

Response to Submissions Received
Local Housing Strategy

Submitter No.	Nature of Submission	City of Kalamunda Response
<p>1.</p> <p>Department of Planning, Lands & Heritage</p>	<p>We've undertaken a broad review of the LHS and provide the following feedback for your consideration:</p> <ul style="list-style-type: none"> • The Department's comments are provided at officer level only and do not fetter the WAPC's consideration of the City's Local Planning Strategy at a future date; • The WAPC does not have a role in considering or endorsing 'sub-strategies' such a local housing strategy. Sub-strategies are not recommended for inclusion in a local planning strategy as an appendix, rather, the recommendations should be extracted for consideration as actions, and relevant information included as background information in support of any actions. • The proposed strategies and actions are generally sound, and the inclusion of implementation timeframes is supported. Where possible, actions and a spatial represented on a local planning strategy map are encouraged. • Normalisation and revocation of superfluous planning instruments is appropriate and supports a contemporary and streamlined local planning framework; • The preparation of any studies or discussion papers are encouraged to be undertaken as early as possible in the planning process as this may have implications for actions or recommendations of the Local Planning Strategy; • The local housing strategy recognises the dwelling targets as identified under Perth and Peel @ 3.5 million, however, the local housing strategy's response to the principles of urban consolidation does not appear to be directly addressed. The City is encouraged to look at this further, and ensure these aspects are contemplated in conjunction with one another; • Relevant state and regional planning policy is referenced, including a summary of the policy, however, these sections would benefit from further discussion regarding the direct implications for the local government area; • The investigation areas identified as WAPC Planning Investigation Area; WAPC Urban Expansion Area and WAPC Urban Investigation Area, should be identical in size to that delineated in the South Metropolitan Peel Sub-regional Planning Framework. In this regard it is noted that the Wattle Grove South investigation area is not identical to the WAPC Urban Expansion and Urban Investigation Area in the South Metropolitan Peel Sub-regional Planning Framework (March 2018). 	<p>It is noted the Local Housing Strategy (LHS) is a background document which feeds into the Local Planning Strategy. The Local Planning Strategy is the key statutory planning document which informs the Local Planning Scheme.</p> <p>General support for the strategies and actions with indicative timeframes is noted.</p> <p>Support for streamlining the planning system through normalisation of old structure plans is noted.</p> <p>The recommendation that discussion papers and studies be completed prior to preparation of the Local Planning Strategy is noted. This position is supported to the extent it can be achieved in the available timeframe.</p> <p>Dwelling targets have been addressed. The principles of urban consolidation are considered to have been met through the Dual Density rezoning process within 800m walking distance to activity centres and urban development close to Forrestfield North/High Wycombe Train Station. As the City does not have access to the same level of public transport options as other inner metropolitan local governments this approach is considered appropriate to avoid further dependence on private vehicles. This can be re-evaluated once development in these areas have been substantially completed.</p> <p>Policy section modified to better reflect local area context.</p> <p>Noted that Wattle Grove South boundary is not identical to the boundary identified in the North-East Sub-regional Planning Framework. This is because Wattle Grove has already undergone significant technical studies and community consultation, and the amended boundary reflects and responds to the local characteristics of the area. The WAPC will have ultimate determination over the Local Planning Strategy and any Local Planning Scheme Amendment in this area.</p> <p>It is noted DPLH objects to including Heidelberg Park and Halleendale Road investigation areas.</p> <p>a) Heidelberg Park – was based on an agreement with DPLH. The State Government is now the primary project manager for this site therefore the City still supports inclusion of this investigation area.</p>

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	<ul style="list-style-type: none"> There is no fundamental objection to the City's investigation areas that are within the urban footprint of the Metropolitan Region Scheme (MRS) as the South Metropolitan Peel Sub-regional Planning Framework already identifies the land as Urban or Urban deferred. The exceptions are: <ul style="list-style-type: none"> Heidelberg Park investigation area, Carmel, which is a Parks and Recreation Reserve under the MRS. Investigating this area for alternate land uses may be appropriate; and Halleendale Road investigation area, Walliston is zoned Rural and Urban in the MRS. The area is zoned Rural Agriculture, Special Rural and Residential under LPS3. Investigating the Rural Agriculture and Special Rural zoned areas for alternate urban land uses is contrary to the sub-regional planning framework which retains the land as Rural and Rural Residential. It also raises the question why similarly located rural/rural residential land is not also being investigated. The Foothills Investigation Area was included in the WAPC approved Local Planning Strategy (2013), however it was not included in either the May 2015 Draft North-East Sub-regional Planning Framework or the March 2018 Final North-East Sub-regional Planning Framework. The area was excluded from investigation for similar reasons to those outlined in the draft Local Housing Strategy, including the availability of utilities / servicing, protection of environmental attributes and bushfire risk. It would also represent a significant departure from the Foothills Structure Plan (1992) which generally sought to protect the rural landscape in the area. 	<p>b) Halleendale Road – The City would not usually investigate rural areas unless identified in the NE Framework or other strategic planning documentation, however the Halleendale area requires an orderly and proper planning approach to coordinate POS, residential development and rural development to avoid land conflicts. Similarly located rural-residential land is not subject to the same urban development pressures as the Halleendale investigation area resulting from a patchwork of spot rezoning of R5 adjacent to rural agriculture zones. The future of this area will need to be further confirmed with the DPLH/WAPC through development of the Local Planning Strategy and in consultation with the community.</p> <p>It is noted the DPLH seeks to protect the rural landscape in the Foothills area. The City, generally, supports this position.</p>
2.	<p>Aged Care</p> <p>Thank you for the opportunity to comment on the City of Kalamunda's <i>2020 -2025 Draft Housing Strategy</i> (LHS).</p> <p>There are three main reasons for submitting comments on this Strategy. These are largely directed at aged care developments.</p> <ul style="list-style-type: none"> First, to strongly support the City's objectives of creating adaptable, diverse and innovative housing options across all age groups in viable and sustainable communities; Second, to draw attention to a number of constraints that may adversely impact on projections for aged-care and retirement facilities within the City, and Third, to make a strong plea for the protection of the City's natural environment in the face of future aged-care developments. <p style="text-align: center;">***</p> <p>1. Roshana Pty Ltd</p>	<p>Aged Care providers have been removed as they may be subject to change.</p> <p>The Hall and Prior development is noted in Table 7 as Karingal Green indicating 160 beds.</p> <p>The aged care table was updated to reflect recent approvals and completed developments. Figures represent nursing home type accommodation and do not include independent living units.</p> <p>Factors influencing aged care added. Health factors, while relevant to the population profile are a matter better addressed in the Aged Care Strategy as opposed to LHS.</p> <p>Comment that retention of vegetation on aged care sites is beneficial for health and amenity is noted. Support to retain vegetation and prioritise aged care development on sites already cleared is noted.</p>

