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Enquiries: Phil Thompson

11 December 2019

East Wanneroo District Structure Plan Feedback
Department of Planning, Lands and Heritage
Locked Bag 2506
PERTH WA 6001

Dear Sir/Madam

SUBMISSION ON DRAFT EAST WANNEROO DISTRICT STRUCTURE PLAN

I wish to advise that Council considered the draft East Wanneroo District Structure Plan (DSP) at its meeting on 10 December 2019 and has endorsed the comments on the draft DSP included in the attached table.

Comment No. 17 in the table refers to the City's Place Framework, and this may be viewed at www.wanneroo.wa.gov.au/downloads/file/place_framework_2018. It also refers to an example being provided of one of the City's Local Area Plans and in this regard, the Girrawheen and Koondoola Local Area Plan may be viewed at www.wanneroo.wa.gov.au/girrawheenkoondolla.

In submitting these comments, Council also resolved that the Western Australian Planning Commission be advised that:

1. The Western Australian Planning Commission is commended for progressing the urbanisation of the East Wanneroo area through its preparation of the DSP.
2. In general, the DSP is considered a balanced document and is seen as an effective mechanism to provide a district-level planning framework for the area.
3. In particular, the City strongly supports:
 - (a) the requirement for all planning steps (eg: local structure planning for precincts) to be completed before approval of subdivision and development;
 - (b) recognition by the DSP of the significant environmental and landscape values of the area;
 - (c) the integration of future development and the various lakes within the area in order to enhance the sense of place and unique character of the area;
 - (d) the proposal to manage stormwater and the changes to groundwater levels in the area which will result from the proposed land use change, in a manner which will adequately mitigate flood risk, minimise fill requirements, and improve the environmental condition of the wetlands in the area;

- (e) the proposed parklands links and how this will provide a very attractive pedestrian-cycle route network around the area;
- (f) the proposed density and diversity of housing types, including the higher density in and around the activity centres as well as the proposed 'character areas';
- (g) the conceptual designs for the two proposed centres which should provide distinctive community focal points for the local community;
- (h) the identification of the central Transit Corridor route as the preferred alignment for a potential eventual East Wanneroo Rail Link;
- (i) the consultation undertaken with the Whadjuk Working Party and the resulting protection of an Aboriginal heritage site in Mariginiup.

Please let me know if you require any further information in respect to this submission.

Yours faithfully



Emille van Heyningen
**MANAGER STRATEGIC LAND USE PLANNING
AND ENVIRONMENT**

Attach:

COMMENTS ON DRAFT EAST WANNEROO DISTRICT STRUCTURE PLAN

No.	Draft DSP Proposal	Comment
1.	<p><u>Vision Statement: aspirational principles</u> (Executive Summary)</p> <p>There appears to be a gap between the DSP's broad vision statement, and the more detailed subsequent DSP proposals.</p>	<p>This gap could be addressed through including key aspirational guiding principles which are forward looking and acknowledge that the development of this area is going to be occurring well into the future. For example, the principles can address critical issues such as retention of local character, and addressing climate change and the implications of this for energy and water supply. These principles can be required to be had regard to in subsequent steps in the planning process for the area.</p> <p>It should be noted that most other DSP, including the Alkimos-Eglinton and Yanchep-Two Rocks DSPs, include such guiding principles.</p> <p>Regarding retention of local character, the DSP should emphasise that this should be seen to relate to not only the proposed 'character areas', but to the whole area. This is particularly recognising the potential presented by the extensive wetlands system in the area, and their significance in respect to Aboriginal heritage and culture. The Aboriginal heritage and culture should indeed be more fully referenced throughout the plan, in terms of its potential for 'place' creation and community education. The proposed activities centres also present particularly important opportunities for 'place' creation.</p>
2.	<p><u>East Wanneroo Rail Link (EWRL)</u></p> <p>(3.7 (Part 1); 6.3.2 (Part 2))</p> <p>Two options for the alignment of a possible future railway are shown, with the option aligned through the proposed urban areas being the preferred option.</p>	<p>The DSP should not present two options for the future EWRL. It is essential that the EWRL be aligned along the central Transit Corridor route in order to integrate the transport infrastructure into the urban area, to activate the area and increase public transport accessibility to the future community. The City strongly opposes the inclusion of a second option aligned along the Whiteman Yanchep Highway route.</p> <p>The Transit Corridor reserve must be suitable in terms of width and vertical and horizontal geometry to accommodate the EWRL and changes to technology in the future should be appropriately considered.</p> <p>The DSP should make it clear that the initial (pre-EWRL) Transit system will be undergrounded for those sections shown as underground on the main DSP plan,</p>

