with no fill or retaining walls allowed). c) A proposed new road intersecting with Rockford Street, opposite No. 12 and 14 Rockford Street, is unnecessary and inconsistent with the approved SPN. The proposed road should be converted to a 20m wide landscaped Pedestrian Access Way (PAW) or Public Open Space (POS). <p>Excessive filling and retaining walls</p>	<p>Upheld (in part)</p> <p>Unfortunately, the indicative plan provided with the BMP has resulted in people focussing on the detail when Council is currently considering an amendment to an existing Structure Plan. However, the “indicative plan” does serve to highlight some potential issues with the eventual development of the site.</p> <p>Some notations on the amended Structure Plan are recommended to highlight issues for addressing as part of any future development application.</p> <p><u>Retaining and fill</u> Whilst there is a 10m fall from the SW to the NE corner of the proposed Aged Care Facility site this is seen as a matter for the development stage.</p> <p>As per S2 above, it is recommended that an annotation be placed on the amended Structure Plan requiring retaining and changes in levels to be achieved generally within the development and not at the perimeter.</p> <p><u>Trees</u></p>

	<p>2. The existing SPN and associated subdivision approval (appended to the Bushfire Hazard Assessment – figure 1) proposed lots with direct frontage to Rockford Street with a 7.5m building setback line to “<i>meet [the] existing streetscape</i>”. Whilst a small amount of fill within the front setback areas of these lots may be required, there would have been minimal retaining along the Rockford Street frontage.</p> <p>3. The combination of increased building setbacks and minimal filling would have combined to create a streetscape that is consistent with, and reflective of the existing pattern of development on the southern side of Rockford Street.</p> <p>4. As outlined in the SPN amendment report, a considerable amount of fill will be required along the Rockford Street frontage to achieve a level site to accommodate the Retirement and Aged Care development. The concept plans show retaining wall heights ranging from 1.25m above natural ground level (NGL) up to 4.5m above NGL (figure 2). These retaining walls will be either on or within close proximity to the Rockford Street frontage.</p> <p>5. Retaining walls and filling to such a significant height above NGL is excessive. The retaining walls will present as an imposing structure on the existing streetscape which is characterised by single dwellings with large front setbacks. This intervention into the landscape will create a detrimental impact on the amenity of the locality. Whilst it is recognised there may be a preference for a Retirement and Aged Care development to be on a flat site, no effort made to retain the natural contours of the land.</p> <p>6. In simple terms, if the filling of the land to the extent suggested is required to facilitate the Retirement and Aged Care development, the Shire and WAPC should seriously consider rejecting the SPN amendment until an acceptable solution is proposed that better retains the natural contours of the land.</p> <p>Tree retention</p> <p>7. There are a number of significant native trees along the Rockford Street frontage and/or street verge. These are a dominant landscape element within the immediate locality and must be retained. As noted on the amended SPN, these trees appear to be within the road reserve and are labelled as being retained. This is supported.</p> <p>8. Given the amount of filling, and size of retaining walls (including their footings) that are proposed within metres of these trees, it is difficult to see how they would remain healthy and viable with such an intervention into the root zone. In addition, a new road (opposite No. 12 and 14 Rockford Street) may also result in the removal of at least one tree due to the new road.</p> <p>9. The canopies of these trees have an approximate diameter of 25 – 30m and encroach approximately 15m into lot 366. Typically, the root zone aligns with the tree canopy. If the SPN amendment is to proceed then a minimum 15m Tree Protection Zone should be included on the plan with appropriate text being inserted into Part 1 of the SPN requiring the protection zone, along with an</p>	<p>See submission S2.</p> <p>Shire officers consider it appropriate to highlight the retention of trees in the road reserve as an issue to be addressed in a development application rather than applying a generous 15m setback where the issue may be addressed in alternate manner. The standard 7.5m setback for development from the Rockford Road frontage should serve as a good starting point for the retention of vegetation.</p> <p>“Road One”</p> <p>See submission S2, above.</p>
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		<p>Arborist Report and appropriate management plans to protect the health and viability of all these trees.</p> <p>Additional road to Rockford Street</p> <p>10. The proposed SPN amendment introduces an additional road intersecting with Rockford Street, opposite No. 12 and 14 Rockford Street. It is unclear why this road is proposed. It seems unnecessary from a traffic perspective, which is reinforced by the following statement in the SPN amendment report: <i>The experience of Amaroo is that the traffic generated from an aged care facility (including ancillary activities), is substantially less than the normal traffic movements produced by typical residential development.</i></p> <p>11. The number and location of new roads intersecting with Rockford Street should be retained as per the existing approved SPN.</p> <p>12. It would be beneficial for the proposed road to be converted to a 20m wide landscaped PAW or POS. The location is strategic as it provides a direct pedestrian link from the Retirement and Aged Care development and the wider estate to Horsley Road (via Rockford Street). Horsley Road provides a direct connection to the Town Centre.</p> <p>CONCLUSION</p> <p>In conclusion, my client objects to the proposed structure plan amendment as it will result in the land being filled and retained to an extent that will have a detrimental impact on the amenity of the locality and existing streetscape.</p> <p>The proposed filling and retaining walls will also affect the health and viability of a number of substantial trees that are an important part of the existing landscape. And finally, there is no need to add a third road intersecting with Rockford Street on traffic grounds.</p> <p>Our comments and objections are summarised in figure 3 below.</p> <p>As such, we respectfully request that the proposed SPN amendment is refused in its current form.</p>	
S5	REDACTED	<p>I live REDACTED near the REDACTED. I have lived here for over 25 years. Over this time I have enjoyed a rural view along with farm animals grazing and a mob of around 80 kangaroos that also call Lot 366 home.</p> <p>The present structure plan makes way for residential housing blocks. I had always assumed that this would be the way the block would be developed in the future.</p> <p>So it came as quite a shock to receive a proposal to change this along with a 2.06 ha subdivision of Lot 366 for a private 40 bed hospital along with accommodation for relatives and staff. High care and dementia facilities included "Aged Care". My concerns are many and include</p> <p>The proposed subdivision at 2.06 ha is not large enough to accommodate the</p>	<p>Noted</p> <p>A hospital is not proposed.</p> <p>The eventual proposal is described as a "Retirement Living/Aged Care site" and at a residential scale.</p>

