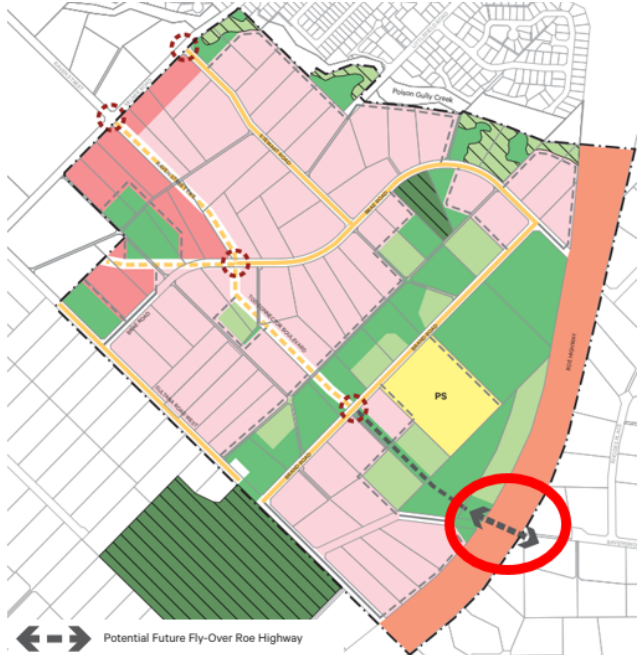


SUBMISSION NO.	SUBMISSION	CITY REPSONSE
1 (IN24/4AE8E3 A)	<p>NO OBJECTION</p> <p>The Water Corporation has no objections to the proposed establishment of a DCP for levying developer contributions in this area towards construction/upgrades to local roads, public open space and drainage.</p> <p>It is noted that the detailed Contribution Plan Report (December 2023) makes allowance for proportional costs towards “services” (including gas, Telstra cable, power cables, water mains, hydrants etc.). Presumably, this allowance is for the relocation of existing services if required as part of upgrading existing roads that benefit the whole DCP area.</p> <p>Where the subdivision creates new access roads, new underground utilities would ordinarily be installed by individual subdividers as part of their subdivision works at their cost rather than shared between subdividers. This aspect needs to be clarified.</p>	This understanding is correct.
2 (IN24/793817 DB)	<p>NO OBJECTION, recommended modifications</p> <p>In response to your correspondence received on 2 February 2024, Main Roads provides the following comments in relation to the proposed amendment and associated Development Contributions Plan (DCP).</p> <ul style="list-style-type: none"> • Main Roads is generally supportive of the Council's efforts to plan for the future of infrastructure requirements for this community. • The High Wycombe South Residential Precinct Development Contribution Plan Report (December 2023) discusses potentially extending a flyover across Roe Highway to future development of Maida Vale South. The following reference is to be removed. “Table 2 – Road Infrastructure Summary 	The phrasing adopted in the DCPR (and associated appendices) does not approve, nor assume an outcome with the “potential flyover”. Any references to the “potential flyover” are consistent with the APPROVED LSP, extract below. Therefore the requested modification has not been applied to the 2024 DCPR.

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>(RD04) TOD Connector (Edge of TOD Precinct – Roe Highway) Under 'Summary of Works' notes: The TOD Connector is a proposed new road and will form a route from Milner Road to Brand Road and potentially further across Roe Highway to connect the future development of Maida Vale South. For the DCP only the portion from Brand Road to Milner Road is to be included. Plans L01A and L13A in the DCP also indicated there is a 'future highway flyover'. All references to a flyover or crossing of Roe Highway must be removed from the DPC. There is no funding allocated to the Roe Highway flyover nor have Main Roads confirmed a flyover is supported for future construction in this location.</p> <ul style="list-style-type: none"> • Developers or entities undertaking modifications to the State Road Network are required to obtain a "Conducting Works on Road" approval from Main Roads. This is a third-party approval, which is a separate and distinct approval under Planning and Development Act 2005. It is further advised that Main Roads will require a 30-day review period to assess any revised documentation. 	
3	<p>NO OBJECTION</p> <p>Thank you for the above referral. The Department of Water and Environmental Regulation has considered the proposal and has no objections and no further comments.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
<p>4 (IN24/660C9 BE5)</p>	<p>OBJECTION We disagree totally with this document. We are the worst affected residents in this entire area living 67 meters from a so-called Light Industry Zone in Stage 1 without any protection from noise, vibrations, and emissions which we endure daily. Minister John Day approved Stage 1 on the condition that there would be no noise coming from businesses. In addition, when seeking approval for Stage 1 as an industrial area, the City of Kalamunda relied on the fact that our land was also going to be industrial, therefore eliminating any disruption to residential areas. The previous Director of Development Services at the City assured us that there would not be disturbances before 7am and after 5pm five days a week. The reality of living across from Stage 1 is vastly different, for example: We feel vibrations coming through our pillows at night from the trucks and forklifts at Golden Egg Farms. There is constant noise from trucks entering Golden Egg Farms at all hours of the morning and into the evenings, and noise from parked refrigerated trucks day and night. (We have been monitoring the situation for the city for the last eight years as requested by the city to do so, but the city has done nothing). How can a structural steel company be considered light industry? Paint fumes blow onto our property from their paint shop whenever there is a southwest wind blowing. Oversize trucks loaded with steel reverse into their premises without a spotter daily. The road is not wide enough for some of them to turn so they venture onto verges opposite. Sultana Road West is blocked in both directions when this occurs. Why does the city insist on going ahead with residential development within such proximity to a structural steel company?</p>	<p>The zoning and ongoing compliance issues are beyond the scope of Amendment 113. Nonetheless, the City's Compliance Team continues to monitor land use in the area to ensure compliance with LPS3 and existing approvals. Landowners are encouraged to contact the City's Approval Services to discuss this matter.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>When is the city going to step up and admit the fact that Stage 1 is not Light Industry? It's time for the city to start doing their own monitoring. State Planning Policy requires separation between industry and residential, especially for health reasons. We are suffering from a failure to enforce this policy. Please explain why the city is not adhering to this policy.</p> <p>An unanswered question about an “administrative correction” of about \$510,000 for the widening of Sultana Road West was in the December newsletter. We submitted to the city that the DCP should not go out for advertising until the error was rectified, as this is misleading. The city simply told us to mention it in our submission.</p> <p>Properties in the area have been on the market during the last few years, but unable to sell - this includes our home on Sultana Road West. The real estate company we engaged approached some property developers for indications of interest. The developers' response was that residential development is unviable with Light Industry opposite. When will the city acknowledge market realities and accept that residential R30/R60 development in this area is unviable.</p> <p>Having a 30-year DCP is beyond belief. Did the planning minister give his authority for such a document? State Planning Policy says that DCP timeframes should not exceed 10-years. A 30-year DCP means that the pain and suffering of existing residents and landowners will be prolonged indefinitely. Does the state government support this? It seems to us that the justifications given by the CoK in support of a 30-year DCP only highlight the fact that this whole precinct is unsuitable for residential development. Why are you persisting with this plan, when the factors that make the</p>	<p>The advertised DCP was revised to rectify this error. RD09 was updated from a previously published (April 2023) \$511,363.88 to \$1,022,727.76 (December 2023).</p> <p>In 2023 the City engaged the services of an independent property advisory consultancy, to undertake a Feasibility Analysis for DCA2. The investigation used financial modelling and stakeholder engagement to understand development viability within DCA2, in accordance with the approved LSP, ultimately concluding the proposed contribution rate is viable to enable the development of DCA2.</p> <p>The City has reconsidered the proposed lifespan of 30-years, concluding the protracted lifespan is imperative to ensure an equitable and feasible DCP. The data suggest that 25% of DCA2 will be developed, and consequently make a development contribution within the first ten years. A 10-year lifespan would therefore be insufficient to collect funds necessary for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>precinct unsuitable for residential, would also make the area highly sought after industrial land?</p> <p>The macroplan analysis of the proposed DCP points out the problems with the number of contributions sought and the length of the plan. They suggest that residential development is unviable and query whether planned use of the land should go back to industrial use. The city engaged macroplan for this analysis. Why doesn't the city accept the views of its own consultant. Failure to do so is causing serious economic loss to existing landowners.</p> <p>Does the city still intend to add a notification to the titles of the first row of lots in Sultana Road West warning of the potential for higher-than-normal noise levels from light industry across the road? This will destroy the value of our homes. Why should we be penalised when this has been caused by the city's negligent planning decisions?</p> <p>The proposed DCP must be rejected. We cannot go on living this way, and if it is approved this DCP will seal our fate. Someone must take responsibility because as we see it no one seems to care about the welfare of residents.</p> <p>Attached verbatim above submission 9.</p>	<p>The report notes that market forces would likely favour a light industrial outcome, however the strategic direction established as part of the METRONET Program and further reinforced through structure planning, recognise an urban land use direction for the broader precinct.</p> <p>Within Volume 1, Table 3 - Conditions of Subdivision and Development of the Local Structure Plan include an item for 'Other Noise Sources':</p> <p><i>"5.2 An acoustic assessment and management plan are to be undertaken and implemented to the satisfaction of the local government at the subdivision and/or development stage to investigate and respond to noise impacts for lots in proximity to Sultana Road West."</i></p> <p>An acoustic assessment and management plan will inform the ultimate requirement for notifications at the subdivision phase.</p>
<p>5 (IN24/4E0E05 80)</p>	<p>DFES Ref: D33150</p> <p>Dear Sir/Madam,</p>	

SUBMISSION NO.	SUBMISSION	CITY RESPONSE
	<p>I refer to your email dated 5 February 2024 in relation to the referral of Amendment No. 113 to City of Kalamunda Local Planning Scheme No. 3: High Wycombe South Development Contribution Area 2 (DCA2) and associated Development Contribution Plan Report.</p> <p>It is unclear from the documentation provided if the City of Kalamunda has applied State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP 3.7) to this proposal. Given the proposal seeks to include infrastructure and administration costs within DCA2 which may not be considered an intensification of land use, the application of State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7) may not be required, in this instance.</p> <p>Please note that the application of SPP 3.7 is ultimately at the discretion of the decision maker.</p> <p>Thank you for providing us with the opportunity to make a submission, DFES has no further comments.</p>	<p>The implications of SPP3.7 are beyond the scope of a DCP, and consequently, Amendment 113. However, relevant considerations have been made through the HWS Residential Precinct LSP.</p>
6 (IN24/536E33 79)	<p>We would like to express our strong disagreement with the proposed DCP and the handling of this planning process by the City of Kalamunda (CoK).</p> <p>The mismanagement of this area has been on-going for over 18 years. What initially was proposed as light industrial land near the airport and marshalling yards has now become an urban planner's plaything.</p> <p>The area is 12kms from the CBD, next to Perth Airport, a new train station and there is a housing/land shortage crisis. Factors that most State or Local Governments would capitalise on and fast track</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>the development potential of the area.</p> <p>The current DCP documents and Structure plans contain many questionable irregularities, time-frames and non-compliance with current planning laws that has sterilised the area.</p> <p>The CoK’s proposed 30-year time-frame to develop the area is based on a small pocket of land in Wattle Grove. A time-frame that’s highly questionable given the popularity of the “Bushmead” and “Hales” developments within the city, neither of which are close to the High Wycombe train station.</p> <p>DCP’s usually have a 10-year lifespan, CoK wants 30-years. Developments must have 10% public open space, CoK wants over 30%.</p> <p>Average developer contribution rates in the metro area are below \$30/sqm, CoK wants close to \$90/sqm.</p> <p>DCP’s must only include necessary infrastructure required for development, CoK wants to include conservation corridors and ecological green space.</p> <p>The DCP appeared to be rushed in its final stages due to the departure of its architect, the Director of Planning Services.</p> <p>The area is bounded by non-compliant General Industry on its Southern boundary.</p> <p>The new Perth Airport parallel runway adds noise abatement requirements on development.</p> <p>These criteria render the area close to being unviable for residential development.</p> <p>I’m sure other submissions will put a finer tooth comb through the details than we have and highlight other deficiencies.</p>	<p>The City has not been made aware of any specific irregularities that impact on the proposed DCP.</p> <p>The proposed 30-year lifespan is informed by a Population Yield Analysis Report, reported in 2023 by an independent consultant. The City has reconsidered the proposed lifespan of 30-years, concluding the protracted lifespan is imperative to ensure an equitable and feasible DCP. The data suggest that 25% of DCA2 will be developed, and consequently make a development contribution within the first ten years. . A 10-year lifespan would therefore be insufficient to collect funds necessary for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6.</p> <p>No two DCPs are alike; consequently, accurate comparisons aren’t possible. Rather than compare the proposed contribution rate to others with the Perth Metropolitan Region, the City has commissioned the 2023 and 2024 Feasibility Analysis’, which have ultimately determined that the proposed contribution rate is viable to enable the development of DCA2.</p> <p>The land use zoning and suitability is beyond the scope of Amendment 113, which seeks to introduce a DCP.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>What should be a golden opportunity for the CoK has become a planning disaster and a nightmare for developers and landowners to navigate.</p> <p>The often touted problem of “fragmented ownership” as the source of all problems, is a furphy, as nearly all landowners are keen to sell and willing to negotiate with genuine developers.</p> <p>The CoK and local councillors, refuse to hold a public meeting to address the situation and insist on fragmented meetings with individual landowners or small groups. Some landowners that have made the effort are often dismissed or banned from further enquires.</p> <p>With the CoK’s 30-year time-frame, there seems no end to the process.</p> <p>A solution to rectify the situation, that is gaining momentum with landowners and politicians, is a return to Light Industry zoning. If, as per the CoK’s investigations, residential development is not viable, then a return to the initial plan seems a logical step.</p> <p>There is strong demand for industrial land, the General Industry boundary problem is resolved, Airport noise is not an issue and it gives landowners a quicker pathway to move on than the CoK’s currently proposed 30-year timeframe.</p> <p>The ratepayers money that is being wasted on this folly needs to cease and a real solution found.</p> <p>‘Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
7 (IN24/50C5F7 3F)	<p>Dear Sir/Madam,</p> <p>Re: High Wycombe South DCA 2 - DCP Submission - [REDACTED] [REDACTED] Milner Rd, High Wycombe</p> <p>We act for the owners of the above properties, and in that role we lodge this submission on the above advertised proposal.</p> <p>We note that the Development Contribution Plan (DCP) arises out of the Local Structure Plan (LSP) that the Council has developed for the subject area. We acknowledge that the LSP has evolved over some years. Part of that evolution has seen a "Neighbourhood Connector A" road placed over our clients land (Raven St extension - identified as RD03 in the DCP) which was not proposed in earlier versions of the LSP. This change is reflected in numerous places in the DCP document where some plans don't show it and some do.</p> <p><u>Raven St Connector (RD03)</u> The placement of RD03 on Lot [REDACTED] has had a significant negative impact on our client's land for the benefit of others. The primary purpose of this submission is to seek recognition of this impact and a fair and equitable way of responding to it.</p> <p>We note in Table 2 of the DCP report that RD03 is identified as a road that will be paid for by the DCP at 100%. It acknowledges that the creation of this road will involve acquisition as well as construction. The DCP contribution column in Table 2 matches the total construction cost amount contained in Appendix B. This appears appropriate. However, the method of calculating the land acquisition for new roads (s.2.5.1 of the DCP report) does not provide for the land acquisition to be a 100% DCP cost.</p>	<p>The City has not been made aware of any specific irregularities within this submission that impact on the proposed DCP.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Section 2.5.1 states that access streets (local roads) will remain, as is usual subdivision practice, a cost entirely the responsibility of the subdivider. The reason for this is that the local road, contained within a 15m wide road reserve, provides the road frontage to the residential lots that use it for access. Our client has no objection to this.</p> <p>Section 2.5.1 further states that, whilst the DCP will pay for the Neighbourhood Connector road, a 24.4m wide road whose purpose is receive lower order road traffic to connect that traffic to neighbourhoods and towns ("Liveable Neighbourhoods", Table 4). In this case, specifically to act as a feeder road to the High Wycombe train station. However, the DCP as advertised will not pay the full cost of acquisition. It argues that the subdivider would be required to create a 15m wide road reserve to service the lots created in their subdivision, so the obligation of the DCP should only be for the 9.5m additional width. This fails to take into account four factors:</p> <ol style="list-style-type: none"> 1. The alignment of this road is fixed by the LSP when a subdivision design involving only local (15m wide) roads may have used a different, more efficient road system; 2. RD03 is proposed to carry 6,000 vehicles per day by 2050 and will obviously have to be designed to carry that volume. Liveable Neighbourhoods prohibits vehicles from reversing onto a Neighbourhood Connector A where traffic volumes are 5,000 - 7,000 vpd unless specific protected reversing spaces are provided in the road construction from larger lots using paired crossovers. The densities proposed in the LSP will result in very small lots minimum density R30, or 300m² on one side and R60, or 150m² on the other; 	

