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# South Perth Activity Centre Plan Engagement Summary

November 2019



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## **DISCLAIMER**

This document is provided in good faith and represents a detailed analysis and breakdown of the engagement received from many stakeholders regarding the advertising of the draft South Perth Activity Centre and the proposed Town Planning Scheme Amendment No. 61. We acknowledge the possibility that we may have misinterpreted some of the submissions and that there may be some errors and omissions.

## **ACKNOWLEDGMENTS**

Shape Urban acknowledges the Whadjuk people of the Noongar Nation as traditional custodians of the land on which we work. We recognise their cultural heritage, beliefs and relationship to the land, which continue to be important to Noongar people today. We pay our respects to Elders past, present and future.

We would also like to acknowledge the Stakeholder Reference Group and the Community Panel participants for their extensive time commitment on this project.

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# 1. Introduction

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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 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.

In this Report, the draft ACP, proposed Amendment No. 61 and proposed P321 are collectively referred to as the 'draft documents'.

The draft documents provide a detailed planning framework to guide movement and access, land use and built form within the activity centre. Together, they will shape the development of the area to accommodate projected and required growth to ensure a functioning, sustainable and viable activity centre.

The City sought comment and input through a series of online feedback forms and Q&A on the Your Say South Perth online engagement platform, as well as community drop-in information sessions. The preliminary engagement process was undertaken between May 2019 and July 2019.

Information sessions were held at the John McGrath Pavilion (May 22), South Perth Bowling Club (08 June and 19 June) and City of South Perth Civic Centre on 06 July 2019.

The engagement components were thoroughly publicised on the City's website, Your Say South Perth, via links to the website on Facebook, via direct emails and letter as well as through printed materials available at the Civic Centre and South Perth and Manning Libraries.

The Your Say South Perth website contained the information about the South Perth Activity Centre Plan process, the online feedback forms, and information about times, locations and registration for the information sessions.

More than **3000** individuals visited the project page on the Your Say South Perth website and more than **2500** documents were downloaded, resulting in more than **900** individual participants becoming informed about the project).

659 individuals provided feedback via online feedback forms including 551 template (proforma) submissions, and 150 direct submissions via email, mail or hard copy.

## 1.1 Communications Activities

The engagement period was widely advertised through various channels as follows:

- Media releases (May and June)
- Letters to all landowners and residents within the ACP area and within approximately 150m of the ACP area boundary
- 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



In addition, some **7,000** residents, business and property owners in the area were mailed directly to advise of the opportunity to be involved in a Community Panel.

Table 1 provides a full summary of engagement numbers.

**Table 1 - Engagement Activity Summary Numbers**

<b>Engagement</b>	<b>Number</b>
Your Say South Perth Website South Perth Activity Centre Plan project page visits	3000
South Perth Activity Centre Plan documents downloaded	2500
Individual participants downloading documents	900
Media releases	2
Letters to landowners and residents within the area	~3,600
Direct email to all registered participants	4
E-new letter articles	5
Articles in the Peninsula Magazine	2
Advertisements in the South Gazette (Peninsula Snapshot)	2
Facebook Posts	13
Paid Facebook advertising	2
Instagram posts	3
Twitter posts	5
LinkedIn post	1
Invitations to the Community Panel	7,000
<b>Total number of persons reached by the various social, online and hard copy channels</b>	<b>~64,000</b>

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## 1.2 Drop-in information sessions

Four 'Drop-In Information Sessions' were held at various locations in proximity to the activity centre area. The sessions were held at:

- John McGrath Pavilion on Wednesday, May 22, 2019;
- South Perth Bowling Club on Saturday, 08 June, 2019 and on Wednesday 19 June 2019;
- City of South Perth Civic Centre on Saturday 06 July 2019.

The drop-in information sessions provided an informal opportunity for community members to ask questions, make observations and provide feedback about the draft ACP and Amendment No. 61.

Each session comprised significant presentation material that described both the background to the study and information about key elements of the documentation.

Approximately 65 people attended these sessions.

## 1.3 Workshops

### 1.3.1 Reference Group

The South Perth Station Precinct Reference Group (SRG) was formed in August 2017 and have been involved throughout the development of the draft ACP and proposed Amendment No. 61. The Group consists of representatives from the following categories:

- Community Groups
- Business Owners
- Resident/Ratepayers
- Development Industry
- Perth Zoo
- Sport/leisure clubs
- South Perth Historical Society

As the SRG has been involved at a number of points through the preparation of the draft ACP and proposed Amendment No. 61 their feedback was important to help inform the finalisation of the draft documents.

Two workshops were held with members of the SRG. These workshops were held on Wednesday 03 July 2019 and Friday 02 August 2019, and outcomes are summarised in Section 7.

### 1.3.2 Community Panel

The Community Panel (the Panel) was the final activity of the engagement process, providing an opportunity for a selection of the community to provide responses and recommendations to the City and the WAPC that align with the broader community aspirations.

Selection of the Panel was via a random selection process. All of the households within the ACP area and a random selection of households in the South Perth Local Government Area were sent invitations by mail and invited to register their interest in attending. 7,000 individual households received an invitation.

The final selection goals were based on age, gender and land ownership goals which reflected the South Perth post code demographic and the study area (from the latest census data).

A total of 44 participants were selected and 42 panellists completed the two-day Community Panel.

The Panel sessions were held at the City of South Perth Civic Centre over two days - Saturday 27 July 2019 and Saturday 03 August 2019. The outcomes are summarised in Section 8.

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## 1.4 Submissions received

More than 3,000 individuals visited the project website or reviewed the available documents resulting in 108 individuals completing feedback forms, 150 written submissions and 551 proforma submissions.

A number of individuals provided multiple responses, with the total number of *individual parties* providing a submission being 235 plus 551 proforma submissions.

Eight of the 235 respondents provided no comment or opinion regarding the draft documents; these respondents were seeking to be included in the mailing list only. Thus, in total, this summary considers 225 *individual* submissions and the 551 proforma submissions.

The proforma submissions are site specific, and are summarised separately for this reason.

## 1.5 Purpose of this report

The purpose of this report is to summarise the stakeholder engagement process, including activities undertaken during consultation such as correspondence with stakeholders, information presented, and modes of engagement including online feedback forms and drop-in information sessions.

The report summarises the responses received to each of the phases of engagement. All individual email and mail submissions can be found in Appendix A and detailed summary of individual responses from the feedback forms can be found in Appendix B. All graphs associated with the feedback forms can be found in Appendix C.

## 2. Summary of General Feedback

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Whilst the feedback forms were made available online, a vast number of submissions were provided directly to the City via email, mail or hand delivery.

155 submissions were provided in a format that did not typically follow the template and instead provided the feedback of the submitter in their own format.

Each submission has been carefully analysed to understand the exact nature of the submission and to see if clear themes could be identified.

Some of the submitters made two or more submissions by also using the online feedback form feature (summarised in Section 3).

For ease of analysis submissions have been registered under individual names and combined where duplicates occur. There were also 551 proforma submissions which are considered in Section 4.

All of the individual comments are attached to this Report in full. Identifying features have been redacted for privacy reasons, and any reference to an individual has also been removed, unless the reference is known to be verifiable and fully available online. *Please Note: Submissions have not been edited and/or fact checked for the accuracy of statements and claims.*

The individual submissions range from one or two lines up to multiple pages, and as such the Appendix runs into the hundreds of pages.

This section of the report summarises the different aspects raised in the written and email submissions as well as the general and additional comments from the feedback forms.

To get a better understanding of the submissions and the issues, the basic concepts have been separated to explore the key locations, themes and threads.

The analysis categorised themes that were raised in the submissions and then collated the number of submissions that mentioned that theme. Most submissions covered more than one theme.

There are 225 submissions considered in this section, which combines the additional written feedback from the feedback forms with the submissions provided via email, letter and hand delivery. This section does not consider the proforma submissions which are considered in Section 4.

The number in the sub-section heading refers to the number of times an individual theme was raised.

### 2.1 Height (184)

Although height was the main issue raised and discussed during the submission period with just over 85% of respondents mentioning this in one form. Where mentioned, comments regarding height referred to specific areas (though varied) and was a mix of general support, support for some aspects, general opposition and opposition to some aspects.

In this section, references to 'Low', 'Low-Medium', 'Medium', 'Medium-High' and 'High' relate to the Building Height Limit table in Schedule 9B, Map 2 of proposed Amendment No. 61, shown in Figure 1.



HEIGHT TYPE		BUILDING HEIGHT LIMIT (PLOT RATIO LIMIT IN BRACKETS)		
		Base	Tier 1	Tier 2
	Low	14.4m (2.0)	17.5m (2.2)	Not Available
	Low - Medium	17.7m (2.5)	30.9m (2.8)	
	Medium	24.3m (4.0)	37.5m (4.8)	60.6m (5.5)
	Medium - High	37.5m (5.4)	57.3m (6.6)	90.3m (7.6)
	High	50.7m (7.2)	77.1m (8.8)	123.3m (9.8)
	Landmark Site	Refer Provision 5, Element 1 of Schedule 13		
 Activity Centre Plan & Character Areas Boundary				
 Tier 2 Additional Development Potential Available				

Figure 1 - Building Height Limits in proposed Amendment No. 61

### 2.1.1 Height – Supportive (56)

There were 56 individuals out of the total 225 (24%) that specifically supported an increase in height, no restriction to height or supported what was proposed in the draft ACP and proposed Amendment No. 61.

Some of the key comments either reflected what was proposed in the amendment or proposed a slight increase including:

- Harper Terrace (South Perth Esplanade end) remain Medium
- An increase in the 'Low' height type by 2 storeys
- Low-Medium for Peninsula instead of Low
- 8-10 storeys on South Perth Esplanade (Low-Medium type heights)
- Increase from 17.5m maximum to 25m maximum on South Perth Esplanade (slightly more than the Low-Medium type heights)

These categories all generally prefer the base height to be between 17.7m and 24.3m (Low-Medium or Medium).

The proposed Tier 1 heights would be between 30.9 and 37.5m. This equates to between five and eight stories in base height and between ten and twelve storeys for Tier 1.

#### Height in the Hillside Character Area (37)

There was significant acceptance of height in Hillside with many suggestions that height in this area would have limited impact on anyone else.

15 submissions suggested an increase to High which would allow significant height of 50.7m base through to 123.3m for Tier 2.

An acceptable maximum height proposed in 22 of the submissions was 60.6 metres, which would indicate support for Tier 2 opportunities throughout the area while retaining the Medium height limit. It is noted that many of these submissions were seeking the reduction of height close to the respondents location, and the suggestion may therefore be motivated by perceived personal advantage.

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### 2.1.2 Height – Not Supportive (127)

127 submissions (56%) did not support the draft ACP and proposed Amendment No. 61 with regard to height.

There was a range of subcategories within these submissions ranging from not wanting any change from the current scheme through to accepting heights in most areas but wanting a change on specific lots.

#### Heights on South Perth Esplanade (82)

Height along South Perth Esplanade between Harper Terrace and Frasers Lane was raised in various ways. When analysing the specific suggestions, several threads emerge;

- Keeping heights as they are (under the existing planning scheme).
- Protecting the views for those in buildings on Mill Point Road.
- Protecting the view of the peninsula from the river, the CBD and Kings Park.
- Protecting the investment of those who bought apartments expecting to have uninterrupted views.

Some 53 of these submissions (23% of total respondents) specifically referenced the protection of views for the buildings known as Aurelia and Reva as the reason for their lack of support of the draft documents.

#### Height in the Mill Point Character Area (60)

Although there were a wide range of views, there were some key points of commonality, with nearly 27% of all submissions indicating a preference for reduced heights in some location within the peninsula area, particularly on the waterfront edges.

These mainly referred to keeping the heights low on most of South Perth Esplanade. Some of the key statements include:

- 17.5m maximum height on South Perth Esplanade (Low)
- Light green (Low) extended to Mends (reducing Medium to Low)
- Reduction of height from 5 storeys to 4 storeys (Low-Medium to Low)
- Low height on all edges of the Peninsula (Medium or Low-Medium to Low)

These submissions prefer the heights to remain at 4-5 Storeys on the Peninsula frontages, which included heights along the western side of the Peninsula from Judd St north.

The actual height and requested locations for reduced heights has less agreement.

Reducing the height on Mill Point Road north of Ferry Street was suggested by 31 submissions. 10 of these suggested it be reduced to Medium, the other 21 suggested no increased height be allowed from current permissible development. Three submissions suggested removing the peninsula from the ACP altogether.

The main concept that seems to be agreed by all is the tiering of height from Mill Point Road to the waterfront edges.

#### Height in the Richardson Character Area (15)

A proportion (15) of submissions suggested lowering the heights along Labouchere Rd to Lyall Street to Medium-High.

#### Tier 2 (22)

Several suggestions were made about restricting the availability of Tier 2 to Central Mends (11) or removing the Tier 2 from Medium and Medium-High (11).



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### 2.1.3 Height – ‘Other’

#### Maximum Heights (23)

The theme of maximum height was raised by 23 submissions. 14 submissions specifically suggested no maximum heights. These numbers are included in the commentary under 2.1.1.

In contrast, submissions suggesting more stringent maximum heights were made ranging from suggestions of 9-10 storeys maximum (4 submissions) to between 18-20 storeys (5 submissions). These numbers are included in the commentary under 2.1.2.

#### Minor Reductions

There were a small number of respondents who suggested minor changes which would reduce the Medium-High to Medium, whilst generally supporting height.

#### Other Issues

Reference was also made occasionally (7) that South Perth is not the CBD or an extension of the CBD or that the plan allows for excessive height (18). This appears to relate to the height and bulk of buildings rather than intensity of retail or commercial. These numbers are included in the commentary under 2.1.2.

13 submissions made note that the measurement of height should be from 2.3m Australian Height Datum (AHD), whilst 14 submissions suggested that height should be measured from natural ground level, regardless of the AHD at that location. These numbers are included in the commentary under 2.1.2.

### 2.1.3 Height Feedback Observations

It was generally noted that height was more accepted in the Hillside and Richardson Character areas, with the exception of the lots along Labouchere Road. A number of submissions suggested increased heights in Hillside.

Some variation exists in the peninsula in the Mill Point Character Area, however, a general preference for some lowering of heights can be observed. The main exception to this is the immediate interface with the Mends Character Area, where the proforma submissions (see Section 4) are seeking an increase in height.

In the Mends Character Area there are a large number of submissions seeking a height reduction on specific adjacent properties, for the purpose of protecting the respondents existing views.

Given the divergence of views, and the various areas where feedback was focused, modifications to height requirements were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

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## 2.2 Podiums (71)

Podium development and references to podiums was the second most common theme throughout the submissions, with 31% of all submissions referring to this key element in some way.

A number of general comments suggest that podiums should not be in residential areas, podiums should only be for commercial activity or that podium development should not occur in the peninsula (27).

### 2.2.1 Podium Setbacks (33)

There were many comments that a nil setback would impede pedestrian access or a comfortable pedestrian environment, implying that respondents thought that the setbacks are taken from the street kerb rather than property boundary, or that an assumed nil setback would have a similar effect, implying that respondents did not fully understand the podium setback proposed.

There was some concern about the changing streetscape due to podiums and comments that the setbacks should vary between different locations to recognise the general character of an area (which is already the case in the draft ACP and proposed Amendment No. 61).

A few submissions (three) identified that the podium setback requirements impacted on small lot owners, making development challenging.

10 submissions suggested a need to protect green spaces by increasing setbacks for podiums and encouraging landscaping and tree planting.

Two submissions suggested improving the communication of the podium setbacks, as the measurement of setbacks shown on Map 3 of proposed Amendment No. 61 is confusing.

### 2.2.2 Podium Heights (13)

Although there were some misconceptions on the role of podium levels, there was relatively minor concern about the heights of podiums. Some comments were made about the need to increase podium heights to 13.5 metres to allow higher ceilings, but a similar number wanted podiums to remain at two storeys.

### 2.2.3 Podium Feedback Observations

There seems to be confusion as to the role, form and definition of podiums in the draft documents based on the feedback received. There is a strong correlation between submissions that refer to nil setbacks for podiums and those submissions that object to the podium provisions, even where the specific location discussed has a setback requirement in excess of nil (in some cases concerns were raised about nil setbacks in locations where the podium setback is proposed to be more than 8 metres).

This has influenced a significant number of submissions regarding the impact of podium development.

It is notable that some respondents specifically commented on the difficulty of understanding the setback map.

Given the divergence of views, modifications to podiums were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

It is recommended that the City consider modification of Map 3.

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## 2.3 Loss of Views (75)

Loss of views was raised by a number of submissions. However, the majority of submissions that raised this issue (53, or 23% of all submissions) related specifically to properties between Harper Terrace and Ferry Street (as analysed in 2.1.2). The style of submission was based on a proforma template, although many of these submissions modified the original text with personal comment. The recurring theme is that there was a premium paid for apartments with the promise that the views would not be built out. This cohort of responses relates to the corresponding height limits suggested of 17.5m and 25m.

### 2.3.1 Loss of Views Feedback Observations

Whilst it is recognised that some of the existing development in South Perth has access to extensive views, it should be noted that the planning system is subject to regular change and review. The absolute right to a view can only be guaranteed where that absolute right is enshrined in land tenure by way of restrictive covenants.

The submissions indicate that respondents may not have been aware of the existing planning frameworks which already allow for some change, or were not aware of a possibility of any changes in the future.

It is noted that the detailed structure planning of the South Perth area has been foreshadowed for some time.

## 2.4 Plot Ratio (48)

The ability to control buildings by plot ratio was also discussed by multiple submitters, with some suggesting that it led to maximising building bulk rather than providing a slimmer building, and others suggesting that the plot ratio in the plan unnecessarily constrains high quality development.

### 2.4.1 Plot Ratio Feedback Observations

Plot ratio is just one of the mechanisms proposed to manage building scale and bulk in the draft documents. It is combined with maximum tower floor plates, setback requirements and design quality provisions to reduce the likelihood of building bulk.

It is apparent that an improved communication of plot ratio as a mechanism may reduce some of the concern over this element. It is recommended that the City maintain information sheets to support the community's understanding of this requirement.

## 2.5 Loss of Property Values (48)

This concept is mainly related in these discussions to the perception that a premium was paid due to a promise of uninterrupted views that could not be built out.

There is a correlation between the loss of that guarantee and an assumed loss of value. To a minor extent there is also an underlying commentary that the extra apartments will reduce demand and thus reduce values in the area more generally.

There is also a suggestion that loss of daylight and proximity of adjoining development will reduce the attractiveness of existing apartments and thus reduce values in the area.

### 2.5.1 Loss of Property Value Feedback Observations

As noted in 2.3.1, the submissions referring to the promise of uninterrupted views appear to indicate a lack of understanding of the existing planning frameworks which already allow for some change. The submissions also indicate limited understanding about the absolute right to a view. It is apparent that many respondents were not aware of a possibility of any changes in the future.

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## 2.6 Traffic /Congestion (48)

The main concern raised was the impact of traffic on the local streets. The main intersection of Labouchere Road and Mill Point Road was seen as the key location of conflict. There was also some concern about the lack of entrance and exits to the ACP area and the existing heavy traffic movements.

### 2.6.1 Traffic/congestion Feedback Observations

The draft ACP was supported by expert transport planning consultants. Transport analysis concluded that, overall, the street network in the ACP area performs well under recommended growth scenarios whilst acknowledging that traffic forecasts show a majority of road links in the area will be operating over capacity in peak times by 2031 unless a greater proportion of trips are made by non-car transport modes.

There was therefore a strong focus in the draft ACP on reducing car use in the area and increasing the use of public transport, cycling and walking.

Ongoing communication, advocacy of public transport improvements and support for travel behaviour change may resolve these concerns and/or impacts by the 2031 timeframe. It is recommended that the City continue to provide feedback to the community regarding progress towards achieving the transition to alternative transport modes.

## 2.7 Setbacks (46)

Nearly 20% of submissions identified concerns with the setback provisions of the towers (as opposed to the podium).

A number of these submissions identify concern with setbacks between properties, suggesting that tower setbacks should be greater to ensure towers are tall and slender with more space between development.

Conversely, other submissions requested that the draft documents be amended to allow flexibility in setbacks, to enable site specific design, better manage solar access and contribute to enhancing the existing streetscapes.

### 2.7.1 Setback Feedback Observations

Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. The divergence of views regarding the setbacks illustrates how challenging it is to find the balance between flexibility and certainty.

Setback provisions more generally have proven to be a key concern and, as such, modifications to setbacks were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

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## 2.8 Carparking (41)

There was a lot of discussion about the provision of car parking and what the impacts of having minimum and maximum parking requirements meant. There is a concern that not providing enough parking in the buildings will mean an inundation of cars parking on the streets (18 submissions).

The main concern is associated with the lack of alternative transport in this location despite its proximity to the City. There was also a concern raised that parking ratios need to be increased because people will not want to 'give up' their cars.

23 submissions commented specifically that the car parking minimums are not high enough or that maximums should be removed.

### 2.8.1 Carparking Feedback Observations

The transport analysis concluded that without any upper limit control on parking, there is likely to be an oversupply of bays and no incentive to reduce private vehicle use, whilst the draft ACP has a strong focus on reducing car use in the area.

Ongoing communication, advocacy of public transport improvements and support for travel behaviour change may resolve some of these concerns, alongside the gradual changes to vehicle ownership rates currently being observed.

It is recommended that the City continue to provide feedback to the community regarding progress towards achieving the transition to alternative transport modes, as well as sharing information about car ownership rates and car parking occupancy levels..

## 2.9 Too many dwellings and too large a population being targeted (37)

There was a theme through several submissions that raised doubts around the population and number of dwellings that may eventuate from the changes to the planning regime around the ACP. These pointed to concerns as to how forecast numbers were calculated. There was some distrust of the process with what was considered by some to be an unrealistic target.

A large number of these submissions were the proforma template submissions analysed in 2.1.2 and 2.3.

### 2.9.1 Dwelling Target Feedback Observations

The submissions indicates a limited recognition of the needs of longer term planning for areas such as South Perth, where substantial growth is currently possible and where the State Government has identified there is capacity for growth.

There is a need to plan for the anticipated growth so that there is adequate planning for infrastructure and social services to respond to demand. Ongoing communication of the challenges and benefits of population growth will be necessary.

It is recommended that the City maintain information sheets regarding the management of public benefits as well as the benefits that have been and are proposed to be achieved.

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## 2.10 Shadowing (33)

The concept of the shadowing was raised mainly in terms of impact on existing facilities and residences. The main reference to overshadowing was in relation to the swimming pool at the apartment complexes known as Reva and Aurelia. The concern raised was that the additional height would impact on the thermal heating for the pool.

There was also a couple of personal experiences from owners who have had larger developments next door to them and are feeling the impacts of reduced sunlight. This included the increased costs of heating and cooling due to reduced access to sunlight (and ventilation).

### 2.10.1 Shadowing Feedback Observations

Shadowing is a realistic concern in areas where substantial development is proposed. Modifications to shadowing requirements were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

## 2.11 Train Station (30)

There is a sense of both hopelessness that the station will never be built so therefore shouldn't be considered as a reason for increased development, and frustration that the need for a station is completely obvious but no one in authority is recognising it. The 30 submissions regarding the train station fell quite equally into either the category of 'forget about' the train station, or 'hurry up' with the train station.

### 2.11.1 Train Station Feedback Observations

The draft ACP focuses the distribution of forecast growth in a way that contributes to the business case for a station to be developed. The submissions illustrates how challenging it is to balance expectations.

## 2.12 The Zoo (27)

The Perth Zoo was raised in a couple of different scenarios. There are concerns raised about the land being used as part of the public open space calculation for the plan where the grounds are not available for open space activities. This is due to the land being restricted to those who pay for entry.

There are also concerns raised that development on the edges will impact on the zoo by casting shadow and impacting on the micro-climate.

### 2.12.1 Zoo Feedback Observations

It is noted that the Perth Zoo is not open for public access. However, the grounds provide visual access to substantial tree canopy, contribute to an improved micro-climate and have tangible amenity benefits from its presence.

Modifications related to shadowing of the zoo were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

## 2.13 Car Parking as Plot Ratio (26)

The inclusion of car parking within the Plot Ratio has been raised with concerns that this will push developers to build underground parking. The underground parking raises concern about dewatering issues. Alternatively, a number of submissions suggested that parking should not be included in plot ratio (as is the case in other jurisdictions).

### 2.13.1 Car Parking as Plot Ratio Feedback Observations

Including car parking in plot ratio is just one of the mechanisms proposed to manage building scale and bulk in the draft documents. The feedback from respondents illustrates how challenging it is to balance expectations of the various stakeholders.



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## 2.14 Types of Land Uses (25)

The majority of the submissions relating to this topic refer to the perceived loss of opportunity to have serviced apartments throughout the peninsula. There were specific concerns that the Peninsula Apartments would lose the ability to redevelop or expand because serviced apartments are not proposed as a permitted use in proposed Amendment No. 61.

There was also a concern expressed about the role of the precinct in the hierarchy of district centres, correlating the district centre designation in State Planning Policy 4.2 (SPP 4.2) to the scale of residential density. These submissions suggested the land uses being sought for activation were more typical of higher order centres.

As previously noted, reference was made (seven) that South Perth is not the CBD or an extension of the CBD (Section 2.1.3).

### 2.14.1 Land Use Feedback Observations

The feedback from respondents indicates significant support for increased land use permissibility. Modifications to land use requirements were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

With regard to the scale of the centre, there appears to be some misinformation about the intent and limitations of SPP 4.2, which designates centre typologies to guide retail floor space rather than the scale of non-retail development. The built form and non-retail outcomes of an activity centre are highly contextual and are assessed and determined through development of an ACP.

## 2.15 Design Quality (23)

The importance of good design and how it was assessed and determined was raised as a key concern. The confidence that the City's Design Review Panel was independent was raised as an issue. Discretion as part of the design and approval process was also raised as an issue (21).

### 2.15.1 Design Quality Feedback Observations

The feedback from respondents indicates significant support for the design quality objectives, whilst also illustrating how challenging it is to balance expectations of the various stakeholders.

It is recommended that the City maintain information sheets regarding the design review process and the developments which have been considered by the design review panel over time. Greater transparency of the process may resolve some of these concerns.

## 2.16 3D Modelling (20)

Visualising the impact of buildings on adjoining neighbours, streetscapes and the view from Kings Park and the City foreshore was proving difficult for some submitters due to the many interrelated planning requirements. They suggested a form of 3D modelling to assist with this visualisation.

### 2.16.1 3D Modelling Feedback Observations

The feedback from respondents reflects how challenging it is to visualise longer term built form outcomes where the planning frameworks are complex. However, simple forms of 3D modelling that show buildings without site context can be misleading and may not improve understanding of the future outcomes.

Information sheets as suggested in Section 2.15.1 may resolve some of these concerns.

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## 2.17 Additional Development (19)

There appears to be a full range of views in relation to additional development and public benefit contributions. Suggestions have been provided for how benefits can be utilised. There is also suggestion that the requirements may be too onerous.

### 2.17.1 Additional Development Feedback Observations

The feedback from respondents reflects a strong desire to ensure benefits are realised from development in the ACP area, linking additional development potential to an observable return for the area.

It is recommended that the City maintain information sheets regarding the management of public benefits as well as the benefits that have been and are proposed to be achieved.

The suggestions made for public benefits through the feedback forms will be considered in the granting of additional development.

## 2.18 Design competition (17)

The cost of a design competition was raised as a serious impost to developers. The State's new Design Review Panel was provided as an alternative option to give peace of mind that the development was of good quality. The cost of involving two additional architect firms to provide designs was raised as a key concern.

### 2.18.1 Design Competition Feedback Observations

The feedback from respondents indicates significant support for the design quality objectives, whilst also illustrating how challenging it is to balance expectations of the various stakeholders.

As noted in Section 2.17.1, the feedback from respondents reflects a strong desire to link additional development potential to an observable return for the area.

Ongoing review of proposed P321 may result in amendments to refine the design competition process once the draft ACP and proposed Amendment No. 61 are finalised.

## 2.19 Mid-Block Links (15)

Several submissions raised concern over the mid-block link locations shown in the plan, indicating that these would unnecessarily penalise some land owners. They suggested that these should be suggested only, and not mandated.

### 2.19.1 Mid-Block Links Feedback Observations

It is apparent that the location of mid-block links in the draft ACP is interpreted as being mandatory, which has led to some concern over the impact to particular land owners.

It is noted that the mid-block links are shown as opportunities, rather than mandated, and that there are specific provisions for these links to be funded through public benefit contributions so as not to penalise owners that contribute land for the benefit of the ACP area as a whole.

## 2.20 Public Realm

The importance of the public realm and recreation space was raised generally through many submissions. The protection of the foreshore, Perth Zoo, Richardson Park and Windsor reserves were all raised.

### 2.20.1 Public Realm Feedback Observations

Feedback from respondents indicates support for the objectives of the draft ACP.

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## 2.21 Other Matters (supportive)

A number of other matters were raised in limited numbers that supported the proposed plans.

These are as follows:

- Access to public transport (13)
- Extend the Mends Street area north/west (11)
- Sustainable design (9)
- Include the Royal Perth Golf Club in the ACP area (6)
- Tall and slender towers (5) / Supporting the floor plate area (4)
- Water disposal opportunities (4)
- Public contribution (3)
- Tourism opportunities (3) / land use opportunities (3)
- Reduced car parking (3) / alternative transport/bikes (2)
- Deep soil zones (1)
- Affordable housing (1)
- Universal access (1)
- Aboriginal recognition (1)

### 2.21.1 Other Matters (supportive) Feedback Observations

A number of other objectives or requirements of the draft documents were generally supported by the respondents. The feedback confirms the importance of taking the greatest possible advantage of the development of the ACP area by developing in a sustainable, inclusive and economically sensible way.

## 2.22 Other Matters (not supportive)

A number of other matters were raised in limited numbers that raised concerns about the proposed plans.

These are as follows:

- Concern about the cost of additional height and plot ratio (10)
- Development in Hillside on the sloping lots (9)
- Non-residential plot ratio (9) / mix of commercial and residential (2)
- Noise (8) / construction damage (2) / pollution (1) / health impacts (1)
- Concern about the capacity of utility services (7)
- Needs higher green star (sustainability) outcomes (7)
- The plan will change the character of the place (5)
- Procedural issues - did not like the process (4)
- Wrong plant species (4)
- Not enough public transport alternatives (4)
- Loss of trees (4) / provision of deep soil zones (3)
- Tower floorplate percentage is too high (3)
- General impact of increased crime (3)
- Impact on heritage (2)
- Precinct is not suitable for families (1)
- Ratio of one-bed dwellings is too high (1)

### 2.22.1 Other Matters (not supportive) Feedback Observations

A number of responses related to other requirements of the draft documents indicated a lack of confidence that the draft documents would result in positive outcomes.

The feedback presented concerns of residents and developers alike, and illustrates how challenging it is to balance expectations of the various stakeholders.

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## 2.23 General Analysis of Submissions

Of the total 225 individuals (persons or organisations) that provided responses to the draft ACP and proposed Amendment No. 61, approximately 26% generally supported the draft documents, 64% generally did not support the draft documents and 10% can be categorised as neutral or are government agencies.

With only 86 of the total respondents providing age profile information (from the feedback form summary in Section 3), the most common age groups who participated were the 55-64 and 65+ age brackets, which equate to approximately 67% of all submissions. This appears, anecdotally, to reflect the written, email and hand delivered submissions age distribution based on the authors' knowledge of submitters.

As accurately as can be analysed (using typical names/genders), approximately 23% of all responses were female, with a further 9% being submitted by two or more persons which includes a typical female name.

Approximately 62% of respondents identified themselves as residents within the ACP study area, 7% as South Perth residents or property owners (the South Perth post code other than the study area), a further 8% identified themselves as residents within the City of South Perth Local Government area (e.g. Como, Manning, Waterford etc), whilst 6% of respondents identified as being from other Western Australian suburbs. 10 submissions (4%) were received from landowners or consultants of landowners, whilst just 6 submissions came from Government Agencies. 11% of submissions did not state an address.

From this we can determine that the overall feedback is highly localised to the study area, whilst we recognise that the responses over-represent males and people over the age of 55.

# 3. Summary of Feedback Forms

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A series of feedback forms were provided online to facilitate feedback from community members. The feedback forms were focussed on nine key elements of the draft ACP, the proposed Amendment No. 61 and proposed P321.

The responses to the feedback forms are presented in this section, providing a brief summary of the feedback regarding each key element.

Each key element provided an opportunity to comment on the objectives of that element as well as provide additional comments. There are a considerable number of graphs associated with the feedback form outputs and only the most instructive are reflected in this section. All charts associated with the key elements can be found in Appendix C.

Where open text fields were provided, unedited submissions are included in attachment in full (with the exception of identifying features, reference to individuals or inappropriate content which has been removed). The content of feedback form written submissions was analysed with direct email and letter submissions in Section 2.

108 individuals submitted in this way, for a total of 365 feedback forms across the key elements.

In addition, a large number of submissions were received in hard copy at the close of submissions. This consisted of :

- 115 proforma submissions seeking increased development rights on a specific site in the study area; and
- 436 proforma submissions seeking relaxed land use permissibility on a specific site in the study area.

The proforma submissions are considered separately in Section 4 due to the site specific nature of the feedback.

## 3.1 Clarifications

In order to avoid repetition in this section please note the following:

1. Answering all questions in the feedback forms was not mandatory, and not all respondents answered all multiple choice questions. As such, the total number of respondents to each key element is often higher than the total number of responses in the graphs.
2. A number of graphs indicate feedback more relevant to other key elements. Some of these expressed a broader concern about the draft ACP itself and commented on the policy framework which underpins the draft ACP. This is considered in Section 2.14 of this Report.

### 3.2 Land Use

A total of 39 participants responded to this key element in the feedback forms. As noted in Section 3.1, not all participants answered all of the questions.

Comments suggest general support for the objectives of the element, with nearly 59% of responses supporting the land use requirements of Amendment No. 61 (see Figure 2).

When asked about possible changes to the draft documents, 23 participants responded (see Figure 3).

10 participants are opposed to the draft documents in general based on the land use assumptions, data used and the implications of the activity centre being more intense than policy requires. These comments were summarised previously in section 2.14 and are also referenced in Section 3.1.

Eight participants requested greater land use flexibility across the ACP area.

Many of the specific comments do not relate to matters of land use, and are instead additional objections to the draft documents.

The majority of respondents were over 55 years of age (66%) and were residents or property owners outside of the activity centre but still residents of the City of South Perth (66%).

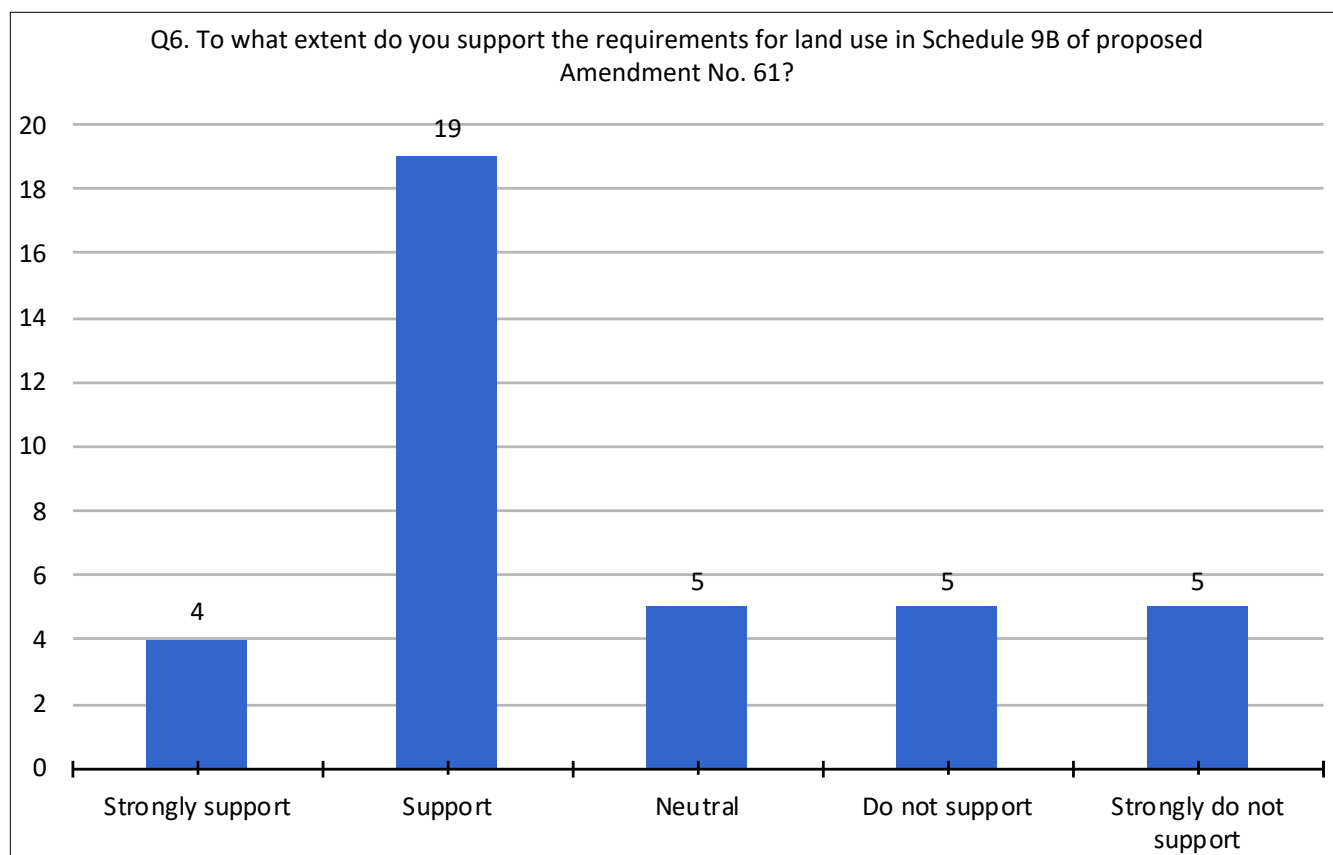


Figure 2 - Land Use Key element - Support



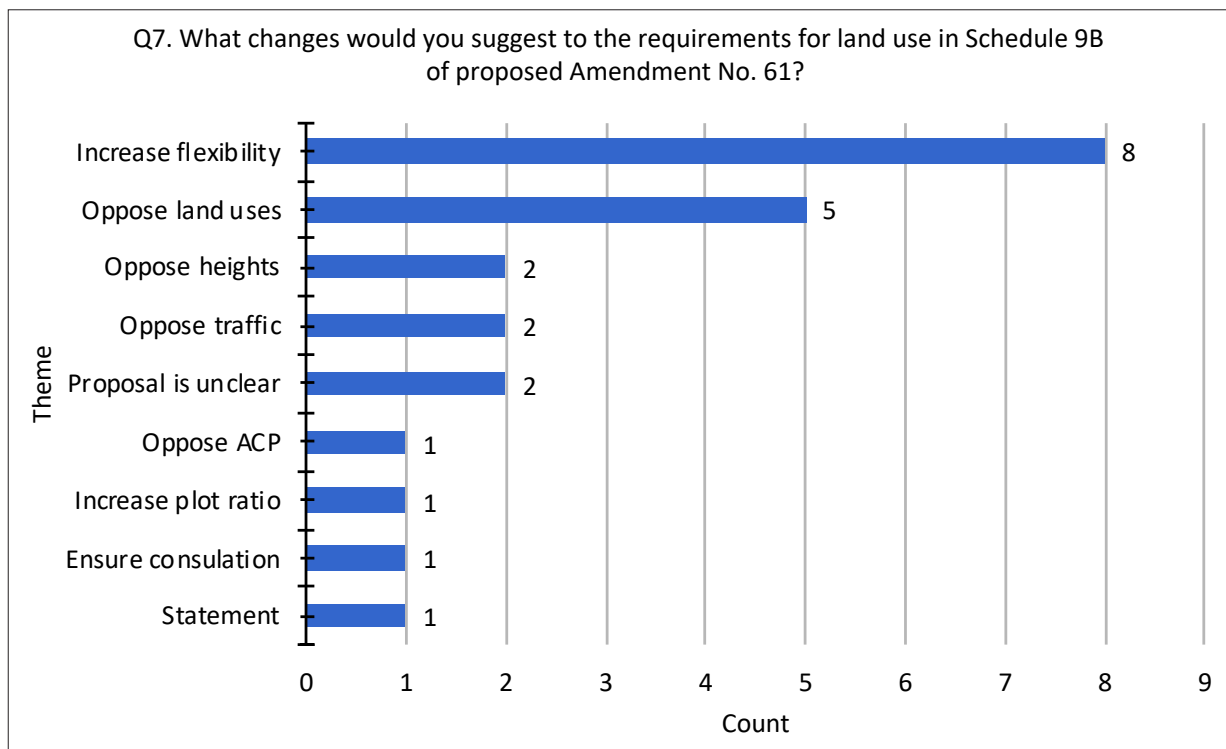


Figure 3 - Land Use Key element - Suggested Changes

### 3.2.1 Comment

Specific feedback on this key element was generally limited to matters of greater permissibility of land uses, or matters with limited relationship to the land use key element.

Specific feedback that might necessitate modifications relate to flexibility of some land uses and comments about the clarity of the draft documents themselves. It is acknowledged that some of the graphics and maps could be more clear.

It is recommended that the City consider improvements to the draft documents to make them easier to understand. Modifications for land use flexibility were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

### 3.3 Building Size (Height and Plot Ratio)

A total of 69 participants responded to this key element in the feedback forms.

Comments suggested general support for the objectives of the element but some divergence of opinion regarding the requirements of Amendment No. 61 (see Figure 4).

Notably, 20 were against the height proposed, four suggested to reduce heights in specific locations, and three generally opposed the draft documents (see Figure 5).

Conversely, 7 suggested no height restrictions, seven suggested an increase in height or plot ratio and 6 suggested removing car parking from plot ratio calculations (thereby increasing plot ratio for other development).

All respondents who answered the question regarding the 'tiering' supported that element (40) (see Figure 6).

The majority of respondents were over 55 years of age (66%) and were property owners outside of the activity centre but still residents of the City of South Perth and/or visitors to the activity centre area (95%). 37% of respondents were property owners within the activity centre.

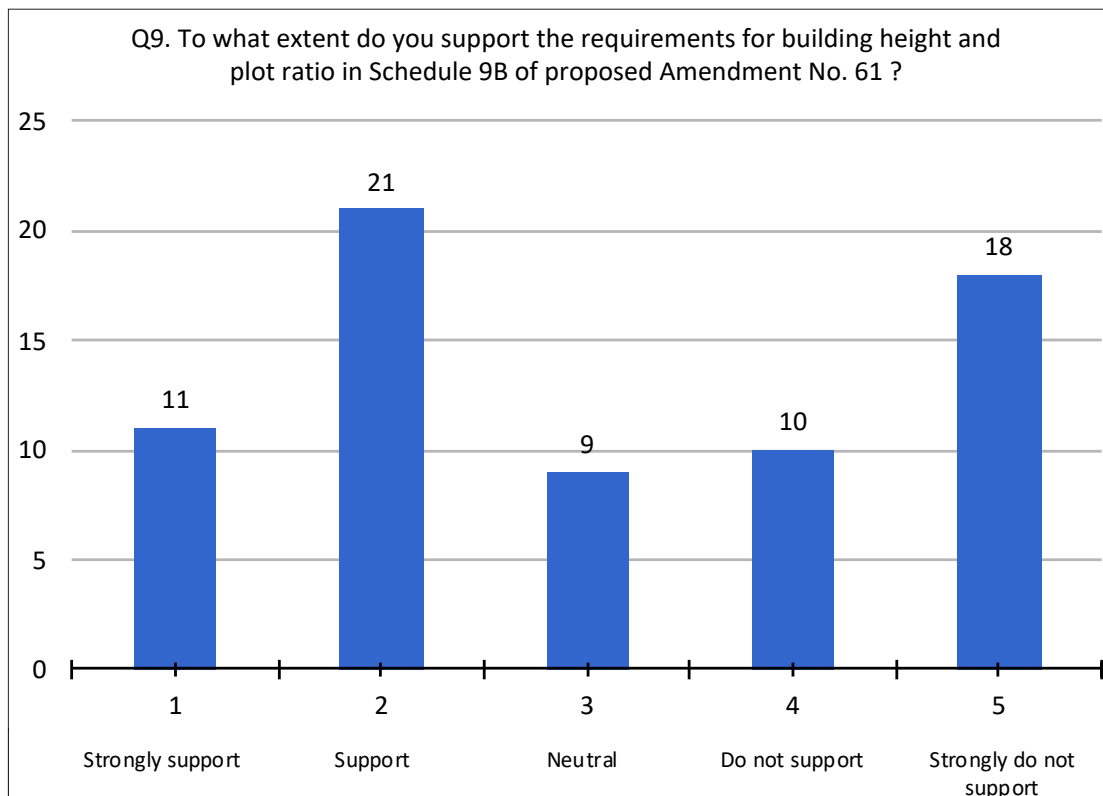


Figure 4 - Building Size Key element - Support

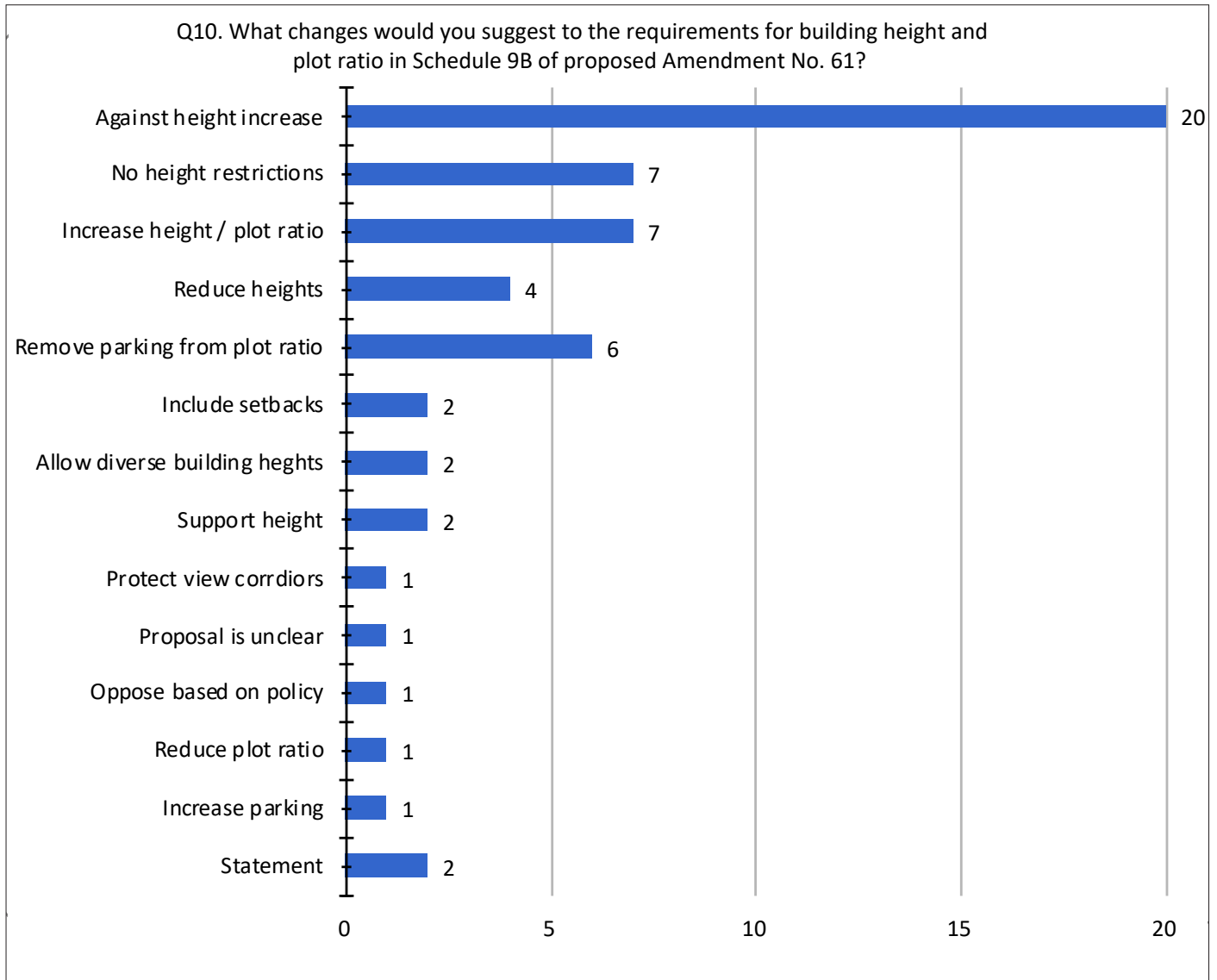


Figure 5 - Building Size Key element - Suggested Changes

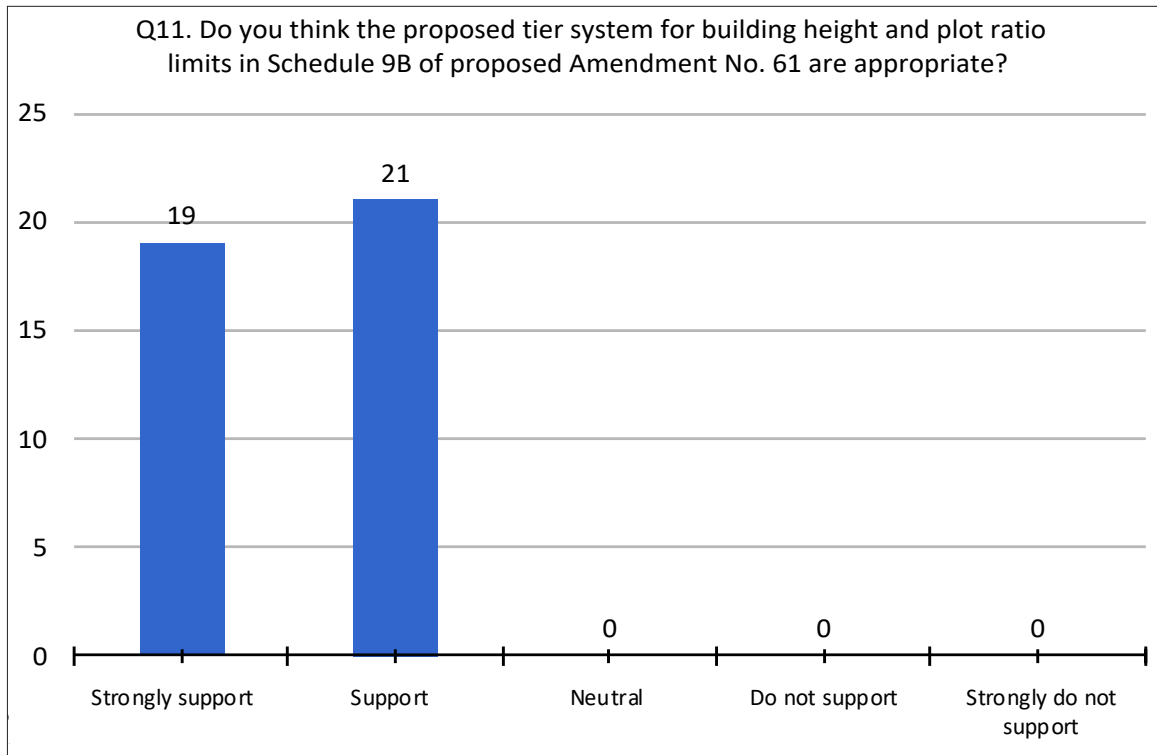


Figure 6 - Building Size Key element - Support for Tiering

### 3.3.1 Comment

Height was the most controversial key element of the draft documents. The variance in feedback and divergence of views was noted throughout the whole engagement process, and modifications related to height requirements were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

### 3.4 Podiums

A total of 32 participants responded to this key element in the feedback forms. Comments suggested general support for the objectives of the element but some divergence of opinion regarding the requirements of Amendment No 61 (see Figure 7).

Eight respondents suggested suggested a preference to increase the setbacks and three suggested podiums should not be permitted (see Figure 8).

Conversely, six respondents suggested increased flexibility for podiums to ensure they are placed more appropriately at the ground level.

Five provided comments unrelated to podiums.

The majority of respondents were over 55 years of age (71%) and were residents or property owners outside of the activity centre but still residents of the City of South Perth (90%).

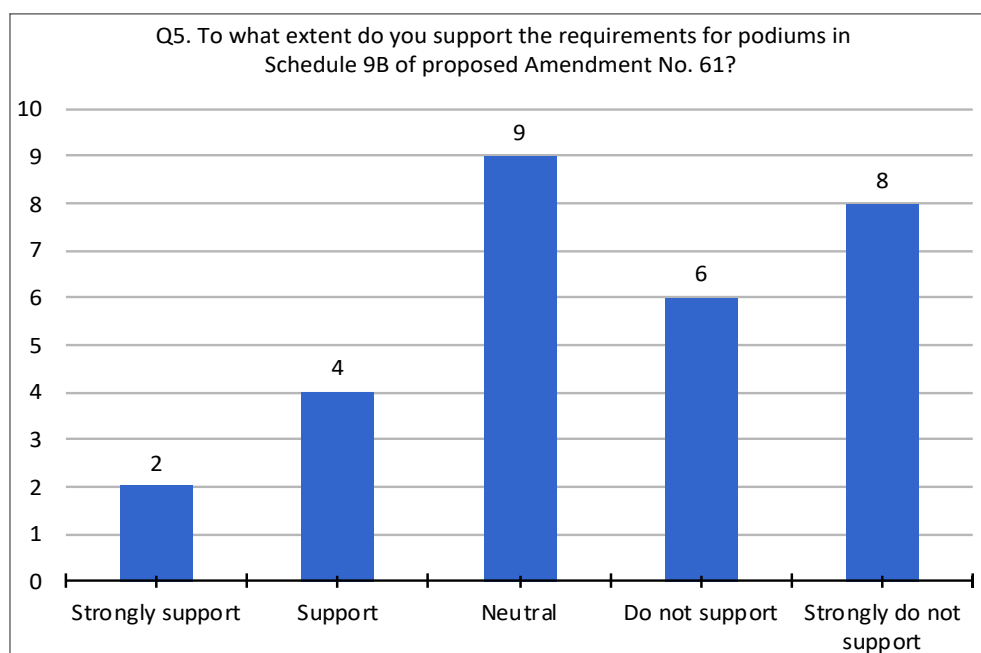


Figure 7 - Podium Key element - Support

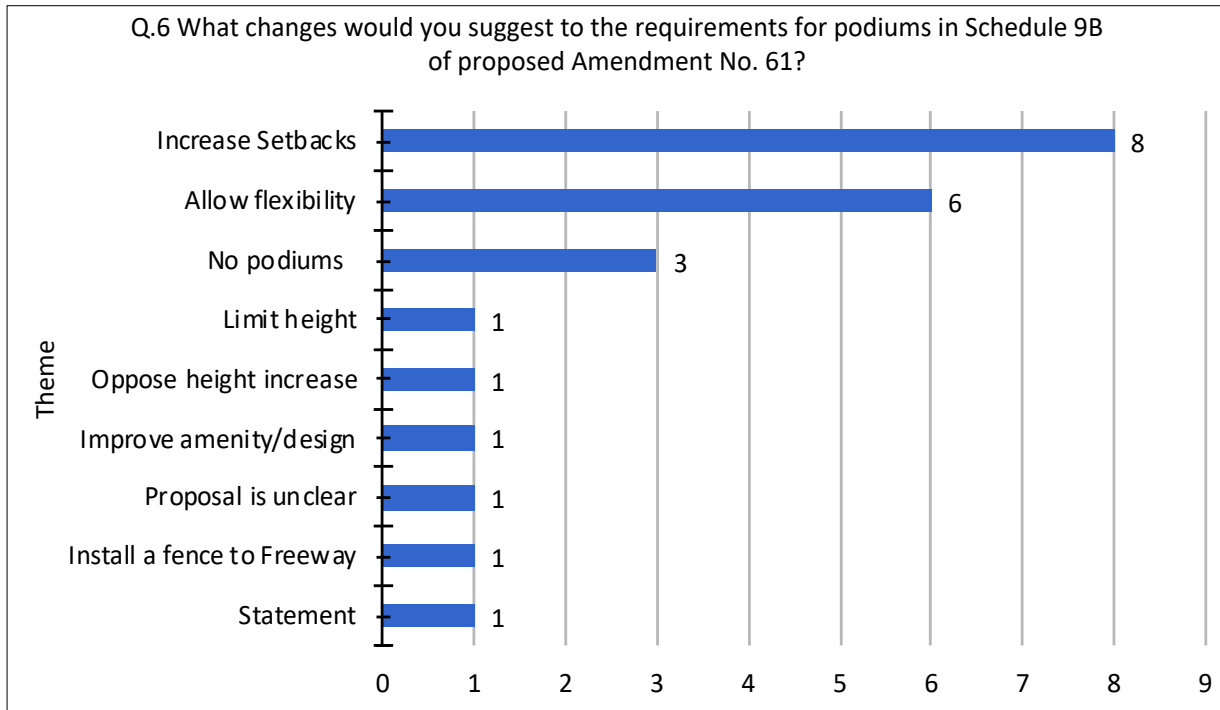


Figure 8 - Podium Key element - Suggested Changes

### 3.4.1 Comment

As noted in Section 2.2.3, there is some confusion regarding setbacks for podiums.

