



SHIRE OF DENMARK

TOWN PLANNING SCHEME POLICY

PUBLIC OPEN SPACE

1. INTRODUCTION

Under the Planning and Development Act 2005 (Act), contributions for public open space (POS) are required where a subdivision seeks to create more than 2 lots. The Act also provides for land being set aside at subdivision stage for various purposes, amongst others and relevant to this policy, land for conservation and protection of the environment; reserve for drainage, foreshore management, waterway management, recreation and public purposes. West Australian Planning Commission (WAPC) Development Control Policy 2.3 –Public Open Space in Residential Areas requires 10% of the gross subdivisible area of a conditional subdivision be given up free of cost by the subdivider for public open space (POS) where a subdivision seeks to create more than five lots.

The introduction of *'Liveable Neighbourhoods'* and *'Better Urban Water Management'* by the WAPC provides additional guidelines to achieve well located and good quality open space which integrates environmental values and provide for both active and passive recreation needs of the communities.

This policy has been developed to provide criteria against which Council will assess the quality, size, type and distribution of POS proposed at Structure Plan and subdivisions stages.

2. POLICY BASIS

Clause 8.2 of the Shire of Denmark's Town Planning Scheme No. 3 ('the Scheme') provides for the preparation of Local Planning Policies. This Policy has been prepared in accordance with the Scheme.

This Policy does not bind the local government in respect of any application for development approval but the local government will have due regard to the provision of the Policy and the objectives which the Policy is designed to achieve before making its determination.

3. SCHEME REQUIREMENTS

Clause 5.3.5 of the Scheme provides that in areas with dual or split coding, development standards of the lower density code applies. Council may permit development at the higher density code where the development is connected to reticulated sewerage system, it is at a high standard of design and aesthetics and is consistent with an adopted Structure Plan for areas consisting of large or several landholdings.

This policy provides matters that require consideration in the preparation of Structure Plans pertaining to POS.

4. OBJECTIVES

The objectives of the policy are:

- To ensure all residential development is complemented by good quality, well located areas of public open space that enhance the amenity of the development and provide for the recreational needs of the residents.
- To ensure public open space provided for under the Act contributes predominantly towards the active and passive recreational needs of the community.
- To ensure that the design, size and dimensions of POS results in practicable and useable spaces for passive and active recreational needs.
- To provide public opens space that is safe and overlooked by nearby buildings.
- Accommodate water-sensitive urban design in public parkland areas where usability for recreation purposes are not compromised or where conservation values are enhanced.
- Provide criteria under which cash-in-lieu of public open space will be accepted and required.

5. APPLICATION OF THE POLICY

This policy applies to land **that is to be** vested in the Shire of Denmark contributed free of cost by the **developer** through the subdivision process within areas zoned Residential. **It** applies to all green-title and survey strata subdivision applications where more than five lots are being created and in accordance with WAPC policy, except where the provisions of this policy otherwise specify.

6. DEFINITIONS

Conservation Reserve: Conservation reserves are areas of high conservation value within the natural landscape, including native vegetation with habitat value for fauna and flora and may include significant landscape features, sites of historical and cultural significance and provide for important linkages between reserves.

Conservation/Recreational Reserve: Conservation/recreational reserves provide for the conservation of ecological, historical and landscape values whilst also providing for recreational activities with low impact on the environment.

District Park: A District Parks is ideally located within a radius of 1 - 4km of residential lots and approximately 2.5 – 7ha in area and may include areas of conservation/recreation, playing fields and community facilities such as toilets etc. Facilities offered within district parks are likely attract communities within the Denmark townsite and beyond. The recreations centre on Brazier Street and tennis and golf clubs on South Coast Highway, trotting track, Berridge Park and Kwoorabup Park are within this category.

Neighbourhood Park: A Neighbourhood Park is ideally located within 400m of residential lots and is approximately 3,000-5,000m² in area. Neighbourhood Parks may contain playground facilities, seating, landscaping, gazebo, barbeque facilities and formal walk paths.

Local Park: A Local Park is ideally located within 150 – 300m walking distance from residential lots and is approximately 3,000m² in area. Local Parks may contain playgrounds, seating and provide for a resting place for the elderly.

Active Open Space: Active open space provides opportunity for active play such as formal playing fields, walk paths and playgrounds with high aesthetic landscape values. District, Neighbourhood and Local Parks may typically fall within this definition.

