



South Perth Activity Centre Plan Engagement Overview

22 November 2019



The draft South Perth Activity Centre Plan (draft ACP), proposed Town Planning Scheme Amendment No. 61 (proposed Amendment No. 61) and proposed Local Planning Policy P321: South Perth Activity Centre Competitive Design Policy (proposed policy P321) have been prepared to set out the long term strategic vision and the statutory planning requirements for development in the South Perth area over the next 10 years.

The City sought feedback via public consultation undertaken between May and August 2019 through an extensive consultation program, described and reported in three detailed reports:

- Engagement Summary
- Stakeholder Reference Group Summary
- Community Panel Summary

These reports are available at <https://southperth.wa.gov.au/development/planning-projects/south-perth-activity-centre-plan> or by contacting the City of South Perth.

This report provides an overview of the outcomes of the stakeholder and community engagement, including where modifications to the draft ACP and proposed Amendment No. 61 documents are recommended to be investigated and will help inform the finalisation of the draft ACP and proposed Amendment No 61.

Preamble

The City received a very good response during the public consultation period and the submissions provide a deeper understanding of the views of stakeholders and community members, as well as a large number of suggestions to refine and improve the advertised draft ACP and proposed Amendment No. 61.

In analysing the engagement outcomes it is important to note that the draft ACP aims to manage higher density and activity in the area, to cater for expected population growth and provide more services and business opportunities. Increased height and density will need to be allowed through the planning framework, and should be managed to support of a clear vision for the area.

There was sentiment from people in the local community that early examples of redevelopment have not lived up to their expectation or the promise suggested by previous planning frameworks. While the new buildings have not always resulted in a sensitive ground-plane, it may be noted that the dwellings within are well enjoyed by the people who live there. Older examples of high-rise in South Perth have likewise produced an enjoyable living environment for residents but have not necessarily been sensitive to pre-existing development, and this has happened over several decades of development of the area.

Many issues and concerns were raised during the public engagement period that are general in nature and/or are beyond the scope of the draft ACP and proposed Amendment No. 61. Some feedback received reflected a concern that wholesale change to the area is imminent, which is not accurate but is nevertheless a consistent fear from many submitters.

The draft ACP and proposed Amendment No. 61 documents will be modified and improved following consideration of the large number of specific modifications suggested through the public consultation period.

This summary report acknowledges the concerns and apprehension of some community members towards the draft ACP and its intent, while also recognising that the draft ACP aims to create a logical framework for progressing the urban development of the area in line with the vision developed by the City over a number of years.

The feedback and level of interest shown through the public consultation process demonstrates that the community needs to continue to be part of this journey. Provision of information about development applications, ongoing public benefit outcomes and progressive take-up of mode shift to sustainable transport types, for example, will help to support the community as change occurs. Increased density and population growth will continue to occur in the draft ACP area and the wider Perth metropolitan area; accordingly the City of South Perth needs to take a proactive approach and plan for the future of this area.

Purpose of Consultation and Engagement

The City has undertaken a comprehensive process to ensure that the draft ACP and proposed Amendment No. 61 provide a robust and evidence-based planning framework, informed by feedback from stakeholders at each stage. The purpose of the consultation and engagement process undertaken between May and August 2019 was threefold:

1. for the City to gain a deeper understanding of stakeholder and community views and concerns;
2. to provide an opportunity for stakeholders and community members to contribute to the decision making; and
3. to identify elements of the draft plans that could be improved.

Consultation and Engagement Methods

The draft ACP and proposed Amendment No. 61 were widely advertised and a large amount of information was available in a range of formats to encourage and inform feedback from stakeholders and members of the community. Between May and July 2019 the City sought comment and input by written feedback and through a series of online feedback forms on the Your Say South Perth online engagement platform (<https://yoursay.southperth.wa.gov.au/>).

In addition, workshops were held in July and August 2019 with a

Stakeholder Reference Group and a Community Panel made up of a diverse group of community members to review the draft documents with a focus on issues that emerged as areas requiring further consideration through the written feedback.