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	<p>a. Page 51/2, Table 7. Note that the aged-care facilities of <i>Valencia</i> and <i>Sunshine Park</i> are now under the ownership and management of Roshana Care (Roshana Care appears to be a subsidiary of Burswood Care which, in turn, is part of the Roshana Pty Ltd group).</p> <p>b. Sunshine Park referred to above, and in Table 7 (p 51), is no longer owned and managed Baptistcare but by Roshana Care. It is a 36 bed <i>aged-care hostel</i> with its main entrance at 10 Champion Rd (not sure if that is the postal address as well).</p> <p>c. The other Sunshine Park facility at 10 Brady Road is a <i>retirement village</i> of 12 independent living units (formerly owned by Baptistcare), now also owned and managed by Roshana Care.</p> <p>Under the proposed increase in aged-care beds (Table 7, pp 51-2), note a press conference held in March 2019 at the above Sunshine Park hostel with Federal Minister Ken Wyatt and Roshana when a commitment was made to provide a new 120 bed facility there within 7 years: that figure included the current 36 beds in the hostel, and 84 new beds. This announcement was made on the back of Roshana gaining Commonwealth approval for an aged care bed licence.</p> <p>2. Karingal Green</p> <p>Has the Hall and Prior aged-care facility of 120 beds in Maida Vale now been completed? (?due May 2020)? If so, should this be shown on your Table? i.e. moved from 'Current development applications/# beds proposed' (Table 7, p.52), to 'Existing beds' (Table 7, p. 51)?</p> <p>3. Shortage of aged care beds</p> <p>It is estimated in the Strategy that on existing and potential developments, there could be a shortfall of 500-800 aged care beds in the City by 2036.</p> <p>These estimates should reflect present and future financial constraints facing aged-care facilities (see #4, below), and acknowledge a range of other issues, behaviours and policies (#5, 6,7 below) that could revise these projections downwards substantially.</p> <p>4. Financial crises in nursing homes</p> <p>An item in the <i>West Australian</i> (April 15, 2020, p. 7) stated that currently more than half the aged-care providers around Australia had been trading at a loss prior to the Covid crisis. They were seeking a rescue package of \$1 billion from the Federal government to enable them to survive the health crisis which had added further costs to care. It was feared that nursing homes could be forced to close their doors unless there was a rescue package. Without support, where will future (let alone existing) beds be found? Developers are unlikely to see returns on their investments. The focus will probably shift from aged care institutions to more home care and other options, as is already happening.</p>	
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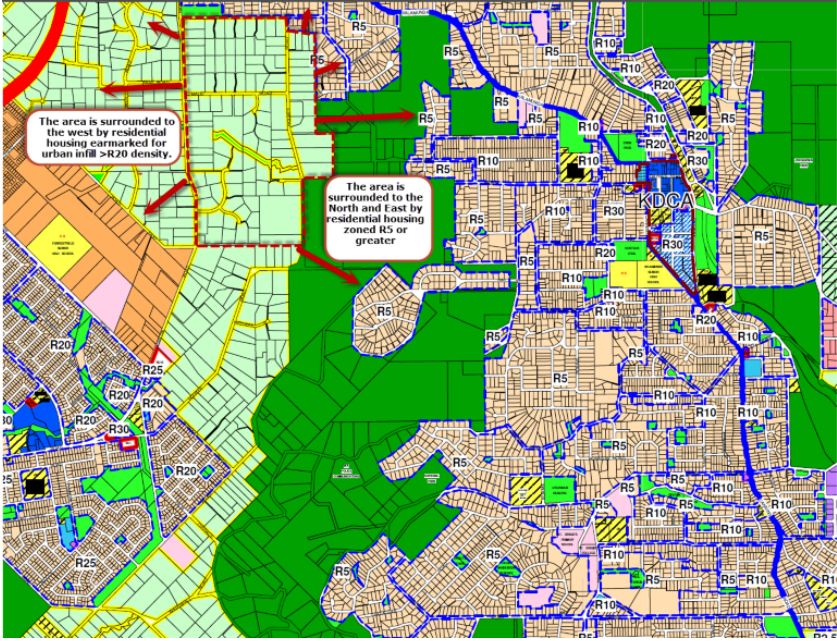
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	<p>5. <i>The Royal Commission into Aged Care</i></p> <p>Added to the foregoing are pressures surrounding the findings of the Federal government’s 2019 <i>Royal Commission into Aged Care Quality and Safety (Interim Report)</i>. A fundamental outcome of the Inquiry was that in spite of numerous previous inquiries and knowledge of systemic failure in the care of older Australians, there is still a serious shortfall around the country in aged-care quality and safety (including disability care). A major overhaul is urgently needed to address the problems of access to services, waiting times for home care packages, substandard care, and an insufficiently trained and underpaid workforce.</p> <p>It is apparent that much work needs to be done to raise the level of care within <i>existing</i> aged-care institutions. Such a requirement may well limit the approval of new facilities in the short to medium term.</p> <p>6. <i>SRetirement villages</i></p> <p>The past couple of years have seen a good deal of adverse publicity around Australia about the terms and costs of entering retirement villages, particularly regarding confusion over contracts, maintenance, deferred management and refurbishment fees.</p> <p>While various States now are closely scrutinising aspects of retirement village management, it is becoming evident that those wishing to down-size, are reviewing their options. Increasingly attractive are the choices of moving to small, independently owned and suitably designed properties.</p> <p>In addition to the above is the increasing desire to ‘age-in-place’, bringing in help as needed through government home-care packages or private arrangements.</p> <p>Some of the future options put forward in the Strategy, such as cooperative and multigenerational housing, could offer some attractive and affordable alternatives to an ageing population. Such trends may influence older peoples’ decisions over whether to move into retirement and/or aged-care complexes -- which almost certainly will not be the cheapest options available.</p> <p>Added to which, post Covid, many people are likely to have been negatively impacted by the economic effects of the epidemic; these are likely to last for a number of years and noticeably constrain lifestyle and care choices.</p> <p>7. <i>Health factors</i></p> <p>Have the demographic projections presented in the LHS factored in lifestyle/health factors -- such as the increasing incidence of obesity and diabetes in the community – and how these may negatively influence cohort survival rates and longevity and thus future demands for aged care?</p> <p>8. <i>Potential sites suitable for aged care development</i></p>	
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	<p>a. The 2010, 2014 LHS identified several large sites in the Kalamunda City area as potentially suited to aged-care accommodation complexes. The 2020 LHS (Table 1, <i>Housing Strategy Actions</i>, p11) notes that no further action is required on these sites.</p> <p>Does this mean these sites are no longer under consideration, or could be revived at some future date ? (Wilkins Rd is presumably off the table). Listed earlier were: Brentwood Rd, Wattle Grove; Hillview golf course, Maida Vale; Pioneer Park, Forrestfield; East Terrace Reserve Kalamunda; Bougainvillea Ave, Forrestfield, and Advent Park, Kalamunda.</p> <p>b. Noted in the 2020 LHS are four current investigation areas for aged-care: Heidelberg Park; Cambridge Reserve, Dixon and Byron Roads (? now to be put forward to Council for review). These options are strongly supported.</p> <p>Apart from the big advantage of these being government owned land (thus easing land transfers and costs), they are large sites that could readily accommodate integrated aged-care and living complexes, at the same time as retaining native vegetation on site. The first two sites would require very little, if any, removal of native vegetation (not sure about the other two, but these have an over-riding advantage of being close to the Kalamunda town centre, public transport and services, one of the key recommendations arising from the City's <i>Aged Care Advisory Committee</i> in 2016).</p> <p>9. Development constraints</p> <p>Section 18 of the LHS 2020 (pp 75-79) discusses various constraints on development, covering water, fire, topography and 'character'.</p> <p>It would be desirable to see native vegetation taken in as a separate heading under 'Development Constraints' as this can influence planning decisions. The various <i>Local Planning Scheme</i> sub-strategies for the City clearly set out the desirability and need to preserve this natural asset.</p> <p>10. Preservation of native vegetation</p> <p>As noted above, Section 18 (Development Constraints) of the LHS states the importance of retaining the special character of the Hills region. People live here to enjoy the natural environment, its larger lot sizes and tree cover. Kalamunda prides itself on being known as the 'Home in the Forest', as well as being located within one of the world's biodiversity hotspots (<i>Local Biodiversity Strategy Kalamunda, 2008</i>).</p> <p>It is worth noting that in the <i>2018 -2028 Local Environment Strategy (Kalamunda Clean Green)</i> for Kalamunda City, 97 percent of respondents to a survey said that bushland, trees and natural vegetation were important to them. The Strategy saw these as vital to maintaining a healthy community.</p> <p>The Senior Curator of Kings Park, Grady Brand (having worked in the Park for over 40 years), has said that there is a scientific acknowledgement that the more bio-diverse a landscape people immerse themselves in, the greater the benefit to them as a human (<i>The West Australian</i>, Travel Section, April 18, p7).</p>	
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	<p>There is a concern by many in the community that growing population and land use pressures will see an on-going reduction in areas of natural vegetation around the City, that their importance to the nature and character of our local environment, and as habitat, will be subsumed to development priorities.</p> <p><i>A strong plea is made to consider the importance of retaining and protecting natural vegetation as much as possible in any future aged-care and retirement housing developments in the City; and that land already cleared be given priority over naturally vegetated sites.</i></p>	
3.	<p>Foothills Investigation Area</p> <p>Please find attached our submission as a response to the current Draft Local Housing Strategy 2020-2025.</p> <p>Our submission is self-explanatory and highlights the flaws in the position the City of Kalamunda have adopted regarding the Foothills Investigation Area. Our submission is supported by the landowners in our area as listed in the document (and cc'd here).</p> <p>As explained in the submission, we have successfully defended our position <u>twice</u> previously with the City of Kalamunda and we are frustrated to have this position reversed again without adequate justification or explanation. So we ask that if the City again chooses to ignore us, then we should be provided a public meeting prior to the final draft being released so the matter can be discussed.</p>  <p>To: City of Kalamunda</p>	<p>The 'Foothills Investigation Area' was included in the Local Planning Strategy prepared in 2010 and adopted by the WAPC in 2013.</p> <p>As a result of submissions, the City has considered the request to advocate for this area to be included and re-assessed the merits of this proposal as part of LHS submissions. However, on balance, the justification for rezoning to facilitate low density rural-residential subdivision of the rural area is not consistent with the following principles of Perth and Peel @ 3.5 million to:</p> <ul style="list-style-type: none">a) Develop a consolidated urban form that limits the identification of new greenfield areas;b) Avoid areas that are at high risk of bushfire, and;c) Limited support for new rural residential development, with the emphasis on areas currently zoned for that purpose. <p>Strategic planning for infill areas aims to facilitate compact, high density development within walking distance of activity centres and high frequency public transport routes.</p> <p>From the City's perspective, it is considered that low density rural-residential style subdivision in this area is inappropriate for the following reasons:</p> <ul style="list-style-type: none">a) The WAPC did not include the area in the NE Framework subsequent to the City's submission on the NE Framework to include the area and its inclusion in the Local Planning Strategy 2013.b) The area has limited access to servicing infrastructure.c) Bushfire constraints and considerations.d) Management of landscape impacts which refers to the effect when rooftops encroach into the view of the hills as seen from the Swan Coastal Plain.e) Topographical constraints and considerations.f) Housing targets for the City are currently met with the areas already identified for future development investigations.

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	<p>Re: Draft Local Housing Strategy 2020-2025</p> <p>We refer to the City of Kalamunda Draft Housing Strategy 2020-2025.</p> <p>Our reference is specifically to Page 49: Item 10:3 Foothills Investigation Area which we define here as “our area”. This submission is on the part of all landowners listed to the end of this document, collectively referred to as “we”.</p> <p>Our area has been addressed in the Draft Housing Strategy as an “are no longer under investigation”.</p> <p>We request that the City reconsiders this position and continues to recognise our area for development with subdivision potential in the near term. We believe that no longer recognising our area for investigation is contrary to the position previously held by the City of Kalamunda in recent history (refer Annex A) and the desires of the landowners.</p> <p>A summary of our reasons are provided below:</p> <ol style="list-style-type: none">1. This is the desire of many landowners in our area.2. Our area was already earmarked for subdivision potential under multiple shire plans including the Shire’s Local Planning Strategy 2010 (which was endorsed by WAPC in February 2013) and again in the North-East sub-regional planning framework 2015 (Perth and Peel@3.5million).3. Re-zoning of this area to the Residential Planning Code of R5 allows lots of 2,000 square metres in size, which is relevant and consistent to the surrounding areas to the North and East. The R5 zoning eliminates the novel “landscape scaring” concern raised in the draft strategy and would retain the bush feel of the area. It would also not require major infrastructure changes such as sewerage or any major changes to bushfire planning or related topographical constraints.4. The areas to the immediate North and East of our area are already zoned R5 or greater and the areas to the West are earmarked for “high density” lots. Including our area to recognise subdivision potential ensures a consistent approach is applied to all landowners. <p>By not allowing our area the opportunity to subdivide in the future (whilst area surrounding us are provided property value growth and downsizing opportunities) it seems that we will be watching the City grow around us with none of the benefits and all the downsides.</p> <p>We are frustrated that we have fought, successfully, on two prior occasions to be included in the City’s plan as a Foothills Investigation Area (with subdivision potential) only to learn, after a decade, that we are again facing the same battle.</p> <p>We find it particularly odd that the City of Kalamunda appears to use the WAPC decision – (“this area was not supported by the WAPC in the release of the NE Framework 2018 and was not identified for urban expansion or investigation purposes”) – as an argument against inclusion of our area as a Foothills Investigation Area. This position contradicts the City’s previous held position during the WAPC framework discussions when it agreed with a substantial number of landowners to include our area as a Foothills Investigation Area. The fact that the WAPC chose</p>	<p>Overall urban or rural-residential development of the foothills area is not considered to be consistent with the principles of Perth and Peel @ 3.5 million and is not consistent with the NE Framework.</p> <p>Whilst the City understands that expectations may have arisen with the Local Planning Strategy 2013, it is important to note changing priorities in the last decade including considerations related to bushfire and those outlined above.</p> <p>The officer recommendation is to discontinue investigations into the Foothills Area where these areas are not identified by the NE Framework.</p>
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	<p>to ignore City of Kalamunda's informed position – without explanation – seems hardly an argument to remove our area from the plan with subdivision potential.</p> <p>We request that the City of Kalamunda revises its position concerning our area in the Draft Local Housing Strategy 2020-2025, including it as a Foothills Investigation Area; which is consistent with the prior argued positions and landowners wishes.</p> <p>This submission is supported by the landowners in our area below: [Table redacted for privacy - 36 contact details provided]</p> <p>Annex A: Summary of recent town planning history regarding assessment of our area shows precedent for subdivision potential of the area and the inconsistency of the current City of Kalamunda Draft Local Housing Strategy 2020-2025 with these positions.</p> <p>2010</p> <ul style="list-style-type: none">• In the Kalamunda Shire's Draft Local Housing Strategy of 2010 our area was neglected from any consideration of a future zoning change whereas all surrounding areas were addressed.• We approached Kalamunda Shire to include our area as a Foothills Investigation Area.• Kalamunda Shire obliged and amended the draft <p>2011</p> <ul style="list-style-type: none">• The Kalamunda Shire's Local Planning Strategy was released in 2011 and our area was gazetted as a Foothills investigation Area allowing for future subdivision potential. <p>2013</p> <ul style="list-style-type: none">• The Kalamunda Shire's Local Planning Strategy was endorsed by the WAPC in February 2013 recognising the Foothills Investigation Area. <p>2015</p> <ul style="list-style-type: none">• In the North-East sub-regional planning framework (Perth and Peel@3.5million) authored by the WAPC, our area was, once again, neglecting in the draft and without any reference to a Foothills Investigation Area.• We again approached City of Kalamunda (formerly Shire) to appeal• City of Kalamunda supported our request and included our area in the Foothills Investigation Area boundary – as previously gazetted and endorsed by the WAPC. <p>2018</p> <ul style="list-style-type: none">• WAPC deleted the Foothills Investigation Area completely from the final Draft North-East sub-regional planning framework without explanation.• City of Kalamunda did not appeal the WAPC decision despite it being contrary to their 2015 framework position. It did, however, state the investigation area shall <i>"remain as part of any future Strategic Planning undertaken by the city"</i> <p>2020</p>	
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	<p>City of Kalamunda Draft Local Housing Strategy 2020-2025 concludes that the Foothills Investigation Area is no longer under investigation.</p> <p>Primary reason given:</p> <p><i>a) "this area was not supported by the WAPC in the release of the NE Framework 2018 and was not identified for urban expansion or investigation purposes."</i></p>	
4.	<p>Foothills Investigation Area</p> <p>Following our Submission to Council for consideration, we are once again making this request which we have done for many years.</p> <p>As old residents, since 1983, we once again plead for your support in our cause for subdivision of our area.</p> <p>We feel strongly that we have three energetic/ enthusiastic councillors in North Ward who will make the difference.</p> <p>Looking forward to your support.</p>	See submission 2.
5.	<p>Foothills Investigation Area</p> <p>I write to express my disappointment and objection to the Draft Local Housing Strategy.</p> <p>The City sought comments from the landowners and residents on how the City's future housing needs of its residents can be met in Kalamunda. And yet deliberately eliminate the Foothills Area from being considered for future urban and housing development. It is not appropriate for the City to remove the Foothills Area from its Local Housing Strategy just because the WAPC thinks so.</p> <p>I would appreciate the support from you to represent us in fighting hard for the Foothills Area to be considered as a possible future housing area capable of creative subdivision and vibrancy local community. Simply for the WAPC to say the area is 'no longer under investigation' is NOT acceptable to us.</p> <p>As a landowner, resident, and ratepayer in the City for many years, I appeal to you and seek your support to include the Foothills Area as an area worthy of consideration and be included in the Local Housing Strategy for possible future housing area capable of meeting the housing needs of the City of Kalamunda.</p> <p>Please do not 'kowtow' to the wishes of the WAPC.</p>	See submission 2.
6.	<p>Foothills Investigation Area</p> <p>I write to express my disappointment and objection to the Draft Local Housing Strategy.</p>	See submission 2.

