

LPP1.20 Canning Bridge Activity Centre Plan – Density and Bonus Provisions Schedule of Submissions			
Sub No.	Position S = Support O = Oppose N = Neutral	Submission	Comments
1.	S	The proposed policy is a very welcome step. One issue that still appears to need some tinkering with is how setbacks are worked out in the H4 zone. 20+ units on a touch over 1,000 SQM produces tall slab sided buildings that are too close to boundarys. There needs to be larger setbacks for higher density buildings.	Noted.  The side and rear setback requirements of the H4 zone are comparable to the requirements of the R-Codes Vol2 – Apartments.  <b>H4 Zone</b> Side setbacks: 3m - 4m Minimum Rear setbacks: 3m – 4m Minimum Third or fourth storey to outside CBACP area: 8m  <b>R-Codes Vol2 – Apartments</b> (up to four storeys) Minimum side setback: 3m Minimum rear setback: 3m – 6m
2.	S	Because this policy was written by the community for the community.	Noted.
3.	S	I support the LPP1.20 because it demonstrates a "managed" approach to density and bonus provisions in each individual zone, and for the precinct overall. It also sets maximum heights.	Noted.
4.	S	Because it takes a practical approach towards resolving the conflicts between increased density, traffic flow, infrastructure and amenity.	Noted.
5.	S	These provisions provide clarity for both residents and developers in relation to possible development outcomes for CBACP. The provisions will also ensure that there high quality development outcomes.	Noted.
6.	S	The Policy is easy to apply. It sets clear guidelines for all parties. Outcomes are easily identified, measured and audited. The Policy sets maximum density limits, which will limit the height and number of dwellings per net hectare so that the key objectives of the CBACP are met. All these matters are important for the Density and Bonus Provisions to be used by developers, local residents and applied by the officers of Melville City Council in an equitable way.	Noted.
7.	S	I am worrying the overshadow from my neighbour as the CBAC boundary is sitting right to my house. It is not acceptable our neighbour will have the capacity to build a four stories house. It is not acceptable the boundary is crossing between two houses instead of on a road or street. We are expecting see more clarification about the house right next to the boundary.	Noted.  LPP1.20 intends to: <ul style="list-style-type: none"> <li><i>‘provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development’</i></li> </ul> The H4 zone of the CBACP allows for development up to four storeys (to 16 metres in height). LPP1.20 does not affect this possibility.  Greater setbacks to third and fourth storeys (8m) have previously been introduced where H4 development adjoins properties outside of the CBACP to lessen the impact of building bulk and overshadowing.  The CBACP boundary in this area is currently under review with a proposed modification to the boundary recently endorsed by Council and forwarded to the WAPC for consideration. The proposed modified boundary follows the carriageways of Helm Street, Sleat Road and Wren Street to Ullapool Road, Mount Pleasant.
8.	S		Noted.
9.	S		Noted.
10.	S	Open and transparent when requesting additional floors.	Noted.
11.	S	We need consistency with approval, too many height bonuses allowed.	Noted.
12.	S	Primarily due to the proposed LPP providing clarity and ensuring that there is an end to the crazy bonuses currently being given.	Noted.
13.	S		Noted.
14.	S	It establishes a nexus between community benefit and bonus heights. Also provides consistency and transparency.	Noted.
15.	S	It is necessary that building height be managed to prevent over-densification.	Noted.
16.	S	Clearly defines that there must be a link between the planning proposals and the wishes of the community.	Noted.
17.	S	It provides clarity towards the awarding of bonus height that was extremely unclear in the Canning Bridge Activity Centre Plan.	Noted.
18.	S		Noted.
19.	S	The proposed policy provides objective and transparent mechanisms for the awarding of bonus heights, and properly recognises the community input and appropriate community contributions.	Noted.
20.	S		Noted.

21.	S	It sets a resonable limit on bonus heights and ensures that local residents amenity is considered. It redresses the imbalance that currently exists whereby developers financial outcomes are put ahead of existing residents needs. It ensures that appropriate community benefits are provided.	Noted.
22.	S	LPP1.20 encourages design excellence and award bonus height in proportion to community benefit offered. It establishes clear connection between Community Benefit and Bonus Height and provides protections against excessive development density. It provides additional clarification of the CBACP in important areas including a robust methodology for the award of bonus height. LPP1.20 provides a means of regulating bonus height and therefore provides protections that are important to the community.	Noted.
