



City of **Perth**

Attachments Under Separate Cover – Item 11.3 and 11.4

Agenda Briefing Session

6 December 2022

To the Lord Mayor and Councillors

Please find enclosed attachments under separate cover for the Agenda Briefing Session of the City of Perth to be held on Tuesday, 6 December 2022 in the Council Chamber, Level 9, 27 St Georges Terrace, Perth commencing at 5.00pm.

Michelle Reynolds

Chief Executive Officer

2 December 2022

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Attachment 1

CITY OF PERTH
LOCAL PLANNING STRATEGY
CONSULTATION OUTCOMES SUMMARY

NOVEMBER 2022

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1. Introduction

The draft Local Planning Strategy (draft Strategy) was certified by the Western Australian Planning Commission (WAPC) on 22 January 2022 for public advertising in accordance with the *Planning and Development (Local Planning Schemes) Regulations 2015*. Following the WAPC's decision, the Strategy was publicly advertised from 27 January 2022 and concluding on 25 March 2022¹.

Three community information sessions were held across February and March 2022 and submissions were welcomed via Engage Perth, post or email.

A total of 50 submissions were received (including late submissions and comments made via Engage Perth survey). Stakeholders providing submissions included residents, business owners, landowners, community groups, government agencies, the planning industry and peak bodies.

The content of submissions has been considered, analysed and where appropriate, meetings with external stakeholders have been carried out. Attachment 2 - *Schedule of Response to Submissions* outlines the City's response to all the submission matters received during the consultation period.

The purpose of this summary paper is to provide:

- An overview of the areas of support, identified gaps, and areas of concern raised by submitters.
- A summary of the main points/topics raised during consultation.
- High-level direction for planned modifications to the Strategy.

2. Background

The draft City Planning Strategy was endorsed by the then Commissioners for preliminary community feedback, with consultation occurring from June 2019 - August 2019. Elected Members were provided with the consultation outcomes in December 2020.

The Strategy was revised to respond to the feedback received from the community, Elected Members and the Department of Planning, Lands and Heritage (DPLH).

In 2021, the Western Australian Planning Commission released the *Local Planning Strategy Guidelines* (Guidelines), which sets out the manner and form for all local planning strategies. As a result, the Strategy was required to be restructured and modified to align with the Guidelines. Due to these changes, the Strategy required significant changes to the version that was advertised in 2019.

3. What have we heard?

There was generally a high level of support for the general direction and vision of the Strategy. Several submissions identified gaps in the Strategy content, as well as parts which could be strengthened.

The following snapshot (refer **Section 3.1-3.3**) details the consultation outcomes broken down by reference to the strategic pillars, as defined by the Strategic Community Plan. A snapshot of key themes as they relate spatially across Perth city neighbourhoods is also provided in **Section 3.4**.

A further detailed breakdown of the submissions (including the Administration's comments and the planned modifications to the Strategy) is provided in **Section 4** overleaf.

Some submissions raised areas of interest or concerns that are outside the role of the Local Planning Strategy, the scope of which is determined by the Western Australian Planning Commission.

¹ Note – The consultation period was extended from the initial closing date of 10 March 2022 until the 25 March 2022, with approval from the WAPC.

This strategy was also prepared in advance of the *Strategic Community Plan 2022-2032, Economic Development 2022-2032* and *Sustainability Strategy 2022-2032* which were adopted by the Council in April 2022. Modifications to the Strategy are recommended to provide alignment with these Strategies.

3.1. Liveable

Support	Concerns	Gaps
<ul style="list-style-type: none"> • Growth - increasing resident population and exceeding State Government population targets. • Vibrancy – increasing activation of the city. • Density - increasing density and height. • Housing - delivering diverse and affordable housing. 	<ul style="list-style-type: none"> • Capital City Spine - relevance and value in having Capital City Activity Spine. • Schools – identification and location of schools. • Vibrancy – vibrancy issues not addressed in sufficient detail. • Growth - higher population growth targets. • Connectivity – not coordinated and alignment of cycle paths not ideal. 	<ul style="list-style-type: none"> • Community Infrastructure – what infrastructure is required and how it will be delivered. • Sporting facilities – direction and planning for sporting facilities and public open space. • Precinct Planning – minimal areas identified for Precinct Structure Plans.

