



Local Planning Policy 3.1

Tabled Submission Report September 2025



City of
Melville

Summary

At the May 2025 Ordinary Meeting of Council, Council resolved to advertise proposed amendments to Local Planning Policy 3.1 – Residential Development (LPP3.1), with outcomes to be reported back. To ensure transparency and broad community awareness, the consultation period was extended well beyond the minimum 21-day requirement, running for 62 days.

The review of LPP3.1 and Local Planning Policy 1.9 – Height of Buildings (LPP1.9) provided an opportunity to consolidate the two policies into a single, comprehensive framework. As part of this process, LPP1.9 will be rescinded, with its key building height provisions incorporated into LPP3.1.

The amendments aim to simplify the planning framework, align with State Residential Design Codes, and improve clarity, design quality, and residential amenity by rationalising building height controls. Public consultation was open from 15 July to 15 September 2025, promoted through Melville Talks and other communication channels.

A total of 24 submissions were received. Engagement outcomes indicated mixed views: while there was strong support for environmentally sustainable design and policy simplification, the majority of submissions opposed the proposed height amendments, citing concerns about amenity, consultation transparency, and infrastructure capacity.

Communication and Participation

How we communicated	How we engaged	Participation and reach
<ul style="list-style-type: none"> • CoM webpage • Direct email to a Melville Sounding Board, random community sample, stakeholders and industry professionals • eNews publications (Melville Talks and Melville Matters) • Perth Now, Melville • Social media 	<ul style="list-style-type: none"> • Online submission form • Hard copy submission form • In person at CIVIC Building • Over the phone 	<ul style="list-style-type: none"> • 24 submissions received • 1,240 Melville Talks webpage views • 2,309 direct emails issued <ul style="list-style-type: none"> ○ 1,987 community sample ○ 265 Melville Sounding Board ○ 58 Industry professionals • 18,815 eNews subscribers <ul style="list-style-type: none"> ○ 12,741 Melville Matters ○ 6,074 Melville Talks • 9,478 Social media views • 25,016 newspaper distribution

Engagement Findings

Submission Outcomes
n24 submissions received

Oppose	Support with concerns	Support	Neural no position
58% n14	17% n4	17% n4	8% n2

Submissions highlighted strong support for sustainable design and greening measures, but raised significant concerns regarding building height reductions, transparency of consultation, and the capacity of local infrastructure to support future growth.

Theme / Issue	Key Points Raised	Frequency/Sentiment
Sustainability & Design	Strong support for environmentally sustainable design, deep soil areas, tree canopy, shade, and walkable neighbourhoods. Concern that ESD is not embedded as standard practice.	High support
Building Heights	Mixed views: some support alignment with R-Codes; many oppose reductions, citing loss of flexibility, design quality, and inconsistency with existing built form.	Mixed. Some highly concerned of the impact of building height provisions, whilst others strongly supporting building height clauses within proposed LPP3.1.
Density & Growth	Support for sensible infill and higher density to meet housing needs, but counterviews about congestion, overshadowing, and poor fit with local character.	Mixed
Amenity & Infrastructure	Concerns about parking, traffic congestion, road safety, and pressure on schools and community facilities.	Frequent concern
Consultation & Transparency	Changes promoted as “amalgamation” but materially altered height settings. Requests	Strong concern

	for clearer communication, tracked changes, and layperson summaries.	
Policy Approach	Criticism of “one-size-fits-all” rules. Calls for place-based planning (riverfront, flood-prone, or character precincts).	Several submissions
Short-Stay Accommodation	Safety and amenity issues raised in relation to short-term rentals in high-rise areas (e.g. Applecross, Mt Pleasant).	Some submissions
Implementation / Timing	Requests for transitional arrangements to avoid penalising projects already underway.	Some submissions

Tabled Comments

The following comments are presented as submitted, with identifiable personal information replaced with [removed].

Number	Level of support	Comments	CoM Officer Comments	CoM Officer Recommendation
1	Support with concerns	I want to see environmentally sustainable development, I want to see more focus on innovative ideas to develop property like co-housing and intentional communities. The high rise that has been built at Canning hwy is a concrete jungle - I do not see any sustainable design principles. Sustainable design should be the norm not the by exception. Buildings that are energy efficient, beautiful, with lots of plants and creates communities - not just a whole lot of apartments.	Comments made through this submission are not relevant to LPP3.1 - which is applicable to low density residential development.	Not uphold
2	Support with concerns	The changes may be beneficial, but unless the City changes it's arrogant non-helpful attitude it simple won't matter.	Comments made through this submission are not relevant to LPP3.1	Not uphold
3	Neural no position	The multi storey apartment dwellings & in fill housing that has already occurred along the Canning Highway Transport Corridor are not in keeping with the area & parking, roads, schools & other public amenities have not been upgraded or increased to keep pace with the increased demand. Resulting in increased stress & poorer life quality for existing & new	Comments made through this submission are not relevant to LPP3.1 - which is	Not uphold

		residents. Pt Walter Rd, Fifth St & Murray Rd are dangerous 1 car width car parks at times.	applicable to low density residential development.	
4	Support with concerns	I support sensible infill, I can not see anywhere in your LPP where you have guaranteed a specific amount of deep soil space to allow for a tree, or space on verges for a path and verge tree. If we are going to increase population, we have to make it a walkable city. Walkable cities require shade. Please regulate planning around existing trees like Sydney has been successfully doing for decades.	Landscaping and deep-soil planting space requirements are captured by the R-Codes and are not proposed to be modified by this policy.	Not uphold
5	Support with concerns	My concern is the timeline building and development takes to complete with some residential homes.	Comments made through this submission are not relevant to LPP3.1.	Not uphold
6	Neural no position	I am puzzled that the city is not working towards zoning changes to increase the number of residences in the area. Melville contains one of the busiest hospitals in the country and will soon have another large hospital on that site. Local schools have capacity to take more students. Local businesses have capacity to serve more residents. Property prices will motivate high quality private investment/subdivision. I agree with your action to reduce building heights to the standards in the R codes.	Comments made through this submission are not relevant to LPP3.1 - which is applicable to low density residential development, rather than zoning changes	Uphold concerns made relevant to LPP3.1 provisions
7	Oppose	I see no steps or changes to improve the Quality of residential housing in the changes. There is no improvement in the design specifications or requirements. There is no improvement in the requirements to have green spaces including spaces for trees with deep root areas. Every home that is destroyed has resulted in multiple house boxes of a very ordinary design quality. The City of Melville claims these simplified requirements will enable better quality of housing. There is no evidence .	Landscaping and deep-soil planting space requirements are captured by the R-Codes and are not proposed to be modified by this policy.	Not uphold
8	Support	I endorse the proposed changes to building heights to the same as those applicable under the R-Codes.	Noted.	Uphold
9	Support	None	Noted	Uphold

