

City of Kalamunda Preliminary Submission Metropolitan Region Scheme Amendment Wattle Grove South

The City of Kalamunda (City) appreciates the opportunity to provide a preliminary submission on the proposed Metropolitan Region Scheme (MRS) Amendment for a portion of Wattle Grove South.

The Submission has been broken into two parts, the first with specific comments relating to the MRS Amendment Report and the second section providing an assessment of the proposed Amendment against relevant strategies and policies. This submission should also be read in conjunction with the City’s Council Report presented at the August 2021 Ordinary Council Meeting.

1. MRS Amendment Report

No.	Section	Comment
1.	General	<p>Comments in this submission should be factored into the proposed project commitments of the MRS Amendment. The proposed project commitments are supported by the City in addition to the comments outlined in this submission. It is the City’s expectation that these commitments are followed through at structure plan and subsequent implementation phases.</p> <p>The Planning and Development Act 2005 allows amendments to the MRS to be processed as either “minor” or “major” amendments depending on whether they are considered to constitute a substantial alteration to the MRS or not. This amendment is considered to meet the WAPC’s ‘minor’ amendment criteria for the following reasons:</p> <p>a) The size and scale of the proposed amendment is not considered regionally significant as it does not reflect a regional change to the local planning strategy or philosophy for the metropolitan region.</p>



		<p>b) The proposal aligns with the WAPC’s North-East Sub-Regional Planning Framework which identifies the rezoning area as an Urban Expansion area.</p> <p>c) All service infrastructure can be readily provided to service the development via extensions to the existing network within the adjacent neighbourhood.</p>
2.	General	The site is described as largely cleared, but the remaining tree canopy plays a significant role in providing habitat including a food source for Black Cockatoos. The undeveloped nature of the site and remnant trees have residual ecosystem service values including a minimal contribution to any urban heat island effect. There must be significant value placed on these trees. Retention of as many of these mature trees as possible should be attempted with a significant design effort requested to ensure these natural features are retained.
3.	Section 2.1 Location	Should state High Wycombe Station rather than Forrestfield Station.
4.	3.4 City of Kalamunda Local Housing Strategy (Draft)	The LHS is now adopted (27 July 2021). See minutes - https://www.kalamunda.wa.gov.au/council/council-committees/agenda-minutes
5.	4.2 Neighbouring Land Use Considerations – Noise, Odour and Dust	It is recommended that measures are put in place to appropriately deal with the interface of the businesses in the area that is bound by Brentwood Road, Welshpool Road East and Tonkin Highway with the new residential development.
6.	4.2 Neighbouring Land Use Considerations – Noise, Odour and Dust	It is recommended that measures are put in place to appropriately deal with the interface of the new residential area with remaining rural landholdings.
7.	4.4 Biodiversity and Natural Assets	It should be noted that there were limitations to the AECOM survey- <i>‘The ecological assessments were successfully completed for the Wattle Grove South Project. Obtaining access to all private properties was a significant limitation with 94 properties accessible from approximately 262 properties. It is likely that the other properties that were not surveyed have significant environmental value.’</i>
8.	4.4 Biodiversity and Natural Assets	Site specific flora surveys will need to be undertaken for properties that have not been surveyed to determine whether the vegetation types represented are TEC’s and whether threatened flora are present.



9.	4.4.1 Flora and Vegetation	The site vegetation is described as highly fragmented. The City recommends that a feature survey is provided at structure plan stage where all natural assets are mapped and prioritised to determine which natural assets are to be retained in through corridors of POS and road reservations. The linkages should be designed having regard for ecological principles, that is to ensure they are appropriate for the movement of target organisms.
10.	4.4.1 Flora and Vegetation	It should be noted that Cape Lilac are a known food source for Black Cockatoos in the City and subsequently have a role to play in this landscape.
11.	4.4.2 Fauna and Habitat	Quenda are known to co-habitat in the this area with a high likelihood that a significant population of quenda occurs outside the higher quality remnant vegetation. It is recommend to undedrtake additional surveys to better understand the population of quenda and measures should be put in place at structure plan stage to ensure their population is not detrimentally impacted.
12.	4.4.2 Fauna and Habitat	An assessment of the Rainbow Bee Eater population should be conducted as they are known to nest in bare open sandy paddocks as well as within remnant bushland. The remnant bushland proposed to be retained should be assessed as to whether it is a suitable soil type for Rainbow Bee Eater nesting requirements. If not, a proportion of the appropriate landscape/soil unity should be retained and incorporated into the ecological landscape design.
13.	4.5 Conservation Areas - Bush Forever (State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region)	It is stated that Bushforever sites are within 100m (site 387) and 50m (site 320) of the subject site. Attempts should be made to best link the areas between these sites and the subject site through ecological linkages.
14.	4.10 Integrating Biodiversity Measures – City of Kalamunda Draft Local Biodiversity Strategy	It is important that the remnant areas of high ecological value are not only retained but buffered with suitable landuses that increase the capacity of the remnants to be resilient to the impacts of the altered landscape. Analysis to determine the optimum size of the remnants including the buffers should be undertaken to ensure the remnant areas will not degrade over time, be manageable by the City without large amount of management inputs and will be suitable to contain and support populations of critical flora and fauna.