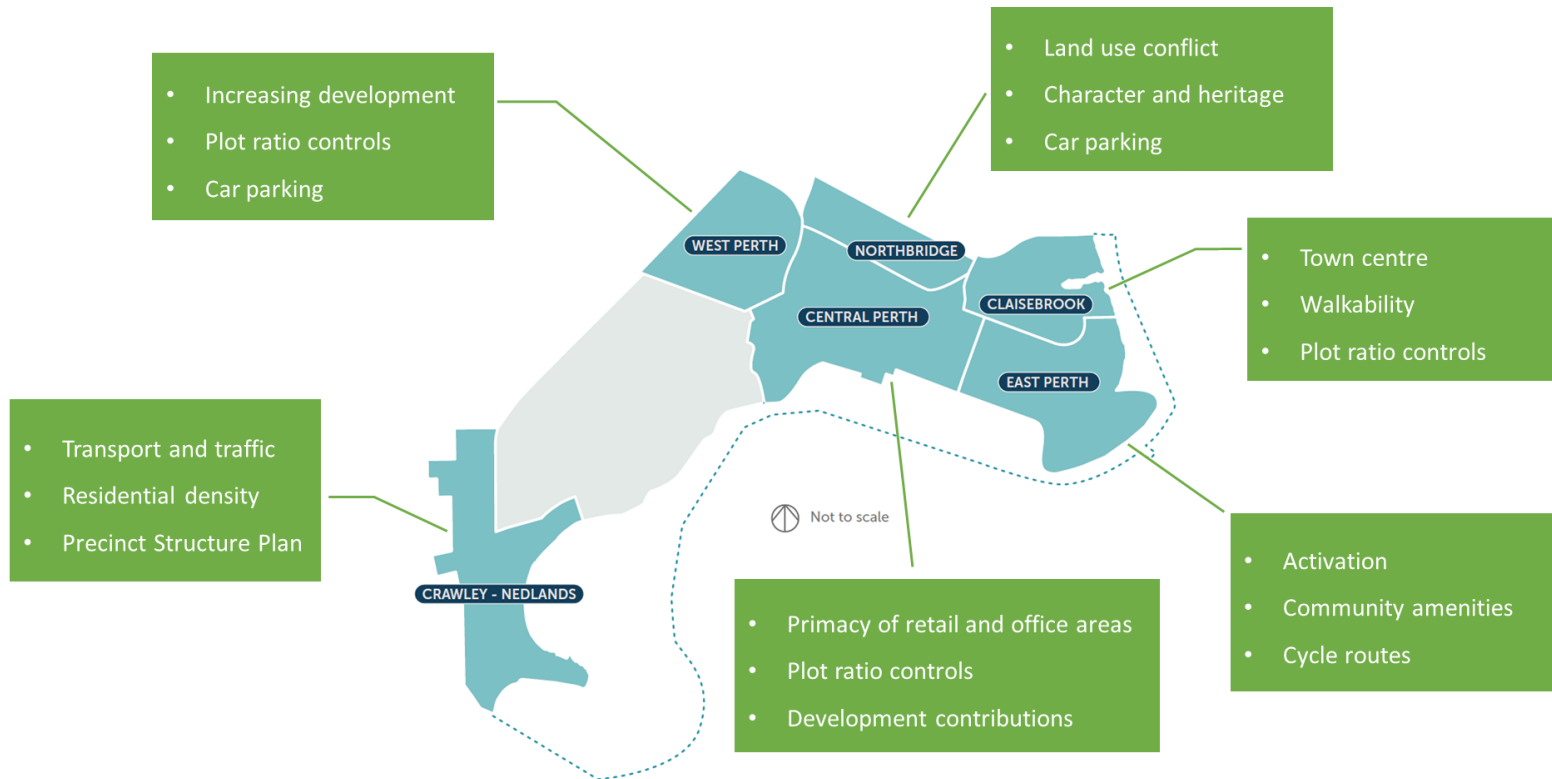
3.2. Sustainable

Support	Concerns	Gaps
<ul style="list-style-type: none"> • Climate Change - mitigating the risks of climate change. • Economy - diversifying land uses • Greening - increasing greening in private and public realms. • Transport - reviewing the Perth Parking Policy. • Built form – implementing Environmentally Sustainable Design requirements in new developments. 	<ul style="list-style-type: none"> • Climate Change – more could be done to address sustainability. • Transport - lowering maximum car parking requirements. • Greening - alignment of green links. 	<ul style="list-style-type: none"> • Climate Change - unclear position on carbon emissions and lack of carbon reduction targets. • Servicing - lack of consideration of freight and city servicing.

3.3. Prosperous

Support	Concerns	Gaps
<ul style="list-style-type: none"> • Growth – reviewing plot ratio bonuses and development incentives. • Processes - simplifying planning framework and reducing planning regulation where possible. 	<ul style="list-style-type: none"> • Vision – lack of vision and aspiration. • Document format – standardisation of the document not fitting for a capital city. • Transport - alignment of the inductive mass rapid transit route. • Growth - application of bonus plot ratio and Developer Contribution Plans. • Activity Centres – unclear on role and planning direction. 	<ul style="list-style-type: none"> • Investment – attracting private sector investment and industry growth. • Partnerships - absence of collaboration with State Government to deliver capital city infrastructure and aspirations. • Infrastructure – does not capitalise on City Deals projects.

3.4. Common Neighbourhood Themes



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4. Summary of Submissions


A full list of submissions made on the draft Strategy and the City's response to the matters has been detailed in Attachment 2 - *Schedule of Response to Submissions* of the agenda item. A brief summary of the key matters raised in submission responses is provided as follows:

Focus area	Comment Summary	City Response	Action Required
Vision, Content & Format 	<ul style="list-style-type: none"> General level of support for the overall vision and three pillars but some submissions advocated for a bolder vision. State Government manner and form requirements is not appropriate for capital city. The vision does not flow through into actions. Concern some statements in the Strategy are not supported by implementable actions. 	<ul style="list-style-type: none"> The importance of a bold vision for the city is agreed and supported. The City has been directed by State Government to align with standardised guidelines. The Strategy requires further refinement to ensure vision is clearly articulated in actions. All aspirations of the Strategy should be supported by corresponding actions. 	<ul style="list-style-type: none"> The Strategy vision is being reviewed to strengthen the aspirations for growth and development. No changes are proposed. The Strategy is being reviewed to identify where the link between vision and actions can be clearer. The Strategy is being reviewed to ensure all aspirations are supported by actions.
Governance & Collaboration 	<ul style="list-style-type: none"> Absence of coordinated and collaborative approach to planning across all levels of government. High level of support for simplifying the planning framework, where possible. 	<ul style="list-style-type: none"> The importance of aligning State and City priorities is agreed. This is being investigated as part of the new Local Planning Scheme. 	<ul style="list-style-type: none"> The updated Strategy will provide additional detail on the complex governance arrangement and the need for improved collaboration. No changes are proposed.
Population Growth 	<ul style="list-style-type: none"> Wide-spread support for Intensification Investigation Areas and the City's endeavors to increase resident population. Suggestions that population targets could be more ambitious – primarily for Central Perth and East Perth neighbourhoods. 	<ul style="list-style-type: none"> The City is seeking to accelerate this growth to achieve 55,000 residents by 2036, in line with its <i>Strategic Community Plan 2022-2032</i>. The Strategy ensures an appropriate distribution of growth across neighbourhoods. 	<ul style="list-style-type: none"> No changes are proposed. No changes to the Strategy are considered necessary as the Strategy aligns with the City's agreed population target.