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	<p>3. Not only is the Raven St extension lost to the owners as developable land, and as land providing road access to developable land, but the owners have to provide alternative road access to lots they create meaning that the Raven St extension provides absolutely no use or value to the owners in terms of the lands subdivision potential; and</p> <p>4. The return on sale of the lots fronting a main road are reduced due to the reduced amenity created by the higher traffic volumes of the road, regardless of whether vehicular access is allowed or not.</p> <p>The fairness of the method of payment to owners on whose land a Neighbourhood Connector A road is placed needs to be assessed on the basis of not being allowed to have vehicular access onto the road, other than potential legacy access (historical house access). Lots fronting the road have to be accessed by either a service road running parallel and alongside the Local Connector A road or a rear laneway. The notional 15m cost "discount" on the 24.4m road is thereby invalidated. To be fair and equitable, the DCP acquisition cost of the Local Connector A road should be 100% of the value of the full 24.4m road reservation.</p> <p><u>Milner Rd / Raven St Roundabout</u> The LSP also proposes a roundabout at the intersection of Milner Rd and the existing and proposed Raven St (INT02). This also directly affects Lot 49 and potentially Lot 48. We note that the cost of its construction will attract a 61.43% contribution from the DCP. We understand that this is because the other side of the roundabout is within the TOD Precinct (outside the DCP area). We understand that the TOD Precinct will be responsible for the balance of the cost. Our clients have no objection to this provided the land acquisition costs for our client's land are paid at 100%. We</p>	<p>When establishing the DCP, the City is required to apply the most equitable methodologies for administration. The road acquisition methodology, as outlined in the DCPR, provides the most equitable outcome for acquiring land for DCP road upgrades.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>would note in support of this that if the road was to be a local road, a roundabout would not be necessary, so any "discount" (as discussed above) would not be fair or equitable.</p> <p><u>Milner Rd Upgrading</u> We note that Milner Rd, which is the current frontage for Lots [REDACTED], is proposed to be classified an Integrator Broad (RD01). It's widening is proposed on the north-western (opposite) side of the road within the TOD Precinct. We acknowledge that this doesn't affect our client's properties and support this design.</p> <p><u>Open Space</u> There is reference in the DCP and the LSP to Public Open Space, Local Open Space, Environmental Conservation and Parks and Recreation. We acknowledge the comment in s.2.3.1 that the WAPC requires 10% POS to be given up free of charge as part of any residential subdivision but due to the fragmentation of land-ownership the POS needs to be consolidated to be of value to the community who will use, and this needs co-ordination. Hence it has been included in the DCP.</p> <p>We also acknowledge and support the exclusion of the District Open Space / Sporting Precinct, Environmental Conservation, Bush Forever and Conservation Category Wetland lots. We would also submit that the pedestrian connection through the Bush Forever land should also be excluded. These are items that have alternative methods of creation achieved through a variety of mechanisms and would result in a higher financial cost to the landowners if they were imposed as part of the DCP. The DCP cost is already high and increasing it would only threaten the feasibility of development of an area already made difficult by land fragmentation and regular development costs.</p>	<p>The DCP currently proposes to acquire all land required to facilitate INT02.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p><u>Net Contribution Area</u> Section 4 spells out the method for calculating contributions. It states that they will be based on Net Contribution Area (NCA).</p> <p>"In calculating a landowners NCA and the total area of land in the DCA that is liable to this DCP, the following land is identified as unavailable for development and therefore excluded from the NCA due to:</p> <ul style="list-style-type: none"> a) Classification as 'Environmental Conservation'; b) Classification as 'Local Open Space'; c) Existing and approved local roads, inclusive of widening and realignment requirements; d) Drainage basins required in accordance with the approved Local Water Management Strategy; e) Identified for public purposes -- Primary School; and f) Portions of land which are otherwise constrained for development due to their size, shape, tenure and access limitations." <p>We note that this list does not include reference to proposed new roads contained in the DCP, eg, the Raven St extension. Clearly these roads are "unavailable for development" and as such should, in our view, be included. It may be that the reference to "realignment requirements" in point (c) is intended to include these, but it isn't clear. We would request that the wording be amended to specifically include proposed new roads as listed on Figure 5- Road Infrastructure Map.</p> 	<p>The Net Contribution Area (NCA) methodology has been modified in Section 4.2 of the DCPR (Attachment 2) as follows:</p> <p><i>"In calculating a landowners NCA and the total area of land in the DCA that is liable to this DCP, the following land is identified as unviabale for development and therefore excluded from the NCA:</i></p> <ul style="list-style-type: none"> <i>a) Classification as 'Environmental Conservation'.</i> <i>b) Classification as 'Local Open Space'.</i> <i>c) Existing approved roadsAll roads identified on the High Wycombe South Local Structure Plan Map, inclusive of widening and realignment requirements.</i>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Conclusion Our clients would prefer not to have this LSP placed over their land. It has resulted in a significant loss in land value for them. That said, they are pragmatic and accept that they can't change the situation. They are concerned that the land needed to benefit the broader local community (once subdivision and development takes place) should be paid for by that broader community. So if a new Connector road has to be built across their property, which will provide no benefit to them in terms of their subdivision, but will in fact negatively impact on the subdivision of their land, they should be fairly compensated for it. We submit that the following modifications be made to the DCP:</p> <ol style="list-style-type: none"> 1. The DCP pay the value of the total area of the Road RD03, the Raven St extension, land requirements and other new roads listed on Figure 5, not a proportion; 2. Clarification be provided that the full land requirements for all roundabouts will be paid for by the DCP; 3. The only open space requirements within the DCP to be for the 10% POS; and 4. The Net Contribution Area exclusions include specific reference to roads required to be created as listed on Figure 5. 	<p><i>d) Drainage basis in required in accordance with the approved Local Water Management Strategy.</i></p> <p><i>e) Land identified for other public purposes (i.e. primary school site).</i></p> <p><i>Portions of land which are otherwise constrained for development due to their size, shape, tenure and access limitations. "</i></p> <p>Refer to the City's responses above.</p> <p>Refer to the City's responses above.</p> <p>While the DCP proposes to coordinate a total of 15% of LOS throughout DCA2; only 5% of gross subdividable area is proposed to be levied through the DCP. This is a consequence of 10% of LOS already being under City of Kalamunda ownership; and all LOS land within the 'Green Link' not being included as a DCP cost.</p>
8	<p>To Secretary, Western Australia Planning Commission</p> <p>Submission DCP I Amendment No. 113 City of Kalamunda Local Planning Scheme No. 3: High Wycombe South</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Development Conribution Area 2 and associated Development Contribution Plan Report</p> <p>As a resident In HWS (formally stage 2,3 industrial), for 20-years.</p> <p>I am appalled at the incompetence of people involved in this subdivision that has been in the pipeline for approximately 20-years starting in 2004 or 2000. The utter waste of taxpayers and ratepayer's monies to be only at this stage of development is disgraceful.</p> <p>The last 20-years and the city's recommendation for a DCP to be for the next 30-years, brings this project to a total of minimum 50 years.</p> <p>The proposed DCP is totally unviable to anyone who wants residential as it expects 59.4 hectares to pay \$41.8 million and rising. The city is continually blaming the so-called fragmented land-ownership on the t me frame and delays for the DCP. The city has and will not stand up and take responsibility for their own delays through their own incompetence.</p> <p>As a taxpaying ratepayer along with all the other landowners in HWS we are the only ones in the development that are losing out.</p> <p>We are currently and have previously been under house arrest because we have not been able to sell our property due to the city and their responses to potential buyers.</p> <p>The independent land valvar through the city has valued my land at \$140-145 per sqm, my independent land valuer has valued my land at \$250-270 per sqm, for the city expect me to accept their</p>	<p>The City commissioned an independent Feasibility Analysis in 2023 to test the viability of the contribution rate, which was further extended and updated in in 2024. Ultimately, the Feasibility Analysis concluded, using financial modelling, that the proposed contribution rate is viable to enable the development of DCA2 for residential uses.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>recommendations for this DCP is outrages, I am looking forward for this DCP, to be rejected, and the development area to be rezoned back to light industrial where the DCP would be a more realistic \$20 to \$30\per sqm.</p> <p>I urge you to consider this and the mental state of my fellow landowners as I do not want to find out that another Landowner has succumbed to suicide due to this drawn-out dilemma we are in, I think we have suffered long enough in this predicament.</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	
<p>9 (IN24/29F009 BD)</p>	<p>PRO-FORMA SUBMISSION #1 Executive Summary The DCP:</p> <ul style="list-style-type: none"> • Is economically unviable and highlights the failure of LPS3 to maximise land use in a strategically important location, alongside major infrastructure that is of high value to state development. • Is inequitable and places an unreasonable burden on existing landowners, both directly through the unviable contribution rate and operational lifespan, and indirectly through hidden costs. • Is a poor advertisement for urban infill, given the total erosion of current land-owners' rights, and the poor planning outcomes that will be achieved. • Lacks transparency because significant development costs have not been included. • Will lead to under delivery of both residential and industrial land supply by the CoK. 	<p>Refer to the City's below comments.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The DCP and LPS3 show the present residential objective to be flawed and unviable. Strong leadership is now required to avoid a serious planning misstep. The DCP highlights fatal flaws in the planned residential development of the HWS precinct (Precinct). On the other hand, the Precinct has previously been identified as being a key industrial area in a number of industrial land strategies. Proceeding with the DCP and LSP3 will squander the opportunity to optimise land use in the Precinct, to the detriment of both residential and industrial land supply and will fail to address the disastrous consequences being presently suffered by landowners in the area.</p> <p>The DCP brings 10-years of poor local planning decisions to the surface</p> <p>In 2014, the CoK was prevailed upon by the state government of the day to change its local planning strategy for the Precinct from industrial to residential. This ignored a raft of characteristics that make the Precinct highly suitable for industrial development (close proximity to key road, rail, air and industrial assets; and the natural buffer from residential areas provided by Poison Gulley and Roe Hwy) in favour of one driver - the construction of High Wycombe Station. In the 10-years following, much effort and resources have been directed towards advancing a flawed objective. These flaws are exposed in the DCP.</p> <p>The DCP and LPS3 miss golden opportunities to leverage the High Wycombe Station in ways that will bring employment density into the Precinct, and promote development based on proximity to Perth Airport, major freight and logistics infrastructure, and key industrial areas in neighbouring Kewdale and Hazelmere.</p>	<p>The land use zoning and suitability is beyond the scope of Amendment 113, which seeks to introduce a DCP.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Harmful to infill and initiatives to increase supply of affordable housing</p> <p>The Precinct will almost certainly become a poster child for poor outcomes from urban infill:</p> <ul style="list-style-type: none"> • Development contributions are factored into the purchase price paid by developers, and place downward pressure on land values. The high contribution rate (over 3x the contribution for HWS Stage 1 Industrial area), combined with 20-years of historical planning uncertainty that has already suppressed sales in this area, will further destroy value for landowners. The current replacement value of residential properties in the Precinct significantly exceeds the value based on subdivision potential. Consequently, if residents cannot sell their properties on the basis of current use, they will see significant destruction of property values. This will rob them of the ability to downsize or move to aged care, unless they're prepared to sell into a distressed (and arguably manipulated) market and will also be an impediment to aggregation necessary to enable residential development. • The high contribution rate; factors prohibiting a single or lead developer emerging; and lack of seed in the DCP; push out the development timeline and increase uncertainty. This is identified in reports prepared by CoK consultants, and tacitly acknowledged in the CoK's rationale for a 30-year operational lifespan for the DCP. The CoK's consultants have warned that there is little demand for the planned residential product and, combined with low median house prices in surrounding areas, the viability of residential development is questionable. This won't alleviate WA's existing housing shortage and will divert valuable resources away from residential priorities. in far more suitable areas. 	<p>No two DCPs are alike; consequently, accurate comparisons aren't possible. Rather than compare the proposed contribution rate to others with the Perth Metropolitan Region, the City has commissioned the 2023 and 2024 Feasibility Analysis', which have ultimately determined that the proposed contribution rate is viable to enable the development of DCA2.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>By way of comparison, land across Roe Hwy to the immediate east of the Precinct, is identified under the CoK LPS for urban growth and is currently being aggregated for planned residential development. This area can be directly linked to the High Wycombe Station by bringing forward plans for the Roe Hwy overpass.</p> <p>The DCP disregards recommendations and policy The DCP disregards advice and recommendations from CoK’s consultants and the WAPC; feedback from developers; and state planning policy:</p> <p><u>Consultants</u></p> <ul style="list-style-type: none"> • The CoK has received advice in a report from Macroplan (not included in the DCP Report). Based on a detailed sensitivity analysis that report concludes that residential development is not viable with a contribution rate and land value above \$60 sqm and \$130 sqm respectively. Notwithstanding, CoK seems determined to press ahead with a contribution rate of \$72 and valuations of \$140 - \$145 sqm. The contribution rate is subject to review and will continue to rise over time. • The unviable economics are exacerbated by other factors: <ul style="list-style-type: none"> ○ Construction costs have risen sharply, and continue to rise, albeit at a normalised rate ○ Costs required to mitigate against noise and disturbance because of proximity to road traffic, industry and the new runway at Perth Airport don't form part of the DCP but are additional 'hidden' cost that will impact the viability of the Precinct's development. 	<p>The 2023 Macroplan Report has been appended to both 2023 Council Reports.</p> <p>The 2024 DCP has been updated with cost escalation figures, recommended by an independent quantity surveyor. Concurrently, land rates have also increased.</p> <p>OP2.4 establishes a framework for a state-wide development levy, used to develop new (public) schools throughout the state. This</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<ul style="list-style-type: none"> ○ Additional contributions will be required from developers to help fund the planned primary school, under a separate process undertaken by the Education Department. ○ On the sell side, the prices achievable by developers for the finished medium and high density product will be negatively impacted by low median house prices in surrounding areas, and noise warnings that will be required on titles in some parts of the Precinct. <ul style="list-style-type: none"> ● Analysis of the DCP and population yields by CoK's consultants highlight fundamental issues with the DCP and LPS3: density targets are overly optimistic, and CoK's consultants have concluded that the "market depth for medium and high density in the area is assessed as low" (URBIS March 2023 p9). <p><u>WAPC</u></p> <ul style="list-style-type: none"> ● The WAPC, while still failing to fully address the policy inconsistency on the DCP lifespan, recommended that the CoK: "Replace all references to the DCP operational lifespan as 'Thirty Years' with 'Twenty Years' and update priority and timing of infrastructure accordingly, across the amendment document and Development Contribution Plan Report." The CoK did not support this change and based their justification on issues and uncertainties that only serve to underscore why the Precinct is unsuitable for residential development. <p><u>State Planning Policy</u></p> <ul style="list-style-type: none"> ● State Planning Policy 3.6 (Infrastructure Contributions) sets out the requirements for establishing development 	<p>development levy is not included in the DCP and is an additional development cost when exploring feasibility of development in DCA2. In the case of DCA2, this represents \$9 million for DCA2 or +\$15.19/m² (informed by the 2023 land valuation of \$140/m²). The financial model developed to inform the 2023 Sensitivity Analysis did consider the implications of OP2.4. The implications of OP2.4 on development feasibility in DCA2 was further explored through the 2024 Sensitivity Analysis. The analysis' concluded that the current DCP remains viable with the additional development levy for school sites.</p> <p>The City has reconsidered the proposed lifespan of 30-years, concluding the protracted lifespan is imperative to ensure an equitable and feasible DCP. A lifespan any less than this would be insufficient to collect funds for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>contributions required to support the orderly development of an area. It also provides a consistent, accountable and transparent system for local governments to plan and charge for development contributions. SPP3.6 states that ‘the lifespan of a DCP should be linked to completion of development or subdivision, and generally a maximum lifespan of 10-years’.</p> <ul style="list-style-type: none"> • The problems and uncertainties cited by CoK are not acceptable justification for departure from the general policy of a 10-year maximum lifespan in SPP3.6. • The DCP lacks transparency, in that reliance is placed on the assumption that the WAPC will pay for a significant proportion of LOS/POS and not all infrastructure has been included upfront (eg. only 15% of road design and cost is included with 85% deferred pending more certainty through the statutory approval process – p16 DCP Report). • Contrary to SPP3.6, this DCP serves as the vehicle for entirely disorderly development. • More generally, LPS3 diverges from policy goals contained in the following SPPs: State Planning Policy 4.1 – State Industrial Buffer Policy; State Planning Policy 5.4 - Road and Rail Noise; and State Planning Policy 5.1 – Land Use Planning in the Vicinity of Perth Airport. This highlights broader issues confronting residential development in the Precinct. (Further details of these policy conflicts are available on request.) <p>Inequitable Structure</p> <ul style="list-style-type: none"> • The DCP places a disproportionate and unfair burden on current landowners. Developers will deduct the DCP contribution rate from the price they are prepared to pay landowners - that is approximately \$720,000 for a 1Ha block. Other factors identified by consultants (see above), seriously 	<p>The data suggest that 25% of DCA2 will be developed, and consequently make a development contribution within the first ten years. . A 10-year lifespan would therefore be insufficient to collect funds necessary for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6.</p> <p>This statement is incorrect. The DCP embeds a concept level design (15%) which have bene used to inform the BOQ's and cost estimates. The cost estimates informing the DCP, provide for full construction costs, unless otherwise apportioned (refer to apportionment section of DCPR). In 2024/25 the City has identified budget to further progress the infrastructure designs and investigations for all infrastructure in the DCP. Detailed Designs will further refine the quantities informing the DCP, thereby providing further confidence regarding the cost estimates and acquisition areas (land costs). The quantum of work and costs to prepare detailed designs (85%) is significant and it would not have been appropriate use of resources to prepare a draft DCPR with that level of design, however as greater certainty is provided regarding the inclusion of infrastructure in the DCP, it is appropriate to undertake further detailed design at this juncture to inform early reviews of the DCPR.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>impact the economic viability of the development, and will compound the destruction in value of existing residential land in the Precinct.</p> <ul style="list-style-type: none"> • There are approximately 90 landowners in the Precinct, which covers a total area of 121.7 Ha. The developable/net contribution area (NCA) is said to be 59.4 Ha, approximately 50% of the total area, with 62.3Ha excluded from contribution (conservation, LOS/POS, primary school, roads etc). The reservation of public open space far exceeds WAPC's 10% policy, and significantly increases the high percentage of non-contributing land. In turn, the high percentage of non-contributing land increases the contribution rate for the developable area. • The DCP includes a presumption that the WAPC will purchase around 7.4 Ha of LOS. If this does not eventuate, a further \$10 m (approx) will be unfunded. • The contribution rate is inflated by the provision of amenities that will benefit many people from outside the Precinct and the cost of development of the unusually large area of LOS/POS. <p>The elephant in the DCP On many levels, the DCP and LPS3 do not optimise land use in the Precinct.</p> <ul style="list-style-type: none"> • The Precinct is highly desirable industrial land. The existing HWS Industrial Area is identified as 'Stage 1' because the TOD Precinct and the Precinct were identified as key industrial areas, to be developed as Stages 2 and 3 respectively. This followed extensive analysis and consultation over nearly a decade. At that time, the CoK's plan was for Stage 3 to provide for "Economic/Employment Opportunities as a key industrial area". This was, and still is, consistent with the "CoK Industrial Development Strategy" 	<p>While the DCP proposes to coordinate a total of 15% of LOS throughout DCA2; only 5% of gross subdividable area is proposed to be levied through the DCP. This is a consequence of 10% of LOS already being under City of Kalamunda ownership; and all LOS land within the 'Green Link' not being included as a DCP cost. Developers are therefore only being levied half of what the planning framework enables the City to levy.</p> <p>Where non-local infrastructure is proposed through the DCP, it has been apportioned appropriately to ensure an equitable contribution to infrastructure upgrades. All other (non apportioned infrastructure) is local (i.e. district open space is excluded).</p> <p>The land use zoning and suitability is beyond the scope of Amendment 113, which seeks to introduce a DCP.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>and broader planning policies including “Directions 2031 and Beyond”.</p> <ul style="list-style-type: none"> • At this moment, industrial land in neighbouring Kewdale and Hazelmere is in high demand, with limited further supply, particularly in relation to larger lots, that are available in the Precinct. This contrasts sharply with the speculative projections of “possible” long term demand for high and medium residential density by CoK consultants. If not already, the shortage of industrial land supply is approaching the point where state development will be impacted. • Multiple land strategy reports commissioned by the WA Govt note the high importance of preserving key industrial sites in order to promote employment and state development. This is reflected in the 2018 CoK Industrial Development Strategy Report, which highlights the need to protect key land parcels from subdivision to facilitate the need for larger lots. State industrial land strategies also recognise the importance of preventing residential encroachment on industrial areas. • There are areas nearby with greater amenity and few restrictions on residential development. There is opportunity for CoK and WAPC to sell holdings acquired within the Precinct, and use proceeds on infrastructure to support residential development in more amenable areas, for example east of Roe Hwy, where bringing forward construction of the Roe Hwy overpass would bring near term benefit in maximising use of the High Wycombe Station and providing a catchment area for employment in industrial areas west of Roe Hwy. This would add much needed supply to both residential and industrial land supplies in a far shorter timeframe than contemplated in 	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>the DCP, maximise use of existing infrastructure and avoid conflict between the two land uses.</p> <ul style="list-style-type: none"> • As the CoK is aware, the residents on the north side of Sultana Road West have registered continuous and ongoing complaints regarding noise, vibrations and fumes emanating from the HWS Industrial Area Stage 1. These complaints will only multiply with the addition of residential density, thus threatening industrial activity in this area. • Revised planning of the Precinct (and the TOD Precinct) can be used to attract employment density and investment into the CoK. Developments within Perth Airport itself provide a cue, with successful developments of retail outlets, industrial development with office facilities, and a planned hotel development. In Australia and overseas, there are many examples of land surrounding international airports being successfully used for such airport related developments. Airport linked development would complement access to Optus Stadium via High Wycombe Station, and the Precinct's proximity to the Swan and Avon valleys. <p>Conclusion The Precinct has been subjected to planning uncertainty and missteps since 2004. It has many natural advantages and could be used to advance both the state's residential and industrial land strategies simultaneously. The CoK's December 2018 Industrial Development Strategy Report highlights the difficulties in meeting the CoK's industrial land quotas following the change in planning objectives for High Wycombe South Industrial Stages 2 and 3. If the current course for the Precinct is not corrected, the DCP/LPS3 will negatively impact state development and destroy (more) lives of landowners within the Precinct. Overwhelming logic dictates that the Precinct should be developed for industrial and airport related</p>	<p>The zoning and ongoing compliance issues are beyond the scope of Amendment 113. Nonetheless, the City's Compliance Team continues to monitor land use in the area to ensure compliance with LPS3 and existing approvals. Landowners are encouraged to contact the City's Compliance Team to discuss this matter.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>purposes. This is capable of being achieved under a DCP that is economically viable and consistent with the principles underlying development contributions in WA.</p> <p>The advantages of a pivot in strategy:</p> <ul style="list-style-type: none"> • CoK and WAPC can sell holdings acquired within the Precinct at considerable profit and use proceeds to fund residential development and infrastructure in more suitable areas, such as Maida Vale South and Forrestfield North. • Bring much needed housing and industrial land supply to market with high levels of certainty, and in far shorter timeframes than contemplated by the DCP. • Reduce the risk of conflicting land use with High Wycombe South Industrial Area Stage 1 and Perth Airport. • Bring employment density/opportunities and investment into the CoK. • Maximise the use of state's existing investment in major road, rail and air infrastructure. • Avoid what would be a very poor and very public urban infill outcome. <p>The disadvantages of persisting with a DCP and planning strategy that independent analysis shows to be fundamentally flawed:</p> <ul style="list-style-type: none"> • Uncertainty and serious delay while nearby infrastructure, including High Wycombe Station, is under-utilised and depreciating. • Disorderly development. • Very poor outcomes for existing landowners and a ready-made advertisement for anyone opposing infill. • Bringing residential development into conflict with industrial land use. 	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<ul style="list-style-type: none"> Undermining WA's industrial land strategy and need to the detriment of employment opportunities and state development. 	
10 (IN24/29ED8 B67)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	Noted.
11 (IN24/29ED1 7E3)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	Noted.
12 (IN24/29F294 F9)	<p>We have resided in the High Wycombe South area since 2004. Soon after we moved in, we received notice that the Land Zoning was changing to Light Industrial. Since that day 20-years ago, along with the other landowners of the area, we have been in a constant battle to preserve fair and reasonable value and equity of our family home. This has taken a huge toll on the community including Mental Health Issues and family breakdowns. After 10-years of achieving seemingly little, a decision was made (with limited community consultation) to change the zoning to Urban. After another 10-years of planning, the investment in our family home has been going backwards whilst the rest of the Perth Realestate market is booming at unprecedented levels. We have come to the realisation that our property has been Land Banked for the past 20-years by this planning process, and bureaucracy has taken priority over our basic rights as a Homeowner. Now we are presented with a plan (which has been 20-years in the making) that is going to take another 30-years to realise, which by all accounts, does not comply with statutory guidelines. The planning process that has taken 20-years to complete, is not only flawed, but also unconscionable, reckless, and discriminatory to the land-owners' rights. The DCP value is unprecedented and certainly places a disproportionate and unfair burden on the Landowners, as the DCP value will be novated</p>	The historical zoning context of DCA2 is beyond the scope of Amendment 113.

