

Response to Submissions Received

Structure Plan Modification - Lots 192, 193 and 194 Hale Road, Wattle Grove

Submitter No.	Nature of Submission	City of Kalamunda Response
Submitter 1	No Objection – no further comment	The City acknowledges the submission.
Submitter 2	Object – no further comment	The City acknowledges the submission.
Submitter 3	<p>Good afternoon</p> <p>Just in regards to the modification of the structure plan for the above lots from mixed use to commercial.</p> <p>I have no issues in regards to this. I live on XX Wimbridge Rd Wattle Grove(directly opposite) and the current Trees A Green old site is an eyesore for the area. Some nice retail or any new development would be a welcome change. I would not endorse a 24 hour shop / tavern or late night opening hours and having people hanging around the neighborhood, as this may bring unwelcomed visitors and riff raff to the area.</p> <p>However my only request or concern is that entry to these business or car access be via Hale Rd . Currently Wimbridge Rd is getting busier and busier. Morning school time and afternoon pick ups make the road a carpark and it can be very hard try and get out of your driveway at times. Alot of school kids also walk this street so safety has to be a priority.</p> <p>Therefore I request the only access to these businesses (and the carpark) be from Hale Rd only.</p> <p>Many thanks</p> <p>XXXX (Wattle Grove resident)</p>	<p>The City acknowledges the submission.</p> <p>The potential future development is not currently being considered in terms of a 24 hour shop or tavern, but it is acknowledged that the two land uses listed are not currently permissible.</p> <p>When the City considers a Development Application on the site in the future, traffic impacts, including the location of vehicle access will be assessed to ensure vehicles will be able to enter and exit the site safely.</p> <p>The City is not proposing to restrict access from Wimbridge Road, however the appropriateness of all proposed access will be assessed to ensure it is safe.</p>
Submitter 4	Object – no further comment	The City acknowledges the submission.

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Submitter 5	We built our family home in 2018 knowing this land was planned to be residential. Hale Roads traffic is hectic enough already without adding anymore commercial space.	The City acknowledges the submission. The current structure plan designates the subject sites for 'Mixed Use' development, it has not been planned for residential development. Residential uses are possible under the current land use designation, but other commercial uses are also possible.
Submitter 6	No objection to proposal regarding Proposed Structure Plan Modification.	The City acknowledges the submission.
Submitter 7	I object to this on the grounds we brought our property knowing that the adjacent land was not commercial and was told that this would eventually become residential housing. Totally against this becoming commercial.	The City acknowledges the submission. The current structure plan designates the subject sites for 'Mixed Use' development, it has not been planned for residential development. Residential uses are possible under the current land use designation, but other commercial uses are also possible.
Submitter 8	XXXX have prepared this submission in objection to proposed Outlined Development Plan (ODP) amendments being sought to the Wattle Grove Urban Cell U9 ODP. The amendments propose to modify the designated zoning of Lots 192, 193 and 194 (No. 310, 318 and 326) Hale Road, Wattle Grove (the subject site) from 'Mixed Use' to 'Commercial' to facilitate a significant increase in shop/retail floorspace.	The City acknowledges the submission.