Passive Open Space: Passive open space provides passive recreational opportunity such as seating/picnic areas and designated but undeveloped walk paths. Conservation/Recreational Reserves and District Parks may typically fall within this definition.

Areas of Conservation Value: Areas of conservation value includes, but are not limited to the following (refer to 7.2.1):

- Foreshore reserves where the subdivision includes land abutting the coast or water body (eg. and inlet) or a watercourse (eg river or creek) **and its associated riparian zones**. Foreshore widths are to be determined in accordance with SPP 2.6 – Coastal Planning Policy and SPP 2.9 – Water Resources.
- An Environmental Protection Policy wetland, conservation category wetland or wetland of a similar environmental value. **The boundary and extent of a wetland and its buffer are to be determined on a case by case basis using biophysical assessments to the satisfaction of Department of Water. The requirements of SPP 2.6 – Coastal Planning Policy and SPP 2.9 – Water Resources should also be considered.**
- An area of remnant vegetation of high conservation value.

7. POLICY STATEMENT

7.1 Assessment of Site Characteristics

7.1.1 The planning of POS within a neighbourhood requires a good understanding of the characteristics of the subject land. In order to provide for well located areas of open space Council require, at Structure Plan stage, that a detailed assessment of the site characteristic be undertaken in order to determine the nature, distribution and function of open space areas. The assessment will investigate matter such as:

- Provision of conservation areas and POS within surrounding neighbourhoods which may influence the open space planning within the subject land;

- Site conditions such as topography, contours, landscape features, natural drainage lines and the conservation quality of areas of vegetation.
- European and Indigenous heritage values present.

7.1.2 The assessment of site characteristic shall be done at District Structure Plan, Local Structure Plan and subdivision stages as per Appendix 1.

7.2 Areas of Conservation Value

7.2.1 The identification of areas of conservation value should consider the following matters:

- Areas of remnant vegetation are important refuges for flora and fauna populations. Vegetation corridors and stepping stone mosaic provide valuable resources in terms of habitat, food source and faunal movement and floral dispersal opportunities.
- Larger areas of remnant vegetation which minimise boundary to area ratios are generally of higher environmental value as they reduce edge effects.
- Riparian zones, wetlands and water courses are of high conservation value and in some instances linear remnants are a preferable alternative, particularly if creating a corridor between other bushland areas.
- Areas of granitic outcrops are typically of high conservation value in the plant and animal assemblages they support and a high level of endemism.
- Location within the landscape ecology – connectedness to other remnants or bushland areas, hydrological considerations in regards position within the landscape
- Occurrence of vegetation in good to excellent condition.
- The representativeness of the vegetation landscape complex that the area is comprised of. If under-represented (at less than 15- 30%) across the landscape then it would be deemed to have higher conservation value
- Biodiversity values present:
 - ESA's – environmentally sensitive areas
 - TEC's – threatened ecological communities
 - Threatened flora
 - Threatened fauna

7.2.2 Areas identified of conservation value will not be included in the gross subdivisible area on which the POS requirement is assessed and will be in addition to the land required for POS.

7.2.3 In accordance with '*Liveable Neighbourhoods*' Council may support the inclusion of areas of conservation value within the 10% POS contribution where it can support passive recreational needs of the community and only where the active recreational needs of the community has been met.

7.2.4 The identification of areas of conservation value shall be done at District Structure Plan, Local Structure Plan and subdivision stages as per Appendix 1.

7.3 Rate of Provision and Distribution

The provision of POS based on the gross subdivisible area shall be determined as follows:

- 7.3.1 A Structure Plan or subdivision shall be supported with a POS schedule (as per R31 of Liveable Neighbourhoods) which list the total site area, the gross subdivisible area, the 10% POS contribution listing the areas of local, neighbourhood and district parks and their functions (active or passive) and the restricted use public open space allocation (e.g. conservation/recreational areas). The POS schedule shall be done at District Structure Plan, Local Structure Plan and subdivision stages as per Appendix 1.

Note: Gross subdivisional area includes house lots, access roads, and any land incidental to the subdivision. The gross subdivisible area does not include areas for schools, shopping centres, infrastructure (eg land required for sewer pump stations), dedicated drainage sites not having a recreation function and land set aside for arterial roads and other non-residential uses.