		<p>hospital and proposed extensions. I am concerned if approved the development will not adhere to the suggested setbacks from Horsley and Rockford roads. A 7.5mtr is suggested at present for a residential building. While a hospital is neither light industrial or commercial, it does operate 24 hours 7 days a week. I suppose it will operate a commercial kitchen and laundry and am concerned about noise and smell. I would like a 15m set back to help with this. This to be a caveat on the title if approval is granted.</p> <p>Overall I'm concerned about the need and height of retaining walls around the boundary of the subdivision. The developer sates – minimal build up required. I'm aware of the need to retain storm water etc but the dimensions of these retaining walls at 1.5 to 2.5 mtrs high and the fact they are documented in the application suggests a build up of in fill over the whole site. The proposed building needs to lowered not lifted on the site.</p> <p>We need this subdivision to blend in with existing neighbourhood not overshadow it, or dominate the street scape. I cant support the proposed amendment to the local structure plan Lot 366 Horsley Rd in its present form. I find it hard to understand and lack detail.</p> <p>Any chance of saving the trees noted on Rockford Road will require a boundary realignment with in the road reserve in my opinion.</p> <p>My suggestion if Amaroo really must build their hospital on Lot 366 is to build more towards the centre of the block, landscape the surrounding area. No need to subdivide at all. The surrounding neighbourhood will be happy. I'm sure the residents of the hospital will be happier and even the resident kangaroos win as well.</p>	
S6	REDACTED	<p>I do not feel that the development provided to residents of the effected area contains enough information to inform us of what the future impact will be on the ratepayers of the area.</p> <p>The long term residents of this area have concerns regarding our rights of objection to this proposal in a residential area.</p> <p>After consulting councillors and Craig from planning the fact that this plan for the future is mainly concerning roads and fire issues, but it has caused much anxiety to many residents.</p> <p>We look forward to better consultation with residents who require a more detailed picture of the future construction of this facility.</p> <p>Concerns – noise, large retaining walls, dust suppression during construction, lighting & landscaping.</p>	<p>Noted</p> <p>The proposal to accommodate an aged care facility at Lot 366 provides some difficulties how to fairly and transparently process the proposal.</p> <p>Council resolved in November 2019 that an Aged Care Facility was an appropriate land use in the Residential zone.</p> <p>It was acknowledged at the time that if it was to be considered on this site then the Rockford-Horsley Structure Plan would need to be amended to accommodate the land use. However, deciding to amend the structure plan before the details of the eventual development are known can create a situation where the Council feels that it has been 'railroaded' into accepting the facility.</p>

			<p>The alternative is that the applicant is required to prepare detailed plans for the facility but then finds that Council or the WAPC are unwilling to amend the structure plan to accommodate it.</p> <p>It needs to be clear that the current process is a proposal to amend the structure plan only. The structure plan is the guiding document that serves to coordinate development across multiple landholdings and highlight issues for addressing at subsequent subdivision and development stages of the development process.</p> <p>In this case, the concerns raised in this submission are largely development application issues which will be dealt with as part of a future application. This will be advertised for public comment.</p>
S7	REDACTED	<p>I am writing in response to the above stated Local Structure amendment plan regarding the development of Lot 366 Horsley Road.</p> <p>I am a long standing resident of REDACTED Denmark and consequently have a deep connection to, and investment in both the safety implications for some aspects of the proposed development and the natural environment.</p> <p>I applaud the plan as a dignified response to the aged population in Denmark however I would like make the following points:</p> <p>DRAINAGE:</p> <p>It appears that the drainage system for Amaroo Village and the subdivision will be leveraging off the Rockford Street drainage network. This system is at full capacity. It is critical that this point be considered and planned for to include the development of a drainage system to service Amaroo Village and subdivision that is separate to that already in existence for Rockford Street.</p> <p>The Shire engineer and Building Inspector Graham Blackmore are very aware that the drainage for Rockford Street is working at and over capacity with subsequent problems arising for residents in Rockford street and beyond.</p> <p>The residents of Rockford street have always had to deal with this huge drainage problem. E.g.: Number 6 Rockford Street has had to insert two industrial sumps to deal with this deluge running into her property.</p> <p>ROAD ONE:</p> <p>We oppose Road One.</p> <p>The proposed Road One which is planned for those turning left approximately 5-6 houses from the corner of Horsley Road and Rockford Street has several dangerous aspects to be considered. Cars often speed up Horsley Road and regularly cut the</p>	<p>Noted</p> <p>See submission S2, above.</p>

corner as they enter Rockford Street. This is a blind corner not easily sighted until you are upon the turn.

The possibilities for an accident increase exponentially with the planned Road One, for the residents of Rockford Street, it adds congestion and a significant increase in local traffic, associated noise, lack of privacy and drainage problems. Road One is on a slope heading downhill in Rockford Street, North South, which will be a huge concern with winter rains and winter deluge.

Given Amaroo Aged Care will be accessed from Horsley Road and the planned New North Road (in the new subdivision), the proposed Road One seems unnecessary. All the R 20 blocks are accessible from Rockford Street and 3 other Roads in the new subdivision. Rockford Street is a very small street, with no access to amenities. This seems excessive.

Another alternative suggestion would be to turn proposed Road One into a walk way enhancing opportunities for both the residents of Amaroo and the local to build relationships and community wellbeing through provision of socially inclusive settings.

ROAD TWO:

We oppose Road Two.

The proposed Road Two would also carve up Rockford Street making it extremely busy and congested with traffic. This road is not necessary for this new subdivision. There will be Roads and Streets accommodating all blocks in the new subdivision, with various other entry and exit points onto 4 major Roads leading to amenities.

Significantly these roads/streets and drainage systems will need to be maintained by the Denmark Shire and must be factored in as an ongoing expense. In today's climate why not make Road Two also walk way, giving people more walking space for health reasons as mentioned before.

