

**Proposed Scheme Amendment No. 106 – Kalamunda Activity Centre Plan**  
**Proposed Local Planning Policy 30 – Built Form Design Guidelines**  
**Submission Table**

Submitter	Submission	Officer Comments
1.	<p><b>Objection</b>                      Kalamunda has become increasingly noisy over the past few years. This won't help matters...it was a country feel community, it is being destroyed!</p>	<p>Noted. The Kalamunda Activity Centre Plan (KACP) seeks to provide greater opportunity in activating key parts of the town centre as a functional and cohesive precinct, as contemplated for in a variety of State and local planning documents.</p> <p>The KACP acknowledges the historical character of the townsite and its surroundings, identifying design requirements to be considered as part of any future development proposal.</p>
2.	<p><b>Objection</b></p> <ol style="list-style-type: none"> <li>1. The Activity Centre Plan for Kalamunda produced at very high cost to Ratepayers (\$350,000?) in 2019/20 by external consultants was unrealistic then and the primary errors made then have not been addressed in this set of legal amendments to supposedly guide future planning. They are based on a false assumption of forecast growth in land value in the Town Centre when the reverse is the likely case for a variety of practical reasons.-These are mainly associated with major social and macro-economic changes lowering retail profitability; extremely limited safe public access and egress walkability for elderly residents, who are by far the most numerous weekday daytime users of this 'Activity Centre' and whose homes are concentrated around this Town Centre. The decline in local retail profitability is glaringly obvious and off-putting to any potential commercial property investor; with empty unlet buildings and sections of buildings in every part of the Centra as depicted in the mapping. Community users made copious input on these (including by Petition to Council e.g over 230 signatures from registered Ratepayers living around the Town Centre requesting safer walkability access. Also, the highly predictable traffic and parking chaos in Barber Street continues around the Post Office; that since several Banks have closed local branches in Kalamunda has become Agents for most of them, with substantially increased business. (Note also: The narrow direct entry from Canning Road is used extensively by Post Office staff and local citizens.) Most of the above have already been the subject of written input and deputations so there seems little point now of repeating them now.....                      However, over the intervening period since 2020 most Development has ceased as a result of an international pandemic intervening on what were thought to be predictabilities about our collective futures.-</li> <li>2. Planning Systems will be obliged to respond to these with a progressively changed mind-set and increased adaptability. CoK Planning systems must therefore not only be fully mindful of these vital facts, but also ensure that they are reflected in this proposed Policy for Activity Centres</li> <li>3. The WAPC guidelines read as being highly prescriptive, but ignore the contemporary primacy of future uncertainty and future change.</li> <li>4. Unpredictability and accelerating change affects both users and service providers of all kinds and must be more seriously taken into account in future Planning of urban ACTIVITY CENTRES since those are the FUTURE focus of community assembly and activity at many different scales.</li> </ol>	<p>Noted. A number of assumptions and scenarios were provided in the preparation of the KACP, based on the most current data and population projections. The Kalamunda Activity Centre Plan (KACP) will be effective for essentially 10 years. It seeks to facilitate the rezoning of land to encourage existing housing stock to be redeveloped through the application of density codes, whilst supporting the growing demand for retail services, over the lifespan of the KACP.</p> <p>The effects of the Covid Pandemic is not yet known and will not be fully known for some time. It is anticipated that a review of the KACP will commence after 5 years of operation. In the meantime, the report has been prepared to support the uniform rezoning of land within the Kalamunda town centre to allow the Activity Centre Plan to guide the development requirements in a progressive manner.</p> <p>The WAPC guidelines provide a framework for which Activity Centre Plans are to have consideration. The technical input is informed through assumptions based on current trends, taken from local and national examples.</p> <p>Noted. The KACP report has considered the capacity of current and future service provisions from each of the public utilities providers based on the development scenarios, further detailed assessments are required as and when demand for the additional services are required.</p>

	<p>5. The following are examples of recent major change- The complex Covid-19 novel coronavirus has no known precedent and epidemiologists have no way of knowing with certainty to what extent it may mutate and recycle its damaging effects on humans over time. Futures Planning – The CoK Planning System is of course intended to respond to future community needs. Communities are however currently beset by increasing change and unpredictability. The recent complex experiences and shock of a world-wide pandemic, combined with accelerating climate change must not be regarded as temporary phenomena, but on-going into the future; and must therefore be reflected in a conceptual framework and Guidelines for future community Activity Centres. Change to high levels of unpredictability. – We now know that recent experiences are not merely a temporary glitch in human evolutionary behaviour but are evidence of increasing unpredictability. That represent a new ‘normal’ to which the user-community will need to adapt for long- term ‘survival.’ Planning Systems need to lead in demonstrating and achieving that adaptability. Future Planning concepts and methodologies are being drastically re-assessed world -wide simply because major and unexpected changes not only affect user communities, but also the ‘traditional’ relationships and organisational structures. Development of new vaccines may result in protections for some, even a majority, but on a world-scale humans do exist in an enormous range of different socio-physical circumstances; (and also seem to be increasingly incapable of long-term peaceful coexistence!) Since nea- term total eradication of coronavirus seems unlikely, the de-stabilising effect of continuous testing, tracking and containment seems likely to be a feature of living in advanced civilisations. More so with Australia being a multi-cultural, internationally trading community with continuing exposure world-wide. Also, for many, working from home is becoming a new normal. Furthermore, there is extensive factual information locally and a widespread consensus both regionally and world-wide, that climate-change is accelerating and the extensive heat-island effect is most prevalent in built-up urban areas. Most changes hitherto have been modest and able to be gradually infused into our multiple patterns of living and working, (but none are comparable with the sudden material impact of an unknown virulent pandemic affecting everyone almost everywhere irrespective of personal intellect, wealth or social status; or the changing climatic conditions in urban areas to which forward planning systems have been too slow to react. Evidence from the past suggests that we may hope, with an underlying sense of denial, that sudden unexpected change is temporary. However, we must recognise that this pandemic; and other recently highlighted threats related to climate change are not only local but world-wide; and ramifications now so complex and unexpected that we will be wise to adopt a different mindset. Need for changed mind-set. - That changed mindset will involve preparing ourselves and the Planning Systems we have depended upon, for other sudden unexpected changes in future; and above all to fundamentally enhance our adaptability, both personally and collectively. A brief glimpse of reality today. - Many successful entrepreneurs have previously experienced setbacks in growing their businesses or services, albeit in a much more predictable environment. However, now with variable and suddenly shrinking custom, they not only have responsibilities to employees they cannot retain but face wide-ranging financial uncertainties threatening their economic survival as well as on-going risks of their remaining workforce being threatened when coronavirus mutations appear locally, unless and until vaccines eventually emerge that everyone will accept. Both employers and individuals have realised that the most useful aspect of enhancing adaptability is flexibility of mind-set and re-skilling. In many cases being prepared to pivot around existing service delivery behaviour in current occupations or contemplate a complete change of occupation. Consequences. -The WAPC Guidelines for Activity Centres completely ignore the above realities and advise Activity Centre planning to be on the basis of a10 year forward time frame. That is obviously unrealistic since known, anticipated and unpredictable changes affecting both urban communities and services provided to them in Activity Centres must be researched continuously and the collective skills required to design and plan for them assembled at initial Planning stage, not left to chance. For example. - Future Activity Centres in terms of scale, economic viability and access are subject to a much higher level of unpredictability than hitherto, reflecting the multiple change forces to which communities and businesses will henceforth be exposed. Businesses of all types face dynamic, constantly changing operational environments; including demand and supply, transport, and technological facilitation, as well as ever- present competition to retain local market share. Numerous changes including on-line marketing, purchasing and transportation, are altering ‘gravitational’ customer competition between Activity Centres meaning that flexibilities must be planned-for, not ignored as they are in WAPC Guidelines. Conceptual location, form and Structure Planning of Activity Centre requires * Feasible capital and on-going investment</p>	<p>Noted. The preparation of the KACP has considered the State’s planning framework and is considered to be an adaptable document that will guide decision making in the context of various economic and global impacts.</p>
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	<p>determining what to build, where and why. * collective economic locational viability, * on-going Community analysis and preferred inclusions * collating local Community insights (in existing centres) * Forecasting size, scale and delineation of included spaces * Spatial form and relationship between buildings * creating useful and attractive spaces avoiding heat island effects *Convenience for users, public safety, mixing of types of uses, and 'proximity' management * Movement of people and parking of private vehicles and timing of commercial vehicle access. *Essential pedestrian signalled priority safe walkable access into and out of Activity Centres. LGAs faced with an inadequate range of in-house skills have typically taken refuge in engaging external consultants, at high cost) then from virtually a zero base briefing those consultants, that in turn are still highly unlikely to be able to investigate and interpret complex and changing local dynamics. (As in some Activity Centre proposals, that ignored essential access were submitted by L/A Councils to WAPC in late March 2020, when stakeholder community were effectively excluded from comment by the initial Covid lockdowns). Planning