- 7.3.2 The provision of open space shall achieve a local park within 150 – 300m safe walking distance and a neighbourhood park within 400m safe walking distance of each residential house. The Structure Plan and/or subdivision shall show the catchment of each local, neighbourhood and district park via a 'ped-shed' analysis.
- 7.3.3 Linear open space shall be provided along valleys, rivers, creeks and regional flood paths to retain key landform and urban water management elements.
- 7.3.4 Subdivision applications shall show conservation reserves, conservation/recreation reserves, district, neighbourhood and local parks in the same dimension, size and location in accordance with an approved Structure Plan. Council shall not accept a reduction in the size and number of public open spaces unless further information to justify the change to public open space provision has become available.

7.4 Open Space Design Criteria

There are a number of criteria that should be considered in the design and location of POS areas as follows:

- 7.4.1 The Structure Plan and/or subdivision shall illustrate how POS allocation and distribution provides for a variety of open spaces to serve a range of different active and passive recreational needs of existing and future residents.
- 7.4.2 The design of subdivisions surrounding parks shall ensure that parkland is overlooked by nearby buildings. Perimeter streets will generally be required around open space. Where a street is not provided, it must be demonstrated that other means will be used to ensure overlooking and surveillance from adjoining buildings.

7.4.3 POS design shall **take into consideration natural environmental values**, contribute to place making and be located to build on the special attributes of an area for long-term public amenity and sense of place.

7.4.4 Maximum acceptable grade shall be in accordance to the Shire's '*Guidelines for Development and Subdivision*' of land as follows:

Area	Finished Treatment	Use	Grade
Existing (Non-earthworked)	Partial clearing, natural vegetation and drought resistant grass. Non reticulated.	Passive	Natural Surface
Batter (Earthworked)	Native trees and shrubs and drought resistant grass. Non reticulated	Passive	Maximum 1:3
Batter (Earthworked)	Grassed and reticulated	Active & Passive	Standard 1:6 Maximum 1:4 (only with Shire Approval)
Ovals & Pitches	Grassed and reticulated	Active & Passive	Maximum 1:100

7.4.5 The dimensions of POS shall have a minimum of 1:3 side to length ratio. Council will consider the land characteristics and proposed use of the POS in reaching an agreement on the dimensions thereof.

7.4.6 The minimum size acceptable for a public open space area shall be 3,000m².

7.4.7 In general, areas of public open space shall be of shape, dimension and size which will result in useable areas for either active or passive recreational use. Council will not accept areas not suitable for residential or road development (i.e. 'left over land') as POS.

7.4.8 Where infrastructure such as telecommunication towers, transformers etc. are to be placed within areas of public open space, the area shall not be calculated as part of the 10% POS provision and shall be suitably screened from residential and POS areas.

7.5 Urban Water Management and POS

7.5.1 In accordance with '*Liveable Neighbourhoods*' principles, urban water management measures may be located within POS where it does not compromise the principle function thereof.

7.5.2 There is a general presumption against the placement of drainage sumps in POS. Council will support the detention of stormwater through the use of swales and depressions or other suitable measures which contributes to the amenity value and aesthetics of the POS and shall be designed and located to maximise the use thereof during low rainfall periods.

- 7.5.3 There is a general presumption against the placement of perched lakes in POS due to ongoing maintenance issues and cost **and environmental issues such as algal blooms.**

7.6 Minimum Standards for Development

- 7.6.1 All public open space areas shall be developed to minimum standard of development which may include, but is not limited to carparking, full earthworks, basic reticulation (if required), grassing and pathways that form part of the overall pedestrian and/or cycle network and maintenance for two years. Note: A bond for maintenance will be required.

- 7.6.2 Council shall require that a landscape plan be prepared as a condition of subdivision (refer Appendix 1). The landscape plan shall indicate the design objectives and show areas of soft and hard landscaping, carparking, pathways, urban water management features, fencing, playground, seating etc.

- 7.6.3 Where relevant, Council shall require developers to provide a whole of life cost estimates and indicative maintenance schedules and costs of POS.**

7.7 Community Purpose Sites

- 7.7.1 Council may accept site(s) for community purpose being included in the 10% POS contribution where a need for a specific community facility has been identified in an approved Structure Plan.

- 7.7.2 Community purpose sites should preferably be located in neighbourhood centres or adjacent to POS to assist in forming community focus. Area of community purpose site should not be less than 2000m² and shall be identified in a Structure Plan.