23.	S	I find the terms of all of this quite confusing, but I support the stakeholder group's policy. I think it is disappointing and fairly infuriating that it has taken so long to have community input into a poorly regulated system for bonus-height provisions. I wonder what the point of having an M10 and M15 zone is if the CBACP is happy to almost encourage bonus heights, leading to ridiculously tall developments.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul>
24.	S	The lack of transparency in the recent past has caused much angst and frustration, particularly for those whose lifestyle and property values have been affected by high-rise developments. Any improvement would be much welcomed.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul> Property value is not a material planning consideration
25.	S	Please accept this as my response i ticked the wrong box on previous submission. Thank you	Noted.
26.	S	I support the policy because is provides clarity on height limits, including bonus heights.	Noted.
27.	S		Noted.
28.	S	The proposed Policy is finally putting some objective criteria in place concerning bonus height provisions for buildings in the CBCAP area, which is so much better than the existing free-for-all in place.	Noted.
29.	S	We have had far too many apartment towers all being granted additional storeys. There is not enough parking supplied to these apartments so our streets become clogged with cars parking overnight. There is also much congestion to the morning traffic. We don't mind the building of these towers just keep them at the levels already set.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to increased densities.</i></li> </ul>
30.	S	it gives much more certainty to residents and potential residents of what to expect development wise in the CBAC	Noted.
31.	S		Noted.
32.	S	There should be maximum clarity about what is "permitted" and the circumstances in which those limits may be exceeded and by how much. The welfare of existing residents/ratepayers and the welfare of those who will live in any permitted developments should have priority over the benefits to developers and investors.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li>• <i>to provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> <li>• <i>outline supporting processes, thresholds and documentation required of applicants when seeking bonuses</i></li> </ul>
33.	S	The proposed policy is a great improvement over the existing policy. Unfortunately damage has already been done to the precinct by the bonus height policy. Zoning regulations are pointless if they allow heights above the stipulated heights. The council should have high standards for all high rise buildings. When developers build better apartment buildings they will be rewarded with better selling prices. There is no rationale for bonus height provisions.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul>
34.	S	It provides a measurable, auditable, robust and transparent formula for the award of bonus height that is not available from the CBACP at present	Noted.
35.	S		Noted.
36.	S		Noted.

37.	S		Noted.
38.	S		Noted.
39.	S	<p>The city has been abusing the existing policies by liaising with developers and caving in to their demands with no thought given to residents. I sincerely hope this policy stops this practice or at least limits it. I understand the concerned community actually wrote the policy and then the city would have amended it. They did this because it took 2 1/2 years for the city to act! Please note : I wasn't sure if my comments came through so excuse me for re-submitting it.</p> <p>With the existing policy, the city would cave in to the demands of developers without considering residents' valid concerns. I sincerely hope this policy will stop or at least limit this practice. I understand the concerned residents initially wrote the policy and then the city amended it as it took the city 2 1/2 years to action it .</p>	Noted.
40.	S		Noted.
41.	S		Noted.
42.	S	<ul style="list-style-type: none"> <li>• It meets the intention of the CBACP to encourage design excellence</li> <li>• It meets the intention of the CBACP to award bonus height in proportion to community benefit offered</li> <li>• It establishes a nexus between Community Benefit and Bonus Height</li> <li>• It clarifies the CBACP where the CBACP lacks clarity</li> <li>• It calls for a register of bonus provisions which will provide consistency and transparency in the award of bonus heights</li> </ul>	Noted.
43.	S	<p>Existing residential properties must be protected by the council . residence must now about and have a clear understanding of future planing. The Council ( Residence/ Rate payer ) must agree in full.</p>	<p>Noted.</p> <p>LPP1.20 intends to:</p> <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to increased densities.</i></li> </ul>
44.	S	<p>It meets the intention of the CBACP to award bonus height in proportion to community benefit offered</p> <p>It clarifies the CBACP where the CBACP lacks clarity</p> <p>It is necessary and desirable that building height be managed to prevent over-densification</p> <p>It provides a measurable, auditable, robust and transparent formula for the award of bonus height that is not available from the CBACP at present</p> <p>It reflects the wishes of the community.</p>	Noted.
45.	S	<p>This Plan provides explicit criteria for density, height limits and design features that have been lacking to date.</p> <p>The standards for the awarding of bonus heights give precision, clarity and proportionality to a part of the plan that has been vague and able to be exploited by developers.</p> <p>This is a return to the intention of the original plan for the Canning Bridge area.</p>	Noted.
46.	S	<p>It offers greater clarity to both the community and the developers on the issue of increased densities and bonus provision</p> <p>It protects the City's planning officers from suspicion of misconduct</p>	Noted.
47.	S	<p>Recent behaviour from the council show that the council has been working for their own benefit, sometimes involving hidden financial gain, not of that of the city they represent. The SWG will represent the residents more for whom the council is meant to be acting.</p>	Noted.
