

Note: The names and addresses of each submitter has been removed from the schedule to protect everyone's privacy, but each submission is numbered. Please contact the City's Strategic Planning team on 9474 0777 or via enquiries@southperth.wa.gov.au should you wish to obtain your submission number and review the response.

Draft South Perth Activity Centre Plan and proposed Town Planning Scheme Amendment No. 61

Schedule of Submissions

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
1	18 July 2019	Email	Not support	<p><i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>Purchased a unit at Aurelia for location and the beautiful uninterrupted view. My confidence in recommending buying property in South Perth to my friends and family is in jeopardy. We already have a surcharge on property purchase here, so this recommended height change by Council is not pleasing.</p> <p>Value of properties within the ACP area, as well as Perth in general, will drop due to the height change. I am not impressed and will be fighting to keep our clear view.</p> <p>The height changes along the Esplanade in front of REVA and along to Fraser Lane made me consider selling but this is unfair. Recommend amending the height changes back to 17.5m.</p> <p>The extra traffic congestion, noise, pollution and expected bad health is a worry.</p> <p>We have been told by Real Estate Agents that the view would not be blocked but be clear towards the Perth City from our height level 10 and 11.</p> <p>Please reconsider and lower the height to same height as many front units along South Perth Esplanade. That height limit I believe is 17.5m.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The existing Town Planning Scheme No. 6 has a building height limit of 25 metres in this area, which is measured to the finished floor level of the upper-most storey. This allows for a building of up to approximately 30 metres height in total. Properties on South Perth Esplanade to the east of Harper Terrace are able to have additional height above this building height limit, with no upper limit on building height. Tower setbacks are required to be 4 metres or less and there are no tower floorplate area limits.</p> <p>In the location subject to this submission the base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>Whilst it is recognised that the existing development 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 (and noting that such a right is also subject to potentially unexpected impacts such as natural disaster response etc).</p> <p>Where no such restrictive covenant or other legally binding agreement exists, a buyer should assume that the planning frameworks may be subject to change and should be prepared for future planning review such as large-scale precinct planning. The detailed structure planning of the South Perth area has been foreshadowed for some time.</p> <p>It is not recommended to decrease the building height limit in this location. However, it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p> <p>It is not recommended to introduce a specific ratio of width and length, or similar quantitative requirement, to address this matter as there is variation in lot size, shape and orientation across the ACP area. It is therefore more effective to set a performance-based requirement that allows for appropriate solutions to be designed and assessed.</p>	ACP 11 & 12
2	22 July 2019	Email	Not support	<p>The concept of developing a South Perth Activity Centre Plan (ACP) has merit as it should enable specific development which aligns with community ideas and expectations. The many objectives outlined in the ACP may seem ideal but are not detailed adequately throughout the ACP with sufficient supportive evidence/modelling to enable the community to fully appreciate all impacts now or in the future.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> The retail and other commercial services that the centre provides 	<p>ACP – 7, 11, 12, 14, 15, 16, 18</p> <p>A61 – 2, 7, 8, 11-17, 20-28</p>

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				<p>What is the justification of an additional 4500+ dwellings in the ACP? It should <u>not be a maximum</u> capacity, but what is ideal for the entire area given its current character status. The ACP objectives do not represent or maintain the uniqueness of this riverside suburb that sets it apart.</p>	<ul style="list-style-type: none"> State government policy to accommodate residential growth in the inner city as greater Perth grows Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>The ACP as presented does not meet the community expectations that we have witnessed at numerable community workshops and consultations. South Perth should not be another CBD or an extension of the Perth CBD.</p> <p>‘The objective to encourage land uses that contribute to the desired character of each character area’ is not reflected in what the ACP is proposing. It is about increasing density development, to a maximum, which is not in keeping with any of the four character areas. The high-rise developments will be viewed as visual pollution. E.g. “Mill Point character is mostly residential while the Mends Street character is predominantly non-residential’ does the ACP aim to hold this ‘character’ as it appears this Draft plan aims to change this ‘character’.</p> <p>The four character areas are very unique in that they contain historical sites, excellent river frontages and an important tourist destination.</p> <p>Existing level of development and heights within each area is what gives the entire area its character. Accepting There may be scope for future development, that level of development should blend in with the existing.</p>	<p>The character of the South Perth ACP area has been through many iterations over time, each one enhancing or, in some cases, replacing a pre-existing character. The character analysis of the area in Part 2 of the ACP and detailed engagement with the community identified key features that contribute to the character such as wide street setbacks and trees. The ACP picks up these key features and sets requirements to replicate or complement them, whilst also acknowledging that an increase in population in the area will need to be accommodated.</p> <p>It is the aim of the draft ACP and proposed Amendment No. 61 to contribute to the next period of evolution of character for the South Perth ACP area, which includes an increase in the population.</p>	
				The existing unique and rare cluster of red-brick Heritage Building on the corner of Mill Point and Mends Street must continue to be easily viewed and linked as a Heritage precinct.	Heritage buildings are protected under the existing town planning scheme. Extra protection is also given through section 4.3.2 of the ACP, which may require a heritage impact assessment.	
				The <u>land use</u> should encourage greater tourist/community involvement to enjoy the environment that the areas have the potential to provide. This aspect should be given a high priority to encourage greater healthy lifestyle activities e.g. open spaces, walkability, social engagement. ACP should allow creation of a facility that multiple developments combine their green space	Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.	

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				<p>requirement to facilitate a larger area, which might then provide space for recreational sporting activity.</p> <p>The foreshore area along the Esplanade could be improved by creating a <u>bigger boardwalk area</u> and ensuring cyclist are separated for all pedestrian activity. Better public toilets facilities are essential. Also family friendly shelters could be erected.</p> <p>The proposed building height limits are not considered appropriate. The high classification shown in the Richardson area along Labouchere Rd and adjacent the Perth Zoo is extreme. The Pinnacles building already has demonstrated this (zero setback does not provide a ground level sense of space) and with many more like it will not enhance the area visually. Furthermore, the issues such as: <u>shadow</u> effect, wind factors, parking, traffic movement have not been adequately detailed in the ACP and what these impacts will have on the area. This will be particularly significant to Perth Zoo. This also applies to the Landmark Site.</p> <p>We strongly recommend that a series of <u>3D scale models</u> are created to demonstrate a ‘real life’ visual which will enable the community to fully appreciate how all developments will affect and impact not only the new structures but existing homes, buildings and spaces.</p> <p><u>Podiums</u> create a massive base structure occupying most of a site. Setback requirements are minimal and while podiums may be appropriate for commercial structures, they are not considered appropriate for any form of residential building. If they are seen more as a means of providing car parking space this is not justified. Below ground parking facilities can be provided subject to engineered design etc. to overcome any ground water issues.</p>	<p></p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>Improvement to facilities along the foreshore is occurring as part of the Connect South project and can be encouraged over time as part of ongoing upgrades to the precinct</p> <p>Properties immediately adjacent to Perth Zoo on Labouchere Road cannot be taller than approximately 17 storeys (the Pinnacles building is 20 storeys). In addition, the impact of shadow on the Zoo has been taken into consideration and each development will be assessed on its merits.</p> <p>It is reasonable to include specific provisions in Amendment No. 61 that ensure the Zoo is protected from overshadowing.</p> <p>A modification to the ACP is recommended to add an objective and requirement to limit overshadowing of the Zoo.</p> <p>The City is investigating 3D modelling to enable better visualisation of new developments within current and future streetscapes. Simple forms of 3D modelling that show building envelopes without design parameters can be misleading and are not always an accurate representation of the future outcomes, especially where there are a number of possible built form variations.</p> <p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	

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				<p>The <u>height</u> of towers as proposed within the ACP is not acceptable. There is a lack of evidence in the ACP on shadowing effects, wind turbulence and glare impacts.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p><u>Design quality</u> must be paramount for all development. We ask that clear parameters of ‘quality’ are clearly defined and maintained. This applies to buildings, landscaping etc. The aim must be to create an ACP that is VIBRANT and significant.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However, policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				<p><u>Local Planning Policy P321:</u> South Perth Activity Centre Competitive Design Policy, as presented, provides very good policy on how design quality is to be managed. Also Design WA will also important within this process. This of course will be depended on total compliance with the Policy and not subject to internal/external manipulations to avoid strict compliance.</p> <p>The ACP has not given attention to the impact all the development will have on existing infrastructure. Will educational facilities be able to cope with the increased population? Short term</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p>	

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				<p>accommodation would be a valuable addition to the area and has not been factored in the plan.</p> <p>The Public Benefit Framework objective ‘To provide guidance in the exercise of discretion by decision makers’ is a cause for concern. Experience tends to indicate that this really a ‘way out clause’ so as not to conform to the original conditions/requirements. Hence undermines community expectations on how well compliance will be applied.</p> <p>In regard to Public Benefit Contributions it is not possible to consider the significance of this until a plan, open for community comment, is made available (not expected till late 2019).</p>	<p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>While the concept of <u>encouraging bicycle use</u> is a healthy consideration, an increase in bicycle usage and movement is not clearly outlined in the ACP. The roads within the ACP were not designed for bicycles and cars. Clearance between vehicles and cyclist is critical. Unless separate cycle ways are provided, problems will occur in the future, not only between motorists and cyclists but with pedestrian traffic.</p> <p>The objective to ‘reduce car dependence’ will be almost impossible to achieve without some form of financial or other incentive to make it attractive for a person to forgo the use of a vehicle.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The Movement & Access Plan (draft ACP Plan 4, page 50) recommends improvements to cycle paths and footpaths along Labouchere Road and Mill Point Road. A regional principle shared path is also recommended alongside South Perth Esplanade and Melville Parade. Section 5.3 of the draft ACP sets out objectives and guidance for pedestrian and cyclist infrastructure.</p> <p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>Lack of current <u>car parking</u> is an issue not addressed. Parking for the Perth Zoo is inadequate. Additionally car parking areas are not addressed to cater for visitors from metropolitan/country regions.</p> <p><u>Traffic</u> movement at the Mill Point/Labouchere intersection is a single entry point from South Perth to Perth city via the Narrows. (AND entry to South Perth from southern freeway traffic). Earlier plans to make an entry and/or exit to freeway at South Terrace have been quashed – therefore currently there are only two entry/exit to Freeway from/into South Perth and this will not be increased despite huge increase in resident numbers. This section already demonstrates traffic movement problems.</p> <p>Traffic from outside the South Perth area, travelling through the ACP area to gain access to the Narrows is significant at present. This needs to be addressed in the modelling process, as well as the impact of car movement from the Landmark development should development proceed.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p> <p>The maximum parking requirements for commercial development seek to achieve a similar outcome by encouraging workers to access the site via more sustainable transport options.</p>	
				A circuit route is required. Tourists are constantly asking how to get to Fremantle from South Perth, the best option unfortunately is to	Comments Noted.	

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				<p>send them back to the city, currently it requires catching a bus to Canning Highway and change to Fremantle. With the proposed increased density and population growth this will increase and become a major problem. The ACP does not provide adequate traffic modelling to show how this will be managed over the build-up of development to 2041.</p> <p>Public realm is the most important objective and hopefully will be achieved to make the ACP a vibrant and character filled area.</p> <p>While it is recognised that Amendment 61 is a draft, the full implications of the amendment cannot be assessed until a final ACP is provided/determined. Only then can the appropriate amendment 61 be considered taking into account all aspects/submissions within the final ACP.</p> <p>Is community involvement/feedback relevant? The simple answer is NO. Local Government, not the ratepayer/community, see themselves as the masters of our destiny. This is no different to other levels of government. One has only to read in the newspapers of the conflicts ratepayers are having with development proposals in several local government areas across metropolitan Perth. The results seem clear, community/ratepayers views, significant as they are, are ignored.</p> <p>This was evident at a City of South Perth special council meeting held on 6 March 2019, regarding matters relating to the ACP. Ten community presentations (which were excellent and well thought through) were delivered to the Council meeting. Not one suggestion was even considered to be looked at by the Council or staff. No acknowledgement of their contribution was given. The Council had instead its own motion in place.</p> <p>The amount of time, expenditure given to this entire ACP process, with community engagement, demands that before the final ACP is drawn up, the communities input/concerns etc must be addressed, to show what is accepted or otherwise and the reasons for the decisions.</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p>	
3	22 July 2019	Email	Support	<p><u>Land Uses</u></p> <ul style="list-style-type: none"> • ‘Indoor Sporting Activities’, to enable small scale health studios or gymnasiums to be developed in the area, where compatible with the predominant residential use. • ‘Serviced Apartment’, to enable short stay accommodation land uses that are compatible with the predominant ‘Multiple Dwelling’ land use for the area; and • ‘Shop’, to permit more diverse retail offerings, as opposed to ‘Local Shops’ only, which only allow for small-scale convenience shopping facilities. This will allow for greater flexibility to provide activation at ground level where deemed appropriate 	<p>Indoor Sporting Activities are discretionary in Mends, Richardson and Hillside character areas with a DC or D use. Serviced Apartment are discretionary in Mends, Richardson, and Hillside with a D use.</p> <p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments and Indoor Sporting Activities be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	ACP 6, 7, 11, 12 A61 – 2, 7, 8, 12-17, 20-28

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					Shop and Small Bar uses are proposed as an ‘X’ use in the Hillside and Mill Point character areas and ‘P’ and ‘D’ respectively in Mends and Richardson. It is not recommended to change the permissibility of these uses.	
				<p><u>Building Height</u></p> <p>Acknowledges the tiered approach to building height that is proposed. have concerns regarding the criteria established for achieving the Tier 1 and Tier 2 height limits, including:</p> <ul style="list-style-type: none"> • The cash contribution approach to obtaining additional height and plot ratio; and • The design quality criteria that are proposed with respect to the Tier 2 height limits. <p>Question the rationale for including the properties fronting South Perth Esplanade between Frasers Lane and the southern boundary of the Mill Point Character Area within the ‘Medium’ height area, when all land fronting South Perth Esplanade to the north of Frasers Lane is included within the ‘Low’ height area. To maintain the character of South Perth Esplanade, we request that the relevant properties currently shown in the ‘Medium’ height area, being numbers 49-63 South Perth Esplanade, are reclassified to the ‘Low’ height area. This will provide consistency with the development to the north and ensure that development fronting South Perth Esplanade maintains a consistent maximum height of 17.5 metres within the Mill Point Character Area.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>It is not recommended to decrease the building height limit in this location. However, it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	
				<p><u>Podium Setbacks.</u></p> <p>The podium street setback provisions applicable to development in the Mill Point Road precinct are considered to be excessive.</p> <p>In addition, it is considered illogical for two different setback requirements to apply to the Mill Point Road frontage of our development site.</p> <p>Maintaining different setback requirements for podium side and rear boundaries is also considered unnecessary and potentially confusing in the context of corner sites</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	

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				<p><u>Tower setbacks</u></p> <p>In addition to projecting balconies, the provisions should enable architectural features or solar shading devices to be excluded from the maximum tower floorplate calculation.</p>	Comment noted	
				<p><u>Plot Ratio</u></p> <p>question the need to include maximum plot ratio controls as part of the proposed Amendment, given that the draft provisions already contain detailed controls on podium and tower footprints, building height and setbacks that effectively dictate the ultimate built form/envelope to the extent that plot ratio serves no function. In our view, the inclusion of maximum plot ratio controls is unnecessary in this context, noting that plot ratio is an arbitrary control that has no direct correlation with good amenity outcomes in higher density precincts.</p> <p>Do not object fundamentally to the actual quantum of allowable plot ratio. Do object to the definition of plot ratio floor area including all car parking and associated circulation areas at or above ground level.</p>	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.	
				<p><u>Design Quality – Element 7</u> of draft Scheme Amendment No. 61</p> <p>Object to the requirement to undertake a competitive design process</p> <p>It is considered that the requisite level of design quality can be achieved through the application of the fundamental principles of State Planning Policy 7.0 – Design of the Built Environment (SPP7.0), which focusses on a system of design quality that is based upon:</p> <ul style="list-style-type: none"> Establishing ten key design principles against which all built environment proposals are to be assessed; Ensuring that proponents utilise building designers with the necessary design skills to deliver good project outcomes; and Incorporating well-managed and consistent design review as part of the application process. 	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	

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				<p><u>Approval for Additional Development Potential – Element 8 of draft Scheme Amendment No. 61:</u></p> <p>City may wish to consider dispensing with the concept of community benefit being intrinsically linked to building height and plot ratio bonuses, noting the recent difficulties this has caused with respect to the issues of proportionality and the extent to which a specific community benefit is deemed to be meaningful in a given area.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p><u>Street interface</u></p> <p>Question the rationale for mandating the width of street frontage tenancies for the ‘Active’ street interface to between 6 and 9 metres wide.</p>	<p>Retail and commercial units are to be articulated with a width of between 6 and 9 metres in active streets to ensure variety and a human scale are maintained in the street interface. This contributes to creating an active pedestrian-friendly environment.</p> <p>This requirement is included in the draft ACP and so can be varied if there is sufficient justification that the objectives and desired outcome will be achieved in an alternative way.</p>	
				<p><u>Deep Soil Zones</u></p> <p>Question the rationale for including such a high percentage of deep soils zones in a higher density activity centre such as the South Perth Peninsula.</p> <p>Encouraged by some of the improvements in the new draft documents, they are still considered to be overly complex and restrictive in places, and would benefit greatly from clearer and more generalised discretionary powers that would promote high quality and site responsive design outcomes.</p>	<p>Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3.</p> <p>The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping.</p> <p>Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.</p>	
4	22 July 2019	Email	Support	<p><u>Transit Oriented Development around the ferry.</u></p> <p>Land should be shown as high</p> <p>Mends character area be extended North west wards along South Perth Esplanade up to Frasers Lane.</p> <p>Lots in centre of block as depicted be designated as High with Tier 2 to allow for high thinner towers.</p>	<p>The ACP as a whole has been developed with influence from TOD principles, however individual sites have not been singled out as TOD.</p>	<p>ACP – 6, 9, 25, 27, 28</p> <p>A61 – 14-19</p>

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				<p><u>Land Use</u></p> <p>Land uses for Mends Street (Hotel, Serviced Apartments, Mixed Development, Tourist Accommodation, Tourist Development become ‘P’ uses.</p>	<p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	
				<p><u>Podiums</u></p> <p>Should be as per Map 3 without further conditions. More flexibility to be allowed to consider good design.</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
				<p><u>Tower setbacks</u></p> <p>More flexibility to allow for better design.</p>	Comment Noted	
				<p><u>Design Quality</u></p> <p>Landscaping be reduced to same as Design WA SPP 7.3</p> <p>Deep soil Zones be reduced to same as Design WA SPP 7.3</p>	<p>Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3.</p> <p>The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping.</p> <p>Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.</p>	
				<p><u>Bicycle and Car Parking</u></p> <p>Minimum parking requirements be deleted</p> <p>Maximum parking for ‘other non-residential uses’ be modified to 2 bays per 100 sqm NLA</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p> <p>The maximum parking requirements for commercial development seek to achieve a similar outcome by encouraging workers to access the site via more sustainable transport options.</p>	
				<p><u>Above ground parking be removed from Plot Ratio</u></p>	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide	

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					underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.	
				<u>Movement and Access</u> first sentence in Clause 4.3.8.2 be modified to read: “Crossovers to on-site parking shall be limited to one per development. For sites with more than one street frontage, additional crossovers may be considered where it can be demonstrated the Objectives of Clause 4.3.8 will be satisfied, provided that a maximum of one crossover is provided per street frontage.”	The suggestion that it may be desirable for sites with more than one street frontage to provide access from more than one frontage has merit. There are a number of reasons why more than access point may be desirable, particularly on larger sites, including to manage access to parking and waste collection areas within buildings. It is recommended to modify the relevant development requirement in Part 1 of the ACP to reflect this suggestion.	
				<u>Public Realm</u> Mid-block links and pocket park locations should be negotiable.	Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. There is no requirement for any property to provide a mid-block link or pocket park. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
5	17 July 2019	Email & Feedback Form	Not support	<i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i> <u>Email submission</u> A key flaw in the surveys and information in these plans is the forecast number of residents. This forecast for the Activity Centre area does not represent a natural increase in population for a suburb of Perth. A nearly 100% increase over 13 years is just wrong. How can such an increase be sustainable and retain the character and amenity of our suburb.	A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support: <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area. 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. The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
				<u>Feedback form</u>	Comments Noted	

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				<p>Building heights are far too high - South Perth is not the CBD.</p> <p>A system is important; however, I do not agree with the allocated areas for the categories.</p>		
				<p>Remainder of submission is as per the South Perth Peninsula Action Group pro-forma submission.</p>		
				<p>Supportive of all the stated objectives relating to:</p> <ul style="list-style-type: none"> consistency with State planning an appropriate and realistic density increase protecting and enhancing character areas limiting height and density to protect existing residents' amenity a non-residential Plot Ratio that encourages retail and business consistent street setbacks that protect the trees and streetscapes no need for podiums in residential areas that reduce green space increased dwellings that still allow manageable traffic excellence in design quality over aiming for quantity improved green spaces with liveable, walkable and safe areas <p>The City and JDAP will assess the design against the requirements in Amendment No. 61. The submitter is concerned that Amendment No. 61 lacks strong requirements and statements that ensure the objectives are met. In some cases, the requirements are weak, and some objectives have even been overlooked altogether.</p>	<p>All buildings within the draft ACP area must meet a high standard of architectural design. Design quality standards are defined in Section 4.3.3 of the draft ACP, and all development must meet a minimum good standard of design quality, with higher standards required for buildings that propose development above the base height and/or plot ratio.</p> <p>Development requirements for design quality are also prescribed in Amendment No. 61, including that all development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area.</p> <p>Development that exceeds the Tier 1 height/plot ratio limit must be of exemplary design quality, which is to achieve a very high standard, above and beyond excellent design. This process consists of a competitive design process undertaken with a minimum of three suitably qualified architects and is independently assessed in accordance with the City's South Perth Activity Centre Competitive Design Policy (policy P321).</p> <p>These requirements ensure that high standards of design will be achieved for all development, with increased scrutiny to ensure taller buildings are of very high quality and are sensitive to the surrounding development.</p>	
				<p>REMOVE THE UNCERTAINTY</p> <p>The ACP is supposed to provide certainty for the community and developers. With so many allowances for 'discretion' in areas of height, bulk, setback, shadows, use, quality, impact etc. it is implausible to say it improves certainty. If an ideal is worthy, such as setbacks, then they should be set as a minimum with discretion only allowed to improve the amenity of neighbours or the area – NOT TO ALLOW MORE DEVELOPMENT.</p>	<p>Section 1.4 of the draft ACP provides parameters for the use of discretion. The discretion allows for innovation in design while keeping within the guidelines.</p>	
				<p>THE PLAN SHOULD ONLY BE ACCOMODATING POPULATION TARGETS FOR 10 years IN LINE WITH THE Local Planning Strategy (LPS)</p> <p>The LPS is the strategic document, setting dwelling and density targets for the whole of South Perth. Planning to 2041 in this ACP is inconsistent and is what allows such tall towers that are not needed</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> The retail and other commercial services that the centre provides 	

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				<p>to fulfil WAPC targets. They are only “needed” to fulfil developer’s wishes and that is not proper planning.</p> <p>There are no valid planning reasons that justify unlimited height in this ACP – it is a lower District Centre for many good reasons and cannot sustain the density of a CBD without significant change to the entire area – and that is a contradiction to the objectives and a contradiction to the infill objectives of the WAPC.</p> <p>LIMIT DENSITY & DWELLING NUMBERS TO MATCH WAPC FIGURES AND STATE FRAMEWORK</p> <p>This plan has used a convoluted calculation using previous non-compliant and failed developments to increase the population forecasts well beyond the WAPC targets. This plan should not be “accommodating” previous development requests – it should have been a clean slate as we were told it would be at the Roberts Day Place and Design Forum.</p> <p>The dwelling numbers required to achieve the targets of 2031 can be accommodated in approximately four towers, or they could be spread across the area, which would be a much better result for existing residents and allows more boutique developments rather than quantity over quality as we see with Civic Heart, Aurelia and Pinnacles.</p>	<ul style="list-style-type: none"> State government policy to accommodate residential growth in the inner city as greater Perth grows Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				There should be NO ‘unlimited heights’ at all.	Unlimited heights are not proposed in the draft ACP and proposed Amendment 61.	
				<p>REMOVE ALL INCREASED BUILDING HEIGHTS FROM THE PENINSULA</p> <p>The boundary line for any increased height should be at Ferry Street. This area is a significant landscape, strong character, geographically constrained for traffic flow, sensitive to ground water problems and was included in the original plan by manipulating surveys and bowing to considerable developer lobbying.</p>	<p>The existing building height limits in this area under Town Planning Scheme No. 6 allow for up to approximately 9 storey buildings on properties fronting Mill Point Road north of Frasers Lane. Properties south of Frasers Lane have potential for unlimited building heights as they are within the Special Design Area under Schedule 9A of Town Planning Scheme No. 6.</p> <p>The advertised Medium-High typology for properties fronting Mill Point Road would allow for buildings up to 37.5 metres (approximately 11 storeys) in height, or up to 57.5 metres (approximately 17 storeys) if the Tier 1 additional height criteria can be met. Tier 2 additional development potential is available south of Frasers Lane (building height limit 90.3 metres, approximately 27 storeys).</p> <p>The northern part of the peninsula area is relatively far from the centre of the ACP area and is less accessible by public transport and car than other parts of the ACP area. There is therefore a planning rationale to reduce the typology of properties fronting Mill Point Road north of Frasers Lane from Medium-High to Medium.</p> <p>The recommended Medium typology would allow for approximately 7 storey buildings at the base height, or up to 11 storeys if the Tier 1 additional height criteria can be met. Tier 2 additional development potential is not available in this area.</p>	
				TAKE THE TRAIN OUT OF THE PLAN	Comments noted. Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	

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				<p>There is no justification to increase density to such an extent just to gain a train station to meet the needs of that new influx of residents. If this fanciful aim is pushed then the 800m walking area around the station site is the only area that can be justified to increase density and building heights beyond low/medium density.</p> <p>If the logic of extending the boundaries of the ACP are followed then the ACP should extend further south not north. Residents on the Peninsula will not walk 1.3kms to a station.</p>	<p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	
				<p>SETBACKS NEED TO BE CONSISTENT</p> <p>Setbacks in the Peninsula area are less than on the Ridge, which makes no sense. Setbacks should maintain the Mill Point Rd North Streetscape – renowned as one of the best streets in Perth and should not be compromised.</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Street setbacks in the Mill Point character area are generally 15 metres to South Perth Esplanade, 8 metres to Mill Point Road, Melville Parade and Scott Street, and 6 metres to minor streets. These minimum setback requirements reflect the existing and desired future character of the area.</p>	
				<p>NO PODIUMS IN RESIDENTIAL AREAS</p> <p>Podiums are ‘inconsistent’ with Residential Character areas, as they allow the carpark of a building to take up the majority of the site leaving little area for deep soil trees and buffers between buildings. Podiums in retail areas may be justified.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				<p>INCLUDE INCENTIVES FOR MORE COMMERCIAL & RETAIL</p> <p>The original reason for the Station Precinct Plan was to ensure a sustainable workforce within the area. (Employment Self Sufficiency and Employment Self Containment). There is nothing in this plan to encourage commercial development.</p>	<p>Section 3.1 of the draft ACP sets objectives and development requirements for land use within the ACP area. Development requirement 3.1.4 require minimum amounts of non-residential space in new developments in the Mends and Richardson character areas. This requirement is to provide for growth in local services and employment opportunities. This requirement combines with preferred uses at ground level (Schedule 9B Provision 5 element 1.10) to provide requirements for commercial and retail uses.</p>	

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					There is opportunity to broaden development requirement 3.1.4 to allow the development of some floors to convert at a later stage from residential to non-residential uses. This could be mechanisms such as minimum floor heights for areas that would otherwise be required to be committed to commercial requirements.	
				<p>REMOVE THE ZOO FROM DENSITY CALCULATIONS</p> <p>A 'density' calculation defines a relationship between the number of dwellings in an area, and the amount of recreation space available for residents beyond their residential building. This plan includes the Zoo as a 'recreation space' in its density calculations. This is disingenuous as no one can walk the dog, fly a kite, kick a football or ride their bike etc. in the zoo - it is not open access. The plan claims a 'density' about 30 but if you take out the Zoo it is actually about 50 – a CBD number.</p>	The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.	
				<p>RESTRICT OVERSHADOWING</p> <p>The requirements for overshadowing are inadequate as they fail to take in the length of the shadow and only look at the next neighbour. Shadowing, pollution, noise and wind assessments, just like traffic impact, should be cumulative based on the build out forecast.</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June (mid-winter).</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p> <p>Section 8 of Part 1 of the ACP sets out the supporting documentation required to be provided with development applications in the ACP area, including Noise, Transport and Wind Impact assessments.</p>	
				<p>TRAFFIC MODELLING IS INADEQUATE AND SHOULD BE REDONE</p> <p>The Flyt Vehicle Movement Report is misleading and inadequate. It is based on extrapolations from out-of-date and inaccurate modelling of previous development applications. It does not even attempt to use full build-out scenarios.</p> <p>The Draft ACP states that the traffic congestion will be so significant and chaotic that it will be the moderator of congestion as people will stop driving. This is very poor planning and a contradiction of the ACP objectives.</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p>	
				<p>IMPACT ON ZOO</p> <p>One of the most common comments from zoo visitors is 'who allowed that monstrosity to be built there overshadowing and towering over the zoo'. A number of studies, such as an environmental impact study and community impact study should have been completed before this Draft was released.</p>	Properties immediately adjacent to Perth Zoo on Labouchere Road cannot be taller than approximately 17 storeys (the Pinnacles building is 20 storeys). In addition, the impact of shadow on the Zoo has been taken into consideration and each development will be assessed on its merits.	

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				<p>There should be no shadowing of the ZOO along Labouchere Rd – the lower heights should be extended north to include Lyall St – not leave one site on the corner where a major developer has plans for a 44 storey building.</p>	<p>It is reasonable to include specific provisions in Amendment No. 61 that ensure the Zoo is protected from overshadowing. A modification to the ACP is recommended to add an objective and requirement to limit overshadowing of the Zoo.</p>	
				<p>IMPACT ON NEW RESIDENTS</p> <p>There is no work been done on the social impacts of extreme high-rise developments. There is no report on the rationale for the preference for this building form and no other scenarios of built form have been presented.</p>	<p>Comment Noted.</p> <p>The Place and Design project engaged a large number of experts and stakeholders, including local residents, to review the vision for the area. Through this project a clear preference emerged for slender towers with space between, rather than shorter bulky buildings.</p> <p>High rise development at this scale is considered to be suitable in the Perth context where access to high amenity public space and proximity to services is available.</p>	
				<p>LACK OF INFRASTRUCTURE REQUIREMENTS & WHO PAYS</p> <p>A developer contribution scheme or similar is an essential component of a good plan. The GHD report associated with Amendment 25 (2012) highlighted a number of significant infrastructure constraints which the residents trust will be provided by developer funds, not rates. New developments should enhance the area, not burden the existing residents with increased rates, traffic congestion, lowering of amenity, safety etc.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>QUALITY BUILDINGS – NOT QUANTITY</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p>	

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				SUSTAINABLE BUILDINGS - Needs higher minimum green star ratings	<p>The six star rating in the BCA refers to an energy rating such as NatHERS. Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which represents Australian best practice. Buildings seeking additional height are likely to consider higher ratings to meet other design outcomes and demonstrate design excellence.</p> <p>The Green Star rating system includes many aspects of sustainable development, of which energy is only one</p>	
				GROUNDWATER CONSTRAINTS	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				FLOODING CONSTRAINTS	<p>The Department of Water and Environmental Regulation request a condition be place on all developments that reflects that the proposed development has adequate flood protection from a 1 in 100 (1%) Annual Exceedance Probability (AEP) flood.</p> <p>The suggestion that the developments have adequate flood protection can be accommodated by placing a standard condition on the development approval by the approving authority; however it is recommended to include a development requirement to ensure that this matter is considered as early as possible in the design process. The impact on the floodplain can be considered as part of the stormwater management plans.</p>	
				ON STREET PARKING PROBLEMS	On-street parking is managed in line with the City's Parking Management Plans.	
				<p>LACK OF 3D MODELLING</p> <p>The lack of 3D imagery is a very telling indictment on the city's claim to be open and transparent. Other cities are able to provide these images to their residents, so they are clear as to what they are agreeing to or not.</p> <p>The token poor image provided is misleading. It does not depict the numbers of dwellings forecast, they do not show any shadowing and do not show what a typical street would look like.</p> <p>To not provide prospective images is misleading – an image of Mill Point Rd north with a row of 30 storey buildings down the spine and 8 or 9 storeys all around the edge would certainly frighten the residents. But that is what is proposed on this draft plan.</p>	<p>The City is investigating 3D modelling to enable better visualisation of new developments within current and future streetscapes. Simple forms of 3D modelling that show building envelopes without design parameters can be misleading and are not always an accurate representation of the future outcomes, especially where there are a number of possible built form variations.</p>	
				CHANGES TO HEIGHT LIMITS	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance	

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				<ul style="list-style-type: none"> RESTRICT THE YELLOW TEIR 2 ‘ADDITIONAL POTENTIAL’ BACK TO JUST AROUND MENDS AREA ONLY - THERE IS SUFFICIENT DEVELOPMENT POTENTIAL IN TIER 1 REMOVE TEIR 2 HEIGHT FROM LOW, MEDIUM, & MEDIUM HIGH – Sufficient Height in Base & T1 REPLACE LOW-MEDIUM GREEN – WITH LOW <p>MEDIUM HIGH ALONG LABOUCHERE RD SHOULD CONTINUE TO LYALL ST to PREVENT SHADOWING ZOO</p>	<p>of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	
6	14 & 17 July 2019	Email & Feedback Form	Not Support	<p>There are approximately 50 small lots in the Richardson Street Precinct all having frontages of 14.08 metres, depth of 42.24 metres & areas of 597 square metres. Collectively they make up approximately 50% of the land area in the Richardson Street Precinct. The South Perth Activity Centre Plan states that these lots will be encouraged to amalgamate into larger development lots.</p> <p>Many owners will not want to do this but rather redevelop their small 597 square metre lot with an individual small 3 to 4 level office building to accommodate their expanding businesses. Due to the provision of over generous setbacks in the Activity Centre Plan rebuilding is virtually impossible on these lots</p>	<p>The vision for the Richardson character area is for a variety of lot sizes and building heights to be developed to higher density overall in order to take advantage of the high accessibility of the area and to support development of the South Perth train station. In order to achieve this, it is necessary to encourage the amalgamation of lots to form larger development sites, while also allowing smaller buildings to be developed on smaller sites.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>The side and rear setback requirements are necessary to manage development on larger lots to protect the character and amenity of the area. At the same time, it is important to provide sufficient flexibility to allow smaller sites to develop where appropriate.</p> <p>It is not recommended to reduce street setbacks in the Richardson character area, as street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p>	ACP – 6, 9 A61 – 14-19
				<p>All streets in the Richardson Street Precinct are already 20.12 metre wide streets running east west receiving maximum sun light. The ACP stipulates a further 6 metre road front set back on both sides of the street for Charles Street, Hardy Street & Bowman Street widening the streetscape by a further 12 metres or a massive 60% increase in width. For Lyall Street & Judd Street a further 6 metres will be added to the streetscape width or a huge 30% increase. This will not add vibrancy but rather impede good street front building design & discourage pedestrian interaction with ground level shops & cafes recommended under permitted uses.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	

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				<p>Setbacks to side and rear further seriously compound the impediment to fit a building on a 33% building floorplate of 6.08 metres wide on a 597 sqm lot. Virtual full site coverage to front, side & rear boundaries is necessary to provide a street shop front, lobby entry, lift, fire exit stairs, workable internal office areas, vehicle drive entry & required parking to the rear ground floor to service 2 or 3 upper levels of offices</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
				<p>There are too many building planning controls which will restrict design & create a series of boring stereotype buildings.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p>	
				<p>Building height should relate to numbers of storeys rather than a measured height to encourage higher ceiling heights to living/office spaces.</p>	<p>The advantage of measuring height in storeys is that it is easy to interpret and provides incentive for developers to provide greater floor-to-ceiling heights. However measuring heights in metres provides greater certainty regarding the permissible height of buildings.</p> <p>The ACP sets minimum floor to ceiling heights and requires high standards of architectural design. These requirements combine to encourage generous floor to ceiling heights as a component of high amenity apartments.</p> <p>It is recommended that height limits remain in metres to provide certainty regarding building heights; however, it is also recommended that a table and explanatory note be added to section 4.1.1 of Part 1 of the ACP to explain the approximate number of storeys that may be possible for each height typology.</p>	
				<p>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.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p>	
				<p>Guidelines for podiums make building impossible on small 597 square metre lots which are common to the Richardson 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.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
				<p>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.</p>	<p>Comment noted. A 3 storey podium helps to provide a human-scaled interface with the street and provides sufficient opportunity for above-ground carparking if that is desirable for the development.</p>	

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				Tower setbacks should be flexible to allow individual design relative to the style, height & bulk of neighbouring development	Comment noted. Tower setbacks requirements are minimums and larger setbacks can be provided.	
				Tower floorplate as set out in the ACP is not workable on sites smaller than 1,800 square metres which is 3 amalgamated small 600 square metre lots common to the Richardson Precinct. In most streets in the Richardson 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.	Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.	
				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.	The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes. Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.	
				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 expect 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.	All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design. Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the draft ACP area. Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits. It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However, policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.	
7	17 June and 18 July 2019	Email	Not support	Understand the need to increase density and don't care if buildings go to 50 stories high in South Perth, when they are in appropriate locations. But the 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.	As per Submission 1 response	ACP 11 & 12

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				<p>It makes some sense for higher density for one block either side of Mends St, but the area northwest of Harper Tce should remain LOW.</p> <p>Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1.</p> <p><u>Email submission</u></p> <p>37m high buildings on South Perth Esplanade will significantly impair the value of investments. The height limits should revert to the original 17.5m in uniform with all the land fronting the Esplanade.</p> <p><u>Pro-forma submission:</u></p> <p>City of South Perth Council have approved a plan to increase building heights on the foreshore from the existing 25m level to 37.5m from Fraser Lane to Mends Street. Originally the height limit was 17.5m but amended to 25m and now proposed at 37.5m.</p> <p>This will mean newly completed apartments such as REVA and QUEST will be overshadowed and buried 12.5m below any high-rise developments that occur on the foreshore.</p> <p>With the recent demolition of a residence on the NE corner of Harper Terrace, a derelict home on the NW corner of Harper Terrace and older units next to it, it is likely that high-rise developments will occur in the short term on these parcels of land. Even without development occurring, the building height limit change will dramatically affect capital values. Any development will also have a downward impact on rental returns for Aurelia, REVA and QUEST, if views are affected.</p> <p>Both REVA and QUEST will lose the winter thermal benefits of the Northern sunshine which greatly reduces the use of air conditioning. In REVA's case, the solar heated swimming pool will be shadowed, rendering the pool's solar heating equipment less effective. AURELIA will also suffer some degree of winter thermal heating loss, resulting in higher use of air conditioning.</p> <p>In the case of AURELIA a number of North facing apartment owners, who paid a premium of up to \$250k EXTRA for their views beyond the 25m "Future Clear View Line", which was heavily promoted by selling agents, will now lose their views. Many AURELIA residents will not only lose their clear views but will suffer substantial financial losses of up to \$350k when stamp duty and commissions are factored in.</p> <p>On the 6/3/ 19, the City of South Perth held a Special Meeting where the Councillors unanimously approved a scaling back of building heights along the Esplanade from 24.3m to 17.5m from the Narrows Bridge up to Fraser Lane and scaled back the building heights of 37.5m to 17.5m from East of Mends St (from 85 South Perth Esplanade) but unfairly ignored the impact of higher levels from</p>		

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				<p>Fraser Lane to Mends Street where 25m is current but 37.5m is being proposed!</p> <p>The rationale for Council scaling back the heights was "that the Esplanade heights should be preserved with a low typology to provide a better interface to the foreshore and an appropriate transition to the higher buildings along Mill Point Road that enjoyed existing views."</p> <p>The above criteria should also have been applied along the entire foreshore east of Fraser Lane to Mends St for owners of AURELIA, REVA and QUEST apartments. The entire South Perth Esplanade should have been treated EQUALLY and an unobtrusive height of 17.5m equally applied.</p>		
7a	17 June 2019	Feedback Form	Not support	<p>Understand the need to increase density and don't care if buildings go to 50 stories high in South Perth, when they are in appropriate locations.</p> <p>But the 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.</p> <p>It makes some sense for higher density for one block either side of Mends St, but the area northwest of Harper Tce should remain LOW.</p>	As per Submission 1 response	ACP 11 & 12
8	22 July 2019	Email	Not Support	<ul style="list-style-type: none"> Parking within the City should be standardised. The planning schedule should be for 10 years max nobody knows where we will be in 20-30 years. A critical part in this study/proposal is to ascertain the most accurate forecasts of the number of new residents, apartments and car bays. Provide additional parking for Zoo Question capacity of Roads 	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> The retail and other commercial services that the centre provides State government policy to accommodate residential growth in the inner city as greater Perth grows Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016.</p>	

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					<p>This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
9	22 July 2019	Email	Not support	<p>Why haven't Property Owners/Residents living along the South Perth Esplanade, overlooking the Swan River and Cityscape, between Fraser Lane and Mends Street, been treated “equitably” as part of the current re-zoning plans? That is, the same as other Property Owners/ Residents located West of Fraser Lane and East of Mends Street?</p> <p>We decided to invest an apartment in AURELIA of South Perth because we love the area, the life style, the people and the most appealing to us is that the City so far appeared to have been planned and controlled “Smartly”, with a very sensible vision in order to extend the best quality of life consistent with the surrounding river environment. However, when we learnt that the City of South Perth Councillors had approved a proposal to increase building heights on the foreshore to 37.5m from Fraser Lane to Mends Street we were confused and annoyed because there appears to be no logical rationale for such a decision.</p> <p>We were further concerned that the Property Owners/ Residents between Fraser Lane and Mends Street have not received the same equitable consideration and respect, when compared with Property Owners/ Residents, located West of Fraser Lane and East of Mends Street.</p> <p>Prior to purchasing our AURELIA Property, we clearly recalled our question to the real estate agent as to the possibility of future changes that would enable high rise buildings along the Esplanade. The answer was'this will not happen!!'.</p> <p>At the same time, we enquired with the City Planning Office and we were similarly advised that there will NO Plans to change any of the existing zoning in the immediate vicinity of the AURELIA complex.</p> <p>Based on what is now being proposed, the advice we were given by both the real estate agent and the City at the time of purchasing our AURELIA property was wrong and or misleading.</p> <p>We understand that the rationale for Council scaling back the heights West of Fraser Lane and East of Mends Street from 37.5m to 17.5m, was ..."that the Esplanade heights should be preserved with a low typology to provide a better interface to the foreshore and an appropriate transition to the higher buildings along Mill Point Road that enjoyed existing views."</p>	As per Submission 1 response	ACP 11 & 12

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				<p>SURELY the above criteria should also have been applied along the entire foreshore east of Fraser Lane to Mends Street for owners of AURELIA, REVA and QUEST Apartments, if an Equitable outcome is to be achieved.</p> <p>In other words the entire South Perth Esplanade should have been treated the same, ie. An unobtrusive height of 17.5m equally applied.</p> <p>Respectfully suggest that the City of South Perth rethink its current rezoning proposal associated with the South Perth Activity Center Plan and opt for an Equitable/ Uniform height limit along the entire Esplanade.</p>		
10	22 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
11	22 July 2019	Feedback Form	Support	<p><u>General Feedback</u></p> <p>Would like to see less development controls – height, plot ratio, car parking, setbacks, podium + tower base + % site cover are too many controls when combined together – this will stifle design + disincentivise development or result in unvaried undesirable outcomes.</p> <p>Plot ratio + site coverage should be the two key controls, in addition to maximum podium height.</p> <p><u>Land Use</u></p> <p>1. To what extent do you support the objectives for land use in the draft ACP? –</p> <p>Objective I - Support</p> <p>Objective ii. – Neutral</p> <p>Objective iii. – Strongly support</p> <p>Objective iv. – Support</p> <p>Objective v. – Support</p> <p>2. To what extent do you support the requirements for land use in Schedule 9B of proposed Amendment No. 61? – Support</p> <p>3.What changes would you suggest to the requirements for land use in Schedule 9B of proposed Amendment No. 61?</p> <ul style="list-style-type: none"> Child Care should not be permitted in the Mends Area Zoning definitions seem archaic, would like to see future lifestyle uses being implemented (e.g. where are electric vehicle charging stations being encouraged?) Would like to see Aged care as a 'Preferred Use' somewhere, e.g. Mill Point Area, to encourage this sector of development with some certainty. 	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p> <p>Child Care and Aged or Dependent Persons' Dwelling are listed as a 'D' or 'DC' use in all character areas. It is not recommended to change the permissibility of these uses, as this provides for some flexibility in approving the use, whilst also providing for control over development.</p> <p>Hotel and Serviced apartment uses are discretionary in Mends, Richardson and Hillside character areas with a DC or D use.</p> <p>It is recommended that Serviced Apartments and Hotel be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	ACP – 6, 9, 27, 28 A61 – 13-19

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				<ul style="list-style-type: none"> The ACP is commended for greatly reducing the minimum non-residential requirement for development. Hotel and Serviced apartment should both be permitted/discretionary in the Mill point and Richardson precinct 		
				<p><u>Building size (Height and Plot Ratio)</u></p> <p>1. To what extent do you support the objectives for building height In the draft ACP?</p> <p>Objective i. – Neutral</p> <p>Objective ii. – Support</p> <p>Objective iii. – Strongly support</p> <p>Objective iv. – Neutral</p> <p>Objective v. – Strongly support</p> <p>2.To what extent do you support the objectives for plot ratio In the draft ACP?</p> <p>Objective i. – Do not support the addition of all other controls in addition to plot ratio (height setbacks etc)</p> <p>Objective ii. – Support</p> <p>Objective iii. – Neutral</p> <p>3.To what extent do you support the requirements for building height and plot ratio in Schedule 98 of proposed Amendment No. 61 - Support</p> <p>4. What changes would you suggest to the requirements for building height and plot ratio In Schedule 9B of proposed Amendment No. 61</p> <ul style="list-style-type: none"> No height limit – plot ratio and other controls are more than enough. Plot Ratio should not include car bays: <ul style="list-style-type: none"> This will delay development/construction and development appetite, adds an unnecessary complexity (the car parking maximums have the effect of disincentivising excessive car bays), increase costs of development by forcing developers to put all carparking underground (Into the water table which is not a great outcome) Makes development unachievable for small to medium developers (we should be encouraging a diversity of landowners and developers to ensure diversity of building types and sizes) There are far too many development controls - makes development not feasible and may stifle design and outcomes 	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	

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				<p>5.Do you think the proposed tier system !or building height and plot ratio limits In Schedule 9B of proposed Amendment No. 61 are appropriate? - Yes</p> <p>6. Please provide a reason for your answer</p> <ul style="list-style-type: none"> • Tangible \$ contributions for public benefit is good (however we don't want the money being washed away into ordinary council operations - so would like more certainty around how Council chooses to allocate it - or allow the private sector to fulfil this requirement in-kind - as this will happen in a more timely manner with less red tape) • The height down Mill point Rd towards the city (North End of Mill Point Rd) is FANTASTIC _ and shows that height has been allocated and is encouraged in the best areas - areas that are walkable and areas where people want to live - not just an exclusive few • More height and more plot ratio opens the area to more people, more diversity of housing, more buzz, more density, which is great for local businesses and vibe. Would be great to have enough local businesses to 'not need to leave south Perth' to access services. • The tier system may make it a bit blocky though – whilst generally supporting it, it would be good to have a bit of variety. • Would like to see more height + plot ratio + Mill Point and Mends precinct+ including 165 Mill Point Rd + 163 Mill Point Road into the ACP • Street level appeal + activation is more important than height and size. 		
				<p><u>Podiums</u></p> <p>1. To what extent do you support the requirements for podiums in Schedule 9B of proposed Amendment No. 61? - Neutral</p> <p>Objective i. – Strongly support</p> <p>Objective ii. – Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Support</p> <p>2. To what extent do you support the requirements for podiums in Schedule 9B of proposed Amendment No. 61? - Neutral</p> <p>3. What changes would you suggest to the requirements for podiums in Schedule 9B of proposed Amendment No. 61?</p> <ul style="list-style-type: none"> • 4m rear setbacks should be discretionary/variable (more outcomes focused) as it may create dead pockets at the backs of building and/ or can reduce flexibility resulting in a poorer 	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. There is no requirement for any property to provide a mid-block link or pocket park. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be</p>	

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				<ul style="list-style-type: none"> For example, 64 Mill point Rd may be better off with a larger pocket park at the front and no rear setback (the rear setback is not useable to the public and that particular site is surrounded by driveways (to old and new strata buildings) to side and rear so the 4m setback does not fulfil the purpose it its intended, it merely adds another 4m dead pocket. (this site also has huge front setbacks under the new ACP so this is just decreasing the design flexibility for the street, without adding amenity) 8-9 metre setback on Mill Point Rd are too large Support the podium site cover – this is better control than prescriptive setbacks. 	<p>undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p> <p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p><u>Towers</u></p> <p>1. To what extent do you support the objectives for tower setbacks and separation In the draft ACP?</p> <p>Objective i. – Support</p> <p>Objective ii. – Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Strongly support</p> <p>2. To what extent do you support 1he objectives for tower floorplate size in the draft ACP? - Support</p> <p>Objective i. – Support</p> <p>Objective ii. – Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Support</p> <p>3.To what extent do you support the requirements for tower setbacks In Schedule 9B of proposed Amendment No. 61 - Support</p> <p>5. To what extent do you support the requirements for lower floor plate area In Schedule 9B of proposed Amendment No. 61? – Neutral</p>	Comment noted	
				<p><u>Design quality</u></p> <p>1. To what extent do you support the objectives for design quality In the draft ACP?</p> <p>Objective i. – Support</p> <p>Objective ii. – Support</p> <p>Objective iii. – Support</p>	Comment noted	

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				<p>Objective iv. – Support</p> <p>Objective v. – Neutral</p> <p>3.To what extent do you support the requirements for design quality In Schedule 9B of proposed Amendment No. 61? - Neutral</p> <p>4.What changes would you suggest to the requirements for design quality In Schedule 9B of proposed Amendment No. 61?</p> <ul style="list-style-type: none"> All developers encouraged to provide high line links. 		
				<p><u>Additional Development potential and public benefits</u></p> <p>1. To what extent do you support the objectives of the draft ACP?</p> <p>Objective i. – Support</p> <p>Objective ii. – Neutral</p> <p>Objective iii. – Neutral</p> <p>Objective iv. – Support</p> <p>Objective v. – Neutral</p> <p>2.Public benefit contributions may be used to fund the following Infrastructure and community facilities. Please rank the list below In order from highest priority (1) to lowest priority (6),</p> <p>1. Transport infrastructure</p> <p>2. Placemaking initiatives</p> <p>3. upgrades to Public open space</p> <p>4. community facilities</p> <p>5.Streetscape and public realm upgrade</p> <p>6 Street trees and landscaping</p> <p>3.Further to question 2 above, what other Infrastructure and/or community facilities do you think should be funded using public benefit contribution?</p> <ul style="list-style-type: none"> Train Station Water Cats and increased Ferry focus Electric Vehicle infrastructure (including provision for buggy paths in certain precincts and along dedicated paths on the foreshore) Bike paths High lines and elevated links to publicly accessible spaces. <p>4.To what extent do you support the requirements for approval of additional development In Schedule 9B of proposed Amendment No. 61? - Neutral</p>	Comments noted	

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				<p>5.What changes would you suggest to the requirements tor approval of additional development In Schedule 9B of proposed Amendment No. 61?</p> <p>If Developers are able to, then they should be permitted to provide onsite benefits in lieu of the developer contribution, e.g. if a developer provides a pocket park or a high line/green link through or between their development then they should be able to do so' 'in-kind' instead of in\$.</p>		
				<p><u>Bicycle and Car Parking</u></p> <p>1.To what extent do you support the objectives for bicycle parking and end of trip facilities in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. – Strongly Support</p> <p>Objective iv. – Strongly Support</p> <p>2.To what extent do you support the objectives for vehicle parking and access in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. – Strongly Support</p> <p>Objective iv. – Strongly Support</p> <p>3. To what extent do you support the requirements for bicycle parking in the draft ACP.- Support</p> <p>4. To what extent do you support the requirements for vehicular parking in the draft ACP.- neutral</p> <p>5.Do you have any general comments about bicycle and car parking in the draft ACP?</p> <ul style="list-style-type: none"> • Car sharing concessions are highly commended • There should be no minimum car parking for Residential developments (only maximums) • Reciprocal car parking should be encouraged • Student housing and Short Stay-should have no minimum bays only maximums (there is no maximum allocated) • Electric Vehicle Charging -has this been considered? Where is it factored into future [proofing new developments?) 	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p><u>Movement and Access</u></p>	Comments Noted	

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				<p>1. To what extent do you support the objectives for the local road network In the draft ACP?</p> <p>Objective i. –Support Objective ii. –Support Objective iii. –Support Objective iv. – Strongly Support</p> <p>2. To what extent do you support the objectives for public transport in the draft ACP?</p> <p>Objective i. – Strongly Support Objective ii. – Strongly Support Objective iii. – Strongly Support</p> <p>3. To what extent do you support the objectives for pedestrian and cyclist movement In the draft ACP?</p> <p>Objective i. –Support Objective ii. –Support Objective iii. –Support Objective iv. –Support</p> <p>Do you have any general comments about the objectives for movement and access In the draft ACP?</p> <ul style="list-style-type: none"> • Would love to see a dedicated electric golf buggy area in Mill Precinct that connects those apartments to the foreshore and Mends St in a safe manner. • Would like to see highlines and elevated green walking routes over roads e.g. Labouchere and Mill Point and barriers in between developments e.g. Linking retail and rooftops/podiums with walkable plant/green highlines. 		
12	19 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
13	9 & 18 July 2019	Feedback Form & Email	Not support	<p><u>Feedback form</u></p> <p>Keep building heights to no higher than the Reva apartments. It changes all the guarantees of views to the city which I had paid a premium for.</p> <p><u>Email submission</u></p> <p>Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1</p>	As per Submission 1 response	ACP 11 & 12
14	18 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1.	As per Submission 1 response	ACP 11 & 12

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14	22 July 2019	Email	Not support	<p>Submitter understands that the City of South Perth have a plan to increase the building heights limits on the foreshore from 25m to 37.5m from Fraser Lane to Mends Street.</p> <p>Our unit was strongly and heavily marketed that there will be a future clear view line of 25m from the 10th floor upwards. We have paid a huge premium for our unit as we were guaranteed this.</p> <p>The City of South Perth should have advised prior to the settlement period of the Aurelia purchasers that there is such plan to increase the height limitations on the foreshore. We purchasers would have not settled on the premium that was to guarantee our future clear line view of the Perth City. There is a clear lack of transparency and also ethical and moral obligations exercised by the City of South Perth in regards to this.</p> <p>Request the City should not approve the height limitation to 37.5m. It will heavily affect the price of apartments nearby.</p>	As per Submission 1 response	ACP 11 & 12
15	22 July 2019	Letter	Support	<p>Submission relates to specific narrow lot on South Perth Foreshore.</p> <p><u>Land Use</u></p> <p>Land use 'High Level Residential Aged Care Facility' is requested to be changed from D use to P use.</p>	Aged or Dependent Persons' Dwelling is listed as a 'D' use in all character areas. It is not recommended to change the permissibility of these uses, as this provides for some flexibility in approving the use, whilst also providing for control over development.	ACP – 2, 6, 9, 11, 12, 25 A61 – 13-19
				<p>Mixed use development is inherently a permitted use as it is expected in the Mends area so should be changed from D to P.</p>	Mixed Use development must be considered in context of the impact on the surrounding area. Such discretion provides for some flexibility in approving the use, whilst also providing some control over development.	
				<p><u>Building Height</u></p> <p>Request that land in the middle of our lot be shaded medium high as per peninsula site.</p>	Comment noted. A large number of submissions requested a reduction in the typology for the subject site (see Submission 1). It is not recommended to change the typology of the subject site.	
				<p><u>Podium</u></p> <p>Nil setback on Harper terrace should be permitted as per Map 3. Table 3 should not be allowed because of the precedent of existing buildings. This will allow consistence of canopy cover building frontage/ street scape</p> <p>Street setbacks to Sth Perth Esplanade at 3 metres should be reduced to Nil to allow a connection with the property to the East which has a Nil setback, and will allow a prominent corner design.</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
				<p><u>Podium height</u></p> <p>Request for Podium Height to be increased to 13.5 Metres.</p>	Comment noted. A 3 storey podium helps to provide a human-scaled interface with the street and provides sufficient opportunity for above-ground carparking if that is desirable for the development.	