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>directly to the landowners by the developers. This will certainly add to the unviability of the project, as land-owners' will not be able to replace their family homes with a like for like lifestyle.</p> <p>In summary, the area has been subject to planning uncertainty since 2004, with serious adverse consequences for landowners' physical, mental and financial well being. This will not change while planning authorities continue to ignore/manipulate the facts in pursuit of a flawed residential development outcome for the area in preference to development for light industrial use. It is our strong view that amending LPS3 to allow for light industrial development, as was the original plan prior to 2014, will avoid massive destruction of property values in this precinct. It is also our view that the landowners are entitled to compensation for destruction to the land values in this district.</p> <p>Please accept this Submission and attached detailed justification as to why the state government should not approve this re-development.</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	
<p>13 (IN24/290FCF 7E)</p>	<p>PROFORMA SUBMISSION #2 High Wycombe South DCP</p> <p>A DCP should not be used as the means to fund the development of High Wycombe South. The City and its consultants repeatedly state that the development will take at least 30-years to complete. That 30-year time-frame will violate many of the "principles" required for the conduct of a DCP, including Need and Nexus,</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Equity and Certainty. None of these are achievable over such a long period.</p> <p>If 5 yearly reviews of infrastructure are conducted as required by SPP 3.6, there would be at least 5 major reviews which may well radically change the whole DCP infrastructure requirements.</p> <p>At the end of this 30-year period, it will be impossible to conclude the DCP according to the policy.</p> <p>SPP 3.6 states: The application of mechanisms outlined in this policy, such as Development Contribution Plans (DCPs), may not be suitable for all development settings, where the rate of development may result in difficulties to realise the intended infrastructure within the life of the DCP, and principles such as certainty, and need and nexus are difficult to establish. Infill development and regional areas experiencing slow growth rates are examples where the use of such mechanisms need to be considered with a degree of caution. Alternative approaches and mechanisms for funding may need to be considered to ensure the timely and coordinated redevelopment of an area, especially where the early of delivery of infrastructure is essential.</p> <p>High Wycombe South is clearly unsuitable for a DCP because of the fragmented ownership and the clearly acknowledged 30 plus year development time.</p> <p>It should also be noted that a traditionally run DCP will not have any funding for initial infrastructure until after land development has begun (cart before the horse).</p> <p>In 2021 SPP 3.6 was rewritten after 12 years of experience using the original policy. The language used in the updated policy</p>	<p>Alternative funding mechanisms were explored by the City in late 2022, with the findings summarised in the Sensitivity Analysis. Ultimately, it was determined that a DCP provides the most equitable an outcome.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>regarding a 10 maximum life span, was strengthened based on that previous experience for a very good reason. SPP 3.6 states:</p> <p>Lifespan should be linked to completion of development or subdivision, and a maximum lifespan of 10-years applies. A lifespan longer than 10-years will only be considered in limited circumstances, if justification for such a timeframe can be demonstrated and linked to a capital works and staging program, and subject to the principle of equity being upheld. A longer lifespan of up to 15 years may be considered in limited circumstances...</p> <p>Clearly “equity” cannot be demonstrated over longer time-frames due to changes to the multiple factors that will change significantly over 30-years, for example, housing type and density.</p> <p>For any DCP to operate as it should and not become a financial disaster for all concerned, it must conform to the legislated state policy otherwise there is no point having the policy. Clearly this particular DCP, over an extended time-frame and fragmented land-ownership, does not conform to SPP 3.6 and alternative funding methods should be sought.</p>	<p>A DCPs lifespan commences following the gazettal of the Ministers approval of the scheme amendment to introduce the DCP, and concludes when all development throughout the DCA2 has occurred, and a development contribution has been collected for the entire DCA2, or where the costs of administering the DCP outweighs the outstanding contributions, whichever occurs first.</p> <p>The City only has the statutory power to levy development contributions once the DCP has been approved by the Minister and at the time of development; that is when the land is subdivided and/or the site is improved for urban purposes. Consequently, the collection of DCP funds is contingent upon the rate of development within DCA2, and should the nominated lifetime be inadequate to ensure all contributions are collected, it would result in a shortfall of funds required for the delivery of infrastructure.</p> <p>Whilst the planning framework (SPP 3.6) suggests a maximum lifespan of 10-years, it also acknowledges the lifespan should be linked to completion of development or subdivision to ensure infrastructure costs are shared equitably amongst all beneficiaries.</p> <p>The City has reconsidered the proposed lifespan of 30-years, concluding the protracted lifespan is imperative to ensure an equitable and feasible DCP. A lifespan any less than this would be insufficient to collect funds for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6.</p> <p>It is important to understand that the nominated lifespan of the DCP does not impact upon the priority and timing of infrastructure delivery. Infrastructure is delivered through the DCP as funds</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
		become available, through levied development contributions, or at times sooner through alternative funding mechanisms (i.e. loaning from municipal funds, advocacy funding etc.). While alternative pre-funding mechanisms can positively influence the priority and timing of infrastructure delivery, the levying of development contributions rate is contingent upon the rate of development in DCA2. It is important for the DCPs lifespan to be sufficient to ensure development contributions are received from all future urban development in DCA2, upholding equity in the application of the DCP.
14 (IN24/290F3144)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	Noted.
15	From the Amendment No. 113 to City of Kalamunda Local Planning Scheme No. 3 - it shows that end portion of [REDACTED] Smokebush Place High Wycombe has been earmarked as Local Open Space (949.01m ²). My father in law is a registered owner of the land is not please with further land acquisition for open space when there's already substantial amount of land within the vicinity dedicated for open space purposes. And he doesn't understand why there's such a need and if it is so - he's asking if there's such adequate monetary compensation will be given back to him as the landowner as they have done to his [REDACTED] previously. For your information he is scheduled back in Perth on 3 May 2024 and will come to Kalamunda City Council office to discuss further on this matter.	The zoning of DCA2 is beyond the scope of Amendment 113. LOS locations have already been determined through the LSP. The DCP will however, enable the acquisition of land identified for LOS. Please refer to the Land Acquisition section of the DCPR for further information.
16 (IN24/29119B9F)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	Noted.