48.	S	<p>Support to protect the long term &amp; generally senior residents being pushed around by developers for their own gains</p>	Noted.
49.	S		Noted.
50.	S	<p>There will be too much congestion ie. traffic, parking , danger to pedestrians and inconsistencies in height of multi story buildings in not conforming to acceptable level of requirement and concerns of The rate payers in the city of Melville</p>	<p>Noted.</p> <p>LPP1.20 intends to:</p> <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to increased densities.</i></li> </ul>
51.	S	<p>It meets the intention of the CBACP to offer bonus height in proportion to community benefit offered.</p> <p>It provides some protection against over densification of the CBAC</p>	Noted.
52.	S	<p>I suppose the published planning policy and commend that it was developed with community involvement</p>	Noted.
53.	S	<p>The policy clarifies the relationship between bonus heights, density and benefits to the community. I would also like fixed set backs in the H4 zone. Current developments are way too large for suburban blocks, building right to the edges of the property and imposing considerably on neighboring properties. This is unsafe, given the size of cranes being used, and is an unreasonable imposition on adjacent properties, for both privacy and access to sunlight.</p>	<p>Noted.</p> <p>LPP1.20 intends to:</p> <ul style="list-style-type: none"> <li>• <i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> </ul>

			<p>Greater setbacks to third and fourth storeys (8m) have been previously introduced where H4 development adjoins properties outside of the CBACP to lessen the impact of building bulk and overshadowing.</p> <p>The use of cranes for construction purposes is not a material planning consideration.</p>
54.	S		Noted.
55.	S	I am not at all happy with the manner in which 'bonus' heights were given to developers with no community input. This now provides some degree of clarity and transparency.	Noted.
56.	S	This provides the community with a much better approach to the management and issuance of bonus heights.	Noted.
57.	S		Noted.
58.	S	It does what it can to improve the assessment criteria for bonus heights.	Noted.
59.	S	Support	Noted.
60.	S	My councillor is aware of my views. She is well able to represent them. That is why she was elected. em	Noted.
61.	S	I think the Stakeholder Working Group Policy is a good attempt to reflect community views in circumstances in which the community has been shocked at the bonus heights that have been allowed for no tangible community benefit. I therefore fully support this Policy.	Noted.
62.	S	There is no need for high rise development so far away from Perth city Cbd.	Noted.
63.	S	<p>It provides correlation between community benefit and bonus height allowances</p> <p>It permits a register of bonus provisions as a reference for future bonus height requests</p> <p>It reflects the community wishes to regulate bonus heights</p>	Noted.
64.	S	There needs to be transparency around all decisions relating to present and future development in sensitive areas of our city. Especially the Canning Bridge Activity Centre.	Noted.
65.	S	We have a real concern about the impact building height has, and may continue to have, on over-densification. It seem the process of 'bonus height' management has led to decisions being made that favour the developers to the detriment of the community. The policy being proposed should go a long way toward preventing that happen again.	Noted.
66.	S		Noted.
67.	S	I believe that transparency is very important in Planning. Developers have an intrinsic incentive to push for concessions, and strong and clear and transparent rules are the best way of providing balance. Good rules-based policy will make planning officers' jobs easier, and will lessen public protest. Ratepayers will have a better knowledge of what the rules actually are, and will be able to make a more informed case if they wish to comment on particular developments.	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul>
68.	S	It provides some protection against over-densification of the CBAC and the bottleneck currently occurring at Canning Bridge is unacceptable as no provision has been made to widen Canning Highway now or in the future to alleviate this problem.	<p>Noted.</p> <p>LPP1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to increased densities.</i></li> </ul>
69.	S	<p>See attached</p> <p>Whilst I appreciate that the City is following State Government density directives, the acceptance of the proposed CBACP and bonus provisions are questionable. In particular, regarding the Canning Bridge Precinct the horse has bolted. It is apparent that the approval of a 30 storey and 2 times 26 stories buildings is a disaster. There is no room for any expansion to cater for increased road traffic. Kintail Rd is already under siege and there is no way the Highway can be widened. The Bridge and the eastern part of the Highway again are limited to further expansion. Perth City is the place for high office blocks etc, not a scenic city like Melville. Garden City to ‘Concrete Jungle’ With regard to bonus provisions, they should never be considered now or in the future. Once a zoning has been decided that should be that. The potential for high rise slums (in the future) one only needs to see what happened in Sydney and Melbourne in the 60s and 70s with both cities now paying the cost.</p> <p>It should always be the maxim, for the current generation, to leave the world a better place for our grandchildren. In the current climate in Melville that obviously will not be the case.</p>	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul>
70.	S	I think there is already too much redevelopment in the area and this has increased the traffic congestion. Further expansion will only make the problem far worse.	<p>Noted.</p> <p>LPP1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to increased densities.</i></li> </ul>

71.	S		Noted.
72.	S	In the past it has been impossible to ascertain why height bonuses were provided. It is to be hoped these changes will provide clarify and the City Planning Officers will now need to show just cause for allocating heights in excess of the CBACP agreed heights.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> </ul>
73.	S	This is a first step toward Applecross residents having a tangible input to what is intended to be built within the CBACP precinct and it is rightly so. Too often, governing entities have relied on the apathy of the many until a tipping point is reached as has been demonstrated in recent times.	Noted.