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<p>City investment & Economic Recovery</p> 	<ul style="list-style-type: none"> Concerns regarding the value in having Capital City Activity Spine. Concern raised regarding the limited direction to stimulate investment and promoting economic recovery in the city. General support to encourage a range of land uses and consideration for bonuses/incentives to achieve land use outcomes – including affordable housing. Concerns the Strategy does not capitalise on City Deal projects. 	<ul style="list-style-type: none"> Agreed, the role of the Capital City Activity Spine is limited. The City's new Economic Development Strategy manages the City's plans for stimulating investment. The local planning framework has an important role in enabling growth across economic sectors. The City has received advice from the State Government for detail of City Deal projects to not be included in the draft Strategy. 	<ul style="list-style-type: none"> The Capital City Activity Centre Spine has been reconsidered. The Strategy has been updated to reflect key land use and planning actions from the <i>City's Economic Development Strategy 2022-2032</i>. No changes are proposed. No changes are proposed.
<p>Community Infrastructure Planning</p> 	<ul style="list-style-type: none"> Absence of planning for sporting facilities and public open space. Identification and location of schools should be removed from document as it is preempting State Government decisions. Insufficient detail and identification of community infrastructure required and how it will be delivered. 	<ul style="list-style-type: none"> The City is currently Preparing an Open Space Framework to guide open space planning. The Strategy is considered to provide sufficient detail on planning for sporting facilities and public open space. Agreed, the identification of the City's preferred location of schools may create false expectations with the community. The City plans to determine community infrastructure needs through a Social Needs Analysis. 	<ul style="list-style-type: none"> No changes are proposed. The Strategy has been updated to remove the preferred location of school sites. The Strategy has been updated to reflect the preparation of the Social Needs Analysis to inform a future Community Infrastructure Plan.

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<p>Sustainable Development</p> 	<ul style="list-style-type: none"> • High level of support for mitigating the risks of climate change, some submission suggests more detail could be included. • Support for incentivising sustainable development. • Stronger focus on sustainability principles, including reference to carbon/sustainability targets and the net zero emissions. • Suggestion that incentives be considered for the adaptive reuse of existing underutilised building stock. • Mixed views on what sustainability rating tools will be adopted or mandated to achieve sustainable built form and design. • High level of support for increased greening on public and private land. 	<ul style="list-style-type: none"> • The City's new <i>Sustainability Strategy 2022-2032</i> provides further detail to guide mitigating the risk from climate change. • Noted, and will be considered further as part of the new scheme. • Agreed, the Strategy seeks to support the outcomes of the City's new <i>Sustainability Strategy 2022-2032</i>. • Action CUG4 to ensure high quality, functional and attractive development with high standards of environmentally sustainable design, seeks to improve the environmentally sustainable design of developments, including adaptive reuse. • Noted, and will be investigated further as part of the new Local Planning Scheme. • Noted, and will be investigated further as part of the new Local Planning Scheme. 	<ul style="list-style-type: none"> • No changes are proposed. • No changes are proposed. • The Strategy has been reviewed to ensure alignment with the City's <i>Sustainability Strategy 2022-2032</i> and specifically reference the desire to reach net zero emissions. • Additional text to be added to CUG4 to clarify and reaffirm the City's intentions. • No changes are proposed. • No changes are proposed.
<p>Built Form</p> 	<ul style="list-style-type: none"> • Widespread support reviewing and increasing plot ratios and building height. • Wide-spread support for the removal of plot ratio and built form controls from the Local Planning Scheme into planning policy. • Some caution expressed in the application of bonus plot ratio, suggesting it is determined by market analysis. 	<ul style="list-style-type: none"> • Noted, and will be investigated further as part of the new scheme. • Noted, and will be investigated further as part of the new scheme. • Noted, and will be investigated further as part of the new scheme. 	<ul style="list-style-type: none"> • No changes are proposed. • No changes are proposed. • No changes are proposed.

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	<ul style="list-style-type: none"> • Site-specific submissions requesting inclusion in the Intensification Investigation Area and/or increased building height. 	<ul style="list-style-type: none"> • The Intensification Investigation Area boundaries are determined based on the urban consolidation principles detailed in the Strategy. 	<ul style="list-style-type: none"> • Site specific changes have been dealt with on a case-by-case basis and undertaken where there is a logical planning rational.
<p>Connectivity & Transport</p> 	<ul style="list-style-type: none"> • Wide-spread support for improving connectivity and reducing severance. • Wide-spread support for review of Perth Parking Policy. • Concern raised with respect to the indicative alignments of mass-rapid transit through QEII medical centre. • Indicative route of East - West mass-rapid transit route not supported. • Concern there is no detailed plan for underground or mass-rapid transit and how the infrastructure will be delivered. • Concerns raised with respect to cycle path alignments. • Car-sharing, automated vehicles and impact of emerging technologies is not addressed. • Does not consider servicing and freight. 	<ul style="list-style-type: none"> • The City will collaborate with State Government to improve connectivity as opportunities arise. • The City will continue to work with Department of Transport to identify opportunities to improve the Perth Parking Policy. • Agreed, minor amendments can be made to improve the alignment. • The route represents the City's preferred alignment, noting it is only indicative. • The Strategy is considered to provide sufficient detail on future mass transit. • Cycle path routes will be considered as part of the preparation of a new Cycle Plan, having due regard to the State Government's Long-Term Cycle Network and other transport priorities. • Emerging and existing transport trends will be investigated further by the City in future transport planning. • Freight movements will be considered in broader transport planning by the City's Transport and Urban Design Unit. 	<ul style="list-style-type: none"> • No changes are proposed. • No changes are proposed. • The indicative mass-rapid transport route has been amended to run along Winthrop Ave. • No changes are proposed. • No changes are proposed, noting major transit infrastructure is the responsibility of State Government. • Actions in Strategy amended to note the City's intent to prepare a Cycle Plan. • No changes are proposed. Future changes may be considered as advised by the City's Transport and Urban Design Unit. • No changes are proposed.

