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Date: January 29 2012

**TO: Rhonda Harvey
Acting CEO
Shire of Kalamunda**

CC: NRPG committee

**Subject: Submission on Kalamunda Advancing: Strategic Community
Plan to 2022**

Once again NRPG welcomes the opportunity to comment on an important document, directed at shaping and protecting the future of Kalamunda Shire. The NRPG appreciates this opportunity to participate in the Shire's decision making and planning processes.

As you are aware, the Nature Reserves Preservation Group (NRPG) Inc. is the environmental umbrella group for residents of the Shire of Kalamunda involved in, or concerned with, preserving the natural environment of the Shire. With close to 100 members each year, it may be seen as a broadly representative resident body.

This submission comments on the initiative in relation to the broader issues of regional parks/greenways/potential and existing wildlife corridors and the initiative's relationship with these. It concentrates on our main area of concern, the preservation of the natural environment within the Shire and considers other areas of relevance to our objectives.

Despite this plan emphasising at various points, the importance of protecting the natural environment, we fear that, in the face of increasing pressure on that environment from population growth, industrial and residential developments and other statutory policies, protection will not be sufficiently robust. With each new development we fear an escalating rate of decline in the area of remnant bushland and wetland.

Failure to protect an already fragile natural environment cannot be corrected at a later date, as can such assets as public transport, physical infrastructure, housing, industry and commerce. The natural environment and biodiversity, so much a part of our Shire, once damaged beyond a certain point, cannot be reclaimed.

Body of submission:

The submission will address the main areas of concern to NRPG by quoting a plan reference and/or page number and give comments in italics within a box.

p. 1

The President's message applauds the deep connection residents have '...with the environmental and cultural heritage of the region', sees the Shire living '...in harmony with its natural environment' and a future where we '...continue to care for our environmental and cultural heritage.' These laudable thoughts must be seen to be more than mere rhetoric.

p. 3 'Introduction'

The 'three communities' within the Shire should still be acknowledged as such, whilst ensuring equal consideration is given to each community. Some residents of the 'foothills community' feel that little consideration is given to their views whenever developments are planned in the area and that intense development of their area is inevitable.

p. 4 'Community Profile'

Whilst this is simply an outline of the community, could the figures be re-checked? The 2011 census has the population as 56462 with a population growth from 2001 to 2011 of 16.1%. Whilst describing the Shire, it may be pertinent to acknowledge it as a component of a world-class biodiversity hotspot, containing rare flora and fauna unique to the area, some of which are threatened with extinction. Such an acknowledgement would do the Shire's environmental image no harm.

p. 5 Forrestfield Industrial Area.

Despite rezoning not yet having taken place, the tenor of this section appears to reflect an attitude that the rezoning is a fait accompli, giving the consultation process short shrift. This paragraph should perhaps have the following added to emphasise the Shire's commitment to the environment: 'Whilst this opportunity poses significant challenges, the Shire will manage these to have minimal impact on the natural environment and on current and future residents.'

p. 6 paragraph 2. Since orchards and vineyards may be defined as 'intensive horticultural activities', re-word this to read:

'...include such intensive horticultural activities as orchards and vineyards and grazing, animal agistment...' etc.

para.3 ‘The natural assets that the Shire cares for are amongst Perth’s finest.’

Expand this to: ‘... among south west Western Australia’s and Perth’s finest, including wetlands of national and international environmental significance. These and the areas of aboriginal cultural significance all require preservation if these assets are to survive.

Para. 3 ‘The Shire and its community has [sic] a long and prominent track record...’

Despite this assertion, many natural bushland areas within the Shire have been lost to wholesale clearing and neglect on the part of owners. Currently, even Bush Forever sites are under threat. These remnant natural areas are characteristic of what makes the Shire so special. Loss of these means loss of attraction, loss of tourism/visitor numbers and therefore financial loss. A combination of development, population growth and climate change pressures have caused the degradation of many areas and threatens their long- term health and survival.

p. 8 ‘What Our Community Told Us’

Are these ‘themes’ in any order of priority? This should be clarified in the introductory lines. Is the draft document considered an effective reflection of these community themes? Since the Shire has been growing since its inception why recognise a ‘growth stage’ at this point?

p. 9 ‘Future of the Special Rural Areas’

Currently, many of these pressures seem to be ignored by the Shire. Commercial ‘abuses’ should be the basis for action by the Shire, rather than the current laissez-faire attitude.

p. 9 ‘Future land uses in the Orchard Areas’

The present syntax is incorrect. This section needs re-writing to clarify who needs to be the broker.

p. 10 ‘Sustainable Development...’

