Submitter Number	Comment	Applicant Response
1.	Request for documents	Provided
2.	I have no objections to the proposals. My only concern was whether there would be a new entry into the area and whether it would cause any problems. It did take me for ever to search through the article to find it but from what I can tell the only new entry will be from Hale Rd just a little west of the existing entry and I can see no problem with that. I understand that Woolworths Drive is still a private road. At some time in the future arrangements will need to be made to upgrade this road. Even now sometimes there is a backlog of cars entering Woolworths Drive due to a driver wanting to turn right into the driveway adjacent to the chemist or even McDonald's further along. The apparent round-a-bout near the entry to the community centre will help. Maybe widening Woolworths Drive from Hale Rd to this round-a-bout would help too, although the drawing does appear to do away with the chemist entry from Woolworths Drive and this would also help. As you can see from my address, I live across the road from Woolworths Drive - adjacent to that bl..dy round-a-bout - so I would have better observation of this road than anybody. Oh by the way I have never been able to sit out the front, having morning tea for around half an hour, without seeing at least one incident of a vehicle incorrectly failing to give way to their right at this round-a-bout.	Any new entry way/road realignment will be assessed as part of the development application for the associated building(s) and will be considered in terms of the local road network and expected trip generated by the development type.
3.	We respectfully request that the City recommends Council do not progress SA 109 for the reasons discussed herein. It is understood that SA109 is a City-led proposal, which seeks to rezone the subject site 'District Centre'. The accompanying LUA contemplates four concept development options and determines that 'Option A' represents the highest and best use of the land. 'Option A' contemplates an additional 6,900m² net floorspace area. It is noted that neither the City or any future landowner, are not bound to develop the subject site as contemplated under 'Option A'. This is of genuine concern considering the subject site measures approximately 18,000m² and	A detailed response to the submission with expert advice is also provided in Attachment 4. Note the indicative land use mix for all options is expressed as a gross lettable area (GLA). Option A provides for an additional 6,900 GLA.

	can accommodate a commercial floorspace area much greater than the envisaged net floorspace area. Notwithstanding the above, the immediate concern with SA 109 is that it precedes both the detailed site planning of the subject site and the orderly and proper planning of the broader Forrestfield District Centre, as foreshadowed within the relevant planning frameworks. This is discussed further herein. *Orderly and Proper Planning* There is genuine concern that SA 109 is inconsistent with the principles of 'orderly and proper planning' as it represents a significant departure from an established and agreed process. Upon detailed review of the relevant planning framework, it has been identified that the preparation of SA 109 circumvents the orderly and proper planning for the subject site and its surrounds and is characteristic of ad hoc planning. Namely, it precedes the preparation of necessary precinct structure planning, as foreshadowed within the City's own Local Planning Strategy (2021), Activity Centre Strategy (2021) and Forrestfield District Centre Structure Plan (2012). This omission has resulted in a Scheme Amendment which evades the resolution of the following matters: • the interface of the subject site with adjoining areas of natural amenity which warrant protection (i.e., Woodlupine Brook); adjoining residential areas (west) and adjoining commercial areas (east and north); • the management of noise, traffic movements and waste management considering the subject sites direct interface with adjoining low-density residential areas; • the proposed zoning, in the absence of any structure planning, will enable land use activities which are also capable of occurring within the activity centre 'core', and so does not adequately reflect the intended role of the subject site in its wider precinct setting (i.e., 'redevelopment	Orderly and Proper Planning The City considers that it has met the objectives of the planning framework applicable to this centre and that the amendment is consistent with the principles of orderly and proper planning. The Activity Centre Strategy 2021 speaks to 'major development' as the determining factor in the requirement for a Precinct Structure Plan being prepared. The Forrestfield District Centre Structure plan (FDCSP) speaks to 'comprehensive site plans' and a 'retail sustainability/needs assessment study' for major development of a commercial nature. 'Major Development' as defined in SPP4.2 and Draft SPP4.2 requires a net additional floorspace of >5000m² NLA. It is appropriate for the city to reduce the gross land use area commensurate with the area occupied by the existing community services in light of its ongoing commitment to the provision of services in the area.