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				<p><u>Tower Setbacks</u></p> <p>Enable architectural features such as sun shading devices and cantilevered balconies within the specified setback areas.</p>	Comment noted. Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.	
				<p><u>Maximum Tower Gross Floor Area</u></p> <p>It is also requested that the maximum gross floorplate area where tier 2 additional building height is to apply is increased from 30% to 40% in the Mends Character area. This is to provide greater flexibility in design and enhance the feasibility of development in these key areas. Also suggested the wording is changed to suggest that this is only for floors above previous maximum level.</p>	Tower floorplate area limits have been developed to ensure that all buildings adhere to the principle that if a building is taller, it must be more slender in proportion to the overall lot size and have more space around it. This helps to maintain opportunities for view corridors between buildings, minimise overshadowing and limit building bulk. It is not recommended to increase tower floorplate area limits.	
				<p><u>Plot Ratio</u></p> <p>Plot ratio be increased for Tier 1 additional height be increased to tier 2 level.</p>	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Plot ratio limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Plot ratio limits are not recommended to be increased.	
				<p><u>Design Quality</u></p> <p>With respect to design quality, we do not agree with the requirement under the draft Amendment to undertake a competitive design process between at least three architectural firms in order to qualify for Tier 2 development requirements. This is considered to be an onerous requirement regarding cost- efficiency and feasibility of a project. It is reasoned that the City's Design Review Panel should be consulted regularly throughout the design process to ensure the project architect is able to achieve "excellent" design outcomes, eradicating the need for this provision.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However, policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				<p><u>Approval for Additional Development Potential</u></p> <p>We do not agree with the proposed methodology for determining whether a development is eligible for additional building height and plot ratio. Specifically, we object to the requirement for a public benefit contribution to the value of additional plot ratio or building height. This is because there is no certainty as to how this money will</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and</p>	

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				<p>be utilised by the local government and ultimately, will result in higher house prices as the cost will be passed on to the consumer to cover increased project costs.</p>	<p>the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tying system.</p>	
				<p><u>Minimum Non-Residential Plot Ratio</u></p> <p>The draft ACP, although a due regard document, sets a minimum non-residential plot ratio requirement of 1.0 for the Mends Character area, relevant to the subject site. It is reasoned that this requirement should be reduced to 0.5 as the existing provision of 1.0 is unreasonably onerous on development.</p>	<p>Section 3.1.4 of the draft ACP states that the provisions are to provide for growth in local services and employment opportunities. The provisions only relate to Mends and Richardson Character areas and combine with preferred uses at ground level to provide activation.</p> <p>There is opportunity to consider provisions to allow the development of some floors to convert at a later stage to non-residential uses. This could be mechanisms such as minimum floor heights for areas that would otherwise be required to be committed to commercial requirements.</p>	
				<p><u>Dwelling Diversity</u></p> <p>It is requested that the minimum percentage requirements for single bedroom dwellings and dwellings with three or more bedrooms be removed. Ultimately, development should respond to the housing market, and demands in the locality. Housing diversity is imbedded in the provision objectives and therefore specific percentages are considered unnecessary.</p>	<p>Comment Noted. Housing diversity requirements are intended to support the growth of a range of housing types to provide choice. It is not recommended to remove dwelling diversity requirements.</p>	
				<p><u>Street Interface</u></p> <p>It is unclear why individual ground floor tenancies should be restricted to between 6 and 9 metres. Tenancies greater than 9 metres wide, such as large cafes or restaurants can effectively activate streetscapes whilst a variety of materials and architectural features can be used externally to provide visual breaks in facades, achieving the desired design response. The space and layout of tenancies should ultimately be decided by functionality. For this reason, it is requested that this provision restricting tenancy width be removed.</p>	<p>Retail and commercial units are to be articulated with a width of between 6 and 9 metres in active streets to ensure variety and a human scale are maintained in the street interface. This contributes to creating an active pedestrian-friendly environment.</p> <p>This requirement is included in the draft ACP and so can be varied if there is sufficient justification that the objectives and desired outcome will be achieved in an alternative way.</p>	
				<p><u>Floor to Ceiling Height -</u></p> <p>It is noted that the Floor to Ceiling heights outlined in the draft ACP are generally consistent with SPP7.3. SPP7.3 also states however, that for residential development, non-habitable rooms can have a minimum floor to ceiling height of 2.4 metres. It is requested that this provision be added for consistency.</p>	<p>The provisions of the proposed Amendment No. 61 and objectives of the draft ACP provide adequate discretion for development that can deliver on the amenity requirements. The provisions of SPP 7.3 are similar but not specific to the South Perth activity centre.</p>	

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				<u>Car Parking Provision</u> it is reasoned that the minimum non-residential parking requirement of 2 bays per 100m2 net lettable area be reduced. The requirement to provide non-residential floorspace and accompanying parking is a cost encumbrance on development, especially given the sites accessibility, with foot traffic predicted to bring a large proportion of business to ground floor tenancies.	The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. It is also important to ensure that a minimum amount of parking is required to adequately service development. Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.	
				<u>Access to On-Site Parking</u> Section 4.3.8.2 of the draft ACP outlines that crossovers to on-site parking shall be limited to one per development. This provision however has significant implications on the ability for developments to accommodate on-site waste collection. It is noted that on-site waste collection is a desirable outcome for developments. However, it is also desired that on-site waste collection areas be accessed via a separate crossover in order to minimise disruption to residents. This offers efficiencies in the layout of ground floor car parking and circulation areas and improves access for waste collection vehicles, particularly for corner sites. Given the conflict between the two desired outcomes, it is recommended that a provision that enables a separate crossover for servicing and waste vehicles, or alternatively/additionally, contemplates more than one crossover for corner sites, be incorporated into the draft ACP.	The suggestion that it may be desirable for sites with more than one street frontage to provide access from more than one frontage has merit. There are a number of reasons why more than access point may be desirable, particularly on larger sites, including to manage access to parking and waste collection areas within buildings. It is recommended to modify the relevant development requirement in Part 1 of the ACP to reflect this suggestion.	
				<u>Provisions supported</u> Formally support 65 The South Perth Esplanade being included in the Mends Character Area is it creates a logical demarcation between the Mends and Mill Point Character Areas. It creates a normalised boundary parallel to Harper Terrace. We believe this is both logical and good planning.	Comment noted. Some boundary amendments are recommended to respond to broader feedback and the recommendations of the Stakeholder Reference Group and the Community Panel.	
16	24 July 2019	Letter	Support	Requesting a nil street setback for Harper Street calling on justification from areas of Creating Pedestrian amenity, Vision for the Mends character area and role of Harper Terrace.	Retail and commercial units are to be articulated with a width of between 6 and 9 metres in active streets to ensure variety and a human scale are maintained in the street interface. This contributes to creating an active pedestrian-friendly environment. This requirement is included in the draft ACP and so can be varied if there is sufficient justification that the objectives and desired outcome will be achieved in an alternative way.	
17	24 July 2019	Letter	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1.	As per Submission 1 response	ACP 11 & 12
18	21 July 2019	Letter	Not Support	One option for the South Perth Activity Centre Plan to be considered by the City because it is equitable and fair to owners and also provides a sensible solution to overcome many arguments and a way forward that will give the planners and Councillors some comfort to progress their Plan. It is suggested the Hillside area have	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.	A61 - 11

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				<p>its height lifted as per the dark blue level along Mill Point Road and other areas.</p> <p>We don't agree with the population predictions.</p> <p>We suggest the light green areas as designated on the attached plan be extended to Mends Street and that the area heights be lifted remain 17.5m.</p> <p>We also suggest setbacks from front of properties be in the range of 9 to 12 m.</p>	<p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p> <p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p> <p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p> <p><i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i></p>	
19	24 July 2019	Letter	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12

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20	24 July 2019	Letter	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
21	24 July 2019	Letter	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
22	24 July 2019	Letter	Not Support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
23	24 July 2019	Letter	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
24	21 July 2019	Letter		As per submission 18	As per Submission 18 Response	
25	8 July 2019	Feedback Form	Support	<p>Leave as the maximum height previously agreed and do not increase the height for the foreshore.</p> <p>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.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	
26	24 July 2019	Letter	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
27	22 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
28	22 July 2019	Email	Not support	<p>The Basis for Planning for these documents is Flawed</p> <p>‘targets’ will often be set from above by the powers that be and they will sometimes be based upon ill-founded beliefs of what is possible in practice. That said, the people at ground level who are charged with the responsibility of achieving those targets need to plan to achieve the goals set for them in a logical and fact-based manner.</p> <p>In civic planning terms, failure to do so can result in damage to an area’s environmental condition; its residents’ quality of life; their financial well-being; and can have wider negative ramifications for the surrounding communities. Most importantly, when logical fact</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. 	ACP – 22, 23

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				<p>based planning shows assigned targets are unrealistic, then civic planners should strive to dispute any unrealistic targets and attempt to have them revised.</p> <p>In my opinion, the City of South Perth (CoSP) has failed to undertake the planning duties they have been charged with by the State Government in a logical and fact based manner over a long period of time. It has also failed to recognise and dispute targets that common sense alone show are unrealistic.</p> <p>The draft South Perth Activity Centre Plan (ACP) contains numerous instances that support the argument that the basis for planning in the CoSP is flawed. One of the best examples of this is the total shambles that exists in the various draft documents when it comes to new dwelling targets. Viz:</p> <p>The draft CoSP Local Planning Strategy (LPS) summary document indicates on page 5 that South Perth has been set a target under the State Government's "Perth & Peel @ 3.5m" plan (P&P3.5) of 1% of the total new dwellings planned of 124,000 by 2050. On the face of it that number would be 583 new infill dwellings (i.e., the 1% attribution times the overall target of 124,000 new dwellings by 2050, times the 47% expectation of new dwellings from infill, rather than infill plus greenfield expansion.)</p> <p>However, on the very next page we are told that that the CoSP's forecasted new dwellings between 2016 and 2031 are "in line" with the State Government's targets for the CoSP, as outlined in their P&P3.5 target (i.e., LPS forecast of 4,783 versus P&P3.5 target 4,700). From the chart provided we can also discern that the CoSP is forecasting 9,890 new infill dwelling by 2014, <u>1,590 more and 9 years earlier</u> than the 8,300 that the P&P3.5 is targeting for 2050. Clearly the draft LPS document is a mess and needs a thorough work over!</p> <p>Even if the numbers and the chart on page 5 of the draft LPS are incorrect and the 4,700 and 8,300 number on page 6 are in fact the correct targets that the CoSP has been set, they are not the relevant numbers for the ACP as it is only one part of the CoSP. The ACP documents indicate that this area is planned to accommodate 27.8% of the CoSP's 8,300 new dwellings target by 2041 (an increase of 2309 new dwellings). The ACP also indicates that this area's population is planned to increase from 2,675 to 7500 over the same period, or from approximately 20% of CoSP's population to approximately 30%</p> <p>When the above population and new dwelling growth numbers above are considered in conjunction with the Scheme Amendment No.61 (SA61) building height amendments it is no surprise that significant building height increases are being proposed to accommodate what is an unrealistic population increase for the ACP area and in particular the Mill Point precinct of the ACP which is planned to bear the brunt of these increases.</p>	<p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	

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				<p>Why are these ACP dwelling and population forecasts unrealistic?</p> <p><u>Traffic Congestion will be chronic if SA61 is implemented</u></p> <p>For a start, the roads won't handle the extra traffic generated by a doubling of the Mill Point precinct's population and a likely similar doubling of northbound vehicles exiting the freeway, then using Mill Point Road. The roads don't handle this task that well today!</p> <p>The reality we face is that without putting new roads in the river, which will never be allowed to occur, traffic exiting the Mill point precinct of the ACP have only two points of egress, Mill Point Road (West) and The Esplanade, the latter via either Harper St, Mends Street, or the lane behind Coco's, which all lead to the same three exit roads from the Peninsula as does Mill Point Road (West). These Peninsula exit roads being the Freeway north and southbound on-ramps, Labouchere Road and Mill Point Road (East).</p> <p>Traffic congestion will be chronic. For years planners have resisted all encouragement from ratepayers to have a cumulative study undertaken of the impact on traffic flows of the various developments approved and proposed. They know full well that any competent study that took in the cumulative impacts on traffic flows would put a huge spotlight on the problem they are hiding.</p> <p>Even now in the ACP they continue their efforts to hide the problem by continuing to propose that new development are only required to provide that developments their individual impact on traffic. More dishonestly, every map in these documents shows the northbound freeway off-ramp as ending in the river next to the narrows bridge or is not shown at all! This duplicity allows them to portray Mill Point Road (West) as a quiet suburban street, rather than it being this, <u>plus a key freeway exit</u>, in reality.</p> <p>At present, when the lights at the Mill point Road (West) and Labouchere Road intersection are set at their shortest interval time, which is all too often, then on average two vehicles turning right to enter the freeway go through on the green, two vehicles go through on the amber and one vehicle goes through on the red. People are frustrated beyond normal caution and as every skyscraper is built in the Mill Point precinct of the ACP, the situation is going to get much worse.</p> <p>The only entity that wants radical urban consolidation that I can identify is the United Nations. Other entities who support these aims can all be tied back to the UN via that entity's various sponsored groups. Through its world-wide local government network it has promoted urban consolidation for decades, along with the elimination of private vehicles. The ACP is totally in line with United Nations policy even to the point of including arrogant nonsense about the impacts of climate change. The CoSP and the State Government also see themselves as winners here, but when the costs of inept and warped planning come home to roost in future</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	

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				<p>decades, they will both be undoubtedly big losers. The problems created will be virtually unfixable and areas such as the Mill Point Road precinct of the ACP will become treeless wind ravaged canyons with little street life and degrading properties.</p> <p>When you look who benefits from these proposals the only answers is the property developers. They want to build higher, build shoddier, make their profit and exit before the problems become obvious to all. They have zero interest in the liveability of the area once they have exited. The mess they created in the last building boom is only becoming more widely understood now with even the better built buildings on the Peninsula having to have expensive remedial works to redress building faults that could have been prevented given reasonable care upon construction.</p>		
				<p><u>The water-sodden sandspit that underlies the Mill Point precinct of the ACP will not cope with the development proposed</u></p> <p>All extant buildings on the Peninsula suffer cracking caused by seasonal fluctuations in the underlying water table. These cracks open and close at different times of the year. Doors that open readily for six months of the year stick for the other six months. The movement is not as bad as it is for buildings built on clay soils, but it is not to be ignored, especially if you are planning to convert the Mill Point Precinct area into a mini-Manhattan!</p> <p>Obviously, the better a building has been constructed the less it suffers these problems. However, despite how well a building is built, the higher it is the worse its situation will be, particularly on the highest floors. For example, even a building on The Esplanade what was purported to be of first class construction during the mining boom is today undergoing major remedial works. Because movement in the structure has breached protective membranes (that hopefully were in place) on the roof and on balconies allowing water ingress to areas below.</p> <p>You can argue that better construction methods are the answer, but there are limits to what can be done to prevent future problems if building are to be able to constructed to the heights proposed in SA61</p> <p>The experience to date with high rise developments on the Peninsula has already shown that multilevel underground carparks are extremely problematic and hence the developers and planners have resorted to promoting massive podiums to house the car parks. If developments such as those being proposed and potentially approved go ahead, then beautiful streets such as Mill Point Road (West) will become nasty wind-swept places that will be avoided by people on foot. Any attempt at so call ‘street life’ will be blown off the pavement by the winds funnelling down the canyons.</p> <p>When developers’ mouthpieces go on about it being natural for cities to develop the south side of their rivers (such as in Brisbane and</p>	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	

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				<p>Melbourne) they are making undue comparisons. Those areas are not sensitive, environmentally delicate sandspits! The CoSP planners know this full well and that is why they always show photographs of the Peninsula from Kings Park looking down Mill Point Road (West) or from a high vantage point looking the back opposite direction. Such photographs understate the height of buildings and hide the fragility of the sandspit.</p> <p>Compare the photographs in the various CoSP publications over the years with the (See full submissions). It was taken from a city building side on to Mill Point Road and has had just two buildings of the sizes proposed outlined on it. Clearly, if the ACP and SA61 are implemented there will be huge future negative impacts resulting from subsidence and annual movement, over and above those arising from any shoddy building practices.</p> <p>The Peninsula is not part of the City and should not be dealt with by CoSP planners as if it is!</p>		
				<p><u>The forecast population increases are not soundly based</u></p> <p>The LPS, ACP and SA61 are all based upon forecast population increases that far exceed those published by entities who do not have a vested interest in development in the proposed activity centre. Two cases in point are the much lower population increase statistics published by the Australian Bureau of Statistics and the WA Planning Commission. There is huge risk in ignoring independent forecasts that are orders of magnitude in difference. Starting planning exercises from the standpoint of what you want to have happen and then generating figures to support this is not competent planning.</p> <p>When you consider all of the above with the lack of a proper housing analysis exercise, plus the incomplete and half-baked draft LPS exercise, then any confidence in the draft ACP and SA61 documents becomes completely compromised.</p> <p>Does the proposed activity centre meet the requisite criteria for such an entity?</p> <p>When you focus in on the ACP area population forecasts in the document, it seems apparent the aggressive population increase estimates have been inflated to try to justify a South Perth train station, which in turn can be argued strongly as being a requirement for declaring the area to be an Activity Centre in the first place.</p> <p>The chance of a station in the next 20 years is remote. <u>And remote for reasons that are way beyond that which could be resolved solely by the aggressive population numbers in the ACP proposal actually proving to be correct.</u></p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	

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29	18 July 2019	Email	Neither support nor not support	<p>The proposed redevelopment of the area surrounding the Bowling Club will have some profound effects on the operation of the Club. The main issues are:</p> <ul style="list-style-type: none"> • Overall Population Density • Parking • Traffic Flow • Shadows • Salinity 	Comment Noted	ACP – 10, 11, 12, 17, 19, 22, 23
				<p>We note the City wants another 851 residences by 2030. The rezoning allows for massive redevelopment of the area which potentially would allow for a huge number in excess of this requirement even going to 2050.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>Near Aurelia and others just built, there are areas where it is windy, cold, damp and totally unpleasant to walk through. It feels more like New York in winter!</p> <p>The amount of high-rise developments should be limited in both height and size so the area remains liveable for locals.</p>	Comment noted	
				<p>The Bowling Club has recently signed a 20 year Memorandum of Understanding with the City of South Perth to utilise 35 Car Bays in the Windsor Car Park on Thursdays and Saturdays and other special days by application. However, we currently have about 100 members. Our aim is to increase the number of full members to 130 over the next 4 years. The men play pennants on Thursdays and Saturday afternoons. Half play away but the half playing at home play visiting sides - thereby necessitating additional parking bays.</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	

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				<p>Currently it is a real juggle - although the City of South Perth have allowed us to use part of Lyall and Bowman streets lately. Recommendations</p> <ol style="list-style-type: none"> 1. More parking in the area to accommodate the growth in the number of visitors that will accompany the growth in the number of new residences. 2. Current car park beside the zoo on the other side of Windsor Park could be developed to a 3 or 4 storey car park without affecting the views or property values of all existing residences. 3. The current car park between Labouchere Road and Richardson Park could become Multi-storey also. 4. Bowling Club should be able to use Windsor Park for temporary parking on occasions. 	The development of additional parking to serve the Bowling Club may be investigated at a later date as/when need dictates.	
				<p>Accessing the Parking area beside the Bowls Clubhouse will become increasingly more difficult for members and visitors as traffic increases.</p> <p>If Civic Heart is built the entry/exit will be in Labouchere Road. Therefore to go to Perth those drivers will have to turn left into Mends Street and left again into Mill Point Road to access the current ramp to Perth.</p> <p>Recommendations</p> <ol style="list-style-type: none"> 1. A tunnel starting at the top of the hill in Mill Point Road which would go under Windsor Park, the Bowling Club, Labouchere Road and join the existing on ramp to the City. This would alleviate traffic problems on the Peninsula. 2. The Car park mentioned above, and the tunnel could then be integrated to let cars out of the car park to go direct to the City 	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				<p>Should Civic Heart be completed, the Bowling Clubhouse and Greens will be shadowed as a result. During summer the sun is higher and the affect would be less than winter. However, in winter when one is looking for that bit of warmth from the sun there is a good chance our greens and clubhouse will be in shadow and some days near darkness.</p> <p>Perth is the 3rd windiest City in the world. Highrise buildings will also create more wind tunnels in the area and make life more unpleasant.</p> <p>Recommend the height and width of new developments in the area be restricted to reasonable levels.</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p> <p>The ACP and Amendment No. 61 include a number of requirements to limit the size and bulk of new development including building height and plot ratio limits, podium size limits and tower floorplate area limits.</p>	
				<p>In 2018 our Bore salted up and became unusable. The City did fund the cost of installing two 3,000 litre tanks and connection to Scheme Water. The salt contamination occurred due to poor de-watering</p>	The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in	

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				<p>techniques used for the Aurelia development and transferring water to the Civic Heart site where overflows into the groundwater occurred.</p> <p>All future de-watering of all development sites should be strictly monitored by the City Planning Department.</p>	<p>certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				<p>On the flip-side, the Bowling Club will benefit from new developments in the area. As a Club we pride ourselves on the appearance of our premises and the friendly and social nature of our members both on the greens and in the Clubhouse. We see our Club as a place for new residents to enjoy as we do.</p>	<p>Comment noted</p>	
30	20 & 22 July 2019	Email and feedback form	Support	<p><u>Email submission</u></p> <p>Strongly <u>Support</u> the Building Height and Plot Ratio shown in Schedule 9B Map 2, with some further comment below on Plot Ratio and Building Height Measurement.</p>	<p>Comment noted</p>	<p>ACP – 27, 28</p> <p>A61 – 2, 3, 11</p>
				<p><u>Strongly Do Not Support</u> that any car parking and associated circulation space be calculated in the Plot Ratio Formula; this will force developers to build car bays wholly underground to be exempt from the Plot ratio calculation</p> <p>Five years ago my company submitted a DA for an 1800 square metres site in Hardy St and it required several hundred car bays, of which most were partially sunken as far down as possible without entering the water table. As the Character Area of Richardson and Mill Point is basically flat this puts owners at a distinct disadvantage compared with land owners in Hillside and some of Mends who are situated well above the ground water levels.</p> <p>In order to keep any ground water issues to a minimum and avoid the huge expense of wholly sinking several levels of car bays into the water table, partially sunken car bays should be excluded from the Plot Ratio calculation, or a favourable formula conceived.</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking.</p> <p>It is recommended that basements that are at least 50% (by volume) below ground level be excluded from plot ratio.</p>	
				<p>Referring back to the Map 2, I <u>Strongly Support</u> the Tiering of Height levels from the centre out, and with the creation of slimmer towers, it provides the viewing corridors enabling more views for residents, as well as ensuring the perception of depth when viewing South Perth from Nedlands, Applecross and the City.</p>	<p>Comment noted</p>	
				<p>The only area within the ACP that does not measure Building Height from Natural Ground Level is an area on the East side of South Perth Esplanade. I cannot see any developer practically wanting to build a Tiered development across any sewer line.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p>	

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				<p><u>I Strongly Support</u> Amendments 61's proposal that the measurement from Natural Ground Level be the starting point of the Building Height.</p> <p>Side and Rear setbacks should be applied to the residential area of Mends on the South Perth Esplanade. A reference should be made to the portions of land, at 97 and 99 the Esplanade that the COSP has noted as block 2 of each address, that they should only be used for car parking, pools and residential amenities of landscaping.</p> <p><u>Feedback forms</u> 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 Carwashes are an X, except in Hillside and Mill Point 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.</p> <p>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 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 upkeep if both the Mid-Block Links and Pocket Parks are introduced, the upkeep should be with the City.</p>	<p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p> <p>The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres. There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p> <p>It is not recommended to change the permissibility of these uses, as the current permissibility provides for some flexibility in approving the use, whilst also providing for control over development.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. The indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
31	22 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
32	22 July 2019	Email	Not support	<p>I believe the following areas need further explanation/inclusion in the plan before it is endorsed.</p> <p>PLANNING COMPLEXITY</p> <p>The proposed planning approach, that requires concurrent reading of a complex ACP/Amendment 61/ Support policies, is significantly more complex than the current (already complex) approach. Please advise the additional costs of review bodies, consultants and internal headcount to administer this? What extra training will be</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p> <p>Ongoing monitoring of the documents will be undertaken to assess emerging concerns. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p>	ACP - 11, 12, 19, 22, 23

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				<p>given to the JDAP representatives and the general public when development applications are to be considered?</p> <p>PUBLIC BENEFITS</p> <p>A more detailed explanation of how the public benefits approach has been determined (or who it has been modelled on), and where it has been successfully used, is required. Developer profits increase exponentially with height because the pricing of views is at zero cost to a developer.</p> <p>How have the following be determined:</p> <ol style="list-style-type: none"> 1. What proportion of notional developer profits the community should be entitled to 2. The basis of how this value should be split between cash and non-cash benefits. 3. The basis of how the benefits will be allocated throughout South Perth 4. The costs of administering this approach <p>In addition to the above there should be an assessment and tracking of public costs, on both a per-building and cumulative basis. Meaning the impacts on key infrastructure eg roads, power, water, parking etc. How will this occur?</p> <p>How are projected dwellings and costs and benefits reflected in forecast rates, better services and quality of life within South Perth over the plan period? This is the key measure whether the plan is delivering what the community wants.</p> <p>HISTORICAL PLANNING ISSUES</p> <p>How will this plan specifically address some of the historical planning issues obvious to the general community and most recently in various tower issues in Sydney and Melbourne? In particular how has the ACP addressed the following-:</p> <ol style="list-style-type: none"> 1. Water table issues experienced in various developments over the last 3 years 2. Residents being entombed by bigger buildings next door after being promised that that would not occur 3. Proper assessment of wind impacts. Your plan only assumes that gaps between buildings are all that is required to mitigate wind impacts. Heights of buildings are the prime cause of severity of wind impacts due to downwash effects. There does not appear to be any consideration of this anywhere in the documents. 4. Enforcement of building standards to ensure basic duty of care to existing residents during construction of large buildings and 	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the public benefit contributions system.</p> <p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant technical considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties. This will help to ensure that the amenity of neighbouring residents is appropriately considered.</p> <p>Wind impact assessments are required to be submitted as part of the development applications process.</p> <p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All</p>	

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				<p>post construction – there are many examples now in the Eastern States. Who will pay if any issues arise?</p>	<p>development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p>	
				<p>COUNCIL AND ADMINISTRATION</p> <p>The Council and its Administration have not worked together in a manner that gives the Community confidence that the overall planning process will deliver a simple and effective Town Planning Scheme. At the end of 2018 the Councillors unanimously agreed to review the fundamentals of the ACP planning assumptions. A few months later the Councillors unanimously agreed to proceed to advertise with minimal changes to those assumptions. An explanation of this 180 degree change in position will be required.</p>	Comments noted	
33	22 July 2019	Email & Feedback Form	Not support	<p><u>Email submission</u></p> <p>This ACP has, at its heart, some very good principles. We concur with all directions relating to street set-back, no podiums in residential areas, non-residential Plot Ratio, manageable traffic, variety of dwellings, appropriate density, quality of design, character areas, height limits, and the list goes on. Sadly, most of these objectives are not met, or only partly met, by the Plan.</p> <p>The WAPC classified this area as a District Centre.</p> <ol style="list-style-type: none"> 1. The process used in creating the ACP lacked breadth and depth principally due to the lack of action on prerequisite activities 2. It is based on a fraudulent possibly unlawful population forecast. 3. It overlooks immutable infrastructure deficiencies. 4. It fails to appreciate that some existing elements are worth keeping. 5. It avoids significant sustainability issues. <p><u>Certainty and Clarity</u></p> <p>This ACP does not provide certainty for the community. Some aspects of the plan are unnecessarily open to discretion. Many of the discretionary aspects serve only to increase profit for developers rather than work toward an orderly execution of the plan, and decidedly serve to promote maximum uncertainty.</p> <p>All wording in the ACP should be assessed for clarity.</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p>	<p>ACP – 7, 8, 17, 26, 27, 28</p> <p>A61 – 2, 3, 7, 8, 12–17, 20–28</p>

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				<p><u>Podiums</u></p> <p>Podiums are ‘inconsistent’ with Residential character areas.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				<p><u>Phased implementation</u></p> <p>If the plan is approved as is, developers will be able to get approval immediately for buildings of maximum height anywhere in the Activity centre. We believe a phased implementation is required to protect amenity and property values in character areas and limit early development to those areas clearly requiring redevelopment, with incentives to do so.</p> <p>There should be a focus on development of under-developed areas first.</p> <p>The ‘Tier 2 Additional Development Potential Available’ boundary should end at a line approximating Ferry Street. It is clear that the area north of Ferry Street is of a residential character and an outlier to the majority of the AC.</p> <p>It is also unnecessary for the effective execution of the density objectives to increase heights in the ‘Low’ areas.</p>	Comments noted	
				<p><u>Current and Future Character</u></p> <p>Setbacks in character residential streets should remain consistent with what they are today.</p> <p>The plan has delineated streets as those with set-backs (Character Streets) or zero set-backs. Where a set-back street abuts a zero-set-back street the plan allows zero-setback at the end of a character</p>	Comments noted	

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				<p>street. This is clearly counter to the rationale for a set-back street – and will allow blank wall ‘book-ends’ at the end of a street.</p> <p>The number of trees destroyed by development should be contra’d against the number planted.</p>		
				<p><u>Density does not include the zoo</u></p> <p>Including the Zoo as a ‘recreational space’ in density calculations is clearly disingenuous.</p> <p>Where the ACP aims for a desirable 30 dwellings per gross hectare is actually nearer 50 once the Zoo area is correctly removed.</p> <p>The intention of the density calculation is to provide a measure of amenity which is skewed by including invalid spaces.</p>	<p>The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.</p>	
				<p><u>3D modelling</u></p> <p>The 3D Scenarios provided in the current array of documents is way short of the expected build-out, they omit shadowing and fail to show areas of planned high-rise density - like the double spine of 20 storey buildings along each side of Mill Point Road north. More importantly they shows more of an asparagus patch than the realistic objective of a ‘cohesive skyline form’.</p>	<p>The City is investigating 3D modelling to enable better visualisation of new developments within current and future streetscapes. Simple forms of 3D modelling that show building envelopes without design parameters can be misleading and are not always an accurate representation of the future outcomes, especially where there are a number of possible future built form outcomes.</p>	
				<p><u>Traffic forecasts</u></p> <p>The Flyt report – ‘Transport + Movement Analysis’ is functionally valueless and certainly should not be used to make any vehicle movement decisions. It does not include any new modelling.</p> <p>There has been no inclusion of Mill Point Road Nth in the ACP (Flyt) vehicle movement studies.</p> <p>Forecast traffic results clearly show that the peninsula is not suitable for anywhere near the development being allowed for by the planners in this ACP.</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p>	
				<p><u>Public Benefit</u></p> <p>A Developer Contribution Scheme is an essential component of a good plan, so as to protect rate-payers funds and ensure costs are met by the appropriate party.</p> <p>We totally disagree that it is reasonable to develop buildings with NO benefit to the community. But if the developers actually get this astonishing concession, the community needs to know how the fund will be spent, and how they will be involved in these decisions.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area,</p>	

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					<p>and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p><u>Population forecasts</u></p> <p>The planners are basing their projections for the city based on a (flawed) population forecast rather than a consensus of the optimum vision for the design of the city going forward. They are setting out to cram as much density into a small space to satisfy developers ahead of the community, rather than optimise for the city of the future.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p><u>Train Station will not happen</u></p> <p>If the station does not eventuate, or does not in the life of the ACP, would this affect the ACP?</p>	<p>The future development of a train station has been incorporated into strategic planning for the area since the rail line was constructed in 2007.</p> <p>It is not known when a train station may be constructed, however a station would improve the accessibility of the area by public transport and would support higher urban densities within the activity centre.</p> <p>Longer term development in accordance with the draft South Perth Activity Centre Plan will support the construction of a train station. Although the development of the station is not a direct objective of the activity centre plan, the development controls and other actions identified in the plan are expected to strengthen the case for a station to be built.</p>	
				<p><u>Parking</u></p> <p>The requirement for parking spaces in serviced apartments is lower than normal residential. The meagre provision of parking spaces means that buyers will likely end up with no car space, and more street parking.</p> <p>The concept of unbundling parking spaces from apartments is short sighted. There is nothing in the plan which will preclude the</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	

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				<p>purchasing of an apartment without a parking space and having to park a vehicle in the street.</p> <p><u>Sustainability</u> The city should be aiming for higher minimum green star ratings – Four mentioned in the ACP is too low a hurdle. There should be NO building approvals unless providing sustainability certification.</p> <p><u>Public Realm</u> More consideration should be given to the holistic assessment of the Peninsula’s 'vista' from the public realm. Examples of poor views of buildings from the public realm provided.</p> <p><u>Miscellaneous</u></p> <ol style="list-style-type: none"> Note A61 zoning map 2 - area NE of zoo is white (ie not in the AC boundary) but contains a number of apartment buildings currently around 6 storeys. unsatisfactory vehicle management facilities Avoid negative impact of built form on the Zoo the plan will meet 2031 objectives well before that date The ACP uses SHOULD 70 times. Many of these validly so, but in a lot of cases this indicates the creation of even more uncertainty tasks still outstanding (additional studies and strategies) destruction of heritage increase the non-residential plot ratio requirements <p><u>Feedback form</u> Must be higher non-residential Plot Ratio. Despite plot ratio, heights must be limited in many locations to prevent uncertainty from amalgamating blocks</p> <p>There is no community benefit for allowing the developer to buy extra profit with NO benefits, especially since you don't even know how you would handle the slush fund. Could you use the money to build the train station?</p>	<p></p> <p>All development is to achieve and provide certification of at least a 4 star Green Star rating. This rating represents Australian best practice.</p> <p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>Comments noted</p> <p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area,</p>	

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					<p>and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>If a building cannot support sufficient parking without a podium, the height is limited to what it can support.</p> <p>If towers weren't on podiums they would be ok.</p> <p>The floorplate refers to the ground not a podium. Towers to the ground without podium.</p>	Comment noted.	
				<p>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.</p> <p>Green star must be part of quality, and it must be >5.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which is described as Australian best practice.</p>	
				<p>Shadow effects must be extended to the length of the shadow. The days of just affecting adjacent properties are long gone.</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	
				<p>This is atrocious. A developers benefit scheme - allowing the development 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 singularly unsuccessful in this to date, but rather than try harder you think up this 'bribe' system.</p> <p>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</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p>	

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				<p>what is already the responsibility of council to provide. Funds MUST NOT BE USED for a station.</p> <p>Minimise the scope to provide more certainty. Make the developer provide public benefit WITH the building. Don't set up a bribery methodology to enable developers to build maximum profit buildings.</p>	<p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>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.</p>	<p>Comment noted</p>	
				<p>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.</p> <p>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.</p> <p>If you were being altruistic, these objectives would be supported. But the objectives are sinister.</p> <p>Dropping the speeds will not help your ineffective simulations. It won't help the chaos you are going to create on the roads.</p> <p>These constraints are immutable, and the only way to avoid total lockdown is to limit density to what can be accommodated.</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>DO NOT expect any significant addition to green space, experience elsewhere refutes the hypothesis.</p> <p>Pocket parks in Melbourne have become grubby unsafe areas. You don't have the scope - this is a brown not greenfield.</p> <p>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.</p>	<p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
				<p>The intention is laudable - to provide a best design, but in what democracy should a landowner be told what he puts on his land?</p> <p>The only issues we have faced is the inability of the DRP to judge quality appropriately - mostly because the omit things like context. BUT since the WAPC have finally recognised the lack of ability of</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design</p>	

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				<p>local government to assess designs appropriately, they have announced a DRP which will replace them. This should obviate the need for this policy.</p> <p>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.</p>	<p>quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p>	
34	22 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 response	ACP 11 & 12
35	22 July 2019	Email	Not Support	<p>‘Bonus height’ requirements are unreasonable and unachievable due to onerous contributions.</p> <p>There are a range of performance based bonus criteria set out in Amendment 61 in order to achieve the bonus height. Our client has no objection to the majority of these criteria. However, we object to the ‘public benefit contribution’ because the contributions are excessive and there has been no demonstrated need or nexus for the contributions.</p> <p>If the City is seeking to pursue Amendment 61 notwithstanding our objections, then we request the following amendments are made:</p> <ul style="list-style-type: none"> • Clauses 8.1.4, 8.2 and 8.3 are deleted from Amendment 61. • The corresponding requirements are deleted from the draft ACP. • The public contribution requirements are revisited as part of a Development Contribution Plan with contributions capped at \$2,500 – \$3,500 per dwelling. 	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	ACP – 9 A61 – 14-19
				<p>Amendment 61 effectively reduces the permissible height for the subject site from five storeys to four storeys. This is height is unreasonably low and is inconsistent with the objective of increasing the number of dwellings in the precinct.</p> <p>If the City is seeking to pursue Amendment 61 notwithstanding our objections, then we request the following amendments are made:</p> <p>At a minimum (to ensure existing five storey allowances are being retained):</p> <ul style="list-style-type: none"> • The base height for the ‘low’ height type category on Map 2 is increased from 14.4m to 17.5m (in order to permit five storeys at 3.3m per floor plus 1m to account for the need to develop above natural ground level). 	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The Low typology is intended to maintain a low scale interface with the foreshore, consistent with the structure of heights stepping down from the centre of the ACP area towards the foreshore.</p> <p>It is not recommended to increase the building height limit for the base (14.4m) or Tier 1 Additional Building Height in the low height type from the advertised 17.5m.</p>	

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				<ul style="list-style-type: none"> The Tier 1 bonus height for the 'low' height type category on Map 2 is increased from 17.5m to 20.8m (one additional storey). <p>Ideally (to facilitate a more appropriate transition from surrounding sites where 8-16 storeys are achievable): Modify the permitted height on South Perth Esplanade between Frasers Lane and Queen Street to the 'low-medium' category.</p>		
				<p>The street setback requirements are onerous and should be modified to allow no more than a 10m setback to balconies (as is currently permitted).</p> <p>Owing to the above, the street setback requirement should be modified to either:</p> <ul style="list-style-type: none"> Clarify that the 12m setback requirement does not include balconies; OR Modify the setback requirement to South Perth Esplanade to 10m (for both tower and podium) 	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>It is recommended to review street setback requirements throughout the ACP area to ensure that they support the relevant character area and streetscape objectives.</p>	
				<p>Removing discretion from setback requirements creates inflexible design outcomes</p> <ul style="list-style-type: none"> If the City is seeking to pursue Amendment 61 notwithstanding our objections, then we request the following amendments are made: <ul style="list-style-type: none"> The side setbacks requirements are modified to 3m above the second storey (for the Mill Point Precinct); and/or The side and rear setback requirements are modified such that they are assessed as an average setback instead of a minimum; and/or <p>The amendment is modified to permit the exercise of discretion on side and rear setbacks.</p>	<p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
36	22 July 2019	Email	Neither support nor not support	<p>South Perth has two main tourist destinations: Perth Zoo, and the waterfront and foreshore area surrounding the Mends Street ferry.</p> <p>The Mends Street ferry terminal is currently undergoing much needed upgrades anticipating future growth for the area. This is an important step for improving the initial point of arrival. We also note plans to facilitate a better link from the ferry area to the Zoo which will ensure a better quality of travel experience between the two destinations.</p> <p>Additional work should be undertaken to activate the waterfront and foreshore areas around the Mends Street ferry terminal as a tourist destination in its own right.</p> <p>The benefits of making Elizabeth Quay a tourist destination in its own right provides an excellent precedent. Elizabeth Quay not only</p>	<p>The Connect South project to improve the streetscape of Mends Street and the area around the ferry terminal is currently under construction and is outside the scope of the draft ACP and proposed Amendment No. 61.</p> <p>The connection between the South Perth Foreshore, the Zoo and Elizabeth Quay is recognised.</p>	A61 - 6

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				<p>serves as a transit point to the CBD but now attracts residents and visitors to enjoy a quality waterfront asset. This results from significant surrounding developments that include a mix of residential, hotels, commercial and retail outlets.</p> <p>The result of the above is that visitations between Elizabeth Quay and South Perth have increased dramatically. Therefore, we see this as an opportune time to activate the areas which surround the Mends Street ferry. To that end, the draft South Perth Activity Centre Plan and Amendment 61 can now play a vital part in invigorating sustainable developments around the ferry.</p> <p>The Department of Transport, earlier this year, assessed ferry services, especially between Elizabeth Quay and the Mends Street ferry. It now recommends 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.</p> <p>TCWA is aware that South Perth has a foreshore plan. Two of its priority nodes are the Mends Street node and the Mends Street Beach node (with a beachfront between Mends Street and Frasers Lane). We also note that in the draft Activity Centre Plan, streets on these nodes are earmarked to be active and semi-active rather than passive. However, to date there has not been any significant proposed waterfront mixed-use/tourist developments by the foreshore on the above nodes around the ferry in South Perth</p>		
				<p>We strongly urge the implementation of the South Perth Activity Centre Plan and Amendment 61 be supportive of transit-oriented development outcomes around the ferry. It would be very disappointing if there are any implementation elements prohibitive of such outcomes.</p> <p>In particular, it has come to our attention that one of our members, The Peninsula, will be disadvantaged. The Peninsula has for many years operated serviced apartments and contributed to tourism in South Perth. The Peninsula hosted approximately 26,800 visitor nights in South Perth in 2018. TCWA estimates that these visitor nights in South Perth generated \$6,550,000 in direct visitor expenditure in the area, creating an estimated 44.4 direct and indirect full-time equivalent jobs.</p> <p>We understand that the draft implementation of the Activity Centre Plan and Amendment 61 would mean that The Peninsula site would be in a new planning area which prohibits serviced apartments. This seems counterintuitive. We support their request that their site be in the mixed-use Mends character area.</p> <p>We also understand that The Peninsula serviced apartments is requesting it is given a fair opportunity to achieve transit-oriented development outcomes, since it is only 200m to 300m from the ferry. It is requesting, in order to be on a “level playing field”, that at least a</p>	<p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	

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				part or all of its site be given the highest density planning outcome that is available to a number of other properties in the Activity Centre Plan. We find this to be entirely reasonable and consistent with the desired outcomes for the area. We strongly support what they are requesting, given that their site is a strategic candidate for transit-oriented development, is able to provide public benefits if given the incentives to do so, and is able to contribute further to tourism.		
				A review of the mixed-use Mends character area shows that the developable land is significantly reduced when the Zoo is excluded. It is also apparent that the Mends character area does not include the Mends Street Beach node and the foreshore properties which face it. Our view is that this would be a regrettable outcome and urge that the Mends character area be logically extended westward to include such foreshore properties.	<p>The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.</p> <p>The Mends Street beach node is fully accessible to all members of the community and changing the boundary of the character area will not make it any more or less physically accessible.</p>	
				With respect to the Mends character area itself, our recommendation is for there to be encouragement and certainty for investors wishing to develop hospitality assets in South Perth. As such, we recommend that all of the following uses be permitted (not merely discretionary). These being: Hotel, Mixed Development, Serviced Apartment, Tourist Accommodation, and Tourist Development. We note that Bed & Breakfast Accommodation is already permitted.	It is recommended that discretionary uses provide for flexibility in approving the use, whilst also providing for control over development.	
				<p>It has come to our attention that there has been a small but vocal group of dissenting voices from parts of the South Perth community, purportedly concerned about increased density and traffic congestion along Mill Point Road where some developments had been proposed. A simple way to alleviate this problem is to redistribute density back to where it should occur - around public transit facilities and ideally where open space developments can occur. In the case of South Perth, the existing strategic transit facility is the ferry. Its position has become even more important given the developments and activity at Elizabeth Quay.</p> <p>The waterfront and foreshore areas surrounding the Mends Street ferry are public assets. As such, they need to be considered from a broader perspective - to maximize their amenity for more to use, rather than merely preserving their amenity for an existing few. TCWA believes that now is the right time to start planning ahead for these high-quality public assets. Transit-oriented development opportunities around the ferry, around its surrounding waterfront and foreshore areas, should be maximized and fully supported.</p>	The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal. Areas of low height typology provide a human-scale interface with the foreshore and allow for taller buildings located closer to the centre of the ACP area to be visible behind.	
37	18 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Same as submission number 1	As per Submission 1 response	ACP 11 & 12

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38	22 July 2019	Email	Not support	<p><i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>THIS PLAN IS SUFFERING AN IDENTITY CRISIS.</p> <p>It does not know if it's a plan to gain a station, a real activity centre, an infill project, but more likely it appears to be hotch-potch of ideas to satisfy the very strong developer agenda.</p> <p>Major concern with this ACP is the unjustifiable increase in density, which leads to increased building heights, intrusive podiums in residential areas, minimal setbacks, extensive solar blocking, traffic congestion, reduced walkability and reduced tree cover.</p> <p>REMOVE THE UNCERTAINTY</p> <p>With so many allowances for 'discretion' in areas of height, bulk, setback, shadows, use, quality, impact etc. etc. it is implausible to say it improves certainty.</p> <p>Our very strong recommendation has been and continues to be, to wait and prepare the final scheme amendment 61 only when there is agreement on the ACP and then ensure the wording of any amendment is clear, consistent, definitive, decisive and not able to be misinterpreted.</p> <p>FLAWED LOGIC</p> <p>The opening summary in the ACP shows an estimation of dwellings to be expected by 2031 & 2041 - 809 additional dwellings by 2031 and then another 1500 by 2041. That more than meets the target for 2031.</p> <p>SOUTH PERTH IS NOT A CBD CENTRE</p> <p>No valid or relevant planning reasons that justify the excessive height increases over so much of the ACP area. The WAPC targets do not require this level of infill.</p> <p>South Perth is not part of the Capital city Area</p> <p>South Perth is not a Station Precinct</p> <p>POPULATION FORECASTING</p> <p>Use the reliable, relevant and verifiable ABS population forecasts and the WAPC dwelling targets.</p> <p>Lack of Pre Work</p> <p>The Residents of the peninsula want to see an optimum build out that could be accommodated without destroying the character and liveability, rather than a "maximum capacity" as is planned here.</p>	As per Submission 5 response	<p>ACP – 6, 7, 9, 11, 17, 19, 22, 23</p> <p>A61 – 2, 3, 6, 7, 8, 11–19, 20-28</p>

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				<p>Gaps and Red Flags</p> <p>Public Benefits Framework</p> <p>absence of a framework and strategy for how Public Benefit Contributions is to implemented</p>		
				<p>Other Development Requirements pg 41</p> <p>It is too late once the developments arrive. Cumulative assessments for at least 10 of the items in Table 5 should have been completed on the project build out before any decisions are made to agree to this level of density.</p>		
				<p>Key Performance Indicators</p> <p>concerns over that “steps toward gaining a Train Station ’ confirms that this increased density is directed strongly toward gaining a station that very few people in South Perth think is a good idea.</p>		
				<p>More needs to be done to encourage employment in the relevant areas</p> <ul style="list-style-type: none">• The non-residential plot ratio requirement is too low for the Mends areas – it should be compared to the entire floor space not the plot size• Incentives for entire commercial buildings should be included especially for Richardson• Mixed residential and commercial is proving very unpopular in many areas – all residential complexes should be allowed in Mill Point & Hillside• Incentives for Family Friendly Complexes should be included		
				<p>Connection to nature</p> <ul style="list-style-type: none">• some attributes around street trees, parks and setbacks are very encouraging, but there are still contradictions in Amendment 61 where the requirements would see a destruction of green spaces and the damage to the beautiful streetscape of Mill Point Rd Nth.• The setbacks on Mill Point Rd nth should be increased to 12-8 metres so they blend with the existing streetscape as has been done along the foreshore. Many of the current building along Mill Point Rd are setback 10-15 metres which has allowed the trees to flourish.• If you want to keep some tree cover, improve residential garden areas then remove podiums from residential areas – as was agreed to at the RobertsDay Forum		

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				<ul style="list-style-type: none">Developers agree that they prefer podiums purely for economic reasons - our beautiful streetscapes should not be sacrificed just to provide additional profit. <p>‘future forward approaches to sustainable living</p> <p>The logic used to extend the boundaries of the ACP to include the north end of the peninsula is flawed</p> <p>IMPACT ON ZOO</p> <p>REMOVE THE ZOO FROM DENSITY CALCULATIONS</p> <p>TAKE THE TRAIN OUT OF THE PLAN</p> <p>COMMUNIITY CONSULTATION HAS BEEN INADEQUATE</p>		
				<p>Element 1: Zoning, residential density coding and land uses</p> <ul style="list-style-type: none">Many of the Land Uses in Table 1 are contradictory to the Character StatementsHi-level Aged Care contradicts TPS6 stipulation and is opposite to any recommendations from aged care providers who condemned the placement of these facilities in such unsuitable locations.Why Student Housing? Is there any demand for it in the ACP area? Is it forecast? Is it viable?Local shops, bars, and retail should be X in Mill Point and Hillside. That sort of use should be directed towards Mends – maybe DC in Richardson.Office and retail should be concentrated in Mends and Richardson if you want to promote South Perth as a destination in order to justify improved public transport servicesIt is strange that Serviced Apartment are an X in Mill Point and Hillside given previous unequivocal support for such uses in Mill Point in the past.Tourist Accommodation and Tourist Development are DC in Mill Point and Hillside, but not Serviced Apartments. Serviced apartments surely would fall under the definition of a Tourist Development. What is the difference? Don’t leave this to a JDAP debate?	<p>Aged or Dependent Persons’ Dwelling is listed as a ‘D’ use in all character areas. It is not recommended to change the permissibility of this use, as this provides for some flexibility in approving the use, whilst also providing for control over development.</p> <p>Student Housing uses are proposed as a ‘P’ or ‘D’ use all character areas. It is not recommended to change the permissibility of this use, as this provides for some flexibility in approving the use, whilst also providing for control over development.</p> <p>Shop and Small Bar uses are proposed as an ‘X’ use in the Hillside and Mill Point character areas and ‘P’ and ‘D’ respectively in Mends and Richardson. It is not recommended to change the permissibility of these uses.</p> <p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	
				<p>Element 2: Building Height Limits</p> <ul style="list-style-type: none">The residents of the Peninsula have been very clear even in the formulation of the SPSP and Amendment 25 and again in the formulation of Amendment 46 that any dramatic increase in height should be south of Ferry Street. The new JDAP have consistently agreed with this.	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment</p>	

