

**RESPONSE TO CITY OF MELVILLE CONSOLIDATED SUBMISSION COMMENTS/OBJECTIONS**

**MJA – MJA Studio**

**HS - Hide Shigeyoshi (Tuscom)**

**VB - Vladimir Baltic (Transcore)**

**TP - Tim Philp (Floth)**

**SP - Steven Postmus (CAPA)**

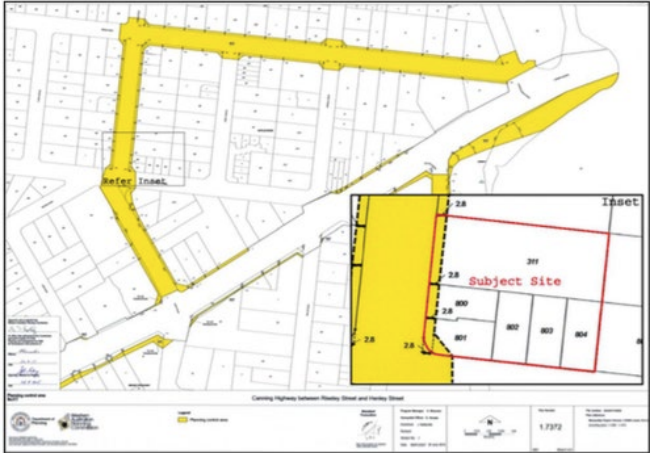
**JW - Jennifer Wroe (Talis)**

Comment Number	Responsibility	Objection	Response
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**CBACP related**

1	<b>HS</b>	The Lot size available for the development is below the minimum required for additional height bonuses	<p><b>HS - Disagreed.</b> The subject site is 2,023sqm in total which permits the consideration of additional height. The area that is the Planning Control Area (PCA) is included as part of the land area under the provisions of the Canning Bridge Activity Centre Structure Plan (CBACSP).</p> <p>It is worth noting that the PCA is in effect till 26 August 2020 or until revoked by the WAPC with approval by the Minister for Planning, whichever is the sooner.</p>
2	<b>MJA</b>	The design has not been classified as exemplary by the Design Review Panel (DRP)	<b>MJA - Pending</b>
5	<b>HS</b>	Disagree with calculation and composition of community benefits for height bonus is not in proportion to the community benefit and thus fails Element 22.1	<p><b>HS - Disagreed.</b> Firstly, the submitter/s do not specify as to how they disagree with the calculation and composition of</p>

			<p>community benefits for the height variation. Without an explanation, it is not clear whether the concern raised has been based on sound reasons or not.</p> <p>Notwithstanding the above, the proposal as submitted has provided conclusive information in the form of an Amenity Impact Statement and architectural Design Report which has outlined detailed evidence indicating that the proposal satisfies 7 out of 7 items of Element 21 and 7 out of 10 items of Element 22.</p> <p>Amended plans have also further refined the proposal to deliver additional design and community benefits, these summarised as follows:</p> <ul style="list-style-type: none"> <li>• Exclusive Community Hall added to Level 1 (188sqm)</li> <li>• Removal of all podium parking to basement</li> <li>• Significantly enlarged Community Garden</li> <li>• Additional public stair to Community Garden added to Kishorn Street</li> <li>• Increased peripheral podium landscaping</li> </ul> <p>Based on the above, the purported concerns are not considered to be justified.</p>
7	HS	<p>how can land ceded for road widening be included in the Lot size and therefore land ceded from the site reduces the lot size for construction to 1897sqm and zoned for a minimum 10 storey development.</p>	<p><b>HS</b> - The PCA is not the same as road widening that is typically reserved under the Metropolitan Region Scheme (MRS). That is, it does not require affected land to immediately surrender / ceded land for road widening.</p> <p>Rather, the subject PCA is land that the WAPC has simply declared important for the future road upgrading of <u>Canning Highway</u> to ensure that the highway operates effectively in the long term. In this</p>

