

City of Greater Geraldton – Public Open Space Strategy – Schedule of Submissions

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
1 (27-08-2014)	Department of Education	The Department acknowledges the role that school facilities can play in the City's POS Strategy. The Department remains committed to the development and use of shared facilities particularly open space.		Note submission.
2 (02-09-2014)	Department of Aboriginal Affairs	<p>There are 58 Registered Aboriginal heritage places within the City of Greater Geraldton.</p> <p>It is understood there is no current proposal to conduct development within this area. It is also acknowledged that the retention of public open space within the region will assist in the protection of some Aboriginal heritage placed and that the Strategy document contains a recommendation that land users contact the Yamatji Land and Sea Council regarding the heritage significance of the public open spaces.</p> <p>Prior to commencing any works associated with the Plan it is recommended that developers are advised to familiarize themselves with the State's Cultural Heritage Due Diligence Guidelines (the Guidelines). These have been developed to assist proponents identify any risk to Aboriginal heritage and to mitigate risk where heritage sited may be present.</p>	It is noted that there are 58 Registered Aboriginal Sites within the Greater Geraldton area. At such time that any development takes place within the affected areas, the developer will be required to comply with the requirements of the <i>Aboriginal Heritage Act 1972</i> and the Cultural Heritage Due Diligence Guidelines.	Note submission.
3 (05-09-2014)	Department of Lands	No objection.		Note submission.
4 (24-09-2014)	Department of Parks and Wildlife	<p>Some of the Beard vegetation types in and around Geraldton area below the <i>National Objectives and Targets for Biodiversity Conservation 2001-2005</i> (Commonwealth of Australia 2001) which recognises that the retention of 30 per cent or more of the pre-clearing extent of each ecological community is necessary if Australia's biological diversity is to be protected. This is the threshold level below which species loss appears to accelerate exponentially and loss below this level should be prevented.</p> <p>The Department strongly supports the inclusion of measures which will contribute to the protection of remnant vegetation within public open space.</p>		Note submission.

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4 continued		It is noted that there are references made to 'Department of Environment and Conservation' in the strategy. The DEC ceased to exist on 30 June 2013 and was divided to become the Department of Parks and Wildlife and the Department of Environmental Regulation.	The Strategy should be updated to refer to the correct Department.	Uphold submission. Modify the document to ensure that references to 'Department of Environment and Conservation' are amended to 'Department of Parks and Wildlife' and the 'Department of Environmental Regulation' as necessary.
5 (26-09-2014)	Department of Housing	<p>The Strategy provides a comprehensive analysis of public open space and a coherent set of locality based strategies. Recognition of the functionality and quality of public open space is central to the Strategy and the intent to rationalise certain land.</p> <p>Section 3 of the Strategy relating to Regional Variations proposed revisions to a number of POS policy provisions, which raises various concerns in terms of the additional cost impositions upon land and housing projects.</p> <p>Item 3.2 Cash-in-lieu The prevailing standard of applying cash-in-lieu to subdivisions of more than five lots has practical benefits in respect to assisting opportunities for small scale, infill housing development. While it is acknowledged that the <i>Planning and Development Act 2005</i> provides for a cash-in-lieu contribution to be applied to subdivisions of three or more lots, it is considered that lowering the threshold will impose an additional cost burden on small scale housing projects and may prejudice project viability.</p>	<p>It should be noted that under the <i>Planning and Development Act 2005</i> (Section 153) the minimum amount of lots created before the developer may be required to give up a public open space contribution is 3 lots.</p> <p>Also the WAPC's Development Control Policy 1.3 – Strata Titles (Clause 3.3), states that strata title developments may require a contribution towards the provision of public facilities, such as open space.</p> <p>Additionally, the Department of Planning is currently conducting a review of the <i>Planning and Development Act 2005</i>. The review has recommended that POS contribution or cash-in-lieu can be requested for subdivisions that result in the creation of less than 3 lots, if it's considered a necessary contribution to the locality.</p>	<p>Note submission.</p> <p>Dismiss submission.</p>