74.	S	Bonus height in relation to community benefit has appeared nebulous and being concerned with what has appeared as the closeness of planning officers to developers, I trust greater clarity on bonus provisions will provide the community with greater trust in the process. Design excellence should be a given and my preference would be NO additional heights with those designated in the CBACP maintained.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> </ul>
75.	S	As a stance has to be made to protect local residents and the wider community from developers whose sole interest is in how much money they can make. They don't live in the area, have no conscience or concern on what they do to the area or the community.	Noted.
76.	S	The new policy appears to have clear guidelines for the award of additional height. I think it is very important that the maximum heights are not exceeded. I don't believe it's necessary to build so high to achieve the population density required, and the new, very high buildings are already a visible blight on the precious riverside we are lucky enough to enjoy in Perth, an area which should be maintained for the amenity of the public. Please make sure this is now controlled as it is defined.	Noted.
77.	S	I grudgingly support the changes to the CBACP as it's a step back from the uncontrolled development that is the current reality. However there should be no bonus height provisions and that developments in the CBACP follow State guidelines for each of the Planning Zones. But you have not address the issues with the Buildings Podiums. In particular examine pages 4 & 5 of my attached submission.	Noted.
78.	S	We have seen how Sabina Apartments were built. It is totally unacceptable how that managed to get through to the Approval stage. We hope this kind of appalling high rise design will never ever be built again.  The intention of the CBACP is to encourage design excellence, meet Community Benefit, protect over-densification of the CBACP, to say the least.  There should be clarity and transparency when awarding bonus height in proportion to community benefit being offered.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> </ul>
79.	S	I support this as I have seen the developments happening in Applecross and surrounding areas. Look at the Sabina Apartment. It is extremely tall with very high density. The built is not of high quality. Look at the mobile 5G network on the rooftop too. It just stands out. As well as the small Restaurant on ground floor. High Towers like this just seem out of place in the green leafy suburb.	Noted.
80.	S	I support this as I believe that there should be a nice average height to buildings in the suburb, where they should not have to compete to obtain natural light, cool south-west breeze at night, etc. The streets are not wide in the Canning Bridge area and therefore, if the buildings are offered too much bonus height, there will be overshadowing problems, natural light, noise, more traffic as well, etc. We need good balance.	Noted.
81.	S	The building is too high, Applecross will be too crowded.	Noted.  LPP1.20 intends to: <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to increased densities.</i></li> </ul>
82.	S	It will provide greater clarity and definition, currently lacking, in the CBACP. It addresses maximum dwelling density, minimum Lot size, maximum bonus height of additional 30%, better definition of community benefits and values. In addition I believe there needs to be more prescriptive requirements for the M15 and M10 zones, such as maximum circumference of a tower and a defined plot ratio to ensure green spaces on the development.	Noted.  The LPP does not include provisions relating to 'maximum circumference of a tower', however, the CBACP review currently being undertaken includes work on the alignment between the CBACP and the R-Codes Vol.2 – Apartments. This will likely result in a 'Building Depth' development provision being introduced (as was the case in the recently completed South Perth CBACP review) that will result in a maximum building depth of 20m being applicable.

83.	S	<p>The policy provides clear and transparent guidelines for the award of bonus height in the CBACP.</p> <p>Community benefits are listed and the benefit quantified which makes it possible to award bonus height IN PROPORTION to community benefit which is the requirement of the CBACP but which is not possible with the CBACP as it currently stands.</p>	Noted.
84.	S	<p>While I am opposed to any height bonuses, as long as they exist, we need an LPP like this which should lead to outcomes more consistent with the desires of the local community. The City of Melville Planning Department definitely needs firm guidance - what has happened so far in the CBAC is unacceptable. By now, Council should have heard the community's message. This has been under consideration for too long, get on with it and support this LPP.</p>	Noted.
85.	S	<p>This will better reflect what the community wants and expected. Contentious issues re excessive bonus heights and over densification are addressed by this policy. What is currently happening (eg excessive heights justified by useless community benefits) is totally unacceptable and needs revision. The community expects this policy to be implemented ASAP and adhered to by the City of Melville Planning Department.</p>	Noted.