15.	4.10 Integrating Biodiversity Measures – City of Kalamunda Draft Local Biodiversity Strategy	The tree retention plan should provide details of all trees, not just those greater than 300mm DBH (diameter at breast height). Trees currently less than 300mmDBH are established and will, in time, become trees greater than 300mmDBH. A comprehensive plan on retention, buffering and connection and rehabilitation of important linkages should be undertaken as part of the structure planning process. It is important to recognise these features first and best attempt to integrate them as part of the broader urban design process.
16.	5.1 Heritage	<i>'DPLH 4342 Brentwood Road Quarry is listed on the Register of Aboriginal Sites as an artefact scatter and quarry with a reliable location. The site was relocated and recorded to a site identification level...'</i> Should the above state be reallocated rather than relocated?
17.	6. Design Considerations	Point 2 states <i>'retain existing areas of good quality vegetation wherever practical.'</i> Wherever practicable should be removed, as there should be a better attempt to retain good vegetation than just where it is 'practical'.
18.	6.1 Key Design Principles	Assessment of all trees on site should be undertaken. Trees valued as worthy of retention should be identified at structure planning stage and best attempts should be made to design around them. As mentioned in the point above, this should be all trees and not just those >300mmDBH.
19.	6.1 Key Design Principles	Supplemental Street Tree planting should consider the biodiversity and ecosystem benefits of the species as well as amenity value of trees planted. Local native species should be used in preference of other species.
20.	6.1 Key Design Principles (Unique Public Open Space Design)	Landscape design should enhance the "gateway to the Perth Hills" and not detract from the visual amenity people have when entering the Perth Hills. Detrimental visual amenity could detract from tourism.
21.	9.0 Coordination of Local and Region Scheme Amendments	The City notes that in the report it is recommended that the City recommend that a concurrent rezoning of the Local Planning Scheme No. 3 (LPS3) to a development zone is undertaken. The City at this preliminary stage reserves it's right to make comment on this recommendation until the MRS Amendment is formally initiated and formally advertised.
22.	10.0 Structure Plan and Implementation Provisions	Ecological assessment and planning to determine optimum size for 'conservation' areas should be undertaken to ensure areas are placed in the Nature POS areas.
23.	10.0 Structure Plan and	Tree retention plan should assess all trees and not just those less than 300mmDBH.



	Implementation Provisions	
24.	10.0 Structure Plan and Implementation Provisions	The City supports the structure plan and implementation provisions as identified in this section of the report with consideration of the points provided in this submission. The City also recommends that the Crystal Brook Concept Plan implementation strategies, items for further investigation and technical considerations are properly addressed. This is further outlined in the Crystal Brook Concept Plan section of this submission.
25.	DWMS Appendix A. Water balance	Comment references section 4.4 but this section does not cover water balance.
26.	TIA (Crystal Brook Road)	TIA Crystal Brook Road at eastern end. Shows 2031 total traffic nearing/exceeding capacity, with 2000/7100 being from the development. The intersection of Crystal Brook Road and Welshpool Road East (eastern) should be modelled for performance. Noting that it is likely that Crystal Brook Road east of Kelvin would have to remain in the same format due to site constraints, as would the intersection. Therefore, the forecast mid-block volume may need to have a maximum capacity applied to it, based on meeting a target service level of the intersection. The implication for the MRS amendment (and structure plan etc) is there needs to be a redistribution of traffic in the network.

2. Assessment Against Relevant Strategies and Policies

2.1 Northeast Sub Regional Planning Framework (The Framework)

The site is identified as Urban Expansion under the State’s Northeast Subregional Planning Framework. The proposed MRS Urban zoning can be considered within the Framework’s Urban Expansion designation.

The Framework states that Urban Expansion Areas constitutes a townsite expansion or represent a consolidation and ‘rounding off’ of existing urban areas. Further detailed planning is required for Urban Expansion/Investigation areas prior to consideration for any rezoning under the MRS and before development can occur including, but not limited to, investigations regarding protection of significant environmental attributes, basic raw materials, water resources, bushfire risk, servicing, community and social infrastructure, movement networks and employment. These areas may contain significant environmental attributes and further planning for these sites will need to prioritise avoidance and/or protection of the environmental values. Minor refinement of expansion or investigation area boundaries may be required to accommodate more detailed future planning.



The City is comfortable that the MRS Amendment addresses the Framework requirements for Urban Expansion at stage of the planning process and future structure planning and implementation will need to comprehensively address those requirements.

The below image identifies the actions required for Urban Expansion Areas. It is noted that an MRS Amendment is one of those key actions required. The area is also identified as an Investigation Area under the City's Local Housing Strategy 2021 and Local Planning Strategy 2010 which achieves the Local Planning Strategy action. Within the actions is the requirement for a District Structure Plan (DSP) which would generally be undertaken before or concurrently with a MRS Amendment. It is noted that this hasn't been done, however the City's is comfortable with bypassing the DSP and going to straight to a Local Structure Plan/s (LSP) as long as the LSP/s address the broader area in consideration of environmental matters, infrastructure delivery, amenity impacts, traffic impacts, noise impacts, traffic, cycling and pedestrian networks and interface treatments. The concurrent rezoning of the City's LPS3 to a development zone will be considered at the formal initiation and formal advertising of the MRS Amendment.

It is also noted that the Crystal Brook Concept Plan provides broad overarching development principles and implementation strategies not dissimilar to the role of a DSP and that those matters can be carried through at a LSP phase.

Strategic direction/priority	Actions	By whom
Urban	Structure planning	WAPC Local government
Urban deferred	Lifting of urban deferment in the region scheme	WAPC
	Structure planning	WAPC Local government
Urban Expansion and Investigation areas	District structure plans (where appropriate), generally prior to region scheme zoning	WAPC Local government
	Relevant investigations (for investigation areas)	WAPC Various
	Region scheme amendments	WAPC
	Local planning strategy/ scheme amendments	WAPC Local government
Urban Expansion and Investigation areas based on 15 dwelling units per gross hectare of urban zoned land, where appropriate	Local planning strategy/ scheme amendments	WAPC Local government
	Structure planning	

The Framework identifies the site as a medium-long term project for 2022+. The proposed MRS Amendment would be consistent with this timeframe as it is assumed that the assessment and approval of the MRS and LPS3 Amendments and the Local Structure Plan/s would take a number of years taking the project past 2022.