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5 continued		Of equal concern is the proposed application of a cash-in-lieu contribution upon strata subdivisions.	The POS Strategy is therefore consistent with legislation and policy. It is not considered onerous for development, which will ultimately increase the demand for POS, contribute towards its provision.	
		The Department is opposed to both proposals in terms of the disincentive that they create for the provision of affordable infill housing.		
		Item 3.3 Maintenance of POS The proposal to require POS in new subdivisions to be maintained for a period of five years is excessive. The norm of a two year maintenance period is sufficient duration to ensure suitable establishment of plantings in parallel with the build out of the surrounding housing. Two years coincides with the appropriate period within which the City receives rate revenues from the locality to fund the maintenance of the POS. The suggestion that a longer maintenance period may encourage developers to use better quality materials is arguable as the quality of materials is determined by the standards acceptable for handover to the City, irrespective of the duration of the maintenance period. A maintenance period of five years is an unreasonable imposition on developers and is opposed by the Department.	The original intent behind requesting the variation to the maintenance period was to: <ul style="list-style-type: none"> • Ensure consolidation of landscaping/ regeneration works and to ensure plantings are successful. • If unsuccessful a review of plant selections, irrigation efficiencies or maintenance strategies can occur. • Encourage developers to use better quality materials. • Provide the City with more realistic maintenance costings which will provide for more effective budgeting. This additional time period is still considered necessary where more substantial landscaping and facilities are provided for neighbourhood and district POS and foreshore reserves.	Uphold (in part) submission. Modify Section 3.3 and Section 5.2 to state that the 5 year maintenance period is only required where neighbourhood and district public open space or foreshore reserves are being developed. Local open space and conservation areas will remain at the existing 2 years maintenance period.
		Locality Strategies The Department has significant housing presence in localities such as Beachlands, Spalding and Rangeway. It is intending to undertake a large scale land development project in Karloo and parts of Wandina. The Department supports the strategies which are outlined for these localities.		Note submission.
		The Department is also keen to maintain dialogue with the City in the acquisition and development of residual portion of public open space. The Department supports the proceeds of sale of residual sites being directed to public open space development in the locality.		Note submission.

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6 (26-09-2014)	Sunset Beach Community Group	<p>The SBCG is supportive of a number of elements within the strategy, however provides the following comments:</p> <p>When it comes to quantifying POS in Sunset Beach, Table 1 (page 6) suggests that the locality has a total of 12.1092ha (10.07%) but the table on page 38 indicated that the total quantity of POS is 8.3561ha (6.96%).</p> <p>Either way, the total area of land dedicated to POS in Sunset Beach is either at or below the 10% threshold.</p> <p>Given this, carving up of POS within the Sunset Beach locality is not consistent with the State planning framework.</p> <p>The Eastbourne (Bosley St) Reserve and the Spalding Horse and Pony Club are shown as 'residual' and recommend that the CGG 'dispose of residential POS areas with portions of POS being redeveloped in these areas'.</p> <p>The SBCG has already committed considerable time and funds towards the planning for the entire Eastbourne (Bosley St) Reserve to be redeveloped into a multiple use recreation area that reflects community needs and is walking to and spending time in.</p> <p>Disposal of these sites is not consistent with the Strategy's aim of securing and increasing the quality of POS within established localities.</p>	<p>Table 1 (page 6) calculates the amount of POS available in the locality at present, being 10.07%. It is worthy to note that this is without including the land area of the Spalding Horse and Pony Club given that it is Regional open space and not part of the 10% calculation (see Part 5.3.14 of the Background Report).</p> <p>The City (as part of the Sunset Beach Precinct Plan) has resolved to retain the Eastbourne Reserve. The area provides for open space adjacent to the proposed activity centre precinct and provides a strong link to the coast.</p> <p>Given the community support shown through the advertising of the Sunset Beach Precinct Plan, Eastbourne Reserve should be considered a higher priority for improvements in conjunction with the future development of the activity centre precinct.</p>	<p>Uphold submission.</p> <p>Modify document (including the locality table in Section 6.15, and the locality map in Appendix 3) to retain the Eastbourne Reserve as public open space.</p> <p>Include the following objective within the Sunset Beach locality table in Section 6.15:</p> <p><i>"Support progressive improvements to Eastbourne Reserve as part of the development of the Sunset Beach Activity Centre".</i></p>

