



Your Ref: RLS/1120  
Our Ref: 161178704 (MRS402940)  
Enquiries: [REDACTED]  
Direct Tel: [REDACTED]  
Email: land.planning@watercorporation.com.au

13 November 2023

Director General  
Department of Planning Lands and Heritage  
140 William Street  
PERTH WA 6000

Attention: [REDACTED]

### **Proposed MRS Amendment - Bullsbrook South Urban Expansion Area**

Thank you for your correspondence of 5 October 2023 inviting preliminary comments on the proposed South Bullsbrook MRS amendment.

The *Bullsbrook Townsite District Structure Plan* was prepared under the provisions of the City of Swan's Local Planning Scheme and approved by the Western Australian Planning Commission in 2018. The DSP provides guidance and advocacy for development of the townsite to 2031 and beyond. Among other things the DSP includes a land development staging plan and outlines that: development is to commence in the north-western portion of the site adjoining the current townsite boundary with access provided off Chittering Road and development of a display village, sales office and initial subdivision stages. Development will then move eastwards and southwards and deliver a new District Activity Centre. The provision of engineering infrastructure and primary internal road network will also need to be staged to suit the development demand and/or suitable access at an early stage.

The proposed urban rezoning of the extensive area of land in South Bullsbrook is well beyond the current urban development front and is considered to be premature and contrary to the staging in the approved Bullsbrook Townsite District Structure Plan.

Conceptual Infrastructure planning is in place and the required capital projects for water and wastewater projects have been identified and timed in the Corporation's capital program to serve the current extent of 'Urban' zoned land within and south of Bullsbrook. The currently zoned land represents over ten years of land supply at the current development rate.

In similar situations elsewhere in the metropolitan area where development is proposed to leap-frog the logical and orderly development front, an option may sometimes be available for proponents to fund water and wastewater infrastructure to suit their development aspirations and location. In some locations, it may be possible to install temporary, or smaller scale wastewater infrastructure to allow early stages of development to occur. However, because of the distance of Bullsbrook from the available wastewater discharge points at Barrambie Way Main WWPS in Ellenbrook and the Millhouse Rd WWPS in Aveyley, a viable temporary wastewater solution to serve the proposed amendment area in South Bullsbrook is not available.

Longer term, larger scale, bulk wastewater transfer from Bullsbrook to Barrambie Way Main WWPS in Ellenbrook are yet to be proven feasible and requires an understanding of other land development and zoning decisions for the proposed North Ellenbrook urban expansion area and the need to secure land through Ellenbrook to accommodate for sewer main routes. A likely bulk wastewater transfer arrangement from Bullsbrook south to Ellenbrook is likely to also need to include hydraulic allowance to service the proposed North Ellenbrook urban expansion area.