Communications and advertising

The engagement process was widely advertised through various channels including:

- Media releases (May and June 2019);
- Letters to all landowners and residents within the ACP area and within approximately 150m of the ACP area boundary (approximately 3,600 letters);
- Direct emails to community members who had previously registered interest for any City planning project within the area (approximately 340 recipients);
- Articles in the City's fortnightly E-newsletter;
- Articles in the Peninsula Magazine (distribution of 24,000);
- Full page advertisements in the Southern Gazette (Peninsula Snapshot);
- Social media posts across Facebook, Instagram, Twitter and LinkedIn, including paid posts;
- Posters and postcards displayed and distributed at City buildings and businesses within the ACP area; and
- Mailed invitations to express interest in participating in the Community Panel (7,000 letters).

In total approximately 64,000 people were reached by the various social, online and hard copy communication channels.

City staff were available in person and by telephone throughout the public consultation period to discuss the plans. Questions could also be submitted online via a dedicated tool on the Your Say South Perth page.

Four drop-in sessions were held at different times and locations during the public comment period with City officers and consultants available to answer questions and provide information. A total of approximately 65 people attended the drop-in sessions.

Written submissions

More than 3,000 individuals visited the project page on the Your Say South Perth website and more than 2,500 documents were downloaded, resulting in more than 900 individual participants becoming informed about the project.

In total 225 individual written submissions were received by the City during the public engagement period, along with over 500 pro-forma submissions focused on a particular site.

Stakeholder Reference Group and Community Panel

The South Perth Station Precinct Stakeholder Reference Group (SRG) was established in 2017 and is made up of 17 members representing a diverse range of stakeholders with interests in the ACP area. The SRG has been involved at a number of points through the preparation of the draft ACP and Amendment No. 61.

A separate Community Panel was established for this public engagement process to discuss the question 'What improvements could we make to the guiding framework for the development of the South Perth Activity Centre now and into the future?'

The Community Panel brought together a group of 42 people selected via a random process to reflect the makeup of the broader community.

Two full day workshops were held with both the SRG and Community Panel to review and provide recommendations for improvements to the draft documents.

The workshops for both groups focused on the key themes that came from the written submissions and were specifically designed to examine and deliberate over potential responses to the key themes (i.e. improvements that could be made).

Consultation Outcomes

A large number of themes emerged from the written submissions, with the most significant themes being **'height (of towers)', 'setbacks (of podiums)', 'shadowing', 'land use', 'plot ratio'** and **'miscellaneous'** concerns. These themes are discussed further below. However, the general nature of the feedback received is described as follows:

- The feedback was highly varied, with limited consistency between views (both positive and negative) on the elements and outcomes that would result from the implementation of the draft ACP and proposed Amendment No. 61;
- A large number of modifications were suggested, with most of these modifications relating to particular outcomes that would occur on specific sites. The majority of submissions did not challenge the underlying assumptions that informed the preparation of the draft ACP or the outcomes expected as a result of implementation of the plan; and
- A range of submissions suggested modifications and/or raised concerns with elements of the plan that were already addressed by the plan, or arose from a misunderstanding of the controls in the draft ACP and proposed Amendment No. 61.

Height of Towers

Written feedback received regarding building height illustrated the wide and varied expectations within the community. The most common feedback was a general preference for no increase in height, or for limited increases in height. However, fundamentally the ACP aims to manage higher density and activity in the area to cater for expected population growth and provide more services and business opportunities. Increased height and density will therefore need to be allowed.

There was a common misconception implied in some submissions that existing development is the 'limit' of what is able to be built under the existing town planning scheme. However a significant amount of change is already possible under the existing town planning scheme, and very large buildings are currently able to be built in some areas.

It was apparent that the building height limits, expressed in metres rather than storeys, created some confusion as to the potential maximum heights of buildings throughout the ACP area. The graphically faint nature of the 'Tier 2 Additional Development Potential Available' line on Map 2 in the Amendment No. 61 document also raised concerns.

The combination of a preference for limited building height increases, a misunderstanding of the existing building height limits in Town Planning Scheme No. 6, and confusion about the advertised building height limits in a number of locations, resulted in a generally negative response to the proposed building heights. However, a relatively small number of suggested improvements were submitted.

The SRG and Community Panel workshops discussed building height limits across the ACP area, informed by the advertised building height

limits and requirements for towers, including setback and floorplate area limits, and the location of the Tier 2 Additional Development Potential area.

Once presented with detailed information and provided with adequate time and information to suggest improvements, the majority of the SRG and Community Panel members indicated that the proposed heights were generally acceptable, subject to the design quality and built form limitations proposed by the draft ACP and Amendment No. 61.

