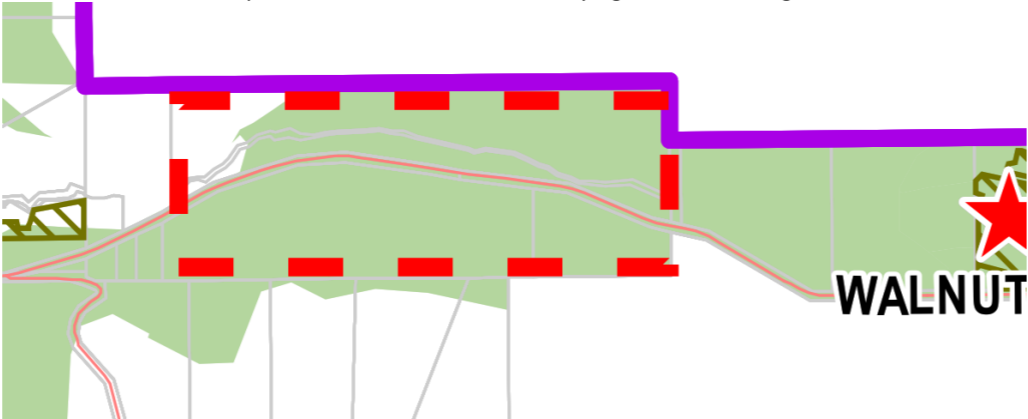



Attachment 1 - City of Kalamunda Submission
Pickering Brook and Surrounds Sustainability and Tourism Strategy
Part 2 – Facilitating Sustainable Economic Opportunities (February 2022)

Comment #	Report Section, Page	Submission
1.	Throughout	The use of the term “sustainable agriculture” appears in various parts, recommend that this be defined for the purposes of the Strategy.
2.	Environmental Sustainability	<p>The strategy does little to acknowledge impacts to environmental values associated with the strategy (clearing for nature-based tourism, agriculture, bushfire, road widening, servicing etc plus secondary impacts associated with these) and how these will be managed.</p> <p>There may need to be acknowledgement that there has been no technical environmental studies relating to flora, vegetation and fauna, or strategic assessment of the potential environmental impacts associated with the Strategy, or identification of local offset opportunities. Should this be a long term action of the State?</p>
3.	Executive Summary Pg. vi	<p>With reference to the final sentence and the recommendations: “The responsible State Government agencies and local governments are encouraged to action the recommendations as part of future business programs.”</p> <p>As noted in the City’s previous submission the recommendations are largely to undertake further studies or analysis, or to consider some other document, rather than some more concrete strategic actions.</p> <p>The identification of 12-18 month actions against 5 year actions is noted, however it is considered further prioritisation could be identified with implementation target / measures for each recommendation. Particularly the State Government actions. Where the implementation timeframe is unknown given uncertainty about funding etc, spell out the risks / limitations and provide aspirational timeframes and priorities.</p>
4.	Summary of Recommendations’ Map Pg. xiv	<p>a) Comment repeated from exposure draft (May 2021) - Exclude areas containing natural vegetation and fragmented (rural lifestyle lots) from the High-Quality Agricultural land investigation area.</p> <p>There are obvious examples of areas shown in the Priority Agriculture investigation area that contain, based on aerial photography, noteworthy environmental values:</p> 

			
		<p>b) The activity nodes need to be annotated so that it is clear what activity is being highlighted.</p>	
		<p>c) Include Heidelberg Park (Cnr Canning and Pomeroy Rd) as an activity node on the 'Summary of Recommendations' map. This site is zoned Urban and identified for residential aged care.</p>	
		<p>d) Include activity node for the Pickering Brook shops (existing local centre).</p>	
<p>5.</p>	<p>Recommendations Pg vii – xiii</p>	<p>a) General – There are arguably a number of actions that should be highlighted for 12-18 months and are achievable more immediately – eg. 19(i-iii) and 21(i).</p>	
		<p>b) Recommendation 1 doesn't mention the protection or improvement of water quality as a result of development applications. The City can support the management of stormwater drainage and water quality through the development application process. This also includes the provision of higher quality wastewater treatment systems. Within five years it is intended that the City will be undertaking catchment studies to guide overall stormwater management.</p>	
		<p>c) Recommendation 2</p> <p>Recommendation 2(i) Include DPLH / WAPC as the lead given the hierarchy of decision making in the planning framework.</p> <p>Recommendation 2(iii) This is administrative and does not warrant its own recommendation item.</p> <p>Recommendations 2(iv) and (vii) are similar and should be merged.</p> <p>Recommends 2(iv),(v), and (vii) Signage needs to be resourced. The emergency / evacuation wayfinding should be included as part of a tourism and area signage plan.</p> <p>General regarding Recommendation 2: Tourism uses will require Bushfire Emergency Evacuation Plans. DFES don't assess BEEPs and thus Local Governments need to be skilled in assessing evacuation plans. Should there be a recommendation to provide formal training and build capacity in this regard?</p>	
		<p>d) Recommendation 5 (i)</p>	