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<p>City Vibrancy & Improvement</p> 	<ul style="list-style-type: none"> Concern raised around alignment of green links, or requests for additional linkages. Support the Strategy's focus on encouraging built form that contributes to 'sense of place,' however, some submissions noted the actions do not reflect this intention. Concern that improving city vibrancy is not addressed in sufficient detail. Concern around the lack of area specific direction on public realm improvements to support neighbourhood priorities. 	<ul style="list-style-type: none"> The Strategy needs to align with the findings of City's <i>Green Infrastructure and Biodiversity Study</i>. Several actions focus on improving the way developments interface with the public realm. However, more detail could be provided on broader public realm improvements. Vibrancy will benefit from public realm and built form improvements and diversifying land uses could be made clearer. Agreed, additional detail could be provided to clarify some of the projects being undertaking in public realm, including the Main Street Refresh. 	<ul style="list-style-type: none"> Figure 8 – Environment Map updated to ensure green and urban links align with the City's <i>Green Infrastructure and Biodiversity Study</i>. An additional action has been included to address the public realm improvements that should be addressed within the City's Neighbourhood Place Plans. The link between vibrancy and the Strategy actions can be made clearer through the above public realm action. No changes are proposed as this gap will be addressed through the abovementioned public realm action.
<p>Activity Centre Planning</p> 	<ul style="list-style-type: none"> Concerns the role of activity centres is not well defined and there is limited guidance on mix of uses, intensity of development and vision for growth of these centres. Concerns minimal areas have been identified for Precinct Structure Plans. 	<ul style="list-style-type: none"> The Strategy includes Activity Focus Areas for the neighbourhood scale centres and each Neighbourhood includes 'Planning Directions' around land use, urban form intensity and commercial floorspace. The Strategy includes four precinct planning areas which is considered sufficient. 	<ul style="list-style-type: none"> No changes proposed. No changes are proposed. The new planning scheme will provide a fresh planning framework for other areas.
<p>Car Parking</p> 	<ul style="list-style-type: none"> Mixed responses with respect to a change in car parking rates with majority of submissions suggesting flexibility be maintained in terms of maximum car parking provisions. 	<ul style="list-style-type: none"> Car parking will be investigated further through the preparation of the new Local Planning Scheme. Any changes to car parking rates will be tested to ensure they are effective and practical. 	<ul style="list-style-type: none"> No changes are proposed.

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Developer Contribution Plans	<ul style="list-style-type: none">• Concern raised with respect to the form and application of Developer Contribution Plans impacting the feasibility of development.	<ul style="list-style-type: none">• The Strategy identifies the need to investigate developer contribution plans. No decision has been made to date on the implementation method.	<ul style="list-style-type: none">• No changes are proposed.
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LOCAL PLANNING STRATEGY - ATTACHMENT 2 - Schedule of Response to Submissions

REFERENCE	SUBMITTER CATEGORY	NEIGHBOURHOOD	COMMENT	RESPONSE	ACTION
1	Resident/ Business owner	East Perth	Encourage great street activation around Adelaide terrace/Hay Street. The area is lifeless.	<p>The Strategy promotes the activation of the town centre located on Hay Street and mixed use centred along Adelaide Terrace, with a greater emphasis placed on residential development which will improve activation and liveliness of the neighbourhood.</p> <p>A new action has also been added in the East Perth Neighbourhood to include the enhancement of the Neighbourhood Place Plans to address neighbourhood priorities and public realm improvements.</p>	Introduce an Action for all Strategy neighbourhoods to expand the City's Neighbourhood Place Plans to address neighbourhood priorities and public realm improvements.
2	Resident	East Perth	<p>Overall good draft strategy.</p> <p>We need to focus on retaining our beautiful green spaces and local wildlife which have been critical to those of us city dwellers living through lock-downs and Covid. Also, important to push developments to think more about the environment with electric car charging, solar energy etc.</p> <p>There is also clear need for a school + supermarket in the East Perth area if you want to service that big of a population.</p> <p>Need to retain / enhance the community and sporting establishments such as Tattersals Bowling club, the proposed public pool / gym in the WACA etc.</p> <p>Please get on with the plan, it's good to talk and consider but I think we now need to spend some tax dollars and get some work done. The Waterbank area has sat idle for 3-4 years.</p>	<p>The submission comment is noted.</p> <p>The City's established public open spaces will be retained, and the Strategy provides actions to enhance urban greening within both the public and private realms.</p> <p>The Local Planning Strategy establishes the introduction of built form provisions and investigation of plot ratio incentives to promote Environmentally Sustainable Design by achieving higher green star ratings.</p> <p>This will encourage the provision of design elements such as solar panels, water efficient fixtures, natural ventilation, heating and cooling as well as electric charging stations being implemented in all new developments.</p> <p>The Neighbourhood Planning Directions and Actions for the East Perth Neighbourhood identify the need to:</p> <ul style="list-style-type: none"> Investigate incentives to encourage the delivery of a full-line supermarket within or well connected to the Hay Street Neighborhood Centre; and Advocate to the State Government for the provision of a new public primary and secondary school in the neighbourhood. <p>The Strategy identifies the need to work with State Government for the delivery of recreational and community facilities to support the residential community.</p> <p>The City is also commencing work to identify City assets and facilities which could be better utilised to address gaps in the provision of community infrastructure.</p>	<p>Nil</p> <p>Nil</p> <p>Nil</p>
3	Resident	Crawley-Nedlands	Please limit high-rise and incorporate more open green spaces into developments of all types.	The City's Local Planning Strategy is required to achieve, and where appropriate exceed the population and dwelling infill targets set out by the State Government's <i>Perth and Peel at 3.5million Sub-Regional Planning Framework</i> .	Nil

