

Public Open Space Strategy

Schedule of Submissions

No/	Date	Name	Address	Summary of Comments Made	Officer Response	Officer Recommendation
Ref	Received					
1	14 March 2019	Wendy	No address provided	Issue/Comment Maintenance at Shay gap park is needed as infrastructure is in poor condition. Skate park location should have been located elsewhere and shade needs to be provided.	Officer Response Noted. The Strategy will categorise Shay Gap and assist in determining the required maintenance and service levels for this POS. The Strategy also contains specific recommendations for Shay Gap for the Town to act upon – including replacement of certain infrastructure.	Officer Recommendation No modifications required.
2	15 March 2019	Russel Smith	No address provided	Issue/Comment The width of dual use pathways should be widened. Paths should be provided to transient workforce camps.	Officer Response Noted. The Strategy originally was to address "parks and paths" however the "path" component of the strategy was removed from the scope, and will be addressed as a separate document.	Officer Recommendation Reference to paths removed from strategy – to be addressed separately.
3	13 May 2019	Department of Health	PO Box 8172 Perth Business Centre WA 6849	Issue/Comment The Strategy should include additional design elements, including: • A range of quality public open spaces (POS) should be provided. POS should be within walking distance to most residents along well lit, connected routes. The POS should be co-located with community facilities to encourage pedestrian forms of transportation. • The design of POS should include adequate shade that is spaced along pathways to reduce heat stress.	Officer Response Agreed. The Strategy details the POS should be distributed in order to service the community, and different size POS will have different purposes.	Officer Recommendation. No modifications required.

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Ref	Received			Water fountains and other infrastructure that alleviates heats stress should be provided to encourage physical activity. Department of Health attachment provided Evidence supporting the creation of environments that encourage healthy active living.		
4	11 April 2019	Department of Mines, Industry Regulation and Safety	100 Plain Street East Perth WA 6004	Issue/Comment No issues / concerns raised.	Officer Response. Noted.	Officer Recommendation No. 2.1 No modifications required.
5	29 April 2019	Department of Planning, Lands and Heritage	140 William Street, Perth WA 6000	Issue/Comment No. 1 The draft Strategy fails to adequately address many of the key principles, objectives and policy measures the Western Australian Planning Commission's State planning policy framework. DPLH has concerns about the methodology used by the draft Strategy for calculating the amount of existing public open space in the localities of Port Hedland and South Hedland. The draft Strategy's depiction and analysis of "walkable catchments", and its inclusion of foreshore reserves, drainage reserves, and restricted open space within calculations for the purpose of determining the amount of public open space within various localities, represents a significant departure from the relevant State planning policy framework. The draft Strategy's alternative methodology results in a vastly different outcome from the Town's endorsed local planning strategy, and DPLH assessment, which form the view that the Town of Port Hedland as a whole, though	Officer Response No. 1 Agreed. DPLH provided a comprehensive submission on the draft version of the Strategy. The Town and UDLA have considered the submission and have addressed the comments through required modifications to the Strategy. As a key intention for the Strategy is to form an appendix to the Local Planning Strategy (once it is reviewed and updated), it is important the Strategy meets statutory requirements of DPLH.	Officer Recommendation 1 The Strategy has been amended to incorporate the comments made through the DPLH submission on the draft Strategy.

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				particularly South Hedland, has an undersupply of public open space as well as an issue with the quality of the existing public open space.		
				The draft Strategy provides no cogent reason for its departure from the relevant State planning policy framework, which has flow-on effects throughout the document.		
				While the draft Strategy does not assert to be a land use planning document, basing public open space calculations on a framework that departs from the State planning policy framework would be inadvisable and is likely to result in reduced public amenity for residents of the Town of Port Hedland.		
				For the above reasons, DPLH recommends that the draft Strategy should not proceed to finalisation, nor should the draft Strategy inform the Town's review of its local planning framework, until such time as the above matters are addressed.		
				Issue/Comment No. 2 Edits recommended for Executive Summary	Officer Response No. 2 Noted.	Officer Recommendation No. 2
				Provide citations. Flawed methodology used to reach		Modifications made to Strategy.
				conclusions. Cite reference/framework against the assessment of walkable catchments.		
				Issue/Comment No. 3 Edits recommended for Background	Officer Response No. 3 Noted.	Officer Recommendation 3 Modifications made to Strategy.

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Kei	Received			Background chapter to include statutory and policy context. Define public open space.		
				Detail the framework employed by the draft Strategy.		
				Detail the methodology of the POS site audit.		
				Detail the methodology of the investigation.		
					Officer Response No. 4	Officer Recommendation 4
				Issue/Comment No. 4	Noted.	Modifications made to Strategy.
				Edits recommended for Strategic Goals		
				Reword and clarify.		
				Issue/Comment No. 5	Officer Response No. 5	Officer Recommendation 5
				Edits recommended for Importance of Public Open Space	Noted.	Modifications made to Strategy.
				Re-write to refer to the principles, terms and requirements of "accessibility" to POS as set out within Liveable Neighbourhoods		
					Officer Response No. 6	Officer Recommendation 6
				Issue/Comment No. 6	Noted.	Modifications made to Strategy.
				Edits recommended for Active Transport		meameane made to enalogy.
				Second paragraph – remove bullet point from "A quality path network should:"		
						Officer Recommendation No. 7
				Issue/Comment No. 7	Officer Response No. 7	Modifications made to Strategy.
				Edits recommended for Study Extents	Noted.	
				Should divide the study extent into suburb-based localities.		
					Officer Response No. 8	Officer Recommendation No. 8
				Issue/Comment No. 8	Noted.	Modifications made to Strategy.