86.	S	<p>This change is necessary to maintain the amenity of Applecross and Mt Pleasant</p>	Noted.
87.	S	<p>We need logical controlled development in Applecross, not the unregulated mess we have at present.</p>	Noted.
88.	S	<p>The heights and density zoning/ setback promoted to the local community should be what dictated by council. The current uncertainty of smokes and mirrors policy allows discretion and abuse of what was advertised and trusted by rate payers. Council should not allow one investor to cherry pick what setbacks and heights they can adhere to in order to maximise their individual investment to the disadvantage of other surrounding property investors. Consider everyone!</p>	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions;</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> </ul>
89.	S	<p>It meets the intention of the CBACP to award bonus height in proportion to community benefit offered</p> <p>It provides a measurable, auditable, robust and transparent formula for the award of bonus height that is not available from the CBACP at present</p> <p>It reflects the wishes of the community to provide a means of regulating bonus height where no regulation existed before</p> <p>It calls for a register of bonus provisions which will provide consistency and transparency in the award of bonus heights</p>	Noted.
90.	S	<p>I support the Local Planning Policy 1.20 Canning Bridge Activity Centre Plan (CBACP) - Density and Bonus Provisions, with a reservation. I am disappointed that the premise of bonus heights continues, and as a consequence, there is a further concept of "Maximum bonus height limit" granting a generous extra 30%.</p> <p>A Height limit should be just that – with limit defined as "a point or level beyond which something does not or may not extend or pass." This is what the local community expected.</p> <p>Given that the Bonus height provision still exists, it is absolutely essential that it be defined clearly, so as to not perpetuate the poor current situation where building heights seem to have no apparent limits.</p> <p>Bonus heights should be the exception in the CBACP - any consideration of bonus heights must be proportionate to Exemplary Design and extent of Community Benefit. These should be clearly evident to the "ordinary resident" in the suburb. Both criteria need to be assessed with tangible and durable measures that can be audited at time of completion and subsequently over time. For example, it is of no community benefit if spaces are allocated for public benefit (eg yoga room, or theatre) if these can be repurposed for private use subsequently. Again, there must be a clear identification of utility to the local Applecross and Mt Pleasant communities as distinct from apartment owners/renters or a vague "broader community".</p> <p>Another key consideration should be impact of any development on suburban traffic flow and parking. Even if a small proportion of apartment owners/renters have visitors, it is highly likely that all available public parking spaces within the apartment will be used up.</p> <p>The draft policy provision in relation to stranded assets is a sensible inclusion.</p> <p>The transition between zones should be strongly scrutinised, especially where H6-8 and H4 areas are in proximity to the suburban built environment. There appear to have been too many instances of applications that are grossly out of step. In any case, any of the larger complexes, in the M15 and M10 zones, will also have a profound impact on neighbouring residential areas in Applecross and Mount Pleasant through loss of privacy, visual amenity and overshadowing as well as greater parking issues, noise and traffic.</p> <p>Please note that although the website states the proposed policy is Local</p>	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions.</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul> <p>'Building height' is defined in the CBACP therefor the additional definitions as suggested is not considered necessary.</p> <p>LPP1.20 contains an extensive definition for 'Exemplary Design'</p> <p>LPP 1.20 also intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li><i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> </ul> <p>Policy numbering noted - the local planning policy being advertised is LPP1.20, however, the version adopted for advertising (as prepared by the projects Stakeholder Working Group) is incorrectly labelled LPP1.18. Should Council decide to adopt the policy it will be correctly formatted and labelled as LPP1.20.</p>

		Planning Policy 1.20 Canning Bridge Activity Centre Plan – Density and Bonus Provisions (LPP1.20), and the document name is LPP1:20, the actual linked document title box states that it is LPP1:18.	
