

Submission Table – Local Planning Policy 32 – Public Open Space

No.	Submission	City Response
1	<p>The Department of Mines, Industry Regulation and Safety (DMIRS) has determined this proposal raises no significant issues with respect to mineral and petroleum services, geothermal energy and basic raw materials.</p> <p>DMIRS lodges no objections to the above Draft Local Planning Policy 32.</p>	No objection noted.
2	As the Local Planning Policy applies only to residential subdivision and development DPIRD has no specific comments to make but notes the opportunity for well-planned Public Open Space to separate new residential development from established orchards to minimize potential land use conflict and health risks associated with accidental spray drift.	Noted.
3	<p>Thanks for forwarding through the City's draft policy for comment.</p> <p>The Shire has been preparing an amendment to its LPS which seeks to rescind the 2001 POS Strategy and insert new POS strategies. Information has been yielded throughout this process which may also be useful for your consideration of the policy. Therefore, the following is offered as informal, officer-level advice only. Feel free to contact me should you wish to discuss any of these points further:</p> <ul style="list-style-type: none"> • Page 4 says the Policy has been prepared under the Regs. Page 5 says it has been prepared under LPS3; • The Commission has different degrees of regard for Local Planning Policies compared to Local Planning Schemes when determining the allocation and management of POS; • Is the provision of POS in industrial areas dealt with by the City by another policy/strategy or the scheme?; 	<p>Pg 4 – the LPS3 is prepared in accordance with the <i>Planning and Development (Local Planning Schemes) Regulations (Regs)</i>, so they are interchangeable, however reference to LPS3 removed and Regs reference retained.</p> <p>The Policy provides more detail than what the LPS3 contains in regard to POS, however as any Local Planning Policy it will be given due regard and there is an element of discretion when applying. POS provision is a well established practice by the WAPC Position Statement - Cash-in-Lieu of Public Open Space (WAPC, 2020 and Development Control Policy 2.3 Public</p>

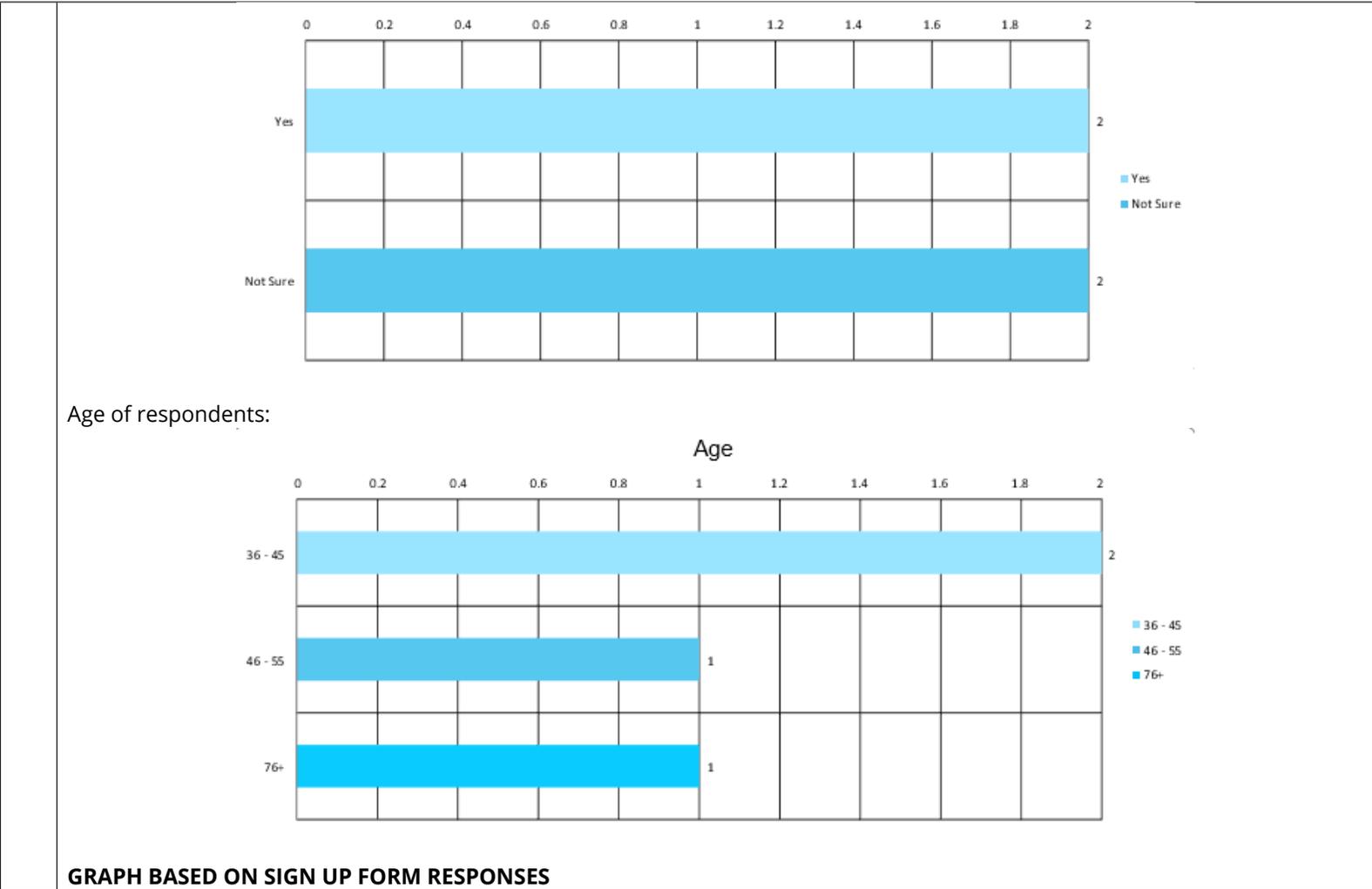
<ul style="list-style-type: none"> • On page 9, the symbols "<" and ">" are a little confusing. For example, the phrase: "exceeds >1 ha" reads as "exceeds greater than 1 hectare." If the ">" symbols is removed, it reads "exceeds 1 hectare" which seems to be the intent; • the Shire has recent examples of small areas of POS being created to protect important heritage and cultural features i.e. the 4,000m² threshold proposed by the policy may benefit from further qualification; • there appears to be some proposed duplication of matters/provisions that appear in the contemporary planning framework. However, these may be intentional; • recent experience is that the State is