7.8 Cash-in-lieu of Public Open Space

Council will accept cash-in-lieu of open space contribution in accordance with **s. 153 of the Planning and Development Act 2005 and section 3.1.5 and 3.1.6 of WAPC's Development Control Policy 2.3 – Public Open Space in Residential Areas** and under the following circumstances:

- 7.8.1 In areas **zoned Residential with dual or split coding** where small subdivisions of between 3-5 lots may occur and the provision of POS will result in a small unusable area of land being set aside, Council will raise a cash-in-lieu contribution.

- ~~7.8.2 The contribution amount shall be calculated in accordance with the requirements of the Act. The contribution amount shall be based on the following sliding scale, linked to the maximum lot yield:~~

Number of lots created	POS contribution against the value of the gross subdividable land
3	5%
4	7.5%
5	10%

7.8.2 The contribution amount shall be calculated at 10% of the gross subdivisional area. In order to establish a nexus between the development and its planning impact for the demand for POS, a credit will be given for each existing lot that forms part of a subdivision between 3 and 5 lots and will be calculated as a proportion of the maximum subdivision yield under the proposed tenure and relevant density code. For example, where one lot is subdivided into 4 lots, a credit is provided for the existing lot resulting in the cash-in-lieu contribution being 3/4ths of the 10%.

7.8.3 Cash-in-lieu of POS shall also be considered by Council where more than 5 lots are being created in a subdivision where the area of land to be dedicated for POS is not of practicable use (size, slope etc.), or where there is already adequate POS in the locality.

~~7.8.3 Where it can be demonstrated that a higher yield can be obtained from the parent lot the POS contribution shall be based on the maximum subdivisional yield made payable upon the initial subdivision.~~

8. OTHER RELEVANT DOCUMENTATION

This policy should be read in conjunction with the follow documents:

- Council's *"Guidelines for Development and Subdivision of Land"*.
- *Liveable Neighbourhoods* – A Western Australian Government sustainable cities initiative
- *Better Urban Water Management* (October 2008) – Department of Water
- WAPC Policy No. DC 2.3 – Public Open Space in Residential Areas

Shire of Denmark
Town Planning Scheme Policy – Public Open Space

	District Structure Plan (generally > 300ha) 1:5000 – 1:10 000	Local Structure Plan (generally < 300ha) 1:2000 – 1:5000	Subdivision
Site Characteristic in relation to planning for POS	X	X	X
Areas of conservation value	X	X	X
POS size and distribution	X	X	X
POS schedule	X	X	X
Landscape plan			X
Water Management Strategy	X (District)	X (Local)	X (urban)
Drainage Facilities		X	X
Developmental Earthworks		X	X

Appendix 1: POS requirements at different levels of planning



Shire of Denmark ICR104725	
28 APR 2010 PLN.59	
DATE	LPH
FILE REF	
COUNCILLORS	
CEO	
DIR of FINANCE	
DIR of PLANNING	✓
DIR of INFRASTRUCTURE	
DIR of COMMUNITY	
OTHER	

Your ref: PLN59 SW/RH
Our ref: TPS/0174
Enquiries: Anthony Deutschmann

22 April 2010

Chief Executive Officer
PO Box 183
DENMARK WA 6333

Attention: Mr Sam Williams

Dear Sam

SUBMISSION - DRAFT TOWN PLANNING SCHEME POLICY PUBLIC OPEN SPACE

I refer to your letter dated 26 March 2010 seeking comment on the abovementioned matter.

This Office wishes to make the following comments in regards to the Draft Policy.

- i) Section 1 of the Policy should make reference to the principles and criteria outlined in Clauses 3.1.5 and 3.1.6 of the WAPC's *Development Control Policy 2.3 - Public Open Space in Residential Areas*.
- ii) In Section 1 it should be mentioned that the provision of public open space may not be required if the subdivider can demonstrate that the required 10% POS has been previously provided as part of the earlier subdivision of the original landholding.
- iii) An objective of Section 4 of the Policy should be that parkland design take into consideration natural environmental values and maintenance issues as well.
- iv) Section 5 of the Policy needs to be more clearly worded to explain in what circumstances the policy applies to the subdivision of land..
- v) Riparian zones and water courses may need to be included in the definition of 'Areas of Conservation Value' in Section 6 of the Policy
- vi) The various deductions for determining the gross subdividable area should be identified in Section 7.3.1 of the Policy.
- vii) Section 7.8 of the Policy should make reference to s. 153 of the *Planning and Development Act 2005*.
- viii) It is open to question whether Section 7.8.1 of the Policy should also apply to those areas zoned 'Residential' that have a single density code.