	<p>prior to the conversion of the initial transit system to a railway.</p> <p>Although it is acknowledged that this is outside the structure plan area, it should be noted that the City wishes to see the EWRl link with the Neerabup industrial/employment area to the north, with a station serving that area, as well as the nearby motor sports complex. The Neerabup area is anticipated to include future uses which are of a more intensive nature than the typical industrial areas of today, and which would mean that a station in this area would be well used, and assist in reducing private vehicle use, and provide the various benefits associated with that.</p> <p>Other major employment and activity centres will also require good public transport services and links to the railway stations, in particular the Wangara industrial area and the Banksia Grove district centre.</p>
<p>3. <u>Transit Route Link to Wanneroo Town Centre</u> (6.3.6 and Figure 2.12 (Part 2)) A rapid bus service route is proposed to link the Wanneroo Town Centre to the proposed Gnaragara district centre.</p>	<p>The 'rapid transit route' shown on Figure 2.12 linking the Wanneroo Town Centre to the Transit Corridor should be shown on the main DSP plan (Figure 1.1). The related DSP text should also refer to it as a rapid transit route (rather than a rapid bus service route) to make it clear that this route is ultimately intended to be a rail-type of transit service. This is an important activity and transport link between the new East Wanneroo urban area and the Wanneroo Town Centre, which is one of the City's key activity centres. It is also noted that the Wanneroo Town Centre will be the key economic and social centre to the new East Wanneroo community for many years until the development of the centres and other nodes in the area.</p> <p>The aim should be to have a light or heavy rail link from the EWRl to the Wanneroo Town Centre, and then further west to the Northern Suburbs rail line in the Joondalup City Centre. The Joondalup City Centre is a Strategic Metropolitan Centre and such a direct link to that centre will greatly improve the connectivity of the urban areas east of Lake Joondalup to both the Wanneroo Town Centre and the Joondalup City Centre.</p>
<p>4. <u>Roads</u> (3.7 (Part 1); 6.3 (Part 2)) A major road network is proposed for the DSP</p>	<p>There is inadequate consideration to east-west 'Other Regional Road' links between the DSP area and Wanneroo Road and Pinjar Road to the west. Elliot Road (west of Lenore Road) and Caporn Street should be designated as Integrator Arterial Roads, and reserved as Other Regional Roads on the MRS, to provide a more complete and</p>

area which involves a network of integrator arterial roads (proposed MRS 'Other Regional Roads') for the eastern part of the area, but no major roads linking the eastern area to the existing major roads to the west, other than Neaves Road and the Neaves Road realignment in the northern part of the DSP area.

The Neaves Road realignment west of the Whiteman Yanchep Highway is shown as an integrator arterial road.

Following the release of the draft DSP, the DPLH published a version of the main DSP map which shows the DSP proposals on a cadastral base (ie: showing property boundaries).

well connected major road network for this general area.

Elliot Road (west of Lenore Road) is of particular concern, as it is expected to be subject to continuing increases in traffic volumes as the new urban areas to the east develop. The DSP acknowledges this, but defers taking any action on it to future reviews on the DSP. However, upgrades required to the road to enable it to manage the increased traffic will entail widening of the road reserve and this will affect many adjacent properties. It would therefore be desirable for the widening land to be reserved in the short term so that land acquisition can progressively occur as properties come on the market.

The section of the Neaves Road - Flynn Drive east-west route west of the Whiteman Yanchep Highway should be a Primary Regional Road in the MRS, recognising its important linking function between the North-West and North-East Sub-regions.

The publishing of the main DSP map on a cadastral base has been of benefit in allowing landowners to see more clearly how their property would be affected by the proposals. However, it has also meant that some of the proposals which are of an indicative nature (eg: alignments of the integrator arterial roads and neighbourhood connector roads) have been understood by landowners whose properties have those proposals marked on them, to be necessarily affected by those proposals. This will not necessarily be the case:

- For the integrator arterial roads, the DPLHWAPC will soon be preparing detailed alignments and land requirement plans to inform proposed MRS amendments. Such detailed design work generally aims to avoid existing development, where possible.
- For the neighbourhood connector roads, detailed alignments and land requirement plans for these will be prepared as part of LSP preparation for each precinct. Again, this detailed design work would be expected to be aiming to avoid existing development, where possible.
- The DSP should clarify the indicative nature of some of the proposals shown on the DSP map (and state this on the DSP map itself). Information should also be