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	<p>It is frustrating as a land owner and long standing resident, that despite the City seeking comments from local landowners on how the city's future housing needs should be met, and the support for future urban and housing development in the foothills area by the landowners, the city has removed the area from the Local Housing Strategy. I believe that the residents and landowners should have a right to determine what happens to the area they live I not the WAPC. In this case, the WAPC has influenced the city to remove the Foothills Area from its Local Housing Strategy, against the wishes of residents and landowners.</p> <p>I would appreciate the support from you to represent us in fighting hard for the Foothills Area to be considered as a possible future housing area capable of creative subdivision and a vibrant local community. Simply for the WAPC to say the area is 'no longer under investigation' is NOT acceptable to us.</p> <p>As a landowner, resident, and ratepayer in the City for many years, I appeal to you and seek your support to include the Foothills Area as an area worthy of consideration in the Local Housing Strategy for possible future housing area capable of meeting the housing needs of the City of Kalamunda.</p> <p>Please do not let the WAPC overrule the wishes of your residents.</p>	
7.	<p>Foothills Investigation Area</p> <p><u>Refer to Appendix i. Foothills correspondence submission attached.</u></p>	See submission 2.
8.	<p>The Glades</p> <p>Please find attached my completed Feedback Form.</p> <p>I would also like to provide some further commentary on the proposed Glades Investigation Area as part of Question 6 on the Feedback Form.</p> <p>Firstly I support the notion of investigating greater housing diversity and density around the Activity Centre that is the Glades – my main issue is that the catchment / investigation area proposed is one sided and does not contemplate those properties on the western side of Canning Road – I understand that the main reason for this is the capacity of the existing and proposed reticulated, gravity fed sewer system – I am of the view that for the Glades and surrounds to truly maximise its potential and serviceability, a further review and expansion of the sewerage system is required to accommodate the residential catchment on the western side of Canning Road. This would, in time, create an Activity Corridor along Canning Road linking the Kalamunda Town Centre and the Glades, supporting the use of public transport, housing diversity and the sustainable growth and economic viability of the Glades and other non - residential activities in what would be a 'balanced' catchment.</p> <p>I would welcome the opportunity to be involved in further engagement undertaken by the City on the Glades investigation area to explore this and other opportunities more fully - thank you for the opportunity to comment on the draft Strategy.</p>	<p>Support for the Glades investigation area is noted.</p> <p>The existing sewer system is gravity-fed limiting the ability of lots west of Canning road to connect with the sewerage network.</p> <p>The City does not anticipate that the Glades would become an additional activity centre as it would likely compete with the existing Kalamunda town centre.</p> <p>Further consultation with the surrounding community would be required to determine future outcomes for the Glades area.</p> <p>NOTE: 'Investigation Area' does not guarantee an urban outcome or increased density, and could result in no change at all. The term 'Investigation Area' is simply flagging an area for further community consultation and preparation of technical studies to determine if it may be suitable for change. Each Investigation Area will be determined based on individual merit, and in some cases the most appropriate action may be no change at all.</p>

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	<p>I have read the document and have a few comments about land areas and investigation areas.</p> <ol style="list-style-type: none">1. Kalamunda Glades is mentioned as a medium term project. I think this needs to be amended to short term. Please see my submissions from 2005 and 2011. My comments have not really changed and I believe strongly that these lots surrounding the Glades can and should be increased in density. The land is close to an activity centre, on a main transport route, has ability to connect to sewer, and housing stock is definitely [sic] pre 1980's. 6 Lewis Rd was built around 1964, and 131 Canning Rd was built around 1970. With the empty two lots (127 and 129 Canning Rd) plus the two lots at 6 Lewis Rd and 131 Canning Rd would give a land area of approximately 5770m2. Certainly a larger style community housing project may be a possible use for this land. The sewer cost is a hurdle but if the density was there and enough landowners were willing to develop or sell to a developer then there could certainly be a good housing project in this precinct. I have been trying to get council to consider this over the last 15 years and for it to be put in the medium term projects will be more frustrating.2. Heidleberg [sic] Park is listed as a short term project. This project has come out of the blue and shot to number 1 priority, when looking to fulfil a need for the community [sic], however the location has a number of hurdles to overcome, mainly not having good transport links, no sewer, water supply issues, and no activity centre, and is in a bushfire prone area. The good things about it is that it is owned by the City and can be managed appropriately. Once the land is sold however the City loses a valuable POS area, which for a growing community will put more pressure on the already busy POS areas. I think however that the rezoning mechancism [sic] is flawed and too narrow focussed. The land across Canning Rd has odd zoning in that it is zoned Rural Landscape Interest, yet most of the lots bordered between Canning Rd, Pomeroy Rd, and Annetts Rd do not meet the minimum lot size requirements or uses for this zoning. There are also businesses operating from some of the lots within the area. This land may be a a better option than the Heidelberg Park land for the aged care purpose. The two lots 397 and 405 Canning Rd Walliston would provide 8 ha of land to facilitate the development and leave a nice park across the road that can be developed for the entire community to use including [sic] a new aged care faciility [sic]. This land has the same constraints as the land across the road, however the land is more elevated, has less issues for on site effluent disposal as the soil types are better than the valley within the Heidelberg Park, has less drainage issues (not in a valley) and the houses can be easily demolished. The two properties are on scheme water however would have the same issues for supply pressures. Heidleberg Park has too many constraints to overcome (some can't be) that the land across the road does not.3. I have previously provided submissions on this area for rezoning to 1 Ha minimum (similar to land in Sing Gardens Precinct) and I now believe that R5 may be a better option as the land soils are better, get better fire management by introducing road network to remove the Annetts Rd culdesac and intrduce [sic] scheme water by improving the Water Corporation tanks in the area or providing a booster pump. This would make the land safer for residential development. This could be done at the same time the Heidleberg Park rezoning process was taking place (if the land was not considered suitable for the aged care facility or could be done as part of the process). Many of the owners of this	
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	<p>land area would more than likely [sic] consider the opportunity to develop the land to a greater density.</p> <p>4. I am interested in the Halleendale Rd precinct [sic] and have done work on that land dating back to 1993 and have recently completed the Conti Gardens subdivision.</p> <p>I would appreciate the time to come and speak to you about these brief points made that could make a difference to the community and improve the City of Kalamunda's offering of housing options at the top of the hill and not just in the foothills. Many people want to stay on the hill without having to move out and these options work well towards achieving that goal.</p> <p><u>Refer to Appendix ii. The Glades submission attached.</u></p>	
9.	<p>Gooseberry Hill – Graham Road</p> <p>I do appreciate the necessity of keeping respect to those in the WAPC. But I am no fan of Saffiotti due to her rejection of our scheme amendment within 3 weeks of her appointment as Minister which also saw her reject the Wilkins Road project at the same time which was far more important than ours. This caused me to label her as shoot from the hip Saffiotti as she could not have taken any careful aim on both of these projects within that short time and particularly ours which had been under consideration by the WAPC for several years which also saw them asking us to consider the inclusion of those blocks on Ocean View Parade .</p> <p>More importantly I forgot to discuss the denial of increased population in areas listed as fire prone.</p> <p>What has to be recognised is that all the blocks of land included in Scheme amendment 14 included residential homes but had a significant availability of land area to allow the creation and erection of separate residential accommodation buildings generally referred to as Granny Flats which would see an increase in residential population on each block of at least six 2 persons leading to a possible increase of 16 persons for the amendment, and this could have been approved by Council without the requirement and need of WAPC approval. We ourselves were able to successfully have approved a 100square meter bungalow on our block and in which we had hoped to accommodate our daughter with her son who presently live in Victoria and this would also have complied with the ruling at that time of only allowing direct family persons to live there. Regrettably we were unable to persuade her to do this . But what also occurred was that Minister Day cancelled the requirement of only family being allowed to be accommodated and had I known this was to happen I am sure we would have proceeded with this building but unfortunately By the time this was effected we had exceeded the allowed building time .</p> <p>Which would have required us to resubmit our proposal for the granny flat. So what I wish to declare is that if scheme amendment 14 had been approved allowing extra persons accommodation on a sub divided block should seriously have been considered and allowed despite being in a bushfire prone area.</p> <p>In order to meet the required increase of population determined in Perth and Peel @3.5million and ideally to achieve that should see the persual of infill development as these would already</p>	<p>The City will not be considering Graham Road for rezoning for the following reasons:</p> <ul style="list-style-type: none"> a) The application was previously refused by the State Government and the position is unlikely to have changed; b) The land is in a bushfire prone area and located near the entrance to the Zig Zag limiting safe evacuation points; c) The land is not identified in the NE Framework and will have negligible impact on dwelling targets; d) 85% of residential growth is expected to occur on the swan coastal plain as opposed to the hills areas; e) The sites are not located within an 800m walking distance of Kalamunda Activity Centre, and; f) Ancillary accommodation can be approved on lots greater than 450m2 regardless of subdivision potential.