This section conveys nothing of the urgency for action to preserve the remnant vegetation and natural areas, particularly action to preserve the rapidly dwindling [<7%remaining] Forrestfield vegetation Complex. The inference is that, since we have this ‘relatively high percentage ...’ all is well and that all that is required is to ‘develop sustainably’.

p. 10 ‘Public Transport’

Despite mention in S.P. 3, perhaps reference could be made here to recognition of the importance of cycleways [cf. Regional Bike Plan (EMRC) 2011] in any strategy to reduce pressures on public transport?

p. 10 'Optimisation and Rationalisation...'

Acknowledge that, since one of the Shire's major assets is its 'relatively high percentage of remnant vegetation and natural areas' and that these are characteristic of the Shire and an accepted attraction to residents (past, present and future), such 'optimisation and rationalisation' should not be at the expense of these assets. Preserving them undoubtedly 'provides a benefit to the broader community.'

p. 10 'Urban Design and Streetscape'

This is an area needing work. Recently, the fast food entry statement to Kalamunda townsite was demolished. Its replacement may well be another fast food outlet. This decision in no way lifts the appearance of Kalamunda. Planning and approval emphasis should be placed on innovative yet workable initiatives such as shade tree plantings [their part in reducing the 'heat island effect' and therefore the load on air conditioning devices is beyond challenge], storm water harvesting [including the use of permeable pavements on areas of hardstanding such as carparks, footpaths and driveways] and environmentally beneficial public arts projects.

p. 12 'Shire of Kalamunda Informing Strategies'

Having previously had the Wildlife Corridor Strategy incorrectly described as a 'Plan...a guideline document that has no formal status...' [Draft Local Planning Strategy 2011 p. 46] it has now disappeared completely from this list, as has the Shire's District Conservation Strategy. Both should be listed, regardless of the fact that both may be contained (in essence) within the Local Biodiversity Strategy, since several recommendations from strategies have failed to 'inform' any later strategy. Is there any reason why there are no review dates for either the Water Action Plan or the Weed Control Strategy?

p. 14 'Community Facilities Plan' – table:

Are there any capital works classed as 'environmental' directed at the natural environment or are such works hidden under 'Parks' or 'Sports Grounds and Facilities'?

p.14 'Our Vision Story'

- '...protected and enhanced the pristine remnant bushland responsibly...'

This suggests that pristine remnant bushland only has enjoyed protection and enhancement. Suggest 'pristine' be omitted.

p. 15 'Aspirational Values ... Harmony'

Whilst we 'create and innovate', 'take risks' and 'ensure'- when it comes to our natural asset, we simply 'strive to retain'. Be positive and avoid such weasel phrases. 'We will retain' sounds more in line with a serious aspiration.

p. 16 ‘Strategic Priorities...’

*Confirm that these are not in order of priority derived from public consultation”
Clarify this listing.*

‘SP5- Kalamunda Clean and Green’

‘Ensuring the sustainability...’ This is more like it – positive.

p. 18 Third paragraph – ‘We will design out crime...’

This phrase fits in well with much of the language used in the document, the characteristics of which are vagueness and opacity. Perhaps more simple language throughout would help our understanding.

p. 19 ‘Community Safety and Ranger Services’ strategy 1.5.4

The importance of implementing this strategy cannot be overstressed. Rangers must be able to be contacted at any time. Staffing levels and rosters should reflect this imperative.

p. 21 ‘Number of people volunteering’

Given the forecast ageing of the population, this should see a commensurate increase in the number of people volunteering which should make this target more readily achievable. [suggest ‘over time’ is redundant given that 2022 is stated].

p. 22 ‘Within the townsite of Kalamunda...’