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
17 (IN24/2913F D62)	<p>To Whom it may concern,</p> <p>I wish to make my Submission to the City of Kalamunda (CoK) regarding the draft LSP3/DCP;</p> <p>The Draft LSP3/DCP for the purpose of Residential development is flawed, it has been flawed since 2014 and continues to be flawed going forward.</p> <p>The over the top DCP \$ amount, the inability of CoK, Development WA and the State Government- Liberal and Labour to progressively manage this area to compliment the \$2B+ High Wycombe Train Station has been nothing short of incompetence. You only have to look at the empty and deserted TOD area, not to mention all the empty seats on the buses and trains.</p> <p>To highlight more incompetence within the Government departments mentioned;</p> <p>Stage 1 Light Industrial area has General Industry developments approved across the road to the proposed Residential Zone without separation;</p> <p>The proposed future 3rd runway to Perth Airport which is very close to the Residential Zone may result in flight curfews in the future as implemented in other states of Australia;</p> <p>The proposed future expansion of the Forrestfield Freight Marshalling yards, due to the new Cockburn Port development will add to the negative amenity of a Residential Development.</p> <p>All these 3 points alone, and not restricted to, suggest and paint a definitive picture that Residential Development is FLAWED in this area.</p>	The zoning of DCA2 is beyond the scope of Amendment 113.

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>In 2014 when the Government of the day decided to bring the airport link to High Wycombe, without land-owners' consultation, the residents and land-owners of this development area were told that works will be done, infrastructure would be put in to attract developers and that our land would be worth more than the former planned Industrial re-zoning.</p> <p>The past and current State Governments and there departments have shown no importance and a total lack of care or respect to this Development area, and to the people who live or own land there, to make the transition for Residential development as smooth as possible. There has been no investment of infrastructure to attract developer investment to this area. There is no incentive to any Land Owner in this area to sell their land for Residential development other than they are to old, have health issues, are in deep financial pain or are dead and is part of their estate.</p> <p>Land-owners in this Development area have been made to hold the can, to be subjected to a State Government land bank with no resolution in sight going forward.</p> <p>When I bought my land in 2008 to future proof my business expansion, my bank had an independent valuation done for my loan application based on the land being re-zoned to Industrial as it had been progressing since 2004 and advised by the CoK. To this day I still have a 7 figure loan repayment on my property, which I can't do what I bought it for and I can't sell without giving it away and losing money I don't have.</p> <p>I see only 2 ways to make this Development Area positive and profitable for all involved;</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Make it a \$0 DCP and the State Government pay for the implementation of all infrastructure outlined, or Reinstate the Light Industrial zoning as started in 2004. Anything less than this, all the Government departments associated, would have wasted 20-years and will continue to waste the next 20+ years of Land-owners time. Time that not a lot have and we would hope that the Government departments are not banking on that.</p> <p>I have also attached another LSP3/DCP submission that was prepared by another land-owner which we land-owners', [REDACTED], fully support.</p> <p>We the Land-owners would hope that common sense will prevail and Land-owners can finally move on with their lives.</p> <p>'Pro-forma submission #1 (refer verbatim submission 9) attached to submission.</p>	
18 (IN24/291369 FF)	'Pro-forma submission #1 (refer verbatim submission 9) attached to submission.	Noted.
19 (IN24/2917C A12)	'Pro-forma submission #1 (refer verbatim submission 9) attached to submission.	Noted.
20 (IN24/2E6F6F 0E)	<p>WE AGREE WITH MULTIPLE LAND-OWNERS' THAT WE NEED OUR ZONING TO BE CHANGED TO LIGHT INDUSTRIAL, BACK TO WHAT IT ORIGINALLY WAS BEFORE IT WAS CHANGED WITHOUT REALISING!</p> <p>TOTALLY UNACCEPTABLE MESS REALLY, OUR AREA IS ON HOLD THIS NEEDS TO BE SORTED ASAP PLEASE!</p>	The zoning of DCA2 is beyond the scope of Amendment 113.

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>THE BEST WAY FORWARD WOULD BE LIGHT INDUSTRIAL.</p> <p>THANKS</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	
<p>21 (IN24/291D7 F29)</p>	<p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	<p>Noted.</p>
<p>22 (IN24/291EC BD4)</p>	<p>I disagree totally with this document.</p> <p>I live right opposite a structural steel company and would say I am one of the worst affected residents in this entire area living meters from a so-called Light Industry Zone in Stage 1 without any protection from noise, vibrations, and emissions which I endure daily.</p> <p>Minister John Day approved Stage 1 on the condition that there would be no noise coming from businesses. In addition, when seeking approval for Stage 1 as an industrial area, the City of Kalamunda relied on the fact that our land was also going to be industrial, therefore eliminating any disruption to residential areas. The previous Director of Development Services at the City assured us that there would not be disturbances before 7am and after 5pm five days a week. The reality of living across from Stage 1 is very different, for example:</p> <p>There is constant noise from trucks entering Golden Egg Farms at all hours of the morning and into the evenings, and noise from parked refrigerated trucks day and night.</p>	<p>The zoning and compliance matters are beyond the scope of Amendment 113. Nonetheless, the City's Compliance Team continues to monitor land use in the area to ensure compliance with LPS3 and existing approvals. Landowners are encouraged to contact the City's Compliance Team to discuss this matter.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<ul style="list-style-type: none"> How can a structural steel company be considered light industry? Paint fumes blow onto my property from their paint shop whenever there is a southwest wind blowing. Oversize trucks loaded with steel reverse into their premises without a spotter daily. The road is not wide enough for some of them to turn so they venture onto verges opposite. My brick fence was once hit by one of these trucks, so the owner has erected bollards on my front verge which constantly get knocked over. Why does the city insist on going ahead with residential development within such proximity to a structural steel company? <p>When is the city going to step up and admit the fact that Stage 1 is not Light Industry? It's time for the city to start doing their own monitoring. State Planning Policy requires separation between industry and residential, especially for health reasons. I am suffering from a failure to enforce this policy. Please explain why the city is not adhering to this policy.</p> <p>Having a 30-year DCP is beyond belief. Did the planning minister give his authority for such a document? State Planning Policy says that DCP timeframes should not exceed 10-years. A 30-year DCP means that the pain and suffering of existing residents and landowners will be prolonged indefinitely. Does the state government support this? It seems to us that the justifications given by the CoK in support of a 30-year DCP only highlight the fact that this whole precinct is unsuitable for residential development. Why are you persisting with this plan, when the factors that make the precinct unsuitable for residential, would also make the area highly sought after industrial land?</p>	<p>A DCPs lifespan commences following the gazettal of the Ministers approval of the scheme amendment to introduce the DCP and concludes when all development throughout the DCA2 has occurred, and a development contribution has been collected for the entire DCA2, or where the costs of administering the DCP outweighs the outstanding contributions, whichever occurs first.</p> <p>The City only has the statutory power to levy development contributions once the DCP has been approved by the Minister and at the time of development; that is when the land is subdivided and/or the site is improved for urban purposes. Consequently, the</p>

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	<p>The macroplan analysis of the proposed DCP points out the problems with the number of contributions sought and the length of the plan. They suggest that residential development is unviable and query whether planned use of the land should go back to industrial use. The city engaged macroplan for this analysis. Why doesn't the city accept the views of its own consultant. Failure to do so is causing serious economic loss to existing landowners.</p> <p>Does the city still intend to add a notification to the titles of the first row of lots in Sultana Road West warning of the potential for higher-than-normal noise levels from light industry across the road? This will destroy the value of our homes. Why should I be penalised when this has been caused by the city's negligent planning decisions?</p> <p>The proposed DCP must be rejected. My neighbours and I cannot go on living this way, and if it is approved this DCP will seal our fate. Someone must take responsibility because as I see it no one seems to care about the welfare of residents.</p>	<p>collection of DCP funds is contingent upon the rate of development within DCA2, and should the nominated lifetime be inadequate to ensure all contributions are collected, it would result in a shortfall of funds required for the delivery of infrastructure.</p> <p>Whilst the planning framework (SPP 3.6) suggests a maximum lifespan of 10-years, it also acknowledges the lifespan should be linked to completion of development or subdivision to ensure infrastructure costs are shared equitably amongst all beneficiaries.</p> <p>The City has reconsidered the proposed lifespan of 30-years, concluding the protracted lifespan is imperative to ensure an equitable and feasible DCP. A lifespan any less than this would be insufficient to collect funds for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6.</p> <p>It is important to understand that the nominated lifespan of the DCP does not impact upon the priority and timing of infrastructure delivery. Infrastructure is delivered through the DCP as funds become available, through levied development contributions, or at times sooner through alternative funding mechanisms (i.e. loaning from municipal funds, advocacy funding etc.). While alternative pre-funding mechanisms can positively influence the priority and timing of infrastructure delivery, the levying of development contributions rate is contingent upon the rate of development in DCA2. It is important for the DCPs lifespan to be sufficient to ensure development contributions are received from all future urban development in DCA2, upholding equity in the application of the DCP</p>

SUBMISSION NO.	SUBMISSION	CITY RESPONSE
		<p>Regarding notifications, within Volume 1, Table 3 - Conditions of Subdivision and Development of the Local Structure Plan include an item for 'Other Noise Sources':</p> <p><i>"5.2 An acoustic assessment and management plan are to be undertaken and implemented to the satisfaction of the local government at the subdivision and/or development stage to investigate and respond to noise impacts for lots in proximity to Sultana Road West."</i></p> <p>An acoustic assessment and management plan will inform the ultimate requirement for notifications at the subdivision phase.</p>
23 (IN24/321262 43)	<p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p> <p>'Pro-forma submission #2 (Refer verbatim submission 13) attached to submission.</p>	Noted.
24 (IN24/292457 BC)	<p>A SUBMISSION FOR THE DCP FOR HIGH WYCOMBE SOUTH SUPPORTED BY A GROUP OF THE LANDOWNERS</p> <p>This draft DCP is a serious threat to people in this community.</p> <p>This document will also be sent to the Premier, the Minister for Planning and the Chairman, WAPC.</p> <p>The answers for each point are published in Council Minutes before they are submitted to the WAPC to review.</p> <p>We ask Council in this instance, to call a public meeting with landowners before shutting us out and sending its review to the WAPC. The WAPC and DPLH could attend the meeting.</p>	Noted.

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>We wish to avoid repeats of previous circumstances where a final draft of a planning document was submitted to the WAPC with no input on the final draft.</p> <p>Those drafts proved to be flawed and have caused the serious problems we have today. The Stage 1 interface is just one example in LSPs dated 2020 and 2023.</p> <p>The replies from the City to each of the points made in the submission are to be factual and to the point, and not merely the use of the word "Noted", which can lead to an issue being ignored and implemented against people's wishes or no explanation.</p> <p>Something for the City to learn from the past.</p> <p>INDEX</p> <ul style="list-style-type: none"> • Key Points • Humanitarian Rights Is The Highest Ranking Element In The Duty Of Care. • Why We Are In This Situation • DCP Is Wasting More of Our Precious Time In the Twilight Years • Proof of Authority to Publish the DCP – DCP is Invalid. • Delete the 50% cost in the DCP to upgrade Sultana Road West to RAV 4 • DCP Rate Calculation \$10.29 million for Green Link Approximate \$510,000 so-called "administrative" error The Nett Contribution Area (NCA) of 594,129m2 is not achievable. Item 21.1 in the LSP - Interface Treatments • Take The Opportunity To Rezone Our Properties Light Industry Land Use <p>Key Points – A comment is required to each bullet point</p>	<p>The City actively continues its Advocacy Campaign for alternative funding for the HWS Residential Precinct, with the intent of</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<ul style="list-style-type: none"> The humanitarian outcome is the greatest challenge here for Councillors, the City and the State Government. <p>People's welfare is the highest priority. The population profile is heavily skewed towards the elderly. 88% are 60 years or more. Usually it is 20%.</p> <p>Drafting the DCP is a secondary task. It cannot be finalised without resolving the humanitarian issues. This means consulting with the community.</p> <p>The DCP is hostage to the true issue – the welfare of people in High Wycombe South Precinct.</p> <p>Governments and Council have been found wanting and fallen well short with no duty of care shown to us. We have already endured twenty (20) years of waiting.</p> <p>Correspondence about the issue of the welfare of the elderly community was sent to the Premier, Minister and the CEO City of Kalamunda amongst others, as early as 2018.</p> <ul style="list-style-type: none"> How will the final draft of the DCP remedy our situation. We are looking for an appropriate duty of care, and fairness in dealings with our properties. The draft Residential DCP is not economically viable. The City knows this and says so in the DCP. <p>A DCP of \$70 - \$100/m2 removes the incentive for landowners to sell. We were duped into staying here in the critical 2004 – 2014 period. We were then misled by phony statements about Residential zoning soon after 2014.</p>	<p>reducing costs to the DCP. The DCP provides a clear and accountable instrument for the City to seek external grand funding from third parties (e.g. State Government) to support the delivery of all infrastructure identified in the DCP. In particular, there is strong justification to advocate for State and Federal funding to facilitate affordable and diverse housing in the HWS Residential Precinct, leveraging off significant infrastructure investment (e.g. Gateway WA and the Metronet Airport Link Railway).</p> <p>The City commissioned an independent Feasibility Analysis in 2023 to test the viability of the contribution rate, which was further extended and updated in 2024. Ultimately, the Feasibility Analysis concluded, using financial modelling, that the proposed contribution rate (\$76.52/m²) is viable to enable the development of the HWS Residential Precinct, however, is highly sensitive to development cost shock or higher land values.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Landowners are so badly affected by the resultant low price for their property that they cannot afford to sell.</p> <p>The land will never become available for the development of the housing plan set out in the Amended LSP for High Wycombe South.</p> <ul style="list-style-type: none"> When did the City first raise the issue of the elderly community in High Wycombe South with Government with respect to the 30-year DCP. What was their response? ACTION : Please provide a copy of documentation about addressing the human welfare issues, or else make it available for inspection. Why did the WAPC let the City waste the last 18 months of our time working on a 30-year DCP that can never be implemented unless most of the properties are purchased now? The community is fatigued and stressed out. Our welfare should have been prioritised in the draft DCP. <p>The draft DCP fails its primary test. Consult with us during this process. Have meetings with us.</p> <p>We need our Councillors to have the commitment to not submit the final draft to the WAPC without getting agreement from the community on how the elderly are accommodated.</p> <ul style="list-style-type: none"> 30-years lifespan for a Residential DCP is 200% outside the 10-year authority limits of the WAPC, DPLH, SPC or the City of Kalamunda. 200% over the limit says this DSP is far-fetched, risky and unprecedented. There is no indication the Minister gave his authority to advertise a 30-year DCP. 	<p>The demographic information for High Wycombe South is available to the Government at all times.</p> <p>The City has undertaken public consultation above the requirements of the Planning Framework.</p> <p>The forecast development rates suggest that 25% of the HWS Residential Precinct will be developed, and consequently make a development contribution within the first 10-years. A 10-year lifespan would therefore be insufficient to collect funds necessary for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6. Refer to the</p>