2.2 Local Planning Strategy 2010

The site is identified as Urban Investigation Area in the City's Local Planning Strategy 2020 (LPS2010). The proposed Urban MRS zoning can be consideration within the Urban Investigation designation of LPS2010. The LPS10 identifies the following key matters that should be addressed (but not limited to):

- Bushfire risk.
- Transport/movement networks.
- Infrastructure/servicing.
- Environmental and landscape impacts.
- Urban water management.

The City's notes that these items have been addressed for the purposes of the proposed MRS Amendment in the supporting reports and will be further addressed in the future structure planning stages.

2.3 Local Housing Strategy 2021

The site is identified as a WAPC Urban Expansion and Investigation Area under the City's Local Housing Strategy 2021 (LHS). The proposed Urban MRS zoning can be considered within the LHS designation.

The LHS estimates between 510 and 2725 additional dwellings and up to 7085 additional persons for the Wattle Grove South area. The Traffic Impact Assessment (TIA) for the MRS Amendment indicates approximately 1300 dwellings at this early planning phase which would be consistent with the LHS estimate.

The LHS states that the objective for this area identified in the Framework is to retain landscape characteristics and vistas, retain ecological linkages, manage bushfire risk and investigate service requirements. It is noted that although some of these elements are addressed in the proposed MRS Amendment design considerations and proposed as project commitments, structure planning and implementation is required to properly address this objective.

2.4 Crystal Brook Concept Plan

The Crystal Brook Concept Plan is a strategic blueprint for future planning and growth of the Wattle Grove South Urban Investigation Area ('Crystal Brook') towards the year 2050. It establishes the overarching design principles and planning strategies necessary to meet the progressive aspirations of landowners.

At the 24 November 2020 Ordinary Council Meeting the Council considered the draft Concept Plan and Report and a schedule of proposed modifications and resolved to:
That Council:



1. NOTE the outcomes of community engagement and public advertising and acknowledge that there are a range of views on the future planning for the project area.
2. NOTE the outcomes of the Ecological Report.
3. REQUEST the Chief Executive Officer to make modifications to the Concept Plan and Report in accordance with Attachment 1 and, in addition, include information regarding Voluntary Conservation Covenants on private land in accordance with Clause 11.1.3 of the City of Kalamunda – Local Biodiversity Strategy (2008), publish the modified document on the City's website and inform all landowners within the project area once completed.
4. NOTE the strategic outcomes of the Concept Plan and Report, as proposed to be modified.
5. CEASE further planning for the project as outlined in Option 2 of the Council Report.

As stated in Council's resolution, the City has ceased planning for the area. This does not however preclude landowners or others from undertaking the planning of the area as done in this situation.

The Crystal Brook Concept Plan identifies the site as 'Urban Landscape'.

It is noted that the proposed Urban MRS boundaries do not align with the 'Urban Landscape' boundaries of the Crystal Brook Concept Plan. It is recommended that the Urban boundaries of the MRS Amendment align with the Urban Landscape boundaries of the Crystal Brook Concept Plan in so far as they bound Crystal Brook Road and the local government boundary with the City of Gosnells. This area is illustrated in red in the image below.



Key reasons for requesting this are as follows:

1. Ensures a coordinated planning outcome and technical analysis is undertaken over a coordinated area.
2. Provides a logical boundary utilising Crystal Brook Road and Victoria Road.
3. Aligns with the Urban Landscape designation in the Crystal Brook Concept Plan.
4. Includes areas of environmental value that need to be planned for and ultimately managed.

Urban Landscape: Identifies areas where environmental and servicing constraints may be present but on assessment does not, at this high level of analysis, impede development, subject to meeting the strategic objectives of the concept plan and ensuring sensitive interface treatments between land use typologies. These areas are generally suited to lots in the order of 2000sqm due to current servicing constraints. Smaller lot sizes could be explored subject to the availability of services. Captures an array of uses (including but not limited to):

- Residential (Starting from R2)
- Commercial (Any commercial land to be commensurate to the density of the population, to be defined at future detailed planning, subject to community consultation and subject to retail needs and sustainability assessment).
- Not to include industrial.



The structure planning of the area will need to ensure that the planning and implementation of the area align with the Concept Plan’s ‘Urban Landscape’ typology.

Technical Considerations:

The Concept Plan lists the below technical considerations to be considered at more detailed planning stages. Each stage of the planning process including the proposed MRS Amendment should outline whether these technical considerations are being addressed and how. If they are to be addressed at a later planning stage (such as structure plan stage), then that should be stated in the supporting planning report. This could be undertaken in a table style format similar to what the City has provided below. The City has assessed how these technical considerations have been addressed in the proposed MRS Amendment and has outlined how they should be addressed where the information has not been provided.