	of the site with an envisaged development mix consisting of an integrated health / community hub and showroom development); and • development controls to guide the future built form and scale of buildings and to protect the relationship between buildings (Le., particularly low-density residential, east of the subject site) and between buildings and the public realm (i.e., Woodlupine Brook). Considering the above, we respectfully request that the City recommend Council do not progress SA 109 until such time as the necessary precinct structure planning for the subject site has been undertaken. *State Planning Policy 4.2 Activity Centres for Perth and Peel* State Planning Policy 4.2 Activity Centres for Perth and Peel (SPP4.2) specifies broad planning requirements for the redevelopment and renewal of existing centres in Perth and Peel. Under clause 6.4(1), it prescribes precinct structure plans (fmr. activity centre structure plans) need to be prepared for district centres. This requirement has also been carried forward into draft State Planning Policy 4.2 Activity Centres (draft SPP4.2). The City distinguishes, in the Amendment Report, that a precinct structure plan is required to be prepared for district activity centres prior to a 'major development' being approved. It is acknowledged that this observation is generally consistent with the provisions of both the current SPP4.2 and draft SPP4.2. However, the Amendment Report suggests that SA 109 does not represent 'major development' as the envisaged net floorspace area (as depicted under 'Option A') includes 2,950m2 of community uses, which are not considered 'major development' under either SPP4.2 or draft SPP4.2. On this basis, the City suggests that it is not required to prepare a Precinct Structure Plan. The City's conclusion in this respect is not supported, as there is	• State Planning Policies (SPP2.9), Local Planning Scheme 3 requirements and Local Planning Policies (LPP33 – tree retention and Draft LPP34 – Wetlands and Waterways) provide provisions to advise and control the Woodlupine Brook Interface along with ongoing support works being undertaken by Water Corporation, the City of Kalamunda and the Friends of Woodlupine Living Stream. • Noise, traffic and waste management are currently assessed under LPS3 requirements. DRP assessment provide an additional safeguard in the area of built form design. • The rezoning can facilitate additional land uses, notwithstanding that the LUA and impact test have foreshadowed the lack of financial return in land uses which would directly compete with the established core. The assessment highlights how the integrated health and showroom development would align with the community hub proposal with is a stated City commitment. • Development controls in the LPS3 with input from the DRP have the capacity to control-built form interfaces. *State Planning Policy 4.2 Activity Centres for Perth and Peel* The City has established its commitment to the provision of ongoing community services on site which reduces the lot's capacity to be developed to a level considered as below that of 'Major development' offsetting the requirement for the provision of a precinct structure plan as set out in SPP4.2 and Draft SPP4.2.