SUBMISSION NO.	SUBMISSION	CITY RESPONSE
	<p>If he did not, then it was unlawful to advertise the intent to implement a 30-year DCP for High Wycombe South. Discard the 30-year concept now and please stop dragging out the process.</p> <ul style="list-style-type: none"> • Quote from the City's website. "Should the Minister for Planning decide that the amendment requires further modifications further advertising of the amendment may be required. In this event, finalisation of Amendment 113 and the DCP could be delayed pending further changes. • Why didn't the City's Planning Department ask the WAPC / Minister in December 2022, what would be acceptable? <p>A year and half later, and the City still does not know what the Minister will accept. It is just fishing</p> <p>One thing the Minister won't accept is 30+ years DCP. The Government now has two (2) choices:</p> <ol style="list-style-type: none"> 1. Rezone the subject land to light industry, or. 2. Negotiate and purchase properties en masse now and gain direct control over the project. <ul style="list-style-type: none"> • Cabinet would have to approve a 30-year DCP given how serious are the human consequences. <p>The City's plan for a 30-year DCP proposes that all or most of us die here.</p> <p>Cabinet will be asked to rule on that.</p> <p>A Minister would be unlikely to have authority to do this, nor wish to have authority to do this.</p>	<p>'Operational Period (30-years)' section of the Council report for detailed justification for the proposed 30-year lifespan.</p> <p>The nominated lifespan of the DCP does not impact upon the priority and timing of infrastructure delivery. Infrastructure is delivered through the DCP as funds become available, through levied development contributions, or at times sooner through alternative funding mechanisms (i.e. loaning from municipal funds, advocacy funding etc.). While alternative pre-funding mechanisms can positively influence the priority and timing of infrastructure delivery, the levying of development contributions rate is contingent upon the rate of development in the HWS Residential Precinct. It is important for the DCPs lifespan to be sufficient to ensure</p>

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	<p>The Minister would be personally accepting the legal liabilities for individual incidents in High Wycombe South if he did approve it. One could not imagine a Minister doing that.</p> <ul style="list-style-type: none"> • The City's website says "...a Development Contribution Plan (DCP) is required to coordinate the equitable cost sharing arrangements". How will equitable cost sharing happen over 30-years. Show us the financial modelling you use. • The annual DCP review process, and the deferrals built into the LSP, brings the inevitability of higher costs for those landowners whose properties do not sell early. \$100+/m2 in today's dollars is a high probability. <p>Many will be in our late 80s or early 90s by then. A despicable scenario by reasonable standards of duty of care.</p> <p>Words like Government pre-funding of early development gives a hint of pushing higher costs to the landowners at the back end of residential development.</p> <p>The people making these promises now, like the Director Development Services or the WAPC Chairman, will be long gone.</p> <p>This concept of pre-funding runs counter to the equitable cost sharing arrangements promised on the City's website?</p>	<p>development contributions are received from all future urban development in the HWS Residential Precinct, upholding equity in the application of the DCP.</p> <p>To uphold a transparent process, all data and methodologies used to inform the DCP are outlined in the DCPR (Attachment 2) and its appendices. This information has been available since Councils initiation in April 2023.</p> <p>Development contributions are levied at the time of development (subdivision or development approval), or earlier should a landowner volunteer. The methodology of the DCPs ensures all costs are equitably shared amongst all beneficiaries throughout the lifetime of the DCP. Annual reviews enable the costs to be updated, relative to concurrent changes to land and development costs. Consequently, early Government pre-funding would only act to reduce the liabilities for landowners at the time of development.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>One can already see how the plan is difficult to put together. It just doesn't work.</p> <ul style="list-style-type: none"> • The City's statements on the website about this DCP, lack credibility. It reads like this is DCP Version # 1 and wait around while other Versions follow. Please excuse the bluntness, but incompetent planning and scoping the issues at the start of the DCP project, is where the problem lies. • The DCP ignores General Industry in Stage 1 and assumes there will be no transition distance. Instead, Element WA designates 2-storey high housing to be built up to the front fence line along the central part of Sultana Road West (SRW). <p>Would you buy a 2nd storey unit to look at Stage 1. Element WA have been asked to explain how their assessment eliminated the 200-metre buffer to protect residential housing across the road.</p> <p>The District Structure Plan 2016 prepared by TPG Consultants had a 200- metre buffer. Element WA to explain how they convinced the City and WAPC in 2020 and again in 2023 to reduce 200 metres buffer to zero. A reply is outstanding from Element WA.</p> <ul style="list-style-type: none"> • A residential DCP should only proceed with the following actions: <ul style="list-style-type: none"> a) The Government and Council to jointly negotiate to buy at least 90% of the properties at market values of more than \$225/m2 irrespective of the DCP lifespan, now. This gets the elderly community out of the trap set up by Government and the City. No further delay is warranted. 	<p>The zoning of DCA2 is beyond the scope of Amendment 113.</p> <p>All land contained within DCA2 can be developed today. The DCP's proposed lifespan of 30-years does not preclude development form occurring. Private land developers are actively seeking subdivision approvals throughout the precinct.</p>