10	Support	I support the proposed building height modification.	Noted.	Uphold
11	Support	I support the proposed building height modification.	Noted.	Uphold
12	Oppose	<p>The following non-exhaustive feedback is:</p> <ol style="list-style-type: none"> 1. The substantive editing changes to the text of the existing policy makes it very difficult to properly track changes made. The tracked version of the current LPP3.1 with proposed amendments was not provided to the broader community. This was specifically requested from the City, as attached. There is great concern that minor unnoticed changes to the text may cause unintended, or perhaps wilful detriment to residents when tested in courts. This concerns is supported by the MSUP's report statement "Simplify the City of Melville's planning framework and ensure no ambiguity in terms of consistency with recent decisions made by the State Administrative Tribunal (SAT) and Supreme Court in relation to local frameworks being inconsistent with the R-Codes." 2. The R-Codes and local planning policies are complex topics and possibly difficult for the typical residents (including many Elected Members) to properly comprehend to make fully informed decisions. There was a lot of cross references to LPS6 and R-Codes, not provided and difficult to confidently find. Council and community would benefit from leveraging experienced and knowledgeable residents through and detailed interactive workshop review facilitated by the City's planning officers. This approach would be confident with the heralded success of the CBACP CRG that has been a successful and valuable contribution to Council and the community. Council should not accept the proposed changes to this significant policy until the City planning team complete a facilitated community engagement workshops in the same manner as what happened with the CBACP CRG. It is noted that changes to LPP 3.1 will likely relate to and impact more residents that that live in the CBACP and adjoining areas. 3. MSUP's report does not contain any information on the potential impact of the proposed changes or any indication of the benefits. Council should consider all impacts/benefits before making decisions. 	<p>The City notes that consultation/community engagement was conducted above the statutory requirements of the Planning and Development Regulations. Interactive workshops/engagement sessions with the community far exceed the requirements of the PD regulations, and engagement undertaken by the City across a range of recent LPP amendments.</p> <p>Concerns regarding inconsistency between in the proposed policy to LPS6 (and future amendment to LPS6) can be easily rectified through administrative updates to LPP3.1.</p>	<p>Not uphold concerns regarding process of advertising, screening structures constituting boundary walls.</p> <p>Uphold comments made regarding street setback provisions, which will now be proposed to be retained in LPP3.1.</p>

	<p>4. MSUP's report states "Table 7 within Local Planning Scheme no. 6 (LPS6) provides built form development standards for non-residential zones, which includes specific building heights for each zone.". "An additional clause has been included to confirm that this policy is made under the relevant provisions of the Planning and Development (Local Planning Schemes) Regulations 2015 and City of Melville LPS6.". "The policy scope has been updated to note the minor changes in relationship between LPS6, the R-Codes and LPP3.1. This confirms in what instances LPP3.1 is applicable, any relevant R-Code clauses modified by LPP3.1 and when a performance assessment against the design principles is required." LPS6 is currently under review https://www.melvillecity.com.au/our-city/connect-with-us/melvilletalks/community-engagements/local-planning-scheme-6-review for which there is significant community objection to the proposed changes. There is little information provided in the MSUP's report to clearly and fully detail interactions between LPS6 (current and proposed) and proposed LPP3.1. There may be suspicion that the LPP3.1 may progress some of the intended LPS6 planning criteria changes by the back door. It may be premature to amend LPP3.1 until LPS6 review is concluded.</p> <p>5. More information is required to properly understand MSUP's statement " The City also recommends that R-Code provisions currently modified under LPP3.1 are to be repealed where they are more restrictive than the DTC of the R-Codes to remove any ambiguity noting the Supreme Court case McComish v Shire of Peppermint Grove (2024) which determined that Local Planning Scheme provisions (and hence local planning policies which are of lower hierarchy) cannot be more restrictive than the DTC of the R-Codes, given works that comply with the DTC of the R-Codes is exempt under Cl.61 of the Planning and Development (Local Planning Schemes) Regulations 2015."</p> <p>Amongst other things this appears at odds with the City's response to Councillor questions "Question 2: The Supreme Court ruling from 2022 regarding LPPP not being able to be more restrictive than R-Codes –</p>		
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		<p>where is there scope for the City to introduce provisions to improve amenity? Response 2: This proposed policy is to reduce ambiguity in how policy is interpreted for both officers and applicants, but is yet to be fully tested in all context. However, it is the Council’s decision to move alternative motions to retain current provisions.” The perceived ambiguity could be explained by the City’s planners at community review at an interactive engagement workshop with experience and interest community members. 7 July 2025 DAU minutes (UP25/82) relating to 50 Blackwall reach Pde Bicton</p> <p>Rhttps://www.melvillecity.com.au/getattachment/04abf767-8285-442e-8d69-2d98b3cf3e79/dauminutes-7-july-2025-(1), (it is noted the CEO attended the DAU meeting) in which heights was an issue, adversely impacting views of significance for an adjoining property. It is not clear how the proposed LPP3.1 changes will stop City CEO / planning officers’ discretion to approving heights above the stated limits</p> <p>6. Current LPP3.1 Section 6 relates to Boundary Walls. This section was substantially kept in the proposed version, including the statement “Boundary walls, retaining walls and vertical screening structures shall be finished to the satisfaction of the City.” However, C3.5 was removed. The MSUP’s explanation of the proposed change was “Remove C3.5 within Clause 6 in relation to vertical screening structures being considered boundary walls. All other modifications in Clause 6 are proposed to be retained.” This is not justification for the proposed significant change. This is the type of subtle that may cause even more disputes between neighbours; potential suburban civil wars (residents have suffered (including assaulted) over such things. This is an example of the lack of information provided in the MSUP’s report and alone should justify the need for Council directing the CEO to undertake interactive engagement review workshops with experienced, knowledgeable and interested community members in line with the CBACP CRG approach. The proposed removal of C3.5 should be rejected due to lack of adequate justification.</p>		
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		<p>7. The proposed LPP3.1 appears to remove significant criteria for Street Setback, with the justification "To be removed and default to the DTC of the R-Codes." This is an inadequate justification to remove what currently significant restrictions that protect the streetscape and amenity. Removal of criteria such as: "The Deemed-to-Comply provisions of Clause 5.1.2of the R-Codes are replaced with the following: C2.1 Buildings, excluding carports, unenclosed porches, balconies, verandahs, or equivalent, set back from the primary street boundary:</p> <ul style="list-style-type: none"> I. in accordance with Table 1; or II. corresponding to the average of the setback of existing dwellings on each adjacent property fronting the same street; or III. reduced by up to 50 per cent provided that the area of any building, including a garage encroaching into the setback area, is compensated for by at least an equal area of open space that is located between the setback line and line drawn parallel to it at twice the setback distance (refer Figure 2a and 2c);" <p>should be rejected, amongst others, due to the potential significant adverse impacts.</p> <p>8. Feedback and opinions above are made good faith based on information available to assist Council in improving community members participation in the decisions and the affairs of the City and to assist Councillors to make proper and proficient decisions in the best interest of the community and any individual residents those Councillor are elected to represent. It is noted council legally obligated to make its decisions based on evidence, on the merits and in accordance with the law</p>		
13	Oppose	<p>B and Bs, short term rentals whatever terminology you want to use should not be part of all the apartments being built in and around Mt Pleasant and Applecross. Nor should it be part of houses or duplexes in these suburbs.</p>	<p>Comments made through this submission are not relevant to LPP3.1.</p>	<p>Not uphold</p>