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				<ul style="list-style-type: none"> Included in the City’s reports and the submitted Amendment 46 for the SPSPP the City clearly expressed the view that the Mill Point area north of Judd Street had a unique and separate character to the rest of the SCA and should therefore be excluded from the SCA, thereby ensuring that the heights limits of 8 storeys would be maintained. The community overwhelmingly supported this proposal with more than 600 supportive replies. The city has not come close to receiving that amount of feedback for any other project. Nothing has changed in the Peninsula since that time and yet this plan is now predicated on the complete opposite assumption that the Peninsula's character is not worth preserving. The area to the north is a significant landscape, with strong character, geographically constrained for traffic flow, sensitive to ground water problems and was only included in the original plans by manipulating surveys and bowing to considerable developer lobbying. It is not included in any of the WAPC Activity Centre Maps 	<p>of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>It is recommended to review building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>Element 3: Podium Setbacks, Height and Site Cove</p> <ul style="list-style-type: none"> Even the plan itself agrees that podiums are poor built form outcomes designed to provide a cheap means of car parking. Slimmer taller buildings can be accepted if they do not sit on a 3 storey base which negates any benefit from a slimmer building. At ground level, the close up level podiums appear as sheer blank barriers. No podiums in residential areas 	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				<p>Element 4: Tower Setbacks and Separation</p> <ul style="list-style-type: none"> Obviously the tower setback on Mill Pont Road north should be the same of further back than the street setback – which we recommend should be increased to 8-12 to blend with existing contemporary buildings. 	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Minimum tower setbacks and tower floorplate area requirements will combine to determine tower location. Minimum setback requirements are important to ensure sufficient separation between towers.</p>	

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				<ul style="list-style-type: none"> Tower side and rear setbacks should be a minimum of 5 metres in Mill Point and Hillside areas. The requirements for overshadowing are totally inadequate and the SSPAG support the submission 60 on this issue 	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	
				<p>Element 7: Design Quality</p> <ul style="list-style-type: none"> Quality over Quantity is exactly what the community wants, but what this plan provides for is a very convoluted set of controls to enable excessive height and quantity, what it lacks are the requirements to ensure these new developments are built to ensure the health and safety of new owners and the neighbouring residents The controls are clearly not in accordance with the Character Statements of a 'similar scale' by allowing very tall buildings (13 to 33 storeys) anywhere along Mill Point Road North While Design WA establishes baseline requirements in terms of the design of a building, it can still produce an awful looking building. Where the requirements for Sustainable Buildings as are promised? A 4star rating is inadequate. Where is the Groundwater Study that could have led to requirements that would prevent the disaster of Aurelia from ever happening? 	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which represents Australian best practice. Buildings seeking additional height are likely to consider higher ratings to meet other design outcomes and demonstrate design excellence.</p> <p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				<p>Element 8: Approval for Additional Development Potential (Height and Plot Ratio)</p> <p>This entire element would not be required if sensible and appropriate medium developments were directed to specific areas where the needs are greatest.</p>	Comment noted	
				<p>TRAFFIC</p> <p>How will our roads handle this density?</p>	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	

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				<p>PARKING</p> <p>Parking measures that will likely result in future on-street parking problems must be avoided.</p> <p>Whose responsibility would it be to maintain any vehicle sharing arrangement?</p> <p>The concept of unbundling parking spaces from apartments is short sighted.</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
39	22 July 2019	Email	Not Support	<p>Flawed Document because it is based on a population estimate that is neither justified nor necessary.</p> <p>The South Perth ACP area will have a larger population than a Strategic Metropolitan Centre. Is this justifiable?</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	ACP – 2, 4, 5, 7, 26, 27, 28 A61 – 1-5, 7, 8, 10-17, 20-28
				<p>We still have requirements for a significant amount of car parking in apartment design. Not only should this not be necessary in South Perth, it means that the proliferation of podium car parks will continue, giving rise to a very poor urban design outcome.</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>Character areas</p> <p>The four character areas are self-selecting by and large. However, Mill Point stands out because it is shown as a single character area but the controls that relate to it do not reflect the character as described and create more than one area.</p> <p>Therefore, keep Mill Point north of Judd as a quieter residential street and lower densities than those possible under the ACP. There</p>	Comments noted	

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				<p>will be more comment on this when looking at the detail of Amendment 61.</p> <p>If you insist on some sort of enclosure around the intersection, then have just the north side of Judd available for more intensive development.</p> <p>The description of the Richardson character area seems to be dependent on the train station happening:</p> <p>Given this is the desired future character for the area why is there wall to wall opportunities for towers? Without a train station where is the justification for all the proposed development?</p>		
				<p>Housing Diversity</p> <p>Has any thought been given to requiring a proportion of affordable/social housing in developments that seek the exercise of discretion to gain extra height/other bonuses? This would seem to be a more direct public benefit than the very non-site-specific public benefit contributions being proposed.</p>	Affordable Housing could be considered under the draft ACP as a public benefit, which could be assessed when seeking Tier 2 building height.	
				<p>Building Height.</p> <p>Objective i: How is this going to work during the lengthy transition from the current situation to the desired future? How is this going to work when tall buildings are allowed throughout the area with no ability to predict where such developments may occur?</p> <p>Objective ii, Objective iii: The ACP is an inner-city activity centre designated as a District Centre, no more. The physical proximity of South Perth to the CBD does not translate into it being a second CBD, because it has physical separation from the CBD by Perth Water, unlike (say) West Perth or North Perth that do not have any physical separation. The comparison made with Southbank or South Brisbane is inappropriate.</p> <p>Objective iv: It needs to be stated that the ‘appropriate locations’ are within the ACP area. But the development itself should provide public benefits in return for the exercise of discretion, rather than contributing to a ‘pool’.</p> <p>Objective v: The Mends Street ferry provides transport to one destination only so has limited utility as part of the transport offering for South Perth. It is not a justification for massive high-rise developments. If larger scale developments should be located within walking distance of the proposed train station why is three-quarters of its catchment excluded?</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area,</p>	

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					<p>and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p> <p>Objective v comment noted.</p>	
				<p>Podium Setbacks:</p> <p>Objective i: Is it going to encourage pedestrian movement if podiums are right up to the street?</p> <p>Objective ii: The proposed heights are in the main not of a human scale. Mid-rise of say 8 – 12 storeys is far better. High population densities can be achieved with these building heights.</p> <p>Objective iii: Who or what determines viability?</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Comments Noted.</p>	
				<p>Tower setbacks</p> <p>Objective i: This is supported</p> <p>Objective ii: supported</p> <p>Objective iii: supported.</p> <p>Objective iv: Supported but depends on size of tower.</p>	Comment Noted	
				<p>Tower maximum Gross Floorplate area</p> <p>Objective i: This is fine in principle but has not been demonstrated in practice with either The Pinnacles or Aurelia. Both tower elements have a larger footprint than the eight storey buildings along Mill Point Road that have been criticised for being low and bulky. Therefore, what faith can the community have that taller equals more slender buildings? A larger site achieved through land</p> <p>There is a disparaging reference in Part 2 of the ACP to the area north of Judd Street being characterised by bulky mid-rise development of around 8 – 10 storeys. The older towers in Hillside are far bulkier. The ACP will further encourage bulkier buildings as things stand. assembly will allow a tower with a large footprint. Should you have a maximum tower footprint regardless of site area?</p> <p>Objective ii: supported</p> <p>Objective iii: Not sure how this is going to work. Surely design excellence is a given anyway and innovation and sustainability should also be givens.</p> <p>Objective iv: Are there not wind impacts that are exacerbated by taller buildings?</p>	Comments noted	

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				<p>Plot Ratio</p> <p>Objective i: Good in principle but what happens if large sites are assembled?</p> <p>Objective ii: supported</p> <p>Objective iii: supported.</p> <p>Objective iv: Don't know how this would work. Is the intention to get designers to use less than the maximum PR permitted? Or is it to try and get them to design buildings that are 'excellent' because of PR restrictions?</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height and plot ratio limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p>	
				<p>Street Interface</p> <p>Objective i: Wouldn't pedestrian amenity be improved by not having the ability to approve such tall buildings? Is the street interface design trying to be too prescriptive?</p> <p>Objective ii: So why allow tall towers on Mill Point Road North? They are the complete opposite of being complementary to the existing development.</p> <p>Objective iii: OK by and large but surely the commercial uses, especially retail, should be closer to Mends Street and not scattered throughout the ACP area?</p> <p>Objective iv: OK – but is it feasible to have surveillance of the public domain from the 40th floor?</p>	<p>The proposed street setbacks provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting and street furniture integration.</p> <p>Retail and commercial units are to be articulated with a width of between 6 and 9 metres in active streets to ensure variety and a human scale are maintained in the street interface. This contributes to creating an active pedestrian-friendly environment.</p> <p>This requirement is included in the draft ACP and so can be varied if there is sufficient justification that the objectives and desired outcome will be achieved in an alternative way.</p>	
				<p>Heritage</p> <p>Objective i, Objective ii: All good except the track record with tower proposals adjacent to heritage buildings do not seem to represent sensitive responses and certainly does adversely affect the character of the place.</p>	<p>Comment noted</p>	
				<p>Amenity and Design Quality</p> <p>Objective i: And what about the amenity for non-occupants?</p> <p>Objective ii: OK – and are you convinced that tall buildings will achieve this?</p> <p>Objective ii: Yes, but determining 'exemplary' design remains subjective, whatever you may think of Design WA. Given that one of the qualities is that a design should be visually striking, that COULD be achieved through being taller than anything else. The Montparnasse Tower is visually striking but will never be repeated. How do you guard against that sort of development? And as for being memorable - could be memorable for all the wrong reasons!</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p>	

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				<p>Objective iv: OK, as it should be. But the amount of noise coming from the Freeway is such that as a minimum you will need to provide double-glazing to all windows facing west. It means that you will not be able to use external balconies. And yet the ACP allows more and denser development adjacent to the Freeway. Is this good planning?</p> <p>Objective v: Good to see the overshadowing applies over a number of hours on 21 June, not just at midday. The overshadowing appears to apply only to lots adjoining the proposed development. A tall building will cast its shadow beyond adjoining buildings so why not require the overshadowing criterion to apply to a wider area (e.g. for a distance three times the height of the proposed building? So, a 100 metre tall building would require the overshadowing calculation to be done on properties within 300 metres of the tower).</p>	<p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is recommended to modify the overshadowing requirement in the ACP to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties.</p>	
				<p>Bicycle Parking and Access</p> <p>The AC is supposed to be able to access high-frequency public transport (even without a train station – which it doesn't), is described by some as a TOD (although I notice that's one of the public transport objectives, so clearly is not a TOD) and is described by Council as an inner-city area. So why require the amount of parking? Surely now is the time to start really squeezing the number of car bays – unless of course you really don't believe the area is well-served by public transport and is not a TOD and apartments will be unsaleable without the current provision of car bays. I suspect that is the reality – you are being pressured by developers to maintain generous parking standards.</p> <p>Another public transport objective is to reduce car dependence, but your car parking standards are just like giving the junkie another fix.</p> <p>Even Part 2 suggests the transport revolution that is only just beginning will radically reduce the need for public and private parking infrastructure.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
				<p>The Guidance Statement for the station (5.2.3) talks about 'development opportunities within adjoining public land should be investigated'. Is this a reference to Richardson Park? If so, I agree although I know those organisations that use Richardson Park may not be happy. But to maximise the catchment of the proposed station, development opportunities on Richardson Park must be on the agenda.</p>	<p>The draft ACP and proposed Amendment 61 do not provide zoning for activity on Richardson Park.</p>	
				<p>These objectives are not going to be achieved with the provisions proposed by the ACP and Amendment 61, especially Objective ii. And what encouragement does the ACP give to achieve Objective iii? There are fewer requirements for non-residential uses than was the</p>	<p>Comments noted</p> <p>Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre.</p>	

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				case with the 2011 Station Precinct Plan. It is non-residential employment uses that will make South Perth a destination station, not more and more apartments.	<p>Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. The development requirements only apply in the Mends and Richardson Character areas and combine with preferred uses at ground level to support the development of these areas with a mix of land uses.</p> <p>Notwithstanding, there may be practical reasons why development could be constrained by these requirements, based on demand for commercial floor space. This may either prevent development or result in vacant ground floor frontages.</p> <p>It is recommended to modify development requirement 3.1.4 of the ACP to allow for development to provide commercial grade minimum floor to ceiling heights for the percentage of the development that would otherwise be required to be commercial, so that this area can be converted to commercial at a later date.</p> <p>Development requirement 3.1.4 does not prevent development of sites with 100 percent non-residential floor space.</p>	
				<p>Public Streets</p> <p>The whole of the Mill Point character area consists of Garden Streets with the exception of a short stretch of The Esplanade. Therefore, how can you justify the amount of development potential that is available under the provisions of the ACP? This runs completely counter to the character of garden streets</p> <p>How are you going to enhance landscape quality and character with the density of development allowed along Mill Point Road north?</p> <p>It is a similar story with the Richardson character area except for Lyall and Richardson Streets, and Labouchere Road.</p> <p>Similarly Mill Point consists of passive streets apart from street corners, where the interface is predominantly residential not four storey car parks masquerading as podiums.</p> <p>Yet again, with this whole section, the objectives will not be achieved through the provisions contained in Amendment 61. You are guaranteeing failure.</p>	<p>Comments noted</p> <p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>Public Benefits Framework</p> <p>Proportional to the size of the development means what?</p> <p>Contributions to be pooled but shouldn't the money be spent ameliorating the impacts where the development happens? Will a separate fund be established by the City to secure these contributions?</p> <p>While commendable, the public benefit contribution is hard to define and appears to allow a contribution to be delivered at some distance from the proposal that gave rise to the requirement for a</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded</p>	

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				<p>contribution in the first place. Indeed, is there a guarantee the contribution will be spent within the ACP area?</p> <p>7.4 states that the local government shall establish a clear framework for the management and expenditure of funds. This is like the need for an expenditure plan in a more traditional developer contributions scheme. The problem is the required clear framework should form part of the ACP, and it doesn't. Just like Amendment 25 to TPS 6 required the preparation of a DCP which has never been done, what is there to guarantee a 'clear framework' will be provided within which contributions to the public benefits fund can be made? It is only when this framework has been prepared that the area within which contributions are to be made will become clear, the items to be included will be identified, and a capital expenditure plan provided. Before that is in place, applicants will refuse to pay the contribution because they do not know what the contribution is for, and Council cannot provide them with an answer.</p>	<p>by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>10 year review and renewal of ACP</p> <p>Why has the ACP been designed to accommodate change to 2041? The LSP only has a 10-year timeframe and that is the overriding strategic document for South Perth. The ACP should run for no more than 10 years with a review (or reviews) conducted prior to its end date.</p>	<p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p>	
				<p>KPI's</p> <p>It is all well and good to have KPIs but they need to be within the control of Council in order to be able to measure performance, and they must have benchmarks.</p>	<p>Comment noted</p>	
				<p>The ACP has been prepared on the basis of flawed projections for both population growth and dwelling need.</p> <p>The ACP promotes far more tower development than is needed. This will destroy the character of this part of South Perth. In particular, the amount of tower development contemplated in the Mill Point area runs completely counter to the objectives for that character area, not to mention its existing characteristics.</p> <p>It is both disappointing and, frankly, a shame that through the ACP Council appears to be hell-bent on transforming the ACP area from what is already a relatively high-density area with a largely mid-rise built form into the worst excesses of a concrete jungle. Any vestige of a village feel, that has been the hallmark of South Perth to date, will be lost.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p>	

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				<p>The ACP area is not and should not be considered to be an inner-city suburb in the sense that it needs to be a highly urbanised, densely developed area. It has completely different characteristics and need not change to the extent proposed, even to accommodate the dwelling targets as set by the WAPC. Surely having South Perth displaying a point of difference to other areas that are close to the CBD should be celebrated.</p> <p>Do you really want increased traffic congestion combined with severely downgraded air quality as a result? Be careful what you wish for.</p> <p>The overall objective for the ACP area is misguided. It is a geographically constrained area that cannot accommodate the massive amounts of development allowable under the ACP. The result will be a disaster that is entirely foreseeable.</p>	<p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>Amendment 61 - Character Areas</p> <p>Mends</p> <p>There is no justification for the massing that is proposed around the Ferry terminal. The description suggests a major transit node when the ferry service, while useful enough, is not of a scale that suggests development around it should be like a significant transport hub. It does not form the heart of a network of public transport; there is one destination available to patrons; it is a low-key transport facility.</p> <p>What do you mean by ‘negative amenity impacts’ on Windsor Park and the Zoo? Is it overlooking? Why have ‘buildings SHOULD be designed’? Why not MUST?</p> <p>What do you mean by ‘human-scale’?</p> <p>Why reference Elizabeth Quay? This is a completely separate location and serves a completely different function to the South Perth Foreshore. The only connection is the ferry.</p> <p>You would hope the development on the Landmark site should provide a central civic space of the ACP.</p> <p>And allowing increased levels of development along The Esplanade is going to achieve this?</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>Richardson</p> <p>And what happens if the train station doesn’t eventuate?</p> <p>This objective is stating this obvious at one level but raises concerns at another. You have consistently argued that lot amalgamations will be difficult and consequently development at the maximum height possible would be unlikely. Yet this objective positively encourages</p>	<p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	

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				<p>lot amalgamation. Are you actively encouraging maximum height development?</p> <p>And how will you achieve the ‘dispersal’? What happens if adjoining landowners want to develop to the maximum height their land allows? You won’t be able to prevent that based on this objective. This objective will also fail if current applications for development along Melville Parade are successful.</p> <p>What do you mean by ‘relief at the human scale’?</p> <p>What is an appealing connection? How will you achieve this – by acquisition? Could this be a public benefit contribution?</p> <p>If there are areas of Richardson Park not used as sports grounds why not use them for additional development given that this area is the closest to the proposed train station. It would be the obvious place for higher density development to capitalise on that piece of infrastructure, but you seem to be reluctant to do anything of the sort, preferring to cram higher densities into established areas.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. There is no requirement for any property to provide a mid-block link or pocket park. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p> <p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>The draft ACP and proposed Amendment 61 do not provide zoning for activity on Richardson Park.</p>	
				<p>Mill Point</p> <p>Can you seriously claim that this objective is met with the provisions in A61?</p> <p>Surely any small-scale shops should be concentrated in the Mends area rather than dispersed in a ‘predominantly’ residential area in order to maintain viability. Scattered retail surely will not be viable?</p> <p>Does this form part of the ‘achieving exemplary design’ if discretion is sought?</p> <p>Surely the whole thrust of your taller buildings approach is to have slimmer towers so this objective should read ‘will’ or ‘must’, not ‘should’.</p> <p>As with objective xii in Mends.</p> <p>How is this going to work? How will you get the private open spaces to be accessible? Who maintains them?</p> <p>As with objective ix in Richardson.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. The indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p> <p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>Shop and Small Bar uses are proposed as an ‘X’ use in the Hillside and Mill Point character areas and ‘P’ and ‘D’ respectively in Mends and Richardson. It is not recommended to change the permissibility of these uses.</p>	

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				<p>Hillside</p> <p>This is not an objective it is a statement.</p> <p>As with v in Mill Point.</p> <p>Not sure how this (and objectives I and ix) is going to work when Hillside doesn't include The Esplanade.</p> <p>As per viii in Richardson.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p> <p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>It is recommended to amend the boundary between the Mends and Hillside character areas to include properties on South Perth Esplanade east of Mends Street in the Hillside character area.</p>	
				<p>Provision 5</p> <p>1.5 – suggest removing local shop from Mill Point and Hillside. Retail uses in Richardson presumably just on the 'active streets'?</p> <p>Table 1</p> <p>Why have you included Student Housing? Is there any demand for it in the ACP area? Is it forecast? Is it viable?</p> <p>Don't have convenience store in Mill Point or Hillside.</p> <p>What sort of Educational Establishment do you see in Mill Point and Hillside?</p> <p>Have you included High Level Residential Aged Care Facility in Mill Point because one of the applications suggested that as a possible use – which was roundly condemned at the time because of its unsuitable location?</p> <p>Indoor sporting activity in Hillside – do you have something in mind?</p> <p>Local shop should be X in Mill Point and Hillside.</p> <p>What sort of office use do you expect to see in Mill Point and Hillside other than to act as a sleeve in a podium to hide car parking? Is that where you want to encourage office use? Surely this should be concentrated in Mends and Richardson if you want to promote South Perth as a destination to justify improved public transport services?</p>	<p>Comments noted</p>	

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				<p>It is interesting that ‘Serviced Apartment’ is X in Mill Point and Hillside, given your unequivocal support for such uses in Mill Point in the past. I agree with your current approach.</p> <p>Shop should be X in Hillside.</p> <p>Small bar should be X in Mill Point and Hillside. That sort of use should be directed towards Mends – maybe DC in Richardson.</p> <p>You have Tourist Accommodation and Tourist Development as DC in Mill Point and Hillside but not serviced apartments. Serviced apartments would fall under the definition of tourist development</p>	<p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p> <p>Shop and Small Bar uses are proposed as an ‘X’ use in the Hillside and Mill Point character areas and ‘P’ and ‘D’ respectively in Mends and Richardson. It is not recommended to change the permissibility of these uses.</p>	
				<p>Element 2 and Map 2</p> <p>As indicated at the beginning of this submission, the building heights suggested in Element 2 provide for an excessive amount of development which is not justified by existing or projected demand.</p> <p>Compared with the current controls in LPS 6, there has been no adequate explanation or justification for the base height to rise to 50.7 metres in the ‘High’ areas. This compares with a maximum of 25 or 41 metres at present, so you can now have an approximately 16 storey building that requires no architectural excellence to be displayed. This is twice the height (or more) of many of the existing buildings that would be adjacent.</p> <p>The same degree of height increase at Tier 1 and Tier 2 also cannot be justified. This applies particularly in the Mill Point character area. The Tier 2 area has been shown going north along Mill Point Road to Scott Street and Frasers Lane. This is only because of the applications that have been made to develop towers at 74 and 76 Mill Point Road – there is no other possible justification. The Tier 2 area should not extend beyond the intersection of Mill Point/Labouchere Roads and Judd Street. This would enable taller buildings to be developed there and would provide an urban enclosure to that intersection, which appears to be what Council wants to achieve. It would stop the spread of towers north up Mill Point Road, thereby preserving the character that is inherent in the ‘Character Area’ description.</p> <p>It would concentrate the density closer to the facilities of Mends Street and would be closer to any future train station (though not within walking distance on the north side of the intersection, in my opinion).</p> <p>If the argument is that the existing Special Design Area extends as far north on Mill Point Road as is now proposed in Tier 2, that may be true but in the original Station Precinct Plan it was never the intention to have buildings up to 90 or 123 metres tall on that part of</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p> <p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p>	

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				<p>Mill Point Road. Also, the current plan has significantly extended the area capable of accommodating tall buildings compared with the area covered by the current Special Design Area. Therefore, in terms of development capacity even removing Tier 2 from Mill Point Road north would still allow for far more development than under the current scheme provisions.</p> <p>The extension of Tier 2 down the east side of Mends Street to the Esplanade is also questioned. This allows 60-metre-tall buildings – roughly 19 or 20 storeys. Why only on the east side? If you want to encourage taller buildings and an activation of the ferry terminal and an activation of Mends Street, why not Tier 2 on the west side as well? Why not all the way along the Esplanade in the ‘Medium’ height areas? What is the agenda preventing such a proposal?</p> <p>You have Tier 2 along the west side of Labouchere Road as far south as Hardy Street. That allows buildings up to 123 metres to be built because it is within the ‘High’ area. South of Hardy Street, the Labouchere Road frontage allows up to 90 metres or close to 30 storeys – 10 more than The Pinnacles. All this can happen with only a 2-metre setback. And yet in the ACP Part 2 it says explicitly there will be controls to make sure the sort of overlooking of the Zoo that The Pinnacles provides will not be able to happen. Clearly this is untrue. Why do you insist on having the ability to have such tall buildings overlooking the main attractor to South Perth and one of the main attractors of intra and inter-State visitors? You must rectify the provisions and height controls to prevent any more overlooking of the Zoo.</p> <p>How do you intend to handle the transition between the current type of development and the future vision? This applies to Richardson particularly where there is the greatest amount of potential for additional development and where it should be encouraged if you want to stand any chance of getting a train station. It is also the area where there is the greatest number of older properties that may be suitable for redevelopment. There needs to be more guidance provided, especially when discretion is being sought, particularly in terms of Clause 67 of the Deemed Provisions with respect to amenity.</p>	<p>Some minor changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p> <p>Comments noted.</p>	
				<p>Element 3 and Map 3</p> <p>Podiums as they are being used in South Perth are an abomination. They are an awful device used to provide (and hide) car parking. You need to think more deeply about car parking provisions to see if you can get rid of podiums – treat the disease not the symptom.</p> <p>This is another reason for removing the ability to have taller buildings along Mill Point Road north. The ground conditions are</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of</p>	

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				<p>such that as a maximum you might get one basement level of parking, all the rest will have to be above ground.</p> <p>It is completely unfair and unacceptable for residents adjoining a development with a podium to have to put up with an 11-metre blank wall that could be right on the boundary. This is the equivalent of almost four storeys. How can this in any way assist with passive solar design and other measures aiming at sustainability? How can you describe this as providing any amenity for existing or future residents?</p> <p>And why does the podium site cover increase in the Tier 2 areas within Mill Point? Surely if there is the ability to go higher with the tower a trade-off should be a smaller (or certainly no larger) podium than would be allowed for a shorter building? Is this simply to cater for development applications that are already in the system?</p> <p>The street setbacks are an improvement in some areas. I am not quite sure why several streets in Richardson have 6 metre setbacks and yet Mill Point Road north only has 5 metres – given that street’s special characteristics. It should also have a 6-metre setback to make sure the mature trees can be maintained and to correspond with most existing setbacks.</p>	<p>existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				<p>Element 4</p> <p>The tower setback on Mill Pont Road north should be further back than the street setback, unless the latter is increased.</p> <p>Tower side and rear setbacks should be a minimum of 5 metres in Mill Point and Hillside.</p>	Comment noted	
				<p>Element 6</p> <p>The use of plot ratio to control height is supported, but the plot ratios suggested are too high. Site amalgamation will be used to maximise development potential.</p> <p>The comments about base heights apply to base plot ratio as well. Why do you have a plot ratio of 7.2 in the ‘High’ areas as of right? This is excessive and unnecessary, as is the 9.8 ratio in the ‘High’ Tier 2 areas.</p>	Comment noted	
				<p>Element 7</p> <p>It also gives the Design Review Panel almost an undue influence over a planning decision. How many times has Council gone against the advice of its DRP? Will it ever go against its advice, notwithstanding the words in Clause 7.4 that the advice of the DRP will be given ‘due regard’ only? Why is the Office of the Government Architect not</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p>	

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				<p>involved particularly with applications that seek discretion to provide for additional height?</p> <p>According to Clause 7.3 (b) the ONLY measure of exemplary design quality is whether it is defined as such by a policy or guideline of the WAPC – no discretion!</p>	<p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				<p>Element 8</p> <p>This will no doubt give rise to controversial decisions, especially as has been pointed out the objectives of the character areas is not matched by the controls in A61.</p> <p>The whole idea of a public benefit contribution is strange in that a development that warrants such a contribution should be making it where the development takes place. How is the contribution to be quarantined from general Council expenditure?</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
40	19 July 2019	Email	Support	<p>Request that the Royal Perth Golf Club site also be included within the activity centre boundary in the draft ACP and also identified in Amendment 61 with appropriate built form controls.</p> <ul style="list-style-type: none"> Lot 1 Labouchere Road is situated at a gateway into the Activity Centre; The golf club and facilities are a key visitor attraction in South Perth; The site has an intrinsic relationship with the South Perth community and the Activity Centre; 	<p>Royal Perth Golf Club is subject to a MRS reservation for 'Parks and Recreation. The South Perth Activity Centre Plan cannot modify this reservation and this responsibility rests with the State Government.</p> <p>The South Perth Activity Centre Plan has been prepared on the basis that forecast growth can be accommodated within the area of the draft plan.</p> <p>Without any indication from the State Government that it intends to modify the Parks and Recreation reserve, it is considered unsuitable for the draft ACP to consider development on the reserve.</p> <p>The club may consider approaching the State government directly for amendments to the MRS.</p>	

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				<ul style="list-style-type: none"> The site is in a walkable distance to the proposed location of the future South Perth railway station; The site is unique, being freehold land, affording the Club opportunities to investigate ways to diversify their club operations and remain sustainable commensurate with their lease arrangements to run the adjacent golf course. The activity centre plan would provide potential for intensification of land use and additional activity consistent with its primary relationship with the golf course; and It forms a logical extension to the Richardson Character Area. 		
41	22 July 2019	Feedback Form		As with previous surveys and feedback, I anticipate alternative meanings will be attributed to these "warm and fuzzy" questions to those which the community understood at the time. If this happens the integrity and credibility of Council and its officers participating in community consultation will be further tarnished.	Comment noted	A61 – 12-15 A61 – 27, 28
				<p>There is no attempt to progressively move towards a 2030 or 2040 target, its disruptive implications apply from the date of gazettal, hence no retention of character!</p> <p>The Planning strategies and objectives need to clarify the way in which these Schedules are to be interpreted - will the impact of the development be consistent with the objectives? If not, does not comply, irrespective of the Planning words!</p>	Comment noted	
				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	<p>The larger regional spaces including Perth Zoo, Richardson Reserve, Windsor Park and the foreshores are existing.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
				<p>The trees lining the streets are at risk with podiums and development to the street boundaries.</p> <p>Inadequate requirements to provide public open space as part of any "tall" building and podium development.</p> <p>Failure to address "avenue" aspects of existing major roads by keeping developments further from street boundaries.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	

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				<p>The whole process appears to be without information from Main Roads about their plans to develop the roadways.</p> <p>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 site access/egress must be part of any new development</p> <p>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).</p> <p>No development needs to exceed 12 storeys to achieve densities by 2030</p> <p>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.</p> <p>Averaging setback on street frontages shall not allow less than the minimum setback.</p> <p>Active street frontage of commercial property shall be set back from the street boundary and NOT infringe on the footpath at all.</p> <p>History has shown the numbers can be manipulated to suit developers.</p>	<p>Main Roads WA has provided comment and are continuing discussions with the City.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p> <p>Parking is managed in line with the City's Parking Management Plans.</p> <p>Comment noted</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Streets setbacks may be averaged in response to site and context conditions where it can be demonstrated that the variation does not have a detrimental impact on the streetscape character and local amenity.</p> <p>Comment noted</p>	
42	18 July 2019	Email		<p>Comments about the Activity Centre map, appendix 9.B Map 2, which covers height and plot ratios.</p> <p>I endorse your plan of increased heights and the tiering of building heights increasing from the outside inwards.</p> <p>I have strong reservations regarding plot ratios as I understand that above ground parking is included and wholly below ground parking is excluded. This creates an issue for my work property in Hardy Street as the water level is approximately 1 metre below the surface. With global warming and the rise in sea levels this will be an increasing problem in the future.</p> <p>On the map there are mid-block links. There has been no negotiation or discussion about these links with land holders and they are completely impractical for implementation. I would request you exclude these links from the plans.</p>	<p>Comment Noted</p> <p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking, and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning</p>	ACP – 27, 28

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					<p>to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
				All building height measurements should be the same throughout the Activity Centre based on the natural ground level.	Amendment No. 61 measures building height from natural ground level.	
				Pocket parks have onerous conditions placed on the costs of creation and maintenance, which I object to.	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
				Overall, I congratulate the council on its prolonged efforts to reach consensus and good planning for the future of South Perth.	Comment noted	
43	22 July 2019	Feedback Form		<p><i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>Above ground parking should not be defined as plot ratio anywhere in the precinct.</p>	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking, and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.	ACP – 5, 6, 7, 9, 11, 12, 19, 22, 23, 27, 27, 28 A61 – 2, 3, 7, 8, 12-28
				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.	Comment Noted	
				Serviced Apartments should be permitted for Hillside and Mill Point area. If tourist accommodation is DC for the character area, it doesn't make sense to exclude Serviced Apartments.	<p>The current use 'serviced apartment' is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	
				<p>Building height caps should not be enforced. There are onerous setback and plot ratio requirements coupled with natural site constraints that will dictate building heights.</p> <p>It is unreasonable for any site currently within the Amendment 46 Special Design Area not to be included within the highest building height limit with Tier 2 potential.</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas, with areas of higher typologies generally</p>	

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				<p>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 development applications, it is not reasonable to restrict these developments to 90.3m.</p>	<p>located closer to the centre of the ACP area, and ensure appropriate interface between areas of different height types. It is not recommended to increase the building height limit for medium-high sections of the Mill Point and Richardson character areas.</p>	
				<p>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, don't believe this is significant enough to respect the existing situation.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The existing Town Planning Scheme No. 6 has a building height limit of 25 metres for properties fronting South Perth Esplanade between Mends Street and Frasers Lane, which is measured to the finished floor level of the upper-most storey. This allows for a building of up to approximately 30 metres height in total. Tower setbacks are required to be 4 metres or less and there are no tower floorplate area limits.</p> <p>In areas designated Medium typology the base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	
				<p>There are inconsistencies with the mapping of building height and plot ratio limits across the precinct. Notably sites on South Perth Esplanade are mapped with different height limits across single sites.</p> <p>The yellow tier 2 line should stop behind Windsor Hotel excluding 83-85 South Perth Esplanade from the Tier 2 zone.</p>	<p>Comment noted. Some minor changes are recommended to clarify building height limits on sites where more than one typology applies.</p>	
				<p>Amendment 61 provisions allow for less flexibility in the design of podiums than the current framework permits. In most precinct' podiums are required to have significant street setbacks, far greater than the existing framework allows; this will severely impact the development potential of sites.</p> <p>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.</p>	<p>Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term 'podium' be replaced with the term 'base' in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are</p>	

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					<p>recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p> <p>Some minor changes are recommended to street setback requirements to address concerns raised in submissions relating to specific locations.</p>	
				<p>Amendment 61 suggests some small scale commercial for Mill Point and Hillside where ‘appropriate’ however such onerous street setbacks make commercial tenancies mostly unviable.</p> <p>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.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p> <p>Street setbacks may be averaged in response to site and context conditions where it can be demonstrated that the variation does not have a detrimental impact on the streetscape character and local amenity.</p>	
				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.	Comment noted	
				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 Amendment 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).	Comment noted	
				<p>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 (2,000sqm) is around 60% after all podium setbacks are accounted for.</p> <p>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.</p>	<p>The site coverage and podium setbacks combined with other design guidelines to ensure there is some consideration in the bulk and impact of a building. The guidelines describe a maximum coverage for podiums and tower floorplates. However in some cases the setback requirements restrict podium floorplate to less than the site cover limit.</p>	

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				<p>Side setbacks in Amendment 61 are problematic for smaller sites.</p> <p>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.</p> <p>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.</p> <p>The principal for taller and slender towers is supported and has been an ongoing concept central to our recent Development Applications within the precinct.</p> <p>On review, it is apparent that tower footprints become very inefficient on sites smaller than 1,800sqm when additional building heights are sought.</p> <p>Development Applications seeking additional height on sites smaller than 1,200sqm 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.</p> <p>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.</p>	<p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>Minimum tower setbacks and tower floorplate area requirements will combine to determine tower location. Minimum setback requirements are important to ensure sufficient separation between towers.</p> <p>The comment regarding tower footprints on smaller sites is noted. Additional building height will not be practical on all sites and this will help to encourage a variety of building heights across the ACP area.</p> <p>The suggestion to introduce a system where tower floor plate limits reduce incrementally as building height increases may have merit. However, there is no evidence that the tiered system proposed in the ACP and Amendment No. 61 will create a lack of diversity of building heights. It is expected that building height on each site will be determined by the interaction of the different development requirements and that the optimal outcome will vary from site to site.</p> <p>Ongoing monitoring of the documents will be undertaken to assess if this concern is realised. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p>	
				<p>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. Believe inset balconies are ideally suited to tower developments because they offer improved wind protection.</p>	<p>Comment noted. Tower floorplate area requirements must balance the objective to encourage slimmer towers with the objective to provide attractive and generous balconies.</p>	
				<p>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.</p> <p>The design Review Panel should be the sole arbiter to determine design quality.</p> <p>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</p>	<p>Developments that exceed the Tier 1 height/plot ratio limit must be of exemplary design quality, which is defined in the draft ACP as “being of a standard that provides a high benchmark for design, innovation, and sustainability and is visually striking and memorable in the context of the locality”. In order to achieve this standard the applicant must undertake a competitive design process between a minimum of three suitably qualified architects that is independently assessed in accordance with the City’s South Perth Activity Centre Competitive Design Policy (P321). These requirements reflect the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be</p>	

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				<p>designs. It will likely cause controversy and tension in the local design profession.</p> <p>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.</p>	<p>reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				<p>The fund can be used to fund and construct the train station. The fund can also be used to upgrade stormwater infrastructure.</p> <p>This contribution scheme is generally supported however 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.</p> <p>We suggest that council conducts some financial modelling with applicants on several case studies to ensure the proposed scheme is commercially viable.</p> <p>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.</p> <p>Has an option been explored that changes the value of plot ratio based on the proposed tiering methodology?</p>	<p>Comments noted</p>	
				<p>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.</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p>	
				<p>The movement and access principles in the draft ACP is generally supported.</p>	<p>Comment noted</p>	
				<p>Landscape area alongside and rear setback can become wasted.</p> <p>The location of pocket park suggested in the draft ACP require reconsideration.</p> <p>The objectives of Part 1 are generally supported except ceiling height, podium and pocket park locations.</p>	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
				<p>The ceiling height in the ACP does not align with the maximum podium height in Amendment 61.</p>	<p>Podium height limits have been determined based on a 4.5m first storey and 3.3m for all subsequent storeys.</p>	

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				<p>The podium setback should allow more flexibility to address site context. Landscaping along side and rear setback can become wasted land.</p> <p>The objectives of Part 2 is generally supported.</p> <p>The details described in 7.3 Built form require further clarification.</p>	Comment noted	
				<p>Controlling development scale through both plot ratio, building setback, height and footprint is excess. There are discrepancy between the ACP and Amendment 61 and its causing confusion.</p> <p>Built form is being controlled by height, setbacks, podium and tower site coverage and plot ratio. Too many controls will hinder innovation and creativity.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p> <p>Ongoing monitoring of the documents will be undertaken. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p>	
				<p>The control does not factor in the capability of the City's infrastructure. For example, Amendment 61 encourages basement parking but the City's geotechnical condition and stormwater infrastructure cannot support basement construction in a cost effective manner.</p>	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				<p>There are a lot of discrepancy between the ACP and Amendment 61 causing confusion. The plot ratio set in Amendment 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.</p>	Comment noted	
				<p>The flipping of the height from the special control area to the centralized location is not supported.</p>	Comment noted	
				<p>Policy P321 is strongly not supported.</p>	Comment noted	
				<p>To mandate design competition for any Tier 2 proposals is likely to be onerous and costly for applicants. It is 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.</p> <p>It will likely cause controversy and tension in the local design profession.</p>	<p>Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area.</p> <p>Developments that exceed the Tier 1 height/plot ratio limit must be of exemplary design quality, which is defined in the draft ACP as “being of a standard that provides a high benchmark for design, innovation, and sustainability and is visually striking and memorable in the context of the locality”. In order to achieve this standard the applicant must undertake a competitive design process between a minimum of three suitably qualified architects that is independently assessed in accordance with the City’s South</p>	

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				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.	Perth Activity Centre Competitive Design Policy (P321). These requirements reflect the scale and significance of development above the Tier 1 limits. It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.	
44	22 July 2019	Letter	Not Support	<p><u>Inequity around New Height Limits</u></p> <p>It unreasonable in the extreme for any site currently with the Amendment 46 Special Design Area not to be included within the highest building height limit with Tier 2 potential. Land acquisitions were made, and significant land prices paid, under the clear understanding that height limits within this area were not limited. To now have these areas, and more specifically our stretch around our 74 Mill Point Road site substantially “pulled back”, is unfair.</p> <p>An additional and perhaps even greater inequity is in the giving of substantial additional height to a singular property that fronts the Esplanade (ie Part of The Peninsula site) and sits immediately adjacent to our site to the North. This highly unusual planning anomaly, given its multiple height levels across a singular title, severely prejudices our development value and potential, as it effectively blocks out the vast majority of our projects view corridors.</p>	<p>Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP.</p> <p>The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas, with areas of higher typologies generally located closer to the centre of the ACP area, and ensure appropriate interface between areas of different height types. It is not recommended to increase the building height limit for medium-high sections of the Mill Point and Richardson character areas.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	ACP – 7, 9, 11 A61 – 2, 3, 7, 8, 9, 12-17, 20-28
				<p><u>Height Controls more broadly</u></p> <p>We do not 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.</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p>	
				<p><u>Podium Setbacks and Height</u></p> <p>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.</p> <p>Amendment 61 suggests some <u>small scale commercial</u> for Mill Point and Hillside where ‘appropriate’ however such onerous street setbacks make commercial tenancies mostly unviable.</p> <p>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.</p>	<p>Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p>	

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				<p>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.</p> <p>Reducing podiums via restrictive site coverage and setback provisions will further drive parking below ground. South Perth is not conducive to deeper basements with a high water table and de-watering risks.</p>	<p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p> <p>Street setbacks may be averaged in response to site and context conditions were it can be demonstrated that the variation does not have a detrimental impact on the streetscape character and local amenity.</p>	
				<p><u>Car Parking</u></p> <p>Provision 3 of Amendment 61 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.</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p>	
				<p><u>Height</u></p> <p>It is acknowledged the improvements to base heights generally, which have brought them potentially into a more balanced position with the ultimate heights that may be obtained through design excellence and community benefits.</p> <p>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.</p> <p>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.</p>	<p>Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP.</p> <p>Whilst it is recognised that the existing development 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 (and noting that such a right is also subject to potentially unexpected impacts such as natural disaster response etc).</p> <p>Where no such restrictive covenant or other legally binding agreement exists, a buyer should assume that the planning frameworks may be subject to change and should be prepared for future planning review such as large-scale precinct planning. The detailed structure planning of the South Perth area has been foreshadowed for some time.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p> <p>Some minor changes are recommended to clarify building height limits on sites where more than one typology applies.</p>	
				<p><u>Plot ratio</u></p> <p>Built form is being controlled by height, setbacks, podium and tower site coverage and plot ratio. Too many controls will hinder innovation and creativity.</p> <p>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.</p>	<p>Comment noted</p> <p>Ongoing monitoring of the documents will be undertaken to assess if this concern is realised. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p>	
				<p><u>Site Coverage</u></p> <p>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</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p>	

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				<p>upon height zoning. Building heights will lack diversity if an incremental system is not implemented.</p> <p>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.</p> <p>Tower maximum floorplates not to exceed 40-50% at base building heights, and then reduced to 40-30% when Tier 1 and Tier 2 additional building heights are applied is excessive. We would request that these %'s increased by 10% each ie to 50%-40% when additional height considered.</p>	<p>The suggestion to introduce a system where tower floor plate limits reduce incrementally as building height increases may have merit. However, there is no evidence that the tiered system proposed in the ACP and Amendment No. 61 will create a lack of diversity of building heights. It is expected that building height on each site will be determined by the interaction of the different development requirements and that the optimal outcome will vary from site to site.</p> <p>Ongoing monitoring of the documents will be undertaken to assess if this concern is realised. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p> <p>Tower floorplate area requirements must balance the objective to encourage slimmer towers with the objective to provide attractive and generous balconies.</p> <p>Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.</p>	
				<p><u>Design excellence process</u></p> <p>To mandate design competition for proposals is likely to be unreasonably onerous and costly for applicants. It is considered unreasonable for a select Design Review Panel to dictate building designs throughout an entire precinct.</p> <p>It's only considered reasonable to conduct design competitions on large public sites. Imposing competitions to this extent for private enterprise 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.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				<p><u>Contribution Scheme</u></p> <p>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.</p>	Other comments noted	

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				We suggest that council conducts some financial modelling with applicants on several case studies to ensure the proposed scheme is commercially viable.		
45	24 July 2019	Letter	Not Support	<p><i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>The role of South Perth AC is overstated.</p>	<p>The South Perth activity centre is located at the geographic centre of metropolitan Perth, and its proximity to the Perth CBD means that it will play a pivotal role in the growth of the region.</p> <p>This area is attractive for housing, retail and office space, and is growing as an important destination for visitors and tourists. The South Perth activity centre is one of many inner-city locations experiencing growth, such as Perth CBD, Subiaco, East Perth and Burswood. Each location will grow at rates according to local circumstances but all locations are forecast to grow considerably.</p>	A61 - 11
				<p>The plan is based on unconstrained demand model and is exceedingly disproportionate to projected future development.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>The plan expands the plan area rather than constraining it to walkable catchment.</p>	<p>The South Perth Station Precinct Plan area was reviewed as part of the Place and Design project in 2017. Through this process it was recommended to focus on a wider area that that included in the South Perth Station Precinct because the areas surrounding the core Station Precinct area were considered to be closely connected and intrinsically linked. The expanded area is based on logical and natural boundaries and allows for community facilities, public realm, built form and character to be equitably considered and managed.</p>	
				<p>The peninsular is particularly adversely impacted by the plan. Remove it from the plan.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance</p>	

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					<p>of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				The proposed guidelines make the height bonuses worse.	<p>The building height limits help to establish the desired future scale of these areas and ensure appropriate interface between areas of different height types.</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP.</p>	
				Design competitions	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				The Tier 1 and Tier 2 height proposal is not supported.	Comment noted	

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46	21 July 2019	Email	Not support	Submission is as per the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
47	21 July 2019	Email		<p><u>Town Planning Scheme Amendment No.61</u></p> <p>I am an owner and resident on the Peninsula and very much personally impacted should the South Perth Activity Centre Plan and proposed City of South Perth Town Planning Scheme No. 6 - Amendment No. 61 be adopted. I am also very concerned for the adverse consequences for our community and place.</p> <p>My wife and I believe we are very representative of the type of people who have called South Perth home in the past, call it now and will call it in the future. I am also reasonably qualified to express an opinion on what good planning looks like. I am firmly of the view that the Plan and Amendment:</p> <ul style="list-style-type: none"> a) Do not conform to the State’s planning framework and objectives; b) Do not represent good planning outcomes; c) Are flawed and incomplete in content; and d) Disregard the interests of existing residences and ratepayers. <p>I do not accept, endorse or otherwise support whatsoever the adoption of Schedule 9B clauses 2.2, 2.3, 6.2, 6.3, 8.1, 8.2 and 8.3 and any related clauses, concerning additional building height and plot ratio discretions.</p> <p>I am particularly perturbed at the proposal to implement a Public Benefit Contribution system.</p> <p>It is formalised bribery. It incentivises Council to support larger developments. Benefits do not flow to neighbours of a development, nor to anyone who will reside in that development.</p> <p>The losers are those established neighbours to these developments.</p> <p>The reality is that such a scheme is designed to diminish the amenity and value of existing properties, enhance profit for short term developers and provide Council more discretionary funds.</p> <p>I am of the view that the Council is best served by:</p> <ul style="list-style-type: none"> a) Ensuring a Local Planning Strategy be completed and approved before any new Schemes are presented for approval or proceed to public comment; b) Rejecting the Draft South Perth Activity Centre Plan and Draft City of South Perth Town Planning Scheme No. 6 - Amendment No. 61. 	Comment noted	ACP – 11, 12, 17

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				<p>In the following I hope to convey some of the reason for my opinions.</p> <p><u>Population Growth and Dwelling Demand</u></p> <p>The entire Draft South Perth Activity Centre Plan and respectively the draft Amendment No. 61 have been prepared on the basis of forecasts of significant increases in population and dwelling demand.</p> <p>As a member of the Station Precinct Reference Group I have had an interesting journey of enquiry in this issue.</p> <p>First, I asked where the forecasts came from? The answer was the Bureau of Statistics. Then I asked whether these forecasts changed over time? The answer was yes, but only the latest Bureau forecasts had been used and trends from forecast to forecast were not considered. That is, the inconsistency between Bureau of Statistics forecasts over time were not considered. This includes the distortions caused by the most recent resources boom. Next, I asked for a copy of these calculations. The response was no.</p> <p>Other people were asking too, so the next response was that the State Government were imposing the targets but we couldn't obtain the State's requirements from the Council's Planners.</p> <p>More research and enquiry and a colleague found and shared evidence that growth figures had been provided by the State Government's WAPC but that they had relied on advice from the City of South Perth. That advice was for the whole of South Perth, not specific to the South Perth Activity Centre precincts.</p> <p>The forecasts originated from the South Perth Council's Planning Office and how they were determined is unknown. They then became mandated requirements.</p> <p>In all it has been a construct toward a predetermined outcome.</p> <p>The forecasts for population growth and dwelling demand that have been presented represent incrementally the largest increase per period in the history of South Perth and the whole of the growth is being imposed and confined to the Station precinct.</p> <p>Effectively the basis for planning is arbitrary and totally irrational.</p> <p>Ironically, when the figures are properly considered, the targets will be easily reached through the natural progress of infill across the whole of South Perth and within current planning schemes without any change to development density within the Station Precinct.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p><u>District Centre Residential Measures</u></p> <p>WAPC's Central Sub-Regional Planning Framework for the Perth and Peel Regions says that residential dwelling density targets per gross hectare are to be a minimum 20 and desirably 30 for district centres such as South Perth. The draft Plan also states this.</p>	<p>State Planning Policy 4.2 Activity Centre Plans for Perth and Peel classifies South Perth as a 'district centre', with a desirable population density of 30 dwellings per gross hectare. State Planning Policy 4.2 is intended to guide more detailed, localised investigations and the "desirable density" listed in the policy does not imply that greater density is undesirable or should not be approved.</p>	

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				<p>But, the draft Plan goes on to contradict this by forecasting a net residential density of 26.8 dwellings per hectare by 2031 and 41.5 dwellings per site hectare by 2041.</p> <p>So, the clear intention is to exceed the State’s recommendations, all the time saying the places are of a “residential character”. What is a “residential character” to our planners – lots of little boxes tightly packed without access to distant views or light?</p> <p>Earlier drafts of the South Perth Activity Centre Plan forecast a net residential density of 41.5 dwellings per hectare by 2031 and 67.0 dwellings per site hectare by 2041. There has been no discernible changes from the earlier daft Schemes so it is easy to doubt the figures presented.</p> <p>We are being presented with a planned/intended expectation of growth of 140% to 200% of the State’s own measures for desirability.</p> <p>Has our community considered this? Are we approving of this? Has it been explained?</p> <p>The answers are no.</p> <p>Should this type of issue be dealt with via a Planning Scheme Amendment? I think not.</p> <p>What does such a dramatic change do to the lifestyles or ratepaying residents and the infrastructure that will have to be funded and built?</p> <p>Who pays for the infrastructure?</p> <p>Are the State’s transport authorities supportive of the infrastructure demands?</p> <p>I don’t believe any of this has been thought through.</p>	<p>The City has undertaken a comprehensive demographic and economic analysis of the South Perth Activity Centre to inform the ACP. The population of the ACP area is expected to grow from the current 2,675 people to approximately 4,750 (2,075 additional people) by 2031 and 7,500 (4,825 additional people) by 2041. Using these figures, the ACP area would have a gross residential density of approximately 27 dwellings per hectare by 2031 and 42 dwellings per hectare by 2041.</p>	
				<p><u>Best Practice Planning</u></p> <p>Good planning, let alone best practice planning, does not use fabricated base data, nor does it ignore the fundamentals of the human living environment or the infrastructure demands necessary to facilitate dramatic changes in population density.</p>	Comment noted	
				<p><u>What Should We Expect to be Addressed?</u></p> <p>Planning can be formative and create opportunity for innovation and future proofing.</p> <p>I see none of this in the proposal.</p> <p>I see a plan that provides for residential boxes, standing alone with little reference to their place.</p> <p>There all the usual agreeable words, but little about the real essentials required to cope with the intended dramatic and incremental increases in population and density. The motives are</p>	Comment noted	

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				<p>not about placemaking, they are about building density for developments own sake.</p> <p>The proposals rely on existing infrastructure, existing roads and (sometimes distant) existing green space, all provided by and funded by past generations. A developer's dream!</p> <p>Where are the ideas and provisions for:</p> <ul style="list-style-type: none"> • Flexibility and adaptability of development? • Consistency in an approach to open or public space? • Real ecologically sustainable development practices? • Minimum expectations for developing a sense of place through the urban-scape? • Connectivity between dwellings and between dwellings and greenspace in modern, liveable precincts other than by road? • Macro planning for the separation of vehicles from pedestrians and green spaces? • Minimum expectations for daylight and external views? • A proper philosophy for public art requirements – should it be integrated into architecture or simply plonk art that we experience now? <p>They cannot be found.</p>		
				<p><u>Best Practice Planning</u></p> <p>The WA Planning Commission's planning system is plain and is representative of good practice.</p> <p>It says simply, have a Local Planning Strategy which then informs Local Structure Plans which then informs Local Planning Schemes which then inform Local Planning Policies.</p> <p>An Activity Centre Plan is a subset of a Local Structure Plan.</p> <p>We are considering an Activity Centre Plan but South Perth does not have a Local Planning Strategy. This South Perth Activity Plan is being forced upon the community without alignment on the big picture.</p> <p>Tragically, I understand that it is the WA Planning Commission that is forcing it. This is most improper. One should reflect on the fundamental nature of democracy and the statutory role of Councils within the planning processes.</p> <p>I suggest you look to Victoria's Guidelines for Higher Density Residential Development as a reference for good practice planning. What has been presented is a long way short of this.</p>	Comment noted	

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				<p><u>Public Benefit Contribution</u></p> <p>The proposed Amendment introduces the concept of “Public Benefit Contribution”.</p> <p>This is a monetary payment to Council from a developer for an additional plot ratio for a building higher than the “Base Height” (which is an automatic building limit in the Scheme).</p> <p>The Public Benefit Contribution is not allocated to any public benefit, it is simply a payment to Council in return for approval to construct a higher, denser than allowed building.</p> <p>The benefit is a one off payment, does not flow to neighbours of a development, nor to anyone who will reside in that development.</p> <p>The impact is that all buildings become higher and density increases. It incentivises Council to support larger developments.</p> <p>It is formalised bribery.</p> <p>The losers are existing neighbours to these developments.</p> <p>They lose solar access, open space and views - those things that affect amenity and property valuations.</p> <p>The reality is that such a scheme is designed to diminish the amenity and value of existing properties, enhance profit for short term developers and provide Council more discretionary funds.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p><u>Specific Planning Issues</u></p> <p>Climate Change</p> <p>Whereas there is excellent Australian standards and guidelines for climate change mitigation, there are no reference requirements in the Amendment.</p> <p>There has been no effort whatsoever to consider the issue and, in planning, consideration of climate change mitigation is contemporary good practice in Australia.</p>	<p>DWER request a condition be place on all developments that reflects that the proposed development has adequate flood protection from a 1 in 100 (1%) Annual Exceedance Probability (AEP) flood, which will substantially respond to this concern.</p>	
				<p><u>Placemaking</u></p> <p>In all 148 pages of the draft South Perth Activity Plan report there is one small line that refers to placemaking. This demonstrates the lack of real understanding our Planners have of our place and the importance of placemaking.</p>	<p>Comment noted</p>	
				<p><u>Noise</u></p> <p>The Amendment 61 Provision 4 section c. states for the Mill Point character area:</p>	<p>Development requirement 4.3.3.3 in the ACP requires that <i>development affected by noise from the rail line or Kwinana Freeway shall be designed with due regard to the requirements of State Planning Policy 5.4 Road and Rail Transport Noise and Freight Considerations in Land Use Planning.</i></p>	

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				<p><i>“xi. Amenity impacts from the freeway should be managed with a visual and physical buffer through the use of landscaping, tree planting and low sound walls.”</i></p> <p>The use of the word “should” provides for very arbitrary decision making, very much at the discretion of anyone with development bias or motivated bias.</p> <p>The freeway noise issue has not been managed over successive expansions of the freeway capacity.</p> <p>The State Planning Policy 5.4 (SPP5.4) Road and Rail Transport Noise and Freight Considerations in Land Use Planning deals with a number of matters:</p> <ul style="list-style-type: none"> • Noise mitigation requirements of authorities for new and changes to existing roads and rail infrastructure; • The requirements on planning authorities to determine noise-sensitive zones, to undertake screening assessments and to employ of noise mitigation techniques; and • The requirements for developments within noise-sensitive zones. <p>It also sets the outdoor noise criteria applicable to the emission of road and rail transport noise as received at a noise-sensitive land use. These noise levels apply at 1 m from the most exposed, habitable façade of a building receiving the noise, at each floor level, and within at least one outdoor living area on each residential lot.</p> <p>The noise levels are defined and are:</p> <ul style="list-style-type: none"> • Day (6 am–10 pm) LAeq(Day) = 55dB(A) LAeq(Day) = 60dB(A) • Night (10 pm–6 am) LAeq(Night) = 50dB(A) LAeq(Night) = 55dB(A) <p>At our apartment and for many along the peninsula the noise level typically exceeds 68dB almost at any time during the day or night.</p> <p>It is the obligation of the transport authority when developing such infrastructure to ensure that consequential noise is mitigated to defined limits. It is factual that those limits have been exceeded and it is equally factual that nothing has been done about it.</p> <p>Clearly, we have a circumstance in which the State Government has repeatedly breached its own policy in regard to noise and noise attenuation along the Kwinana Freeway and Perth Mandurah rail line boundary with South Perth.</p> <p>The Amendment proposal does not consider the commitments that must be made to infrastructure to ensure its written objectives are achieved. Traffic is in that category too.</p> <p>Specifically, in regard to the Plan and Amendment:</p> <ul style="list-style-type: none"> • Firstly, there has been no screening assessment. 		