			<p>instance, this allows the WAPC to ensure that development within the PCA is considered holistically in context of potential impacts with Canning Highway and its future operation. E.g. avoiding access / egress onto Forbes Road would be a relevant consideration to allow unrestricted movement of vehicles from Sleat Rd through to Kintail Road, all of which form part of the PCA – refer figure below.</p> 
14	<b>MJA</b>	Apart from allegedly exemplary design the proposal contains no community benefits to the Applecross community whatsoever.	<b>MJA</b> - Please see updated Design Report, submitted 30.01.19
18	<b>MJA</b>	The design is vague on how the amenities and features are actually going to benefit the whole community and not just those who live in the establishment.	<b>MJA</b> - Please see updated Design Report, submitted 30.01.19
29	<b>MJA</b>	Other than architectural quality and sustainable features for the site itself, the proposal offers limited other benefits and should be reduced to a maximum height of 15 storeys.	<b>MJA</b> - Please see updated Design Report, submitted 30.01.19

**Traffic**

<p>6</p>	<p><b>VB</b> <b>HS</b></p>	<p>Given there is no mention in the traffic report about the 10 bonus floors it is difficult for me to provide comment other than this Element has clearly not been addressed, let alone satisfied.</p>	<p><b>VB</b> - A typical floor comprises seven residential apartments and as such a total of 10 floors would account for approximately 70 units. Applying the assumed trip rates (refer TIS report for details), it is estimated that 10 bonus floors of the development would yield approximately 320 daily trips with approximately 37 and 22 AM and PM peak hour trips, respectively. This accounts for approximately 48%, 54% and 44% of total daily, AM and PM peak hour trips of the total development traffic generation.</p>
<p>8</p>	<p><b>VB</b> <b>HS</b></p>	<p>The pressures on parking and infrastructure in the area will be impacted significantly by the proposed 20 storey building.</p>	<p><b>HS</b> - Disagreed. The proposal will provide in excess of the minimum parking required under Element 18 of the CBACSP whilst not exceeding the maximum requirement. To this end, there will be no pressure on existing public parking infrastructure nor private properties in the immediate locality.</p> <p>With regard to infrastructure, requisite upgrades shall be undertaken to ensure that common infrastructure such as water, gas, sewer and electricity operate effectively. A minimum 5-star Green Star rating will also ensure that the proposals impact on infrastructure services is significantly less than a building of a similar scale.</p> <p><b>VB</b> – Hide has addressed this appropriately</p>

10	<b>HS</b>	Vehicle noise, disturbance and highway safety issues from extra traffic generation	<p><b>VB</b> – Based on the analysis presented in the TIS report the development proposal would have a negligible impact on Canning Highway in order of well below 1% of additional total daily traffic. The development traffic would access the highway via signal-controlled intersections and as such would do so in a safe and controlled manner. The traffic generated by the proposed development would access the site mainly via Canning Highway (regional road) and as such would have minimum impact on nearby residential areas. It typically requires doubling of traffic volumes on a road to produce a perceptible 3db(A) increase in noise. The proposed development is a moderate traffic generator however.</p>
11	<b>VB</b> <b>HS</b> <b>MJA</b>	Adequacy of parking / loading and turning for delivery trucks. As the proposed development has a number of different uses, no mention has been given to the various types of vehicles which may need to service the building and problems that will eventuate. A failure to also provide adequate disabled person access is another flaw to the design and discriminatory	<p><b>HS</b> - Disagreed.</p> <p>The proposal has been the subject of detailed review by the qualified traffic consultant who has determined that parking, loading and turning areas all satisfy the applicable Australian Standards.</p> <p>With regard to loading / service areas, the proposal has been provided with a loading bay which will provide for all servicing requirements including refuse collection which entails the largest vehicle type. Any other service vehicles can adequately operate within the area assigned.</p> <p>With regard to disability access, the proposal has been reviewed by a qualified building certifier (Today's Building Services Pty Ltd) who have endorsed the proposal as satisfying all disability requirements under the relevant Australian Standards.</p>