	<p>There is enough trouble that has been created in these areas since the train line was approved and a train stop was erected on the bridge in Applecross.</p> <p>An example is the apartment block called Canning Bridge Auto Lodge where visitors stay for a night or a week. Canning Bridge Auto Lodge attracts violence, drugs and alcohol induced people who cause problems for the area making it not safe to walk.</p> <p>It was only a few years ago where a person had their hand cut by a machete from a male person who was staying at the Canning Bridge Auto Lodge. This was a reminder of what the area is becoming like to live in. These issues and problems are still happening today and will continue. The ACT needs to change for the safety of the people and short – term accommodation will just create more problems.</p> <p>Rentals are that cheap in parts of Mt Pleasant and Applecross due to ongoing building and development of Apartments that again we are finding that houses and or duplexes are rented to people who are destructive and consume a lot of alcohol and drugs. Wren Street, Helm Street are examples of this.</p> <p>If you don't take control now you will loose total control in both Applecross and Mt Pleasant and you will see people continuing to leave and live elsewhere. No point having amenities if you can't enjoy them because of the lack of safety.</p> <p>Visitors to Mt Pleasant and Applecross ask about the crime and safety as they too feel unsafe to ride their bikes around the river as there are gangs of youths hanging around the river who have thrown bottles at them whilst riding their bikes.</p> <p>I along with many don't walk to the local or walk on summer nights as the areas have become too unsafe. Unfortunate for the existing eateries and bars and any that may open in this area. Unfortunately there haven't been</p>		
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	<p>any eateries open since all the high rises have been developed as no potential restaurateur will lease in Mount Pleasant as there is no parking for their customers. Hence why many apartments owners are not impressed.</p> <p>Unfortunately City of Melville's focus on the environment has not stood up when you view what has happened in Wren Street with multiple apartments in the street obstructs the sunlight for people facing north. So much so that you may as well finish the street off and make the whole street 8 Storey. Melville Council stipulates if you decide to build it needs to be designed to allow natural sunlight in. All houses facing north are in shade due to the 8 Storey developments. Trees are dying, lawns are dead and birds are no longer around like they use to be. Solar systems on the roofs have stopped working as they don't get the sun.</p> <p>The theory of a cascading effect with one side being 8 storey and the other side being 4 storey has not worked. The heights are too out of proportion and the damage to the houses facing north has been done. The price rise of a house in Wren Street over the past years has not gone up percentage wise in actual fact they have dropped in price.</p> <p>Now with the second high rise nearly complete in Wren Street it is now clearly visual for the people who could not see what damaging effects the outcome of rezoning and putting apartments in a small narrow street was going to cause.</p> <p>You may as well balance the street out and zone it all 8 storey and get those apartments built and infill happening because today Wren Street looks like a job half done.</p> <p>Let's not forget about the influx of traffic this development has caused on this tiny narrow street. The rise in the amount of cars along with traffic jams and road rage in this street is out of control. You now have the Presbyterian Church in Ullapool Road that has got approval for a 1012 square metre block next door to the church to be turned into a car park for church people only. Extra traffic driving up Wren Street as the Church is</p>		
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		growing in number. It's a no brainer that Wren Street should be a cul de sac and being closed at the corner of Wren and Ullapool Road. It's a shame that Mount Pleasant's reputation has deteriorated and many look elsewhere when looking to purchase or lease a property. Mount Pleasant was once a highly regarded leafy suburb when I first bought here but today that is not the case.		
14	Oppose	misleading comms on content/intent of changes	Not enough detail provided for action and not relevant to the policy content	Not uphold
15	Oppose	<p>This submission is presented in response to the amendments proposed to Local Planning Policy 3.1 by the City of Melville. The suggested reduction in deemed-to comply building heights raises substantial concerns regarding its impact on community character, architectural quality, and equitable development opportunities.</p> <p>We strongly oppose the proposed amendments to LPP 3.1. These amendments introduce a reduction in building height allowances that will have the following material consequences for residents:</p> <ul style="list-style-type: none"> • The proposed reduction in building height allowances by 0.5–1 meter threatens the visual harmony and established character of suburbs such as Applecross, Mount Pleasant, and Bicton. These areas have evolved under existing height parameters that support continuity and fairness. Altering these limits risks creating homes that are out of scale with their surroundings, undermining the cohesive streetscape and neighbourhood identity. • Many properties in the City of Melville are situated on sloping terrain or within flood-prone zones. The proposed policy offers minimal concessions for such conditions, potentially imposing costly site modifications or requiring discretionary approvals. Retaining current height allowances ensures a more adaptable and 	<p>Concerns raised through this submission are addressed through incorporation of additional housing objective P6.2, which considers site topography and environmental factors where discretion is sought for additional building height.</p> <p>R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building</p>	Not uphold