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				<ul style="list-style-type: none"> Secondly, neither the Plan nor the Amendment define or delineate noise-sensitive zones as required by the State Planning Policy. Thirdly, the proposed Plan and Scheme Amendment plans to ‘double-down’ on the State’s breaches by actually planning to allow more intense, higher density development in close proximity to noisy transport infrastructure without noise mitigation measures. This is irresponsible planning and contrary to the State’s Policies. Lastly, the Plan declares our area to have a “residential character” and that the area has a “passive, quiet character”. Despite Government policy, in very practical way the question is <i>“in what way does the increase in density and building of larger buildings along the freeway enhance these characteristics and treat the ongoing issue of noise?”</i> <p>It is far from good planning to propose development without a certainty of necessary consequential infrastructure. The situation with noise will be compounded if the Amendment is adopted as it would ‘bake in’ acceptance of failures of Government.</p> <p>Beyond this however, the proposed Amendment surreptitiously transfers the statutory obligation of the State to mitigate the noise from the freeway to property owners and ratepayers. It is wrong and dishonest. I can only guess at the bias of those who daft such provisions.</p>		
				<p><u>Building Heights and Density</u></p> <p>The concepts expressed in Provision 4 Character Areas for Mill Point are admirable.</p> <p>To the east and north of my residence there has been a height limit of 14m for a long time. Like me, our neighbours have developed and invested on this basis. All of us in our building bought our apartments on the basis of those height limits. They are built in to the tangible value of the properties.</p> <p>Others along Mill Point Road have done the same.</p> <p>We all know that 14m really means 17.5m or so because you can add more building as a “projection” if you keep the space within a notional roof space.</p> <p>Amendment 61 proposes a significant changes to existing building height limits.</p> <p>In our location we would now look out to the north to heights that will change from 14 metres building height to 17.5 metres (after the developer pays the Public Benefit Contribution graft). That means another building level and blocking the established views of those</p>	<p>Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the primary height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>Whilst it is recognised that the existing development 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 (and noting that such a right is also subject to potentially unexpected impacts such as natural disaster response etc).</p> <p>Where no such restrictive covenant or other legally binding agreement exists, a buyer should assume that the planning frameworks may be subject to change and should be prepared for future planning review such as large-scale precinct planning. The detailed structure planning of the South Perth area has been foreshadowed for some time.</p> <p>It is not recommended to decrease the building height limit in this location. However it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	

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				<p>below level 6 facing north. That same blackout will occur to all those along the west side of Mill Point Road.</p> <p>To the east the change will be from 14 metres building height north of Scott St, to 37.5 metres. Our building is 8 storeys high at 29 metres. The proposed Amendment allows 11 storeys (after the developer pays the Public Benefit Contribution graft), blocking out the established views for all our eastern apartment residents and all those along the east edge of Scott St.</p> <p>The visual and solar amenity of the place will diminish. Our sense of space will shrink. The valuation of those properties will fall.</p> <p>This is what is changing:</p> <p>I'll also comment on the Richardson Precinct. The height and density allowances will turn the place in to a cold ghetto. In this day and age, no-one plans like the Amendment foreshadows.</p>		
				<p>Solar Access</p> <p>The Amendment 61 Provision 4 section c. states for the Mill Point character area:</p> <p><i>“v. Taller buildings should aim to minimise undue impacts on solar access and preserve view corridors between buildings wherever possible.”</i></p> <p>The use of the word “should” provides for very arbitrary decision making, very much at the discretion of anyone with development bias or motivated bias.</p> <p>What is “undue impacts on solar access”? Is it that there cannot be any loss of sunlight over a neighbour’s property? A Planner would not interpret it that way. The Planner, under the influence of a developer, gets to decide the loss of amenity and loss of property value of a home and property.</p> <p>It is a convention of good planning and design to define what “undue impacts” in solar access actually means and avoid ambiguity and indiscretion.</p> <p>So, the Plan says “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.”</p> <p>80%! It should be 20%</p> <p>2 hours! It should be 6 hours.</p> <p>What a cold hole the Planners propose that our community should live in!</p> <p>Has this really issues really been considered? Is this how we want future communities to live – 2 hours of sunshine in the middle of winter? This is not the South Perth or Western Australia I know. Is</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	

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				<p>this to be our legacy to future generations? Where is our real sense of place? Where is our obligation to our community?</p> <p>Amendment 61 Provision 4 and related criteria are flawed and wrong.</p>		
				<p>Summary</p> <p>In summary, and as stated earlier, I am of the view that the Council is best served by:</p> <p>a) Ensuring a Local Planning Strategy be completed and approved before any new Schemes are presented for approval to proceed to public comment;</p> <p>b) Rejecting the Draft South Perth Activity Centre Plan and Draft City of South Perth Town Planning Scheme No. 6 - Amendment No. 61.</p>	Comment noted	
48	13 and 20 July 2019	Email	Not Support	<p><u>Email submissions</u></p> <p>The proposed maximum heights are a concern due to impacting views from other existing buildings nearby. Keep the original building height limit of 17.5 metres.</p> <p>Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1</p>	As per Submission 1 response	ACP 11 & 12
49	19 July 2019	Email	Support	<p>Public Art is encouraged</p> <p>Vertical Aged Care is encouraged</p> <p>Opposition to Tier 2 Height limits in High. Agree that the Peninsula precinct is one of the few locations in Perth that high rise density can be retro fitted. 30 storeys should be the maximum. Base height levels are fine and if the T1 and T2 structure is to be retained then my suggestion is to scale back the graduation between the 2 levels from medium/medium-high and high so that the peak is 30 levels. I would also keep the measure as metres in height and not swap to storeys unless you have an equivalent measure that finishes with "whichever is the lower" to avoid creative architects trying to finesse up the number of levels vs absolute height</p> <p>The tavern use should only be strictly allowed subject to surrounding uses and outlook.</p>	<p>Comment noted</p> <p>Aged or Dependent Persons' Dwelling is listed as a 'D' use in all character areas. This provides for some flexibility in approving the use, whilst also providing for control over development.</p> <p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The advantage of measuring height in storeys is that it is easy to interpret and provides incentive for developers to provide greater floor-to-ceiling heights. However measuring heights in metres provides greater certainty regarding the permissible height of buildings.</p> <p>It is recommended that height limits remain in metres to provide certainty regarding building heights; however it is also recommended that a table and explanatory note be added to section 4.1.1 of Part 1 of the ACP to explain the approximate number of storeys that may be possible for each height typology.</p> <p>Tavern is listed as a discretionary land use in Mends and Richardson character areas and is not permitted in Hillside or Mill Point.</p>	ACP - 6

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				Pt 4.3.7 Bike and end of trip; Some discretion to reduce would be advisable on a case by case basis.	Comment noted	
				Pt 4.3.8; no mention is made of the opportunity to provide Hi Flow EV charge stations either by encouragement or compulsion in the ACP. This would be consistent with sustainability best practice, current development trends as well as recognising the emergence of EV's	Comment noted	
				Table 4, non residential car bays; there is an opportunity to reduce the minimum car bay requirements.	Comment noted	
				<p>On the PBC my comments are as follows:</p> <p>7.3 should make clear that one area to spend any PBC monies is the train station.</p> <p>7.3; Use of funds to acquire land for POS purposes should be included</p> <p>7.3 place making initiatives should be secondary to the capital items</p> <p>7.4; The subsequent policy document must include provisions that these monies raised in the ACP area must be spent in the area, must not be a recoup of past expenditure, City admin costs must be directly attributable to the ACP area and be reasonable and justifiable, annual audit undertaken and published, this audit should include a 3 or 5 yearly review of the actual policy and its objectives to ensure it is matching expectations and being achieved in its implementation.</p> <p>7.4; No monies would be raised from the PBC if all developers sit at the Base height and density.</p> <p>7.4; Consideration should be given to a minimum level of PBC contribution for Base level development recognising the addition of density and the pressure that will come from this level of development.</p>	<p>Comments noted</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p>	
				Pt 8.3 Precinct Strategies; the Public Art Strategy must ensure the ACP area receives the benefit of the\$ that are sourced from it.	Comment noted	
				10. ACP Part 2 Explanation Pt 6.3.5/10.2.6; the document identifies that the precinct has underperformed in the tourism area. A limited range of attractions is one of the areas of weakness. What is lacking in this section are clear statements that pursue strategies to improve attractions should be a priority. The response does not address this	Comment noted. The ACP provides a framework and clear vision to inform future work to improve the area, including development of tourism strategies and attractions.	
				11. P321 and A61 Element 7; I support the concept of design excellence and a design competition approach to achieve T2. However I have some specific reservations about how it will actually work.	Comment noted. Policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.	

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				<p>Only 28 days to digest the brief, understand the site constraints and produce the design appears unrealistic and not conducive to a quality design output. 60 days would be more appropriate.</p> <p>Pt 3 and 4; under the open and invited process, the developer is a 50% participant in the decision making therefore could veto but not approve as a majority is needed.</p>		
				<p>The supporting documentation to the ACP (Appendix 2), highlights that the majority of the road links in the area will be operating over capacity, in peak times, by 2031. Either fundamental changes need to occur as to how people use transport such that car trips substantially reduce, or the ACP precinct will be choked with traffic at peak times. At a strategic or policy level it is reasonable to conclude that in the next 10 years fundamental change is likely in this regard. Either a train station is in place or autonomous vehicles or car parking services or a combination of these outcomes could materially alter the traffic generated in the ACP area.</p>	<p>Comment noted.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed.</p> <p>There is a strong focus in the draft ACP on reducing car use in the area and increasing the use of public transport, cycling and walking.</p>	
50	21 July 2019	Email	Support	<p><u>Introduction</u></p> <p>I am a 50% owner of a commercial building on 1333m² of land. Amendment 61, as proposed, impacts significantly on any future development which may be proposed for our site. While I agree with many/most of the objectives of the amendment I do have issues with some of the methodology used in an attempt to achieve these objectives. The issues are listed below using the same category headings as presented in your call for submissions.</p>	Comment Noted	ACP – 11, 12
				<p><u>Land use</u></p> <p>Generally supportive of the land use categories as proposed. The extension of the Mill Point Rd character area is strongly supported.</p>	Comment Noted	
				<p><u>Height and plot ratio</u></p> <p>Our building is sited on Mill Point Rd between Frasers Lane and Ferry St, a section of the Mill Point Rd Character Area with a height type “Medium-High” and with a tier 2 potentially available. While this classification is supported other prescriptive control mechanisms such as, plot ratios, podium setbacks, tower setbacks, floor plate requirements and the requirements associated with design quality, make it particularly difficult to obtain a tier 1 approval and impossible to obtain a tier 2 classification.</p> <p>Given that our site and others like it will only obtain a tier 1 classification at best, because of the size of the lot and the impediments imposed, it is unreasonable that 2 small cadastral units sited between our building and the Esplanade have also been classified as Medium-High. Apart from the fact that two classifications now exist on a single locality (ownership), this punctuated classification is inconsistent with the building size</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>It is not recommended to decrease the building height limit in this location. However it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p> <p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking, also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p>	

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				<p>objectives and should be amended such that there is uniformity across the lots along the Esplanade between Harper Tce and Frasers Lane. That is, as a minimum, the two lots concerned should be shown as Medium height class and not Medium-High. More appropriately, lots currently shown as height type Medium between Harper Tce and Frasers Lane, including the two cadastral units referred to above classified as Medium-High, should be reclassified to height type “Low”. It is inappropriate to allow Medium-High and Medium height classes as currently proposed along that section of the Esplanade.</p> <p>Lots between Ferry St and Frasers Lane along Mill Point Rd currently classed as “Medium-High” should be reclassified to “High” given that Tier 1 is the only option for most lots in this area given the lot sizes and the impediments prescribed by the amendment.</p> <p>Regarding plot ratios I believe that above ground car park space should not be included in the calculation of plot ratio.</p>		
				<p><u>Podiums</u></p> <p>Eight meter podium street setbacks in the Mill Point Character Area are excessive and significantly detracts from design options, particularly on small lots such as ours. A four meter podium setback would be more reasonable particularly if a commercial element is to be introduced at ground level.</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
				<p><u>Towers</u></p> <p>The maximum gross floor plate areas as proposed are too restrictive and penalize smaller lots such as ours. The floor plate area limits as a percentage of total area should be amended from 50% to 60% for base level, from 40% to 50% for tier 1 and from 30% to 40% for tier 2. In addition tower setbacks should be a flat rate rather than a percentage of building height or whichever is larger.</p> <p>The tiered system as proposed will promote buildings which are either the maximum height of tier 1 or the maximum height of tier 2 with limited incentive for building of heights other than these maxima. The proposed flat 10% reduction in floor plate areas between tiers is particularly problematical. For example, on our 78 Mill Point rd site a tier 1 building with have a gross building area (GBA) of c. 8797m² over 20 floors while a tier 2 building will have a GBA of c. 10,130m² over 30fls, a gain of only 1333m² for an additional 10 floors. Should we wish to build a 21 floor building the GBA is reduced to c.7091m².</p> <p>Clearly the required 10% reduction of floor plate area between tiers is excessive and binary preventing design initiative for heights other than the maximum tier heights. I suggest that floor plate reductions</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Tower floorplate area requirements must balance the objective to encourage slimmer towers with the objective to provide attractive and generous balconies.</p> <p>Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.</p> <p>The suggestion to introduce a system where tower floor plate limits reduce incrementally as building height increases may have merit. However, there is no evidence that the tiered system proposed in the ACP and Amendment No. 61 will create a lack of diversity of building heights. It is expected that building height on each site will be determined by the interaction of the different development requirements and that the optimal outcome will vary from site to site.</p> <p>Ongoing monitoring of the documents will be undertaken to assess if this concern is realised. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p>	

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				are applied incrementally. For example, a floor plate reduction of say 1% for each floor would be more meaningful and would be more likely to promote design excellence than the binary system proposed.		
				<u>Design Quality</u> It is unreasonable and inappropriate to impose upon land owners a requirement to conduct a design competition for buildings seeking tier 2 heights. Such design competitions are applicable on public lands but have no place where private holdings are concerned. There already exists mechanisms to assess design quality.	All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel. Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design. Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area. Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits. It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However, policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.	
				<u>Summary</u> In general, TPS amendment 61 imposes a set of prescriptive impediments to any potential development which serve to control building height, size and form. While the objectives of the scheme as proposed are reasonable the associated methodologies suggested to achieve these objectives are too prescriptive and restrictive. This is particularly the case where smaller lots (<1500m2) are concerned. The current classification of lots along the Esplanade between Harper Tce and Frasers Lane currently shown as Height type Medium and Medium-High should be made uniformed with the lots shown as Medium-High reclassified to Medium. In addition that section of the Esplanade should be reclassified to height type Low.	Comment noted	
51	19 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 Response	ACP 11 & 12
52		Email		<u>Low height limit along South Perth Esplanade is crucial</u>	Comment noted	ACP – 2, 17, 19, 22, 23

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	19 July 2019		Neither support nor not support	<p>The 14.4m height limit for buildings along South Perth Esplanade, east of Mends St, recognizes the importance of maintaining the distinctive amenity and aesthetic value of the South Perth foreshore</p> <p><u>Water Authority easement.</u></p> <p>The 3m Water Authority easement running east from Mends St is designed to protect access to the sewerage system. High rise building on this easement at the rear of numbers 97 and 99 South Perth Esplanade is impractical for a number of reasons:</p> <ul style="list-style-type: none"> the sewer is located at or near the toe of a slope approximately (~) 10m high the lot most likely to be redeveloped next, 97 South Perth Esplanade, has retaining walls at the crest and toe of the slope (both ~1.5m high) that would render access from our lot virtually impossible similarly, recent development either side of 97 South Perth Esplanade would present an ~1m high step down from the west and a swimming pool and large trees to the east all of the recent developments, 93 and 95 South Perth Esplanade, have variously, parapet walls, stairs, concrete fire water tank and a basement carpark where excessive groundwater is an issue. These are impediments to accessing the sewer. <p><u>Impact of high rise developments close to the foreshore.</u></p> <p>De-watering problems - In previous developments, the rising water table has disrupted sewerage with a devastating impact on neighbouring properties. Twenty-four hour water pumping is required and this has made bores inoperable. Darley Heights lost its bore when Aurelia was being built. Costly membranes are required to accommodate underground parking to avoid flooding. Consideration must be given to the issue of high rise construction where a high water table creates instability. For example Mascot Towers in Sydney is actually sinking.</p> <p>The shadow cast by high rise buildings cuts out solar access. New owners in the Richardson area are suffering from the shadow cast by a newly constructed high-rise building.</p> <p>Quality - Defective building structures and non-compliant materials in buildings have caused an 'apartment quality crisis' resulting in</p>	<p>Comment noted</p> <p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p> <p>DWER request a condition be place on all developments that reflects that the proposed development has adequate flood protection from a 1 in 100 (1%) Annual Exceedance Probability (AEP) flood, which will substantially respond to this concern.</p> <p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p> <p>Comments noted</p>	A61 – 1, 11, 14-19

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				<p>banks re-valuing apartments to below their purchase price. Quantity must not trump quality.</p> <p>Insurance – Disputes between suppliers and builders can leave owners in limbo when their buildings or fittings are defective. Breaches of national building standards are often unseen, hidden behind brick work but cause major problems. Better safeguards for owners are essential.</p>		
				<p><u>Setbacks</u></p> <p>Building setbacks at the sides and rear of buildings along South Perth Esplanade should be 4m. Ensuring gaps around the residential buildings allows for enhanced landscaping and avoids a dense barrier of continuous buildings which would spoil the view of the foreshore from the city. This area is residential not commercial.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Some minor changes are recommended to street setback requirements to address concerns raised in submissions relating to specific locations.</p>	
				<p><u>Map 2: Building Height and Plot Ratio Limits.</u></p> <p>This map shows the rear of numbers 97 and 99 South Perth Esplanade, in dark blue indicating a 50m or more height limit. The Council has advised that this is an error but it is still part of the proposed Amendment 61. It is crucial that such a major change cannot occur due to a typing/shading error.</p>	<p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p>	
				<p><u>Height Datum to reference entire blocks.</u></p> <p>Height limits must be based on Australian Height Datum and the height limits need to apply to entire blocks. The notion that the slopes at the rear of 97 and 99 could be considered a higher level for the purpose of split-level developments is flawed – they are slopes. Height restriction of 14.4m should apply to the entire blocks on the eastern end of Mends street the same as 93 and 95 South Perth Esplanade.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p>	
53	19 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 Response	ACP 11 & 12
54	18 July 2019	Email		South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
55	18 July 2019	Email	Support	In accordance with State Planning Policy 2.9 Water Resources, future planning and land development should incorporate water sensitive design principles and consider integrated water cycle management, including water supply and efficiency, groundwater, stormwater, wastewater, flooding, waterways and wetlands, consistent with the Better Urban Water Management (WAPC, 2008) framework.	<p>Comment noted.</p> <p>It is recommended to modify the ACP to include objectives and requirements for water sensitive urban design.</p>	ACP – 19, 22, 23

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				The DWER acknowledges that the draft Activity Centre Plan (ACP) includes the requirement for an overall Groundwater Management Strategy to support the ACP (Section 10.2.7) and for development applications to be supported by a Groundwater Management Plan (Section 8.2). Due to development constraints such as proximity to the Swan River, high water tables and limited disposal options, disposal of dewatering effluent has been known to be problematic in some areas of the City. The 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.		
				Please note that the DWER doesn't advise on groundwater clearance requirements or dewatering disposal methods.	Comment noted	
				<p>The DWER suggests that the following additional water resource management opportunities and constraints are also considered in the ACP, particularly within Section 3.3.4 Sustainability, Landscaping and Water Management;</p> <ul style="list-style-type: none"> The DWER encourages the incorporation of Water Sensitive Urban Design principals including opportunities to retrofit existing stormwater infrastructure, which can lead to improved water management, natural features and use of public open space, enhanced recreational opportunities and reduced flooding risk. 	Comment noted	
				<ul style="list-style-type: none"> Groundwater resources in the area are approaching their sustainable limits and therefore the DWER recommends that the ACP should encourage water conservation and efficiency measures to reduce demand on groundwater resources. 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. 	It is recommended to modify the ACP to include objectives and requirements for water sensitive urban design.	
				<ul style="list-style-type: none"> Ensure that the DWER's guiding principles for floodplain management apply; 	Comment noted. The principles have been considered in the preparation of the draft ACP.	
				<ul style="list-style-type: none"> 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. 	<p>The suggestion that the developments have adequate flood protection can be accommodated by placing a standard condition on the development approval by the approving authority. The impact on the floodplain can be considered as part of the stormwater management plans.</p> <p>It is recommended to modify the ACP to include an additional requirement for flood protection.</p>	

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				<ul style="list-style-type: none"> 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. 	<p>Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3.</p> <p>The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping.</p> <p>Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.</p>	
				<p>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.</p> <p>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</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>It is not mentioned 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.</p> <p>Wash can also create damage to:</p> <ul style="list-style-type: none"> pontoons jetties vessels moored to these structures vessels in shallow water or anchored on a foreshore shorelines and river banks. 	<p>Comment noted. The speed of boats on the river is not within the parameters of the draft ACP.</p>	
56	18 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
57	16 July 2019	Email	Neither support nor not support	<p>Strongly supportive of a train station. There is no need to increase the housing density of South Perth using the influx of new residents to justify gaining a train station. It is justified by current residents and visitors.</p> <p>Current bus and ferry transport availability is getting better, especially for later hours, however a train station would complement</p>	<p>Comment noted</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28

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				<p>and bring much needed life to the area. Providing a more direct means for residents to gain access to outlying areas on the train line in a much more timely manner while providing a means to visit the area more easily.</p> <p>South Perth has a high tourist attraction area with the Zoo, relaxing foreshore areas and park events that does not live up to its fullest potential, with limited available parking and entry/exit points. Having a train station would increase foot traffic within the area and provide for a more time efficient means to access South Perth, allowing many people from near and far easy travel to the area. This would negate some of the need to provide extra scheduling of buses for events. It would reduce the impact for on-street parking, police monitoring during events and make transit much safer to and from the area.</p> <p>If South Perth expects to increase to 7,000 people by 2041, which I think is a shrewd idea to look at long term projections, then we need trains, 24 hour ferry and 24 hour buses. I believe a main reason people do not use the public transport is due to uncertainty of operating times, travel time and being afraid of being caught out and not being able to get home.</p>	The draft ACP part 1 section 5 provides guidance for improvements to the movement network, including public transport improvements.	
				<p>Supportive of all the stated objectives relating to:</p> <ul style="list-style-type: none"> consistency with State planning an appropriate and realistic density increase protecting and enhancing character areas limiting height and density to protect existing residents' amenity a non-residential Plot Ratio that encourages retail and business consistent street setbacks that protect the trees and streetscapes no need for podiums in residential areas that reduce green space increased dwellings that still allow manageable traffic excellence in design quality over aiming for quantity improved green spaces with liveable, walkable and safe areas 	Comments Noted	
				<p>NARROWS BRIDGE – MARINA/RESTAURANT/MUSEUM</p> <p>Strongly supportive of expanding the social use of the area at the top of the peninsula for development to provide community activities, boating facilities, exercise, amusement, eateries and entertainment. This area would thrive if a vision and timeframe was put in place.</p>	<p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>Connect South Perth is currently under construction and is outside the scope of the ACP and Amendment No. 61.</p>	

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				South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	
58	14 & 17 July 2019	Email & Feedback Form	Not support	<u>Email submission</u> South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
				<u>Feedback form</u> 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. Reduced heights of skyscraper forests, reduces the need for ugly podiums. The South Perth peninsula does not need forests of skyscrapers. Do not need forest of high-rise skyscrapers in the Peninsula area and / or design exemptions ref height limits 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. 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. 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	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula. Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area. The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth. Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.	
				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.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. Considerations in the LPS are outside the review of the draft ACP and proposed Amendment 61.	

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				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Considerations in the LPS are outside the review of the draft ACP and proposed Amendment 61.</p> <p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	

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				<p>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.</p> <p>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.</p>		
				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.	This comment relates to areas outside the scope of the draft ACP and proposed Amendment No. 61.	
				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.	This comment relates to areas outside the scope of the draft ACP and proposed Amendment No. 61.	
59	16 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	<p>ACP – 7, 16, 17, 18, 19, 22, 23</p> <p>A61 – 2, 7, 8, 11 – 17, 20-28</p>
60	12 July 2019	Email	Not support	<p><i>NB: These comments are referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>Building Heights and Overshadowing</p> <p>My apartment will be starved of direct sunlight. A neighbouring building has reduced the amount of sunlight that enters my property through my east-facing windows.</p> <p>The draft ACP which further increases the allowable height limit to my north from 9-storeys to a staggering 123 metres (36+ storeys).</p> <p>The area covered by the ACP is NOT a green-field site. This is an area where people have lived for many years, and they should NOT be subjected to constant development and massive increases in height</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p> <p>It is not recommended to introduce a specific ratio of width and length, or similar quantitative requirement, to address this matter as there is variation in lot size, shape and</p>	<p>ACP – 7, 8, 9, 10, 11, 12, 17</p> <p>A61 – 13, 14, 15</p>

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				<p>every few years. We purchased our properties in good faith with an expectation that there would be a moderate level of infill with scattered development activity, spaced out over a period of time.</p> <p>If the City’s proposed changes are permitted, I will lose ALL the direct sunlight that enters my apartment during winter. This will have an enormous detrimental effect on the amenity of my property.</p> <p>The proposed text only refers to the effect that a single development will have on its directly adjoining neighbours. It does not take into account the almost certain cumulative effect that shadows from multiple buildings will have.</p> <p>Effectively, this proposed ACP text is saying that a single development can obscure more than 80% of my northern sunlight for all but a 4-hour period on June 21st. And during that 4-hour period, a single property can still obscure 80% of my sunlight.</p> <p>Thirdly, the location of this statement in the draft ACP instead of in the scheme text of Amendment 61 means that this feeble provision is not even binding on the JDAP. They only have to give this text “due regard”.</p> <p>There is no provision for how these so-called “slimmer” buildings are to be oriented. If you want an example of a so-called “slim” building, look at the BHP tower in the CBD. This is slimmer when viewed from the east-west directions, but is extremely wide when viewed from the north-south directions.</p>	<p>orientation across the ACP area. It is therefore more effective to set a performance-based requirement that allows for appropriate solutions to be designed and assessed.</p>	
				<p>The sheer scale of the proposed height increase in the Richardson Precinct, and the large area which it covers, is hard to reconcile with the total amount of increased density that is required by 2041 (as specified in the draft ACP). The proposed scheme amendment opens up significantly more development potential than what is required by 2041. Why the rush? Why can’t we have an orderly, graduated, moderately paced increase in the allowable development potential?</p> <p>The “potential development scenario” images that were provided by the City of South Perth drastically underestimate the amount of development that will occur by 2041 if Amendment 61 is passed in its present form.</p> <p>The existing buildings in the Richardson character area are predominantly older and shorter than the rest of the buildings in the ACP area. They are therefore more likely to be re-developed earlier than other sites. Many adjoining blocks in this area have already been purchased by developers. The height limits in this area are being increased from 9 storeys to 36+ storeys – a significant boon to developers – but something which will have serious adverse consequences for the amenity of existing home owners such as me.</p> <p>I also disagree with the City’s stated character aim for the Richardson Precinct which says:</p>	<p>The character of the South Perth ACP area has been through many iterations over time, each one enhancing or, in some cases, replacing a pre-existing character. The character analysis of the area in Part 2 of the ACP and detailed engagement with the community identified key features that contribute to the character such as wide street setbacks and trees. The ACP picks up these key features and sets requirements to replicate or complement them, whilst also acknowledging that an increase in population in the area will need to be accommodated.</p> <p>It is the aim of the draft ACP and proposed Amendment No. 61 to contribute to the next period of evolution of character for the South Perth ACP area, which includes an increase in the population.</p> <p>Each potential development scenario represents one possible way in which the amount of development expected under the draft South Perth Activity Centre Plan (February 2019) could be distributed. It is not intended to represent exactly what actual development will look like or where it will be located.</p> <p>The actual size, design and location of buildings will vary and development will be subject to requirements for land use, building size and design as per the draft South Perth Activity Centre Plan and proposed Town Planning Scheme Amendment No. 61.</p>	

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				<p>Development opportunities should be maximised in this area, particularly through coordinated development and amalgamation of smaller lots</p> <p>This implies that the City of South Perth wants to put the density growth in this area on steroids. This is backed up by the radical height increases that are being proposed for this area (from 9 storeys to 36+ storeys).</p>		
				<p>A better and fairer way to ensure that the stated density target is reached would be to cap the heights at a much lower level (e.g. 9-storeys), and implement a system of transferable air-rights. Similar systems exist in other jurisdictions such as New York City.</p> <p>Such a system has several major advantages over the tiered height-system that is being proposed by the City of South Perth.</p> <ol style="list-style-type: none"> 1. It is fairer because it places a mutually agreed value on air-space which enables people to be fairly compensated for their loss of amenity. This air-space is a valuable commodity. In Manhattan, the price of “air-rights” per square metre is approximately 12.6% of the value per square metre of a finished apartment. This represents a significant and tangible form of compensation that is paid to residents of Manhattan for their amenity. 2. It allows the total developable volume or an “as-of-right” height limit to be set for an area, but avoids the outcome of buildings that are all the same height. 3. The final built-out density is easily calculated, which makes planning for infrastructure and amenities a much simpler process. 4. It naturally limits the total volume of the buildings in an area, thereby ensuring that an acceptable amount of sunlight is still received by residents. For example, if a development buys the air-rights of its two adjoining neighbours, it will be taller than the “as-of-right” height, but its neighbours are guaranteed to be below this height limit. The immediately adjacent developments will therefore not cause overshadowing, thereby ensuring more sunlight penetration to surrounding residents. 	<p>Transferable air rights allow development rights to be bought and sold between landowners, but does not provide funding for public infrastructure or items that would benefit the users of a given area in general. The only people who would be “compensated” for any loss of amenity would be other landowners, who may not be residents. Residents who are renting, for example, would not receive any benefit.</p> <p>This system would allow buildings to be the same height, if adjacent owners decided not to exchange any development rights. “as of right” height limits are set in the draft Amendment No. 61 and the criteria for exceeding that limit are related to amenity, building design, tower bulk, and provision of a financial contribution to the City to be expended on items that benefit the users of the area.</p> <p>Planning for infrastructure in an established inner-city area such as South Perth is related to many factors including expected density and external factors for example the impact of regional traffic on the road network. There is no “final built-out density” per se, as the area will continue to evolve long into the future. It is not realistic to assume that all possible development sites will be taken up in the foreseeable future and the rate and type of development of the area will depend on many factors including market demand, land ownership and the availability of development sites, and planning requirements. In addition, infrastructure demands change over time depending on many factors including the demographics of the area, age, condition and capacity of existing infrastructure, and technology (including new technology with the potential to significantly change behaviour such as self-driving vehicles). The ACP area is also at the centre of the wider metropolitan area, and is therefore influenced by factors outside of the local area, for example rates of commuting into the CBD from elsewhere in the metropolitan area. It is therefore important that infrastructure planning is regularly reviewed and updated, and that infrastructure is developed in support of a long term vision for the area such as that provided in the draft South Perth Activity Centre Plan.</p> <p>It is more clear and equitable to provide specific requirements for issues such as access to sunlight/overshadowing. These requirements should provide certainty for all parties and directly address the issue of concern. For example if the objective is that buildings should not cause overshadowing of adjacent properties then this should be a requirement, regardless of the size of a particular development the total amount of development in an area.</p> <p>The proposed tier system in Amendment No. 61 requires development above the base height limit to:</p> <ul style="list-style-type: none"> - Reduce the tower floorplate area; 	

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					<p>- Achieve an excellent or exemplary standard of architectural design; and</p> <p>- Provide a public benefit contribution, to be spent on items that will benefit the users of the area.</p>	
				<p>The height limits and plot ratio limits being proposed under the City’s tiered-height system will permit drastically more development than what is required to meet the stated density targets for 2041. There are no safeguards to prevent excessive over-development that exceeds the specified target.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>The hypothetical scenario images provided by the City of South Perth pretend that tall buildings don’t cast any shadows at all. This fairy-tale is significantly more misleading than any indicative shadow modelling would ever be. The laws of physics dictate that these buildings will cast shadows. It is incumbent on the City of South Perth to show the Community what the likely cumulative effects of this overshadowing will be on the area covered by the ACP.</p> <p>In the absence of any shadow modelling being provided by the City of South Perth, I have created four sets of shadow models using the website findmyshadow.com. These illustrate the effect that just 3 buildings could have on my immediate area. I have modelled a different building height in each set of images; 4 storeys, 9 storeys, 22 storeys and 36+ storeys.</p>	<p>The actual size, design and location of buildings will vary and development will be subject to requirements for land use, building size and design as per the draft South Perth Activity Centre Plan and proposed Town Planning Scheme Amendment No. 61.</p> <p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	
				<p><u>Podium and Setbacks</u></p> <p>I support the increased street setbacks of 6 metres in Charles, Hardy and Bowman Streets. These areas should be strictly reserved for landscaping that includes trees and vegetation.</p> <p>I do NOT support the use of podiums in Charles, Hardy or Bowman Streets. The podium walls that have been constructed in this area as</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this</p>	

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				<p>a result of Amendment 25 are a regrettable blight on the area. I have been forced to live next to one, so I speak from first-hand experience.</p> <p>Podium walls are ugly and confronting, particularly when built next to an established property that is not going to be re-developed in the foreseeable future. This should not be permitted to occur. In the Richardson Precinct, it is STILL possible to have NIL side-setback podium walls. The so-called protections offered in section 4.1.2.4 of Part 1 of the ACP and Element 3.3 of Schedule 9B are insufficient to protect residents of existing apartments from having these unsightly podium walls hard up against their boundaries.</p> <p>The relevant character aim for the Richardson Precinct says that “Active street frontages will be concentrated along Labouchere Road, Richardson and Lyall Streets”. As such, it is unnecessary and unwarranted to have nil setback podium walls in Charles, Hardy and Bowman Streets.</p> <p>Ideally, there would be NO podiums allowed in these streets.</p> <p>I believe that a mandatory side-setback of 4 metres is required in Charles, Hardy and Bowman Streets. I also believe that podium walls should be forbidden in these areas, especially if the owner(s) of the neighbouring property object.</p>	<p>discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p>	
				<p><u>Traffic Issues</u></p> <p>The amount of traffic that will be introduced to this area if the proposed changes are approved will overwhelm the ability of the area’s road and public transport network to cope. Already, the #30 & #31 buses are regularly at capacity during the crucial peak hour (standing room only), and these buses run every 5 minutes. The public transport system will not cope with the mass influx of people. As a result, people will use their cars, which will gridlock the intersection of Labouchere Rd and Mill Point Rd. Recent traffic light changes at this set of lights to accommodate even the moderate increase caused by Aurelia have led to lengthy delays (more than 3 light changes) for people trying to get out of Mill Point Rd North.</p> <p>The much vaunted train station will not solve this problem. Firstly, it almost certainly won’t be built in the next 30 years. Secondly, even if it is built, the carriages will be full by the time they get to South Perth Station. This fact was recognised and acknowledged by the planners who created Amendment 25. That’s why they designated the South Perth Station as a destination station and why the Station Precinct was originally intended to be predominantly commercial! This was never a station designed to transport large numbers of people from residential apartments in South Perth into the CBD during peak hour.</p> <p>Even if a train station is built, it won’t solve the traffic problem, so stop using the train station to justify this massive increase in residential density.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p> <p>The capacity of trains will be a consideration in the planning for a new station at South Perth and METRONET in general.</p> <p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p>	

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				<p><u>Richardson Park</u></p> <p>Richardson Park should not be included in the ACP.</p> <p>The fact that the City of South Perth has again included Richardson Park in the ACP area shows how desperate they are to build a train station. The City's Train Station Business Case is predicated on selling off part of Richardson Park to developers as a way of funding the train station.</p> <p>There is no reason that a separate area can't be defined in Amendment 61 that identifies where the public benefit contributions from the ACP can be spent. Richardson Park does not need to be included in the ACP area for this to occur.</p> <p>Richardson Park should AGAIN be removed from the ACP.</p>	Comment noted. The draft ACP and proposed Amendment 61 do not provide zoning for activity on Richardson Park, which is reserved for Parks and Recreation under the Metropolitan Region Scheme.	
61	17 July 2019	Email	Neither support nor not support	<p><u>Draft City of South Perth Activity Centre Plan – Public Realm Mid-Block-Link (Plan 5 and Section 6.3.2 of the ACP)</u></p> <p>Whilst the need for mid-block pedestrian links is considered a desirable town planning and design outcome, the process for identifying the locations and the legal mechanism for implementation requires additional thought and resolution.</p> <p>Location of Mid-Block-Link</p> <p>Insite Planning's clients own multiple, adjacent lots in the Richardson Precinct which are likely to be developed as a single site (i.e. a super-lot). If provided in the location shown on Plan 5 of the ACP, the mid-block-link (MBL) will effectively divide the super-lot, potentially affecting development potential and a desirable design outcome.</p> <p>The provisions need to allow some flexibility about the location of the MBL to ensure it does not affect development potential and/or good design outcomes.</p> <p>Modification: Modify the ACP to permit flexible mid-block link locations.</p> <p>Shared Costs/Cost Recovery Under a perfect situation, the MBL (and its land) should be shared between two (2) or more adjoining landowners. Due to the timing of development however, the MBL might be provided by a single developer/landowner along the side of a lot boundary (i.e. a shared boundary).</p> <p>If the MBL is provided by the initial developer, the above outcome will effectively benefit the adjoining landowner/developer who will not be required to construct the MBL or provide the land. The provisions relating to the MBL need to allow the initial "provider" of the link to recover the cost of constructing the link and providing the land from subsequent beneficiaries.</p>	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	ACP – 4, 5, 6, 27, 28, 33

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				<p>Modification: Modify the DACP to permit cost-recovery for providing a mid-block link.</p> <p>Legal Mechanism</p> <p>There are significant issues associated with the development of public spaces (such as the MBL) on private land. If developed as intended, it is likely the MBL will be shared across four (4) separate lots meaning that liability for maintenance and insurance will be shared (most likely) by four (4) different strata companies.</p> <p>Co-ordinating four (4) different strata companies, each with different strata owners and conflicting commercial/residential ownerships, will be problematic, as emphasized by the questions below:</p> <ul style="list-style-type: none"> • Which strata company co-ordinates the shared MBL? • Will insurances be maintained? • Is there potential for differing strata rules, maintenance schedules, etc? • Could the proper and orderly use of the MBL be affected by changes to the strata rules for individual strata companies? <p>It is recommended the City seek legal advice on how the MBL can be effectively co-ordinated on private land and more importantly, whether the MBLs should be provided on public land with appropriate compensation paid.</p> <p>Modification: Seek legal advice to determine whether there are legal implications associated with mid-block links being provided on private land, and to modify the ACP/Amendment 61 accordingly.</p>		
				<p><u>Draft Local Planning Policy P321 (LPP321)</u></p> <p>Whilst well-intended, the process proposed by LPP321 is flawed from a developer/owner perspective, specifically:</p> <ul style="list-style-type: none"> • It imposes significant cost on the developer (in terms of prizes and payment of professional fees) to design a building which may not be commercially viable or fit-for purpose; • The process assumes the developer is incapable of appointing an architect to design an ‘exemplar’ building which meets the developer’s needs/brief/commercial expectations; and • The process effectively places the developer at arms-length from the design process, approval process (with consideration of commercial terms), end-user needs, review of construction considerations and potential funding implications. <p>Submission strongly supports a process that allows increased height where ‘exemplar’ community benefit, design and development standards are met. It is the submitter’s view that the proposed process will effectively create a three-tier, design-by-committee</p>	<p>Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area.</p> <p>Developments that exceed the Tier 1 height/plot ratio limit must be of exemplary design quality, which is defined in the draft ACP as “being of a standard that provides a high benchmark for design, innovation, and sustainability and is visually striking and memorable in the context of the locality”. In order to achieve this standard the applicant must undertake a competitive design process between a minimum of three suitably qualified architects that is independently assessed in accordance with the City’s South Perth Activity Centre Competitive Design Policy (P321). These requirements reflect the scale and significance of development above the Tier 1 limits.</p>	

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				<p>outcome at the expensive of the developer which may not be commercially functional or viable.</p> <p>Good design is good design. The need for a ‘competition-based’ design process does not need to exist if the City does the following:</p> <ul style="list-style-type: none"> • Develops a clear set of guidelines, principles and statutory provisions which seek to achieve good design; and • Establishes a panel to review any submitted plans. <p>Modification: Modify the ACP and Amendment 61 to delete the design competition provisions and replace with clear design guidelines capable of achieving exemplar development.</p>		
				<p><u>Draft City of South Perth Activity Centre Plan – 3.1.4 Minimum Non-Residential Plot Ratio</u></p> <p>Submitter cannot find a specific definition for “Non-Residential Uses” (only within the Use Class Table). It is recommended a definition of “Non-Residential Uses” is provided within Amendment 61 and the ACP to avoid uncertainty or ambiguity. Specifically, the definition should expressly exclude the following for future projects:</p> <ul style="list-style-type: none"> • Serviced Apartments; • Aged Care; • Medical care; • Retirement Living; • Hotel; and • Any other use which NOT an apartment/dwelling in the traditional sense is not. <p>Modification: Modify Amendment 61 to provide certainty about “Non-Residential Uses”.</p>	<p>Definitions for ‘non-residential’ and ‘residential uses are provided in the Scheme. It is not necessary to repeat these definitions in Amendment No. 61.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p> <p>It is not recommended to change the permissibility of the other use referred to in the submission.</p>	
				<p><u>Draft ACP – 3.1.4 Minimum Non-Residential Plot Ratio AND Amendment 61 – Plot Ratio</u></p> <p>Part 3.1.4 of the ACP describes that carparking and associated circulation space is excluded from Plot Ratio calculations for Non-Residential Uses. The exclusion of carparking for non-residential uses from plot ratio is FULLY SUPPORTED.</p> <p>The definition of Plot Ratio in the text for Amendment 61 (Provision 3 Definitions) states that plot ratio does NOT include:</p> <p><i>(Under dot point 6) “Amenities areas common to more than one dwelling or tenancy (excluding vehicular manoeuvring space or visitor parking at or above ground level and located within buildings)”</i></p> <p>Whilst the above does exclude manoeuvring space (i.e. circulation) and visitors bays from plot ratio calculations, it does appear to</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p>	

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				<p>include all other carparking bays. It is our view therefore that the definition of Plot Ratio in Amendment 61 does include ALL carparking associated with non-residential uses which is contrary to the ACP.</p> <p>Modification: Modify the definition of plot ratio in Amendment 61 to exclude non-residential in accordance with the ACP.</p>		
				<p><u>Town Planning Scheme Amendment 61 – Clause 1.5 ‘Preferred Uses’</u></p> <p>Clause 1.5 describes the preferred uses at ground level for development within the Richardson Precinct. Submit to add Medical, Hotel Reception, Hotel, Hospital, Child Day Care Centre and any other related commercial use to the list of preferred uses to provide greater flexibility of commercial uses at ground level.</p>	Land uses are described in the Use class table to provide guidance. The discretionary uses shown as D or DC provides for some flexibility in approving the use, whilst also providing some control over development. Preferred uses do not preclude other uses that are ancillary or permitted.	
				<p><u>Draft City of South Perth Activity Centre Plan – 3.1.4 Minimum Non-Residential Plot Ratio</u></p> <p>Table 1 of Clause 3.1.4 of the ACP describes that the minimum “non-residential” plot ratio for Richardson Precinct is 1.0 or 30% (whichever is the lesser). Clause 1.5 of Amendment 61 generally indicates that non-residential uses are likely to be provided at ground level.</p> <p>Whilst commercial floorplace at ground level is supported, the magnitude of the 1.0 plot ratio for the submitters’ land is significant, and potentially prohibitive. If the 1.0 plot ratio is applied, in excess of 3,200m² of non-residential uses must be provided. To put this in perspective, 3,200m² is the equivalent to a medium-sized Supermarket.</p> <p>To “fill” 3,200m² of floorspace is a relatively difficult – particularly in the current market. Testament to this is the number of unlet and unsold commercial tenancies available in recently- completed buildings in the immediate area.</p> <p>It is our view, the total plot ratio for non-residential should be capped at (say) 1,000m² to ensure there is not a “glut” of empty commercial floorspace established in the area. A vibrant precinct has people and activity, not significant areas of empty commercial and retail floorspace.</p> <p>Modification: Modify ACP and Amendment 61 to cap retail and commercial floorspace to (say) 1,000m².</p>	<p>Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre.</p> <p>Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. The development requirements only apply in the Mends and Richardson Character areas and combine with preferred uses at ground level to support the development of these areas with a mix of land uses.</p> <p>Notwithstanding, there may be practical reasons why development could be constrained by these requirements, based on demand for commercial floor space. This may either prevent development or result in vacant ground floor frontages.</p> <p>It is recommended to modify development requirement 3.1.4 of the ACP to allow for development to provide commercial grade minimum floor to ceiling heights for the percentage of the development that would otherwise be required to be commercial, so that this area can be converted to commercial at a later date.</p>	
				<p><u>Draft City of South Perth Activity Centre Plan – 3.2.1 Minimum Number of Single Bedroom Units</u></p> <p>Clause 3.2.1 of the ACP describes that 20% of apartments/dwellings shall be single bedroom and/or studio-type. The imposition of mandatory apartment types has not been a success in any part of</p>	The ACP aims to support the growth of a range of household types and the development of a range of housing types, including variety in built form, size and typology. The proposed ratios of dwelling sizes in development requirement 3.2.1 also reflects the requirements of State legislation.	