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				Edits recommended for Review of Background Documents		
				This section should summarise the key objectives, strategies, actions, and recommendations of each document reviewed in the development of the draft Strategy.		
				Consider the DLGSCI Public Open Space Strategy Guide for Local Governments.		
				Issue/Comment No. 9	Officer Response No. 9	Officer Recommendation No. 9
				Edits recommended for Regional Variation	Noted.	Modifications made to Strategy.
				This section needs further details to provide the statutory and strategic planning framework from which "variation" is being sought and cogent rationale for the "regional variations" being sought.		
				The Strategy continues to use a flawed methodology in its discussion of public open space in this section to reach its conclusions.		
				Issue/Comment No. 10	Officer Response No. 10	Officer Recommendation No. 10
				Edits recommended for POS Hierarchy (Port and South Hedland)	Noted.	Modifications made to Strategy.
				The draft Strategy's review of existing public open space needs to be significantly modified to provide analysis against the specific requirements under the State policy framework. The review of existing POS also needs to consider the quantity and quality of existing recreational development on each site, tenure and zoning/reservation under local planning scheme.		
				Under the relevant State planning policy framework, the Spoil Bank, Pretty Pool		

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Kei	Received			reserve, coastal foreshore reserves; drainage swales and restricted open space are not suitable for inclusion within calculations for the purpose of determining the amount of public open space within the Port Hedland townsite locality.		
				As for the analysis of Port Hedland POS (above), under the relevant State planning policy framework, drainage swales and restricted open space (i.e. South Hedland Aquatic Centre, Marquee Park, school sites, Wanankura Stadium) are not suitable for inclusion within calculations for the purpose of determining the amount of public open space within the South Hedland townsite locality.		
				This section should provide for each POS site/facility.		
				Issue/Comment No. 11	Officer Response No. 11	Officer Recommendation No. 11
				Edits recommended for Existing POS Function	Noted.	Modifications made to Strategy.
				Consolidate into the recommended POS audit		
				Issue/Comment No. 12	Officer Response No. 12	Officer Recommendation No. 12
				Edits recommended for Current POS Analysis	Noted.	Modifications made to Strategy.
				Should divide the study extent into suburb-based localities		
				Issue/Comment No. 13		
				Edits recommended for Overall Quantity Target	Officer Response No. 13 Noted.	Officer Recommendation No. 13 Modifications made to Strategy.
				Review / rewrite this section - to correctly refer to the "normal requirement".		

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				Issue/Comment No. 14		
				Edits recommended for POS Function	Officer Response No. 14	Officer Recommendation No. 14
				Review / rewrite these sections. Address the comments regarding the findings of community engagement for the Strategic Community Plan 2018 – 2028.	Noted.	Modifications made to Strategy.
				Analysis of "sporting spaces" should be undertaken as part of this draft Strategy – or at least, the draft Strategy should test and update the assumptions and findings of the Town of Port Hedland Active Open Space Strategy (CCS Strategic, 2011) and the Pilbara's Port City Growth Plan (ToPH 2012) which provide the benchmark local planning framework for active open space. Table 1 – POS Area Analysis is incomplete.		
				Issue/Comment No. 15 Edits recommended for POS Heirarchy and Walkable Catchments Delete the "as the crow flies" approach in the depiction and analysis of "walkable catchments", and align the analysis with the characterisation of true walkable catchments.	Officer Response No. 15 Noted.	Officer Recommendation No. 15 Modifications made to Strategy.
				Issue/Comment No. 16 Edits recommended for Neighbourhood and District Catchments, South Hedland, Path Connections, Future of POS, POS under Potential Growth Scenarios and Funding Opportunities	Officer Response No. 16 Noted.	Officer Recommendation 16 Modifications made to Strategy.

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				Review to address the division of the study extent into suburb-based localities to form the basis of analysis against the normal requirement for a minimum contribution of 10 percent of the gross subdivisible area be given up free of cost by the subdivider and vested in the Crown as a Reserve for Recreation.		
				Delete the "as the crow flies" approach in the depiction and analysis of "walkable catchments", and align the analysis with the characterisation of true walkable catchments that account for road, path networks and major barriers.		
				Review / rewrite this subsection to discuss the historic use of drainage swales for recreation purposes. Provide an analysis/response to the discussion by LandCorp's Pilbara Vernacular.		
				Provide a cogent discussion and rationale for the inclusion of drainage swales within calculations for the purpose of determining the amount of public open space within the Port Hedland and South Hedland townsite localities, if that is the intent of the draft Strategy.		
				Review the local population trends and issues – demographics, recreation trends – identified in the WAPC's 2019 Land Supply Analysis for Port Hedland		
				Review to address the accurate characterisation of the findings from community engagement for the Strategic Community Plan 2018 – 2028.		
				Update references to the former Town Planning and Development Act 1928 to refer to the Planning and Development Act 2005, and the relevant State Planning Framework.		
				Provide greater focus (and expand upon) discussion of implementation of the recommendations from the draft Strategy.		

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				Expand in the description of lots proposed for disposal, include them in the POS audit under subsection 5.2 of the draft Strategy.		