Given the divergence of views, modifications related to podium requirements, including setbacks, were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

It is acknowledged that the the maps could be more clear. It is recommended that the City consider modifications to the draft documents to make them easier to understand.



### 3.5 Towers

A total of 31 participants responded to this key element in the feedback forms. Comments suggested general support for the objectives of the Element and general support for the requirements of Amendment No. 61 (see Figure 9).

Four respondents suggested allowing greater flexibility for towers, whilst eight respondents suggested increased setback, or opposed the draft documents in general, for a variety of reasons (see Figure 10).

There was some divergence of opinion regarding the tower floorplate area requirements of Amendment No. 61 (see Figure 11).

The majority of respondents were over 55 years of age (67%), were residents outside of the activity centre but still residents of the City of South Perth (58%) or lived within the activity centre (48%). As these numbers indicate an overestimation of where people live in relation to the study, it is assumed that some respondents identified themselves in multiple categories.

#### 3.5.1 Comment

As towers relate to height, modifications related to tower requirements were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

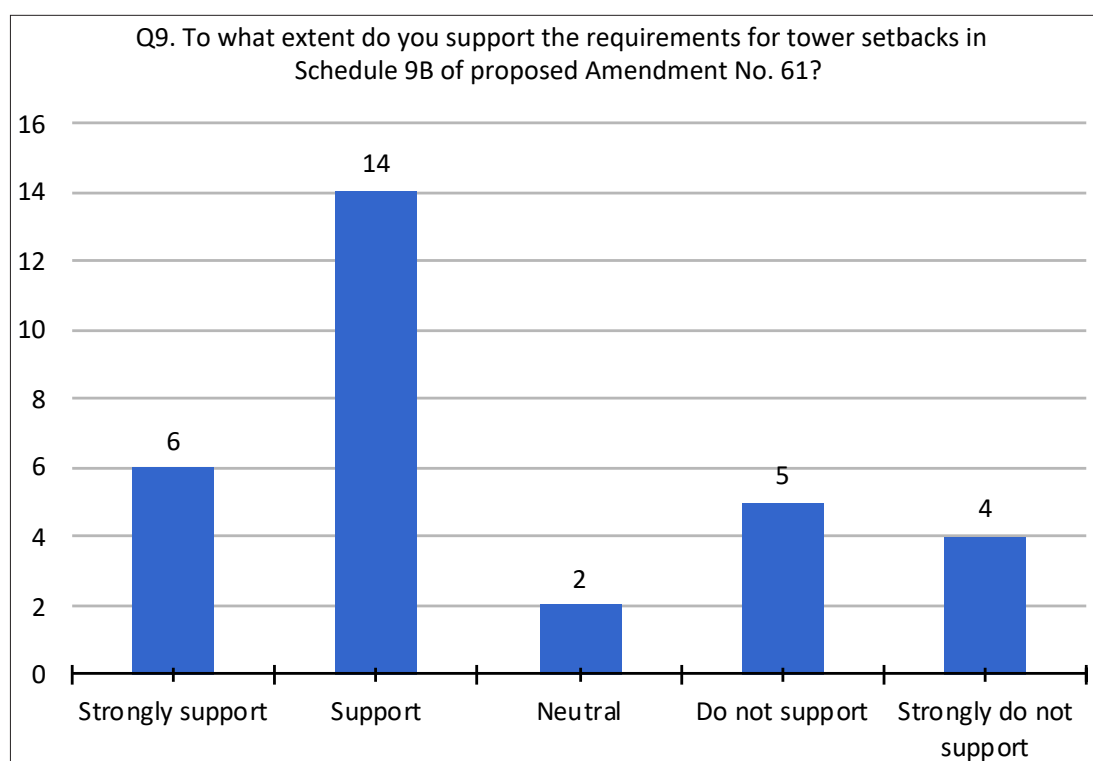


Figure 9 - Towers Key element - Support for Setbacks

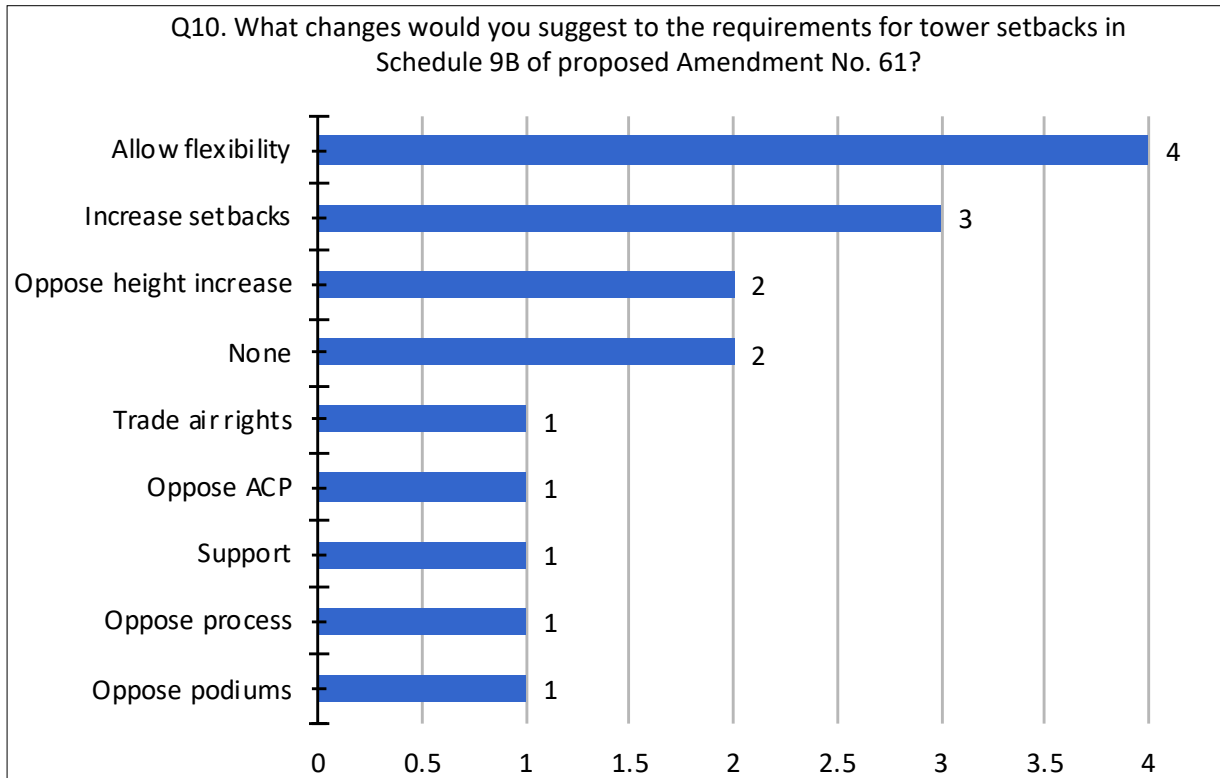


Figure 10 - Towers Key element - Suggested Changes

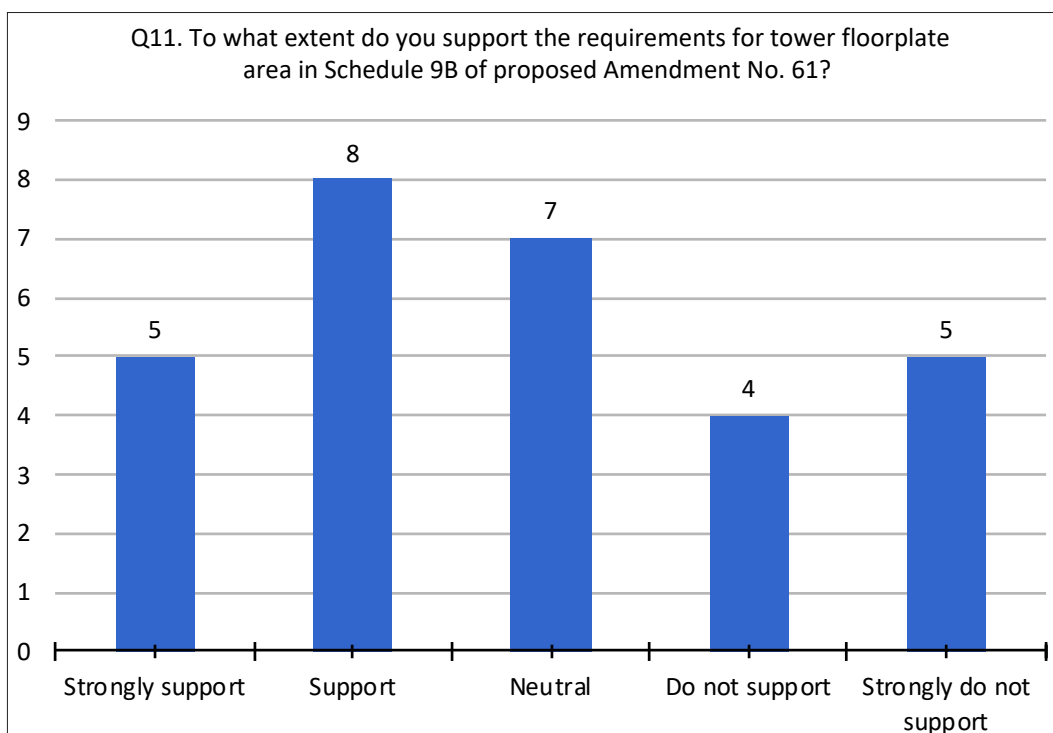


Figure 11 - Towers Key element - Support for Floorplate Area

### 3.6 Design Quality

A total of 28 participants responded to this key element in the feedback forms. Comments suggested general support for the objectives of the Element but some divergence of opinion regarding the requirements of Amendment No. 61 (see Figure 12).

Six respondents suggested that the requirement for a competitive design process was too onerous, whilst five generally opposed the proposed height and density or suggested the design competition process be applied to all proposed development. Two suggested reducing heights in one specific location (see Figure 13).

The majority of respondents were over 55 years of age (64%) and were residents or property owners outside of the activity centre but still residents of the City of South Perth (53%).

#### 3.6.1 Comment

As noted in Section 2.18, the competitive design review process is intended to balance the diverse expectation for the community, which is reflected in the diverse comments by respondents.

Ongoing review of proposed competitive design process may result in amendments to refine the design competition process once the draft ACP and proposed Amendment No. 61 are finalised.

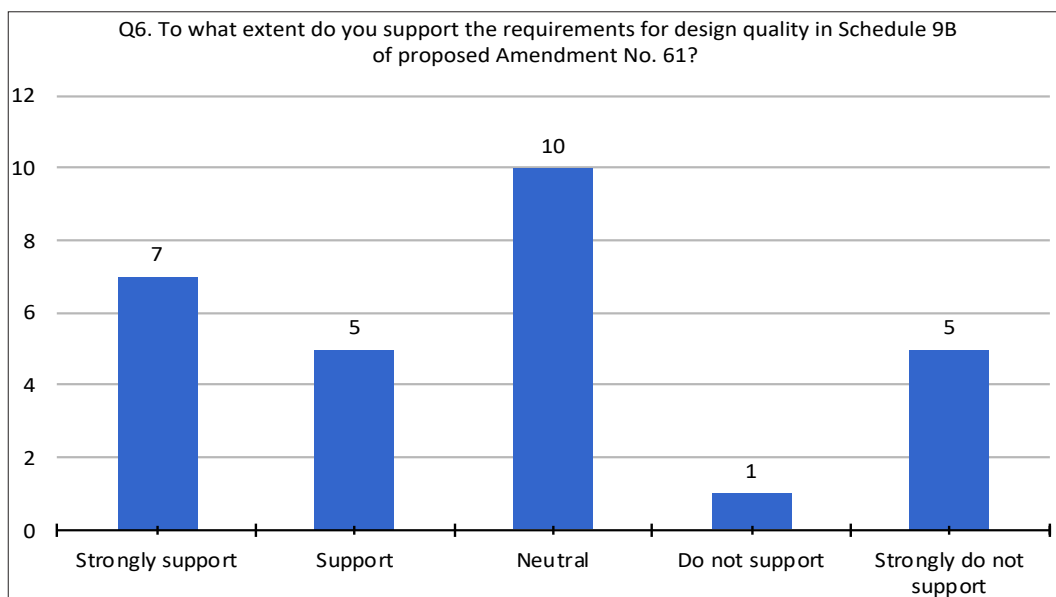


Figure 12 - Design Quality Key element - Support

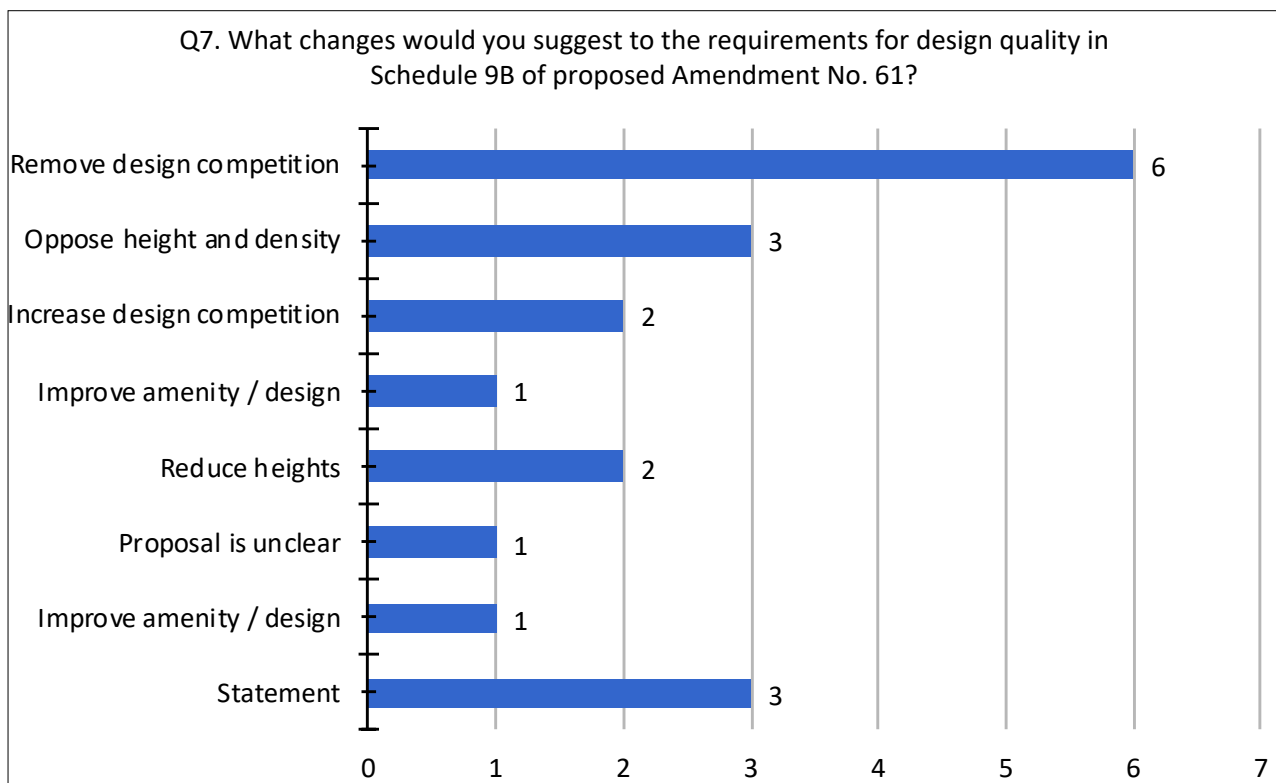


Figure 13 - Design Quality Key element - Suggested Changes

### 3.7 Additional Development

A total of 27 participants responded to this key element in the feedback forms.

Comments suggested general support for the objectives of the Element and a slight favour towards supporting the requirements of Amendment No. 61 (see Figure 14).

When asked to consider the best use of public benefit contributions, the majority of respondents ranked upgrades to public open space as the priority, followed by transport infrastructure and streetscape and public realm upgrades (see Figure 15).

When asked what other infrastructure should be funded by contributions (see Figure 16), respondents suggested the train station (25%), public transport facilities (14%) and high standards of residential amenity (11%).

14 respondents answered the question regarding potential changes, with three indicating they did not support the additional development framework, three expressing concern that it would not work and three suggesting greater flexibility be allowed (see Figure 17).

The majority of respondents were over 55 years of age (59%) and were residents or property owners outside of the activity centre but still residents of the City of South Perth (59%).

#### 3.7.1 Comment

The suggestions made for public benefits through the feedback forms will be considered in the granting of additional development. Further consideration of opportunities for public benefit were considered during detailed engagement undertaken with the Stakeholder Reference Group and the Community Panel.

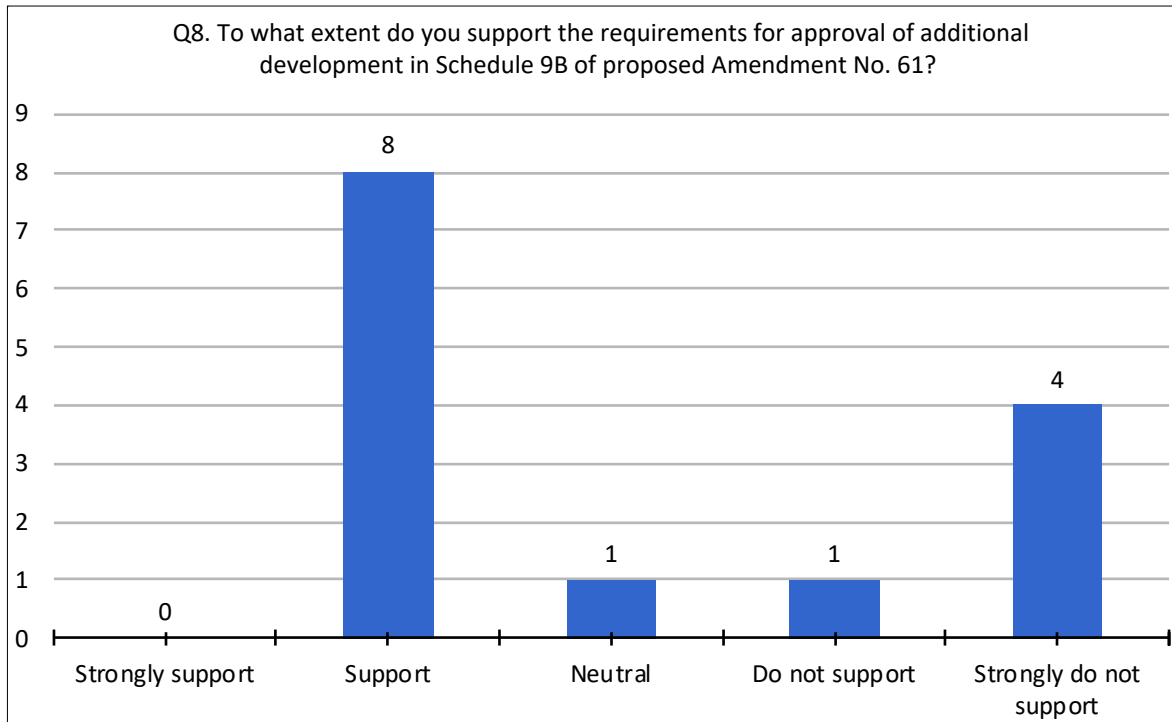


Figure 14 - Additional Development Key element - Support

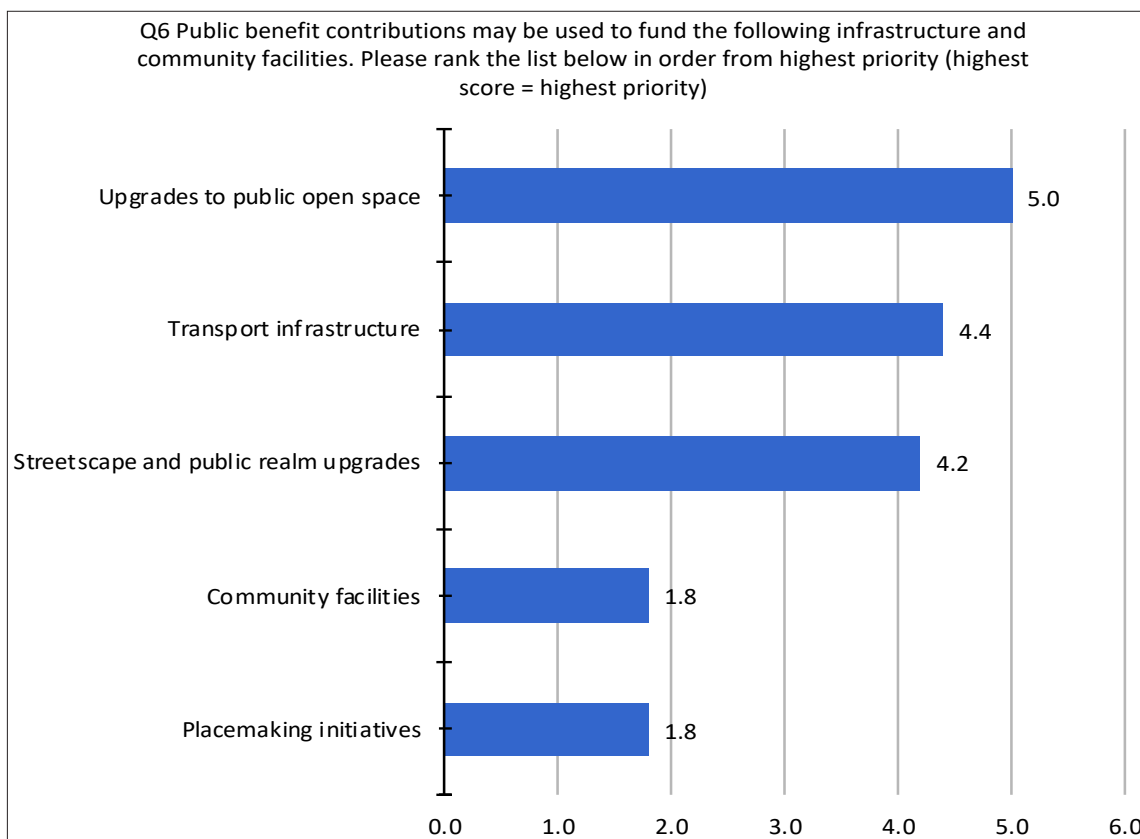


Figure 15 - Additional Development Key element - Ranked benefits

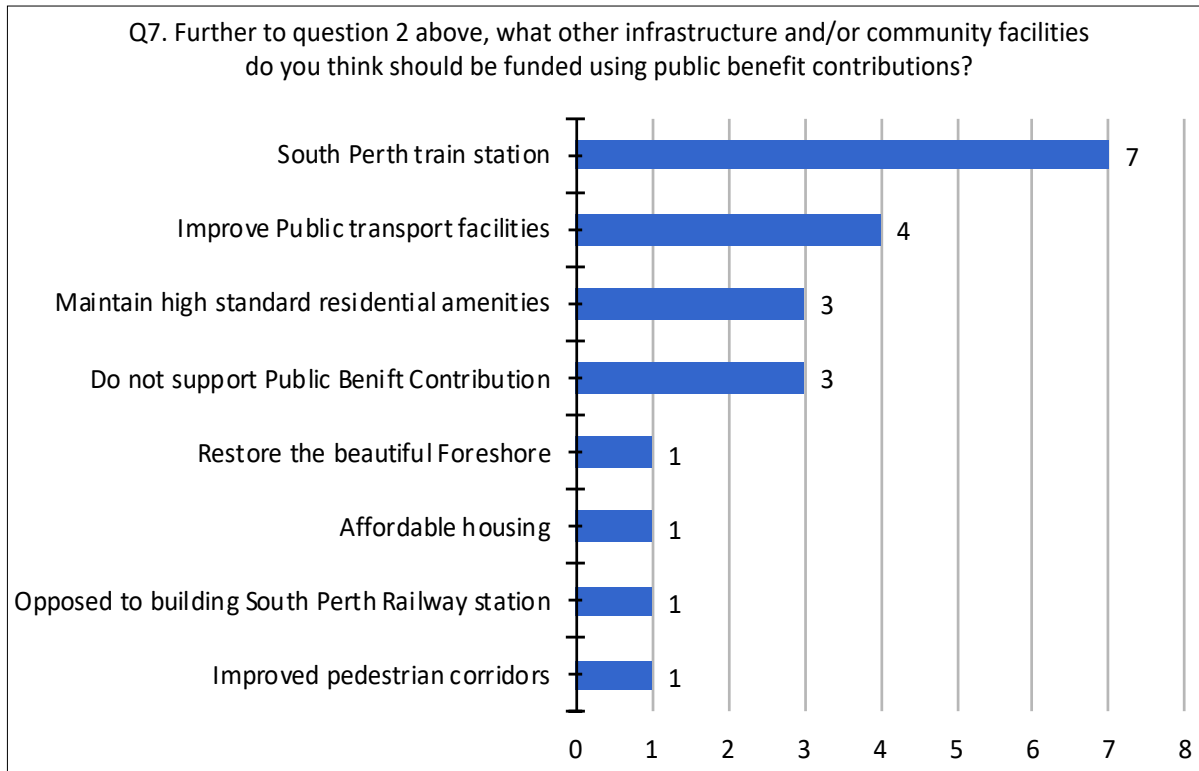


Figure 16 - Additional Development - Other Benefits

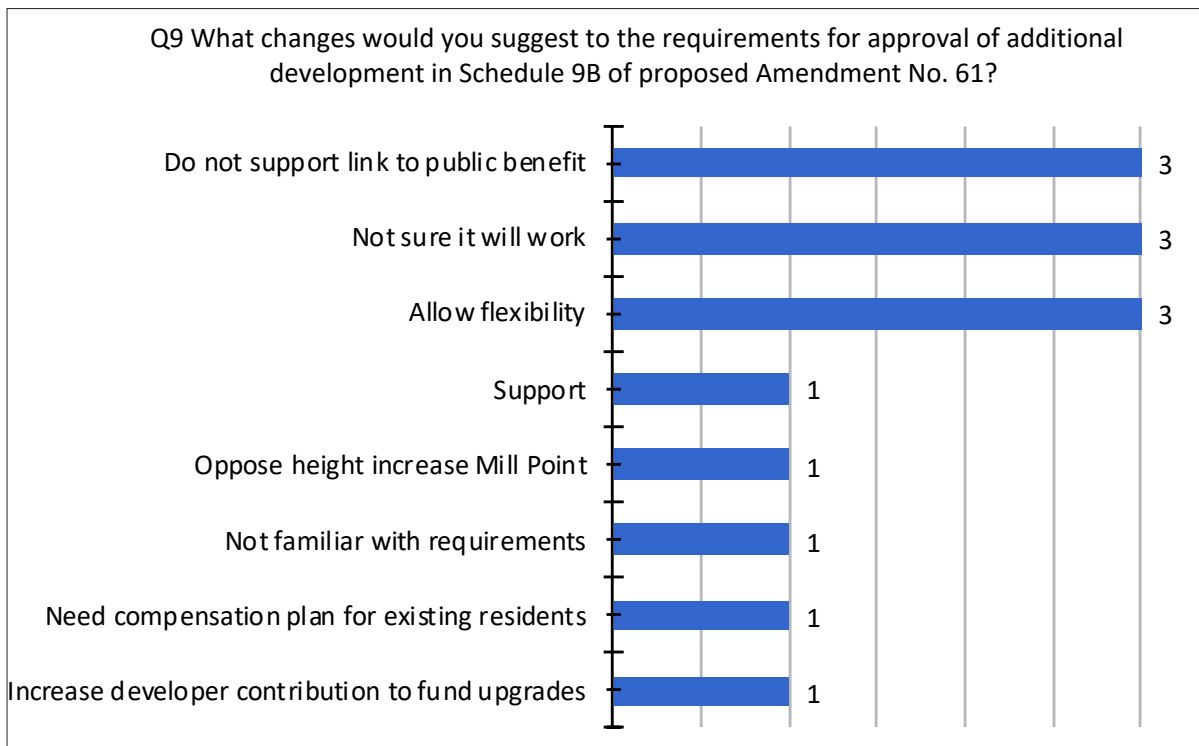


Figure 17 - Additional Development - Suggested Changes



### 3.8 Bicycle and Car Parking

A total of 28 participants responded to this key element in the feedback forms.

Comments suggested general support for the objectives of the Element and a slight favour towards supporting the bicycle parking requirements of Amendment No. 61 (see Figure 18). The opinion regarding the support for car parking requirements of Amendment No. 61 was more neutral (see Figure 19).

Where comments were provided, it typically favoured the need to provide adequate on-site parking in developments (see Figure 20).

The majority of respondents were over 55 years of age (64%) and property owners within the activity centre (50%).

#### 3.8.1 Comment

Car parking remains a relatively high concern for the community. Section 2.6 and Section 2.8 provide some recommendations for ongoing communication.

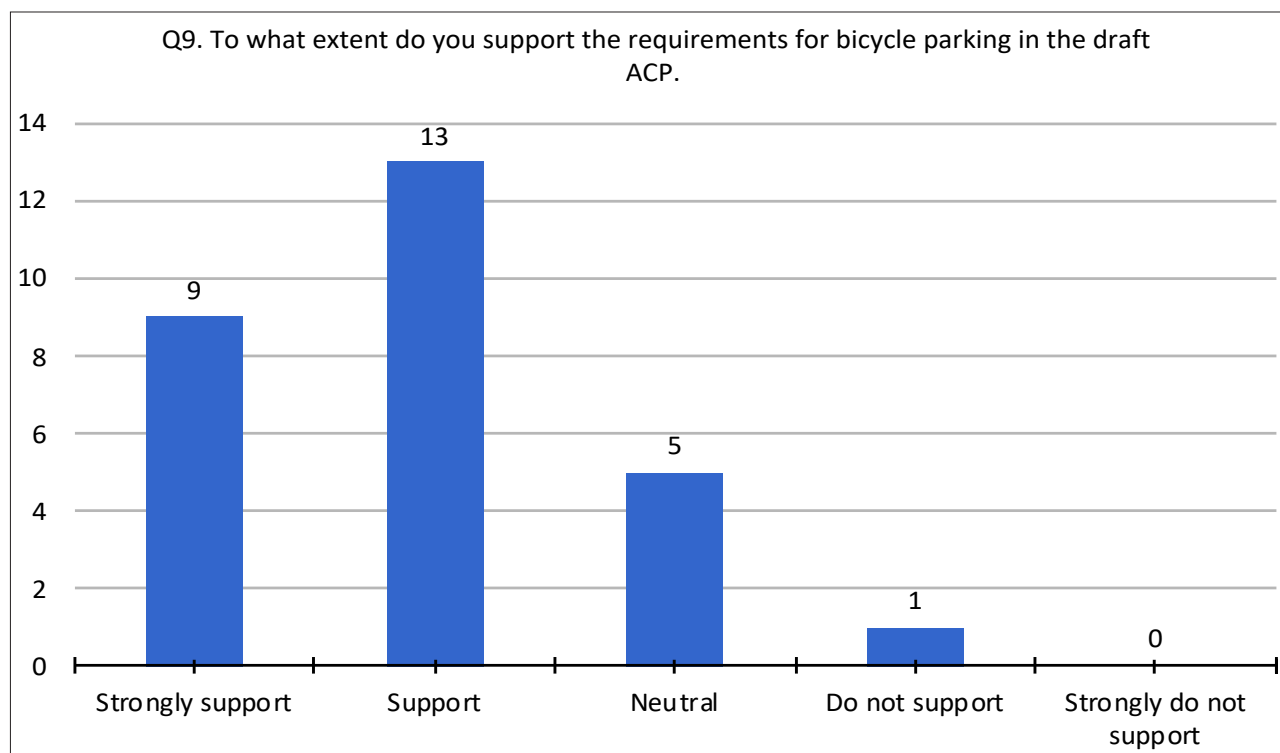


Figure 18 - Bicycle and Car Parking Key element - Bicycle Support

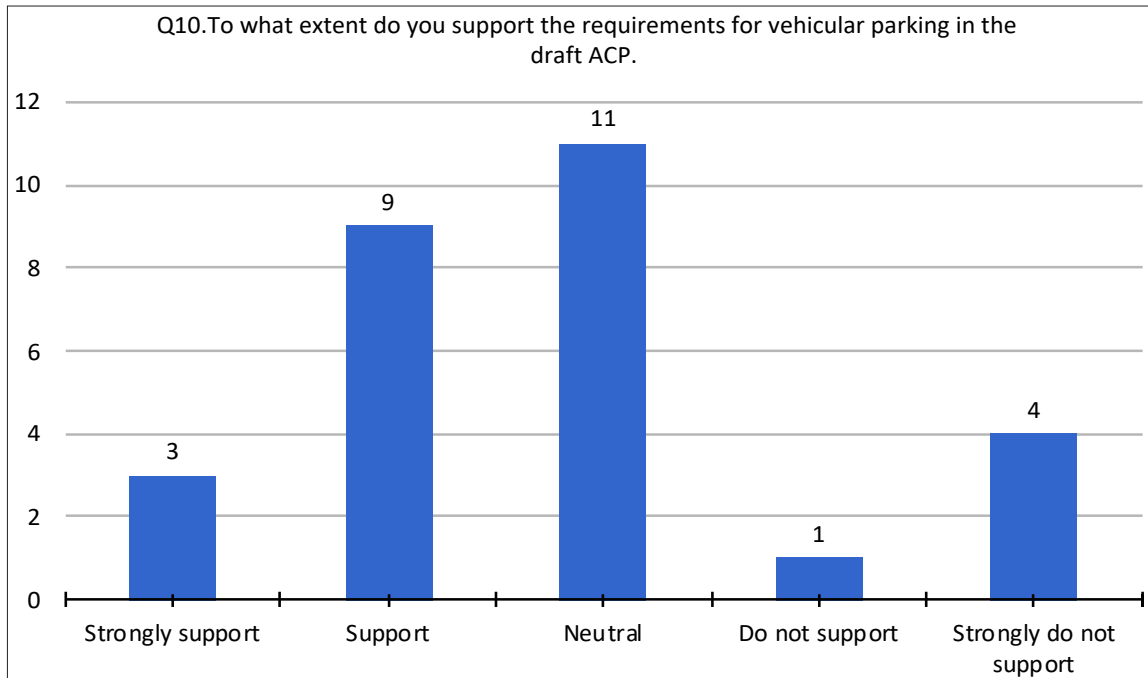


Figure 19 - Bicycle and Car Parking Key element - Car Parking Support

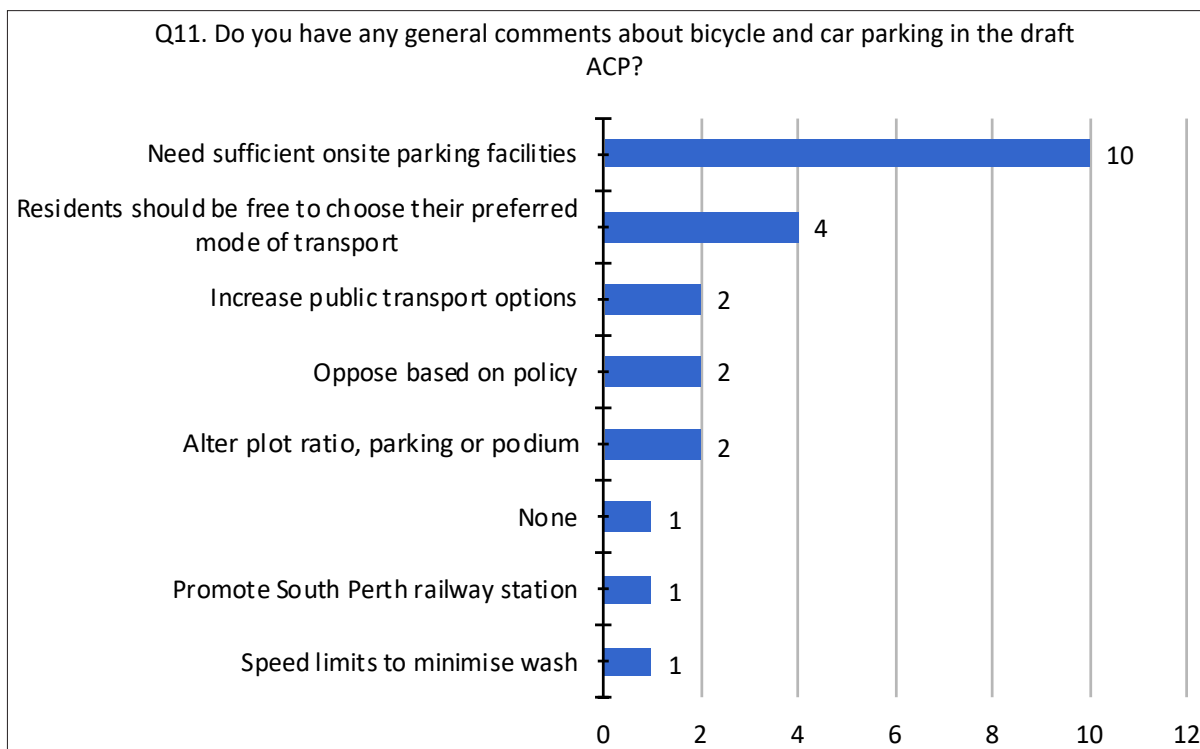


Figure 20 - Bicycle and Car Parking Key element - Suggested Changes

### 3.9 Movement and Access

A total of 33 participants responded to this key element in the feedback forms.

Comments suggested general support for the objectives of the Element. When asked about support for the movement and access elements of the draft documents, four respondents suggested that they consider the train station to be unrealistic and two suggested general opposition for the draft ACP, whilst four suggested advocating for improved public transport, two supported the development of the train station and a number suggested pedestrian and cyclist improvements (see Figure 21).

The majority of respondents were over 55 years of age (69%) and/or were residents or property owners within the activity centre but still residents of the City of South Perth (54%).

#### 3.9.1 Comment

Traffic congestion remains a relatively high concern for the community. Section 2.6 and Section 2.8 provide some recommendations for ongoing communication.

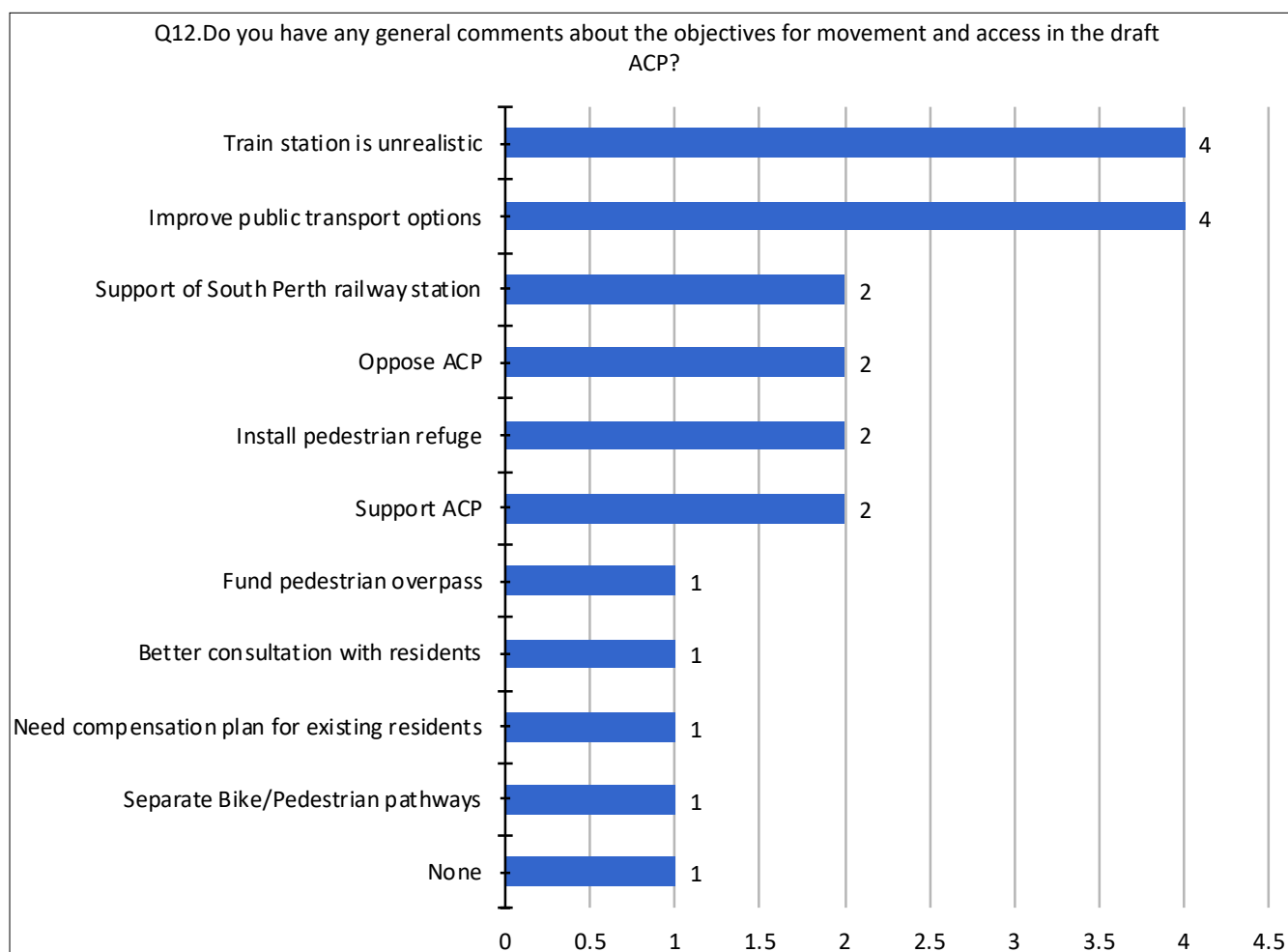


Figure 21 - Movement and Access Key element - General Comments

### 3.10 Public Realm

A total of 25 participants responded to this key element in the feedback forms.

The objectives of the plan are generally supported in this element, whilst 10 respondents expressed concern over the location or the governance of the mid-block links (see Figure 22).

Other comments included concern for the protection of green space and a query about the inclusion of the Perth Zoo in open space calculations.

A number of broad statements were made which generally suggest opposition to the draft ACP for reasons not related to this key element.

The majority of respondents were over 55 years of age (64%) and/or were residents or property owners within the activity centre but still residents of the City of South Perth (64%).

#### 3.10.1 Comment

More clarification on the governance and development of mid-block links will be required.

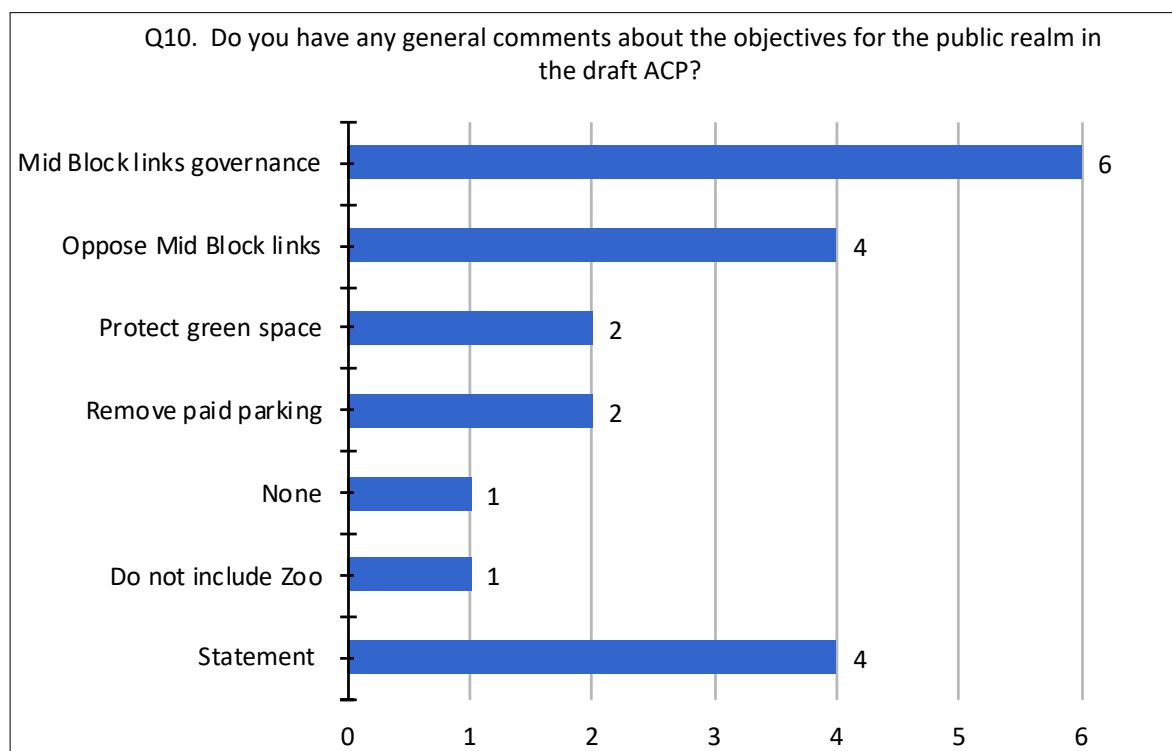


Figure 22 - Public Realm Key element - General Comments

### 3.11 General Comments

A total of 34 participants provided general comment.

General comments regarding Part 1 of the ACP include general opposition to the plan based on height, clarity, policy requirements and general opposition (see Figure 23). Some indicated a preference for greater flexibility in height, setbacks, podiums and floor to ceiling heights, whilst the tiering was also supported.

A similar pattern emerged regarding Part 2 of the ACP (see Figure 24).

General comments regarding proposed Amendment No. 61 focused more on allowing greater flexibility (eight), with nine responses generally opposing the draft documents and four generally supporting (see Figure 25).

The majority of respondents were over 55 years of age (70%) and were visitors to the activity centre (61%).

#### 3.10.1 Comment

This feedback form illustrates the diversity of opinions regarding the draft documents.

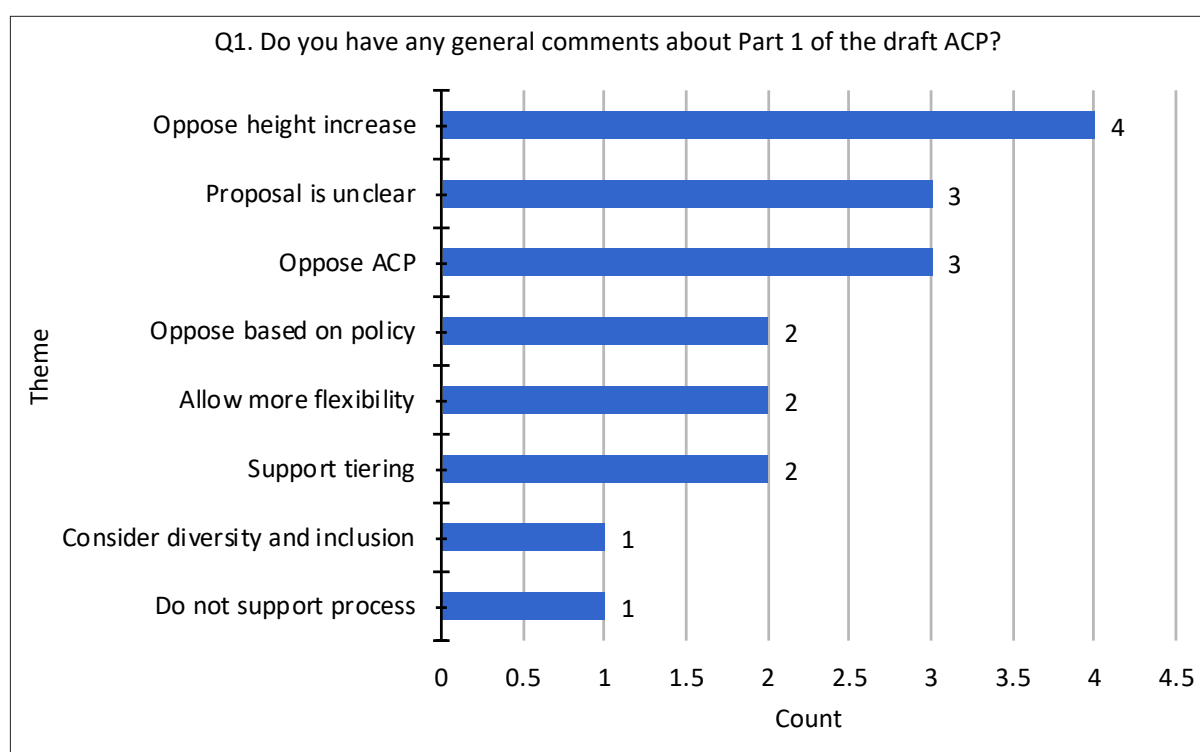


Figure 23 - General Comments draft ACP Part 1

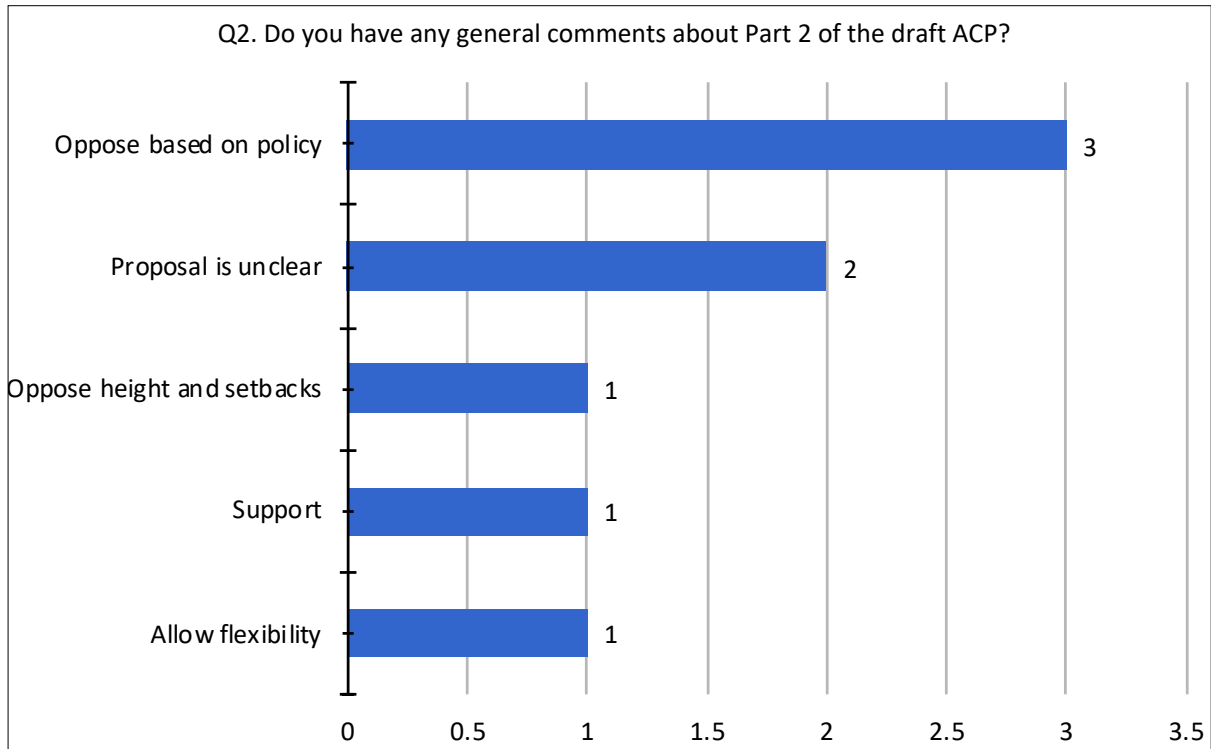


Figure 24 - General Comments draft ACP Part 2

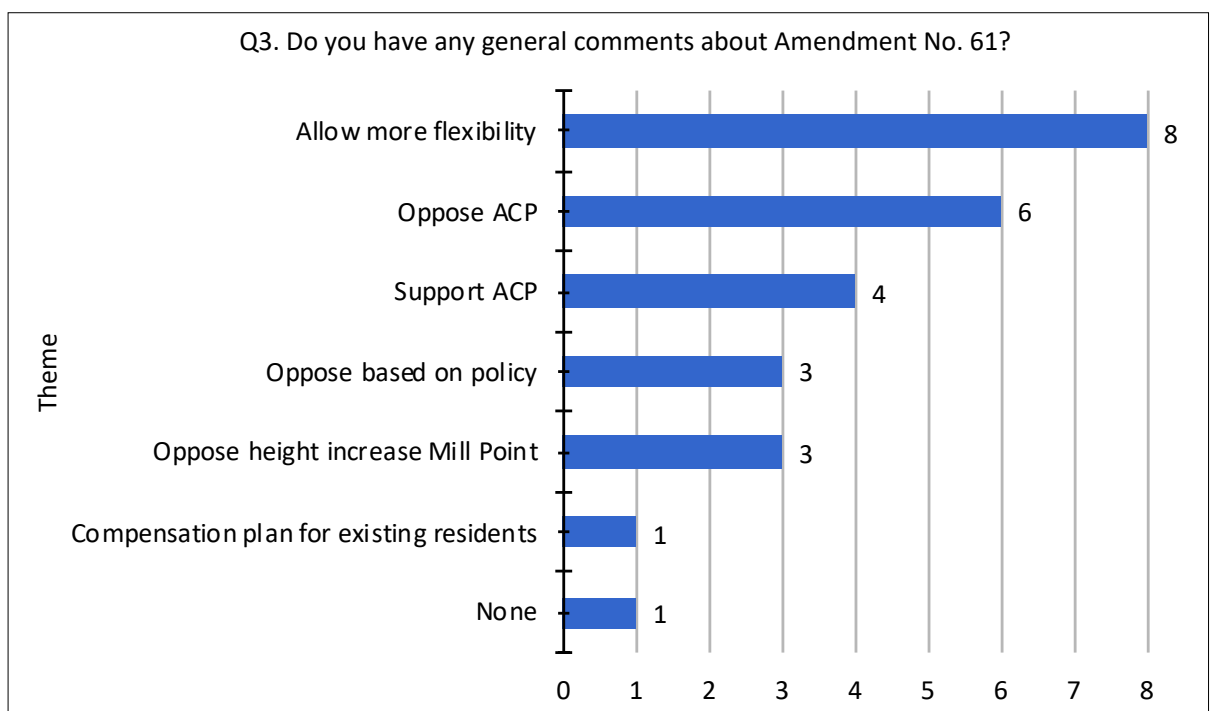


Figure 25 - General Comments proposed Amendment No. 61

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### 3.12 Local Planning Policy

A total of 6 participants responded to proposed P321.

Much of the concern expressed for the policy is related to the design competition component, the confidence in the assessment of design and the suitability of such a competition.

This has previously been considered in section 2.18 (see Figure 26).

#### 3.12.1 Comment

The process for endorsing proposed P321 is separate to the process for the draft ACP and proposed Amendment No. 61, as the process is largely controlled by the City rather than the Western Australian Planning Commission (WAPC).

Approval of the proposed P321 will be undertaken as soon as practical after the endorsement of the draft ACP and proposed Amendment No. 61. Proposed policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.

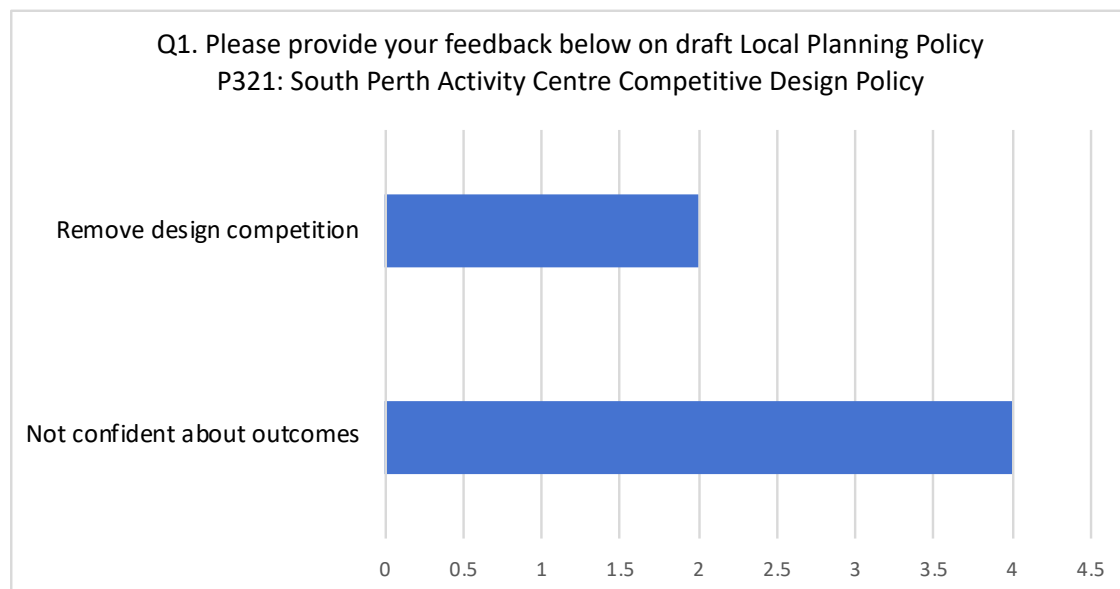


Figure 26 - Local Planning Policy - General Comments

### 3.13 General Feedback Form Summary

A total of 108 respondents participated in the feedback forms, with many commenting on multiple key elements and some responding to just one or two. Only 86 respondents provide age profile details as indicated in Figure 27. The most common age groups who participated were the 55-64 and 65+ age brackets, which was consistent across each of the key element response rates.