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				<p>Australia. In the current market, single bedroom apartments are not selling and are a liability to many apartment projects.</p> <p>It is considered the typology of apartments shall be dictated by the market - not regulated on social justice grounds. Developers of residential lots on the fringe of the Metropolitan Area do not have the number of bedrooms regulated. It is unreasonable to impose such a restriction on apartment projects.</p> <p>Modification: Modify the ACP to delete the requirement for single bedroom and studio-type apartments.</p>		
				<p><u>Amendment 61 – Plot Ratio</u></p> <p>The proposed definition of Plot Ratio in Amendment 61 excludes vehicular circulation space at or above ground level (as below):</p> <p>(Under dot point 6) “<i>Amenities areas common to more than one dwelling or tenancy (excluding vehicular manoeuvring space or visitor parking at or above ground level and located within buildings)</i>”</p> <p>AND</p> <p>(Under dot point 3) “<i>Space that is wholly below natural ground level.</i>”</p> <p>It follows, we can conclude the following:</p> <ul style="list-style-type: none"> • All carparking (other than visitors bays) at or above ground level is included in Plot Ratio; and • All carparking below ground is excluded from Plot Ratio. <p>The inclusion of carparking at or above ground level in the plot ratio calculation is a specific concern and impediment for all development projects on the “flatter” sections of the South Perth Peninsula (generally within the Richardson Precinct). This western Peninsula area has unique geotechnical conditions (i.e. flat and near sea level) which effectively means that most basements are likely to experience rock and/or a high water table. The cost of overcoming pumping, water-proofing and water retention associated with being at sea level is generally cost prohibitive. It is understood that several projects in the area have already experienced consequential impacts resulting from these physical factors. In some instances, the water ingress is unlikely to be overcome by current engineering practices.</p> <p>Given the above, it is our view that developers in the Richardson Precinct should not be unnecessarily and unfairly penalised due to ground conditions. In the event the developer attempts to develop basement levels, the cost is likely to be prohibitive. In the event the developer develops ONLY at ground level or above, then height and plot ratio is eroded as a result of unforeseen ground conditions.</p> <p>Based on the foregoing, it is suggested that:</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p>	

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				<ul style="list-style-type: none"> All carparking at or above ground should be excluded from plot ratio; OR (at the very least) There is discretion to vary Plot Ratio calculations where it can be demonstrated that ground conditions prevent to construction of basement carparking. <p>Modification: Modify Amendment 61 to exclude carparking at or above ground level from Plot Ratio calculations (as above).</p>		
62	16 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
63	16 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
64	15 July 2019	Email		<p><u>Building Height.</u></p> <p>Objection to absolute building heights under Tier 2.</p> <p>The requirements to achieve the Tier 2 height under Amendment 61 and the draft ACP are so onerous that it is questionable whether any proponent could reasonably satisfy the requirements to exceed the Tier 1 height limits.</p> <p>Consequently, this would effectively cap the height of buildings within the precinct to the Tier 1 height limits, which would not adequately further the objectives for the development of the ACP area.</p>	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	ACP – 6, 9, 25 A61 – 13-19
				<p><u>Podium Setbacks, Height and Site Cover</u></p> <p>Despite the available discretion, if this provision is inflexibly applied it may result in the proliferation of unnecessary and non-functional side setback areas between new developments. The resultant 8 metre building separation areas have the potential to become unsightly areas of leftover space that present potential CPTED concerns and would not be consistent with the intended inner-city character of the ACP area.</p> <p>The proposed podium height, boundary wall height and boundary wall length provisions, when coupled with the more onerous setback and podium site cover requirements, are overly restrictive.</p> <p>In relation to podium site cover, we suggest that this should be increased from 80% to 90%, or removed entirely, to reflect the recommended setback changes identified above. This is consistent with the intended inner-city character of the ACP area, where</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	

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				generally nil setback development should be promoted to minimise non-functional and potentially unsightly side setback areas that present potential CPTED issues.		
				<p><u>Tower Setbacks and Separation</u></p> <p>Tower street setbacks specified in Table 4, these are generally supported, however we recommend that a provision be included that enables the encroachment of architectural design features, sun shading devices and cantilevered balconies into the specified tower street setbacks areas, consistent with the current TPS6 provisions</p>	<p>Minimum tower setbacks and tower floorplate area requirements will combine to determine tower location. Minimum setback requirements are important to ensure sufficient separation between towers.</p> <p>Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.</p> <p>Ongoing monitoring of the documents will be undertaken to assess if this concern is realised. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p>	
				<p><u>Maximum Tower Gross Floorplate Area</u></p> <p>The concept of maximum gross floorplate areas for the tower elements is supported and is considered a more appropriate method for controlling the bulk and scale of development than arbitrary plot ratio limits, as discussed below. However, we would recommend that the Tier 2 requirements are increased to 40% for the Mends, Mill Point and Richardson Character Areas, to provide greater flexibility in design and enhance the feasibility of development in these key areas.</p> <p>We would also recommend that a provision be included to clarify that the floorplate area calculation does not include any architectural features or sun shading devices, consistent with the above recommendations in relation to tower setbacks.</p>	<p>Tower floorplate area requirements must balance the objective to encourage slimmer towers with the objective to provide attractive and generous balconies.</p> <p>Tower floorplate area limits have been set in accordance with the objectives set out at section 4.1.4 of the draft ACP. It is not recommended to increase tower floorplate area limits.</p>	
				<p><u>Plot Ratio</u></p> <p>Recommend that the proposed overall plot ratio requirements under Element 6 of Amendment 61 be removed on the basis that plot ratio is an arbitrary control that has no direct relationship with good amenity outcomes in high density precincts. Amenity outcomes are more appropriately controlled by other built form controls such as podium heights, setbacks and maximum tower floor plate requirements.</p>	Comment Noted.	
				<p><u>Design quality</u></p> <p>Strongly object to the proposed requirement under Amendment 61 to undertake a competitive design process between at least three architectural firms in order to qualify for assessment under the Tier 2 height and plot ratio requirements. This is considered to be an unnecessary and onerous requirement from a cost-efficiency point of view, noting that the City has an established Design Review Panel whose role is to work with the proponent's design team to ensure that proposals meet the requisite level of design quality.</p>	<p>Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area.</p> <p>Developments that exceed the Tier 1 height/plot ratio limit must be of exemplary design quality, which is defined in the draft ACP as “being of a standard that provides a high benchmark for design, innovation, and sustainability and is visually striking and memorable in the context of the locality”. In order to achieve this standard the applicant must undertake a competitive design process between a minimum of three suitably qualified architects that is independently assessed in accordance with the City's South</p>	

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					Perth Activity Centre Competitive Design Policy (P321).These requirements reflect the scale and significance of development above the Tier 1 limits.	
				<p><u>Approval for Additional Development Potential</u></p> <p>Have concerns regarding the methodology that has been proposed for determining eligibility for additional building height and plot ratio. In particular, we strongly object to the provisions pertaining to the payment of a public benefit cash contribution in order to qualify for assessment under the Tier 1 and Tier 2 provisions. The cash contribution system is highly punitive, and there is insufficient nexus between the bulk and scale of a building and the requirement to contribute potentially millions of dollars to an unresolved fund with no certainty as to how this money will be utilised by the local government.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p><u>Minimum Non-Residential Plot Ratio</u></p> <p>Question the inclusion of a minimum non-residential plot ratio requirement of 1.0 for sites within the Richardson and Mends Character Areas without any specific acknowledgement that variations can be considered, or an explanation how such a variation could be achieved.</p>	<p>Section 3.1.4 of the draft ACP states that the provisions are to provide for growth in local services and employment opportunities. The provisions only relate to Mends and Richardson Character areas and combine with preferred uses at ground level to provide activation.</p> <p>There is opportunity to consider provisions to allow the development of some floors to convert at a later stage to alternative non-residential or residential uses. This could be mechanisms such as minimum floor heights for areas that would otherwise be required to be committed to commercial requirements.</p>	
				<p><u>Dwelling Diversity</u></p> <p>Question the need to include minimum percentage requirements for single bedroom dwellings and dwellings with three or more bedrooms. Ultimately, it is considered that housing should seek to respond to market demand in the locality, and therefore we would contend that this requirement should be removed.</p>	<p>The ACP aims to support the growth of a range of household types and the development of a range of housing types, including variety in built form, size and typology. The proposed ratios of dwelling sizes in development requirement 3.2.1 also reflects the requirements of State legislation.</p>	
				<p><u>Street Interface</u></p> <p>It is unclear why individual ground floor tenancies should be restricted to between 6 and 9 metres wide at the street frontage, when articulation and activation can be achieved in a variety of different ways through appropriate architectural treatments.</p> <p>the requirement for sections of blank wall to not exceed 2 metres in length at active street frontages is likely to be extremely difficult to achieve taking into account the need for on-site loading docks and waste servicing areas, and necessary utilities infrastructure</p>	<p>Retail and commercial units are to be articulated with a width of between 6 and 9 metres in active streets to ensure variety and a human scale are maintained in the street interface. This contributes to creating an active pedestrian-friendly environment.</p> <p>This requirement is included in the draft ACP and so can be varied if there is sufficient justification that the objectives and desired outcome will be achieved in an alternative way.</p>	

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				<u>Interface with Heritage Buildings</u> recommend that subclause 4.3.2.1(a) is removed, for the following reasons: The provision is unnecessary, as the ability to vary the setback requirements (and potentially require increased setbacks) is already established under Clause 12 of the Deemed Provisions contained within the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>	Comment noted. The town planning scheme refers to heritage properties. Extra protection is also given through section 8.2 of the draft ACP which may require a heritage impact assessment.	
				<u>Deep Soil Zones</u> provisions should be removed entirely	Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3. The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping. Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.	
				<u>Floor to Ceiling Height</u> Whilst generally supported, the viability of providing these identified floors to ceiling heights would be compromised if the absolute height limits contained within the draft Amendment 61 provisions are retained.	The ACP sets minimum floor to ceiling heights and requires high standards of architectural design. These requirements combine to encourage generous floor to ceiling heights as a component of high amenity apartments. It is recommended that height limits remain in metres to provide certainty regarding building heights; however it is also recommended that a table and explanatory note be added to section 4.1.1 of Part 1 of the ACP to explain the approximate number of storeys that may be possible for each height typology.	
				<u>Car Parking Provision</u> note that the minimum non-residential parking requirement of 2 bays per 100m2 of net lettable area is still well in excess of the prevailing market demand for many non-residential land uses (such as office etc.).	Comment Noted	
				<u>Access to On-Site Parking</u> Section 4.3.8.2 of the draft ACP seeks to apply a restriction of a maximum of one (1) crossover per development. Whilst the intent of minimising disruption to the adjoining pedestrian realm is noted and supported, this provision has significant implications on the ability for developments to accommodate on-site waste collection.	The suggestion that it may be desirable for sites with more than one street frontage to provide access from more than one frontage has merit. There are a number of reasons why more than access point may be desirable, particularly on larger sites, including to manage access to parking and waste collection areas within buildings. It is recommended to modify the relevant development requirement in Part 1 of the ACP to reflect this suggestion.	
65	18 July 2019	Email	Not support	Concerns for the development of South Perth are that it would be appropriate, sensitive to the area and retain the character and have manageable traffic and transport options.	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23

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				Remainder of submission is the same as South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response		A61 – 2, 7, 8, 11 – 17, 20-28
66	12 July 2019	Email		<p>Proposed Amendment No.61 has a dramatic effect on small lot owners' ability to develop their properties without joining with adjacent land owners.</p> <p>My lot is 594.73 square metres. With front setback of 6 metres, side setback of 4 metres and rear setback of 4 metres, the building envelope is reduced to 196.01sqm or 32.957% lot coverage.</p> <p>Goal four of the South Perth Peninsula Place and Design Report is; "Encourage Responsible Development". Not being able to develop anything of any commercial viability is not encouraging responsible development.</p> <p>It is noted that City of South Perth has the right to reduce the side setback of 4 metres to nil as long as it does not unfairly affect the neighbour. Given that this discretion sits with the City of South Perth, there is uncertainty that affects the development risk potential of the lot owner.</p> <p>If granted the nil side setback, side setbacks still need to apply after the required podium height of 2 or 3 storeys making for very impractical, skinny residential tower above, or no tower at all, meaning no economies of scale and therefore no profit margin.</p> <p>Lots that are in between developed lots will in effect stay as old undevelopable buildings, creating a distinct problem for the vision of ACP. Examples already exist in 28 Charles Street and 19 Hardy Street. Even if there are a number of undeveloped lots together there is no way people can be made to join up and include all lots.</p> <p>We need a planning scheme that allows individual owners to have the free will to do something viable with their small lots that also meets the needs of connecting with the street in a mixed use zoning.</p> <p>I personally would like to do my own development and do not want the increased risk of getting involved in a huge commercial and residential build. As a member of a project committee for a residential development in the precinct area (which remains mostly unsold) I know all too well how difficult that can be, given the state of the apartment market and commercial vacancy rates. Bigger is not always better.</p> <p>The inability to develop small lots will obviously reduce the market value of those lots so owners will just continue to sit on them, potentially waiting for changes that may allow them to develop in the future and accordingly win back some of their lost value.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	ACP – 9 A61 – 13-19
				The ACP part 7.1.4 discusses the street interface. It would appear that a front setback of 6-10 relates to areas of mid - residential character north of Judd Street. Charles Street is Mixed residential with a commercial plot ratio of 1. The ground level will be businesses	Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing	

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				<p>that need to interact with the population moving to the Zoo from the future train station. Permitted uses include cafés and restaurants. These businesses therefore require to be at nil setbacks to gain this interaction.</p> <p>Currently the road reserve plus the council land is 20 metres wide. Adding another 12 metres in the form of a street setback is not linking the business activity with the streetscape. To add confusion there are also images in the South Perth Peninsula Place and Design document that reflect a probable zero setback and a vibrant street interface with a before and after graphic in Charles Street, not a 6 metre setback.</p>	<p>character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>Under the current proposed amendment No.61 my lot at 10 Charles Street South Perth, and all the others in the same situation, will not be able to be developed. The outcome will be stranded small lots dotted throughout the precinct, which is highly undesirable for all.</p> <p>Small lot owners should not be told that in order to develop you simply need to join with a neighbour or two. Such a scheme increases risk based on increased scale for small lot owners who themselves may want to develop. Selling 6 apartments is a lot easier than selling 20.</p>	<p>The vision for the Richardson character area is for a variety of lot sizes and building heights to be developed to higher density overall in order to take advantage of the high accessibility of the area and to support development of the South Perth train station. In order to achieve this it is necessary to encourage the amalgamation of lots to form larger development sites, while also allowing smaller buildings to be developed on smaller sites.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>The side and rear setback requirements are necessary to manage development on larger lots to protect the character and amenity of the area. At the same time, it is important to provide sufficient flexibility to allow smaller sites to develop where appropriate.</p> <p>It is not recommended to reduce street setbacks in the Richardson character area, as street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p>	
				<p>Recommend that for mixed use areas that require the vibrant interface with the public and streetscape, nil front and side setbacks for appropriate podium height need to be established. In addition, small lot owners need be able to develop their lots independently of large-scale developments.</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
67	11 July 2019	Letter	Neither support or not support	<p>The proposed Scheme Amendment has been considered for its potential impact on heritage places within the Scheme area and the following advice is given:</p>	Comments Noted.	ACP – 14, 15, 16, 18

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				The proposed Scheme Amendment provides for clear guidance on the development potential on the activity centre area.		
				<p>The South Perth Activity Centre Plan – Draft for Consultation, 4.3.2 Heritage Section, should include a list of the following State Registered Places:</p> <ul style="list-style-type: none"> • 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) 	Section 4.3.2 mentions the list of places on the local government’s heritage list. An additional reference is recommended to be added referring to the State Heritage listed properties.	
				The Amendment Report, Section 5 Policy Framework should include reference to SPP3.5.	The town planning scheme refers to heritage properties. Extra protection is also given through section 8.2 of the draft ACP which may require a heritage impact assessment.	
				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. The allowable building height for the blocks immediately opposite the Zoo between Hardy and Richardson Streets will have an impact on the microclimate of the Zoo and its significant botanical plantings. Consideration 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.	<p>Properties immediately adjacent to Perth Zoo on Labouchere Road cannot be taller than approximately 17 storeys (the Pinnacles building is 20 storeys). In addition, the impact of shadow on the Zoo has been taken into consideration and each development will be assessed on its merits.</p> <p>It is reasonable to include specific provisions in Amendment No. 61 that ensure the Zoo is protected from overshadowing.</p> <p>A modification to the ACP is recommended to add an objective and requirement to limit overshadowing of the Zoo.</p>	
68	11 July 2019	Email	Support	<p>I received a printed statement in my letterbox titled “Urgent Message – Act Now to Protect Your Investment”. While it should be commended that residents are involved in their community, a large portion of this statement was misleading and I am concerned that the opinion of a vocal minority may have detrimental effects on the amenity, investment and future liveability of the suburb. I have provided some responses to these comments below to provide a balanced perspective.</p> <p><i>1. “Are you aware that the City of South Perth Councillors have approved a plan to increase building heights on the foreshore from existing 25m level to 37.5m from Fraser Lane to Mend Street?”</i></p> <p>This comment is misleading because allowable height is not a given. A prescribed height in any planning scheme informs what maximum would be entertained based on argued merit to the site and surrounding amenity.</p> <p>Western Australia has the strongest planning legislature, requiring any proponent to meet deemed to comply and merit principles of</p>	<p>Comments noted.</p> <p>(The alternate position is noted in Submission 1 Response)</p>	-

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				<p>the new Design WA guidelines, the local planning policies, the government architect and an appointed Design Advisory Committee. All of this is designed to ensure each new development addresses not only what should be considered good design for that site, but also for the locality.</p> <p>Unless an applicant can prove without reasonable doubt that their development application is a benefit, nothing of the application is treated as a given. In particular; height.</p> <p>As an example, a good design response may actually mean that while the height achieves the 37.5m allowable limit, the footprint of the building is reduced to such a scale, that nearby residents have increased view angles and decreased overshadowing.</p> <p>A generalised opinion that height is bad will frequently result in no growth and no benefit to the area. It could be argued that empty and derelict lots adjacent to our homes hinder growth of our investments. An active, liveable street with complimentary amenity results in a growing, sought after address.</p> <p><i>2. “This will mean newly completed apartments such as REVA and QUEST will be overshadowed and buried some 12.5m below any high rise development that are certain to occur on the foreshore.”</i></p> <p>This comment is misleading as again, nothing is “certain”, and any development application will require to address these concerns in its specific design and site response.</p> <p>Shadows are cast on every visible point of this planet, in various forms depending on our sun’s position at that time of day and year. Whether that is a two-storey home in the suburbs onto the adjoining single storey home, whether it is Reva overshadowing onto the Aurelia residents, or the 21 storey Aurelia building overshadowing onto the future Civic Heart residents.</p> <p>“Buried” is an emotive word that does not represent the scale comparison of an 11 storey building adjacent to a 9 storey building (less than 20% increase – i.e. a very shallow grave).</p> <p><i>3. “With the recent demolition of a residence on the NE corner of Harper Terrace and a derelict home on the NW corner of Harper Terrace and older units next to it, it is obvious high-rise developments will occur on these parcels of land”</i></p> <p>It is “obvious” that land in South Perth has always undergone transformation and growth in scale and height. South Perth is a pioneering suburb of high density living and home to some of Perth earliest high-rise architecture, which led to the establishment of the foreshore as a high-rise precinct of Perth. i.e. Aurelia Apartments.</p> <p>When undertaking due diligence on a residence, it was “obvious” that the adjacent landowner has the same right to consider a high-</p>		

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				<p>rise development, much like the landowner who developed my apartment.</p> <p>It should be noted that the North West corner of Harper Terrace has recently been approved as a carpark.</p> <p><i>4. “Even without development occurring, the zoning height change alone will dramatically affect your capital values.”</i></p> <p>A generalised opinion that height is bad will frequently result in no growth and no benefit to the area. It could be argued that empty and derelict lots adjacent to our homes hinder growth of our investments. An active, liveable streetscape with complimentary amenity results in a growing, sought after address.</p> <p><i>5. Any development will also have a downward impact on rental returns for Aurelia, Reva and Quest, if views are affected.</i></p> <p>Should a development directly north of Reva or Aurelia ever be approved to an 11 storey height limit rather than a 9 storey height limit, the unknown (no proposed plans to review) impact will effect approximately 6 – 9 units’ views.</p> <p>While the rental return decrease due to views is unknown, also unknown is the rental increase that additional ground floor active tenancies will bring in the new development. With a growing population on the street and a planning department enforced active ground floor uses such as cafes, restaurants and shops; suitable businesses will likely provide further amenity to the street’s residents, increasing liveability and suburb value.</p> <p><i>6. “Both Reva and Quest will lose the winter thermal benefits of the northern sunshine which greatly contributes to minimal use of air conditioning and in Reva’s situation, the solar heated swimming pool will be shadowed, rendering the pool’s solar heating equipment less effective. Aurelia will also suffer some degree of winter thermal heating loss, resulting in higher use of air conditioning”</i></p> <p>Any future development to the north which is at the same scale as Reva or Quest will affect passive winter heating to the northern units. Again, this is obvious, known at time of due diligence/investment. Any addition to the previously allowable height does not increase this impact, nor change an established fact.</p> <p>Perth’s winter solstice sun angle is 34.5 degrees. When this is tracked with the northern site setback on the Reva site, along with the possible future southern site setback of the site directly to the north; it will be shown by any future development applicant that the overshadowing does not even reach the rooftop solar system.</p> <p>The Reva pool is so cold as it is, I wonder if anyone has actually seen someone in it during winter?</p>		

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				<p>Based on the Perth winter sun angle, it should be noted that no future northern development will cast a shadow on the Aurelia building in addition to what the Reva building already casts.</p> <p>Current energy efficiency requirements in WA require apartments to achieve a minimum NatHERS energy rating that exceeds that of a single house. This means as an apartment owner, you will likely be already using the air-conditioner less and doing more for the environment.</p> <p><i>7. “In the case of Aurelia many north facing apartment owners, mainly retirees paid FINBAR a premium of up to \$250k EXTRA for their views beyond the 25m “Clear View Line” which was heavily promoted by FINBAR and its selling agents. Many AURELIA residents will not only lose their clear views but will suffer substantial financial losses of up to \$350k when stamp duty and commissions are factored in. Demonstrate your anger and dismay at this proposal.”</i></p> <p>Historic sales advice from a sales agent should not constitute grounds for good planning decision making. While an agent may have advised of current planning regulations, a council planning scheme and policies are organic and respond to population growth and good place making principles. Most residents choosing to live in a low maintenance apartment lifestyle may have grown up on a 1000sqm lot, which over time will have been rezoned and capitalised on by subdividing, leading us to a financial position in retiring in a South Perth apartment. That is the nature of a growing city.</p> <p>Increased height and density leads to an increased population which requires complimentary health services and businesses. For example, the optometrist soon to be opening in Aurelia which will complement the necessities of convenient retirement living.</p> <p>Good place-making results in liveable communities regardless of age, and increases how sought after the address is, hopefully resulting in long term financial gains.</p> <p><i>8. “Interesting to note that on the 6/03/19, the City of South Perth held a Special Meeting where the Councillors unanimously approved a scaling back of building heights along the Esplanade from 24.3 to 17.5m from the Narrows Bridge up to Fraser Lane but unfairly ignored the impact of higher levels from Fraser Lane to Mend Street where 37.5m proposed!”</i></p> <p>Regardless of the author’s connotations, there is nothing “interesting” about this sensible and practical decision made by a council fully briefed on planning benefits by a planning department whose invested profession it is to design liveable communities.</p> <p>Limiting heights to the west of our site will not only mean view corridors are available; it will also mean density is limited where complimentary servicing of that population is limited.</p>		

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				Mends Street and Harper Terrace are identified as the “CBD” of the City of South Perth, it is an area where density is increased as it can be accommodated by complimentary businesses and transport. Much like Perth City, and any city worldwide; height is at the highest point in the centre and feathers down as you move away from the city and critical services that complement the residents.		
69	9 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. The City of South Perth Council’s rationale used in scaling back the heights on South Perth Esplanade should be equally applied further along the foreshore east of Fraser Lane to Mends St for the owners of Aurelia, on grounds of fairness and equity. The height limit should be reverted back to the original 17.5m in uniform with all the land fronting Aurelia, as in the case for Esplanade.	As per Submission 1 Response	ACP 11 & 12
70	8 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	As per Submission 1 Response	ACP 11 & 12
71	16 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1 As a worst case scenario the area from Fraser Lane to Mends Street should not exceed a building height limit of 25 metres in total and setbacks from the road should be uniform with the remainder of the Esplanade at 12 metres, not the proposed 3 metres. As a substitute for the loss of "density " along the South Perth Esplanade some high rise should be considered for the "Hillside "suburb OR some juggling of the Tier 1 heights by an extra floor level for the medium-high area from 57.3 metres to 60.3 metres should be considered.	As per Submission 1 Response	ACP 11 & 12
72	2 July 2019	Email	Not support	The submitter’s land is 595 square meters and only 14 meters wide. Objection to the proposed amendment for the following reasons: <ul style="list-style-type: none"> the draft proposal will only leave a strip of land approx. 6 meters in the centre of the block available to build and develop. the plan restricts the ability to develop the property as a small development, similar to No 7 Lyall Street, with an additional two storey apartment on the top floor If adopted the setbacks required will prevent the landowner from achieving a small and attractive development of this property 	Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.	ACP – 9 A61 – 13-19
73	19 June 2019	Email	Not support	The proposed method of measuring building height above natural ground level would allow for taller building on the southern part of lots 29, 116, 31, 100 South Perth Esplanade due to the steep slope on these lots. It would be possible to design a building exceeding the envisaged base building height limit of 14.4 metres, by almost	Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.	A61 – 1, 11

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				double, going up to 25.9 metres in height. This would negatively affect the amenity of some substantial existing buildings behind. Should revert to the existing Town Planning No. 6 definition of building height limits in this specific area, based upon Australian Height Datum.	The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres.	
74	5 June 2019	Email	Neither support nor not support	Submission about the Richardson character area. Supportive of the ACP providing certainty for landowners regarding what can be developed.	Comment noted	ACP – 4, 5
				The mandatory mixture of commercial and residential land use on the same site should be removed to enable greater flexibility for the landowner to consider a range of development options including: <ul style="list-style-type: none"> • 100% residential • 100% commercial • A mixture of commercial and residential This would allow the landowner and the market to decide what will be developed on a given site based on what is achievable and financially viable. The proposed Amendment No. 61 is too onerous on the developer and limits the extent to which development can respond to market demand.	Section 3.1.4 of the draft ACP states that the provisions are to provide for growth in local services and employment opportunities. The provisions only relate to Mends and Richardson Character areas and combine with preferred uses at ground level to provide activation. There is opportunity to consider provisions to allow the development of some floors to convert at a later stage to alternative non-residential or residential uses. This could be mechanisms such as minimum floor heights for areas that would otherwise be required to be committed to commercial requirements.	
				The requirement for a minimum commercial plot ratio of 1.00 should be removed. This requirement, along with the non-residential parking requirements and the issues with providing underground parking due to the high water table, make development financially unviable and result in high vacancy rates that impact the vibrancy of the area. The minimum plot ratio, minimum podium height and the car parking requirements make it impossible to do a small development (for example a medical centre) that is financially viable and functional.	Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre. Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. The development requirements only apply in the Mends and Richardson Character areas and combine with preferred uses at ground level to support the development of these areas with a mix of land uses. Notwithstanding, there may be practical reasons why development could be constrained by these requirements, based on demand for commercial floor space. This may either prevent development or result in vacant ground floor frontages.	
				Commercial development should be primarily focussed in the Mends character area, as the commercial centre of the ACP area.	It is recommended to modify development requirement 3.1.4 of the ACP to allow for development to provide commercial grade minimum floor to ceiling heights for the percentage of the development that would otherwise be required to be commercial, so that this area can be converted to commercial at a later date. Development requirement 3.1.4 does not prevent development of sites with 100 percent non-residential floor space.	
				The maximum car parking requirements and unit sizes should be removed and left to the developer and the market to decide how	The ACP aims to support the growth of a range of household types and the development of a range of housing types, including variety in built form, size and typology. The proposed	

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				<p>many car bays are required and what size apartments are required by the market place.</p> <p>For example, a typical family has a husband and wife with a car each, and usually one or two children with cars. Therefore, the concept of a maximum of two car bays for apartments basically rules out a family being able to reside with cars in the area.</p>	<p>ratios of dwelling sizes in development requirement 3.2.1 also reflects the requirements of State legislation.</p> <p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>The conditions that proposed Amendment 61 puts on the landowner to qualify for the bonus plot ratio and building height (Tier 1 and 2) should be removed from the Scheme as they are totally impractical for any Developer to comply with.</p> <p>Developments that could achieve the increased plot ratio and building height would be projects with development costs in excess of \$50 million and the requirements under Amendment 61 are totally impractical for the following reasons:</p> <p>Architectural Design Competition: It is unrealistic that the land developer, who takes 100% of the development risk, should be swayed by someone else's opinion on the design panel as to what should be developed.</p> <p>The land developer has to pay for three independent development concepts to be prepared for consideration by people that DO NOT OWN THE LAND. It even gets down to basics, for example the developer might like square balconies and the Panel may like oval shaped balconies.</p> <p>The cost to get a typical \$50 million development to development approval stage using one architect only is already approximately \$2 million.</p> <p>The developer should be able to choose their own architect to design within the Council guidelines, and then make a commercial risk decision based on their understanding of what the market place requires, without having to engage two additional architects and teams of consultants to put up additional proposals to the Council for independent panel members to have the final decision as to what is to be developed.</p> <p>If a developer had to engage another two architectural firms along with other supporting consultants, this would add an additional \$4 million to the development costs of the project. It is unrealistic to think that a developer will be led towards a design solution by people that they do not know or that have no financial skin in the game.</p> <p>The onus should be on the land developer to engage an architect that is able to work with the City's independent Design Review Panel to achieve the required level of design quality, in accordance with</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	

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				<p>the existing established process in South Perth. The architectural design competition simply adds unnecessary front-end project costs, when a functional design review process can achieve the same outcomes in a more efficient and cost-effective manner.</p> <p>Public benefits contribution: The concept of the developer having to pay vast sums of money to the City in order to develop to the Tier 1 or Tier 2 plot ratio and building height limits under Amendment 61 is just an opportunistic money grab by the Council that should be removed entirely. In the event that the developer elects to develop to the Tier 1 or Tier 2 height and plot ratio limits, there will be additional rates and taxes collected by the Council at that stage, and that is only if the project gets completed, rather than taxing the developer at the development application stage.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
75	16 July 2019	Email	Not support	Remainder of submission is as per the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
76	24 Jul 2019	Letter	Support	<p><u>Land Use</u></p> <p>1. To what extent do you support the objectives for land use in the draft ACP? – Objective iii. – Strongly support Objective iv. – Strongly support Objective v. – Strongly support</p> <p>2. To what extent do you support the requirements for land use in Schedule 9B of proposed Amendment No. 61? – Strongly do not support</p> <p>3. What changes would you suggest to the requirements for land use in Schedule 9B of proposed Amendment No. 61?</p> <p>1) 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 &</p>	<p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p>	A61 - 6

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				<p>employment, faces Mends St beach node, and is near the Mends St retail area & ferry.</p> <p>2) Further, all of the following Mends character area land uses should be Permitted (P): Hotel, Mixed Development, Serviced Apartment, Tourist Accommodation, Tourist Development. Reasons: i) planning & investment certainty are needed in these land uses in order to achieve ACP objectives of high employment, visitor intensity, activity & vitality around existing ferry node; ii) Bed & Breakfast Accommodation is already Permitted in proposed Table 1.</p>		
				<p><u>Building size (Height and Plot Ratio)</u></p> <p>1. To what extent do you support the objectives for building height In the draft ACP?</p> <p>Objective iii. – Strongly support</p> <p>Objective iv. – Strongly support</p> <p>Objective v. – Strongly support</p> <p>2.To what extent do you support the objectives for plot ratio In the draft ACP?</p> <p>Objective i. – Strongly do not support)</p> <p>Objective ii. – Strongly do not support</p> <p>Objective iii. – Strongly do not support</p> <p>3.To what extent do you support the requirements for building height and plot ratio In Schedule 98 of proposed Amendment No. 61 - Support</p> <p>4, What changes would you suggest to the requirements for building height and plot ratio In Schedule 9B of proposed Amendment No. 61</p> <p>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.</p> <p>5.Do you think the proposed tier system for building height and plot ratio limits In Schedule 9B of proposed Amendment No. 61 are appropriate? - No</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development/population is within walking distance of the Mends Street ferry terminal. The subject lots referred to in this submission are close to the ferry terminal and are proposed to follow the general tiering of the surrounding area, thus being identified as the Medium and the Medium-High height types with Tier 1 development potential.</p> <p>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.</p>	
				<p><u>Podiums</u></p> <p>1. To what extent do you support the requirements for podiums in Schedule 9B of proposed Amendment No. 61? - Neutral</p> <p>Objective i. – Support</p>	Comments Noted	

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				<p>Objective ii. – Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Support</p> <p>2. To what extent do you support the requirements for podiums in Schedule 9B of proposed Amendment No. 61? - Neutral</p>		
				<p><u>Towers</u></p> <p>2. To what extent do you support the objectives for tower floorplate size in the draft ACP?</p> <p>Objective i. – Strongly support</p> <p>Objective iii. – Strongly support</p> <p>Objective iv. – Support</p> <p>3. To what extent do you support the requirements for tower setbacks in Schedule 9B of proposed Amendment No. 61 – Neutral</p> <p>5. To what extent do you support the requirements for lower floor plate area in Schedule 9B of proposed Amendment No. 61? – Strongly Support</p>	Comments Noted	
				<p><u>Design quality</u></p> <p>1. To what extent do you support the objectives for design quality in the draft ACP?</p> <p>Objective i. – Support</p> <p>Objective ii. – Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Neutral</p> <p>Objective v. – Strongly do not support</p> <p>3. To what extent do you support the requirements for design quality in Schedule 9B of proposed Amendment No. 61? - Neutral</p> <p>4. What changes would you suggest to the requirements for design quality in Schedule 9B of proposed Amendment No. 61?</p> <ul style="list-style-type: none"> All developers encouraged to provide high line links. 	Comments Noted	
				<p><u>Additional Development potential and public benefits</u></p> <p>1. To what extent do you support the objectives of the draft ACP?</p> <p>Objective i. – Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Support</p>	<p>Comments Noted</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and</p>	

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				<p>Objective v. – Strongly Support</p> <p>2.Public benefit contributions may be used to fund the following Infrastructure and community facilities. Please rank the list below In order from highest priority (1) to lowest priority (6),</p> <p>1. upgrades to Public open space</p> <p>2. Transport infrastructure</p> <p>3. Placemaking initiatives</p> <p>4. community facilities</p> <p>5.Streetscape and public realm upgrade</p> <p>6 Street trees and landscaping</p> <p>3.Further to question 2 above, what other Infrastructure and/or community facilities do you think should be funded using public benefit contribution?</p> <ul style="list-style-type: none"> • Expansion of Ferry pier • More ferry services • Faster ferries • More ferry destinations <p>4.To what extent do you support the requirements for approval of additional development In Schedule 9B of proposed Amendment No. 61? - Neutral</p>	<p>the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p><u>Bicycle and Car Parking</u></p> <p>1.To what extent do you support the objectives for bicycle parking and end of trip facilities in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. – Strongly Support</p> <p>Objective iv. – Strongly Support</p> <p>2.To what extent do you support the objectives for vehicle parking and access in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Support</p> <p>Objective iii. – Support</p> <p>Objective iv. – Strongly Support</p> <p>3. To what extent do you support the requirements for bicycle parking in the draft ACP.- Do not support</p>	Comments Noted	

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				<p>4. To what extent do you support the requirements for vehicular parking in the draft ACP.- neutral</p> <p>5.Do you have any general comments about bicycle and car parking in the draft ACP?</p> <p>To encourage the use of the ferry and facilitate transport-oriented developments, there should be less onerous minimum parking requirements.</p>		
				<p><u>Movement and Access</u></p> <p>1. To what extent do you support the objectives for the local road network In the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. – Strongly Support</p> <p>Objective iv. – Strongly Support</p> <p>2. To what extent do you support the objectives for public transport in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. – Strongly Do Not Support</p> <p>3. To what extent do you support the objectives for pedestrian and cyclist movement In the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>Objective iii. –Support</p> <p>Objective iv. – Strongly Support</p> <p>Do you have any general comments about the objectives for movement and access In the draft ACP?</p> <p>The reason we do not support objective 2(iii) is because too much emphasis has been placed on a potential railway station that remains uncommitted and unfunded. More emphasis needs to be on the Mends St Ferry Terminal - because this is a quality asset opposite Elizabeth Quay / CBD and serves both public transportation and tourism needs.</p> <p>Objective 2(i) should be amended to read:</p> <p>"To establish the ACP as a transit-oriented activity centre supported by multi-modal transit services and infrastructure, <i>including the existing ferry terminal</i> ."</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	

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				<p><u>Public Realm</u></p> <p>1 To what extent do you support the objectives for public open space in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Strongly Support</p> <p>2. To what extent do you support the objectives for public streets in the draft ACP?</p> <p>Objective i. – Neutral</p> <p>Objective ii. – Do not support</p> <p>Objective iii. –Support</p> <p>3. To what extent do you support the objectives for privately owned public open space in the draft ACP?</p> <p>Objective i. – Strongly Support</p> <p>Objective ii. – Support</p> <p>Objective iii. –Strongly Support</p>	Comments Noted	
77	7 August 2019	Letter	Neither support or non support	<p>Main Roads has reviewed the correspondence received on 17 June 2019 and met with the City on 31st July 2019 to discuss the above proposal. The following comments are provided regarding the above Activity Centre Plan:</p> <p>Main Roads key concern is the SPACP impact upon Kwinana Freeway.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	-
				<p>It is understood the City has undertaken a mesoscopic model for the wider area, therefore no revised modelling was undertaken for the subject SPACP. Main Roads has not reviewed the mesoscopic modelling in association with the SPACP.</p> <p>It is recommended, the modelling be provided for Main Roads comment as part of a review process. This review will allow Main Roads as the road authority to determine if there will be any impact to the state road network from the SPACP area.</p>	Comment noted. Further discussions will be undertaken with MRWA as requested.	
				<p>The City's report has identified that the Freeway on ramp and intersection at Labouchere and Mill Point Road is at capacity.</p>	Comment noted	
				<p>The City's transport assessment is reliant upon alternative modes of transport. Further discussion is required on how the change in mode can be achieved. It is recommended in terms of car parking a maximum rate be utilised to encourage reduced reliance upon the use of private vehicles</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. Further discussions are recommended to be undertaken with MRWA as requested.</p>	

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				It is recommended Council considers a maximum rate of 1 car parking space per residential unit and investigates a reduced maximum car parking rate for Commercial land uses. The City is recommended to undertake survey and analysis of other inner city locations (comparable to the SPACP area) in other states to devise suitable car parking rate for this SPACP.		
				The SPCA is well connected to bicycle network. There is opportunity to further encourage bicycle use by providing bicycle racks and end of trip facilities within commercial and residential developments. This will assist in achieving the desired mode shift. It is recommended the City investigate a higher rate of onsite provision for bicycle racks per dwelling. Currently the following rates are recommended. a) 1 bicycle bay per 3 dwelling is recommended per dwelling and b) 1 bicycle bay per 200m2 of commercial Gross Floor Area .	Comment noted. Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				The Flyt South Perth Activity Centre Plan - Movement Network Plan refers to a bike bays in Table 5 Schedule 9A Parking Controls. Typically, bike racks are commonly used to calculate bicycle parking requirements when assessing development applications. Clarification is required of what a bike bay comprises of. Is this a designated area? How many bikes can be accommodated in a bike bay? Is a bike bay a bike rack? This terminology should be defined within the document.	A bike bay refers to a space/rack for a bike similarly to a car bay being a space for a car. One bike bay is space for one bike. The ordinary meaning of 'bay' is consistent within all State Government planning policies that refer to same.	
				The City is advised local traffic treatments will require further approval from Main Roads under the Road Traffic Code 2000. Main Roads Network Operations have advised they are unable to provide in principle for new signals as per current policy.	Comment noted	
				Any future noise sensitive development adjacent to Kwinana Freeway must implement measures to ameliorate the impact of transport noise. All noise sensitive development must comply with WAPC State Planning Policy 5.4 "Road and Rail Transport Noise and Freight Considerations in Land Use Planning".	Development Requirement 4.3.3.3 in the ACP requires development affected by noise from the rail line or Kwinana Freeway to be designed with due regard to the requirements of State Planning Policy 5.4 Road and Rail Transport Noise and Freight Considerations in Land Use Planning. The suggestion that the developments comply with the SPP 5.4 can be accommodated by placing a standard condition on the development approval by the approving authority.	
78	5 July 2019	Letter	Neither support nor not support	The Department acknowledges that the City of South Perth (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. It is noted that the City has adopted a locally based forecast for population and dwelling growth, which is in line with the target in Perth and Peel @3.5million.	Comment Noted. City is recommended to continue to liaise with the Department of Education as requested.	-

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				<p>The Department advises that it is currently undertaking a separate review of the Perth and Peel @3.5million which includes the Central Sub-Region. The review is intended 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. This may have implication on the draft LPS and SPAC.</p> <p>Similarly, in this instance, the Department has relied on multiple information sources such as Perth and Peel @3.5million and the City's data to ascertain the population and dwelling growth for the City. Upon completion of the review, the Department will collaborate with the City to address any matters relating to public schools that may arise from the review.</p>		
79	22 July 2019	Email	Not support	<p>Concerned about the increased traffic problems which will occur if a much higher density is allowed in this area. There is insufficient road access to accommodate the extra vehicles.</p> <p>The water table on the Mill Point Peninsula is very high and I am most concerned that any further dewatering of the area will have a great effect on the water table. I know of residents in the area who have lost the water in their bores. What will happen to the trees in the zoo if any further dewatering is carried out?</p> <p>There is no need for the Peninsula area to be turned into another CBD area. Do we really know if these extremely tall buildings are necessary or are they a dream for developers?</p> <p>If these buildings are allowed there can be no turning back and the area will be forever altered.</p> <p>Remainder of submission is as per the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p> <p>As per Submission 5 Response</p>	<p>ACP – 7, 16, 17, 18, 19, 22, 23</p> <p>A61 – 2, 7, 8, 11 – 17, 20-28</p>
80	22 July 2019	Email	Not support	<p>I urge the council to oppose high density CBD type development. Such developments will lack the essential infrastructure causing significant problems. The South Perth area particularly at the peninsula needs to retain its unique character and not be destroyed by development.</p>	<p>Comment Noted</p>	-
81	22 July 2019	Email	Neither support nor not support	<p>The area currently has a unique village feel to compliment the Perth Zoo and this needs to be preserved.</p> <p>Setbacks and green spaces must be part of the overall plan for the new buildings and assuring all the current trees are preserved.</p> <p>Set height limits also need to be established so that orderly development can be maintained in the area.</p>	<p>A number of these suggestions are already included in the draft ACP and proposed Amendment No. 61, whilst others appear to be comments only.</p> <p>Comments Noted.</p>	-

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				<p>Buildings should be architecturally special - the new build on the corner of Mends and the Esplanade is a good example - Aurelia is not.</p> <p>Traffic is already a problem. The density proposed needs to be further considered and reduced.</p> <p>Podiums in this precinct if no alternative should be limited to two storeys. The roads are narrow particularly in the Peninsula and streets off Labouchere Road and we need to maintain a feeling of space.</p> <p>Developers should contribute to a fund to enhance bold artworks around the foreshore and in the community rather than having to have some artwork of sorts on their buildings. This is creating random pieces painted on and hanging off buildings and insignificant little bits of twisted metal plonked in the front. Who will maintain these painted walls and so on in the future - an example is the dish thing on the corner near Cabbage Restaurant - it seems no one is looking after that.</p> <p>The civic heart should be the highest point (20 storeys) and be offering retail and office space as well as apartments.</p> <p>Retail is slow now but if planning for the future it needs to be considered in the overall plan.</p> <p>A large activity playground for children 6 - 12 years would be welcome somewhere and bring more families. The majority of the little playgrounds in the area are for younger children.</p> <p>This opportunity to plan for the future shouldn't be wasted on short term gain from developers seeing an opportunity - we don't need to sell ourselves short, we should only accept excellence and setbacks and gardens should be part of the plan.</p> <p>We live in a special and unique part of the country here and the character of the area needs to be maintained with careful consideration given all aspects of its future growth.</p>		
82	22 July 2019	Email	Not support	<p>I strongly object to the recommendation to approve a proposal to increase building heights on the South Perth foreshore to 37.5 metres from Fraser Lane to Mends Street.</p> <p>The height limit should be 4 or 5 stories and the street setback 12 metres for all lots from the North / West corner of Harper Terrace to the Narrows Bridge.</p> <p>To increase the height and/or setback of any lot in that beautiful waterfront stretch of property can only harm the aesthetics of the area.</p> <p>I am also concerned that the proposal will cause an extremely large reduction in the value of apartments in the Reva building in Harper Terrace.</p>	As per Submission 1 Response	ACP 11 & 12

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83	22 July 2019	Email	Not support	Submission based on the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
84	22 July 2019	Email		<p>The draft Activity Centre Plan and the Place and Design Report have some good principles.</p> <p>However, JDAP and the City will assess designs against the requirements in Amendment 61. This document needs to be watertight with strong requirements and statements that ensure the objectives are met. As it stands many requirements are weak and many things have been overlooked.</p> <p>Remainder of submission is as per the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response</p>	As per Submission 5 response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
85	22 July 2019	Email	Neither support nor not support	Submission is the same as Submission 81	See Submission 81 response	-
86	15 May 2019	Feedback Form & Email	Support	<p><u>Feedback form</u></p> <p>The 17.5 metre Tier 1 building height limit 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) and provide incentive to rejuvenate the older buildings on the street with low quality architecture and aesthetic.</p> <p>An extra three levels isn't too much and will provide the economic incentive to create new buildings and better architecture along the foreshore.</p>	<p>Building height limits for the 'low' height type area aim to preserve low building heights on South Perth Esplanade to provide a human scale interface to the foreshore and an appropriate transition to the higher buildings along Mill Point Road that have been identified as such to follow the principle of tiering.</p> <p>It is not recommended to increase the building height limit for Tier 1 'Additional Building Height' in the 'low' height type from the advertised 17.5m.</p>	A61 - 11
				<p><u>Email submission</u></p> <p>In the context of transforming South Perth into a thriving and dynamic commercial and residential precinct, I agree with lifting and increasing the height limits that have been in place on the peninsula since the middle of last century, including a higher limit than currently proposed in Amendment No. 61 for the South Perth Esplanade.</p> <p>I have lived in large vibrant cities and there's nothing wrong with very high density living in areas closer to the city and in fact it's the higher density areas that have the diversity and dynamism that is lacking in the lower density areas.</p> <p>In Sydney, New York and London more people want to live closer to the amenities and infrastructures that exist and have a hubbub of</p>	<p>Building height limits have been set in accordance with the objectives set out at section 4.1.1 of Part 1 of the draft ACP. The comment in support of an increase in height along the South Perth Esplanade and Mill Point Road spine is noted.</p> <p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p>	

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				<p>activity. There’s plenty of flat low density land and suburbs in Perth and not enough higher density available.</p> <p>Having lower height limits produces an outcome of fat, squat looking buildings where architecture is not a feature and fewer people have views.</p> <p>I support an increase in height along the South Perth Esplanade and Mill Point Road spine that will encourage more people to live in South Perth, enjoying more of the amenity, increasing demand for a train station to be built and creating a dynamic, active and vibrant precinct.</p> <p>I support increasing heights further than the proposed tier 1 for the South Perth Esplanade to at least the original proposed tier 1 height of 24.3 metres rather than the current proposed tier 1 in Amendment No. 61 of 17.5 metres. This lower limit would only allow a possible one extra building level along the foreshore rather than an extra three extra levels which would be required to regenerate the street from many older 1950s/60s and 70s buildings with no significant architectural or aesthetic significance.</p> <p>A lifting of the height to the originally proposed 24.3 metres will rejuvenate the front street scape facing the Esplanade and benefit all who use the area. It will properly support draft policy P321 for better quality building design and rejuvenated foreshore through a transformation of the front row of the foreshore attraction.</p> <p>My support is for an increase to eight stories of height all along the South Perth Esplanade and an increase up to around sixteen stories along Mill Point Road, which effectively doubles the existing limits.</p> <p>It needs to be a greater increase than the proposed one extra level of building height along the South Perth Esplanade as outlined in Amendment No. 61, which is part of the showpiece of the foreshore, if you want to encourage and incentivise developers and owners to regenerate the current older, tired looking buildings that are currently filling the space.</p>	<p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area.</p> <p>Developments that exceed the Tier 1 height/plot ratio limit must be of exemplary design quality, which is defined in the draft ACP as “being of a standard that provides a high benchmark for design, innovation, and sustainability and is visually striking and memorable in the context of the locality”. In order to achieve this standard the applicant must undertake a competitive design process between a minimum of three suitably qualified architects that is independently assessed in accordance with the City’s South Perth Activity Centre Competitive Design Policy (P321).These requirements reflect the scale and significance of development above the Tier 1 limits.</p> <p>Building height limits for properties fronting Mill Point Road aim to facilitate taller buildings with significant setbacks and space between buildings. This is aligned with the submission and it is not recommended to increase building height limits further.</p>	
				<p><u>In summary -</u></p> <ol style="list-style-type: none"> 1. Increase height proposed for all of South Perth Esplanade to 24.3 metres (not proposed Amendment No 61 at 17.5 metres) to provide enough incentive to rejuvenate many older style buildings into more significant quality designs to support Policy P321. 2. Increasing the height to the currently proposed 17.5 metres will not be enough incentive to achieve the goals of P321 and revitalise the foreshore. 3. Allow taller thinner buildings along the Mill Point Road peninsula to attract better quality developments than the current fat, squat looking buildings. 	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p>	

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				Someone in government needs to take the lead on this initiative with the vision that will deliver the proposed objectives of transforming South Perth into a vital hub of commercial and residential living for many more to enjoy living and working in a vibrant community close to the city.	Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.	
87	22 July 2019	Email		Concerns and objections to the proposed new building heights for the foreshore from Fraser Lane to Mends Street, particularly while the remainder of the Esplanade has a scaling back of heights from the Narrows Bridge to Fraser Lane.	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 – 11, 15
				I am of the understanding that for the area between Fraser Street and Mends Street, the setback is proposed to change from the current 12 meters to 3 meters allowing a larger building area per block.	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p> <p>Some minor changes are recommended to street setback requirements to address concerns raised in submissions relating to specific locations.</p>	
				<p>The proposal defies logic in planning with reference to traffic control, aesthetics for this small area in years to come, and the density of high rise dwellings.</p> <p>The area is serviced by two small roads, Mends Street and Harper Terrace used by residents to the buildings, commercial users such as the Good Grocer, restaurants and specialty shops, families and tourists hoping to enjoy the location and ambience that the foreshore has to offer. With the addition of even more high rises and increased density to this small area, it's obvious the roads will become even more congested and unsafe.</p>	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				The aesthetics of the area must be considered. Should the proposed changes go ahead, the future holds a huge number of high rise developments taking place in a small area, encroaching upon one	Comment Noted	

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				<p>another, as all developers try and maximise the use of the land in order to increase the profitability of their developments. It's going to be an ugly, eyesore high rise concrete jungle.</p> <p>Also distressing that Council is able to approve height concession that allows developers extra height in buildings for the exchange of building or developing a community benefit to the area. So in actual fact, it seems the rules governing height and other building aspects can be changed and approved by the Council upon negotiations with the developer. There is, therefore, no security for the owners purchasing properties such as apartments in the area, as property values can diminish or be destroyed by a decision which makes another property developer extra profitable.</p>		
				<p>I believe the Council should be concerned with preserving the foreshore area from overdevelopment. This will only be achieved by maintaining the building heights at the lower level the entire length of the foreshore and retaining the current 12-meter setback the length of the Esplanade. The Public Open Space along the Foreshore and Esplanade area is used and enjoyed by many Australians living in and outside the area and aesthetically is pleasing as there is limited high rise development at this time.</p> <p>The priority for the Mends Street/ Harper Road area should be changed from growing the council rates base by increasing dwelling density, and, allowing property developers a free hand to increase the profitability of their developments: to, more emphasis placed on preserving the lifestyle value and the aesthetic appearance of this most beautiful and pleasant neighbourhood.</p> <p>It would be a disgrace to see a concrete jungle of highrise in the near future.</p>	Comments noted	
88	22 July 2019	Email	Not support	<p>I live in Aurelia, I know and accept there will be high rise next to our building on the adjacent block and Civic Heart over the road. I am also aware that at some time the Lumiere site will develop. I note on both sides of Mill Point Road going down to the Old Mill there are many old buildings and sites that would be provide an opportunity for high rise or medium developments. The same applies across in Richardson and up in Hillside.</p> <p>I do not see shadowing of the Zoo as a major problem if proper built form is adopted as it is already very shady from the trees and the sun will stimulate growth in the middle of the day. In addition buildings if properly designed can overcome much of this. The main issue that has to be watched is that reflection does not cause problems when the sun at an angle reflects down on certain parts of the Zoo or other properties. The glare can be enormous.</p>	Comments noted. Counter view to submission 1.	ACP – 11, 12, 16, 18, 19, 22, 23 A61 - 11
				Population projections are skewed towards all developers and financiers being successful with their plans and that will not	A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft	

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				<p>happen. Too much density in the area will scare people away as it means it will drop the value of their residential units or investment units. Buyers want appreciation not depreciation and long term investments.</p> <p>The amenity cannot be ruined because of just planning ideas covering density as this is not always good planning.</p> <p>My international friends love Perth, Kings Park and South Perth for its un-cluttered clean lines feeling. This could be destroyed if too much development along the foreshore facing the City.</p>	<p>ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				The environmental issues and dewatering issues with such a low water table are also factors to minimize developments along the peninsula. Saline water is a huge issue!	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				Traffic flow will get worse as Australians and overseas travelers still hire cars and older people still visit their children who live outside of the city region. South Perth is going to be cluttered with traffic jams in the future. More Ubers/taxis and Food delivery suppliers will increase traffic congestion. There is all the Learning Centre in Aurelia for 80 children.	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>There is a strong focus in the draft ACP on reducing car use in the area and increasing the use of public transport, cycling and walking.</p>	
				<p>No government of any persuasion will support a train station I believe for over 20 years. This will mean more cars and buses.</p> <p>The ferry transport hub will not cater for huge numbers as many find it too slow. This is a reason not to cater for too much density.</p>	Comment noted	
				Too many block buildings on a front foreshore such as close to Mends Street creates an inevitable longer term unwelcoming view. You wouldn’t want another Echelon!	Comment noted	

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				<p>Strong Suggestion is to:</p> <p>Allow for 17.5m max height limit with 10m to 12m set back from front fence line be extended from Fraser Lane to Mends Street (this supports better scaling down to river and better designed and better quality houses/units). It is also equitable.</p> <p>Alternative was allow 21m max height limit from Harper Tce to Mends Street with 10 to 12m set back from front fence border.</p> <p>Some of the areas on east side of peninsula could also be selectively raised to 21m. E.g 17.5 and 21m and then 17.5 again to create some scaling probably closer to freeway off ramp and subject to not blocking existing quality units.</p> <p>That Hillside because of its position have some more dark blue areas so height increases.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>It is not recommended to decrease the building height limit in this location. However, it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				That some areas outside Activity Centre boundaries such as along Labouchere Road and opposite the SP Golf Course have some restricted height limits	Comment noted – This location is not considered as part of the draft ACP and there is no scope to extend the boundaries of the draft ACP at this stage.	
				Set in place the above with a review in 10 years so to at least tweak some areas after taking into consideration economic and population trends at the time.	Ongoing monitoring of the documents will be undertaken to assess emerging concerns. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.	