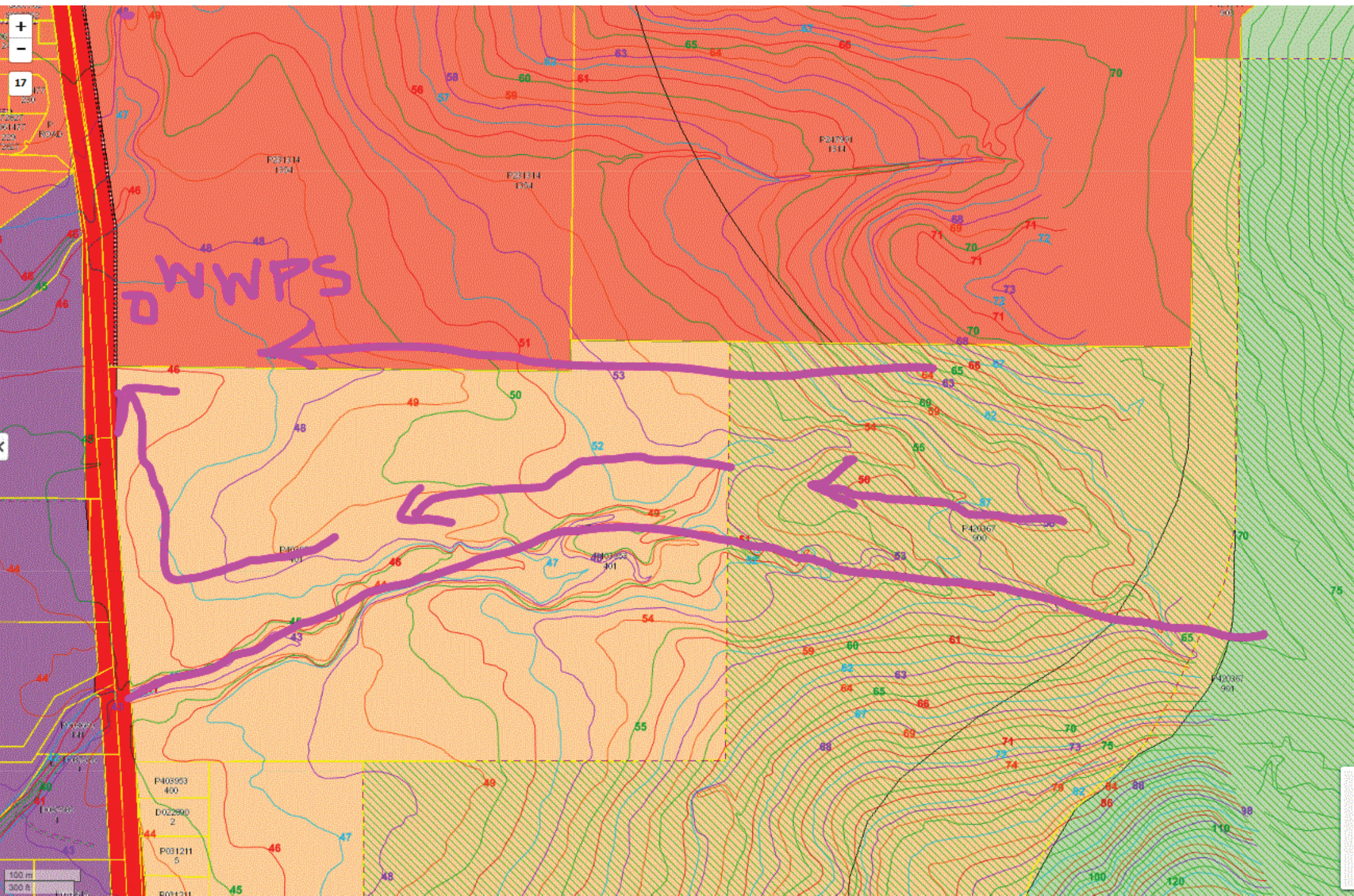
The indicative capital costs for such a bulk wastewater conveyance (wastewater pump stations, pressure mains, mains sewers upstream of Barrambie Way WWPS, and upgrades to Barrambie Way WWPS) to service the whole of South Bullsbrook together with planned urban expansion in North Ellenbrook is estimated to be over \$60 million. Bulk works of this scale, cost and technical complexity would usually be delivered by the Water Corporation over many decades as the land between Ellenbrook and South Bullsbrook is incrementally developed.

The ability to bring forward works of this scale has not yet been demonstrated to be technically feasible and the Water Corporation is not able to advance capital funding of this quantum to undertake these works earlier than would normally be required.

A portion of the amendment area (being the northern parts of Lot 401 and Lot 900 to the north of the creek line as generally depicted on the attached sketch) grades topographically into the catchment of the planned South Bullsbrook Interim WWPS, which will be constructed within the next 2 years in the Oakland development area. The Water Corporation has no objection to this portion of the amendment being lifted from "Urban Deferred" to the "Urban" zone.

If you have any queries or require further clarification on any of the above issues, please contact me on [REDACTED]

[REDACTED]  
Senior Planner, Land Use Planning  
Development Services



DWWPS

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100 m  
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