Pleasant, flowery prose marred by typos. Prominently placed fast food outlets do little to give ‘vibrancy’ to these assets.

p. 26 Strategic Priority 3: Kalamunda Develops’

Using the phrase ‘Using our land and assets...’ denies land the status of an asset. Unfortunately, the whole thrust of this Priority gives the impression that, not only is development the prime focus of the Shire (in that assets, undeveloped or ‘fallow’ are of no importance or value) but that sustainability and growth are always compatible. This ignores the fact that, at some stage these two become mutually exclusive to a degree where we can either have ‘growth’ or we can have ‘sustainability’ – not both. Acknowledgement of this needs to be reflected in the document. There will be a point at which further loss of the defining and highly valued natural areas within the Shire cannot be permitted.

p. 26 paragraph 2 ‘The Shire prides itself on being environmentally friendly.’

Despite this pride and despite the Shire’s environmental strategies and initiatives, public open space is still seen as taking precedence over areas of remnant natural vegetation which are still being lost through neglect, design or development. These include Bush Forever sites. A section of one such BF site is about to be cleared to make way for more ‘public open space’ (grassed pitches), despite the fact that the maintenance costs for natural bushland are significantly less than those for such amenities as sports ovals. This paragraph should also include mention of the Shire’s own environmental policies and strategies, not simply State policy.

p. 26 paragraph 4 ‘The future of the Special Rural Areas...’

The rapid growth on Perth Airport land and the projected employment opportunities should not override preservation of biodiversity within the Shire. Whilst the airport has dedicated Conservation Precincts, we do not.

p. 27 paragraph 1 ‘...urban infill’

With increased urbanisation, the document needs to stress the importance of subdivision back yards in providing linkages and corridors between areas of remnant natural vegetation. Ku-ring-gai LGA (NSW) incorporates such a concept in its environmental strategies.

p. 27 ‘Strategic Land Use Planning’

Ensure strategies in this section reflect the importance of current and potential wildlife corridors, linkages, greenways and support the establishment of a Foothills Regional Park incorporating the above, Bush Forever sites and other remnant areas of natural vegetation. NRPG has long supported and lobbied for this concept

p. 28 Strategy 3.3.3

Expand the descriptor ‘passive solar design’ to include an emphasis on the building’s orientation and include the concept of two-storey clustered developments leaving more space for plantings to reduce the heat island effect and improve the visual amenity of the development.

p. 28 Strategy 3.3.4

The Shire should be researching this initiative since innovations are developing exponentially. Vancouver City has, for some time endeavoured to have new commercial buildings built to take rooftop solar panels (with all trunking and fittings built in) despite solar installation costs at the time being uneconomical. This is a great example of forward planning.

p. 29 Strategy 3.5.1

We seem to have a problem creating such streetscapes, particularly at the entry point previously mentioned. Perhaps more teeth are required in the Shire's planning approval bite?

p. 29 Strategy 3.7.1

Be more specific than 'maintain, refurbish or upgrade' and 'ensure adequate processes'. Adopt and ensure that all new developments comply with water sensitive urban design parameters. Tackle head-on the longstanding problem of erosion and lack of effective erosion control in the Shire. Ensure that all works carried out are co-ordinated with the relevant Shire sections. This will avoid past sad examples of destruction of reserve revegetation plantings by mowing or utility contractors.

p. 30 'Measuring Success Strategic Priority 3...'

The baseline data should include reference to the Shire's Wildlife Corridor Strategy, Local Biodiversity Strategy and Bush Forever sites under its stewardship. The target should also include a commitment to retain natural bushland areas deserving of protection under those strategies.

p. 31 'Strategic Priority 4...'

