



**SUBMISSION TABLE**  
Forrestfield High Wycombe Industrial Area Development Contribution Plan  
2024 Annual Review

SUBMISSION NO.	SUBMISSION	CITY RESPONSE
1	<p>1. Item 2.2.1 Berkshire Rd. A 2m wide footpath is not required on the north side of Berkshire Rd. It will not provide a continuous path to Roe Hwy as there are no connecting paths on the north side at Roe Hwy. Pedestrians will need to cross Berkshire Rd to access the Roe Hwy underpass at a much busier and more dangerous location. Section 4 (e) of this DCP document says “- the City will actively seek grant funding to assist in the provision of DCP infrastructure.” This, the City achieved, in the form of the 3m wide path. Because the grant specified that the new path was to be built on the south side of Berkshire Rd instead of the north side, as proposed in the original DCP report, is of no fault of the DCP and the path should not be duplicated at a cost of approx. \$110,000 because of that decision. The verge on the north side of Berkshire Rd is approx. 7m wide and has virtually no services and would make an ideal location for the planting of trees as part of the City's suburban greening strategy, provided a suitable species was used and planted close to the fence line so as not to impede the view of vehicles leaving the adjacent properties.</p> <p>The 2 overhead power wires should not be included in this DCP. As previously acknowledged by the City, owners must supply their own underground feed on development. As both these properties are under development, this item should be removed.</p> <p>2. Item 2.4 Administrative Items. The administration costs are forecast to be \$110,000 when actual costs for the last 3 years are \$61,336, \$44,481 and \$64,228. A forecast of \$110,000 per year is excessive.</p> <p>3. Item 3.1 Cost Inputs and 3.2 Area Inputs are not accurate. Two property owners, Lot 217 Nardine and Lot 500 Ashby Cl, have applied to the City to purchase surplus road reserve adjacent to their properties. The City has acknowledged that proceeds of these sales should be returned to the DCP. As the DCP report is a forecast of future costs and events, the anticipated revenue should be accounted for, as are all costs and land valuations. These parcels of land, when sold, will be subjected to contribution payments by the owners. As a result of the sales, the Development Contribution area will expand and the Area of Road Reserve will diminish. There should also be account of the anticipated cash revenue from the sale of the land included in this report.</p> <p>Section 7</p> <p>4. Appendix A. Berkshire Rd. See paragraph 1 above.</p> <p>5. Appendix D. Bonser Rd (Stage 2)</p>	<p>1. Berkshire Road is a 'Distributor B' classification of road, carrying 8,300 vehicles per day (measured 2020/21), with a high volume of heavy vehicles. The road has a 70 km/hr speed limit and carries Restricted Access Vehicles (RAVs). The current footpath design is in compliance with Liveable Neighbourhoods (2009) requirements. It should be noted that the Designs for Berkshire Road remain conceptual (15 per cent); the City will endeavour to find design and cost efficiencies through the Detailed Design process.</p> <p>Refer to point 4 below for a response to the powerline submission.</p> <p>2. The administration cost forecast in the 2024 DCPR is informed by recent costs incurred, rather than an average of previous charges to the scheme.</p> <p>While the administration costs throughout the lifetime of the DCP have averaged at \$87,160 per year, the charged administration costs have seen a range of \$15,736, in the 2015/2016 financial year, to \$147,522.39 in the 2020/2021 financial year. Variations to the charged administration costs are a consequence of under reported officer time and increased legal costs due to State Administrative Tribunal (SAT) Appeals, etc. The average cost is therefore not a reliable source to forecast the future administrative costs for the DCP. Forecasting costs based on the most recent costs incurred is considered more appropriate.</p> <p>The 2024 DCPR forecasts a future administrative cost of \$428,000 or \$107,000 annually for the remaining lifetime of the DCP (4 years) and this is attributed by estimated costs of: a) \$47,000 in planning / project management costs; b) \$30,000 in legal fees; c) \$25,000 for infrastructure reviews. This includes annual BOQ reviews and the Detailed Designs for remaining infrastructure items; and d) \$5,000 for the annual land valuation required to inform the forecast land costs.</p> <p>3. This is a typographical error and has no impact on the advertised rate.</p> <p>The City is required to administer the DCP with certainty; as no land has transacted, it would not be appropriate for the DCP to be updated to increase the NCA. Should the land be successfully</p>