	<p>included explaining how the indicative proposals will be subject to further detailed design work to arrive at detailed proposals, and that in the course of this, existing development will be avoided, where possible.</p>	<p>The activity centres should be slightly repositioned to ensure that the Transit Stations are centrally located within these centres, so that all parts of the centre can benefit from proximity to the station.</p> <p>The City supports the provision of compact multi-level high schools within and near activity centres which would help activate the centres. However, it should be noted that high schools present considerable traffic issues at start and end of school hours and traffic and parking management plans will need to properly address this issue.</p>
5.	<p><u>Activity Centres</u> (3.1 and 3.2 (Part 1); 6.1.1 (Part 2)) The main DSP map shows a transit station near the edge of the proposed Gwangara district centre, and a transit station just to the west of the proposed Marigniuip neighbourhood centre. A high school is proposed on the edge of the proposed Gwangara district centre, using a multi-storey building format.</p>	<p>The two major proposed 'industrial' areas were designated as 'Industrial Investigation' areas under the North-West Sub-regional Planning Framework. It is understood that the preparation of the DSP had been intended to be the 'investigation' required to determine if these areas should indeed be future industrial areas. However, it is apparent from recent discussions involving a number of government agencies that a substantial amount of further work is required to properly address the future use of these areas, including the implications for the existing Water Corporation production bores in these areas (particularly the southern area), and the implications of any changes to those bores on groundwater management in the broader area.</p> <p>It is recommended that further investigation be undertaken as to whether these industrial areas are indeed required, and if so, for what types of uses, and over what timeframe.</p> <p>Despite the above comment, should the WAPC still propose to designate these areas for a particular use, they should be redesignated as 'employment' or 'economic development' or similar to indicate and better reflect that there is considerable flexibility as to what types of uses may eventuate in these longer term development areas.</p>
6.	<p><u>Industrial Areas/Employment Opportunities</u> (3.12, 4 (Part 1); 6.6, 8 (Part 2)) Two large areas in the current State Forest reserve area are designated as 'Industrial'.</p>	

		<p>Also, these areas need to be regarded as long term development areas, and not be permitted to develop in the shorter term and potentially compromise the development of the Neerabup industrial/employment area.</p> <p>The draft DSP states that up to 20,000 jobs may ultimately be created in the DSP area.</p> <p>Those jobs will be part 'population-driven' jobs which will be associated with any major new urban area (eg: jobs associated with the activity centres and schools throughout the area), and partly jobs associated with the industrial/employment areas shown on the plan. As noted above, those latter areas should be subject to further investigation, however an over-riding consideration that should be informing these investigations is the need to promote local job creation in this general area.</p> <p>This is particularly important, noting that the urbanisation of the East Wanneroo area will see the displacement of existing agriculture (and its associated jobs) by urban development. However, it is noted that the loss of these existing jobs will be far outweighed by the new job creation associated with the development of the DSP area.</p> <p>It is also noted that the proposed significant population growth in the DSP area will have a positive impact on existing nearby activity centres, particularly the Wanneroo Town Centre, which should receive a significant boost, including local job creation, and will support the realisation of the recent Council adopted Wanneroo Town Centre Activity Centre Plan (noting that this still requires approval of the WAPC). This will particularly be the case if the Wanneroo Town Centre is well linked to the proposed transit/railway route, which is being recommended.</p>
7.	<p><u>'Tourism Opportunities' Area</u> (3.13, 4 (Part 1); 8 (Part 2)) A 'Tourism Opportunities' area is proposed just to the east of Lake Jandabup.</p>	<p>While the designation of areas for this purpose is supported, more detailed clarification of the type of uses envisaged for this area should be provided, including some specific examples, particularly to indicate how such uses are seen to fit with the plan's proposal that this remain a rural area. Some guidance regarding how the interface of this area with the adjacent 'Industrial' area to the east may also be helpful.</p>