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	<p>This submission has been prepared on behalf of Hyde Park Management Ltd, being the landowner Hawaiian’s Forrestfield located at Lot 102 (No. 20) Strelitzia Avenue, Forrestfield and Lot 109 (No. 80) Hale Road, Forrestfield approximately 2.2km north east of the subject site.</p> <p>We have reviewed the proposed amendment and accompanying supporting reports prepared by Dynamic Planning and Pracsys. Whilst the increase in retail floorspace at the existing neighbourhood centre is able to be contemplated, we are concerned that the proposed amendment is not consistent with pivotal aspects of the City of Kalamunda (the City) local planning framework and the State’s planning framework.</p> <p>The additional shop/retail floorspace being sought in this location has not been appropriately justified and lacks supporting information required by State Planning Policy to facilitate such a request. On this basis, we respectfully request that the proposed amendment not be adopted by Council in its current form for the reasons identified below.</p> <p>Proposed Amendment – Our Review</p> <p>We understand the proposed amendment seeks to rezone a portion of the subject site from ‘Mixed Use’ to ‘Commercial’, with the ‘Commercial’ zoned portion of the subject site being located to front Hale Road. The remaining portion of the site will remain ‘Mixed Use’.</p> <p>The Applicant advises that the amendment should be considered a ‘minor amendment’ in accordance with the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i>. The proposal should not be considered as minor given the proposed doubling of shop-retail net lettable area (NLA).</p>	<p>The City is satisfied with the information that has been submitted in support of the proposal.</p> <p>The City is satisfied that the proposed amendment is consistent with relevant planning frameworks.</p>
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	<p>A development concept plan has been prepared to support the proposed amendments and whilst the City did not advertise this information, we understand that the 'Commercial' zoning sought will allow for the development of a supermarket, medical centre, community hub and a tavern. The proposed amendment will allow for the development of an additional 3,270m² of shop-retail NLA adjoining the existing Wattle Grove Village Centre, which currently provides 3,712m² NLA. The proposed amendment will result in a significant increase to the existing shop-retail floorspace immediately adjoining the existing Wattle Grove Village Centre. Despite this, the proposed amendment is not supported by a Retail Sustainability Assessment (RSA) as required by the Western Australian Planning Commission (WAPC) <i>State Planning Policy 4.2 – Activity Centres for Perth and Peel</i> (SPP4.2) or any supporting traffic assessment.</p> <p>Matters for Consideration</p> <p>As currently proposed, the amendment is not consistent with the City's strategic planning framework and an assessment of the potential economic and related effects of a significant retail expansion on the network of activity centres in the locality has not been undertaken. The following matters provide further discussion around our particular concerns.</p> <p>1. Retail Sustainability Assessment</p> <p>Clause 6.5 of the WAPC's SPP4.2 defines and explains the role of an RSA as follows: <i>A Retail Sustainability Assessment (RSA) assesses the potential economic and related effects</i></p>	<p>The original information submitted to the City did include a concept plan of a possible development outcome for the site.</p> <p>Given the City is not currently considering a Development Application, the concept plan was considered to include a high level of detail which is not appropriate for consideration of a structure plan.</p> <p>The proposal was supported by a Retail Needs Assessment. The City is satisfied that the develop of information provided reflects the scale of impact of the proposed amendment.</p> <p>While the proposal was not supported with traffic information, the traffic implications of the proposed amendment do not warrant detailed technical information. The City considers that given the movement network surrounding the site has already been set, impacts of development of the subject site are appropriately considered at the development application stage when the design of development, specific land uses and related impacts are known.</p> <p>While the applicant provided a concept plan for information purposes, that plan is not</p>
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	<p><i>of a significant retail expansion on the network of activity centres in a locality. It addresses such effects from a local community access or benefit perspective, and is limited to considering potential loss of services, and any associated detriment caused by a proposed development. Competition between businesses of itself is not considered a relevant planning consideration.</i></p> <p>Clause 6.5.2 of SPP4.2 requires the preparation of an RSA as follows: <i>(1) Major developments and scheme amendments or structure plans that provide for major development are to include a RSA. Furthermore, any proposal that would result in the total shop retail floorspace of a neighbourhood centre exceeding 6000m² nla, or expanding by more than 3000m² shop-retail nla also requires a RSA.</i></p> <p>Clause 6.5.2 of SPP4.2 allows for a responsible authority to waive a requirement for a RSA where the proposed shop-retail floorspace is substantially within the walkable catchment of a passenger rail station, in view of the scale and likely impact of the proposal. As the proposal is not within the walkable catchment of a passenger railway station Clause 6.5.2 of SPP4.2 does not apply to the subject site.</p> <p>Although there are applicable exemptions that would not require an RSA to be provided, these do not apply in this instance.</p> <p>A Retail Needs Assessment (RNA) has been prepared by Pracsys to support the proposed amendment, however, this is not considered to be appropriate and provides an insufficient amount of relevant detail for the City's consideration.</p> <p>Based on the requirements of SPP4.2, an RSA is required to support the proposed amendment.</p>	<p>binding in any way, and could potentially be misleading.</p>
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	<p>2. Supporting Traffic Information The proposed amendment is not supported by any traffic analysis. The WAPC's Transport Assessment Guidelines indicate that at least a Traffic Impact Statement, or more likely a Transport Impact Assessment is required as a result of a proposed amendment seeking to facilitate a future development with an additional shop/retail floorspace of 3,270m2 NLA. The proposed amendment will allow for a number of additional land uses to be considered at the subject site in the future, which are land uses that can generate a much larger volume of traffic. This is detailed within table 1 of the WAPC's Transport Assessment Guidelines below and indicates that the proposal will have a moderate – high impact based on the additional shop/retail floorspace achievable.</p> <p>3. Integrating Development</p> <p>We note that a future development proposal at the subject site will be unlikely to integrate with the existing Wattle Grove Village Centre to the immediate south of the subject site. Existing development at Lot 191 (No. 332) Hale Road has only recently been completed and does not allow for any vehicle or pedestrian connections between the existing and future shop/retail floorspace proposed. In the event that additional shop/retail floorspace at the subject site is enabled through the proposed amendment, the City needs to be aware of the potential integration issues that will occur as part of the development application process. In reality, the Wattle Grove Village Centre will be made up of</p>	<p>The City agrees that due to the event of two lots being developed in advance of the adjoining three lots.</p> <p>However the subject sites are already designated for "Mixed Use" development, which would have benefited from greater integration and allowance for reciprocal access and parking between the sites.</p> <p>But this is not a distinguishing element of the proposed amendment, as the opportunity for integration between the existing 'Commercial'</p>
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	<p>two distinctly separate centres, with inadequate vehicle and pedestrian connections being able to be provided between two areas where products and services are provided to the community.</p> <p>The appropriate integration of shop/retail floorspace is a key requirement and cannot be overlooked as it would be contrary to the WAPC's SPP4.2 which states that, <i>'Neighbourhood and local centres play an important role in providing walkable access to services and facilities for communities'</i>.</p> <p>4. Planning for Aged Persons The City's Local Planning Strategy and Age Friendly Strategy and Action Plan specifically identifies the need to plan for the City's existing and future aged population within the local government area.</p> <p>The City's Local Planning Strategy recognises the need to plan for aged persons and the Applicant's submission responds to this by including various extracts from the Local Planning Strategy in this regard.</p> <p>The proposed amendment seeks to change the designated land use at the subject site to allow for a potential development of a supermarket, medical centre, community hub and a tavern. This will result in a reduced area of 'Mixed Use' zoned land and therefore reduce the ability to provide aged/dependant dwellings or aged residential care land uses at the subject site in accordance with the City's overarching development aspirations set out in its Local Planning Strategy.</p> <p>Summary The proposed amendment will substantially increase the existing shop/retail floorspace at the subject</p>	<p>designated sites and the adjoining 'Mixed Use' sites is already not available.</p> <p>The City considers that the three sites subject to the proposed amendment will be able to achieve a desirable level of integration.</p> <p>Aged Residential Care is a land use which is capable of approval in both the 'Mixed Use' and 'Commercial' designations. Should the landowners wish to develop all three sites for aged persons, they will be able to under the proposed amendment.</p>
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	<p>site, delaying any future development opportunities at Hawaiian’s Forrestfield from occurring in the short to medium term.</p> <p>Following our review, we are of the opinion that the proposed amendment should not be adopted by Council in its current form for the reasons identified below:</p> <ul style="list-style-type: none"> • The proposed shop/retail floorspace expansion represents a substantial increase and is not appropriately justified as a RSA has not been prepared in accordance with the WAPC’s SPP4.2 requiring this. • The proposed amendment, floorspace expansion and potential land uses that may locate at the subject site as a result of the proposed amendment will likely have a moderate to high impact on the surrounding road network. As such, at least a Traffic Impact Statement but more likely a Traffic Impact Assessment would be required in accordance with the WAPC’s Transport Assessment Guidelines to support the proposal. • The subject site immediately adjoins the existing Wattle Grove Village Centre to the south. There are limited opportunities for the existing centre and a proposed future development to appropriately integrate with one another. The lack of integration will result in a poor planning outcome and potentially increased localised vehicular movements between the subject site and Wattle Grove Village Centre should the amendment be approved. • The proposed amendment will facilitate a potential future supermarket development and tavern at the subject site. This will reduce the existing area available at the subject site to 	
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	<p>facilitate housing opportunities for a growing aged population in the City and this is contrary to the City's Local Planning Strategy in this respect. It is respectfully requested that the Council do not proceed to adopt the proposed amendment in its current form and request the applicant provide a RSA to support the floorspace expansion along with an appropriate traffic analysis to support the increased activity and vehicle trips generated.</p>	
Submitter 9	<p>XXXX have prepared this submission in objection to proposed Outlined Development Plan (ODP) amendments being sought to the Wattle Grove Urban Cell U9 ODP. The amendments propose to modify the designated zoning of Lots 192, 193 and 194 (No. 310, 318 and 326) Hale Road, Wattle Grove (the subject site) from 'Mixed Use' to 'Commercial' to facilitate a significant increase in shop/retail floorspace.</p> <p>This submission has been prepared on behalf of Hyde Park Management Ltd, being the landowner Hawaiian's Forrestfield located at Lot 102 (No. 20) Strelitzia Avenue, Forrestfield and Lot 109 (No. 80) Hale Road, Forrestfield approximately 2.2km north east of the subject site.</p> <p>We have reviewed the proposed amendment and accompanying supporting reports prepared by Dynamic Planning and Pracsys. Whilst the increase in retail floorspace at the existing neighbourhood centre is able to be contemplated, we are concerned that the proposed amendment is not consistent with pivotal aspects of the City of Kalamunda (the City) local planning framework and the State's planning framework.</p> <p>The additional shop/retail floorspace being sought in this location has not been appropriately justified</p>	<p>This submission is substantially similar to submission 8. Please refer to the responses in submission 8.</p>

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	<p>and lacks supporting information required by State Planning Policy to facilitate such a request. On this basis, we respectfully request that the proposed amendment not be adopted by Council in its current form for the reasons identified below.</p> <p>Proposed Amendment – Our Review We understand the proposed amendment seeks to rezone a portion of the subject site from 'Mixed Use' to 'Commercial', with the 'Commercial' zoned portion of the subject site being located to front Hale Road. The remaining portion of the site will remain 'Mixed Use'. The Applicant advises that the amendment should be considered a 'minor amendment' in accordance with the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i>. The proposal should not be considered as minor given the proposed doubling of shop-retail net lettable area (NLA). A development concept plan has been prepared to support the proposed amendments and whilst the City did not advertise this information, we understand that the 'Commercial' zoning sought will allow for the development of a supermarket, medical centre, community hub and a tavern. The proposed amendment will allow for the development of an additional 3,270m² of shop-retail NLA adjoining the existing Wattle Grove Village Centre, which currently provides 3,712m² NLA. The proposed amendment will result in a significant increase to the existing shop-retail floorspace immediately adjoining the existing Wattle Grove Village Centre. Despite this, the proposed amendment is not supported by a Retail Sustainability Assessment (RSA) as required by the Western</p>	
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	<p>Australian Planning Commission (WAPC) <i>State Planning Policy 4.2 – Activity Centres for Perth and Peel</i> (SPP4.2) or any supporting traffic assessment.</p> <p>Matters for Consideration As currently proposed, the amendment is not consistent with the City’s strategic planning framework and an assessment of the potential economic and related effects of a significant retail expansion on the network of activity centres in the locality has not been undertaken. The following matters provide further discussion around our particular concerns. 1. Retail Sustainability Assessment Clause 6.5 of the WAPC’s SPP4.2 defines and explains the role of an RSA as follows: <i>A Retail Sustainability Assessment (RSA) assesses the potential economic and related effects of a significant retail expansion on the network of activity centres in a locality. It addresses such effects from a local community access or benefit perspective, and is limited to considering potential loss of services, and any associated detriment caused by a proposed development. Competition between businesses of itself is not considered a relevant planning consideration.</i> Clause 6.5.2 of SPP4.2 requires the preparation of an RSA as follows: <i>(1) Major developments and scheme amendments or structure plans that provide for major development are to include a RSA. Furthermore, any proposal that would result in the total shop retail floorspace of a neighbourhood centre exceeding 6000m2 nla, or expanding by</i></p>	
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	<p><i>more than 3000m2 shop-retail n/a also requires a RSA.</i></p> <p>Clause 6.5.2 of SPP4.2 allows for a responsible authority to waive a requirement for a RSA where the proposed shop-retail floorspace is substantially within the walkable catchment of a passenger rail station, in view of the scale and likely impact of the proposal. As the proposal is not within the walkable catchment of a passenger railway station Clause 6.5.2 of SPP4.2 does not apply to the subject site.</p> <p>Although there are applicable exemptions that would not require an RSA to be provided, these do not apply in this instance.</p> <p>A Retail Needs Assessment (RNA) has been prepared by Pracsys to support the proposed amendment, however, this is not considered to be appropriate and provides an insufficient amount of relevant detail for the City's consideration.</p> <p>Based on the requirements of SPP4.2, an RSA is required to support the proposed amendment.</p> <p>Further, the applicant's submission and supporting RNA provided were undertaken prior to COVID19 State of Emergency, and as such, is no longer relevant. Given this, the proposed amendment should not be supported until such time that a better understanding of the longer term implications of COVID-19 has/will have on the retail sector.</p> <p>2. Supporting Traffic Information</p> <p>The proposed amendment is not supported by any traffic analysis. The WAPC's Transport Assessment Guidelines indicate that at least a Traffic Impact Statement, or more likely a Transport Impact Assessment is required as a result of a proposed amendment seeking to facilitate a future development with an additional shop/retail floorspace of 3,270m2 NLA.</p> <p>The proposed amendment will allow for a number of additional land uses to be considered at the</p>	