89	22 July 2019	Email	Not support	<p>There has been a significant shift in the last ten years towards medium to high density living. This is a much needed development in order to reduce urban sprawl and increase the efficiency of our infrastructure and transport networks.</p> <p>However increased density can bring its own problems which can impact on the amenity of an area. Cities are for people and it would be desirable to have development bringing positive effects to the greatest number of residents, workers and visitors.</p> <p>We can see the immense amount of work that has gone into the planning of the above proposal and agree that having a “robust planning framework” is crucial in charting a course for the future. The Activity Centre Plan objectives on page 55 are admirable, especially the one which makes reference to urban development responding to its context.</p> <p>However, there is concern about the height of buildings from Fraser Lane to Mends Street. With the height levels being 37.5 metres (13 storeys), new buildings will be taller than the existing buildings behind them. This would be a clear disadvantage to people living or staying in the pre-existing Reva, Aurelia and Quest apartment buildings.</p> <p>The building height should be lower close to the river, gradually increasing as you move further away from it:</p> <ul style="list-style-type: none"> to preserve the expansive feel of the foreshore, reduce the impact of the built form close to the public realm and to help create an inviting feel for ferry passengers as they enter the Connect South area. This will mitigate the negative effects of larger buildings on aspects such as light, cooling breezes and wind tunnels. <p>The reasons for our concern are that:</p> <p>The ACP will create financial loss for some people who have already purchased and so create uncertainty in the investment strategies.</p> <p>It will create ill feeling in the community, with the perception that new rules are being planned to allow changes which unnecessarily disadvantage them;</p> <p>Overshadowing necessarily means that pre-existing buildings will receive less of the warming effects of the northern sun; this leads to increased use of air conditioning which does not align with emerging sustainability principles.</p> <p>Prefer that there is:</p> <ul style="list-style-type: none"> consistency in the building heights along The Esplanade, “a well-designed interface between the public realm and buildings” as stated in the ACP Summary Sheet 9 attention paid to residents and ratepayers who are already living and working and contributing to the vibrancy of the area, attention paid to the unique character and attributes of the South Perth foreshore, which means it should not be treated in the same way as other infill areas, which don’t have such 	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The existing Town Planning Scheme No. 6 has a building height limit of 25 metres in this area, which is measured to the finished floor level of the upper-most storey. This allows for a building of up to approximately 30 metres height in total. Properties on South Perth Esplanade to the east of Harper Terrace are able to have additional height above this building height limit, with no upper limit on building height. Tower setbacks are required to be 4 metres or less and there are no tower floorplate area limits.</p> <p>In the location subject to this submission the base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>Whilst it is recognised that the existing development 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 (and noting that such a right is also subject to potentially unexpected impacts such as natural disaster response etc).</p> <p>Where no such restrictive covenant or other legally binding agreement exists, a buyer should assume that the planning frameworks may be subject to change and should be prepared for future planning review such as large-scale precinct planning. The detailed structure planning of the South Perth area has been foreshadowed for some time.</p> <p>It is not recommended to decrease the building height limit in this location. However it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	ACP – 11 & 12
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				<p>wonderful assets as the river, a long and proud history associated with the Zoological Gardens, and the amazing public amenity associated with Sir James Mitchell Park – none of which should be compromised by development that is not in keeping with the ambience of the area.</p> <p>In summary:</p> <p>The most outstanding feature of the area being considered by the South Perth Activity Centre Plan is without doubt, the river. Surely it is preferable to have the greatest number of people able to enjoy a connection to it. With greater height at the river this means unparalleled views for a few and possibly a concrete canyon feel for many.</p> <p>The people who live in an area are the most important aspect here. If the decisions made adversely affect them then what is the point in those decisions? All the pictures on City of South Perth’s website show open spaces, picturesque views and pretty tree lined streets. The extraordinarily high rate of people who both live and work in South Perth (almost 30%) illustrates the liveability of the area. To change the factors which probably make this so, the open space, a good balance between amenity and a pleasant environment could jeopardise the very things that have led to the desirability of living in this area.</p> <p>For reasons of equity, sustainability, resident and public amenity, and consistency in Town Planning regulations we hope that the building height all along the foreshore will be limited to 17.5 metres</p>		
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No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
90	22 July 2019	Email	Not support	<p>I acquired my Apartment property 4 years ago off the plan. My apartment is situated on the 10th Level of Aurelia and I paid a substantial premium price as against level 9 to ensure I was above the “Clear View Line” of the maximum height limits for life. As is now evident after the building of the Reva development in front on me the maximum height is not 25m but much more once you add a gazebo and a 2m lift service box on its roof thus significantly reducing the promised clear view line, more like 31m. The same applies to the new building on the corner on Mends St where their “rooftop services” also have increased the overall building heights by approximately 8m.</p> <p>I think it is very important for the Council to have an entire tiered Height approach down towards the River Foreshore.</p> <p>My objection is that the proposed maximum heights along the South Perth Foreshore should be uniform to a limit of 17.5m with a 12m setback from the road to provide property certainty, consistency and equality to all current and future South Perth ratepayers.</p> <p>The Council has targeted a 37.5m max height between Mends Street and Fraser Lane with a 3m setback which in all ratepayers view is just outrageous especially where there are at least 3 future development blocks in this precinct which I believe are now negatively influencing the Councils proper decision making processes. These sites include Peninsula Apartments, Ferry Close Apartments and the corner blocks (East & West) of Harper Terrace and the Esplanade.</p> <p>Traffic management is already a major problem in peak periods without the even higher proposed population density, it is not uncommon at 8am to sit for 4 sets of lights to turn right from Mill Point Road onto the Freeway entrance.</p> <p>Lack of parking has also become a growing major issue in the immediate area and will continue to escalate if the larger developments continue to be approved on the Foreshore Precinct.</p> <p>In summary:</p> <ol style="list-style-type: none"> 1. Apply “uniform maximum heights” along the entire South Perth Peninsula 2. Apply Equitable Equity for all present and future ratepayers which provides greater certainty to all parties in their property dealings. 3. Make the Maximum Height the “Maximum Height” with all building services included within that figure, again providing greater certainty. 4. A stronger approach by Council to address current and future Traffic and Parking Issues. 	As per Submission 1 response	ACP 11 & 12

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91	22 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
92	22 July 2019	Email	Not support	<p>Strongly disagree with a height increase from 25m to 37.5m from Fraser Lane to Mends Street, but scaled back elsewhere on the Foreshore to 17.5m.</p> <p>This decision means that the Council has NOT treated ALL residents/owners of residences overlooking the Swan River/City skyline EQUITABLY when in a "Special Meeting" on 6/3/2019, the City of South Perth Councillors unanimously approved a scaling back of heights from 24.3m to 17.5m from the Narrows Bridge to Fraser Lane and from 37.5m to 17.5m from East of Mends Street BUT UNFAIRLY ignored the negative impact of higher levels from Fraser Lane to Mends Street, where 25m is current and 37.5 m is being proposed.</p> <p>The proposed height increase to an unprecedented and unnecessary 37.5m has killed whatever interest there is in investing further in the South Perth Foreshore.</p> <p>The entire South Perth Esplanade/Foreshore should be treated equally and maintain a height of 17.5m throughout.</p>	As per Submission 1 Response	ACP 11 & 12
93	22 July 2019	Email	Neither support nor not support	Strong support for Appendix 9B Map 2 regarding Building Height	Comments noted.	ACP – 4, 5
				Strong support for Tiering as a plan within the above map	Comments noted.	
				Strongly disagree with the Plot Ratio formula including residential car bays.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.	
				<p>I realise the ACP Plan is planning for the City's long term future but in this current economic climate the formula for Residential and Non Residential Mix being 1.0 or 30% whichever is the lesser, is currently unworkable.</p> <p>In order to encourage development asap after everything is confirmed, which will then lead to an increase the city's income, I suggest a temporary reduction option in the Non-Residential component to be reviewed in 5 years.</p>	<p>Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre.</p> <p>Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. The development requirements only apply in the Mends and Richardson Character areas and combine with preferred uses at ground level to support the development of these areas with a mix of land uses.</p> <p>Notwithstanding, there may be practical reasons why development could be constrained by these requirements, based on demand for commercial floor space. This may either prevent development or result in vacant ground floor frontages.</p> <p>It is recommended to modify development requirement 3.1.4 of the ACP to allow for development to provide commercial grade minimum floor to ceiling heights for the</p>	

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					percentage of the development that would otherwise be required to be commercial, so that this area can be converted to commercial at a later date. Development requirement 3.1.4 does not prevent development of sites with 100 percent non-residential floor space.	
				Tier 1 and 2 Public Benefit Contributions, please use these to assist the State Government fund the South Perth Train Station, in order to ease the traffic on the Freeway on and off ramp	The City of South Perth will establish a special fund for public benefit contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP. Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
94	22 July 2019	Email	Neither support nor not support	I commend the City of South Perth for the work to date on the ACP.	Comment noted	ACP 11 & 12
				Provision 4 Character Areas – <u>2.a.xii</u> notes the “South Perth Esplanade should be upgraded.....” I believe this clause should reinforce the fact that South Perth Esplanade should not be a road to service through traffic and deterrents should be considered such as speed bumps, 25km speed limit etc.	Comment noted Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	A61 – 11
				<u>2.b.v</u> view corridors should be stipulated as an <u>objective</u> , not only “.....to allow mid-block views.”	It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties to provide greater separation between buildings, wider view corridors and more ventilation.	
				<u>2.c.vi</u> the building heights map 2 does not complement your objective as the northern end of Mill Point is set out at Tier 1 – 57.5m thus allowing tall buildings, providing they meet criteria to be the same height and not stepped down.	Some minor changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.	
				<u>2.c.ix</u> as per 2.a.xii deterrents should be considered to ensure South Perth Esplanade is not a through traffic road and should only be for City of South Perth residents and visitors who wish to use/enjoy the area.	Comment noted	
				<u>2.c.x</u> “publicly accessible private open space” is a good objective however there is no mention of <u>serviced by adequate public parking</u> .	Comment noted.	
				<u>2.d.ix</u> “the South Perth Esplanade” there is no South Perth Esplanade in Hillside? <u>Element 1: Zoning 1.5</u> Hillside again there is no South Perth Esplanade at Hillside.	Comment noted. Some minor changes to character area boundaries are recommended.	

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				<p><u>Element 2: Building Heights – Table 2 and Map 2</u> require more changes to achieve a more balanced and acceptable plan for all City of South Perth residents yet still achieving all objectives. There is no issue with building heights generally however where they apply is of concern given that in many cases new buildings can be in excess of 100% taller than existing buildings. In some cases plot ratio and height as depicted in Map 2 may be increased by 500% under certain conditions. I consider this to be excessive and unnecessary.</p> <p>1. I have attached in this submission my version of Table 2 and Map 2 (see Full Submission) noting the following in summary: Tier 2 should <u>not be available to medium height type</u> as this would raise the height in these areas in excess of 500% (south shore). Tier 1 is adequate.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>2. All plot ratios should be based on a more sensible percentage of 50-100% increase but <u>no more than 100%</u>.</p>	Comment noted	
				<p>3. Tier 2 should only apply to areas shown in my amended Map 2. You will note the following: South Shore Shopping Centre to remain as medium i.e. maximum 37.5m which is 300% above existing.</p>	There is opportunity for landmark development on the subject site that provide a gateway focus from the ferry and Elizabeth Quay.	
				<p>Removal of tier 2 to a significant area of Hillside as it is currently geographically already significantly higher than other areas. Allowing this area to rise in excess of 40 stories would place them “in the clouds”. My amended Tier 2 recommendation shows a more balanced and symmetrical high rise.</p>	Some minor changes are recommended to heights and tiering.	
				<p>All medium-high zoning on Mill Point Road (both sides) from Frasers Lane north should be <u>medium</u> height thus allowing them to 37.5m which is 50% above current. Rather than what is proposed which is potentially 240% increase in height.</p>	Some minor changes are recommended to heights and tiering.	
				<p>Several inside lots between Ferry and Frasers Lane changed to medium and <u>not</u> medium-high.</p>	Some minor changes are recommended to heights and tiering.	

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95	22 July 2019	Email	Not support	<p><i>NB: These comments are referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>Horried at the current and proposed high rise development of the peninsula. Whilst appreciating the development of restaurants and shops in the Mends St area, there is a want to preserve the “character” of the residential parts of the peninsula, which would mean only low rise development and maintaining plenty of green space.</p> <p><u>Building Size and Height:</u></p> <p>Height limits should be restricted to a much greater extent than currently planned. Ideally heights should be restricted to ‘low’ height on the edges of the peninsula and low/medium height in the centre. The exception would be Mends St, and along Labouchere Rd from Judd St to Hardy St, which should be limited to medium height development. Particularly concerned about high rise development around the zoo that may cause too much shadowing of the zoo grounds.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 - 11
				Podiums / Car Parks: In general terms these should not be permitted to exceed the footprint of the building in residential areas. Podiums should not permitted if there is a sacrifice of green space. If podiums are permitted, it should be a requirement that green space is maintained on top of them.	Comment noted	
				Setbacks: Should be at least 6 m for anything higher than ‘low’ height in residential areas.	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				Developer Contributions: City of South Perth should compel developer contributions to local amenities including contributing to maintenance of public open space and moderating traffic congestion.	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area,</p>	

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					<p>and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>Design Quality: There should be standards for design quality. Lack of quality can result over a period of years in significant diminishment of amenity and desirability of a neighborhood.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p>	
96	22 July 2019	Email	Support	<p>Supportive of ACP providing a sensible Height and Plot Ratio Map that does not have the words unlimited height in it.</p> <p>Now that inflammatory aspect has gone, the changes will create views for more residents, as well as with the introduction of building height tiering which will create an impressive vista of South Perth from Mounts Bay Road, Kings Park and the City Perth</p> <p>I think the changes enacted by Amendment 61 should be written in simple English for the benefit of clarity and the regulations introduced should be consistent throughout the whole Activity Centre.</p> <p>Although the Height Map is what most people will focus their attention on, there are many more aspects within the ACP that I can see will be of concerns to landowners, such as the outcome for smaller blocks, mid-block links and pocket parks although personally I think small parks are a good idea.</p> <p>I think the ACP and Amendment 61 are not developer driven and are rate payer and COSP friendly.</p>	Comment noted	-
97	22 June 2019	Email	Neither support nor not support	<p>I am happy that the City of South Perth is proactively planning for its future.</p> <p>I am providing feedback with perspectives gained from living in small communities and a small selection of the largest and most vibrant cities in the world over the last 20 years. In that time I have lived in Sydney, Chicago, San Francisco, Sonoma, Seattle and New York (including Scarsdale and Tarrytown), and spent extended periods in London, Whistler, Paris, Florence and Barcelona. The most desirable and sought-after residential areas have a higher than</p>	Comments Noted	A61 - 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				average amount of green space, with mixed residential and commerce developments that have a preponderance of medium density residential dwellings (low and low/medium height). Very few, if any, of the most desirable areas have many buildings above low or low/medium height, with the clear exceptions being Chicago and New York. Even in those cities the happiest median is in		
				Remainder of submission as per Submission 95	As per submission 95	
98	22 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
99	22 July 2019	Email	Not support	<p>We have seen a copy of submission number 60 and agree with all that has been said in that submission. The negative impact of overshadowing from a development next door with no side setback. No sunshine all day long on the eastern side of our building – with the inevitable increase to lighting and heating costs during the winter months.</p> <p>Not supportive of unacceptable building height proposals that will cause significant overshadowing, ugly podiums that without setbacks will detrimentally impact neighbours and multi-storied apartment buildings that will add to increasing traffic chaos. The once pleasant livability of South Perth will be destroyed.</p>	As per submission 60 Response	ACP – 7, 8, 9, 10, 11, 12, 17 A61 – 13, 14, 15
100	22 July 2019	Email		<p>Having read the SOUTH PERTH ACTIVITY CENTRE PLAN (DRAFT FOR CONSULTATION) // FEBRUARY 2019 I found it hard to follow all the details but wish to comment on particular points.</p> <p>In particular I wish to protest about the proposed height changes for buildings along the Esplanade foreshore. Also I object to the proposal to grant any additional Height or Plot Ratios based on some public benefit contribution.</p> <p>As background, I bought an apartment off the plan at which time I was assured by the estate agent for the property that views would be preserved from the tenth floor up. I feel betrayed by that agent and the Council. My advice to anyone thinking of buying off the plan in the future is DONT.</p> <p>Documentation which I have studied on the South Perth Council website includes</p> <p>1) SOUTH PERTH ACTIVITY CENTRE PLAN (DRAFT FOR CONSULTATION) // FEBRUARY 2019</p> <p>This contained statements describing the height of buildings on the Esplanade in terms like:</p>	<p>As per submission 1 Response</p> <p>Other comments noted</p>	ACP 11 & 12 A61 - 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				<p>Page 78: "Built Form Landmark development on key sites, while preserving lower scale development along the South Perth Esplanade to preserve views"</p> <p>Page 103: "Figure 17 Building Height" The Figure 17 appears to show building heights to be "Low" on the Esplanade to the east and west of Harper Terrace as described in 7.3.4 below.</p> <p>Page 115: "7.3.4 Key Issue: Response to Existing Development and Local Character"</p> <p>"South Perth Foreshore: Additional setbacks have been proposed for most properties in South Perth Esplanade, with the exception of the active Mends Street vicinity, to extend the sense of greenness and openness from the South Perth Foreshore Reserve. Outside of the Mends Street vicinity, building heights are generally "Low", to develop a sense of depth in the skyline, as viewed from the Perth CBD."</p> <p>(Appendices 1 and 2 of this document are empty)</p> <p>2) Appendix 1 (dated 27/08/2018) which contained statements "this report may not be relied on by a Third Party" "This scenario testing and modelling is unconstrained meaning it has not taken into consideration existing land supplies, planning and infrastructure capacity." and terms like "aspirational".</p> <p>3) Town Planning Scheme No 6, Amendment No. 61 (Version Two 27/02/2019) regarding Schedule 9B Page 15: "Map 2: Building Height and Plot Ratio Limits" Map 2 shows building heights to be "Medium" on the Esplanade to the east and west of Harper Terrace in contrast to others on the Esplanade which are "Low" except for those adjacent to Mends Street which are Medium. This is a major change from document 1) Figure 17 mentioned above.</p>		
				<p>Page 7: with regard to the objectives of the Mends character area:</p> <p>The Mends character area lists 12 points of which only 3 relate to the Esplanade foreshore. These are viii, ix, and xii. None of these require building heights greater than "Low" as they could be achieved by the provision of the desired soft landscaping, visitor attractions, and waterfront boulevard and park.</p> <p>There appears to be no rational for the proposed increase in building height as proposed in Map 2.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>Page 17: Map 3 Street Setbacks</p> <p>Given the Mends character area objectives viii, ix, and xii above, it seems counter-productive to have "Nil" setbacks between on the</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street</p>	

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				<p>Esplanade between Harper Terrace and Mends Street where visitor amenities may be envisaged.</p> <p>At least a 3 meter setback would seem preferable as is shown to the west of Harper Terrace. This could allow for attractions to spread around the corner from Mends Street along the Esplanade to Harper Terrace.</p>	<p>setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>Page 21: Element 7: Design Quality and Element 8: Approval for Additional Development Potential (Height and Plot Ratio)</p> <p>I am STRONGLY AGAINST the proposal to grant any additional Height or Plot Ratios based on some public benefit contribution. I regard such granting as being the source of much dispute in future. It is likely that the Council is making a rod for its own back.</p> <p>A grant which by its nature benefits the developer is likely to disadvantage some other individuals even though it may benefit a wider group. It is an asymmetric bargain with the power being in the hands of the larger party. The Council itself stands to benefit from such grants by way of increased rates while disadvantaged ratepayers gain no relief.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>A future Council may not be sympathetic to the needs of the ratepayers whom it should serve. Councils do make decisions regarding the foreshore which are rejected as has been seen in recent times.</p> <p>I hope that I have correctly understood the documents provided and that my comments may provide assistance in the decision making process.</p>	<p>Comment noted</p>	
				<p><u>Feedback form</u></p> <p>The population figures for the SPACP seem too high. The Appendix 1 is blank so the reference in Part 2 6.2.1 can't be checked.</p> <p>The height figures for buildings on the foreshore should be the same and not higher on either side of Harper Terrace.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016.</p>	

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					<p>This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
101	21 July 2019	Email	Not support	<p><i>NB: This comment is referenced throughout this summary of submissions for identical or similar submissions.</i></p> <p>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.</p> <p>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.</p> <p>The ACP appears to be about the buildings rather than how ancillary services (eg supermarkets, retail, big box etc). and activated street fronts of restaurants, offices and coffee shops) being provided in the area. The ACP does not appear to have a well-defined guiding strategy on which to align planning and area development decisions.</p> <p>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’.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 - 11
				<p>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</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
				<p>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.</p>	<p>Comment noted</p>	

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				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.	Many opportunities were offered to residents and stakeholders to provide comment. A summary of engagement outcomes is available for review.	
				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.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.	
				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.	Many opportunities were offered to residents and stakeholders to provide comment. A summary of engagement outcomes is available for review.	
				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. 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.	Comment noted	
102	21 July 2019	Email	Not support	This Draft Activity Centre Plan and the supporting Place and Design Report contain some positive principles. However, we are concerned about the following aspects of the plan. 1. Removal of height limits It is essential that height limits remain imposed for all buildings within the proposed area covered by the Activity Plan. Buildings above a height limit have had a negative effect on the amenity of the area and is not in keeping with the height of neighbouring dwellings.	Unlimited heights are not proposed in the draft ACP and proposed Amendment No. 61.	ACP – 16, 18 A61 – 12-15
				2. Inadequate provision for setbacks There is a need for consistency in the provision of setbacks to allow for maintenance and/or planting of trees and for the safety and comfort of pedestrians. Setbacks are essential for providing appropriate buffers and noise insulation between properties.	Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future). Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this	

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				Podiums, which are arguably justified in retail areas, should also be excluded from residential areas.	<p>discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p>	
				<p>3. Lack of consideration of the negative effects of shadowing</p> <p>Perth Zoo is currently subject to shadowing due to an excessively tall building on Labouchere Road. The effects of this are:</p> <ul style="list-style-type: none"> a) negative impact on animals’ biological rhythms b) loss of amenity for visitors c) reduced efficiency of the zoo’s provision of solar energy leading to an unnecessary impost on WA taxpayers. <p>Shadows cast by very high buildings will impinge on the lifestyle of neighbouring low residences in a variety of ways:</p> <ul style="list-style-type: none"> a) inadequate light in houses b) negative impact on domestic solar panels c) increased financial outlay for heating in winter 	<p>Properties immediately adjacent to Perth Zoo on Labouchere Road cannot be taller than approximately 17 storeys (the Pinnacles building is 20 storeys). In addition, the impact of shadow on the Zoo has been taken into consideration and each development will be assessed on its merits.</p> <p>It is reasonable to include specific provisions in Amendment No. 61 that ensure the Zoo is protected from overshadowing.</p> <p>A modification to the ACP is recommended to add an objective and requirement to limit overshadowing of the Zoo.</p>	
				<p>4. Inappropriate population projection estimates</p> <p>It is totally inappropriate to use population forecasts for 2041 as a basis for calculating dwelling and density targets for South Perth in 2020. We should focus on the targets for 2031 which are much more realistic and will avoid an oversupply of apartments and commercial properties which is currently being experienced in the Eastern States.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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</p>	

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					<p>within the established vision, particularly if demand is underestimated at the strategic planning stage.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>5. Irrelevance of a train station to the current Activity Plan.</p> <p>It appears that the construction of a train station in South Perth is being used as an excuse by developers to justify the need for additional high density apartments on the Peninsula. At this stage there are no projected plans nor funding for such a station, and therefore it should be removed from the Activity Plan.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	
				<p>6. Inclusion of Perth Zoo in the formula for calculating the ratio between recreational space and number of dwellings.</p> <p>It is obvious that the Perth Zoo should not be considered as a public recreational space for the purpose of calculating building density. By removing the area occupied by the Zoo from these calculations the ratio between the number of dwellings and public space available for residents is significantly reduced.</p>	<p>The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.</p>	
				<p>7. Flawed modelling of Traffic</p> <p>It is apparent the Flyt vehicle movement report data is out of date and inaccurate. For this reason, it is recommended that a new study be undertaken to include the impact of increased traffic flow and congestion in the area, directly related to apartment building infill. Failure to do this will exacerbate an already difficult situation in relation to commuter traffic.</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p>	
103	18 July 2019	Email & Feedback Form	Neither support nor not support	<p><u>Email submission</u></p> <p>Submission content runs over 100 pages of written text. The submission comments generally on many elements of the plan, however, the submission does not provide any clear objection to a specific element or directly suggest improvements or modifications to the plan.</p>	Comments noted	ACP – 4, 5, 9 A61 – 12-19
				<p><u>Feedback form</u></p> <p>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.</p> <p>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</p>	Comment noted.	

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				<p>(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.</p> <p>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”!)</p>		
				<p>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 neighbours. Parliamentary Counsel draft legislation and regulations but local planning schemes are drafted by relatively unskilled planners.</p> <p>My proposed changes to the proposed tier system will be submitted separately by email.</p>	Comment noted	
				<p>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.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>Minimum tower setbacks and tower floorplate area requirements will combine to determine tower location. Minimum setback requirements are important to ensure sufficient separation between towers.</p>	
				<p>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</p>	<p>Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre.</p> <p>Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. The development requirements only apply in the Mends and Richardson Character areas and combine with preferred uses at ground level to support the development of these areas with a mix of land uses.</p>	

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				maintaining a striking frontage to the project, where architectural confidence is at the forefront." Is that type of combination still possible in the draft ACP and draft A61? If not, it should be.	<p>Notwithstanding, there may be practical reasons why development could be constrained by these requirements, based on demand for commercial floor space. This may either prevent development or result in vacant ground floor frontages.</p> <p>It is recommended to modify development requirement 3.1.4 of the ACP to allow for development to provide commercial grade minimum floor to ceiling heights for the percentage of the development that would otherwise be required to be commercial, so that this area can be converted to commercial at a later date.</p> <p>Development requirement 3.1.4 does not prevent development of sites with 100 percent non-residential floor space.</p>	
				<p>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.</p> <p>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.</p>	Comments noted	
				<p>Affordable Housing, CAT type bus service, Fenced dog exercise areas should be funded by public benefit contributions.</p> <p>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 explanation of how this policy is to be applied is so involved that it seems to be unworkable /impractical.</p> <p>Adopt affordable housing policy similar to that of MRA.</p> <p>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.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>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.</p>	Comment noted	
				<p>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</p>	Comment noted	

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				<p>overdevelopment have been amply demonstrated in Sydney and Melbourne so why go down that path?</p> <p>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.</p>		
				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.	Comment noted	
104	21 July 2019	Email	Not support	<p>Amendment 61 and the draft South Perth Activity Centre Plan proposes a huge increase in population density, far beyond what was requested by the WA Planning Commission or needed to meet its stated objectives. The resultant triple base heights and the huge increase in building heights are TOTALLY UNACCEPTABLE, particularly for the Peninsula.</p> <p>Amendment 61 must be significantly revised to adequately detail what can be built and what cannot be built. There are far too many allowances and far too much discretion allowed.</p> <p>The “consultation” process initiated and led by the City of South Perth has been a complete farce with the community’s input totally ignored in favour of profit focussed building developers.</p> <p>I have no objection to reasonable development in South Perth, but the draft South Perth Activity Centre Plan is an obvious violation of what is reasonable and what was requested by the WA Planning Commission.</p> <p>Councillors must REFUSE to approve the Plan and the Amendment until it is more realistic and indicates that local residents’ objections and opinions have been taken into account.</p>	Comment noted	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
				The proposed increase in South Perth’s population is way beyond the WAPC requirements and should be scaled down to maintain the pleasant development of our suburb.	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. 	

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					<p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>South Perth is not a CBD and must not aim to become a metropolis, or destroy our natural landscape.</p> <p>The only area which could consider unlimited building height should be the Civic Heart. In the meantime, all other buildings should scale down from an assumed height there.</p> <p>Approval of the SPAC Plan would result in a dramatic increase in the number of serviced apartments, which is an obvious and disingenuous attempt to circumvent the intent and objectives of the City Town Planning Scheme No 6 (TPS6) and the statements made by Justice Chaney in his judgement on the 29 storey proposal for 74 Mill Point Road.</p> <p>The northern end of Mill Point Road is probably the prettiest street in all of Perth. But approval of the SPAC Plan will destroy the amenity of the area and disrupt the streetscape with multiple very high rise CBD type buildings, many with minimal setback.</p> <p>Such CBD type building heights are totally inappropriate on the Peninsula.</p>	<p>Unlimited heights are not proposed in the draft ACP and proposed Amendment No. 61.</p> <p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>These documents do not address the obvious infrastructure required to support such a dramatic increase in population and traffic. There is no mention of a developer contribution scheme or similar but funds are essential for services, and should only be provided by the developers.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p>	

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					Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
				<p>The list of shortcomings in these documents is long, but includes:</p> <ul style="list-style-type: none"> • Insufficient Traffic modelling; • 3D modelling of density and allowable building heights, setback, podiums, shadowing, etc are inadequate or omitted altogether; • Inclusion of an imaginary train station is ridiculous; • The zoo is not a recreation space for recreation as a generally accepted sports area or similar, and should be omitted from density calculations; • Groundwater and flooding issues. 	See response to Submission 5	
105	21 July 2019	Email	Not support	I reject the Draft City of South Perth Town Planning Scheme #6 Amendment 61. There should be more planning, green space, solar space and height restrictions in this area.	Comment Noted	-
106	21 July 2019	Email	Not support	<p>Many of the stated objectives are laudable. However there should be some stronger statements and greater certainty contained in this document, to send a clear message to those who propose developments, and those who are in charge of approving or disallowing them.</p> <p>The degree of discretion should be curtailed. There needs to be some certain parameters to the discretion, else the developers will simply seek to whittle all requirements away. An overarching, certain limit (either a minimum - such as set backs; or a maximum - such as building heights) should be included. The benefit of this would be certainty for all parties, and that clarity would lead to less time and expense for all in the planning process.</p> <p>We do not need tall towers to satisfy WAPC targets. The desire for these is purely commercial: and the business case for this is less than brilliant in any case. We do not need (or want) a second CBD on the peninsula.</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016.</p>	A61 – 11, 12-19

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					<p>This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				Increased height development should not extend beyond Ferry St. The peninsula is special, geographically limited, has very special tree canopy that should be protected, and already contains a good level of development. It is over 1km from any train station (even if one were to be built), so it falls outside the maximum walkability range.	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				The zoo should not be included as recreation space in the density calculations. It is not available to residents for recreation in the same way as an oval or open space. Including it overestimates the amount of recreational space available to residents.	The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.	
				We should be aiming for greener buildings. Let us be the example to all of Perth, with high quality, sustainable housing that people actually want to live in long term, to build communities that care for one another.	Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which represents Australian best practice. Buildings seeking additional height are likely to consider higher ratings to meet other design outcomes and demonstrate design excellence.	
107	22 July 2019	Email	Not support	<p>Submission is as per the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response</p> <p>I have no idea why the City of South Perth want to turn the South Perth Peninsula into a 2nd CBD – this has never been included in the WAPC’s plans.</p>	As per Submission 5 response	<p>ACP – 7, 16, 17, 18, 19, 22, 23</p> <p>A61 – 2, 7, 8, 11 – 17, 20-28</p>
108	20 & 22 July 2019	Email & Feedback Form	Not support	<p><u>Email submission</u></p> <p>The greatest health problems faced by residents and ratepayers currently are:</p> <ul style="list-style-type: none"> Air pollution Noise pollution 	<p>Comments noted.</p> <p>Although vehicle noise is not a consideration in the draft ACP, developments in proximity to major roads and freeways must consider SPP 5.4. This can be accommodated by placing a standard condition on the development approval by the approving authority.</p>	ACP - 17

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				<p>Neither of these factors are referred to in the Draft Activity Plan but they are so detrimental to human health.</p> <p>Air pollution from vehicles is a big problem.</p> <p>Noise pollution from vehicles (motor bikes, trucks, etc) is terrible. In other states/countries, vehicles have to undergo regular inspection to ensure they haven't been modified as to noise and emissions. That would go a long way towards improving the noise (to say nothing of the safety) of vehicles.</p>	Other considerations are assessed for impact on adjoining areas for mixed use and other land uses.	
				<p>A growing problem is the outside concerts not just held in South Perth, but also City of Perth and most recently Burswood. There was an African concert held by the City of Perth earlier this year which went for 9 hours without stop. The noise and thumping felt in the chest was dreadful. When I complained to the City of Perth they said it was "within limits" and that the City of South Perth had agreed to it. The reality is, they didn't measure it from South Perth and the council officers have no idea what it is actually like to have it go on for so many hours. The most recent problem concert was the Australia Day concert at Burswood which went for 2 days and could be heard (and felt in the chest) all the way up to the Narrows Bridge.</p> <p>No-one is saying don't have concerts – the thing is to turn the noise and base down. There is no need for the extreme volume and that is very bad for the health of the attendees – let alone the people who chose not to attend. I live next to Sir James Mitchell Park and I find that concerts held there are generally OK. Whilst the problematic concerts seem to be held outside South Perth.</p>	Comment noted.	
				<p>Noise and Air Pollution are very real problems in today's world and should be part of every development/permit consideration.</p> <p>The seaplanes using the Swan River to land and take off pose three health risks:</p> <ul style="list-style-type: none"> • Air pollution • Noise pollution • Human safety <p>The noise of landing and take-off is dreadful – as though there is a jumbo plane landing in your lounge room/bedroom. I have also asked what impact the noise/vibration has on the dolphins and bird life and have been told that the experts don't know.</p> <p>One wonders what the planes are spewing out air pollution wise – both above and below the water; and</p> <p>The plane is landing and taking off in amongst human beings sailing on wind powered boats, surf boards, kayaks, etc. Recently the take-off of a plane at an airport was aborted because there was a turtle close to (not even on) the runway. Here we are putting clunky old planes directly in the path of humans being buffeted around by often</p>	Comment noted	

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				strong winds so move erratically. There have been many sea planes crashes – to say nothing of the plane that went into the Swan on Australia Day.		
				<u>Feedback form</u> If someone on Hillside wants to erect a single house on the land they buy that should be allowed.	The vision for the Hillside character area is a secluded residential area with a wide variety of building styles and dwelling typologies. In order to achieve this, it is necessary to encourage the amalgamation of lots to form larger development sites, while also allowing smaller buildings to be developed on smaller sites.	
				Bed n breakfast and tourist accommodation (and I note Air BNB is specifically not mentioned) should not be allowed without Strata Company consent.	The draft ACP can suggest designation of land uses as permitted or discretionary. Strata Companies are able to control the uses within their own buildings under Strata Title legislation.	
				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.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.	
				There should be no PUBLIC BENEFIT CONTRIBTION. 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".	The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits. Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution. The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP. Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
				South Perth Council has not given information as to shadows.	It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June. Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.	

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				<p>This plan creates future ghettos, wind tunnels and a "tar and cement" suburb.</p> <p>Independent experts need to look at this.</p>	Comment noted	
				<p>There should be no public benefit contributions. If the proposed plan doesn't conform to the regulations then it shouldn't be allowed.</p> <p>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.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	

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				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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?</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				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	Comment noted	

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				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		
				<p>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.</p> <p>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.</p> <p>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.</p>	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				<p>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.</p>	There is no mechanism to provide a compensation plan for residents and the draft ACP and Amendment No. 61 have been prepared in accordance with the relevant regulations and other requirements.	

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				<p>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?</p> <p>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?</p> <p>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. 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?</p>		
				<p>Infrastructure first and then we look at development.</p> <p>Residents have asked the City of South Perth for certain information which it has refused to give.</p> <p>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.</p> <p>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".</p>	Comment noted	
				<p>I am not qualified to speak on design, 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.</p>	Comment noted	
109	19 July 2019	Email	Neither support nor not support	Supportive of ACP proposed building height limits in map 2, as well as Tiering of the height limits also shown on the Map.	Comment noted	ACP – 27, 28, 33
				The proposed Amendment 61 will improve the environment for the building development in the areas with more proportion of the living space for activity closer to the City of South Perth, foreshore and overlooking the lower levels fronting the foreshore.	Comment noted	
				Strongly object to the "Public Realm" of Richardson Character Areas Mid Block Links and pocket parks. It is unreasonable for the owners to bear the expensive donation of the land building the link or park, pay all ongoing dollars maintain it for the "Public Realm".	Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning	

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				Request clarity for where the parks and links would go.	to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
				The height measurement of the building should be from natural ground level so it is on an even playing field.	Amendment No. 61 measures building height from natural ground level.	
110	19 July 2019	Email	Neither support nor not support	<p>The Department of Fire & Emergency Services (DFES) provides the following comments pursuant to <i>State Planning Policy 3.7 Planning in Bushfire Prone Areas</i> (SPP 3.7) and the <i>Guidelines for Planning in Bushfire Prone Areas</i> (Guidelines):-</p> <p>i. The proposed LP/247- South Perth Activity Centre does not fall into an area designated as bushfire prone pursuant to the <i>Fire and Emergency Services Act 1998 (as amended)</i> as identified on the <i>Map of Bush Fire Prone Areas</i>.</p>	Comments noted	-
111	19 July 2019	Email	Not support	<p>Concerns centre mostly on building heights, un-necessary population growth and longer-term negative social and visual impact on the area.</p> <p>The ACP indicates an increase in population of nearly fourfold. The Peninsula has one main road (Mill Point Road) and a secondary road (Esplanade) for residents to commute. The southern section has only Labouchere Road. The plan contemplates an almost a four-fold increase in traffic congestion and services. That is neither an appealing thought nor an attractive proposition for the existing residents, contemplated residents, tourists or job seekers that the South Perth Activity Centre Plan is apparently targeting.</p> <p>Population will only grow if there is food and shelter. Therefore, the estimated population growth may only occur if shelter is provided and it appears this plan is designed to invite greater numbers by providing that shelter. The plan is creating a problem in its attempt to cater to a hypothetical problem that wouldn't exist if we did nothing at all.</p> <p>Therefore, why does South Perth need 5,000 more people? Population growth does provide a short-term boost but once the building and fit out phase has concluded the population become a strain on services, crime increases, the buildings begin to decay, the demographic changes accordingly and the area becomes less desirable to live in. Obviously the taller the buildings are, the more complicated it is to maintain them and eventually remove them.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	ACP – 16, 17, 18

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				<p>The plan contemplates excellence in design, this is pleasing. However, progress in technology is evolving fast. A well-designed building just 20 years ago would not have incorporated the current standards of green technology. Nor will designs in 2019 meet standards set in 2040. Advances in solar glass windows, hydrogen fuel cells and insulated walls may soon become affordable. Aesthetically buildings also age and there are little provisions made for long-term upkeep of apartment buildings Australia wide.</p> <p>Quality design is one matter, but quality workmanship is another. There is currently talk in the media of a Royal Commission on the building industry. Three apartment blocks (Zetland, Mascot Towers and Opal Tower) have now been evacuated for safety reasons in Sydney. Clearly there are issues with building regulations in Australia. Apartment buildings are built and sold for profit and owners are currently liable for building defects. Builders typically establish a single project companies to avoid longer term liability.</p> <p>While these buildings with defects (Zetland, Mascot Towers and Opal Tower) appear exceptional, shiny and new today, like all high rises around the world, they will date, fall out of fashion (aesthetically and technologically) and appear old among more modern neighbours in the decades to come. I do not wish for this problem in South Perth.</p> <p>High rises are not easy to remove, one will need to buy out all the owners and demolishing such is no simple task. Instead, such buildings typically survive and become eye soars, I offer the aging street scapes of Hong Kong and Manhattan as examples. And, as the buildings age and decay, so does the demographic and the area become a hot spot for crime.</p> <p>South Perth does not need high rise buildings, I suggest a firm height limit of 9 or maybe 10 floors. There are no public concessions that can compensate for traffic congestion, rising crime, and aging apartment buildings.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which represents Australian best practice. Buildings seeking additional height are likely to consider higher ratings to meet other design outcomes and demonstrate design excellence.</p> <p>The Green Star rating system includes many aspects of sustainable development, of which energy is only one.</p> <p>Standards of construction and technology will continue to be reflected in new buildings. Older buildings will continue to be upgraded and renovated as they age until a time where it is more economical to rebuild rather than renovate. This is the case for any development.</p>	
				<p>The thought that a train station may compensate or help alleviate the traffic issue is hideous. Trains bound for Perth are often full by the time they pass through Canning bridge. Further, those who currently enjoy the excellent bus service in south Perth will not tolerate being dropped off at a train station and having to wait for an additional service to reach Perth.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The capacity of trains will be a consideration in the future planning for a new station at South Perth and METRONET in general.</p>	
				<p>Amendment 61 currently invites discretion and concession by failing to clearly address clear building limits, setbacks and shadows over our streets and zoo, this is not an acceptable technical document.</p>	<p>Unlimited heights are not proposed in the draft ACP and proposed Amendment 61.</p> <p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP.</p>	

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					<p>Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p> <p>Properties immediately adjacent to Perth Zoo on Labouchere Road cannot be taller than approximately 17 storeys (the Pinnacles building is 20 storeys). In addition, the impact of shadow on the Zoo has been taken into consideration and each development will be assessed on its merits.</p> <p>It is reasonable to include specific provisions in Amendment No. 61 that ensure the Zoo is protected from overshadowing.</p> <p>A modification to the ACP is recommended to add an objective and requirement to limit overshadowing of the Zoo.</p>	
				South Perth is a suburb not a CBD, the suburb has a long history, a character and a community feel. It does not/should not be turned into a CBD with high rise buildings, shops, traffic congestion and all the problems such invites.	Comments noted	
112	19 July 2019	Email	Neither support nor not support	<p>Whilst we broadly support many of the initiatives of the overall plan, we wish to register our extreme concern at what we believe is an unintended consequence of the proposed Amendment 61 in relation to the small number of residential blocks along the eastern section of South Perth Esplanade which have been included in the “Mends St” section of the Activity Centre Plan.</p> <p>Under the proposed Amendment 61 the side and rear boundaries of these blocks will be reduced to zero in line with the commercial areas of the Mends St section thus changing the look of this foreshore area where the current separation of buildings and associated landscaping adds aesthetic value to these foreshore blocks running east towards the park.</p>	<p>The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres.</p>	ACP - 2, 11 & 12 A61 – 1, 11
				Of more serious concern is the fact that the building height as currently proposed under Amendment 61 is the vertical height of 14.5m (and a Tier 1 height limit of 17.5m) from the AHD unless the height difference of the contours is greater than 3.5m, in which case the building height limit may be taken as anywhere within the envelope of a line parallel to the natural contour of the land	Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.	

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				<p>As two of these properties have a sand hill on the southern side of the sewer line of approximately 12m in height this proposed change (coupled with zero setbacks on the rear and side boundaries) would allow space a 3 storey podium with a 5 – 6 storey tower section to be erected along the rear and side boundaries of the two blocks immediately in front of Darley Heights and be stepped down the block in line with the contour of the land. Bridging the sewer line, whilst still maintaining sufficient height for access along the line, would be a simple matter for experienced architects/engineers.</p> <p>A development of this type on these two blocks would give a “congested” appearance to this section of South Perth Esplanade out of keeping with the blocks on either side of them particularly when viewed from the river or the city. The chance (and impact) of a development of this kind would be more likely if these two blocks were amalgamated.</p> <p>It goes without saying that a development starting at the rear and side boundaries and stepping down the rear section of those two blocks would have a major impact on the privacy, amenity and views of many of the residents of Darley Heights, Goldman Apartments, Bellray and to a lesser extent Esplanade Court. Recently built properties along South Perth Esplanade to the west of these two blocks would also be affected.</p> <p>To address these concerns we hereby request council amend the proposed changes under Amendment 61 and :-</p> <ul style="list-style-type: none"> • Retain the existing side and rear setbacks on the residential blocks on the eastern end of South Perth Esplanade • Retain the existing requirements under General Development Requirements Section 6.1A (2) (b) which reads as follows:- “In the case of a development site having a boundary to South Perth Esplanade, or required by clause 6.9 to be filled in order to achieve the prescribed minimum ground and floor levels, the height of a building shall be measured from the level of 2.3 metres above Australian Height Datum.” <p>These amendments to proposed Amendment 61 would ensure that these two blocks remain visually in keeping with other blocks along this small strip of residential property and that the height limit of any development is maintained across the entire block regardless of any change in the blocks elevation.</p>	The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.	
113	19 July 2019	Email	Not support	<p>Map 2: Building height and plot ratio limits - Discrepancies</p> <p>This map shows the rear of numbers 97 and 99 South Perth Esplanade, in dark blue indicating a 50m or more height limit. The Council has advised that this is an error but it is still part of the proposed Amendment 61. Errors must be corrected</p>	There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.	ACP – 17, 19, 22, 23 A61 - 11

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				<p>Tier 2 height built on a steep slope</p> <p>The notion that the slopes at the rear of 97 and 99 could be considered a higher level for the purpose of split-level developments is flawed – they are slopes. Height limits must be based on Australian Height Datum and the height limits need to apply to entire blocks, the same as 93 and 95 South Perth Esplanade.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p>	
				<p>Mill Point Road North</p> <p>Destruction of the unique ambience of this tree-lined street and construction of densely packed high rise on large podiums would rob South Perth of its character and attraction. Setbacks must be at least 4 metres and increased height limits must be restricted to south of Ferry St.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>Traffic congestion – foreseeable risk</p> <p>It is crucial that traffic flows are orderly and do not create foreseeable risk. An increase in high-rise development along the foreshore and in the Peninsula would vastly increase traffic congestion.</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
				<p>Population growth</p> <p>High-rise development must be based on realistic 10 year population growth estimates. ‘Ghost’ cities of vacant apartments at the cost of lost character would be poor planning and would fail to meet the WAPC infill objective.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p>	

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					<p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>Perth Zoo</p> <p>Perth Zoo is not a ‘public good’ because non-payers are excluded from using it as a recreational area. This error in calculating density must be rectified.</p>	<p>The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.</p>	
				<p>Overshadowing</p> <p>Solar access as well as the shadow effect of high rise buildings must be considered. Residents are suffering from this omission and the shadow cast by a newly constructed high-rise building in the Richardson area has made new owners regret buying in our area.</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	
				<p>De-watering problems</p> <p>In previous developments, the rising water table has disrupted sewerage and twenty-four hour water pumping is required to avoid flooding. Suitable membranes that are used in other cities are required to accommodate underground parking</p>	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
114	17 July 2019	Email	Not support	<p>I believe that document’s perspectives to be sound and logical ones, indicative of the broad groundswell of ratepayer opinion both in the Peninsula and beyond.</p> <p>Submitter is a ratepayer of the South Perth ward, and not the Peninsula directly; however, my quality of life, living and investment advantages from residing in the CoSP are impacted. As a ratepayer I am convinced that whilst in theory the City has provided me with opportunities to air my views on redevelopment, in practice these views (mine and others’ views) are disregarded or are subjected to bureaucratic furphies that ultimately negate any feedback value.</p> <p>I am in contact with both the Minister and shadow Minister in the same vein, as I feel they need to rein in what is rampant authoritarianism by council directors in regard to planning and the manner in which ratepayers are treated. This strategy, in my opinion, has been orchestrated and driven by the current CEO, who, on the</p>	As per Submission 5 Response	<p>ACP – 7, 16, 17, 18, 19, 22, 23</p> <p>A61 – 2, 7, 8, 11 – 17, 20-28</p>

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				<p>evidence available, does not have the interests of ratepayers foremost in his vision.</p> <p>The real baseline reality is that I and other ratepayers are customers. We are customers of all levels of government, and as such are protected by rights. In regard to these, we deserve to be heard, not just given lip-service through apparently open feedback opportunities that are, in my opinion, mere window dressing on a much less savoury reality.</p> <p>Remainder of submission is as per the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response</p> <p>Finally, if planners insist that such and such will never happen then exclude it as an option.</p>		
115	16 July 2019	Email	Support	<p>Supportive of the following aspects of the ACP and Amendment No. 61:</p> <ul style="list-style-type: none"> Proposed building height limits seem to be fair, despite potential to impact river and city views. Agree with all the heights shown on Map 2 the Esplanade is basically flat so submission supports the Amendment No. 61 proposal to measure the building height from the Natural Ground level the tiering system and slimmer towers will mean fewer disruptions to existing view corridors. 	Comments noted	ACP – 27, 28, 33
				<p>Not supportive of the following aspects of the ACP:</p> <p>Private owned Public Open Space, such as Pocket Parks and Mid-Block Links. If the City wants them they should pay for the space and meet the cost of their ongoing upkeep.</p> <p>Are the proposed locations of these Pocket Parks and Mid-Block links fixed as suggested, or are they proposed? Submitter would like a lot more discussion before supporting those proposals.</p>	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
				<p>Submitter not against Public Contributions paid by developers, but if the City collects Public Contributions would like to see them spent to purchase the land as well as pay for the upkeep of any Pocket Park or Mid-Block link, or go towards the Railway Station or road modification so the proposed number of residents can access the Freeway.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions.</p>	

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					<p>This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
116	17 July 2019	Email & Feedback Form	Not support	<p><u>Email submission</u></p> <p>Submitter is aware that the City of South Perth Councillors have approved a plan to increase building heights on the foreshore from the existing 25m level to 37.5m from Fraser Lane to Mends Street. Originally the height limit was 17.5m but amended to 25m and now proposed at 37.5m, which is more than double the initial limit. This is a massive height change and detracts the overall living perceptions of South Perth to us and we highly disapprove of this.</p> <p>We have decided to move to South Perth and pay premium prices to see an uninterrupted look of the foreshore and city views and strongly oppose to high rise development that will change this landscape significantly. This is a significant change to the current limit and as representatives of residents in South Perth, this is highly not in our interests. We believe our interests need to be taken into consideration highly and this is highly concerning that such a significant change has been approved.</p> <p>In the submitter's case, the apartment is for their grandmother who is a retiree. The submitter paid a premium of up to \$250k EXTRA for views beyond the 25m "Clear View Line" which was heavily promoted by selling agents. We will not only lose the clear views but will suffer substantial financial losses of up to \$350k when stamp duty and commissions are factored in. How can this be in the best interest of us, the residents, and we highly oppose the Council's recent decision.</p> <p>Submitter is aware that on the 6/3/19, the City of South Perth held a Special Meeting where the Councillors unanimously approved a scaling back of building heights along the Esplanade from 24.3m to 17.5m from the Narrows Bridge up to Fraser Lane but unfairly ignored the impact of higher levels from Fraser Lane to Mends Street, where 37.5m proposed. The rationale for Council scaling back the heights was "<i>that the Esplanade heights should be preserved with a low typology to provide a better interface to the foreshore and an appropriate transition to the higher buildings along Mill Point Road that enjoyed existing views.</i>" The above same criteria should also have been applied to the AURELIA apartment building. An EQUITABLE outcome would be for the height limit to revert to the original 17.5m in uniform with all the land fronting South Perth Esplanade.</p> <p><u>Feedback form</u></p>	Refer to Submission 1	ACP 11 & 12

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				<p>For all further developments to revert back to the 17.5m limit.</p> <p>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 detrimental to existing owners view of the skyline.</p>		
117	16 July 2019	Email	Not support	<p>It is utterly confusing that the council will reduce the height in two sections of the South Perth Foreshore and increase the height to 37 metres in an area where three major apartment projects have been completed in the last 12 months and all three will suffer from the height changes.</p> <p>Submitter purchased a 13th level apartment in Aurelia with views, and were told by the developer that the views could not be built out. This is a retirement home and the council have reduced the value of the investment along with many others in Harper Terrace. In a real estate market that is already struggling this is astounding.</p> <p>The Council have changed the height restrictions from 37 metres to 17 metres in one section of South Perth Esplanade; however increased the height between Mends Street and Fraser Lane from 24 metres to 37 metres. This is discriminatory.</p> <p>This criticism is based on the outcomes of the CoSP community consultation process over the past few years in regard to massive individual tower developments and the significant feedback and criticism levelled at the Council by individual ratepayers, community groups, the WAPC, the DoP, and the Minister for Planning and the State Government.</p> <p>The City of South Perth does not project a feeling of confidence by continuing to display indecision throughout the future planning of the community and continues to overdevelop the foreshore areas at the behest of private enterprise.</p> <p>Now is the time for the City of South Perth to stand up for its community and advise the Minister and the development industry that it will no longer support ad-hoc tower proposals in a suburb which already meets density targets.</p>	Refer to Submission 1	ACP 11 & 12
118	15 July 2019	Email	Not support	<p>Strong opposition to ACP for the following reasons:</p> <ul style="list-style-type: none"> The proposed building heights will result in development impacting the skyline and impede access to sun and views from buildings behind. The plan is discriminatory towards certain ratepayers, as it only includes a small section of the land on the foreshore. Decision benefits some developers who have purchased the land where the height restrictions are changed. 	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p>	ACP - 11, 12 A61 - 11

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				<ul style="list-style-type: none"> Contradictory to recent Council support for preserving the current height restrictions on the foreshore 	<p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	
119	14 July 2019	Email	Support	Generally supportive of the ACP for the following reasons: Strongly supportive of proposed heights in Schedule 9B map 2. Agree that the placement of maximum height on Mill Point Road where new development already exist, in Hillside and Mends where there are already tall buildings and are situated on a hill, and in Richardson which is the part of the City that needs development more than any other area.	Comments noted	ACP –27, 28, 33
				Strongly supportive of the tiering system for building height limits and plans for slimmer, taller towers. This will allow more people to live within and experience river or city views.	Comment noted	
				Strongly support the public benefits contribution for building above base building height limits. These funds should be used in the short term be used to improve Traffic and Pedestrian management, and in the long term to fund a railway station, this is much more practical than Public Art.	<p>Comment noted</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				Strongly support the method of measuring building height from natural ground level, as opposed to the existing measurement from 2.3 AHD as this can result in any building being higher than it needs to be which will diminish residents' views.	<p>Comment noted</p> <p>Amendment No. 61 measures building height from natural ground level.</p>	
				Strongly do not support Pedestrian Mid-Block Links, an idea that seems very impractical as the plan identifies fixed locations between individual lots that all have street frontages and abut each other at the rear. This seems unachievable and an administrative nightmare.	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
120		Email	Support	Building Size (Height and Plot)	Comments noted	ACP – 2

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	14 July 2019			<p>1. To what extent do you support the objectives for building height in the draft ACP?</p> <p><i>Objective i.</i> To ensure that building heights are consistent with the desired future scale and built form of the activity centre and character area.</p> <p>Strongly support</p> <p><i>Objective ii.</i> To ensure that the interface between character areas is appropriately managed.</p> <p>Strongly support</p> <p><i>Objective iii.</i> 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.</p> <p>Strongly support</p> <p><i>Objective iv.</i> To establish a consistent and transparent performance-based approval process that accommodates additional development potential in return for public benefit contributions in appropriate locations and development proposals.</p> <p>Strongly support</p> <p><i>Objective v.</i> To locate larger scale developments within walking distance of the Mends Street ferry terminal and the future South Perth train station to optimise access to transit services for new development.</p> <p>Not against</p> <p>2. To what extent do you support the objectives for plot ratio in the draft ACP?</p> <p><i>Objective i.</i> To control the amount of development permitted on any development site within the defined building envelope.</p> <p>Support</p> <p>Objective ii. To provide sufficient space within the building envelope to encourage variation in building design and response to individual site conditions.</p> <p>Strongly support</p> <p><i>Objective iii.</i> To encourage building designers to consider the best allocation of plot ratio area.</p> <p>Support</p> <p>3. To what extent do you support the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61?</p> <p>Support</p>		A61 – 1, 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				<p>4. What changes would you suggest to the requirements for building height and plot ratio in Schedule 9B of proposed Amendment No. 61?</p> <p>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.</p>	<p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p> <p>The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres.</p> <p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p>	
				<p>5. Do you think the proposed tier system for building height and plot ratio limits in Schedule 9B of proposed Amendment No. 61 are appropriate?</p> <p>Yes</p> <p>6. Please provide a reason for your answer.</p> <p>I believe we need to maintain reasonable views to the greatest extent possible for residents which the tier system achieves in most cases.</p>	Comments noted	
121	13 July 2019	Email	Not supportive	<p>Not supportive of the ACP for the following reasons:</p> <ul style="list-style-type: none"> The peninsula of South Perth is a UNIQUE residential area of Perth. huge multi storey buildings destroy lifestyle, vision and sunshine from a very special, heritage area. Huge building towers are only money in the pockets of billionaires who have no regard for the residential culture Should be a beautiful park and shopping on the corner of Mill Point and Labouchere Roads There is no room for revised traffic systems in the area unless an overpass is built. We need more trees. Not roads. Infill everywhere is just a fad. There is already enough in the South Perth Peninsula. Changing what is there is not always for the better. Keep it simple, quiet and beautiful. 	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 - 11
122	12 July 2019	Email & Feedback Form	Support	<p><u>Email submission</u></p> <p>Support the proposed maximum building heights (14.4 and 17.4m – Tier 1) for the lots fronting South Perth Esplanade.</p>	Comment noted	A61 - 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				<p>Concerned about where height is measured from due to the slope of three lots at the eastern end of South Perth Esplanade. The ground slope could potentially mean buildings are built to a height that results in loss of amenity to neighbouring lots.</p> <p>Support for greater setbacks to the rear property boundary of lots fronting South Perth Esplanade or alternative provision for measuring building height to ensure the rear of the three lots that are sloped are not measured from the highest point of the lot and do not result in development exceeding 14.4 and 17.4 metres.</p> <p>Building height limits should maintain reasonable views from existing buildings, which the tier system is understood to achieve.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p>	
				<p><u>Feedback form</u></p> <p>Owners at Bellray Apartments in Ray Street support the proposed building heights (14.4 and 17.5 metres - Tier 1) for the Esplanade, but 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.</p> <p>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 Water 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.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p> <p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p>	
123	5 July 2019	Email	Not support	Submission expresses disappointment at the change to building height limits for the area from Fraser Lane to Mends Street without notice and response. This is clearly a very unfair decision for all residents who will suffer negative effect in monetary or non-monetary terms if a high rise building of 37.5 metres height is constructed there.	Refer to Submission 1	ACP 11 & 12
124	21 July 2019	Feedback Form		<p>I do not support any height increases above the height of buildings currently existing in the Mill Point Area.</p> <p>I do support the proposed height increases for the Mends Street Area but would prefer this did not include buildings north of the Judd Street alignment and Ferry Street.</p> <p>I support the proposed tier system but not any proposed height increases in the Mill Point Area.</p>	<p>Comment noted</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 - 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				Setbacks should be sufficient in all cases to ensure that the London Plane trees in the Mill Point Area are not damaged. Happy with setback proposals so long as they do not impact on the London Plane Trees	Comment noted. Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future). The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.	
				Do not want to see building heights increased above the existing heights that currently exist in the Mill Pont Area.	Comment noted	
				Happy with the height proposals as they relate to the Richardson, Mend Street and the Hillside Areas.	Comment noted	
				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, Mends and Hillside.	Comment noted	
				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.	Comment noted.	
				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.	Comment noted	
				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.	The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options. Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport. The maximum parking requirements for commercial development seek to achieve a similar outcome by encouraging workers to access the site via more sustainable transport options.	