	no certainty that 'Option A' will be what is ultimately developed on the subject site. The City's Activity Centre Strategy (2021) projects the Forrestfield District Centre will experience gradual increase in floorspace until 2036 (expanding to between 17,000m2 - 20,000m2). Yet, based on 'Option A', SA 109 will enable rapid expansion of the activity centre to at least 19,856m2. SA 109 will enable this expansion to occur much earlier than anticipated or planned for (Le., 2036). As such, there is genuine concern that the ultimate commercial floorspace of the Forrestfield District Centre could be much more than 20,000m2. This is realised when considering the subject site measures approximately 18,000m2 and can accommodate a commercial floorspace area much greater than 6,900m2, as suggested under 'Option A'. In the absence of orderly and proper planning, 'major development' on the subject site could threaten to erode the recognised activity centre hierarchy. On this basis, we respectfully request that the City recommend Council does not progress SA 109 until such time as the necessary precinct structure planning for the subject site has been undertaken. At the very least, the City should recommend Council impose floorspace restrictions over the subject site given SA109 has been predicated 'Option A'. *Type of Amendment (Standard vs. Complex)* The City suggests, in the Amendment Report, that the proposed amendment is a 'Standard Amendment' as it satisfies r.34 of the Planning and Development (Local Planning Schemes) Regulations 2015 (the Regulations). The City's conclusion in this respect is not supported, as the proposal is not consistent with the relevant planning framework (as detailed above; refer to	The FDCSP adopted in 2012 speaks to the existing centre having a NLA of 12,044m2, when reassessed as part of the ACS 2021 this rate had increase to just 12,956m2. This amounts to a low level of interest in lot rationalisation or redevelopment. The City's objectives stated in the FDCSP are contained in Section 1.5 and include the following in relation to land uses and activities: • To support a wide range of retail and commercial premises and to promote a competitive retail and commercial market; • To support the provision of appropriate civic and community facilities which will increase the broad appeal and multi-faceted nature of the Centre; • To increase the range of employment opportunities, which will in turn contribute to the achievement of sub- regional employment self-sufficiency; • To increase the density and diversity of housing in and around the Centre to improve land use efficiency, housing variety and choice, and to support Centre facilities; and • To ensure the Centre provides sufficient development intensity and land use mix to support higher frequency public transport. The proposed amendment is considered to be consistent with the above objectives, particularly as it will provide opportunity to enhance the range of retail and commercial premises, as well as civic and community

	'Orderly and Proper Planning'). On this basis, we respectfully request that the City recommend Council do not progress SA 109 until such time as the necessary precinct structure planning for the subject site has been undertaken. Conclusion This submission, prepared on behalf of Perron, demonstrates that SA109 circumvents the orderly and proper planning for the subject site and its surrounds and is characteristic of ad hoc planning. On this basis, we respectfully request that Council do not progress SA 109 for the following reasons: • it precedes the preparation of necessary precinct structure planning, as foreshadowed within the City's own Local Planning Strategy (2021), Activity Centre Strategy (2021) and Forrestfield District Centre Structure Plan (2012); • it does not consider the interface of the subject site with adjoining areas of natural amenity which warrant protection (Le., Woodlupine Brook); adjoining residential areas (west) nor adjoining commercial areas (east and north); • the proposed zoning will enable land use activities which are also capable of occurring within the activity centre 'core', and so does not adequately reflect the intended role of the subject site in its wider precinct setting (Le., 'redevelopment of the site with an envisaged development mix consisting of an integrated health / community hub and showroom development); • there are no development controls to guide the future built form and scale of buildings or to protect the relationship between buildings and between buildings and the public realm (i.e. Woodlupine Brook); and • neither the City, nor any future landowner, are bound to develop the land as shown in 'Option A'. As such, it can facilitate major development and can potentially undermine the activity centre hierarchy.	facilities, increase the range of employment opportunities and improve land use efficiency. All options explored reinforce the City's commitment to providing a community facility of at least 2950m². The Strategic Communities Facilities Plan (The Big Picture) is currently being advertised for public comment and identifies the site as a desired location for increased community service provision which negates the capacity to facilitate additional NLA floorspace. The City considers it is appropriate that the floorspace calculations consider the existing and ongoing community use component of the lot which is not captured in the definition of 'activity centre use(s)' as defined under Clause 7.2 of Draft SPP4.2. The available floor space for development, considering the City's commitment to the continues community services provision, falls below the established 'Major development' threshold, negating the need for a precinct structure plan.

4.	We strongly object to the rezoning of the subject site to District Centre. It is considered the rezoning proposal is ad-hoc in nature and has been prepared with no consideration to the potential impacts on the existing Forrestfield Centre. Whilst the City has stated the proposal is not considered a 'major development', there have been no attempts made within SA109 to mitigate this potential risk to Hawaiian's Forrestfield given the significant development potential of this subject land parcel. There is also limited evidence provided where the proposed rezoning has been considered in a significant level of detail by State and/or local planning framework. For these reasons it is deemed that the rezoning of the subject site is inappropriate and should not proceed until further detailed planning is undertaken. Importantly, the centre performance and productivity of Hawaiian's Forrestfield does not demonstrate that any additional retail floorspace would be necessary or reasonable in this location and has the potential to materially negatively impact Hawaiian's Forrestfield. *SCHEME AMENDMENT 109* We understand the purpose of SA 109 is to provide for future redevelopment of the site with an envisaged mix of land uses being contemplated for the site. The City's Amendment Report states: "the proposed amendment consolidates the existing activity centre uses and recognises the site as being within the logical confines of the activity centre, in line with its designation as a District Centre. " The subject site is owned by the City and has a total land area of approximately 18,000m2. It is understood the site currently contains an existing family service centre with the remainder of the site being vacant. The mix of land uses and redevelopment options for the site have been supported by a Land Use Assessment undertaken by Urbis. The Land Use Assessment completed by Urbis considered four (4) options for the site which explored a range of different land uses. This included a bulky	A detailed response with expert advice to the submission is also provided in Attachment 4. See response 3 above. The LUA framework was predicated on exploring land uses which were compatible with and enhanced the existing Hawaiian Forrestfield Commercial Centre Core. The LUA refined the proposed land uses in consideration as outlined above of the City commitment to support and enhance the existing core offerings. Impact assessment The impact assessment methodology outlined: Because an impact assessment forecasts how groups of people are likely to alter their shopping behaviour in response to a given change in the competitive environment, it is not possible to estimate individual retailer impacts or each group of retailers in each location. Therefore, in any impact assessment of this type it is not possible to estimate impacts on any specific individual retailer. The impact on anyone individual retailer or any small group of retailers in a given location would depend on many factors (e.g. retailer profitability), some of which are within their control. The actions which each of these retailers take will determine the eventual impact on each, and furthermore the actions which they each take will also determine the eventual impact on the other retailers involved. State Planning Policy 4.2 along with the City's zoning table provide guidance on potential land use. While the

	goods showroom, a supermarket and a health hub. The results from the Land Use Assessment determined that the bulky goods showroom option (i.e., 'Option A'), was most desirable to combine with the community services. Following Option A's selection, Urbis completed an Impact Test to ascertain the level of potential impact on surrounding Centres as well as providing a supporting concept plan to demonstrate how development could be coordinated across the site. It is noted the Impact Test only assessed Option A. The immediate concern with SA 109 is that there is no certainty provided that Option A will proceed. The land parcel has a significant developable area and despite the concept plan, could easily accommodate a development which exceeds the areas stipulated as part of the Land Use Assessment. This concern is further exacerbated by the fact the City is proposing to rezone the entire 18,000m2 land parcel to District Centre without a recent strategic planning framework in place to guide development and land use within the District Centre. The Impact Test provided should have assessed all four (4) options contemplated for the site as there is nothing to prevent the City or other party from proceeding with an alternative option of which hasn't been contemplated as part of the strategic planning for the District Centre. Whilst a Development Application would still need to justify an increase in commercial floorspace, by supporting the rezoning to 'District Centre' the City is effectively enabling this format of development to occur through the scheme amendment which needs to be assessed upfront at the rezoning stage. If the Impact Test determined that a higher degree of commercial floorspace for the subject site is excessive or has a detrimental impact to Hawaiian's Forrestfield, it may be determined that rezoning the entire site to District Centre is excessive. Therefore, rezoning an 18,000m2 land parcel to District Centre is too vast particularly given the limited statutory guidance on what is appropriate for this site.	potential floor space could be larger, that potential is restricted by the City's ownership of the land and the current and ongoing commitment to the provision of community services. The Impact test clearly states that this unlikely based on a multiple of influencing factors. Activity Centre Strategy The ACS outlines that growth many be favourable in the Forrestfield District Activity Centre to at least the appropriate size of a district activity centre (20,000m²). A consolidation of potential land (including vacant land) would serve to open opportunities for further investigation and support the predicted population growth.

	It is also dismissed that the District Centre zoning is a logical extension of the existing District Centre. Whilst the site is within the Forrestfield District Centre and forms part of the 2012 Forrestfield Activity Centre Plan, it doesn't mean that zoning the site to District Centre is appropriate. This will be expanded upon in the planning framework sections below. The District Centre zone currently is already extensive applied to a vast majority of landholdings (approximately 85,000m2 in land area). Through a coordinated development approach, the Forrestfield District Centre could substantially increase the floorspace beyond what has been already contemplated in the Activity Centre Strategy (ACS) based on the availability of land. Proposing to increase the District Centre land area by a further 18,000m2 via this scheme amendment is a substantial contribution and needs to be considered in a more holistic manner through a strategic planning process. This is particularly important as the subject site could theoretically accommodate a much larger commercial development than what has been contemplated. The extent of floorspace that could be accommodated is largely unknown as the options considered have no statutory weight. Future retail development on this site would significantly undermine the ACS and the retail floorspace forecasted by 2036. The ACS predicts a 2036 timeframe to achieve 17,000m2 - 20,000m2 of retail floorspace. The Forrestfield District Centre already contains 12,956m2. This means that only 7,000m2 of retail floorspace would need to be provided in the next 13 years across 100,000m2 of land area which is zoned District Centre. This retail cap is already considered to be restricted given the extent of the District Centre zone. Adding a further 18,000m2 of land area is a significant concern given the floorspace caps outlined within the ACS. Creating more land area supply with the same retail forecasted floorspace cap, is not appropriate	

	particularly when the rezoning of this site to District Centre was not foreshadowed within the ACS. This is a primary reason as to why the strategic planning framework needs to be progressed prior to the scheme amendment, to re-assess the floorspace caps for the District Centre and ensure an appropriate allocation of floorspace to coordinate future development and maintain the 'core' of the Forrestfield District Centre. For the reasons given above and based on the information available at the time of preparing this submission, we strongly object to SA 109 seeking to rezone the subject site to District Centre. PLANNING FRAMEWORK ACTIVITY CENTRE STRATEGY The City of Kalamunda's Activity Centre Strategy (ACS) was adopted in 2021. The ACS role is to provide direction and guidance on the future development of activity centres within the City of Kalamunda. ACS outlined as of 2016 the Forrestfield District Centre contained 12,956m2 of retail floorspace. The ACS predicts the retail floorspace to grow to 17,000m2 - 20,000m2 by 2036. It is noted the ACS does not contemplate the expansion of the District Centre zone further, rather, only considers a gradual growth in floorspace as the population expands within the catchment. There is no discussion within the ACS that the District Centre needs to expand in land area in order to accommodate this floorspace. It is considered that this floorspace could easily be accommodated within the land area which is already zoned District Centre particularly given the landholdings which are largely undeveloped and underutilised in their current format. Further contributing land area which is zoned District Centre and providing additional supply is detrimental to the core of the Forrestfield District Centre particularly given the	

	lack of planning control or strategic planning framework to coordinate development across the Precinct. It is clearly noted within 1.6. (b) of the ACS that a Precinct Structure Plan should be prepared for the Precinct. It is incongruent with the principles of orderly and proper planning to be considering a rezoning to expand the District Centre of this scale without a Precinct Structure Plan being progressed. It is highly inappropriate for the City to proceed to initiate a scheme amendment of this size, particularly when the scheme amendment contains no floorspace controls and more importantly a strategic planning framework which holistically considers the additional floorspace and multitude of redevelopment options. The Precinct Structure Plan should have been prepared and substantially progressed at the very least prior to progressing with the rezoning of the subject site. It is therefore considered that the rezoning of the subject site to District Centre is inconsistent with the ACS. As the primary framework for guiding the growth and redevelopment of commercial centres within the City, it is a significant concern that SA109 does not align with this framework prepared by the City in 2021. For the reasons below, we strongly object to SA 109. 1 . The ACS does not contemplate the expansion of the District Centre zoning to the subject site. 2. The proposed scheme amendment is incongruent with orderly and proper planning as further expanding the District Centre zoning without a Precinct Structure Plan has the potential to undermine the hierarchy and disruption of activity, land use and floorspace across the District Centre. FORRESTFIELD DISTRICT CENTRE STRUCTURE PLAN 2012 The City adopted a Structure Plan in 2012 for the Forrestfield District Centre. The Structure Plan is very minimal in terms of prescribing development controls to coordinate an outcome across the Forrestfield District Centre. Whilst the subject site is located (according to the 2012 Structure Plan) within the District Centre, the Structure Plan makes no reference to the subject site	

	being zoned to District Centre. Specifically, the Structure Plan states the subject site as an 'Opportunity Site' which may be developed for residential, commercial or mixed uses. This provides no specific guidance on future zoning as this could cover a diversity of land uses which could be provided under the current zoning. The Structure Plan specifically states the following regarding the subject site: *Finalise comprehensive site planning for the redevelopment of Lot 106, making provision for the new medium-density housing development, additional commercial development, improvements to the Community Centre building and surrounds, inclusion of the proposed new library building, and possible inclusion of a Shire "shop front" office.* It is understood that to date no comprehensive site planning has been undertaken that would guide future redevelopment of the site. More broadly, the Structure Plan provides very limited coordination across the Precinct. As per the ACS, prior to any further expansion or consideration of a greater District Centre zoning this layer of detailed planning is required to be undertaken. The District Centre zone is already extremely vast with much of the land directly east of the subject site also being zoned District Centre. Further expanding the District Centre zone to some 1OO,OOOm2 of land area without any current site specific planning/modelling being undertaken is not considered orderly and proper planning with the primary concern that each of these respective sites could develop to a level of commercial intensity that would detrimentally impact the core of the activity centre. In addition, without this coordination the District Centre could become fragmented with limited control on the type of land use and extent of floorspace each respective landholding within the District Centre could develop to. To demonstrate the scale of the existing vs the proposed District Centre the following imagery is provided.	

	Current  Proposed 	

	Prior to considering any further expansion of the District Centre a detailed planning framework needs to be progressed over the landholdings to prescribe appropriate planning controls for the Precinct and coordinate development. Moreover, by overlooking the preparation of a Precinct Structure Plan for the entire District Centre, the City has prevented any opportunity for positive, meaningful engagement with key community stakeholders (Le., neighbouring business owners, retailers, shoppers and residents) which would have otherwise helped to inform a holistic urban design outcome and land use mix for Hawaiian's Forrestfield. This lack of planning rigor is a significant concern to the Hawaiian's Forrestfield as the 'core' of the Forrestfield District Centre. There is a multitude of redevelopment options for the subject site which could occur following the rezoning of the subject site that have the potential to undermine the existing Centre. For the reasons listed above, we strongly object to the proposed SA 109. STATE PLANNING POLICY 4.2 - ACTIVITY CENTRES (DRAFT) The Draft SPP 4.2 is understood to be imminent and will subsequently replace the current SPP 4.2. Given the document has been advertised, it is considered a seriously entertained planning framework and shall be given due regard. The City's report outlined that the proposal doesn't meet the threshold of a major development. However, this is assuming that Option A proceeds. From a statutory standpoint, there is no commitment or binding provision that would tie the City or other party from developing to the indicative floorspace outlined in Option A. Given the available land area, and the fact that the entire site is proposed to be rezoned to District Centre, the City must consider the development potential which is being granted to the subject site. Currently, it is a significant concern for the landowners of Forrestfield District Centre, that the City is seeking to rezone the entire land parcel to District Centre based on a notational floorspace presumption that is not binding in any way.	

	As outlined, once the site is zoned 'District Centre' the subject site has the same development potential as any of the adjacent sites within the Forrestfield District Centre. This is without any guiding structure plan and no shop/retail floorspace controls within the scheme to allocate floorspace to respective sites within the District Centre. This is highly problematic given the available land area, and the potential to disrupt the hierarchy of the activity centre with the core of District Centre being Lot 109 and Lot 102. Whilst the City's preferred option doesn't meet the major development threshold, there is no guarantee given as part of SA 109 that this option will proceed as proposed. As the site can accommodate a 'major development', it needs to be assessed as one, as per the requirements of the Draft SPP 4.2. *CONCLUSION* We do not consider that SA 109 should have been initiated by Council. There are significant concerns of how SA 109 has been progressed particularly given the lack of planning control around the end development outcome and lack of engagement with the landowners of the Hawaiian's Forrestfield. On behalf of the landowners, we strongly object to SA 109 and request the City to recommend that SA 109 is not supported. Our primary reasons for objection to SA 109 are outlined below: 1. There is no certainty that Option A will proceed. That is, the size of the land parcel (Le., 18,000m2) could be developed to a scale which far exceeds the scale of development envisaged under the concept plan. 2. The City's ACS and Structure Plan identify the need to undertake detailed site planning and precinct structure planning, neither of which have occurred. 3. The proposed expansion of the District Centre zone (i.e., 18,000m2gross floor area) significantly exceeds the floorspace increase envisaged by the City's ACS, which predicts 17,000m2 - 20,000m2 (total net floorspace area) by 2036.	

	4. The Impact Test only contemplates one distinct development possibility (i.e., Option A). As there is no certainty that Option A will proceed, the Impact Test does not fully contemplate the effects the proposed rezoning may have on the activity centre hierarchy. Further detailed assessment is necessary to consider the full and complete implications of the proposal. 5. There is a significant concern this rezoning proposal will detrimentally impact the Core of the Forrestfield District Centre being Hawaiian's Forrestfield. Hyde Park Management has made significant investment into Hawaiian's Forrestfield and future investment is at risk if this proposal proceeds. In addition, impacts to the existing businesses in Hawaiians Forrestfield could also be significant with the potential to impact investment decisions, employment opportunities and overall reducing the quality of the Centre moving forward. Given the reasons above, SA 109 should not proceed until the Precinct Structure Plan proceeds with detailed modelling and controls prepared to guide development across the District Centre. In addition, the City needs to consult with the existing landowners within the District Centre, in particular the owner and operator of the core of the Forrestfield District Centre. Should Council decide to proceed with SA 109, as a minimum, Council should impose floorspace restrictions over the subject site given the scheme amendment is predicated on Option A proceeding.	
5.	The subject site for the proposed amendment falls within the student enrolment local intake area of Woodlupine Primary School and is in close proximity to Forrestfield Primary School. The Department has no objections to the proposed Amendment as it will likely have minimal impact on the nearby public schools in terms of amenity and student accommodation capacity.	Noted
6.	The DoH has no objection to the above scheme amendment and provides the following comment:	Noted

	1. Water Supply and Wastewater Disposal Resulting developments from these scheme amendments are required to connect to scheme water and reticulated sewerage and be in accordance with the Government Sewerage Policy 2019. 2. Increased Density - Public Health Impacts Where residential development is considered, the City of Kalamunda should also use this opportunity to minimise potential negative public health and amenity impacts of the increased density development such as noise, odour, light and other lifestyle activities. Such issues are most effectively addressed at this stage. 3. Food Act Requirements Where applicable, all food related areas to comply with the provisions of the Food Act 2008 and related code, regulations and guidelines. Details available for download from: https://ww2.health.wa.gov.au/Articles/S T/Starting-a-food-business-in-WA 5. Health (Miscellaneous Provisions) Act Requirements All public access areas (halls, meeting rooms, etc.) are to comply with the provisions of the Health (Miscellaneous Provisions) Act 1911, related regulations and guidelines and in particular Part VI - Public Buildings.	Note the DOH have confirmed the misnumbering is a typing error.
7.	I refer to your email dated 1 November 2022 regarding the submission of a Bushfire Management Plan (BMP) (Version A), prepared by Bushfire West and dated May 2022, for the above proposal. The BMP is accompanied by a Council Report from the decision maker dated 26 July 2022. This advice relates only to State Planning Policy 3. 7 Planning in Bushfire Prone Areas (SPP 3.7) and the Guidelines for Planning in Bushfire Prone Areas (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with all other relevant planning policies and building regulations where necessary. This advice does not exempt the applicant/proponent from obtaining necessary approvals that may apply to the proposal including planning, building, health or any other approvals required by a relevant authority under other written laws.	Note and modifications are recommended to address the deficiency. The modification would be considered minor and further advertising would not be required in line with Planning & Development (Local Planning Schemes) Regulations 2015 Regulation 51 (1) (b)

General Comments

High level consideration of bushfire risk is one of the most effective means of preventing inappropriate development in bushfire prone areas. A BHL assessment provides a 'broad brush' means of determining the potential intensity of a bushfire for an area. It is a pre-development tool used to inform decision making at subsequent planning stages (structure planning, subdivision and development).

DFES urges the City to ensure that further consideration is given to the bushfire protection at subsequent planning stages to reduce the vulnerability of dwellings and residents from the impact of a bushfire, and to ensure continued compliance with SPP 3.7 and the Guidelines. In particular ensuring that appropriate setbacks are provided from unmanaged vegetation.
The following assessment is intended to guide subsequent planning stages.
Assessment

1. Policy Measure 6.3 a) (ii) Preparation of a BAL Contour Map

Issue	Assessment	Action
Vegetation Classification	Evidence to support the exclusion of Public Open Space (POS), road reserve and other areas as managed to low threat in accordance with AS3959 is required. Specifically: • pos - Plot 4 and 5. The POS includes grassed areas, however it is uncertain if this area is managed to the requirements of exclusion 2.2.3.2 (f) (noting that grassland should not exceed a height of 100mm). It is unclear	Clarification required. The decision maker to be satisfied with the vegetation exclusions and vegetation management proposed.

	how this area is to be managed to low threat in perpetuity. • Plots 7 and 11. Images provided do not support the classification of 'managed to low threat' or non-vegetated. Evidence has not been provided to validate management of the road reserve by the responsible authority, or the area of the private lot by the land-owner. Areas to the east of Photo I D 11 c are vegetated however photo evidence has not been provided to justify the exclusion of these sections as 'non-vegetated'. Alternatively, the vegetation should be classified as per AS3959, or the resultant BAL ratings may be inaccurate.	

2. Policy Measure 6.3 c) Compliance with the Bushfire Protection Criteria

Element	Assessment	Action
Location	A 1.1 - not demonstrated The BAL ratings cannot be validated, as the vegetation classification inputs require clarification as per the above table.	Modification required. Resolve issues in the table above to ensure compliance to Element 1.

Recommendation - not supported modifications required.

	DFES has assessed the BMP and identified critical issues that need to be addressed prior to providing support for the proposal (refer to the tables above). At the scheme amendment stage, consideration should be given to the intensification of land use and how this relates to identified bushfire hazards at this location. DFES acknowledges comments made in the Scheme Amendment Report and BMP, confirming that an APZ/setbacks will be required to ensure that adequate separation is provided between vegetation hazards and future developments.	
8.	The Water Corporation has no objections or concerns with the proposed rezoning. The preparation of a local structure plan or concept plan for the site will provide further opportunities to assess the water and wastewater servicing needs for the development site.	Noted