REFERENCE	SUBMITTER CATEGORY	NEIGHBOURHOOD	COMMENT	RESPONSE	ACTION
				<p>In this regard, the distribution of density across the city will be based off urban consolidation principles (as outlined within Part Two - 4.2.1 of the Strategy) as follows:</p> <ol style="list-style-type: none"> Consolidate development to make better use of land around: <ul style="list-style-type: none"> The Central Perth Capital City Office area along St Georges Terrace to reinforce its primacy; Neighbourhood centres and nodes; Train stations and public transport nodes; and Open spaces. Protect the following: <ul style="list-style-type: none"> Environmental values and assets; Character and heritage value and quality; Comfortable microclimates within key pedestrian areas and open spaces; Comfortable intensity/scale of development in neighbourhood centres; and A gradation of intensity/scale of development down to the river. <p>Building heights in Crawley-Nedlands will be determined as a component of the UWA-QEIIIMC Specialised Centre Precinct Plan, which is currently being prepared and will be advertised for public consultation.</p>	
4	Resident	East Perth	No comment	The submission comment is noted.	Nil
5	Resident / Business owner / Community group member	Crawley-Nedlands	Put Perth at the forefront of sustainability and environmental conservation. This will solve many of our problems and induce people to come to our beautiful city.	<p>The City's Sustainability Strategy (2022) seeks to ensure the City leads by example by understanding the impact of its operations by setting targets and implementing measures to improve the organisation's performance.</p> <p>The City will also encourage and support the broader community to assist in delivering the City's sustainability objectives through various Strategy's (including the Local Planning Strategy) and plans.</p> <p>The Local Planning Strategy has been prepared to set out the land use planning direction and actions that need to occur within the City's control. The objectives and initiatives of Strategies prepared by the City recognise the need to advocate and partner with others to achieve sustainability outcomes in areas the City does not directly control.</p>	Nil
6	Resident	East Perth	A bike path going down Bennett street through Langley park is a terrible idea. Langley park has a rich history and the park, in its current state, should be protected. Not to mention the safety issue of cyclists coming down the	The submitters concern is noted.	Remove cycle paths from Figure 9 and add a new Action to investigate and confirm bike path routes

REFERENCE	SUBMITTER CATEGORY	NEIGHBOURHOOD	COMMENT	RESPONSE	ACTION
			Bennett street hill only to cross 2 x intersections (on Terrace road and riverside drive). Would it not make more sense to use the existing intersection controls on either side of the park (Plane Street or Victoria Ave).	The City will prepare a new Cycle Plan to consider the cycle network in greater detail, having due regard to the State Government's Long-Term Cycle Network and other transport priorities. As a result, the indicative cycle routes depicted on Figure 9 have been removed from the Local Planning Strategy. Public consultation will take place in preparing the Cycle Plan where residents and stakeholders can provide feedback for the City's consideration.	through a bicycle path plan, having due regard to the Department of Transport's Long-Term Cycle Network.
7	Business Owner / Non-residential landowner - Rep. Curtin Business School	Central Perth	<p>I would like to highlight that we appreciated the structure, legibility and consistency of your documents as it made them both easy to access and review.</p> <p>We also support your vision to strategically re-invigorate the growth and economic, social and cultural opportunities offered by Perth City. We support your medium intensification in targeted nodes, strengthening connectivity and city legibility across the various modalities, strengthening our City's connection to the Swan River, and encouraging development in character areas whilst also protecting the traditional fine grain of the heritage buildings. This strategy is particularly relevant to Curtin University as we have been part of the city landscape for 15 years and have recently invested in four CBD heritage locations.</p> <p>We understand that a Local Planning Strategy in a city context is complex and multilayered, and we appreciated our inclusion in the Draft Local Planning Strategy Part 1 in figure 4 and 4.2.6 Perth City Deal. However, we were disappointed that Curtin University is absent from your Draft Local Planning Strategy MAPS when CQ University, the future ECU University, TAFE and Mercedes College are all included. Curtin's Law School is included in 4.4 Economy and Employment, but the Graduate School of Business (across the road) is omitted as are the St George's Terrace locations.</p> <p>Central Perth 5.1 Table 14 identifies the key character areas. The Historic Heart (Murray Street East) is absent from this scheme. Given the agglomeration of a plethora of heritage buildings, recent investment by the Westin, the presence of Royal Perth Hospital as a major CBD employment and visitation generator, and the presence of a WA University in this location, the omission seems to</p>	<p>The submission comments are noted.</p> <p>The submission comments are noted.</p> <p>The submitters concern is noted. Figure 4 - <i>Local Planning Strategy Map</i> has been updated to include Curtin University assets. Additionally, Figure 7 – <i>Economy and Employment Map</i> has also been updated to reflect this change.</p> <p>The City has engaged consultants to undertake a 'Character & Heritage Area Study' to inform the new Local Planning Scheme and Local Policy Framework.</p> <p>The 'Murray Street East' area is included under investigation as an expanded heritage precinct. It is important to note that heritage and</p>	<p>Nil</p> <p>Nil</p> <p>Amend Figure 4 and Figure 7 to articulate Curtin University assets.</p> <p>Nil</p>