Technical Consideration	How has it been addressed in proposed MRS Amendment?
1. Primary vehicle entries require modified intersection treatments to address traffic movement issues, subject to further detailed investigations at a later date.	Addressed in the TIA at this MRS stage with structure planning to further detail how intersections will be addressed.
2. Development may not be possible on constrained land.	While being utilised for these purposes, the turf farm, poultry farms, dog kennels and environmentally constrained land may provide constraints to development. These matters have been highlighted and addressed in the context of the MRS Amendment and to be further detailed and management measures outlined at the structure planning phase.
3. A suitably sized non-residential centre (not industrial) commensurate to the density of the population to be defined at future detailed planning and subject to needs assessment. Preferred location should this occur fronting Brentwood Road or Welshpool Road East	No information provided. This should be addressed at structure planning stage and be supported by appropriate analysis.
4. Lot sizes to transition away from special rural areas with sizing subject to future planning and consideration of sewer servicing feasibility.	Information on lot sizes not provided. This should be addressed at Structure Planning stage.
5. New road linkages to improve connectivity and precinct permeability	The MRS Amendment Report states that planning for the area will achieve a



to be provided in agreed locations subject to future planning.	connected community including walking trails and paths. Further information should be provided at Structure Planning stage.
6. Opportunity for Public Open Space to provide active recreation amenity. POS incorporates areas of higher value conservation areas.	MRS Amendment Report makes a project commitment to capture high retention value vegetation in public open space which is supported. The MRS Amendment Report also states that landscape linkages will be maximised. Further information should be provided at structure planning stage.
7. Potential need for Primary School subject to ultimate residential densities and further Department of Education liaison.	No information provided. This should be addressed at structure planning stage.
8. Protection of high retention value vegetation clusters in POS or within private ownership to be investigated further.	MRS Amendment Report makes a project commitment to capture high retention value vegetation in public open space which is supported and maximise tree canopy. This should be formalised in the structure planning stage and implemented by the developer.
9. Interface and buffer with Gosnells Rural-Residential precinct to be further investigated.	No information provided. This should be addressed at structure planning stage.
10. Preliminary City of Gosnells concept for operations centre and public open space at Kelvin Road may help meet regional active space demand.	This is noted in the MRS Amendment Report.
11. Perth Airport Increased Noise. All developments are insulated appropriately in accordance with Perth Airport advice.	The MRS Amendment Report addressed the ANEF contours but does not consider projected future frequency of noise events above 65 decibels. Further comments on this are detailed in section 2.4 of this submission under the 'Agency and Stakeholder Submissions on the Draft Crystal Brook Concept Plan' heading. This should be considered at Structure Planning stage how it will be addressed.
12. Voluntary conservation covenants enable private landholders to protect and manage their bushland not only through their own ownership of their property but also to ensure future owners also protect and manage the	This is an individual landowner consideration.



<p>conservation values on the property in line with their vision for their land. The basis is a covenant, a legally binding document that has provisions restricting activities that might threaten the land's conservation values, voluntarily negotiated between the owner and a covenanting body that is accredited with the Australian Government as providing best practice services. In Western Australia, the two providers are the National Trust of Australia (WA) and Department of Biodiversity, Conservation and Attractions.</p>	
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Further Investigation

The Concept Plan identifies a number of key issues that require further investigation and detailed planning which are detailed below. Each stage of the planning process including the proposed MRS Amendment should outline whether these items are being addressed and how. If they are to be addressed at a later planning stage (such as structure plan stage), then that should be stated in the supporting planning report. This could be undertaken in a table style format similar to what the City has provided below. The City has assessed how these items have been addressed in the proposed MRS Amendment and has outlined how they should be addressed where the information has not been provided.

Item for Further Investigation	How has it been addressed in proposed MRS Amendment?
<p>Sustainability Requirements The Concept Plan and supporting strategies encourage low carbon living and off-grid/limited servicing. Specific implementation mechanisms and development standards to be determined and feasibility considered.</p>	<p>No information provided. This should be addressed at structure planning stage.</p>
<p>Servicing Methodology The Plan assumes sustainable on-lot sewer disposal within lots no smaller than 2,000sqm in order to suitably meet servicing needs without need for deep sewer. Detailed feasibility assessment required.</p>	<p>A servicing report has been provided to demonstrate how the site will be connected to reticulated sewer.</p>
<p>Residential Densities and Lot Size The Plan assumes minimum 2,000sqm lots. Feasibility and urban impacts of this</p>	<p>A servicing report has been provided to demonstrate how the site will be connected to reticulated sewer. Lot sizes</p>



<p>approach to be more fully considered through detailed planning with ultimate lot sizes and density coding to be reviewed through future planning subject to sewer availability.</p>	<p>should be addressed at the structure planning stage.</p>
<p>Public Open Space Provision Public Open Space provision to be considered as part of future detailed planning. It will be important any POS provided allows for a variety of POS types including active, passive and environmental.</p>	<p>MRS Amendment Report makes a project commitment to capture high retention value vegetation in public open space which is supported. The MRS Amendment Report also states that landscape linkages will be maximised. Further information should be provided at structure planning stage. The requirements of the City's Local Planning Policy 32 Public Open Space should be addressed.</p>
<p>Protection of significant environmental values The Concept Plan identifies significant environmental values. Need for these areas to be vested as public open space to be further considered and alternatives explored during future planning. It may be deemed during future planning that environmental values can be retained in private ownership.</p>	<p>MRS Amendment Report makes a project commitment to capture high retention value vegetation in public open space which is supported and maximise tree canopy. This should be formalised in the structure planning stage and implemented by the developer.</p>
<p>School Site and Other Services Community need for public services, particularly a Primary School site, to be further considered through future planning. Feedback from the Department of Education has indicated that the identification of a school site/s in the precinct may be required due to population growth and pressures on surrounding schools.</p>	<p>No information provided. This should be addressed at structure planning stage.</p>
<p>Governance and Implementation Suitable planning controls and design guidance to be developed and implemented through appropriate statutory planning instrument/s.</p>	<p>Design consideration and planning control for dealing with sensitive interfaces and constraints is cited on in the MRS Amendment report.</p> <p>The report states the following for design considerations: <i>'The future structure planning design for the 'Urban' zone will be progressed over the coming months. Broadly the project design ethos is to:</i></p>