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	<p>It should be noted, that a complete breakdown of costs has not been provided. Why does this report show a cost escalation of 27% after a 20% increase in the last report? Neither figure appears to be correct.</p> <p>6. Appendix E. Nardine CI (Stage 2) The existing asphalt surface, base and crossovers are entirely suitable for an emergency accessway. The original owner drove his 8 tonne truck, towing a drill rig mounted on a large trailer, up and down this drive twice a day for 20 years. The current owner has continued to use it to transport machinery up and down since he bought the property. The photos below, clearly show the existing driveway and crossovers. It will not carry any vehicle traffic as it will have locked bollards at each end and will only be used, if required, in the case of a bushfire. I would suggest that most EAWs in the City are nothing more than rough tracks through the bush. The trees have been removed since that time as have the letterbox and gas connections. Items 2.01 to 2.07 incl. can be deleted. Item 6.01 should be removed as it is of higher quality than is necessary, or the difference in cost should be paid by the adjoining owner. If any retaining is required, that also should be paid for by the owner as the existing driveway is obviously the datum level. Item 6.02 is not a cost to the DCP as all fencing for Bush Forever was removed from the DCP in July 2020 (ref Appendix 8) and is the financial responsibility of the PTA as part of their Environmental Offset for the Airport rail line. As a result of the above, items 12.01 to 12.09 incl. should be deleted. Obviously, deletion of all these items will negate many of item 1 lines and necessitate alteration of all the “per centage” items. As the adjoining properties have the same owner, and two separate street frontages, I question whether this emergency accessway is still a legal requirement.</p>	<p>acquired, the City will update the assumptions informing the DCPR accordingly – i.e. the NCA should increase marginally.</p> <p>4. The upgrades to Berkshire Road provide for a RAV7 vehicle network throughout the precinct. Forecast costs include the undergrounding of remaining overhead powerlines, as the existing overhead powerlines obstruct the through movement of RAV7 vehicles. Undergrounding of powerlines occur when sites are redeveloped or as part of Western Power’s Targeted Underground Power Program (TUPP), whichever occurs first. Neither Western Power nor the City can require landowners to underground their power connections in the absence of the aforementioned triggers. At this stage neither of these connections have been converted to underground power, the status of the two (2) remaining connections will be monitored with each annual review, with the DCPR updated accordingly. SPP3.6 considers the relocation of power lines a reasonable DCP infrastructure cost.</p> <p>5. The 2024 DCP is proposing a forecast cost of <b>\$96,529 for Bonsor Road, a seven per cent increase to the 2023 DCP forecast cost of \$90,214. This cost escalation is consistent with cost escalations in the 2024 DCP.</b></p> <p>6. The Emergency Access (EAW) Way has been designed and will be constructed in accordance with State Planning Policy 3.7 (Planning in Bushfire Areas) (SPP 3.7). The standards, such as a minimum width of six (6) metres, are enforced to ensure thorough movement of firefighting emergency vehicles in the case of bushfire. While intended for emergency access only, it will remain unlocked to ensure unimpeded access in the event of an emergency.</p> <p>The City has been activity undertaking pre-construction work required to facilitate the works associated with Road 2A (Stage 2) – items 2.01 and 2.02 completed in December 2024.</p> <p>All referenced line items are required to facilitate the delivery of Road 2A (Stage 2): Item 2.03 - Mail box on site Item 2.04 - Electrical and communication pit throughout side Item 2.05 - Bollards on site- Bollards located adjacent to electrical and communication pits Item 2.06 - Relocation of fencing due to the requirement of boundary alignment, current entrance gate is situated within the proposed site location. Item 2.07 - removal of redundant seal was the result of accessway extension ( to 6 metres) Item 6.01 - Due to the site grades of site location, plinth is proposed to maintain soil, due to the realignment of project site boundary, this is to be included to the cost of the DCP. Item 6.02 - In order to accommodate the accessway extension, fencing post along the bush forever site will need modification. Items 12.01 to 12.09 - boxing out of existing pavement and sub grade work is required to accommodate the hydrant as per the design.</p>