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6 continued		<p>A set of criteria was developed to identify potential residual areas.</p> <p>The assessment of Eastbourne (Bosley St) reserve and the Spalding Horse and Pony Club as residual is not consistent with the stated criteria for doing so as demonstrated below:</p> <ul style="list-style-type: none"> • Site being too small for sustainable development – both areas are greater than 3,000m² (the minimum size for a local park). Areas of this size are becoming rare and valuable due to the current propensity to provide bare minimum POS. • Site being in close proximity to other more preferable POS areas either within the locality or in an overlapping catchment from an adjacent locality – there are no quality, well maintained play areas within a 5 minute walk of most residents of Sunset Beach. • Location of the site in established localities which does not reflect community use of POS – the Spalding Horse and Pony Club has been enjoyed by generations of local residents since the 1970s. The Eastbourne (Bosley St) Reserve is very well positioned to be a focal point for the recreation of the surrounding residents. • Excess provision of a certain hierarchy of POS within a locality – given that Sunset Beach is below the minimum 10% POS requirement, which particular type of POS is it in excess of? This is not stated in the Strategy. • Financial implications to the CGG over the ultimate and best use of the site – the SBCG and the Spalding Horse and Pony Club are committed to development and preservation of multiple use community open space that reflects the needs of local residents and is financially and environmentally sustainable. 	<p>For an area of land to be considered 'residual' it is not strictly necessary that it comply with all stated criteria. Section 2.4 simply lists a number of basic principles underlining why POS was considered residual.</p> <p>Given the proposed modification (above) to retain Eastbourne Reserve as POS, the allocation in Sunset Beach exceeds the 10% requirement (being 10.07%).</p> <p>With regard to the comments involving the Spalding Horse and Pony Club land area, this matter has been dealt with as part of the City's Sporting Futures Report, which was adopted by Council at its Special Council Meeting on 25 March 2013.</p> <p>The report specifically recommends:</p> <ol style="list-style-type: none"> 1. Facilitate the relocation of the Spalding Park Horse and Pony Club to a suitable negotiated location with long term tenure as a high priority. 2. Ensure that any relocation is fully funded in accordance with the Principles of this Report and Council Policy CP048 Sporting Futures. 3. Commit to the redevelopment of the site currently utilised by the Spalding Park Horse and Pony Club site as part of the Sunset Beach Commercial Activity Centre. This redevelopment would include potential residential, commercial, community and mixed uses that will be investigated as part of the Precinct Planning as a high priority. 	Dismiss submission.

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6 continued		<ul style="list-style-type: none"> Prioritisation of capital expenditure in localities where higher amenity POS areas require additional funds for maintenance – The SBCG is committed to attracting funding from a number of sources to stage the sustainable redevelopment of Eastbourne (Bosley Street) Reserve in a financially responsible manner. Site considered unsafe due to anti-social behaviour – The SBCG used part of its seed funding to have the dead limbs and rubbish removed from underneath the line of Tamarisks on the Eastbourne Road side of the Reserve. This was to improve the aesthetics of the area and prevent the possibility of anti-social behaviour. The rest of the reserve is currently undeveloped and does not attract any issues. 	<p>The City is also in receipt of a letter from the Minister for Lands to the Geraldton MLA dated 19 July 2011, advising of the City's position on the relocation of the Spalding Horse and Pony Club, and recommended that the MLA's assistance be provided to the club to ensure that the relocation was accomplished.</p> <p>In addition to this, Council recently resolved at the meeting held on 28 October 2014 to endorse the Sunset Beach Precinct Plan which recommended the relocation of the Spalding Horse and Pony Club and supported the possible redevelopment of the site.</p>	
7 (30-09-2014)	Department of Sport and Recreation	<p>Application of the POS Classification Framework The City is commended for applying the Classification Framework for POS developed by the Department.</p> <p>Within the context of the hierarchy, it would be valuable to acknowledge that the different tiers within the hierarchy all have the capacity to service local community needs if designed appropriately. For example the location of neighbourhood open space should negate the need for local open space in the same walkable catchment.</p>	<p>The Strategy should recognise that each tier of the hierarchy has the capacity to service others.</p>	<p>Uphold submission.</p> <p>Include within Section 4.0 "Framework for Public Open Space" a statement recognising that there is opportunity for public open space to service multiple categories of the hierarchy.</p>
		<p>It is recommended that the Strategy adopt the terminology proposed within the Classification Framework for Public Open Space, which suggests replacing out-dated terms like 'active' and 'passive' with 'sport', 'recreation' and 'nature'. The Department of Planning have begun to embed these new terms in the projects and policy reviews, including the <i>Liveable Neighbourhoods</i> review.</p>	<p>The Strategy's terminology is based on the current WAPC <i>Liveable Neighbourhoods</i> document.</p> <p>There is no clear timeframe given for the completion of the <i>Liveable Neighbourhoods</i> review. However, if as part of the review terminology changes, the City may update the Strategy at that time.</p>	<p>Note submission.</p>