7.5METRE BOUNDARY SETBACK FROM SHIRE VERGE:

As a blanket ruling for all people planning a build in the Denmark Shire, State Government Planning policy (Planning and Development Act 2005) rule that there needs to be a 7.5 metre set back from the Shire verge. We strongly advocate that this building code is respected by Amaroo Aged Care and Subdivision development.

LOCATION OF AREAS FOR AMAROO VILLAGE:

Given the frequent usage and thoroughfare of Horsley Road / Rockford Street intersection, it seems an unusual decision to locate the Dementia section of Amaroo Village within proximity to this corner. Best practice supporting people with dementia speaks to safe, predictable environments. A suggestion would be to centre the needs of these people and to locate their section to the rear of the village where there is less traffic hazards and more serenity.

TREES:

The large KARRI and MARRI trees on Rockford Street and Horsley Road soak up huge amounts of ground water in autumn and winter. This should be taken into consideration. These large trees on Horsley and Rockford are corridors for wildlife and have become a refuge for many endangered species over time. It is well known by locals that these trees cool the area in summer and have become a refuge and food supply for: Tawny Frogmouths, Boobooks, endangered Carnaby Cockatoos, Cuckoo Shrike, Martin Swallows, Possums, Bats, Phascogales to name a few. Last but not least The Rockford Street children play in these trees whenever they get the chance.

Many of these trees exceed 100 years in age and it seems counter to the environmental conscience of Denmark.

MORETON BAY FIG TREE:

The Moreton Bay Fig Tree also over 100 years and such an integral element of Denmark's environmental history.

Rather than remove the Moreton Bay Fig tree, it could be utilised as part of the aesthetic landscape like the approach used in the Fig Tree Plaza. A centrepiece of great beauty and shade for residents, staff and visitors of Amaroo, a place to gather and connect with each other.

This majestic tree is a marvel to look at, not a fire hazard and like the Karri and Marri a habitat for many of the south coasts native animals and birds.

I hope that these comments highlight some alternative possibilities to potential safety risks and environmental losses.

PROPOSED RETAINING WALL FOR AMAROO VILLAGE

- 4) These walls are used to retain fill and serve no purpose other than to build the site up. It will also impact our street scape. There will be no inlet views to be gained by this, only roof and tree tops.

IMPACT OF WALL

- 5) The walls and fill will also impact on the health of the 100-year-old trees on the verge by damaging the roots zones and create drainage problems.

LAY OF THE LAND

The Amaroo Village Development would need a flat site to accommodate all buildings. A much easier solution to this problem, would be to lower the high point of the site. This would give Amaroo a flat site that they require without dominating the Horsley Road and Rockford Street scape and create less drainage problems. No effort has been made in Amaroos submission to accommodate the natural slope of the land.

In the hazard & BAL assessment prepared, identified hazards can be managed, specifically on Rockford Road, hazards will be reduced as a result of service provision within the road reserve and the retention of the individual identified

		<p>significant trees.</p> <p>The proposed new location of Road One (east of the Amaroo Village, parallel to Horsley) would require the removal of these significant trees, We oppose this.</p>	
S8	REDACTED	<p>I am writing to voice my comments about the above proposal to develop the land REDACTED home.</p> <p>My main feeling is that this development will be positive for our community especially for the aged population however I feel I do need to make my opinions known.</p> <p>I appreciate the opportunity to share my views.</p> <p>I share the concerns of my neighbours regarding the drainage issues and addition of roadways coming from Rockford street into the proposed complex.</p> <p>The drainage of rainwater after heavy downpours is already a significant issue and should the development be relying on existing infrastructure we can expect our systems to be overwhelmed. I am hopeful the development will require Amaroo to make allowances for all of their own run off and re direct it to less stressed systems.</p> <p>The addition of Road 2 would directly impact my family making the nearby area busier and more noisy with vehicles. I am hopeful that they may consider a single entry and exit location with smaller roadways allowing access to all residences in the complex using internal road systems such is the case in most aged care complexes I am aware of.</p>	<p>Noted</p> <p>See submission S2, above.</p>
S9	REDACTED	<p><u>Property affected : REDACTED</u></p> <p><u>Regarding property affected</u></p> <p>I have owned REDACTED, the front house, for 25 years and lived there in for 23 years.</p> <p>As a deaf person the view from my living room across the paddock and on to REDACTED has been my sustenance and I am very grateful to have had it.</p> <p>The proposed development will block my views entirely and that, naturally, hurts my heart. I am glad though that what takes away from me will give help to many in need of care.</p> <p><u>Regarding proposed changes to road realignment and lot arrangement.</u></p> <p>My property will be affected by the proposed road being the REDACTED on Rockford Street from Horsley Road.</p> <p>According to the Option 2 plan this will be directly opposite REDACTED.</p> <p>Its construction would necessitate the removal of the very large tree REDACTED way and possibly increase water run off onto my driveway. That is my only comment.</p> <p><u>Regarding the proposed development site.</u></p> <p>A shire staff member, Ruth, told me that those affected are requested only to comment on the modified road layout. However, she advised me to note any particular point of concern.</p> <p>Thus, I note on the Bushfire Assessment Plan that a two-tier retaining wall on the</p>	<p>Noted</p> <p>See submission S2, above.</p>

