

Attachment 2 – Submission Table

Submitter Number	Comment	City Response
1.	<p>I want to object to the development of the Cambridge Reserve. At the moment there are grass trees, native Christmas trees and other native flora that is on the reserve. I once requested the council if they could cut back/remove the native Christmas tree behind my house as it was causing damage and they said they could not as it is a native Christmas tree but not it is find for the council to bulldoze it completely! We have quendas, snakes, bob tails, gecko's and red tailed black cockatoo's that line in/use the reserve. There are numerous bee hives that also exist in the reserve. What is the councils plan for relocating this vulnerable flora and fauna?</p>	<p>The Concept Design for the Cambridge Reserve project has been informed by a flora and vegetation survey (PGV 2019). The proposed development has been predominantly concentrated in areas where vegetation was recorded as being in a "Completed Degraded" condition. The flora and vegetation survey identified three large areas of vegetation which were determined to be in a "Very Good" to "Excellent" condition, which are a Threatened Ecological Communities (TECs). These areas will be retained, protected and managed. Interface treatments with these areas of vegetation/ TECs will be carefully designed to provide an appropriate buffer to ensure their ongoing viability, in consultation with the Department of Biodiversity, Conservation and Attractions (DBCA). The proposed drainage system will be located within predominantly "Degraded" and Completed Degraded" vegetation and existing cleared land. The proposed drainage system will be vegetated with local native species to create a living stream which enhances the natural environment and maintain or improve water quality.</p> <p>While large areas of habitat will remain intact and protected, the proposed development will necessitate clearing of degraded vegetation which may provide habitat for native fauna. Prior to any clearing works, management of fauna will be determined in consultation with DBCA and may include measures such as:</p> <ol style="list-style-type: none"> 1. slow, directional clearing towards retained vegetation to allow fauna to relocate into adjacent vegetation, supervised by a qualified fauna handler/ zoologist 2. implementation of a fauna relocation management plan, in the event that relocation is determined appropriate (subject to a fauna relocation licence issued by DBCA) 3. pre-clearing inspections for fauna, including but not limited to inspections of any tree hollows during avian breeding season.

<p>2.</p>	<p>My name is ... I have been an advocate for better facilities and services for the elderly and infirm for 20 years.</p> <p>When this initiative was first mooted, I developed a fully comprehensive submission to the City of Kalamunda (then a Shire) on behalf of Lesmurdie & Districts Community Assoc. Inc., a local rate-payers association of note with more than 100 members at the time. I was President of the organisation which fully supported this initiative. The proposal was then lodged with the appropriate government department I understand.</p> <p>That was 4 years ago and there has been very little movement at the station since then from State Government. I therefore welcome the opportunity to keep the proposal up the agenda as it will benefit a large section of the community.</p> <p>It is worth pointing out that although this initiative has a primary aged care focus, it will be of huge benefit to residents as it is a multi-functional in its design and offers a number of sections of the community a series of improvements and upgrades on the site. This will make it a stand-out and unique pocket in the foothills of the city and one which services a multitude of needs.</p> <p>In my original submission, I stated that this proposal was an innovative approach to the aged care crisis in that it included and environmental upgrade as well as the development of facilities for children and families. These objectives still stand and I strongly suggest that this project be given the highest priority by all government agencies involved. I therefore strongly support the proposal and wish the City of Kalamunda well in its delivery.</p>	<p>Support of the proposal is noted.</p>
<p>3.</p>	<p>Death of old growth trees, understory flora and fauna, biodiversity. Increase in temperatures, decrease in oxygen, death of many animals that thrive in this area at the moment. Do not spend my ratepayers \$\$\$ bulldozing this! You currently have a survey in regards to trees on residential property. You worry about a few trees on residential properties yet are willing to bulldoze such a large area for a possible bit</p>	<p>Objection to the proposal is noted.</p> <p>With regard to the impact on existing environmental values, refer to the officer comment for Submission 1.</p>

	<p>of profit? Shame on you. You are all concerned about climate change and what should we do to stop it but you want to bulldoze a natural reserve? Shame on you. Develop this area by planting MORE trees, create MORE diversity, make it a beautiful parkland where people can walk, ride bikes, picnic, nature play for kids instead of allowing another hard surfaced concrete congested heat trap development. Home in the forest, remember that slogan?</p>	<p>Regarding opportunities to for landscape improvements and access, the Concept Plan includes plans to enhance access to natural areas, open spaces and playgrounds at Cambridge Reserve.</p> <p>Any revenue from the Major Land Transaction after all expenses associated with the delivery of the Cambridge Reserve Project, will be used to fund improvement and/or redevelopment of other community facilities in the Forrestfield locale.</p>
4.	<p>I don't agree with selling this land for redevelopment, the natural bush land is far more valuable to us and the native animals that will be displaced.</p>	<p>Objection to the proposal is noted.</p> <p>While large areas of habitat will remain intact and protected, the proposed development will necessitate clearing of degraded vegetation which may provide habitat for native fauna. Prior to any clearing works, management of fauna will be determined in consultation with Department of Biodiversity, Conservation and Attractions and may include measures such as:</p> <ol style="list-style-type: none"> 1. slow, directional clearing towards retained vegetation to allow fauna to relocate into adjacent vegetation, supervised by a qualified fauna handler/ zoologist 2. implementation of a fauna relocation management plan, in the event that relocation is determined appropriate (subject to a fauna relocation licence issued by DBCA) 3. pre-clearing inspections for fauna, including but not limited to inspections of any tree hollows during avian breeding season.
5.	<p>This is an incredibly valuable Cockatoo feeding area. Every precious location counts for birds that will shortly start starving to death. Kalamunda as a region is cherished for its natural beauty. It's a value and culture that everyone who lives here believes in. I strongly object</p>	<p>Objection to the proposal is noted. Refer to the officer comment for Submission 1.</p>
6.	<p>should not be allowed, with black cockatoos visiting the area who in there right mind would clear the area the black cockatoo is in the top 100 of extremely danger of extinction, please do not clear the land for any reason I myself have 29 acres i am leaving it</p>	<p>Objection to the proposal is noted. Refer to the officer comment for Submission 1.</p>