ix) The planning purpose behind the sliding scale for cash-in-lieu contributions in Section 7.8 of the Policy is not sound and WAPC's Policy requirements for a cash-in-lieu contribution of 10% of the value of the gross subdividable land is more appropriate. In terms of establishing a nexus between the development and its planning impact for the demand for public open space it is more fit that a credit be given for each existing lot that forms part of a subdivision between three(3) and five(5) lots. This discount to the cash-in-lieu contribution of 10% of the the value of the gross subdividable land could be calculated as a proportion of the maximum subdivison yield under the proposed tenure and relevant density code.

x) In Section 7.8 of the Policy Council should also consider making mention of considering cash-in-lieu contributions for open space for subdivisions creating greater than five(5) lots. There may be instances where the area of land to be dedicated for public open space is to small to be of practical use, or there is already adequate parkland in the locality. It may be that such larger subdivisons do not receive credit for any existing lot.

xi) With reagrds to Section 7.8.3 it is the practice of WAPC not to support requests by Council's for cash-in-lieu contributions based on the potential for maximum subdivisonal yield, if a sliding scale for lots created is used. This may be subject to legal challenge.

xii) Appendix 1 is not referenced in the text of the Policy. It should have a footnote explaining that the 'marks' mean the the requirement is applicable.

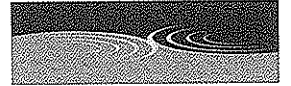
xiii) The Policy could also address the dedication of public open space in relation to Industrial Subdivision. See Policy D.C. 4.1 Industrial Subdivision.

If you have any further queries in regards to this matter please contact Anthony Deutschmann (Planner) on ph. 9892 7307, or email: Anthony.Deutschmann@planning.wa.gov.au

Yours sincerely



Stephen Petersen
Regional Manager, Great Southern Planning



Shire of Denmark
ICR104518
12 APR 2010
PLN59

DATE	LPH
FILE REF	
COUNCILLORS	
CEO	
DIR of FINANCE	
DIR of PLANNING	✓
DIR of INFRASTRUCTURE	
DIR of COMMUNITY	
OTHER	

Your ref: PLN59 SW/RH
Our ref: RF774
Enquiries: Mieke Bourne 98410102

SCANNED

Chief Executive Officer
Shire of Denmark
PO Box 183
Denmark WA 6333

Attention: Sam Williams

Dear Sam,

Re: Draft Town Planning Scheme Policy Public Open Space

Thank you for the opportunity to comment on the above. I would like to congratulate the Shire on the preparation of this policy.

It is very positive to see the integration and adoption of Better Urban Water Management into this policy.

The Department of Water (DoW) makes the following comments.

Under section 6, Areas of Conservation Value, there is reference to the determination of buffer widths. While the policies listed are useful it is our experience that providing a set figure for buffer widths is not always advantageous. We prefer to assess cases individually using biophysical assessments to determine appropriate buffers.

Under section 7.5.3 I would like to add that environmental issues such as algal blooms are additional reasons to limit the placement of perched lakes in POS.

Should you wish to discuss this matter further please contact Mieke Bourne of this office.

Yours sincerely

**CHRIS GUNBY
ACTING REGIONAL MANAGER
SOUTH COAST REGION**

9 April 2010



Mr Sam Williams
Director of Planning and Sustainability
Shire of Denmark
PO Box 183
DENMARK WA 6333

Dear Mr Williams

DRAFT TOWN PLANNING SCHEME POLICY PUBLIC OPEN SPACE

Thank you very much for the opportunity to provide comment on your draft public open space policy. The Department commends the Shire of Denmark in taking this proactive step toward ensuring appropriately sized, located and designed public open space (POS) to meet the needs of the community.

Despite the benefits of POS being internationally recognised, current State policy and process often does not result in spaces which deliver the most desirable outcomes for communities. A POS policy adopted under the Town Planning Scheme is therefore an essential vehicle for providing local interpretation of Liveable Neighbourhoods and subsequently ensuring the best outcome for the Shire of Denmark.