	<ul style="list-style-type: none"> • <i>Retain a 'rural suburban' feel to streetscapes and open space which captures the essence of the wider setting.</i> • <i>Retain existing areas of good quality vegetation wherever practical enhancing visual connectivity between identified tree groups of significance.</i> • <i>Provide visual connections to conservation areas and features of interest that assist in orientation and legibility.</i> • <i>Integrate innovative sustainable urban drainage and use for passive irrigation of the public realm setting the benchmark for future development in the area.</i> • <i>Create landscape linkages, recreational nodes and circuits of pedestrian routes within the site and promote connections to the surrounding landscape.</i> • <i>Encourage community ownership and sense of pride through the creation of diverse urban landscapes that reflect the site's unique characteristics.'</i> <p>Further detail should be provided at structure planning stage.</p>
<p>Non-residential development A suitably sized non-residential centre (not industrial) commensurate to the density of the population to be defined at future detailed planning and subject to needs assessment. Preferred location should this occur fronting Brentwood Road or Welshpool Road East.</p>	<p>No information provided. This should be addressed at Structure Planning stage.</p>
<p>Bushfire Risk A non-standard approach to fire management will be required to facilitate vegetation retention while permitting densification and should be investigated at a precinct level.</p>	<p>A Bushfire Management Plan has been provided. A BMP which considers the detail of a structure plan is to be provided at the structure planning stage.</p>
<p>Structure Planning and Infrastructure Funding Future planning may require the preparation of a structure plan to coordinate the broader development of the area and may also require the preparation of other technical studies and</p>	<p>The need for Structure Planning and the consideration of how infrastructure is funded is addressed in the MRS Amendment Report.</p>



<p>plans which address the technical considerations identified in further investigation. Future planning may also require the preparation of an infrastructure contribution plan to coordinate the funding and delivery of common public infrastructure to the area.</p>	
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Implementation Strategies

The Concept Plan recommends a number of implementation strategies during detailed planning and delivery of infrastructure, environmental assets, facilities and the community. It is recommended that the majority of these implementation strategies are implemented where relevant and achievable to align with the community’s aspirations and values for the area. Each stage of the planning process including the proposed MRS Amendment should outline whether these strategies are being implemented and how. If they are to be addressed at a later planning stage (such as structure plan stage), then that should be stated in the supporting planning report. This could be undertaken in a table style format.

It is noted that the below design ethos is outlined in the MRS Amendment Report in addition to key design principles which makes some attempt to address some of the implementation strategies.

Project Design Ethos:

- *Retain a ‘rural suburban’ feel to streetscapes and open space which captures the essence of the wider setting.*
- *Retain existing areas of good quality vegetation wherever practical enhancing visual connectivity between identified tree groups of significance.*
- *Provide visual connections to conservation areas and features of interest that assist in orientation and legibility.*
- *Integrate innovative sustainable urban drainage and use for passive irrigation of the public realm setting the benchmark for future development in the area.*
- *Create landscape linkages, recreational nodes and circuits of pedestrian routes within the site and promote connections to the surrounding landscape.*
- *Encourage community ownership and sense of pride through the creation of diverse urban landscapes that reflect the site’s unique characteristics.*



The Implementation Strategies are detailed below.

1 Crystal Brook is a Living Landscape

POSSIBLE STRATEGY	DESCRIPTION
a) Minimum Lot Sizes and Ranges	Set a minimum lot size based on engineering/servicing requirements, precedent in area and tree retention feasibility (i.e. 2,000sqm) with specified ranges set in certain areas to ensure diversity.
b) Grouped Housing	In limited areas, explore opportunity for eco-village or similar typologies which group development within a smaller area to maximise the land reserved rural or ecological purposes.
c) Tree Canopy Protection Standards	Establish a formal planning requirement to survey, assess and retain on site trees to strengthen protection of trees and limit clearing associated with development.
d) Tree Canopy Target	Set a minimum average tree canopy cover of 20% for areas that are developed in alignment with "Where Are All the Trees? - 2020 Vision - Greener Spaces, Better Places recommendations.
e) Rehabilitation Requirements Incentives	Require that a minimum percentage of a site be replanted with native species as part of any development to actively improve local biodiversity.
f) Protection of Crystal Brook	Ensure the Preservation of Crystal Brook Creek.
g) Public Space Creation for Conservation	Identify land to be formally conserved where Environmental Assessment shows Threatened Ecological Communities or Declared Rare Fauna
h) Voluntary Conservation Covenants	Landowners may wish to enter into Voluntary Conservation Covenants to conserve biodiversity values that exist on their property
i) Fauna Conservation/ Management Plan	Develop a plan to protect local wildlife with supporting strategies such as managing fencing and other barriers to allow bandicoots, reptiles and birds to move freely between vegetated areas.
j) Street verge enhancement	Make use of public verges to provide infill tree planting and native landscaping to support biodiversity.