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SUBMISSION NO.	SUBMISSION	CITY RESPONSE
	 <p>EAW view from Sultana Rd West</p>	



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	 <p>EAW view from Nardine CI</p> <p>7. It should be noted that item 5.7 is incorrect. Australian Standards does not allow for AC14 to be laid at 30mm. AC10 must be used as it is in Milner Rd. Item 5.8. Industry sources suggest that the price of \$38.52 (\$36.00 + 7%) is exorbitant. Item 10/13. The 7% price escalation appears to have been doubled in the stated 50% total costed to this DCP.</p> <p>8. Appendix I. See paragraph 2 above.</p> <p>9. No additional costs for consultants or staff administration should be charged to the DCP for corrections to this DCP report.</p> <p style="text-align: center;">High Wycombe.</p> <p>5 March 2025</p>	<p>7. Porter's BoQ pricing schedule notes Milner Road to have 30mm AC10 asphalt along with 40mm AC14 MRWA intersection mix. The BoQ pricing for Sultana Road West notes 30mm AC10 asphalt along with 40mm AC14 MRWA intersection mix for intersection areas. PCE 2021 year review noted a rate of \$18/m2. MAPL 2023 review applied a rate of \$36.00/m2. PCE 2024 review applied a 7% increase to the \$36.00/m2 rate to become \$38.52/m2. The proposed rate is considered to be within an expected range based on the small quantity.</p>



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2.1	<p>Submission No 1 TWO (2) WRONG STATEMENTS ABOUT STAGE 3 <i>Seek permission to publish, immediately prior to that date. Hopefully the relevant matters have been resolved by then.</i></p> <p>1. Amended LSP for Stage 1. Section 9.2, Page 57 refers to Stage 3 being light industrial land use.</p> <p>WAPC erred by wrongly approving the Amended LSP for Stage 1 in February 2020. WAPC initiated a MRS Amendment for Precinct 3 on 25 November 2014, and all the planning framework since then must show that. Section 9.2 contradicts their decision of 5 years prior.</p> <p>2. This second wrong statement is evidence presented at SAT WASAT 134 [2015] where the Shire said Stage 3 would be developed as light industrial land use</p> <p>If either document had reported properly, that is that Precinct 3 had replaced Stage 3 and the land to the northeast of Sultana Road West would be residential, then the appropriate buffer promised in the Council Minutes would have been reflected in the DCP Annual Reviews since 2014.</p> <p>Wrong statements do not avoid obligations.</p> <p>The DCP for Stage 1 owes a liability to afford the appropriate buffer. Council Minutes from 2012 state as much.</p> <p>The Shire will be confronted with managing that scenario in the next 1 to 3 months as we move to resolve the situation in a way outlined in WASAT 134 [2015], SPP 4.1</p> <p>Signed              High Wycombe. WA. 6057 March 2025</p>	<p>This submission is not relevant to the matter being advertised. The advertising period relates only to the Forrestfield Light Industrial Area – Stage 1 Development Contribution plan (DCP) 2024 Annual Review, not the LSP.</p>
2.2	<p>SUBMISSION FOR THE STAGE 1 DCP REVIEW March 2025 Submission No 2 The DCP For Stage 1 Refers To Something That Does Not Exist.</p> <p><i>Seek permission to publish, immediately prior to that date. Hopefully the relevant matters have been resolved by then.</i></p> <p>DCP for Stage 1 is based on the two (2) Structure Plans for Stage 1 FFHW Industrial Area plus the Local Planning Scheme No 3.</p> <p>My view is the LSPs, LPS3 and the decision in WASAT 134 [2015] have not been complied with.</p>	<p>This submission is not relevant to the matter being advertised. The advertising period relates only to the Forrestfield Light Industrial Area – Stage 1 Development Contribution plan (DCP) 2024 Annual Review, not the LSP.</p>



