

Writing a Submission on Planning and Development Proposals

The City regularly advertises planning and development proposals to seek feedback (submissions) from landowners, occupiers and the community. This information sheet aims to assist persons interested in a planning or development proposal to prepare an effective submission as part of the City's community consultation and engagements.

What is a submission?

A submission is written comments received from a member of the public on a planning or development proposal that has been advertised for public comment. Persons may indicate their support, objection and/or provide comments on a proposal. The City considers submissions it receives before making a decision or recommendation on a planning or development proposal.

For a submission to be considered it must be in writing. During the advertising period for a proposal a Submission Form for members of the public to complete will be made available on the City's website see link below:

<https://www.armadale.wa.gov.au/out-comment>

You only have to lodge one (1) submission to have your views considered.

What planning and development proposals are advertised?

The City advertises a range of planning and development proposals ranging from structure plans for new developing areas covering large areas of land down to small scale developments or changes in land use on a single lot.

The City may determine a proposal requires advertising for public comment or it may be required by planning legislation such as the City's Town Planning Scheme and Planning Regulations that specify public consultation requirements. Other proposals may require advertising under the Local Government Act or other legislation administered by the City.

How are planning and development proposals advertised?

Planning and development proposals are advertised in one or more of the following ways:

- City's website;
- letters to landowners and/or occupiers likely to be affected by a proposal;
- signs erected on land subject to a proposal;
- local newspaper notices; and/or,
- letters to public agencies and service providers likely to be affected by a proposal.

Where can I get more information?

During the advertising period, plans and supporting documents (if part of a proposal) can be viewed during business hours - 8:15am to 4:45pm at the City's main administration - 7 Orchard Avenue, Armadale City Centre, and downloaded from the City's website at:

<https://www.armadale.wa.gov.au/out-comment>

Depending on the proposal, the City may be able to send additional information by email upon request. Please contact the City's Planning Information Services in this regard.

Who can I talk to at the City?

Your first point of contact is the City's Planning Information Officers who can assist with general enquires regarding proposals, how to make a submission and view the plans and supporting documents at the front counter of the City's main administration building. If further advice on the proposal is required, the allocated Planning Officer (name on the notification letter or at the top of the Submission Form) can be contacted.

What should I do before I lodge my submission?

- read this Information Sheet;
- review the plans and supporting documents at the City's main administration building and/or on the City's website;
- consider the relevant planning documents;
- if you are uncertain about any aspect of a proposal contact the City's Planning Services; and,
- consider the information you have gathered and lodge your submission using the Submission Form if provided.

What are acceptable grounds of support or objection to a planning or development proposal?

Grounds for objection or support will generally need to be 'planning related'. The following are some examples:

- the height, bulk, scale or appearance of buildings;
- impacts to streetscapes, and adjoining properties including privacy and overlooking;
- impacts on local amenity clearly described for some proposals;
- the suitability of landscaping provided;
- traffic, noise, smell, light and other potential amenity impacts;
- the appropriateness of access arrangements to the site of a proposal;
- impacts on built and cultural heritage values;
- the suitability of the land to the type of development proposed;
- compatibility of the proposal with other use/development in the locality;
- environmental impacts such as air or water pollution or land degradation;
- health and safety concerns including bushfire risk; and,
- access to and the adequacy of public infrastructure and services.

What matters cannot be considered in a submission?

The following are some examples of matters that are not considered to have planning relevance:

- a potential effect on land values;
- management related issues, that is, how an activity or a business is conducted, or the possible behaviour of individuals /patrons/customers;

- assumptions or hearsay;
- judgements based on personal prejudices or bias, an example being a dislike for the proponent or a dislike of any change;
- objections that relate to religious beliefs, morals or ethics;
- competition, an example being where a person considers there is an oversupply of a particular service and any additional service should not be permitted, unless it is detrimental to the character of an area.

I didn't receive a letter about a proposal. Can I still lodge a submission?

Anyone can lodge submission on a proposal during the advertising period. If the comment period is closed please discuss with the assigned Planning Officer to determine if a late submission will be accepted.

Where do I lodge my submission?

You can lodge your submission in the following ways:

By email to:

info@armadale.wa.gov.au

By post to:

City of Armadale
Locked Bag 2
ARMADALE WA 6992

In person to:

The City's main administration building – 7 Orchard Avenue, Armadale City Centre.

By including your email address on the Submission Form, the City can provide more prompt notifications to you on the proposal.

What if I lodge my submission after the closing date?

There is no guarantee that a late submission will be considered and the acceptance of late submissions is at the discretion of the City. The City does not normally grant time extensions for submissions on a case-by-case basis but a lodgement date may be extended in special circumstances.

What happens to my submissions after lodgement?

Once a submission is received, the City will generally:

- Send an acknowledgement letter/email to those who lodged a submission.
- If the proposal requires the determination of Council, prepare a report that will consider submissions and make recommendations on the proposal. The report will identify the number and nature of submissions received and respond to the key matters raised i.e. whether the issue/concern raised is supported or not on planning grounds. Modifications to a proposal may be recommended to address issues/concerns if appropriate.
- It should be noted that a recommendation to support or refuse a proposal is not based solely on the number of objecting or supporting submissions received, but rather on a proposal's planning merit as a whole. In this regard, the City will consider the requirements of its town planning scheme and local planning policies, State planning frameworks (policies and plans), the Planning and Development Regulations and the comments and requirements of State Government agencies.
- If the proposal requires the consideration of Council, the City will notify submitters who

provided an email address in their submission of the date of the Development Services Committee (DSC) meeting (open to the public) wherein the report, submissions and recommendations on the proposal will first be considered.

- A Schedule of Submissions will be publically available but personal information i.e. names and addresses of submitters, will only be available in a confidential schedule available to Councillors only.
- The recommendation of the DSC on the proposal will then be presented at the next available meeting of Council for its decision.
- A notification letter/email of the Council's decision or recommendation on the proposal will be sent to those who lodged a submission.

Some planning proposals i.e. local planning schemes, scheme amendments, structure plans, and development contribution plans are subject to additional approval processes of the Western Australian Planning Commission (WAPC) and/or Minister for Planning. Also some large scale (high cost) developments are determined by the Joint Development Assessment Panel; a decision making body separate to the City.

The City will notify those who lodged a submission of the final decision or outcome on a proposal made under these further approval processes/decision making bodies.

Further Information

For further information, refer to the Planning section of the City's website where the following information is available:

- Town Planning Scheme No. 4
- Local Planning Policies
- Information Sheets
- Schedule of Fees and Charges
- Application for Development Approval

- Development Application Checklist

Further information on planning and development approval processes can also be obtained from the Department of Planning, Lands and Heritage web site, links below:

<https://www.dplh.wa.gov.au/lpsregs>

<https://www.dplh.wa.gov.au/daps>

or

Contact the City's Planning Services for further information via email to

info@armadale.wa.gov.au or phone on 9394 5000.

Please note the information contained within this brochure is intended as a guide only. It is recommended that advice and assistance of City's Planning Services staff be sought prior to lodgement of your submission. The City of Armadale disclaims any liability for any damages sustained by a person acting on the basis of this information.

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