There were two areas where feedback was highly consistent and included clear suggested modifications. Both were located in the area between Mends Street and Frasers Lane and comprised separate and large blocs of submissions with broadly opposing view-points:

1. Peninsula Apartments site

The written submissions specifically associated with the Peninsula Apartments location sought increased height because of the opportunity afforded by the location and size of the site. At present the site is developed, and the advertised building height limits provide some increased height potential at the rear of the site consistent with the overall structure of building height limits, which step down progressively away from the centre of the ACP area.

A number of potential options for this site were explored through the SRG and Community Panel workshops and neither group recommended increasing building height limits beyond what was advertised.

This site may need to be the subject of a detailed planning exercise in the future to address the potential impacts of a large development on this site; however, the advertised building height limits provide a balance by facilitating development consistent with the broader structure of height limits in the area.

2. Medium typology area of South Perth Esplanade

The second major bloc of written submissions regarding building height limits sought reductions in height on South Perth Esplanade, specifically associated with the preservation of views from the existing Aurelia and Reva developments on Harper Terrace. This feedback seeks to limit potential building height to the north of the existing apartment buildings in order to protect the views from apartments in the lower levels of these buildings.

In considering any potential changes to the advertised building height limits in this area it will be important to also consider the ACP objective to focus density and activity within walking distance of public transport, in this case the Mends Street ferry terminal. It must also consider the existing town planning scheme requirements for the subject properties, which provide substantial development potential.

Neither the SRG nor the Community Panel recommended reducing the extent of Medium typology for properties fronting South Perth Esplanade.

Suggested Modifications

Suggested changes to the advertised building height limits that are recommended to be investigated further include:

- Reduce the typology for properties on Mill Point Road in the Mill Point character area;
- Increase the typology in some parts of the Hillside character area where larger buildings are appropriate; and
- Improve the legibility of maps and tables to make interpretation of building height limits easier.

Setback of Podiums

Written feedback received regarding podiums indicated substantial concerns about podium setbacks. However, it was apparent that many respondents did not fully understand the podium requirements, with a number of comments objecting to street, side and rear setbacks requirements that were not proposed.

Concerns were raised about the impact of the setback controls on small lots, with feedback indicating that side setback requirements would impact the development potential of smaller lots.

The SRG and Community Panel examined and discussed the proposed podium height and setback provisions. Once podium height and podium setback requirements were well understood, the majority of the SRG and Community Panel indicated that the proposed podium requirements were acceptable, subject to the design quality and built form limitations proposed by the draft ACP and proposed Amendment No. 61.

Both the SRG and Community Panel made recommendations for flexible podium setback requirements to respond better to the adjacent development, rather than stringent controls. The flexibility suggested by the SRG and Community Panel would also mitigate concerns raised about the impact of the draft ACP and proposed Amendment No. 61 requirements on small lots.

Suggested Modifications

Suggested changes to the advertised setbacks requirements that are recommended to be investigated further include:

- Support flexibility for side and rear setbacks to respond to the site specific context; and
- Improve the legibility of maps and tables and use the term 'base' rather than 'podium' to make interpretation of the requirements easier.

Overshadowing

Written submissions identified over shadowing of nearby properties and of the Perth Zoo as a concern. This was also reflected at the SRG and Community Panel.

Respondents expressed a concern that the advertised draft ACP only requires overshadowing of adjoining lots to be considered.

Suggestions for improvement include measuring overshadowing of all properties, rather than only adjacent properties, and ensuring that shadowing over Perth Zoo is limited to a very low level. Both the SRG and Panel suggested lower building height limits for properties on Labouchere Road that could potentially overshadow the Perth Zoo.

Suggested Modifications

Suggested changes to the advertised draft ACP and proposed Amendment 61 that are recommended to be investigated further include:

- Apply overshadowing requirements to all properties, rather than only those adjoining the development site; and
- Add requirements to limit the potential impact of overshadowing of the Perth Zoo.

Land Use

Written submissions recommended that some land uses should be more flexible, with short stay accommodation, serviced apartments and aged care a particular focus.

Suggested Modifications

Suggested changes to the advertised land use permissibility that are recommended to be investigated further include:

- Allow discretionary development of 'Serviced Apartment' and 'Hotel' in the Mill Point character area.

Plot Ratio

Written feedback on plot ratio typically focussed on concerns about the plot ratio controls inhibiting high quality development.