	for any wildlife to visit live etc you have a responsibility to the members of the council area so do not clear	
7.	Please do not destroy yet another piece of natural reserve, that houses numerous animals / species. We are the cause of all natural damage to this planet! The rain so many animals are hitting the extinction list! Please leave this alone.	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
8.	This bush land is used by black cockatoos and other endangered species and is some of the last remaining bush with enough space to maintain biodiversity without major human displacement. Bush has already been lost with road redevelopments and other council projects. This reserve is some of the last remaining bush land in the Forrestfield/high Wycombe area	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
9.	Please leave alone, haven't we lost enough bush areas around Forrestfield? Lived here for 33 years and want this area left alone. I did a bird, bee and butterfly count survey only days ago and we are losing so many birds, bees, butterflies etc due to very reduced feeding areas. There is more beauty in nature than there ever will be in bricks, concrete and paving. Our wildlife needs all the help we can give it, not vandalism of the remaining areas.	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
10.	We object to the removal and redevelopment of the Cambridge st bushland! We want it to remain as a bushland for our flora and fauna as we are losing so much habitats due to all the redevelopment's that is happening so quickly these days ! Thank You ??	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
11.	I object to this proposal. Having bought a house in Kalamunda and having two homes owned by family in Forrestfield I think it is a disgrace you want to clear more land.	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
12.	I am against the degradation of any and all parts of Cambridge Reserve, Forrestfield.	Objection to the proposal is noted. Refer to the officer comment for Submission 1.

13.	Leave the bush for the red tailed black cockatoos and other wildlife	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
14.	The continuing removal of our trees, bush and native underground is against all hope of maintaining a green, natural environment which is why I have lived in the hills for 40 years. The Cockatoos homes are being destroyed as well as many other native fauna and flora. I am ashamed of the Kalamunda shires destruction of bush land, we are no longer a home among the trees. We have industry creeping in, housing estates and so much of our bush land removed. It's time the Kalamunda council thought about how they favour the destruction of our natural environment for the dollar. Shame of you for even allowing it to get this far	<p>Objection to the proposal is noted. Refer to the officer comment for Submission 1.</p> <p>Any revenue from the Major Land Transaction after all expenses associated with the delivery of the Cambridge Reserve Project, will be used to fund improvement and/or redevelopment of other community facilities in the Forrestfield locale.</p>
15.	I do not agree with the proposed development at Cambridge reserve. The natural environment should be left as it is because there are many native wildlife that use the area for food and shelter.	Objection to the proposal is noted. Refer to the officer comment for submission 1.
16.	I do not want to see this piece of bushland replaced with high density development. I am concerned this will negatively affect property value in the area.	<p>Objection to the proposal is noted.</p> <p>The concept plan includes an estimated number of 43 additional residential lots that could be created as part of a future subdivision process. These lots can incorporate a range of lot sizes which enables more diverse housing typologies that will have frontage to public open space. A Structure Plan and design criteria will further inform the proposed density of the future residential lots.</p> <p>The Cambridge Reserve project includes opportunities to enhance access to natural areas, open spaces and playgrounds at the Reserve, improving the amenity for existing residents in the locality.</p>
17.	Leave the reserve alone, it belongs to everyone and not just for the profit of the City.	<p>Objection to the proposal is noted.</p> <p>Any revenue from the Major Land Transaction after all expenses associated with the delivery of the Cambridge Reserve Project, will be used to fund improvement and/or redevelopment of other community facilities in the Forrestfield locale.</p>