			<p><b>VB</b> – A turn path assessment plan attached in the TIS report shows safe access, egress and internal site manoeuvring of a maximum size service vehicle expected to access the site. Any vehicle smaller than the design service vehicle would also have no problem operating within the site. Furthermore, the service vehicle is only expected to access the site several times a week. No operational issues are therefore anticipated.</p>
13	<p><b>VB</b> <b>HS</b></p>	<p>Traffic generation for this development will have a significant negative impact on the traffic flow through the Canning Highway and Sleat Road areas with ripple through effects back onto Kintail Road at peak periods.</p>	<p><b>VB</b> - Disagree. The proposed development is a moderate traffic generator. Refer TIS report analysis and conclusions.</p>
20	<p><b>VB</b> <b>HS</b></p>	<p>The traffic model (page 9) shows all of the peak traffic that heads east along Canning Highway doing so via Kintail Rd. Even though this project is situated on Forbes Road, there are no cars using Sleat Road to access Canning Highway east. This is not logical.</p>	<p><b>VB</b> - Disagree. The assumed trip route is almost exactly the same in length as the alternative route suggested by CoM but results in bypass of a set of traffic signals and consequentially results in reduction in overall travel time.</p>
21	<p><b>VB</b> <b>HS</b></p>	<p>There is no consideration given to the CBACP road changes. Kintail Road (where the modelling shows the majority of traffic for this project is going) is to become a Public Transport Boulevard and intended for local traffic only. IF the model provided is correct then surely this needs to be considered together with the traffic impacts from the Sabina project which will have all traffic accessing Kintail Road.</p>	<p><b>VB</b> - The majority of traffic associated with the proposed development would in fact be “local traffic” as the development is in its nature a residential development. The assessment of the traffic impact of the proposal on the wider area is well beyond the typical Transport Impact Statement scope which is appropriate for the proposed development.</p>
22	<p><b>VB</b> <b>HS</b></p>	<p>The traffic model references existing traffic count numbers sourced from City of Melville. This would imply there is no consideration given to the numerous other developments under construction and consideration that will have significant impacts to both Kintail Road and Sleat Road traffic congestion.</p>	<p><b>VB</b> – Refer previous comment regarding TIS scope.</p>

24	<b>MJA</b>	Basement Car Park. The three level basement car parking requires an enormous amount of mechanical ventilation and the 'wind scoops' concept that is shown is questionable.	<b>MJA</b> - The passive wind scoop ventilation has been designed to assist but not replace active mechanical ventilation. Designed in conjunction with our Mechanical consultant the wind scoops will help to reduce the extent of power use for basement carparking ventilation. The proposed hybrid system has been designed to meet the requirements of the NCC and meet relevant Australian Standards.
25	<b>VB</b> <b>HS</b>	The Transport Impact Statement's suggestion that the traffic impact of the proposal on the surrounding road network will be insignificant is very short-sighted.	<b>VB</b> – Disagree. Refer previous comment regarding TIS scope.