		<p>resilient planning framework that respects the diversity of site conditions</p> <ul style="list-style-type: none"> • Restrictive height limits can stifle architectural creativity, leading to uniform and uninspired designs. The existing policy enables features such as higher ceilings, split-level layouts, and varied roof forms. These are elements that contribute to superior design quality and livability. Preserving these allowances encourages innovative, context-sensitive architecture that enhances the built environment. • A significant concern is the lack of clear communication and public engagement regarding the proposed amendments. The changes were presented as a consolidation of existing policies, yet they include material reductions in building height allowances. This has led to a widespread unawareness among residents and professionals, indicating a shortfall in the consultation process. The Council should undertake a renewed and comprehensive consultation initiative that transparently outlines the proposed changes and their implications. Such consultation must address the concerns that have been brought to light. Stakeholders deserve the opportunity to provide informed feedback on policies that affect their property rights and neighbourhood character. <p>The proposed amendments have the potential to disrupt established character, design quality, and equitable development. Any local planning policy amendments must retain flexibility, support good design, reflect comparable standards to the existing build environment and accommodate the diverse conditions across the City of Melville.</p> <p>The Council must reconsider its proposed amendment and address the significant and material concerns outlined within this submission.</p>	<p>heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for three storey developments where design merit is considered and where contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p>	
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16	Oppose	<p>We are long standing residents of the Melville Council area and we welcome the opportunity to comment on the proposed changes to the local planning policies that govern the building of homes by residents and rate payers of the Melville Council. My submission outlines a number of material concerns that need to be understood and addressed through proper consultation.</p> <p>We have identified material policy elements that require further examination. We have also identified issues in relation to the process of consultation and advertising that has taken place. These material policy elements and issues in relation to the consultation must be addressed before the Council can duly perform a proper and thorough assessment of the changes proposed to its local planning policies.</p> <p>The key matters identified within this submission include:</p> <ul style="list-style-type: none"> • Failure to properly consult on key elements of the proposed planning policy changes – Council must observe proper process and not undertake significant policy changes in the absence of this. • Proposed changes represent a significant reversal in the Council’s planning policies – such changes are out of step with the times, do not foster sustainable outcomes, do not have broad community support, and are at odds with the existing direction of development. • Restraints on development and density that would otherwise bring vibrancy, enhance community and support the economic development of beneficial community amenities – this should not be denied. • Proposed changes that are counter-productive to achieving the Council’s required density level to meet the future needs of its growing population. 	<p>R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for three storey developments where design merit is considered, and where contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and</p>	Not uphold
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		<ul style="list-style-type: none"> • A 'one-size-fits-all' approach that is not appropriate and fails to take account of specific locational-based factors, many of which are outside residents' control. • Proposed planning policies that inhibit the development of the prestigious locations which should be allowed to benefit from architectural designs befitting of their location, to showcase, uplift and maintain the prestige and desirability of the premium suburbs of the Melville Council. • Proper consultation and community awareness of the key proposed changes to important Council policies is required – otherwise the Melville Council may be exposed to a wide range of challenges. <p>An investigation of the concerns outlined within this submission must take place. The significance of such changes requires a proper, thorough assessment and the Melville Council must not make a final decision until due process has been observed.</p> <p>1. Failure to adequately advertise and make community aware of key proposed planning policy changes</p> <p>A key issue identified is what has been advertised as an amalgamation of LPP1.9 and LPP3.1. On closer inspection, we have identified that the proposed changes in fact seek to abolish and remove the existing 'deemed to comply' building height allowances that exist within LPP1.9. This is not widely known or understood by the Melville Council community, and it does not simply represent an amalgamation of LPP1.9 and LPP3.1, as has been advertised.</p> <p>Local governments are elected by the people of their council areas. Local governments have a responsibility to govern and make decisions that reflect the best interests of the constituents they represent.</p>	<p>Development Regulations.</p> <p>Concerns raised regarding residential densities are not relevant to this policy, which only considers built form standards for lower density residential development.</p>	
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	<p>To do this, proper consultation and awareness within the community of key changes to important council policies – such as home building planning policies – must occur through clear and transparent advertising and consultation process. As detailed below, this requirement has not been met for certain, very important facets of the proposed changes.</p> <p>The broader Melville community must have an opportunity to provide input and have their say.</p> <p>The consultation undertaken by the Council advertises the proposed changes as an ‘amalgamation’ of LPP1.9 and LPP3.1. The Council’s website states, “As part of this update, LPP1.9 would be rescinded, with key building height provisions incorporated into LPP3.1.” This is misleading. Melville residents and rate payers are led to believe that the LPP1.9 building height provisions will simply be ‘incorporated’ into LPP3.1. This was our initial understanding and a belief held by other ratepayers whom we know, however this is not the case.</p> <p>Should this proposed change take effect, it would reduce the Council’s ‘deemed to comply’ building height allowances by around 1 metre in most cases. This would have a significant impact for many proposed and future home developments in the Council area.</p> <p>The proposed changes are certainly not stated clearly and do not reflect what is published on the Council’s ‘Community Engagement’ page, which advertises a simple ‘amalgamation.’ An extract below taken from the Melville Council’s Community Engagement page that advertises the amalgamation is provided to demonstrates this.</p> <p>The abolishment and removal (rather than amalgamation) of the current LPP1.9 building height allowances cannot be identified until the detailed PDF documentation is downloaded and then cross-referenced back to complex State Planning R-Codes (which also need to be downloaded and interpreted).</p>		
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		<p>Such an exercise, to download and decipher what are complex planning rules and documents, cannot be expected to be an easy or reasonable task for the typical resident or ratepayer. It is the role of the required advertising and consultation process to make such matters known, to provide the community with an opportunity to comment.</p> <p>Such failing raises material concerns in relation to the transparency and accuracy of the advertising and consultation being undertaken by the Council. The proposed changes are not a simple amalgamation of two planning policies (as advertised) but instead see the removal of a key planning policy in relation to 'deemed to comply' building height allowances.</p> <p>These concerns are further evidenced by the fact that professional town planners, who specialise in this area of planning, have had no knowledge of the proposed abolishment 4 of LPP1 .9 building height allowances. Similarly, local real estate agents and builders who are active within the Melville Council area are also not aware.</p> <p>The effect is that the proposed changes have not been properly advertised, are not well known and, to some degree, are occurring by stealth. The local community deserves the right to be informed and to understand what are material and significant changes to planning policies within the Melville Council, and to have the opportunity to consider the impact and effect of such changes. This is a key role of local government that has not been fulfilled. This concern must be addressed and rectified.</p> <p>2. Significant reversal in planning policies</p> <p>My family and I have lived in the Melville Council area for six years. We have recently sold our home and have purchased a vacant riverfront block on The Esplanade in Mount Pleasant.</p>		
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	<p>The proposed abolishment of LPP1.9's 'deemed to comply' building height allowances would see new building height allowances exist within LPP3.1 that simply mirror the basic State Planning R Codes' height allowances. Such a proposal represents a reversal and abrupt change to the Council's approach to building heights in areas including Applecross and Mount Pleasant.</p> <p>The Canning Bridge precinct is an obvious example of this. High rise development in the precinct sits just 950 metres from my property address on The Esplanade. Even closer up the road, on The Esplanade and just 700 metres from my property, are a large number of 4-storey apartments.</p> <p>The proposed reductions to building heights for family homes will create a significant disparity with the existing built form in many areas of Melville Council, and such changes would limit the opportunity to develop prestigious homes to represent and proudly distinguish the Melville Council area. There has been no detail as to the 'why' behind the proposed changes, which would allow for Melville Council residents, to understand, and properly respond to, the proposed changes.</p> <p>3. Development and density brings vibrancy, enhances community and is sustainable</p> <p>Development and density creates vibrancy, enhances community and supports the economic development of beneficial amenities (such as cafes and restaurants), which enhance liveability, amenity and lifestyle in the community. Having lived in developed cities like Sydney and London, we have experienced these benefits firsthand.</p> <p>We oppose the proposed reductions to building heights because they have the effect of denying the development of such vital, desirable amenities in the areas of Melville 5 Council. Such changes revert back to era less density-conscious era where block sizes were larger and accommodated larger, lower height homes. One must only look anywhere</p>		
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	<p>else in the world to realise that cities and suburbs continually grow and develop, not go backwards.</p> <p>The proposed changes are completely out-of-step with the natural process of development and progress across cities around the world. Populations are growing, the land sizes of properties are becoming smaller, and population densities are increasing – this is occurring throughout the Melville Council area in a positive way. The Melville Council should strive to be a sustainable local Council. Allowing for density and sustainable growth means considering all elements and impacts of a planning proposal – these elements do not feature at all in the material put forward in support of the amalgamation.</p> <p>It is understandable that building height allowances in the Melville Council area are not all being increased. However, what is particularly difficult to follow and understand is the actual reduction in building heights, particularly when such height reductions are being made immediately alongside areas of large height increases like the Canning Bridge precinct, where high-rise and 4-story apartment developments are prolific. Such a policy is also at odds with the many, existing, already built homes that exist along The Esplanade. The proposed planning policies are inconsistent and at odds with the current Melville Council planning policy direction and approach.</p> <p>4. Achieving density targets</p> <p>The proposed changes to the local planning policies must be rationalised alongside the Melville Council’s requirements to meet its density targets. Such questions need to be addressed. While density is being achieved through the approval of high-rise apartments in certain Council areas, an opposite effect to reduces density is now proposed. This is counterintuitive. Particularly where higher height houses already exist. There are many riverfront areas in the Melville Council area – The Esplanade in Mount Pleasant being a prime example of this.</p>		
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		<p>Higher building heights provide an ability to achieve greater density. This is particularly important where average block sizes are decreasing. The proposed amendment to decrease the current building heights for family homes are incompatible with this.</p> <p>5. A 'one-size fits all' approach is inadequate</p> <p>Riverfront properties in Applecross and Mount Pleasant, such as along The Esplanade in Mount Pleasant, provide a prestigious river-front location for quality, architecturally designed homes that enhance the character, calibre, attractiveness and desirability of 6 not just these suburbs, but of those within the wider Melville Council area. The same is true for suburbs like Cottesloe, Mosman Park, Dalkeith, Peppermint Grove and the like.</p> <p>This is the current standard of homes along The Esplanade and it is beneficial for the Melville Council to ensure that this standard is maintained. There is visual benefit and amenity from allowing residents' homes to be in keeping with existing properties.</p> <p>It should also be noted that many properties along The Esplanade are impacted by the river flood plain. This requires houses to be built above the natural ground level, while potentially still complying with the height allowances measured from the ground level.</p> <p>The Council's planning policies must account for particular location-specific impacts, such as The Esplanade being within the river's flood plain and we strongly question why a proposed blanket rule to decrease heights is being proposed to be applied across the entire Melville Council area in a broad brush manner. This clearly ignores the different factors, influences and requirements across a large, diverse collection of suburbs and discrete areas that exists in the Council area.</p> <p>6. Final statements</p>		
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		<p>Our concern is that the proposed changes are not clearly advertised and local residents are not aware. The proposed changes do not take account of specific locations, particular issues which are outside residents' control such as flood plains, and instead apply a blanket rule for all residents.</p> <p>The proposed height reductions are not in keeping with a focus on sustainable development. They are not in line with the general direction of development in city areas which is responsive to important factors such as population growth and the sense of community which comes from living in suburbs with the amenity created by density and consistency. In particular, many properties in Applecross and Mount Pleasant have stunning river locations that are and should continue to be occupied by well-designed architectural homes. Many of the existing prestigious homes in these areas would not have been possible under the current proposed changes.</p> <p>The effect of the proposed changes needs to address the above factors and undertake a true, proper, transparent consultation. This must take place. Should this not occur it would result in a failure of government and would expose the Melville Council to legal challenge and reputational risk.</p> <p>There will be resident dissatisfaction should such changes occur without proper process. I urge the Council to act responsibly. Deferral of the current proposal of policy amalgamation to allow for wider community and third party consultation is imperative</p>		
17	Oppose	<p>We write to express our strong opposition to the proposed reduction in building heights for residential homeowners within the Melville Council area. These changes, which disproportionately affect 'mum and dad' homeowners, are not only regressive but also misaligned with the broader objectives of sustainable urban development.</p> <p>The proposal for building height reductions for residential homeowners appears to be wrongly conflated with broader issues relating to the development of high-rise apartments within the Council area.</p>	R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does	Not uphold