18.	This is an objection to destroying a section of Cambridge Reserve. This is an outrageous and two faced exercise. You would destroy beautiful woodland without a thought, whilst obstructing reasonable and conservative development applications. Double standards and all about the \$'s eh?	Objection to the proposal is noted. Refer to the officer comment for Submission 1. Any revenue from the Major Land Transaction after all expenses associated with the delivery of the Cambridge Reserve Project, will be used to fund improvement and/or redevelopment of other community facilities in the Forrestfield locale.
19.	We have little enough natural areas here in Forrestfield and you want to bulldoze one of them to put up housing. There is a large vacant block on Hale rd next to the forum that could fit the seniors housing. Instead you are pushing for this project which will flatten black cockatoo and quenda habitat and significantly lessen the remaining green space we have left. Find another way and leave our remaining bush land alone.	The Objection to the proposal is noted. Refer to the officer comment for Submission 1.
20.	One of the recommendations of the climate change summit is to stop cutting down trees and clearing native areas. This area is environmentally sensitive and should not be cleared.	Objection to the proposal is noted. Refer to the officer comment for Submission 1.
21.	You are such a greedy council. Leave the beautiful bush land and parks alone! Stop trying to bulldoze the land!	Objection to the proposal is noted. Refer to the officer comment for Submission 1. Any revenue from the Major Land Transaction after all expenses associated with the delivery of the Cambridge Reserve Project, will be used to fund improvement and/or redevelopment of other community facilities in the Forrestfield locale.
22. Main Roads	Please be advised that Main Roads has no objections in relation to the above proposal.	Support of the proposal is noted.
23. Public Transport Authority	Thank you for referring the Cambridge Reserve Business Plan and supporting documents to the Public Transport Authority (PTA) for review and comment. The PTA has evaluated the document and provides the following feedback:	Support of the proposal is noted. Consideration of the safe pedestrian crossing, pedestrian refuge and bus stop upgrades will be considered as part of the subdivision and delivery phase of the Project.

	<p>The PTA has no objections to the acquisition of these lots for a future aged care centre. Route 271 is planned to operate along Anderson Rd when the upcoming Airport Line opens, which would provide future residents with a bus service to High Wycombe Station.</p> <p>Ideally, Transperth would prefer the aged care centre abut Anderson Rd, so residents and staff have easy access to Transperth bus services. However, if centre cannot be moved from its proposed location, Transperth is pleased to see that a pedestrian connection is provided for to Anderson Rd. The provision of a safe pedestrian crossing with pedestrian refuge across Anderson Rd should be considered.</p> <p>Transperth also requests the developer to upgrade bus stops 13902 and 13904 to DDA compliance and provide bus shelters for stop number 13902, so residents and staff have some protection from weather elements when waiting for the bus. There may be potential to move these two stops to beer serve the new aged care centre however, impacts to the rest of the area will need to be considered.</p>	
<p>24. Department of Local Government, Sport and Cultural Industries</p>	<p>Thank you for your email. The Department of Local Government, Sport and Cultural Industries appreciates you advising the Department of the City's proposed acquisition of a portion of Reserves 27559, 31348 and 34364, Forrestfield. The Department has no further comment to make in this instance.</p>	<p>Noted.</p>
<p>25.</p>	<p>I regularly visit this area as I volunteer at Kanyana Wildlife, a nearby wildlife rehabilitation and education centre. I have volunteered in both education where I try to spread awareness of the importance of caring for native flora and fauna, and more recently in the rehabilitation team where I see the effects of bushland clearing on the displaced and injured wildlife brought in from car accidents and dog attacks after these animals have been forced to migrate to suburban areas. I am also in my third year of studying a double major in Animal Health and Animal Science with elective units in Australian Biodiversity at Murdoch University and am well aware of the massive threat that habitat</p>	<p>Objection to the proposal is noted. Refer to the officer comment for submission 1 for comments in regards to the clearing of native vegetation and displacement of fauna.</p> <p>Prior to and during the development of a Concept Plan, the City undertook preliminary consultation to obtain feedback from residents regarding the current use and values of the site and most wanted improvements. Further consultation was undertaken during a formal advertising process for the Concept Plan, and Local Planning Scheme No. 104.</p>

