

Shire Of Mundaring
7000 Great Eastern Highway
Mundaring WA 6073

18TH October, 2019

ATTENTION: SARAH MORGAN

Dear Sarah,

Re: PROPOSED CHANGES OF USE FROM LABORATORY (FORMER CSIRO RESEARCH FACILITY) TO RESIDENTIAL BUILDING – 1710 CLAYTON ROAD (CNR. FYFE STREET) HELENA VALLEY

I am a long term resident of Helena Valley, located approximately 400m south of this proposed development opposite the southern end of Fyfe Street. I have serious concerns about this change of use proposal and provide the following comments in support of my objections. My comments are related to the documentation supplied to landowners including a two page letter about the proposal, a 1:1000 scale site plan, a 1:200 scale floor plans and elevations.

1. Public comment and information provided

The information received from MSC indicates what this proposal will not be used for - ie aged person accommodation, lodging house, nursing home, motel, hotel, brothel etc, however the documentation released for public comment **contains no clear indication of what this building will be used for other than residential or who the proposed clientele will be.**

The documents refer to the **Helena Community Residence**, whatever that means. From discussion with the MSC planning department it would appear that they are of a similar, somewhat confused, viewpoint. A proposal catering for **mature adults around 45 years of age** is extremely vague explanation. The attached 3D graphics of the project seem to suggest a **Millenium retreat** or perhaps its a Fifo village which is just what we need in a family orientated rural/residential area. It would appear that the public are being asked to comment on incomplete information regarding this proposal. There appears to be a lack of transparency on the part of the applicant in this case and a possible reason for the proposal to be re advertised.

2. Repeated History and future development

In August 2015 council received a proposal for 15 self-contained units, caretaker's dwelling and communal facilities from the same applicant. The council documents indicate that **the details of the application were ambiguous** and that the proposal would create **highly undesirable precedent within the RR zone.**

Apart from the addition of one accessible dwelling (unit 6) this current proposal remains substantially the same as the 2015 application which was refused by council.

A later application to State Administrative Tribunal (SAT) resulted in suggestions that the site had the potential to be developed as a Park Home complex or Lifestyle Village.

In March 2017 MGA town planners submitted a rezone application on behalf of the same applicant from Rural Residential (RR2) to Additional Use zone (A11). The submission included an indicative development plan showing 14 self-contained units, a caretakers dwelling and communal facilities.

However the Fire Management Plan and the wastewater treatment documents indicated a different story.

The 2017 Fire Management Plan and Wastewater Treatment Plans (Fig 1 and 2c) indicated an additional 55 residential units referred to as a lifestyle Village.

The 2017 Wastewater Treatment and Effluent Disposal Report by B&PE consultants (Executive Summary) mentions an irrigation area based on a **site population of 110 people occupying 55 two bedroom units and 14 smaller units in the renovated CSIRO building.**

The report (Table 3 and section 6.2.2) indicates the area required for Hydraulic loading for 110 people is 2400sqm with the possibility of expansion to 3600sqm.

The current submission for public comment (Helena Community Residence, 20th September 2019) contains a 1.1000 site plan indicating a wastewater irrigation area of approx 3150sqm. (Calculated by using pdf to vwx conversion scaling software to 0.2% accuracy with datum dimensions taken from the existing building)

Based on the B&PE consultants calculation ratios in section 6.2.1 - 6.2.2 it would appear that an area for wastewater irrigation for the 17 dwelling occupied by 2 persons per dwellings proposed in this new application would require an area of less than a quarter of the proposed 3150sqm area shown on the site plan for public comment.

A 3150 sqm irrigation area based on the B&PE data would indicate that 144 people could be accommodated on site with regard to effluent disposal. Even if additional irrigation area is required over the 2400sqm the proposed population number could be at least triple what is being proposed. This suggest that the applicant has considered future site expansion exceeding the population and dwelling numbers contained in this application for public comment and subsequent approval by council.

It would appear that we are commenting on a proposal with insufficient or inaccurate information that could result in an open ended approval for future development of the site.