A number of written submissions and some discussion at the SRG suggested that the plot ratio limits are an unnecessary additional control. The inclusion of above ground car parking in plot ratio was noted as a concern due to the potential to either limit development of some sites or incentivise car parking to be located in basements.

A small number of submitters suggested a sliding scale of plot ratio to encourage a variety of building forms.

Some written feedback suggested that the required minimum commercial floorspace in Mends and Richardson character areas would result in vacant commercial tenancies during times when there is limited demand for non-residential development.

Once presented with detailed information and provided with adequate time and information to suggest improvements, the majority of the SRG and Community Panel members indicated that the plot ratio limits were appropriate and that the inclusion of above ground car parking in plot ratio would encourage better design outcomes.

Suggested Modifications.

Suggested changes to the advertised plot ratio requirements that are recommended to be investigated further include:

- Flexibility for commercial floorspace, to enable residential land uses in the short term provided that floor space is designed to be adaptable for non-residential use in the future.

Miscellaneous Concerns

A large number of written submissions addressed issues which could be described as likely to occur regardless of the draft ACP and which the draft ACP seeks to mitigate in some way, or which are important principles of the ACP if it is to deliver on the community's expectations and the vision for the area.

Population Growth/Targets

A number of written submissions expressed concern about the population forecasts that inform the draft ACP.

Fundamentally the ACP aims to manage higher density and activity in the area to cater for expected population growth and provide more services and business opportunities. Extensive research was undertaken to understand the likely growth of the area and this has been reflected in the draft ACP and proposed Amendment No. 61 so that the type of growth that occurs will be managed in line with the community's expectations and in support of the ACP vision.

This basic principle was communicated at both the SRG and Community Panel workshops. Whilst the scale of development was of concern to some members of the SRG and Community Panel, both groups acknowledged that a robust long term vision is needed in order to manage growth and development.

Traffic and Parking

Written submissions reflected the community's concern over shortages of parking and potential impacts of traffic congestion, which was also discussed at the SRG and Community Panel workshops.

Notwithstanding, in both written submissions and at the SRG and Community Panel workshops, there was a recognition that new

development closer to the South Perth and CBD employment centres would help to encourage a transition to public transport and walking/cycling.

Many participants urged the City to advocate progressively for the development of the train station, increased ferry services and stops, bus services, and much improved pedestrian and cyclist facilities.

Design Quality

Written feedback regarding design quality expressed concern over the achievability of the design quality expectations in the draft ACP and proposed Amendment No. 61. Many submissions, and discussions at the SRG and Community Panel workshops, indicated that high quality design is imperative to achieve the objectives of the plan.

When presented with the multi-layered framework to deliver design quality the SRG and Community Panel generally endorsed the approach, noting that delivered outcomes would be critically assessed.

Some written feedback suggested that the requirement to undertake a design competition is an unnecessary cost with limited benefit. However, deliberation through the SRG and Community Panel workshops generally endorsed the advertised approach.

Suggested Modifications

There are no suggested modifications to the advertised population targets, traffic and parking, or design quality requirements that are recommended to be investigated further. Notwithstanding, it is recommended that the City consider making information about development applications, public benefit outcomes and progressive take-up of mode shift to sustainable transport types available through regular feedback mechanisms.

General Observations

Whilst a number of modifications have been suggested, significant changes to the form and function of the draft ACP and proposed Amendment No. 61 are not recommended based on the outcomes of public consultation. This reflects the conflicting nature of many of the suggested modifications received through the written submissions, and it also reflects the fundamental need for an appropriate framework to be developed for the long term future of the ACP area.

This also reflects the relatively narrow field of recommendations made by the SRG and the Community Panel when detailed information and clarification was provided to inform discussion of the advertised draft documents.

In general, the feedback received is generally reflective of the thorough nature of the work done in preparing the draft ACP and proposed Amendment No. 61. In particular, the support for the design quality requirements indicated that the draft documents are largely aligned with the community's expectation, albeit that the potential scale of development may be daunting for some.

The recommended modifications are largely intended to clarify parts of the draft documents, which are quite complex, and ensure that the planning requirements are as clear as possible and provide an appropriate level of certainty for existing residents and proposed developments.

Recognising that the community continues to express concern over the potential outcomes of the draft ACP and proposed Amendment No. 61 and the impact on their continued enjoyment of the place, it is also recommended that the City maintain communications through the various media channels, and that a regular 'ACP update' become a platform for communication with the community.