aiming to divest itself of management responsibility for unmanaged Parks and Recreation Reserves. It is noted that the City intends to make recommendations to the Commission to establish new Parks and Recreation reserves in section 2.3.3 which may attract a subsequent request for the City to manage the same; and • In section 2.3.4 POS and Parks and Recreation Reserves are "reservations" rather than "zones" 	<p>Open Space in Residential Areas (WAPC, May 2002), which this policy supplements. This policy only relates to ceding of POS in Residential areas. There is not provision for POS in Industrial areas except through Structure Planning or urban water management requirements. Pg 9 – symbols removed.</p> <p>2.1.2 Amended to include a new point "Where there are significant historical or cultural values present a land contribution will be requested where it is considered of benefit to the wider community to retain the values."</p> <p>Policy has been significantly edited and reformatted to remove duplication of provisions except where considered of benefit to applicants.</p> <p>Any divestment of reserves by the State or City will be considered on a case-by-case basis.</p> <p>Policy updated from zone to Parks and Recreation reserve throughout document.</p>
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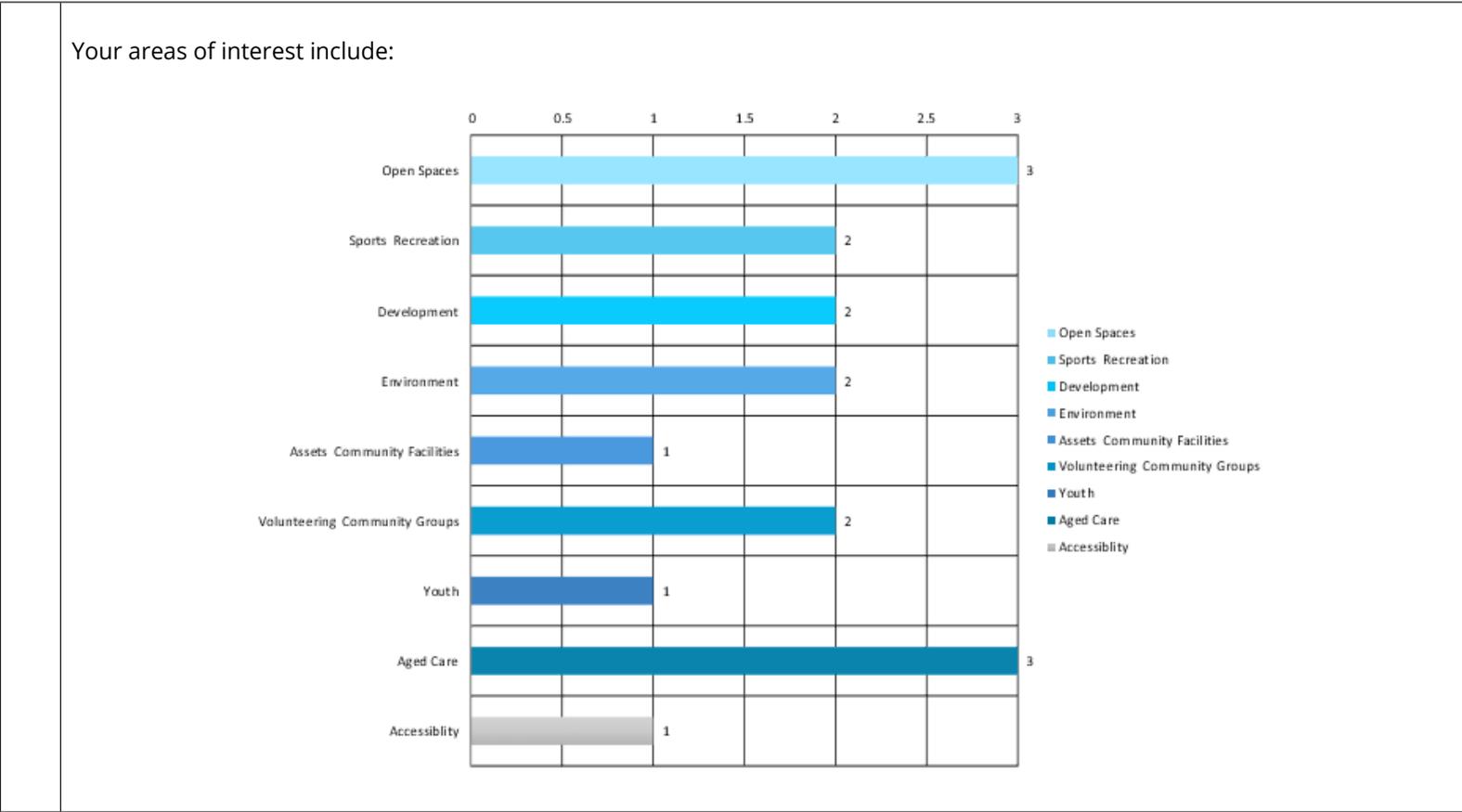
<p>4</p>	<p>The Water Corporation notes and has no concerns with the content of the policy.</p> <p>We particularly support the POS design provisions that recognize POS areas may perform vital urban water management or other environmental purpose. POS areas in the urban landscape are important for local climate moderation and maintenance and augmentation of tree canopy cover.</p> <p>It is recommended that the list of requirements at 2.5.3 (Design of POS) should also include recognition that, in some locations, POS areas may also be suitable to accommodate, or be co-located with, utilities such as wastewater pump stations, gravity sewers and water mains.</p> <hr/> <p>In addition to our submission letter sent previously, here are some further comments from the Water Corporation's Waterwise Cities team.</p> <ul style="list-style-type: none"> - Acknowledge that the City has been an endorsed Waterwise Council for over 10 years and are working towards Gold recognition. - Acknowledge the City identified a need for additional irrigated sports-fields as part of its Hartfield Park Master Plan in 2010. As the groundwater allocation for the area was capped and fully utilised, the City developed an alternative water source (MAR using harvesting stormwater) to ensure the long-term sustainability of the site. - Support Policy Objectives (section 1.5) including POS design to demonstrate environmental sustainability and incorporate WSUD principles; Design of POS (section 2.5.3) referring to best practice in water conservation, harvesting, re-use and irrigation; Sport POS design (section 2.5.4) stating the playing field component of Sport POS sites should have access to a water 	<p>Noted.</p> <p>CSIRO Climate Change information document noted.</p> <p>DLGSC's Public Parkland Planning and Design Guide (WA) considered address as part of Policy and Schedule 1 provisions.</p> <p>Irrigation considered addressed in Schedule 1 Information Required which refers to "site layout (irrigation / sub-soil drainage design)"</p>