As accurately as can be analysed (not all respondents answered this question), only 30% of all responses were female.

Approximately 75% of respondents identified themselves as South Perth residents or property owners (the South Perth post code), some 18.5% identified themselves as residents within the City of South Perth local government area (e.g. Como, Manning, Waterford etc), whilst 6.5% of respondents identified as being from other Western Australian suburbs (see Figure 28).

From this we can determine that the feedback form feedback is highly localised to the study area, whilst we recognise that the responses over-represent males and people over the age of 55.

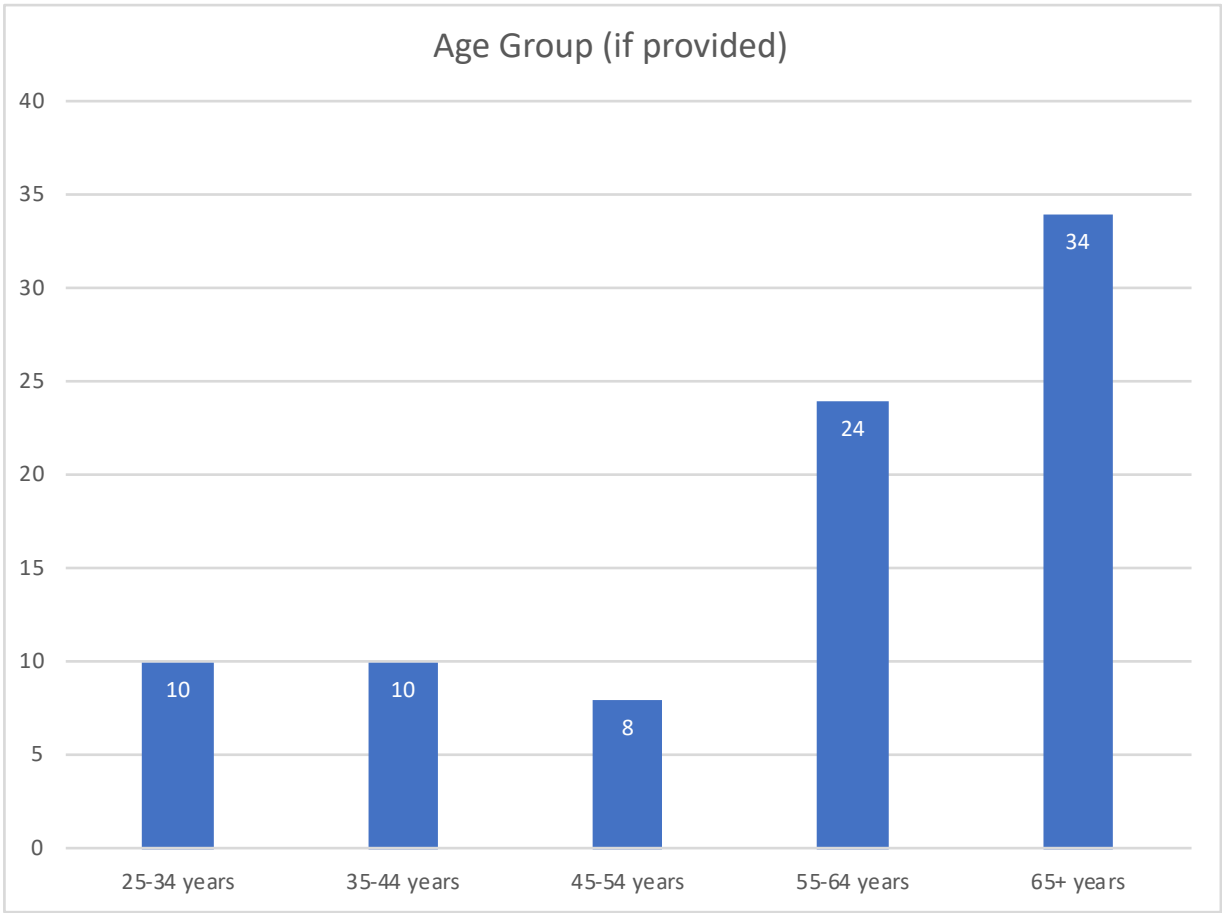


Figure 27 - Submission Age Distribution

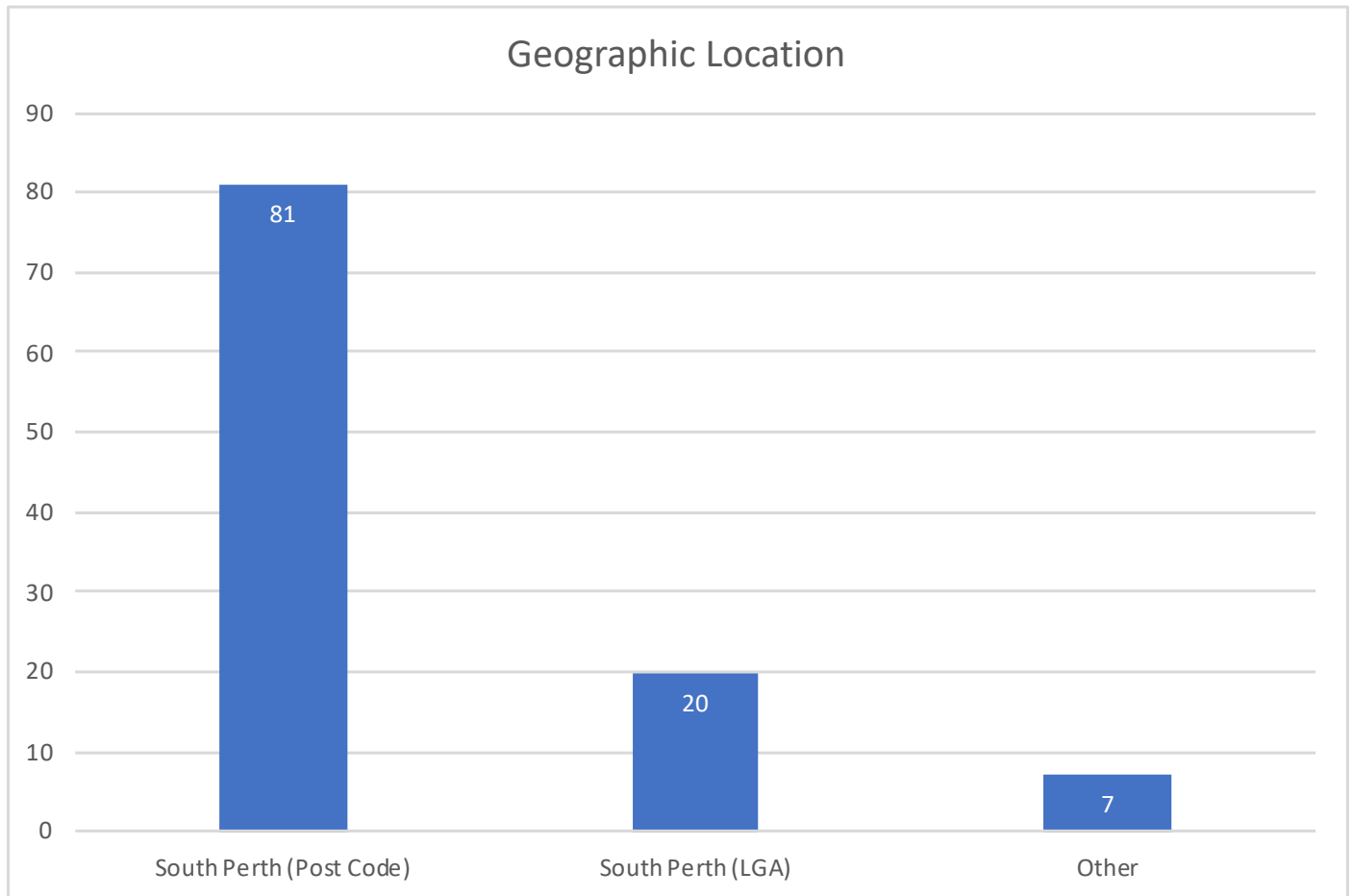


Figure 28 - Submission Geographic Distribution

# 4. Proforma Feedback Form Submissions

As indicated in Section 3, a large number of submissions were received in hard copy at the close of submissions. This consisted of :

- 115 proforma submissions seeking increased development rights on a specific site in the study area; and
- 436 proforma submissions seeking relaxed land use permissibility on a specific site in the study area.

The proforma submissions were identical, with the only variation being the name of the person who signed each form.

All 551 proforma submissions directly relate to The Peninsula Serviced Apartment development on South Perth Esplanade (see Figure 29).

These proforma submissions all refer back to a submission prepared by consultants Stewart Urban Planning. That submission is considered in section 5.11.

The primary interest of the Stewart Urban Planning Submission is that the subject site should comprise more development potential due to its proximity to the ferry terminal and its suitability for a high quality consolidated development.



Figure 29 - Peninsula Serviced Apartments Site (highlighted in orange)

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#### 4.1 Six-page submission (115)

The submission indicates support or strong support for the objectives of **Key element - Land Use**, but strongly does not support the requirements of proposed Amendment No. 61. The submission suggests that there should be no prohibition of serviced apartments (as these are already present) and that uses such as Hotel, Mixed Use, Serviced Apartment, Tourism Accommodation and Tourist Development should all be permitted uses in the area of the Peninsula Serviced Apartments site.

The submission indicates support or strong support for the objectives of **Key element - Building Size**, but strongly does not support the requirements of proposed Amendment No. 61. The submission suggests that there should be an increase in heights for the subject site to allow for 'High' building height type with the ability to seek Tier 2 heights.

The submission indicates support for the tower setbacks under this key element.

The submission indicates support for the objectives of **Key element - Podiums**, and provides neutral support to the requirements of proposed Amendment No. 61.

The submission indicates support or strong support for some of the objectives of **Key Element - Towers (although does not answer all objectives)**, and provides neutral support to the requirements of proposed Amendment No. 61. It strongly supports the tower floorplate requirements.

The submissions indicate general support for the objectives of **Key Element - Design Quality**, and provides neutral support to the requirements of proposed Amendment No. 61.

The submission indicates support or strong support for the objectives of **Key Element - Additional Development**, and provides neutral support to the requirements of proposed Amendment No. 61. The submission ranks upgrades to public open spaces first, followed by transport infrastructure; place making initiatives; community facilities; streetscape and public realm upgrades; and street trees and landscaping. It suggests additional benefits of expansion of the ferry pier, more ferry services, faster ferries and more ferry destinations.

The submission indicates support or strong support for the objectives of **Key Element - Bicycle and Car Parking**, but does not support the requirements of proposed Amendment No. 61. The submission suggests more encouragement of use of the ferry and facilitating transport oriented development, suggesting that parking requirements should be reduced.

The submission indicates support or strong support for **Key Element - Movement and Access**, but does not support the delivery of the train station.

The submission indicates that the focus on an unfunded train station will distract focus from improving the ferry services. The submission recommends that the objective be amended to read:

*'To establish the ACP as a transit oriented activity centre supported by multi-modal transit services and infrastructure, including the existing ferry terminal'*

The submission indicates general support for **Key element - Public Realm**, although it does not support the planting of more street trees.

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## 4.2 One-page submission (436)

The submissions focuses on **Key Element - Land Use and Key element - Building Size**.

The submission indicates strong support for the 'and use objective to establish uses *'with high employment, residential or visitor intensity around current and future nodes of transport'*.

The submission suggests that there should be no prohibition of serviced apartments (as these are already present) and that uses such as Hotel, Mixed Use, Serviced Apartment, Tourism Accommodation and Tourist Development should all be permitted uses in the area.

The submission further suggests that there should be and increase in heights for the subject site to allow for 'High' building height type with the ability to seek Tier 2 heights.

## 4.3 Proforma Summary

Both proforma submissions are heavily focused on the development rights and the surrounding context of a single site.

The building heights requested represent approximately double the current proposed allowance (in proposed Amendment No. 61) and more than five times the current permitted heights for the site under the current town planning scheme.

The vast majority of respondents have identified themselves as people who work in the activity centre, whilst their residential addresses are predominantly in other local government areas.

From the information we have about the respondents we can determine that the feedback form feedback is from visitors to the study area and is not representative of the residents or landowners of the study area or the broader City of South Perth.

Notwithstanding, this significant worker population has provided unique insight into the considerations of business owners and operators when considering changes to land use requirements in the study area.

Other considerations will be taken into account with the broader outcomes of the engagement period.

# 5. Consultant Submissions

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A number of technical and specialist consultants provided submissions on the draft ACP and Amendment No. 61, as well as proposed P321, during the engagement period. These were on behalf of themselves or specific owners in the area.

The key themes have already been summarised in Section 2, however, each requires a brief summary separately as these submissions generally focused on specific technical issues or sites.

## 5.1 Taylor Burrell Barnett

This submission was made on behalf of the Royal Perth Golf Club. It requests that the Richardson Character Area be extended to include the club house of the golf club.

Justification for this is based on the position of the club house at the gateway to the Activity Centre. It also highlights the role the club and facilities plays in attracting visitors to South Perth and the position of the club within walking distance of the proposed railway station.

Also raised by the submission is that the land is held in freehold and inclusion in the plan would allow opportunities to diversify their club operations and improve sustainability commensurate with the lease arrangements to run the adjacent golf course.

The submission suggests that the proposed amendment would only be minor and would not require further advertising or consultation.

The suggestion within the submission is that the height be listed as 'Medium-High consistent with other land fronting Labouchere Rd. Street setbacks are requested to be 2 metres to Labouchere Rd and 0-3 Metres to Amherst Street. It is also requested that the lot be shown as freehold in the public realm map to reflect its freehold status.

This submission proposes that minor modifications to the maps in Amendment No. 61 and the draft ACP be considered, adjusting the maps and the new Schedule 9B to include Lot 1 Labouchere Road to ensure that development controls apply to this freehold parcel.

It is suggested that this modification provides certainty as the future development of the site can be in keeping with the vision, objectives and relevant development requirements that apply to the rest of the draft ACP.

### 5.1.1 Comment

Notwithstanding the freehold nature of the club house land, no engagement has occurred which considers the Royal Perth Golf Club land, and it is thus not considered appropriate to extend the study area.

## 5.2 Mike Allen Planning

This submission suggests that the framework is not suitable for its purpose because it is based on an unjustified population estimate. The submission provides arguments that compare the activity centre area to Yanchep as a strategic metropolitan centre and suggests that South Perth will have a greater population.

The submission implies that as a result of the above, the draft ACP does not meet the requirements of State Planning Policy 4.2 (SPP). The submission also suggests;

- That car parking maximums should be reduced to reflect changing patterns of usage;
- That affordable/social housing should be promoted;
- The intersection of Judd Street and Mill Point Road is unfriendly for pedestrians and this should result in development to the north of Judd St being kept low;



- 
- That Richardson Street heights are predicated on a railway station being built, therefore until the station is built there is no justification for the intensity;
  - That the height of buildings is not of human scale and should remain at 8-12 stories which would still achieve high population densities and
  - That podiums are an unacceptable outcome with high blank walls to provide car parking.

Support is given to the tower setbacks and separation though some hesitation is noted on the effectiveness of the gross floorplate areas in allowing taller more slender buildings. Similarly, the effectiveness of plot ratio on larger sites is questioned.

In terms of Amendment No. 61 the submission reiterates some of the main concerns raised in relation to the draft ACP. It also suggests

- That the massing proposed around the ferry terminal cannot be justified by the current service;
- That the areas of Richardson Park not used as sports grounds should be made available for development due to their proximity to the proposed rail station (notwithstanding earlier comments about the rail station development);
- That commercial such as small scale shops should be concentrated on the Mends area rather than dispersed throughout residential areas; and
- That other land uses such should be prohibited or discouraged including student housing and convenience store in Hillside and Richardson, and office, educational establishment and small bar in Mill Point and Hillside.

### 5.2.1 Comment

The population estimates set for the ACP area have been the subject of detailed investigations and are not considered negotiable.

Notwithstanding the broader concerns about the height and scale of development in the area, the submission does not appear to adequately interpret the intent or limitations of State Planning Policy 4.2 (the SPP) or recognise that activity centre planning is highly contextual.

### 5.3 Element

This submission primarily responds to the proposed podium setbacks in the context of 9-11 Harper Terrace. It proposes reducing the podium setback to nil on Harper Terrace and the South Perth Esplanade as opposed to '5.0m from road carriageway kerb line or as per Map 3 (whichever is greater).'

The submission argues that the nil setback to lot boundaries on the streets for these and other sites provides opportunity for continuous building edges, active street frontages, awnings to provide shelter, clear sight lines, and a human scale that distracts from the tower elements.

It suggests that developments on the southern lots on Harper Terrace have been built with a nil podium setback, and adhering to the same provisions would be suitable.

The submission points to the role of Harper Terrace as a pedestrian connector between the Foreshore and the Civic Heart with a role as a main street and active street interface.

### 5.3.1 Comment

The podium setbacks proposed have been established based on detailed analysis of the street network. Further investigation is required to understand if a variation to the proposed setback would achieve the outcomes suggested by the submission.

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## 5.4 Planning Solutions

This submission is made on behalf of Yurnga Apartments, stating opposition to proposed Amendment No. 61 as;

- The base height allowances proposed by the amendment reduce the permissible height of the subject site from five storeys to four storeys;
- The bonus height requirements, particularly the public contributions, are onerous to the extent that it is unviable to develop the additional storey and provides a barrier to developing to five storeys;
- The public contribution requirements are not backed by a community infrastructure plan, or costing or identification of the types of community infrastructure that would be required;
- The removal of the exercise of discretion is unreasonable and has the potential to cause unintended restrictions on development; and
- The amendment is overly convoluted and confusing.

The submission suggests that the development controls be modified to allow new development at the same yield as currently permitted.

There are several suggested improvements provided in the submission if the amendment is continued.

These include changes to clauses associated with:

- Bonus Height Contribution (clauses and maximum dollar value);
- Permissible heights (increase in base heights, increase in Tier 1 heights and increase in height types);
- Street setbacks (inclusion of balconies and reducing overall setbacks); and

- Side setback discretion (modified setbacks, setbacks based on average rather than minimum and increased discretion):

### 5.4.1 Comment

The heights proposed have been established based on detailed analysis of the precinct and the existing permitted heights. Further investigation is required to understand if a variation to the proposed precinct would achieve the outcomes suggested by the submission.

## 5.5 Zone Q

Zone Q made a submission in relation to the properties between 86-90 Mill Point Road.

The submission requests a change from prohibited to discretionary for the land uses of indoor sports activities, serviced apartment and shop.

The submission supports the proposed building heights in relation to the subject site however it expresses concern regarding the criteria for achieving Tier 1 and Tier 2 including contributions and design quality criteria.

There is also a request within the submission for heights of properties between 49-63 South Perth Esplanade to be reclassified as 'low' height area to provide consistency along the foreshore.

The submission suggests that setbacks for podiums in the Mill Point Road precinct are excessive and should be limited to the base setback requirements.

The submission also suggests that continuity of the streetscape could be better achieved through a standard 3.0m setback across all frontages of the subject site and increasing the setbacks to 5.0m north of Ferry Street. Discretion to allow variation to the setbacks is also encouraged.

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The submission supports a standard 4 metre setback to towers and suggests the 5% of overall building height will not achieve any significant difference. The submission also supports the tower maximum gross floor plate area, as a way of achieving more slender developments.

The effectiveness of plot ratio is questioned in the submission, however if it remains in the draft ACP then the current ratios are considered suitable provided that car parking is removed from the calculations.

The submission does not support the need for design competition to achieve Tier 2. It considers the time, and cost to be unsustainable and considers that design review will achieve the same results.

The additional requirements for public benefit are also questioned by the submission especially in terms of its simplistic response to a framework and uncertainty about how funds will be utilised. It supports a more robust framework as defined in Design WA.

Other issues canvassed in the submission include the street interface and complexities for the subject site. It also suggests the deep soil zones be reduced to reflect the intense urban environment.

#### **5.5.1 Comment**

The heights proposed have been established based on detailed analysis of the precinct. Further investigation is required to understand if a variation to the proposed precinct would achieve the outcomes suggested by the submission.

### **5.6 Hillam Architects**

This submission comments upon four significant projects within the precinct. It supports the proposed framework generally but considers that maximum building heights are unnecessary as other requirements will limit height. The submission supports the design review panel.

The submission suggests that proposed Amendment No. 61 improves on the ambiguity of the current planning framework and provides more certainty for applicants with particular reference to the proposed public benefits contribution scheme.

It does, however, suggest that there are an excessive number of planning controls that will hinder design flexibility and innovative built form proposals. It also raises concern with the tiering system and maximum floorplate area reductions, suggesting an incremental reduction in floorplate area of 0.5-1% reduction per additional floor to encourage varied building heights across the draft ACP area.

Other suggestions include:

- Non-residential plot ratio to be included in the draft ACP not proposed Amendment No. 61;
- Car parking be excluded from plot ratio;
- Reduce podium setbacks in Mill Point and Hillside (development viability);
- Flexible application of podium heights (to provide sufficient space for services);
- That inset balconies do not form part of plot ratio calculations;
- That the contribution scheme not apply if the plot ratio is below the base level; and
- That a design competition should only apply to large public sites.

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### 5.6.1 Comment

The provisions proposed have been established based on detailed analysis of the precinct, to achieve exemplary design quality. This reflects the scale and significance of development above the Tier 1 limits.

Proposed policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.

### 5.7 Responsive Environments

This submission is related mainly to an interest in the Mill Point Peninsula and suggests the plan is based on an unjustified population estimate and that future development of tall buildings needs to be limited to the potential station precinct area.

The submission contends the Peninsula should be removed from the ACP and as a new station is unlikely to be built in the lifetime of the plan the role of the activity centre will not be realised.

Seven issues are raised in the submission:

1. Overstating the role of the draft ACP. The submission argues that the plan treats South Perth as more significant than its stated scale in the SPP.
2. Plan Overreach. The submission claims there is a mismatch between dwelling allocation, forecasts and projected supply in the draft ACP. It suggests that housing needs are already being met.
3. Consolidate area. The submission suggests the plan is over ambitious, limiting future development to outside the walkable catchment of a future station.
4. Mill Point Peninsula – Excessive Allowable Height. The particular interest in this submission is the Mill Point Peninsula. The

submission suggests that proposed heights in this area are not in accordance with the Activity Centre Plan Character Statement of a 'similar scale'. The submission suggests that the potential towers would change the character of the immediate area and impact the natural beauty, heritage and urban form of the area.

5. Bonus height System. The submission suggests that the proposed provisions are imprecise and overlapping.
6. Misapplication of the Design Competition Device. The submissions suggests that the use of design competitions as an extension of design review will allow tall buildings with bonuses that far exceed any responsible benefits of design excellence.
7. Developer benefit. The submission suggests that the draft documents are of more benefit to developers, rather than the community.

#### 5.7.1 Comment

The population estimates set for the draft ACP area have been the subject of detailed investigations.

If future demand and growth is not well understood and reflected in the planning framework, there is a high risk that responses to actual demand and growth will not fit within the established vision, particularly if demand is underestimated at the strategic planning stage.

Notwithstanding the broader concerns about the height and scale of development in the area, the submission does not appear to adequately interpret the intent or limitations of State Planning Policy 4.2 (the SPP) or recognise that activity centre planning is highly contextual.

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## 5.8 Sirona Capital

This submission raises a number of concerns, as follows:

- Building height is generally supported, however, it does suggest that there is no need for a maximum height limit to be set for Tier 2, allowing for greater innovation in design and a more diverse skyline character;
- Side setbacks at 4 metres are considered to be less flexible than required. There is a suggestion that an inflexible approach will create unusable and unsafe areas;
- Podium height provisions under TPS6 be retained and site cover be increased to 80%-90% or removed entirely;
- Tower setbacks are generally supported in the submission with some concern about the increase in setbacks over 80 metres in height;
- Floor plate provisions should achieve the results being sought, but suggests that the Tier 2 requirements for tower floor plate be increased to 40% for the Mends, Richardson and Mill Point Character areas. The suggestion is also made that sunshade and architectural features be not included in the floorplate or setback calculations;
- Plot ratio is unnecessary with other controls in the frameworks, also suggesting that the inclusion of car parking in the ratio is misleading in terms of how generous the ratios seem;
- The requirement to go to design competition is seen as being too onerous in the submission. The submission maintains the Design Review Panel will achieve the desired results;

- There is concern that the community benefit proposals will be expensive and that it lacks transparency; and
- Plot Ratio requirements for non-residential is unnecessary.

Other issues not supported include;

- The dwelling diversity percentages;
- The 2 metre length for blank walls;
- The 6-9 metres street frontages for individual ground tenancies;
- The limitations of defining floor to ceiling heights;
- The commercial car parking; and
- Restricted crossovers per developments.

The submission also raises concerns about the interface with heritage buildings considering that provisions are already covered in other legislation.

The submission considers that conditions relating to 40% landscaping and planting on structures e.g. podiums, roof tops and green walls provide more realistic opportunities in an inner urban setting than deep soil zones.

### 5.8.1 Comment

The provisions proposed have been established based on detailed analysis of the precinct. Further investigation is required to understand if a variation to the proposed precinct would achieve the outcomes suggested by the submission.

## 5.9 Edge Living

This submission is primarily concerned with 74 Mill Point Road, suggesting that properties within the Amendment 46 Special Design Area not be included in the highest building height limit with Tier 2 potential, which suggested to be inequitable.



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The submission suggests that setbacks of 8-9 metres in Mill Point and Hillside are unviable and not appropriate for commercial tenancies. The submission also suggests that restricting podiums to 2-3 storeys is conservative and combined with measuring car parking above ground as plot ratio, will drive parking below ground at high cost.

The submission raises concern regarding relaxed building height limits that block views from existing development sites. The attempts to tier building heights down the Esplanade is recognised but is not considered restrictive enough in the context of the existing permitted provisions.

The submission suggests a 0.5-1% reduction be applied incrementally as building height increases. It is also suggested that the floor plate maximum for towers be increased to 50%.

The submission opposes the mandated design competition for cost reasons. General support was given to the contribution scheme however the suggestion is made that it should not apply if plot ratio is below the base limit.

#### **5.9.1 Comment**

The provisions proposed have been established based on detailed analysis of the precinct, to achieve exemplary design quality. This reflects the scale and significance of development above the Tier 1 limits.

Proposed policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.

#### **5.10 Hanny Properties**

This submission refers to properties at 9-11 Harper Terrace, South Perth and requests several modifications. The submission requests

- 'High level residential aged care facility' be modified to be a permissible use (P or D).
- Mixed development be modified to be a permissible use (P) or removed completely.

The submission supports the medium height type proposed for the site as well as the transitioning of height downwards from Mill Point Road the Esplanade, requesting sites adjacent to the 'High' between Ferry Street and Ray Street be changed to Medium-High similar to the lots immediately north of Ferry Street.

Nil setback on Harper Terrace is supported, as opposed to 5 metres from the street kerb. The submission suggests providing a continuous building and site line will allow better activation and permit awnings to provide a better pedestrian environment. Similar suggestions are made for the lot frontage addressing the Esplanade.

The submission suggests that podium heights, boundary wall heights and boundary wall lengths are restrictive given the need to accommodate non-residential floorspace, car parking and other need. It is suggested to increase to a building height of 13.5 metres.

Other issues addressed include;

- Not including sun shading devices and cantilevered balconies in setback areas;
- That maximum floor plate areas where Tier 2 additional height is to apply should only apply to that Tier and should be increased to 40%;
- Not including car parking above ground and residential stores in plot ratio;

- 
- Utilising design review rather than design competition;
  - That the requirement for a public benefit contribution to the value of additional should be more consistent with Design WA requirements;
  - That non-residential plot ratio be reduced to 0.5 as the current provision of 1.0 is too onerous;
  - That dwelling diversity requirements should be modified to remove single bedroom and 3 or more bedroom requirements;
  - That individual ground floor tenancy restrictions should be removed;
  - That the requirement for blank wall not to exceed 2 metres should be increased to 5 metres;
  - That a minimum floor to ceiling height of 2.4metres for non-habitable rooms be added;
  - That commercial car parking ratios be reduced; and
  - Allowing more than 1 crossover.

The submission also specifically states support for 65 South Perth Esplanade to be included in the Mends Character Area.

#### 5.10.1 Comment

The provisions proposed have been established based on detailed analysis of the precinct. Further investigation is required to understand if a variation to the proposed precinct would achieve the outcomes suggested by the submission.

### 5.11 Stewart Urban Planning

This submission largely concerns itself with the site of the Peninsula Serviced Apartment development on South Perth Esplanade (see Figure 29). It is referred to in all of the proforma submissions discussed in section 4.

The submission broadly suggests that the ACP fails to facilitate transit oriented development of a suitable scale adjacent to the public transport node of the ferry, notwithstanding that the submission generally supports the ACP in principle.

The submission has four key focus areas:

1. That the draft documents do not support adequate transit oriented development character and land use;
2. That the draft documents do not achieve suitable density distribution adjacent a key public transit node;
3. That the draft documents do not facilitate density development on a highly suitable site with land assembly opportunities; and
4. That the draft documents fail to support State policy requirements.

The submission suggests that the current framework will encourage sub-optimal design outcomes, where high quality design could be achieved.

The submission provides a number of recommended solutions to these focus areas, including identifying the site as the 'High' height type, enabling Tier 2 development and supporting a number of variations or discretion applied to the planning requirements.



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The submission also suggests some additional modifications to bring the draft documents into line with the Design Elements of State Planning Policy 7.3 – Residential Design Codes Volume 2 – Apartments, including deep soil zone requirements.

#### **5.11.1 Comment**

The subject lots do represent a large development site. However, the lots are on separate titles and there is no guarantee that they would be developed as one parcel, and the site is already well developed with accommodation infrastructure.

There may be some merit in this site being subject to an independent and more detailed planning study, once development of the site is more imminent and when proposed yield and design outcomes can be more objectively discussed.

Notwithstanding, the submission does not appear to adequately interpret the intent or limitations of State Planning Policy 4.2 or recognise that activity centre planning is highly contextual. Transit oriented development exists at varying scales across the networks, and all scales are valid, subject to an appropriate planning process.

# 6. State Government Agency Responses

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A number of State Government Agency and service authorities provided submissions on the draft ACP and Amendment No. 61, as well as the proposed Local Planning Policy, during the engagement period. These were on behalf of themselves or specific owners in the area.

These have already had key themes summarised in Section 2, however, each requires a brief summary separately as these submissions generally focused on specific technical areas.

## 6.1 Tourism Council

The submission from the Tourism Council requests that additional works should be undertaken to activate the waterfront as a tourist destination in its own right as well as in recognition of its dual role with Elizabeth Quay.

It also raised the Department of Transport assessment of ferry services which recommended State Government agencies and local authorities support tourist projects, encourage higher density living close to the river, and plan for waterfront redevelopment and increased land use activity in nodes along the river foreshore.

The Council strongly urges the implementation of the draft ACP and Amendment No. 61 to be supportive of transit-oriented development outcomes around the ferry. Stating that it would be very disappointing if there are any implementation elements prohibitive of such outcomes.

The submission also noted that the Peninsula Apartments should be in the mixed-use Mends Character area and also recommend that uses such as Hotel, Mixed Development, Serviced Apartment, Tourist Accommodation, and Tourist Development be permitted not merely discretionary.

## 6.2 Department of Water and the Environment

The submission from the Department for Water (DWER) encourages future planning and land development to incorporate water sensitive design principles and consider integrated water cycle management, including water supply and efficiency, groundwater, storm water, wastewater, flooding, waterways and wetlands, consistent with the Better Urban Water Management (WAPC, 2008) framework.

DWER therefore supports the above actions / requirements, to ensure that early consideration is given to building and basement design and site dewatering requirements, including how the discharge of water will be managed by the local government and/or construction contractors to avoid any risks of impacts to surrounding users and the environment. It should be noted that DWER does not advise on groundwater clearance requirements or dewatering disposal methods.

DWER suggests that the following additional water resource management opportunities and constraints are also considered in the draft ACP, particularly within Section 3.3.4 Sustainability, Landscaping and Water Management;

- DWER encourages the incorporation of Water Sensitive Urban Design principals including opportunities to retrofit existing storm water infrastructure, which can lead to improved water management, natural features and use of public open space, enhanced recreational opportunities and reduced flooding risk
- Groundwater resources in the area are approaching their sustainable limits and therefore DWER recommends that the ACP should encourage water conservation and efficiency measures to reduce demand on groundwater resources.

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This may include the requirement for development proposals to identify non-potable water requirements and water source availability for development, as well as implement water efficient Open Space and landscaping design and irrigation practices and consideration of alternative water sources.

- Ensure that DWER's guiding principles for floodplain management apply;
  - Proposed development has adequate flood protection from a 1 in 100 (1%) Annual Exceedance Probability (AEP) flood
  - Proposed development does not detrimentally impact on the existing flooding regime of the general area
  - Consideration of the cumulative impact of individual developments on the floodplain
- Proposed development should avoid areas of native vegetation, waterways and their foreshore areas, wetlands and other significant environmental assets. The loss of canopy cover on private lands as a result of infill development is a concerning trend. Requirements to retain mature trees and adequate space for tree replacement and growth is important to maintain biodiversity, curb the heat island effect and provide amenity.

### 6.3 Department of Planning Lands and Heritage (Heritage)

A submission was made by the Department of Planning Lands and Heritage specifically in relation to Heritage. It was noted that the Heritage section of the draft ACP should include a list of State Registered Places.

- P4795 Narrows Bridge
- P2394 Old Mill
- P2390 South Perth Police Station (fmr)
- P2389 Old Mill Theatre
- P2393 Old Council Offices
- P2392 Windsor Hotel
- P4689 Stidworthy Residence (fmr)

It was also noted that the Amendment Report, Section 5 Policy Framework should include reference to SPP3.5. Historic Heritage Conservation

The submission notes that although Perth Zoo is not yet on the State Register of Heritage Places, it has been identified by the Heritage Council as a place of interest and we have begun progressing its registration.

It is suggested by that the allowable building height for the blocks immediately opposite the Zoo between Hardy and Richardson Streets will have an impact on the micro-climate of the Zoo and its significant botanical plantings. Consideration therefore should be given to ensuring that potential for shadow cast by tall buildings on these blocks will not have any impact on the gardens within the Zoo's boundary.

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## 6.4 Main Roads WA

Main Roads WA (MRWA) has a concern about the impact of the draft ACP on the Freeway and request that the transport modelling be provided to allow for further comment and determination of the impact on the State network. It was noted that the report on traffic identified the Freeway on-ramp at Labouchere Rd and Mill Point Rd is at capacity.

The intention to change modes of travel was recognized and they request further discussion on how this is to be achieved.

The reduction of car parking spaces in activity centres was acknowledged as a State direction and therefore it was recommended by MRWA that a maximum rate of residential car parking of 1 bay per apartment should be implemented. It was also recommended that the City investigate a maximum rate for commercial car parking that is based other states and/or localities with similar inner-city locations.

MRWA indicated that bicycle parking and end-of-trip facilities should be encouraged further. It is recommended to increase the rate of bicycle parking. There was also a query seeking clarification of the terminology of 'bike bay'.

It was noted that further approval would be needed from MRWA for any local traffic treatments proposed and any new signals would require specific approval from MR Network Operations.

The City was also advised that State Planning Policy 5.4 Road and Rail Transport Noise and Freight Considerations in Land Use Planning is required to be considered in any developments in proximity to the Freeway.

## 6.5 Department of Education

The Department of Education (the Department) acknowledges that the City has taken into account the Perth and Peel @3.5million planning framework document as part of its assessment of dwelling targets and identifying potential growth areas and adopted a locally based forecast for population and dwelling growth which is in line with the target in Perth and Peel @3.5million.

The Department advised that it is currently undertaking a separate review of the Perth and Peel @3.5million documents which includes the Central Sub-Region to identify the challenges for the future public education system of Western Australia and a range of priorities to take action on to ensure that there is sufficient provision of public primary and secondary schools to cater for the future student population. They advised that this still may have implication on the draft Local Planning Strategy and draft ACP.

The Department will collaborate with the City after completion of this review to address any matters relating to public schools that may arise from the review.

## 6.6 Department of Fire and Emergency Services

The department advised that the proposed LP/247- South Perth Activity Centre does not fall into an area designated as bushfire prone pursuant to the *Fire and Emergency Services Act 1998* (as amended) as identified on the *Map of Bush Fire Prone Areas*.

# 7. Stakeholder Reference Group

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The Stakeholder Reference Group (the SRG) was the first of the final workshopping activities to conclude the engagement process.

As the SRG has been involved at a number of points through the preparation of the draft ACP and proposed Amendment No. 61 their feedback was important in helping inform the finalisation of the draft documents.

Members were provided with information regarding the broader engagement outcomes and a summary of information and some of the high levels details summarised in Section 2 of this report.

They were also provided with all fact sheets containing necessary information for the session and information that linked to the key themes which had been evident in the broader engagement. So that the workshop outcomes would respond to the major areas of divergence from the community, these key themes formed the basis for the design of the workshops.

## 7.1 The Remit

The SRG were provided a remit for the workshop sessions as follows:

*The South Perth Activity Centre is planned to support a significant increase in population with increased in height and density and increases in community activity and vibrancy*

*Increased development is already, and will continue to occur in the precinct.*

Given this:

- What improvements can be made to the guiding frameworks for the development of the South Perth Activity Centre?

Members were advised that there was limited opportunity to consider:

- Yield/distribution of development;
- Setbacks of towers; and
- Setback of podiums.

Members were also advised that trade-offs and rationale should be considered for all changes.

## 7.2 Summary of Activities

A detailed summary of the SRG is provided in a separate report. This section provides an abridged version of that summary.

The panellists were provided a presentation explaining the background of the draft ACP and proposed Amendment No. 61 and the advertising process that was undertaken. There was also feedback on the responses from the broader community.

A presentation was also provided from Peter Ciemetis of Roberts Day, regarding specific design outcomes of the draft ACP, podium setback requirements and other panellist questions.

Group discussions were held after each presentation to relate what had been presented to the draft ACP frameworks and gain a better understanding of what impact if any these had on the approach to the process or concerns regarding the draft documents.

### 7.2.1 Observations from Day 1

Day 1 was designed to illicit feedback on key areas of concern with the draft documents. The SRG was invited to provide broad feedback that would also help the project team to design the focus of the Community Panel workshops. Initial discussions from Day 1 are summarised in this section.

- 
1. The SRG do not have an aligned position on the draft documents. Approximately half of the SRG support and the other half do not support the frameworks.
  2. Notwithstanding, the SRG generally reiterated the importance of:
    - High Quality Development
    - Open space and trees
    - Tourism
    - Activation of streets
    - Liveability
    - Accessibility
    - Vertical community that is inclusive and walks
  3. Most members of the SRG supported the graduated heights proposed by the frameworks.
  4. Design review and quality are considered very important, although some do not support the design competition component (others are highly supportive).
  5. Concerns exist for the transition of the area vis-a-vis the ongoing amenity of existing residents.
  6. Concerns exist regarding the parking requirements, including the reality of basement parking (water table issues) and the importance of improved public transport infrastructure as a means of underpinning reduction in private vehicle use.
  7. Podium development was identified as a major concern. Participants pointed to some of the newer podiums and the impact on the adjacent streets. Setbacks need to be clarified.
  8. Innovation was identified as very important, including consideration of electric vehicles/ charging stations and elevated spaces.
  9. Public spaces, green spaces, community hubs and place making were all identified as important.
- ### 7.2.2 Observations from Day 2
- Day 2 more thoroughly considered the key themes and topics from the first session and the outcomes of the first day of the Community panel (held the previous week). This session focussed specifically on areas within the ACP and proposed Amendment where changes or improvements could be made.
- The resultant suggestions were interrogated by the group before the group as a whole agreed through polling the outcomes that were broadly accepted by the whole group.
- ### 7.3 Recommended Modifications
- The recommended changes from the SRG are one element to be considered in the final recommendations for improvements to the draft ACP and proposed Amendment No. 61.
- Figure 30 illustrates the SRG recommended changes. Following this, detailed comments are provided regarding the proposed changes where provided.
-



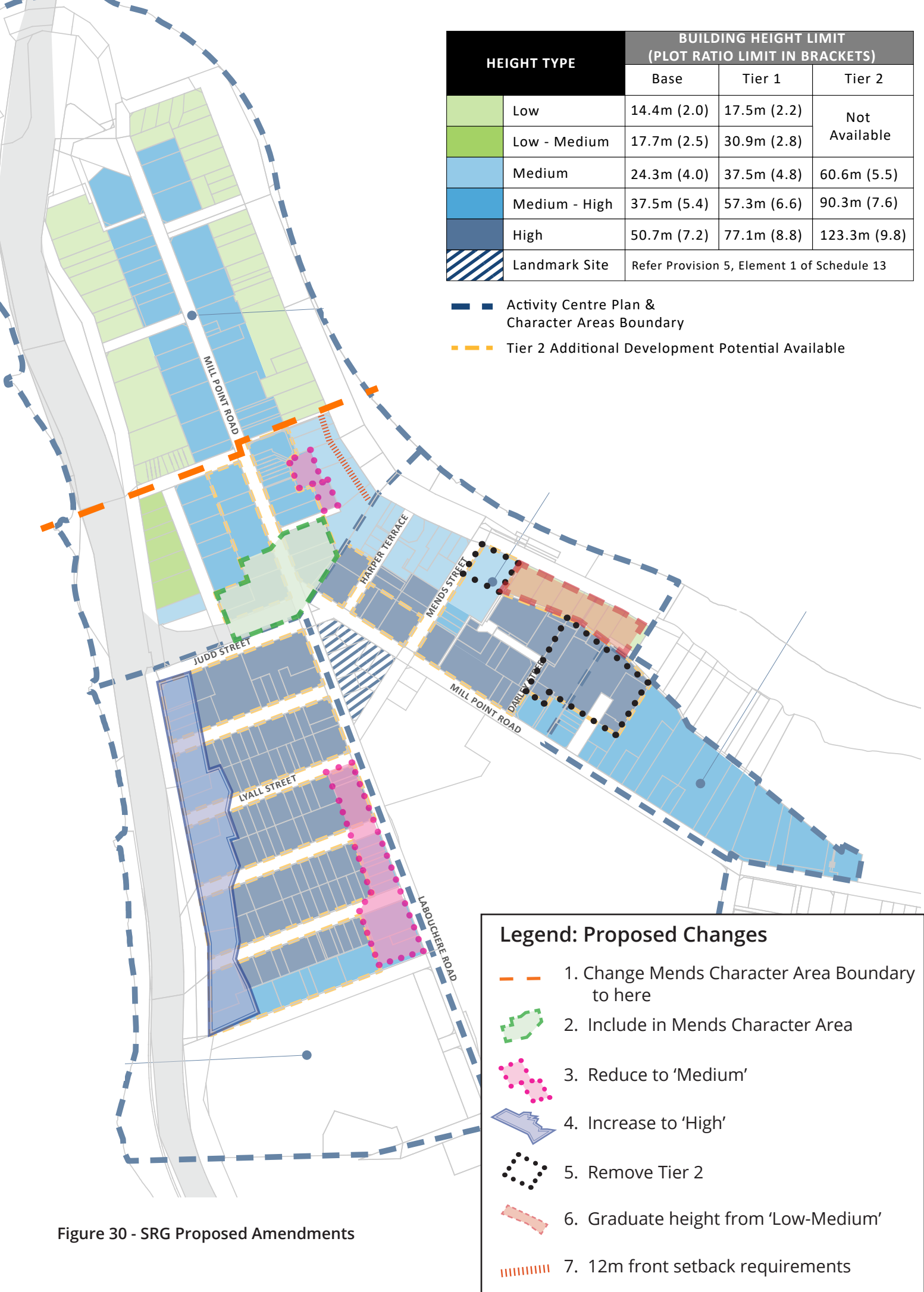


Figure 30 - SRG Proposed Amendments

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To support the map in Figure 30, the SRG provided the following comment.

#### **7.3.1 Mends Street Character Area Boundary**

There was some discussion about the boundary of the Mends Street Character Area, with one suggestion to change the boundary to the north to Frasers Lane/Scott Street (1 on Figure 30) and another group suggesting to include the area roughly to Ferry Street (2 on Figure 30). Both suggestions were met with high levels of support and it could be considered that either would be supported by the SRG.

#### **7.3.2 Changes in Height**

Four changes were suggested.

One group suggested that the Mill Point Road corridor to Frasers Lane/Scott Street be increased to 'High'. However, this option was not supported by the majority and is not reflected in Figure 30.

A second area was identified as being suitable for reduced height between Ferry Street and Frasers Lane (3 on Figure 30) by two groups which was supported. In addition, some land on Labouchere Road frontages were suggested which was also supported.

There was also a suggestion to increase the permissible heights to the waterfront properties on Melville Parade, to reflect the current permissible heights in this location (being taller than adjacent properties) (4 on Figure 30).

Tier 2 height opportunity was proposed to be removed from two locations, at Mends Street to mirror the other side of the road and between Darley Street and just beyond Parker Street. Both options were suggested as a way of providing graduated heights from the centre (5 on Figure 30).

Finally, the lots along South Perth Esplanade southeast of Mends were identified as being too low for lots in such close proximity to the ferry, and with too significant a change from the adjacent properties. The SRG suggested that the heights graduate from 'Low-Medium' down to Low in this area which was supported (6 on Figure 30). The SRG also mentioned that the side setbacks in this area could be more flexible than currently shown to allow for good design outcomes.

#### **7.3.3 Land Use Changes**

A number of SRG members suggested that the permissibility of Serviced Apartments and Aged Care facilities should be changed to allow these uses in the Mill Point precinct. No members disagreed with this principle.

#### **7.3.4 Front Setbacks**

One group identified the front setback along South Perth Esplanade Between Frasers Lane and Harper Terrace as too narrow, requesting the draft documents be amended to require a 12m front setback here (7 on Figure 30) consistent with the rest of the street to the north (the current proposed setback is 3m, plus an additional 3m for podium development).

#### **7.3.5 Additional Suggestions**

In addition to the agreed recommended changes noted on Figure 29, the SRG provided the following additional comments which received high levels of support from the majority of members:



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### Podiums

- Reduce minimum to 2m
- Require average as currently proposed, but allow the placing of the podium within the site to be in the best location (rather than defined setbacks to specific boundaries) to provide best design outcome as determined through the design review process.

### Towers

- Tier 1 and Tier 2 - graduate percentage of footprint size as the tower gets taller rather than the base and tier setbacks. Allows for greater diversity in built form and does not artificially limit development to tiers when a small amount of additional height could be achieved.
- Increase outer setbacks to allow for deeper balconies - enclosed area as per current proposal.

### Parking

- More public parking.
- Short stay/serviced apartments 3 bays per 10 suites.
- Do not measure bays as plot ratio.

### Heights

- Should be expressed as storeys, not height in metres.

### Competitions

- Should not be required for private land (public land is ok), but these building designs should go to the State Design Review Panel.

## 7.4 SRG Summary

Recommended changes are to be combined with the same exercise undertaken by the Community Panel, plus feedback from the broader engagement.

Together, these suggestions will feed into the broader engagement to guide the final modifications to the draft ACP and proposed Amendment No. 61.

# 8. Community Panel

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The Community Panel (the Panel) was the final activity of the engagement process. The panellists were provided with a detailed collation of the broader engagement outcomes but were also provided with a summary of information and some of the high levels details summarised in Section 2 of this report.

They were also provided all fact sheets containing necessary information for the session, biographies of speakers and information that linked to the key themes which had been evident in the broader engagement.

A total of 44 participants were selected and 42 panellists completed the two-day Community Panel.

## 8.1.1 The Remit

Panellists were provided the same Remit for the panel sessions as provided to the SRG (see Section 7.1).

## 8.1 Summary of Activities

A detailed summary of the Community Panel is provided in a separate report. This section provides an abridged version of that summary.

The panellists were provided a presentation from:

- City officers, to describe the background of the draft ACP and proposed Amendment No. 61 and the advertising process that was undertaken , as well as clarify details of the draft ACP and proposed Amendment No. 61 requirements;
- Geoff Warn, Office of the Government Architect, to further clarify design quality, Design Review Panels and the concept of design excellence. Geoff presented information regarding podiums, building setbacks and towers;
- Peter Ciemetis of Roberts Day, regarding specific design outcomes of the draft ACP. Specific emphasis was given to setbacks, plot ratio and tower footprints and the impact on streetscapes and views; and
- Chris Swiderski of Flyt regarding traffic modelling that had been done to date and how this impacted on the design scenarios proposed in the draft ACP.

There was also a presentation provided on the feedback/responses from the broader community by Anna Kelderman of Shape Urban.

After the first day, some misunderstanding of key built form requirements was apparent, and on Day 2 a separate question and answer session was provided with key City staff which focussed on specific podium setback requirements, height permissibility, land use, shadowing and other panellist questions.

Group discussions were held after each presentation to relate what had been presented to the draft ACP and gain a better understanding of what impact if any these had on individuals' approach to the process or concerns regarding the draft documents.

## 8.2.1 Observations from Day 1

Day 1 was designed as a preliminary fact finding and familiarisation day. Presentations provided background information that would enable an informed discussion over both days. Initial discussions from Day 1 were centered around eight key topics.

- Height of the tower
- Height for the podium
- Front setbacks for podium
- Front setbacks for tower
- Transport
- Plot Ratio Limits
- Design

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Key themes that arose from those discussions included:

- Increase public transport services and frequencies – buses, ferry, CAT buses.
- Current tower heights were considered 'ok' however a reduction was also supported.
- Current tower setbacks were supported but a flexibility was encouraged to improve design.
- Podium heights were generally supported at 2-3 stories.
- Podium setbacks to the street should be varied based on location (commercial closer / residential further back).
- Landscaping should be included in the street setback area.
- Side setbacks were generally supported.
- Current plot ratio was generally supported.

### 8.2.2 Observations from Day 2

Day 2 more thoroughly considered the key themes and topics from the first session, in this case based specifically on areas within the draft ACP and proposed modifications per the Remit.

Groups were invited to provide recommended changes to a specific area within the draft ACP. The resultant outcomes were interrogated by each of the other groups before the group as a whole agreed through polling techniques and further discussions on what outcomes were acceptable or required more attention.

The discussions were augmented by polling and the final outcome was a series of recommendations that provides guidance to Council and the WAPC to gain a better understanding of the community's concerns and aspirations.

## 8.2 Recommended Modifications

The recommended modifications from the Community Panel are one element to be considered in the final recommendations for improvements to the draft ACP and proposed Amendment No. 61.

### 8.3.1 Mill Point Character Area

Figure 31 illustrates the Community Panel recommended changes for the Mill Point Character Area. Changes requested were focussed on the Mill Point Road spine, with a reduction in height suggested at the northern most end, two lots in the south and a limit of Tier 2 heights at the southern end. The southern most end of the spine has been suggested as being more suited to the Mends Street Character Area.

Detailed comments are also provided regarding the proposed changes where they were presented to the Panel, as follows.

#### Additional Comments

This area encompasses the northern heritage area around the Old Mill and is accepted to have a spine along Mill Point Road of taller buildings with lower development along the South Perth Esplanade and Melville Parade.

Key principles in support of Figure 31 for the Mill Point Character Area are:

- Podium to remain as included in the draft documents with Council discretion to vary setbacks where it suits the existing character or adjacent setbacks.
- Land use for this area should include aged care and serviced apartments.
- No reduction in height along foreshore.

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A number of additional comments were made that reflected the Community Panel expectations more broadly as recommendations of the plan. These are:

- Improvements to public transport and provide more options to move in and out of the area.
- Increase the ferry service and destinations.
- Reconsider car parking numbers (increase recommended).
- Add freeway on ramp to ease up congestion - use any profit from Tier 2 payments back into the community.
- Improve lighting under bridge to better enable walking to the CBD and back at night.
- Introduction of more community things like food carts, activities, along the foreshore.

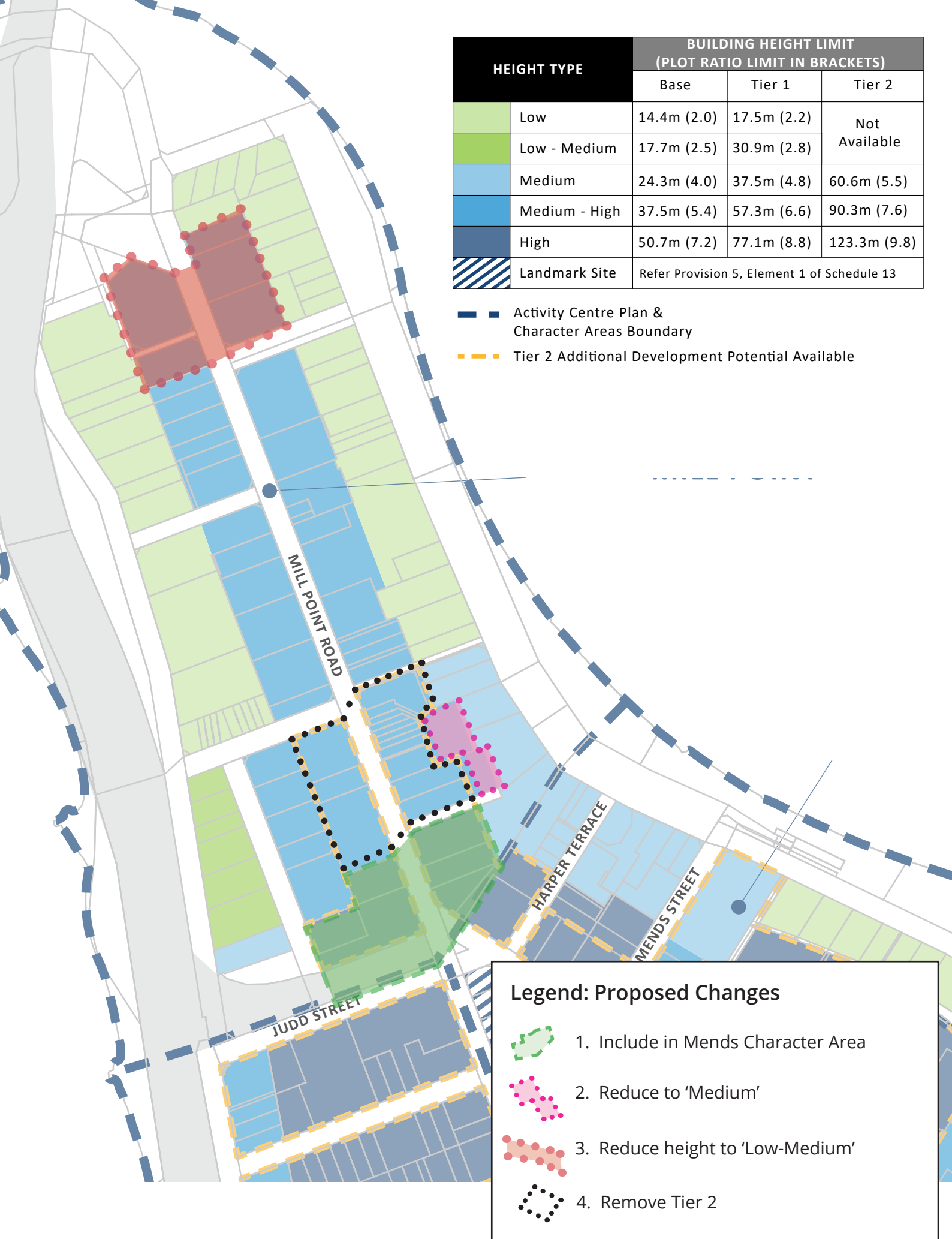


Figure 31 - Community Panel  
 Mill Point Character Area Proposed Amendments

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### 8.3.2 Mends Character Area

Figure 32 illustrates the Community Panel recommended changes for the Mends Character Area. As mentioned in 8.3.1, a small area of Mill Point Character Area is proposed to be included in the Mends Character Area. A small area of 'Medium' height type is proposed to have the Tier 2 heights removed, so ensure that the tiering of heights is consistent across the waterfront.

The group also suggested amending the boundary of the Mends Character Area along the southern end of South Perth Esplanade, where the height type is 'Low' and linking to Parker Street. A small area inside the new proposed boundary was suggested as increasing to the 'High' height type.