### **Height**

3	<b>HS / MJA</b>	The zoning on the opposite side of Forbes Road is limited to 4 storeys and there will be no gradual integration or blending of the building heights as intended by the overall design of the Canning Bridge Activity Centre Plan (CBACP). The proposed building is across the road from a four (4) storey zone and the change in height levels is not gradual as originally planned for the high-rise development in the area, where the centre of the area is highest at fifteen (15) storeys and gradually decreasing in height towards the single residential areas.	<p><b>HS</b> - Disagreed.</p> <p>Under the provisions of the CBACSP, it proposes the M10 area to be designed based on a maximum 13.5m podium level, leading up to a maximum height of 10 storeys / 32.0m.</p> <p>The proposal features a podium height of 10.6m which is well within the maximum allowable and importantly, creates the foundations of the <i>pedestrian scale</i>, in conjunction with the various hard and soft architectural elements. <i>Pedestrian Scale</i> means “...the use of human proportioned architectural features and site design elements clearly oriented to pedestrian activity. Such elements are typically smaller in scale and more proportional to the human body, rather than</p>
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			<p><i>monumental or large scale, and include surface texture and patterns, lighting, colors, materials, and architectural details” (City of Rushton Zoning Ordinance, 2019).</i></p> <p>In this instance, whilst the overall building exceeds the base height criteria, it is still considered to result in an acceptable transition in building typology due to the following reasons:</p> <ul style="list-style-type: none"> <li>• Pedestrian scale is achieved through the expression of the first three levels as a planted façade that connects the street trees to the vertical gardens.</li> <li>• The podium height at 10.6m and building above which is setback from the street boundary effectively minimises the visual bulk of the 20-storeys due to the basic science of peripheral vision and human eye-level limiting any direct line of sight to anything above a podium height.</li> <li>• The built form which is divided into three rounded clusters not only maximises street setbacks but it also significantly reduces building bulk thereby ameliorating any adverse impacts of a 20-storey building abutting a 4 storey area.</li> </ul> <p>Further reasons in support of the proposed building are contained within the accompanying architectural Design Report and Amenity Impact Statement.</p>
9	<b>HS</b>	Loss of light, overshadowing and privacy. The proposed building is across the road from a four storey zone and the change in height levels will be too confronting and not gradual as originally planned for the high-rise development in the	<p><b>HS</b> - Disagreed.</p> <p>Fundamentally, the R-Codes considers overshadowing based on a buildings ability to overshadow a neighbour at midday, mid-winter. To this end, the four-storey</p>

		<p>area, where the centre of the area is the highest at fifteen storeys and gradually decreasing in height towards the single residential areas.</p>	<p>areas which are located due-west of the subject site will not be affected.</p> <p>By way of privacy / overlooking, the CBACSP excludes these requirements which would otherwise apply where the provisions of the R-Codes or Draft Design WA are applicable. Whilst requirements do not apply, the CBACSP addresses privacy separation by way of boundary setbacks between buildings. In this instance, the proposal features compliant side setbacks which will ensure that a appropriate level of separation is achieved between buildings and associated major openings to mitigate the impacts of overlooking.</p>
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**Other**

4	HS	<p>The building will establish a precedent which will result in the density in the CBACP being exceeded by more that 200%.</p>	<p><b>HS - Disagree.</b></p> <p>The CBACSP has been structured in 3 key sections as outlined in the Amenity Impact Statement. That is, a proposal is initially assessed against the <b>Requirements</b>. Where a proposal does not satisfy the <b>Requirements</b>, consideration is made against the <b>Desired Outcome</b>. Additionally, variations to height are subject of further scrutiny against the various criteria contained under <b>Elements 21 &amp; 22</b>.</p> <p>This tiered approach and level of scrutiny will ensure that every proposal is the subject of detailed assessment and the exercise of discretion, where applicable. Put simply, future proposals will not all result in variations and the granting of additional density as a result of the subject proposal.</p>
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12	<b>SP</b>	The trees in Applecross should protect as the tall buildings will cast shadows on the trees and this may kill them through lack of the sun.	<b>SP</b> - The tree selection has taken into consideration the location of the trees to the south. These trees can accommodate some shade and also the incidental solar reflections from the glass that will occur.
15	<b>MJA</b>	These are not local homes for local people	<b>MJA</b> - Disagree. The building is not only a well-considered response to Applecross and its surrounding environment, but it confronts the issue of density in an innovative and thoughtful way, providing a wide variety of apartment types and sizes.
16	<b>HS</b> <b>MJA</b>	The short stay apartments proposed for the building. Apartments already lend themselves to a more transient population; short term lets will add to this culture and reduce the community feel of the area.	<b>HS</b> - Disagree. Whilst it is agreed that short-stay apartments have transient occupiers, this in itself does not result in the loss of 'community'.  Community itself is created by people and the fundamental principle guiding the CBACSP is to increase population density in the area due to its proximity to existing and future services. The proposal will significantly add to the level and quality of services available in the area thereby creating a focal point for people to converge. The short stay apartments will add a service to the locality which can be utilised by tourists as well as visitors who are friends or family to occupants of the proposal or those who live nearby. To this end, the use itself does have an inherent community benefit.  The fact that the proposal has also embraced the landscape elements of Applecross in its design is considered to further strengthen the community based aspect of the proposal.