8.	<p><u>Water Management</u></p> <p>(3.10 (Part 1); 6.5 (Part 2))</p> <p>It is proposed that more detailed groundwater modelling be done to enable a District Water Management Strategy (DWMS) to be prepared, and that this will include establishing 'controlled groundwater levels' across the DSP area. Those levels are intended to enable drainage management to be undertaken (including sub-soil drains) such that high groundwater levels (in the order of a 3 to 4m increase) that would otherwise present significant problems for development, will not occur, and the need for fill to achieve adequate clearance above maximum groundwater levels will be minimised.</p>	<p>Due to the importance of water management in the area, the proposed management of groundwater and stormwater in a manner which will minimise requirements for fill to achieve adequate clearance above groundwater levels is supported, provided that the proposed District Water Management Strategy (DWMS) that will inform this approach is approved by the Department of Water and Environmental Regulation.</p> <p>The minimisation of fill is important not only to reduce use of an important basic raw material (sand), but also to enable the natural landform and topography to be retained as much as possible. This not only enhances the creation of distinctive and attractive places, but also should allow existing vegetation to be retained as much as possible (which will also contribute to 'place' creation).</p> <p>This can be compared to many other current urban development areas where significant bulk earthworks are undertaken and the resulting urban development is lacking any distinctive character.</p> <p>The DSP needs to ensure that the above approach is effectively implemented through the subsequent planning and development stages, including an over-riding principle that bulk earthworks are minimised with a view to the maximum retention of existing landform, bushland and significant trees. Existing vegetation (particularly significant trees) should be retained wherever possible, and not just in regional and local parkland areas, but also within the urban development itself.</p> <p>The preparation of the DWMS should include consideration of the longer term 'export' of excess groundwater in the area as a result of the urbanisation of the area, to the North Wanneroo area for use by growers, and to facilitate possible longer term intensive agriculture area that may be developed with the Jandabup industrial/employment area, should that proposal be retained in the final DSP.</p>
9.	<p><u>District-level Development Contribution Plan (DCP)</u></p> <p>(2.2.2 (Part 1)).</p> <p>It is proposed that the district-level DCP be</p>	<p>The City strongly objects to the proposal that the district-level DCP be prepared and managed by the City. When DSPs are prepared by the State Government and district-level DCPs are required as key implementation tools for the DSP, the State Government or some other implementation body should also be responsible for the district-level DCP.</p>

prepared (and presumably managed) by the City.

This is particularly the case where the State Government is proposing to cap contributions for community infrastructure to such an extent that only a small proportion of the cost of that infrastructure would be met through developer contributions.

It is estimated that the cost of district-level community infrastructure in the area could be approximately \$350 million. The draft State Planning Policy (SPP) 3.6 – Infrastructure Contributions (released by the WAPC in July 2019) proposes a maximum levy of \$2,500 per dwelling for local community infrastructure, and that if district and/or regional community infrastructure is also proposed, then the maximum levy may be increased by \$1,000 per dwelling, to a total of \$3,500 for a combination of local, district and regional community infrastructure. It has been inferred from this that if it is proposed to have a DCP dealing just with district and/or regional community infrastructure, then under the draft SPP, a maximum levy of \$1,000 per dwelling would apply. If this is the case then a shortfall of approximately \$300 million could result. It would be contrary to the user-pays and need-nexus principles of development contributions for such a substantial funding shortfall to be expected to be partly met by the existing residents and ratepayers in the City, and would mean a significant annual increase in Council rates over many years, which would be unlikely to be possible anyway if the Government decides to proceed to cap rate increases.

Another possible consequence of capping of infrastructure contributions is that infrastructure may not be delivered, or may be significantly delayed, both being to the detriment of the local community.

The Community Facilities Plan adopted by Council to inform the DSP, was on the basis that there is no 'cap' on the potential contribution by DCPs to fund community infrastructure. If 'caps' are introduced as part of the current review of State Planning Policy 3.6 – Development contributions for infrastructure, then the Community Facilities Plan will have to be substantially amended to reflect this change. This may potentially mean that the level and amount of infrastructure could be reduced to reflect reduced income generated by DCPs.