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	<p>have the necessary and required sources of existing road access, mains water supply, mains electricity supply, and in some cases natural gas supply.</p> <p>The DLHS stated that along with Gooseberry Hill , Lesmurdie and Kalamunda were regarded as ideal locations to see young families and elderlies find accomodation in existing or developed accomodation. But as these areas are also listed being in bushfire prone areas will this see the State unreasonably rejecting this increase in population in fire prone areas. I seriously believe that government should have a far more practical and fair resolution on this matter.</p> <p>I think I may have told you previously that we had attempted to sell our property which would have seen me abandoning sub dividing procedures but I am so glad about our failure in doing this because of the current Coronavirus restrictions which sees us confined to home and being such a nice place with terrific views makes it a delight to be here.</p> <hr/> <p>I have spent a good deal of time reading all about the submissions in the DLHS that you sent me which must have taken months to prepare.</p> <p>But as recorded by me to you reading about the Graham road scheme amendment 14 rejection is of considerable despair to me. The reading is as follows:</p> <p>“The determination was not supported as per section 87 of the planning and development Act 2005 and the determination could not be reconsidered or rescinded.</p> <p>Due to the decision by the Minister it is therefore recommended that this area will no longer be investigated for development purposes due to the inherent bushfire risk and decision of the minister.”</p> <p>This effectively kills our proposal before we can submit comment on the issued DLHS which I consider dictatorial grossly unfair and undemocratic.</p> <p>The theories issued by the minister are theory based and not factor assessed. To be prevented in creating the safety factors I have advised you of (extra route of escape, barrier defence created in development) is a tragic denial to both myself and my neighbours.</p> <p>I do seriously believe that the bushfire risk is overstated and over played by state planners, this opinion being based on the fact that ourselves and neighbours have lived in this spot for over 40 years and have never suffered serious danger from bushfires and the high BAL (fz)estimates assessed for our properties is probably because of the vegetation we all have and love.</p> <p>A further frustration caused by the minister was by her rejecting this scheme amendment denied us making an appeal ,so as I stated before it is totally undemocratic and dictatorial.</p> <p>A further disappointment occurred when I read in the DL H S you sent that Gooseberry Hill along with KALAMUNDA and Lesmurdie predicted to have the greatest rise in residential housing for young families and the elderly but how will this happen with all these restrictions in place.</p> <p>I have previously been in touch with Andrew Fowler Tutt to ask him of his opinion as to whether resubmitting this amendment could be successful after I sent a letter that I had received from Gail McGowan which knocked our proposal on the head. He was doubtful we would have any success.</p> <p>This just leaves me asking myself whether a more practical approach would be to leave this proposal until the next state government vote in the hope another party be voted in which should see a new Planning Minister which I would hope would be more practical and fairer.</p> <hr/>	
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	<p>Proposed request for the Rescinding of Scheme Amendment 14 which includes rezoning from the present R 2.5 (1 acre lots) to RS (1/2acre lots). Also a revision required to the statement on page 51 of Draft Local Housing Strategy which states that It is recommended that this area will no longer be Investigated for development purposes due to the inherent bushfire risk and decision of the Minister. This may result in an unfair judgement without any true consideration and resolve being taken and which will deny the establishment and creation of essential safety factors which are of extreme importance due to the bushfire risk that is supposed to exist in this area and has been the reason for previously denying approvals to be granted which can only be stated as being biased and unfair. So, for this reason we will prepare and submit our proposal in the hope that common sense and reasoning will prevail.</p> <p>Dear Ms Hardey It is of sincere hope that you will have time to be able to study this submission after which could it be passed onto strategic planning who have been of assistance and advice to us. Should a revision not be executed to the text appearing on page 51 of the current Draft Local Housing Strategy titled as 10.2 Graham Road and Ocean View Parade, Gooseberry Hill, this may result in an unfair assessment which could cause the loss of the safety factors to be described in our submission. The proposed request for the rescinding of Scheme Amendment 14, which includes Lots 1,2, 293 and 295-300, Graham Road (Green boarded on attached Land plan Map) ,is of extreme and essential importance to be considered as approval will result in allowing the creation of safety features which can only be accomplished after approval and when the proposed development has been completed and which will defend against any Bushfire Attacks occurring in this region and for which has previously been denied due to rejection by the Minister for Planning . The Safety Factors that would result when development is approved are detailed as follow:</p> <p><u>Safety Factor 1: which to be achieved requires the approval of rezoning to be accepted .</u></p> <p>All blocks of land included in this scheme amendment have a zoning of R 2.5 residential zoning and have the important factor and benefit of having dual road access, Graham Road located on the eastern border of each block and Lascelles Parade on the western border of each block. Due to the fact that all properties on Graham Road presently only have one route of escape which in the event of bushfire attack occurring could be of major concern and worry by all present residents . It is for this reason that has led to the preperation [sic] of this proposal being made. Had approval previously been granted to the land owners included in the Scheme Amendment 14 submission and which would have included rezoning from R2.5 to RS, this would have permitted the subdivision of each block to be granted and for which the requirement of an additional access driveway providing access and egress to each of the newly created blocks and for which this would have been a necessary and complying requirement. In the process of subdivision it would be stipulated that in the creation of the new driveways on each of the new blocks that the connection of the newly created driveway has to be made to the existing driveway which is of stipulated and compulsory requirement as this will result in the creation of having 2 routes of fire escape on each block, thus providing a significant factor of safety which does not presently exist</p>	
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	<p><u>Safety Factor 2</u> :Sub Division of each land block listed in Scheme Amendment 14 will see the creation of half acre blocks which will allow the construction of full sized 4 bedroom homes which will be required to comply with the factors specified in the Australian Standard AS 3595(Construction of Buildings in bushfire prone areas) which details the structure and format of windows and access doorways together with specified material that required when constructing of the residence is commenced. This will result in the creation of a residence resistant to bushfire flame and ember attack</p> <p>A further compulsory factor being the requirement to establish a 20 meter APZ (asset protection zone) which is required to encircle the whole of the newly created residence and which when created will result in the major removal and in some cases total removal of existing fire fuel load that presently exists on these blocks and would be required before development is commenced. The newly constructed residences with these required specified requirements will see the creation of defence barriers which will be able to prevent the spread of fire should bushfire attack occur to the newly created blocks and which will result in the benefit to neighbouring properties which will also include those residences located on the eastern side of Graham Road (see as blue bordered [sic] on attached Land Map) and which are not included in Scheme Amendment 14, the reason for this being detailed later, As a result of the creation of these safety features, serious consideration should be given to allow and grant approval to be given to the request for the rescinding of Scheme Amendment 14. Should this request be denied and in the event of bushfire attack occurring to these properties, due to the present factor of only one route of escape existing for each property on the R2.5 section of Graham Road, could see residents trapped in their homes which could lead to serious injury and in some cases even death and for which the State Government and Minister could be held responsible and liable for such disasters due to their denial. <u>Anticipated queries that may be raised by the Decision Makers:</u> As each property owner owns the total block of land positioned and located between Graham Road and Lascelles Parade, what has prevented these owners from establishing the extra route of escape should bushfire attack occur. The reason for this being that the cost involved for the establishment of new driveways will exceed \$100,000.00 for most of the newly created blocks thus requiring the option of being able to sell the newly created block which would financially then allow for the creation of the new access driveways. The reason for these high costs is due to the standards required to be complied with in the construction of the new created driveway which will require to be of sufficient size and structure for the allowing of large Vehicular access which needs to include fire trucks which also require the provision of passing bays positioned every 20 meters and connected to the main driveway and also a circular turn around bay 20 meters in diameter to allow trucks to turn 180 degrees so that they can exit the property. As previously stated a condition of subdivision is the requirement that the newly created driveways are to be connected to the existing driveways which will result in the creation of 2 routes of escape for all blocks that have had subdivision approval and in the event of bushfire attack occurring should one escape route be blocked by fire, thus having an extra route of escape available can only be considered as essential.</p> <p>A further question that may be raised is the query as to why those properties on the Eastern side of Graham Road R2.5 zone (bordered blue on attached land map) have not been included in the total rezoning plan, the reason for this being that those blocks of land</p>	
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	<p>on the Eastern side unlike those on the Western side do not have dual road access which also includes all those properties located on Ocean View Parade (bordered red on attached land map) and for which is considered an essential factor when providing safe access and egress to all blocks as and when required. Therefore if these blocks were allowed to be subdivided the newly created block would have to be configured in battle axe format which is not favoured by DFES who consider these designs to be of high risk in the event of bushfire attack occurring and when requiring their fire fighting teams to access these properties, and with the high risk probability of fire breaching the single access drive way existing on these battle axe properties could lead to their teams being trapped. A further negative factor being that it is probable the newly created blocks would have to be located on the steeper land slopes, as the present level land on these blocks have been used for the construction of all existing present residences and this could lead to excess effluent disposal from the new blocks flowing down the hillside and to enter the Helena river which is located at the base of this hill and for which is a severely prohibited factor by both state and local health departments. This factor is not of concern for the Western side located blocks due to satisfactory absorbing of effluent in conventional [sic] septic systems with leach drains located on all properties on the west side of Graham Road with the exception of block 297 where the whole residence was constructed on a rock outcrop which proved costly but was successful and which included a swimming pool but resulted in the requirement of an ATU sewerage system which does not require leach drain provisions and whose operation has been most satisfactory.</p> <p>A further and more critical requirement that has to be accepted by all owners on the Western side of Graham Road is to allow all those residents residing on the Eastern side to have access to their driveways in the event of and occurrence [sic] of an emergency situation. This being considered a critical factor due to the fact that several of the residents on the eastern side of Graham Road were strongly opposed and critical of the proposed scheme amendment 14 for what they declared would result in the impact and destroying of vegetation, and this may well have been a principal reason leading to the rejection of Scheme Amendment 14.</p> <p>This factor of not destroying and clearing presently existing vegetation should be seriously reconsidered by the residents on the eastern side of Graham Road as on one occasion this saw that the failure to reduce vegetation on their hillside led to the the [sic] rapid spread of fire up the Eastern land slope leading up to [sic] the hill's ridge on which Graham Road had been constructed, the fire being set by an irresponsible youth who set fire to his car which he had parked alongside the Helena River which borders the low side of this hill, his aim being to make an insurance claim. But once lit the fire soon spread to surrounding bush and then saw it transferred to existing vegetation on the hillside slope which led to the rapid spread of fire advancing up this hill which then resulted in the fire's breaching of Graham Road which resulted in setting fire to vegetation on the western side of Graham Road as well. This caused considerable concern to the owner, Lynn Pilbeam, of the block closest to where the fire breach had occurred and which resulted in this owner being desperate to carry out a quick escape for his safety and because the fire had breached Graham Road this prevented exiting by their single route of escape which would have been southward on Graham Road. Due to fire having breached Graham Road this resulted in his</p>	
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	<p>requirement to find an alternative route of escape to be sought and which resulted in taking the only available escape which was having to walk and march down their land with his wife and then onto Lascelles Parade, and by walking a short distance southward on this road allowed access to Lynn's sister's home whose driveway is connected to Lascelles Parade and this is where they remained until the fire had been fully extinguished which was accomplished in a relatively short time by our talented Kalamunda Fire Brigade. However ,this fire had caused damage to a residence on the Eastern side of Graham Road which saw the destruction of a garden shed and spot fire damage to several points on the exterior of the home residence.</p> <p>Another important factor to be considered was that it was fortunate that despite being fairly elderly both Pilbeam husband and wife were fit enough to carry out escape by marching down their block. But had approval been previously granted to Scheme Amendment 14 this would have permitted the Pilbeams to have subdivided their block and for which would have seen the creation of an extra route of escape down the newly created block in the form of a driveway and with the subdivision requirement for this driveway to be connected to their existing driveway which exits onto Graham Road . This would have allowed husband and wife to access their car which was parked in their garage and then to drive up their existing driveway to the point where the new driveway was connected and at which point they would have turned into thus allowing them to drive down the newly created driveway and then to exit onto Lascelles Parade. This method of escape being far quicker and safer than having to march the required route.</p> <p>For your general interest I have attached a 2 page Strategic Planning Justification which was prepared [sic] by a professional Planner and summarises much of what has been stated by us but has included comments with respect to Lot 300 in which his advice of this Lot only being 3263 m2 and therefore will not be allowed to sub divide if and when approval has been granted, but the fact that this land is boarded by a land strip separating it from lot 299 which is owned by the City for the purpose of connecting Upper Lascelles Parade to Graham Road and which would generate an additional route of escape for all residents whose 10 homes are located on Upper Lascelles Parade, but should this not occur discussions have revealed this land being added to Lot 300 which would enable subdivision when approval is granted.</p> <p>Imposed Restrictions:</p> <p>A reason given for the denial of previous proposals is the government's decline in allowing an increase in density of persons and property in bushfire prone areas. A factor of importance to be considered is that all existing residences in Graham Road have the right of allowing the construction of Granny Flats on their land which would see an increase of at least 2 resident persons per granny flat who had to be directly related to the existing owners of the residence and to be considered is that the addition of these persons is legally achieved in a supposed bushfire prone area. As There is the requirement that these granny flats should be built close to the existing residence which would result in the sharing of existing services which would include driveways. Another factor of consideration is that the previous Planning Minister, John Day had decided to remove the requirement of family relationship being required which therefore allows all persons to</p>	
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	<p>be accommodated in these Granny Flats, and for this reason it would be highly likely that more than 2 persons per accommodation would legally be allowed , and as this would be located in a bushfire prone area this would result in the legal increase of residential population in a bushfire prone area. It is for these reasons, that serious consideration should be given for the reason of allowing approval of scheme amendment 14 to be granted which would see subdivision of each block of land on each property which would create ½ acre blocks and of which in size will allow for the construction of full sized family homes and for which will acheive [sic] an increase in resident population of both adults and children ,which otherwise would have required residing in Granny Flats which would be far more restrictive.</p> <p>As it has been stated in the recently issued City of Kalamunda - Draft Local Housing Strategy, Kalamunda, Gooseberry Hill and Lesmurdie are predicted to have the greatest rise in young families and the elderly and the creation of the 1/2 acre sub divided block as listed in Scheme Amendment 14 will have great appeal to young families due to the available area on each block which could see the inclusion of swimming pools and further exercise items such as trampolines, slides and swings . A further factor of appeal due to the land clearanc created for the APZ which would allow the creation of grass lawns and being of significant size, this would have great appeal for youngsters interested in footy, cricket and other sports</p> <p>.Another factor of consideration, is that here in the West we live in areas that have a fire index that is quite a bit less than that existing in the Eastern States which includes Queensland, New South Wales ,Victoria and the ACT. It is for this reason that saw the large and rapidly spreading bush fires that occurred in the East this year and for which resulted in enormous damage which sadly included the death of several residents residing in these areas .Here in the west several fires did occur during that same period but were nothing like as large and destructive or causing the loss of life which had occurred in the Eastern States and which saw the world wide reporting of these incidents.</p> <p>This factor can only lead to the opinion that choosing to live in bushfire prone areas here in the west has to be considered a much safer option than having to live in Eastern States bush fire prone areas.</p> <p><u>Factors that should be made aware of and remembered:</u> A significant number of years ago the state government ceded 15 one acre blocks located on the Northern end of Graham Road which abutted the present and existing northern placed land blocks on Graham Road on both East and West sides of Graham Road and can be viewed on the attached land plan map as those blocks boardered [sic] in orange. The resulting factor of this revesting of land saw the Shire of Kalamunda being denied an increase in their residential population of at least 30 persons. Therefore when and if approval is eventually granted to the Scheme Amendment 14 proposal would see a recovery of half the number of persons, there being 6 additional ½ acre blocks which would theoretically see an increase of at least 15 persons.</p>	
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	<p>An important factor to be remembered is when Scheme Amendment 14 was first submitted for approval it was held in consideration by the then Planning Minister John Day who delayed giving final approval as this scheme amendment was not included in a housing strategy which did not exist at that time. But the fact that this proposal was considered both practical and creative by both the minister and the WAPC which saw to it being held under consideration for several years and to wait for it's inclusion in a Housing Strategy when issued, which results in the belief that had the present Draft Local Housing Strategy been existing when Scheme Amendment 14 was first proposed and issued that there would have been a high probability of it being approved so those factors should be born in mind currently.</p> <p><u>Factors of Concern and Envy:</u> All residents and owners of properties on the R2.5 section of Graham Road have been disturbed by seeing their neighbours in the southern half of Graham Road being able to sub divide their land, the reason for this being that they were fortunate in their land having R10 zoning which allows for properties of 1/4 acre to be created. And when travelling to the southern end of Graham Road at which point there is a pathway with steps that lead down to Lascelles Parade and when viewing the land on the other side of this road results in observing 5 recently subdivided properties of 1/2 acre each in area. These factors being of total envy to the land owners included in scheme amendment 14 as all these subdivided blocks of land are in such close proximity to their own properties resulting in a feeling of total and unjust fairness</p> <p><u>Factors to be known:</u></p> <p>The creation of AS3959 was as a result of the Black Saturday Fires that occurred in 2009 in Victoria and which caused substantial damage and deaths ,a result of which caused the Premier to request the Standards Association to prepare standards dictating CONSTRUCTION OF Buildings in Bushfireprone areas as well as describing how to prepare factors such as BALs. This also was undertaken nationwide by all our states. Shortly after the issue of this standard an amendment was added by requiring rewording and spelling of several paragraphs, also a revision to some of their equation formulas, also required was an additional paragraph to be added between the first and second paragraphs of this Standard which read:</p> <p>"There is limited evidence supporting the relationship for adjusting the forward rate of spread on steeper slopes. Therefore, where the effective slope is greater than 15degrees then 15degrees should be used for calculation purposes." This is a significant factor in assessing BALs for Graham Road's surrounding slopes.</p> <p><u>Final Assessment:</u></p> <p>Due to the factors described and the significant safety benefits that would be created from positive approval being granted, particularly when assessing and considering the creation of the described safety factors, that it is hoped that a rational and considered approach with strict and fair consideration to the proposals offered in Scheme</p>	
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	<p>Amendment 14 be assessed and considered which should prove of extreme benefit to the city by increasing population which will result and be of practical benefit to existing and future residents.</p> <p>As the largest population growth is expected to be in the foothills area which will be of high density, the availability of 7 1/2 acre lots in Gooseberry Hill could have great appeal in attracting new residents to the city of Kalamunda, particularly those who have children.</p> <p>A further positive factor if and when approval is granted being that subdivision would be classified as Infill Development whose structure and effect is of both local and state governments preference as this keeps development within the the [sic] boundaries of the existing land blocks.</p>	
10.	<p>Halleendale Road</p> <p>13 June 2018</p> <p>Request for Residential Zone: Submission on Local Housing Strategy and Rural Strategy Review – Lots 22-25 Halleendale Road and Lot 9000 Dan Close, Walliston</p> <p>Further to our recent telephone conversation you are aware that the owners of the abovementioned lots seek the City's support to facilitate a future residential zone and subdivision of their land.</p> <p>The Local State Labour MP raised this matter with the City in a meeting held with the Chief Executive Officer and mayor on the 19 April 2018.</p> <p>Based on your recent advice I understand there is opportunity for the zoning in this area to be re-assessed as part of a planned Housing Strategy and Rural Strategy review planned to commence this year.</p> <p>Accordingly the owners of the above-mentioned lots have engaged TPI to prepare a formal submission to stimulate and facilitate a zoning review for their land as part of the Strategy process.</p> <p>Having regard that the City has supported a residential zone over nearby Lot 51 (which has now been subdivided) and a portion of adjacent Lot 50, it is considered crucial that this land be examined as part of preparation for both Strategy Reviews.</p> <p>I am of the strong view that a residential zone for this pocket of lots is a logical extension to the residential zone already established for Conti Gardens. Support for a residential zone by the City Planning Department is sought.</p>	<p>Halleendale Road has been included as an investigation area in the LHS. The DPLH has advised there is some objection to including this area for investigation.</p> <p>Future land uses for this area will be pending the outcome of further discussion with the DPLH.</p> <p>Subject to confirmation from the DPLH/WAPC any proposed scheme amendment in this area will likely be developer or landowner driven, as opposed to the City. Technical studies required would likely include flora and fauna, hydrology, traffic impact assessment, preparation of a draft Structure Plan to assist with coordination of POS and comprehensive community engagement.</p> <p>The City's reasoning for including the area is that the Halleendale area requires an orderly and proper planning approach to coordinate POS, residential development and rural development to avoid land conflicts. Similarly located rural-residential land is not subject to the same urban development pressures as the Halleendale investigation area resulting from a patchwork of historic spot rezonings of R5 adjacent to rural agriculture zones. The future of this area will need to be further confirmed with the DPLH/WAPC through development of the Local Planning Strategy and in consultation with the community.</p>