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7 continued		<p>The incorporation of the City's preferred quality/service level is a valuable means of both managing community expectations and providing clarity for the development industry.</p> <ul style="list-style-type: none"> Local Open Space – it is recommended that the City consider including children's play spaces and turfed areas. A combination of natural play features and more contemporary play opportunities may offer cost effective options. District and Regional Open Space – it is identified that most people will drive to district spaces and it is considered that the typical size of these sites are sufficient to support onsite parking. It is recommended that the City review whether on-street parking will be sufficient to meet the needs of the site. As a means of managing community expectations, it may be worthwhile to specify whether lighting provided is park or sports field lighting. 	<p>The provision standards outline minimum standards only. Section 4.2 specifically states that the provisions are 'general standards only and variations can and will occur based on specific site requirements'.</p> <p>The baseline assists by giving developers a basic understanding of requirements and by managing community expectations of park facilities. It still allows for each POS area to be further developed based on actual needs.</p> <p>In line with this, it is neither sustainable nor warranted for every local POS to have a child's play area. However, minimal turfed areas is already a provision standard and is appropriate given the focus on reducing water dependence and associated costs.</p> <p>Again, on-street parking spaces are deemed to be a minimum requirement for district and regional open spaces. Where the specific conditions require it, additional parking can be requested.</p> <p>Given the type of lighting will depend on the facilities and function for the POS, and not just the classification in the hierarchy, this detail cannot be provided as a generic requirements in the standards.</p>	Dismiss submission.

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7 continued		<p>Conservation Areas Managed recreational access should be supported within conservation areas sited in public open space. All POS should be accessible to the community to some degree.</p> <p>It is acknowledged that some conservation spaces may not be appropriate for community access however in these instances environmental mechanisms should be used to acquire the site and they should not be included within the POS allocation.</p> <p>This may be the intent of the City however it is not clear in the report.</p> <p>It is acknowledged that the City has worked closely with WALGA to address local biodiversity issues and we should encourage consideration of future district reserves incorporating multiple functions, e.g. sport, recreation and preservation of the natural environment.</p>	<p>The Geraldton Regional Flora and Vegetation Survey (GRFVS) found that:</p> <ul style="list-style-type: none"> Only approximately 15% (6,112ha) of the original extent of vegetation remains in the survey area, which is only half the national target of 30% retention to achieve biodiversity conservation outcomes. The remaining vegetation is highly fragmented. Less than 2% of the remaining native vegetation in the survey area is currently protected by Department of Parks and Wildlife reserves. <p>In order to increase the protection of valuable remnant vegetation the Strategy implements a regional variation to increase the percentage of restricted use POS permitted within the 10% contribution from 2% to 5%.</p> <p>The hierarchy and provision standards proposed for 'Conservation Areas' does not mean that the areas are completely inaccessible, just that the activities and facilities on the site should be considerate of the overarching conservation intent.</p> <p>Of the available 289.81 hectares of POS proposed by the Strategy, only 44.6 hectares (15.3%) is 'Conservation'.</p>	Dismiss submission.
		<p>Supply of POS While it is helpful to align the percentage of POS supplied both across the City and within individual suburbs, it is equally important to consider the accessibility, functionality and quality of those spaces. Additionally, in the context of comparison by suburb, it is important to consider the types of spaces available and accessible in neighbouring suburbs or within discrete precincts.</p>	<p>The POS Strategy is bound by the methodology under <i>Liveable Neighbourhoods</i> which aligns the 10% POS allocation with localities.</p> <p>However the best efforts have been made to assess the POS allocation against multiple criteria and make recommendations for each locality based on the on ground specifics including accessibility, functionality and quality.</p>	Note submission.