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	<p>supply and water licence transferable to the City, suitable for the irrigation of an appropriate amount of turf and landscaping.</p> <ul style="list-style-type: none"> - Support the policy stating that turf should be minimised in areas not reserved for sport space, which will help reduce water demand. The City may consider exceptions to this where the proponent has a licence to take water issued by DWER or has applied for a licence to take water and confirmed that sufficient water is available from the groundwater resource, unless an alternative water source is proposed. - Support handover of POS from the developer to the City which includes a requirement to provide the City with annual metered bore water usage data for any irrigated POS during the term of their maintenance period, to demonstrate compliance with the water licence allocation for that area. - The policy should acknowledge the impact of climate change, including reduced groundwater availability and increasing temperatures. Planning and design of POS needs to consider water security and climate resilience. CSIRO provides an outlook for Australia, available at https://www.csiro.au/en/research/environmental-impacts/climate-change/Climate-change-information - Section 2.5.3 Design of POS should include reference to DLGSC's Public Parkland Planning and Design Guide (WA), available at https://www.dlgsc.wa.gov.au/department/publications/publication/public-parkland-planning-and-design-guide-(wa). This guide includes recommended waterwise practices such as soil amendment, hydrozoning and best practice irrigation systems, which need to be considered in the early stages of POS design. - Information required (section 2.2) could include an irrigation demand estimate based on the area of parkland under irrigation. - The policy should include reference to the issues surrounding use of potable (scheme) water for irrigation of POS. The Water Corporation's 	
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	<p><i>Policy Water for Public Open Space Irrigation</i> provides that the Corporation may provide scheme water for POS irrigation as a last resort, subject to other irrigation options need to be considered.</p>	