	<p>destruction poses to both our ecosystems and the community. The Southwest of WA is a threatened biodiversity hotspot where urban sprawl and clearing of reserves must stop and plans for redevelopment and denser living must be made instead to protect our native flora and fauna and also to allow forests to continue to sequester atmospheric carbon in our aim to slow the progression of global climate change. This area of woodland is home to many native plant and animal species including an important feeding ground for the endangered Carnaby's Cockatoo, vulnerable Baudin's black cockatoo and vulnerable forest red-tailed black cockatoo. This area of forest proposed to be cleared contains 40 year old trees that would be old enough to contain medium sized hollows which are important for the reproduction of birds (such as the ringneck and red capped parrots and migratory sacred kingfishers which come to the Perth region to breed) and homes for invertebrates such as select species of native bees. The displacement of animals may also endanger local people and their pets as many snakes will likely flee the area into nearby backyards and businesses. Another reason not to clear this valuable area of bushland is the ecosystem services it provides for the community in the form of clean air, clean water (as this area is used for storm water drainage and the root systems, soil structure and microflora will filter and clean this water before it runs into the underground water table that nearby bore water systems would then use), cultural value (for locals to appreciate their country and may help local Aboriginal people to feel more connected to their heritage), and finally the woodland is of extreme social value and a place for people to go on peaceful bush walks which is beneficial for both mental and physical wellbeing as well as allowing locals to gain an appreciation for nature and especially the local children to learn about nature and conservation and inspire the next generation to care for their local ecosystems. The planned retirement village will likely be a high quality and expensive home as to cover the loans and interest and eventually make a profit from it's construction. The surrounding area is a lower socio-economic community meaning the local community would not be able to afford to reside in the proposed village and as a result the community would be at a loss from this project as they will be losing many valuable ecosystem services and</p>	
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	<p>a recreation area but will not directly benefit from the facilities built on this land. I implore you to please review this plan again and assess its environmental and social impact in more detail, using current data. Another review should be made on the community's use of this land as from my knowledge the majority of the bushland is not affected very badly by weeds, litter or a place for increased antisocial activity. To get a better idea of the value of the bushland a survey should be made of the local community asking whether they use this bushland and how, what they think of it, and how they feel about the plans to clear it. A more sustainable plan would be to redevelop older and run-down industrial or suburban areas into more dense living spaces to make better use of land that has already been cleared and reduce our environmental impact. The redevelopment of the Claisebrook inlet area from the old East Perth Gasworks and surrounding brickworks, railway yards and scrap yards into the modern urban centre which incorporates natural elements should stand as a positive example for future development plans in Perth and the surrounding regions. We need to focus on sustainability first and do everything within our power to conserve biodiversity and reduce our contribution to global climate change. I hope you consider my comments and review this plan more carefully. Thank you.</p>	
<p>26.</p>	<p>The City of Kalamunda's 'plan' overstates the degraded condition of the woodland, describe it as weed ridden, eroded and a site for higher than normal levels of anti-social activity. This certainly not the case, approximately one fifth of the reserve that is grass and mature trees, the approximately two fifths that contains the reservoir and many 60+ year old trees in heavy clay soil and the remaining two fifths that is composed of the high conservation areas and recovering sandy woodland. Very little erosion of the reservoir has taken place over 40+ years, since it is located in heavy clay soil. There has been some silting up, but it easily accommodated this year's rainfall. The area is remarkably free of rubbish and weeds and shows no signs of antisocial activity. The dense areas of bush show no signs of people walking them or damaging them, all walkers seem to keep to the sandy tracks. The City of Kalamunda also say that Forrestfield has more than the</p>	<p>Objection to the proposal noted.</p> <p>Refer to the officer comment for submission 1 for comments in regards to the clearing of native vegetation and displacement of fauna.</p> <p>With regard to the calculation for open space, The City's Public Open Space (POS) Strategy adopted by Council May 2018 provides an overall POS calculation for Forrestfield. Appendix 4 of the POS Strategy outlines that Forrestfield has 62.77ha of POS which equates to 11.12%. These calculations show Forrestfield will still have 10.5% of POS if the Cambridge Reserve proposed Amendment 104 progresses. This means Forrestfield will still meet the 10% POS requirement in accordance with Development Control Policy 2.3 – Public Open Space in Residential Areas. This data is</p>

	<p>"benchmark" 10% of public open space. However, the data you use of the amount of open space is close to 5 years old. In your own Biodiversity policy it is reported that the rate of clearing in Forrestfield has accelerated over the past 10 years, so using old figures could be highly inaccurate. The Environmental Protection Authority decided not to assess the 'plan' as they deemed the risk to the high conservation woodland can be managed with the right plan..... The reserve is a wonderful natural asset for Forrestfield, and WA. It is continuous with a large remnant of recovering woodland that is protected by virtue of being in a buffer zone for high power electricity transmission lines. The City of Kalamunda are in conflict with their own Biodiversity Policy with this 'plan' which states that any areas of vegetation in Forrestfield that are not grassed with sparse trees should be protected due to the fact it is amongst the most threatened ecosystems on the Swan Coastal Plains. The financial aspect of this 'plan' is worth further consideration. The level of Government with the least amount public scrutiny proposing to make the ratepayers liable for millions of dollars' worth of debt for a large development project in the current economic environment is a risk. The costs of construction materials are increasing at an unprecedented rate, which makes costing projects difficult, even for small construction projects over short timeframes. The COVID pandemic is about to impact the work force and labour costs in Western Australia in ways that are impossible to predict. The City of Kalamunda ratepayers are at risk of being left with less woodland and more debt. This area is a Threatened Ecological Community which various species utilise including endangered black cockatoos, it needs to be protected!!!!</p>	<p>still considered relevant and has not changed significantly since the adoption of the POS Strategy.</p> <p>With regards to the concept plan being referred to the EPA, in accordance with the <i>Planning and Development Act 2005</i>, the City referred the proposal to the EPA. The EPA response received by the City 22 September 2020 outlined a decision that the proposal not be assessed under Part IV of the <i>Environmental Protection Act</i>. The EPA determined that it was not necessary for the proposal to go through a rigorous environmental assessment under Part IV of the EPA act. Whilst the EPA provided no comment, the proposal has been referred to the Department of Water and Environmental Regulation (DWER) and the Department of Biodiversity, Conservation and Attractions (DBCA) for their assessment and comment which the City has taken into consideration in developing the Concept Plan.</p> <p>The comments regarding the financial aspects of the project are noted. Appropriate financial due diligence will be undertaken prior to proceeding with any expenditure associated with the development and landscaping improvements.</p>
27.	<p>Piss off leave it ,, once its gone it will never be replaced ,, we have the best area herte ,, dont go stuffing it up .. there are heaps of other areas to build retirement complex,s</p>	<p>Objection to the proposal noted.</p>
28.	<p>I have enjoyed this reserve, and believe that it should be retained for future generations, and for local biodiversity.</p>	<p>Objection to the proposal noted.</p>