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	<p>It has been at great cost to our lives and financial loss.</p> <p>WASAT 134 [2015] para 87 <i>The range of possible land uses in the Industrial Development zone is 'very small' (T: 147.7; 14.08.15).</i></p> <p><i>Consistently with the objective of the zone '[t]o permit the development of the land for industrial purposes and for commercial and other uses normally associated with industrial development' (emphasis added), the narrow range of permissible land uses in the zone includes Logistics Centre, Office, Research and Technology Premises, Showroom, Storage and Warehouse (in addition to Caretakers Dwelling, Car Park, Fuel Depot, Industry-Light, Lunch Bar, Telecommunications Infrastructure, Trade Display and Transport Depot).</i></p> <p><i>Despite the title of the 'Industrial Development' zone, the range of permissible land uses and the objectives of the zone contemplate a mix of 'industry-light' and permissible commercial uses.</i></p> <p><i>Furthermore, as noted earlier, the LSP provides that 'preferred land uses' in the LSP area are 'logistics and other transport based industries' which take advantage of the proximity and congruence of significant transport infrastructure, including Perth Airport, railway and two major highways.</i></p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th>Transport-based Industry</th> <th>Commercial or Office</th> <th>Meets Design Guidelines</th> <th>cause injury to or adversely affect the amenity of the locality</th> <th>Remedy - Buffer (metres)</th> <th>Operates 7am to 5pm Mon-Fri</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>K Line Fencing</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>500</td> <td>Yes</td> <td>Prohibited</td> </tr> <tr> <td>FBR 122 SRW</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>500</td> <td>Yes</td> <td>Prohibited</td> </tr> <tr> <td>Golden Eggs</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>200</td> <td>No</td> <td>Prohibited</td> </tr> <tr> <td>Ascent Steel</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>500 - 1000</td> <td>No</td> <td>Prohibited</td> </tr> <tr> <td>FBR 90 SRW</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>500</td> <td>Yes</td> <td>Prohibited</td> </tr> <tr> <td>Allwest</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>500 - 1000</td> <td>No</td> <td>Prohibited</td> </tr> <tr> <td>Mader</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>500 - 1000</td> <td>No</td> <td>Prohibited</td> </tr> </tbody> </table> <p>Signed                        High Wycombe. WA. 6057 March 2025</p>		Transport-based Industry	Commercial or Office	Meets Design Guidelines	cause injury to or adversely affect the amenity of the locality	Remedy - Buffer (metres)	Operates 7am to 5pm Mon-Fri	Status	K Line Fencing	No	No	No	Yes	500	Yes	Prohibited	FBR 122 SRW	No	No	No	Yes	500	Yes	Prohibited	Golden Eggs	No	No	No	Yes	200	No	Prohibited	Ascent Steel	No	No	No	Yes	500 - 1000	No	Prohibited	FBR 90 SRW	No	No	No	Yes	500	Yes	Prohibited	Allwest	No	No	No	Yes	500 - 1000	No	Prohibited	Mader	No	No	No	Yes	500 - 1000	No	Prohibited	
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2.3	<p>SUBMISSION FOR THE STAGE 1 DCP REVIEW March 2025 Submission No 3 DCP for Stage 1 – Misleading Title</p> <p><i>Seek permission to publish, immediately prior to that date. Hopefully the relevant matters have been resolved by then.</i></p>	<p>The City is required to comply with the statutory framework. The DCP was gazetted with the title "Forrestfield Light Industrial Area – Stage 1 Development Contribution plan (DCP)", for further information refer to Schedule 12 of the City of Kalamunda Local Planning Scheme No.3.</p>																																																																