REFERENCE	SUBMITTER CATEGORY	NEIGHBOURHOOD	COMMENT	RESPONSE	ACTION
			<p>be a gap in the planning strategy. Could this please be reconsidered?</p> <p>We have previously been told that a future Royal Perth Hospital site is identified. We speculate that whilst it would be relevant to include in a planning strategy, you may be under instructions to retain this confidentiality of this location. If not, could this be included in the Section 4.4 Economy and Employment?</p> <p>We accept that you will have deep patronage/economic data underpinning the rationalisation of Mclver and Claisebrook train stations but we also rely on this data supporting the customer experience in as much the rationalisation does not extend the journey times of employees in the health and education sectors in that area of the city.</p> <p>We understand that issues associated with homelessness and vagrancy are deeply problematic and difficult. However, a strategy to address this seems essential when contemplating the reactivation of the city. Our Law School is currently dealing with a vagrancy issue that is causing our staff and students concern. I have been told – anecdotally – of design firms seeking to relocate out of the city because of this issue. However, I would like to reiterate that we sympathize with the City of Perth’s predicament and the myriad of challenges associated with resolving this matter at a City and State Government level.</p>	<p>character areas are different, as detailed in the Local Planning Strategy (Part 2).</p> <p>The submitters concern is noted.</p> <p>Any future planning for the Royal Perth Hospital will be led by the State Government. The City acknowledges that previous master planning for the site has been undertaken and should be considered in any future redevelopment plans. Action CP7 of the Local Planning Strategy has been modified in this regard.</p> <p>The Strategy provides an action to work with State Government to undertake a detailed study of Mclver and Claisebrook station. The Study will seek to consider the rationalisation of the Stations to:</p> <ul style="list-style-type: none"> • Unlock opportunities on underutilised land; • Improve connectivity and address severance issues; and • Seek to better capitalise on key transport infrastructure. <p>The City notes that this study would need to consider the impacts on the existing public transport system.</p> <p>The City is committed to working with the State Government to significantly reduce homelessness.</p> <p>As component of this work, the City adopted a Rough Sleeper Plan in 2021. The plan has 6 key priority areas to assist with this issue including:</p> <ul style="list-style-type: none"> • Advocate for resources and services to support people experiencing rough sleeping in the City of Perth; • Coordination of services in the public realm; • Improving connection of people sleeping rough to support services; • Improving the health and wellbeing of people sleeping rough; • Understanding rough sleeping trends in the City of Perth; and • Improve the community’s understanding and awareness of homelessness, particularly rough sleeping. 	<p>Amend Action CP7 to include reference to the role of the Royal Perth Hospital as a significant medical and research facility and a major employer for Perth and include considerations for any future redevelopment.</p> <p>Nil</p> <p>Nil</p>
8	Resident	East Perth	<p>Putting a cycle way down Bennett Street and across Langley Park, doesn't make sense and will result in an increase of car / cycle / pedestrian accidents in Bennett Street - see section 4.6.3 Servicing and page 48 of part 1 of the draft plan for the proposed route. This option is:</p> <ol style="list-style-type: none"> 1. dangerous for local residents and public accessing Langley park - both walking residents and those 	<p>The submitters concerns are noted.</p> <p>The City will prepare a new Cycle Plan to consider the cycle network in greater detail, having due regard to the State Government’s Long-Term Cycle Network and other transport priorities.</p> <p>As a result, the indicative cycle routes depicted on Figure 9 have been removed from the Local Planning Strategy. Public consultation</p>	<p>Remove cycle paths from Figure 9 and add a new Action to investigate and confirm bike path routes through a bicycle path plan, having due regard to the Department of</p>

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			<p>driving too and from their residences or work buildings along Bennett street.</p> <p>2. contravenes the zoning of Langley Park as an airstrip and possibly its Heritage listing;</p> <p>3. will limit the use of Langley park for public functions optimally requiring the use of the full park.</p> <p>The obvious alternative is to use Plain Street, which is much wider than Bennett Street and has significantly fewer residential and business premises along the street and links better from Claisebrook Cove to the Swan foreshore.</p> <p>A key issue is all the cycle traffic coming up and down Bennett Street from Adelaide Terrace to Terrace Road, will create un-necessary hazards for residents & commercial occupants, driving in or out of their buildings onto Bennett Street. As well many locals walk around Langley Park every morning and will have to contend with large numbers of bikes as well as vehicles when walking across Bennett street. Many residents and business workers situated along Terrace Road also regularly drive and walk up and down Bennett road along this route. To make it worse, a range of buses come down Bennett Road every 10-15 minutes during the day. These factors, in aggregate, will also make it more dangerous for cyclist contending with local traffic in Bennett street and travelling across Terrace Road.</p> <p>In summary, this proposal for the cycle path is short sighted, will increase accidents in travelling up and down and across Bennett street close to Langley Park. There is a better alternative to use Plain Street which will support cyclist more easily accessing the foreshore route.</p>	will take place in preparing the Cycle Plan where residents and stakeholders can provide feedback for the City's consideration.	Transport's Long-Term Cycle Network.
9	Resident	East Perth	<p>I refer to the proposed cycle path across Langley Park from Bennett Street to Riverside Drive and wish to register my strongest opposition to the proposal:</p> <p>The termination of the proposed path at Riverside Drive is particularly short sighted because it will cause cyclists to attempt to join traffic on a major vehicle artery without traffic lights.</p> <p>It makes more sense to run the cycle path along Terrace Road for one block to Plain Street where at the junction of Riverside Drive, there are already installed traffic</p>	<p>The submitters concerns are noted.</p> <p>The City will prepare a new Cycle Plan to consider the cycle network in greater detail, having due regard to the State Government's Long-Term Cycle Network and other transport priorities.</p> <p>As a result, the indicative cycle routes depicted on Figure 9 have been removed from the Local Planning Strategy. Public consultation will take place in preparing the Cycle Plan where residents and stakeholders can provide feedback for the City's consideration.</p>	Remove cycle paths from Figure 9 and add a new Action to investigate and confirm bike path routes through a bicycle path plan, having due regard to the Department of Transport's Long-Term Cycle Network.