<p>29.</p>	<p>This proposal relates to an unusually large area of neglected land in public ownership that has potential to be developed for community benefit, including for aged person provision. However, the brief given originally to the external consultants and therefore the illustrative proposal put to Councillors was not broad or creative enough in future Development Planning terms and should be further investigated before Council proceeds with this acquisition.</p> <p>The following aspects were not adequately considered and even at this late stage still merit further consideration. –</p> <p>The dire shortage of bed spaces for medically-assisted aged care in this Local Authority area still remains higher than average. Plus there is a relative scarcity of large sites. Such a facility in this location with intelligent multi-storey design could yield <u>over 200 bed spaces</u> as well as <u>associated medical Clinic facilities</u> and a <u>small emergency Ambulance outstation</u> (the latter bearing in mind the major increase in journey time to Midland from the Hills, now being extended by massively increased traffic volumes along Roe and Tonkin highways and the Great Eastern Highway Bypass.</p> <p>Several such multi-storey facilities <u>have recently been designed and being built</u> in various other areas of the Perth Region plus at least two are fully Government funded; and there are many in the Eastern States of Australia, but none considered so far within the City of Kalamunda jurisdiction.</p> <p>While it is has repeatedly proved unrealistic to expect private commercial developers (*as explained below) to consider speculating on that scale of community facility, with an overall ageing demographic profile <u>both State and Federal Governments have policies that suggest they may be prepared to provide capital funds for such a priority purpose.</u></p> <p>*Some Councillors may not be fully aware of the <u>commercial realities</u> of building development for Aged person accommodation – (as follows).</p>	<p>Residential Aged Care has been identified as a significant challenge for the City. Pursuing aged care developments in the City has been a decade long priority and a significant amount of analysis has been undertaken by both the City and through the City's Aged Care Advisory Committee. The City of Kalamunda contains a gap between the needs of the community and aged care beds available - an estimated shortfall of approximately 750 aged care beds by 2036. In addition, the aging population in Forrestfield is slightly higher than the Perth Metropolitan Region average.</p> <p>The comments regarding the aged care development sector are noted. The advice guiding the City's approach to encouraging aged care development, is to not directly undertake aged care development, but rather use government assets (including State Government land) to encourage retirement living and aged care developments, and prioritise sites close to existing amenities (shops, public transport) which also helps to address the social isolation that some residents have with retirement villages that are suitable for a ground lease to a retirement/aged care operator.</p> <p>It is proposed that the City will undertake an Expression of Interest (EOI) process over the site calling for the aged care providers to submit concept designs for the Cambridge Reserve site. A range of development forms and aged care models could be considered in this context. The EOI process will seek to require industry to align with the vision for the Cambridge Reserve Project and provide supporting documentation.</p>
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Lack of such appreciation has delayed provision of a wide enough spectrum within this Local Authority, due in large part to excessive emphasis on planning for multiple retirement unit 'villages', accompanied by vague use of the term 'integrated' aged care and thus a long quest for large sites. Those commercial realities despite idealistic thinking on the part of both community and Council have over the past 5 years have led the Council to support planning of projects that have still not commenced e.g. Heidelberg Park, Carmel and Gavour Road in Wattle Grove.

The usual business model of commercial property developers is very short term on-site engagement. i.e. Cleared unobstructed sites simple to subdivide, simplicity of providing road access, drainage and street lighting. Then rapid sale or lease of subdivided blocks and/or partially subcontracted home and land packages. All without any over-hanging future commitment of any kind.

However, the inclusion of medically assisted facilities (e.g.' integrated aged care') introduces an over-hanging commitment to provide other (medical and nursing) services not normally provided in their business model, that specifically involve a long-term commitment, that is furthermore not easily enumerated in terms of demand or reliably costed at the outset.

Consequently, Local Authorities seeking more than basic over 50's 'retirement' village provision for aged persons have inevitably found that commercial developers will always seek to minimise, or defer indefinitely, any medically assisted element in Planning Approvals. That is almost certain to occur again with this latest proposal as presented to this Council in the form of a Business Plan that simply secures Local Authority acquisition of land to then dispose of to commercial developers who will inevitably prefer to build single storey units in a form that already exists in the immediate locality.

(A very small number of developers specialise in aged-provision; e.g. those with charitable connections; or with substantially higher end-point sale pricing; or complex exit arrangements financially unattractive to many families.) But such complex arrangements are more suitable for privately-owned land than appropriate for Local Authority 'divestment'.)

Against that commercial reality responsible Local Authorities must therefore seek external funding for any medically-assisted provision in order to secure certain provision of an adequate spectrum of aged accommodation. (Particularly where population density is increasing, as is the case in the Forrestfield/ High Wycombe localities.)

Concerning existing features of this Cambridge Reserve site, those were explained in the external Consultant's report that formed the initial part of their proposals and all Councillors are presumed to have walked the site, over the several years that development has been considered.

Apart from extensive tree cover in parts; and one area of protected natural biodiversity, massive seasonal changes occur, particularly with the peripheral rainwater scouring at the rear of residences on the south boundary and the large lake that forms as a natural drainage 'sump' then progressively dries out annually. With intelligent changes in land profile and drainage management, some of that water could be stored and retained for site reticulation and the steeply inclined peripheral edge of the existing 'sump' re-profiled to form part of a most attractive landscaped setting. However, the cost of such major Civil Engineering works should not be borne by the Local Authority (ratepayers).