91.	S	<p>Please see attached</p> <p>As beneficial owners, through our trust, we support the provision of not approving development which would create a stranded asset. The above property would fall into that category being isolated by common owners with the street bounded by Canning Highway, Sleat Road and Kishorn Road, Applecross. This property is 832sqm less WAPC declared Planning Control Area 153 over the land for Canning Highway Applecross – plan number 1.7973, that we estimate will reduce its size to approx. 650sqm. An area that small has limited usable value, can't and would not attract proper investment for the location and on it's own would not fit in with future developments to be constructed.</p>	<p>Noted.</p> <p>Property value is not a material planning consideration.</p>
92.	S	<p>See attached.</p> <p>CANNING BRIDGE ACTIVITY CENTRE (CBAC) BONUS HEIGHTS AND DENSITY PROVISIONS – COMMENTS ON DRAFT LPP1.20</p> <p>Given the history of approved and already constructed new buildings to date at the CBAC, it is imperative and self-evident that there should be far greater clarity and accountability on bonus heights and rules regarding greater density. After all, bonus heights do provide considerable monetary benefits for developers. Therefore, it should be equally clear that there are matching (if not greater) benefits to the community, not just in general, but to the local residents who are in the suburbs affected, and especially those who are in the CBAC or immediately adjacent.</p> <p>Adding coloured panels does not make for design excellence, if the overall structure has no real architectural excellence or harmony with the immediate built-environment surrounds. Case in point is the first of the Sabina towers.</p> <p>I see that there are estimates of the numbers of expected dwellings in the CBAC over time in the City of Melville (City). In addition to information envisaged to be published within the scope of the LPP1:20, good corporate responsibility and improved community information require the City to publish the progressive numbers of dwellings in the CBAC on a quarterly basis, starting from January 2021. The information published should disclose the numbers of dwellings constructed, under construction, and those approved to date, as at the relevant quarter. Table 1 in the Draft Policy can be a start, although the published table should provide the information by suburb in the whole of the City. This will materially improve transparency for the community and an open mechanism to monitor progress towards the target of 18,480 extra dwellings for the City.</p>	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions.</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li><i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> </ul> <p>LPP1.20 contains an extensive definition for 'Exemplary Design'</p> <p>CBACP approved developments (including dwelling numbers) are published on the City's website. This resource includes the status of each development ie approved, under construction or completed.</p>
93.	S	<p>See Attached.</p> <p>via: direct submission on the City of Melville website Dear City of Melville,</p> <p>Re: Local Planning Policy 1.20 Canning Bridge Activity Centre Plan – Density and Bonus Provisions</p> <p>A simple 'I support, or I oppose' is not conducive to an effective, community supported approach. It places people in a very difficult position. While the Policy is marginally more palatable than the previous version, it still remains far from being an acceptable Policy, continuing to ignore the original pleas of the rate payers in the area, that bonus heights should not exist.</p> <p>There remains no need for bonus heights in a well-conceived plan. They provide no utility to existing, rate-paying residents; it is not viable to draw a direct line of comparison between bonus heights and increased utility. The indirect benefit, through increased rates, would not contribute utility to existing residents in that area and any indirect benefit derived would far be surpassed by the negative coming from the towers. Additionally, bonus heights and indeed the height of buildings already constructed along the highway (e.g. Sabina) have been in bad faith to the original plans that existed when the Raffles building was conceived. They are much higher than originally communicated, are not environmentally friendly and stand as eyesores in stark contrast to the suburb – certainly not of exemplary design.</p> <p>There have been several council decisions over the past few years which have resulted in illplanned construction, in already congested areas, and residents bullied by property developers to leave their homes. City of Melville residents did not agree with these decisions or with how they were being treated and hence the councillors responsible were voted out.</p> <p>You need to listen to your constituents, scrap bonus heights and rethink your plans of creating more of a choke point on an area already choked out. Melville City spans multiple suburbs, some of which have easy train and university access, with existing infrastructure that could handle an increase in density. Why is almost 30% of the increased density being squeezed in around the choke point of Canning Bridge? Further, there is no guarantee that such unsightly structures will not make their way further into the suburbs of Applecross and Mt Pleasant. The Canning bridge area is not the area for this excessive development; bonus heights are not beneficial to anybody except the developer, and it is disheartening and frustrating that you continue to ignore your local rate payers.</p>	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li><i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions.</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> <li><i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li><i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> </ul>