17	<b>HS</b>	Associated street widening will remove an avenue of established trees.	<b>HS</b> – Not a relevant consideration. The purported street widening that is assumed as part of the PCA is not proposed as part of the subject development. The PCA has been applied by the WAPC and as such, any loss of existing street trees will be the result of the WAPC and other relevant government authorities.
19	<b>HS</b> <b>SP</b> <b>MJA</b>	Building Façade. Given it is a requirement that the community benefit be guaranteed into the future and I do not believe that our climate will support such plantings and will place considerable financial burden on the community for its maintenance/replacement.	<b>SP</b> – The incorporation of planting to the building façade is a trellis planting system only, with dedicated horizontal planters being provided (i.e not vertical soil/planting medium arrangement)  The planting selections are also typical of vine plantings that can be found in Perth’s suburbs, which provide mass cover to suburban back and front fences. Due to the robust nature of these plants, these plantings are also contained in purposed planters for this purpose only.
23	<b>MJA</b>	Prevailing winds and storms. Recommendations have been made in the document for essential wind tunnel testing to be carried out. This has not been done	<b>MJA</b> - The wind report outlines a number of treatments which would enable suitable wind conditions to occur.  We would seek to engage with the consultant further during detailed design to ensure his recommended wind amelioration measures or similarly effective alternate measures could be integrated into the buildings design.
26	<b>JW</b>	Waste management plan. With only ONE chute servicing an arrangement of these fourteen 600 litre bins the practicality of manually checking and shunting these around as they become full, seems unrealistic.	<b>JW</b> - The chute system services residential apartments only, requiring 8 bins. Based on the estimate generation rates for residential apartments it is estimated that no more than one 660L refuse bin and one 660L recyclables bin would require swapping each

			<p>day. There is scope within the WMP for utilisation of automated track system and sensors to alert the caretaker if bins are full.</p>
27	<p><b>TP</b> <b>MJA</b></p>	<p>Service infrastructure. Item 7.3 of the CBACP has highlighted some of these services as 'end of the line' scenarios and in need of substantial system upgrade. In the proposal for this development there is no mention of these services (water, waste water and power) other than the proponent is mentioning PV cells on the roof top to reduce reliance on existing power network.</p>	<p><b>TP</b> - In regards to power availability and consumption, from liaising with Western Power and previous experience within Applecross/Mount Pleasant/Canning Bridge area, we are confident to proceed with the available HV capacity to supply the proposed development on the corner of Forbes and Kishorn Road. Given current information, we assume the area has approx. &gt;20MVA spare capacity on the Western Power infrastructure. The design proposes a 1MVA district substation to supply the site with available capacity to supply adjacent lots and street lighting and power requirements, as required by Western Power.</p> <p>The mention of a PV-Array on the roof was to enforce the sustainable and "Green" direction the development is ensuing. We expect during daylight hours, majority of the power consumption of the site will be offset by the PV array, significantly reducing the developments carbon footprint.</p> <p>From a hydraulic point of view we calculate our demand for water &amp; sewer and submit an application to WCWA for the respective connections to the new development. In regards to the mains infrastructure such as WCWA water/sewer/stormwater mains or ATCO gas main, Floth provide the civil engineer with in-ground connection details and loads for confirmation that sufficient capacity is available within the existing infrastructure. Water corporation or other governing bodies will complete any necessary upgrade works</p>

			should they be required to allow growth in the region and to compensate future developments.
28	<b>HS</b> <b>MJA</b>	That the proposal is completely out of character with the ambience of the surrounding area	<b>HS</b> – Disagreed. For reasons outlined above and as detailed in the accompanying architectural Design Report and Amenity Impact Statement, the proposal is considered to represent an exceptional built form outcome for the locality and positively contribute to the overall CBACSP.