Also, with the extent of peripheral tall vegetation offering screening from overlooking of existing private residences this would in many ways be an ideal site for a multi-storey (medically assisted) aged care unit in an attractive landscaped setting that is urgently needed within this Local Authority jurisdiction. Several of the 'intergenerational' community facilities illustrated in the initial Consultants report could usefully be

	<p>incorporated as well as number of small aged 'partner' homes, (but not directly behind surrounding existing residences without vegetated buffering.)</p> <p>It is suggested <u>that before giving any further consideration to the proposal for the City of Kalamunda to acquire the land specified</u>, that both State and Federal Government Agencies be formally approached for capital funding for a multi-storey 200 plus medically-assisted bed space building on this 'Cambridge Reserve' site.</p>	
<p>30.</p>	<p>Environmentally this plan is in contradiction with CoK own biodiversity policy which states any woodland in Forrestfield which is more than a few trees in lawn needs to be protected. This plan will see recovering woodland gone and high conservation woodland whittled away and encroached on. This reserve should not be broken up. The financial aspect is also risky in the current environment of spiraling costs for materials, and covid infections about to be let into the community, potentially leaving the rate payers with years of debt.</p>	<p>The comment regarding the need to prioritise biodiversity in Forrestfield is noted. The strategic level assessment of natural areas will assist the City to identify natural areas that should be formally protected and managed in the long term, including the Threatened Ecological Communities (TECs) at Cambridge Reserve.</p> <p>Any decisions regarding land use change and protection of environmental values are to be based on field assessments to confirm the indicative biodiversity values. This has been undertaken as part of the Cambridge Reserve Project with a flora and vegetation survey (PGV 2019).</p> <p>The proposed development has been predominantly concentrated in areas where vegetation was recorded as being in a "Completed Degraded" condition. The flora and vegetation survey identified three large areas of vegetation which were determined to be in a "Very Good" to "Excellent" condition, which are a TECs. These areas will be retained, protected and managed. Interface treatments with these areas of vegetation/ TECs will be carefully designed to provide an appropriate buffer to ensure their ongoing viability, in consultation with the Department of Biodiversity, Conservation and Attractions (DBCA).</p> <p>The comments regarding the financial aspects of the project are noted. Appropriate financial due diligence will be undertaken prior to proceeding with any expenditure associated with the development and landscaping improvements.</p>

<p>31.</p>	<p>I feel we need to preserve the bushland that is left. With this proposed Nursing Home and Lifestyle Village our population in Forrestfield is going to be detrimental to our environment especially with already established land being subdivided this is going to just add extra strain on our facilities. I walk through this gorgeous piece of bushland as the sun is starting to set and the Redtail Black Cockatoos are landing near the rain water reservoir and drinking the water. I have videos of them drinking. I know that it is only there in winter but I feel we should be encouraging our endangered species. They will never come down and drink if it is built up with so many people. In my opinion we should leave the bush that is remaining in Forrestfield alone. I moved here 24 years ago because I loved the bush and the rural feel of Forrestfield.</p>	<p>Objection to the proposal is noted. Refer to the officer comment for submission 1.</p>
<p>32.</p>	<p>This submission is on behalf of Nature Reserves Preservation Group (NRPG) Inc. The length and complexity of this project has made making a submission somewhat confusing. Given its convoluted history, involving many diagrams and maps of proposals, this submission will refer only to the maps and diagrams used within this business plan. Reference will, however, be made to our submission (14 August 2018), on the Cambridge Reserve Landscape Concept Plan.</p> <p><i>As stated in that submission, "...the main concern of NRPG is the retention and management of as much native vegetation as possible. We maintain the starting point for any development should be the existing natural assets of the location. Once these have been established, by comprehensive environmental assessments, the development should be designed around these assets."</i></p> <p>We would now emphasise the importance of areas other than those of high conservation value. Such areas, once rehabilitated, can serve as environmental buffers, wildlife corridors and linkages. They also help to provide a 'sense of place' and, by their creation, are cheaper to maintain than manicured parks and lawns.</p> <p>For ease of reading, extracts from the Business Plan Report will be italicised, followed by 'boxed' NRPG comments.</p>	<p><i>Fencing of Threatened Ecological Communities:</i> The comments on the fencing type and the need for ongoing maintenance are noted. The design of fencing will be through the preparation of detailed landscaping plans. Ongoing maintenance will be a relevant consideration as part of future asset maintenance budgets.</p> <p><i>3m Limestone Track:</i> The need to consider the risk of dieback when determining the appropriate materials for use in this track, is noted.</p> <p><i>Threatened Ecological Communities Buffer and Fire Hazard Reduction:</i> There is a need to ensure that the final landscape plans for improvements to Cambridge Reserve appropriately protects the TEC, while also allowing for a recreational function and maintaining the buffer so as to minimise bushfire risk. An Environmental Management Strategy (2020) provides recommendation on the bushfire management considerations within the buffer areas. These principles will inform the preparation of detailed landscaping plans.</p> <p><i>Consultation:</i> Significant consultation has been undertaken in the preparation of Concept Plans for Cambridge Reserve. The next phase of the planning</p>