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7 continued		Role of the Foreshore Recognition of the recreation value of the foreshore areas is an important component of the strategy and a reflection of community values. Whilst this report focuses solely on the land, consideration should also be given to near shore activities as these also affect the primary dune system etc., and need to be planned for.	Any recreational development along the coast will be subject to additional investigation and management (generally in the form of coastal management plans). These requirements are outside the scope of this Strategy.	Note submission.
		Residual POS Caution should be taken to ensure sufficient spaces are available to meet future and evolving needs. While current activities may not require space, future activities might. Sites can be reverted back to a more natural state while being preserved for future generations to determine the best use. The reduction of POS in areas that are already undersupplied is generally not supported.	The financial impacts on the City to upkeep 10% POS in each locality along with all regional open spaces and foreshore reserves is significant. In older established suburbs rectifying POS deficits would be extremely costly and would be unlikely to result in meeting local resident's needs with regards to providing sufficient facilities and high quality spaces. The community survey conducted by the City as part of the Strategy demonstrated that quality and well maintained facilities is an overriding factor that affects use of open space. These findings are in line with recent research conducted by ECU which found that the usability of space is as important as the proximity to space. Classifying POS areas as residual in localities where the POS allocation is under 10% has been carefully reviewed in relation to the specifics of each locality. In most cases the under provision is offset by an objective to bring all POS areas in line with their hierarchy and service level.	Dismiss submission.

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7 continued		<p>The City's suggestion that the beach and foreshore offset some of the under provision is reasonable; however local accessibility to open space or foreshore should be a key determining factor.</p> <p>E.g., The beach is not an accessible alternative in locality of Rangeway. This community is not in close proximity and has an undersupply of POS. This would indicate that more POS is required as opposed to less.</p> <p>Removal of sites experiencing anti-social behaviour is likely to result in relocation of that behaviour. Site redesign and activation could be more appropriate response.</p>	<p>The Strategy attempts a balanced approach at providing suitable high quality POS in each locality while using dual function regional open space and foreshore areas to support it.</p> <p>The community survey conducted by the City as part of the Strategy demonstrated a clear indication that the public spent most time visiting the foreshore for active and passive recreational use. In order to support the community's preference some established localities in close proximity to the coast have a reduced POS allocation.</p> <p>In the case of Rangeway while under the 10% provision, the locality has overlapping catchments with a number of POS areas in adjacent localities. The GRAMS reserve has also been targeted for development in line with the provision standards for district open space in the Strategy. This also reflects the outcomes of the Rangeway Utakarra Karloo Precinct Plan.</p>	Note submission.
		<p>Shared Use Shared use of education facilities is supported and should be encouraged where appropriate. Shared use arrangements should be formalised or strategies put in place to facilitate sharing.</p> <p>Without the appropriate mechanisms in place current availability of school sites may change over time, particularly with increased decision making power being devolved to school principals and the increase in the number of independent public schools.</p>	<p>The Strategy recognises the valuable addition that school facilities can provided in POS allocation within each locality. It also recommends that the Neighbourhood and District POS can be collocated with schools.</p> <p>It is also worthy to note the Department of Education's submission (Submission 1) where they state the Department remains committed to the development and use of shared facilities particularly open space.</p>	Note submission.