Additional comments are provided regarding the proposed changes where they were presented to the Panel, as follows:

- Land Uses: encourage more retail along Mends Street, near foreshore, no nightclubs.
- Preserve street fronts, footpaths - limit the use of podiums that impact on the street experience. There is a concern that the front setback of the podium will be a negative outcome for this area.
- Ensure there is adequate parking in buildings instead of allowing parking to spill out near the foreshore.



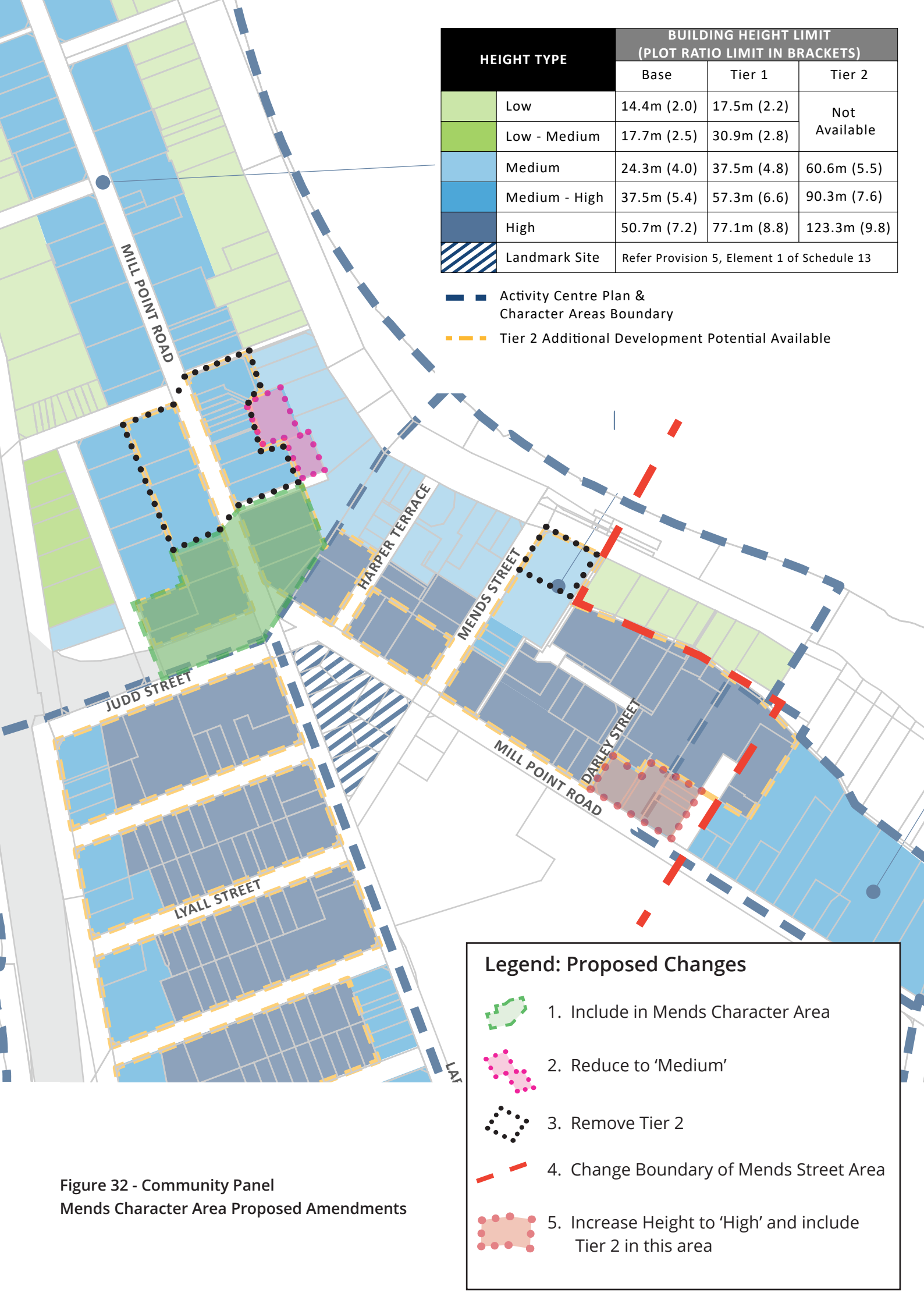


Figure 32 - Community Panel  
Mends Character Area Proposed Amendments



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### 8.3.3 Hillside Character Area

Figure 33 illustrates the Community Panel recommended changes for the Hillside Character Area.

The majority of participants did not have a concern with increasing height slightly in this area, noting that the current proposal would actually lower possible heights from current buildings which is unusual considering other draft documents limits. They suggested the controls would limit redevelopment in an area of ageing buildings.



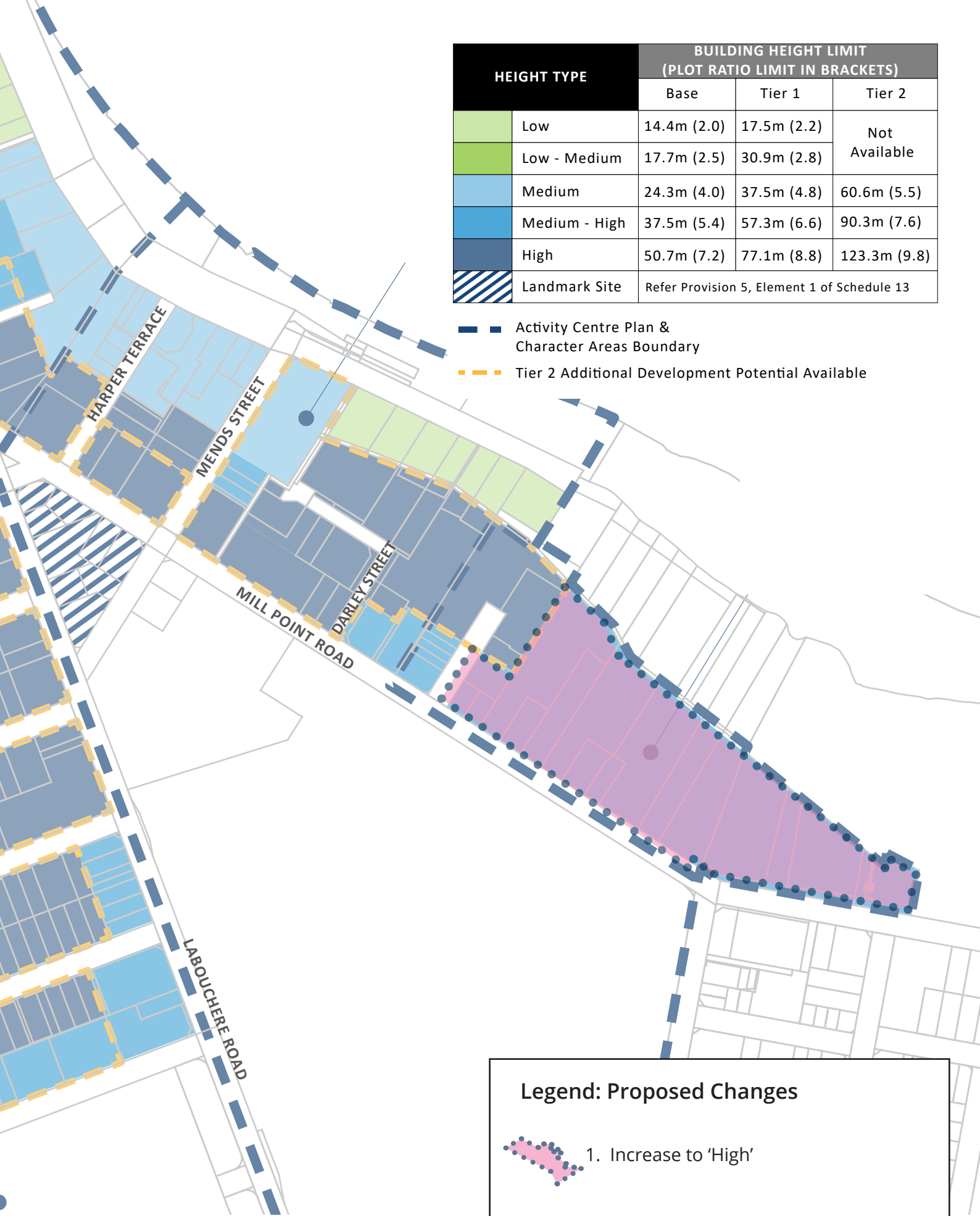


Figure 33 - Community Panel  
Hillside Character Area Proposed Amendments

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### 8.3.4 Richardson Character Area

Figure 34 illustrates the Community Panel recommended changes for the Hillside Character Area.

Panellists indicated support for the majority of the precinct, with the exception of some of the buildings along Labouchere Road, where the height of the buildings was a concern for overshadowing of the Perth Zoo.

Additional comments are provided regarding the proposed changes where they were presented to the Panel, as follows:

- Encourage development of a maximum of one nil side setback podium wall, and increase the other side – setback to compensate.
- Introduce protections that provide (ensure) access to winter sunlight for existing residents

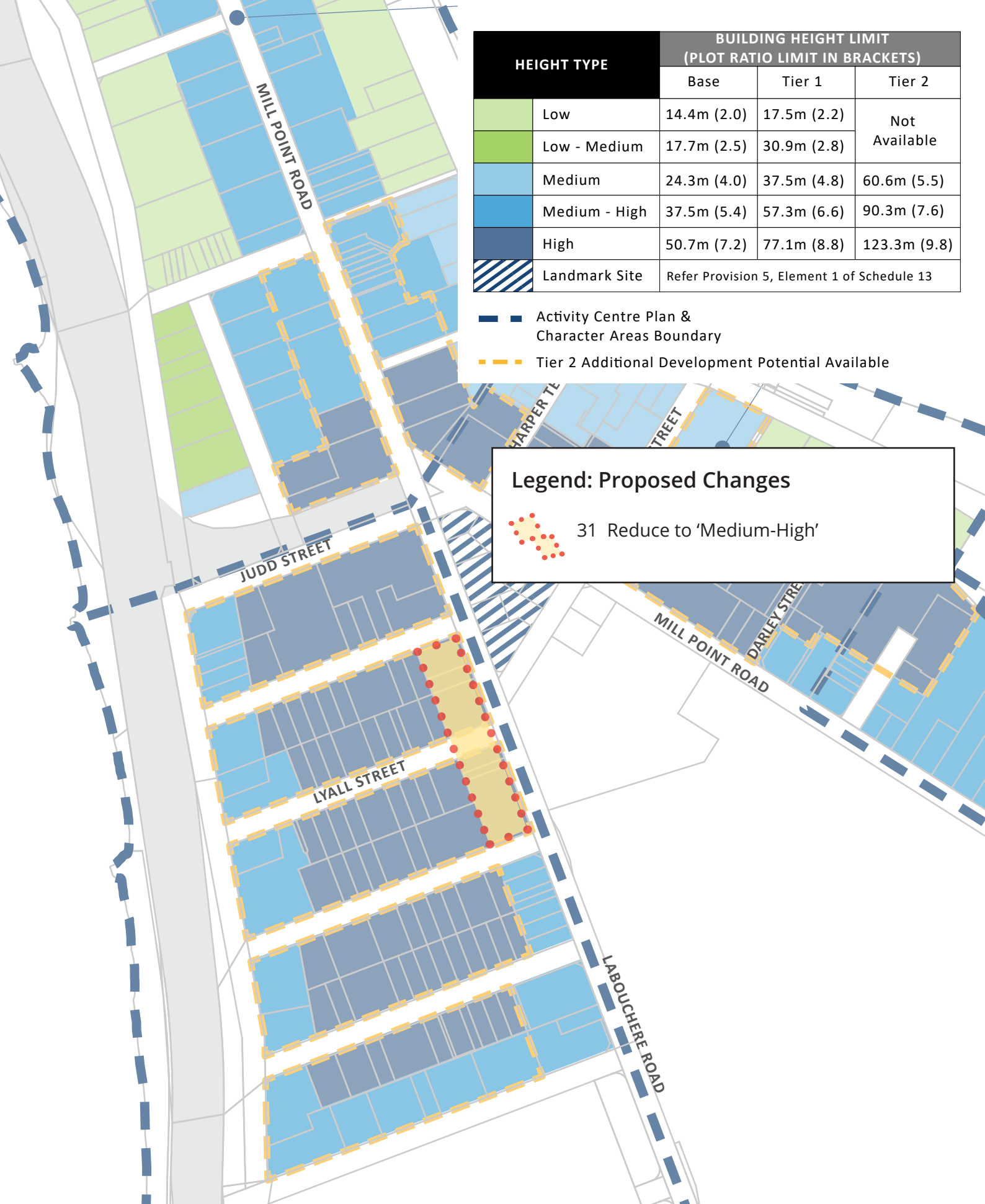


Figure 34 - Community Panel  
Richardson Character Area Proposed Amendments

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### 8.3 General Comments

A number of specific expectations were suggested by the Panel, which relate to the built form in the area. These included:

- Be clever with setbacks subject to design review:
  - Consider being flexible with side setbacks - encourage development which complements the adjacent property to improve outcomes.
  - Consider maximum length of wall before a break in the structure.
- Introduce protections that ensure access to winter sunlight for existing residents.
- Landscape, not pave, front setbacks. No parking should be allowed in these spaces.

A number of additional comments were made that reflected the Panel's expectations more broadly as recommendations which will encourage good outcomes as a result of the plan. These are:

- Improvements to public transport and provide more options.
- Reconsider car parking numbers (increase recommended), or introduce parking permits to favour local parking, with ranger patrols to police this.
- Add freeway on ramp to ease up congestion - use any profit from Tier 2 payments back into the community.
- Improve lighting under bridge to better enable walking to the CBD and back at night.
- Introduction of more community things like food carts, activities, along the foreshore
- Quality of design for all buildings, regardless of site, size and scale (design review for all).

- Land uses should be somewhat more flexible, with short stay accommodation, serviced apartments and aged care permitted in more locations, whilst most panellists suggested that they would not support nightclubs.

### 8.4 Community Benefits

When asked to consider the types of community benefit that would be supported to allow for additional development, the panellists polled their preferences with the dominant preferences as follows:

- More trees - 25 (plus 16 'other' tree suggestions).
- Community Space - 15.
- Train with parking at Richardson Area/ Advocate for train station/fund for contributions to train station construction - 11 (plus 48 'other' transport initiatives).
- Focus on public outcomes such as Sustainable benefits, sustainable transport, mid block links, access to ferry - 10.
- More shaded areas for families along the foreshore - 10.
- Free parking on weekends to attract visitors/ tourists and to make the area friendlier - 8.
- Children's play spaces - 6

### 8.5 Community Panel Summary

Recommended changes will be considered in conjunction with the same exercise undertaken by the SRG. Together, these suggestions will feed into the broader engagement to guide the final changes to the draft ACP and proposed Amendment No. 61.

# 9. Overall Summary

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The engagement process for the draft ACP and proposed Amendment No. 61 was extensive and multi-layered to ensure that as many members of the community could provide feedback to the City.

To ensure that the feedback was well considered and accurately framed, the engagement process also allowed for intensive workshoping sessions with a number of stakeholders, from both the existing SRG and a randomly selected demographically representative group of community members.

These two groups were perhaps the most reflective in terms of age and gender in the engagement process, noting that responses to the feedback forms and other direct email or mail inputs do represent a dominantly older, male demographic.

Across all engagement activities, a number of themes emerged which were consistent, and may form modifications to the draft documents. These are summarised in this section.

## 9.1 Height

Height has been a significant concern throughout the engagement period and is of concern to some members of both the SRG and Panel, although others are encouraging of it.

As the most consistent topic of feedback in the public engagement period, heights through the precinct did require more careful consideration.

Notwithstanding, most respondents agreed with the objectives of the height key element and, in particular, the tiering from the centre out to the river as an organising principle of the draft documents.

In addition, once detailed explanations of the height limits, podium setbacks and general setbacks were presented, the majority of the SRG and Panel indicated that the proposed heights were generally acceptable, subject to the design quality and built form limitations proposed by the draft documents.

Some modifications were suggested to enhance the tiering effect suggested in the draft ACP and to manage shadowing, including minor reductions along Mill Point Road and Labouchere Road and some increases in Hillside.

The project team will be investigating the suggested modifications to height in the ACP in further detail to ensure any changes would still achieve the objectives of the plan.

## 9.2 Podiums

Podiums attracted much attention in the broader engagement period. However, it is apparent that the podium element is not well understood and requires clearer presentation and clarification in the final documents. As noted in section 9.1, once detailed explanations of the podium setbacks and general setbacks were presented, the majority of the SRG and Panel indicated that the proposed podium requirements were generally acceptable, subject to the design quality requirements proposed by the plan.

Through the SRG and Panel, recommendations were made to ensure that podium requirements are considered flexibly, responding better to the adjacent development rather than stringent controls.

Suggested modifications included encouraging development of a maximum of one nil side setback podium wall, increasing the other side setback to compensate, or to match the adjacent property if nil setbacks already exist.

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Modifications suggested also included identifying a suitable maximum length of wall before there should be a break in the structure, for aesthetic purposes.

No changes were proposed with the exception of enabling flexibility. The project team will need to consider the suggested modifications in further detail to ensure any changes would not result in further interpretation issues.

### 9.3 Views/Value

Loss of views was a significant concern, with a dominant focus on properties between Harper Terrace and Ferry Street.

The recurring theme was that the loss of views and the influx of new apartments would result in reduced values in the area more generally.

In other submissions and in the SRG and the Panel, separation of towers, having thinner taller towers and increasing side setbacks as proposed in the draft ACP were supported to assist in creating view corridors and maintaining views.

Notwithstanding the concerns, as noted in section 9.1, few changes to heights were suggested through the SRG and Panel.

The project team will be investigating the concerns in further detail to ensure any modifications would still achieve the objectives of the plan.

### 9.4 Car parking requirements, car parking as plot ratio, and traffic

The provision of parking and impacts of having minimums and maximums was discussed by approximately 18% of submissions, and was also a key topic at the SRG and Panel.

On street parking as a result of inadequate parking in apartment buildings is also a concern, as was traffic resulting from increased population.

The inclusion of car parking in plot ratio was also identified as an issue by some, noting that this would force car parking underground at great cost.

Notwithstanding the comments, there was a recognition that new development closer to employment centres would encourage transition to public transport and walking/cycling. Many participants urged the City to advocate progressively for the development of the station, increased ferry services and stops, bus services, and much improved pedestrian and cyclist facilities.

The SRG and Panel provided some recommendations and some minor amendments to parking in the plan, including an increase in the short stay accommodation ratios.

It is noted that Main Roads WA advocates for lower parking ratios.

The project team will investigate the proposed modifications in light of both community expectation and State policy frameworks.

### 9.5 Plot Ratio

Plot ratio was typically discussed in reference to the overall intensity of development or, conversely, as a limiter to intensity. Intensity of development is discussed further under section 9.6.

A number of submissions contended that the plot ratio component was an unnecessary additional control that would have negative consequences on design.

Notwithstanding, the general deliberation of the SRG and Panel was that the plot ratio targets are appropriate and that the inclusion of car parking in plot ratio will encourage better design outcomes.



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Some suggested modifications included introducing a sliding scale of height and setbacks in the final documents, which may also include the plot ratio elements.

The project team will investigate all suggested modifications relating to height, setbacks and plot ratio to ensure that any changes would still achieve the objectives of the plan.

### 9.6 Too many dwellings and too large a population being targeted

The population estimates set for the draft ACP area have been the subject of detailed investigations over many years, in conjunction with the State.

Notwithstanding the broader concerns about the height and scale of development in the area, the ACP area has been identified for significant population growth. If future demand and growth are not well understood and reflected in the planning framework, there is a high risk that responses to actual demand and growth will not fit within the established vision.

The project team recognises that the proposed population will result in a significant change for the area. This is exacerbated by the fragmented nature of land ownership in the area, and the very limited development sites currently available, which means that development will be spread across disparate sites in the short term.

The draft ACP plans for the long term, which means substantial targets need to be applied in order to meet shorter term yield requirements.

### 9.7 Shadowing

Shadowing of nearby properties and of Perth Zoo was identified as a significant concern. Respondents expressed a concern for the current framework which only discusses the adjacent lot.

Suggestions for improvement include measuring overshadowing on all properties, not just adjacent properties, and ensuring that no shadowing occur over Perth Zoo.

The Panel recommended introducing protections that provide and ensure access to winter sunlight for existing residents. Both the SRG and Panel suggested lower height limits on properties that could potentially overshadow the Zoo (e.g. along Labouchere Road).

The project team will investigate all suggested modifications to ensure that any changes would still achieve the objectives of the plan.

### 9.8 Setbacks

Although limited comment was made on the proposed setbacks more generally (tower, side and rear), it is noted that some concerns have been raised regarding the stringent setback to height ratio. It was suggested that the 3-tiered requirements may result in a limited form, with buildings adhering to minimal alternatives.

A sliding scale was proposed instead, which would continue to limit development in overall height per the tiered system, but enable a variety of building size and form.

Submissions and the Panel also suggested that front setbacks should be landscaped, not paved, with no parking allowed in these spaces.

The project team will investigate all suggested modifications to ensure that any changes would still achieve the objectives of the plan.

### 9.9 Design Competitions

It is apparent that good design and quality buildings is paramount to the community. Design quality requirements were largely supported, although the need to go to a design competition was questioned by the development industry as an unnecessary cost.

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Some participants were very supportive of using the State Design Review Panel (although this has not been tested with the State).

The project team will consider the suggestions and concerns to ensure that the process continues to be fair and equitable.

### 9.10 Land Use

Many respondents suggested that land uses should be somewhat more flexible, with short stay accommodation, serviced apartments and aged care permitted in more locations. Conversely, in the Panel, most panellists suggested that they would not support nightclubs.

The project team will investigate all suggested land use modifications to ensure that any changes would still achieve the objectives of the plan and enhance the identified Character Areas.

### 9.11 Summary

The feedback received throughout the engagement and the recommended changes from the SRG and Panel described in this summary report will guide the final changes to the draft ACP, proposed Amendment No. 61 and proposed P321.

The project team will investigate recommended modifications to ensure that any suggestions do not result in changes to the objectives of the draft documents, or impact on the various interrelated design requirements.



# Appendix A

## Collated Direct Submissions

(Please see separate Volumes, 1, 2, 3 & 4)

Available upon request. Please contact City of South Perth.

# Appendix B

## Feedback Form 'Other' Comments

## Land Use

What changes would you suggest to the requirements for land use in Schedule 9B of proposed Amendment No. 61?

Drop the Activity concept. This is something dreamed up to penalise all residents on the South Perth Peninsula.

If you were being fair you would allow the same set backs, building heights and activities in every street in the city and not subject just one sector of the community to the Activity blunder.

Remove provision for entertainment facilities (Cinema, Tavern, Bar, Small Bar) across the board.

Household Type (Strategy 4.1.2)

While I generally support the Actions listed under this Strategy, I am concerned with the apparent correlation that increasing numbers of households described as 'Couples without dependents' and 'Lone person households' equates to a greater need for two bedroom and in particular one bedroom dwellings. In many areas of South Perth this is not the case and we believe the data needs to identify far more specifically, areas where this may and may not be considered appropriate development.

The Activity Centre provides for small shops but seriously lacks the provision of a large neighbourhood supermarket style shopping centre. This should have been part of the Civic Heart land or possibly longer term constructed over the Kwinana Freeway & Richardson Street Railway Station. The sale of sufficient air rights area over the freeway to a major private enterprise developer would also fund the Railway Station. This type of construction has occurred in many other locations around the world & a smaller example exists locally over the Subiaco Railway Station. A lack of shopping facilities will create increased traffic flow by South Perth residents who will need to drive to Victoria Park, Karawara or Subiaco for their shopping & other commercial needs.

The prescribed parking ratio built within the proposed amendments is restrictive and inflexible and is potentially a major hurdle to overcome in any viable development.

If there was more flexibility or underground or partly underground car parking to be treated more favorably and encouraged by council would be a good outcome for all

Instead of facing a prohibition on serviced apartments, the site of The Peninsula Serviced Apartments should be part of the Mends character area where serviced apartments can be allowed. Reasons: this site already supports tourism & employment, faces Mends St beach node, and is near the Mends St retail area & ferry.

At least some parts of The Peninsula Serviced Apartments site should have the fair opportunity, as other properties have, to attain a certain 'height type & limit' of 'high & tier2' if public benefits can be achieved. Reasons: the site's size, accessibility, and location near public transport can help with potential benefits of better design & view corridors, new pocket parks & open space links, and a better urban environment with lesser reliance on cars.

Particularly with regard to Movement and Access in ACP No:61 and South Perth Policy P321, it appears to me that the current problems with already difficult traffic movements for existing residents living on the actual Mill Point Peninsula have not been properly understood. The existing road network has difficulty now coping with vehicles exiting the Freeway and the Mend Street commercial precinct, complicated with hold ups particularly occurring at the Millpoint Rd/ Labouchere Rd intersection. Adding more vehicles associated with increased density options will make living on the Peninsula impossible. To expect elderly or even busy younger people to walk any longer distances that they currently do, is a myth.

There are too many D and DC categories which defeats the ACP objectives for land use that categorizes a particular area

Any land use which could impact the amenity of current/future residents in the area should be in consultation with residents eg. hotel, clubs, pubs, multiply dwellings, mixed use

In all character areas uses single house; ancillary accommodation and grouped dwelling: change X to P (prohibited to permitted). Will it be a better outcome for children should be the deciding factor.

## Land Use

What changes would you suggest to the requirements for land use in Schedule 9B of proposed Amendment No. 61?

As overarching goals, I don't have any significant issues with Land Use Objectives. I do have a problem with the fact that Maps showing the four Character Areas DO NOT correlate with the maps showing Density. You can't have it both ways - describe Character Areas and articulate specific Land Use Criteria and overlay this with arbitrary density maps that differ.

1.i. State quite clearly what the 'desired characteristics' are and who makes such decisions. Developers? Residents? Who has input into these 'desired characteristics'

ii. Do not support because I question whether the City can 'Ensure' such population growth accompanied by employment growth. Such growth is dependent on factors outside the control of the City.

iii. Support - where is the large supermarket for South Perth ie Coles or Woolworths?

iv. Explain in plain English. It sounds like a plan to overdevelop some areas.

Explain is meant by 'places of distinction and community value'. Cannot support this objective until such terms are explained.

v. Cannot support because of the vague, undefined terms used. What is meant by 'uses'

2. Unravelling Schedule B or proposed amendment No 61 is almost impossible. However, both documents appear to allow for the total overdevelopment of the Peninsula area and areas opposite the Zoo.

This document, along with all the others, should be written so that it can be understood.

Looking at the use Permissibility List, I notice that anything to do with the Aged Dwellings, Age Care, High Level Residential Aged Care Facility and Child Care is Discretionary, and Family Day Care and Carwash's are an X, except in Hillside and Millpoint all of the uses are growth industries and demand across all Character areas is D or DC, the same with Family Day Care. I know I own land in Hardy st which I believe the character area with the greatest growth potential, they should all be available as an approved use, and let the market dictate.

If someone on Hillside wants to erect a single house on the land they buy that should be allowed. Bed n breakfast and tourist accommodation (and I note Air BNB is specifically not mentioned) should not be allowed without Strata Company consent.

Motor Vehicle Wash should be an X use across the whole activity centre and particularly in the Mends precinct. Uses that generate high volumes of traffic and through-traffic movements that detract from urban and pedestrian amenity (such as a motor vehicle wash) should be discouraged. This use is more appropriately located on Canning Highway.

Public Parking Station should be an X use across the whole activity centre and only be permitted subject to compliance with criteria that includes the use being a part of a mixed use development and that the built form and land use activate the street level and contribute to the public realm and pedestrian amenity.

Ensure there is no increased high density parking or establishment of takeaway outlets or other proposed uses that would adversely impact current residential properties, residents in the Richardson Area - i.e. needs adequate/ greater protections for resident lifestyles in this sector. Richardson appears to be the most vulnerable to impacts of "mixed use" development focused on transport hub (new South Perth train station - site not marked on maps?).

Above ground parking should not be defined as plot ratio anywhere in the precinct. This will force - The mandate for non-residential plot ratio (min 1.0) within the Mends and Richardson character areas is only noted in the ACP and not the Amendment. It is confusing. - Serviced Apartments should be permitted for Hillside and Mill Point area. If tourist accommodation is DC for the 2 character area, it doesn't make sense to exclude Serviced Apartments.

Generally support but not to building height caps should be enforced

Serviced Apartments should be allowed across all precincts.

## Land Use

What changes would you suggest to the requirements for land use in Schedule 9B of proposed Amendment No. 61?

Extension of the ACP area boundary is generally supported so that the precinct can be assessed holistically. The new Hillside Precinct has a positive implication for developers and stakeholders without much negative impact on existing development.

The mandate for non-residential plot ratio (min 1.0) within the Mends and Richardson character areas is only noted in the ACP and not the Amendment. It is confusing for applicants to use 2 documents for statutory requirements.

Provision 3 of AMD 46 requires above ground car parking and vehicular manoeuvring space to be measured as plot ratio. Provision 3.1.4 of the ACP then discounts car parking plot ratio for non-residential uses. Again this is confusing and not considered reasonable.

Provision of additional Public Open space for local and district neighbourhood has been ignored despite the proposal to greatly increase the resident and workforce populations. This is totally unacceptable and will fail to retain the character of this part of the City

The trees lining the streets are at risk with podiums and development to the street boundaries. Inadequate requirements to provide public open space as part of any "tall" building and podium development.

Failure to address "avenue" aspects of existing major roads by keeping developments further from street boundaries.

The whole process appears to be without information from Main Roads about their plans to develop the roadways.

The process continues to be based on a rail station but does NOT address the interim period - people will still rely on cars to access the area, hence impact on parking, traffic movement and sire access/egress must be part of any new development

Council is discriminating against retail in Mends St by preventing 2h free shopper parking (which they provide for shoppers elsewhere, eg Preston St and Angelo St).

More residential land use, hotel, serviced apartment.

Zoning definitions are very old. Some more thought into 'future proofing' the area would be good.

### Building Height and Size Question 1

What changes would you suggest to the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61) ?

17.5 metres as proposed in Amendment No. 61 only facilitates an extra one level of height along the South Perth Esplanade. It should revert to the originally proposed 24.3 metres to allow enough extra height(three extra levels as opposed to only one extra level) incentive to rejuvenate the older buildings on the street.

I strongly do not support the reintroduction of height limits in areas of the ACP. Tier 3  
The medium-high section of Mill Point Rd should be changed to High.  
The medium-high sections to the west of the Richardson precinct should be changed to High.

There should not necessarily be a height restriction at all.

Reduced allowed building heights and set maximum building heights. Increase setbacks for podiums.

Create many more landmark sites where no height limits apply in the absolute core, the area bound by Labouchere Road and Mill Point intersection. Allowances for much greater height here and to the north of the peninsula should be permitted. Landmark sites should allow developers to justify extreme height on the project merit. There is only one landmark site at present, and that will be developed by Finar to relatively modest height, so designating that as the landmark site serves little purpose. There is opportunity for many more sites in this area to allow natural intensification will little impact on other areas.

Hi ... I am a South Perth resident ... I understand the need to increase density and personally don't care if buildings go to 50 stories high in South Perth, when they are in appropriate locations ... But our main foreshore area should not be building dominated (for those residents and visitors to South Perth using the foreshore and for those who have paid for a view of the foreshore/river/CITY, especially in recently purchased apartments ... It makes some sense for higher density for one block either side of Mends St, but on the Esplanade from Harper Tce Northwest, it should remain LOW.

Allow the buildings presently in place to continue to obtain visual benefits of the river and city views and not be built out by building heights and plot ratios that reduce the original feel of the South Perth city area.

scaling back of building heights along the Esplanade from 24.3m to 17.5m from the Narrows Bridge up to Mend Street.

I would suggest to increase of plot ratio in the schedule 9B of proposed Amendment No. 61, because the proposed plot ratio restricts the amount of living space, then limits the growth of population living in South Perth Activity centre area by 2041.

No greater than 18 floors

I would leave as the maximum height previously agreed and do not increase the height for the foreshore.

Keep building heights to no higher than the Reva apartments

the height limit should revert to the original 17.5 uniform with all land fronting the esplanade. This is especially required where the council have approved the higher levels from Fraser Lane to Mends Street.

Leave "Mends" at "LOW" and not allow it to be built to "medium"

As I have noted to [name removed], I and the other Owners at Bellray Apartments in Ray Street support the proposed building heights (14.4 and 17.5 metres - Tier 1) for the Esplanade, but we are concerned that the ground slope at the rear of the three properties to the east end of the Esplanade leave open the opportunity to abuse the height limits at the rear of these properties. This may affect our neighbours at Darley Heights and Goldman Apartments. We believe the scheme should provide for a setback or alternate provision to ensure the heights at the rear of these properties do not exceed the intended building height limits of 14.4 and 17.4 metres.

See comment on tier system.

### Building Height and Size Question 1

What changes would you suggest to the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61) ?

Do not support proposed high-rise sky-scraper forests concentrated in the peninsula area. To support the "questionable" population predictions, these should be spread more evenly across the city of South Perth.

I would not allow a Medium-High height type[a possible 90mtrs] to be built behind a Low height type [a maximum 17mtrs] as has been proposed for the area on the Esplanade north of Frasers Lane. I suggest that the Low Height types be changed to at least a Low-Medium height type or higher if there are to be Medium -High height types built right behind them....

There are too many building planning controls which will restrict design & create a series of boring stereotype buildings. Building height should relate to numbers of storeys rather than a measured height to encourage higher ceiling heights to living/office spaces.

I am an owner at Bellray, I support proposed heights at the Esplanade (Tier1) but harbour concerns that the slope of the land at the rear of building that front the Esplanade could be used as ground level as opposed to the 'natural' level which is clearly the level that across most of the land. Further, setbacks should not be abused which enables building higher than the Tier 1 limits.

I support the proposed building heights on the Esplanade, however, some of the properties on the Esplanade towards the park have land that extends up a slope and over their sewer line . This will affect our neighbours at Darley Heights and Goldman apartments.  
I think that within the Town planning scheme the said owners should not be able to use that land for building and to ensure that the building height does not exceed the suggested height limits of 14.4m and 17.4m

I see an opportunity for developers to build skinny oblong views to maximise the windows facing this views. To the properties behind, this will form a "wall" and will go against the tower philosophy. I would like to see the towers maintain a ratio width and length, this will help to maintain the tower design.

25 story should be max height.  
size of apartments no less than 80 sqm for one bed. Infill requirement can accommodate this.  
Plot ratio requirement should include ground level amenities for any building above 10 floors. Eg cafe restaurant or any commercial space.

I would like to confirm that the height measured from natural ground level not 213 AHD and remove the car parking from plot ratio calculation

For all further developments to revert back to the 17.5m limit.

Building heights are far too high - South Perth is not the CBD

I Support the Heights shown in the Activity Centre Height Map Schedule 9B Map 2 as it reflects a very fair distribution of Height throughout the Activity Centre  
However I do not support the proposed Plot Ratio calculation which now define residential car bays in the Plot Ratio calculation, unless they are wholly underground which then excludes from the calculation . I also suggest car bays partially below ground should also be excluded.

The stated Objectives are vague statements open to many interpretations and therefore allow no definitive height restrictions.Can argue for 10, 20, 40 + stories on basis of these objectives-all will fit depending on interpretation. Surely a defined height limit, plot ratio, defined garden setback and reduced podium size would be better objectives, rather than "excellent design","public benefit" etc. This particularly applies to residential areas e.g Mill Point Rd

Please refer to my email sent at 1:53 pm

Consideration of setbacks to boundaries in relation to plot ratio and heights. Allowance for higher limits along main traffic routes and spacing of buildings could impact traffic, wind effects, pedestrian amenity, access to sunlight, effect on the zoo.

Consideration of future traffic flows that might occur and allowance to improve the infrastructure (eg. extra lanes, alternate routes, entrances to freeway etc) to accommodate increased demand

I do not support the proposed change to include above ground car bays included into the plot ratio calculation.



## Building Height and Size Question 1

What changes would you suggest to the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61) ?

Whilst acknowledging the need for increase in heights, I wish to promote one minor change which would have a dramatic Town Planning effect.

Good Planning practice in the areas of the Freeway, the Richardson Park, the Mends St waterfront area and the open Space of the Hillside Park has been used to graduate the building heights rather than be confronted with a wall of tall buildings.

This is not the case on the Peninsula.

Firstly, it is not good practice to overshadow the main feature of the Peninsular boulevard with tall buildings and the height limit should be LOW-MEDIUM and thereby restricted to approximately 10 storeys. This will integrate with the existing 8 storeys.

Importantly, the "BLANK WALL" effect at Fraser Lane should be restricted in height on both sides of Mill Point Road for a distance of approximately 100 metres, running south to a new class "MEDIUM AND TIER 1 ONLY", thereby restricting the height to 37.5m being approximately 12 storeys.

Both conditions would result in a sensitive integration of new heights with the existing.

I strongly support rezoning of properties from 87 South Perth Esplanade (Coco's Lane) to 101 South Perth Esplanade to height of Medium (24.3m) similar to properties East of Mends Street from Frasers Lane to Mends Street, South Perth Esplanade.

Objective (iii) in draft ACP: To facilitate and manage growth across the ACP area based on population growth forecasts and identified economic and transport capacity, reflecting the centre's role as an inner city activity centre.

The bases rely on obsolete models of economic and traffic capacity that have little to do with ongoing and future changes. The old competitive economic model is produce, use and throwaway (demolish). New economies include sharing and collaborative (e.g. Airbnb); circular (recycling); sacred (Charles Eisenstein); generosity (gift) - greed produces dopamine in the brain whereas generosity produces serotonin. From consumption to contribution, from transaction to trust, from scarcity to abundance.

Donut Economics (Kate Rawath): A healthy economy should be designed to thrive not grow. "Design" is the "transformation of existing conditions into preferred ones." It's about creating simplicity, convenience, legibility, freedom, closeness, efficiency, safety and sociability. The Global Financial Crisis in 2009 was caused by Wall Street bankers operating in an accountability vacuum. (This quote sums it up nicely: "placed in a dark room with a pile of money and no one watching, they took it all"!)

There are no State Government plans to build a Train Station. All reference to this should be removed from this Document.

Plot Ratios are too generous and do not allow for the achievement of many of the descriptors applied to the four character areas.

The definition of the SPAC as a high level inner city AC is not supported by State Government documents.

Defined building envelopes are too generous.

Podium coverage and height should be reduced unless significant amalgamation of land parcels allows for corridors of open space at ground level

The height for buildings along The Esplanade and Mill Point Road north of Scott Street is excessive and unacceptable in that area. To go from 8 storeys to 16 stories is unacceptable and Tier Two is even higher along Mill Point Road. This debate has been had before and at that time common sense prevailed and existing height levels were maintained. This draft report is devious in that it is not providing information in plain English or heights in 'storeys'. It has been couched in planner jargon and a cynic might wonder whether this is an attempt to hide the real effect of the proposed changes to height/plot ratio in the Amendment and, consequently, to the street scape and livability of the area.

The requirements for building height and plot ratio in Schedule 9B of the proposed Amendment should remain as they are with little or no 'wriggle' room for developers to 'play the system'.



### Building Height and Size Question 1

What changes would you suggest to the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61) ?

1. the plan is predicated on a "future" South Perth Train Station. Given that there are no plans by government to build a train station in South Perth (and the residents do not want the train station) the whole premise of the Plan is incorrect.
2. There should be no PUBLIC BENEFIT CONTRIBUTION. If developer proposals are against the regulations then they are against the regulations. Another case of "if you have enough money then you get what you want".
3. South Perth Council has not given information as to shadows.
4. This plan creates future ghettos, wind tunnels and a "tar and cement" suburb.

No building height increases.

Maintain the present building heights. No tier system.

With reservations regarding plot ratio as car bays are defined in the calculations ground water will be displaced

I do not support any height increases above the height of buildings currently existing in the Mill Point Area. I do support the proposed height increases for the Mend Street Area but would prefer this did not include buildings north of the Judd Street alignment and Ferry Street.

Am not sure how the parking issued will be adequately addressed - problems already exist with multi-dwellings where there is insufficient parking due to numbers of residents per dwelling with vehicles. Street scape becomes a carpark-scape (as excess vehicles use street bays) and create difficulty for entry and exit onto road. Will this be compounded by South Perth Station (commuter parking spilling into surrounding residential streets?)

In regard to Objective 1.v. high frequency bus services running along Mill Point Road and Labouchere Rd provide more efficient and convenient transport services than the ferry. Bus services deliver commuters direct to Murray St/Hays St malls and the EQ bus and train stations /Yagan Square bus station, which afford greater choice and convenience for on-journey connections. Whilst the ferry is a higher amenity journey, commuters generally need to walk longer distances at both ends of the journey on the ferry, being less desirable than the bus services. For that reason, large scale developments should also be focussed along Mill Point Rd and Labouchere Rd.

With regard to Objective 2.i. development outcomes should be controlled based on sound principles, rather than a generic building envelope, that focus on performance objectives such as:

- activation of the street level and public realm to increase pedestrian amenity, safety and interest;
- high quality building design;
- taller, slender buildings that increase apartment amenity through sufficient separation and privacy to neighbouring properties/apartments, allowing for view corridors from all apartments i.e. each apartment enjoying views to the distance and not just a view of another building/apartment
- consideration for limiting over-shadowing and wind tunnel impacts
- not creating solid "walls" of development that restrict cross ventilation (don't allow for penetration by prevailing breezes) and views between buildings (one of the best parts of living in Hillside is that you don't need air-conditioning in summer due to the cooling south-west breezes)
- there should be diversity in building heights and bulk - no more Peninsula type development that presents a uniform wall of buildings with no diversity or interest

I agree with fixing height requirements and increasing population and activities, it has to happen. I am concerned re the shadow lines and current heights and think they should be reduced by 25%.

Must be higher non-residential Plot Ratio. Despite plot ration, heights must be limited in many locations to prevent uncertainty from amalgamating blocks

### Building Height and Size Question 1

What changes would you suggest to the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61) ?

We don't believe that building height caps should be enforced. There are onerous setback and plot ratio requirements coupled with natural site constraints that will dictate building heights.

We believe it unreasonable for any site currently with the AMD 46 Special Design Area not to be included within the highest building height limit with Tier 2 potential.

The reversed mapping of taller buildings centralised in the Richardson precinct is not reasonable considering the current Special Design Area. Considering many of the larger sites in Richardson are on Melville Parade intersections subject to pending DAs, it is not reasonable to restrict these developments to 90.3m.

Generally supported however there is significant concern regarding the relaxed building height limits that block views from existing development sites that were acquired by developers under the previous scheme. While there has been some attempt to tier building heights down along the Esplanade, we don't believe this is significant enough to respect the existing situation.

There are inconsistencies with the mapping of building height and plot ratio limits across the precinct. Notably sites on the Esplanade are mapped with different height limits across single sites. We believe it unreasonable for any site currently with the AMD 46 Special Design Area not to be included within the highest building height limit with Tier 2 potential.

Notwithstanding this, we don't believe that building height caps should be enforced. There are onerous setback and plot ratio requirements coupled with natural site constraints that will dictate building heights.

The reversed mapping of taller buildings centralised in the Richardson precinct is not reasonable considering the current Special Design Area. Considering many of the larger sites in Richardson are on Melville Parade intersections subject to pending DAs, it is not reasonable to restrict these developments to 90.3m.

There should not be any limitation in building height in the Special Design Area.

This should be determined by the other measures proposed such as plot ratio, tower footprint size and setbacks.

No development needs to exceed 12 storeys to achieve densities by 2030

Podiums MUST not come to any side or rear boundary where it would dominate the neighbouring property unless with the specific property owner 's written agreement.

Averaging setback on street frontages shall not allow less than the minimum setback.

Active street frontage of commercial property shall be set back from the street boundary and NOT infringe on the footpath at all.

That the height be taken from the natural deemed ground level as provided by state planning policy 7.3 of the residential design codes Vol 2

That the height be taken from the natural deemed ground level as provided by state planning policy 7.3 of the residential design codes vol 1.

Height limits should be lifted along with plot ratio increases to assist development and provide for sensible higher density outcomes.

Plot ratio should be the governing factor for height. Plot ratio should not include car bays.

Building heights and plot ratio should be increased.

No height limits. There are far too many development controls. Plot ratio should not include car bays.

plot ratio should not include car bays.

No height limits. Too many development controls.

Plot ratio should not include car parking. Too many development controls.

## Building Height and Size Question 2

Do you think the proposed tier system for building height and plot ratio limits in Schedule 9B of proposed Amendment No. 61 are appropriate?

Concentrating growth around Mends St / South Perth station as per objectives.

I think the heights along the South Perth Esplanade should be higher and return to the originally proposed 24.3 metres to facilitate enough incentive to rejuvenate the older buildings in the street with low quality architecture and aesthetic. An extra three levels isn't too much and will provide the economic incentive to create new buildings and better architecture along the foreshore.

The height limit on Tier 3 should be removed. Height limits are arbitrary and reactionary to the vocal minority. Building envelope requirements are plot ration limits form natural controls for the scale of development. I strongly argue that Tier 3 should have no height limit.

The height allowed is too high (CBD heights) and podium setbacks need to be increased. Number of units allowed in the areas should be reduced and allowable population densities decreased. Traffic and congestion need to be considered and not ignored.

As per previous response, the height limits are far too conservative. The sites that may allow 50 floor buildings of 150m+ are far too restricted. The city should be thinking in terms of a city that doesn't have the perth cbd next door, but a city in it's own right, the city in 100 years will require much taller buildings in this area. The framework should allow for this now, not refined again in decades to come. The scale tiers down far too quickly from the Landmark site "civic heart" and the peninsula lower height and plot ratio areas. Introduce more height limit free sites and push the heights taller on the Peninsula. The plan is simply far too restrictive and conservative when it comes to height. The peninsula is the perfect place for increased height due to the lesser effect of shadows on neighbouring properties but with the best views available. The market naturally wants to build there, to capitalise on the views and proximity to services in Perth and South Perth.

Hi ... I am a South Perth resident ... I understand the need to increase density and personally don't care if buildings go to 50 stories high in South Perth, when they are in appropriate locations ... But our main foreshore area should not be building dominated (for those residents and visitors to South Perth using the foreshore and for those who have paid for a view of the foreshore/river/CITY, especially in recently purchased apartments ... It makes some sense for higher density for one block either side of Mends St, but on the Esplanade from Harper Tce Northwest, it should remain LOW.

I have a northern facing property in Pinnacle, South Perth which was purchased on the understanding that views would not be blocked out by buildings of a higher level.

I have lived in south Perth for 25 years and it seems there is no control of these building heights and plot ratios to date, and it seems the developers can adjust these heights and plot ratios as they feel fit, simply by bypassing the South Perth council's decisions. So there is little faith that these rules will be followed, and will be a case by case basis on what the developer is trying to achieve.

I would suggest that the plot ratio to be increased, in order to bring more people to South Perth activity centre area. Under the current proposed Amendment No 61, the plot ratio allowed is too restrictive.

Scryscrapers are not appropriate to the South Perth area and will be detrimental to those who purchased at a premium in good faith.

The foreshore should not have increased heights of the buildings in the future due to foreshore look and feel and interaction with local community and visitors to the foreshore. It would spoil the look and feel, impact animal and bird life too.

It changes all the guarantees of views to the city which I had paid a premium for.

Many people have invested in property within the Esplanade region where they have paid a premium for views to the river and city. The proposal to increase the building height along the esplanade from Fraser Lane to Mends St will seriously devalue current investors and owners. A uniform approach along the whole of the Esplanade protects those who have invested in property already and is the only logical solution for building heights along the Esplanade area to Mends St.

Mends should be left at Low and now able to be built up

## Building Height and Size Question 2

Do you think the proposed tier system for building height and plot ratio limits in Schedule 9B of proposed Amendment No. 61 are appropriate?

I believe we need to maintain reasonable views to the greatest extent possible for residents which the tier system achieves in most cases. I also believe that when viewing South Perth from the City of Perth, Kings Park and Melville Waters sides the ultimate tier system, particularly in the future when a number of developments will have proceeded, will give a more uniform and enhanced profile visual impact .

The principle of a tier system is appropriate but the additional heights available in Tier 1 and Tier 2 are disproportionate to the standard height.

Do not support proposed high-rise sky-scraper forests concentrated in the peninsula area. To support the "questionable" population predictions, these should be spread more evenly across the city of South Perth.

The proposed 1 story increase along the South Perth Esplanade north of Fraser Lane to six storeys [Low Height type 17mtrs tier 1] compared to the proposed increase in building heights directly behind in Mill Pt road[Medium-High height type 90mtrs Tier2] to a possible 29 storeys seems wildly out of proportion and will look ascetically disproportionate .There is two levels of building height limit separating them[Low-Medium]and[Medium]..Is there a reason for this?Surely a much higher building height level along the Esplanade[8-10storeys] will not only look more pleasing but it will incentivise developers to build the appropriate buildings so that the Draft ACP Objectives to Building Heights can be achieved ie to locate larger scale developments within walking distance to Mends St.. otherwise that strip of Blue Chip real estate will never reach its full potential and will remain dwarfed by the buildings behind it.The Tier system seems to greatly benefit some properties and and has little or no benefit for others.

There should be no tier system with each site considered on its merits to encourage design innovation & building use. Market demand, building cost in relation to profit & market cycles as to the strength of residential or office markets will drive building styles.

The building should be tiered from lower at the Esplanade to higher as you move away from the Esplanade. This will improve the view towards South Perth from the city and Kings' Park as well as prevent concrete jungles at the riverfront..

As the amendment 61 encourages slimmer towers with lower height limits on the outside area of the activity centre overlooking uninterrupted river and city views . This will allow many more residences to have more viewing corridors through the viewing corridors created between the slimmer towers.

So the views would be better shared by all heights

Improve outlook from building and improve natural light.

I think this will be a significant architectural feature of the area which will stand the test of time.

They are way to high ....it will lead to Southbank Melbourne like infrastructure which has no soul and no sunlight. You don't need 37 story building to plan for future growth.  
The traffic control will be non existent.

Slimmer towers and building tiering in height are ok as you will get more views for more residents

I am supportive of developing South Perth to cater to growing populations but HIGHLY oppose to increasing height limits for future developments as this CHANGES the reason we have chosen to live in South Perth and highly derimental to existing owners view of the skyline.

A system is important, however I do not agree with the allocated areas for the categories

A preference for a good degree of diversity in building heights and shapes.

Provide more flexibility in generating car parks To ensure parking on the surrounding street is minimised. Given the high water table, creating enough parking underground will prove to be very difficult and going down too deep will affect the water table and potentially adversely affect surrounding properties.

Have taken everything into account, great forward thinking

## Building Height and Size Question 2

Do you think the proposed tier system for building height and plot ratio limits in Schedule 9B of proposed Amendment No. 61 are appropriate?

More availability for more people

See above

It is grossly unfair for Planners/Council to hoodwink the public with such loaded categories of questions given the vague open platitudes and Objectives put forward.

In practice they can be twisted and interpreted to allow almost any Development.

Please refer to my email sent at 1:53 pm

Building heights/ratios along Labouchere and Mill Point could be reduced; avoiding podiums that are too high being set too close to these roads; reference to traffic impacts/traffic studies could be made; provision to improve/expand vehicle routes, entries and exits to area when the population expands

The slimmer towers and proposed building height will allow for more South perth residents to have a view.

You dont need building height discretion to determine good architecture.

The obvious contradiction in the document is the desire for certainly whilst at the same time promoting discretion in height , thereby creating uncertainty.

This has been the cause of nearly all the planning issues over the last 5 years.

Make a clear statement on building heights !!! Take out TIER 2.

1. Substantially close walking to distance to Ferry terminal, transport node which is advocated by the State Planning Department.

2. Originally, this recommended rezoning (24.3m) was advocated by South Perth Town Planning Offices to South Perth City Council.

Background information provided separately (RJ Ferguson Report 1983 and Bonton P/L decisions of the Town Planning Appeal Board and Supreme Court in 1981) shows sound reasoning for height limits at the time, and that checks and balances were employed such as only 50% of dwellings in streets could be converted to offices. It was not historical mistakes, but those arising from scheme amendment 25 (gazetted 18 Jan 2013), that cut into the amenity of neighbors. Parliamentary Counsel draft legislation and regulations but local planning schemes are drafted by relatively unskilled planners.

My proposed changes to the proposed tier system will be submitted separately by email.

Far too generous in many ways. Base height and permissable Tier 1 and 2 proposals are too high to achieve the descriptors of the Character Areas. The suggested tier system allows for CBD size buildings without any guarantee there will be activated ground levels eg. as per BHP Building in the City. Unless Developers are required to purchase large pieces of land and surround these with green space and ground/first floor public access there is the potential to have more buildings like Aurelia and Pinnacle.

Building height and land area coverage should allow for more appropriate corridors of open space at ground level.



## Building Height and Size Question 2

Do you think the proposed tier system for building height and plot ratio limits in Schedule 9B of proposed Amendment No. 61 are appropriate?

The Peninsula is a relatively fragile environment that need to be protected. There has been a significant water table problem that caused damage to properties in the building of Aurelia. To allow the proposed height/plot ratio to go ahead will destroy the unique nature of the Peninsula. High rise - as proposed- will turn tthe area into a very average/ordinary overdeveloped area. This is South Perth NOT Hong Kong or some other city with extremely dense development with which financiers/ developers/planners are familiar. South Perth should not be a clone of other cities. It has its own character and ambience that needs to be protected.

Some Council documents refer to the 'Village' or 'Community' aspect of South Perth. This plan has the potential to destrpy that forever.

Obj ii The Peninsula is a character area and Amendment 61 will destroy that character - one of tree lined streets with human scale buildings.

Obj iii How can Mends St/Peninsula area ever be an 'inner city activity centre' . What do you mean?

Obj v The South Perth train station is little more than a fiction. There is no mention of it being realised in any Transport documents or forwarding planning or forward expenditure estimates.

South Perth schould be celebrated for what it is and capitalise on being 'The Left Bank' area and quite different from the City atmosphere.

2.i Do not support the ploty ratio in Draft ACP It is to be hoped that the Council/Planners will always control the amount of development.

2.iii. Why leave it to 'building designers' aka architects to decide the best allocation of plot ratio area. The City should set the guidelines/rules and insist on them being followed.

Independent experts need to look at this.

Congestion.

Overcrowding within a residential area.

All heights are to be measured from Natural Ground Level

I support the proposed tier system but not any proposed height increases in the Mill Point Area.

CoSP needs to provide some assurance for adjacent property owners re impacts. South Perth skyline and ambience has already been spoilt to an extent by the very high rise developments on Mill Point Road/ Mends Street - shaded; visually disconnecting people from the river

The tiered system should encourage developers/designers to deliver higher quality and more innovative/creative outcomes.

Flexibility and incentives should be guided by clear performance objectives (refer to the answer to Q4 above).

Assessment of proposals and design excellence should be guided by a Design Review Panel and the State Design Panel for development seeking Tier 1 and Tier 2 heights and plot ratio.

Yes I agree with the tier system but not to the levels of height proposed.

There is no community benefit for allowing the developer to buy extra profit with NO benefits, especially since you dont even know how you would handle the slush fund.

Could you use the money to build the unnecessary station?

Generally supported however there is significant concern regarding the relaxed building height limits that block views from existing development sites that were acquired by developers under the previous scheme. While there has been some attempt to tier building heights down along the Esplanade, we don't believe this is significant enough to respect the existing situation.

There are inconsistencies with the mapping of building height and plot ratio limits across the precinct. Notably sites on the Esplanade are mapped with different height limits across single sites.

We believe that the yellow tier 2 line should stop behind Winsor Hotel excluding 83-85 The Esplanade from the Tier 2 zone.

## Building Height and Size Question 2

Do you think the proposed tier system for building height and plot ratio limits in Schedule 9B of proposed Amendment No. 61 are appropriate?

Generally supported however there is significant concern regarding the relaxed building height limits that block views from existing development sites that were acquired by developers under the previous scheme. While there has been some attempt to tier building heights down along the Esplanade, we don't believe this is significant enough to respect the existing situation.

There are inconsistencies with the mapping of building height and plot ratio limits across the precinct. Notably sites on the Esplanade are mapped with different height limits across single sites. We believe it unreasonable for any site currently with the AMD 46 Special Design Area not to be included within the highest building height limit with Tier 2 potential.

Notwithstanding this, we don't believe that building height caps should be enforced. There are onerous setback and plot ratio requirements coupled with natural site constraints that will dictate building heights.

The reversed mapping of taller buildings centralised in the Richardson precinct is not reasonable considering the current Special Design Area. Considering many of the larger sites in Richardson are on Melville Parade intersections subject to pending DAs, it is not reasonable to restrict these developments to 90.3m.

The height provisions in some cases (eg : between the zoo and Melville Parade) are the reverse of Amendment 46. This is patently unfair on developers who have purchased land that was valued under the previous scheme. It is acceptable to increase heights though to diminish them on corners is contrary to many planning philosophies and should not be done in this instance.

History has shown the numbers can be manipulated to suit developer.