		<p>Planning policies should be directed toward delivering sustainable outcomes that accommodate population growth, promote efficient land use, and support vibrant, livable communities. Reducing building heights for individual homeowners undermines these goals by limiting the ability to build functional, future-ready homes that meet the evolving needs of modern families.</p> <p>Furthermore, these proposed changes do not have the support of the community. There has been insufficient consultation, and the implications of the changes have not been clearly communicated to residents.</p> <p>The lack of transparency and engagement in relation to the proposed reduction to current building heights is deeply concerning, undermines public confidence in the planning process and weakens trust between the Council and community.</p> <p>We urge the Council to reconsider the proposed reductions in building heights. Planning efforts should instead focus on enabling sustainable development that reflects the needs and aspirations of the community. We call for a renewed consultation process that genuinely engages residents and prioritises long-term, sustainable outcomes over short.</p>	<p>not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for three storey developments where design merit is considered and where contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p>	
18	Oppose	<p>We wish to provide a submission to inform the Melville Council’s consultation on the proposed amalgamation of Local Planning Policies LPP1.9 and LPP3.1. We appreciate the Council’s efforts to update planning frameworks and offer the following summary of key concerns and recommendations based on our review of the proposed changes.</p> <p>Consultation and Transparency</p>	<p>R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form</p>	Not uphold

		<p>The proposed changes have been advertised as a simple amalgamation of LPP1.9 and LPP3.1. However, they effectively remove the deemed to comply building height allowances in LPP1.9. This significant change has not been clearly communicated to the community. Proper consultation and transparent communication are essential to ensure that residents are fully informed and have an opportunity to provide input.</p> <p>Policy Reversal and Inconsistency The proposed changes represent a reversal of the Council’s previous planning direction, particularly in areas like Applecross and Mount Pleasant. These areas already feature multistorey developments, and the proposed height reductions are inconsistent with existing structures and broader urban development trends.</p> <p>Impact on Density and Sustainable Development Reducing building heights has the effect of reducing density. As block sizes decrease and population grows, higher building allowances are necessary to maintain livability, environmentally sustainable housing design and support the economic development of amenities that enhance community.</p> <p>We respectfully ask that Council:</p> <ul style="list-style-type: none"> • Conduct transparent and clear community consultation. • Clearly communicate the implications of the proposed changes. • Avoid a blanket policy and tailor planning rules to specific locations. • Adopt local planning policies that promote sustainable outcomes. • Align planning policies with broader urban development goals. • Consider a transitional period for the implementation of any policy changes to assist and not disrupt house build projects and renovations that are currently in the planning phase and recent purchases of land. 	<p>character of the City of Melville. The City does not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for three storey developments where design merit is considered and where contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p> <p>A site-specific approach is considered through the incorporation of additional housing objective P6.1 and P6.2, which considers site</p>	
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		We trust the Council will give due consideration to these concerns and take appropriate steps to ensure fair and effective planning outcomes for all residents.	topography and environmental factors where discretion is sought for additional building height.	
19	Oppose	<p>1. With regards to LPP 1.9, we oppose the proposal which will reduce overall building heights allowed under the current LPP.</p> <p>The proposal states an intent to ensure that the height of buildings are consistent with the desired character of the locality. There has been a longstanding trend towards homes with larger internal spaces. This is acknowledged in the Residential Design Codes Volume 1 Explanatory Guidelines, and in the National Planning Reform Blueprint, Western Australia September 2024 progress report.</p> <p>This trend towards homes with larger internal space is due to the significant shift in residents lifestyles since the days of big open backyards. Current living requirements now routinely include</p> <ul style="list-style-type: none"> • Larger home offices to accommodate increasing work from home requirements - Contemporary indoor recreation spaces such as home gymnasiums • Additional living spaces to accommodate multi generational living, and dependents living at home for longer (a government priority) • Additional garage spaces to accommodate enclosed workshops, rather than sheds and workshops which were previously located in gardens. • Additional room for older generations to age in place (another government priority) • Trends towards indoor / outdoor living spaces which provide for better sun and environmental protection for residents. 	R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for three storey developments where design merit is considered and where contextually appropriate.	Not uphold