2 Crystal Brook is a Tranquil Escape

POSSIBLE STRATEGY	DESCRIPTION
a) Rural Character and Aesthetics	Ensure subdivision and construction of new housing is managed in a low impact way which maintains a rural-style, supported by detailed design guidelines that reflect an Australian vernacular. For non-residential development, Set clear design guidelines and define permissible activities to ensure integration with area.
b) Rural Business Guidelines	Continue to allow boutique rural businesses but provide specific guidance potentially including an approved list of acceptable activities and strong amenity and design quality controls.
c) Home gardens and self-production	Promote self-sufficiency by encouraging new homes to provide for urban agriculture, vegetable gardens, orcharding or other productive rural pursuits at a small scale.
d) Tourism Opportunities	Identify tourism, accommodation and recreational activities consistent with the area's rural character that could promote a 'foothills' tourism experience and create economic development opportunities
e) Sensitive street design	Ensure new streets are only constructed where absolutely necessary and adopt a low-impact design ethos. In other cases, informal strata access points can be used instead of roads.
f) Traffic Diversion	Explore alternative traffic management measures to reduce amenity impacts of heavy traffic on Crystal Brook Road.

3 Crystal Brook Grows Naturally

POSSIBLE STRATEGY	DESCRIPTION
a) No traditional Subdivision Plan	Rather than usual practice of preparing an overarching subdivision pattern crossing over properties that all landowners must follow, manage development within a flexible framework that focuses on key minimum lot size ranges and sustainability standards.
b) Site-based planning process	In lieu of an overarching design masterplan, promote site-specific planning by landowners within a wider guiding framework to manage change on a per-lot basis that reduces impacts on neighbours.
c) Green setbacks and interfaces	Adopt a principle of independent lot development with green buffers at shared boundaries to avoid impacts to adjoining landowners as an alternative to conventional planning.
d) Reward responsible land stewardship	Investigate ways of rewarding people for maintaining large lots in good condition and set stricter requirements for smaller lots with less onerous standards for large properties.
e) Promote landowner-led change	Support and equip landowners to be able to progress more sensitive development opportunities on their own land if they wish without requiring the involvement of large developers.
f) Avoid targets and timelines	Do not establish minimum densities, growth targets or timelines that would compel growth. Focus on ensuring growth is sustainable and reflects the desire of landowners.



4 Crystal Brook is Self-Sufficient

POSSIBLE STRATEGY	DESCRIPTION
a) Housing Construction Standards	Establish high standards for housing construction and thermal performance to reduce carbon impact in construction and ongoing operation.
b) Rural Hub	Identify a suitable location where existing and related rural activities can be transitioned to a higher amenity and community-focused service hub to reduce vehicle trips, promote walking and cycling and reduce food miles and carbon emissions while preserving the amenity of surrounding areas.
c) Energy Generation	Promote opportunities for off grid solar and wind generation and storage within individual properties and at a wider collective scale to minimise use of grid power.
d) Wastewater Management	Work on the presumption that deep sewer will not be provided some areas and explore alternative sustainable septic/filtration systems with supporting guidelines and standards.
e) Water Capture and Reuse	Establish minimum standards for rainwater tanks to meet resident needs and establish variable standards for water recycling as well as encouraging blackwater filtration.
f) Sustainable Transport	Integrate cycling paths along key roads and connecting to surrounding areas to promote cycling-based local trips, provide future-proofing for electric cars and promote improved public transport.

5 Crystal Brook Values its Community

POSSIBLE STRATEGY	DESCRIPTION
a) Resident Amenity Principle	Work to a principle of limited disturbance of surrounding properties when considering future land use decisions to protect existing lifestyle/amenity and manage the reality of landowners' differing intentions.
b) Landowner Choice	Allow individual landowners to determine the level of change they want on their property (within agreed principles) and encourage neighbour collaboration.
c) Consultative Decision-making	Promote means of community collaboration to ensure high level of engagement with any future planning of the area.
d) Development Approval Presumption	Presume that most proposals for development will require public advertising and individual assessment to ensure standards are being met and provide the community with an opportunity to have a say in the process.
e) Local Placemaking	Establish quality-of-life supporting community facilities such as an arts studio, mens' shed or communal park with pizza oven. Encourage the installation of artworks by local artists within private and public land.

Agency and Stakeholder Submissions on the Draft Crystal Brook Concept Plan

Perth Airport

Perth Airport provided a submission to the City's draft Crystal Brook Concept Plan during advertising. Perth Airport noted that the site is not within an ANEF contour, however an assessment of the project area for the future with the New Runway in place using the National Airports Safeguarding Framework (NASF) recognised the area will experience up to 100 aircraft noise events above 65 decibels across an average day. Noise at this level is disruptive to a conversation, even inside a dwelling and will be unacceptable to most people.



Guidelines used by NASF state the benchmark of 50 noise events to be the point where the frequency and level of aircraft noise events should be considered as impacting planning decisions. This 50-event trigger is met (and exceeded) in this area. It is worth noting that this area will receive a significant number of additional aircraft noise events at a level less than 65 decibels, and these noise events may also cause annoyance to some people.

An additional NASF recognised noise metric is the N60, which shows the number of events in excess of 60 decibels that can be expected over an average night (11pm-6am). NASF uses the benchmark of 6 noise events to be the point where the frequency and level of aircraft noise events should be considered as impacting planning decisions. This trigger is met (and exceeded) in the subject site.

As part of their submission, Perth Airport recommended that insulation to mitigate these noise impacts be considered to be made mandatory. The City recommends that this recommendation is considered through the structure planning phase.

Department of Education

The Department of Education (DoE) provided a submission that stated the additional population generated in the area plus existing pressures on existing schools may require up to an additional two primary schools and one high school.