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	<p>Once the Strategy Reviews are more progressed, please be advised that the owners intend to pursue an amendment to the Metropolitan Region Scheme to change the regional zoning from 'Rural' to 'Urban'. The owners would like to pursue an MRS amendment with the City's support.</p> <p>I look forward to this matter progressing in a positive manner, and thankyou in anticipation of your assistance.</p> <p><u>For more information refer to Appendix iii., iv. and v. Halleendale Road submission attached.</u></p>	
11.	<p>Halleendale Road</p> <p>Please find attached a submission on the Local Housing Strategy. [50 Lawnbrook Road, Walliston]</p> <p>This is a formal request for the City to review the existing zoning as part of strategic planning projects to facilitate a future residential zone over the entire lot.</p> <p>The subject lot is located less than 7 kilometres to the south east of Kalamunda townsite.</p> <p>The lot is currently zoned 'Residential', 'Rural' and 'local open space' under the City of Kalamunda Local Planning Scheme No 3. A local scheme amendment has been initiated to re-code the north part of Lot 50 from 'R2.5' to 'R5'.</p> <p>Adjacent Lot 51 Lawnbrook Road has very similar and comparable land qualities to Lot 50, in terms of soil, historic rural uses and proximity to reserves. Lot 51 was subject to re-zonings under both the Region Scheme and Local Scheme, with subdivision now substantially completed (known as Conti Gardens).</p> <p>It would be logical to round off the Residential zone established on Lot 51 and the north part of Lot 50, by extending it to the southern portion of Lot 50 to facilitate a more cohesive subdivision design.</p>	<p>See submission 10. response.</p> <p>Identification of the Investigation Area will provide a strategic basis for the North-East Sub-Regional Framework to consider its inclusion and for statutory MRS Amendments and statutory LPS3 amendments to be considered.</p> <p>It is acknowledged that the landowner of Lot 50 Lawnbrook Road aspires to 'round off' the development of the land with residential subdivision over the southern portion in the short term independently of the broader Investigation Area.</p> <p>There is an array of planning matters that require consideration across the precinct and a coordinated approach to planning for the broader area is considered appropriate.</p> <p>Section 10.5 has been modified to include additional commentary referencing the landowner's aspirations and making it clear that existing statutory planning approvals and zonings remain and are implementable subject to usual state and local planning considerations.</p>