10. Local-level DCPs It is assumed that this is intending to be referring to both Local Structure Plans and

	<p>(Figure 1.2 (Part 1)). Figure 1.2 refers to 'Local Structure Plan Development Contribution Schemes', and with 'Development Proponents' being responsible for the preparation of this.</p>	<p>local-level DCPs, and that both of these are to be prepared by development proponents. If this is the intention, then the Figure should clearly say this.</p> <p>In respect to development proponents being responsible for preparation of local-level DCP's, while this is supported, it is assumed that WAPC will be expecting that the local-level DCPs, once prepared, will be subsequently managed by the City. Given the significant financial risk to the City in managing DCPs, (particularly if subject to caps on levies which may mean that only a relatively small proportion of the infrastructure costs may be able to be collected through the levies), the City does not agree to assume such management responsibility. Preparing and managing DCPs can also be extremely resource intensive, and this can be compounded through managing community expectations for infrastructure provision, when the funding for this is restricted through capping of levies. The City therefore wishes to work with the WAPC in investigate possible alternative approaches to management of DCPs.</p>
11.	<p><u>Local Structure Plans (LSP)</u> (Figure 1.2, 2.2 (Part 1)) The planning process set out in the flowchart in Figure 1.2 of the draft DSP suggests that LSPs will be prepared subsequent to determining of proposed regional reserves and lifting of deferment. The process described in section 2.2 of Part 1 also refers to these district-level steps being completed prior to commencement of precinct-level processes, including LSP preparation (although it does refer to some steps being done in parallel or concurrently).</p>	<p>It is clear LSP preparation will be expected to play an important role in undertaking the district-level steps, and this may be why 2.2.6 of Part 1 refers to a precinct 'concept local structure plan' being prepared to support requests for lifting of deferment.</p> <p>It is recommended that the role of LSPs in the process be more clearly explained and better depicted on the Figure 1.2 flowchart.</p>
12.	<p><u>Reservation of MRS Other Regional Roads</u> (Figure 1.2, 2.2 (Part 1)) It is unclear from the draft DSP as to whether the proposed Other Regional Roads are intended to be reserved for that purpose on the</p>	<p>From discussions with DPLH officers, it is understood that MRS amendments to reserve the proposed Other Regional Roads are now intended to be done by the WAPC through a limited number of MRS amendments across the whole East Wanneroo area, rather than on a precinct basis. The DSP should clarify this matter.</p>

	MRS on a precinct, or some other basis.	
13.	<p><u>Planning of Major Infrastructure</u></p> <p>(Appendix H, Engineering Servicing Report) The Engineering Servicing Report advises that the Water Corporation and Western Power will be reviewing and updating their servicing concept planning for the DSP area, and provision will need to be made in some future road reserves for accommodating some of this infrastructure.</p>	<p>WAPC should request the Water Corporation and Western Power to review their infrastructure planning for this area as soon as possible, as this information will be needed to determine the reserve width required for some of the proposed Other Regional Roads.</p>
14.	<p><u>Precinct Boundaries and Terminology</u></p> <p>(4 (Part 1); 8 (Part 2)) The draft DSP divides the DSP area into 28 smaller 'precinct' areas</p>	<p>Precinct boundaries should be reviewed to have more regard to future land use boundaries and staging, as well as facilitating precincts independently managing groundwater and stormwater issues affecting each precinct. This particularly relates to the boundaries of some of the major Parks and Recreation areas which contain wetlands, where a precinct comprising the full wetland reserve area may enable the total wetland area to be considered in a comprehensive manner, rather than a piecemeal manner through it being included in a number of precincts adjacent to the wetland.</p> <p>Given the use of the term 'precinct' in draft State Planning Policy 7.2: Precinct Design, to avoid confusion, and the likelihood that 'precincts' as per SPP 7.2 will subsequently be designated within the DSP area, the DSP should use a different term for its 'precincts' or define and clarify the use of the term in the DSP.</p>
15.	<p><u>Infrastructure Provision</u></p> <p>(7 (Part 2))</p> <p>The draft DSP indicates that a significant amount of new infrastructure will be required over time to enable the development of the DSP area, however does not provide any prioritisation of this infrastructure.</p>	<p>Whiteman Yanchep Highway needs to be constructed north to the proposed Neaves Road-Flynn Drive link in the near future to relieve peak hour pressure on Wanneroo Road and the existing local roads in this area (particularly Lenore-Franklin Roads) and also to stimulate the development of the Neerabup industrial/employment area, through providing improved access to key freight handling facilities to the south, particularly the ports and Perth airport.</p> <p>Similarly, construction of the Neaves Road-Flynn Drive link needs to occur in the</p>