5	<p>Main Roads has no objection to the proposed Local planning Policy and offers the following comment:</p> <ol style="list-style-type: none"> 1. Main Roads recommends section 2.5.3 Design of POS be amended to include guidance on POS design when located abutting a State Road, land reserved as Primary Regional Road in the Metropolitan Region Scheme, and land reserved by a Planning Control Area. <p>It is recommended the following wording is included, where POS is located abutting a State Road or land reserved in a Planning Control Area or as a Primary Regional Road in the Metropolitan Region Scheme, ground levels on the road reserve boundary are to be maintained as existing, and future road concepts taken into consideration.</p>	<p>No objection noted. Recommended phrasing around road levels added to Schedule 1 – 5.1 Design of POS.</p>
6	<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.</p> <p>Given the Local Planning Policy seeks to ensure there is adequate and well distributed POS throughout the City of Kalamunda, the policy provides an opportune mechanism for the coordination of bushfire risk to ensure that it does not result in the introduction or intensification of development or land use in an area that has or will, on completion, have an extreme BHL and/or BAL-40 or BAL-FZ.</p>	<p>Noted. All applications as required under State Planning Policy 3.7 Planning in Bushfire Prone Areas will be referred to DFES as needed on a case-by-case basis.</p>

	<p>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 the Guidelines for Planning in Bushfire Prone Areas, is or can be achieved.</p> <p>The BMP should be prepared 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>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 comment prior to the City's endorsement of the Local Planning Policy.</p>	
7	<p>ONLINE SURVEY RESULTS SUMMARY</p> <p>Are you supportive of the policy?</p>	





Response	Are you supportive of the Policy?	Why?	What do you like about the Policy?	Is there anything within the Policy that you would like to see improved/changed/removed?	Do you have any additional comments that are important to finalising the Policy?	City Response
1	Not Sure	I think cash in lieu for properties <4000 metres where it is three or more lots is unfair. Either the city wants these types of subdivisions or they don't. Personally I don't. But don't discourage by a POS cash in lieu scheme. There are development fees and subdivision fees etc, if it costs more for the City for these types of expansions, then incorporate it in the	>10000 to include POS for everyone.	Remove POS requirements for <4000		<p>This policy applies to all residential subdivision which creates an additional three or more lots. The City will not seek a POS contribution for subdivisions of an additional one or two lots, boundary realignments or amalgamations where no additional lots are created.</p> <p>The 4000m2 cash-in-lieu threshold is to prevent the ceding of land for POS which would be too</p>

		actual fees. But if the City doesn't want the small lot development, don't allow it in the planning scheme.				small to sufficiently provide benefit to the community. The 10% POS contribution for residential subdivision is a requirement under State Planning Policy 2.3 – Public Open Space in Residential Areas.