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	<p>The City is requested to strategically identify the entire lot as Residential as part of the Housing Strategy and Rural Strategy Review being undertaken.</p> <p>It is noted that the owners of adjacent Lots 22 to 24 Halleendale Road have also lodged a submission seeking re-zoning of their land to Residential, which is supported by the owners of Lot 50. This area provides a prime opportunity for new residential development to cater for population growth.</p> <p>The purpose of this submission is to earmark this issue for the City's strategic review process, and allow for a zoning change to form part of public advertising of any revised Housing and Rural Strategy respectively.</p> <p><u>For more information refer to Appendix vi. Halleendale Road submission attached.</u></p>	
12.	<p>Hartfield Road</p> <p>1. <u>Re: Amending the zoning at 124 Hartfield Rd, Forrestfield</u></p> <p>As you know the block mentioned above is currently zoned "Special Rural" and I would like the zoning to be amended to either "Residential" or a higher density rating. I believe that the council is looking at "Local Housing Strategy 2020" and I would very much like to be a part of this plan.</p> <p>My land consists of 1.431 Ha and although the special rural zoning may have been appropriate 50 years ago, as we change with the times and the new Forrestfield train station is completed and with the future Wattle Grove train station planned, I think a higher density zoning would be much more appropriate.</p> <p>I have spoken to my neighbour on the Eastern side boundary and he is very keen on the idea and would also like to be a participant in the project. He also has 3.5 acres and would like to retain his existing house on 1 acre and add his other 2.5 acres to my 3.5 acres giving us a total of 6 acres.</p> <p>To further support my application, please see the attached drawing showing the close proximity of the existing sewer and the proposed extension required to reach my block.</p> <p><u>For more information refer to Appendix vii. Hartfield Road submission attached.</u></p>	<p>The City has considered the proposal to consider including 124 Hartfield Road, Forrestfield for future development investigations given the proximity to Hartfield Park and existing urban residential areas.</p> <p>On balance, the City does not support a residential outcome on this site or adjoining rural properties for the following reasons;</p> <ul style="list-style-type: none"> a) As a general guide, infill development is to occur on existing urban zoned land with limited encroachment into rural areas without sufficient justification or identification within strategic planning frameworks. b) The site is not currently identified for any purpose other than the rural designation in the NE Framework. c) The area is not identified within any investigation areas within the City's existing or proposed strategic planning framework. d) Hartfield Road provides a logical boundary to the urban / rural interface, spot inclusions do not accord with principles of orderly and proper planning which promote considered and consolidated planning. e) Engagement concerning the Wattle Grove South Concept Planning and reported to Council indicated that a number of landowners in proximity of this area do not support urban encroachment within

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		<p>the Lewis Road locale. This was also evident through the consideration of development applications for more intensive uses on Lewis Road (namely, Places of Worship).</p> <p>See also the City's response to submission 2 for reasons why the Foothills Investigation area is recommended to no longer be pursued.</p>
<p>13.</p> <p>Main Roads</p>	<p>Roads and Noise</p> <p>City of Kalamunda Draft Local Housing Strategy 2020</p> <p>In response to your correspondence received on 9 April 2020, Main Roads provides the following comments on the City of Kalamunda's Draft Local Housing Strategy (the Strategy):</p> <p>In the Strategy, on Page 74 in Section 17.1 Transport Corridors, there is an incorrect statement about "district distributor connectors owned by Main Roads but under the management of the City of Kalamunda." This statement needs to be reviewed because there are no roads satisfying this description in the City.</p> <p><u>Road and rail noise</u></p> <p>In the Strategy, there is a brief reference to the Western Australian Planning Commission's (WAPC) State Planning Policy 5.4: Road and Rail Noise (SPP5.4). Transport related noise issues are significant amenity issues and costly to address so Main Roads would like to see more emphasis in the Strategy on the need for any housing development within the trigger distances for a transport corridor specified in SPP 5.4 to comply with the policy and policy guidelines.</p> <p>In the City of Kalamunda, applies to the freight railway, the Forrestfield-Airport Link passenger railway under construction, Row Highway, Tonkin Highway, Welshpool Road East/Canning Road as shown in Schedule 3 of SPP 5.4.</p> <p><u>Regional Roads</u></p> <p>No mention is made in the Strategy about WAPC Development Control Policy 5.1 – Regional Roads (Vehicular access) (DCP5.1). It is critical that the safe and efficient operation of the regional road network is protected into the future so Main Roads would like to see a reference to DCP 5.1 in the Strategy highlighting the need for development and property access to be achieved via local roads, rather than regional roads, wherever possible.</p> <p>AS an extension of Orrong Road, Welshpool Road East is an important regional road that is planned to become an expressway. When combined with Canning Road, it is an important heavy vehicle freight link between Perth and the Brookton on Highway for heavy vehicles servicing the Wheatbelt and other destinations east of the Perth metropolitan area. Any development, including housing, along of in close proximity to those roads needs to be done in a manner that does not impact on the safety or function of those regional roads.</p>	<p>Relevant section amended to read "As the City is experiencing multiple investigation areas which may result in increased housing and commercial precincts, the road network will need to account for increased traffic volumes and the potential effects on lane capacity and intersection level of service. In particular, on district road connectors."</p> <p>Reference to SPP5.4 added to section relating to Noise Contours. Paragraph reads "Similarly, future development proposed within trigger distances as outlined in SPP 5.4: 'Road and Rail Transport Noise and Freight Considerations in Land Use Planning' would be required to comply with the policy requirements. In some cases, noise mitigation measures may require installation of a sound wall or double-glazed windows for example, to be applied as a condition of approval in areas affected by road or rail transport noise. "</p> <p>Regional roads – the only investigation area affected by Welshpool Rd East is Crystal Brook (Wattle Grove South) and the preliminary concept plan indicates access only off existing local roads. Restricted access and referral to Main Roads is considered as standard for any development abutting a blue or red road, therefore it is not considered necessary to include in the LHS.</p> <p>Infrastructure and Servicing as a result of urban intensification – the impacts on road traffic volumes and utilities is noted. This will be addressed as part of the Local Planning Strategy anticipated to be prepared in 2021/2022. In the meantime traffic impact assessments and/or statements are required for development applications and subdivisions which are considered to impact the local or regional traffic network.</p>

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	<p><u>Strategic Infrastructure and Transport Planning</u></p> <p>Increases to housing density and development of further residential areas to achieve the additional dwelling and population targets identified in the Strategy will increase the volume of vehicle traffic using the road network. It is recommended that the City prepare a strategic City-wide Transport Study and Strategy to help identify the medium to long-term needs of the City's transport network both in terms of safety and efficiency for movement of all modes of transport and users of the network.</p> <p>Additionally, road corridors perform an intrinsic function for urban drainage and accommodate utility services to urbanised areas. The infrastructure underlying these services will often require upgrades and improvements to meet the increased demand of land use intensification.</p> <p>Identifying what transport and other servicing infrastructure is needed in the future will assist with long-term strategic and financial management and help identify the need for, and inform, Developer Contribution Plans to address development generated impacts. The preparation of a Transport Study and Strategy as well as a Servicing Plan and Strategy will also inform the proposed Community Facilities Plan mentioned in Section 3.3.3 of the City's Local Planning Scheme and future Town Planning Scheme requirements.</p>	
14.	<p>Subdivision Enquiry Gooseberry Hill</p> <p>APPLICATION FOR A CHANGE OF ZONING</p> <p>Property location: 11 lots bounded by Railway Road, Gooseberry Hill Road, Healey Place and Lenori Road in Gooseberry Hill including lot numbers 1, 2, 3, 57, 56, 500, 501, 54, 55, 58 and 59.</p> <p>Proponents: [redacted]</p> <p>Please refer to our original submission dated 28th April 2020.</p> <p>I refer to the City's reply dated 14th May 2020 and respond to the statements as follows:</p> <p>1. The land in question is not consistent with the City's endorsed Local Planning Strategy and Local Housing Strategy. <i>The City recognises it has a changing and ageing population and many within the community that will want to age in place and remain within the City well into retirement. It is the City's goal to identify opportunities for people to stay whilst facilitating the necessary and appropriate housing forms to accommodate this trend.</i></p> <p>By rezoning the area, the two lots being Lot 56 and 57 will each be able to be subdivided into two smaller lots of approximately 1000m² that when developed with smaller sized homes will enable the current residents to effectively "downsize" and so remain in the</p>	<p>Noted.</p> <p>At this stage the City is anticipated to meet infill dwelling targets with existing investigation areas, therefore low density subdivision in this area is not supported for a number of reasons including the following aspects:</p> <ul style="list-style-type: none"> a) This submission proposes re-zoning which is outside an identified investigation area; b) The sites are not within an 800m walkable catchment distance of the Kalamunda Activity Centre; c) The area does not have a sewer connection; d) The sites are located in a Bushfire Prone area and; e) The proposed R10 would be inconsistent with the surrounding R5 residential lots west of Railway Road.