94.	S	<p>Hi Jack</p> <p>I just want to make a brief submission on CBACP LPP1.20.</p> <p>I note that the link I was provided in the email from the Council went to a document notated LPP1.18 with Cr Sandford's name on it and some sections shown in mark-up. I presume this is the correct document to comment on.</p> <p>I did not use the on-line feedback form, as it requires me to say I agree/do not agree with the document. I do not want to be recorded as a blanket "agree". However, this document goes a long way to addressing my concerns.</p> <p>I make an aside that our family has shifted since I originally made comment. We were in Carron Rd. Although it was not the driving factor, I state categorically that what has been happening on the Applecross side of the CBACP contributed many of the straws that broke the camel's back in our decision to move or stay. The area is being made unliveable – the building works are a nightmare to deal with and the developments are doing nothing to attract people to the area. A feeling of being "closed in" is already occurring, and that is just with the few buildings already constructed. You can see the traffic situation deteriorating. The area looks unattractive, and the new developments have added to the overall feel of unattractiveness.</p> <p>My few comments on LPP1.20 are as follows.</p> <ol style="list-style-type: none"> <li>1. The issues of overshadowing and stranded assets are a significant matter, and I would be loath to see any watering down of these provisions.</li> <li>2. Target dwellings from Directions 2031. I note that it is the CoM that decided that the target for CBACP is 4,273 dwellings. No analysis was shown about how well the City is on track to meet the 18,480 dwellings purportedly required by the WAPC for the City as a whole by 2051. It would have been helpful to note both the target and the situation right now, for both the City as a whole, and for the CBACP. I therefore question the "justification" for the nominal target maximum dwellings in Table 1. The targets should be based on the situation now, not on the situation many years ago.</li> <li>3. Table 1 – Nominal minimum zone density, dwelling per Ha. It shows 200 dwelling for M15, and 150 for M10 etc. The step downs for M10 and H4 seems incorrect in comparison to M15 – that is M10 and H4 are allowed proportionally more dwellings per hectare for their height. On a ratio basis M10 would be 133 dwellings and H4 would be 53 dwellings. My comment about the non-proportional dwelling densities between the four zones also appears to be backed up in Table 2 – Height in metres. However, clearly I am not a planner, so perhaps I've misinterpreted these zonings??</li> <li>4. Maximum bonus height limits have only been applied to M10 and M15. Are the bonus heights from Elements 21 and 22 only applicable to these two zones? I was unable to find anything to clarify this. But otherwise, bonus heights in H6-8 and H4 should also be covered in the LPP.</li> <li>5. Element 21.4.3 – traffic statement, page 8. There is insufficient clarity here. It is not good enough to just require that the current roadway system is sufficient. There should also be a statement on traffic congestion – the policy should state maximum waiting times to enter/exit the area during peak hour, how congestion related to people accessing the businesses and dwellings (eg people turning right into a building, causing bottlenecks as the road is not wide enough to drive around the stationary vehicle) will be minimised, and sufficient nearby parking. <ol style="list-style-type: none"> <li>a. An example of where community pressure resulted in a decent solution is the Woolworths/Reynolds Rd development and the effect on traffic flows from people entering and exiting. The road improvements appear to have worked (with the notable exception of those drivers who can't read signs or who feel their needs are more important than all other road users). The point is, community pressure should not have been needed - the traffic statement should proactively deal with these issues. I am also not sure who paid for the road improvements at Woolworths – it needs to be the developer, not the community.</li> </ol> </li> <li>6. Traffic management during construction. EVERY developer should be required to provide a detailed traffic management plan for site access during construction before any height bonuses are considered. Builders need to be good neighbours. For instance, that means not flooding nearby streets with their worker's vehicles (they should be encouraged to take public transport, as most do not actually need their vehicles), it means not allowing what happened with The Precinct, with a major cross street being closed off for a considerable period of time, and it needs planning about how deliveries to site will be managed without inconveniencing neighbours (both business and residential) and road users.</li> </ol>	<p>Noted.</p> <p>Policy numbering noted - the local planning policy being advertised is LPP1.20, however, the version adopted for advertising (as prepared by the projects Stakeholder Working Group) is incorrectly labelled LPP1.18. Should Council decide to adopt the policy it will be correctly formatted and labelled as LPP1.20.</p> <ol style="list-style-type: none"> <li>1. Noted – LPP1.20 intends to - <i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> <li>2 &amp; 3: Noted – the dwelling targets contained within Table 1 of LPP1.20 have been calculated by the Stakeholder Working Group. The methodology used to calculate the figures is not detailed within the policy.</li> <li>4. Only development of properties within the M10 and M15 zones can be considered for greater height under the CBACP bonus provisions.</li> <li>5. Acceptable traffic standards such as "wait times" are beyond the scope of the policy.</li> <li>6. Noted – all development approvals include conditions requiring a Construction Management Plan / Traffic Management Plan</li> </ol>
95.	O	<p>I oppose the current density and bonus provisions as the surrounding infrastructure do not have the capacity to service the extra density. In addition, bonus height provisions will have a negatively impact on the feel of the suburb.</p>	<p>Noted.</p> <p>LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> </ul>
96.	O	<p>"Bonus provisions" is a deeply flawed concept. The planning rules should be made then strictly adhered to. There should not be any room for subverting the rules. To do so leaved all parties subject to allegations of bribery &amp; corruption. It is that simple!</p>	<p>Noted.</p>



97.	O	I only oppose the development height of up 10 and 15 storeys on The Esplanade	Noted.
98.	O	There is not a single reference anywhere on cost analysis ie: user pays. It is all very well in having highly desirous often ambitious design outcomes and these are highly commendable. However, it reminds me of driving a luxury car: we all would like one, however, can we afford it? I fear the dwellings become less affordable, hence, the changes to the current policy I cannot support without at least some build/ realestate cost analysis.	Noted.