2	Yes	I have researched the psychological and physical benefits associated with humans in every day contact with nature and animals and the results are remarkable. Humans who have easy access to green trees, gardens, sky, water, insects and animals are physically and psychologically	I like the fact that the City of Kalamunda is aware of the importance of resident and ratepayer health (mental and physical).	I would actually like to see the City implement the policy. I believe (with evidence) that the City is not "walking the talk". While verge trees and gardens are abundant in Kalamunda, High Wycombe and Forestfield are wastelands dearth of easy-to-reach green spaces for residents. Council land has been sold to developers (eg Dpt of Housing) and the suburbs are becoming concrete and brick jungles; meaning hot and unappealing (and therefore positively	Yes - what is the City going to do to increase green open space? Many ratepayers, myself included, grew up in the then Shire of Kalamunda when we actually had large	Comment in support of more green space in High Wycombe is noted. The process for delivering public open space is through cash-in-lieu contributions or ceding of land at subdivision stage. The City recently used some of these funds to upgrade Elmore Way Park behind the High

		<p>healthier. Every resident should have daily and "easy" access to enjoyable and safe walking and sitting areas in green environments.</p>		<p>contributing to psychological ill health of housing inhabitants). Other suburbs are planting trees in the middle of streets; this could be done. Other councils have abundant parks within a short walk of all residents and many have water with bridges and walk and cycle ways. The shopping centre at High Wycombe has a park behind it with two dog areas but all the other land (lot of it was swampy) has been sold to developers! This was an extremely stupid and short-sighted decision; this land should have been turned into a very large park and lake/swamp area for families.</p> <p>Fleming Reserve just doesn't measure up and is too far for people who live closer to Kalamunda Road to walk to. The shopping centre is full of fast food outlets and no healthy cafes and restaurants. We have not seen one decent cafe -</p>	<p>blocks, trees and parks. We were slimmer and fitter. Now many residents are lazy and fat. Having outdoor gym and play equipment and a lot of green space will help. A better City will attract better people (meaning less crime).</p> <p>Side point - I have a large property with trees and neighbours complain</p>	<p>Wycombe tavern into an accessible dog park and installed an additional 48 new trees and seven native <i>Xanthorrea</i> (grass trees), along with relocating two grass trees and one <i>Zamia</i> palm from a Department of Education project in Gooseberry Hill. The City also installed paths, lighting, sheltered seating areas, water fountain, fencing and dog agility equipment.</p> <p>The City has similar cash-in-lieu POS improvement projects underway, including Fleming Reserve.</p> <p>Support for a green urban environment and green bins is noted.</p>
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				<p>Kalamunda has a Dome and the lovely hotel. High Wycombe has a few bogan taverns - I mean; really! We're not all bogans in High Wycombe. The parking is asphalt with no trees (maybe a few) and no lovely garden areas to sit in. Where is High Wycombe's Stirk Park? Actually Stirk Park really should have cafes with outdoor sitting areas overlooking it and which have gardens/flowers etc.</p> <p>The swamp land behind the shopping centre and dog areas (looks like a developer site for over 55s) should be bought back the council and turned into a lovely green park with water and healthy cafes.</p> <p>Another issue are all the shopping locals in High Wycombe - can something be done to add value to each - green roof gardens and bars?</p>	<p>when I cut down a tree. I say to them "well, why don't you have trees?" They seriously don't have trees because they live in small houses on small blocks because the City of Kalamunda approved such felling of trees.</p> <p>Will the City buy back property from residents and create new and sensible green</p>	
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					<p>spaces? From a ratepayer's perspective, it looks to me like the Council just wants to earn more money via the collection of rates - whereas the irony is if you make suburbs more appealing and green, you attract better buyers and residents (including tenants). I seriously believe the City of Kalamunda is definitely not living up</p>	
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					<p>to its positioning statement of a "home in the forest"</p> <p>While I know I may sound grumpy, I do appreciate the effort the Council is going to improve the environment and I have seen some verge trees appear but more needs to be done. The Council also removed the green waste collection (you need to get a skip bin or go to</p>	
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					the two). If green waste collection started again then ppl may be inclined to grow trees again. Noted - the Walliston tip is probably the best I have seen in any council - it is seriously well run.	
3	Not Sure	I feel like there may be loopholes with the use of the 10%cash in lieu.	I like that the policy protects vegetation.	Protected vegetation that is fenced off is no longer able to be used by the public other than to look at. This needs to be reviewed.	I like that private residential subdivision won't have to contribute to the 10%, and I hope that I've understood this correctly	The policy applies to residential subdivision only. The 10% POS contribution for residential subdivision is a requirement under State Planning Policy 2.3 – Public Open Space in Residential Areas. Expenditure of POS is

					<p>required to be approved by the Minister.</p> <p>Support for protection of vegetation is noted, as well as consideration of how protected vegetation could be designed for residents to enjoy and interact with. Design of POS is considered on a case-by-case basis depending on the ecological values present. In some cases this may include fencing to prevent damage to protected species, while in other cases the City may consider installation of formal paths, a boardwalk or overlooking from a residential or commercial property which takes advantage of the view.</p>
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4	Yes	We need input to feel connected to			I would like to see more recognition of our ethnic pioneers n	Support for more ethnic pioneer recognition is noted.
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