It provides a balance to the area

Height should be deemed from ground level

It provides a balance to the area

Higher density by increasing heights etc will allow a more diverse population mix and improve the area. it will benefit local businesses and lift the region by improving the general feel and local ambience. its a positive move by increasing heights etc heading west along Mill Point Rd as this is highly residential in nature and supports a high density population position.

More height to encourage more density and diversity is a great outcome. It will help small businesses and greatly improve overall liveability.

South Perth residence and the general public will benefit from higher density which will encourage local business.

More height and more plot ratio opens up the area to more people and lifestyle options.

This part of the city is under developed. Need to increase density, activation and amenity.



## Podiums

What changes would you suggest to the requirements for podiums in Schedule 9B of proposed Amendment No. 61?

Scrap the idea. Podiums are not needed in South Perth. Just like Connect South they will be a disaster for the outlook and mobility in the area.

Setbacks for podiums should be increased. Also podiums should not be allowed in the Mill Point area. The use of podiums should be minimised where possible.

Podiums in Richardson should be limited to two stories.

Reduced heights of skyscraper forests, reduces the need for ugly podiums.

There are too many building planning controls. Guidelines for podiums make building impossible on small 597 square metre lots which are common to the Richardson Street Precinct. Setbacks should be made flexible up to zero at street front & side boundaries for all size sites to allow innovative street level design to attract vibrant uses & far better pedestrian interaction. The height of podiums should allow a flexible number of floors to allow street front uses & sufficient above ground carparking due to the high ground water table & 100 year flood area.

The variation in the setback is significant. I would like to see more uniformity across the area. Additionally, I would like to see requirements for gardens in the setback (or opportunity to reduce the setback if green areas are optimised).

Podium levels should start from 2nd level (except for the entrance) with a ramp leading to 2nd level leaving ground floor level for compulsory commercial activity such as restaurants, cafes and other form of public useful amenities. What's the point of having all those residents if they go to other areas to shop or eat.

The Objectives in this section contradict reality. The very existence of a podium that can cover 70 - 90% of the site (Provision 5 Element 3) makes it impossible to develop 'Human Scale' and 'Interesting' buildings that 'encourage pedestrian movement'. Most of the ACP is residential and there should be NO podiums in primarily residential buildings. Yes, if they are to be permitted, they need to be high quality materials etc, but generally speaking should not be considered.

Please refer to my earlier background feedback on podiums. In order to avoid apartments with a balcony close-up to a blank wall next door, no new adjacent development should have a podium at the same level. It should be noted that mixed use may be better as residential alongside commercial rather than on top of commercial. Examples are the completed Pinnacle tower of 20 storeys with Pinnacle Commercial at 7 storeys alongside and still under construction One Richardson tower of 13 storeys with Richardson Centre at 9 storeys alongside. "It avoids the typical podium/tower relationship. The project's overall size requires the Richardson Centre to include considerable parking, while factoring in the high water table in the locale. To combat this challenge, conventional parking and car-stacking has been sleeved behind the cafe, office space and vertical circulation zones. This also aids in maintaining a striking frontage to the project, where architectural confidence is at the forefront." Expected completion is mid 2020.

Is that type of combination still possible in the draft ACP and draft A61? If not, it should be.

Podium coverage and height should be reduced unless significant amalgamation of land parcels allows for corridors of open space at ground level

2. Podiums have the potential to be too high and too bulky.

Podiums should NOT dominate the streetscape. There should be a requirement for them to be set well back and to allow for significant tree planting along any street frontage - not 'token' greenery. The developments at Aurelia and opposite the Zoo do absolutely nothing for the streetscape and such buildings (out to the building line and no significant tree planting) - should never be allowed to happen again. Aurelia does not present a pleasing or welcoming aspect at one of the main entrances to South Perth.

Setbacks should be sufficient in all cases to ensure that the London Plane trees in the Mill Point Area are not damaged.

## Podiums

What changes would you suggest to the requirements for podiums in Schedule 9B of proposed Amendment No. 61?

The ACP Objectives are deceptive and vague and generalised. They could apply to any development in any Council. The questions are loaded for a positive response. Answering yes to above is meaningless, and simply gives Planners carte blanche to interpret whatever they choose. By dividing the ACP into such a large and technical document, the average person gets put off reading and understanding the technical issues. How can you expect an average resident to grasp the difference between Site area podium, site cover, podium height as opposed to building height, building envelope etc. For Mill Point Rd, allowing podiums up to 11.1 m in height, and cover of 70-90% of site will totally destroy the leafy, setbacks, generous front gardens, residential feel of the area. The buildings and podiums should all be as one with at least the current building setbacks maintained. Short of writing all of this, none of the ACP questions would allow me to express the above because most of the ACP questions are loaded to ask and get an answer the Planners want. Not fair! The survey is badly constructed, too technical, too detailed, and does not address the issues of Building heights, building setbacks, building shadows, traffic, parking, and all the other issues that the Council has received over the past few years with each new development proposal in the Mill Point and other residential areas.

The council should re examine the previous letters of protest rather than casting them aside and now starting with a new slate which ignores resident's wishes.

This detailed response also applies to all the other "ACP Objectives" in this survey.

The street-level interest/activation and the human scale is so much more important than the height of the building

The street front setback should reflect the type of uses encouraged on the ground level within each precinct i.e. retail, cafes, alfresco etc and the need to balance awnings for pedestrian weather protection/amenity with retaining/planting extensive street trees to retain South Perth's green and natural character.

Podium setbacks should allow for substantial deep planting zones at the ground level to contribute to the retention of South Perth's green and natural character and urban cooling/shading. The Richardson and Mill Point precincts (and to a lesser extent the Hillside precinct) are characterised by well established and mature trees within the road reserve and front, side and rear setbacks.

Careful consideration should be given to off-setting ground level substantial tree planting with green roofs and walls, with priority/incentives given to ground level deep planting zones.

If the South Perth Foreshore Action Group continue to successfully object to planting substantial trees on the river foreshore, private land will need to do some heavy lifting to ensure that South Perth does not become devoid of significant and substantial trees.

Further consideration needs to be given to the consistency or conflicts between the ACP and the new Design WA suite of policies to guide apartment design and the soon to be released precinct planning.

I would much prefer taller slender towers in a landscape setting, than short, stubby buildings that cover the entire site at ground level in the Mill Point, Richardson and Hillside precincts.

If a building cannot support sufficient parking without a podium, the height is limited to what it can support.

We want to suggest installing fence or bollard to protect pedestrian and businesses along Harper Terrace and Mill Point Road. It's because vehicles are driving in a high speed from the freeway and therefore it would be great to implement any plans to protect pedestrian movement.

## Podiums

What changes would you suggest to the requirements for podiums in Schedule 9B of proposed Amendment No. 61?

AMD 61 provisions allow for less flexibility in the design of podiums than the current framework permits. In most precincts podiums are required to have significant street setbacks, far greater than the existing framework allows; this will severely impact the development potential of sites.

8-9m Street setbacks for podiums in Mill Point and Hillside will make development unviable for many sites already constrained by site cover and plot ratio provisions. Such large setbacks are likely to impede passive surveillance of the streets and create dead spaces in the City. AMD 61 suggests some small scale commercial for Mill Point and Hillside where 'appropriate' however such onerous street setbacks make commercial tenancies mostly unviable.

Pushing the podium street setback behind the tower setback in Mill Point and Hillside character zones is considered prescriptive and unnecessary. Coupled with the inability to 'average' street setbacks will have a detrimental impact on the diversity of built form and streetscape.

Reducing podium heights to 2-3 storeys throughout the precinct is considered conservative. These lower podiums will appear out of scale with existing apartment and commercial buildings.

It should be noted that 4.3.1.2 of the ACP require a floor to ceiling height of 4.0m for the ground floor of developments with active and semi active street interfaces. This provision is particularly prescriptive and worded in a way that mandates only 4.0m floor to ceiling heights where buildings are to have an active street interface. This is also at odds with the maximum podium heights under Table 3 in AMD 61. A 4m floor to ceiling height on ground will also impede the potential for commercial tenancies to be configured into upper podium storeys with insufficient space for structure and services, inhibited by the maximum heights of 11.1m (3 storey) and 7.8m (2 storey).

The podium setbacks do not correspond with the new maximum site coverage provisions. For example, the maximum podium site coverage for a Melville Parade site (2000sqm) is around 60% after all podium setbacks are accounted for.

Reducing podiums via restrictive site coverage and setback provisions will further drive parking below ground. South Perth is not conducive to deeper basements with high water table and difficulty

Side setbacks in AMD 61 are problematic for smaller sites.

We believe that podium footprint should be determined by site coverage and podium setback should be given to areas that are most beneficial according to the local context of each site.

## Podiums

What changes would you suggest to the requirements for podiums in Schedule 9B of proposed Amendment No. 61?

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Reducing podiums via restrictive site coverage and setback provisions will further drive parking below ground. South Perth is not conducive to deeper basements with high water table and difficulty

No podiums should be allowed in prime residential area. South Perth Esplanade is the showcase of South Perth and must remain so. there should be setbacks at side and rear of 4 metres.

The properties on the south perth esplanade east of the Ray st lane are primary residential properties facing the river creating diversity to the area. in order to maintain the amenity of this unique area, there should be a side and rear boundary podium set back of 4 metres as provided in the other residential areas within the activity centre scheme to allow landscaping around the buildings to soften and enhance the visual effect adjacent to the river front. the current proposal will look like a concrete mass and distract from the magnificent river vista.

4m rear setbacks should be discretionary. large rear setbacks are simply a waste of valuable land area and do nothing for achieving overall objectives for the region. no need for 8-9m setbacks on Mill Point Road.

Have some movement/discretion around rear setbacks. Set backs along Mill Point Road are too large. I support the podium site cover %.

setbacks along mill point road are too large.

I support the podium site cover

4m rear setbacks should be discretionary. I think the podium site cover percentage is more than adequate.

9m setback on Mill Point Road is too much.

### Towers Question 1

What changes would you suggest to the requirements for tower setbacks in Schedule 9B of proposed Amendment No. 61?

All setbacks should be a minimum of 4M

Developers and landowners should be allowed to buy, sell and trade the air rights of their plots to adjacent plots. This has been used very effectively in New York City. The city should establish a framework for this trade, to establish what portion can be traded. This would allow for say, one plot with a limit of 100m to sell a portion of that to the adjacent property. Whether that would allow the full 100m, or only a percentage, should be established. This will encourage tall buildings to be next to lower buildings, creating a permeable skyline that protects the amenity and targets set out in the setbacks policy.

N/A

The South Perth peninsula does not need forests of skyscrapers

There are too many building controls which will create stereotype design. Tower setbacks should be flexible to allow individual design relative to the style, height & bulk of neighbouring development.

None

I do not support the general objective stated that tall towers WILL promote design excellence, innovation and sustainability. The recently demolished Brownlie Towers exemplified this. "Minimising" wind impacts and overshadowing is not a justification for tall towers, as they will still be tall and therefore there will be a resultant increase in wind tunnelling and overshadowing and a reduction in view corridors. Especially from existing buildings!

Tower setbacks should be increased unless amalgamation of land parcels allows for larger corridors of open space at ground level

Obj i. Do not support Towers at all as outlined in this draft plan - particularly in the Mill Point/Mends/Hillside/Labouchere Road areas. Height requirements need to be revisited.

Obj iii Do not support Towers at all. I have little confidence that this objective will be realised. Tower heights should be significantly reduced. The proposed heights are unacceptable as is the density that will ensue. Density of population should be spread more evenly through the whole city and not be so clearly concentrated around the South Perth Activity Centre proposal.

Happy with setback proposals so long as they do not impact on the London Plane Trees

Once again, I object to the Draft ACP objectives,(applied to all the Elements), because they are simply a statement of common sense fact that any Council would apply in these circumstances. Therefore to predicate your survey in seeking responses to such loaded and biased questions is deceptive. Of course anybody being asked such vague feel good questions would be supportive. For the council then to take these responses as supporting its policies is unfair, and avoiding the basis issues that gave rise to all the preceding protests. e.g over densification, decreasing building setbacks in Mill Point Road residential areas, imposing podiums where non previously existed in these areas, masking the setbacks by treating them separate from the building, allowing unlimited heights as long as building "is slender". The Council survey is too technical, too long, and too biased. The extensive technical terms, the separation of planning categories, are not conducive to Residents and ratepayers who are not town planners. There is no questions related to the specific issues concerning residents and your "survey" is a fait accompli"

### **Towers Question 1**

What changes would you suggest to the requirements for tower setbacks in Schedule 9B of proposed Amendment No. 61?

Minimum side and rear setbacks need to be identified for the Hillside, Mill Point and Richardson precincts and they need to be greater than 4m.

My apartment enjoys an approximate 8-10m setback to the closest side boundary, whilst a recent JDAP approval allowed for an adjoining development to reduce the side setback to the common boundary to 4-6m.

Whilst more challenging for small and narrow lots and dependent on the bulk of the tower element, I would suggest that a minimum separation of 10 - 15m between apartment towers achieves a sufficient separation to maintain a minimum level of amenity, solar access, cross ventilation and privacy for residents and works towards maintaining view corridors.

I have no objection to a dramatic increase in the resident and workforce populations in the ACP area, in fact I am incredibly supportive due to the benefits it will bring (support for local business, greater diversity of food and beverage, entertainment and recreation options, greater activity and vibrancy etc etc), but I would hate to lose one of South Perth's most attractive, sought-after, valued and loved characteristics, being the green, treed landscape setting.

If they werent on podiums they would be ok.

Tower setback should be set a minimum from the boundary. The location of tower should be determined by the best design outcome rather than simply a setback dimension.

The principal for taller and slender towers is supported and has been an ongoing concept central to our recent Development Applications within the precinct.

On review, it is apparent that tower footprints become very inefficient on sites smaller than 1800sqm when additional building heights are sought.

Development Applications seeking additional height on sites smaller than 1200sqm would almost be unviable considering the tower floor plates would be reduced to 360 sqm in Tier 2 areas. This is at odds with the mapping of taller building heights in the centre of the Richardson Precinct where existing sites are typically smaller.

The Tower footprint should be varied progressively between height tiers. Depending on the precinct, this might be 1% (say between 30% and 40%) per one or two levels. Obviously when the minimum amount is reached this will change beyond that.

The current proposal will encourage two heights and insufficient variation in between. The tower footprint should be increased from 40% to 50% and 30% to 40% to include balconies, which should not be allowed beyond this percentage.



## Towers Question 2

What changes would you suggest to the requirements for tower floorplate area in Schedule 9B of proposed Amendment No. 61?

The floor plate should be no larger than the tower itself

Towers that propose being more slender than what is required in the scheme, should be specifically awarded height bonus as a reward. This will actively encourage developers to build higher, more slender towers, which will assist to achieve the aims of the floorplate policy and also result in more visually pleasing towers over time.

N/A

The South Perth peninsula does not need forests of skyscrapers

Tower floorplate as set out in the ACP is not workable on sites smaller than 1800 square metres which is 3 amalgamated small 600 sqm lots common to the Richardson Street Precinct. In most streets in the Richardson Street Precinct due to existing development the majority of possible amalgamated sites would be 3 X 600 sqm lots forming 1800 sqm sites or 2 X 600 sqm lots forming 1200 sqm sites. The building planning controls are focused on larger sites making building design on smaller sites unworkable & impossible for single 600 sqm sites.

None

Need to be reduced to ensure the objectives of the Character Areas - as per my previous comments.

Tower height should be reduced unless significant amalgamation of land parcels allows for additional open space around towers

Tower floorplate areas should be reduced as a result of a whole 'rethink' of Towers.  
It would have been very helpful to have had all the data expressed in plain English rather than in planner jargon.

I do not want to see building heights increased above the existing heights that currently exist in the Mill Pont Area.  
I am happy with the height proposals as they relate to the Richardson, Mend Street and the Hillside Areas.

see above

The Hillside provisions should be the same as Mill Point.

The floorplate refers to the ground not a podium. Towers to the ground without podium.

The principal for taller and slender towers is supported and has been an ongoing concept central to our recent Development Applications within the precinct.

On review, it is apparent that tower footprints become very inefficient on sites smaller than 1800sqm when additional building heights are sought.

Development Applications seeking additional height on sites smaller than 1200sqm would almost be unviable considering the tower floor plates would be reduced to 360 sqm in Tier 2 areas. This is at odds with the mapping of taller building heights in the centre of the Richardson Precinct where existing sites are typically smaller.

The required 10% reduction in floorplate area between tiers is excessive. We propose that a floor plate reduction is applied incrementally as building height increases. A suggested methodology is 0.5-1% reduction per additional storey dependent upon height zone. Building heights will lack diversity if an incremental system is not implemented. For example, increment may be 1% reduction per floor.

Element 5.2 will discourage applicants to provide larger balconies. This provision also discourages the use of inset balconies that are enclosed on three sides. We believe inset balconies are ideally suited to tower developments because they offer improved wind protection.



**Towers Question 2**

What changes would you suggest to the requirements for tower floorplate area in Schedule 9B of proposed Amendment No. 61?

The required 10% reduction in floorplate area between tiers is excessive. We propose that a floor plate reduction is applied incrementally as building height increases. A suggested methodology is 0.5-1% reduction per additional storey dependent upon height zone. Building heights will lack diversity if an incremental system is not implemented.

Element 5.2 will discourage applicants to provide larger balconies. This provision also discourages the use of inset balconies that are enclosed on three sides. We believe inset balconies are ideally suited to tower developments because they offer improved wind protection.

Greater flexibility as outlined above.

## Design Quality

What changes would you suggest to the requirements for design quality in Schedule 9B of proposed Amendment No. 61?

Apply the competitive design policy to all new builds, not just those above a certain height, to ensure best quality streetscape design in the area.

The height limitations need to be capped at 8 floors on Mill Point Road between Labouchere and Fraser Lane and 4 stories elsewhere with all having a minimum 4m setback

Less density, more consideration of environment, traffic, congestion, current needs of residents and less consideration of predicted population projections 20-30 years in the future.

Do not need forest of high-rise skyscrapers in the Peninsula area and / or design exemptions ref height limits

There are too many planning guidelines in the ACP. Amendment 61 will be in place for 20 + years & should allow flexibility for the ever changing cycle of architectural, lifestyle & technological change. Consumer use of shops & cafés could also change. Design Competition is unnecessary adding a huge cost & a deterrent to investment in the area. Developers will only construct viable buildings that attract market acceptability through good design. The concept of good design is subjective & what is highly regarded by one party may be looked upon differently by others. A single Design Review Panel should make the final determination. The greater the number of decision makers there are will result in less decisions being made. There are sufficient architectural design codes, building by laws, & State Government Planning guidelines in place to control Activity Centres let alone having further restrictions to burden the South Perth Activity Centre Plan. The ACP precinct will be a high rise locality & should expected a reasonably high level of shadowing & limitation to view paths. Each building will have at least one side in shadow for half of each day.

Support for sustainable design, contribution to streetscape and pedestrian amenity, especially when built closer to boundary setbacks eg. through shading, landscaping, other passive means of controlling the environment, vertical gardens, skygardens etc rather than hard landscaping. Would be good to require the developments that have lower setback requirements and greater height limits to contribute more to improve the environment

All buildings should be of exemplary design as per the Objectives in the ACP. It is very concerning to see images on this information sheet primarily of CBD locations and buildings. This conflicts with much of the stated Character Area criteria. I am not sure a Competitive Design Policy is needed if all buildings needed to be exemplary in the first place? Is this adding more cost and bureaucracy? All buildings should be built to a Base Height only and be of exemplary design in this prestigious and desirable ACP location.

It is impossible to ensure (make certain that something will occur or be the case) anything because it is not within the control of the architect who works to a brief and budget. Further, novation may occur which has been addressed in my earlier background information.

The word "demonstrate" should be read in the context of the Nairn judgments in contrast to theoretical. How does one demonstrate that a development demonstrably exceeds minimum design standards? There is the risk of litigation.

Support design proposals so long as they are not used to increase the height or bulk of new buildings above the height of existing buildings in the Mill Point Area.

I support the design proposals as they relate to the other three areas (ie Richardson, Mend Street and Hillside).

Ideally, I would like to see more emphasis in developments of 10 or more units/apartments to be required to meet environmentally sustainable standards for not only noise, but for thermal ingress and egress, rainwater collection and renewable energy sources (PV panels and battery storage).

## Design Quality

What changes would you suggest to the requirements for design quality in Schedule 9B of proposed Amendment No. 61?

Obj ii Who decides what the 'desired future character' of Mill Point is? Developers? When will residents be consulted and not just told what the 'desired future character' of their residential area will be? Should be a requirement for significant, intentional consultation with residents when this is being discussed/decided.

Obj iii Who decides what 'excellent and exemplary standards of design' are? Civic Heart is a case in question. There appears to be little that is exemplary or excellent in that design.

Obj v Where are the 'shadowing' models included in this plan? What is meant by 'excessive shadows'? There should be requirements that are enforced related to the degree of overshadowing that is permissible - and models should clearly indicate what the effect will be on adjacent properties at various times of the year and the cumulative effect on properties of several developments.

Design quality should include greening/plantings. It should not include towers and be in line/sympathy with current height limits.

Quality must be achieved for ALL new development, why would council allow 'ordinary (high quality)' buildings to be built? All should be excellent. not just those requiring a higher tier. Green star must be part of quality, and it must be >5.

Shadow effects must be extended to the length of the shadow. The days of just affecting adjacent properties are long gone.

The criteria for, and definition of 'architectural design excellence' is ambiguous. There has been some reluctance from the City's Design Review Panel to assess applications using this terminology.

The design Review Panel should be the sole arbiter to determine design quality.

To mandate design competition for any Tier 2 proposals is likely to be onerous and costly for applicants. It is considered unreasonable for a select Design Review Panel to dictate building designs throughout an entire precinct. Such a system will likely deter proposals in Tier 2, increasing the amount of shorter, bulkier designs. It will likely cause controversy and tension in the local design profession.

It's only considered reasonable to conduct design competitions on large public sites. It is unfair to impose competitions to this extent for private enterprise as it will stifle development and higher density applications. This in turn will restrict the capacity for the City to develop and suppress the local economy which is contrary to State Government policy.

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The Design Review Committee should be the single arbiter of design quality. The City and the JDAP should accept this committee's recommendation without the need for peer review or any other measure. If there is dissatisfaction with the DRC, then the panel should be changed.

P321 is not supported as the practical implications could hamper developers. we would encourage more of a combination of smaller and larger developments to provide variety.

I do not support P321. It will create and promote only 1 product type. I'd like to see it appeal to big and small developers to create an interesting mix.

Concerned that P321 will not help bigger investors in their decision making.

### Additional Development Potential and Public Benefit

What other infrastructure and/or community facilities do you think should be funded using public benefit contributions?

Remove Connect South and restore the beautiful foreshore that has been torn down to damage the environment in the area by replacing grass with concrete

A train station is a must for South Perth to properly develop. The city should establish a fund for this, outside of the state government, to pay for it and go along with the project. Contributions from developers wanting to build taller can go into this fund with earnest. The city would also benefit from a tram system along the length of Mill Point Road and Labourchere Road. Or, in the short term, a free CAT bus system like in Fremantle and Perth CBD.

The planning seems to lack a bold vision about what CoSP can do to enhance existing attractions. For example, CoSP could offer to fund a roof for the South Perth Railway Station. A boost for the Zoo, create a tourist feature (Perth's largest public building solar panel roof, inspired by Berlin's Hauptbahnhof, but with a viewing platform on top), and generate income for CoSP. Another example, a wide bridge over Labouchere Road, accommodating a restaurant/tearooms for Zoo visitors; Zoo can change existing tearooms into animal accommodation; give a safer crossing for pedestrians from Richardson St carpark and Station; could also accommodate non-Zoo patrons after Zoo closing. Inspired by a well-known bridge in Florence.

Parking infrastructure

Affordable Housing  
CAT type bus service  
Fenced dog exercise areas

Do not actually support Public Benefit Contribution as it sounds rather like an option to 'buy' exceptions to the rules.

Consideration should be given to other uses and activities within proposed developments that provide public benefit, such as:

- publicly accessible rooftop (or above ground terraces) bars, cafes and restaurants that provide public enjoyment of river, city and sunset views (such as Sweetwater Rooftop Bar in East Fremantle, which mixes residential uses with commercial and food/beverage)
- publicly accessible rooftops (such as those in Singapore - The Duxton at Pinnacle)
- inclusion of co-working spaces and board/meeting rooms for hire (such as included within developments in Victoria Park)
- publicly accessible thoroughfares where developments extend between two streets or a street and parkland and/or connecting across multiple adjoining development to increase walkability

There should be no public benefit contributions. If the proposed plan doesn't conform to the regulations then it shouldn't be allowed.

Believe the building of a South Perth railway station between the Elizabeth Quay and Canning Bridge stations a waste of money. Its proposed location east of the Melville Water, West of the Zoo and north of the Golf Club and sports ovals doesn't make sense.  
Apart from that, the area is currently very well serviced by buses (30, 31, 32, 34, 35 & the Curtin bus) and ferries.

Upgrades to provide improved pedestrian corridors, crossings and safety should be at least partially funded by Tier 1 and 2 developments

Ongoing maintenance and costs of employing people to maintain (localised employment opportunities) to keep facilities and services for residents and visitors to a high standard; accessible public transport. Right balance between simple natural open spaces and areas of public facility

### Additional Development Potential and Public Benefit

What other infrastructure and/or community facilities do you think should be funded using public benefit contributions?

This is atrocious. A Developers benefit scheme - allowing the developmet of buildings with no inherent public benefit. A good plan would specify the benefits required in the building rather than allowing developers to buy profit and ignore the public. But you have been singularaly unsuccessful in this to date, but rather that try harder you think up this 'bribe' system. All the items above are what council should be paying for through our rates, why are you selling out the community under the guise of what is already the responsibilty of council to provide. Funds MUST NOT BE USED for a station.

A Train Station

The fund can be used to fund to construct the train station.

The fund can also be used to upgrade stormwater infrastructure.

bike pathways, public transport access nodes, e.g. train station

Train station. More undercover areas along the foreshore.

Improve ferry access and quantity to improve water transport.

Train station. Bike paths.

Train station, bike paths, ferry focus.

ferry focus, bike paths, train station

Train station

## Additional Development Potential and Public Benefit 2

What changes would you suggest to the requirements for approval of additional development in Schedule 9B of proposed Amendment No. 61?

The plan should include a compensation plan for residents who are having the activity centre forces upon them without any consideration for their wellbeing, their quality of life, the environment nor the value of their properties which have been decimated by these most unfair plans

Height should be encouraged. The city can benefit from the increased rates and landmark status that new supertall buildings will provide. There is already public benefit with these towers with increased residents bringing more life to the city. Those that can afford the apartments on the upper levels are likely much more wealthy than those buying lower down. So the city would attract more wealthy people which is great for the economy. Public benefit can be provided by good design outcomes, not just cash contributions or facilities within the projects. The city should actively encourage a super tall tower to include an observation deck, to draw in visitors or have them stay longer when visiting Perth Zoo or Mends Street Jetty. Particular bonus should be applied to hotel developments, to encourage more people to stay in the activity centre instead of Perth CBD. The requirements for approval of additional development are too strict.

Contradictory responses required by the questions asked in this section. I do NOT support Additional Development potential being linked to Public Benefit. ALL development should be linked to Public Benefit. Questions (iii), (iv) and (v) assume there WILL BE additional development and, so assuming this, there is no other option ... the objectives need to be supported. Additional questions regarding Public Benefit are required.

I'm not convinced that the method will work because it has not been demonstrated so is theoretical at this stage. The value capture method has been abandoned by the State Government as a means of funding Metronet stations. The WAPC has released Draft SPP 3.6 Infrastructure Contributions. (The link is <https://consultation.dplh.wa.gov.au/policy/draft-spp-3-6/> Public comment closes 2 Sep 2019). The explanation of how this policy is to be applied is so involved that it seems to be unworkable / impractical. Adopt affordable housing policy similar to that of MRA.

Obj i There are too many points at which the system can be manipulated or abused in any suggestion of Additional Development Potential. Limits should be set and enforced.  
Obj ii Do not support, in any way, approval of additional height and/or plot ratio. This is wide open to manipulation and abuse.  
Obj iii Delete all mention of Additional Development Potential.  
Obj v This should be a matter of due and proper process and should never be compromised. All matters should automatically be dealt with in this manner.  
2. What is meant by 'Placemaking initiatives'?  
3. Public Benefit Contribution sounds like 'buying' exceptions to the rules/limits etc.  
5. There are too many variables that have very loose definitions. eg What constitutes a 'significant adverse effect'? Who decides? -----in all probability no one who will actually be affected. Suggest that 'Significant and Meaningful consultation with those likely to be affected' be added.  
Who decides what constitutes 'exemplary design'. Decisions over Civic Heart design do not give confidence in decision making.  
Everything needs to be expressed in plain English and all requirements enforced. There should be no room for manipulation of the system.

I'm not familiar with the requirements and have not had time to review them, hence the neutral response to Q4.

## Additional Development Potential and Public Benefit 2

What changes would you suggest to the requirements for approval of additional development in Schedule 9B of proposed Amendment No. 61?

See above. There should be no public benefit contributions. If the plans are against the regulations then ratepayers/residents are going to suffer. A small room available for use by the public (or some such other "offering") is not going to make up for whatever it is that goes against the regulations. If it wasn't detrimental then it wouldn't have been excluded from the regulations. This leads to extras being "bought" by the highest bidder and to corruption by developers and the local council. Look at what happened with the so called "entry statement" building on Labouchere and Judd (where the Red Cabbage restaurant is). It was allowed more development in exchange for a "superior garden design". The garden has only ever consisted of ground cover and a few trees. Certainly nothing "superior" - and they got away with it. The developers must be laughing themselves silly over how stupid the council is.

Would not support additional development rights if it meant increasing the height of new developments above the height of buildings that currently exist in the Mill Point Area. Happy with proposals as they relate to the other three areas.

Increased developer contributions to fund upgrades to the specific area (ACP) where the development is approved i.e. as the impact is greatest in the immediate surround area, then it should not be used for other locations in the greater City of South Perth

Better articulation of need to allow for any "special circumstances" and developments outside the defined limits allowed under the plan - irrespective of some public benefits contribution, there will be property owners, residents etc adversely impacted by any "additional development". People want certainty in terms of their own investment. Local governments should be managing effectively without need for developer topup contributions. Not sure wording is correct at Obj 5 "legible".

Minimise the scope to provide more certainty. Make the developer provide public benefit WITH the building. Dont set up a bribery methodology to enable developers to build maximum profit buildings.

Happy with proposed system.

This contribution scheme is generally supported however we don't agree that contributions should be required for additional building height if the plot ratio is below the base limit. This will stifle innovative and creative applications for taller, thinner buildings.

We suggest that council conducts some financial modelling with applicants on several case studies to ensure the proposed scheme is commercially viable.

Considering the proposed tiering of development sites, there may be an opportunity to tier public benefits contributions. There will be a significant land value uplift dependent upon base height, Tier 1 or Tier 2 development proposals however the current formulae doesn't necessarily reflect this.

Has an option been explored that changes the value of plot ratio based on the proposed tiering methodology?

Developer contributions should be more flexible to allow greater diversity in design whilst still achieving public space enhancement. ie 'inkind' contributions,

Give developers the option to provide 'public benefits' that integrate with both said development and streetscape in lieu of developer contributions.



## Bicycle and Car Parking

Do you have any general comments about bicycle and car parking in the draft ACP?

The whole idea of the ACP is to reduce dependency on cars (i.e. proximity to public transportation and the CBD). I'm 100% behind the ACP if anything, based on this prospect, the location (proximity to city) and transport options available.

I am close to the SPACP The parking to the east side of the zoo has been converted to paid parking which has sent the cars that previously parked there into my street, just out of the area. Most of these cars are Zoo workers.

While the requirements and goals of the draft ACP are commendable, nothing is actually being proposed in terms of alternative means of transport. Not every able-bodied person can cycle to the ACP, yet I don't read anything being proposed. A shuttle bus perhaps? I also read in The West on 25 May, that South Perth council are proposing to charge for parking all along the foreshore. I have personally tried taking a bus to and from the zoo with my daughter to Salter Point. Taking it to the zoo was fine, going home, however, was not. We waited 45mins with no bus in sight and I finally had to call a relative to come and pick us up. Unless assurance can be made that public transport will be more reliable, all you're doing is dissuading people from going to the zoo or any of those places they will now have to pay for parking for. It is ridiculous to simply spout lofty aims with any concrete plans, even in this draft stage. As a mum of a young child, I often enjoyed the foreshore and parked at the Coode St car parks. However, if I have to pay for parking now, I will most likely not be going there any time soon. There should instead be a time limit for people who just want to enjoy the foreshore and surrounding business for 2 to 4 hours. Charging the commuters going into the city is fine and the all-day fee will do this. However, punishing residents and other users of the parks is unacceptable.

Forcing the Activity Centre on the residents is fundamentally wrong and should be forced on every street in the City of South Perth if you are going to be fair to everyone.

Residents should be free to decide if they want to have a car or not and the plan should include a road infrastructure in the event people exercise their right to own and operate a car.

The city should allow residents to choose their preferred mode of transport and support that choice. The City should support the choices made by their residents not support what the city believes is best for the residents. There has been too much effort put into providing for bicycles and much less support put into providing for pedestrians and vehicles. Not everyone can or is able to use a bike as a means of transport.

N/A

Major problem is the significant increase in proposed population density in the South Perth peninsula area. If we got rid of the proposed forests of high-rise skyscrapers, we would not have the same impact on the already congested streets of the peninsula area

I feel that the City is not doing enough to promote and assist the progressing of the South Perth Railway Station.

A lot more work is needed on this - detail on demographics, alternative option and feasibility of Draft ACP objectives. Generally speaking car parking requirements are too low, bike parking is probably too high and there is little consideration for what types of public transport or alternative (taxi, light rail) might be considered. It is naive to think that one parking bay is adequate for a 3 - 4 bedroom apartment. Comment from Real Estate Agents also suggest s"that parking spaces sell apartments". I do not dispute the sustainability objectives but do dispute an ageing and young family population or many millenials are "car-less" or will be withing the time frame of this Draft ACP. I am also not sure it is within the parameters of this ACP to attempt to "socially engineer" the future to this extent.

## Bicycle and Car Parking

Do you have any general comments about bicycle and car parking in the draft ACP?

The use of the word “ensure” is impractical because it is a choice to use public transport and people who live in luxury have the money to pay for parking, however expensive.

There is no real determination to support public transport use by bus, train or ferry. The advent of share-ride services should be the signal to reduce parking spaces but such changes are impossible with the old mindset that is being perpetuated. Not enough political will to do so even though public transport is not paying its way.

It is not mentioned for example that there are speed limits on the Swan River to prevent “wash”.

Many speed limits are in place to minimise the wash created by boats. Therefore it is essential as a boat owner or skipper to maintain a speed that creates minimal wash.

Wash can create serious safety hazards for other boats, especially in marinas and anchorages where there is an expectation of calm conditions.

Wash can also create damage to:

- pontoons

- jetties

- vessels moored to these structures

- vessels in shallow water or anchored on a foreshore

- shorelines and river banks.

The Scheme and Policy should provide guidance on car parking concessions when a development proposes to implement:

- car/scooter/bike sharing schemes

- commercial car parking bays allocated for residential/visitor use after hours and on weekend

As the Draft states use of public transport has decreased and people are more dependent on their vehicles. This will not change. You have to deal with reality - not just what you think would be nice to happen. I live in and am Chair of the Body Corporate of a complex on Mill Pt Road so I know very well what happens - people just park wherever - in other people's bays, on the verges, in the side streets, etc They don't alter their travel arrangements. So it is naïve of the council to think they will change. And to allow .75 of a bay (minimum) is ridiculous. If analogies are being made with the likes of Singapore, then you must also bring in the car tax of around \$60k paid to government when you want to put a car on the road. You can't just take a little piece of the high rise puzzle. You are putting thousands of more vehicles into a throbbing, open wound that already exists and will get worse with high rise in South Perth, Vic Park, Burswood, etc, to say nothing of Curtin Uni plans. You can't just hide and say “we can't control vehicle numbers from outside the area” (as was said to me at a “drop in” chat). The VERY LEAST that can be done is to factor in the existing and future number of vehicles coming from outside the area. There is no other way for the vehicles in the proposed developments to go other than into the open sore. If the developments were dotted around the area (still near transport hubs), the vehicles can go in any direction to mitigate the impact. The air and noise pollution alone from these vehicles waiting for multiple traffic light changes (which will be exacerbated by pedestrian crossing lights) will add to the significant air and noise pollution problems we already have.

Any higher development than currently exists must be accompanied by stringent requirements for the provision of onsite vehicle parking facilities. Approvals should not be given where parking requirements cannot be met. To rely on alternative transport to fill the gap would be a huge mistake and lead to off site parking problems.

Until there is a proven change in the dependence on motor vehicles, then Residential Development: One Bedroom (occupants) should require a minimum of 1 bays per dwelling (not the defined minimum of 0.75 ).

## Bicycle and Car Parking

Do you have any general comments about bicycle and car parking in the draft ACP?

If people want to use bicycles they will. If the council promotes what is an essentially unsafe form of transport by making driving 'inconvenient', you are going to have troubles. There has been insufficient work on the vehicle requirements in this city - your numbers are not supportable in terms of vehicle parking needs in serviced and holiday accommodation, your thumb suck 1:10 car share is a joke to be relegated to April 1. You are hoping that inconvenience will ease the clearly burgeoning problems of trying to fit density in an area with immutable constraints. It is folly. It is the action of someone with no accountability.

Ideally to have a staff parking all day pass or discount fee for the workforce who work for the community/south perth, as the parking arrangement is not benefit to our staff at the moment

We support the City's objectives to promote cycling and reduce dependence on cars. It would be good to see public benefits contributions going towards an improved cycle network to further encourage bikes.

We suggest that reciprocal parking arrangements be accepted to reduce the total number of parking bays within mixed use developments. For example, residential visitor bays are shared with non-residential uses because it's likely these bays will be used at different times.

Car parking above ground should not be measured as plot ratio. This will force car bays underground, which is not desirable. Active measures to reduce car bay ratios will discourage many "downsizers" from moving to apartments. More will choose to move into townhouses or similar in less central locations, actually increasing traffic in the precinct.

The bicycle and vehicle parking proposed in the draft ACP is generally supported. Car parking should be excluded from plot ratio measurement on ground floor and podium.

No minimum car parking for residential development. no minimum car bays for short stay

Should be no minimum car parking for residential, student accommodation or short stay (only a maximum)

Is there enough thought for future electrical vehicle charging? I would suggest supporting car sharing concessions.

There should be no minimum car parking for residential developments.

## **Movement and Access**

Do you have any general comments about the objectives for movement and access in the draft ACP?

Bike and pedestrian pathways need to be separate for safety.

I would have thought the plan had surveyed residents and people travelling through the area to find out how many are transiting through and for the residents, what are their destinations. Then you can start to estimate to what extent public transport can help. Plan has a lot of words but very superficial on detail.

As you are likely cognisant of, improvements to active transport infrastructure, particularly the construction of a train station and expansion of the ferry services, should precede any amendments which will impact and discourage vehicle use of Mill Point and Labouchere Roads. I generally support the initiatives to improve pedestrian and cyclist amenity within the ACP area, however, am concerned that the realisation of both objectives concurrently may not occur as the expansion of public transport services is ultimately a State Government responsibility, whereas making amendments to the local road network is an action the City can undertake, and gain support for, immediately.

The ACP is a disaster for residents and is basically what happened in Soviet Russia. Big Brother in the City of South Perth should address this disaster first and foremost before looking at bikes, leisure walks etc.

Transport and Access (Strategy 4.3)

I generally supportive of the Actions listed under this Strategy, however believe these should be given much higher priority in the LPS. Effective and efficient transport and access is fundamental to the achievability of the population and growth forecasts and intrinsically linked to the success of any managed growth strategy. It is disappointing to see the lack of detail and data to support the Actions identified in this section of the LPS.

The City could become active in funding pedestrian overpasses at the busiest location (Labouchere Rd near Zoo entrance).

Living on the Mill Point Road peninsula I have noticed a considerable increase in speeding traffic since the current tower-building phase began. Also, the number of enormous, articulated trucks that use MPR is frightening.

As most MPR residents appear to be seniors, this makes it a very difficult road to cross, not to mention trying enter the traffic flow when driving.

The installation of two or three pedestrian crossings with refuge islands would improve the situation, but the best option would be a set of traffic lights near the Queen Street t-junction to give locals a breathing space to go about their business. This might also deter the speeding cars that clearly use MPR as a rat-run after coming off the freeway to avoid congestion at peak times.

Objectives are fabulous but don't see too much supporting evidence about how they will be achieved. It is ridiculous to keep referring to a Train Station when there is no State or Federal Government Plan to build said station. The Intellibus has been driving the same route for years, annoying cyclists and drivers on the Esplanade. I hope there is no subsidising of this from CoSP rates - surely all information from the trial has now been obtained? Very pleased to see that an attempt has been made to note pedestrian issues crossing and along Mill Point Rd and Labouchere Rd.

It will be a political decision as to whether a train station is ever built at South Perth. There is little evidence of public transport use by wealthy residents to date. There is no evidence that wealthy developers who are on \$ million plus income will contribute. The shared use path, Kwinana Freeway and Railway are fully exposed to the elements by Melville Water and given climate change predictions will be subject to erosion. The whole notion of excessive growth is an old economic model using metrics that are past their use by date. There are no signs of innovation, just more of the same. The future does not look promising for key workers and the homeless. The risks of overdevelopment have been amply demonstrated in Sydney and Melbourne so why go down that path?

## **Movement and Access**

Do you have any general comments about the objectives for movement and access in the draft ACP?

Obj iii South Perth as a 'destination station'? For what - the Zoo? Will there be a shuttle bus from the Train Station to the Foreshore? Better to concentrate on the Ferry service to Mends Street and extend to Coode St.

A CAT bus around South Perth would be very useful - to include Canning Bridge Station and Angelo Street Shopping Precinct.

The ACP area is incredibly well serviced by public transport (though a train station would be a great addition) so the challenge for the City will be educating and informing residents on the multitude of options and high frequency services that are on offer to encourage modal shift.

Whilst I live and work within the ACP area, I use the bus and ferry services on a daily/weekly basis for both personal and work related travel as it is incredibly convenient.

As someone that crosses Mill Point Road and Labouchere Rd on a daily basis when I walk from home to work and work to home, sometimes multiple times a day when I walk to 12RND Fitness or the Mends St post office/shops/cafes, I don't find either road to create a barrier effect and neither road or the volume of traffic has any impact on my decision to walk.

An additional set of pedestrian priority traffic lights at Mends St/Labouchere Rd might be useful, but not essential until such time that a train station becomes operational.

I would not support an road realignments, such as those suggested in the Public Design Forum process in 2017, including the realignment of Mill Point Road to connect to Labouchere Rd near Mends St/Labouchere Rd intersection.

An additional freeway entry point (heading south) at South Terrace should be given consideration to reduce traffic volumes on the northern portion of Labouchere Rd.

I do not support the "non-peak parking" suggested on Labouchere Road or Mill Point Road. If the City is serious about mode-shift away from the private vehicle additional on-street parking should not be considered.

"Non-peak parking" on Mill Point Road will make it more difficult for residents in the Hillside precinct to enter/cross Mill Point Road due to limited traffic gaps with current traffic volumes/density of development.

It is unclear if the "left-in left-out only" intersections with Labouchere Road in the Richardson precinct allow for right-in movements by vehicles heading south on Labouchere. If not, additional right-in movements are required and suggested at Lyall Street.

The proposed bus priority lane seems too short to achieve any benefit for bus movements, however if longer it would have a significant impact on vehicle movements.

Just get on with it - especially a South Perth / Como train station.

If you were being altruistic, these objectives would be supported. But the objectives are sinister. Dropping the speeds will not help your ineffective simulations. It wont help the chaos you are going to create on the roads. These constraints are immutable, and the only way to avoid total lockdown is to limit density to what can be accommodated.

The City should be commended for its efforts to improve pedestrian safety and amenity.

We support the construction of a new South Perth Train Station and expansion of the Ferry Service. Considering its location, we believe South Perth can lead the way with reduced car dependence and a model shift to more sustainable transport options.

## Movement and Access

Do you have any general comments about the objectives for movement and access in the draft ACP?

I have answered "neutral" to many of the above. Whilst on the face of it they are admirable aspirations - we have to live in the real world and say people aren't going to give up their vehicles. So to predicate any sort of Plan based on optimism at most is naïve and dangerous.

I also note that Objective iii talks about "the detrimental barrier effect of busy roads" in respect of pedestrians and cyclists - but what about the people who reside in the dwellings on busy roads? Why are the residents living on Labouchere Road and Mill Point Road ignored. we suffer with noise and air pollution all the time - NOW. What compensation is being offered to residents to move? What used to be a wonderful place to live has now become a nightmare. Where is there any consideration for residents living on the affected roads? Is the City of South Perth going to introduce a "collateral damage" levels of shire rates? It is extremely difficult to get out of or into the crossover to my residence even now. I have to turn left when I want to go right - do a rat run around the local road to end up back on Mill Pt Road so I can turn left. All the side streets have become rat runs. People park in all the side streets to catch the bus to Perth and the workers in the Mends St precinct I know are parking in the side streets and say it is cheaper for them to cop the occasional fine than it is to park in the parking areas. To predicate a Plan (which will forever negatively change our once beautiful South Perth) on an airy fairy concept of a train is ridiculous. The government has never promised the train and with all the draws on its finances it will never put in a train. It would be political suicide for any government to do it - there are too many areas which have little or no public transport. The City also conveniently overlooks the negative impacts on residents and ratepayers of having a train station in South Perth - litter, crime increase (gauged at 30% increase), even more parking problems, anti social behaviour, etc, etc. The City of South Perth "Governance Framework" June 2016 states at 3.5 that the "Role of Councillors is to ...Represent the interests of electors, ratepayers and resident of the City...". It is not serving the interests of electors, ratepayers and residents to (1) have a train station and (2) predicate any sort of Plan on the vague notion of having one. We know that a train station is not even in the long term plans of the state government. The Mayor and Councillors are in breach of the Governance Framework of the City.

Do not support the building of a South Perth train station at the proposed ridiculous location. Bus (30, 31, 32, 34, 35 & Curtin bus) and ferry transport is more than adequate.

The continual reliance by City planners on having a South Perth Train Station goes against all state government transport plans. If ever a South Perth Train Station was to be planned and developed, the current location adjacent to Richardson Park is the last place the station should be placed. If anything, it should be immediately adjacent to the freeway entry at Judd/Mill Point Road. Preference would be for a station on an underground City Loop that is yet to be planned, funded or developed and therefore many years from becoming a reality. It is also folly to consider that there will be any measurable and/or meaningful reduction in the amount of traffic flowing through the ACP without significant commitment by main roads (state government) to improve access to and from the area, especially where large developments and infill will compound the existing problem.

I live on the peninsula and work 4.2 kms away. I am 66 yrs old and hope to be working for awhile and looking forward to living a healthy life for another 20-30 yrs. The difficulty is now sometimes getting off the peninsular at the lights through 3 rounds with the current population. Transport is my major issue. I would not ride a bike when it is wet as too dangerous so this is an issue in winter with the expectation that everyone will ride bikes.

No

The movement and access principal in the draft ACP is generally supported.

Just get on with it - especially a south perth train station



## Public Realm

Do you have any general comments about the objectives for the public realm in the draft ACP?

The City has played its hand in Connect South. It cares little for green open spaces with access to ferry transport preferring concrete instead. The City must be stopped from filling our green open spaces with concrete.

N/A

I believe the council will need to maintain the "mid block links", it will be too hard to arrange with 4 sets of strata companies and owners. The construction, maintenance and insurance will be difficult to implement.

If they are well implemented, they will prove a wonderful feature and improve walkability of the area.

Mid Park Links , are not practical, and the locations in the ACP state they will be, located where shown on the Public Realm Plan, no discussion or negotiation , it also does not state mention if a base height is developed no Mid Block link is required, even if three other land owners agree. The ACP also states it will remain private land which means it may possibly be owned by 4 different Strata companies or land owners, the Maintenance, Insurance and ongoing management will be a nightmare. The same with the proposed Pocket parks the up keep if both the Mid Block Links and Pocket Parks are introduced, the up keep should be with the City.

Strongly oppose the concept of mid block links.

1. Private mid-block links are to be located as identified in Plan 5 - this appears to be a forgone conclusion without any consultation. However pocket parks is not specific and is general so why the difference??? For consistency Mid Block links be generic also.

2. And must be of sufficient width and designed to provide a sense of safety - this is too ambiguous . i see it as that the land is set aside for nothing

3. Allow unobstructed access to the general public at all times - the building walls provides a great Graffiti and vandalism opportunity. also provides a corridor for criminal activity

4. Provide an uninterrupted paved pedestrian path for its full length - this will be an expense to the owners so why should the owners be penalised.

5. Function as an extension of the public realm with no gates or other obstructions which create visual or physical separation - what public realm

6. Be sufficiently illuminated to maintain public safety and encourage activation, Again this will be an expense to the owners so why should the owners be penalised.

7. Appropriately respond to adjoining ground floor facades, with screening of blank or service areas and direct interface with, windows, private communal areas, commercial tenancies and other active facades. So in essence you are designing a building around walkways - case of tail wagging the dog.

8. Where creation of a mid-block link is proposed, formal protection through an easement or other legal instrument may constitute a public benefit contribution as detailed in Section 7.5. i read this that there is no guarantee of any benefit for the Owner/Developer at all for the land ceded or costs to build so if there is no guarantee why would they want it???

In addition what happens in the event when one owner only develops to Base height? i understand that no Mid Block link is required, which then puts paid to a link for the other three owners.

Also by having these links acts as a obstruction to different owners combining their land holdings together to form a larger piece of land in which to develop.

Strongly oppose privately owned public spaces. It doesnt serve any real purpose or add value to the community. Given the short length of streets and close proximity of the foreshore, zoo, richardson park why would people want to go to a small landlocked patch of space when they could walk 2 mins and have all the space they want? Again an expense paid borne by the developer/owner.

Mid block links and pocket parks are an absolute imposition and are not required in the richardson character area.

The position of these links as pocket parks should be a general position not where they are shown on the public realm map.



## Public Realm

Do you have any general comments about the objectives for the public realm in the draft ACP?

What can I say - all opportunities for further investigation?

Fine objectives that seem almost unattainable given what I have read about Building Size (Height and Plot Ratio), Podiums, Towers and Design Quality.

Contradiction once again, between the objectives outlined in the Draft ACP and the reality of what is permitted to be built according to Draft Amendment 61.

Heed the history that explains why the landscape is how it is today. Don't be bulldozed into going at a faster pace than necessary to build apartment towers to become a global city. That model is on the wane and the warning signs are pretty clear that the planet is under threat from overpopulation and exploitation of natural resources. There is little consideration in the background reports of the people who will have to live with the products that are already suspect due to water penetration, structural failure, fires and contaminated ground. Public confidence in this future shape or creation is decreasing rather than increasing. Tourism is also changing rapidly to an eco-tourist model for example.

Public Open Space is just that - public. It should not be used for events that enclose areas and charge for admission. The Objectives sound reasonable but can see no information about, or reference to, controls regarding noisy events close to residential areas ie along the foreshore.

There is a need for much better lighting in Windsor Park and along the internal road running along the northern end of Perth Zoo. Windsor Park and the Zoo road/footpath link between (Mill Point and Labouchere) are the primary pedestrian connections linking Richardson (12 RND Fitness, Jersey Jack Gelato, Southside Espresso and Love and Latte) with the residents within the Hillside precinct. Pedestrian amenity and safety could be dramatically improved with better lighting and the removal of low shrubs/hedges along the footpath/car park. These small improvements would support a greater mode-shift to walking for a greater proportion of local trips.

I question the need for pocket park opportunities in areas:

- abutting/opposite extensive areas of open space, such as Richardson Park and the South Perth foreshore (with the exception of those on Mends St)
- overlooking the freeway (this is not a pleasant area due to weather exposure in winter and road traffic/rail noise all year)

In Singapore public access is provided to apartment tower rooftop gardens, communal areas and spaces where the amenity is higher due to separation from street-level traffic noise and incredible views. These opportunities could form a park of the additional development potential and public benefits considerations.

I don't believe that the "mid block link opportunities" are warranted. Efforts should be focussed on improving the streetscape and pedestrian amenity of existing streets within the Richardson precinct, such as built form outcomes that deliver continuous awning protection of footpaths along Richardson and Lyall Streets and along Melville Parade and Labouchere Rd.

I do not support the very early selection of Mid Block Links and Pocket Park placement as there must be flexibility

More effort needs to be put into preserving existing trees and green landscapes. For example, the removal of around 4 palm trees and the same number of Plane trees from around the Mend Street Jetty site was unwarranted. New structures could easily have been located to preserve existing trees.

It is ridiculous to include the Perth Zoo Reserve in any Public Space calculations unless access to the Zoo is granted at all times and without charge. As that is unlikely to happen due to safety and security reasons, it should be excluded.

DO NOT expect any significant addition to green space, experience elsewhere refutes the hypothesis. Pocket parks in Melbourne have become grubby unsafe areas. You don't have the scope - this is a brown not greenfield. Any addition to date of open space is restricted to an upper floor of a new building - not a public benefit. It won't happen unless the council resumes land.

If some of these benefits are provided by private developers, they should be valued and deducted as a public benefit cost.

## Public Realm

Do you have any general comments about the objectives for the public realm in the draft ACP?

Landscape area along side and rear setback can become wasted.

The location of pocket park suggested in the draft ACP require reconsideration.

The concept of making Mends Street and South Perth Esplanade prioritised pedestrians or cyclists when you have not provided any alternative for road upgrades or parking for most vehicles is very poor planning and will result in the long term of being isolated or avoided except for a small group of local residents with most retail stores closing. ie. Subiaco. the provisions of links and pocket parks will further encourage the already existing problems of litter resulting in the Mends Street area a no go zone at night.

In regards to pocket parks, a person purchasing land should not have to become responsible for the cost of maintaining a City of South Perth facility.

By creating a pocket park alongside a block of land will have the effect of reducing the security of the residents.

The concept of making mends st and south perth esplanade prioritised pedestrian and cyclist when you have not provided any alternative upgrades or parking for motor vehicles is very poor planning and will result in the long term of being isolated and avoided except for a small group of local residents with most retail stores closing. ie. subiaco.

The provisions of side link and pocket parks will further encourage the already existing problems of vagrants and litter resulting in mends area a no go zone at night.

In regards to pocket parks a person purchasing a home unit should not have to become responsible for the cost of maintaining a city of south perth facility.

By creating a pocket park along side a block of home units it will have the effect of reducing the security of the residents.

No paid parking in business areas

No paid parking in business areas

## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

Very general document with lots of words designed to give no hard facts or plans

Yes but these are overall comments relating to the complete document so please accept these for all parts rather than repeating many times over.

The destruction of South Perth as we know it is not wanted. The mass infill concept that is taking place as well as what is proposed has destroyed a once desirable place to live. The village feel has disappeared in South Perth as has in Subiaco and Mount Lawley, where infill and shop closures dominate their environments so why are we following like sheep.

The South Perth area that has green tree-lined streets, quiet streets with lovely well kept homes on decent sized blocks as well as being of close proximity to the city and other amenities is a well desired place to live and has no logical reason to destroy in the manner planned. Greed driven developers are the bane of our society and the Council has to stop listening to the greedy elements before it is too late.

More high rise I guess will happen but at least make it within sensible heights and within infrastructure limitations, please don't pack in more sardines and of course with the obligatory "affordable housing" opportunities. We do not see this happening in the Western suburbs where the rich and famous live, so why are we trying to emulate a cramped style of living on our doorsteps of which will end up being a run-down ghetto in years to come when the flash new apartments become "tired" and the upkeep cannot be afforded by residents of which the greedy developers are not having any part of as they will be long gone.

With regards to "THE" train station...please do not pursue this any further as we do not need it. Current public transport is more than adequate, increase buses and ferries as the need dictates. The peak-hour train coming in from the south in the morning is already full by the time it gets to Bull Creek so why does anyone think there will be room when it gets to South Perth ? There is no room to increase the railway system today let alone in 20 years time unless its buried below ground. The train also brings in opportunist bad elements from other areas so don't give them another conduit into our somewhat relatively peaceful suburb. In addition why would anyone walk from Labouchere rd down to the potential train station on Richardson st where the current buses are plentiful. There are plenty of transport options already so in my mind keep the train station out of South Perth.

Residents of South Perth area love where we live so please stop trying to turn it into something that we do not want. It is South Perth being a desirable place to live that we need to maintain focus and not change it.

The height limits proposed particularly in the Mill Point zone are woefully too low. This area has a high degree of connectivity to the Perth CBD, ferry and freeway entry as well as walkability factor and the least area affected by shadowing of tall structures. The area is the visual gateway to the area and so is entirely appropriate for supertall structures of 150m to 200m. There needs to be many more landmark sites where heights would be determined by design excellence and public benefit, rather than being limited by a prescribed height. The city needs a series of signature tall towers to establish it's "face" and identity as a city and destination in it's own right.

## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

### 4.3.3.2 Entertainment Noise

It is essential that the South Perth Activity Plan includes a statement that when the developer is preparing an application that they must comply with the Environmental Protection (Noise) Regulations 1997 to ensure that all mechanical equipment noise levels, public noise levels and noise levels during waste disposal and collection are kept below the required standard.

### 4.3.3.4 Overshadowing

States "Development shall not cast a shadow over more than 80% of any adjoining lot for more than 2 hours between 9am and 3pm on 21 June. Shadow diagrams are to be submitted demonstrating compliance with this requirement as part of the development application".

It is essential that the South Perth Activity Plan be amended to state that a number of simulations be assessed to determine the effect on natural daylight and sunlight received. These include:

- Obstruction Angle Test

- Vertical Sky Component

- No Sky Line / Daylight Distribution within each room

- Annual Probable Sunlight Hours Received

- Overshadowing to any neighbouring Gardens or other Open Spaces

The draft Activity Plan grossly under estimates the sun light requirements for neighbouring properties. For example the "Obstruction Angel Test" ensures that internal daylight levels are maintained for surrounding properties, the Vertical Sky Component ensures that surrounding property windows receive a minimum of 30% or greater of natural daylight into the room. Developers should be required to use a comprehensive Climate Based Daylight Modelling as it provides far greater detail about light distribution and intensity for the proposed building design to be adjusted to maximise the use of sunlight and daylight to neighbouring properties. Actual location dependant annual weather data is used to calculate lux levels and targets can be set so that neighbours also receive sun light and that overshadowing

### 4.3.4.1 Sustainability

States that "All development to which the City of South Perth Local Planning Policy P350.01 Environmentally Sustainable Building Design applies shall achieve and provide certification of at least a four star green star rating under the relevant Green Star rating tool".

The Building Code of Australia states that as of November 2011 6-Star rating is the current minimum requirement. Therefore the City of South Perth development requirements for sustainability need to be increased to state that certification of at least a six star green star rating under the relevant Green Star rating tool".

### 4.3.4.3 Deep Soil Zones

States that "All development sites shall include at least 12% of the site area at ground level allocated and designed for deep soil zones, suitable for accommodating mature trees, and with a minimum dimension of 6.0 metres. This allocation may be reduced to 8% where an existing tree worthy of retention is proposed to be retained"

Reducing the 12 % ground level allocation down to 8% where an existing tree worthy of retention is counter productive. The mature retained tree requires deep soil zones but also requires drip zone space for surface roots and adequate space for light penetration. Reducing the ground level area will negatively impact the public / private realm amenity around the tree and will negatively impact the tree or trees.

### 4.3.4.4 Groundwater Management

States "Where a development proposes basement(s) a dewatering management plan must be submitted with the development application that details the proposed dewatering process and how de-watering issues will be managed. The plan shall address contingencies to be put in place to satisfactorily manage issues that may arise during and after the de-watering process".

## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

De-watering of a site will most likely negatively impact adjoining neighbours who may have ground water bores and may increase the likelihood of saline intrusion into the aquifer. The South Perth Activity Plan should also state that "Any de-watering proposals will be subject to the Department of Water & Environmental Regulation consideration".

### 4.3.4.5 Stormwater Management

States that "A stormwater management plan must be submitted with the development application to demonstrate the appropriate management and disposal of stormwater from a proposed development. Stormwater shall be connected to the local drainage network or otherwise disposed of in accordance with an approved stormwater management plan".

This statement will require the City of South Perth ratepayers to fund upgrades to the Cities existing storm water drainage network. It is therefore requested that the City only permit developers to connect to the stormwater system, in the following circumstances:

- a) all on-site stormwater retention options have been investigated and exhausted;
- b) only developments in areas where the natural soil is deemed unsuitable for on-site disposal via a that detention tank to control storm water filtration into the ground aquifer before being considered for connection to the Council's stormwater system. This should be verified as part of the geotechnical investigation in addition to the site classification and it can be demonstrated by a qualified civil engineer to the City's satisfaction that on site disposal is not feasible.

### 4.3.6.3 Servicing Design

States "A waste management plan shall be prepared for each new development and submitted with the development application to ensure refuse collection can be undertaken in accordance with the requirements of the local government. Servicing and utilities elements should be screened from view or, if required to be on the outside of the building, should be integrated into the fabric of the building". It is essential that the developer comply with the Environmental Protection (Noise) Regulations 1997 when preparing a waste management plan and in particular the manner in which waste will be disposed and collected to ensure noise levels is kept below the required standard.

### 5.1.2 Signalised Intersections

States Signalised intersections with pedestrian phases should be added or enhanced at the Mill Point Road/Labouchere Road and Judd Street, Mends Street and Mill Point Road, Richardson Street and Labouchere Road, and Angelo Street and Labouchere Road intersections in accordance with Plan 4. Studies have shown that roundabouts are safer than signal-controlled intersections. Pedestrian crossings can be positioned in a location that will provide safe road crossing inclusive of pedestrian refuge in the centre of the road

Roundabouts reduced injury crashes by 75 percent at intersections where signals were previously used for traffic control, according to a study by the Insurance Institute for Highway Safety (IIHS). Studies by the Insurance Institute for Highway Safety and USA Federal Highway Administration have shown that roundabouts typically achieve a:

- 37 percent reduction in overall collisions
- 75 percent reduction in injury collisions
- 90 percent reduction in fatality collisions
- 40 percent reduction in pedestrian collisions

There are several reasons why roundabouts help reduce the likelihood and severity of collisions because of lower travel speeds, drivers do not attempt to beat the lights and one-way travel, which makes it easier to manage the traffic.

### 5.2.3 South Perth Train Station

States "a Train station should be constructed at the location established within the Kwinana Freeway median, in line with long term strategic planning. Development opportunities within adjoining public land, and associated value capture potential should be investigated".

## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

It is recommended that the new train station for South Perth should be integrated into the basement "Landmark Site" which is located between Mill Point Rd/ Labourchere/ Mends St, as this site will better service the district. The City should lobby the State Government to construct an underground train line from the Central Business District to the Landmark site, and continue up Labourchere road to Preston Street and reconnecting onto the freeway.

The draft Activity Centre proposal for a train station within the Kwinana Freeway median, will not provide adequate public transport for the district. It is too far away from the majority of residential properties and the freeway carriageway is already restricted for usable space.

### 6.3.1 Key Issue: Site Availability and Development Capacity

States in part that "An industry accepted figure for undertaking modelling and forecasting is that 25% of strata subdivided buildings would develop between 2016 and 2051, corresponding proportionally to about 18.5% for the period covered by the ACP projections (2016-2041)"

On this basis the proposed Activity Centre Plan will have an "ad hoc" impact on the character of South Perth, with older buildings being set back and then newer developments being permitted to the property boundary. This will create a negative impact on the character and amenity of the precinct. An example is the newly constructed building on Labourchere Road/ Charles Street, which has been built to the property line and is completely out of character for the area, and overshadows the South Perth Zoo, no vegetation or landscaping buffer has been provided in the front of the building, whereas other developments have a landscape buffer.

I really like the tiered and towers concept.

Considering the draft ACP as a whole, I wish to reiterate an earlier comment. It seems to lack a bold vision about what CoSP can do to enhance existing attractions. For example, CoSP could offer to fund a roof for the South Perth Railway Station. A boost for the Zoo, create a tourist feature (Perth's largest public building solar panel roof, inspired by Berlin's Hauptbahnhof, but with a viewing platform on top), and generate income for CoSP. Another example, a wide bridge over Labouchere Road, accommodating a restaurant/tearooms for Zoo visitors; Zoo can change existing tearooms into animal accommodation; give a safer crossing for pedestrians from Richardson St carpark and Station; could also accommodate non-Zoo patrons after Zoo closing. Inspired by a well-known bridge in Florence.

Dear Sirs

Ref Draft Strategy Plan and Building Heights.

Whilst acknowledging the need for increase in heights, I wish to promote one minor change which would have a dramatic Town Planning effect.

Good Planning practice in the areas of the Freeway, the Richardson Park, the Mends St waterfront area and the open Space of the Hillside Park has been used to graduate the building heights rather than be confronted with a wall of tall buildings.

This is not the case on the Peninsula.

Firstly, it is not good practice to overshadow the main feature of the Peninsular boulevard with tall buildings and the height limit should be LOW-MEDIUM and thereby restricted to approximately 10 storeys. This will integrate with the existing 8 storeys.

Importantly, the "BLANK WALL" effect at Fraser Lane should be restricted in height on both sides of Mill Point Road to a new class MEDIUM AND TIER 1 ONLY, thereby restricting the height to 37.5m being approximately 12 storeys.

Both conditions would result in a sensitive integration of new heights with the existing. A Plan is attached wherewith indicating the areas referred to.



## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

- The draft scheme is planning for an additional ~4500 dwellings in this very small area. It's extremely excessive given there is no train station and not likely for many years. The rationale for these additional dwellings is flawed and akin to putting the cart before the horse. The ACP area is not a "District Centre" or in need of a huge population increase according to the WAPC framework.
- The increased density is NOT based on relevant evidence and the population forecasts are unsupportable by critical 'independent' examination.
- The large population increase that will change the demographic considerably contradicts the population forecasts and it's all been done without a current 'Housing Needs Analysis'
- The Planners are aiming to increase density to "the maximum possible" WHY??
- Many independent planners agree that the future density should be calculated according to what is optimum for this unique area.
- The public open space has included the ZOO (which is not freely open to the public) but including it allows for a density approaching 50 - which crazily, is equal to a CBD.
- There are still large podiums allowed for residential areas and heights allowed for buildings that are not appropriate, sensible or needed.
- There is no evidence provided by planners that high rise residential towers are the best and healthiest form of additional dwellings, nor how these would enhance and improve liveability in the area.
- There is no current, complete and cumulative traffic model that includes the ~4500 new dwellings that are proposed?
- There is no Ground Water Study and after the debacle of the Aurelia development which has caused long term damage to the water table, we believe this is an urgent action that should be completed before any approval.
- There is no environmental impact study on Perth Zoo nor the current residents from the planned built form.
- How can we assess the impact on our neighbourhood if we are not shown accurate numbers, simulations or models?
- The initial intent of the scheme was to revitalise the Richardson St block, but there is little here to encourage development before the Mill Point area was not in need of any incentives and where are the employment opportunities?
- We are also concerned that much of the population forecasting has been deliberately calculated to accommodate the developer's outrageous proposals from the past 5 years, rather than starting with a clean slate and planning for sensitive, sustainable growth.

\*\*\*The City of South Perth must resist any and all attempts by developers to simply ADD MORE RESIDENTS, then pack up and leave with their carelessness and ill-gotten profits. The original ratepayers would then be left to pick up the pieces in terms of reduced amenity, inaccessible cafes and restaurants (overcrowded), and untenable traffic conditions. Development is welcome (such as the Mends St Piazza and Mall, etc), but development MUST include sensible height restrictions as well as ADDING and IMPROVING infrastructure and amenity - NOT just adding thousands of additional residents all competing for the same roads, public space and entertainment. We think the entire concept of a railway station is a complete crock, arguably unnecessary and highly unlikely to ever see the light of day in our lifetimes. Adding a plethora of ultra high towers on the peninsula is not the answer due to the above. Finally, they will completely destroy the already eroded value of our homes here. We would certainly be open to join any class actions against those responsible for any wilful destruction of amenity and value on the peninsula. Thanks for the opportunity to comment.



### General Question 1

Do you have any general comments about Part 1 of the draft ACP?

Draft ACP looks very 'slick'. However, the language used is all planning/developer jargon - a plain English version should have been made available. As it is with 9 Feedback forms the impression is that this is a distinct disincentive for people to grapple with the intentions of the plan. The jargon used has the potential to confound/confuse those with backgrounds in other professions. With each objective there could/should have been the opportunity to explain the level of support.

Firstly thank you for the comprehensive information you provided. My main feedback would be around the considerations around diverse population including people with disability and aboriginal people in our community. People with disability needs specialist consideration with regards to their movement and access as a minimum, however it would be beneficial with an ageing population and one and five Western Australia is identifying as having a disability, to provide more information on what provisions are being made for this cohort of our community. Consideration around toileting and restroom facilities, requirements around accessibility during construction, I thought a bowl and accessible housing options to Silver or gold standard, and accessible public open spaces within the area. I would also like to see more consideration of the first people of Western Australia and recognition of their culture and heritage within the plan. Precinct, street or POS names, public artefacts and other options for recognising the important areas of our land and the aboriginal history culture and traditional ownership would be a good start.

I am generally supportive of the discussion regarding the Four Character Areas of the ACP with their associated Character Statements. However, some of the Design Controls contained in Amendment 61 will totally change sections of the Character Areas. This makes Part 1 of the draft ACP incompatible with Amendment 61. One example of this is the 'yellow dotted line' showing Tier 2 potential, in particular its encroachment into the Mill Point Character area. It seems illogical to overlay parts of the (now outdated) Railway Precinct Special Design Area with the objectives of the draft ACP and draft A 61.

Don't need Wombat Humps along roads feeding into Mill Point Road - Stop signs and Pedestrian Zebra Crossings will achieve same safety effect, cheaper and more aligned to community aspirations.

The population figures for the SPACP seem to high. The Appendix 1 is blank so the reference in Part 2 6.2.1 can't be checked.

## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

I have looked through many sections of the ACP documentation and am overwhelmed by the detail it contains. I am a layperson, not involved in town planning and not fully conversant with the terminology and language presented to me. I will therefore make my comments under 'general comments' and trust that the City will consider them as general comments to the entire ACP.

1. I feel bulk and scale being considered in the area is excessive. I do not believe the potential need for CBD-sized buildings is demonstrated, desired or beneficial in the Peninsula area.

2. The ACP does not appear to offer protections for users and residents of the area over the interests of those who only interest is to profit from developing (and then leaving) the area. The City's TPS should offer strong regulation and protections from this type of development.

3. The ACP appears to be about the buildings rather than how ancillary services (eg supermarkets, retail, big box etc, rather than an activated street front of restaurants, offices and coffee shops) is provided in the area. Until these are understood and defined, the ACP does not appear to have a well defined guiding strategy on which to align planning and area development decisions.

4. The ACP does not appear to attempt to value the softer factors that contribute to 'amenity' and does not quantify how more objective amenity issue will be measured. Sunlight, shade, traffic, overlooking, parking, views, crowding, services etc all contribute or detract from to 'amenity'.

5. The ACP does not appear to define how movement around the Peninsula area will occur. Recent development in the area seems to allow developers to maximise footprint (and therefore saleable/ lettable areas) without consideration of pedestrian movement between buildings. Earlier concepts of the area seemed to indicate pedestrians could move quite freely between buildings (away from the street) – which would require, for example, the ACP defining mandated building connection points at ground level.

6. The new 'glass shopfront and driveway' developments in Harper Terrace feel more like a back alley to Mends Street businesses than an activated street front. I hope the ACP prevents expansion of these types of development.

7. The City does not appear to have separated or contrasted the conflicting interests of stakeholders – instead, it has attempted to obtain and analyse those views in public forums where many parties interests were represented but not properly heard.

8. I am unsure of why the Plan refers to a train station precinct. State government has no plans for a train station in the area, and continual referral to such may create confusion with users of the ACP who may see lack of alignment between state and local government.

9. I feel that the formal questions asked in this consultation process are leading, complex and poorly worded. Statistical results from the process are not likely to be reliable and may conflict with comments provided.

10. I do not believe the City's planners understand the Peninsula area well enough, despite years of consultation and engagement, to develop a plan that harnesses what makes the area important. Instead, the planners seem to want to make the area 'something else', led by with more references to other cities and regions than amplifying the existing attributes that the locals love about the Peninsula area.

11. I do not have confidence in the City's planners to manage this issue. They have been steadily worsening the outcome of the area since 2013, and the City's opinions appear to be dominated by developer interests while being insulated from the opinions of those who pay rates to the City and live in its boundaries.

## General Question 1

Do you have any general comments about Part 1 of the draft ACP?

I do not understand why the obvious heritage precinct focussed on the cross road of Mends Street and Mill Point Road isn't made a feature of. The Windsor Hotel, The Zoo, Heritage House, the Old Mill Theatre and the Post Office and Police Station deserve unity in their historical interpretation.

I do not have car and am keen to have less car parking for residents in tower blocks as I don't think the roads can cope with the number of bays suggested.

There should be more secure bicycle parking so that lycra groups don't block the pavement.

Pedestrian safety at the intersection of Labouchere Road and Mill Point Road should be improved.

I like "pocket parks" and would like to see some help in making these community gardens with vegetables and fruit.

I would like more regulation in dealing with a rising water table and the aquifer that underlies the Mends Street area.

I would like a plan for dykes to combat rising sea levels. This will affect all your plans. Buildings should be stable even if the basement is flooded.

I don't object to towers if the planning maximises privacy and there is public space between buildings.

I see you have Judd Street - can you tell the sat nav systems that it exists as not even the police knew where it was when I gave it as a location reporting kids climbing the crane at Aurelia. My Uber and Ola drivers have Mill Point road at three roads, which is stupid.

I have not found this feedback easy to use - is it because I have a mac? I follow the instructions to get a form but don't get one. This is all I could find and you'll have to sort out if some of my comments should be in Part 2 as I can't check. Sorry

While not specifically on Part 1, I am concerned about the age group selections for this survey, and specifically the fact that all over 65's are lumped into one age group. My mother who lives in South Perth who is 88 years old has very different needs to my friend who is 66 year old. It is a concern too that 0-14 is a valid age group to provide feedback on an ACP.

Part 1 has many areas requiring improvement.

Building Height should be expressed as stories and not meters. Meters encourages lower floor to floor heights which diminishes design quality.

The setback provisions, particularly for podiums have not been tested and are problematic.

Most other items covered earlier in survey.

Podium and tower setbacks require more work.

The objectives of Part 1 is generally supported except ceiling height, podium and pocket park locations. The ceiling height in the ACP does not align with the maximum podium height in AMD 61. The podium setback should allow more flexibility to address site context. Landscaping along side and rear setback can become wasted land.

## General Question 2

Do you have any general comments about Part 2 and the Appendices of the draft ACP?

I support the proposed building heights be taken from existing ground levels (and not from (I understand) the current planning scheme to be from 2.3m AHD).

The City of South Perth must resist any and all attempts by developers to simply ADD MORE RESIDENTS, then pack up and leave with their carelessness and ill-gotten profits. The original ratepayers would then be left to pick up the pieces in terms of reduced amenity, inaccessible cafes and restaurants (overcrowded), and untenable traffic conditions. Development is welcome (such as the Mends St Piazza and Mall, etc), but development MUST include sensible height restrictions as well as ADDING and IMPROVING infrastructure and amenity - NOT just adding thousands of additional residents all competing for the same roads, public space and entertainment. We think the entire concept of a railway station is a complete crock, arguably unnecessary and highly unlikely to ever see the light of day in our lifetimes. Adding a plethora of ultra high towers on the peninsula is not the answer due to the above. Finally, they will completely destroy the already eroded value of our homes here. We would certainly be open to join any class actions against those responsible for any wilful destruction of amenity and value on the peninsula. Thanks for the opportunity to comment.

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- The increased density is NOT based on relevant evidence and the population forecasts are unsupportable by critical 'independent' examination.
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- How can we assess the impact on our neighbourhood if we are not shown accurate numbers, simulations or models?
- The initial intent of the scheme was to revitalise the Richardson St block, but there is little here to encourage development before the Mill Point area was not in need of any incentives and where are the employment opportunities?
- We are also concerned that much of the population forecasting has been deliberately calculated to accommodate the developer's outrageous proposals from the past 5 years, rather than starting with a clean slate and planning for sensitive, sustainable growth.

## General Question 2

Do you have any general comments about Part 2 and the Appendices of the draft ACP?

No traffic studies re: Mill Point Character Area, specifically the Peninsula.

Further clarification needed for the some demographic conclusions eg. one/two bedroom dwelling numbers, evidence that reducing parking bays in new buildings will impact car use, discussion of electric cars?

Analysis of the Real Estate Market in the ACP area.

See 1

Do not support some of the rationale in relation to building height and setbacks.

The objectives of Part 2 is generally supported. The details described in 7.3 Built form require further clarification. Controlling development scale through both plot ratio, building setback, height and footprint is excess. There are discrepancy between the ACP and AMD 61 and its causing confusion.

Very general document with lots of words designed to give no hard facts or plans

No comments.

Not sure what Part B is.

### General Question 3

Do you have any general comments about Amendment No. 61?

The intentional destruction of property values undertaken by the South Perth City Council in the precinct has not been addressed. The amendment should include compensation for the victims of this amendment including but not limited to compensation for losses on property sales, a rates holiday for say up to 10 years for all properties built prior to 2014 and free public transport for 10 years.

Overall there is too much focus on providing for high density living in South Perth with little consideration of the effects on the current residents of South Perth or the results of creating a high density community eg. traffic, congestion, lack of infrastructure, noise, pollution of the environment eg loss of trees & plants, dust, construction. Tourists and residents appreciate variety the current plans indicate that South Perth will rival Perth CBD insofar as building mass and height and will end up just another concrete & glass city.

Building heights and plot ratio levels are far too conservative. Particularly in the Mill Point zone, can be raised significantly due to prime location. All sites around the Mill Point Road and Labouchere Rd Intersection should be designated as landmark, with no height limits. The city needs to provide multiple sites where the tallest building in the area can be constructed, possibly with an observation deck as a public benefit. The city will create an identity by allowing some signature towers of 150 to 200m to be built. The amendment and part 1 does not create enough sites to allow this to occur. Landmark sites should make up to majority of sites in the absolute core, where the zones intersect. In general, the plan is too restrictive and too conservative for building height. The plan currently does not provide certainty to developers about how much public benefit is acceptable for various levels of bonus. Examples should be provided such as where a building proposed on a site with a 100m limit, could go to 140m. There is no framework established for a precedent to work from. The council has not set out what amount of public benefit is required for what level of bonus. The city should be encouraging as much development as possible, whereas these changes seem to want to cap development, rather than guide it. Free up more sites where there are no restrictions and allow developers to be creative in their approach to proposals on those sites.

#### 4.3.3.2 Entertainment Noise

It is essential that the South Perth Activity Plan includes a statement that when the developer is preparing an application that they must comply with the Environmental Protection (Noise) Regulations 1997 to ensure that all mechanical equipment noise levels, public noise levels and noise levels during waste disposal and collection are kept below the required standard.

#### 4.3.3.4 Overshadowing

States "Development shall not cast a shadow over more than 80% of any adjoining lot for more than 2 hours between 9am and 3pm on 21 June. Shadow diagrams are to be submitted demonstrating compliance with this requirement as part of the development application".

It is essential that the South Perth Activity Plan be amended to state that a number of simulations be assessed to determine the effect on natural daylight and sunlight received. These include:

##### Obstruction Angle Test

- Vertical Sky Component
- No Sky Line / Daylight Distribution within each room
- Annual Probable Sunlight Hours Received
- Overshadowing to any neighbouring Gardens or other Open Spaces

The draft Activity Plan grossly under estimates the sun light requirements for neighbouring properties. For example the "Obstruction Angel Test" ensures that internal daylight levels are maintained for surrounding properties, the Vertical Sky Component ensures that surrounding property windows receive a minimum of 30% or greater of natural daylight into the room.

Developers should be required to use a comprehensive Climate Based Daylight Modelling as it provides far greater detail about light distribution and intensity for the proposed building design to be adjusted to maximise the use of sunlight and daylight to neighbouring properties.



### General Question 3

Do you have any general comments about Amendment No. 61?

Actual location dependant annual weather data is used to calculate lux levels and targets can be set so that neighbours also receive sun light and that overshadowing

#### 4.3.4.1 Sustainability

States that "All development to which the City of South Perth Local Planning Policy P350.01 Environmentally Sustainable Building Design applies shall achieve and provide certification of at least a four star green star rating under the relevant Green Star rating tool".

The Building Code of Australia states that as of November 2011 6-Star rating is the current minimum requirement. Therefore the City of South Perth development requirements for sustainability need to be increased to state that certification of at least a six star green star rating under the relevant Green Star rating tool".

#### 4.3.4.3 Deep Soil Zones

States that "All development sites shall include at least 12% of the site area at ground level allocated and designed for deep soil zones, suitable for accommodating mature trees, and with a minimum dimension of 6.0 metres. This allocation may be reduced to 8% where an existing tree worthy of retention is proposed to be retained"

Reducing the 12 % ground level allocation down to 8% where an existing tree worthy of retention is counter productive. The mature retained tree requires deep soil zones but also requires drip zone space for surface roots and adequate space for light penetration. Reducing the ground level area will negatively impact the public / private realm amenity around the tree and will negatively impact the tree or trees.

#### 4.3.4.4 Groundwater Management

States "Where a development proposes basement(s) a dewatering management plan must be submitted with the development application that details the proposed dewatering process and how de-watering issues will be managed. The plan shall address contingencies to be put in place to satisfactorily manage issues that may arise during and after the de-watering process".

De-watering of a site will most likely negatively impact adjoining neighbours who may have ground water bores and may increase the likelihood of saline intrusion into the aquifer. The South Perth Activity Plan should also state that "Any de-watering proposals will be subject to the Department of Water & Environmental Regulation consideration".

#### 4.3.4.5 Stormwater Management

States that "A stormwater management plan must be submitted with the development application to demonstrate the appropriate management and disposal of stormwater from a proposed development. Stormwater shall be connected to the local drainage network or otherwise disposed of in accordance with an approved stormwater management plan".

This statement will require the City of South Perth ratepayers to fund upgrades to the Cities existing storm water drainage network. It is therefore requested that the City only permit developers to connect to the stormwater system, in the following circumstances:

- a) all on-site stormwater retention options have been investigated and exhausted;
- b) only developments in areas where the natural soil is deemed unsuitable for on-site disposal via a that detention tank to control storm water filtration into the ground aquifer before being considered for connection to the Council's stormwater system. This should be verified as part of the geotechnical investigation in addition to the site classification and it can be demonstrated by a qualified civil engineer to the City's satisfaction that on site disposal is not feasible.



### General Question 3

Do you have any general comments about Amendment No. 61?

#### 4.3.6.3 Servicing Design

States "A waste management plan shall be prepared for each new development and submitted with the development application to ensure refuse collection can be undertaken in accordance with the requirements of the local government. Servicing and utilities elements should be screened from view or, if required to be on the outside of the building, should be integrated into the fabric of the building". It is essential that the developer comply with the Environmental Protection (Noise) Regulations 1997 when preparing a waste management plan and in particular the manner in which waste will be disposed and collected to ensure noise levels is kept below the required standard.

#### 5.1.2 Signalised Intersections

States Signalised intersections with pedestrian phases should be added or enhanced at the Mill Point Road/Labouchere Road and Judd Street, Mends Street and Mill Point Road, Richardson Street and Labouchere Road, and Angelo Street and Labouchere Road intersections in accordance with Plan 4.

Studies have shown that roundabouts are safer than signal-controlled intersections. Pedestrian crossings can be positioned in a location that will provide safe road crossing inclusive of pedestrian refuge in the centre of the road

Roundabouts reduced injury crashes by 75 percent at intersections where signals were previously used for traffic control, according to a study by the Insurance Institute for Highway Safety (IIHS). Studies by the Insurance Institute for Highway Safety and USA Federal Highway Administration have shown that roundabouts typically achieve a:

- 37 percent reduction in overall collisions

- 75 percent reduction in injury collisions

- 90 percent reduction in fatality collisions

- 40 percent reduction in pedestrian collisions

There are several reasons why roundabouts help reduce the likelihood and severity of collisions because of lower travel speeds, drivers do not attempt to beat the lights and one-way travel, which makes it easier to manage the traffic.

#### 5.2.3 South Perth Train Station

States "a Train station should be constructed at the location established within the Kwinana Freeway median, in line with long term strategic planning. Development opportunities within adjoining public land, and associated value capture potential should be investigated".

It is recommended that the new train station for South Perth should be integrated into the basement "Landmark Site" which is located between Mill Point Rd/ Labourchere/ Mends St, as this site will better service the district. The City should lobby the State Government to construct an underground train line from the Central Business District to the Landmark site, and continue up Labourchere road to Preston Street and reconnecting onto the freeway.

The draft Activity Centre proposal for a train station within the Kwinana Freeway median, will not provide adequate public transport for the district. It is too far away from the majority of residential properties and the freeway carriageway is already restricted for usable space.

#### 6.3.1 Key Issue: Site Availability and Development Capacity

States in part that "An industry accepted figure for undertaking modelling and forecasting is that 25% of strata subdivided buildings would develop between 2016 and 2051, corresponding proportionally to about 18.5% for the period covered by the ACP projections (2016-2041)"

On this basis the proposed Activity Centre Plan will have an "ad hoc" impact on the character of South Perth, with older buildings being set back and then newer developments being permitted to the property boundary. This will create a negative impact on the character and amenity of the precinct. An example is the newly constructed building on Labourchere Road/ Charles Street, which has been built to the property line and is completely out of character for the area, and overshadows the South Perth Zoo, no vegetation or landscaping buffer has been provided in the front of the building, whereas other developments have a landscape buffer.

### General Question 3

Do you have any general comments about Amendment No. 61?

#### 1. Population and Dwelling Growth Forecasts

These remain confusing and contradictory within the Documents. The Local Planning Strategy states it is a plan for the City for the next 10 to 15 years (2019 to 2029/2034?). The LPS references "Perth and Peel @ 3.5 million dwelling targets" (2031) as a part of the underpinning evidence base and also provides column graphs showing the "Historic and forecast number of dwellings within the City (1991 – 2041)" – a mixture of historic data and predictions. It is difficult to see exactly what time frame and which data directly references the Draft LPS.

In addition to the lack of clarity about the time frames and data being considered, there is insufficient convincing supporting documentation regarding the population/dwelling forecasts and demographic and economic trends informing the LPS, particularly from 2026 onwards. A robust data base should be able to provide clarity and consistency with respect to population and dwelling forecasts for the time frame of the Draft LPS, not varied data with multiple time frames, presented in different formats.

#### 2. Managed Growth Strategy

While the principle of the "Perth and Peel" framework that accommodates the majority of infill growth within activity centres, urban corridors and existing transport infrastructure, the contextual application of this principle to the specifics of the City of South Perth LPS, is highly questionable.

Strategy 4.1.1 Lists the activity centres and urban corridors where the Managed Growth Strategy will accommodate most of the City of South Perth's future population and housing growth. An examination of this list in conjunction with the R Code Map provided, the pie graph breaking down additional dwellings by managed growth areas and other written information, provides the startling information that the density of 75% of the City will remain unchanged by this LPS. Additionally, 56% of the predicted infill will occur in 3 of the 10 identified activity and centres with less than 10% occurring in areas outside of the 10 identified activity and urban centres.

While it is admirable to try to preserve the local character of 75% of South Perth by leaving it unchanged, one has to question the devastating impact of potentially poor quality infill as more and more population and dwellings are pushed into the already most densely populated 'activity centre' areas of South Perth.

It is also important to note that the Canning Bridge Activity Centre Plan is currently being reviewed and the South Perth Activity Centre Plan is still in draft form, so basing the LPS population and housing growth on these activity centres as if they exist and/or may continue to exist in their current/draft form is problematic.

### General Question 3

Do you have any general comments about Amendment No. 61?

It also appears (4.1.1) that growth targets for these 'activity areas' have been established and the current population and dwelling figures essentially 'back fill' to meet these growth targets. This 'back-to-front' planning makes it logically impossible to maintain the current amenity and character of 'activity centre' areas. The maintenance of character and amenity and the contextual suitability of infill should be the starting point for any Local Planning Strategy, not the objective to 'achieve a stated population and dwelling target'. Focussing intense growth in less than 25% of the City will potentially have significant, negative impacts and make it impossible to preserve the local character of these areas.

Beyond the activity centre areas, our members have identified concerns with proposed R Codes and transitions in other managed growth areas, including those surrounding Manning Road in Manning, Canavan Crescent in Como, Elizabeth Street in South Perth and Canning Highway in Kensington.

The definition of activity centres and urban corridors by the LPS is far too narrow. It is unrealistic and inequitable to plan for a significant increase in density impact on 25% of the City and virtually no density impact on 75% of the City. All residents and ratepayers enjoy the benefits of the City of South Perth's close to CBD and river (s) location and accept the need for some infill throughout the City in the next 15 years. While supporting the principle of managed growth strategies, the contextual application of this principle in South Perth, as outlined by this Local Planning Strategy is limited and inadequate.

none

As a property owner in the area which would be affect we see Amendment no.61 as a very positive step for people who would love to enjoy the benefits of this fantastic area. It is a great area with so much to offer but currently too few people are able to live here.

It is great to see some futuristic thinking toward planning. As much as people don't like things to change thats not reality The more people that can live close to the city cutting traffic etc the better. Definately in favour of Amendment no 61.

The City of South Perth must resist any and all attempts by developers to simply ADD MORE RESIDENTS, then pack up and leave with their carelessness and ill-gotten profits. The original ratepayers would then be left to pick up the pieces in terms of reduced amenity, inaccessible cafes and restaurants (overcrowded), and untenable traffic conditions. Development is welcome (such as the Mends St Piazza and Mall, etc), but development MUST include sensible height restrictions as well as ADDING and IMPROVING infrastrucure and amenity - NOT just adding thousands of additional residents all competing for the same roads, public space and entertainment. We think the entire concept of a railway station is a complete crock, arguably unnecessary and highly unlikely to ever see the light of day in our lifetimes. Adding a plethora of ultra high towers on the peninsula is not the answer due to the above. Finally, they will completely destroy the already eroded value of our homes here. We would certainly be open to join any class actions against those responsible for any wilful destruction of amenity and value on the peninsula. Thanks for the opportunity to comment.

### General Question 3

Do you have any general comments about Amendment No. 61?

The overdevelopment of South Perth - as outlined in this Amendment, is unacceptable and needs a total rethink. Building Heights/plot ratios are unacceptable and totally out of place in the built environment. To double the heights along Mill Point Road and the Esplanade is unacceptable. The concept of Towers need to be abandoned as they are totally out of place in South Perth. Whilst not against appropriate development, the concepts and limits that are outlined in this document are unacceptable and will result in the total over development of the area.

If the City wants to become a dormitory suburb of Perth and/or a parking lot for the city then it needs to stop talking about 'community' or a 'village atmosphere'. This amendment will inevitably destroy any sense of village or community. These are developed from a sense of ownership and commitment to an area/society. Towers and the Tier system will see developers come in, build inappropriately, for profit and walk away leaving the area with a transient rather than residential population. South Perth should strive to remain a suburb where people come to live permanently. It is a pity we don't see the area as the Left Bank of Perth and strive to capitalise on the natural beauty, the history and the low/medium rise, more human scale of the area.

No body is going to come to see high rise buildings - they are more likely to come to get away from them.

It would be good to have a more comprehensive evaluation or information on the economic outcome that will be derived from these amendments. I'm particularly interested in how the amendment can improve employment opportunities given unemployment, particularly for our youth, is Increasing. I would also be keen to see more detail with regards to possible tourism opportunities which brings a significant economic benefit to the city and again provides increased opportunities for employment. The current state government is seeking opportunities for industry diverse of Ucation with tourism as a primary focus area. I think it would be appealing from both a local and state perspective do you have a strong focus on tourism which not only will have a positive benefit for the city that could potentially attract increase state funding to deliver on election outcomes. This state government is particularly keen on opportunities that addresses the "Our priorities" commitments and so an alignment with those our priorities I feel would be very beneficial to attracting broader State support (and funding contributions).

Very serious concerns about the proposed Building Controls - Building Height and Plot Ratio (particularly in areas of the Mill Point Character Area), Podiums, Street Setbacks and Towers. This is correctly identified as a unique and desirable area - changing it to one of high rise up to 27 storeys, allowing podiums and minimising setbacks will not preserve the highly valued amenity described in Part 1 of the ACP. Additionally, as this area is geographically constrained and environmentally sensitive it is highly likely that development on this scale would be disastrous. The Building Height area north of Ferrry St along Mill Point Rd must be a maximum of Low-Medium, plot ratio of 2.8 and setbacks of at least 6 metres, if this area is to be truly recognised as unique and valuable.

I approve of Amendment no 61

### General Question 3

Do you have any general comments about Amendment No. 61?

Amendment No 61 is a plan designed to totally and permanently destroy what was once a wonderful area. The Mayor started the problem by trying to flex muscle with the State Government about the train. The train was her own personal wish - not reflected by the residents and ratepayers. Vehicle congestion, noise and air pollution are ALREADY huge problems. I live on Mill Pt Road so I hear it and see it and smell it and am inconvenienced by it every day. By concentrating all the development in one area it only exacerbates the existing and future problems. Low level developments should be dotted around the South Perth, Como, etc. This allows for vehicles to be able to go off in all different directions. On Labouchere Rd and Mill Pt Road there is only one place for the vehicles to go - and that is directly into the open throbbing sore that already exists. It makes no sense. John McGrath tells me he is in favour of the Amendment so that it "saves the rest of the suburb from development". How nice of him to sacrifice all the people currently living in the affected areas. We are ratepayers and residents as well - why are we ignored in the whole process? Why is there no mention in the Amendment as to impact on current residents? Why is our in depth knowledge of what is currently happening ignored? What compensation is going to be paid to us so we can leave the area and buy elsewhere? What level of compensation will developers be paying to existing ratepayers and residents to mitigate noise and air pollution? Why is the State Government not being challenged? It can't just say "we want this" but refuse to provide the necessary infrastructure to mitigate the impact. Come on. If the State Government told South Perth that it had to have a nuclear plant on Mends Street would the City of South Perth just go along with it? Infrastructure first and then we look at development. Simple. Residents have asked the City of South Perth for certain information which it has refused to give. The Councillors are gagged. The Local State member is looking at this from a totally blinkered "not in my backyard" perspective - he doesn't want any of this affecting the street he lives in. The Federal member is AWOL now the election is over and probably wouldn't say anything because of his wife. Who is looking after the interests of the ratepayers and residents - particularly those currently living in the target zones? I refer the City once again to clause 3.5 of its own "Governance Framework".

Generally I am happy with the proposals as they relate to the Richardson, Mend Street and Hillside Areas but:

(1) I strongly object to any proposals that leads to an increase in height over what has currently been built in the Mill Point Area; and

(2) I would prefer building heights north of the Judd Street alignment up to Ferry Street remain at the heights currently existing in the Mill Point Area (ie the "High height type" should be reduced to provide for a height conforming to existing building heights in the Mill Point Area ).

I do not support the building of a South Perth train station in the proposed location or any where between Elizabeth Quay and Canning Bridge.

The height figures for buildings on the foreshore should be the same and not higher on either side of Harper Terrace.

My concern is that in the documents provided, the guiding principles of the ACP overwhelms the building controls specified within amendment 61. So, from a public perspective, the focus is on the glossy 'feelgood' statements of the ACP rather than the reality of the planning outcomes that will result from amendment 61 being applied.

### General Question 3

Do you have any general comments about Amendment No. 61?

Built form is being controlled by height, setbacks, podium and tower site coverage and plot ratio. Too many controls will hinder innovation and creativity.

Introducing plot ratio limits may encourage applicants to compress apartment and store sizes. This is at odds with SPP 7.3 that promotes larger external storage for apartments.

AMD 61 plot ratio provisions will encourage applicants to locate car parking and residential stores below ground. The precinct is not particularly suited to deeper basements as explained above. The minimum non-residential plot ratio (1.0 or 30% of total) does not align particularly well with the base plot ratios of some of the smaller sites in the Richardson Precinct when a base scheme is proposed.

The 12% of site area for deep soil zone required in the ACP will reduce the efficient of basement carparking design which encourages carpark to be included in podium or reduce development potential.

- All sites previously within the AMD 46 Special Design Area should be included within the highest building height limit with Tier 2 potential.

- There should be no height caps for sites within the 'Tier 2' boundary. Building heights will be determined by the plot ratio controls.

- There are too many planning controls that will inhibit innovative and diverse designs.

- Building height provisions should refer to number of storeys only. This allows greater flexibility in design and higher apartment ceilings.

- Building heights are inconsistently mapped along The Esplanade. Medium-high zoning is not appropriate to achieve a reasonable tiering.

- We don't believe it's reasonable to relax building height limits from AMD46 along the South Perth Esplanade.

General intent with more granular requirements is supported.

Controls are too onerous and should be simplified.

More testing and professional feedback required.

Surprised at the increased special design area. This increase could be allowed for in a future scheme.

Built form is being controlled by height, setbacks, podium and tower site coverage and plot ratio. Too many controls will hinder innovation and creativity. The control does not factored in the capability of the City's infrastructure. For example, AMD 61 encourages basement parking but the City's geotechnical condition and stormwater infrastructure cannot support basement construction in a cost effective manner. There are a lot of discrepancy between the ACP and AMD 61 causing confusion. The plot ratio set in AMD 61 does not align with the setback or building height control. That is, the plot ratio even in base scheme cannot be achieved after taken into account of setback and building footprint control. It significantly reduce development potential. The flipping of the height from the special control area to the centralized location is not supported.

When planning a strategic vision and planning requirement for this particular development area that stretches from the tip of South Perth Peninsula to Richardson Park and the Perth zoo it covers many requirements from domestic to commercial. i believe your draft does not show this diversification of land use requirements. i do not support amendment no. 61 because the setback of this proposal have been reduced to 0 at back of lots in the mends area facing the Esplanade. together with 0 on the side of these lots. this detracts from the residential aspect of these lots facing the City. i urge you to use the setback that are currently in use under town planning scheme no. 6. i have no problem for commercial lots having the 0 setbacks both sides and rear.

There are too many controls which is hampering progress and development. heights, plot ratio and site coverage are too limiting and affecting positive design outcomes.

I would like to see more certainty for developers around what can and can't be done. There are too many great sites, with money to be spent simply sitting idle. Great to see the density in the Mill Point precinct.



**General Question 3**

Do you have any general comments about Amendment No. 61?

Far too many development controls is hampering progress. Plot ratio and site coverage along with building heights should be increased.

Less restrictions on development controls

It is too prescriptive. Traditional plot ratio and site coverage will deliver better outcome.



## Local Planning Policy

Please provide your feedback below on draft Local Planning Policy P321: South Perth Activity Centre Competitive Design Policy.

The intention is laudable - to provide a best design, but  
In what democracy should a landowner be told what he puts on his land  
The only issues we have faced is the inability of the DAC, and now DRP to judge quality appropriately - mostly because they omit things like context.  
BUT since the WAPC have finally recognised the lack of ability of local government to assess designs appropriately, they have announced a DRP which will replace them. This should obviate the need for this policy.  
If the policy survives, it is important that ALL aspects of the quality of a building are assessed in the competitive process - including context and sustainability.

Competitive Design Policy gives scope for manipulation.  
There should not be any opportunity or suggestion of allowance for building applications outside the stipulated building height/plot ratios set by the City.  
Who decides what is 'exemplary' or 'excellent' in design? Buildings allowed - Civic Heart included - that are outside the stipulated limits do not give any cause for confidence.  
ANY building needs to fit into the streetscape/landscape.

I am not qualified to speak on design, etc. Only to say that "how can we trust the City of South Perth to get the plans for a whole suburb correct when they couldn't even get the design of the pavilion on Ernest Johnson Oval right"? Bad enough that an architect put forward flawed plans - but SOMEONE IN THE CITY SIGNED OFF ON THEM. The deficiencies of that building were obvious to everyone else.

Generally, the proposed Policy P321 appears to be a good idea. How it works in practice will in part depend on the make up of the Panel.

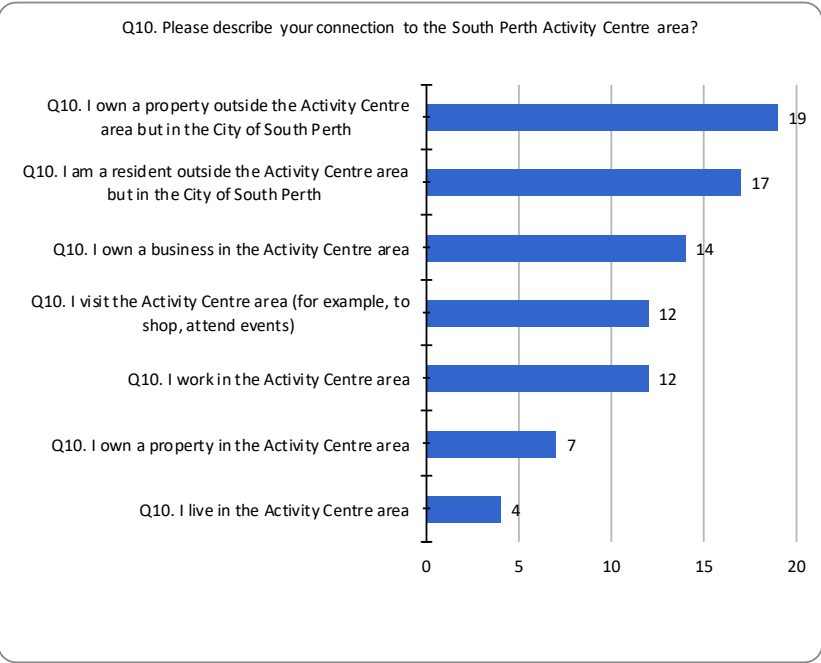
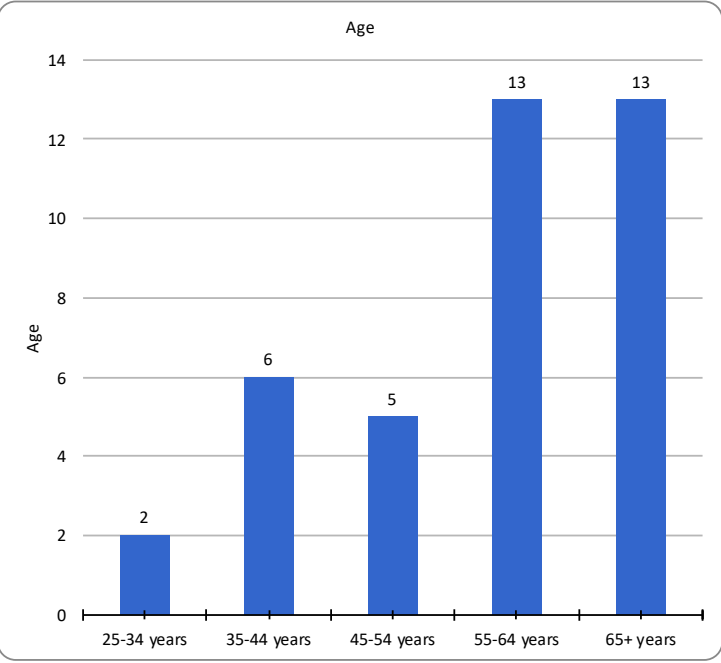
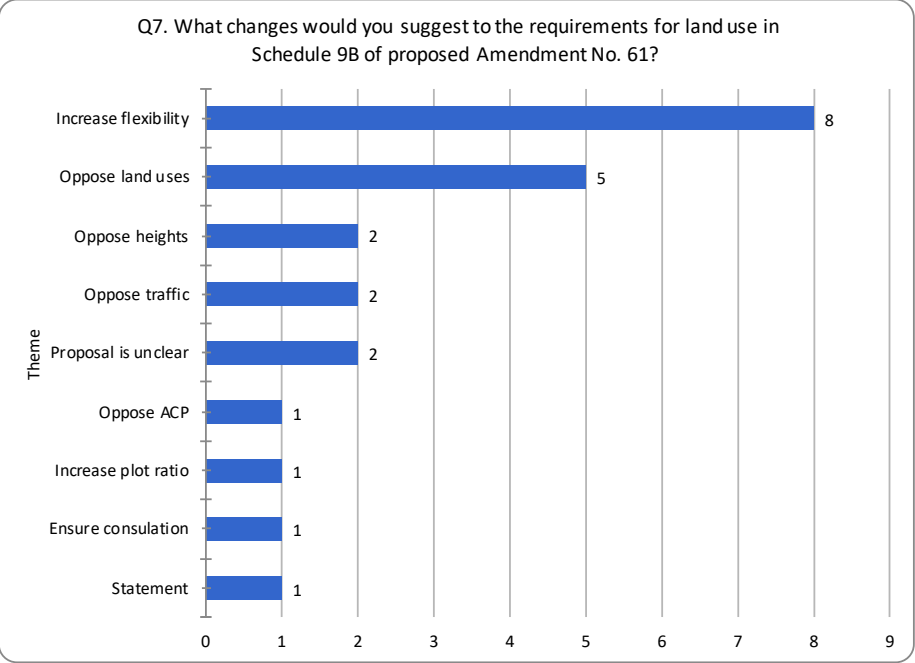
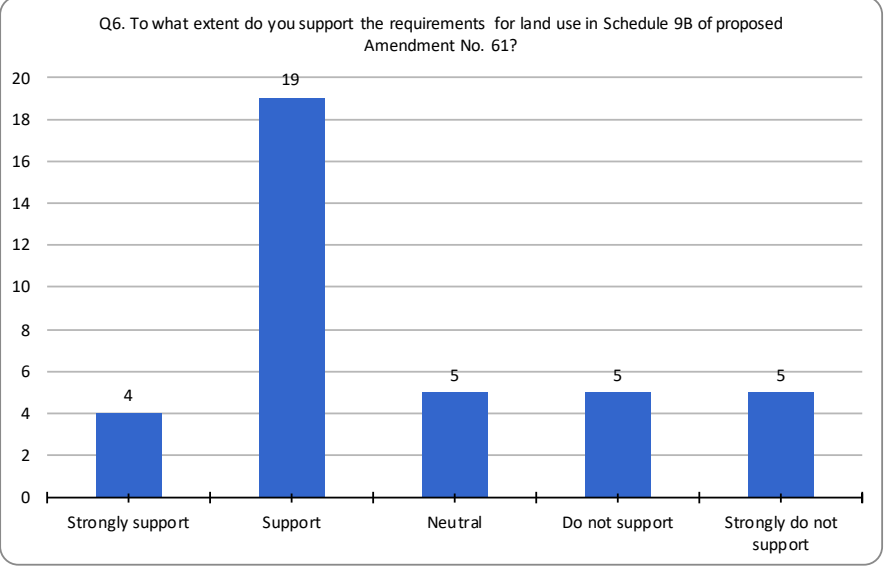
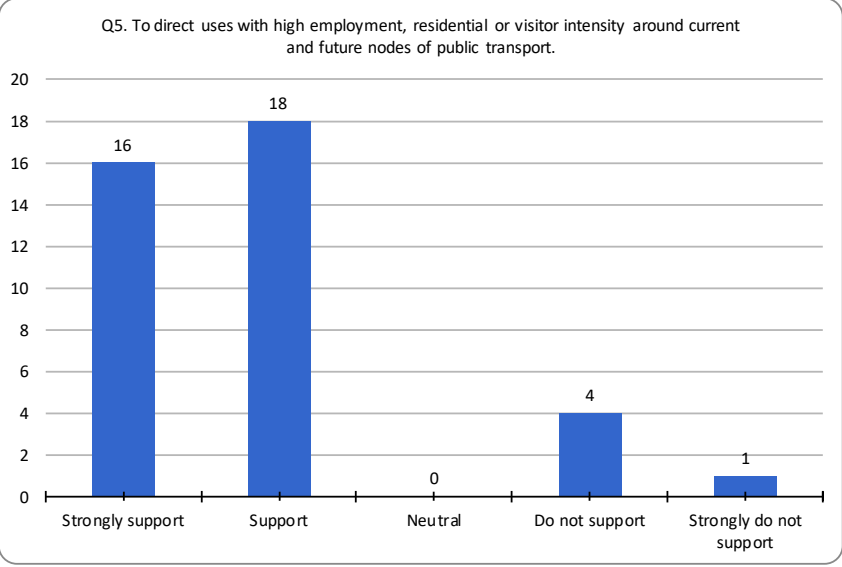
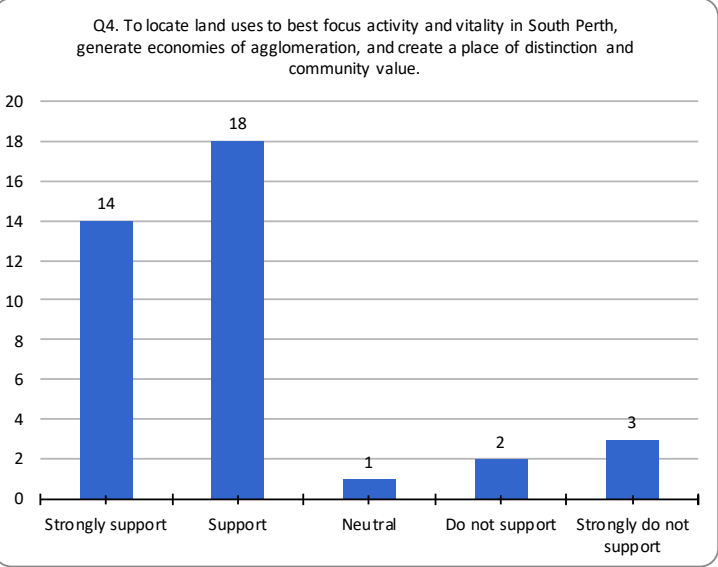
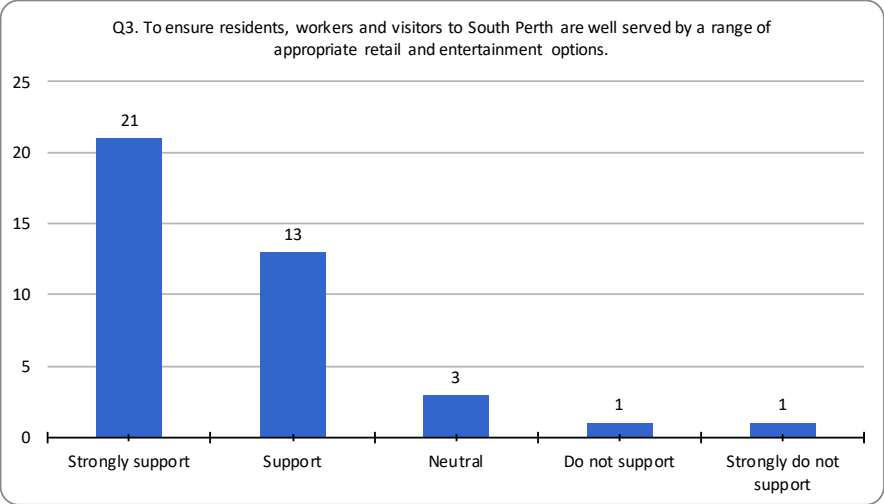
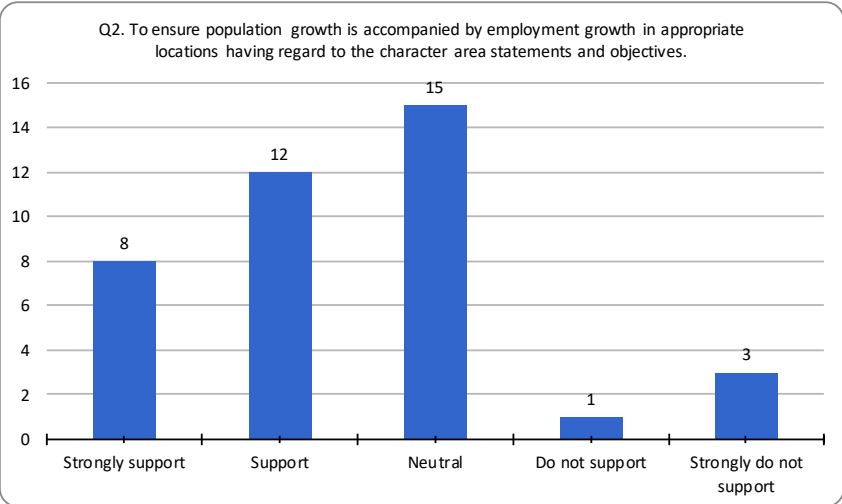
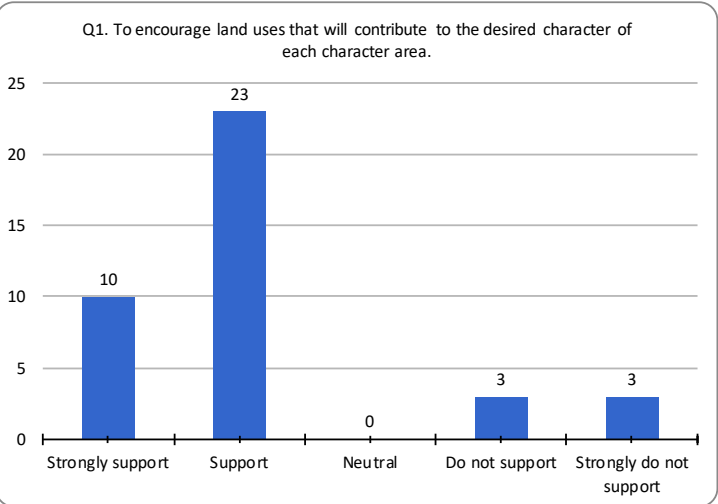
This policy is unfair and an unreasonable imposition on the private sector.  
Design quality should be determined by a DRC. This policy requires developers to hand over their IP which may or may not be effectively duplicated.  
Entirely unfair, resulting in poor development outcomes.