99.	O		Noted.
100.	O	There are too many high rise buildings being built in Applecross and what with the traffic on Kintail Road, Applecross especially Kintail Road have too much traffic for a su People purchased homes when there was only a 3 height limit the city side of Kintail Road and now taller buildings are being built which cast shadows and create traffic problems with cars coming out of garages.  Put more funds into parks and sporting facilities. the 2 Ovals and facilities atTokpkins park needs upgrading	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>‘provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development’</i></li> </ul>
101.	O	Hello,  I am opposed to the granting of any variations or bonus provisions. The height and density provisions should be maintained as per the plan/scheme with no variations. This provides a clear and transparent and simple approach for everyone. It also removes the opportunity for manipulation and any appearance of inpropriety.	Noted.
102.	O	I oppose strongly due to the bonus provisions which have allowed creative misuse of the provisions. See attached  I strongly oppose due to the bonus provisions which have allowed creative misuse of the provisions. Those of us who accepted the change that was proposed in the original Canning Bridge frame only did so based solely on the number of floor levels which were advertised, very stupidly.  We therefore had no idea without having read the finer details or having a full understanding what was proposed due to the fact we don't have the expertise to have a full understanding of the generous concessions offered to developers at the expense of the local residents.  When it states 4/10/15 levels or floors that is what it means, not 20 plus as has been allowed.  The biggest objection is to the bonus provisions occur on the outer fringes where it affects residents who are across the street and are limited to a maximum of 2-3 levels/storeys	Noted.
103.	O	Having read the recent letter detailing the proposed precinct density areas, find the discretionaries too vague and open for development beyond what is pictured. I also have concerns over the area decisions as to dividing boundaries/streets and over-shadowing.	Noted.  LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>‘provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development’</i></li> </ul>
104.	O	The proposal seeks to be overly prescriptive and likely lacks enforceability in the event of a DA under the CBACP.	Noted.
105.	O	I oppose any extra height being granted as community benefits are outweighed by extra traffic etc	Noted.
106.	O	How many times will you ask. I suspect you intend to throw people off by making us feel we're not being heard. I said it before: 10=10 and 15=15. No provisions to exceed that by offering a mural or public bathrooms. Those poor people living adjacent to these oversized and unwanted apartment blocks. They didn't sign up for these shadow casting, eye sores when they decided to ove into the lovely leafy, riverside area of Applecross. You've ruined people.	Noted.
107.	O	Provision for traffic is inadequate The developments do not add to the ambience of the suburb. The local primary school will struggle to cope with increased student enrolments beyond a level intended for the suburb, Home owners are negatively impacted by high rise apartments on their boundaries. The loss is real and this is against natural justice. Developers given bonus heights should be paying compensation.	LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions.</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>‘provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other</i></li> </ul>

			<i>permanent negative impact that will be caused by a proposed development'</i>
108.	O	I write to state my objection to the councils decision to change the policy regarding M10 and M15 zoning within the CBACP. WAPC created a mandate to increase densities within your boundaries and activate the area - discouraging this would move away from these policy objectives. In our opinion this is not fair nor reasonable and does not consider the residents, such as our selves, in this precinct at all.	Noted.
109.	O	I write to state my objection to the councils decision to change the policy regarding M10 and M15 zoning within the CBACP. WAPC created a mandate to increase densities within your boundaries and activate the area - discouraging this would move away from these policy objectives. In our opinion this is not fair nor reasonable and does not consider the residents, such as our selves, in this precinct at all.	Noted.
110.	O	See attached.  My reasons are many, but mainly:  1) Councillors are moving the goal posts for ratepayers that have already been impacted by the CBACP. It's completely unfair that properties immediately adjacent to approved CBACP developments will not have the same opportunities to develop their land. These changes create several stranded assets that are no longer viable for developers. This is evidenced by my own situation where owners and investors were well advanced in creating a development proposal for 1 and 2. Unfortunately, the project is now in limbo given the additional investor risk associated with this revised LPP. At the very least I ask that the policy recognises the unique situation for landowners adjoining existing CBACP developments and exempts them from these new density and bonus height rules.  2) The policy is in completely inconsistent with the CBACP and creates confusion, risk and uncertainty for both ratepayers and developers. Councillors have an obligation to ensure that this policy does not contradict higher order planning documents such as the CBACP. Changes to density and bonus provisions should be addressed through official amendments to the CBACP. There is a real possibility here that councillors, in an attempt to appease outspoken local community groups, could kill the golden goose and stop development in its tracks. