



City of Kalamunda – Submission – City of Gosnells Proposed Operations Centre and Public Open Space, Kelvin Road, Orange Grove

The City of Kalamunda (the City) thanks the City of Gosnells (CoG) for the opportunity to comment on the CoG proposed Operations Centre and Public Open Space (POS) at Kelvin Road, Orange Grove.

Summary

Operation Centres are typically located within industrial areas and are typically considered an industrial type use. Due to this classification, it is considered that the proposal is, generally, inconsistent with planning of the broader area and is not supported. It is noted that Light Industry zones, at a local planning scheme level, may be considered under an Urban Zone in the Metropolitan Region Scheme (MRS). An example of this situation in the City is the Forrestfield / High Wycombe Industrial Area. Notwithstanding this, regard needs to be given to the existing and proposed surrounding uses and the strategic intent of the surrounding area. In this context, significant community engagement and preliminary concept planning has informed the future planning for the surrounding area (Wattle Grove South).

It is recommended that an alternative site is considered for the Operations Centre, preferably within an industrial area. Should the proposed Operations Centre proceed, it is requested that the CoG provide appropriate interface buffers and demonstrate that the management mechanisms for potential adverse impacts to the surrounding area are put in place. The proposal for vegetated buffers and POS are, in-principle, supported.

It is requested that CoG, should the proposal proceed, liaise with the City to ensure these measures are appropriately implemented.

Regional Planning Context

The site is zoned Rural under the MRS. The Western Australian Planning Commission (WAPC) endorsed the South Metropolitan Peel Sub-regional Planning Framework (the Framework) in March 2018 and identifies the locality surrounding the proposal as an Urban Expansion area. Key considerations identified by the Framework for the area include:

1. Geotechnical analysis/land suitability to provide connections to reticulated waste water services.
2. Bushfire risk.
3. Protection of significant environmental attributes.

The industrial nature of the Operations Centre is considered to be inconsistent with the Urban Expansion identification under the Framework and the existing Rural zoning. It is noted that Light Industry zones, at a local planning scheme level, may be considered under an Urban Zone in the MRS. Notwithstanding this, regard needs to be given to the existing and proposed surrounding uses and the strategic intent of the surrounding area.

City of Gosnells Local Planning Context

The CoG Draft Local Planning Strategy 2019 identifies Orange Grove as a 'Potential Urban Expansion Area' and has been identified as a long term growth area. Orange Grove is identified as Rural Planning Precinct No. 4 - Kelvin Road Precinct (RPP 4) and Rural Precinct 3 (RPP 3) by the CoG Foothills Rural Strategy. RPP 4 contains a variety of lot sizes, which are generally between one to four hectares. The Precinct is relatively well serviced with scheme water, electricity and telecommunications. It is however, not serviced by reticulated gas or sewer.

The precinct comprises 36 individual properties that collectively cover approximately 90 hectares. 16 of the properties are owned by the CoG which combined, once occupied the Kelvin Road Waste Disposal site. The remaining 20 properties are held in private ownership. These sites are generally commercial or rural in nature. RPP 3 is the eastern end of Kelvin Road and includes Valcan Road. This precinct is rural residential in nature. The Foothills Rural Strategy recommends a minimum of one hectare properties for the area. The CoG Local Planning Scheme No. 24 is being preparing in conjunction with the Local Planning Strategy and it is envisaged the area will be rezoned to Rural Residential. The area is currently zoned General Rural.

The industrial nature of the Operations Centre is considered to be inconsistent with the urban investigation and rural residential identification under the draft Local Planning Strategy 2019 and the Foothills Rural Strategy.

City of Gosnells Submission on the City of Kalamunda's Draft Industrial Development Strategy

On 1 October 2018, the CoG provided a submission on the City's draft Industrial Development Strategy (IDS). The draft IDS identified a portion of 'Wattle Grove South' as industrial investigation. The CoG provided a submission and objected to this identification due to potential adverse impacts on adjacent Orange Grove rural residential properties and the fact that the North East Sub-regional Planning Framework identifies the area as Urban Expansion, making the proposal inconsistent with this identification.

The City subsequently removed the industrial investigation identification from this area in the final version of the IDS. Operations centres are generally associated with industrial areas and industrial type operations. The proposed Operations Centre may have potential impacts on both Wattle Grove South and Orange Grove residents and could be considered as inconsistent with the South Metropolitan and North East Sub-regional Planning Frameworks. It is noted that Light Industry zones, at a local planning scheme level, may be considered under an Urban Zone in the MRS. Notwithstanding this, regard needs to be given to the existing and proposed surrounding uses and the strategic intent of the surrounding area. In this context, significant community engagement and preliminary concept planning has informed the future planning for the surrounding area (Wattle Grove South).

City of Kalamunda Local Planning Context - Crystal Brook (Wattle Grove South)

The area recently named, at a project level, Crystal Brook through community engagement and often referred to as Wattle Grove South borders Orange Grove and is identified as Urban Expansion / Urban Investigation by the North East Sub-regional Planning Framework. The area is identified by the City's Local Planning Strategy 2010 as an urban investigation area. The City's draft Local Housing Strategy 2020 (LHS), which was adopted for the purpose of public advertising in March 2020 identifies the area as an Investigation Area. The LHS has been issued to the CoG for comment.

A portion of the area was identified by a Feasibility Study prepared in 2018 and the City's draft Industrial Development Strategy 2018 as an industrial investigation. This identification was removed from the final Industrial Development Strategy adopted by Council in December 2018 due to community feedback. During community engagement, the community voiced a strong appreciation and desire for the protection of the environmental and rural values of the broader area.

Following engagement with the community, Council resolved in February 2019 to engage a consultant to undertake community engagement and prepare concept plans on potential land use and development outcomes for the area focussing on the protection of environmental values, sustainability outcomes and maintaining the character and amenity of the area. In August 2019, the Council resolved to engage

Roberts Day to undertake this process. Community engagement commenced in December 2019 and the community has reiterated the desire for environmental protection, maintaining the rural character and amenity of the area and investigating potential sustainability initiatives that can be incorporated into future developments through the planning process.

Draft concept plans are currently being prepared and are anticipated to be released to the community for comment in early May 2020. The CoG will be referred to during the advertising process of these concepts for comment. The proposal for an operations centre adjacent to this area would be inconsistent with the current planning for the area and may have the potential to cause adverse impacts. Residents within this area often complain about trucks utilising Crystal Brook to 'rat run' to Welshpool Road East and access Tonkin Highway. This may cause further issues on this lower order road.

The proposal for an enhanced public open space / recreational facility is, in principle, supported and may provide an appropriate outcome depending what is envisaged, providing recreational and amenity benefits for both Orange Grove and Wattle Grove. This support is provided for the public open space / recreational facility in isolation and not in conjunction with the proposed operations centres. The public open space / recreational facility component is considered consistent with the planning for the area. The proposed vegetated buffer may also assist with providing an appropriate interface with Crystal Brook. It is requested that the CoG liaise with the City when planning and implementing the vegetated buffer to ensure the buffer minimises potential adverse impacts and provides desirable amenity for Crystal Brook residents.

Please contact the City's Strategic Planning team for further information on the Crystal Brook project.

<https://engage.kalamunda.wa.gov.au/reset-wattle-grove-south>

Public Open Space

The City has an overall shortfall of public open space and sports space as identified in the City's Public Open Space Strategy 2018 and is continuing to review and plan its passive and active open space provision. This proposal may assist with alleviating such pressures given its location on the border of the City.

It is noted that given the history of the site as a previous landfill site and the significant remediation that may be required, the site may be limited to passive open space or non-traditional sports.

The City wishes to continue to liaise with the CoG and requests to be invited to further understand and discuss the various development opportunities for the proposed POS site. Please contact the City's Community Development team to discuss these opportunities.

Traffic

It is noted that as part of the proposal no traffic information has been provided to understand how both the operation centre and public open space will impact on the traffic and road network of the broader area, particular truck traffic within Crystal Brook.

It is requested that a Transport Impact Assessment (TIA) be provided for review and comment, to specifically identify the extent of impacts to Kelvin Road and Crystal Brook Road arising from the proposed Operations Centre and POS. Please contact the City's Asset Planning team to discuss the information required.

Water

It is noted as part of the proposal that no water management information has been provided to better understand how water will be managed on site and off site.

It is requested that an Urban Water Management Plan (UMP) or Stormwater Management Plan is provided to the City for review and comment. Please contact the City's Asset Planning team to discuss the information required.

Parks and Environment

It is noted that as part of the proposal no environmental survey, study or similar has been provided to demonstrate how environmental values will be managed and protected in roadsides, the future POS and within the development itself. It is requested that a flora survey and an environmental management plan is provided to the City for review and comment. Please contact the City's Parks and Environment team to discuss the information required.

Environmental Health

It is noted that a number of amenity impacts have not been addressed in the proposal. Operations Centres can be associated with excessive dust, noise and general visual amenity impacts to the surrounding area. The proposed waste management component has the potential to cause noise, dust, odour and general visual amenity impacts. It is requested that an Amenity Management Plan is provided to the City for review and comment. The Amenity Management Plan is to address amenity impacts including, but limited to noise, odour, dust and visual impacts. Please contact the City's Environmental Health team to discuss the information required.

The City notes that the CoG have stated in their frequently asked questions that 'the design and location has been specifically selected to minimise the impact on the community. The new Operations Centre is proposed to be constructed on the previous landfill site. It is a complementary land use for the tip site and its environs.'

In regard to the remediated landfill site proposed for public open space, the City has experiences with a number of old landfill sites and attempting to remediate and or manage them for public open space purposes, including for playing fields. These experiences have netted negative and positive results and significant learnings. It is recommended that the CoG contact the City's Environmental Health team to discuss these prior experiences and learnings.

Conclusion

1. The proposed Operations Centre is inconsistent with the planning of the broader area as identified in the Frameworks, Local Planning Strategy, Foothills Rural Strategy and Crystal Brook (Wattle Grove South) Concept Planning. It is noted that Light Industry zones, at a local planning scheme level, may be considered under an Urban Zone in the MRS. An example of this situation in the City is the Forrestfield / High Wycombe Industrial Area. Notwithstanding this, regard needs to be given to the existing and proposed surrounding uses and the strategic intent of the surrounding area. In this context, significant community engagement and preliminary concept planning has informed the future planning for the surrounding area (Wattle Grove South).
2. It is recommended that an alternative site is considered for the Operations Centre, preferably within an industrial area.
3. Should the proposed Operations Centre proceed it is requested that the CoG provide appropriate interface buffers and demonstrate that management measures for the potential adverse impacts to the surrounding area are put in place.
4. The vegetated buffer and proposed POS are, in-principle, generally supported.
5. The City wishes to continue to liaise with the CoG and requests to be invited to further understand and discuss the various development opportunities for the proposed POS site.
6. The following additional information is requested to be provided to the City for review and comment:
 - a) Traffic Impact Assessment.
 - b) Either a UWMP or Stormwater Water Management Plan.
 - c) Flora Survey and Environmental Management Plan.
 - d) Amenity Management Plan