		<p>eastern boundary is proposed.</p> <p>I have heard that the tiers will be 1.5m and 2.5m in height. This concerns me greatly. I feel that, with a pad height of 58.5m AHD, I and my neighbours (and future R20 owners of the rest of Amaroo land in lot 366) will be towered over by the whole complex.</p> <p>The Denmark Hospital has entry and exit approaches on slopes down and up. I would ask that Amaroo lowers, not raises, the overall height of the site.</p> <p>I hope to have further opportunity to submit my views in the next stages of the proposal.</p>	
S10	REDACTED	<p>I am writing in response to the above stated Local Structure amendment plan regarding the development of Lot 366 Horsley Road.</p> <p>I am a long standing resident of Rockford street Denmark and consequently have a deep connection to, and investment in both the safety implications for some aspects of the proposed development and the natural environment.</p> <p>I applaud the plan as a dignified response to the aged population in Denmark however I would like make the following points:</p> <p>DRAINAGE:</p> <p>It appears that the drainage system for Amaroo Village and the subdivision will be leveraging off the Rockford Street drainage network. This system is at full capacity. It is critical that this point be considered and planned for to include the development of a drainage system to service Amaroo Village and subdivision that is separate to that already in existence for Rockford Street.</p> <p>The Shire engineer and Building Inspector Graham Blackmore are very aware that the drainage for Rockford Street is working at and over capacity with subsequent problems arising for residents in Rockford street and beyond.</p> <p>The residents of Rockford street have always had to deal with this huge drainage problem. E.g.: Number 6 Rockford Street has had to insert two industrial sumps to deal with this deluge running into her property.</p> <p>ROAD ONE:</p> <p>We oppose Road One.</p> <p>The proposed Road One which is planned for those turning left approximately 5-6 houses from the corner of Horsley Road and Rockford Street has several dangerous aspects to be considered. Cars often speed up Horsley Road and regularly cut the corner as they enter Rockford Street. This is a blind corner not easily sighted until you are upon the turn.</p> <p>The possibilities for an accident increase exponentially with the planned Road One, for the residents of Rockford Street, it adds congestion and a significant increase in local traffic, associated noise, lack of privacy and drainage problems. Road One is on</p>	<p>Noted</p> <p>See submission S2, above.</p>

a slope heading downhill in Rockford Street, North South, which will be a huge concern with winter rains and winter deluge.

Given Amaroo Aged Care will be accessed from Horsley Road and the planned New North Road (in the new subdivision), the proposed Road One seems unnecessary. All the R 20 blocks are accessible from Rockford Street and 3 other Roads in the new subdivision. Rockford Street is a very small street, with no access to amenities. This seems excessive.

Another alternative suggestion would be to turn proposed Road One into a walk way enhancing opportunities for both the residents of Amaroo and the local to build relationships and community wellbeing through provision of socially inclusive settings.

ROAD TWO:

We oppose Road Two.

The proposed Road Two would also carve up Rockford Street making it extremely busy and congested with traffic. This road is not necessary for this new subdivision. There will be Roads and Streets accommodating all blocks in the new subdivision, with various other entry and exit points onto 4 major Roads leading to amenities.

Significantly these roads/streets and drainage systems will need to be maintained by the Denmark Shire and must be factored in as an ongoing expense. In today's climate why not make Road Two also walk way, giving people more walking space for health reasons as mentioned before.

7.5METRE BOUNDARY SETBACK FROM SHIRE VERGE:

As a blanket ruling for all people planning a build in the Denmark Shire, State Government Planning policy (Planning and Development Act 2005) rule that there needs to be a 7.5 metre set back from the Shire verge. We strongly advocate that this building code is respected by Amaroo Aged Care and Subdivision development.

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Given the frequent usage and thoroughfare of Horsley Road / Rockford Street intersection, it seems an unusual decision to locate the Dementia section of Amaroo Village within proximity to this corner. Best practice supporting people with dementia speaks to safe, predictable environments. A suggestion would be to centre the needs of these people and to locate their section to the rear of the village where there is less traffic hazards and more serenity.

TREES:

The large KARRI and MARRI trees on Rockford Street and Horsley Road soak up huge amounts of ground water in autumn and winter. This should be taken into consideration. These large trees on Horsley and Rockford are corridors for wildlife and have become a refuge for many endangered species over time. It is well known by locals that these trees cool the area in summer and have become a refuge and

		<p>food supply for: Tawny Frogmouths, Boobooks, endangered Carnaby Cockatoos, Cuckoo Shrike, Martin Swallows, Possums, Bats, Phascogales to name a few. Last but not least The Rockford Street children plan in these trees whenever they get the chance.</p> <p>Many of these trees exceed 100 years in age and it seems counter to the environmental conscience of Denmark.</p> <p>MORETON BAY FIG TREE: The Moreton Bay Fig Tree also over 100 years and such an integral element of Denmark's environmental history.</p> <p>Rather than remove the Moreton Bay Fig tree, it could be utilised as part of the aesthetic landscape like the approach used in the Fig Tree Plaza. A centrepiece of great beauty and shade for residents, staff and visitors of Amaroo, a place to gather and connect with each other.</p> <p>This majestic tree is a marvel to look at, not a fire hazard and like the Karri and Marri a habitat for many of the south coasts native animals and birds.</p> <p>I hope that these comments highlight some alternative possibilities to potential safety risks and environmental losses.</p> <p>PROPOSED RETAINING WALL FOR AMAROO VILLAGE</p> <p>6) These walls are used to retain fill and serve no purpose other than to build the site up. It will also impact our street scape. There will be no inlet views to be gained by this, only roof and tree tops.</p> <p>IMPACT OF WALL</p> <p>7) The walls and fill will also impact on the health of the 100-year-old trees on the verge by damaging the roots zones and create drainage problems.</p> <p>LAY OF THE LAND The Amaroo Village Development would need a flat site to accommodate all buildings. A much easier solution to this problem, would be to lower the high point of the site. This would give Amaroo a flat site that they require without dominating the Horsley Road and Rockford Street scape and create less drainage problems. No effort has been made in Amaroos submission to accommodate the natural slope of the land.</p>	
S11	REDACTED	<p>I object to the removal of the majority of the trees that currently line Rockford Street referred to in the Bushfire Safety assessment of the amended structure plan for the proposed aged care facility.</p> <p>“Rockford Street hazards will be reduced as a result of service provision within the road reserve and the retention of the individual identified trees.”</p> <p>From closer examination of the map it appears only six trees have been identified as</p>	<p>Noted</p> <p><u>Trees</u></p> <p>As noted by the applicant, it is not the intention to remove street trees. Previously considered subdivision applications over Lot 366 highlighted the need to retain the roadside vegetation. An</p>

		<p>significant. Given that the entire Rockford Street road reserve is bordered by open paddocks and existing houses, I question the need to remove so many trees.</p> <p>The many mature Marri and Karri trees that line the northern road reserve of Rockford Street are:</p> <ul style="list-style-type: none"> • an important part of the streetscape • provide habitat for wildlife • are used as a recreational space by neighbourhood kids who spend their afternoons and weekends building cubbies amongst the tree trunks and climbing in the branches <p>I am concerned that only individual identified significant trees will be retained. The mature Marri trees on Rockford Street are an important feeding habitat for critically endangered Baudin's and Carnaby's black cockatoos, which spend several months each year roosting and feeding in the trees. Their calls as they return each summer to feed on the Marri nuts are part of the fabric of Rockford Street, as are the gumnuts dropped over the road and verge.</p> <p>The trees provide an important wildlife corridor. They give shade and shelter to kangaroos, walkers, neighbourhood kids and the many families who stop beneath the trees opposite our house to pat the horses that shelter beneath the low hanging branches. Tourists regularly pull up outside our house to do the same.</p> <p>The kids of Rockford Street and their friends from the surrounding neighbourhood have an elaborate network of cubbies and forts built beneath, in and around the trees stretching from the massive old fig tree in the paddock at the top of the street, through the Marris down to the Karris at the bottom of the street. They have planted a flag in the stump of the old tree halfway down the street that was hit by lightning eight years ago, claiming it for the "Tribes of Rockford." Watching them play together is a great joy.</p> <p>Clearing these trees for the sake of a dual use path that will cover their play space with concrete seems terribly misguided at a time when parents everywhere are battling to keep their kids away from screens.</p> <p>While I have reservations over the scale and intensity of the proposed development, above all other considerations I implore you to reconsider the clearing of these trees. It will be doing a disservice not only to the current residents of Rockford Street but the future residents of the aged care facility and the smaller lots proposed for the remainder of the subdivision.</p>	<p>arborists report was undertaken at the time and some diseased and dying trees were permitted for removal but good quality vegetation was to be retained.</p> <p>The Bushfire Management Plan appended to the amended structure plan states "Hazards reduced in road reserve via service provision. Identified significant trees to be retained."</p> <p>This vegetation is not required to be removed for servicing or access to the site. The large trees in the road reserve would not trigger a higher 'Bushfire Attack Level' (BAL) consideration if coupled with substantial low and mid-storey vegetation.</p> <p>As noted at submission 2: It is recommended that the amended Structure Plan be annotated with a statement "vegetation in the road reserve to be preserved wherever possible".</p> <p>It should be noted that there is always a caveat with this statement that weeds, diseased or dying trees may be removed.</p> <p>It is acknowledged that the Moreton Bay Fig tree near the southwestern corner of Lot 366 is a large, old tree and offers amenity and has some historical significance. However, the tree does not appear on any significant tree list (previously included in the Municipal Heritage Inventory) is non-native and located well within private property.</p> <p>It is recommended that annotation be placed on the amended structure plan <u>encouraging</u> retention of the tree only.</p>
G1	Dept of Biodiversity, Conservation & Attractions	Thank you for your letter regarding the above amended structure plan for Lot 366 Horsley Road Denmark.	Noted

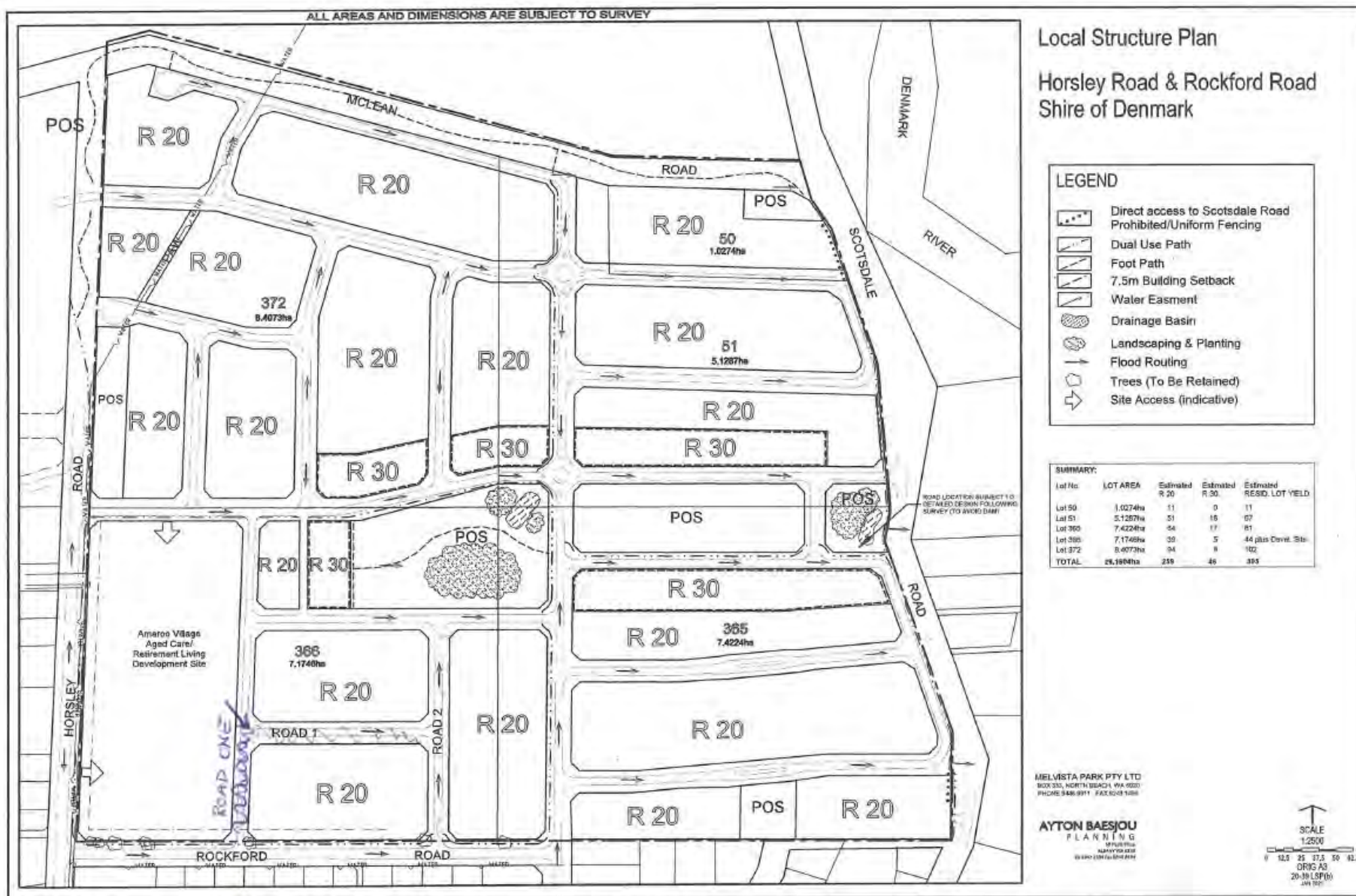
	REDACTED	Parks and Wildlife has no further comments or objections to this proposal.	
G2	Water Corporation REDACTED	The Corporation advises the Shire that it has no objection to the changes proposed as provision for water related services have been addressed in previous structure plans / subdivisions.	Noted
G3	Dept Primary Industries & Regional Development REDACTED	Thank you for requesting advice from the Department of Primary Industries and Regional Development (DPIRD) on the proposed Local Structure Plan Amendment to make provision for the Amaroo Village Aged Care / Retirement Living development on Lot 366 Horsley Road Denmark. While DPIRD has no objection to the proposal, the following comments are provided for your consideration: The location and surrounding landscape has been identified as Priority Agricultural Land (PAL) under the Lower Great Southern Region Plan. Surrounding land use comprises a mix of residential and rural land. It is anticipated that sufficient buffers and separation distances will be applied to minimise any potential for land use conflict with adjacent rural enterprises.	Noted Lot 366 is a considerable distance from the nearest land uses for farming.
G4	Dept of Health REDACTED	The development is required to connect to scheme water and reticulated sewerage and be in accordance with the Government Sewerage Policy 2019. The subject land is in a region that may occasionally experience problems with nuisance and disease carrying mosquitoes such as <i>Culex annulirostris</i> and <i>Aedes camptorhynchus</i> breeding in natural waterbodies or man-made infrastructure within proximity to the subject land. These mosquitoes can disperse several kilometres from breeding sites associated with the Wilson Inlet and Denmark River and are known carriers of Ross River (RRV) and Barmah Forest (BFV) viruses. As the risk of exposure to these diseases for future residents/workers/visitors is unknown it is recommended the Shire of Denmark determine the likelihood and the extent of this risk. If the risk from mosquitoes and mosquito-borne disease is considered medium or high, a mosquito management plan will be beneficial to protect the health and wellbeing of future residents and visitors to the area. Details for mosquito management may be downloaded from: http://ww2.health.wa.gov.au/Articles/JM/Mosquito-management .	Noted.
G5	Dept Fire & Emergency Services advice@dfes.wa.gov.au	This advice relates only to <i>State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7)</i> and the <i>Guidelines for Planning in Bushfire Prone Areas (Guidelines)</i> . I	Noted The assessment branch of DFES do not have the ability to visit a site and verify proposals on a case-by-case basis. The Shire has conducted a site visit using a level 1 accredited bushfire

	<p>Summarised.</p>	<p><u>Assessment</u></p> <p>Vegetation classification Vegetation plots 5 and 6 cannot be substantiated as Class B Woodland with the limited information and photographic evidence available. The crown canopy cover appears to exceed 30%. Photo ID's 12 – 16 do not support the Woodland classification.</p> <p>The BMP should detail specifically how the Class B Woodland classification was derived as opposed to Class A Forest. If unsubstantiated, the vegetation classification should be revised as per AS3959:2018 or the resultant BAL ratings may be inaccurate.</p> <p>BAL Contour Map There are a number of lots identified on the BAL Contour Map as BAL-FZ (including the lot where the aged care facility is proposed).</p> <p>Table 2 discusses the setbacks required to achieve BAL-29. This is not accepted by DFES. The vegetation causing the BAL40/FZ within the structure plan area is outside the lot boundary.</p> <p>The BAL rating of a lot is defined by the highest BAL rating applied through the BAL contouring. Table 2 should be removed as it is misleading. The policy required structure plans and subdivisions to achieve BAL-29 for the entire lot not for the potential future buildings. Lots with a BAL rating of BAL40/FZ should not be supported as per policy measures 6.7.</p> <p>Location and Siting and Design The BMP recognises vegetation outside the lot boundary as a bushfire hazard, yet the future subdivision design has not responded to this risk. Good design, including provision of hazard separation such as a perimeter road or public open space, will ensure the subdivision meets the intent of these elements by ensuring lots are located in areas with the least possible risk and minimising bushfire risk.</p> <p>The Guidelines states that the strategic planning proposal should be located in an area of BAL-29 or below. The strategic planning stage provides opportunity to ensure that this can be achieved.</p> <p>The BMP does not adequately address the policy requirements of SPP 3.7 and</p>	<p>practitioner and the vegetation classifications identified in the Bushfire Hazard Assessment are generally supported.</p> <p>A portion of the proposed Aged Care Facility is within the BAL-Fz designation. However, a future development application can respond to this issue. To imply that the whole site is inappropriate for development is a blind application of policy and inappropriate. The risk in this case comes from unmanaged grassland and small areas of roadside vegetation and some sense of context should be considered.</p> <p>As the vegetation that gives rise to the bushfire threat is located within the adjacent road reserve, this can be modified and kept in a low fuel state through agreement with the Shire under the 'Activities on Thoroughfares Local Law.</p>
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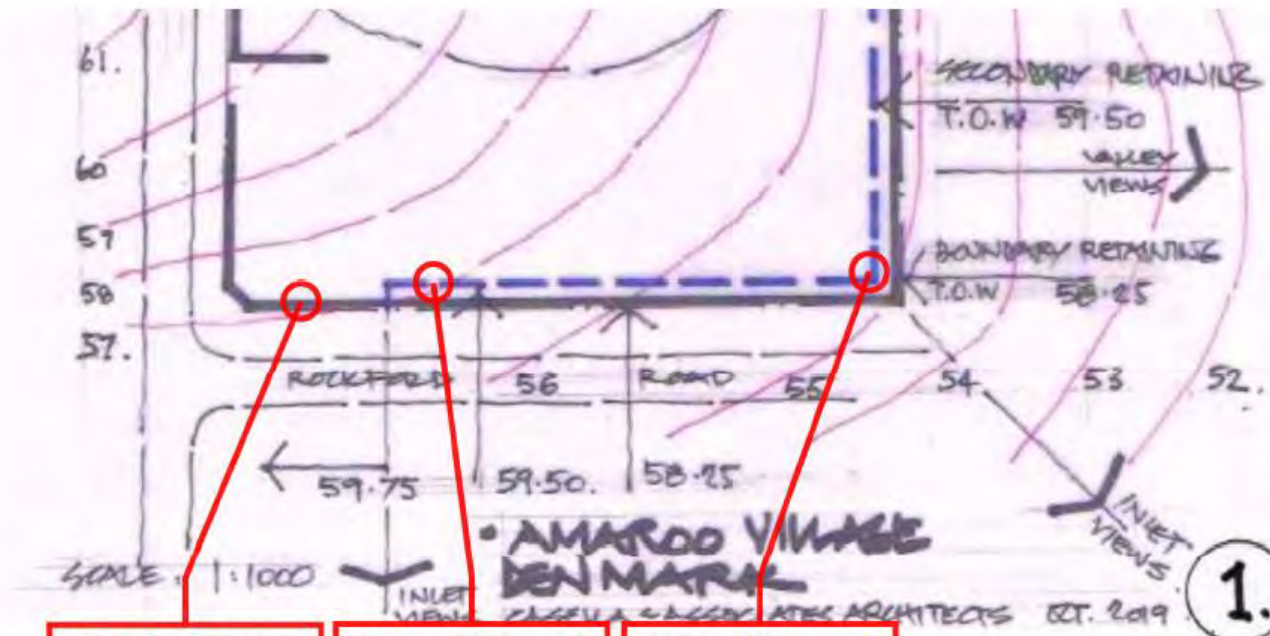
		<p>the Guidelines. DFES has assessed the Structure Plan and accompanying BMP. Several issues that need to be addressed prior to support of the proposal</p>	
G6	Dept of Water & Environmental Regulations <i>REDACTED</i>	The Department does not object to the proposal and has no comments.	Noted



Submission Attachment - S2



Submission Attachment S4



- 1.25m high wall above NGL
- 2.5m high wall above NGL
- 4.5m high wall above NGL

Figure 2: Concept plan for fill and retaining with Planning Solutions notations (extract from Bushfire reporting)

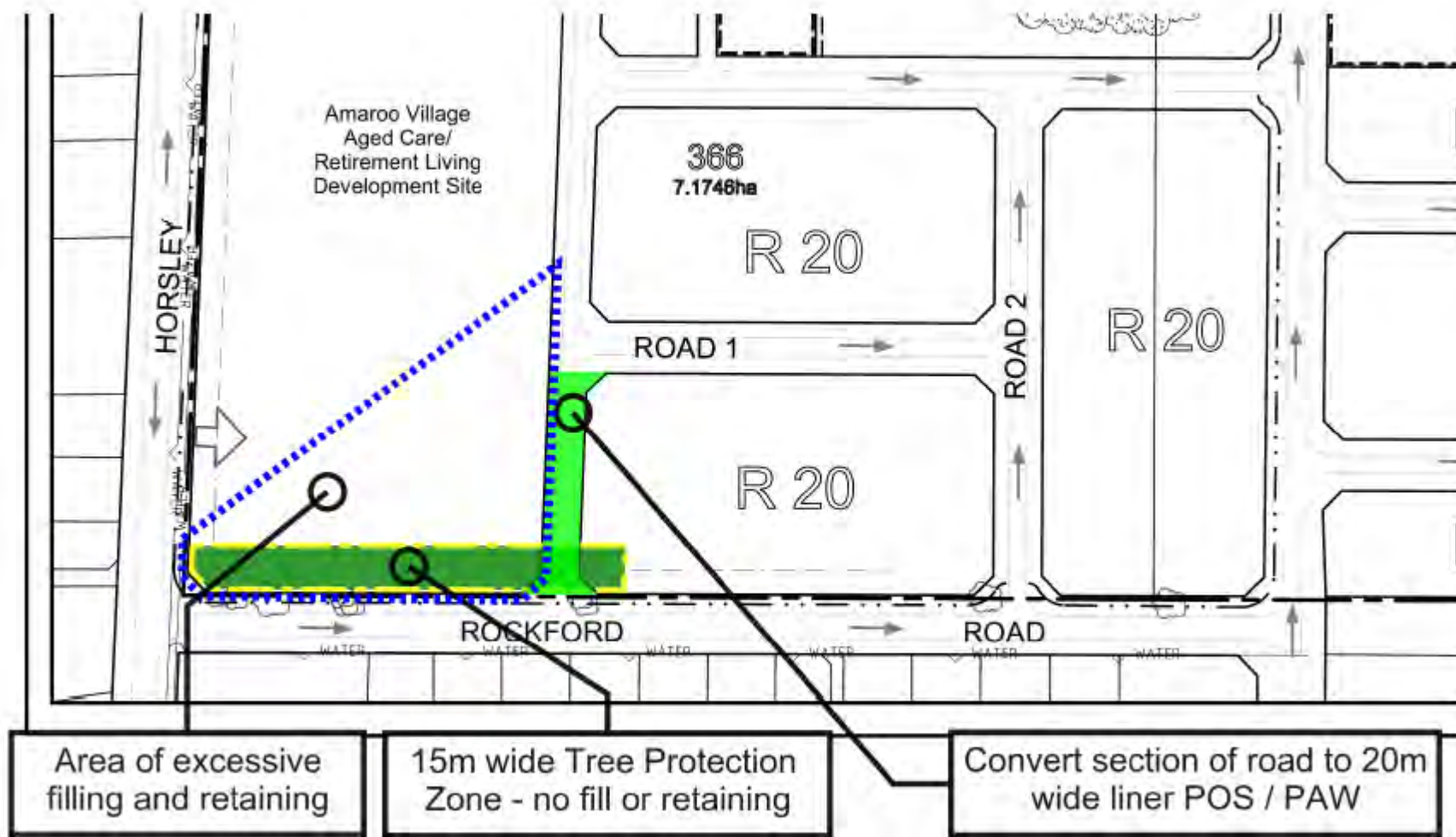


Figure 3: Overview of objections

ALL AREAS AND DIMENSIONS ARE SUBJECT TO SURVEY

Local Structure Plan

Horsley Road & Rockford Road Shire of Denmark

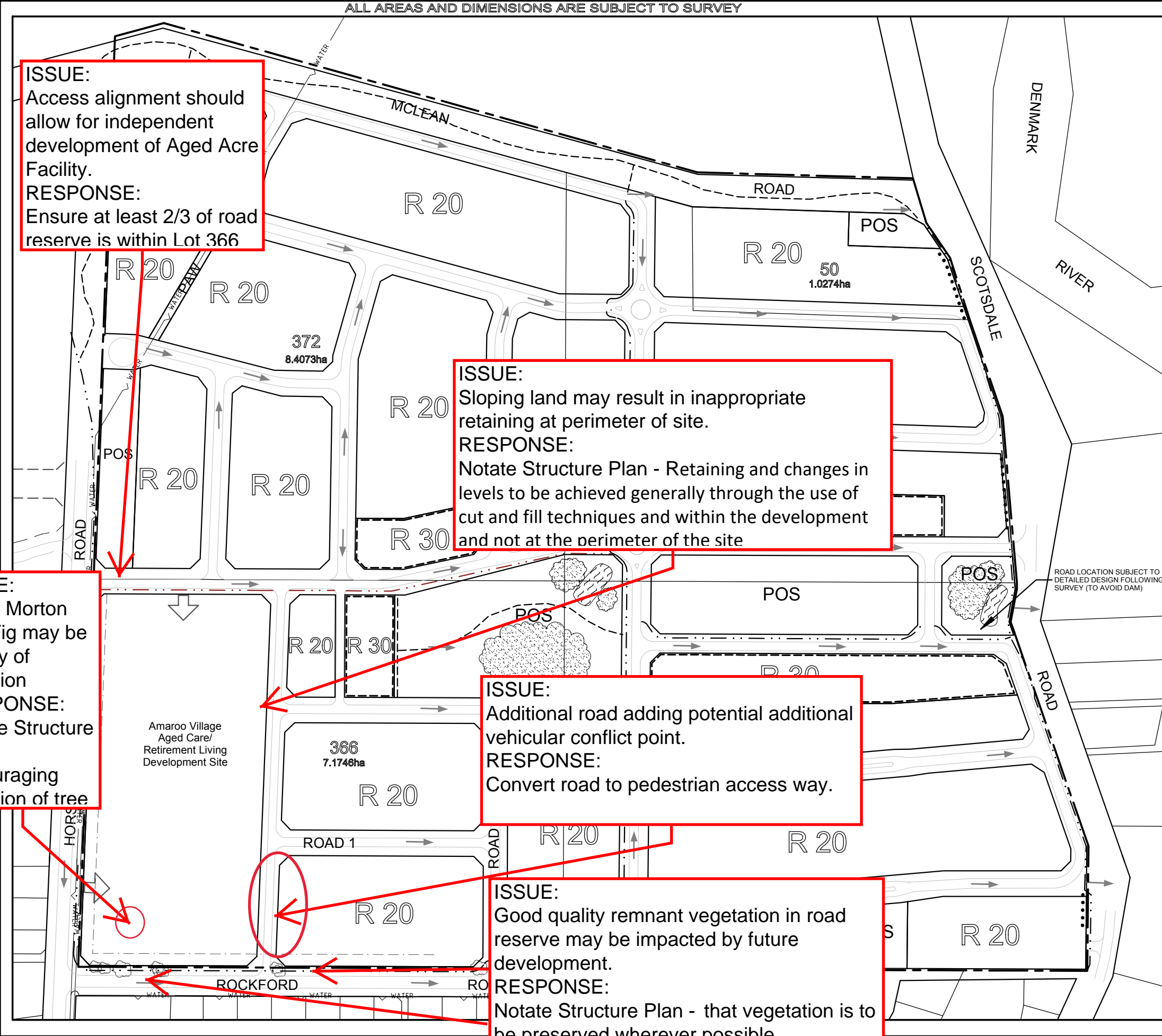
ISSUE:
Access alignment should allow for independent development of Aged Acre Facility.
RESPONSE:
Ensure at least 2/3 of road reserve is within Lot 366

ISSUE:
Sloping land may result in inappropriate retaining at perimeter of site.
RESPONSE:
Notate Structure Plan - Retaining and changes in levels to be achieved generally through the use of cut and fill techniques and within the development and not at the perimeter of the site

ISSUE:
Large Morton Bay Fig may be worthy of retention
RESPONSE:
Notate Structure Plan encouraging retention of tree

ISSUE:
Additional road adding potential additional vehicular conflict point.
RESPONSE:
Convert road to pedestrian access way.

ISSUE:
Good quality remnant vegetation in road reserve may be impacted by future development.
RESPONSE:
Notate Structure Plan - that vegetation is to be preserved wherever possible.



LEGEND

- Direct access to Scotsdale Road Prohibited/Uniform Fencing
- Dual Use Path
- Foot Path
- 7.5m Building Setback
- Water Easement
- Drainage Basin
- Landscaping & Planting
- Flood Routing
- Trees (To Be Retained)
- Site Access (indicative)

SUMMARY:

Lot No.	LOT AREA	Estimated R 20	Estimated R 30	Estimated RESID. LOT YIELD
Lot 50	1.0274ha	11	0	11
Lot 51	5.1287ha	51	16	67
Lot 365	7.4224ha	64	17	81
Lot 366	7.1746ha	39	5	44 plus Devel. Site
Lot 372	8.4073ha	94	8	102
TOTAL	29.1604ha	259	46	305

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