	<p>Although the financial implications of this transaction are of interest, on which brief comment will be made, the focus of the submission will be on the following section:</p> <p>Section 3. Cambridge Reserve Community Enhancement Project. <i>a) Flora Survey and Floristic Community Type Analysis;</i> <i>b) Preliminary Environmental Management Plan;</i> <i>c) Geotechnical Report;</i> <i>d) Water Modelling and Local Water Management Strategy;</i> <i>e) Bushfire Management Plan;</i></p> <p>In turn, the survey has resulted in the “Retention and protection of three areas of Threatened Ecological Communities”.</p>	<p>process will incorporate the preparation of a Structure Plan, which will include community consultation.</p> <p><i>Lighting:</i> The comments regarding lighting levels are noted. This will generally not be a matter that is subject to public advertising, however the impacts on wildlife will be a consideration when finalising detailed landscaping plans for the reserve.</p> <p><i>Extent and Nature of Revegetation:</i> The suggestion to simplify the use of terms “native” and “endemic” is noted. This will be considered in future phases of the project.</p>
	<p>It is encouraging to hope our 2018 submission requests for environmental studies encouraged the production of some of the above. Whilst the above are pleasing to see, sections of the Landscape Concept Plan legend/notes tables, leave room for concern. Given that much of the rest of the Business Plan Report may be subject to change (see later remarks), we trust there will be an opportunity for further public comment, before the ‘concept’ becomes an active development.</p>	<p>The City’s Environmental and Planning staff were involved throughout the planning phases of the Cambridge Reserve Project. Any future landscape design process will have input from all relevant internal service areas at the City.</p> <p><i>Parking areas:</i> The notes regarding parking on the Concept Plan area appropriate for the level of concept of planning undertaken. It is not anticipated parking will encroach within any TEC or buffer areas.</p>
	<p>Items of concern: Figure 5. Legend. 1. <i>Fenced Threatened Ecological Communities (TEC)</i></p>	<p><i>Revenue from the Project:</i> The recommendation to utilise revenue on meeting the City’s objectives under Clean and Green is noted. The use of any revenue will need to be determined having regard to the range of strategic priorities in this locality.</p>
	<p>To guarantee adequate protection of the biodiversity in such areas, careful consideration of the type of fencing to be used, is essential. Care must be taken to ensure ecological linkages are maintained and fauna are still able to use wildlife corridors and linkages after fencing is installed. The City has the experience to ensure this is carried out correctly. It will then be vital that the City ensures it provides ongoing budget allocations for the care and maintenance of such fencing, perhaps set aside from the estimated \$4.5m net revenue from the transaction.</p>	<p><i>Formal Protection through the Planning Process:</i> In the context of finalising the draft Local Biodiversity Strategy, Local Planning Strategy and the preparation of a new Local Planning Scheme, consideration will be given to the creation of a new local reserve designation for Conservation. Subject to the Council’s adoption in this regard, this may provide for formal recognition of conservation value vegetation within local reserves.</p>
	<p>2. <i>Bush Re-vegetation</i></p>	

See comments on Note 4, below.	The recommended principle to incorporate “Environment in all Policies” is noted and aligns with the City’s strategic objective to “protect and enhance the environmental values of the City”.
<p style="text-align: center;"><i>3. 3m Limestone Maintenance Track</i></p>	
<p>Whilst the use of limestone for such constructions is widely accepted, construction should ensure careful attention is given to avoiding any possibility of dieback (Phytophthora) pathogens becoming established. Several years ago, ‘cracker dust’ was being tested to assess its dieback resistance. There may now be other dieback-resistant materials available and local to this area.</p>	
<p style="text-align: center;"><i>14. (TEC) zone</i></p>	
<p>The satisfaction from seeing these zones defined on the concept plan is severely tempered by concerns over how such communities will be protected. For their adequate protection, there is a requirement for the establishment of ‘buffer zones’. Whilst such zones appear on some diagrams, given the number of diagrams present in the draft, the extent of these is unclear. Are the areas designated ‘5. Bush re-vegetation areas’, intended to be these buffers? Unless such buffers are adequate, outer boundaries of TEC zones will come under threat from dangers including weed ingress.</p>	
<p style="text-align: center;"><i>15. Fire Hazard Reduction Zone</i></p>	
<p>Always a difficult zoning, its creation should, within the restrictions of State Planning Policy 3.7, and its guidelines, attempt to retain as much native vegetation as possible. Options other than reducing the fuel loads should first be explored, despite such options adding to the costs of the development. Clearing of the native vegetation should not be the initial default design.</p>	
<p>Figure 5. Notes. <i>1. Concept is indicative only and subject to detailed design.</i></p>	
<p>Whilst it is accepted that, at later design stages, changes will be required, it is essential public comment be sought on all such changes before the project is finalised.</p>	