Failures with different types and locations of Activity Centres - LGAs Attempting to designate existing community focus localities as 'Activity Centres' will most usually encounter the difficulty that such developments have been allowed to grow either side of existing primary access roads and railways. (i.e., Typical of 'Ribbon development' that was recognised and deliberately forbidden by Planning Systems as long ago for example as in the 1960s in UK and Europe). – Because this led in a 'chain-reaction' to inefficient and inadequately serviceable Urban Sprawl (E.g. exactly what is being allowed to develop in WA south of Perth along the Mitchel Fwy and Forrest Hwy!) in those early overseas cases land between them was deliberately reserves as Green Belt, but not yet in WA! Further to that risk, there are numerous cases in WA where primary access roads or railways travel along one side of evolving District Centres and seriously limit or even prevent safe pedestrian walkability and cycle access from that side. One recent example is Canning Road of Kalamunda (that is downward -sloping from the Dome Café to Heath Road with often dense traffic moving at around 60kph.This Road that forms one side of the Kalamunda Town Centre must be negotiated without safe walkable crossings by mostly elderly occupants of some 60 home units. (Now attracted more intensely by the restoration of Jack Healey Centre as an elderly persons community Hub.</p>	
3.	<p><b>Comment</b> It has come to my notice that the City of Kalamunda needs one more zebra crossing like the one on Canning Road near Haynes Street. I would like to suggest near Meade Street. During the week I have noticed a lot of senior people out and about walking. At this crossing it would be desirable to have traffic slowed down to no more than 40kms an hour or slower. No doubt a lot of councillors will smirk at this idea. However seniors do not walk or move as fast, as younger ones. The Jack Healey Centre appears to be used quite often and people crossing Canning Road sometimes have to wait quite a long time. I wish you well for the new Plan.</p>	<p>Noted.</p> <p>Reference should be made to the KACP, specifically Figure 5 of Part 1 of the report, which identifies the general location of key pedestrian crossing points. The location is generally consistent with the that suggested in the submission.</p> <p>Application to reduce speed limits are made to Main Roads WA. The City will need to investigate the benefit and need for reduced speed limits as the Kalamunda Town Centre develops.</p>
4. Department of Communities	<p><b>Support</b> Thank you for the opportunity to provide comments on the Kalamunda Activity Centre Plan (KACP) the associated amendment to Local Planning Scheme No 3 and Draft Local Planning Policy. The Department of Communities (the department ) in principle supports the City's planning for future development in the Activity Centre area and wish to put forward the following:</p> <p><b>1. Activity Centre Plan : Communities' land assets:</b> Lot 608 (6) Dixon Road, Kalamunda, currently registered with the State Housing Commission, is a significant land asset that will be transferred to DevelopmentWA in terms of the Machinery of Government land asset management process. The KACP proposals recognises the significant vegetation on the site and recommends the retainment of a part of the site for open space, whilst the remainder of the site has been set aside for medium/high density. The department in principle supports the R60 residential designation as it creates an opportunity for the delivery of dwellings that could provide alternatives to the predominantly single dwellings in the area.</p> <p><b>2. KACP Built Form Design Guidelines : 6.2 Universal Design:</b></p>	<p>Noted.</p>

	<p>The draft sets an objective for new developments within the KACP to consider people of all abilities, with a specific requirement for 50% ground floor dwellings to be designed to achieve a silver status Liveable Housing Design Criteria. ABS data for the local authority area indicates that the population of the City of Kalamunda is aging at a rate higher than the average for Western Australia. The department would strongly suggest that consideration be given to increase this requirement to 70% of new dwellings to consider not only future growth, but also gaps in the supply that may exist.</p> <p>It is further strongly suggested that, the requirement for slope of building access to consider universal design guidelines, be extended to the public realm in its entirety and that it be designed with a view to consider the requirements of people of all abilities and ages.</p> <p><b>3. KACP Built Form Design Guidelines: 6.7 Development Incentives:</b> It is recognised that, to encourage exemplary design outcomes, the City of Kalamunda is offering a range of development incentives. These incentives are discretionary and subject to agreement with the City. In all cases, development bonuses or relaxation of requirements are based on achieving an outstanding contextual design outcome. These incentives are positive.</p> <p>The department would also encourage the city to consider opportunities to deliver housing outcomes that will deliver a range of housing types. To this end it is suggested that consideration be given to provide bonuses for the delivery of dwelling outcomes suitable to accommodate single and aged households in addition to the identified elements.</p> <p>The department supports the inclusion of affordable housing as an incentive for density bonuses. The city is encouraged to work with the Department of Communities to define affordability thresholds if and when required.</p>	
5. Department of Education	<p><b>Support</b> The Department wishes to advise that it offers no in principle objections to Amendment No. 106 or draft LPP30. The proposals are unlikely to have a material impact on the delivery of the educational needs for the area.</p>	Noted.