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				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.	Comment noted	
				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.	Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3. The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping. Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.	
				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).	Comment noted Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.	
				I do not support the building of a South Perth train station in the proposed location or anywhere between Elizabeth Quay and Canning Bridge.	Comment noted	
				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.	Comment noted	
125	16 May 2019	Email	Not support	The document is too difficult to comprehend.	Feedback has indicated that there is some confusion in the reading of the documents. Some improvements are recommended.	-
				Not supportive of building heights above 30 storeys. There needs to be certainty regarding building height within the ACP area and building height limits should not be able to be exceeded.	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	
126	17 June 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	Refer to Submission 1	ACP 11 & 12
127	17 June 2019	Email	Neither support nor not support	Submission from a resident, business and land owner in the ACP area who is also a member of the Stakeholder Reference Group for the past 3 years.	Comment noted	ACP –2, 11, 12, 27, 28, 33 A61 – 1, 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				Not supportive of the expanded ACP boundary.		
				Not opposed to high rise provided that any increase in height does not impede on others' rights.	Comment noted	
				<p>South Perth Esplanade should have the same building height limit as is permitted under the existing Town Planning Scheme No. 6, wherein the area from Frasers Lane to Mends St has a building height limit of 25m to highest habitable floor (9 storeys).</p> <p>Since Amendment 25 was implemented circa 2014:</p> <ul style="list-style-type: none"> Aurelia has been constructed with new owners led to believe the available views above level 9 would be retained, I believe it grossly unfair to now impose higher buildings than originally stipulated in front of them. REVA has just been completed and Echelon on the cnr of Mends St is now nearing completion and both structures are already below ACP height limits proposed. <p>The new height limit proposed – Medium Tier 1 now facilitates 37.5m (12 storey) a 300% increase on the original (pre-Amendment 25) heights for this section.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The existing Town Planning Scheme No. 6 has a building height limit of 25 metres in this area, which is measured to the finished floor level of the upper-most storey. This allows for a building of up to approximately 30 metres height in total. Properties on South Perth Esplanade to the east of Harper Terrace are able to have additional height above this building height limit, with no upper limit on building height. Tower setbacks are required to be 4 metres or less and there are no tower floorplate area limits.</p> <p>In the location subject to this submission the permitted height of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the permitted height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>Whilst it is recognised that the existing development 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 (and noting that such a right is also subject to potentially unexpected impacts such as natural disaster response etc).</p> <p>Where no such restrictive covenant or other legally binding agreement exists, a buyer should assume that the planning frameworks may be subject to change and should be prepared for future planning review such as large-scale precinct planning. The detailed structure planning of the South Perth area has been foreshadowed for some time.</p> <p>It is not recommended to decrease the building height limit in this location. However it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	
				<p>The South Shore Centre on the corner of South Perth Esplanade and Mends Street has development permitted to Tier 2, which facilitates 60.6m (20 storey) a 500% increase which I consider outrageous.</p> <p>A building of this scale in this location will dominate and overwhelm the locality. It should be limited to 9 storeys as per the height from Mends Street to Fraser Lane. The dotted yellow line should be taken from this site.</p>	There is opportunity for landmark development on the subject site that provide a gateway focus from the ferry and Elizabeth Quay. However it is recommended to investigate the extent of tier 2 development potential on the site.	
				The front yard of Esplanade Court at 87 South Perth Esplanade could be increased to 9 storey and 91 South Perth Esplanade increased to 7 storey to give balance to the future skyline.	It is not recommended to increase the building height limit for Tier 1 Additional Building Height in the low height type from the advertised 17.5m.	

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				<p>The North side of Ray Street is situated on an escarpment and the height limit of High-Tier 2 will enable redevelopment to the highest level in South Perth, (potentially 41 storey), a 500% increase, which will dominate the surrounds. The dotted yellow line should be redrawn up the middle of Darley and Ray Street and return to Mill Point Road on the line of the sewer easement bisecting the Windsor Hotel.</p>	<p>However it is recommended to investigate the extent of tier 2 development potential in the Hillside character area.</p>	
				<p>The Plan released for consultation has an anomaly that numbers 93 – 99 South Perth Esplanade inclusive have titles dissected by the sewer easement and the building height limits map shows different height types North and South of the Easement. The height type should be Low Tier 1, the same as South Perth Esplanade.</p>	<p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p>	
				<p>Peninsular Apartments at 59 South Perth Esplanade has a Medium-High classification mid- way through the site. This site together with the adjoining Ferry Court Lot should be limited to Medium Tier 1 Height, as per the adjoining classifications along South Perth Esplanade.</p>	<p>Comment noted.</p>	
				<p>Not opposed to reducing setbacks provided they don't impinge on neighbours' rights, as is created with the proposal to reduce them to 3m from 49 – 61 South Perth Esplanade.</p> <p>South Perth Esplanade changes direction on the boundary of 63 & 65 South Perth Esplanade.</p> <p>Number 63 is a modern luxury apartment complex completed to 4 storeys and 12m setbacks.</p> <p>A logical point to change the street setback from 3m to 12m would be on the North boundary of number 63 where it adjoins South Perth Esplanade. Otherwise the narrow frontage could create a narrow canyon at street level.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p> <p>It is recommended to review street setback requirements throughout the ACP area to ensure that they support the relevant character area and streetscape objectives.</p>	
				<p>Royal Perth Golf Club freehold land on the corner of Amherst Street and Labouchere Road is not included in the ACP area and I would request the boundary of the ACP be expanded to include the clubhouse with a classification of High height type.</p>	<p>Royal Perth Golf Club is subject to an MRS reservation for 'Parks and Recreation. The draft ACP cannot modify this reservation and this responsibility rests with the State government.</p> <p>The South Perth Activity Centre Plan has been prepared on the basis that forecast growth can be accommodated within the parameters of the draft plan.</p> <p>Without any indication from the State government that it intends to modify the Parks and Recreation reserve, it is considered inappropriate for the South Perth Activity Centre Plan to consider development on the reserve.</p>	
				<p>For simplicity Ground level should be a Datum reference and stipulate 2.3 AHD as a minimum.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p>	

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				Commercial zoning along South Perth Esplanade should be limited from the eastern boundary of the South Shore Centre on the corner of Mends Street to the Western boundary of number 67 South Perth Esplanade on corner of Harper Terrace.	The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area.	
				Flexibility should be given to the location of mid-block links, especially where 3 or 4 lots have been amalgamated.	Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
				The requirement for excellence in design is admirable, however the need to engage 3 architects will only add dramatically to cost.	All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel. Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design. Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area. Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits. It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.	
				Stipulating apartment mix is not recommended along the peninsular section of Mill Point Road nor South Perth Esplanade whereby a developer in endeavouring to produce first class product will want to appeal to a specific demographic and combining 1 bedroom and even 2 bedroom apartment in a luxury complex may not be desirable.	The ACP aims to support the growth of a range of household types and the development of a range of housing types, including variety in built form, size and typology. The proposed ratios of dwelling sizes in development requirement 3.2.1 also reflects the requirements of State legislation.	

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				Minimum car parking restrictions is fine however maximum requirements should be removed altogether to facilitate a developer providing true luxury to suit buyer requirements.	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				I do not support the proposal for a developer to pay for additional Tier 2 plot ratio, the additional cost of going higher together with a reduced tower footprint should be sufficient community benefit.	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				The ACP should contain some major future infrastructure provisions to divert through traffic around the area via tunnels, on -ramps or bridges.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
128	27 May 2019	Email	Not support	Not supportive of podiums within the ACP area, particularly being built to the boundary. This results in amenity impacts to neighbouring sites.	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are</p>	<p>ACP – 7</p> <p>A61 – 3, 7, 8, 12-18, 20-28</p>

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					<p>recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				Supportive of the need to increase density and that some buildings are ready to be redeveloped, but the community does not agree with the density proposed, which is 3 times greater than what is required by State Planning Policy.	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none">• The retail and other commercial services that the centre provides• State government policy to accommodate residential growth in the inner city as greater Perth grows• Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				The draft ACP has not outlined in detail the impacts that population increase will have to existing nearby schools or any need for additional schools.	Education facilities are allowed as a discretionary ‘D’ Use. The Department of Education has commented on the draft ACP and is in the process of reviewing State strategic planning documents to determine the need for additional facilities.	
				Adequate public transport and other transport infrastructure needs to be provided prior to introducing additional density, rather than population increase prior to adequate servicing.	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
				Concerned with impacts on property value and access to views, ventilation, sunlight, parking and traffic congestion. Whilst an	Comments Noted.	

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				increase in density is needed, loss of general amenity in the area will be inevitable and is not supported.		
129	3 June 2019	Email	Not support	Traffic congestion will be a major problem in the Mill Point Road and Mends Street area. Development should be managed rather than limited. The train station should be delivered with urgency as a solution to traffic congestion.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.	-
130	15 May 2019	Email	Neither support nor not support	Concern for the number of vacant lots within South Perth. Suggestion that owners of vacant lots should maintain them or allow them to be used as parks/gardens	Comment noted	ACP – 6, 9, 11, 12 A61 – 13-19
				Lack of community leisure centres/gymnasiums/pools should be addressed in ACP, particularly to attract a younger community. There is a lack of child care centres, which again deters young families from moving into the area and build the community.	These uses are discretionary in Mends, Richardson, and Hillside Character Areas with a DC or D use. It is recommended that Indoor Sporting Activities be included as a DC use in the Mill Point Character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.	
				South Perth would benefit immensely from a train station and it would only make sense that the closest suburb to the CBD stayed connected with better and faster public transport.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed.	
				Opposed to the recent application for a 49 storey building adjacent to an existing 3 storey apartment building.	Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings. It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.	
				Support for a building height limit that is supported by the existing community to control development.	Comment noted	
131	15 May 2019	Email	Support	Support for a South Perth train station and question why it was not constructed when the Perth-Mandurah line was built.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed	-

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132	14 May 2019	Email	Support	<p>Support for tiered building height limits along South Perth Esplanade (both east and west of Mends St). High buildings along the foreshore would impact the amenity of people who utilise the river and foreshore. Height should be concentrated away from foreshore.</p> <p>Very high rises would also obstruct many views from existing buildings whose owners paid a high price for a river view and were assured by council prior to purchase that a maximum of 5 storeys along the foreshore was strictly adhered to.</p> <p>Supportive of the Council listening to the public and amending the Activity Centre Plan to reduce the height limits along the entire foreshore from the original plan.</p> <p>Would be supportive of lowering the heights even further to maintain the existing 5 storey limit east and west of Mends Street.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>It is not recommended to decrease the building height limit in this location. However, it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	ACP – 11, 12
133	5 July 2019	Email & Feedback Form	Not support	<p><u>Email submission</u></p> <p>37m high buildings on South Perth Esplanade will significantly impair the value of investments. The height limits should revert to the original 17.5m in uniform with all the land fronting the Esplanade. 17.5m from the Narrows Bridge up to Mends Street.</p> <p><u>Proforma</u></p> <p>Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1</p> <p><u>Feedback form</u></p> <p>Scaling back of building heights along the Esplanade from 24.3m to 17.5m</p>	Refer to Submission 1	ACP 11 & 12
134	19 July 2019	Email	Not support	We totally support the submission to cut back proposed height changes between Fraser Lane and Mends Street to make the same height limits as between the Narrows Bridge and Fraser Lane.	Refer to Submission 1	ACP 11 & 12
135	19 June and 18 July 2019	Email	Not support	<p>The impact of the ACP is of major concern in the area from the Judd Street/Mill Point Road intersection down to the Old Mill. Mill Point Road in this strip has problems handling traffic and it is going to get a lot worse as it becomes a major road.</p> <p>Unrestricted developed must not be allowed.</p> <p>The Draft Activity Centre Plan and the supporting Place and Design Report do have some very good principles but it is vital that what is in the plan is adhered to when a development proposal goes before JDAP</p> <p>The document lacks strong requirements and statements that ensure the objectives are met.</p>	As per Submission 5 Response	<p>ACP – 7, 16, 17, 18, 19, 22, 23</p> <p>A61 – 2, 7, 8, 11 – 17, 20-28</p>

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
				Remainder of submission is the South Perth Peninsula Action Group pro-forma submission. As per Submission 5 Response		
136	19 July 2019	Email	Neither support nor not support	<p>Generally supportive of ACP, but concerns with the following</p> <p>Some blocks have two zonings on the one block however I am advised that this anomaly is a mapping error and will be rectified.</p> <p>These blocks also have allowable zero side and rear setbacks, which is not in keeping with the recently completed adjacent developments and would spoil the aesthetics of the area when viewed from the river and the city opposite. The current provisions on side and rear setbacks should be retained.</p> <p>Coupled with the comment above, since the land at the rear of the blocks slope up a hill by some 11m, the building height may be measured from the level of the existing land and follow the land contour. A developer can easily design a structure to span the drain easement and comply with the relevant requirements. Such a structure would markedly interrupt the vista of the locality. Such a development would be especially viable if the blocks were to be amalgamated and, if realised, would seriously impact the amenity of the residents of Darley Heights as well as those of adjacent properties. The building height for these blocks should be limited to 14.4m from the AHD plus 2.3m.</p>	<p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p> <p>The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres.</p> <p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p> <p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p>	ACP - 2 A61 – 1, 11
137	19 July 2019	Email	Not support	<p>Very disappointed with the South Perth Council for allowing for so much High Rise in the South Perth Precinct. Is it really for the expected enormous increase in population that is proposed for South Perth or simply for developers to increase their wealth? Or hopes for a railway station to service South Perth residents? Who will be able to afford to live in these pricey developments?</p> <p>Yet to see any increase in employment opportunities that have resulted in the influx of High Rise developments, apart from construction workers, so where are they? I have only seen increased vehicular traffic along local roads which adds to more pollution.</p> <p>The proposal for South Perth needs to be rethought before it is too late and the whole character of the area is lost forever.</p>	Comment Noted	-
138	17 July 2019	Email	Not support	South Perth Peninsula Action Group pro-forma submission As per Submission 5 Response	As per Submission 5 Response	ACP – 7, 16, 17, 18, 19, 22, 23 A61 – 2, 7, 8, 11 – 17, 20-28
139	18 July 2019	Email	Not support	<p>If we want certainty, there should be no “Discretion” allowed.</p> <p>There must be DEFINITIVE building heights. Therefore, must remove Tier 2</p>	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	-

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140	18 July 2019	Email	Not support	Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1	Refer to Submission 1	ACP 11 & 12
141	18 July 2019	Email		<p>There is a potential problem with the height limits on any future development on 97 & 99 South Perth Esplanade. There is a sand hill (a sloping bank) at the back of these properties which could be used by a developer to build from a higher height than was envisaged for this area. Any future development to these properties needs to keep the buildings at one level for the entire block and at the same height as the two recent buildings next door 93 and 95. Can you please stipulate that these buildings are to be kept at one level at the 14.4m height limit.</p> <p>The consultation which was undertaken by the Planning department was attended by Apartment representatives from The Esplanade court 6 Ray street (63 units), Bellray (14 units), Goldman building 10 Darley street(8 Units), Darley Heights 8 Darley street (40 units), collectively representing over 200 concerned rate paying residents of South Perth.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p> <p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p> <p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p>	A61 - 11
142	18 July 2019	Email & Feedback Form		<p><u>Email submission</u></p> <p>Support the height map in schedule 9b but strongly don't support the proposed change for above ground car bays to be included into the plot ratio. This will force developers to build underground, disturbing water tables which will have problems elsewhere.</p> <p>As it's the city's plan to reduce Height, I suggest the Building Height Measurement all over the City should be from measured from Natural Ground Level</p> <p>The slimmer towers now planned it will allow more Viewing Corridors between buildings, and the building height on edges especially in Richardson being lower than previously allowed, and with the inner area higher there will be many more views for South Perth residents not only the richer residents.</p> <p><u>Feedback form</u></p> <p>Mid block links and pocket parks are an absolute imposition and are not required in the Richardson character area.</p> <p>The position of these links as pocket parks should be a general position not where they are shown on the public realm map.</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.</p> <p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p> <p>Comment noted</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	ACP – 27, 28, 33

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143	18 July 2019	Email	Neither support nor not support	Agree with the Height Map 2 in Schedule 9B; however, the Height and Plot Ratio proposed will affect my views.	Comment noted	ACP – 27, 28, 33 A61 - 11
				Support the height limits of Low and High proposed for my Neighbour at Esplanade Court and which extends down to the Esplanade.	Comment noted	
				Strongly Support the change of Building height measurement on the Esplanade from 2.3 AHD to all measurements starting at Natural Ground Level	Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.	
				Strongly Support the proposed Tiering within the Map 2, as it will allow many more people to share our world class River and City Views.	Comment noted	
				Strongly Don't Agree that the majority of car bays are included in the formula for calculating the Plot Ratio. Submitter's building is situated in the High Height area with a maximum height of 123.3 metres, ie possibly 40 floors and its High Height does not correlate with the Plot Ratio Allowance of 9.8. A quick calculation suggested you would only get possibly 20 to 22 floors with the above ground car bays included in the Plot Ratio. The plan is encouraging developers to build car bays wholly underground, which will be expensive and effect the ground water and then issues will be created elsewhere once the natural ground water levels are disturbed and flow somewhere else, also if you are giving me height then let me build it.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.	
				Strongly Disagree with the City deciding where Pocket Parks and Midblock Links are to be located, especially when the land is being basically ceded to the City, and the City is asking the owners to develop and pay all the ongoing cost for perpetuity, the use might not be negotiable but the suggested positions and creation costs should be up for discussion.	Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
144	17 July 2019	Email	Not support	Not supportive of the ACP for the following reasons: Will result in South Perth looking like an abbreviated Gold Coast or Miami. Infill numbers have not only been inflated and over the top, pandering to greedy developers.	A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support: <ul style="list-style-type: none"> The retail and other commercial services that the centre provides State government policy to accommodate residential growth in the inner city as greater Perth grows 	ACP – 4, 5, 19, 22, 23 A61 - 11

No.	Date of submission	Feedback type	Support/Not Support	Summary of submission	City of South Perth officer comment	Modification Number (refer Schedules of Modifications – ACP & Amendment No. 61)
					<ul style="list-style-type: none"> Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				Proposing building height limits from 16 storeys to 30 storeys (4 times the current approved height limit) along Mill Point Road and surround these lots with 9 to 12 storey apartments (twice or three times the current approved height) will build out all existing apartments that families have spent hundreds of thousands of dollars on, for views of the City and Melville Waters, which will now be infinitely less valuable.	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				Traffic congestion has already started with just one 22 story building and 4 others of reasonable height recently completed. Main Roads and several other experts have registered their strenuous concerns regarding the traffic chaos that will exist should the current set of building applications be approved.	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
				No one knows what will happen if this Activity plan goes ahead.	Comment noted	
				95% of this proposal is for residential accommodation, where is the much flaunted employment coming from?	Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre.	

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					Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. Development requirement 3.1.4 does not prevent development of sites with 100 percent non-residential floor space.	
				The existing water table issues will impact this ACP.	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				Where are the parks and open space planned for?	Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.	
				What will be the tourist attractions in South Perth? A bunch of high rise apartments very likely full of foreign owners and tenants, which you can't get to because the place is gridlocked.	<p>Tourism Council of WA recognises the zoo and the foreshore as tourist destinations in South Perth. Connect South Perth is currently under construction and is outside the scope of the draft ACP and Amendment No. 61.</p> <p>The connection between the South Perth Foreshore, the Zoo and Elizabeth Quay is recognised.</p>	
				If this development has to happen in South Perth, as appears to be the case, has relocating the Royal Perth golf course been considered? Fully support consideration of this.	<p>Comment noted.</p> <p>See submission 40 for Golf Club specific comments.</p>	
145	22 July 2019	Email	Not support	<p>I have considered the Draft Activity Centre Plan and the supporting Place and Design Report and remain concerned that the City has produced planning materials which pay lip service to the need to protect the character of South Perth and existing residents' amenity and yet fail to include the appropriate safeguards to ensure that this much-needed protection will happen.</p> <p>I am not optimistic that the many concerns expressed by local residents about this draft plan will be taken into account. It was clear from the consultation process which led to this draft plan that the views of ordinary ratepayers are regarded (unfairly) as too subjective and not sufficiently expert on planning issues. I accordingly engaged Adjunct Professor, whom many regard as Australia's foremost planning expert, to provide an objective assessment of the draft plan from a planning perspective. His report is at Submission 45.</p>	See Submission 38 and 45.	<p>ACP – 6, 7, 9, 11, 17, 19, 22, 23</p> <p>A61 – 2, 3, 6, 7, 8, 11–19, 20–28</p>

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				<p>The draft plan is exceedingly disproportionate to projected future development, both in terms of the quantity of development proposed and the tall building typologies proposed. Please note his analysis in section 2.2 that the planners have made a fundamental error with respect to the population growth projections.</p> <p>As a ratepayer with a long experience of difficulties with the planning regime in South Perth I am personally concerned that the draft plan continues to facilitate the approval of high rise development by reference to largely subjective criteria coupled with very wide discretions as to height. This will continue to lead to unpredictable development outcomes for the community. Furthermore, this plan fails to take proper account of the cumulative impact of high rise upon the wider community and on the overall built form of South Perth. If this plan is adopted, individual high rise developments will inevitably be approved in random, ad hoc locations scattered across a wide geographic area in South Perth, leading to a confused and disharmonious built form across South Perth.</p> <p>I have three overarching observations with respect to the plan:</p> <ol style="list-style-type: none"> 1. There has been no proper attempt to confine high rise development to those parts of South Perth which actually require updating or modernising of this nature. Development will therefore continue to be driven by whatever sites become available and whatever developers think will make them the most profit. This is the tail wagging the dog. The plan accordingly needs to pay greater attention to assessing which parts of South Perth genuinely could benefit from new development. The plan should specify a narrower range of potential heights for each neighbourhood so that there can be better predictability about what level and type of developments are more likely to be approved. This will assist with the better integration of any taller buildings into the immediate and likely future built form of specific areas in South Perth. The different areas within the Activity Centre Plan need to be considered individually, then collectively to see how the cumulative picture may look. We need to have controls which are well calibrated and consistently applied to achieve the desired outcomes. This plan does not achieve this objective. 2. The underlying assumption in the plan is that high rise development is appropriate for South Perth and yet none of the 		

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				<p>usual planning rationales for the introduction of high rise across the Activity Centre is actually present. The introduction of high rise into a predominantly residential area which is already well served by medium density housing is obviously disruptive and character changing. There accordingly needs to be a basic planning objective to justify such intrusion and disruption. The plan purports to rely on population needs to support the intrusion yet the numbers do not add up. As Professor Evans' report demonstrates, the population data and the present infrastructure do not support the level of development which this plan facilitates. The plan provides for significant excess development capacity over and above the level of infrastructure planned for during the preparation of the plan. That will lead to two possible outcomes, both of which are bad planning: either (i) it will result in largely empty towers, causing only a few isolated towers to be built which will be disproportionate and disruptive to the surrounding neighbourhood or (ii) there will be a greater influx of people from outside South Perth to take up the supply leading to an inability of the City to cope with the increased pressure on resources and requiring significant additional rates to be levied in order to meet the costs. Ratepayers would effectively be funding the profits earned by developers.</p> <p>3. The draft plan includes at least one neighbourhood which should not be subject to high rise development, namely the area north of Judd Street known as the Peninsula. Given the way the public has engaged with the issue of development in the Peninsula over the past 5 years, it is astonishing that City planners are still proposing that high rise development should be facilitated in this area. The public made their feelings about the Peninsula very clear in petitions, in resolutions made at a Special Electors' meeting in May 2015 and in conversations with their elected Councillors. The community did not wish the Peninsula to be included in the Special Control Area under Amendment 25 and asked the Council to ensure that building heights in the Peninsula remained limited to the existing 8 storey prescribed height. In the second public consultation process on Amendment 46, the question of whether the Peninsula should be excluded from the Peninsula was specifically addressed and many submissions about it were received from the public. At a meeting of the Council on 26 April 2016, the Council approved a version of Amendment 46 which</p>		

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				<p>excluded the Peninsula from the Special Control Area in response to what the Councillors regarded as an overwhelming public mandate.</p> <p>For reasons which were never made public, the Minister for Planning ultimately reversed this (and made other changes to Amendment 46 contrary to the wishes of the community) but the fact remains that the South Perth public, through their elected representatives, have made their views clear. There would therefore need to be overwhelming planning reasons for City planners to override the democratic process in South Perth. Objective readers will look in vain for any valid justification for the inclusion of the Peninsula in the Activity Centre Plan. In fact, all relevant factors point the other way:</p> <p>(i) High rise developments will not "enhance" the area. Quite the opposite. The Peninsula is already well developed, with attractive medium rise apartments nestled within its leafy landscape.</p> <p>(ii) Very few development sites exist in the area so any high rise will be anomalous, ad hoc and out of proportion to the existing and future built form.</p> <p>(iii) The character of the area will be irretrievably lost should even one or two high rise towers be built on or near the historic avenue of London Plane trees. Under the draft plan a new 33 story building could be built next to the trees, amongst existing 8 storey buildings. The 33 storey building would have a podium at a nil side setback, and a huge tower at 4.5 metre side setback. Such a disharmoniously visual impact will not be assuaged by claimed upgrades to the public realm. No alleged "benefit" from such a high rise tower could possibly compensate for this loss of character and amenity to the area.</p> <p>(iv) High rise in this area would not support the case for a railway station. The Peninsula is 1.3 kilometres away from the proposed railway station - furthermore, those residing in high rise towers are likely to add to the traffic congestion by using cars.</p> <p>The only possible reason to include the Peninsula in the Activity Centre Plan is to accommodate the commercial desires of a single developer which has attempted on several occasions to secure planning permission to build a high rise tower at 74 Mill Point Road. It would be improper, however, for such a</p>		

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				<p>consideration to influence the City planners. This is not a relevant planning consideration and would be favouring the interests of an outside developer over those of the many hundreds of ratepayers (and visitors) who have indicated that they do not want high rise buildings in the Peninsula. If the sunk costs of a developer were ever relevant to deciding whether to permit high rise development in an area (and they are not) they would be outweighed by the sunk costs of the ratepayers (including myself) who have cumulatively spent far greater time and resources to oppose inappropriate development on this site and who stand to gain no commensurate financial gain. Residents have given countless hours of their time and made many personal and financial sacrifices because they genuinely believe that it is in the interests of the community and of Perth to preserve the Peninsula's heritage and character from inappropriate development.</p> <p>Despite of all this, I fear that the views of just a one or two developers with short term interests in the Peninsula will be given more weight by planners. I accordingly urge those responsible for finalising this plan to consider Professor Jones' objective analysis of what would be the appropriate approach to development in the Peninsula. You will note his conclusion at 4.2 of his report: <i>Given the unique built form of the Peninsula and the need to focus the limited amount of future development in the station precinct, the Mill Point Peninsula should be removed from the Activity centre Plan and revert to planning controls extant prior to amendment No 25. Additional height buildings in Mill Point should only be contemplated on the prominent corner of Mill Point Road and Judd Street and then into the Richardson station precinct.</i></p> <p>I have reviewed the extensive comments of Submission 38 about the draft plan and also agree with their comments.</p>		
146	19 July 2019	Email	Not support	<p>We understand that the City of South Perth intends to change the height restrictions for the buildings along the foreshore. At the time of purchase we were assured that our views would be unrestricted because of the existing height restrictions. We are very disappointed and upset by the planned changes, the more so as we paid a substantial premium for the views.</p> <p>The increased building heights will have a very negative impact on the aesthetics of the South Perth foreshore. At present a walk along</p>	Refer to Submission 1	ACP 11 & 12

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				<p>the foreshore is very pleasant, it will be much less so if there are 14 stories high buildings right alongside the foreshore.</p> <p>Remainder of submission is as per the Aurelia pro-forma submission that was distributed to Aurelia and Reva residents. Refer to Submission 1</p>		
147	8 July 2019	Email		<p>Submission is supportive of the plan generally; however, would support a reduction in podium size and setbacks from boundaries outside Mends Street.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	<p>ACP – 7</p> <p>A61 – 7, 8, 12–17, 20-28</p>
				<p>Balconies should be included, and they should at least count for 0.25 or 0.5 per square meter. (Plot Ratio)</p>	<p>Comment noted</p> <p>Tower floorplate area requirements must balance the objective to encourage slimmer towers with the objective to provide attractive and generous balconies.</p> <p>Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.</p>	
				<p>Some applications would be required to provide less than 1 car parking bay per residence. There should be at bare minimum 1 bay per unit.</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
148	18 July 2019	Feedback Form	Neither support nor not support	<p>I am currently an employee at The Peninsula Serviced Apartment. This amendment will affect my current employment.</p>	<p>The current use ‘serviced apartment’ is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p>	A61 - 6

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					It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.	
149	18 July 2019	Feedback Form		I do not support the proposed change to include above ground car bays into the plot ratio calculation. The slimmer towers and proposed building height will allow more South Perth residents to have a view.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.	-
150	20 July 2019	Feedback Form		Maintain the present building heights. No tier system. Overcrowding within a residential area.	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula. Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area. The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth. Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.	A61 - 11
151	20 July 2019	Feedback Form	Not support	No building height increases. Congestion.	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular. Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area. The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth. Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations. Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	A61 - 11
152	20 May 2019	Feedback Form	Neither Support nor Not support	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. Generally support the initiatives to improve pedestrian and cyclist amenity within the ACP area; however, am concerned that the	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. Support for pedestrian and cycling amenity upgrades is noted.	-

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				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.		
153	6 June & 22 July 2019	Feedback Forms & Email	Not support	<p><u>Email submission</u></p> <p>There have been many rounds of consultation over the past 3 years with little progress. It seems JDAP and the City just keep asking for comments and continue to push for creating a second CBD in South Perth. No changes to the building heights or setbacks - more concrete & glass the taller the better.</p> <p>According to the City and the State Government South Perth must accommodate 100% more people than surrounding suburbs as it is the next CBD. Sadly neither the residents nor visitors are interested in living or visiting another CBD.</p> <p>South Perth Peninsula Action Group pro-forma submission As per Submission 5 Response</p>	As per Submission 5 response	<p>ACP – 7, 16, 17, 18, 19, 22, 23</p> <p>A61 – 2, 7, 8, 11 – 17, 20-28</p>
154	18 July 2019	Feedback Form	Not Support	There are too many D and DC categories which defeats the ACP objectives for land use that categorizes a particular area.	A number of uses are discretionary. This provides some flexibility in approving the use, whilst also providing for control over development.	<p>ACP – 6, 7</p> <p>A61 – 2,7, 8, 12–17, 20-28</p>
				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. 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	Objectives are considered alongside development requirements including building height limits, plot ratio limits, setback requirements, design requirements and method for calculating public benefit contributions.	
				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.	Many opportunities were offered to residents and stakeholders to provide comment. A summary of engagement outcomes is available for review.	
				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.	<p>Comment noted</p> <p>A number of modifications are recommended to improve the clarity of the draft documents.</p>	
				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	The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes	

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				front gardens, residential feel of the area. The buildings and podiums should all be as one with at least the current building setbacks maintained.	<p>requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				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.	Comment noted.	
				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.	Comment noted	

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				<p>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 none 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.</p> <p>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"</p>	Unlimited heights are not proposed in the draft ACP and proposed Amendment 61.	
155	21 July 2019	Feedback Form		<p>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%.</p> <p>I agree with the tier system but not to the levels of height proposed.</p> <p>The difficulty is now sometimes getting off the peninsular at the lights through 3 rounds with the current population.</p> <p>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.</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	ACP - 17
156	25 July 2019	Feedback Form		Plot ratio should not include car parking. Too many development controls.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also encourage thinner towers.	-
				This part of the city is underdeveloped. Need to increase density, activation and amenity.	Comment noted	
				9m setback on Mill point road is too much.	Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).	

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					The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.	
				Train station Should be funded by public benefit contributions.	The City of South Perth will establish a special fund for public benefit contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP. Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
				It is too prescriptive. Traditional plot ratio and site coverage will deliver better outcome.	The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes. Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.	
157	22 July 2019	Feedback Form	Support	No additional comments	Noted	-
158	20 May 2019	Feedback Form	Not supportive of building height limits	Strongly do not support the reintroduction of height limits in areas of the ACP with Tier 2 building height/plot ratio limits. 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. The height limit on Tier 2 should be removed. Height limits are arbitrary and reactionary to the vocal minority. Building envelope requirements and plot ratio limits form natural controls for the scale of development. I strongly argue that Tier 2 should have no height limit.	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained. The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas, with areas of higher typologies generally located closer to the centre of the ACP area, and ensure appropriate interface between areas of different height types. It is not recommended to increase the building height limit for medium-high sections of the Mill Point and Richardson character areas.	-
159	16 & 18 July 2019	Feedback Form	Not support	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 under underground car parking to be treated more favourably and encouraged by council would be a good outcome for all	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers. The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options. Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.	ACP – 27, 28, 33

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				<p>Draft City of South Perth Activity Centre Plan – Public Realm Mid-Block-Link</p> <p>Plan 5 and Section 6.3.2 of the ACP describe and illustrate the need to establish (inter alia) “mid-block-links” between streets. Whilst the need for mid-block pedestrian links is considered a desirable town planning and design outcome, the process for identifying the locations and the legal mechanism for implementation requires additional thought and resolution.</p> <p>Location of Mid-Block-Link</p> <p>Submitter owns multiple, adjacent lots in the Richardson Precinct which are likely to be developed as a single site (i.e. a superlot). If provided in the location shown on Plan 5 of the ACP, the mid-block-link (MBL) will effectively divide the superlot, potentially affecting development potential and a desirable design outcome.</p> <p>The provisions relating to the MBL need to allow some flexibility about the location of the MBL to ensure it does not affect development potential and/or good design outcomes.</p>	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
160	18 July 2019	Feedback Form		<p>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.</p> <p>Substantially close walking to distance to Ferry terminal, transport node, which is advocated by the State Planning Department.</p> <p>Originally, this recommended rezoning (24.3m) was advocated by South Perth Town Planning Offices to South Perth City Council.</p>	<p>Comment noted</p> <p>Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. It is not recommended to increase the building height limit in this location.</p>	-
161	14 July 2019	Feedback Form		<p>Lots with a Medium-High building type (a possible 90m) should not be built adjacent to a lot with ‘Low’ building height typology, as proposed for the area of Esplanade north of Frasers Lane. 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.</p> <p>The proposed 1 story increase along the South Perth Esplanade north of Fraser Lane to six storeys [‘low’ height type 17m tier 1] compared to the proposed increase in building heights directly behind in Mill Pt road [Medium-High height type 90m Tier 2] to a possible 29 storeys seems wildly out of proportion and will look aesthetically disproportionate.</p> <p>There is two levels of building height limit separating them [Low-Medium] and [Medium]. Is there a reason for this?</p> <p>Surely a much higher building height level along the Esplanade [8-10 storeys] will not only look more pleasing but it will incentivise developers to build the appropriate buildings so that the Draft ACP</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas, with areas of higher typologies generally located closer to the centre of the ACP area, and ensure appropriate interface between areas of different height types.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 - 11

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				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 has little or no benefit for others.		
162	23 July 2019	Feedback Form	Support	Just get on with it - especially a South Perth train station	Comment Noted	-
163	13 July 2019	Feedback Form	Support	Strongly Support height	Comment Noted	-
164	21 July 2019	Feedback Form		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.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	-
165	14 July 2019	Feedback Form		Remove provision for entertainment facilities (Cinema, Tavern, Bar, Small Bar) across the board.	Cinema and Tavern is discretionary in Mends and Hillside Character Areas with a DC or D use; Small bar is discretionary in all Character areas with a DC or D use. This provides some flexibility in approving the use, whilst also providing for control over development.	ACP – 7 A61 – 12-17
				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.	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular. Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area. The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.	
				Podiums in Richardson should be limited to two stories.	Comment noted Podiums cannot exceed two or three storeys in height throughout the ACP area.	
166	2 July 2019	Feedback Form	Not support	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.	The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal. The base (primary) building height limit of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the base (primary) building height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.	ACP 11 & 12

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					It is not recommended to decrease the building height limit in this location. However, it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.	
				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.	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	
167	21 July 2019	Feedback Form	Support	I approve of Amendment No. 61	Comment noted	-
168		Feedback Form	Not supportive	Infill will destroy a once desirable place to live and village feel, similarly to Subiaco and Mount Lawley.	Comment noted.	-
				Current public transport is more than adequate. Increase buses and ferries as the need dictates, but do not pursue a train station, as the City does not need it. 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 at present.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				Why would anyone walk from Labouchere Rd down to the potential train station on Richardson St where the current buses are plentiful.	Comment noted.	
				The train also brings with it the opportunity for bad elements from other suburbs to become apparent within our beautiful suburb of South Perth.	Comment noted.	
				Additional height and density in general principle is supported within reason, however current height and density proposed is not supported.	Comment noted.	
				The council needs to stop listening to greedy developers. 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. 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.	Comment noted.	

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169	25 July 2019	Feedback Form	Support	More residential land use, hotel and serviced apartments.	It is recommended that Serviced Apartments and Hotel be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.	ACP – 6, 9 A61 – 11, 13-19
				Height limits should be lifted along with plot ratio increases to assist development and provide for sensible higher density outcomes. 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. It's 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.	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula. Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.	
				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.	Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.	
				P321 is not supported as the practical implications could hamper developers. Would encourage more of a combination of smaller and larger developments to provide variety.	Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area. Developments that exceed the Tier 1 height/plot ratio limit must be of exemplary design quality, which is defined in the draft ACP as “being of a standard that provides a high benchmark for design, innovation, and sustainability and is visually striking and memorable in the context of the locality”. In order to achieve this standard the applicant must undertake a competitive design process between a minimum of three suitably qualified architects that is independently assessed in accordance with the City’s South Perth Activity Centre Competitive Design Policy (P321). These requirements reflect the scale and significance of development above the Tier 1 limits.	
				Bike pathways, public access nodes, eg train station, should be funded by public benefit contributions. Developer contributions should be more flexible to allow greater diversity in design whilst still achieving public space enhancement. ie 'inkind' contributions,	The City of South Perth will establish a special fund for public benefit contributions and develop a detailed plan to guide the management and expenditure of contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP. Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
				No minimum car parking for residential development. No minimum car bays for short stay.	Comment noted	

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					<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				No paid parking in business areas	This comment is outside the scope of the draft ACP. Parking is managed in line with the City's Parking Management Plans.	
				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.	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p>	
170	25 July 2019	Feedback Form		Zoning definitions are very old. Some more thought into future proofing the area would be good.	Comment noted.	ACP – 6, 9 A61 – 11, 13-19
				Plot ratio should be the governing factor for height. Plot ratio should not include car bays.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.	
				More height to encourage more density and diversity is a great outcome. It will help small businesses and greatly improve overall liveability.	<p>Comment noted</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				Have some discretion around rear setbacks.	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p>	
				Setbacks along mill point road are too large.	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				I support the podium site cover	Comment noted	

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				<p>I do not support P321. It will create and promote only 1 product type. Would like to see it appeal to big and small developers to create an interesting mix.</p> <p>Train station. More undercover areas along the foreshore. Should be funded by public benefit contributions.</p> <p>Give developers the option to provide public benefits that integrate with both said development and streetscape in lieu of developer contributions.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				Should be no minimum car parking for residential, student accommodation or short stay. only a maximum.	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				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.	Comment noted	
				Great to see the density in the mill point precinct.	Comment noted	
171	25 July 2019	Feedback Form		Building heights and plot ratio should be increased.	<p>Comment noted</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	ACP – 9, 11, 12 A61 – 13-19
				South Perth residents and the general public will benefit from higher density which will encourage local business.	Comment noted	
				4m rear setbacks should be discretionary.	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the</p>	

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					streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.	
				I think the podium site cover percentage is more than adequate	Comment noted	
				Concerned that P321 will not help bigger investors in their decision making.	Comment noted	
				Improve ferry access and quantity to improve water transport should be funded by public benefit contributions.	Comment noted	
				Is there enough thought for future electrical vehicle charging? I would suggest supporting car sharing concessions.	Comment noted	
				No paid parking in business areas.	This comment is outside the scope of the draft ACP as it relates to an area outside of the draft ACP area. Parking is managed in line with the City's Parking Management Plans.	
				Far too many development controls is hampering progress. Plot ratio and site coverage along with building heights should be increased.	Other comments noted	
172	25 July 2019	Feedback Form		No height limits. There are too many development controls.	Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	-
				Plot ratio should not include car bays.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.	
				More height and more plot ratio opens up the area to more people and lifestyle options.	Comment noted	
				Train station. Bike paths. Should be funded by public benefit contributions.	Comment noted	
				There should be no minimum car parking for residential developments.	The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.	
173	25 July 2019	Feedback Form		Train station, bike paths, ferry focus. Should be funded by public benefit contributions.	The City of South Perth will establish a special fund for the public benefit contributions and develop a detailed plan to guide the management and expenditure of contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area,	-

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					and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP. Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
				Less restrictions on development controls		
				No height limits. Too many development controls.	The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes. Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.	
174	25 July 2019	Feedback Form		No height limits. Too many development controls.	The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes. Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.	-
				ferry focus, bike paths, train station Should be funded by public benefit contributions.	The City of South Perth will establish a special fund for the public benefit contributions and develop a detailed plan to guide the management and expenditure of contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP. Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.	
175	25 July 2019	Feedback Form		The height should be taken from the natural deemed ground level as provided by state planning policy 7.3 of the residential design codes Vol 2. It provides a balance to the area.	Amendment No. 61 measures building height from natural ground level.	ACP – 2, 27, 28, 33 A61 – 1
				The properties on the South Perth Esplanade east of the Ray Street 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 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.	It is recommended to change the boundary of the Mends character area to west of Ray Street Lane so the properties on the South Perth Esplanade east of the lane become part of Hillside. This will increase the side and rear setback requirements.	
				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	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	

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				<p>avoided except for a small group of local residents with most retail stores closing. ie. Subiaco.</p> <p>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.</p> <p>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.</p> <p>By creating a pocket park along side a block of home units it will have the effect of reducing the security of the residents</p>	<p>Mends and South Perth Esplanade will have a greater pedestrian focus providing a much more pedestrian friendly environment reflecting the anticipated movement of pedestrians.</p> <p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
176	20 July 2019	Feedback Form	Not support	<p>The draft scheme is planning for an <u>additional ~4500 dwellings</u> 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.</p> <p>The increased density is NOT based on relevant evidence and the population forecasts are unsupportable by critical 'independent' examination.</p> <p>The large population increase that will change the demographic considerably contradicts the population forecasts and its all been done without a current 'Housing Needs Analysis'</p> <p>The Planners are aiming to increase density to “the maximum possible” WHY?</p> <p>Many independent planners agree that the future density should be calculated according to what is optimum for this unique area.</p>	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City’s vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	ACP – 7, 18, 19, 22 A61 – 7, 8, 11–17, 20-28
				<p>The public open space has included the <u>ZOO</u> (which is not freely open to the public) but including it allows for a density approaching 50 - which is equal to a CBD.</p>	<p>The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.</p>	
				<p>There are still large <u>podiums</u> allowed for residential areas and heights allowed for buildings that are not appropriate, sensible or needed.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of</p>	

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					<p>existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				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.	Comment noted	
				There is no current, complete and <u>cumulative traffic model</u> that includes the ~4500 new dwellings that are proposed?	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years. It concludes that, overall, the street network in the ACP area performs well under recommended growth scenarios and its configuration supports existing and future development as well as use by all transport modes.</p> <p>However, traffic forecasts show that the 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 is 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.</p>	
				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.	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	
				<p>There is no environmental impact study on Perth Zoo nor the current residents from the planned built form.</p> <p>How can we assess the impact on our neighbourhood if we are not shown accurate numbers, simulations or models?</p>	<p>Properties immediately adjacent to Perth Zoo on Labouchere Road cannot be taller than approximately 17 storeys (the Pinnacles building is 20 storeys). In addition, the impact of shadow on the Zoo has been taken into consideration and each development will be assessed on its merits.</p>	

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					It is reasonable to include specific provisions in Amendment No. 61 that ensure the Zoo is protected from overshadowing. A modification to the ACP is recommended to add an objective and requirement to limit overshadowing of the Zoo.	
				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?	<p>Section 3.1.4 of the draft ACP states that the provisions are to provide for growth in local services and employment opportunities. The provisions only relate to Mends and Richardson Character areas and combine with preferred uses at ground level to provide activation.</p> <p>There is opportunity to consider provisions to allow the development of some floors to convert at a later stage to alternative non-residential or residential uses. This could be mechanisms such as minimum floor heights for areas that would otherwise be required to be committed to commercial requirements.</p>	
				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.	<p>A comprehensive demographic and economic analysis of the South Perth Activity Centre (Appendix 1- Economic and Demographic Assessment) was undertaken to inform the draft ACP and proposed Amendment No. 61. This analysis recommends that the ACP area should grow to support:</p> <ul style="list-style-type: none"> • The retail and other commercial services that the centre provides • State government policy to accommodate residential growth in the inner city as greater Perth grows • Demand for inner city living in a highly desirable location. <p>The potential future growth in residential dwellings and population, retail and commercial services, employment and tourism (population and activity growth) have been analysed and modelled to the year 2041, which is 25 years from the latest Census conducted in 2016. This timeframe allows growth to be planned for in line with State Government strategic planning and the City's vision for the area.</p> <p>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.</p> <p>The results of this analysis are set out in Part 2 and Appendix 1 of the ACP).</p>	
				<p>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.</p> <p>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</p>	<p>Comment noted.</p> <p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment</p>	

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				<p>adding thousands of additional residents all competing for the same roads, public space and entertainment.</p> <p>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.</p> <p>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.</p>	<p>of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
177	18 July 2019	Feedback Form	Support	<p>Have taken everything into account, great forward thinking.</p> <p>It is great to see some futuristic thinking toward planning. The more people that can live close to the city cutting traffic etc the better. Definitely in favour of Amendment no 61.</p>	Comments noted	-
178	18 July 2019	Feedback Form	Support	<p>More availability for more people.</p> <p>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.</p>	Comments noted	-
179	21 July 2019	Feedback Forms	Support	I do not understand why the obvious heritage precinct focussed on the crossroad 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.	The town planning scheme refers to heritage properties. Extra protection is also given through section 8.2 of the draft ACP which may require a heritage impact assessment.	ACP – 14, 15, 19, 22, 23
				I do not have a 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.	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				There should be more secure bicycle parking so that lycra groups don't block the pavement.	Section 5.3 of the draft ACP sets out objectives and guidance for pedestrian and cyclist infrastructure.	
				Pedestrian safety at the intersection of Labouchere Road and Mill Point Road should be improved.	Comment noted. Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				I like "pocket parks" and would like to see some help in making these community gardens with vegetables and fruit	Comment noted	

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				<p>I would like more regulation in dealing with a rising water table and the aquifer that underlies the Mends Street area.</p> <p>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.</p>	<p>The Department of Water and Environmental Regulation request a condition be place on all developments that reflects that the proposed development has adequate flood protection from a 1 in 100 (1%) Annual Exceedance Probability (AEP) flood.</p> <p>The suggestion that the developments have adequate flood protection can be accommodated by placing a standard condition on the development approval by the approving authority. The impact on the floodplain can be considered as part of the stormwater management plans.</p>	
				I don't object to towers if the planning maximises privacy and there is public space between buildings.	Comment noted	
180	22 July 2019	Feedback Form		Extension of the ACP area boundary is generally supported so that the precinct can be assessed holistically.	Comment noted	ACP – 4, 5, 6, 7, 11, 12 A61 – 2, 3, 7, 8, 9, 10–17, 20-28
				The new Hillside Precinct has a positive implication for developers and stakeholders without much negative impact on existing development.	Comment noted	
				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.	<p>Section 3.1.4 of the draft ACP states that the provisions are to provide for growth in local services and employment opportunities. The provisions only relate to Mends and Richardson Character areas and combine with preferred uses at ground level to provide activation.</p> <p>There is opportunity to consider provisions to allow the development of some floors to convert at a later stage to alternative non-residential or residential uses. This could be mechanisms such as minimum floor heights for areas that would otherwise be required to be committed to commercial requirements.</p>	
				Provision 3 of Amendment 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.	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.</p> <p>The exclusion of car parking in plot ratio for the purposes of calculating commercial floor space plot ratio is considered appropriate, as carparking is not contributing directly to land use yield on the site (and financial return).</p>	
				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, don't believe this is significant enough to respect the existing situation.	<p>Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	
				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.	<p>Comment noted</p> <p>It is recommended to add an additional clause to clarify where different typologies apply across single sites.</p>	

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				<p>Believe it unreasonable for any site currently with the Amendment 46 Special Design Area not to be included within the highest building height limit with Tier 2 potential.</p> <p>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.</p> <p>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.</p>	<p>Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP.</p> <p>Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas and ensure appropriate interface between areas of different height types. It is not recommended to increase the building height limit for medium-high sections of the Mill Point and Richardson character areas.</p>	
				<p>Amendment 61 provisions allow for more 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.</p> <p>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.</p>	<p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p>	
				<p>Amendment 61 suggests some small scale commercial for Mill Point and Hillside where 'appropriate' however such onerous street setbacks make commercial tenancies mostly unviable.</p> <p>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.</p>	<p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>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.</p>	<p>Comment noted</p>	
				<p>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 Amendment 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</p>	<p>The indicative number of storeys is calculated as 4.5m for first storey and 3.3m for all subsequent storeys.</p>	

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				<p>services, inhibited by the maximum heights of 11.1m (3 storey) and 7.8m (2 storey).</p> <p>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 (2,000sqm) is around 60% after all podium setbacks are accounted for.</p> <p>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.</p> <p>The principal for taller and slender towers is supported and has been an ongoing concept central to our recent Development Applications within the precinct.</p> <p>On review, it is apparent that tower footprints become very inefficient on sites smaller than 1,800sqm when additional building heights are sought.</p> <p>Development Applications seeking additional height on sites smaller than 1,200sqm 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p></p> <p>The site coverage and podium setbacks combine with other design guidelines to ensure there is some consideration in the bulk and impact of a building. The guidelines describe a maximum coverage for podiums and tower floorplates. In some cases setbacks may limit podium size more than site cover limits.</p> <p>Tower floorplate area requirements must balance the objective to encourage slimmer towers with the objective to provide attractive and generous balconies.</p> <p>The suggestion to introduce a system where tower floor plate limits reduce incrementally as building height increases may have merit. However, there is no evidence that the tiered system proposed in the ACP and Amendment No. 61 will create a lack of diversity of building heights. It is expected that building height on each site will be determined by the interaction of the different development requirements and that the optimal outcome will vary from site to site.</p> <p>Ongoing monitoring of the documents will be undertaken to assess if this concern is realised. Section 9 of Part 1 of the ACP sets out requirements for monitoring and review of the ACP.</p> <p>Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.</p> <p>Comment noted</p> <p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p>	

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				<p>It's only considered reasonable to conduct design competitions on large public sites. Imposing competitions to this extent for private enterprise 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.</p>	<p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design competition for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p>	
				<p>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.</p> <p>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.</p> <p>The City should be commended for its efforts to improve pedestrian safety and amenity.</p> <p>Support the construction of a new South Perth Train Station and expansion of the Ferry Service.</p> <p>Considering its location, South Perth can lead the way with reduced car dependence and a model shift to more sustainable transport options.</p>	<p>Comments noted</p> <p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>Built form is being controlled by height, setbacks, podium and tower site coverage and plot ratio. Too many controls will hinder innovation and creativity.</p> <p>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.</p>	<p>Comment noted</p> <p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p>	
				<p>Amendment 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</p>	<p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.</p>	

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				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.	<p>Minimum non-residential plot ratio requirements have been established to ensure suitable floor space will be available in the ACP area for employment generating land uses to support the economic growth of the activity centre.</p> <p>Section 3.1.4 of the ACP states that the provisions are to provide for growth in local services and employment opportunities. The development requirements only apply in the Mends and Richardson Character areas and combine with preferred uses at ground level to support the development of these areas with a mix of land uses.</p> <p>Notwithstanding, there may be practical reasons why development could be constrained by these requirements, based on demand for commercial floor space. This may either prevent development or result in vacant ground floor frontages.</p> <p>It is recommended to modify development requirement 3.1.4 of the ACP to allow for development to provide commercial grade minimum floor to ceiling heights for the percentage of the development that would otherwise be required to be commercial, so that this area can be converted to commercial at a later date.</p> <p>Development requirement 3.1.4 does not prevent development of sites with 100 percent non-residential floor space.</p>	
				The 12% of site area for deep soil zone required in the ACP will reduce the efficient of basement car parking design which encourages carpark to be included in podium or reduce development potential.	<p>Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3.</p> <p>The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping.</p> <p>Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.</p>	
				<p>All sites previously within the Amendment 46 Special Design Area should be included within the highest building height limit with Tier 2 potential.</p> <p>There should be no height caps for sites within the ‘Tier 2’ boundary. Building heights will be determined by the plot ratio controls.</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas, with areas of higher typologies generally located closer to the centre of the ACP area, and ensure appropriate interface between areas of different height types. It is not recommended to increase the building height limit for medium-high sections of the Mill Point and Richardson character areas.</p>	
				There are too many planning controls that will inhibit innovative and diverse designs.	The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.	