Parameters governing 'bringing this land to market in the next five years.' should be defined, using the constraints of the preservation of the natural environment within the District Conservation Strategy, the Wildlife Corridor Strategy and the Local Biodiversity Strategy. These should feature in each of these Strategic Priorities.

p. 31 paragraph 3

The 'accessibility' of land within the Forrestfield High Wycombe area should be moderated by the need for areas of natural vegetation requiring protection (such as Bush Forever sites, wetland areas and areas containing DRF or remnant TECs) to receive protection. Adequate and effective buffer zones and environmentally sensitive design of developments should address this. The creation of increased residential and industrial densities has already resulted in the loss of significant areas of wetland in High Wycombe. This loss should, in future, be minimised or avoided.

p. 31 paragraph 6

When considering 'high-order infrastructure' consideration might be given to a distinctly pro-active provision of electric vehicle charging points to bring us up to the level of innovation of some other LGAs.

p. 32 paragraph 3

The disposal of waste water, particularly storm water, should be seen as an opportunity for innovative thinking rather than as an obstacle to progress. The syntax also needs revising. In its present form, the paragraph is confusing.

p. 32 Strategy 4.1.1

Since major creek lines flow into the coastal plain and the Perth Airport estate, there is a strong environmental nexus between the two areas. The pro-active work recommended should extend to the environmental considerations whenever looking to 'leverage opportunities for the Shire... '.

p. 33 Strategy 4.2.3

Without some definition, the significance of 'a benefit to the broader community' is unclear.

p. 33 Strategy 4.2.4

Clarify the criteria for or definition of 'equitable balance' to be used in the preparation of this strategy.

p. 36 Strategic Priority 5

This strategy is perhaps our main focus. Whilst the text is encouraging, the following comments reflect our growing concern that despite the Shire's '...strong environmental management credentials to date...' and the efforts of an efficient and dedicated environmental section, we are still losing natural remnant vegetation at an alarming rate. NRPG is still fighting battles first fought more than 20 years ago in defence of that vegetation. We fear that, when it comes to balancing 'environmental conservation and development', the former is still outweighed by the latter.

P. 36 Strategic Priority 5 – dot points

Although it may be seen as encompassed by dot point three, the principle of low-carbon efficient energy use deserves a dot point, given the increasing importance of this concept.

p. 36 paragraph 1 '...over the landscape...'

Insert 'due to land clearing and other human activities.' Replace '...an uncertain future.' With 'extinction.'

p. 36 paragraph 4

Despite these ‘strong environmental credentials’ which exist in the form of the Shire’s environmental strategies and initiatives, the recommendations from those initiatives are frequently not implemented, making them irrelevant. Recommendation without implementation becomes mere empty rhetoric.

In light of the reducing rainfall and the increasing human consumption of water resources, more action is required to address this situation. Initiatives such as harvesting of storm/waste water to replenish aquifers and to supply appropriate equipment, limiting bore water draw down and a halt to all clearing, draining or filling of wetlands are essential to combat this problem effectively.

p. 37 Objective 5.1

Replace ‘managing’ with ‘protecting.’

p. 37 Strategy 5.1.1

Surely the District Conservation Strategy should already function as this ‘overarching’ plan? If so, it should continue to receive updating to tackle emerging problems. If not, its relevance and relationship to any new overarching plan should be clearly stated.

p. 37 Strategy 5.1.5

Ensure these programmes are delivered to all Shire staff, especially contractors carrying out Shire work. Stress the importance of and benefits to be derived from caring for the natural environment and following sustainable strategies through water saving, recycling, waste reduction and similar initiatives. Ensure communication between Shire departments is efficient and effective. This will avoid repeats of past communication breakdowns resulting in damage to the natural environment. To assess the effectiveness of these programmes, establish the popular ‘key performance indicators’ and provide feedback on that performance.

p. 37 Objective 5.2

Replace ‘manage’ with ‘protect’. With this strategy concentrating on the natural environment, the concept of protection needs stressing. Since the word ‘manage’ by definition encompasses the Shire’s role its use here is redundant. Under the current regime, ‘managing’ has failed to protect much of the local bushland.

p. 37 Strategy 5.2.3

*Include details of the ‘fire-weed cycle’ and its importance in tackling post-fire weeds. Shire staff are fully aware of the importance of this concept and, where provided with a budget allocation, implement the strategy effectively. This is one area of land management that **MUST** receive its budget allocation. Weed incursion into natural vegetation degrades that vegetation and increases its level of fire hazard potential.*

Pest management is vital for protection of native fauna. Currently, the Shire seems very aware of this and is to be commended for its efforts, which need to continue and be increased.

p. 37 Strategy 5.2.4

In its current form the sentence makes no sense. John Cleese would be proud of it.

p. 37 Objective 5.3

Encouraging to see this objective described in these terms – very perceptive. Perhaps include here a reference to exploring the replacement of Shire vehicles (passenger and commercial) with hybrid or electric vehicles. [see comments p. 32 para. 6]

p. 37 Strategy 5.3.1

An excellent strategy. To give the residents an appreciation of the Shire's sensitivity to this and other sustainability topics, give the population the results of efforts to operate in a sustainable manner. Residents need to be linked to these initiatives and to know when the Shire is doing the right thing by the environment. Staff may also be inspired by such feedback.

p. 37 Strategy 5.3.2

Include here initiatives such as sustainable design for all new Shire facilities, retrofitting where possible, stressing the financial benefits flowing to the Shire and the benefits to the environment derived from such initiatives.

p. 38 Strategy 5.4.2

Change 'Investigate' to 'Implement' using the results of past investigations that have already proved the effectiveness of the technique. Failing that, change to 'Investigate and implement...'

p. 38 Strategy 5.4.3

*Identifying opportunities is encouraging. Give this strategy more muscle by re-wording it. 'Develop a public open space strategy that **reduces** consumption of bore and scheme water.'*

p. 38 Strategy 5.4.4

See comments p. 10 Urban Design and Streetscapes. Comments apply to this strategy. Under this strategy, address the erosion issues within the Shire.

p. 38 Strategies 5.5.2 and 5.5.3

As part of these, keep the residents informed of the success or otherwise of the initiatives.

p. 38 Objective 5.6

Given the inordinate length of time required for any such sites to become suitable for development, the strategies employed should be given a high priority.

p. 39 ‘Measuring the Success of Strategic Priority 5’

It is extremely disappointing to see ‘to be developed’ in the two columns. Since this objective is the only one to exhibit this phrase to such a degree, is there a reason for it? An explanation may ease our concern. It is vital to have the baseline data established, the target stated and the success or otherwise of the strategy to be relayed to the residents. [see previous comments on giving feedback]. Such feedback needs to be highly detailed and prominently displayed.

p. 40 ‘Strategic Priority 6’ Principle 6: ‘The Shire communicates...’

Advertising for developments and initiatives such as new strategies or development proposals needs to be extensive. It should be more than simply the minimum required under legislation. It should also avoid the old strategy of ensuring submissions are compiled during periods such as Christmas, Easter and other public holiday periods. To its credit, the Shire, advertising its draft Local Planning Strategy in 2011, went far beyond the minimum requirements. This should become the recognised ‘best practice’ for such initiative.

p. 41 paragraph 2

*NRPG has repeatedly requested the Shire implement a voluntary environmental levy, citing the success of this in several Eastern States local government authorities, and highlighting the overwhelming community support for a **compulsory** environmental levy. In light of the Shire’s insistence on continuing its ‘asset’ [read ‘reserves’] rationalisation programme, these requests will continue to be made at budget consideration time, as we fail to see the logic in refusing to accept such a ‘win-win’ initiative.*

Conclusion.

The importance of this plan for the rest of the metropolitan area should not be overlooked. The whole scarp and foothills provide, not simply an attractive backdrop and natural buffer to the larger metropolitan area on the coastal plain, but act as its lungs. In aesthetic and physical terms, the characteristics of our Shire should be preserved. This plan should, through its attention to detail ensure that these characteristics are preserved.

The NRPG, whilst welcoming the opportunity to make a submission on the plan, remains concerned that reservations and suggested changes expressed in our submission will fail to amend any sections of the draft. There is also concern that, despite the plan stressing the importance of the natural environment and biodiversity, these values will continue to suffer when competing with development pressures.

It is essential that the final draft of the plan accurately reflects the vision statements, which must be seen to be more than simply words.

Tony Fowler
Acting President/Chair

29/1/2012