	<p>When combined with the established government policy of increasing urban infill generating smaller block sizes, the only way available for residents to achieve this requirement for increased internal spaces, is to build higher.</p> <p>If residents are not allowed to build higher to obtain the required internal space, it will encourage building over a greater area of individual lots, which has a significant negative impact on important urban greening strategies.</p> <p>Council should recognise that for the reasons described above, the desired character of local areas is moving in the direction of increased building heights. This is also evidenced by the heights of planning applications currently being received by the City, and the well documented changes in lifestyles, and State / Federal government planning policies.</p> <p>If council is looking to align LPPs more closely with R Codes, then at a minimum it should consider including Category C developments as per Table 3 of the Residential Design Codes Volume 1, or other specific provisions to allow single residential developments to achieve 3 stories if required.</p> <p>2. Proposed Changes to LPP1.9 will have undue impact on current local amenity</p> <p>Our current residence on [removed] is just one example of how the proposed changes to LPP1.9 can adversely affect current amenity for many other local residents.</p> <p>Due to its proximity to the Canning Bridge Activity Centre and the Canning River, there has been a significant amount of recent development along Rookwood Street and View Road alone in the last few years. All of these developments have been approved under the current LPPs, and designed to maximise height and views of significance from their individual</p>	<p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p> <p>A site-specific approach is considered through the incorporation of additional housing objective P6.1 and P6.2, which considers site topography and environmental factors where discretion is sought for additional building height.</p>	
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	<p>positions. As such, if these proposals are accepted, many subsequent adjacent developments would be unduly and disproportionately impacted by these changes which reduce achievable height limits.</p> <p>Although the proposed amendments are targeted at the Deemed to Comply requirements, this will inevitably also have a flow on impact for any development application which seeks to use Design Principles to demonstrate compliance. It will reduce the base height over which any application may be looking to seek an exemption from. For example, if a development today was seeking a 0.5m exemption over current Deemed to Comply requirements, under the new proposals they could be looking at having to seek a significantly larger 1.5m concession.</p> <p>Whilst there is a provision for blocks with a variation in height level of over one meter, if any changes are adopted, there should also be provisions to ensure any reduced height limits do not adversely impact the future potential amenity of lots adjoining developments which were approved under previous LPPs with higher limits. The large amount of recent development surrounding Activity Areas, and areas with views of significance, makes this a substantial issue if changes to the LPP result in lower height limits.</p> <p>3. Lack of evidence for impetus from customers for these proposed changes.</p> <p>Despite the claimed Customer First Approach to these amendments, there has not been any evidence presented that these proposals have been initiated because of a significant burden of requests from residents or ratepayers in the City of Melville.</p> <p>Whilst these proposed changes may be in areas that provide for the most contention in development applications, this is a commonality to many development application processes, and not necessarily directly due to the actual current allowable height limits. The City should be cautious in considering these changes if there is a lack of evidence that these specific changes to the LPP are actually desired by the majority of</p>		
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	<p>ratepayers or residents, or have been initiated in response to such requests from ratepayers and residents.</p> <p>If a significant number of recent development application are at or exceeding the current LPP provisions, then this in itself should be taken as evidence that the current trend and desire from residents is to not have more restrictive clauses proposed within the LPPs.</p> <p>Keeping consistency with the desired character of the locality is mentioned throughout the Proposal, however it is not made apparent who or what is setting this desired local character. If there is a particular local character being pursued, there is a lack of evidence surrounding what it is, and how it has been developed.</p> <p>The City should be responsive to the trends in residents lifestyles which are driving these directions for increased heights in residential development. These trends are also supported by well documented government policies over the last few years which aim to encourage multi generational living and aging in place.</p> <p>4. Difficulties for laypeople in understanding the current information provided on the community engagement website, and the overall effects of proposed changes to LPP3.1,</p> <p>Whilst the City's Community Engagement website does contain detailed information about the proposed changes to LPP3.1, and the City's Statutory Planners have been very helpful in providing verbal guidance to us, it remains difficult for a layperson resident to fully understand the ultimate impact of the proposed changes.</p> <p>Whilst the proposed amendment information available on the Community Engagement website details a significant number of changes to clauses, principles and objectives which are cross referenced with R Codes and additional provisions, it remains difficult for those without a detailed</p>		
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		<p>understanding of R codes and design principles to quantify the final impact of any of these individual changes.</p> <p>A more customer focused approach to explaining the proposed changes might include a side by side analysis of each of the proposed modified and additional provisions, with details of the actual impact and quantum of change. For example, Changing C3.2 to Clause 5.4.2 will result in a X meter reduction in wall height in X areas, with a table illustrating the before and after effects.</p> <p>We feel that clearer information about the actual impact of the proposed changes need to be presented to residents and ratepayers, and the community engagement period extended to allow for a better understanding by laypersons who wish to provide submissions</p>		
20	Oppose	<p>This letter serves as a formal response to the City of Melville’s proposed integration of Local Planning Policies LPP1.9 and LPP3.1. While I commend the initiative to streamline planning regulations, I wish to highlight several issues and offer constructive recommendations.</p> <p>Although the proposal is framed as a straightforward merger of two policies, it effectively eliminates the deemed-to-comply height provisions previously outlined in LPP1.9. This substantial modification proposed to allowed building heights is not well known and has not been adequately conveyed to residents by the advertising undertaken. I urge Council to improve its communication on the key aspects of proposed policy change to ensure meaningful public engagement.</p> <p>The proposed revisions contradict earlier / existing planning strategies, particularly in suburbs such as Booragoon, Bicton, Applecross and Mount Pleasant. These neighbourhoods must be able to maintain their existing character and quality of housing design. The proposed reductions to height allowances impede such outcomes and will create misalignment within existing urban streetscapes.</p>	R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2	Not uphold

		<p>Instead, planning policies should facilitate well-designed, higher-density housing rather than constrain it through restrictive measures. A balanced approach that supports growth while preserving neighbourhood character is essential for sustainable urban development.</p> <p>Restricting building heights will inevitably lead to lower residential density. As lot sizes shrink and population increases, it is vital to allow for vertical expansion to preserve livability, encourage sustainable housing solutions, and support the growth of community infrastructure.</p> <p>Higher residential density fosters vibrant, active communities by increasing population and supporting local businesses and local amenities. Such outcomes promote social interaction, strengthen community bonds and attract investment. These outcomes lead to improved amenities, infrastructure, and overall lifestyle quality, making the City of Melville a more desirable place to live.</p> <p>The Council must avoid uniform regulations that disrupt the design and character of individual precincts. Planning policies that foster sustainability and long-term viability of housing should be pursued and, in doing so, ensure alignment with overarching urban development strategies.</p> <p>I am grateful for the opportunity to contribute to this important discussion and trust that the Council will consider these points in its decision-making process.</p>	<p>to this policy, which allow discretion for three storey developments where design merit is considered and where contextually appropriate.</p> <p>Commentary of this policy impacting housing densities across the City are not relevant, as only built form standards of dwellings are considered – not any zoning changes.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p> <p>A site-specific approach is considered through the incorporation of additional housing objective P6.1 and P6.2, which considers established characteristics</p>	
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			of localities, site topography and environmental factors where discretion is sought for additional building height.	
21	Oppose	<p>1. Response to Consultation Regarding Proposed Planning Policy Changes.</p> <p>As long-standing residents of the Melville Council area, we appreciate the opportunity to provide feedback on the proposed amalgamation of Local Planning Policies LPP1.9 and LPP3.1. This submission focuses on a critical concern: that objections to high-rise development should not result in reduced building height allowances for average residents seeking to build homes. Balanced planning is essential to ensure fairness, community benefit, and consistency in policy application.</p> <p>2. Balanced Planning for All Residents</p> <p>While we understand that some community members may object to high-rise developments, it is important that these objections do not lead to blanket reductions in building height allowances across the board. Typical residents of the Melville Council Community, including families and professionals, rely on existing planning policies to build functional, multi-generational homes that meet modern living needs. Reducing height allowances penalizes these residents and undermines the diversity and vibrancy of our community.</p> <p>3. Community Benefit and Liveability</p> <p>A reduction to the Deemed to Comply building height inevitably leads to decreased density. This is a concern as higher-density development, when thoughtfully planned, brings significant benefits to the community. It</p>	R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for dwellings that exceed height requirements where the design merits	Not uphold

		<p>supports local businesses, enhances public amenities, and fosters a vibrant, connected neighbourhood. Restricting building heights risks stalling progress and diminishing the quality of life for all residents.</p> <p>4. Need for Policy Consistency and Transparency</p> <p>The proposed changes are inconsistent with existing developments in areas such as the Canning Bridge precinct, where high-rise buildings are already established. It is contradictory to reduce height allowances for new homes while allowing large-scale developments nearby. Planning policies must be applied consistently and transparently to maintain public trust and ensure equitable treatment of all residents.</p> <p>5. Importance of Proper Consultation</p> <p>We are concerned that the proposed changes have not been adequately advertised or explained to the community. Describing the changes as a simple 'amalgamation' fails to convey the significant impact on building height allowances. Proper consultation and clear communication are essential to uphold democratic governance and avoid eroding community trust.</p> <p>We urge the Melville Council to reconsider the proposed reductions in building height allowances. Planning policies should support both development and liveability, and must not overreact to objections in a way that penalises average residents. We recommend</p>	<p>this and where it is contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p> <p>Commentary of this policy impacting housing densities across the City are not relevant, as only built form standards of dwellings are considered – not any zoning changes.</p> <p>A site-specific approach is considered through the incorporation of additional housing objective P6.1 and P6.2, which considers site topography and environmental factors where discretion is sought for additional building height.</p>	
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22	Oppose	<p>We are long standing residents of the Melville Council area and we welcome the opportunity to comment on the proposed changes to the local planning policies that govern the building of homes by residents and rate payers of the Melville Council. My submission outlines a number of material concerns that need to be understood and addressed through proper consultation.</p> <p>We have identified material policy elements that require further examination. We have also identified issues in relation to the process of consultation and advertising that has taken place. These material policy elements and issues in relation to the consultation must be addressed before the Council can duly perform a proper and thorough assessment of the changes proposed to its local planning policies.</p> <p>The key matters identified within this submission include:</p> <ul style="list-style-type: none"> • Failure to properly consult on key elements of the proposed planning policy changes – Council must observe proper process and not undertake significant policy changes in the absence of this. • Proposed changes represent a significant reversal in the Council’s planning policies – such changes are out of step with the times, do not foster sustainable outcomes, do not have broad community support, and are at odds with the existing direction of development. • Restraints on development and density that would otherwise bring vibrancy, enhance community and support the economic development of beneficial community amenities – this should not be denied. • Proposed changes that are counter-productive to achieving the Council’s required density level to meet the future needs of its growing population. • A ‘one-size-fits-all’ approach that is not appropriate and fails to take account of specific locational-based factors, many of which are outside residents’ control. • Proposed planning policies that inhibit the development of the prestigious locations which should be allowed to benefit from 	<p>R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building heights which generally allow three storey development as “as of right” in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for dwellings that exceed height requirements where the design merits this and where it is contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and</p>	Not uphold
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		<p>architectural designs befitting of their location, to showcase, uplift and maintain the prestige and desirability of the premium suburbs of the Melville Council.</p> <ul style="list-style-type: none"> • Proper consultation and community awareness of the key proposed changes to important Council policies is required – otherwise the Melville Council may be exposed to a wide range of challenges. <p>An investigation of the concerns outlined within this submission must take place. The significance of such changes requires a proper, thorough assessment and the Melville Council must not make a final decision until due process has been observed.</p> <ol style="list-style-type: none"> 1. Failure to adequately advertise and make community aware of key proposed planning policy changes <p>A key issue identified is what has been advertised as an amalgamation of LPP1.9 and LPP3.1. On closer inspection, we have identified that the proposed changes in fact seek to abolish and remove the existing ‘deemed to comply’ building height allowances that exist within LPP1.9. This is not widely known or understood by the Melville Council community, and it does not simply represent an amalgamation of LPP1.9 and LPP3.1, as has been advertised.</p> <p>Local governments are elected by the people of their council areas. Local governments have a responsibility to govern and make decisions that reflect the best interests of the constituents they represent.</p> <p>To do this, proper consultation and awareness within the community of key changes to important council policies – such as home building planning policies – must occur through clear and transparent advertising and consultation process. As detailed below, this requirement has not been met for certain, very important facets of the proposed changes.</p>	<p>Development Regulations.</p> <p>Commentary of this policy impacting housing densities across the City are not relevant, as only built form standards of dwellings are considered – not any zoning changes.</p> <p>A site-specific approach is considered through the incorporation of additional housing objective P6.1 and P6.2, which considers site topography and environmental factors where discretion is sought for additional building height.</p>	
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	<p>The broader Melville community must have an opportunity to provide input and have their say.</p> <p>The consultation undertaken by the Council advertises the proposed changes as an 'amalgamation' of LPP1.9 and LPP3.1. The Council's website states, "As part of this update, LPP1.9 would be rescinded, with key building height provisions incorporated into LPP3.1." This is misleading. Melville residents and rate payers are led to believe that the LPP1.9 building height provisions will simply be 'incorporated' into LPP3.1. This was our initial understanding and a belief held by other ratepayers whom we know, however this is not the case.</p> <p>Should this proposed change take effect, it would reduce the Council's 'deemed to comply' building height allowances by around 1 metre in most cases. This would have a significant impact for many proposed and future home developments in the Council area.</p> <p>The proposed changes are certainly not stated clearly and do not reflect what is published on the Council's 'Community Engagement' page, which advertises a simple 'amalgamation.' An extract below taken from the Melville Council's Community Engagement page that advertises the amalgamation is provided to demonstrates this.</p> <p>The abolishment and removal (rather than amalgamation) of the current LPP1.9 building height allowances cannot be identified until the detailed PDF documentation is downloaded and then cross-referenced back to complex State Planning R-Codes (which also need to be downloaded and interpreted).</p> <p>Such an exercise, to download and decipher what are complex planning rules and documents, cannot be expected to be an easy or reasonable task for the typical resident or ratepayer. It is the role of the required advertising and consultation process to make such matters known, to provide the community with an opportunity to comment.</p>		
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	<p>Such failing raises material concerns in relation to the transparency and accuracy of the advertising and consultation being undertaken by the Council. The proposed changes are not a simple amalgamation of two planning policies (as advertised) but instead see the removal of a key planning policy in relation to 'deemed to comply' building height allowances.</p> <p>These concerns are further evidenced by the fact that professional town planners, who specialise in this area of planning, have had no knowledge of the proposed abolishment 4 of LPP1 .9 building height allowances. Similarly, local real estate agents and builders who are active within the Melville Council area are also not aware.</p> <p>The effect is that the proposed changes have not been properly advertised, are not well known and, to some degree, are occurring by stealth. The local community deserves the right to be informed and to understand what are material and significant changes to planning policies within the Melville Council, and to have the opportunity to consider the impact and effect of such changes. This is a key role of local government that has not been fulfilled. This concern must be addressed and rectified.</p> <p>2. Significant reversal in planning policies</p> <p>My family and I have lived in the Melville Council area for six years. We have recently sold our home and have purchased a vacant riverfront block on The Esplanade in Mount Pleasant.</p> <p>The proposed abolishment of LPP1.9's 'deemed to comply' building height allowances would see new building height allowances exist within LPP3.1 that simply mirror the basic State Planning R Codes' height allowances. Such a proposal represents a reversal and abrupt change to the Council's approach to building heights in areas including Applecross and Mount Pleasant.</p>		
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	<p>The Canning Bridge precinct is an obvious example of this. High rise development in the precinct sits just 950 metres from my property address on The Esplanade. Even closer up the road, on The Esplanade and just 700 metres from my property, are a large number of 4-storey apartments.</p> <p>The proposed reductions to building heights for family homes will create a significant disparity with the existing built form in many areas of Melville Council, and such changes would limit the opportunity to develop prestigious homes to represent and proudly distinguish the Melville Council area. There has been no detail as to the 'why' behind the proposed changes, which would allow for Melville Council residents, to understand, and properly respond to, the proposed changes.</p> <p>3. Development and density brings vibrancy, enhances community and is sustainable</p> <p>Development and density creates vibrancy, enhances community and supports the economic development of beneficial amenities (such as cafes and restaurants), which enhance liveability, amenity and lifestyle in the community. Having lived in developed cities like Sydney and London, we have experienced these benefits firsthand.</p> <p>We oppose the proposed reductions to building heights because they have the effect of denying the development of such vital, desirable amenities in the areas of Melville 5 Council. Such changes revert back to era less density-conscious era where block sizes were larger and accommodated larger, lower height homes. One must only look anywhere else in the world to realise that cities and suburbs continually grow and develop, not go backwards.</p> <p>The proposed changes are completely out-of-step with the natural process of development and progress across cities around the world.</p>		
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		<p>Populations are growing, the land sizes of properties are becoming smaller, and population densities are increasing – this is occurring throughout the Melville Council area in a positive way. The Melville Council should strive to be a sustainable local Council. Allowing for density and sustainable growth means considering all elements and impacts of a planning proposal – these elements do not feature at all in the material put forward in support of the amalgamation.</p> <p>It is understandable that building height allowances in the Melville Council area are not all being increased. However, what is particularly difficult to follow and understand is the actual reduction in building heights, particularly when such height reductions are being made immediately alongside areas of large height increases like the Canning Bridge precinct, where high-rise and 4-story apartment developments are prolific. Such a policy is also at odds with the many, existing, already built homes that exist along The Esplanade. The proposed planning policies are inconsistent and at odds with the current Melville Council planning policy direction and approach.</p> <p>4. Achieving density targets</p> <p>The proposed changes to the local planning policies must be rationalised alongside the Melville Council’s requirements to meet its density targets. Such questions need to be addressed. While density is being achieved through the approval of high-rise apartments in certain Council areas, an opposite effect to reduces density is now proposed. This is counterintuitive. Particularly where higher height houses already exist. There are many riverfront areas in the Melville Council area – The Esplanade in Mount Pleasant being a prime example of this. Higher building heights provide an ability to achieve greater density. This is particularly important where average block sizes are decreasing. The proposed amendment to decrease the current building heights for family homes are incompatible with this</p>		
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	<p>5. A 'one-size fits all' approach is inadequate</p> <p>Riverfront properties in Applecross and Mount Pleasant, such as along The Esplanade in Mount Pleasant, provide a prestigious river-front location for quality, architecturally designed homes that enhance the character, calibre, attractiveness and desirability of not just these suburbs, but of those within the wider Melville Council area. The same is true for suburbs like Cottesloe, Mosman Park, Dalkeith, Peppermint Grove and the like.</p> <p>This is the current standard of homes along The Esplanade and it is beneficial for the Melville Council to ensure that this standard is maintained. There is visual benefit and amenity from allowing residents' homes to be in keeping with existing properties.</p> <p>It should also be noted that many properties along The Esplanade are impacted by the river flood plain. This requires houses to be built above the natural ground level, while potentially still complying with the height allowances measured from the ground level.</p> <p>The Council's planning policies must account for particular location-specific impacts, such as The Esplanade being within the river's flood plain and we strongly question why a proposed blanket rule to decrease heights is being proposed to be applied across the entire Melville Council area in a broad brush manner. This clearly ignores the different factors, influences and requirements across a large, diverse collection of suburbs and discrete areas that exists in the Council area.</p> <p>Final statements Our concern is that the proposed changes are not clearly advertised and local residents are not aware. The proposed changes do not take account of specific locations, particular issues which are outside residents' control such as flood plains, and instead apply a blanket rule for all residents.</p>		
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23	Oppose	<p>While we support efforts to streamline and clarify planning policies, we are concerned that the proposed changes will undermine local character protections, reduce transparency, and limit opportunities for public input on matters that significantly affect community amenity.</p> <p>It is not entirely clear what changes to planning policies will be invoked by this proposed amalgamation. There needs to be a clear and concise comparison of changes, e.g. what clause replaces what clause, or current building height is 11m which will now reduce to 10.5m, etc. Key Objections:</p> <p>1. Loss of Entitlement to Building Height LPP 1.9 currently provides clear, standalone guidance on building heights outside of activity centre areas, helping to ensure that development is</p>	R-Code DCC height limits provide as of right two storey development, which is contextually appropriate and generally the established built form character of the City of Melville. The City does not consider building heights which generally allow three storey development as "as of	Not uphold concerns regarding building heights, densities and approach to advertising, but consider retaining existing LPP3.1 provisions for gatehouses.