		<p>It is recommended that the Part 2 report incorporate case studies of recent development applications where issues have arisen due to wastewater requirements and differing advices from the DWER and DoH. The City would welcome and opportunity to provide summaries of these case studies for inclusion.</p>
		<p>e) Recommendation 6</p> <p>As acknowledged in the report, all infrastructure improvements are subject to the ability for the City to fund them, or acquire support funding.</p> <p>Recommendation 6(i)(a)(i) There are no plans to address Welshpool Road East west of Lesmurdie Road within five years.</p> <p>Recommendation 6(i)(a)(ii) Canning Rd will be upgraded with black spot funding in 2022. Further projects are being scoped and are to be delivered subject to funding. The overall cost of improvements to Canning Road has been estimated at \$6.6 million.</p> <p>Recommendation 6(i)(b) There are no regulatory signs appropriate to the presence of cyclists in the area. Community education and awareness therefor would need to be delivered through campaigns. The City is just concluding a 12-month program on road safety awareness that included cycling, with Commonwealth funding under the Road Safety Awareness and Enablers Fund. It is likely that more programs will be developed, subject to funding.</p> <p>Recommendation 6(i)(c) The City continues to deliver projects identified in its Bicycle Plan, and will be reviewing the plan in 2022/23. Many of the projects are significant in cost and require support funding from the State.</p> <p>Recommendation 6(i)(d) There are no key cycle routes in the Pickering Brook area, and training routes are not identified in the LTCN.</p> <p>Recommendation 6(ii) Projects are continually being scoped and funding sought as per normal operations.</p>
		<p>f) Recommendation 7</p> <p>i) Recommendation 7(i) This is identified by the Perth Hills Tourism Alliance, however, will require substantial “buy in” for Destination Perth as it requires a change to their constitution. The recognition can be influenced but not determined by Local Government/Perth Hills Tourism Alliance.</p> <p>ii) Recommendation 7(ii) This has already commenced through the Marketing Plan of the Perth Hills Tourism Alliance – the action will be ongoing.</p>
		<p>g) Recommendation 8</p> <p>Recommendation 8(i) Connections have commenced with Tourism Western Australia – farm gate workshop offered through City of Kalamunda in conjunction with Tourism Western Australia. Food and beverage trail – 3 already completed. Expectation to continue to support businesses.</p>
		<p>h) Recommendation 9</p> <p>Recommendation 9(i) and (ii) This already forms part of the Perth Hills Tourism Alliance regional website. Should the recommendation reflect an improvement to the current approach?</p> <p>Recommendation 9(iii) This is identified in the Perth Hills Tourism Alliance Marketing Plan. Should the recommendation reflect an improvement to the current approach?</p>