3. Wastewater treatment and Effluent disposal irrigation area.

The 1.1000 scale site plan circulated for public comment shows a 3150sqm effluent disposal irrigation area at the lower end of the site adjacent the Helena River floodplain. The site falls approximately 18m from Clayton road end of the site to the irrigation area with a 10/1 slope ratio. There is approximately 3.2 ha of uphill surface and subsurface groundwater catchment area above the irrigation area not including the subsurface water generated from the Boya ridge directly above the development. There is no reference in the documentation of how the proponent intends to address the stormwater or subsurface water issues on the site. Item 6.5 in the 2017 application only states that a ***A Plan will be undertaken.***

The proposed irrigation area shown on the public comment documentation is orientated along the natural contours and spans approx 140 linear metre across the lower end of the site. It extends across most of the site area abutting the Helena River and effectively acts as a earth dam to waterflow down the site. Together with the spray irrigation of waste water, surface and subsurface water flow, inundation at the lower end of the site during winter months, porous soils and an underlying granite rock structure this proposal could cause catastrophic damage to the river environmental and adjoining properties both adjacent to the site and downstream. During summer months easterly valley Thermal and Catabatic wind speeds regularly exceeding 40kph. A surface spray irrigation system could create serious problems for both the river environment, the adjacent properties and the occupants of the contemplation garden/orchard. Food production is prohibited in and near wastewater irrigation areas. None of these issues seem to be addressed by the consultants.

To avoid any possible contamination of the Helena River why hasn't the irrigation system been placed further up the site and why is it more than four times the area required for 34 people? Is this location therefore part of a future development option? If the documentation is incorrect then why was it distributed for public comment?

4. Building design and code requirements

The proposed development indicates ancillary facilities including a common room, communal kitchen, dining laundry, swimming pool and external toilet and showers. I would assume that as this is a public space a Public Building classification should be applicable. The dining room is insufficient in area to cater for 31 people. (The occupant in unit 6 won't be able to access the facility anyway) If meals are to be prepared and served a kitchen to commercial standards would be required. The kitchen shown would be inadequate.

5. Accessible unit

Unit number 6 is labelled as an accessible unit. External access from this unit to communal areas does not comply with either Access to Premises Standards or the AS1428 Design for Access and Mobility. There is no accessible pathway access to the communal facility or

swimming pool. Stairways block access from all directions to both the common room kitchen/dining facility and toilets. The ramp indicated on the 1.200 floor plan is illegal as it has a 1 in 8 slope and not the required 1 in 14 over a maximum of 9 metres in length according to the AS1428 regulations.

No adequate design considerations have been given to disabled access from unit 6. The addition of this unit appears to be an add-on to convince Council it is addressing disability requirements. Not !!!!

6. Other projects like this within MSC

I am not aware of any residential projects that are the same as this proposal within the Mundaring Shire or indeed any other adjacent hills shire councils. This proposal seems to be utilizing some creative accounting or perhaps creative planning to work its way around definitions of residential buildings in the TPS4 scheme text.

7. Precedent for RR2

The adjoining landowners have already endorsed the RR2 zoning in this area in previous public comments via the HVUES to preserve the semi rural landscape and the areas distinct scenic value.

This proposal sets a precedent in the RR2 zoning for both current and future development and is inappropriate for the area. While I have no objections to the site being developed in accordance with the RR2 concept ie. (retention of similar housing densities and preservation of natural environment) this proposal effectively introduces a population eight times the density of adjoining residential lots. The site could be developed with two or three individual lots and family houses with reasonable profit to the developer complimenting the existing zoning while bring additional families into this semi rural area.

8. Traffic

MSC Planning Department have suggested 10 vehicle movements per dwelling x two people a day per. This suggests 170 vehicle movements a day and introduces serious traffic safety issues to Clayton Road especially as the access point from Fyfe Street onto Clayton is on the crest of a hill. The impact on the surrounding community will also be affected with congestion, safety and noise issues.

9. Acoustic environment

The documentation makes no reference to the noise effect of an increased population and 170 vehicle movements per day on this site.

The Boya ridge immediately north east of this development combined with the ridge line on the southern side of the Helena River produces a unique acoustic environmental effect due to the topography. Sound is significantly amplified within and across the valley landscape. The human voice can be clearly detected up to 600m from locations on the southern side of the valley, generated from the northern side in the Clayton Road area and beyond. An additional 34 residents and their associated vehicles will have a significant detrimental effect on this unique semi rural environment.

10. Adaptive reuse

I see no reason to accept a much high residential density proposals partly based on its potential for the adaptive reuse of existing buildings. Having been involved as an architect on numerous AR projects in the past 20 years I would suggest that the cost of refurbishment for these derelict buildings and upgrading them to NCC and BCA standards will probably be close to new building costs. The existing buildings suggested for reuse are of limited architectural value and have no heritage significance.

Michael Ipkendanz Architect
17th October 2019