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7 continued		<p>Design, Construction and Maintenance/ Design Guidelines The <i>Public Parkland Planning and Design Guide (WA)</i> has recently been released and it is envisaged it will become a central point of reference for all entities involved in parkland planning, design and management.</p> <p>It is therefore recommended that Strategy adopt the principles identified within the Guide.</p> <p>It is recommended that proponents are encouraged to consider alternative fit for purpose options as opposed to the use of scheme water. Included in the Guide.</p>	<p>The <i>Public Parkland Planning and Design Guide (WA)</i> is large document that covers very broad and basic information and includes processes and case studies. Much of this information is considered superfluous.</p> <p>The Guidelines adopted by the City are also relatively broad in regard to directing design outcomes, however they have been specifically written to be responsive to local conditions, particularly climate.</p>	Dismiss submission.
		<p>The City should strengthen its position on the appropriateness of water features to ensure it is defensible. Wording should be along the lines of 'water features will not be supported'.</p>	<p>The intention is not to prevent any water features from being developed but to ensure that those that are developed are considered appropriate. The wording within the Strategy adequately reflects this.</p>	Dismiss submission.
		<p>Open Space by Locality Within the report there are no recommendations for future sport space. This would indicate that current provision is sufficient.</p> <p>It is recommended that this be reviewed and consideration of provision of sporting space to meet local as well as district needs is also assessed.</p> <p>The Strategy has good integration with existing CGG plans and strategies also though the Sporting Futures Report does not appear to be referenced in this document.</p> <p>It is recommended that the City identify what types of spaces are required in the yet to be developed areas, including future sporting space. This will serve as a guide for future proponents and provide appropriate support for the City should it need to address the State Administrative Tribunal.</p>	<p>It is important to note that the Strategy deals with public open space and not sporting activities.</p> <p>The issue of additional sporting areas has been adequately detailed in the City's Sporting Future Report, which was adopted by Council at its Special Council Meeting on 25 March 2013.</p>	Dismiss submission.

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8 (26-09-2014)	Humfrey Land Developments	<p>Supported in principle with the following comments:</p> <p>Construction of POS Clause 5.2 states 'due to the high cost of developing and maintaining POS, the CGG require developers to design and construct POS'.</p> <p>The design and construction aspect has always been a requirement, however to now place financial impost onto developers to install public facilities, e.g. water bubblers, play equipment, seating etc. will, as the CGG has suggested, be a high cost to developing POS. Developers cannot sustain the additional liability and will pass these costs onto the price of land, which goes against our vision to create affordable land.</p>	<p>Element 4 R37 of <i>Liveable Neighbourhoods</i> states:</p> <p><i>The WAPC will generally require public open space to be developed by a subdivider to a minimum standard that may include full earthworks, basic reticulation, grassing of key areas, pathways that form part of the overall pedestrian and/or cycle network, and maintenance for two summers.</i></p> <p>The wording “may include” reflects the fact that these listed items are an outline of what may be requested.</p> <p>Element 4 R37 of <i>Liveable Neighbourhoods</i> states:</p> <p><i>Development of public open space should be carried out in accordance with a landscape plan first approved by the local government.</i></p> <p>The City is not requesting works that cannot already be requested under the provisions of <i>Liveable Neighbourhoods</i>. Instead, the Strategy clearly outlines the City's position to ensure consistent application, which has not necessarily occurred in the past.</p> <p>If a development is of such a size that it warrants the allocation of a neighbourhood park then it is not considered onerous to require that developer (who has instigated the need) provide that infrastructure.</p>	Dismiss submission.

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8 continued		<p>Maintenance of POS Clause 3.3 proposes for the subdivider to maintain public open space for 5 years. This is unreasonable and will generally be impractical.</p> <p>Clause 3.3 states ‘two years is often not long enough to ensure consolidation of landscaping/regeneration of works to ascertain if plantings have been successful. Our experience and the formative advice obtained from landscape consultants is that two years is adequate. The CGG’s own words is that two years is <u>often</u> not long enough means that it is proven that two years is workable. Surely the CGG could hold and maintain some form of bond to secure its position against the need to upgrade a POS is conditions are not met.</p> <p>Additionally, if two years (24 months) is only often not long enough, we object to increasing the period another 36 months, or 150% in time.</p> <p>Another pertinent reason to object to this policy is that a developer generally comprises a syndicate of investors with purpose to subdivide and sell land. At the end of the project, therefore when the selling period is completed, the syndicate is wound up. The selling period is usually within two years of titles being issues. The proposed policy is impractical and will potentially breach formal Agreements in respect of when investor syndicates are to be legally finished. In other words, in the final stages of a development it will take an inordinate five years before final distribution to investors which is unacceptable. Furthermore, ongoing project administration without reasonable trade transactions will cause unnecessary expense to keep bank accounts open and to maintain corporate governance issues, which is unproductive and impractical.</p>	<p>The original intent behind requesting the variation to the maintenance period was to:</p> <ul style="list-style-type: none"> • Ensure consolidation of landscaping/regeneration works and to ensure plantings are successful. • If unsuccessful a review of plant selections, irrigation efficiencies or maintenance strategies can occur. • Encourage developers to use better quality materials. • Provide the City with more realistic maintenance costings which will provide for more effective budgeting. <p>This additional time period is still considered necessary where more substantial landscaping and facilities are provided for neighbourhood and district POS and foreshore reserves.</p> <p>The impact on developer syndicates is noted and therefore, to minimise any complications arising from the extended maintenance period, the City should allow the option of bonding the required works/maintenance.</p>	<p>Uphold (in part) submission.</p> <p>Modify Section 3.3 and Section 5.2 to state that the 5 year maintenance period is only required where neighbourhood and district public open space or foreshore reserves are being developed.</p> <p>Local open space and conservation areas will remain at the existing 2 years maintenance period.</p> <p>Include within Section 3.3 a statement allowing options to be pursued to bond works during the maintenance period.</p>