		<p>i) Recommendation 10</p> <p>Recommendation 10(ii) Dark Sky/Astro tourism – would need to include the Perth Observatory, a volunteer run organisation – key contact City of Kalamunda.</p> <p>Recommendation 10(iii) Building tour capacity has proven challenging – will need to identify new ways for this. Previously held tour development workshops were poorly attended. Funding for workshop to facilitate tours would need to be identified.</p>
		<p>j) Recommendation 11</p> <p>Recommendation 11(i) Further information required regarding this proposal and the report does not provide further detail. Zig Zag Cultural Centre site is constrained. What does a “showcase facility” look like?</p>
		<p>k) Recommendations 12 and 13</p> <p>Significant funding required for signage and way finding.</p>
		<p>l) Recommendation 14 (2)</p> <p>It is acknowledged that this recommendation includes reference to a “focus on safety”. As outlined in the City’s previous submissions, the City has experienced anti-social issues with other formalised lookouts and has introduced activation and safety management to address this. It is recommended that the report talks about the importance of Crime Prevention through Environmental Design for any future lookout investigations.</p>
		<p>m) Recommendation 16 (ii)</p> <p>As noted in the City’s previous submissions, there should be recognition of the need to work with State Government agencies to facilitate and support proposals for camping facilities on private land. Decision making in this regard requires a cohesive policy framework on bushfire, public drinking water source areas, planning and camping controls. It is acknowledged that the actions individually address some of these aspects, however the priority level and timing of these actions needs to be addressed in the recommendations.</p>
		<p>n) Recommendation 17</p> <p>Recommendations (i-iv) aren’t clear on the actions required for the City.</p>
		<p>o) Recommendation 21 (i) p) This recommendation should recognize the need for State / Local collaboration.</p>
		<p>q) Recommendation 22(i)</p> <p>DPLH should also be a responsible agency. Furthermore, the action could reference the need to facilitate dialogue between DPLH and DFES on issues that arise from planning proposals that challenge the planning framework and the outcomes envisaged by this Strategy, relevant to bushfire risk.</p>
		<p>r) Recommendation 23 (i)</p> <p>This recommendation references helping farmers manage impacts of climate change. It is considered that there should be a reference to also help farmers reduce the contribution of agriculture towards climate change.</p>
		<p>s) Recommendation 24</p> <p>Recommendation 24 (i) This is a critical action that is directly linked with recommendation 3(i) and (iii). The City is not in a position to recommend that Priority Agriculture land be identified for rezoning in the absence of a coordinated strategy regarding water availability.</p>

		<p>Recomemndation 24 (ii) This should not just be limited to cropping options. Consider reference to further education on waterwise practices and technologies to reduce consumption needs.</p>
6.	<p>Guiding Principles Pg 5</p>	<p>There is no mention of protecting environmental values (mentioned in objectives however), and no mention of sustainability.</p>
7.	<p>Bushfire Risk Management Pg 12 - 15</p>	<p>Later in the strategy (pg 76) it refers to clearing of vegetation to reduce bushfire risk. The strategy should include commentary in this section to ensure land uses are appropriately cited as to not warrant clearing of vegetation and minimise environmental impacts to reduce bushfire risk.</p> <p>Should there be recognition of the BPA mapping updates and CSIRO review?</p>
8.	<p>Soil and Land Capability Assessment Pg 18 -24</p>	<p>Soil and land capability assessment will need to also consider effluent disposal. Recommend referencing this element in the report.</p>
9.	<p>High Quality and Priority Agricultural Land Pg 15-25</p>	<p>Need recognition in this section that there are examples of priority agriculture soils capability overlapping with areas of native vegetation. It is noted that the proportion of State Government land is referenced, but not the limitations associated with existing environmental values. It is also acknowledged that DPIRD's analysis is ongoing, however Plan 10 does not exclude native vegetation extent data, that is readily available.</p>
10.	<p>Rural land for rural and residential purposes Pg 28-36</p>	<p>With regard to the 4th paragraph:</p> <p>The City of Kalamunda has expressed some support for rural landowners to be able to subdivide to facilitate construction of an additional (ancillary) dwelling. This proposal is inconsistent with SPP 2.5 and WAPC Development Control Policy 3.4: Subdivision of Rural Land (DC 3.4). Generally, the purpose of ancillary dwellings on rural properties is to provide additional accommodation/ dwellings necessary to support primary activities such as productive agriculture. The creation of separate lots to accommodate additional/ancillary dwellings may potentially result in the future on-sale of these lots/dwellings which could remove any ancillary relationship with the primary activity on the original parent lot.</p> <p>Request to rephrase the first sentence of this paragraph to: <i>"The City of Kalamunda has expressed some support for the planning framework to enable subdivision where it can be demonstrated that there is minimal impact on priority agricultural land, public drinking water sources, rural landscape values, land use conflicts and bushfire risk."</i></p> <p>The City's position was not to enable subdivision for the purposes of facilitating additional/ancillary dwellings, but rather to consider subdivision where additional dwellings are already capable of being considered under the Scheme, and considering the planning arguments with regard to subdivision, noting that scheme provisions could be introduced to control the undesirable affects of subdivision and further fragmentation of agricultural land. It is acknowledged a section has been introduced to recognize the role of Local Government Strategic Planning in further considering this issue.</p>
11.	<p>Pg 29</p>	<p>This section refers to the opportunity for private land to be subdivided and acquired as an environmental offset. The strategy should include measures to communicate these options with landowners and collect expressions of interest. This is an approach that could be used to offset impacts of the strategy itself, providing a net local benefit.</p>