6. Department of Fire and Emergency Services	<p><b>Comment</b> It is unclear from the documentation provided if the City of Kalamunda (City) has applied State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP 3.7) to this proposal.</p> <p>Given the Local Planning Scheme (LSP) seeks to rationalise the boundary of the Kalamunda Activity Centre and modify the existing uses within the centre, the LSP provides an opportune mechanism for the coordination of bushfire risk to ensure that it does not result in the introduction or intensification of development or land use in an area that has or will, on completion, have an extreme BHL and/or BAL-40 or BAL-FZ.</p> <p>SPP 3.7 seeks to reduce vulnerability to bushfire through the identification and consideration of bushfire risks in decision-making at all stages of the planning and development process.</p> <p>A Bushfire Management Plan (BMP) is required to accompany strategic planning proposals, subdivision and development applications in areas above BAL-LOW or areas with a bushfire hazard level above low (refer to clause 6.2b). A BMP includes the bushfire assessment, identification of the bushfire hazard issues arising from the relevant assessment and a clear demonstration that compliance with the bushfire protection criteria contained within Appendix 4 of the Guidelines, is or can be achieved.</p> <p>The BMP should be prepared as early as possible in the planning process and progressively refined or reviewed as the level of detail increases. The level of detail provided within a BMP should be commensurate with the applicable planning stage and scale of the proposal or application.</p>	<p>Noted.</p> <p>The proposed Scheme Amendment does not materially change the existing land uses, instead provides for more flexible zoning to allow for intensification of development on a per lot basis. It will be a requirement for each development proposal to address their individual bushfire planning and threat level at the subsequent stages of planning (development or subdivision).</p> <p>A Bushfire Management Plan was prepared with the draft Kalamunda Activity Centre Plan as Appendix C to which this Scheme Amendment applies.</p>

	<p>Should you apply SPP 3.7 then, we request the relevant information pursuant to this policy be forwarded to DFES to allow us to review and provide comment prior to the City endorsement of the LSP.</p>	
<p>7. Water Corporation</p>	<p><b>Comment</b></p> <p>1. Wastewater The Water Corporations planning, based on the Kalamunda Activity Centre Plan (KACP) Map (as per Figure 5 of the proposed Amendment No. 106) indicates that the Corporations existing sewerage network; within the ACP area and further downstream, has capacity for the proposed increase in wastewater flows.</p> <p>Area of note is the portion of un-serviced land north of the town centre, which is located within the physical gravity catchment of a proposed future wastewater pump station (“B”); to be located in Stirk Park. The establishment of the pump station and associated works to serve development in this area will be customer funded until such time as the project is scheduled on the Capital Program.</p> <p>Should the City adopt a final version of the KACP which allows for higher densities, the Corporation requests opportunity to review the network planning in more detail to reflect any changes to the plan. Any increases in yield beyond what is indicated so far are likely to drive the need for some upgrades to some sections of the sewerage system downstream. The modelling so far has shown that the worst affected sections of gravity sewer are 150mm and 225mm diameter “reticulation” sewers.</p> <p>Upgrades to the Corporations reticulation network are customer funded and delivered.</p> <p>2. Water Consistent with the Engineering Servicing report produced by JDSI (JDS171397 Feb 2019), the Corporation has a well-established reticulated water network in the KACP area.</p> <p>The majority of the network is comprised of size DN100 and DN150 pipes, which are suited for lower density areas.</p> <p>Given the flexibility allowed by the proposed zoning, there is not enough detail to model the potential impacts to the existing network.</p> <p>It is likely that the level of service available from the DN100/150 pipes will not be sufficient for high density development and that requiring fire services.</p> <p>As the water demand information is provided, via development applications, the Corporation will be able to assess upgrade requirements. Upgrades to the Corporations reticulation network are customer funded and delivered.</p>	<p>1. The City notes the Water Corporations comments in relation to infrastructure requirements associated with servicing the northern portion of the Kalamunda Activity Centre Plan (KACP) with wastewater.</p> <p>The City understands that an infrastructure cost sharing arrangement will be required to enable those lots to realise their development potential, in accordance with the KACP.</p> <p>Given the fragmented land ownership, it is unlikely that demand will be immediate for the development of those lots impacted, rather likely to progressively develop as the market demands over the life of the KACP. Therefore, it is considered that the pump station may be brought forward in the Water Corporations capital works program, as and when demand eventuates.</p> <p>It is recommended that the Part 1 – Implementation Section of the KACP be updated to require those lots not serviced by Water Corporations sewer network not be able to develop until the wastewater pump station is developed or a cost sharing agreement has been prepared.</p> <p>2. Noted. No change to the Scheme Amendment is proposed in relation to the servicing of water infrastructure, as it is expected that not all lots will realise the maximum development yield within the life of the KACP. In this regard, it will be a first in best dressed scenario, until demand reaches a level that prompts the upgrades to be scheduled in Water Corporations capital works program.</p>