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	<p>I lodged an objection at the Council Meeting about the title when the Review was going out for public advertising.</p> <p>I have previously raised this issue in correspondence with the City and the Government.</p> <p>The Title on the DCP for Stage 1 is shown in the Agenda as Industry-light.</p> <p>This was challenged. There are allegedly industries operating in Stage 1 that are prohibited. They are Industry-General.</p> <p>The DCP for Stage 1 is a legal document. It should be accurate.</p> <p>My view is that advertising the DCP Review for Stage 1 as Industry-light was misleading.</p> <p>A concern is that the use in the title of Industry- Light, inhibits orderly and proper attention being given to the buffer.</p> <p>The WAPC should have intervened and reminded the City of the need to be able to justify advertising the Title as Industry-light.</p> <p>The City has never addressed its use of Industry-light.</p> <p>The DCP subsequently continues to fail to make provision for funding a buffer along the interface despite its promise to fund an appropriate buffer.</p> <p>The prohibited industries in particular, necessitate a significant buffer in the order of 500+ metres. Refer decision in WASAT 134 [2015].</p> <p>Mr David Caddy, TPG, had a 200-metre buffer in the DSP for HWS in 2016 on the assumption that Stage 1 would have only industries that came within the LPS3 definition of Industry-light. TPG had access to the ruling in WASAT 134 [2015].</p> <p>Signed              High Wycombe. WA. 6057 March 2025</p>	
2.4	<p>SUBMISSION FOR THE STAGE 1 DCP March 2025 Submission No 4 DCP FOR STAGE 1 PAYS FOR EVERY IMPACT IT HAS ON HWS PRECINCT</p> <p><i>Seek permission to publish, immediately prior to that date. Hopefully the relevant matters have been resolved by then.</i></p>	<p>In respect to an interface buffer, this is not a reasonable infrastructure cost to incorporate into the DCP. As the Forrestfield Light Industrial Area – Stage 1 preceded the residential zoning associated with the High Wycombe South (HWS) Residential Precinct Local Structure Plan (LSP), it would not be fair nor reasonable to retrospectively require the landowners in DCA1 to provide a buffer. The HWS Residential Precinct LSP requires developments to include interface treatments (Refer part 1 of the LSP) at the time of subdivision.</p>



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	<p>The DCP for Stage 1 needs to remain active as the DCP for Stage 1 must pay for every impact it has on the HWS Precinct.</p> <p>1. What is the City's plan to complete any unfinished business when the remaining land in Stage 1 is sold and the DCP lapses.</p> <p>2. Do the Ratepayers of the City of Kalamunda pay?</p> <p>The DCP Rate for land that needs to be purchased is currently \$420/m<sup>2</sup>.</p> <p>The DCP for Stage 1 is paying for at least the following</p> <ul style="list-style-type: none"> <li>- the "appropriate buffer" for HWS obligated to in the LSP and DCP for Stage 1 and</li> <li>- 100% of the costs for widening Sultana Road West. 50% is currently proposed to be allocated to the yet to be published DCP for HWS. This must be changed.</li> </ul> <p>The DCP has never published the Needs and Nexus for the residential precinct to pay anything towards the Stage 1 Industrial Development Zone to my knowledge.</p> <p>The City should present the information.</p> <p>We are not liable for the upgrade of Sultana Road West. We will refuse to pay.</p> <p>This means the DCP for Stage 1 pays 100% of the upgraded road from Milner Road to the cul de sac at 128 Sultana Road West.</p> <p>A buffer along the interface is a different scenario to consider.</p> <p>The City missed opportunities at previous reviews to address these matters. I viewed the reviews as dismissive and unhelpful.</p> <p>One hopes Council is alert to what is happening.</p> <p>Signed</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p>High Wycombe. WA. 6057 March 2025</p>	