	<p>kept within the desired character of local neighbourhoods. Folding these provisions into LPP 3.1 risks diminishing focus on height as a critical planning consideration and may lead to inconsistent application and unfair consequences for residents whose vista/views have been or are being eroded and progressively obstructed by current developments.</p> <p>2. Reduced Transparency and Accessibility The consolidation of two distinct policies into one, while aimed at simplification, may make it more difficult for residents to understand how building heights are regulated. LPP 1.9 is a clear, concise policy that can be referred to independently. Removing it eliminates a straightforward reference point for both residents and decision-makers.</p> <p>3. Insufficient Community Engagement on Key Development Standards Height and scale of buildings are often the most contentious and impactful elements of residential development. By treating these as minor policy adjustments within LPP 3.1 rather than maintaining a dedicated policy, the City may limit future consultation and community involvement on height-related issues. This is especially concerning given the growing pressures of densification and urban infill development across the City.</p> <p>4. Risk of Erosion of Local Character and Amenity The proposed amendments aim to "better align" with State Planning Policies and the R-Codes, but in doing so may weaken existing local protections tailored to the unique context of Melville's suburbs. Deemed-to-comply height standards should not be reinterpreted in a way that prioritises development efficiency over neighbourhood character or residential amenity.</p> <p>5. Gatehouse Definition Removal Without Clear Justification The removal of the "Gatehouse" definition and provisions may result in interpretation issues or unregulated built form at front boundaries. This</p>	<p>right" in residential areas to be appropriate. The City has included additional housing objectives P6.1 and P6.2 to this policy, which allow discretion for dwellings that exceed height requirements where the design merits this and where it is contextually appropriate.</p> <p>The City notes that consultation was conducted above the statutory requirements of the Planning and Development Regulations.</p> <p>Commentary of this policy impacting housing densities across the City are not relevant, as only built form standards of dwellings are considered – not any zoning changes.</p>	
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