This policy is strongly not supported.  
To mandate design competition for any Tier 2 proposals is likely to be onerous and costly for applicants. It is considered unreasonable for a select Design Review Panel to dictate building designs throughout an entire precinct. Such a system will likely deter proposals in Tier 2, increasing the amount of shorter, bulkier designs. It will likely cause controversy and tension in the local design profession.  
It's only considered reasonable to conduct design competitions on large public sites. It is unfair to impose competitions to this extent for private enterprise as it will stifle development and higher density applications. This in turn will restrict the capacity for the City to develop and suppress the local economy which is contrary to State Government policy.

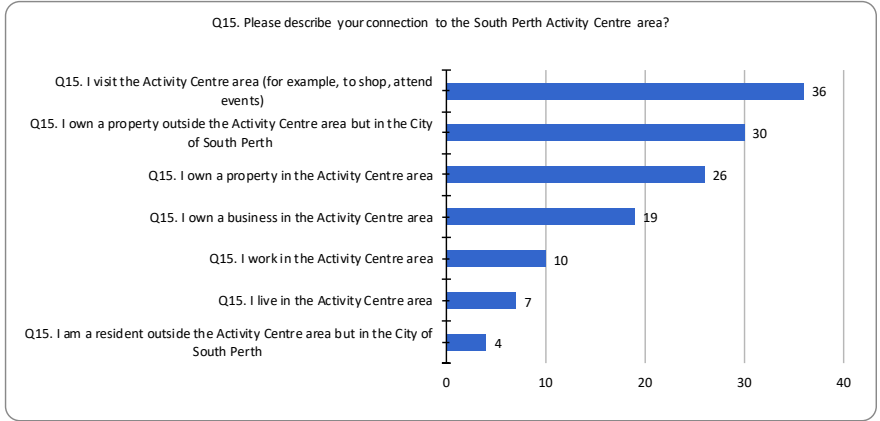
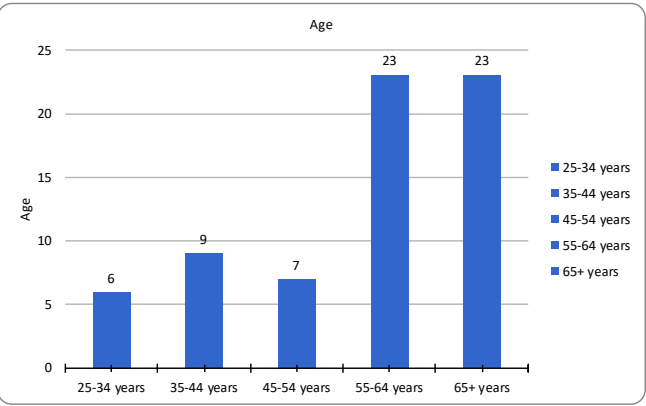
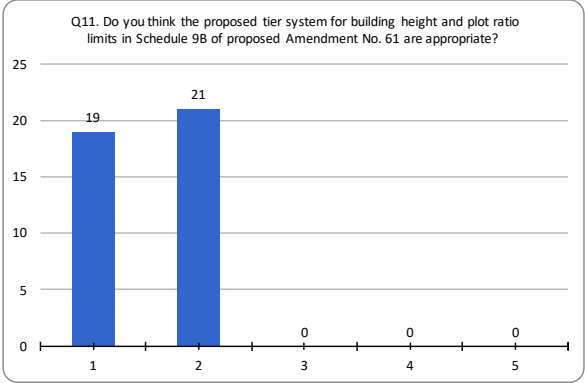
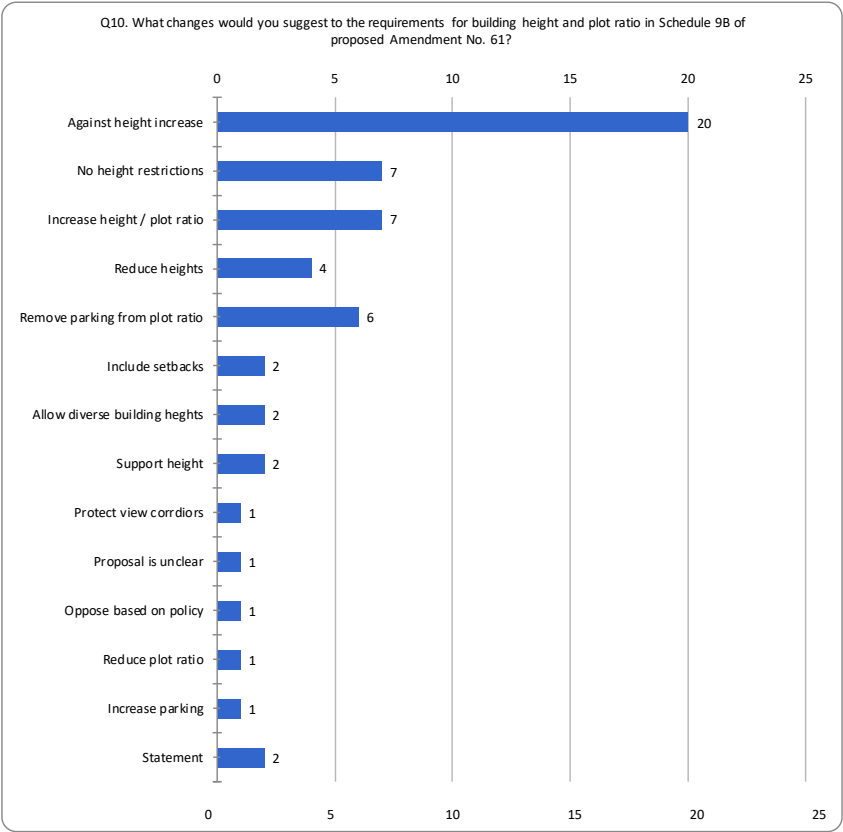
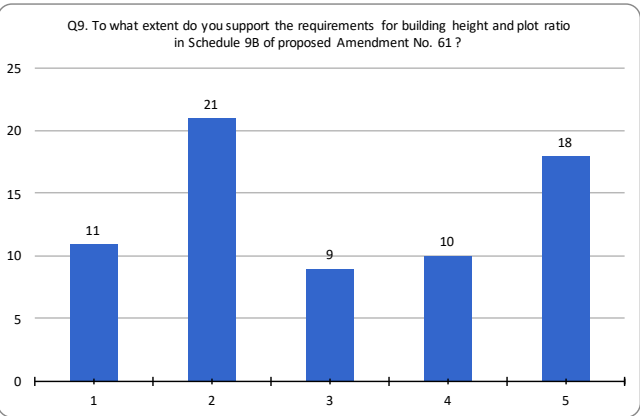
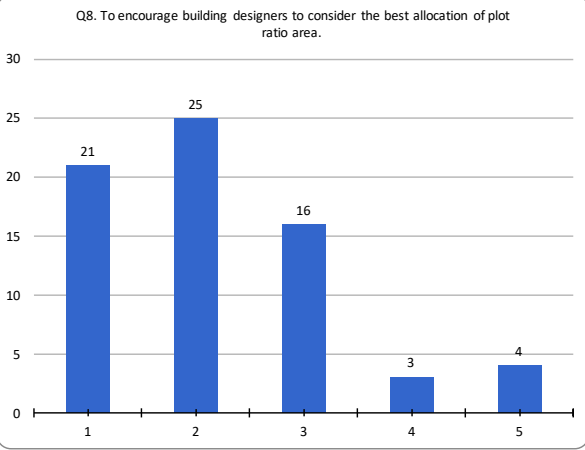
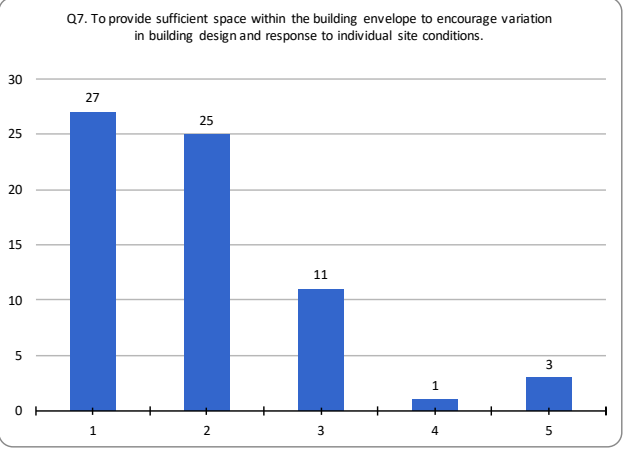
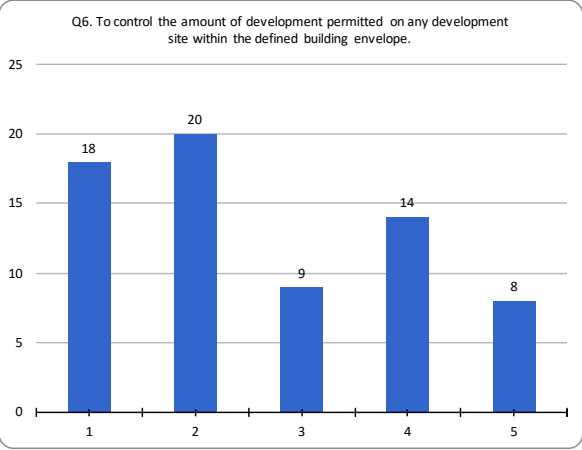
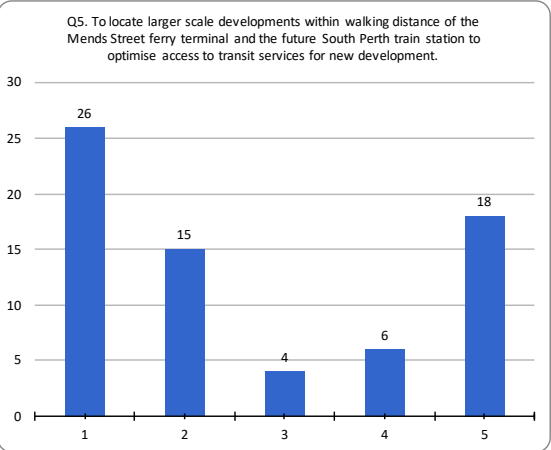
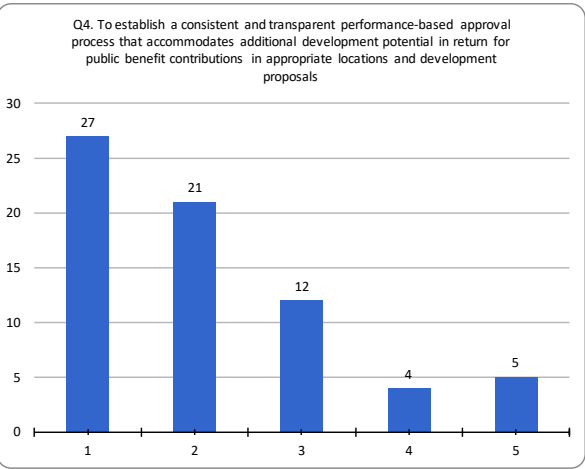
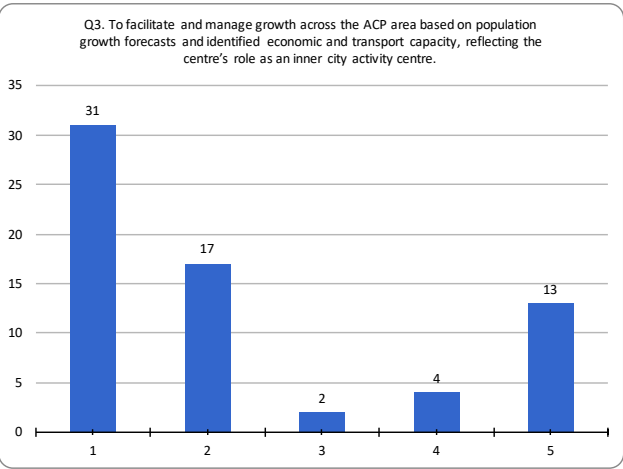
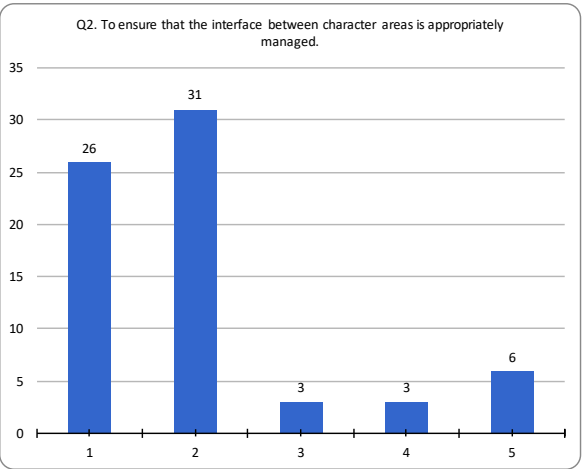
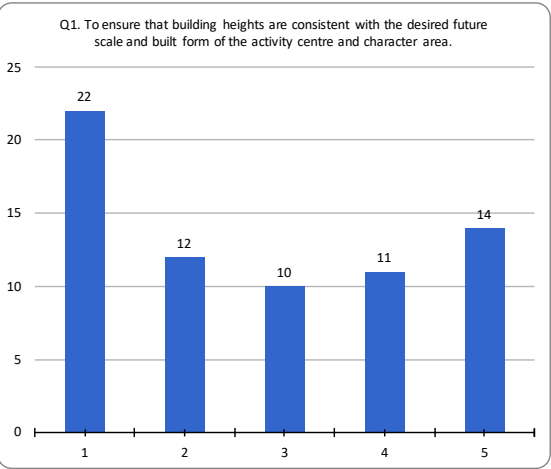
# Appendix C

## Feedback Form Graphs

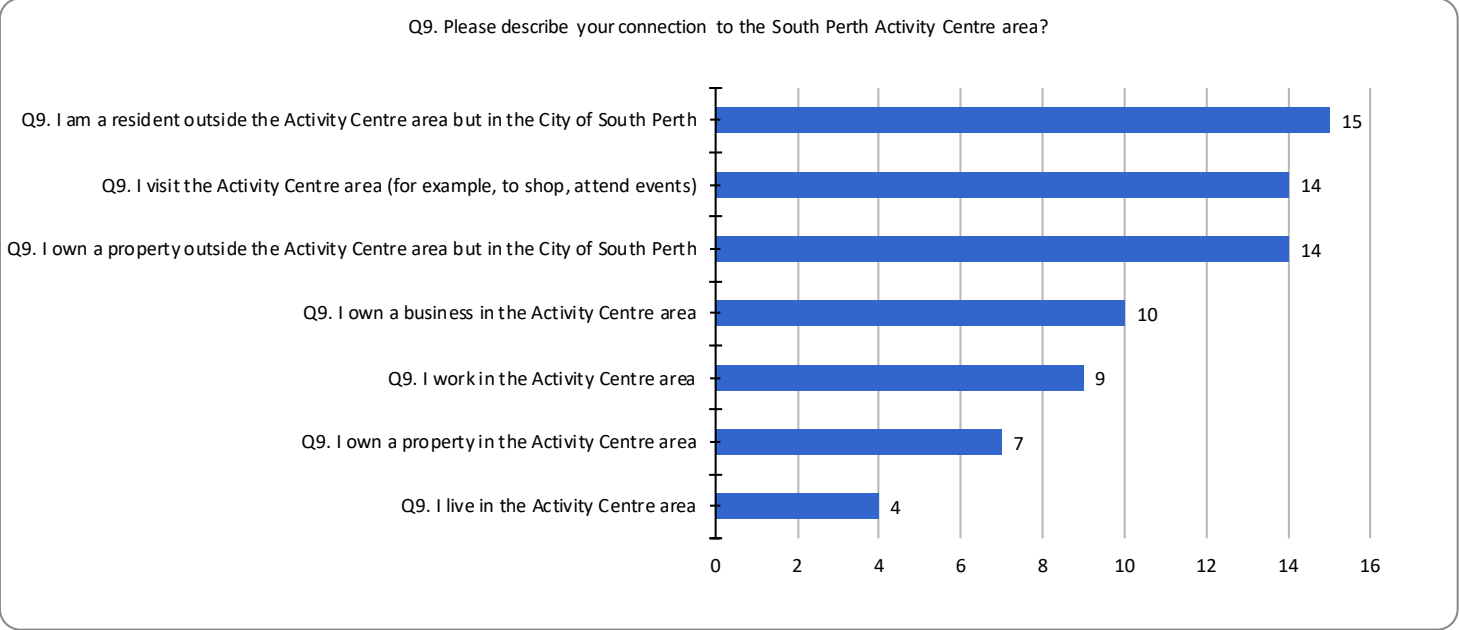
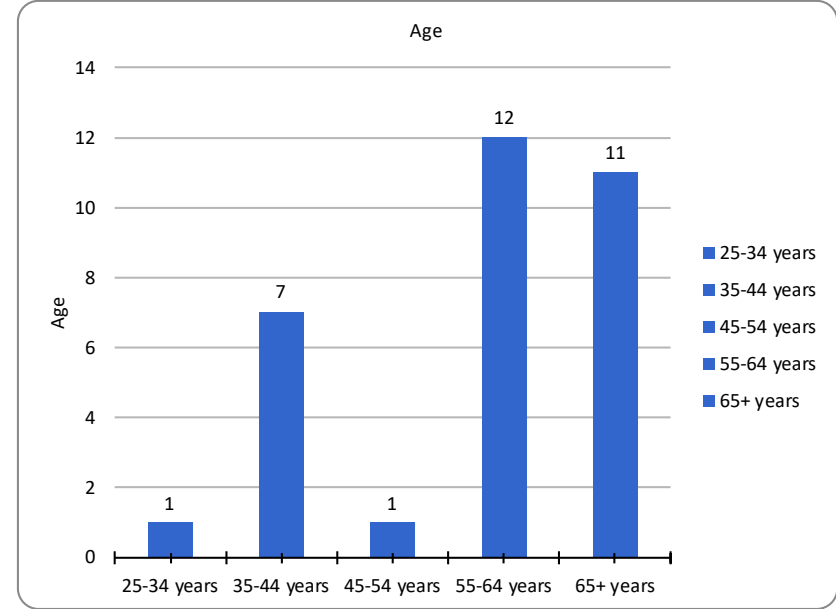
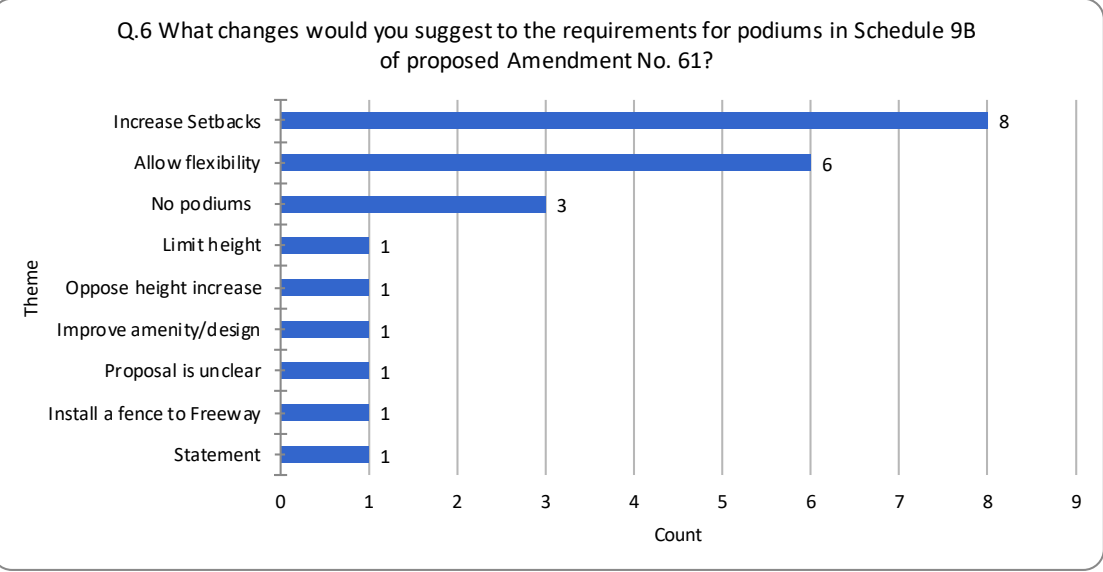
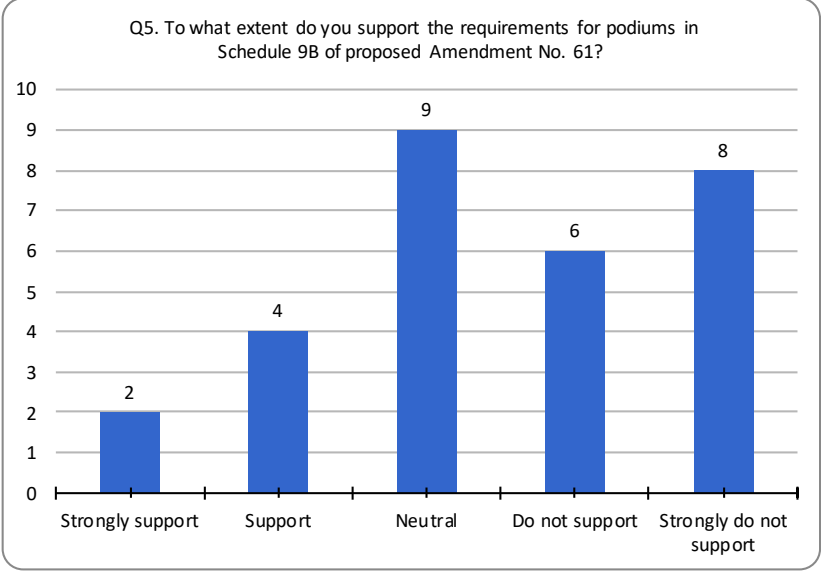
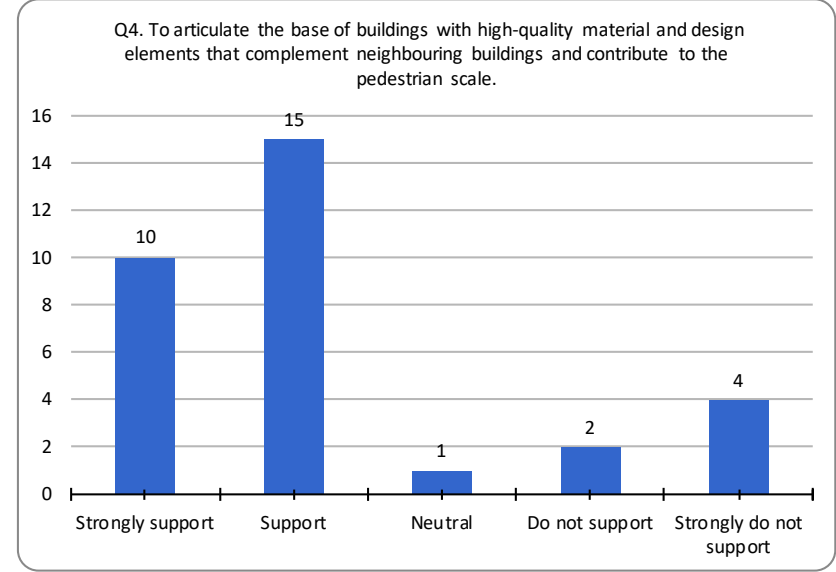
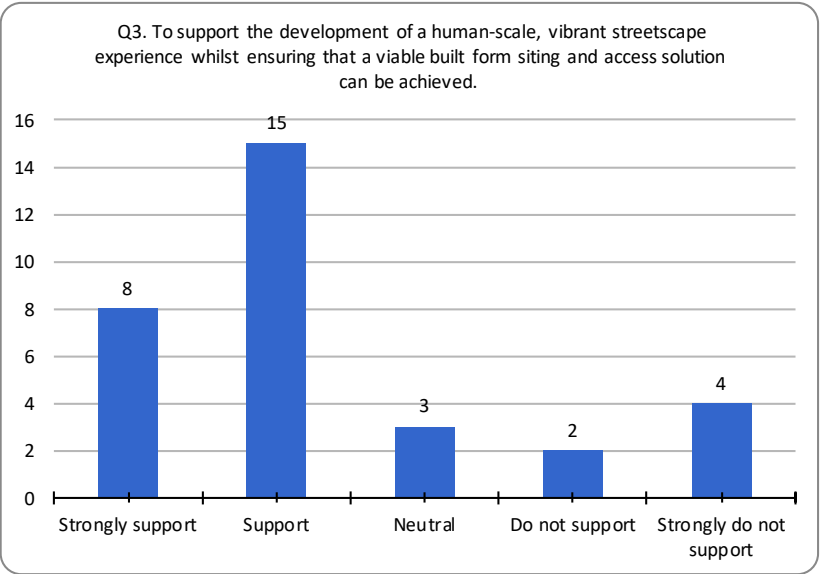
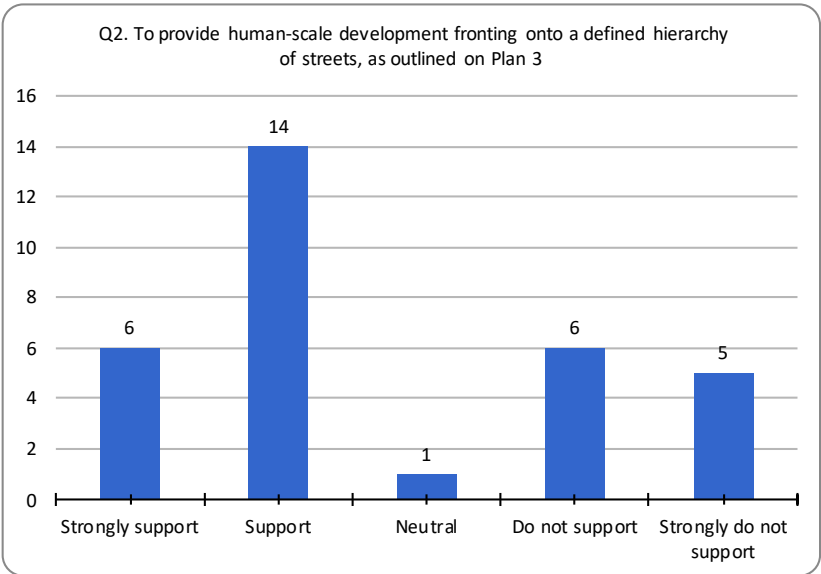
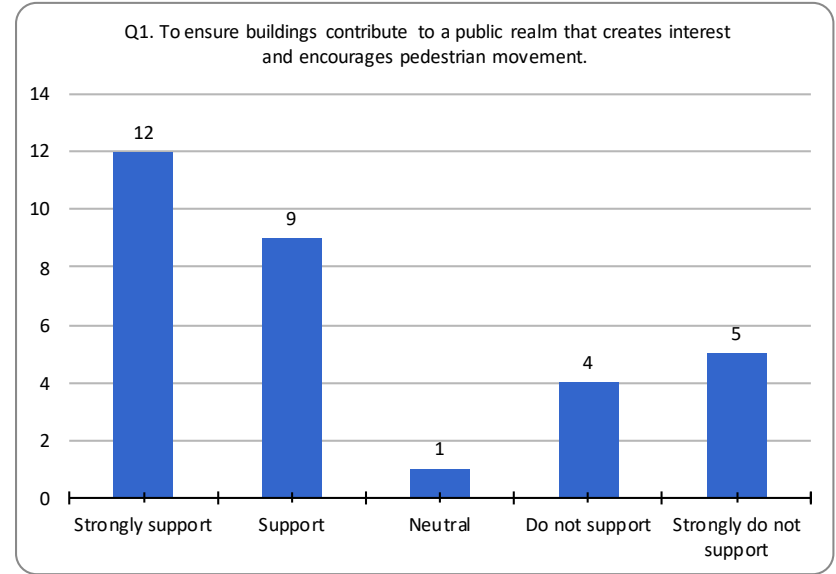
Land Use



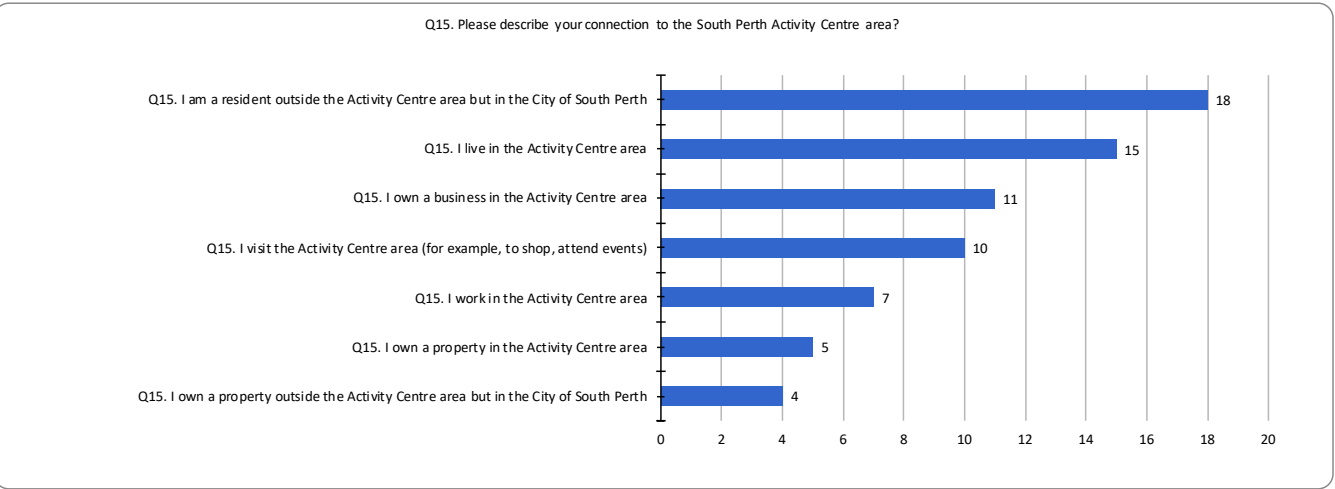
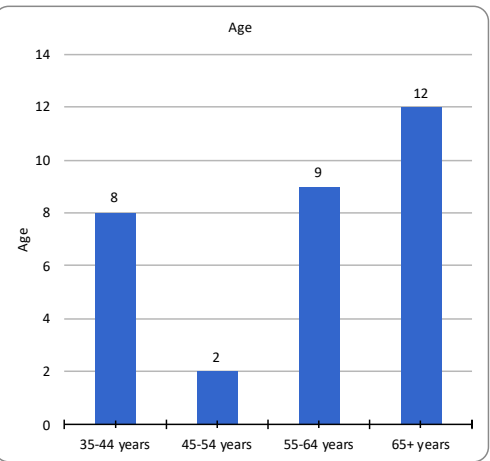
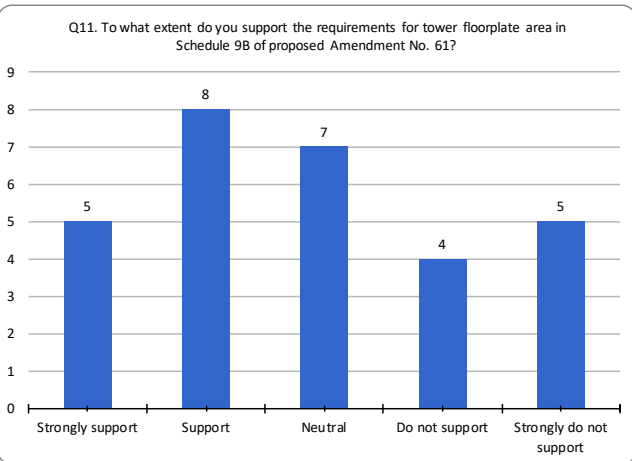
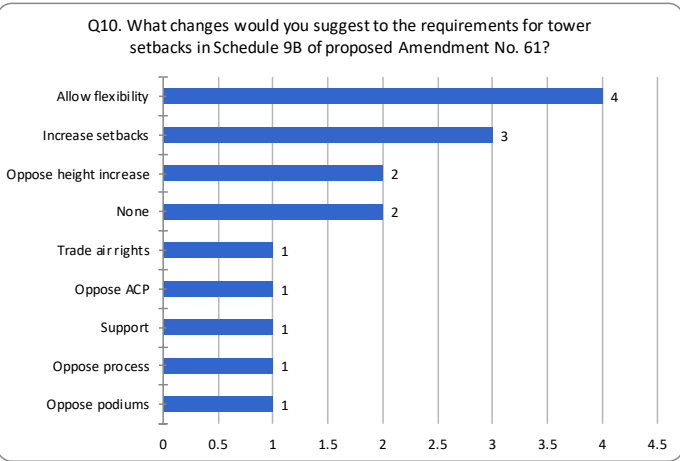
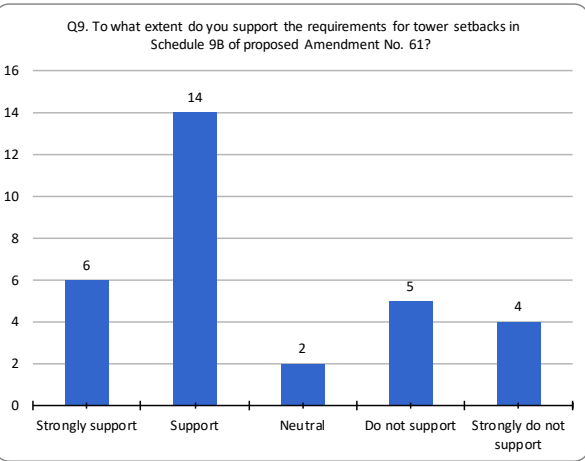
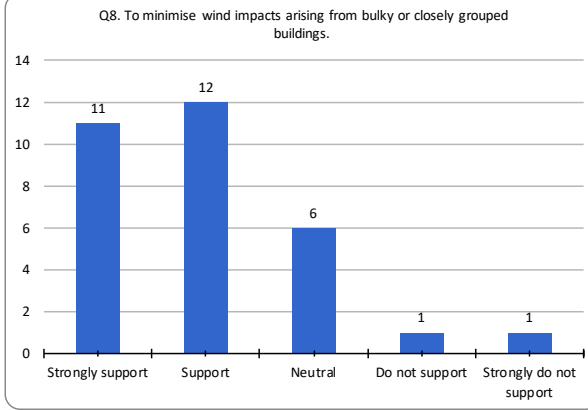
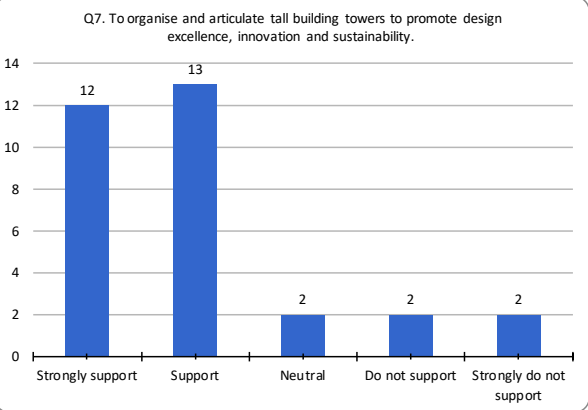
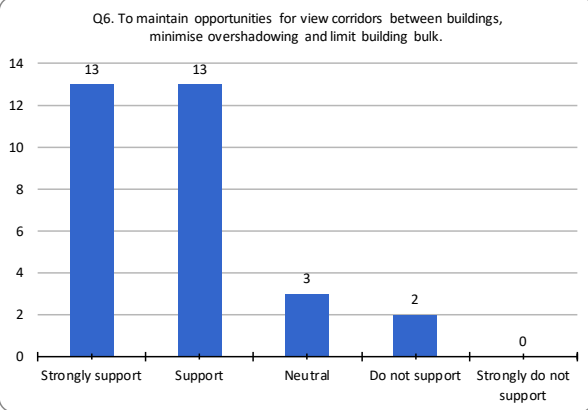
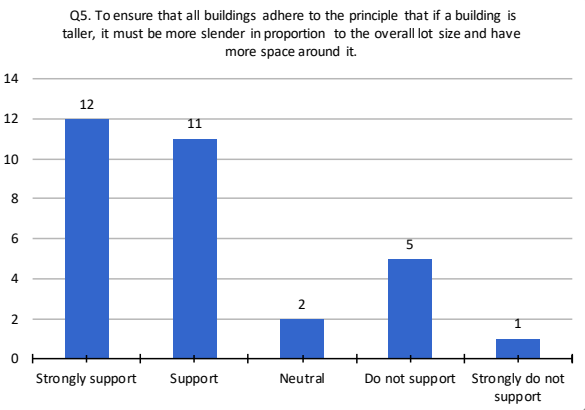
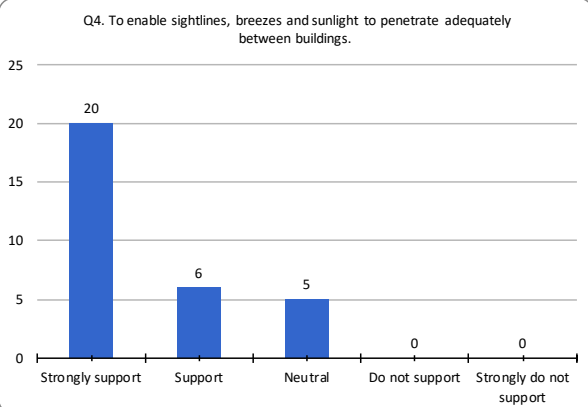
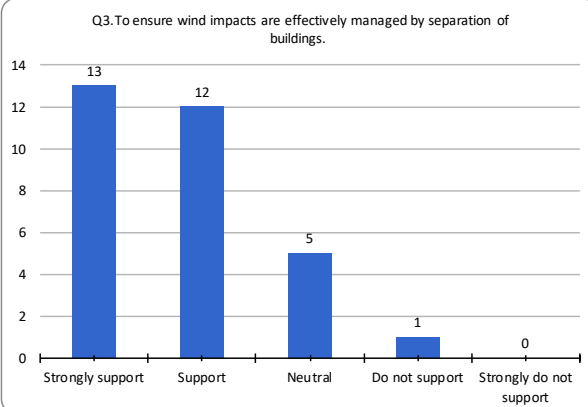
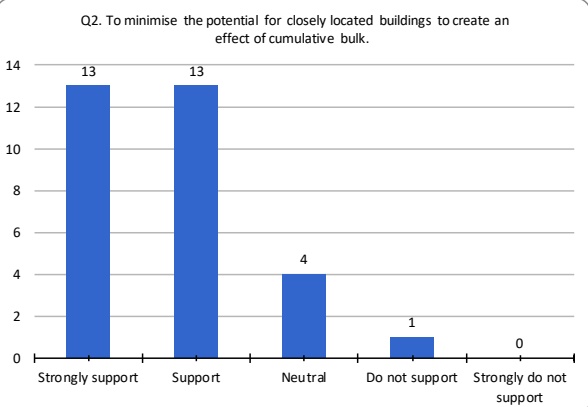
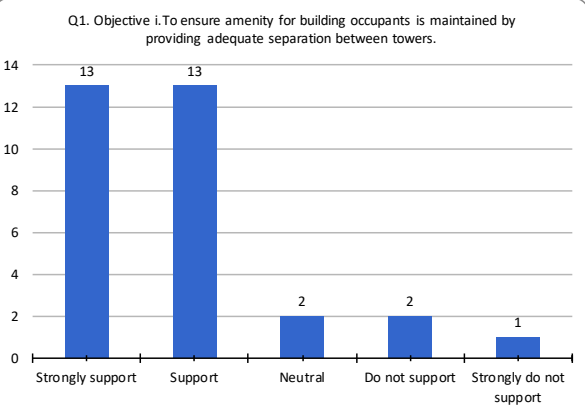
Building Size Height & Plot Ratio



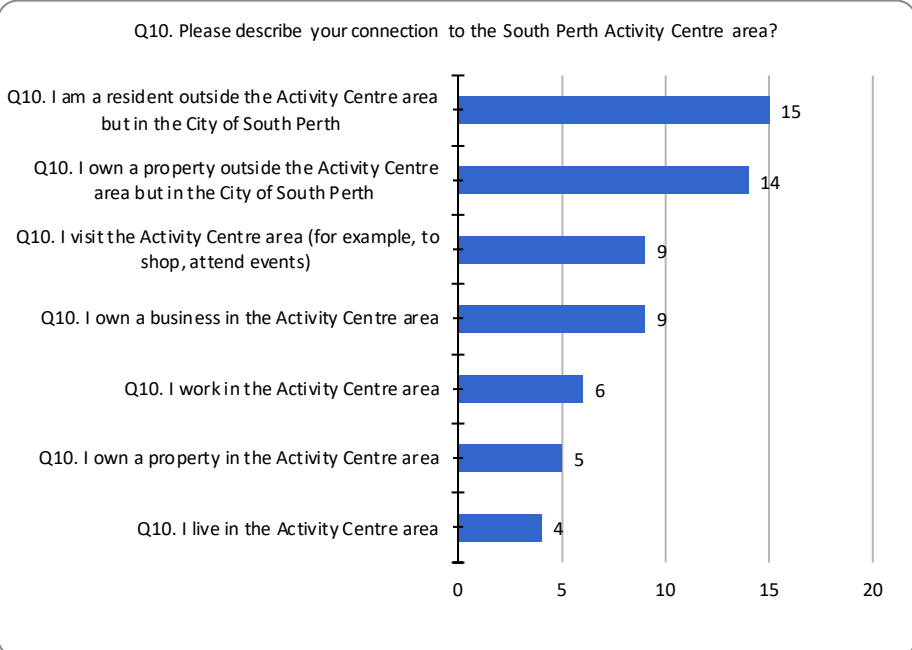
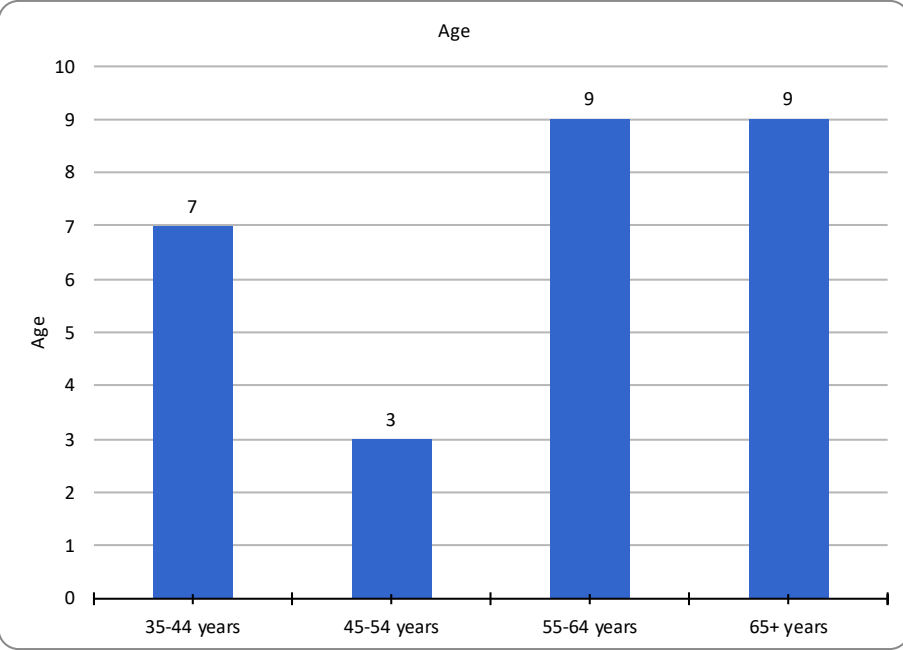
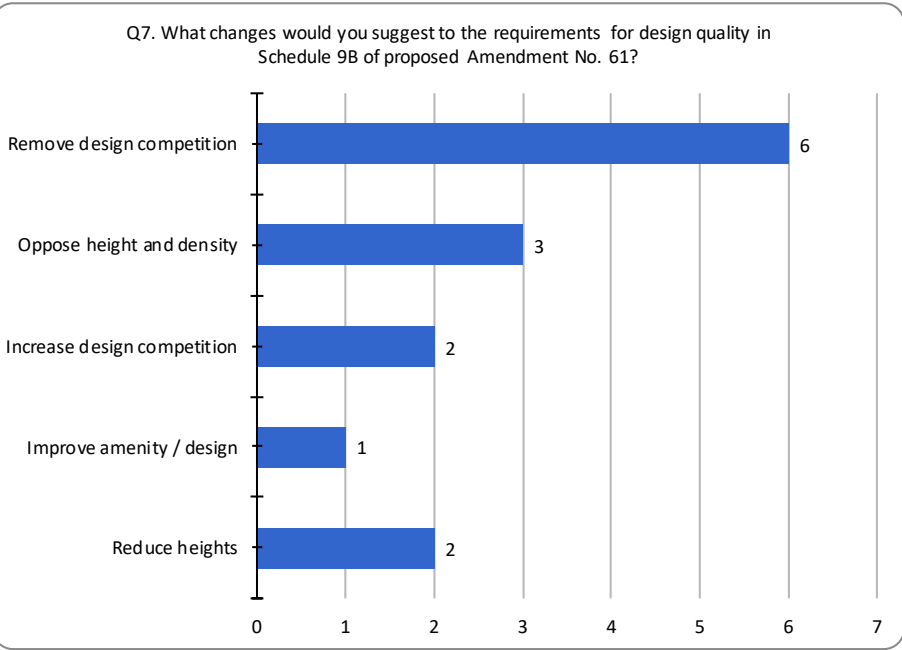
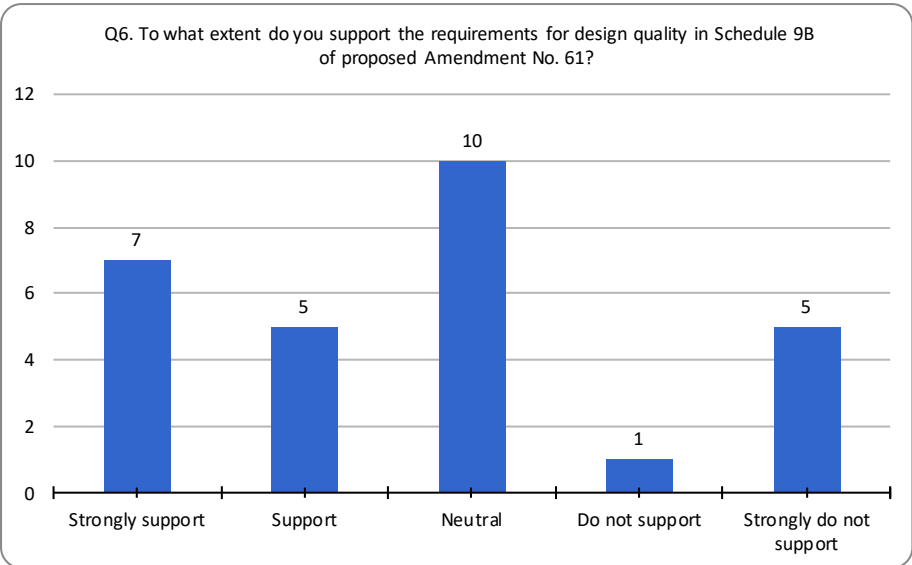
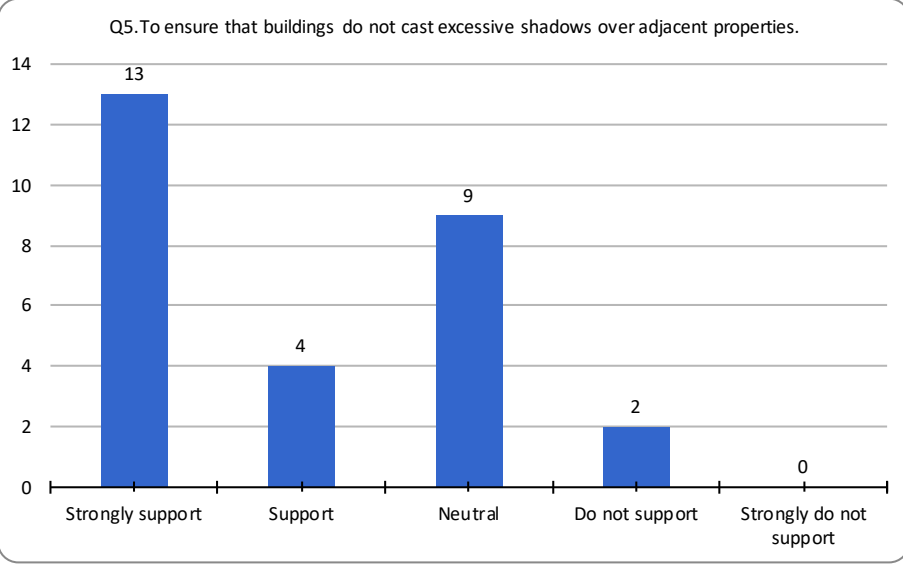
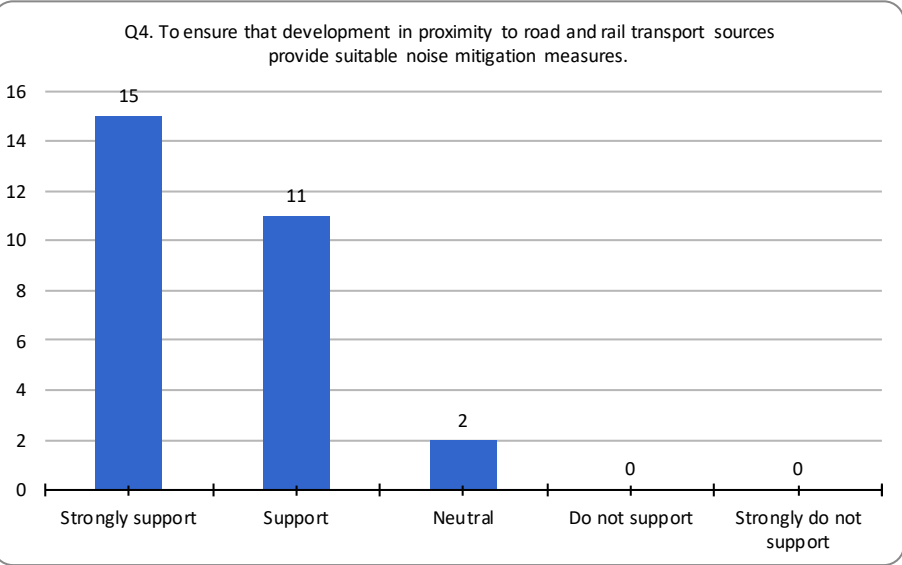
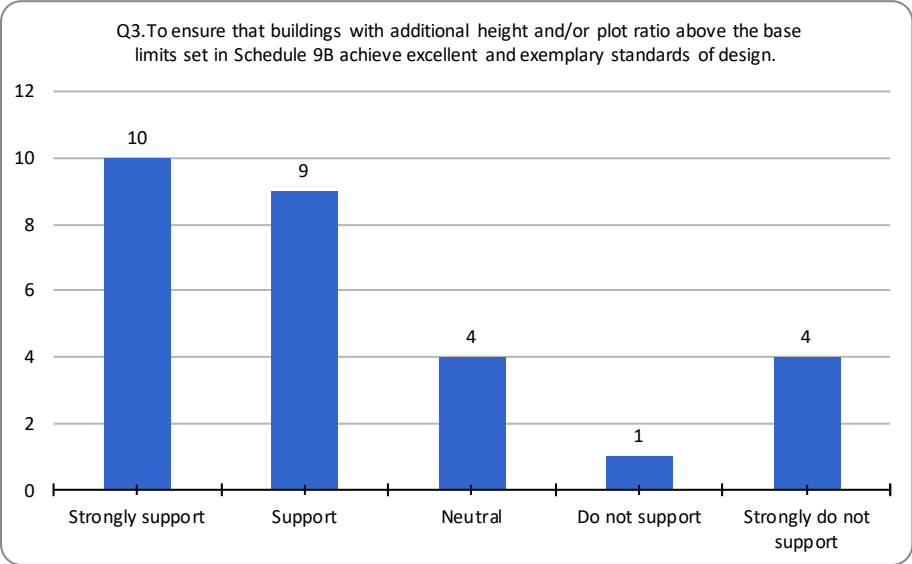
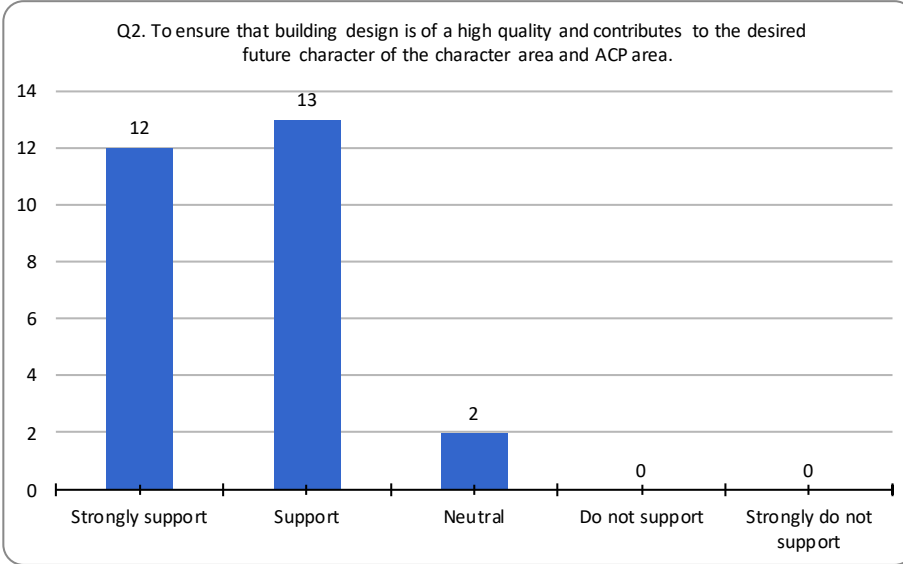
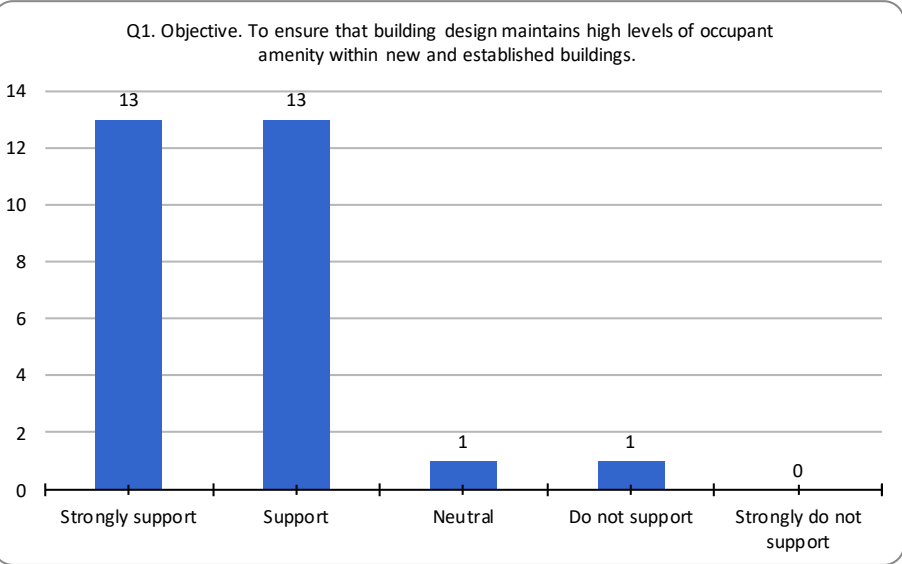
Podium Feedback