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			<p>past city planning scheme has held the city in a stagnating planning cycle for too long.</p> <p>The impact and consequence of a past inflexible planning strategy from the City's position has forced other WA State Government planning authorities like DAPs and State Development agencies, together with emergency planning contingency legislation, to usurp the role of the City of Perth in moving the city into contemporary expectations of delivering better planning outcomes for a growing capital city. That is not to criticise the current CoP planning regime but simply to acknowledge that unimaginative, inflexible planning schemes in the past have restrained the city from maximizing it's growth opportunity.</p> <p>Indeed 10 year planning cycle reviews are probably more relevant than ever in a rapidly developing state such as Western Australia. As if to emphasise this fact, one only needs to note the nearby competing hinterland suburbs of South Perth, Subiaco, Victoria Park, Applecross, and Melville to observe competing suburban planning visions now outpacing Perth with multi-rise mixed residential development that is now surrounding Perth city. Perth's doorstep suburban hinterlands are growing their populations and rate base, almost trapping Perth city in a low or no growth regime. It's not just about Perth looking inward at itself but at what other competing municipalities are planning also. Perth city, regardless of if it recognises it or not, is in a competing land use and built form race.</p> <p>Instead of Perth city being at the top of the spatial visual hierarchy and built form, it has become a medium visual bowl like City within a surrounding high-rise hinterland. That is a problem of the City's own making and if nothing else comparing this current strategy review should also be designed to regain the lost competitive attraction the city once commanded. To that extent then we note the Capital City Vision wheel (Fig 4), acknowledging the City of Perth as the prime economic social cultural and civil centre in WA.</p> <p>Turning more specifically to the Crawley /Nedlands document our area of particular interest (Fig 5) we have several major concerns. Our particular interest in this</p>	<p>to time to adapt to changing circumstances and allow for flexibility and innovation in future planning across the city.</p> <p>The submission comments are noted.</p> <p>The City's existing Local Planning Scheme allows for a range of development to occur across the city, with many development requirements able to be varied dependent on the applicable circumstances. The City's intent, as outlined by the Strategy, is to adopt a flexible approach to the new planning framework to allow for innovation and adaptation to meet changing social, economic, and environmental circumstances.</p> <p>Urban consolidation throughout the Perth metropolitan area is a core planning principle set out by the Western Australian Planning Commission's <i>Perth and Peel at 3.5million</i> Strategic Plan.</p> <p>That said, the City of Perth is one of the fastest growing populations in WA, with a growth rate of 7.1% in 2020 compared to a national average of 1.3%. According to Australian Government - Centre for Population, the City of Perth has had one of the greatest population growth rates over a 10-year period, comparable to the City of Swan, City of Armadale, City of Kwinana, and the City of Rockingham. It is also higher than other local governments such as City of Fremantle, City of Wanneroo, City of Joondalup, and City of Melville.</p> <p>A key action within the Local Planning Strategy is to further increase its residential population base, as well as attracting visitors and businesses into the city.</p> <p>The plot ratio and density of land within Crawley-Nedlands will be determined through the detailed planning being undertaken as part of the UWA-QEIMC Specialised Centre Precinct Plan and will align</p>	<p>Nil</p> <p>Nil</p> <p>Nil</p>

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			<p>component of the document is the fact that we own the last piece of significant englobo undeveloped single residential land of some 3000sqm in Crawley which also makes us the largest individual residential ratepayer within the actual Crawley precinct. Our property is the most significant piece of land within the Crawley precinct and its future is critical to creating a statement building consistent with a capital city vision. It's current zoning and plot ratio contained in a planning regime of past era does not permit its potential to be fulfilled, nor to meet the vision articulated in the capital city vision wheel (Fig4).</p> <p>Firstly, we make the point the strategy document has grouped the locations of Crawley and Nedlands as one and the same, but they are not!! (See 5.6.4). The delineation spatially between Nedlands and Crawley is defined by the interdiction of the University of WA campus site seen in Fig3 LPSM, and it's associated residential component. Crawley, spatially and geographically, has historically been part of the City of Perth's planning jurisdiction, abounded by Mounts Bay Road, Park Avenue, and Crawley Avenue and abutted by Kings Park, whereas the areas around Hampden Road, including the areas west of the Hospital precinct and south along Hampden Rd, were a part of the City of Subiaco jurisdiction, referred to as Hollywood, they exhibit little, if anything, geographically, spatially or characteristically in common with Crawley per se.</p> <p>Furthermore, the rateable properties share no common base, with the CoP traditionally levying greater rates than the former municipality, the City of Subiaco levied. We also note Fig3 local planning strategy map, which is the overarching document, executing the capital city vision and other associated documents, following from these two core foundations. The Hampden Road area now excised from Subiaco and contained within the CoP jurisdiction, referred to as Nedlands (East Nedlands), exhibits mixed characteristics of single residential, educational, commercial, retail, and industrial areas, being in land and built form, completely distinct from Crawley per se, which is a tightly held exclusive piece of</p>	<p>with the vision, neighbourhood priority and planning directions articulated in the Crawley-Nedlands Neighbourhood.</p> <p>The Crawley-Nedlands neighbourhood aligns with draft <i>State Planning Policy 4.2 – Activity Centres</i>. The Policy shows the whole neighbourhood as a 'Specialised Centre'.</p> <p>A Specialised Centre requires further detailed planning in the form of a Precinct Plan, as noted in Table 35 of the Local Planning Strategy.</p> <p>The Precinct Plan will consider the contextual differences across the neighbourhood, particularly in terms of their existing character (refer to Table 34 within Part 1 which identifies the different character areas in Crawley-Nedlands Neighbourhood).</p> <p>The UWA-QEIMC Specialised Centre Precinct Plan will introduce planning controls to respond to its existing and future intended context.</p> <p>Noted, refer to above response.</p>	<p>Nil</p> <p>Nil</p>

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			<p>mixed residential land only, devoid of any serious commercial development whatsoever. From a planning perspective to propose that actual or real Crawley and Nedlands East more correctly have common characteristics that may establish common planning disciplines and characteristics limits the potential future opportunities available through acknowledgement of the existing locational differences.</p> <p>Moreover, unlike Real Crawley which has existing high rise residential apartments and developments of up to 24 storeys Nedlands East has no existing buildings comparable, indeed a few around 3 storeys is at best not comparable with Crawley. Whilst Nedlands West is now under its recent new planning scheme within the City of Nedlands and experiencing some redevelopment its considered low rise with 6 storeys maximum, but even then that is not comparable to the existing 39 metre height limit and 12 storeys currently possible in real Crawley. It is therefore difficult strategically to reconcile that Real Crawley and Nedlands East should be considered one in the same for planning purposes. The reason Crawley has existing high rise residential characteristics that share nothing in common with Nedlands East lies in the fact that historically Perth city a, capital city had a different capital city vision planning wise than the City of Subiaco ,a suburban residential area with a low rise suburban planning vision. Our concern in attaching actual Crawley to Nedlands East in future precinct planning, as has been done, will not confirm the obvious difference and trap real Crawley in a time warp, now evident in the past suburban mindset of the former Subiaco single residential area and common to Nedlands East ratepayers.</p> <p>To confirm that anecdotal observation, it's clear from the public forums that there is a lobby group comprised of ageing Nedlands East residents, under the misleading guise of City of Perth Ratepayers Association, that continue to vigorously resist any planning proposals for increased density and landform intensification whatsoever, particularly Crawley, despite the CoP</p>	<p>Noted, refer to above response.</p> <p>Future planning for the area will need to balance the vision and objectives of the Local Planning Strategy together with the State Planning Framework with the community's aspirations.</p> <p>As referenced above, the Strategy identifies the different character areas in the Crawley-Nedlands neighbourhood.</p> <p>Future land uses, built form, public realm and infrastructure response will be determined through the detailed planning required</p>	<p>Nil</p> <p>Nil</p>