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	<p>subject site in the future, which are land uses that can generate a much larger volume of traffic. This is detailed within table 1 of the WAPC's Transport Assessment Guidelines below and indicates that the proposal will have a moderate – high impact based on the additional shop/retail floorspace achievable.</p> <p>3. Integrating Development</p> <p>We note that a future development proposal at the subject site will be unlikely to integrate with the existing Wattle Grove Village Centre to the immediate south of the subject site. Existing development at Lot 191 (No. 332) Hale Road has only recently been completed and does not allow for any vehicle or pedestrian connections between the existing and future shop/retail floorspace proposed. In the event that additional shop/retail floorspace at the subject site is enabled through the proposed amendment, the City needs to be aware of the potential integration issues that will occur as part of the development application process. In reality, the Wattle Grove Village Centre will be made up of two distinctly separate centres, with inadequate vehicle and pedestrian connections being able to be provided between two areas where products and services are provided to the community. The appropriate integration of shop/retail floorspace is a key requirement and cannot be overlooked as it would be contrary to the WAPC's SPP4.2 which states that, <i>'Neighbourhood and local centres play an important role in providing walkable access to services and facilities for communities'</i>.</p>	
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	<p>Furthermore, portions of the Wattle Grove Village Centre remain undeveloped despite having the ability to provide additional shop/retail floorspace in this location. The amendment, if approved, may exacerbate vacancies in the existing centre under current and likely future economic circumstances as existing and potential tenants don't renew or seek leases on the basis of speculation associated with the delivery of future floorspace in this location. This would then have the effect of reducing the levels of retail and other services to the catchment population indefinitely.</p> <p>4. Planning for Aged Persons The City's Local Planning Strategy and Age Friendly Strategy and Action Plan specifically identifies the need to plan for the City's existing and future aged population within the local government area. The City's Local Planning Strategy recognises the need to plan for aged persons and the Applicant's submission responds to this by including various extracts from the Local Planning Strategy in this regard. The proposed amendment seeks to change the designated land use at the subject site to allow for a potential development of a supermarket, medical centre, community hub and a tavern. This will result in a reduced area of 'Mixed Use' zoned land and therefore reduce the ability to provide aged/dependant dwellings or aged residential care land uses at the subject site in accordance with the City's overarching development aspirations set out in its Local Planning Strategy.</p> <p>Summary The proposed amendment will substantially increase the existing shop/retail floorspace at the subject site, delaying any future development opportunities at Hawaiian's Forrestfield from occurring in the</p>	
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	<p>short to medium term.</p> <p>Following our review, we are of the opinion that the proposed amendment should not be adopted by Council in its current form for the reasons identified below:</p> <ul style="list-style-type: none"> • The proposed shop/retail floorspace expansion represents a substantial increase and is not appropriately justified as a RSA has not been prepared in accordance with the WAPC's SPP4.2 requiring this. • The proposed amendment, floorspace expansion and potential land uses that may locate at the subject site as a result of the proposed amendment will likely have a moderate to high impact on the surrounding road network. As such, at least a Traffic Impact Statement but more likely a Traffic Impact Assessment would be required in accordance with the WAPC's Transport Assessment Guidelines to support the proposal. • The subject site immediately adjoins the existing Wattle Grove Village Centre to the south. There are limited opportunities for the existing centre and a proposed future development to appropriately integrate with one another. The lack of integration will result in a poor planning outcome and potentially increased localised vehicular movements between the subject site and Wattle Grove Village Centre should the amendment be approved. • The proposed amendment will facilitate a potential future supermarket development and tavern at the subject site. This will reduce the existing area available at the subject site to facilitate housing opportunities for a growing aged population in the City and this is contrary to the City's Local Planning Strategy in this respect. 	
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	<p>It is respectfully requested that the Council do not proceed to adopt the proposed amendment in its current form and request the applicant provide a RSA to support the floorspace expansion along with an appropriate traffic analysis to support the increased activity and vehicle trips generated.</p>	
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