7.1 Assessment of Site Characteristics

- The schedule should include detail on the purpose, function and size of each individual POS and their percentage contribution towards overall provision. The identification of function requires the applicant to consider the needs of the future community and allocate POS accordingly.
- It is recommended that the following are included within the requirement for assessment of site characteristics:
 - Examination of soil quality and identification of contamination
 - Identification of site constraints, such as easements, powerlines, buffers etc
- It is also recommended that the Council's position be strengthened the inclusion of the clause that proposed POS exhibiting unacceptable criteria will not be accepted.

7.2 Areas of Conservation Value

- The Department strongly supports provision for recreational access to the natural environment, including conservation areas where practicable. It is however suggested that the policy provide an indication of Council's accessibility



requirements. These may include, boardwalks, limestone trail network, seating, signage (directional and interpretive) etc.

7.3 Rate of Provision and Distribution

- Whilst provision of POS is based on 10% of the gross subdividable area, applicants should be required to consider the open space needs of the community and respond to those needs accordingly with an appropriate mix of functions. Council could choose to address this by undertaking an open space needs assessment based on population and growth predictions and directly addressing the outcomes within the POS policy. Alternatively, Council could put the onus of such a needs assessment on the applicant, deliverable as a component of the structure plan.
- Under Liveable Neighbourhoods the delivery of POS has largely resulted in a proliferation of local and neighbourhood spaces at the cost of larger areas suitable for the development of playing fields. Council is encouraged to consider future development thresholds in relation to the need for additional sporting reserves and address accordingly within the policy.
- The location of neighbourhood open space should negate the need for a local open space within the same walkable catchment. Likewise, the provision of a district open space should negate the need for local and neighbourhood spaces within the walkable catchment.
- It is recommended that Council considers its position on provision of POS in excess of 10% of the gross subdividable area. This has occurred in a number of instances and has usually involved restricted open space associated with drainage functions and conservation. Whilst these may be desirable outcomes, it could potentially result in a significant increase in the maintenance burden to be borne by Council. It is suggested that in these instances, the applicant be required to provide a financial assessment report detailing the likely financial implications associated with the additional space.
- In addition to providing for ecological connectivity (as mentioned within the draft policy) individual POS allocations have the potential of contributing to a network of spaces for the purposes of encouraging pedestrian movement. As such achieving connectivity through trails and POS should be encouraged.
- Public open space should be fit for the intended purpose in terms of location, size, shape and topography.

7.4 Open Space Design Criteria

- POS should be designed to maximise environmental sustainability. This could include, but not be limited to:
 - Implementation of alternatives to irrigated turf
 - Reflection of best practice in water conservation, water harvesting and irrigation (eg hydro-zoned irrigation)
 - Retention of natural bushland within POS where possible
 - Use of endemic plant species in landscaping
- The inclusion of design principles may assist in guiding the desirable development of POS. Refer to Healthy Places and Spaces, (2009, Planning Institute of Australia, Heart Foundation and Australian Local Government Association) for design principles in relation to amenity, accessibility and useability.

7.6 Minimum Standards for Development

- Whilst provision is made for Council's minimum standard of development, consideration should also be made as to Council's position on over provision of POS amenity and infrastructure. The over-servicing of POS in the early stages of land release results in increased community expectations and an increased maintenance burden. Whilst an increased level of amenity may be desirable, this should be subject to approval. Requirement for whole of life cost estimates and indicative maintenance schedules and costs will assist Council with the decision making process.

7.7 Community Purpose Sites

- As a means of strengthening Council's position in determining the inclusion of community purpose sites within the POS contribution it is recommended that the inclusion of community purpose sites be subject to satisfying the criteria listed in 7.7.2.

Additional Comments

- It is recommended that the policy address the responsibility for the maintenance of POS, beyond the point of practical completion. Whilst the standard has traditionally been 2 years, a number of metropolitan local government authorities have successfully negotiated up to 5 years and are currently pursuing increased maintenance periods within their POS policies. This is of particular relevance where the level of provision is above and beyond a minimum standard.

I hope that these comments are of assistance in developing your POS policy. If you would like clarification or to discuss any points further, please contact Julie Rutherford, Facilities Consultant on 9492 9832 or via email at julie.rutherford@dsw.wa.gov.au

Yours sincerely



Steve Humfrey
Manager Facilities

22 April 2010