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			<p>population density objectives and the fact that Crawley is already a multi-storey residential precinct.</p> <p>These Nedlands East residents dominate the voice and views of the City Rate Payers Association and originally vigorously resisted East Nedlands being excised from Subiaco and cojoined to the City of Perth. This current strategic proposal document does not recognise the differences in existing land use, indeed characterises Nedlands East and Real Crawley as common to each other. They are not, and the merging of Nedlands East and Real Crawley in the term "neighbourhood" is misleading and strategically flawed thus leading to a strategically flawed precinct plan.</p> <p>As if to confirm these two areas are distinct and not "common neighbourhoods", the land values alone exhibit the distinction with Real Crawley being in the City of Perth always commanding higher land values than Nedlands East or "Faux Crawley", as it is often referred to. Our concern in not recognising such locational distinction is to affect the future "Urban Form and Character" found in the "Future Directions" recommendations for Crawley itself. This future direction proposal prejudices the inherent planning opportunities that may be released in a Real Crawley specific planning proposal.</p> <p>In that respect we have continuing concern:</p> <p>As if to contrast that approach of locational distinctiveness, we note that it is not consistent in respect of the other "neighbourhoods", such as the West Perth precinct (Fig 5.5), where a "prescriptive" land use and urban form hierarchy (Table 31) is established, being high scale mixed use >16 storeys to medium/high scale mixed use <16 and medium scale mixed use <12 storeys being noted and that these are only guides subject to further investigation. It's apparent this prescriptive approach in West Perth contrasts to the approach taken in the Nedlands /Crawley future directions approach. The Nedlands /Crawley approach simply recognizes "two activity centres" being south of Stirling Highway around Broadway and north of Stirling Highway being in and around Hampton Rd. The document referred to (CN1) 5.6.4 states the planning intent as (v) "Character</p>	<p>for the UWA-QEIMC Specialised Centre Precinct Plan, which is currently being prepared.</p> <p>Noted, refer to above response.</p> <p>The approach to the Crawley-Nedlands neighbourhood is different to other neighborhoods because it is subject to a separate planning process to prepare a Precinct Plan as required by <i>State Planning Policy 4.2 – Activity Centres</i>.</p> <p>The Specialised Centre Precinct Plan is currently being prepared by the City and its parameters are set out in Part 5.6 of the Local Planning Strategy.</p> <p>The Precinct Plan will address the detailed planning requirements (such as density, land use and public realm) for the neighbourhood and respond to the various character areas identified in the Strategy.</p>	<p>Nil</p> <p>Nil</p>

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			<p>ensuring buildings positively contribute to public realm and enhance the desired build form character of the neighbourhood.</p> <p>This "intent" statement seems to confirm the "existing planning status quo", rather than explore the planning potential and opportunity, further in 5.6.4 (iv). Neighbourhood priorities refers to ""refinement of existing" and/or the introduction of bonus plot ratio provisions to incentivise delivery. This also seems somewhat contradictory in that its intent is to confirm "refinement of the existing built form", but then talks about plot ratio bonuses to do what? Presumably "refine what exists".</p> <p>It does nothing to encourage new built form? It focusses on the existing status quo. Surely that is not delivering, nor encouraging planning change in the Nedlands /Crawley precinct to deliver the objectives of the Capital City Vision (Fig 4). It's our observation that in respect of existing buildings it is simply an "enhancement proposal", not a "regeneration strategy" and that is very concerning if the CoP is to advance it's planning scheme to meet tomorrows needs of a truly great city. Urban land use and built form in a future city planning scheme should be about setting a "regeneration agenda" but it appears to us it's more about an "enhancement agenda". Whilst we are not advocating planning revolution this "enhancement agenda", is extremely conservative. The problem with this "enhancement agenda", it traps existing built form condemning ageing property to its former planning schemes.</p> <p>Moreover, that does not meet the objective of the state government's infill principles, nor does it permit the growth in rateable property numbers to contribute to the City's need for a larger volume of properties to be able to levy it's rates upon a greater number of ratepayers. It simply relies as an economic model on levying higher rates on existing properties, which is a "pricing model", rather than a "pricing and volume model" which would maximize the City's income. The issue therefore is not just about planning per se but about the potential release of income generation opportunities in a greater number</p>	<p>The Local Planning Strategy provides an action to refine the City's existing planning controls or standards. The City acknowledges that while there are existing planning provisions which address this matter, there is a need and opportunity to review, improve or adjust provisions where necessary.</p> <p>The City's intent, as outlined by the Strategy, is to adopt a flexible approach to the new planning framework to allow for innovation and adaptation to meet changing social, economic, and environmental circumstances.</p> <p>Together with a review of the City's established planning controls and standards, the Local Planning Strategy establishes the introduction of built form provisions and investigation of plot ratio incentives to promote Environmentally Sustainable Design by achieving higher green star ratings.</p> <p>This will encourage the provision of design elements such as solar panels, water efficient fixtures, natural ventilation, heating and cooling as well as electric charging stations being implemented in all new developments.</p> <p>The Local Planning Strategy aims to exceed the State Governments infill residential development target (refer, 4.2.1 of the Strategy).</p> <p>Part 4.2.1 of the Local Planning Strategy stipulates that <i>"more people living as well as working and visiting Perth city will bring life to the city and improve its vibrancy. Increasing Perth city's resident base, will also provide greater economic support for local businesses especially at night and on weekends and help the city become more self-sustaining and resilient."</i></p> <p>The aspirational targets for each neighbourhood were determined by a capacity analysis, considering land availability, potential</p>	<p>Nil</p> <p>Nil</p> <p>Nil</p>