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				<p>Building height provisions should refer to number of storeys only. This allows greater flexibility in design and higher apartment ceilings.</p>	<p>The advantage of measuring height in storeys is that it is easy to interpret and provides incentive for developers to provide greater floor-to-ceiling heights. However measuring heights in metres provides greater certainty regarding the permissible height of buildings.</p> <p>The ACP sets minimum floor to ceiling heights and requires high standards of architectural design. These requirements combine to encourage generous floor to ceiling heights as a component of high amenity apartments.</p> <p>It is recommended that height limits remain in metres to provide certainty regarding building heights; however it is also recommended that a table and explanatory note be added to section 4.1.1 of Part 1 of the ACP to explain the approximate number of storeys that may be possible for each height typology.</p>	
				<p>Building heights are inconsistently mapped along The Esplanade. Medium-high zoning is not appropriate to achieve a reasonable tiering.</p> <p>We don't believe it's reasonable to relax building height limits from Amendment 46 along the South Perth Esplanade.</p>	<p>See comments re Tier 2 above.</p>	
181	18 July 2019	Feedback Form		<p>Whilst acknowledging the need for increase in heights, I wish to promote one minor change which would have a dramatic Town Planning effect.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Both conditions would result in a sensitive integration of new heights with the existing.</p> <p>You don't need building height discretion to determine good architecture.</p> <p>The obvious contradiction in the document is the desire for certainty 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.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	A61 - 11

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182	22 July 2019	Feedback Form		<p>Same as submission 43</p> <p><u>Serviced Apartments</u> should be allowed across all precincts.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Greater flexibility as outlined above.</p> <p>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.</p> <p>A train station should be funded with public benefit contributions.</p> <p>Happy with proposed system.</p> <p>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.</p> <p>If some of these benefits are provided by private developers, they should be valued and deducted as a public benefit cost.</p> <p>I also suggest car bays partially below ground should also be excluded.</p> <p>Part 1 has many areas requiring improvement.</p> <p>Building Height should be expressed as stories and not meters. Meters encourages lower floor to floor heights which diminishes design quality.</p>	Refer to Submission 43	<p>ACP – 5, 6, 7, 9, 11, 12, 19, 22, 23, 27, 27, 28</p> <p>A61 – 2, 3, 7, 8, 12-28</p>

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				<p>The setback provisions, particularly for podiums have not been tested and are problematic. Podium and tower setbacks require more work.</p> <p>Do not support some of the rationale in relation to building height and setbacks.</p> <p>General intent with more granular requirements is supported.</p> <p>Controls are too onerous and should be simplified.</p> <p>More testing and professional feedback required.</p> <p>Surprised at the increased special design area. This increase could be allowed for in a future scheme.</p> <p>Policy P321 is unfair and an unreasonable imposition on the private sector.</p> <p>Design quality should be determined by a DRP. This policy requires developers to hand over their IP which may or may not be effectively duplicated. Entirely unfair, resulting in poor development outcomes.</p>		
183	19 June 2019	Feedback Form		<p>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.</p>	Comments Noted	-
184	18 July 2019	Feedback Form		<p>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</p> <p>However I do not support the proposed Plot Ratio calculation which now define residential car bays in the Plot Patio calculation, unless they are they are wholly underground.</p> <p>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.</p>	<p>Comment Noted</p> <p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.</p>	ACP – 27, 28, 33
				<p>Strongly oppose the concept of mid-block links.</p> <p>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.</p> <p>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</p>	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	

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				<p>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</p> <p>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.</p> <p>Function as an extension of the public realm with no gates or other obstructions which create visual or physical separation.</p> <p>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.</p> <p>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.</p> <p>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?</p> <p>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.</p> <p>Also by having these links acts as an obstruction to different owners combining their land holdings together to form a larger piece of land in which to develop.</p> <p>Strongly oppose privately owned public spaces. It doesn't 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 for by the developer/owner.</p>		
185	15 May 2019	Feedback Form	Neither support nor not support	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.	This comment is outside the scope of the draft ACP as it relates to an area outside of the draft ACP area. Parking is managed in line with the City's Parking Management Plans.	-
186	18 July 2019	Feedback Form		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, multiple dwellings, mixed use.	Comment noted	A61 – 11, 15
				Consideration of setbacks to boundaries in relation to plot ratio and heights. Allowance for higher limits along main traffic routes and	Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of	

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				spacing of buildings could impact traffic, wind effects, pedestrian amenity, access to sunlight, effect on the zoo.	existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future). Some changes are recommended to setbacks to address concerns raised in submissions relating to specific locations.	
				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	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				Building heights/plot 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.	Comment noted Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.	
				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.	Comment noted	
				Would be good to require the developments that have lower setback requirements and greater height limits to contribute more to improve the environment.	Comment noted	
187	22 July 2019	Feedback Form		As per Submission 43	As per Submission 43	ACP – 5, 6, 7, 9, 11, 12, 19, 22, 23, 27, 27, 28 A61 – 2, 3, 7, 8, 12-28
188	22 July 2019	Feedback Form		Suggest installing fence or bollard to protect pedestrian and businesses along Harper Terrace and Mill Point Road. Vehicles are driving in a high speed from the freeway and therefore it would be great to implement any plans to protect pedestrian movement. 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.	Comment noted This comment is outside the scope of the draft ACP. Parking is managed in line with the City's Parking Management Plans.	-
189	23 July 2019	Feedback Form	Support	Height should be deemed from ground level 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.	Amendment No. 61 measures building height from natural ground level. This is a well-established basis for measuring building height. The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site. It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are	ACP – 2, 7 A61 – 1, 12-17

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					<p>recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p> <p>The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres.</p>	
190	22 July 2019	Feedback Form		Generally support but not to building height caps should be enforced	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	-
191	7 July 2019	Feedback Form	Support	<p>Suggest to increase 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 Plan area by 2041.</p> <p>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.</p>	<p>Comment noted</p> <p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p>	-
192	18 July 2019	Feedback Form	support	I support the proposed building heights be taken from existing ground levels (and not from the current planning scheme to be from 2.3m AHD).	Amendment No. 61 measures building height from natural ground level.	-
193	20 June 2019	Feedback Form	Not support	Resident of a north-facing property in Pinnacle building which was purchased on the understanding that views would not be blocked out by buildings of a higher level.	Comment noted.	ACP – 11, 12
194	20 July 2019	Feedback Form	Support	<p>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.</p> <p>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.</p>	<p>Land uses highlighted are DC use in Mends a x use elsewhere. A motor vehicle car wash can be provided in a carpark or similar location without impact on adjoining amenity and can be considered a service use for the area. The design guidelines will help to control the impact on residence and pedestrian amenity.</p> <p>Parking stations will also need to comply with other design guidelines. Combined with Section 5 of the draft ACP the emphasis is on supporting and improving infrastructure for other sustainable modes of transport including public transport.</p>	ACP – 27, 28, 33 A61 – 11, 14-19
				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	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	

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				<p>train stations /Yagan Square bus station, which afford greater choice and convenience for on-journey connections.</p> <p>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 that the bus services.</p>		
				<p>For that reason, large scale developments should also be focussed along Mill Point Rd and Labouchere Rd.</p> <ul style="list-style-type: none"> 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. <p>The tiered system should encourage developers/designers to deliver higher quality and more innovative/creative outcomes.</p> <p>Flexibility and incentives should be guided by clear performance objectives (refer to the answer to Q4 above).</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>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.</p>	<p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p>	

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					It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.	
				<p>The street-level interest/activation and the human scale is so much more important than the height of the building.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.</p>	
				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area.</p> <p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Tower setback requirements must balance the objective to provide attractive and generous balconies with the objective to ensure adequate separation between buildings.</p>	

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				<p>access, cross ventilation and privacy for residents and works towards maintaining view corridors.</p> <p>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), 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.</p> <p>The Hillside provisions should be the same as Mill Point.</p> <ul style="list-style-type: none"> Consideration should be given to other uses and activities within proposed developments that provide public benefit, such as: <ul style="list-style-type: none"> 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 accessibly 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 	<p>Comment noted.</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>'The Scheme and Policy should provide guidance on car parking concessions when a development proposes to implement:</p> <ul style="list-style-type: none"> - car/scooter/bike sharing schemes - commercial car parking bays allocated for residential/visitor use after hours and on weekend <p>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.</p> <p>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.</p> <p>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</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>Detailed design for road treatments and upgrade to public transport services will be undertaken later in conjunction with Main Roads WA, PTA and Department of Transport.</p>	

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				<p>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.</p> <p>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.</p> <p>I would not support any 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.</p> <p>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.</p> <p>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.</p> <p>"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.</p> <p>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.</p> <p>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.</p>		
				<p>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 with the residents within the Hillside precinct.</p> <p>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.</p> <ul style="list-style-type: none"> 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) 	<p>Comment Noted</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	

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				<ul style="list-style-type: none"> overlooking the freeway (this is not a pleasant area due to weather exposure in winter and road traffic/rail noise all year) <p>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.</p>		
				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.	<p>Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces.</p> <p>Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.</p>	
195	23 July 2019	Feedback Form		No additional comment		-
196	15 July 2019	Feedback Form		<p>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 the sewer line. This will affect our neighbours at Darley Heights and Goldman apartments.</p> <p>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.</p> <p>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.</p>	<p>There is a mapping error at the rear of the residential properties on South Perth Esplanade to the East of Mends Street that was identified during the public consultation period. This will be rectified in the final version of Amendment No. 61.</p> <p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p>	A61 - 11
197	21 July 2019	Feedback Form		With reservations regarding plot ratio as car bays are defined in the calculations ground water will be displaced.	In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.	ACP – 27, 28, 33
				All heights are to be measured from Natural Ground Level.	Amendment No. 61 measures building height from natural ground level.	

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				Do not support the very early selection of Mid Block Links and Pocket Park placement as there must be flexibility.	Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
198	5 June 2019	Feedback Form	Not supportive	Podiums are not needed in South Perth. Just like Connect South they will be a disaster for the outlook and mobility in the area.	The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site. Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand. Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.	ACP – 7 A61 – 11-17
				All setbacks should be a minimum of 4m.	Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).	
				The floor plate should be no larger than the tower itself. 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.	Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular. Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area. The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.	

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					Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.	
				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.	Connect South is currently under construction and is outside the scope of the draft ACP and proposed Amendment No. 61.	
				The plan should include a compensation plan for residents who are having the activity centre forced 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.	There is no mechanism to provide a compensation plan for residents and the draft ACP and Amendment No. 61 have been prepared in accordance with the relevant regulations and other requirements.	
				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.	Comment noted	
				Residents should be free to decide if they want to have a car or not and the plan should include road infrastructure in the event people exercise their right to own and operate a car.	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>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.</p> <p>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.</p> <p>Very general document with lots of words designed to give no hard facts or plans.</p> <p>The intentional destruction of property values undertaken by the South Perth City Council in the precinct has not been addressed. The</p>	<p>Section 6 of Part 1 of the draft ACP provides guidance for improvements in the public realm. The plan aims to create an integrated public open space network that supports activity and connects local and regional destinations.</p> <p>Other comments noted</p>	

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				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.		
199	16 July 2019	Feedback Form		<p>25 story should be max height. Size of apartments no less than 80 sqm for one bed. Infill requirement can accommodate this.</p> <p>Plot ratio requirement should include ground level amenities for any building above 10 floors. Eg cafe restaurant or any commercial space.</p> <p>Building height limits are too 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.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	ACP – 7 A61 –12–17
				The traffic control will be non existent.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	
				<p>PODIUM LEVELS SHOULD START FROM 2ND LEVEL (EXCEPT FOR THE ENTRANCE) WITH A RAMP LEADING TO 2ND LEVEL.</p> <p>LEAVING GROUND FLOOR LEVEL FOR COMPULSORY COMMERCIAL ACTIVITY SUCH AS RESTAURANTS CAFES AND OTHER FORM OF PUBLIC USEFUL AMENITIES. WHATS THE POINT OF HAVING ALL THOSE RESIDENTS IF THEY GO TO OTHER AREAS TO SHOP OR EAT.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p> <p>Street interface and commercial floorspace requirements are set out in the ACP.</p>	
200	25 July 2019	Feedback Form	Not support	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 the draft does not show this diversification of land use requirements.	Comment noted	ACP – 2 A61 - 1

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				<p>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.</p> <p>I have no problem for commercial lots having the 0 setbacks both sides and rear.</p>	The residential properties on South Perth Esplanade to the East of Mends Street are recommended to be included in the Hillside character area. This will add a requirement for side and rear setbacks to be at least 4 metres.	
201	27 May 2019	Feedback Form	Not support	<p>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?</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The draft ACP part 1 section 5 provides guidance for improvements to the movement network in support of the ACP vision, including public transport improvements.</p> <p>Parking management details are outside the scope of the draft ACP. Parking is managed in line with the City's Parking Management Plans.</p>	-
202	15 July 2019	Feedback Form		<p>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.</p> <p>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.</p>	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p> <p>The presence of the sewer line and the steepness of the slope at the rear of properties on South Perth Esplanade East of Mends Street make it very difficult to develop on that part of the lot south of the sewer line.</p>	-

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203	17 July 2019	Feedback Form		<p>A preference for a good degree of diversity in building heights and shapes.</p> <p>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/tearoom 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.</p> <p>I feel that the City is not doing enough to promote and assist the progressing of the South Perth Railway Station.</p> <p>The City could become active in funding pedestrian overpasses at the busiest location (Labouchere Rd near Zoo entrance).</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	-
204	21 July 2019	Feedback Form		<p>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.</p> <p>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?)</p>	<p>The Richardson character area is envisaged to include a mix of land uses to provide for growth in local services and employment opportunities. The preferred uses at ground level to support the development of these areas with a mix of land uses.</p>	ACP - 17
				<p>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?)</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>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.</p> <p>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</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p>	

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				<p>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 top up contributions.</p> <p>Not sure wording is correct at Obj 5 "legible"?</p>		
205	9 July 2019	Feedback Form	Not support	<p>Leave "Mends" at "LOW" and not allow it to be built to "medium". Mends should not able to be built up</p>	As per Submission 1 Response	ACP 11 & 12
206	9 July 2019	Feedback Form	Not support	<p>The height limit proposed should revert to the original 17.5m maximum for all lots fronting the esplanade. This is especially required where the council have approved the higher levels from Fraser Lane to Mends Street.</p> <p>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.</p>	As per Submission 1 Response	ACP 11 & 12
207	16 July 2019	Feedback Form	Support	<p>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.</p> <p>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.</p>	<p>The current use 'serviced apartment' is protected as a non-conforming use whilst the existing buildings are in situ. However, there could be confusion as to the validity of the land use if the site is redeveloped in the future.</p> <p>It is recommended that Serviced Apartments be included as a DC use in the Mill Point character area. This would provide for some flexibility in approving the use, whilst also providing for control over development.</p> <p>The medium-high sections of the Mill Point and Richardson character areas help to establish the desired future scale of these areas and ensure appropriate interface between areas of different height types. It is not recommended to increase the building height limit for medium-high sections of the Mill Point character area.</p>	A61 - 6
208	14 May 2019	Feedback Form	Neither support nor not support	Bike and pedestrian pathways need to be separate for safety.	The Movement & Access Plan (draft ACP Plan 4, page 50) recommends improvements to cycle paths and footpaths along Labouchere Road and Mill Point Road. A regional principle shared path is also recommended alongside South Perth Esplanade and Melville Parade. Section 5.3 of the draft ACP sets out objectives and guidance for pedestrian and cyclist infrastructure.	-
209	18 July 2019	Feedback Form		Living on the Mill Point Road peninsula I have noticed a considerable increase in speeding traffic since the current tower-building phase	Comments noted	-

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				<p>began. Also, the number of enormous, articulated trucks that use MPR is frightening.</p> <p>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.</p> <p>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.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>Detailed design for road treatments and upgrade to public transport services will be undertaken later in conjunction with Main Roads WA, PTA and Department of Transport.</p>	
210	6 July 2019	Feedback Form	Neither Support nor Not Support	<p>Entertainment Noise</p> <p>It is essential that the South Perth Activity Centre 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.</p>	Comments noted	ACP – 17, 19, 21, 22, 23
				<p>Overshadowing</p> <ul style="list-style-type: none"> It is essential that the South Perth Activity Centre Plan be amended to state that a number of simulations be assessed to determine the effect on natural daylight and sunlight received. These include: <ul style="list-style-type: none"> Obstruction Angle Test (ensures that internal daylight levels are maintained for surrounding properties) Vertical Sky Component (ensures that surrounding property windows receive a minimum of 30% or greater of natural daylight into the room) No Skyline / Daylight Distribution within each room Annual Probable Sunlight Hours Received Overshadowing to any neighbouring gardens or other open spaces <p>The draft Activity Plan grossly under-estimates the sun light requirements for neighbouring properties. For example, the “Obstruction Angle 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.</p> <p>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</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	

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				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		
				<p>Sustainability</p> <p>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”.</p>	<p>The six star rating in the BCA refers to an energy rating such as NatHERS. Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which represents Australian best practice. Buildings seeking additional height are likely to consider higher ratings to meet other design outcomes and demonstrate design excellence.</p> <p>The Green Star rating system includes many aspects of sustainable development, of which energy is only one.</p>	
				<p>Deep Soil Zones</p> <p>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.</p>	<p>Landscaping and deep soil areas are essential to the development of the area in line with the ACP vision and character area objectives. The ACP therefore requires slightly more deep soil area than would be required under State Planning Policy 7.3.</p> <p>The draft ACP recognises the importance of areas of native vegetation, green space and foreshore areas. There are guidelines for setbacks and deep soil zones to promote retention and protection of existing trees and planting of new trees and landscaping.</p> <p>Street, side and rear setbacks provide opportunity for deep soil zones and landscaping. These also provide opportunity to protect existing trees or replace trees that may need to be removed through development.</p>	
				<p>Groundwater Management</p> <p>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 Centre Plan should also state that “Any de-watering proposals will be subject to the Department of Water & Environmental Regulation consideration”.</p> <p>Stormwater Management</p> <p>The ACP will require the City of South Perth ratepayers to fund upgrades to the City’s existing storm water drainage network. It is requested that the City only permit developers to connect to the stormwater system, in the following circumstances:</p> <p>a) all on-site stormwater retention options have been investigated and exhausted;</p> <p>b) only developments in areas where the natural soil is deemed unsuitable for on-site disposal via a 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.</p>	<p>The ACP requires a management plan to be submitted in support of development applications for technical aspects such as dewatering (where basements are proposed) and stormwater management. The building licence and engineering processes involved in certification of buildings prior to construction takes into account the soil conditions and other relevant considerations.</p> <p>Section 4.3.4 of the draft ACP recognises groundwater constraints and requires a dewatering plan and a stormwater management plan for all relevant development applications.</p>	

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				<p>Servicing Design 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.</p>	Comment noted.	
				<p>Signalised Intersections 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.</p> <p>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:</p> <ul style="list-style-type: none"> • 37 percent reduction in overall collisions • 75 percent reduction in injury collisions • 90 percent reduction in fatality collisions • 40 percent reduction in pedestrian collisions <p>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.</p>	<p>See Main Roads WA directions on roundabouts.</p> <p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p>	
				<p>South Perth Train Station It is recommended that the new train station for South Perth should be integrated into the basement of the “Landmark Site” which is located between Mill Point Rd/ Labouchere/ 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 Labouchere road to Preston Street and reconnecting onto the freeway.</p> <p>The draft Activity Centre Plan 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.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p> <p>Space has been set aside within the Freeway reserve for the future construction of the South Perth Rail Station.</p> <p>Realignment of the rail line is outside the scope of this plan.</p>	
				<p>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</p>	<p>The vision for the Richardson character area is for a variety of lot sizes and building heights to be developed to higher density overall in order to take advantage of the high accessibility of the area and to support development of the South Perth train station. In</p>	

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				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 Labouchere Road/ Charles Street, which has been built to the property line and is completely out of character for the area, and overshadows the Perth Zoo, no vegetation or landscaping buffer has been provided in the front of the building, whereas other developments have a landscape buffer.	<p>order to achieve this, it is necessary to encourage the amalgamation of lots to form larger development sites, while also allowing smaller buildings to be developed on smaller sites.</p> <p>Amendment No. 61 provides for discretion to reduce side setbacks where it can be demonstrated that the lesser setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity. It is recommended that this discretion be added to the rear setback requirements to give greater flexibility for the location of the base of buildings.</p> <p>The side and rear setback requirements are necessary to manage development on larger lots to protect the character and amenity of the area. At the same time, it is important to provide sufficient flexibility to allow smaller sites to develop where appropriate.</p> <p>It is not recommended to reduce street setbacks in the Richardson character area, as street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Any new development application submitted after the finalisation of the ACP will be expected to address the requirements of the draft ACP. The document must be given due regard.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p>	
211	8 July 2019	Feedback Form	Not support	<p>Not supportive of heights above 18 floors.</p> <p>Skyscrapers are not appropriate in South Perth and are detrimental to those who purchased at a premium in good faith.</p>	Comment noted	ACP – 11, 12
212	16 July 2019	Feedback Form	Support	<p>I see an opportunity for developers to build skinny oblong views to maximise the windows facing these 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 improve outlook from building and improve natural light.</p> <p>I think this will be a significant architectural feature of the area which will stand the test of time.</p>	<p>It is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p> <p>It is not recommended to introduce a specific ratio of width and length, or similar quantitative requirement, to address this matter as there is variation in lot size, shape and orientation across the ACP area. It is therefore more effective to set a performance-based requirement that allows for appropriate solutions to be designed and assessed.</p>	ACP – 8, 11, 12, 27, 28, 33
				<p>The variation in the setback is significant. I would like to see more uniformity across the area.</p> <p>Additionally, I would like to see requirements for gardens in the setback or opportunity to reduce the setback if green areas are optimised.</p>	<p>Setback requirements have been developed to reflect the existing and desired future characteristics of each street and character area. Street setbacks are particularly important as they have a large influence on the streetscape and public realm. The street setbacks in Amendment No. 61 have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p>	

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					The proposed street setbacks aim to provide a balance between suitable activation at the street level and a generous sidewalk and street environment enabling adequate tree planting, landscaping and street furniture integration.	
				I believe the ACP 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-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
				I really like the tiered and towers concept.	Comment Noted	
213	20 July 2019	Feedback Form		<p>1i. State quite clearly what the 'desired characteristics' are and who makes such decisions. Developers? Residents? Who has input into these 'desired characteristics'</p> <p>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.</p> <p>iii. Support - where is the large supermarket for South Perth ie Coles or Woolworths?</p> <p>iv. Explain in plain English. It sounds like a plan to overdevelop some areas. Explain what is meant by 'places of distinction and community value'. Cannot support this objective until such terms are explained.</p> <p>v. Cannot support because of the vague, undefined terms used. What is meant by 'uses'</p>	<p>Feedback has indicated that there is some confusion in the reading of the documents. Modifications are recommended to improve clarity.</p> <p>Shop is a permitted use in Mends and Richardson, which would allow for a supermarket in these areas.</p>	ACP – 6, 7, 11, 12, 17 A61 – 7, 8, 11–17, 20-28
				<p>Unravelling Schedule 9B 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.</p> <p>This document, along with all the others, should be written so that it can be understood.</p> <p>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.</p> <p>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</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	

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				<p>the real effect of the proposed changes to height/plot ratio in the Amendment and, consequently, to the street scape and liveability of the area.</p> <p>The requirements for building height and plot ratio in Schedule 9B of the proposed Amendment should remain as they are with little or no 'wiggle' room for developers to 'play the system'.</p>	<p>The advantage of measuring height in storeys is that it is easy to interpret and provides incentive for developers to provide greater floor-to-ceiling heights. However measuring heights in metres provides greater certainty regarding the permissible height of buildings.</p> <p>The ACP sets minimum floor to ceiling heights and requires high standards of architectural design. These requirements combine to encourage generous floor to ceiling heights as a component of high amenity apartments.</p> <p>It is recommended that height limits remain in metres to provide certainty regarding building heights; however it is also recommended that a table and explanatory note be added to section 4.1.1 of Part 1 of the ACP to explain the approximate number of storeys that may be possible for each height typology.</p>	
				<p>The Peninsula is a relatively fragile environment that needs 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 the 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.</p> <p>Some Council documents refer to the 'Village' or 'Community' aspect of South Perth. This plan has the potential to destroy that forever.</p> <p>Obj ii The Peninsula is a character area and Amendment 61 will destroy that character - one of tree lined streets with human scale buildings</p> <p>Obj iii How can Mends St/Peninsula area ever be an 'inner city activity centre' . What do you mean?.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>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.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	

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				<p>South Perth should be celebrated for what it is and capitalise on being 'The Left Bank' area and quite different from the City atmosphere.</p> <p>2.i Do not support the plot ratio in Draft ACP It is to be hoped that the Council/Planners will always control the amount of development.</p> <p>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.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p>	
				<p>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.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				<p>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.</p> <p>Obj iii Do not support Towers at all. I have little confidence that this objective will be realised.</p> <p>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.</p> <p>Tower floorplate areas should be reduced as a result of a whole 'rethink' of Towers.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsular.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	

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				<p>It would have been very helpful to have had all the data expressed in plain English rather than in planner jargon.</p> <p>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.</p>		
				<p>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.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Civic Heart is designated as a Landmark Site and is therefore subject to a different set of requirements (Schedule 13 of Town Planning Scheme No. 6).</p>	
				<p>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.</p>	<p>It is recommended to modify the overshadowing requirement in the ACP (development requirement 4.3.3.4) to restrict overshadowing of any lot (not just adjoining lots) and ensure that building form and orientation minimises overshadowing of the habitable rooms, open space and solar collectors of neighbouring properties on 21 June.</p> <p>Notwithstanding, it must be acknowledged that larger buildings will cause some overshadowing impacts on neighbouring properties and it may not be possible to eliminate the cumulative effects of overshadowing in all cases.</p>	
				<p>Design quality should include greening/plantings. It should not include towers and be in line/sympathy with current height limits.</p> <p>Do not actually support Public Benefit Contribution as it sounds rather like an option to 'buy' exceptions to the rules.</p> <p>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.</p> <p>Obj ii Do not support, in any way, approval of additional height and/or plot ratio. This is wide open to manipulation and abuse.</p> <p>Obj iii Delete all mention of Additional Development Potential.</p> <p>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.</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p>	

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				<p>2. What is meant by 'Placemaking initiatives'?</p> <p>3. Public Benefit Contribution sounds like 'buying' exceptions to the rules/limits etc</p> <p>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.</p> <p>Who decides what constitutes 'exemplary design'. Decisions over Civic Heart design do not give confidence in decision making.</p> <p>Everything needs to be expressed in plain English and all requirements enforced. There should be no room for manipulation of the system.</p>	<p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				<p>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?</p> <p>Better to concentrate on the Ferry service to Mends Street and extend to Coode St.</p> <p>A CAT bus around South Perth would be very useful - to include Canning Bridge Station and Angelo Street Shopping Precinct.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p>	
				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Comment noted.</p>	

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				<p>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.</p> <p>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.</p> <p>Nobody is going to come to see high rise buildings - they are more likely to come to get away from them.</p> <p>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.</p> <p>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.</p> <p>ANY building needs to fit into the streetscape/landscape.</p>		
214	17 May 2019	Email and feedback form	Neither Support nor Not Support	<p><u>Email Submission</u></p> <p>Suggestions to consolidate bus stops as follows:</p> <ul style="list-style-type: none"> All four routes (30, 31, 34 and 35) to use a common stop located in Mill Point Road somewhere between Mends Street and Judd Street, with a bus priority lane between this stop and Judd Street. Routes 30 and 31 could get access by right turn into Mends Street and then left turn into Mill Point Road. Route 35 could travel through the lights, left turn into Mends Street and then follow the 30 and 31. <p>This proposal will probably need a strip of land from Civic Heart, but if this bus stop could be achieved you could have a bus stop with a bus about every 5 minutes all day.</p> <p><u>Feedback form</u></p> <p>The plan should have 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.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>Re-routing the 30, 31 and 35 routes to ensure all buses pass through a common stop on Mill Point Road is not supported as it would make all three routes longer and more complex.</p>	-

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215	15 June 2019	Feedback Forms	Support	<p>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.</p> <p>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 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.</p>	Comment noted	A61 - 11
				<p>The height and plot ratio 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 its 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.</p> <p>The tiers scale down far too quickly from the Landmark site "civic heart" and the peninsula to lower height and plot ratio areas. Introduce more sites with no height limit 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</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>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.</p> <p>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.</p>	<p>Transferable air rights allow development rights to be bought and sold between landowners, but does not provide funding for public infrastructure or items that would benefit the users of a given area in general. The only people who would be "compensated" for any loss of amenity would be other landowners, who may not be residents. Residents who are renting, for example, would not receive any benefit.</p> <p>This system would allow buildings to be the same height, if adjacent owners decided not to exchange any development rights. "as of right" height limits are set in the draft Amendment No. 61 and the criteria for exceeding that limit are related to amenity, building design, tower bulk, and provision of a financial contribution to the City to be expended on items that benefit the users of the area.</p>	
				<p>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 alone with the project. Contributions from developers wanting to build taller can go into this fund.</p>	<p>Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.</p> <p>The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a</p>	

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					<p>station to be developed. However, it is not the objective of the ACP to justify construction of a train station.</p> <p>The City of South Perth will establish a special fund for the public benefit contributions and develop a detailed plan to guide the management and expenditure of contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	
				The city would also benefit from a tram system along the length of Mill Point Road and Labouchere Road. Or, in the short term, a free CAT bus system like in Fremantle and Perth CBD.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the ACP vision.	
				<p>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.</p> <p>Public benefit can be provided by good design outcomes, not just cash contributions or facilities within the projects.</p> <p>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 Mend Street Jetty.</p> <p>Particular bonus should be applied to hotel developments, to encourage more people to stay in the activity centre instead of Perth CBD.</p> <p>The requirements for approval of additional development are too strict.</p> <p>The height limits proposed particularly in the Mill Point zone are 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.</p> <p>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.</p>	<p>The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some changes are recommended to building height limits to address concerns raised in submissions relating to specific locations.</p> <p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p> <p>Including the key requirements in the Town Planning Scheme gives the highest possible level of certainty about land use and built form in the ACP area.</p>	

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				<p>Building heights and plot ratio levels are far too conservative. Particularly in the Mill Point zone, can be raised significantly due to prime location.</p> <p>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.</p> <p>Landmark sites should make up to majority of sites in the absolute core, where the zones intersect.</p> <p>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.</p> <p>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.</p> <p>Free up more sites where there are no restrictions and allow developers to be creative in their approach to proposals on those sites.</p>		
216	3 June 2019	Feedback Form	Support	There should not necessarily be a height restriction at all.	The proposed Amendment No. 61 includes building height and plot ratio limits for all three tiers to give the greatest possible certainty regarding building size. Building height limits have been set in accordance with the objectives set out at section 4.1.1 of the draft ACP. Building height limits for Tier 2 provide certainty regarding maximum potential building size and are recommended to be retained.	-
217	17 July 2019	Feedback Form		Would like to confirm that the height measured from natural ground level not 2.13 AHD and remove the car parking from plot ratio calculation.	<p>Amendment No. 61 measures building height from natural ground level. The suggestion to specify a height above Australian Height Datum (AHD) may suit a small number of sites; however, the use of natural ground level is more suitable for the majority of the ACP area and is a well-established basis for measuring building height.</p> <p>In the ACP area above-ground parking is included in the calculation of plot ratio. This encourages building designers to limit the amount of parking and/or to provide underground parking, and will also ensure that development of sites occurs within a reasonable footprint/height and may also help encourage thinner towers.</p>	-
				Slimmer towers and building tiering in height are ok as you will get more views for more residents.	Comment noted	

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218	14 May 2019	Feedback Form	Support	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.	Comment noted	-
219	14 May 2019	Feedback Form	Support	No further comment		-
220	19 July 2019	Feedback Form	Not Support	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.	Comment noted	ACP 11 & 12 A61 – 11
				There are no State Government plans to build a Train Station. All reference to this should be removed from this document.	The ACP aims to support the delivery of a South Perth train station by planning to focus the distribution of forecast growth in a way that contributes to the business case for a station to be developed. However, it is not the objective of the ACP to justify construction of a train station.	
				Plot Ratios are too generous and do not allow for the achievement of many of the descriptors applied to the four character areas.	Comment noted	
				The definition of the SPAC as a high level inner city AC is not supported by State Government documents.	The ACP area is located directly across the river from the Perth CBD, at the centre of the metropolitan area.	

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				<p>Defined building envelopes are too generous.</p> <p>Far too generous in many ways. Base height and permissible Tier 1 and 2 proposals are too high to achieve the descriptors of the Character Areas.</p> <p>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.</p>	<p>Building height limits focus areas with taller buildings close to Mends Street and the future train station to ensure larger scale development and population is within walking distance of public transport nodes. Building height limits step down progressively towards the foreshores and Mill Point peninsula.</p> <p>Detailed investigation of the impacts of changes to building height limits have been undertaken during preparation of the ACP and Amendment No. 61, along with assessment of the most suitable locations for higher density development to accommodate the expected growth of the area.</p> <p>The development requirements within proposed Amendment No. 61 aim to ameliorate negative impacts whilst enabling longer term population growth.</p> <p>Some minor changes are proposed to building height limits to address concerns raised in submissions relating to specific locations.</p>	
				<p>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. If they are to be permitted, they need to be high quality materials etc, but generally speaking should not be considered.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	
				<p>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.</p>	<p>Comment noted</p>	
				<p>"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!</p>	<p>Comment noted</p>	

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				<p>Need to be reduced to ensure the objectives of the Character Areas - as per my previous comments.</p>		
				<p>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?</p> <p>All buildings should be built to a Base Height only and be of exemplary design in this prestigious and desirable ACP location.</p> <p>Parking structure should be funded by public benefit contributions.</p> <p>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.</p>	<p>All buildings must meet a high standard of architectural design to ensure that any future development contributes to the high quality inner urban environment in the ACP area. All development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel.</p> <p>Design is by definition qualitative, i.e. there are no simple or numeric standards that can be applied to ensure high quality architecture. It is therefore essential to set clear expectations and robust processes to deliver high quality design.</p> <p>Architectural design requirements are set in the draft ACP and Amendment No. 61 to ensure that high standards of architecture are maintained for all proposed new buildings throughout the ACP area.</p> <p>Development above the Tier 1 height/plot ratio limits, up to the Tier 2 limits, must be of an exemplary design quality and must undertake a more rigorous design process, in the form of a design competition. This requirement reflects the scale and significance of development above the Tier 1 limits.</p> <p>It is not recommended to remove the requirement to undertake a design completion for proposals seeking to achieve exemplary design quality. However, policy P321 may be reviewed and amended to refine the design competition process once the ACP and Amendment No. 61 are finalised.</p> <p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area, and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p>	

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				<p>A lot more work is needed on this - detail on demographics, alternative options and feasibility of draft ACP objectives.</p> <p>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.</p> <p>It is naive to think that one parking bay is adequate for a 3 - 4 bedroom apartment. Comment from Real Estate Agents also suggests "that parking spaces sell apartments". I do not dispute the sustainability objectives but do dispute an ageing and young family population or many millennials are "car-less" or will be within 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.</p> <p>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.</p> <p>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.</p> <p>All opportunities for further investigation.</p>	<p>The City engaged expert transport planning consultants to prepare a report to inform the ACP (Appendix 2 to the ACP). This report is based on a large amount of technical modelling and analysis of the existing and future transport network that has been undertaken by the City over a number of years.</p> <p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p>	
				<p>Fine objectives that seem almost unattainable given what I have read about Building Size (Height and Plot Ratio), Podiums, Towers and Design Quality.</p> <p>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.</p> <p>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 Amendment 61.</p> <p>No traffic studies re: Mill Point Character Area, specifically the Peninsula.</p>	<p>Comment noted</p>	

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221	19 July 2019	Feedback Form		<p>Podium coverage and height should be reduced unless significant amalgamation of land parcels allows for corridors of open space at ground level.</p> <p>Building height and land area coverage should allow for more appropriate corridors of open space at ground level.</p> <p>Podium coverage and height should be reduced unless significant amalgamation of land parcels allows for corridors of open space at ground level.</p>	<p>The term “podium” refers to the ground and lower levels of a building that provide a clearly differentiated “base” or platform for a tower. Amendment No. 61 includes requirements for podium setbacks, height and site cover that define the maximum possible size of podiums, and their location on a site.</p> <p>Street setback requirements are set in Map 3 of Schedule 9B (Amendment No. 61) and range from nil to 15m. Street setbacks have been determined based on a combination of existing character (what setbacks are in each street today) and desired future character (what types of land uses and buildings are expected in each street in the future).</p> <p>Podiums cannot exceed two or three storeys in height throughout the ACP area and nil side and rear setbacks are only permitted in the Mends character area or in the other areas where it can be demonstrated that the nil setback does not have a detrimental impact on the streetscape character, adjacent properties or local amenity.</p> <p>It is recommended that the term ‘podium’ be replaced with the term ‘base’ in the ACP and Amendment No. 61 to clarify what is meant by this term. In addition, changes are recommended to the format of maps showing street setbacks in Amendment No. 61 to make required setbacks easier to understand.</p> <p>Improvements to Map 3, more clearly identifying the required setbacks of podiums, may resolve some of these concerns.</p>	ACP – 7 A61 – 12–17
				<p>Tower setbacks should be increased unless amalgamation of land parcels allows for larger corridors of open space at ground level.</p> <p>Tower height should be reduced unless significant amalgamation of land parcels allows for additional open space around towers.</p>	<p>The draft ACP and proposed Amendment No. 61 aim to provide certainty for development in the area, while allowing sufficient flexibility where required to facilitate high quality building design outcomes.</p>	
				<p>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).</p>	<p>Buildings within the draft ACP area are required to achieve at least a 4 Star Green Star rating, which represents Australian best practice. Buildings seeking additional height are likely to consider higher ratings to meet other design outcomes and demonstrate design excellence.</p> <p>The Green Star rating system includes many aspects of sustainable development, of which energy is only one.</p>	
				<p>Upgrades to provide improved pedestrian corridors, crossings and safety should be at least partially funded by Tier 1 and 2 developments.</p> <p>Increased developer contributions to fund upgrades to the specific area 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</p>	<p>The ACP and Amendment No. 61 aim to encourage variety in the built form – so sites will have different size buildings, with different designs. This is achieved through a tiered system of building height and plot ratio limits.</p> <p>Any building that exceeds the base (primary) building height or plot ratio limits must provide a public benefit contribution to the local government, calculated using the formula set out in Amendment No. 61. This formula is based on the value of the land and the additional amount of floor area being sought, and it ensures that developments seeking a greater amount of additional floor area must provide a larger contribution.</p> <p>The City of South Perth will establish a special fund for the contributions and develop a detailed plan to guide the management and expenditure of public benefit contributions. This plan will set out how the money will be spent including; the items that can be funded by public benefit contributions, the location of specific public benefits within the ACP area,</p>	

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					<p>and a clear plan for how and when these items will be delivered. It is expected that a draft of this plan will be completed in 2020, pending approval of the ACP.</p> <p>Section 7 of the draft ACP proposes guidance regarding potential public benefits that may be achieved via the additional height/tiering system.</p> <p>All public benefit contributions must be expended within the ACP area.</p>	
				<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The objectives stated in section 4.3.8 of the ACP reflect the need to reduce car dependence and facilitate a modal shift towards sustainable transport options. A maximum parking ratio encourages developers and owners to look at other ways to enable mobility including car share, sharing of bays and other options.</p> <p>Combined with Section 5 of the ACP the emphasis is on supporting and improving infrastructure for sustainable modes of transport including public transport.</p> <p>The location of the Train station is outside of the scope of this study. The place and location has been allocated within the design of the railway reserve within the freeway.</p>	
				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.	The zoo is reserved under the MRS as Regional Reserve - Parks and Recreation. It provides visual access to substantial tree canopy and contributes to an improved microclimate. Whilst it is not free to enter, the areas surrounding the zoo have tangible amenity benefits from its presence. The calculation of overall density would typically include Regional recreation spaces of this type.	
				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.	Comment noted	
				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 'feel-good' statements of the ACP rather than the reality of the planning outcomes that will result from amendment 61 being applied.	Comment noted	

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222	23 July 2019	Feedback Form	Support	The height should be taken from the natural deemed ground level as provided by state planning policy 7.3 of the residential design codes Vol 2. It provides a balance to the area.	Amendment No. 61 measures building height from natural ground level.	ACP – 27, 28, 33
				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 form 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.	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision. Mends and South Perth Esplanade will have a greater pedestrian focus providing a much more pedestrian friendly environment reflecting the anticipated movement of pedestrians.	
				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 regard 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.	Mid-block Links and Pocket Parks are shown as places of opportunity. The exact location of mid-block links and pocket parks is to be determined as development progresses. However, the indicative locations shown on Plan 5 of the ACP provide for forward planning to be undertaken by developers and the City to plan for creation of new mid-block links and small public open spaces. Where development is proposed in excess of the base (primary) building height and plot ratio limits there is provision in the draft ACP for funding of Mid-block Links as part of a public benefit contribution.	
223	15 May 2019	Feedback Form	Support	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.	All buildings within the draft ACP area must meet a high standard of architectural design. Design quality standards are defined in Section 4.3.3 of the draft ACP, and all development must meet a minimum good standard of design quality, with higher standards required for buildings that propose development above the base height and/or plot ratio. Development requirements for design quality are also prescribed in Amendment No. 61, including that all development must demonstrate a minimum standard of good design by meeting all of the relevant requirements set out by the State Government relating to architectural design quality, and that all proposals must be reviewed by a suitably qualified design review panel. Policy P321 only applies to developments that exceed the Tier 1 building height and/or plot ratio limits, which is not possible within the low height type area. Development that exceeds the Tier 1 height/plot ratio limit must be of exemplary design quality, which is to achieve a very high standard, above and beyond excellent design. This process consists of a competitive design process undertaken with a minimum of three suitably qualified architects and is independently assessed in accordance with the City's South Perth Activity Centre Competitive Design Policy (policy P321). These requirements ensure that high standards of design will be achieved for all development, with increased scrutiny to ensure taller buildings are of very high quality and are sensitive to the surrounding development.	-
224	20 July 2019	Feedback Form	Neither support or Not Support	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	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	-

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				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.	Comment noted	
				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.	Comment noted	
				<p>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.</p> <p>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.</p> <p>The current state government is seeking opportunities for industry diverse of location 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.</p> <p>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).</p>	<p>Appendix 1 to the ACP provides a detailed analysis of the economic and demographic characteristics on the ACP area.</p> <p>Comment noted</p>	
225	21 July 2019	Feedback Form	Not support	<p>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.</p> <p>Remainder of submission is as per submission 101.</p>	Refer to submission 101	A61 - 11
226				Mailing List	No comments	-
227				Mailing List	No comments	-

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228				Mailing List	No comments	-
229				Mailing List	No comments	-
230				No additional comments	No comments	-
231				Mailing List	No comments	-
232				Mailing List	No comments	-
233				Mailing List	No comments	-
234	22 July 2019	Email	Not Support	<p>Strongly object to the new height limits on the Esplanade under the proposed Town Planning Scheme Amendment No. 61, as part of the City of South Perth Town Planning Scheme No. 6, in lieu of the existing 24.5m.</p> <p>Furthermore, the decision to reduce the height limit between Frasers Lane and the Narrows bridge back down to 17.5 metres has absolutely no equity in the treatment of residents/developments on either side of Frasers Lane. If this decision remains standing, it will have an enormously negative effect on promised and expected views and values of properties, most of which were purchased by retired residents such as myself and not speculative investors.</p> <p>The height limit of 37.5 metres between Mends Street and Frasers Lane contravenes one of the main aims of the TPS No. 6 due to the lack of scaling /transition from the foreshore back towards the Civic Heart project. The relatively few additional units/rates income to the Council could be easily compensated for by a few additional floors on some of the proposed high-rise developments or one additional development in an area which would not adversely affect the values or the views to the city from existing residents.</p> <p>Not opposed generally to high rise development in South Perth, subject to traffic management in the local area. However, due to the aforementioned reasons the increase in the height limits on the foreshore are completely unjust and inequitable to the existing residents behind the affected area. The height limit should be reduced back down to 24.5 metres, which was the information at the time that the residents of Aurelia relied upon in purchasing their apartments. To enable a uniform height limit along the foreshore, I would naturally also support a height reduction to 17.5 metres.</p>	<p>The building height limit along South Perth Esplanade focusses taller buildings close to Mends Street to ensure larger scale development and population is within walking distance of the Mends Street ferry terminal.</p> <p>The permitted height of 24.3 metres is the expected typical height for development, whilst the tier system allows for potentially taller buildings up to a 37.5 metre limit. Building heights are to be measured to the highest point of wall or roof of the building. In addition, tower floorplate area limits require buildings above the permitted height limit to be slimmer, thus providing greater separation between buildings, wider view corridors and more ventilation.</p> <p>It is not recommended to decrease the building height limit in this location. However it is recommended to introduce a new requirement into the ACP to ensure that the orientation of towers is optimised for both the development and neighbouring properties.</p>	ACP 11 & 12
235	16 July 2019	Email	Not support	<p>The exit points for residents present and future living in the peninsula are restricted to Mill Point Road and Mends Street but both roads are not capable of 2 lanes of traffic in each direction.</p> <p>The road infrastructure to cope with the forecast for 2000 new residents is inadequate and in the case of a serious event could result in many fatalities. Add to this the transperth buses, incident</p>	Section 5 of the draft ACP provides guidance for improvements to the movement network in support of the draft ACP vision.	-

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				<p>control vehicles to attend to Freeway incidents and future construction vehicles can only exacerbate the problem.</p> <p>The current demographic is the elderly residents who endure traffic problems. Should the increase in building height eventuate, the demographic will change. The area will not encourage good traffic but result in increased use of vehicles.</p>		