	<p><i>1. Extent of lighting is to be determined during detailed design.</i></p> <p>Once detailed design has determined the lighting extent and levels, public comment should be invited. Lighting levels should be reduced to the safe minimum in and around the areas of native vegetation serving as habitat for native fauna. The National Light Pollution Guidelines for Wildlife should be followed. Ref. https://www.awe.gov.au/environment/biodiversity/publications/national-light-pollution-guidelines-wildlife</p> <p><i>4. Re-vegetation is to be carried out using endemic and/or native species.</i></p> <p>Long-term funding will be essential for any revegetation projects. Adequate funding for preparatory and ongoing weed suppression should also be part of this. The comment <i>“revegetation is to be carried out using endemic and/or native species”</i> needs clarification. We would suggest the term <i>“endemic species”</i> or simply <i>“native endemic species”</i> be used.</p> <p><i>5. Extent of all re-vegetation works are subject to bushfire assessment and requirements.</i></p> <p>Consideration of the bushfire assessment and requirements should be conducted in a way that is sensitive to the importance of native vegetation to flora and fauna. Solutions should not simply be the cheapest and most convenient options. Close liaison with the City's environmental staff is essential in this stage of any development.</p> <p><i>8. Parking locations and quantities are indicative only and subject to technical advice.</i></p> <p>This simple statement gives great cause for concern. Past experience suggests that the initial requirements for parking locations and quantities are invariably underestimated. Ensuing increases in parking areas inevitably result in further losses of vegetation. All parking bay designs must comply with an appropriate tree to bay ratio. City of Kalamunda draft LPS 33- Tree protection (5.3.4 Design of car parking</p>	
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	<p>spaces, 'Deemed-to comply' requirement C4.3) proposes using "...one shade tree between each four external car parking spaces." Using suitable native trees, this would be a good starting point for this current proposal. Every demand for extra parking locations or extent, should be challenged, with developers required to provide a strong case for any such increases or variations.</p>	
	<p><i>9. TEC areas will be subject to rehabilitation/re-vegetation as part of public open space upgrades.</i></p>	
	<p>Given our reservations over the environmental validity of the City's Public Open Space Strategy, outlined in our submission of March 2018, we request that these be taken into consideration here. The City should ensure that any <i>rehabilitation/re-vegetation</i> should be under the control of Environmental, rather than Planning staff or at least, close coordination between the two sections is guaranteed.</p>	
	<p><i>Section 4. Proposed Acquisition and Future Development.</i></p> <p><i>"The net revenue to the City is estimated to be approximately \$4.5m."</i></p>	
	<p>This estimated net revenue presents a unique opportunity for the City to use some of this to guarantee protection of the retained environmental assets of the site. Serious consideration should be given to the purchase of other bushland areas for conservation purposes. Such an initiative would help to offset the continuing loss of bushland and improve the likelihood of the City achieving its Clean and Green objectives. Whilst it is acknowledged there will be competing claims on this revenue, failure to make use of a realistic portion of this revenue in the service of the natural environment, will make it difficult for Clean and Green objectives 2.1 and 2.1.4, to be achieved (see also comments at <i>Figure 3 Legend (TEC)</i>, above).</p>	
	<p><i>Section 5.4 Expected effect on matters referred to in the local government's plan prepared under section 5.56</i> <i>Priority 2 – Kalamunda Clean and Green</i></p>	

	<p><i>“Objective 2.1 To protect and enhance the environmental values of the city”</i></p> <p><i>“Strategy 2.1.4 Increasing and protecting local biodiversity and conservation, wherever possible, through integrating ecosystem and biodiversity protection into planning processes including schemes, policies and strategies.”</i></p>	
	<p>Given the exponentially-increasing threats to native vegetation and the recent State Draft Native Vegetation Policy direction, the above Objective and Strategy should be at the forefront of any future thinking by the City. Failure to do so may result in losses of native vegetation values which could have been avoided. Related to these threats, could the City explore rezoning land retained as vegetation, as single large blocks vested as Conservation Flora and Fauna and Recreation? We would appreciate this being explored.</p>	
	<p>Conclusion.</p> <p>Complex and lengthy as the history of this project has been, the frequent changes and developments within it have been encouraging signs. They may be seen as evidence of the City's acknowledgement of the community's love of and concern for the environmental values of the hills, foothills and coastal plain. The changes also reflect continuing efforts by the City to provide adequate and suitable aged care facilities. There are still concerns that the wide-ranging aims of this business plan, in its efforts to satisfy many conflicting needs, may prove difficult to achieve.</p> <p>Unfortunately, having the <i>“rehabilitation and re-vegetation”</i> of TEC areas, as part of Public Open Space upgrades (Fig. 5 note 9), gives great cause for concern, based purely on the complex nature of such assessments and, the apparent absence of environmental staff input to the process. It is unacceptable to have the Department of Sport and Recreation and the Planning Institute of Australia WA, advising the City, through the Public Planning and Design Guide WA and State Public Parklands Strategy.</p>	

	<p>Inevitably, whilst within the various POS/Parklands guidelines, there is some consideration for the retention and enhancement of environmental values, the major thrust and detail within those documents relates to the provision of sport and active recreation facilities. It is the Planning section which is charged with reviewing its Public Open Space Strategy at designated times. The next review should ensure a principle of “Environment in all Policies” is followed in future POS reviews (see NRPG 2021 submission on the City's draft Local Biodiversity Strategy (p. 3).</p> <p>The City staff are to be commended for their preparedness to ensure vital processes such as those requested in our 2018 submission, were carried out. The environmental surveys carried out and actions taken on the results of those surveys, reflect well on staff and this should be acknowledged.</p> <p>NRPG appreciates the opportunity to make comment on this complex proposal and trusts future opportunities for public input will be invited at later stages of any development.</p>	
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