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8 continued		Where POS is established the CGG should consider preferential rating, rather than just creating an unnecessary burden in both time and cost for a third party.	It is the view that access to quality POS should be available to all community members, not just those who can afford it.	Dismiss submission.
9 (26-09-2014)	Private Landowner	<p>There seems little consideration for the consolidation and expansion of a natural environment – the beach, dune, marine environment.</p> <p>Some areas (St. George's, nodes along Chapman Road, Gray's, Separation, GSLSC) are clear focal points where erosion problems are being encountered and there are similar problems at other coastal locations.</p> <p>Why are we planning to remain in these locations when it is clear that development will suffer more damage?</p> <p>The Strategy states that in many localities with coastal parkland facilities that no more development to be planed nor budgeted for and that cash in lieu will be the mantra not a 10% allocation.</p> <p>However, what happens if these coastal areas disappear due to increasingly higher levels of surge?</p>	<p>The community survey conducted by the City as part of the Strategy demonstrated a clear indication that the public spent most time visiting the foreshore for active and passive recreational use. In order to support the community's preference some established localities in close proximity to the coast have a reduced POS allocation.</p> <p>The Strategy does identify areas of the coast as 'Activated Foreshore Reserve' and these would be the priority for coastal erosion measures.</p>	Note submission.
		<p>There is a lack of balance in the type of recreation land available in various suburbs.</p> <p>Why isn't it important to have adequate passive type parkland in all suburbs?</p> <p>For example, Wonthella has plenty of POS but it is geared for sport/organised sport and a small leased family park.</p> <p>The George Rd location was once used for recreation but is now a school. This location is not a substitute POS as the public can't use it.</p>	<p>The Strategy attempts to coordinate the distribution of POS across not just individual localities but the municipality as a whole.</p> <p>It is important for each locality to have appropriate passive POS available and in many cases this is achieved. In some localities this is more difficult however it has been reviewed by looking at the overlapping catchments for adjacent localities.</p>	Note submission.

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9 continued			<p>With regard to Wonthella, there is opportunity for the Eight Street Sports Complex to be multifunction and service more 'local' community needs. The Strategy also identifies investigating potential for the former Bluff Point to Narngulu Rail Corridor (south of Place road) to be developed as a POS link.</p> <p>The two schools sites along George Road (Geraldton Grammar and the former St Patricks) have not been considered as POS and based on their zonings and use have been treated as a deduction.</p>	
10 (01-10-2014)	Tourism WA	<p>Tourism WA commends the City on considering the need to improve and better understand the community's need for quality POS.</p> <p>Although touched upon, it is vital for the City to consider the needs of visitors using POS as well.</p> <p>Visitors to Greater Geraldton are attracted to the foreshore, park and bushland reserves. These areas could benefit from interpretive signage, appropriate footpaths, seating areas, toilet facilities and general maintenance as part of their review and potential revitalisation through this Strategy.</p>		Note submission.
11 (01-10-2014)	Department of Health	<p>All POS areas should provide a consistent level of facilities across all domains which include:</p> <ul style="list-style-type: none"> • Adequate shade. • Seating with/without tables. • Adequate off street parking. • Sanitary facilities at strategic locations. • Provision of drinking water fountains, BBQ facilities, refuse bins, etc. (as appropriate). 	The Strategy adopts a 5 tiered hierarchy of POS and proposes quality/service level for each to ensure consistency of facilities across the hierarchy. However, this recognises that from a financial and sustainability perspective not every POS area can, or should, be developed to provide all services.	Dismiss submission.
12 (01-10-2014)	Water Corporation	<p>No objections.</p> <p>Comments were supplied with regard to water usage and water efficiency potential.</p>		Note submission.