<p>near future to improve access between the Neerabup industrial/employment area and the major freight handling facilities at Muchea and its links to the North Link infrastructure.</p> <p>While the draft DSP notes that there is currently some spare capacity in the existing wastewater and water mains adjacent to this area, it is important that the Water Corporation continues with its current projects to connect this area to the Alkimos Wastewater Treatment Plan and to increase capacity of the water supply infrastructure as soon as possible.</p>		
<p>The WAPC/DPLH is requested to undertake focussed community engagement with the residents and landowners in the DSP area where there are clear differences in the views of local residents about the future of their particular areas. This particularly applies to the southern part of the DSP area (which was shown remaining rural on the 2011 East Wanneroo Structure Plan, but designated as Urban Expansion on the Planning Investigation on the 2018 North-West Sub-regional Planning Framework), where it is clear that such differences in views exist.</p> <p>Such targeted engagement would assist the WAPC in understanding the community's support or objection for what the draft DSP may be proposing for each area, and in being able to have regard for that in determining the final DSP proposals for each area.</p>	<p><u>Community Engagement</u> (4.4 (Part 2)) The draft DSP refers to the input to the preparation of the draft provided by the Community Reference Group established by the DPLH.</p>	
<p>While the DSP has identified the four proposed 'character areas', it should be noted that they are all located central to the DSP area and are residential in nature only. It is expected that precincts in the northern, southern and eastern extents of the DSP area would have differing character that should be protected as well. Further, the activity centres (which are the main focus of place distinctiveness across the metropolitan area) should be discussed in the context of place creation. The wetland system which is a major character feature of the DSP area should also be further highlighted. As noted earlier, the Aboriginal heritage and culture associated with the wetlands present considerable potential for place creation and community education. Further consideration is recommended on this, and where other unique characteristics (other than residential development) might warrant special protection/attention.</p>	<p><u>Place Creation and Activation</u> (3.5 (Part 1); 6.1.4 (Part 2)) This draft DSP designates four 'Character Areas'.</p>	

		<p>Information will be provided to the WAPC regarding the City's Place Framework, and an example of the City's Local Area Plans. The purpose of this will be to highlight that the City and its community wishes for retention of local character to be a key consideration through all planning stages for the urbanisation of this area, and that this is reflected in the City's Strategic Community Plan.</p> <p>The draft DSP's vision statement and the draft vision for the City's 'Transitional Rural' Place Management Area are very similar and this is pleasing to see. However, there needs to be sufficient guidance in the DSP on how its vision will be realised and the key elements protected through subsequent planning stages.</p> <p>It is acknowledged that the DSP is a high level strategic document to guide future urbanisation, however an increased focus on places for people and how this will be facilitated through the planning process should be included. To this end, the DSP should state that the preparation of Place Activation Plans should be a requirement of future activity centre plans when they are prepared.</p>
18.	<p><u>Other State Government Community Facilities</u></p> <p>The only State Government Community facilities addressed are schools.</p>	<p>The DSP should address possible requirements for other types of State Government community facilities, including hospitals.</p>
19.	<p><u>Staging of Development</u></p> <p>(6 (Part 1))</p> <p>The draft DSP includes a staging plan which shows development generally extending sequentially eastward, from the existing developed areas to the west. However, it is also stated that: "The fragmented nature of land ownership across the EW DSP area may mean that some more consolidated landholdings can be initiated ahead of the development front. In</p>	<p>The proposal to allow for areas ahead of the development front to be able to proceed ahead of what the DSP staging plan is otherwise indicating, is supported, provided the DSP conditions for allowing such pre-frontal development are strictly applied, and also that it is clear that the planning steps set out in the DSP (local structure planning etc) are still required to be undertaken on a precinct-basis. Further, in addition to pre-funding of capital costs of infrastructure provision, funding of community service provision, at least on an interim basis, may also be required (eg: subsidising of public transport services for a period of time).</p>

	<p><i>these situations, it will be the responsibility of a proponent to make the case why this should occur, demonstrate adjacent precincts are not disadvantaged or development potential compromised, demonstrate support from service providers and pre-fund the capital costs associated with necessary infrastructure provision."</i></p>	
<p>20.</p>	<p><u>Equestrian Trails</u></p> <p>The draft DSP proposes to retain the Nanovich Park reserve as regional Parks and Recreation reserve, and proposes to retain the existing equine-based Special Rural areas at Lake Adams and the Meadowlands estate area (Neaves Road). It also proposes a staging of development that would allow many properties that currently have horses to continue to have horses for many years.</p>	<p>Given the draft DSP proposals affecting future equestrian uses, the DSP should require that the further planning of the area (eg: preparation of local structure plans) should consider provision of equestrian trails through suitable parts of the DSP area.</p>
<p>21.</p>	<p><u>Parkland Links</u></p> <p>The draft DSP proposes a network of proposed 'parkland links'.</p>	<p>While the proposed network of parkland links shown on the DSP map is supported, the DSP should require that when these links are planned in further detail, adequate widths are provided to ensure the ecological viability of the links.</p>