Towers Feedback

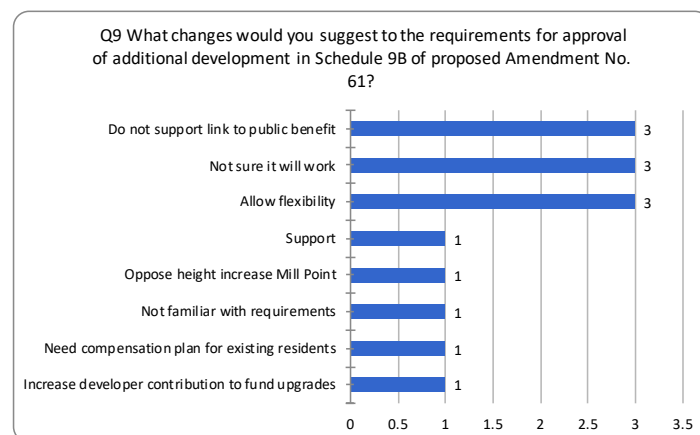
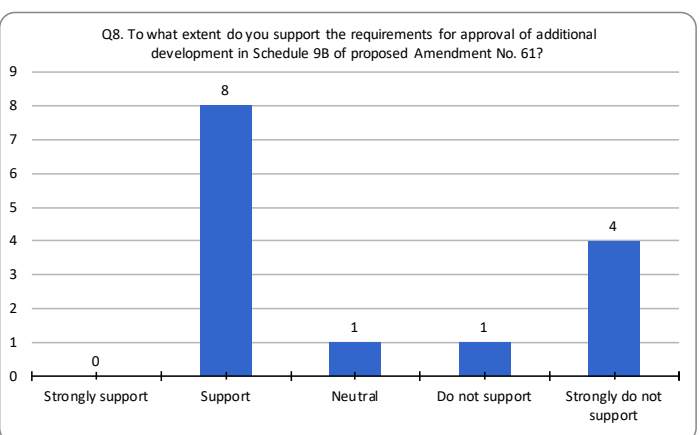
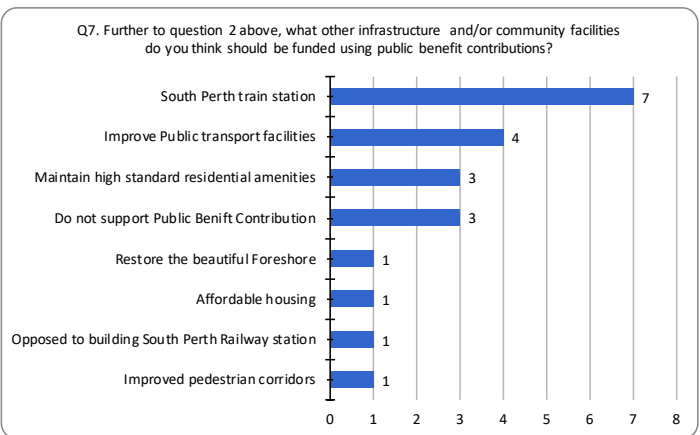
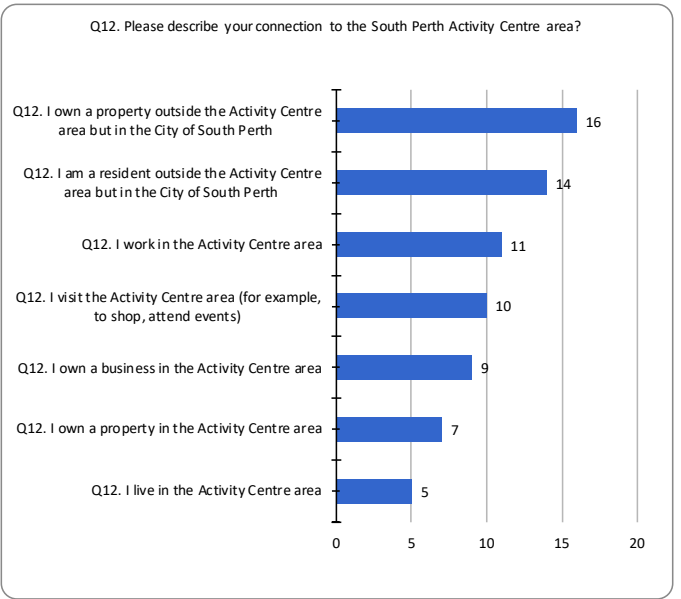
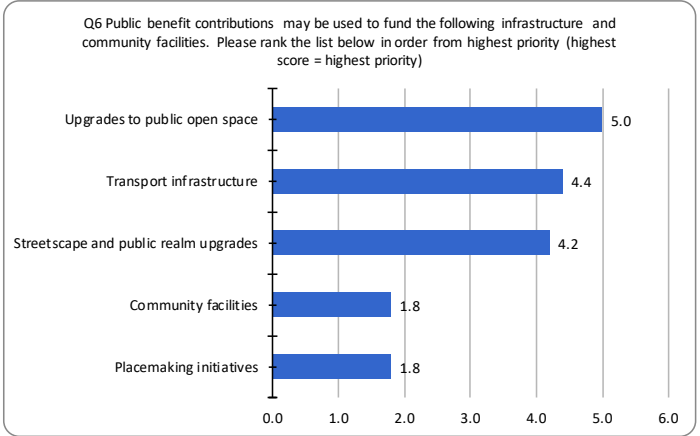
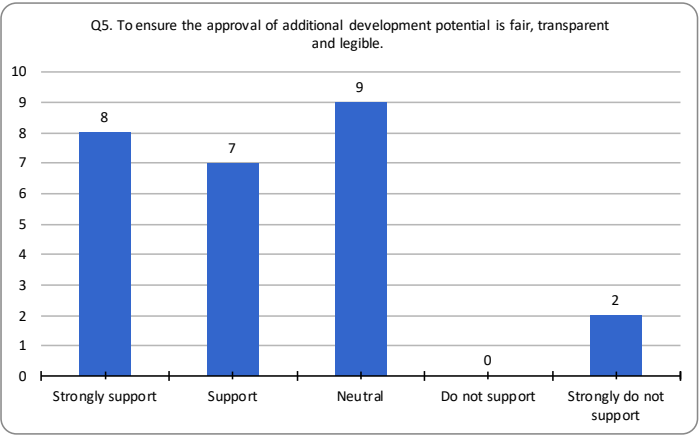
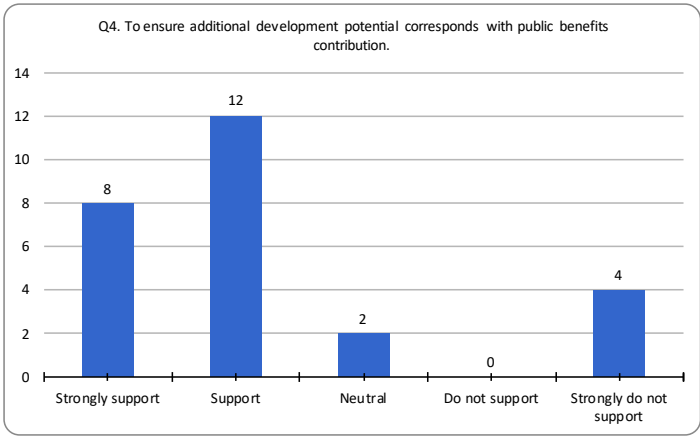
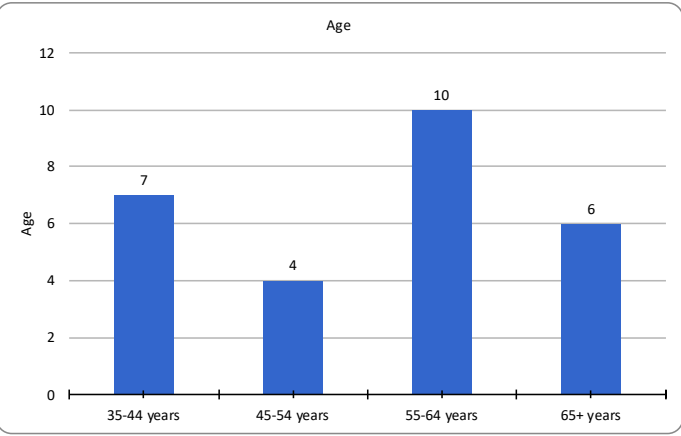
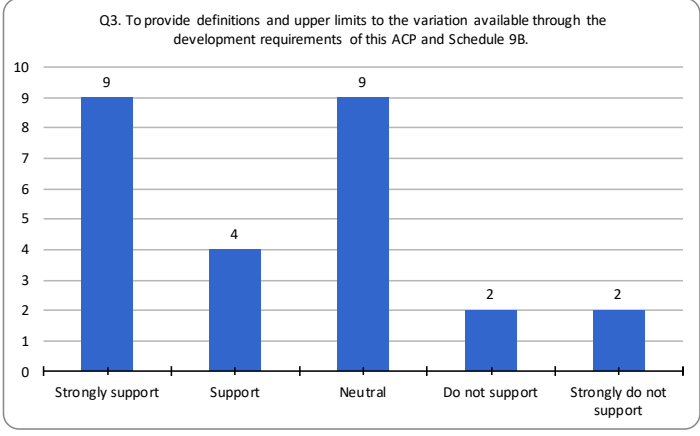
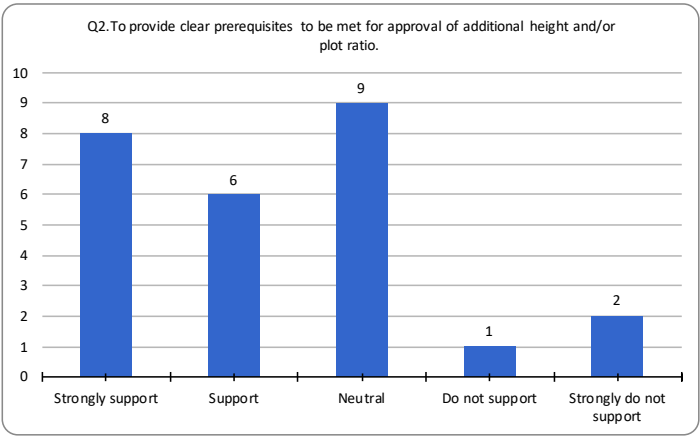
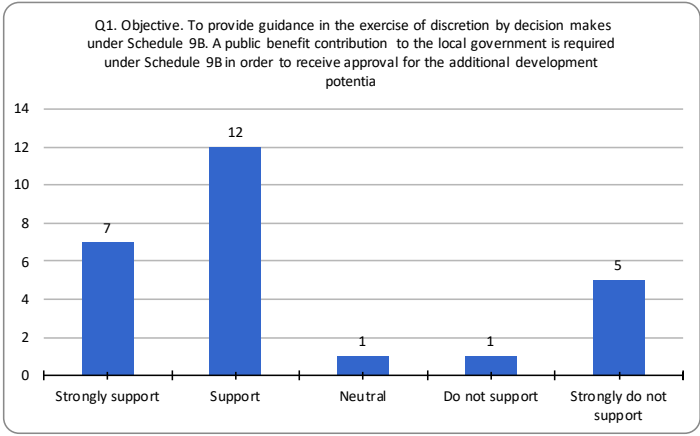


Design Quality Feedback

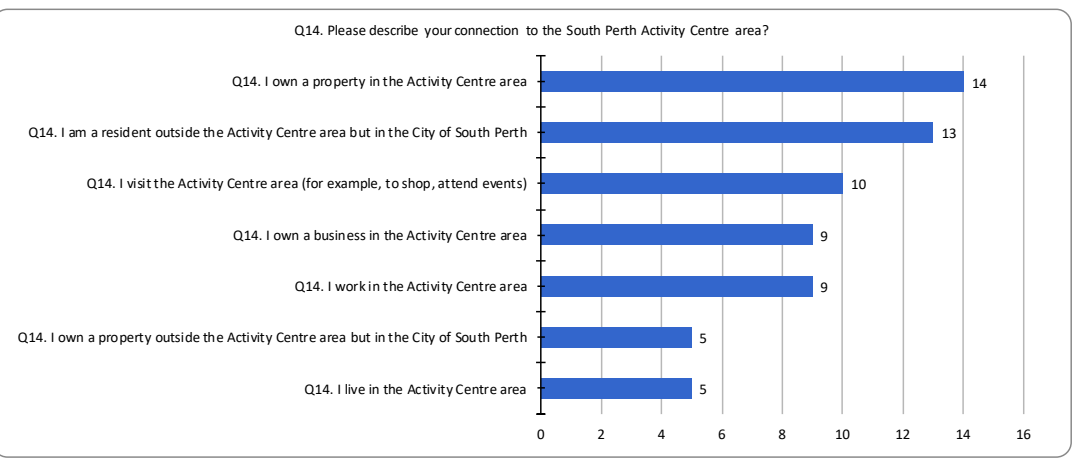
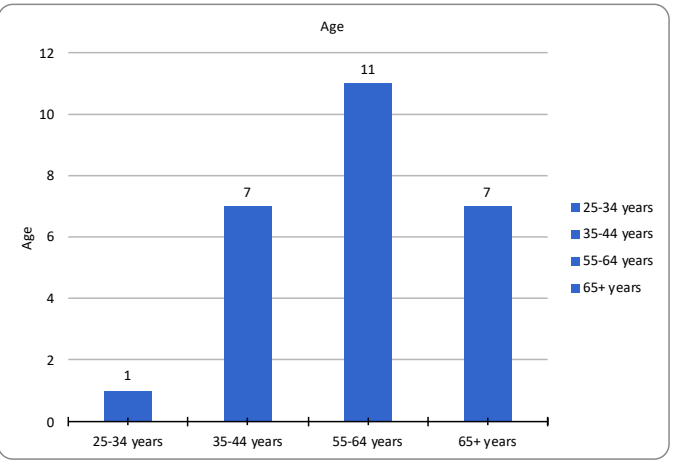
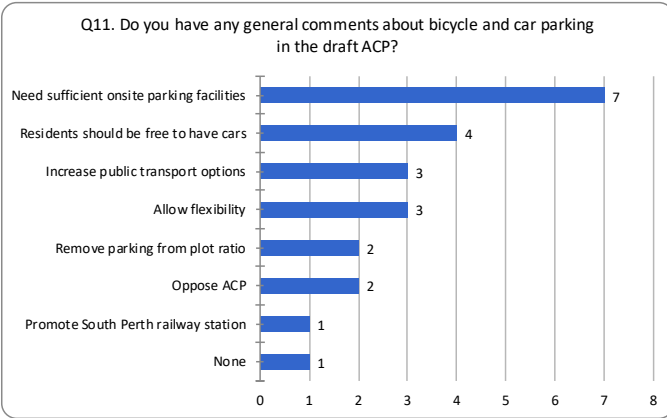
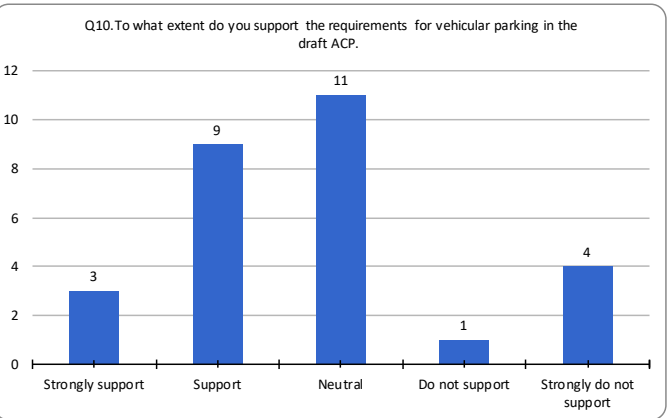
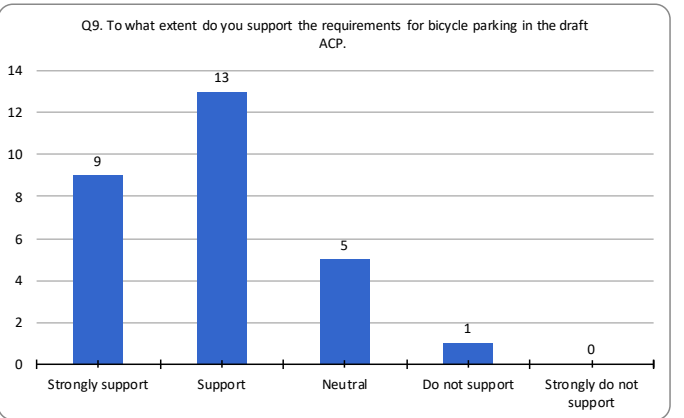
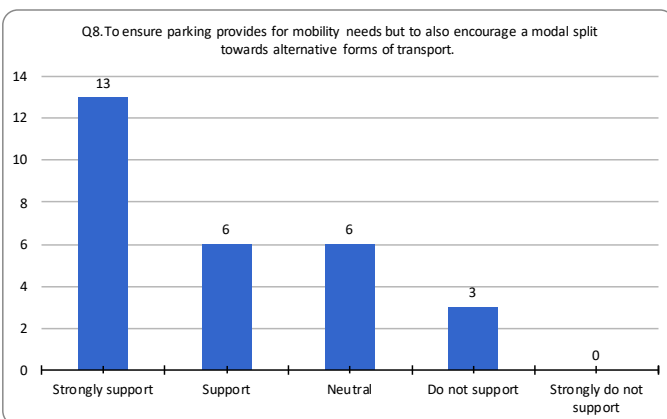
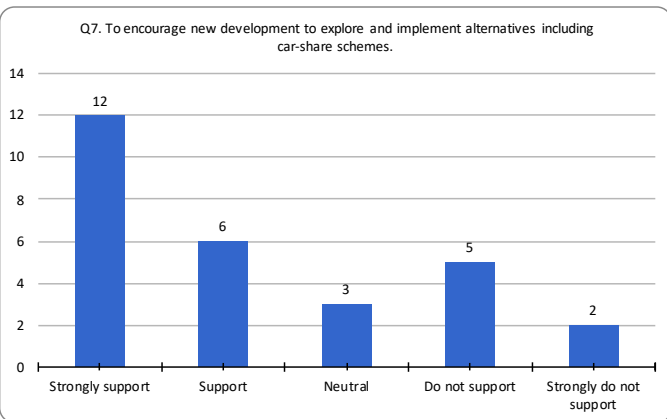
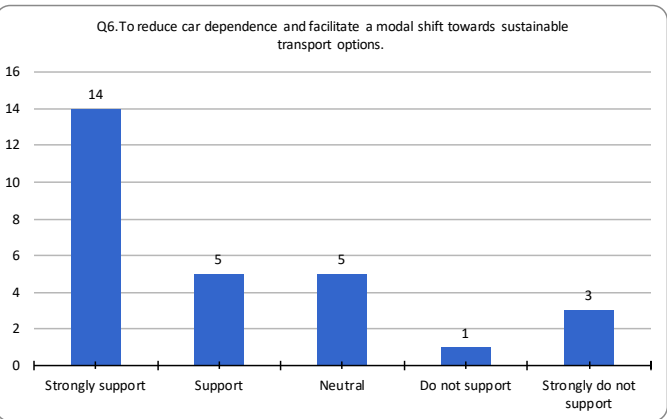
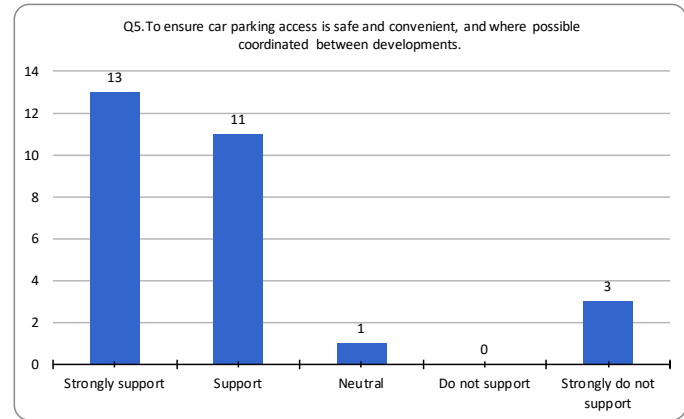
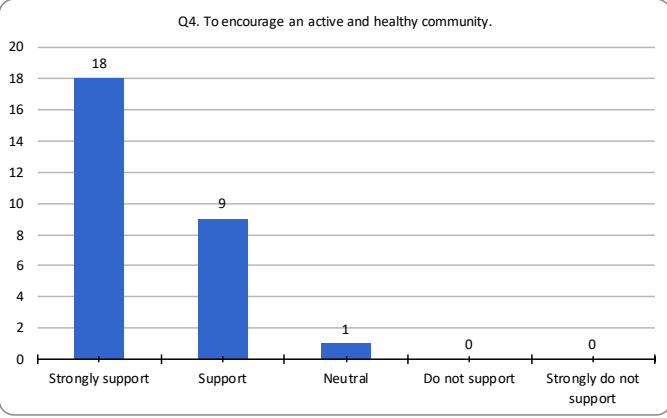
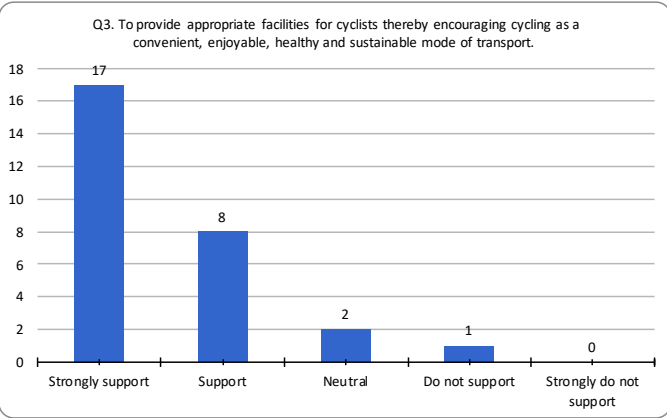
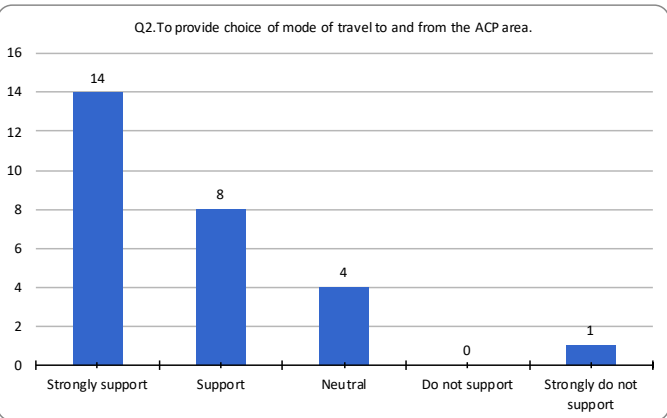
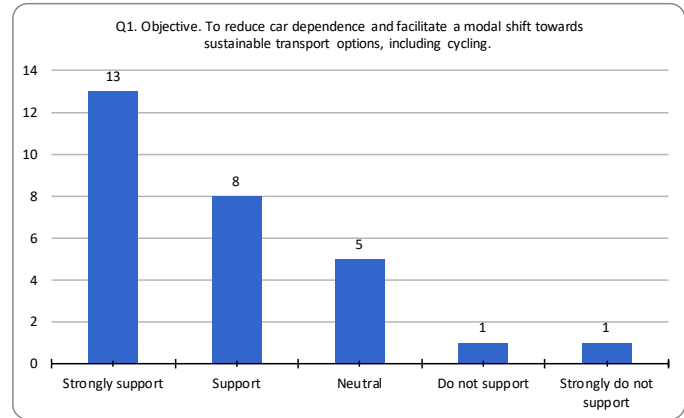




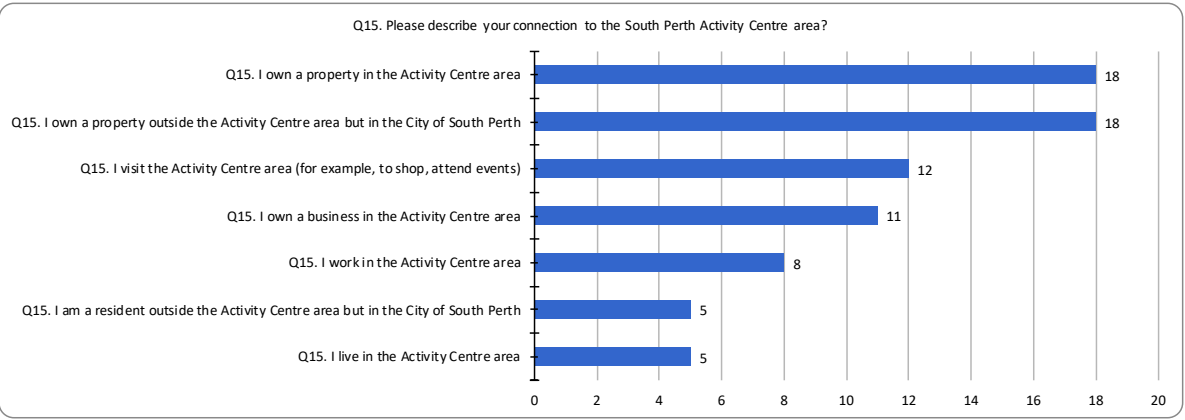
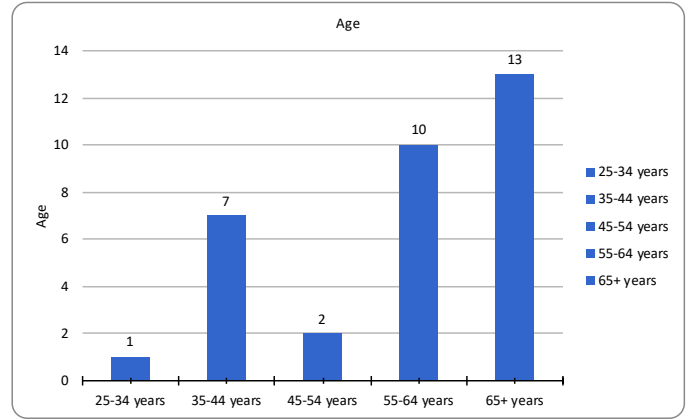
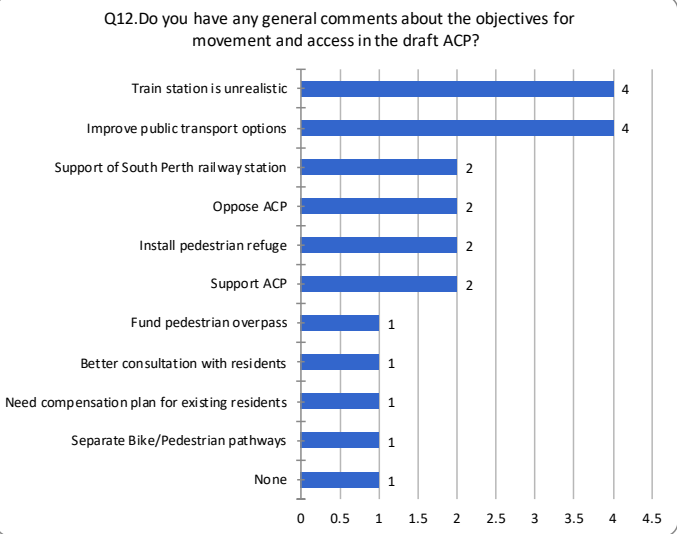
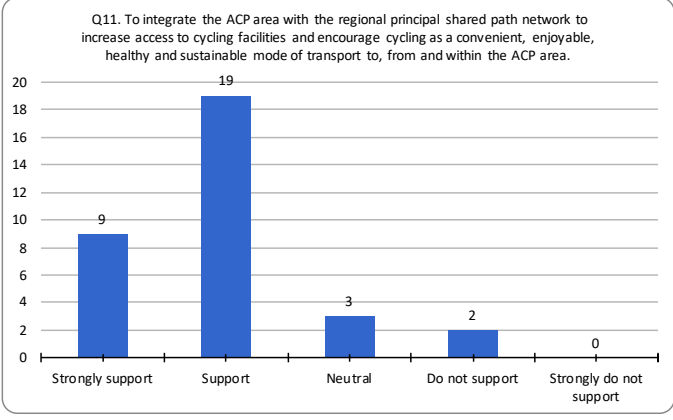
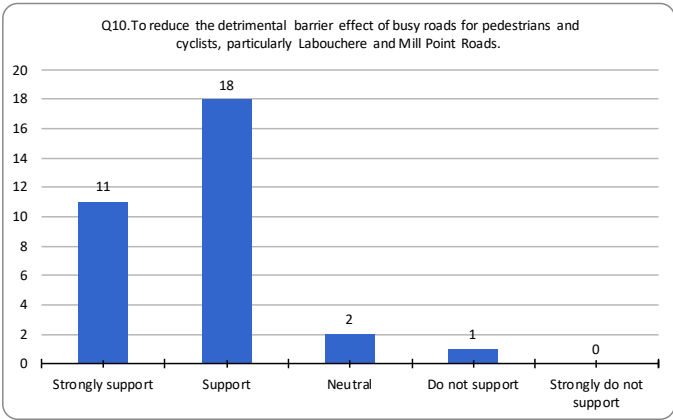
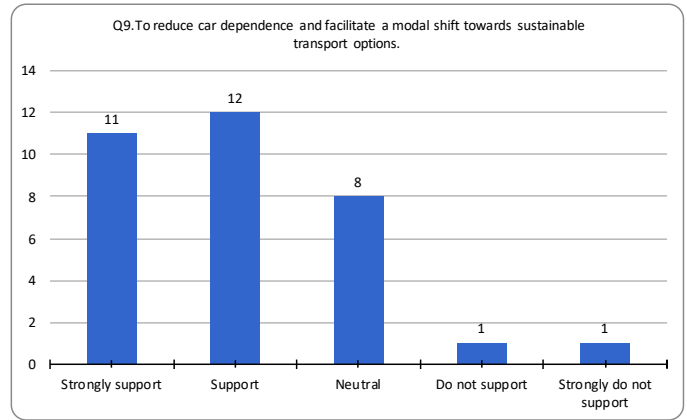
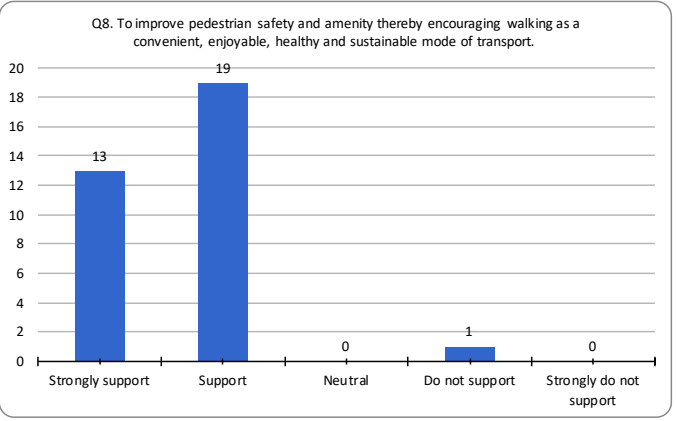
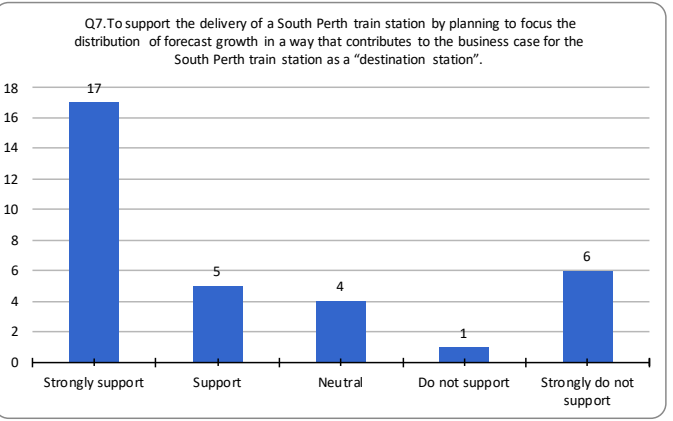
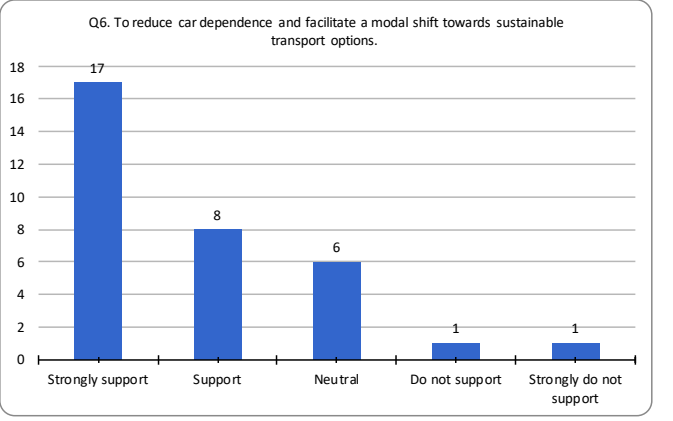
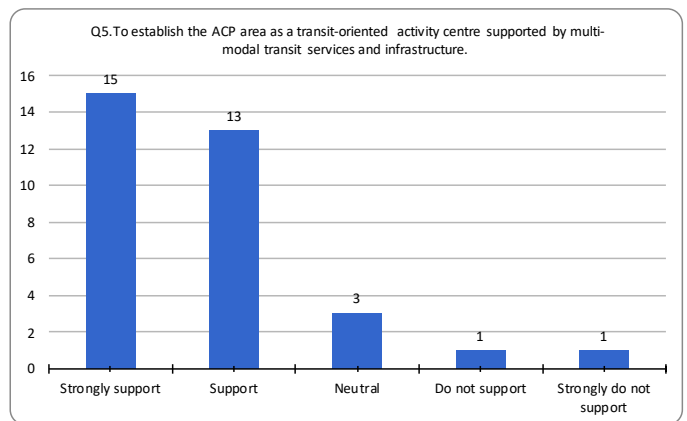
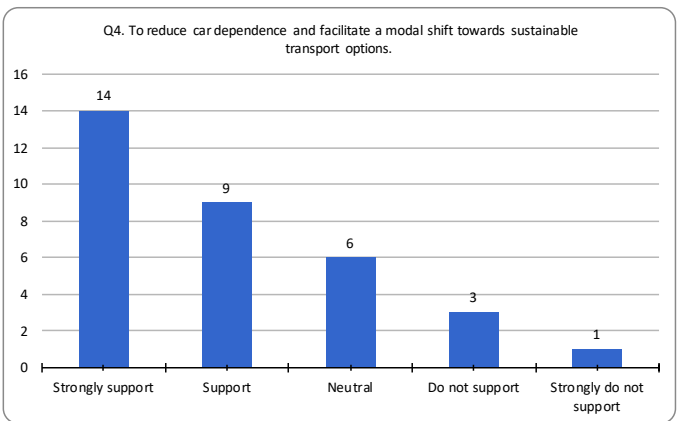
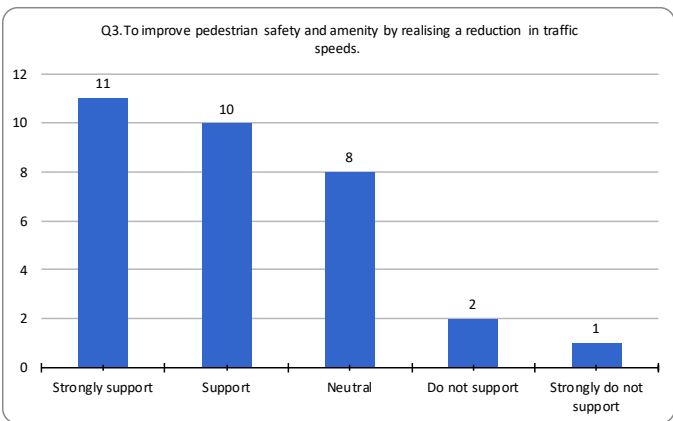
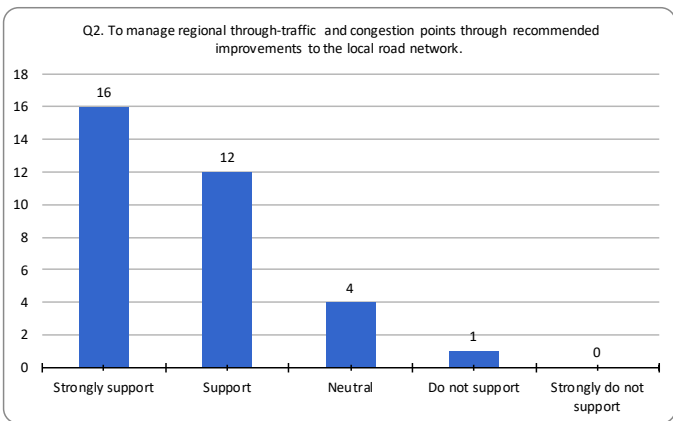
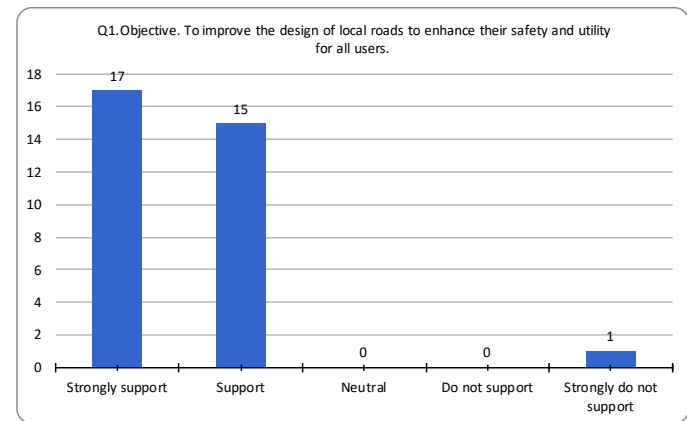
Additional Development



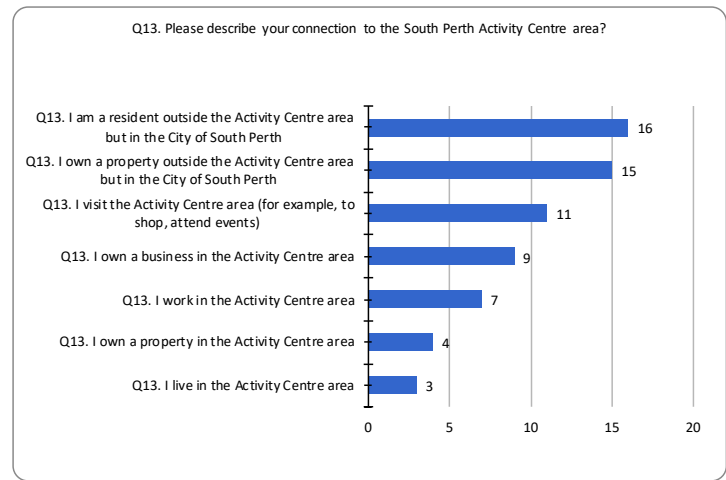
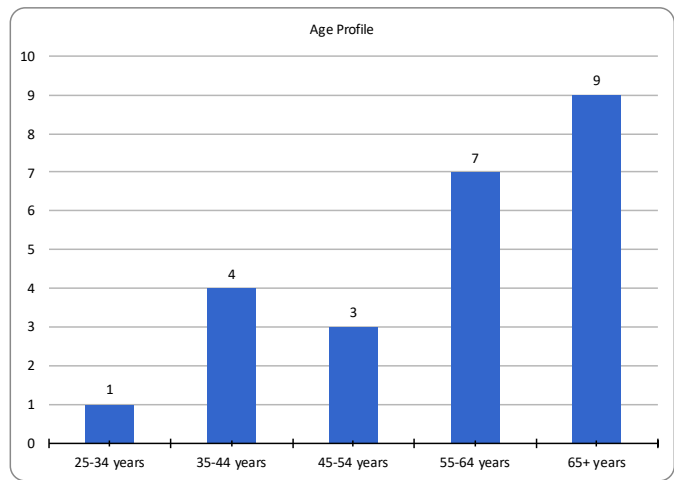
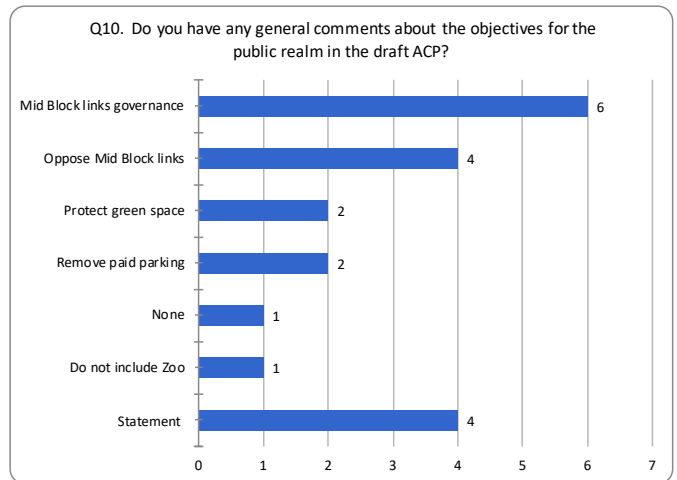
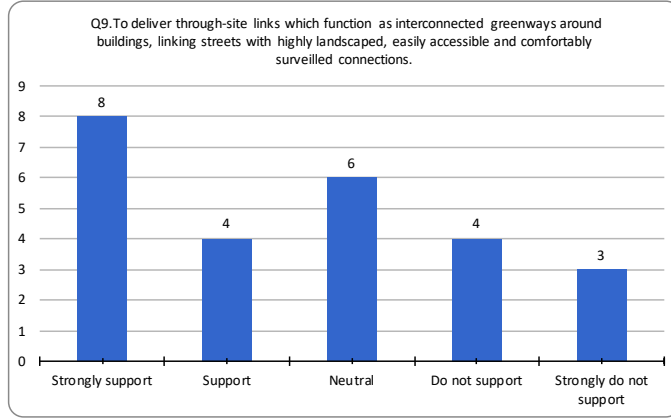
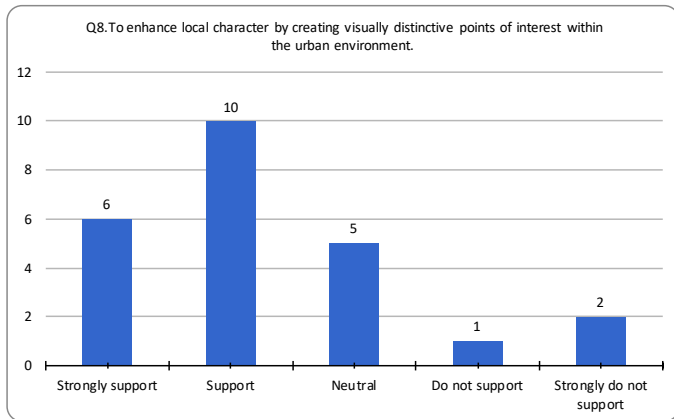
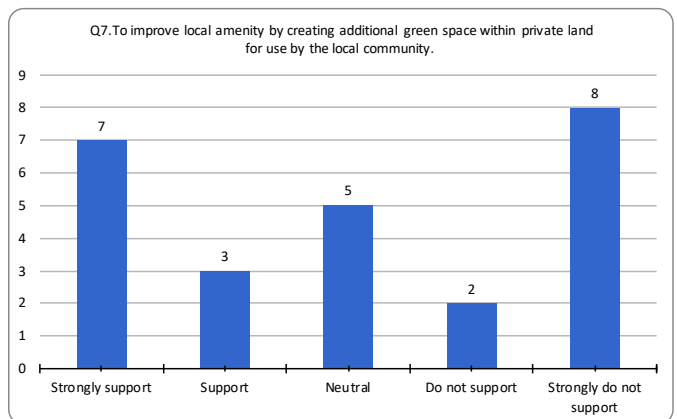
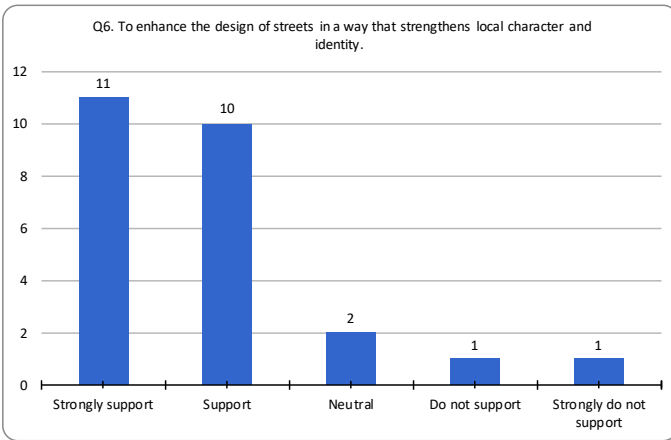
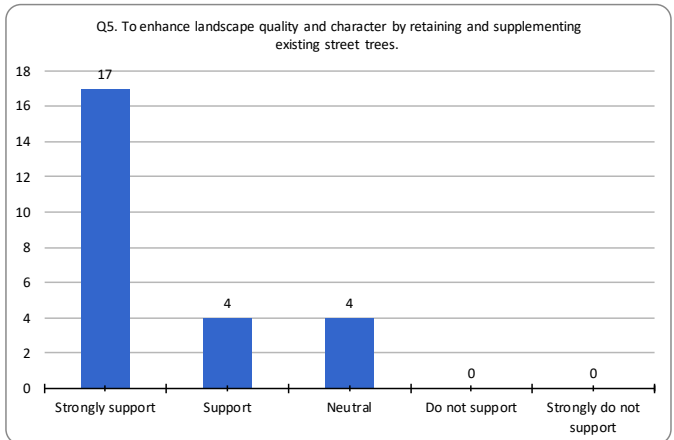
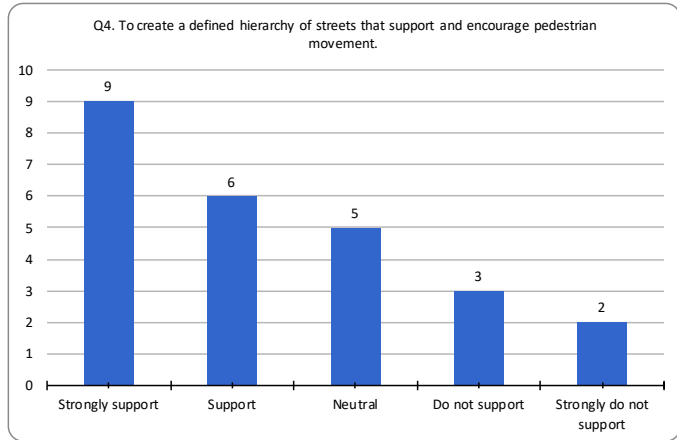
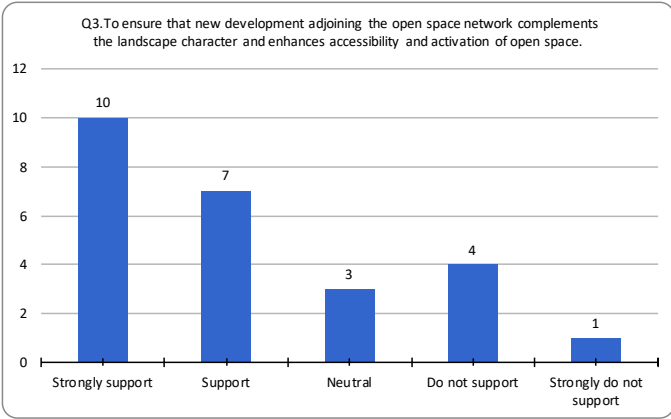
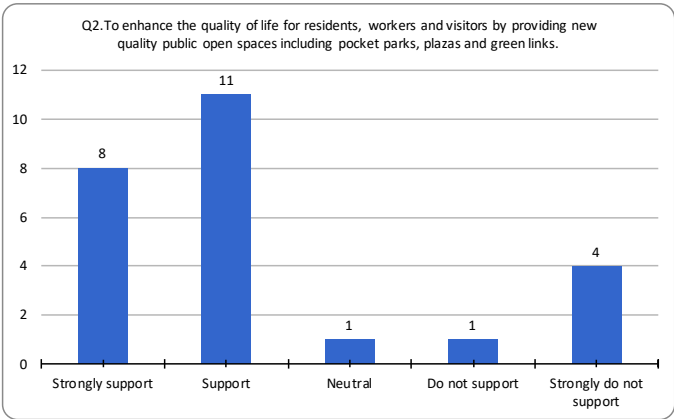
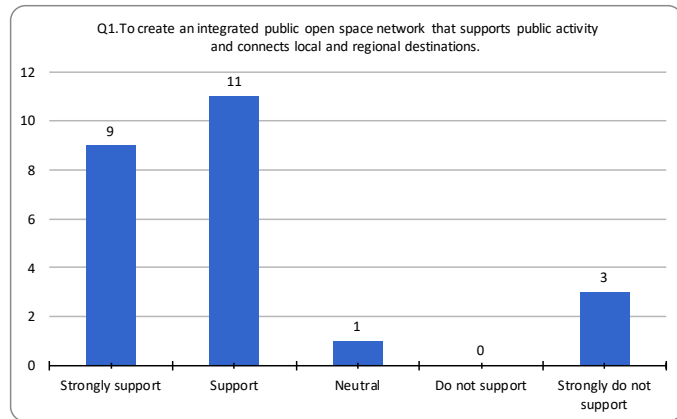
Bicycle and car parking feedback



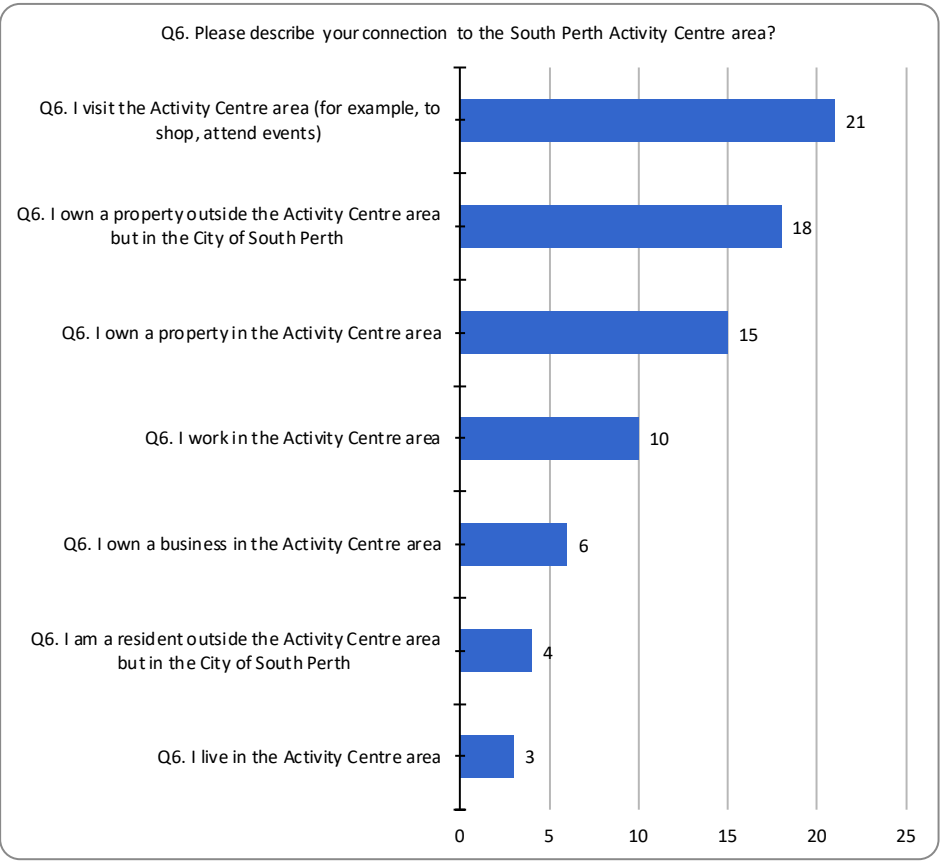
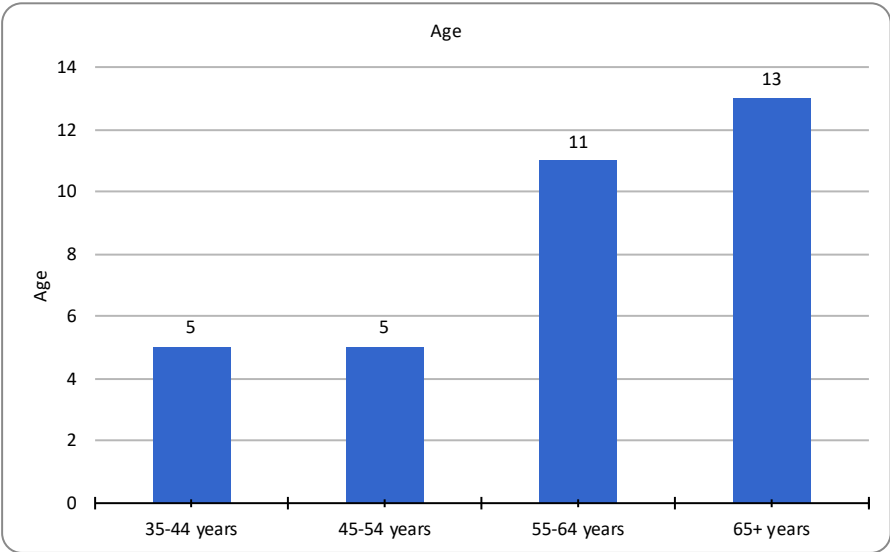
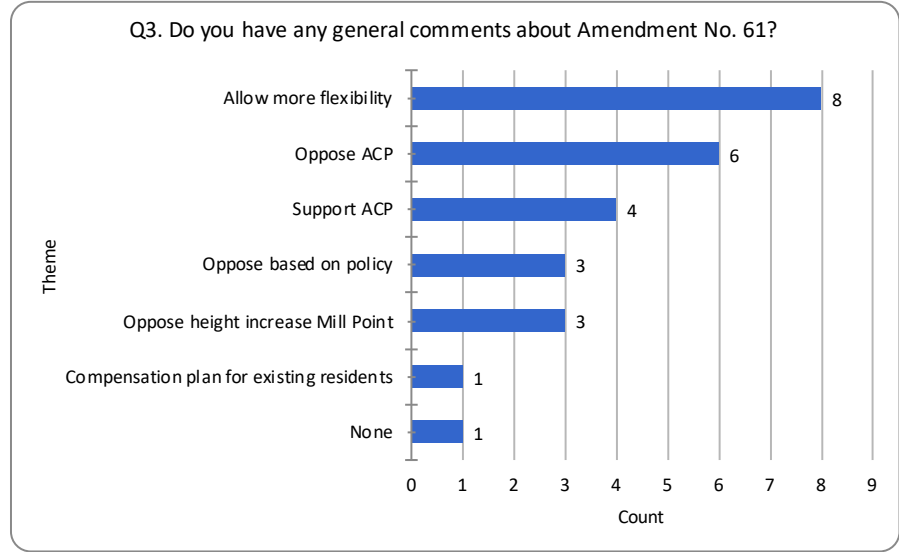
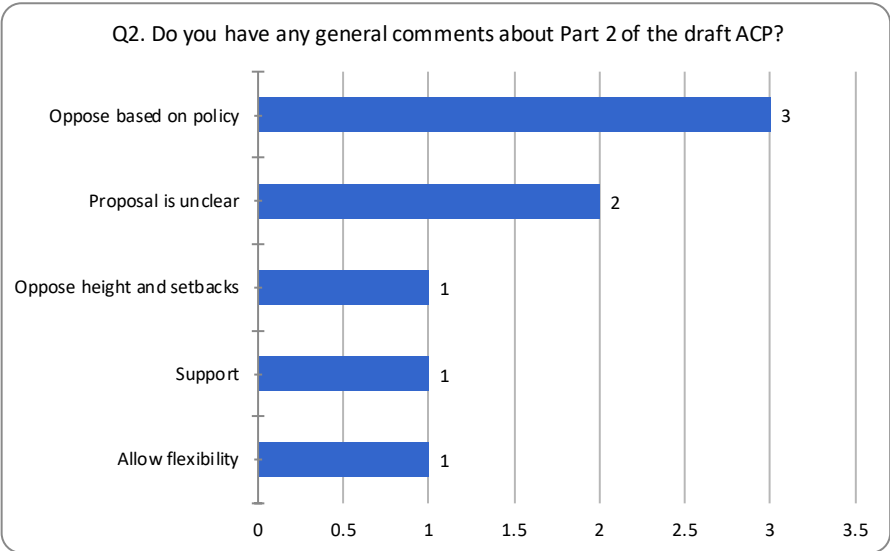
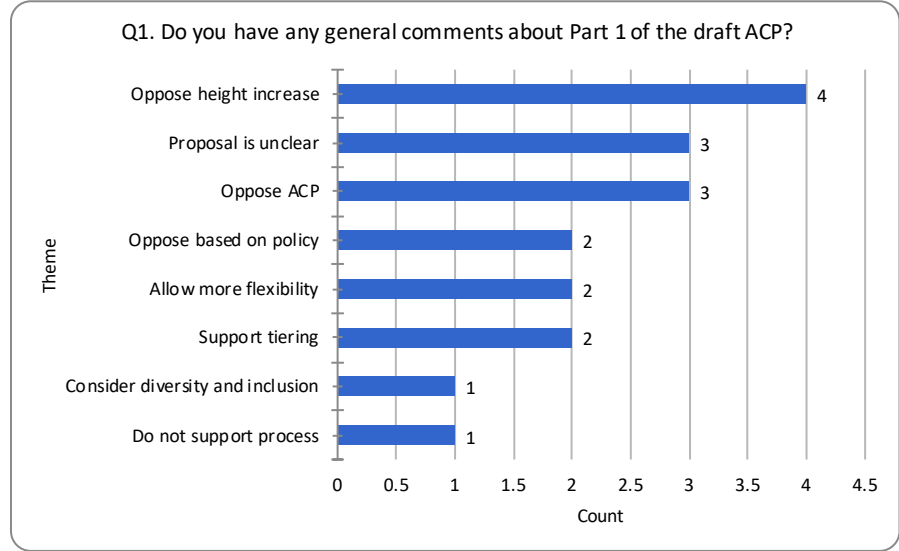
Movement & Access Feedback



Public Realm Feedback



General Comment Feedback



# Proposed Local Planning Policy P321 Feedback

Q1. Please provide your feedback below on draft Local Planning Policy P321:  
South Perth Activity Centre Competitive Design Policy