City of Greater Geraldton – Public Open Space Strategy – Schedule of Submissions

Number & Date	Submitter	Nature of Submission	Comment	Recommendation
13 (26-09-2014)	Private Landowner	<p>Object to the Catherine Street/ Harrison Street blocks in Bluff Point being possibly disposed of.</p> <p>Other subdivisions in the area north of the Bluff Point Primary School and west of Chapman Road have all been allotted POS. However the original large subdivision north of Hosken Street, west of Harrison Street, east of Kempton Street and south of Crowtherton Street have only these two blocks free of development.</p> <p>With many larger freehold blocks in the area undoubtedly set to be subdivided in the future it is imperative that these be retained for public open space.</p> <p>Whenever the area has been mowed and well-kept children have played.</p>	<p>Lot 58 Catherine Street and Lot 48 Harrison Street which have been identified in the Strategy as residual are not zoned nor reserved for Public Recreation purposes. As part of the original subdivision in 1971 the lots were transferred to the City on the understanding that the land would be held in trust by the City for the purpose of exchange. The explicit intention of the land is that it be disposed of in order to either purchase more suitable land for, or fund the development of, POS.</p> <p>Additionally, the lots are located in very close proximity to, and therefore have overlapping catchments with, Hemsley Park.</p>	Dismiss submission.
		<p>Purchased an adjacent block to build a passive solar home which was approved by Council in 1981. The design feature of the home is to capture the southerly breeze. If the neighbouring block is developed with any sort of building, chances are this will impinge on the cooling effect of the house.</p> <p>We feel we were given approval for such a dwelling and feel that this should be honoured now.</p>	<p>The explicit intention of the land is that it be disposed of in order to either purchase more suitable land for, or fund the development of, POS. Approvals given for development were based on the applicable planning/building framework at the time and not solely on the solar passive design.</p> <p>Any development on Lots 48 and 58 would also need to comply with the current planning/building framework.</p>	Dismiss submission.

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Number & Date	Submitter	Nature of Submission	Comment	Recommendation
13	City of Greater Geraldton.	<p>In September 2013 the Department of Planning released the 'Review of the <i>Planning and Development Act 2005</i>' as part of Planning Makes it Happen: Phase 2 reform.</p> <p>The key aim of the review is to consider the operation and effectiveness of the Planning Act to ensure that the planning system continues to deliver economically, socially, and environmentally.</p> <p>An anomaly in section 153 (2) means that the WAPC may require a land contribution to be given up where a subdivision creates less than two lots, but it may not require the equivalent cash in lieu to be paid.</p> <p>The review recognises that the anomaly may act as a deterrent to staging larger subdivisions to avoid a contribution and that this should be rectified to ensure consistency in achieving proper planning outcomes.</p> <p>As a result recommendation 4.1.2 states:</p> <p><i>Further, it is proposed to delete the limitation in section 153(b) such that cash-in-lieu provisions or the setting aside of land may apply to subdivisions that result in the creation of less than three lots if considered a necessary contribution to the locality.</i></p>	<p>As part of the Strategy the City is proposing a variation to the <i>Liveable Neighbourhood</i> POS requirements which does not request a contribution from a developer if producing 5 lots or fewer. The Strategy essentially overrides this provision and brings the POS contribution requirements into line with the <i>Planning and Development Act 2005</i> (Section 153) which states the minimum number of lots created before a POS contribution is required is 3 lots.</p> <p>This recognises that small or infill developments still increase the use and demand on POS and this should be accounted for.</p> <p>Given the Department of Planning is currently reviewing the planning framework to ensure effective economic, social and environmental decision making, the Strategy should reflect the recommendation to amend the <i>Planning and Development Act 2005</i>.</p>	<p>Uphold submission.</p> <p>Modify Section 3.2 of the Strategy to reflect the ability to request cash in lieu for POS if a subdivision results in the creation of less than three lots if considered necessary to the locality.</p>