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	<p>area for the foreseeable future, thus freeing up the existing larger homes for younger families as per the policy.</p> <p><i>'Kalamunda, Gooseberry Hill and Lesmurdie are predicted to have the greatest rise in young families and the elderly'</i></p> <p>2. Railway Road provides clear delineation between the R10 area to the east of Railway Road and the R5 coded area to the west of Railway Road. There are no R10 coded areas in the area surrounding the subject lots.</p> <p>Having roads serve to delineate is a common occurrence throughout the Kalamunda area, however not only do they separate different R code areas but also divide areas with the same coding. It can be said that the band of R10 lots East of Railway Rd effectively join the subject lots to the West in the same way. The situation that there is in effect a boulevard separating the two areas rather than a single road is inconsequential in the scheme of things. 11 lots (or 13) is a reasonable cluster by comparison.</p> <p>3. There is insufficient planning justification provided for the City to fully consider your request.</p> <p>As with many of the subdivisions, this superblock was part of a greater sub-division that was created pre-1980 and prior to the R Codes being introduced. Of the 11 lots, 8 of them are well undersized under the current zoning. It was perhaps the whim of the developer at the time not to divide lot 56 and 57 and the end result could be called disorderly. Lots 1 and 2 were part of the sub-division and it is only recently that lot 1 has been built on.</p> <p><i>It is acknowledged that urban infill and meeting density targets is a State Government priority, however the type and quality of infill development does have an impact on character. Character being a combination of streetscape and architecture.</i></p> <p>The current streetscape on Healey Place can be likened to a wide set of teeth with two missing at the front, as lots 56 and 57 are undivided, the backyards are exposed and abut the street. A change in zoning would allow for the subdivision of the two lots and building of homes that would complement the area and effectively make the streetscape unbroken in appearance. As far as the architecture is concerned the City would have the ultimate say in what was built. The sub-division of these lots would certainly meet the criteria for the Government's infill policy.</p> <p>With regard to sewer, State planning has reduced the lot size of 2000m2 down to 1000m2 for sub-division without a direct connection to the City's sewer providing that a modern treatment system is utilised. This effectively removes the previous barrier to rezone the area from R5 to R10.</p> <p><i>The Draft Government Sewerage Policy was prepared in 2017 to reflect the improvement in effluent treatment systems and was formally adopted in 2019. The Government Sewerage Policy 2019 is operational from 23 September 2019. One of the key changes to the Government Sewerage policy include subdivision to an average lot size of 1,000m2 where effluent disposal can be contained onsite and it is in accordance with the zoning.</i></p>	
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	<p>4. The proposal is considered ad hoc and not in accordance with the principles of orderly and proper planning given the lack of strategic context.</p> <p>I am sure there are numerous examples of ad hoc segments from previous planning schemes that have resulted in zoning changes over the years. The area encircling the corner of Blamire and Canning Roads appears to be a case in point as is the single R5 block on Orange Valley Road. There are other examples of R10 blocks encompassed by 4 roads with only 4 lots (Lewis and Guppy for example)</p> <p>I believe that I have demonstrated that far from being ad hoc, the proposal to rezone the 11 lot super-block and subsequent sub-division, completes the jigsaw and in effect, tidies up the streetscape while meeting the objectives in the City's Local housing Strategy.</p> <p>A further benefit for the City would be the annual rates generated in perpetuity if the two lots are sub-divided.</p> <p>It would be informative for the City to visit the site from the Healey Place perspective.</p> <p>We would be grateful if the city would give kind consideration to this proposal.</p> <p>[redacted] 16th July 2020 2 Attachments</p> <p>For more information refer to <i>Appendix viii. Gooseberry Hill submission</i> attached.</p>	
15. City of Gosnells	<p>The City of Gosnells provides the following submission on the City of Kalamunda Local Housing Strategy.</p> <p><u>8.2 Wattle Grove South – WAPC Urban Expansion and Investigation Area</u></p> <p>This precinct adjoins the municipal boundary with the City of Gosnells (City) and the suburb of Orange Grove.</p> <p><u>Local Planning Strategy</u></p> <p>The City's has adopted a new Local Planning Strategy that is currently being advertised for public comment.</p> <p>Land to the south of Precinct 8.2 Wattle Grove South, is designated as a Potential Urban Expansion Area. Residential development is anticipated to occur in the long term (10-15 years) due to the need for regional/ local structure planning, rezoning of the land and extension of services to the area.</p> <p>The Strategic planning framework for both local government areas is consistent with the State Governments regional planning framework for the foothills area.</p> <p><u>Foothills Rural Strategy</u></p>	<p>Noted.</p> <p>Interface of any investigation areas abutting the boundary to Gosnells should take account of adjoining zoning and land uses.</p>

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	<p>Council's Foothills Rural Strategy covers the Orange Grove area and includes two Rural Planning Precincts.</p> <p>Rural Planning Precinct 3 (Tonkin Highway East) is located to the east of Precinct 4 and includes Valcan Road and the boundary of the City of Kalamunda.</p> <p>The planning objectives of this Precinct are:</p> <ol style="list-style-type: none"> 1. Protect, conserve and enhance the landscape character of the Precinct. 2. Protect, conserve and enhance the natural environment in the Precinct. 3. Protect drinking water resources in the Precinct and adjacent reserved areas. 4. To protect and manage land uses within the Precinct. 5. Maintain an adequate level of bush fire protection. <p>Rural Planning Precinct 4 (Kelvin Road Precinct) is bounded by Tonkin Highway, Kelvin Road, the end of Valcan Road and the boundary of the City of Kalamunda.</p> <p>Precinct 4 creates a more flexible approach to land use and development and supports a variety of land use activities that are commercial in nature.</p> <p>The planning objectives of this Precinct are:</p> <ol style="list-style-type: none"> 1. Minimise detrimental impacts on the amenity of the locality acknowledging the lesser amenity values of the Precinct compared to the broader Foothills area. 2. Provide a flexible approach to land use having regard to the historical development of the Precinct with rural-industrial type land uses. 3. Maintain an adequate level of bush fire protection. 4. Discourage amendment proposals that are not compatible with future urbanisation of the Precinct. <p>Most of the land on the northern side of Kelvin Road is owned by Council and is a former waste disposal site. The City is progressing with plans to develop the land as a new Council depot, public open space and a rural-residential subdivision.</p> <p><u>Town Planning Scheme No. 6</u></p> <p>Land to the south of the municipal border is zoned General Rural in the City's Town Planning Scheme No. 6. An Additional Use also exist over a portion of the land for Land Fill, Gas Extraction and Control Activities.</p> <p><u>Draft Local Planning Scheme No. 24</u></p> <p>The City's has adopted a new Local Planning Scheme that is currently being advertised for public comment. Land in Orange Grove is zoned Rural in LPS 24.</p> <p>An Additional Use exists over a portion of the area for a Waste Disposal Facility, Waste Storage Facility and Light Industry.</p>	
16. Department of Fire and Emergency Services	<p>Dear Sir/Madam,</p> <p>I refer to your email dated 14 April 2020 in relation to the referral of the City of Kalamunda Draft Local Housing Strategy 2020-2025 (Draft Strategy).</p> <p>It is unclear from the documentation provided if the City of Kalamunda has applied <i>State Planning Policy 3.7 – Planning in Bushfire Prone Areas</i> (SPP 3.7) to this proposal. Section 18.5 identifies that <i>the entirety of the rural area of the City is designated as bushfire</i> prone. It is further noted that</p>	<p>BMP's are required for all Structure Plan, Amendment and subdivisions in Bushfire Prone Areas as standard.</p> <p>Noted that DFES does not support Pickering Brook townsite expansion investigation areas.</p>

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	<p>bushfire risk is specifically referenced for some of the Investigation Areas (such as Pickering Brook Townsite Expansion).</p> <p>Given the Draft Strategy seeks to intensify residential development in a number of Investigation Areas, it provides an opportune mechanism for the coordination of bushfire risk. SPP 3.7 seeks to reduce vulnerability to bushfire through the identification and consideration of bushfire risks in decision-making at all stages of the planning and development process.</p> <p>A Bushfire Management Plan (BMP) is required to accompany strategic planning proposals, subdivision and development applications in areas above BAL-LOW or areas with a bushfire hazard level above low (refer to clause 6.2b). A BMP includes the bushfire assessment, identification of the bushfire hazard issues arising from the relevant assessment and a clear demonstration that compliance with the bushfire protection criteria contained within Appendix 4 of these Guidelines, is or can be achieved.</p> <p>BMP's should be prepared for Investigation Areas (if not already) as early as possible in the planning process and progressively refined or reviewed as the level of detail increases. The level of detail provided within a BMP should be commensurate with the applicable planning stage and scale of the proposal or application.</p> <p>DFES takes this opportunity to reiterate its position as outlined on 23 February 2020 regarding the proposed Pickering Brook MRS Scheme Amendment - that the Amendment is not supported due to extreme fire hazard.</p> <p>Should you apply SPP 3.7 then, we request the relevant information pursuant to this policy be forwarded to DFES to allow us to review and provide bespoke comment prior to the City endorsement of the Strategy.</p> <p>Land Use Planning staff are available to discuss planning proposals and provide general bushfire advice at any stage of the planning process. Please do not hesitate to contact me on the number below, should you require clarification of any of the matters raised.</p>	
17. City of Swan	<p>We have assessed the draft Housing Strategy and believe that it will not directly impact on development in the City of Swan. We accordingly have no objection to the proposals in the City of Kalamunda's Draft Local Housing Strategy.</p>	Noted.
18. Department of Water and Environmental Regulation	<p>CITY OF KALAMUNDA DRAFT LOCAL HOUSING STRATEGY</p> <p>Thank you for providing the above referral for the Department of Water and Environmental Regulation (Department) to consider.</p> <p>The Department has identified that the draft Local Housing Strategy has the potential for impact on water values and management. While the Department does not object to the proposal, key issues and recommendations are provided below and these matters should be addressed:</p> <p>The Department has identified a number of water issues across the following investigation and expansion areas. These issues will need to be investigated at future planning stages.</p>	Noted.

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	<p>Pickering Brook Townsite Expansion</p> <p>The Department has had ongoing consultation regarding the Pickering Brook Townsite Expansion. There are a number of significant water issues that must be overcome to allow the future development of this site.</p> <ul style="list-style-type: none">· The proposed future development is situated within the Middle Helena Public Drinking Water Source Area and is managed for Priority 2 (P2) source protection. P2 source protection areas are defined to ensure that there is no increase in risk of pollution to the water source. P2 areas are declared over land where low intensity development (such as rural) already exists. Protection of public water supply sources is a high priority in these areas. P2 areas are managed in accordance with the principle of risk minimisation and some development is allowed under specific guidance.· The Department has advised that it conditionally supports the concept of the townsite expansion and acknowledges the possible local strategic need for some additional housing within the townsite location. However, The Department is clear that conditions would need to be adequately met to satisfy concerns associated with contamination of the drinking water catchment, as the proposal does not meet current public drinking water source areas policy. Additionally, the Department would further take into consideration the need for the townsite expansion if it is recognised as a State Government priority.· Suitable wastewater treatment will be required. This area is currently unsewered and as such, future development will need to comply with requirements outlined in the Government Sewerage Policy (2019).· A minor waterway traverses the site. Appropriate setback and protection of the waterway in accordance with Operational Policy 4.3: Identifying and establishing waterways foreshore areas (DWER, 2012) will need to be provided for any future development. <p>Wattle Grove South</p> <ul style="list-style-type: none">· Crystal Brook flows through the northern portion of the area. Appropriate setback and protection of the waterway in accordance with Operational Policy 4.3: Identifying and establishing waterways foreshore areas (DWER, 2012) will need to be provided for any future development.· Suitable wastewater treatment will be required. This area is currently unsewered and as such, future development will need to comply with requirements outlined in the Government Sewerage Policy (2019).· There is currently limited groundwater available for licencing in this area. Public Open Space requirements will need to seek a groundwater allocation, if available, or source alternative water sources. <p>Forrestfield North Project Area</p> <ul style="list-style-type: none">· The proposed Forrestfield North residential precinct is bound by Poison Gully to the north. Appropriate setbacks and waterway protection and management will be required.	
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	<p>· Suitable wastewater treatment will be required. This area is currently unsewered and as such, future development will need to comply with requirements outlined in the Government Sewerage Policy (2019).</p> <p>· There is currently limited groundwater available for licencing in this area. Public Open Space requirements will need to seek a groundwater allocation, if available, or source alternative water sources</p> <p>Heidelberg Park Project Area</p> <p>· The Department has previously advised that due to the limited water issues on this site, a District Water Management Strategy will not be required to support the rezoning of the land.</p> <p>· Suitable wastewater treatment will be required. This area is currently unsewered and as such, future development will need to comply with requirements outlined in the Government Sewerage Policy (2019).</p> <p>Maida Vale South</p> <p>· Crumpet Creek flows through the northern portion of the area. Appropriate setback and protection of the waterway in accordance with Operational Policy 4.3: Identifying and establishing waterways foreshore areas (DWER, 2012) will need to be provided for any future development. Suitable wastewater treatment will be required. This area is currently unsewered and as such, future development will need to comply with requirements outlined in the Government Sewerage Policy (2019).</p> <p>· There is currently limited groundwater available for licencing in this area. Public Open Space requirements will need to seek a groundwater allocation, if available, or source alternative water sources. Environment issues have not been considered at this point, however will need to be investigated at subsequent stages of the planning process.</p>	
19.	<p>Statistics and Wattle Grove</p> <p>DRAFT LOCAL HOUSING STRATEGY</p> <p>General Comments:</p> <p>Statistical Relevance</p> <p>It is always difficult to ensure the relevancy of a document based on ever changing statistics. However, we note that the Reference List does not show that consideration has been given to the land availability statistics contained in the government publication, Urban Monitor 11, issued in January 2020.</p> <p>This document provides a 'whole of metropolitan' area context with respect to the current and projected land available for housing in the metropolitan area. It would seem important therefore, to ensure that the key points in <i>Urban Monitor 11</i> are reflected in the draft <i>Local Housing Strategy</i>.</p> <p>Planning for Pandemics</p> <p>The Covid 19 pandemic is having had a huge social and economic effect on the world. According to media and medical reports, it would be unrealistic to expect this kind of medical emergency- accompanied by long periods of exclusion- to be a one-off event.</p>	<p>Urban Growth Monitor 11 Report (January 2020) is a high-level assessment of land availability within the Perth metropolitan area. While useful to Landgate and DPLH, it is less relevant to the City as LHS targets are based off the North-East Sub-regional Planning Framework. The City has included an analysis of the DPLH State Lot Activity for Kalamunda which is included in the estimated dwelling targets.</p> <p>Western Australia due to the geographic isolation and population density has been fortunate to be less affected than other Australian states by the COVID-19 pandemic. While housing design can have an impact, for example minimising transmission through shared spaces such as elevators, it is more reliant on hygienic use, cleaning regimes, education and human behaviour. In this case planning would have limited influence, as use of buildings relates more to architectural design.</p> <p>Ancillary dwellings are already a permissible use on residential and rural lots greater than 450m².</p>

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	<p>Therefore, City planners ought to factor into the local Housing Strategy the need for geographically spaced dwellings and for public open space within walking distance of dwellings, to assist in preventing the future transmission of viruses, particularly for the more vulnerable members of the community, including the elderly.</p> <p>By way of further illustration of this point, the Financial Review published on the 8 April 2020 contained an article in which Professor Gary Geelhoed, Executive Director of the Western Australian Health Translation Network said that, <i>“The traditional suburban quarter-acre block has played an important role in keeping the death rate from COVID-19 relatively low in Australia. He said, “the layout of the nation’s suburbs is an advantage when trying to cut the rate of new infections.”</i></p> <p><i>“Just look at the streetscape of cities and towns of Italy and compare it to the average Australian suburban streetscape – the difference is obvious,” Professor Geelhoed said.</i></p> <p><i>“Australia’s vast open spaces, its “sweeping plains”, are also important because they allow for a population density of about 3 people per square kilometre compared to Spain’s, 91 and Italy’s, 206”.</i></p> <p>The draft <i>Local Housing Strategy</i> needs to be updated to take account of pandemic risk management with respect to residential planning.</p> <p>Unlike inner City local government authorities, the City of Kalamunda does have the opportunity to factor in the need for reduced urban intensification across the City and to market the City as a ‘a safe haven’.</p> <p>Ancillary Dwellings</p> <p>Whilst we note that the draft <i>Local Housing Strategy</i> explores the use of alternative style dwellings, including ‘tiny houses’ which may interest a very small minority of residents, we believe that more publicity should be afforded to promoting ‘ancillary dwellings’ on residential properties as this provision is already governed by City of Kalamunda policy. ‘Ancillary dwellings’ are useful for intergenerational considerations but also, can be rented under current taxation policy.</p> <p>Specific Comments re Wattle Grove South</p> <p>Firstly, with reference to that section of the draft <i>Local Housing Strategy</i> identified below;</p> <p>8.2 Wattle Grove South –WAPC Urban Expansion and Investigation Area</p> <p>The text for this inclusion within the draft <i>Local Housing Strategy</i> omits relevant facts and therefore, misrepresents the true situation. It ought to be amended (see additional wording appearing in red typeface below) to read as follows:</p> <p>8.2 Wattle Grove South – WAPC Urban Expansion and Investigation Area</p> <p>The Framework has identified a significant portion of an area in Wattle Grove, known by project name as Wattle Grove South, as an Urban Expansion area / Investigation area (refer Fig 3) sometime after 2022 . This area is currently zoned ‘Special rural’ under the Local Planning Scheme.</p> <p>The Framework cautions that further detailed planning is required for areas identified as Urban Expansion and Urban Investigation prior to consideration for any urban intensification. In particular, planning must establish whether the identified area contains significant environmental attributes.</p>	<p>Wattle Grove South (Crystal Brook) Investigation Area was determined by Council in November 2020. The Housing Strategy has been updated to reflect the latest information in this respect.</p> <p>The Current Subdivision map shows all properties which have subdivision potential under the current zoning and is therefore accurate.</p>
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	<p>Where significant environmental attributes are identified, the Framework states that further planning for these sites will need to prioritise avoidance or protection, or both, of the environmental values.</p> <p>Importantly, the Framework also states that the classification of existing special rural zoned areas as Urban should not however, be construed as support for the further development of these areas at a higher density.</p> <p>Similarly, the Framework states that the classification of Urban Investigation areas is not to be construed as a commitment by the WAPC to support any rezoning, as this too, will depend upon the outcome of further planning investigations.</p> <p>In July 2018, the Council considered a preliminary feasibility investigation over the area to determine the appropriate path forward for future planning, technical investigations and community consultation.</p> <p>In February 2019, the Council resolved that the City would not consider any industrial land use outcomes for the area and would seek instead, to establish the level of community support for various aspects of possible future land use related to retaining landscape characteristics and vistas maintaining ecological linkages and reflecting existing lifestyle and recreational opportunities of the area. Further to the Council decision, the area for analysis was also expanded slightly to include some properties north of Welshpool Road east (refer Fig 4).</p> <p>Depending on the outcomes of community consultation, environmental investigations, concept planning and future approval of the WAPC, the preparation of a Strategic District Structure Plan may be initiated.</p> <p>The desktop projections contained in the draft Local Housing Strategy which appear in italics below, pre-empt the fact that the WAPC has not finally determined that any urban intensification is warranted in this area or, if intensification is approved, any conditions which may apply, including protection of any environmental values . Similarly these desktop projections also appear to pre-empt or influence the outcome of ongoing community consultation processes about future land use in the area and therefore, ought to be deleted.</p> <p>We note also, that none of the other sections of the draft <i>Local Housing Strategy</i> dealing with current investigation areas contain pre-emptive scenario predictions as below</p> <p>[DELETE] <i>Wattle Grove South desktop projections based on 280ha (400ha minus 30% equal to 120ha for roads, POS and drainage).</i></p> <p><i>Scenario 1: Estimated 15 households per hectare and 2.6 persons per dwelling = 4200 households = 10,920 persons</i></p> <p><i>Scenario 2: Estimated 10 households per hectare and 2.6 persons per dwelling = 2800 households = 7280 persons</i></p> <p><i>Scenario 3: Estimated 5 households per hectare and 2.6 persons per dwelling = 1400 households = 3640 persons</i></p> <p><i>Scenario 4: Estimated 2 households per hectare and 2.6 persons per dwelling = 560 households = 1456 persons .</i></p>	
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	<p>Map on Page 131.</p> <p>That section of the map on page 131 which applies to the area with the project name of Wattle Grove South either needs to be removed entirely with the area being left blank or alternatively, modified as described below, as it is not accurate with respect to current lot sizes which have subdivision potential .</p> <p>The Map contains a sentence which states that the map <i>shows’ the subdivision potential based on minimum lot size as defined by Local Planning Scheme No 3’</i></p> <p>There is no map in <i>Local Planning Scheme No 3</i> which delineates this depicted distinction with respect to Wattle Grove South. In addition, the text describes this ‘special rural’ zoned area as ‘urban investigation’. Whilst the text in the Scheme states that with respect to special rural areas at “5.9.1 Subdivision of land</p> <p><i>a) Subdivision in Special Rural zones shall not create lots less than 1 hectare in area “</i></p> <p>the reality is that the City has already permitted at least 61 lots of 2000 square metres zoned ‘special rural’ in Wattle Grove South. In other words about 25 % of the study area consists of special rural properties of 2000 square metres.</p> <p>As the Government Sewerage Policy states that lot sizes in areas without reticulated sewerage ought not be smaller than 2000 square metres, if any delineation of subdivision potential for this area is required for the purposes of this map, based on past precedent, it would be to identify all of the lots that are above 2000 square metres as being potentially subdivisible and not the inaccurate delineation depicted in this map with respect to Wattle Grove South.</p> <p>End of Submission</p>	
20. Perth Airport	<p>For more information refer to <i>Appendix ix. Perth Airport submission attached.</i></p>	Modifications made to relevant sections of LHS.