SUBMISSION NO.	SUBMISSION	CITY RESPONSE
	<p>Government could contract out and sell developed land ready for housing at \$800+ / m2. Big margin even after infrastructure and development costs.</p> <p>No Government or Council could be empowered to force anyone, nor should they want to force anyone, to be a land bank for fifty (50)+ years without a market value offer. We have had 20-years already.</p> <p>The estimated minimum cost to purchase these properties is \$120 million. \$225/m2 is my estimate for market value for residential land. Individuals may want to negotiate for more. I cannot speak for them.</p> <p>b) Urgent interim funding shared by the Government and the City is needed for landowners if the properties are not purchased as per item (a). This will finally give some relief and support and be a stop gap duty of care while issues are resolved. A payment of \$25/m2 is proposed. Estimated cost of about \$15 million.</p> <ul style="list-style-type: none"> • \$10.29 million for open space in the Green Link is not infrastructure. It has no place in this DCP. Our objections were ignored. This is a monetary arrangement between the State Government and Council. Nothing to do with the Residential landowners. • Good reason to believe there is an approximate \$510,000 so-called "administrative" error in the DCP picked up by Diane English. The DPLH advised us by email to wait for an answer. The City did not wait. It published the DCP with this 	<p>The improvement costs have been included given that, notwithstanding the environmental values that exist in the Green Link, and the justification for acquisition of this corridor to be funded through the MRIF, there are small areas of this corridor that will function as recreational parks that will serve the needs of the local community. The State Planning Framework provides for land reserves for Parks and Recreation to be used for an appropriate local (as well as a regional) purpose and therefore it is possible for any local improvement costs to be identified within the DCP.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>apparent ½ million-dollar error</p> <ul style="list-style-type: none"> The foundation document, the Local Structure Plan for High Wycombe South precinct, is null and void for at least one reason. There is an unlicensed General Industry zone in Stage 1 with a direct interface with residential housing. The separation distance is yet to be defined. This reduces the Nett Contribution Area for this DCP. There is no provision in the DCP for the LSP Item 21.1 Interface Treatments. This includes constructing a wall, a road and a landscaped buffer. This physical barrier stops residential traffic from accessing Sultana Road West. And Sultana Road West becomes a cul de sac opposite 128 Sultana Road West. Traffic management. Sultana Road West becomes a no through road. <p>Traffic from Brand Road and the eastern end of SRW will be diverted past the school block of land and around Brae Road.</p> <ul style="list-style-type: none"> Increases in the DCP Rate which are estimated to be more than \$50/m2, are ignored in the draft DCP. The WAPC and the DPLH struggled to make a case for a viable DCP. The DPLH is inexperienced with DCPs and grapples with finding procedures to assess the submission from the City of Kalamunda, because it grossly exceeds limits set by legislation. We want to see the modelling used by the DPLH and the City during the assessment period. And examples provided of recent monthly reports and audits 	<p>The advertised DCP was revised to rectify this error, prior to the public consultation process. RD09 was updated from a previously published (April 2023) \$511,363.88 to \$1,022,727.76 (December 2023).</p> <p>The zoning of DCA2 is beyond the scope of Amendment 113. The DCP is established pursuant to the planning framework at the time of drafting. Should the LSP be modified in the future, having a consequential impact on the development potential of individual sites, the methodology informing the NCA calculation enables said land to be excluded from the NCA.</p> <p>The interface treatments identified in Part 1 of the LSP are required to be considered and addressed at the time of subdivision and are not included as DCP infrastructure.</p> <p>It is unclear what estimates are being referred to in relation to these increases.</p> <p>To uphold a transparent process, all data and methodologies used to inform the DCP are outlined in the DCPR (Attachment 2) and its appendices. This information has been available since Councils initiation in April 2023.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>prepared by the DCP Section of the DPLH for other Metro housing developments.</p> <ul style="list-style-type: none"> On 11 October 2022, the Statutory Planning Committee was presented with an allegedly misleading document namely the Element WA document, the Amended LSP for High Wycombe South. <p>The alleged misleading text relates to the description of an alleged "Light Industrial Interface Management" in SPN 2173 M-1. Stage 1 has General Industry. Challenge issued.</p> <p>The SPC believed Element WA and the City who said the City was continuing to comply with LPS3.</p> <p>The joint deputation by Diane English and Michael Ryan who reported in detail, the General Industry along the interface, was ignored by the SPC.</p> <p>The City has never had permanent noise monitoring. It had no right to suggest it could always prove it was / is complying. A drive by, by Element WA or the SPC members, would have raised alarm bells.</p> <p>General Industry abounds in Stage 1.</p> <ul style="list-style-type: none"> Delete the 50% cost in the DCP for HWS which is allocated towards upgrading Sultana Road West to RAV 4 standard. Not applicable in the circumstances. Mentioned further on. <p>Humanitarian Rights is the Highest-Ranking Element In the Duty Of Care.</p>	<p>The zoning of DCA2 and the history of the LSP is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The humanitarian outcome has emerged as the Government's greatest challenge here.</p> <p>We are collateral damage of the Perth Airport Link project.</p> <p>88% of the landowners are 60 or more years of age.</p> <ul style="list-style-type: none"> • Has the 30-year DCP been tested against the UN Human Rights obligations adopted by Australia? • Can the State Government ask the Commonwealth to provide its Opinion of locking in people aged in their 60s, 70s or 80s to a 30-year contract without consultation, and agreement, on a fair and reasonable purchase price. <p>The land can still be rezoned light industry.</p> <p>A stop gap, and refundable, equity draw down facility of \$25/m2 will be required when the land is rezoned light industry.</p> <p>Successive Governments have taken so much of our lives with the decision of 2014 and cash is needed now.</p> <p>This money will provide breathing space while the light industry development is rolled out.</p> <p>Comment required:</p> <p>Why We Are In This Situation</p> <p>We should not be examining a draft DCP for residential housing.</p> <p>The Perth Airport Link was announced on 6 August 2014.</p>	<p>All land contained within DCA2 can be developed today. The DCP's proposed lifespan of 30-years does not preclude development form occurring. Private land developers are actively seeking subdivision approvals throughout the precinct.</p> <p>The zoning of DCA2 is beyond the scope of Amendment 113.</p> <p>The zoning of DCA2 and the history of the LSP is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>We lost light industry zoning. The Department of Planning justifies the Stage 3 land being zoned residential by saying that the MRS Amendment for Stage 3 to facilitate light industry land use was only, quote from DPLH "a colloquial name" unquote, for the MRS Amendment for Stage 3 to become Precinct 3 (Residential).</p> <p>It is a frivolous, yet extremely serious denial, which has been prosecuted against us for the past 10-years.</p> <p>There is any amount of evidence to refute the Department's claim.</p> <p>The Director General DPLH and separately the Chairman WAPC, are each invited to present their statement about whether the purpose of the MRS Amendment for Stage 3 of the Forrestfield / High Wycombe Industrial Area</p> <ul style="list-style-type: none"> • dated June 2013 • voted on by Council and then • submitted to the WAPC <p>was, or was not, to rezone land from Rural to Urban to facilitate light industry land use as per the procedure described in the Local Planning Scheme No 3.</p> <p>NOTE: The objective of the final use of land from MRS Amendment for Stage 3 which Council submitted to the WAPC, must be included in the comments by the City.</p> <p>We understood the purpose of the MRS Amendment for Stage 3 was to facilitate light industry land use as part of the Forrestfield / High Wycombe Industrial Area.</p> <p><u>Contract</u></p> <p>We saw Stage 3 as a step along the path to fulfilment of the KHIM contract. This contract was formed when the Government invited</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>us to join their Perth Metro Industrial Development Strategy which had this location as a key logistics area. The Government could have purchased the land then. However, we accepted their invitation and joined the contract willingly. This saved the State Government millions of dollars. Light industry zoning became our future.</p> <p>We have remained loyal, placed our trust in the Government and ready to fulfill our role in the contract by making our properties available for light industry. It was 10 or so year picture.</p> <p>The Government shocked us by breaching the contract, and our trust, in 2014 when light industry zoning morphed into Residential zone in a web of secrecy.</p> <p>Landowners were never provided with the facts, nor consulted adequately.</p> <p>Requests from us for an explanation have gone unanswered.</p> <p>The City of Kalamunda Local Planning Scheme No 3 system was for the MRS Amendment system to rezone land from Rural to Urban.</p> <p>There is no such zone as Urban in the Local Planning Scheme for the City of Kalamunda. It is a trigger point for a secondary decision.</p> <p>So neither the City nor WAPC could claim that Urban was the final objective.</p> <p>Minister for Planning, Mr John Day, acknowledged that in his letter dated 31 March 2014.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The City allocates the land use from the five (5) zones below, once Urban is approved and the MRS Amendment completed.</p> <p>And in some correspondence, the Kalamunda Shire Council says Stage 1 and 3 are changed automatically to Industrial once the MRS Amendment delivered them as rezoned to Urban.</p> <p>The classification of Urban is the trigger point to select the land use from the five (5) options below.</p> <div data-bbox="443 608 1088 823" style="text-align: center;"> <p>ZONES - City of Kalamunda</p> </div> <p>The email dated 10 July 2014 from the Senior Planning Officer, Perth and Peel Planning, Department of Planning to the Kalamunda Shire Council says: "I can see that the MRS & local scheme rezonings have been completed." There is no doubt the LPS3 rezonings were done. The Senior Planning Officer said he had seen it – presumably on a computer screen.</p> <p>We then had to be consulted as affected stakeholders under State Planning Policy, and compensated if the State Government wanted to rezone land from light industry for residential land use.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Stage 3 land was taken in 2014 for public benefit – the Perth Airport Link.</p> <p><u>We were zoned light industrial land use</u></p> <p>The State Government never consulted with the landowners. Landowners never received any offers or options to sell or stay.</p> <p>Consequential losses for landowners and ratepayers are about \$153 million.</p> <p>\$26 million for ratepayers with the landfill site not being sold, and \$127 million for landowners being the gap between light industry market values and average of prices estimated to be paid by Developers for residential.</p> <p>This is a significant amount. We have challenged the process and been met with silence.</p> <p>As another contributor says in their personal submission, quote “Owners of this development area were told that works will be done, infrastructure would be put in to attract developers and that our land would be worth more than the former planned Industrial re-zoning.” Unquote.</p> <p>This is an extremely important point.</p> <p>Once again, we listened to and trusted what the Government.</p> <p>We have come to learn we were living in a false sense of security. Everything was rosy?</p>	<p>The zoning of DCA2 and the history of the LSP is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Houses built here before the first train in September 2020. 10-years have gone by. The talk of higher prices has stopped.</p> <p>People are battling with age and everything that goes with it.</p> <p>What hasn't stopped or disappeared, is the obligation that the Government must consult with landowners about compensation for taking our land, which was designated light industry, and using it for public benefit – the Perth Airport Link.</p> <p>This draft DCP is the catalyst to resolve matters.</p> <p>We await Government engaging with us on that matter. Comment required:</p> <p>DCP Is Wasting More of Our Precious Time In the Twilight Years</p> <p>More of our valuable time has been wasted by calling for us to comment on this untenable DCP. It is not economically viable. And it wilfully disregards our welfare.</p> <p>This is further justification for landowners in HWS to be paid \$25/m2 to give us financial support while this mess continues to be handed around.</p> <p>A payment of \$25/m2 provides some relief. It was required by 30 April 2024 as per previous correspondence. So it is now overdue.</p> <p>People need financial support. The Government and the City are proposing to land bank properties for up to 50 years. 20-years so far.</p> <p>This payment of \$25/m2 will deliver \$250,000 for the typical one-</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>hectare block.</p> <p>More payments will follow if the Government and the City drag this process on.</p> <p>This payment is non-refundable if the Government persists with residential zoning.</p> <p>Land banking properties for 50 years is at the core of the draft DCP.</p> <p>A timeline for completion of this Residential DCP evaluation is shaping to be February 2025 at best. We need financial support now.</p> <p>The City of Kalamunda has a poor track record with planning decisions and timelines in this precinct over the past 20-years. This DCP is already one of the failures.</p> <p>We have suffered badly from the output of the City's Planning Department.</p> <p>Comment required:</p> <p>Proof of Authority to Publish the DCP – Discard the DCP We are yet to be given proof that Government procedures were followed to authorise the DCP to be advertised.</p> <p>Who gave authority to advertise a 30-year DCP, and when.</p> <p>Neither the WAPC, DPLH, SPC nor City of Kalamunda are authorised to approve advertising 30-years for a Residential DCP.</p>	<p>All land contained within DCA2 can be developed today. The DCP's proposed lifespan of 30-years does not preclude development form occurring. Private land developers are actively seeking subdivision approvals throughout the precinct.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>It is 200% beyond the legislative guidelines which specify 10-year lifespan for a Residential DCP. Comment required.</p> <p>Delete the 50% Cost in the DCP to Upgrade Sultana Road West to RAV 4 Standard.</p> <p>There can be no cost for landowners in the residential zone for the road upgrade.</p> <p>State Planning Policy does not specify RAV 4 roads in residential housing estates.</p> <p>Stage 1 DCP says that Stage 1 businesses need RAV 4.</p> <p>The City Planners approved the encroaching industrial zone. The City never consulted with landowners when it drafted the DCP for Stage 1 in 2013, or at any of the reviews.</p> <p>It failed to comply with SPP by not consulting with affected landowners.</p> <p>The DCP for Stage 1, according to law, has never taken effect. This requirement to consult is also recorded in Council Minutes in 2012.</p> <p>Any obligation for Stage 3 to share 50% of the costs for Sultana Road West was wiped out when we wrongly lost our zoning of light industrial in 2014. Our properties were changed from light industrial to residential.</p> <p>All reviews of the DCP for Stage 1 since 2014 should have shown 100% of the RAV 4 road for Stage 1.</p>	<p>As noted in the December 2023 Ordinary Council Meeting Agenda (179/2023) the WAPC provided consent to advertise subject to encouraged modifications in October 2023. A copy of this correspondence can be found at Attachment 10.1.4.1 of OCM 179/2023.</p> <p>Whilst the WAPC encouraged the DCP lifespan be changed from 20 to 30-years, the forecast development rates suggest that 25% of the HWS Residential Precinct will be developed, and consequently make a development contribution within the first ten years. A lifespan less than 30-years would be insufficient to collect funds necessary for substantial infrastructure delivery to service the HWS Residential Precinct and will not provide the required certainty for delivery of infrastructure items, inconsistent with SPP 3.6.</p> <p>Traffic modelling was undertaken to inform the appointment of road infrastructure. The Traffic Modelling Report (TMR) modelled the origin of demand or generator for upgrades to, or the provision of, the various road infrastructure items. The DCP has been drafted using this information and only includes the portion of infrastructure contributions that are attributed to the demand generated by the developed envisaged by the LSP. The apportionment percentage applied is representative of the demand expected to be generated by traffic to and from DCA2. Funds for the balance of the cost will be provided for through other funding mechanisms (i.e. FFHW DCP for the balance 50% of SRW).</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The City will need to provide legal Opinion if it persists with this claim and publishes a DCP with the 50% allocation. The cost of more than \$1 million is unlawful to enforce and must be removed from the DCP for High Wycombe South.</p> <p>The City says</p> <ul style="list-style-type: none"> • a wall is to be built on the northern side of SRW • a road constructed behind it • then a landscaped buffer and • a cul de sac will be formed at 128 Sultana Road West. No through road <p>Residential traffic will not have access to the RAV 4 road.</p> <p>The WAPC or SPC should have identified, and acted, on this deficiency and challenged the City to consult with landowners. We object to paying for 50% of the road upgrade given the circumstances. Challenge issued.</p> <p>Questions were put to the Ordinary Council Meeting on 23 April 2023 by Diane English about Department of Transport approvals and requirements for Sultana Road West. Reply pending. Comment required:</p> <p>DCP RATE CALCULATION</p> <ul style="list-style-type: none"> • \$10.29 million for open space in the Green Link is floating around in the DCP looking for a home. It should have been removed from the draft DCP before publishing as requested. It is allegedly a breach of SPP 3.6 Section 6.10.1 Infrastructure contributions can only be for the provision of capital items. This threatens to increase the rate by \$17/m2 Comment required: 	<p>The zoning of the adjoining FFHW Industrial Area and the history of its LSP is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<ul style="list-style-type: none"> • It seems there is an approximate \$510,000 so-called “administrative” error in the DCP. Diane English asked me about it in late December. We couldn’t understand it. We reported this to the City on 31 December 2023. We had no reply so contacted DPLH. We wanted the true picture to be in the published DCP. Government documents should be accurate when published. We contacted DPLH by email. They told us this would be addressed. We were asked by email by DPLH to wait until early / mid February. We replied by email and agreed. Without notice, the draft DCP was published by the City before that date. A reply from DPLH is outstanding. Diane English seems to have saved landowners from a \$500,000+ debt. If there is this error of \$500,000, please explain how the City came to include this. Comment required: • The foundation document, the LSP for High Wycombe South precinct, is null and void. There are arguably clear breaches of SPP and health laws. A party, or parties, made serious errors. The parties involved at various stages in the decision-making process include <ul style="list-style-type: none"> a) Planning Department of the City of Kalamunda b) Perhaps Councillors of the City of Kalamunda c) Element WA – the external planning consultants d) Department of Planning / DPLH e) WAPC 	<p>The improvement costs have been included given that, notwithstanding the environmental values that exist in the Green Link, and the justification for acquisition of this corridor to be funded through the MRIF, there are small areas of this corridor that will function as recreational parks that will serve the needs of the local community. The State Planning Framework provides for land reserves for Parks and Recreation to be used for an appropriate local (as well as a regional) purpose and therefore it is possible for any local improvement costs to be identified within the DCP.</p> <p>The advertised DCP was revised to rectify this error, prior to the public consultation process. RD09 was updated from a previously published (April 2023) \$511,363.88 to \$1,022,727.76 (December 2023).</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>f) Statutory Planning Committee</p> <p>g) The City of Kalamunda still does not have a noise monitoring system. The City has no credibility with its claims that no noise is emitted from any business in Stage 1. 24-hour permanent noise monitoring is the only way it will establish the truth.</p> <p>h) The City hides important facts from landowners. For example, Development Approvals in Stage 1</p> <p>i) The City has breaches of its Industrial Design Guidelines with poor visual impact through gaudy and/or non-conforming industrial businesses head-on to residential housing</p> <p>The Nett Contribution Area (NCA) of 594,129m2 is consequently not achievable.</p> <p>The NCA will likely be reduced from 594,129m2 to about 460,000m2. There is an argument that an area which extends to 450 metres x 480 metres is affected by noise. This is 216,000m2. NCA would be reduced to 378,000m2.</p> <p>This would have a massive impact on the DCP Rate and challenge any remaining viability to pursue residential for HWS.</p> <p>The City has failed to assess the area of land affected by Stage 1. It has no noise monitoring results. It fails to assess the gravity of the issues.</p> <p>The only recognised data is the EPA Generic Guidelines for Separation Distances. These principles are accepted by the WAPC and DPLH.</p> <p>For Ascent Steel, Mader, Allwest and FBR Steel, the EPA Guidelines for separation distances for these businesses is 500 – 1,000</p>	<p>The zoning of DCA2 and the history of the LSP is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>metres. This means a minimum of 500 metres, and it might have to be 1,000 metres. This looks about right from feedback along Brae Road.</p> <p>For Golden Eggs, the EPA Guidelines for separation distance is 200 to 500 metres. Their non-conforming loading bay adjacent to, and facing the road, makes 200 metres look about right.</p> <p>One thing certain is that the NCA is less than 594,129m2.</p> <p>The consultant group which prepared both the Local Structure Plans for this precinct, is Element WA.</p> <p>There is arguably a glaring failure in both LSPs to comply with at least</p> <ul style="list-style-type: none"> • SPP 4.1 Industrial Interface • SPP Precinct Design 7.2 C5.2.2 and • Liveable Neighbourhood Policy <p>Element WA need to explain how they convinced the City and the DPLH to accept their plan of no protection at all, for people living on the northern side of Sultana Road West for the type of businesses established in Stage 1 – if this is what happened.</p> <p>How did Element WA come to provide no buffer, given there is General Industry on the interface and the preceding planning document was the District Structure Plan prepared by TPG Consultants. WAPC approved this document in October 2016.</p> <p>It said there would be a 200-metre buffer between Stage 1 and the residential precinct. And TPG assumed there would be WAPC definition Light Industry in Stage 3, not the much worse outcome which exists now, with General Industry.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Replies from Element WA to our correspondence remain outstanding. Not even acknowledgment that they have received the enquiries.</p> <p>Proof from Developers about Separation Distance The property at 123 Sultana Road West was advertised for sale by Century 21 Real Estate from June 2023 to February 2024.</p> <p>There was no interest from developers. The Agent proactively contacted developers.</p> <p>The answer was that the proximity of Stage 1 meant there would have to be a buffer defined, before a residential developer knew how much land could be used.</p> <p>The property owners along the central part of Sultana Road West are faced with the situation they cannot sell land to either a residential or an industrial developer, because of the constraints of residential zoning / industry interface.</p> <p>The Minister of Planning has been asked to make a ruling on the Mexican standoff.</p> <p>The City blames the Government and the Government blames the City.</p> <p>A reply is outstanding from the Minister for Planning.</p> <p>Obviously a buffer is needed, so the NCA of 594,128m2 will be reduced.</p> <p>The DCP rate would increase by \$20/m2 if the NCA is 460,000m2.</p> <p>It would climb to be \$41/m2 higher if the EPA Generic Guidelines for Separation Distances are applied.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The City is unable to present noise monitoring data to discredit this claim. It is based on individuals lodging their objections to the City about noise and paint odours.</p> <p>The continuing statements from the City that “..we are fixing things..” is worthless after 7 years of saying the same thing.</p> <p>Permanent noise monitoring provides the facts. And the same with permanent odour sampling.</p> <p>General Industry is not supposed to interface with residential housing.</p> <p>We lost faith in the City a long time ago. They are trying to prove the EPA Generic Guidelines are wrong.</p> <p>The truth is that the City failed the Precautionary Principle in SPP.</p> <p>Comment required:</p> <p>Item 21.1 in the LSP is ignored.</p> <p>This is for Interface Treatments. The Director Development Services (DDS), Mr Nathan Ritchie, advised Diane English and me during a meeting, that the Developer will pay for</p> <ul style="list-style-type: none"> • the wall that is to be built on the northern side of SRW • a road constructed behind it and • then a landscaped buffer <p>This logic was firmly rejected by Diane English and me at the meeting.</p> <p>The Developer subtracts costs from the five (5) or so owners of the affected properties along SRW.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>We are not paying for the buffer for Stage 1. Challenge issued.</p> <p>SPP says Stage 1 pays for this.</p> <p>More broadly, WA Legislation says the polluter pays.</p> <p>The landowner for each property along SRW, in the view of the DDS, would, incur a cost of about a further \$1.5 million for each property, or \$150/m2 on top of the DCP Rate of \$72/m2, if the City carries out this threat in the DCP.</p> <p>This is because developers pass on costs to landowners. They are not a charity.</p> <p>The Government approved the misleading no-buffer scenario in the two (2) Local Structure Plans presented by Element WA.</p> <p>The WAPC approval of no buffer was a mistake, and especially in 2023, when the nature of Stage 1 was clear for all to see.</p> <p>The Government could instruct the City to issue notices to the offending industries to be bulldoze the premises back to bare earth if it chose to.</p> <p>No noise pollution, by law, is allowed to exceed the boundary of the business. This is the definition of light industry.</p> <p>The Minister for Planning, Mr John Day, made that a Condition of the approval to develop Stage 1.</p> <p>And an email reply to us from the City of Kalamunda dated 2</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>February 2017 about a noise complaint, says. "The industrial development zone does allow for some limited fabrication consistent with the definition of light industry. I will have the matter investigated and let you know."</p> <p>The promised reply never came.</p> <p>Some businesses have had 7 years to comply, and failed. None of the businesses are monitored by the City for noise. The City has no credibility without facts.</p> <p>An estimate of a minimum cost of \$6.8 million for Interface Treatments was submitted in the deputation to the Statutory Planning Committee on 11 October 2022.</p> <p>This infrastructure is missing from the DCP.</p> <p>Item 21.1 must be included in a Residential DCP.</p> <p>The increase the DCP Rate for the Interface Treatments is \$14/m2 (minimum).</p> <p>Comment required:</p> <p>Take The Opportunity To Rezone Our Properties Light Industry Land Use:</p> <p>The City's DCP for High Wycombe South Precinct is unsustainable – conceptually, in law and in the detail.</p> <ul style="list-style-type: none"> • Council should openly support a bipartisan resolution. • Economics and efficient land use support the proposal for light industry land use. 	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<ul style="list-style-type: none"> • The higher land values for light industry give people scope to leave in a shorter time. • A stop gap, and refundable, equity draw down facility of \$25/m2 will be required when the land is rezoned light industry. Cash flow. • This residential development has been parachuted into a long-term Government industrial development strategy. It is a misfit. 10-years after the Perth Airport Link was announced, the Government has us heading down a dead-end street. • This small infill location surrounded by a highway, adjacent General Industry, marshalling yards, a new Perth airport runway close to HWS and a high DCP, is unattractive for residential land use. • Light Industry demand is strong here. 10-year lifespan DCP for Light Industry • Light Industry means the City of Kalamunda could sell the landfill site for about \$26 million. • The Maida Vale South Residential development can be released to provide the population growth near the train station. Population forecast of 6,000 people. The same as High Wycombe South Precinct. • Stage 1 could remain as it is if Stage 3 goes to Light Industrial. • Provide employment opportunities for residents in High Wycombe and surrounding suburbs, or those coming by train. • The 50% contribution from Stage 3 for the upgrade of SRW could be in the light industry DCP. It cannot be in the residential DCP. 	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Compiled by [REDACTED], High Wycombe. Contributions from fellow landowners.</p> <p>Submitted at about 5.30am Monday 6 May 2024</p>	
25 (IN24/29268 D86)	<p>To the City of Kalamunda,</p> <p>We would like to bring to your attention that we fully support the submission attached and that it is adopted.</p> <p>To many years have been wasted. Our family has paid rates in the area since 1943. It is totally unfair to be treated this way.</p> <p>Thanking you [REDACTED]</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	
26 (IN24/293439 A7)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
27 (IN24/2E83C8 88)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
28 (IN24/2E9F80 79)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
29 (IN24/2EA021 92)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
30 (IN24/2EA67 C85)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
31 (IN24/2EDC0 F6B)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
32 (IN24/2EE86B 86)	<p>Moving Forward for the DCP to be rejected</p> <p>As residents in SmokeBush Place in High Wycombe for 35years. We are both retired and have health issues.</p> <p>There is no prospect of downsizing, moving closer to our children should we require it II AGED CARE II</p> <p>We have been trying to sell for these reasons for 12 years. While we have had some enquiries, on-one has been prepared to make a firm offer after checking planning issues for the area.</p> <p>We have been in this "HOUSE ARREST" situation since 2004 when the Kewdale/Hazelmere Itergrated Master Plan was first published. No One in Western Australia should be subjected to 20Years of Total Uncertainty about the Future of their Property</p> <p>NO ONE WILL BUY THE UNKNOWN</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Our Land in this area is just 14kms from the City. We have Water, Power, Gas, and NbN. Connections to the whole rail network. There is an existing local road network connecting to the major highway, in addition to High Wycombe, Forrestfield, Kewdale, and Hazelmere industrial area.</p> <p>Our land price must be in a certain bracket, or a developer wont come because of Profit Margin.</p> <p>If its too expensive our land will become sterile and unsaleable. Are we being told what price to SELL our land.</p> <p>Are we to subsidise our land for the new owners.</p> <p>A small development requiring a 40year time-frame will not solve the housing crisis.</p> <p>Why would we sell if we cant replace this property.</p> <p>The Macro Plan attachment 10.1.1.12 24/3/2023 Highlights</p> <p>1/ General Remarks 2.2</p> <p>2/ Sensitivity Analysis 4.5</p> <p>3/ Conclusion and Recommendations 8.1,8.2,8.3.</p> <p>They suggest that residential development is unviable and query whether planned use of land should go back to Industrial use. Why doesn't the City of Kalamunda accept the views of it's own consultants.</p>	<p>The zoning of DCA2 is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>In our so called future HWS residential precinct, we have Roe HWY noise, Plane noise, Industrial noise, Train noise.</p> <p>We are asking for the DCP to be Rejected and the High Wycombe Precinct rezoned back to Light Industrial, as was proposed in 2013 for good reason consistent with Industrial land Policy and requirement.</p> <p>Having a DCP for Industrial Development would be around \$20-\$30sqm as in stage 1. Having a DCP for 30 yrs is Beyond Belief with build out approximately 2064</p> <p>We believe and all the landowners in this area have been extremely patient with the City of Kalamunda and various State Government Agencies who have been involved.</p> <p>The Proposed DCP must be rejected.</p> <p>We Strongly Support Attachment Submission</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p>	
33 (IN24/2E1181 08)	<p>██████████ provide the following comments relating to the DCP. The submission incorporates contributions from project consultants C ██████████ ██████████.</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>We understand [REDACTED] are the first developer to seriously commit to High Wycombe South, with active contracts in-hand for circ. 6.5ha of land in and formal subdivision applications lodged. We are at the forefront of the DCP's implications.</p> <p>As the first we are continuing to face considerable headwinds due to the lack of infrastructure. Those who come after us will benefit from the work we have and are still doing. The burden of a very high DCP rate is another considerable challenge.</p> <p>Our project will deliver community benefit by essentially unlocking the first stages of development – an outcome both the State government and City are very keen to see. [REDACTED] is prepared to start civil works as soon as the subdivision is approved, provided it's feasible to do so. Accordingly, we request serious consideration be given to the DCP matters raised below.</p> <p>The DCP has major feasibility implications for our project. It is paramount that the DCP rate is kept in-check and that operational items allow the project the to be delivered efficiently.</p> <p>Many passages within Macroplan's High Wycombe South Development Contribution Plan & Feasibility Analysis report are as relevant and accurate now as when the report was authored in early 2023, including;</p> <p style="padding-left: 40px;"><i>... involve adopting a 'feasible' DCP rate of \$60/m2. This is informed by the sensitivity analysis presented, which demonstrates this is the highest DCP rate at which development remains generally feasible</i></p> <p style="padding-left: 40px;"><i>... require a level of State Government co-funding for major infrastructure, including the TOD connector road. This would</i></p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p><i>likely involve The City negotiating with the State Government in relation to major infrastructure requirements...</i></p> <p><i>The City exploring alternative funding sources for local open space surrounding Environmental Conservation areas</i></p> <p><i>The timing and amount of the DCP is significant, given the DCP amount is considered when negotiating a land price.</i></p> <p><i>... a challenge to be addressed by early movers... able to negotiate infrastructure works outside a formal DCP process (e.g. WIK/Voluntary Contributions), especially during the next 1-5 years</i></p> <p><i>... allowing individual developers to negotiate infrastructure contributions on a project-by-project basis for the next 1-5 years, before implementing a DCP... triggering development activity and creating critical mass required to bring forward civil works that otherwise may not be delivered for many years. After an agreed sunset, a DCP rate may then apply</i></p> <p>The thrust of these passages are critical - reducing the DCP rate and flexibility to aid early movers.</p> <p>The following points summarise identified DCP issues, opportunities, and clarifications;</p> <ol style="list-style-type: none"> 1. <u>Green Link Land Acquisition</u> Consistent with the City of Kalamunda's position, we do not support the inclusion of "Green Link" land acquisitions costs as a DCP item. 	<p>The land estimates incorporated into the DCP do not include land within the 'Green Link' identified as LOS.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>These areas have been identified as regionally significant for biodiversity reasons and have been recognised by the City as being worthy of reservation under the MRS as Parks & Recreation Reserve. The 'Green Link' is effectively a regional environmental conservation area.</p> <p>Pursuant to SPP 3.6, DCP's are only intended to include local and district level open spaces, not regional open space. Regional open spaces and future MRS reserves are to be appropriately funded by the State.</p> <p>It is submitted that the inclusion of this as a DCP item would not meet the "need and nexus" principle of SPP 3.6. That is, the need and demand for this regional open space/green link to be acquired and reserved is not directly linked to or created by the urban development of the Development Contribution Area (DCA). The need is beyond the DCA itself and the benefit will also extend beyond the DCA based on the regional significance of the environmental values in this area.</p> <p>We strongly support the exclusion of this land acquisition cost in the DCP.</p> <p>2. <u>Green Link Improvements</u></p> <p>For the same reasons outlined above we submit that the cost for Improvement of Local Open Space within the Green Link should not be a DCP cost (POS3, POS4 and POS5).</p> <p>The land acquisition is not included in the DCP, and we submit this is correct approach. Therefore, the improvement of these open spaces should also not be included in the DCP.</p> <p>All of these POS areas are recognised as part of a future ecological corridor (Green Link) based on the regionally significant biodiversity values present. It is understood that</p>	<p>The improvement costs have been included as a DCP cost given that, notwithstanding the environmental values that exist in the Green Link, and the justification for acquisition of this corridor to be funded through the MRIF, there are small areas of this corridor that will function as recreational parks that will serve the needs of the local community. The State Planning Framework provides for land reserves for Parks and Recreation to be used for an appropriate local (as well as a regional) purpose and therefore it is possible for any local improvement costs to be identified within the DCP.</p>


SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>there is adequate environmental value for these spaces to be reserved under the MRS as Parks & Recreation. The open space is not a local or district open space area, but rather a regional environmental conservation space.</p> <p>Accordingly, we submit that the improvement of these regional environmental conservation spaces should not be a cost borne by the DCP. We submit that the inclusion of this as a DCP item would not meet the “need and nexus” principle of SPP 3.6. That is, the need and demand for this regional open space/green link to be improved is not directly linked to or created by the urban development of the Development Contribution Area (DCA). The need is beyond the DCA itself and the benefit will also extend beyond the DCA based on the regional significance of the environmental values in this area.</p> <p>We request that the improvement costs for POS3, POS4 and POS5 are removed from the DCP.</p> <p>3. <u>TOD Connector</u></p> <p>At present 100% of costs relating to land acquisition and construction of the TOD Connector Boulevard (TPD BLVD) between Milner and Brand Road will be borne by owners through the DCP.</p> <p>As identified by Macroplan, scope for this considerable cost to be funded via another means is strongly supported. We’re keen to understand what efforts the City made on this prior to the full value being retained in the advertised DCP? Further, have endeavours continued with the view to reducing the rate closer to the acceptable \$60p/sqm rate?</p>	<p>At the time of drafting the DCP, the “potential future flyover”, while identified on LSP documentation, is not approved or proposed for delivery within the proposed lifespan of the DCP (30-years). The demand for the “future flyover” will be explored as part of planning for Maida Vale South.</p> <p>To inform the DCP and to ensure compliance with the need and nexus principles outlined in SPP 3.6, road infrastructure costs contained within the DCP have been apportioned, where appropriate, in accordance with the percentage of demand informed by the TMR. The TMR determines the origin of demand or generator for upgrades to, or the provision of, the various established infrastructure items.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The intent of the TOD BLVD is to extend into the future Maida Vale South urban area, therefore for the benefit to reach far beyond the High Wycombe South precinct.</p> <p>In addition to, or an alternative State funding being provided, a reduced apportionment should be considered.</p> <p>Further, we submit that the POS Cost for the TOD BLVD may not qualify as a valid DCP item.</p> <p>It appears that this item relates to verge landscaping of a section of a Future Connector/TOD Connector that is not part of the DCP costings for road infrastructure. It will not function as an area of Local Open Space, but rather a landscaped road verge.</p> <p>It is questionable if this would meet the need and nexus principles of SPP 3.6. It would seem a desirable streetscape outcome, however we submit that it is not infrastructure needed by or demanded by the future community in the context of developer contributions and the need and nexus principle.</p> <p>We submit that the item should be deleted from the DCP.</p> <p>4. <u>Road Infrastructure</u></p> <p>In regard to roads infrastructure, Table 1 and Figure 5 in the DCP Report do not seem to align in regard to the extent of road(s) to be included in the DCP. In addition, there appears to be some inconsistencies within Table 1 itself (between columns) as to the extent of road covered by the DCP.</p> <p>We submit that Table 1 and Figure 5 should be reviewed and updated to clearly align and show and refer to the exact extent of roads to be covered by the DCP.</p>	<p>Acknowledging there are no approvals, and therefore no certainty, for the “future flyover” into Maida Vale South, the TMR models 100% of traffic on the TOD Connector Boulevard being generated from the HWS Residential Precinct.</p> <p>Should the “future flyover” be approved in the future, the apportionment of this infrastructure item (RD04) could be modified, through a complex scheme amendment, in accordance with demonstrated modelling.</p> <p>The City has modified the 2024 DCP, in response to this concern; removing improvement costs for the TOD Boulevard POS</p> <p>The City has rectified this formatting error.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>In light of the inconsistencies between Figure 5 and Table 1, we also submit that the road costs should be reviewed to ensure they reflect the correct extent of road intended to be covered by the DCP.</p> <p>5. <u>Drainage Basins / POS Construction</u></p> <p>Section 2.3.2 of the DCP Report lists the items included in costs for the construction of drainage basins. It appears that some of these items would not be relevant for drainage basins e.g. furniture, reticulation etc.</p> <p>This list of items is as per Section 2.3.1 of the DCP Report which relates to POS Construction. The detailed costings tables in the DCP Report appendix also appear that there may be POS costs covered in Drainage costs. We are concerned that there may be some “double up” of costings in this regard. We also note that providing potable water supply to irrigated POS is beyond a minimum standard.</p> <p>We submit that the City should review and check all POS and drainage costs to ensure there are no double ups and also edit the reporting and costing tables as required to clarify this matter.</p> <p>6. <u>Works-in-Kind & Reimbursement</u></p> <p>Developers in the area will cede land required by the DCP and/or undertake DCP works-in-kind as part of subdivisions. This will offset, either in part or as a whole, their DCP contribution and also may result in a developer having a DCP credit or being owed reimbursement by the DCP.</p> <p>It is critical that the City is in a position to be able to negotiate a reasonable and commercial timing for any owned</p>	<p>In 2024 the City engaged an independent quantity surveyor to:</p> <ul style="list-style-type: none"> a) Establish an appropriate percentage of escalation figure to be applied to the 2023 Bill of Quantities; and b) Undertake a comparative peer review of the Drainage and public open space (POS) BOQ's to ensure no duplications in quantities. <p>The QS ultimately concluded there were no duplications with POS & DB quantities and estimates.</p> <p>The City's Local Planning Policy 24 (Development Contribution Plans) and Local Planning Policy 25 (Interim Development Contribution Arrangements) provide guidance, outlining the City's position with works in kind.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>reimbursement. This is particularly relevant for first and early developers in the area as it is noted that the City at this stage would not have collected any DCP contributions.</p> <p>We submit that the DCP Report should address this matter and provide an approach and methodology that will enable timely DCP reimbursement when owed or other negotiated outcomes / legal agreements as appropriate for infrastructure provision and reimbursement.</p> <p>7. <u>DCP Rate</u></p> <p>It is integral that the contribution rate is feasible and that it does not restrict development in the area on financial grounds.</p> <p>The Developer Contribution Plan & Feasibility Analysis completed by Macroplan in 2023 refers to a rate of \$60/sqm being a feasible rate, this being informed by the sensitivity analysis presented by Macroplan which demonstrates this is the highest DCP rate at which development remains generally feasible.</p> <p>On this basis, it is submitted that the DCP should be reviewed with a view to achieving a more feasible rate that is close to \$60/sqm. We submit that removing and/or reassessing items as discussed above would make the DCP rate far more feasible for developers in the area.</p> <p>8. <u>Other Funding Sources</u></p> <p>As the DCP is a “contribution” plan, it is appropriate and correct that other funding sources, outside of developers, for</p>	<p>The DCP will provide a clear and accountable instrument for the City to seek external grand funding from third parties (e.g. State Government) to support the delivery of all infrastructure identified in the DCP and to supplement municipal funding, consequently reducing the contribution rate.</p> <p>The City's Advocacy Strategy – Kalamunda Advocates is a structured process of influencing others to create change. It is often aimed at decision makers to make positive changes to public policy or resourcing for community benefit. The strategy seeks to drive effective change at Government policy and steer investment towards ensuring local priorities are supported.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>infrastructure are explored by the City now and on an ongoing basis.</p> <p>This is particularly important in High Wycombe South as it is widely recognised that development in this area is challenging from a financial feasibility and commercial perspective for various different reasons.</p> <p>The DCP Report should continue to identify possible funding alternatives that the City can investigate.</p> <p>9. <u>Impact of Other Issues</u></p> <p>We have become aware of the serious concerns of some owners in High Wycombe South of the impact of neighbouring general industrial uses, and their subsequent desire for considerable changes to the LSP and DCP. We understand the affected area to be primarily along the Sultana Road West interface, though we're not privy to the number or extent of owners impacted.</p> <p>We are sympathetic to their situation and sincerely hope the State, City and owners can come to an amicable solution in the near term.</p> <p>We anticipate the DCP is only able to respond to the current planning framework. Further, the DCP (i.e. contribution rate) may (or may not be) be affected by any changes in land use overtime in the LSP area. Any formal changes to land use zoning would likely take a couple of years.</p> <p>Ongoing issues and uncertainty in the Sultana Road West part of the LSP area create uncertainty for developers in the area regarding an increase to the DCP contribution rate into the future as part of reviews. This fact supports the concept of keeping the DCP contribution rate down at this stage so that</p>	<p>The recommended Council Resolution requests the City of Kalamunda Chief Executive Officer continue to undertake an advocacy campaign focussed on minimising infrastructure cost to the DCP, encouraging government pre-fundings for enabling infrastructure, and supporting the transitions of landowners and activation of development in the High Wycombe South Residential Precinct.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>any future increases in contribution rates may be able to be accommodated more easily without reaching the “threshold”.</p> <p>We ask that the finalisation (gazettal) of the DCP and any ongoing planning/land use issues within the SP area does not delay approvals or development of initial residential stages.</p> <p>We appreciate the opportunity to make this submission and look forward to a mutually beneficial outcome for all stakeholders.</p> <p>Yours sincerely,</p> <p></p>	
34	<p>To Secretary City of Kalamunda Submission for DCP Amendment No 113 of Kalamunda Local Planning Scheme No 3 High Wycombe South Development Contribution Area 2 and Development Contribution Plan Report</p> <p>We have been residents in the HWS Precinct since July 2007 .</p> <p>We purchased after considering all aspects of our requirements , one which was the ensuing re-zoning development for Light Industrial in our precinct .</p> <p>Fast forward to 2024 and we have been left with no direction to turn in regards to being able to sell our property .</p> <p>The incompetence and mismanagement of this supposed development to a residential precinct in a timely manner is an utter</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>disgrace to all involved .</p> <p>If this was a Private Enterprise operation it would be in Receivers hands by now .</p> <p>How any Govt authority (Local or State) can be proud of the results thus far is a mystery to me . The results are actually quite astounding as no local or state representative has bothered to answer significant questions or attend ratepayers meetings with any merit. There are many instances of ignorance and promises not kept which are not acceptable to Tax Paying Rate Payers like ourselves.</p> <p>The proposed DCP would surely be seen to be unviable for any Developer . We have spoken to representatives from 3 possible developers and they have categorically suggested there will be no time wasted on this development for their companies with such a high DCP and small landholding .</p> <p>We believe our lifestyle or lack thereof has been hijacked by a misdirected government . We have had our property valued in recent months and the valuers have suggested a less than market price as the precinct has been earmarked as a disaster development with no possible outcome in the forseeable future .</p> <p>We are decidedly unhappy with the current position as my wife and myself are 65 years of age and had intentions of selling by this stage and downsizing to a more manageable property . The likelihood of this happening without a reversal to Light Industrial zoning is almost zero .</p> <p>We would like all involved with this seemingly failed attempt at Population Infill within our precinct to please reconsider the direction of any future development and return it back to Light Industrial .</p>	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>Kind Regards</p> <p>██████████</p> <p>██████████</p> <p>██████████</p> <p>██████████</p> <p>Attached:</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p> <p>'Pro-forma submission #2 (Refer verbatim submission 13) attached to submission.</p>	
<p>35 (IN24/5A93D C74)</p>	<p>High Wycombe South Local Structure Plan DCP Submission.</p> <p>This submission is being provided by ██████████. We have been residents of the area covered by the High Wycombe South Local Structure Plan and its proposed DCP since 2002. Our residential address is ██████████</p> <p>We totally disagree with any decision to extend the normal scope of the DCP past the normal ten year legislated lifespan. We do not support any extension to a 20 or 30-year proposal as outlined in the DCP due to the aging population in this area. The 30-years lifespan is a 200% increase over the legislated 10-years. Is the City so incompetent that it cannot manage to complete this development in the 10-year timeframe other councils have to abide by? If so then maybe they should be stripped of this responsibility</p>	<p>The nominated lifespan of the DCP does not impact upon the priority and timing of infrastructure delivery. Infrastructure is delivered through the DCP as funds become available, through levied development contributions, or at times sooner through alternative funding mechanisms (i.e. loaning from municipal funds, advocacy funding etc.). While alternative pre-funding mechanisms can positively influence the priority and timing of infrastructure delivery, the levying of development contributions rate is contingent</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>as we are an aging population. It has been calculated that 88% of residents in this area are 60 years or above. Many residents are between 70 and 90 years of age.</p> <p>We believe the methodology when calculating the DCP is flawed as the numbers used are already out of date. This was due to developers being invited to contribute to the formation of DCP as major stakeholders, they are not major stakeholders until they own the property. The owners who are the actual major stakeholders in this area were not given the same courtesy. We residents would of informed the council from the very beginning that the numbers being discussed between the developers and staff were unviable as no one could replace their existing lifestyle including location with the figures being provided. Why were developers involved in the production of this document when they have a direct financial conflict of interest? Why did the council agree to setting a value of \$140/square metre for our land to make it viable for development as this could be perceived as the council being involved in market manipulation? Does this sort of action by the council open it up to accusations of corruption? This looks even more suspicious when they redact the names of the developers who were involved in the formulation of this document (DCP). Is it normal for developers to be part of the council's planning process other than when they own the land and want to redevelop it? Is it normal for developers to be asked for input on property they don't own and without the consent of the people who actually own it?</p> <p>Developers are only required by legislation to provide 10% of the land for public open space or cash in lieu. Any other land which is proposed for either POS or for environmental reasons above this 10% requirement should not be included in the DCP and needs to be funded by either the state government or out of funds held by</p>	<p>upon the rate of development in the HWS Residential Precinct. It is important for the DCPs lifespan to be sufficient to ensure development contributions are received from all future urban development in the HWS Residential Precinct, upholding equity in the application of the DCP.</p> <p>The drafting of the DCP did not involve the input of developers. The City commissioned a Feasibility Analysis, undertaken by a third party property economics consultant, which included stakeholder engagement to understand development interest within the precinct. The City did not have any involvement in this consultation.</p> <p>The rate informing the land estimates (acquisition rate) is established using annual land valuations undertaken by an independent and licenced land valuer.</p> <p>The LSP identifies a surplus of LOS throughout the HWS Residential Precinct. Excluding the 'Green Link', 15% (14.42 hectares) of the HWS Residential Precinct is comprised of LOS, of which:</p> <ul style="list-style-type: none"> a) 10% (9.95 hectares) exists under public tenure (City of Kalamunda).