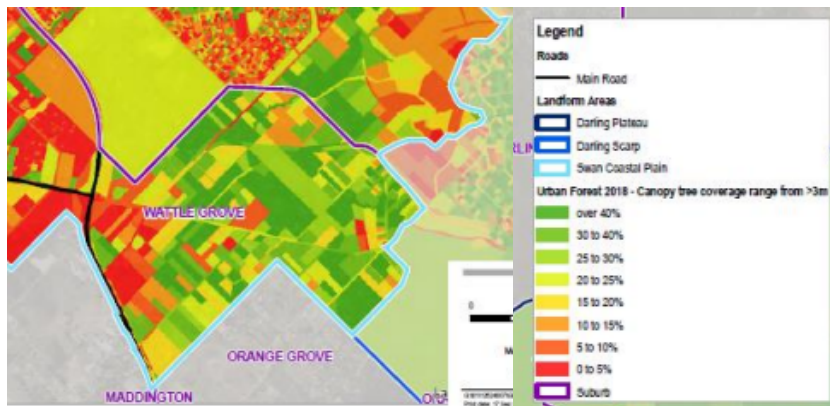
The City recommends that the applicant liaise with DoE on school requirements for the site and acknowledges that this will be further detailed at structure planning stage.

Other Submissions

All submissions received during the advertising period of the Crystal Brook Concept Plan should be taken into consideration during each planning phase of this project. Submissions on the Concept Plan can be viewed in the following link - [Crystal Brook Concept Plan Submissions](#)

2.5 Draft Urban Forest Strategy 2020

The City's Draft Urban Forest Strategy (UFS) targets to retain at least 20% canopy cover in areas earmarked for, but yet to undergo, urban development. The UFS identifies the site to have a mixture of areas with very low canopy cover (under 20%) and areas which exceed 20%.



It is noted that the MRS Amendment Report states that a key objective of the project is to maximise tree retention within new public open space areas, streetscapes and larger lots and introduce substantial street tree planting to achieve significant tree canopy areas and local amenity as the site develops. Substantial tree planting shall be undertaken as part of the future redevelopment of the existing and proposed 'Urban' zone to achieve significant tree canopy areas as the site develops and which will result in an increase to the current area of tree canopy.

The City is supportive of this objective and recommends that a minimum of 20% canopy cover is committed to and achieved through structure planning and implementation during the project's development. This should be achieved through the application of retention of trees on private property (City's Environmental Land Use Planning Strategy (ELUPS)) and streetscapes as per the UFS to ensure a balanced approach between public and private land.

2.6 Local Biodiversity Strategy 2008 and Draft Local Biodiversity Strategy 2020

The City's Local Biodiversity Strategy (LBS 2008) has the following action in regard to the natural environment in Urban Areas:

Protect existing natural areas in new urban areas by:

- *Conducting full ecological assessment/s prior to structure planning of new developments to protect natural areas in public open space contributions;*
- *Ensuring natural areas are protected as development the new areas takes place, i.e. by fencing during subdivision so the area is not cleared, undertaking spot checks to ensure builders rubble etc is not dumped in the reserve;*
- *Protecting valuable ecological areas by requiring ecological assessment prior to development; and Promoting tax concessions to developers for gifting of land.*

The City's Draft Local Biodiversity Strategy (2020) has the following objectives:



- *To increase the protection status of priority natural areas in the City, including on local government managed or*
- *owned lands, and on private land;*
- *To appropriately manage local natural areas to reduce threats, considering the identified local biodiversity*
- *conservation priorities;*
- *To increase the viability and resilience of natural areas by establishing buffers and ecological linkages; considering*
- *the impacts of climate change;*
- *To integrate biodiversity considerations across all areas of City's business and operations;*
- *To achieve long term community engagement in biodiversity management.*

The MRS Amendment Report responds to the actions and objectives of LBS 2008 and LBS 2020 by stating that:

The majority of the subject site is not identified in the draft strategy as having a high Natural Area Prioritisation rating, there are two discrete pockets of land which are identified as having a 20-23.5 and 24-27.5 rating (the higher the number of characteristics known within an area, the higher its relative conservation priority – potentially up to the range of 38-42.5). While this rating reflects a medium biodiversity value rating it still highlights vegetation with local biodiversity value. These areas will be retained in Conservation Public Open Space areas within public ownership for preservation and management by the City of Kalamunda as part of the structure planning and subdivision design stages of the project. As outlined in Section 10 of this report, Local Structure Plan provisions will provide a statutory mechanism to ensure that these areas are identified and vested in the City for conservation management.

Stated within the MRS Amendment Report is the following project commitment:

Prior to subdivision or development of Lot 210 Crystal Brook Road and Lots 2 and 254 Victoria Road, Wattle Grove a Vegetation and Fauna Management Plan(s) is required to be prepared and implemented for the applicable conservation areas. The Vegetation and Fauna Management Plan(s) is to address:

- *Fencing and any other measures required to limit public access;*
- *Initial rehabilitation and weed control;*
- *Educational signage; and*
- *Requirements for ongoing environmental management and maintenance (including bushfire control)*

Preparation of a Tree Retention Plan, which details location, species, size and structural health of significant trees (>300 DBH) within the site proposed to be retained during subdivision works.

Preparation of a Tree Canopy Strategy that demonstrates that a minimum 20% tree canopy cover can be achieved and how this will be implemented within the rezoning area.



The City supports the commitment of the project to protect medium-high biodiversity rated vegetation in conservation public open space and implement a Flora and Fauna Management Plan(s) and it is the expectation that this commitment is fulfilled. The City recommends that the structure plan identifies networks of public open space which link biodiversity assets.



2.7 Local Planning Policy 28 – Delivery of State and Local Strategies Through the Preparation of Structure Plans (LPP28)

The City's LPP28 Appendix 1 identifies the information required to be submitted with a planning proposal. An assessment against the information requirements for MRS Amendments has been undertaken below.

Information Required / Tasks To Be Completed	Required - MRS Amendment	Provided?	Comment
Structure Planning			
District Structure Plan (DSP)	✓	X	<p>Bypassing the DSP and going straight to a LSP/s is acceptable as long as the LSP/s address the broader area in consideration of environmental matters, infrastructure delivery, amenity impacts, traffic impacts, noise impacts, traffic, cycling and pedestrian networks and interface treatments.</p> <p>It is also noted that the Crystal Brook Concept Plan provides broad overarching development principles and implementation strategies not dissimilar to the role of a DSP and that those matters can be carried through at a structure planning phase</p>
Local Structure Plan (LSP)			



Information Required / Tasks To Be Completed	Required - MRS Amendment	Provided?	Comment
Infrastructure Contributions			
Yields Analysis (Depending on context – population, dwellings, market)			
Land and Infrastructure Needs Assessment			
Development Contribution Plan (DCP)			
Engineering and Servicing			
Infrastructure and Servicing Strategy		✓	Servicing Report provided.
Transport Impact Assessment (TIA) (4)	✓	✓	TIA provided.
Geotechnical Investigations	✓	✓	Preliminary geotechnical investigations undertaken. Further detailed geotechnical investigation of the development site is to be undertaken to support the detailed engineering design phase of the development.
Parking Plan			
Loading, Servicing and Delivery Management Plan			
Water Management			
District Water Management Strategy (DWMS)	✓	✓	DWMS provided.
Local Water Management Strategy (LWMS)			



Information Required / Tasks To Be Completed	Required - MRS Amendment	Provided?	Comment
Groundwater Monitoring	✓	✓	Groundwater monitoring undertaken.
Surface Water Monitoring	✓	✓	Surface water monitoring undertaken.
Stormwater Management Plan			
Urban Water Management Plan			
Environment			
Environmental Assessment Report	✓	✓	It should be noted that the Flora, Vegetation and Fauna Surveys undertaken in Spring 2020 do not capture all properties in the project area. It is recommended further survey work is done in Spring 2021 to capture those properties that were not surveyed.
Flora and Vegetation Survey	✓	✓	It should be noted that the Flora, Vegetation and Fauna Surveys undertaken in Spring 2020 do not capture all properties in the project area. It is recommended further survey work is done in Spring 2021 to capture those properties that were not surveyed.



Information Required / Tasks To Be Completed	Required - MRS Amendment	Provided?	Comment
Fauna Survey	✓	✓	It should be noted that the Flora, Vegetation and Fauna Surveys undertaken in Spring 2020 do not capture all properties in the project area. It is recommended further survey work is done in Spring 2021 to capture those properties that were not surveyed.
Acid Sulphate Soils Investigations (5)			
Landscaping Strategy			
Landscaping Plan			
Public Open Space Plan (6)			
Environmental Management Plan / Strategy			
Noise Assessment (5)			
Contaminated Site Investigation (5)			
Bushfire			
Bushfire Management Plan (BMP) (7)	✓	✓	BMS provided.
Bushfire Management Statement (BMS) (7)			
Bushfire Attack Level Assessment (BAL)			
Evacuation Plan			
Economic			
Retail Needs Assessment (RNA) (8)			
Economic Development Strategy (5)			



Information Required / Tasks To Be Completed	Required - MRS Amendment	Provided?	Comment
Community			
Community Infrastructure Plan / Strategy (5)			
Design			
Design Guidelines (5)			
Sustainability			
Sustainability and Innovation Strategy (5)			
Heritage			
Aboriginal Heritage Assessment			
European Heritage Assessment			

(1) Often, a Metropolitan Region Scheme Amendment would be progressed in parallel with a District Structure Plan. (2) Often, a Local Planning Scheme Amendment would be progressed in parallel with a Local Structure Plan. (3) In accordance with State Planning Policy 4.2. Requirements for activity centres may depend on activity centre classification and locational characteristics. (4) Whether a TIA is required will depend on the scale of the proposal and locational attributes. (5) It may be deemed that the investigation/plan/strategy are not required depending on site characteristics/nature of proposal. (6) POS Plan may not be required if not being delivered by the applicant. (7) In accordance with the requirements of State Planning Policy 3.7. Whether a BMP or BMS is required will depend on the scale of the proposal and locational attributes. (8) In accordance with State Planning Policy 4.2. Requirement for RNA dependent on locational characteristics and scale of proposal.

During the subsequent planning stages including Local Planning Scheme Amendment and Local Structure Planning the requirements of Appendix 1 of [LPP28](#) are to be addressed.



2.8 Other Planning Instruments

The preparation of a structure plan/s should demonstrate particular attention to addressing the following planning policies:

1. Local Planning Policy 32 – Public Open Space
2. Local Planning Policy 24 – Development Contribution Arrangements
3. Local Planning Policy 25 – Interim Development Contribution Arrangements
4. Liveable Neighbourhoods
5. State Planning Policy 7.3 Residential Design Codes
6. State Planning Policy 3.6 Development Contributions for Infrastructure
7. State Planning Policy 3.7 Planning in Bushfire Prone Areas
8. State Planning Policy 4.2 Activity Centres for Perth and Peel
9. State Planning Policy 5.1 Land Use Planning in the Vicinity of Perth Airport
10. State Planning Policy 5.4 Road and Rail Noise
11. Development Control Policy 2.2 Residential Subdivision
12. Development Control Policy 2.3 Public Open Space in Residential Areas