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>the local council. The residents or the developers of High Wycombe South LSP should not be funding anything above the 10% requirement for the DCP. The council's lofty dreams for this area should not be funded by us as we had little or no input in to the development of the plan.</p> <p>This plan by the city of Kalamunda for an attractive green, family friendly area has already been compromised in the cell 8 area by the approval of general industries along Sultana Rd West. The noise, smell and traffic issues along Sultana Road West has already devalued the proposed residential area in cell 8 and has potentially sterilised many properties from future development. Feedback from realtors and developers is that no one is interested in buying along Sultana Rd West (unless at bargain basement prices) due to future development complications ie the provision of a sound wall along Sultana Road West as a requirement for approval during the application stage for this area. Such a financial impost would make development unviable for land-owners and developers. This situation is due to the impact of the development of stage 1 along Sultana Road West. The residents who live across from the light industry development have been making complaints to the City of Kalamunda for years. We live in Brae Road and we have made numerous complaints to both our councillors, council and state government (Stephen Price). No one has answered our question of how a general industry was allowed to get approval to operate in a light industry zone. This has impacted the area enormously and if it was approved initially as light industrial (which it wasn't) and its scope and use has out grown this zoning then it needs to be relocated in a general industrial area away from any residential zoning. This change of circumstances in cell 8 will have a direct impact on the DCP's methodology and any assumptions about its future viability. The only viable future we see for this area is for it to</p>	<p>b) 5% (4.48 hectares) exists under fragmented private tenure, proposed to be acquired through the DCP.</p> <p>Due to fragmented distribution and ownership of LOS throughout the HWS Residential Precinct, the DCP proposes to coordinate the acquisition of 5% of LOS land remaining in private tenure. This will provide a total of approximately 15% of LOS within the HWS Residential Precinct and represents \$6.88m, or a cost contribution of \$11.57/m².</p> <p>The zoning of DCA2 is beyond the scope of Amendment 113.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>be rezoned light industrial to re-establish a new buffer zone between future residential and existing industrial areas.</p> <p>Finally we fully endorse the group submission for this area.</p> <p>Yours sincerely [REDACTED]</p> <p>2nd of May 2024</p> <p>'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.</p> <p>'Pro-forma submission #2 (Refer verbatim submission 13) attached to submission.</p>	
<p>36 (IN24/293A6 AD2)</p>	<p>Further to my meeting with your two members from the Strategic Planning Team I would like to lodge my submission regarding the proposed outrages DCP of \$70.41/m and the proposed 30-year time-frame</p> <p>Item 1.0 DCP amend to \$60/m</p> <p>The City of Kalamunda lists the summary of infrastructure and administration costs to be \$41,834,458.27 together with tables listing the breakdown of estimated costs but not all of the summary costs have a breakdown of costs. The Land Costs being \$8,736,411.60 refers to Item 2.6 for roads and drainage but there is no substantiation of these cost presented by the City of Kalamunda. This figure could be overestimated and if so the DCP would be less.</p>	<p>The DCP, since initial publication in April 2023, includes a comprehensive Bill of Quantities and estimates in the appendices for all infrastructure proposed for inclusion in the DCP.</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>The City of Kalamunda also failed to provide substantiation of the Net Contribution Area of 594,129m which forms a large part of the equation. If this NCA has been underestimated the DCP would be less.</p> <p>If the area was scaled off the structural plan using a planimeter you could not guarantee the area to be accurate. There should have been a table showing all block sizes less roads and drainage areas to substantiate the NCA</p> <p>I believe because of these two discrepancies the City of Kalamunda has failed Clause 1.Sb which requires the City of Kalamunda to be fully transparent when calculating the DCP. One could interpret that these two figures may have been manipulated to get the DCP of \$70.41m</p> <p>This DCP figure exceeds developer's expectation. I know this from firsthand experience because I signed an offer and acceptance with a Developer subject to the value of the DCP. During their due diligence stage they had a meeting with the City of Kalamunda and they discovered what the DCP was going to be and as a consequence they withdrew their offer. This was a total set back and heart wrenching for me and brought home to me how irresponsible the City of Kalamunda can be when presenting an outrages DCP of \$70.41m and having total disregard for the ongoing effect it is going to have our community. Current DCP is around \$58/m, so the DCP should be amended to \$60/m to encourage Developers to start and invest now.</p> <p>Item 2.0 30-year Time-frame Amend to 15 Years</p> <p>How ridicules is this, the WAPC recommends a 10-year (Standard) to 20-year maximum timeframe and the City of Kalamunda has</p>	<p>The NCA is calculated using the NCA definition outlined in the DCPR, with a comprehensive breakdown of this calculation provided in the Cost Apportionment Schedule appended to the DCPR.</p> <p>All land contained within DCA2 can be developed today. The DCP's proposed lifespan of 30-years does not preclude development</p>

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
	<p>totally ignored this recommendations and has continued with a 30-year time-frame on the basis that the area is fragmented and as a consequence development want proceed.</p> <p>What utter nonsense the people in this area are all over 65 years old so over a 10-year period they will all want out they are not going to wait 20-years when they are 85 years and over.</p> <p>The City of Kalamunda should be reminded that this all started over 10-years ago and it's still not finished, so even with a 10-year time-frame makes it 20-years and hence a 20-year time-frame will be 30-years.</p> <p>The people didn't start this, the City of Kalamunda did and they should not be allowed to drag it on past a 20-year time-frame.</p> <p>If the developers see a 30-year plan and reviews every 5 years they know the DCP will just keep going up so there will be no incentive to invest now.</p> <p>The 30-year plan has to be deleted and replaced by the WAPC recommendation of 10-year (Standard) to 20-year maximum IE 15 year time-frame.</p>	<p>form occurring. Private land developers are actively seeking subdivision approvals throughout the precinct. Refer to the 'Operational period' section of the Council Report for comprehensive justification for the proposed 30-year lifespan.</p>
37 (IN24/2E3D1 A38)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
38 (IN24/2E3FC0 9D)	'Pro-forma submission #1 (Refer verbatim submission 9) attached to submission.	
39	Dear Margaret and councillors,	

SUBMISSION NO.	SUBMISSION	CITY REPSONSE
(IN24/2E689E 5C)	<p>I am writing to you regarding the zoning of the High Wycombe area to residential.</p> <p>This is badly affecting the owners of these properties as we can only sell to developers or the government for a fraction of the price which they are worth.</p> <p>I still believe that this area should have remained special rural as the bush and trees help counteract pollution. If the zoning has to be changed then I believe that light industrial would be a better fit, as the landowners would be able to sell privately and get a much better price for their property.</p> <p>I am now approaching the age of 77 years so am just hoping that I continue in good health to look after my property that I love. I have spent a lot of money maintaining my 2 ½ acres which attracts a lot of birds, bandicoots and reptiles. We bought this property in 1982 and built in 1986.</p> <p>Thank you, Margaret, for your time and attention.</p>	<p>The zoning of DCA2 is beyond the scope of Amendment 113.</p>
40	'Pro-forma submission #2 (Refer verbatim submission 13) attached to submission.	
41	'Pro-forma submission #2 (Refer verbatim submission 13) attached to submission.	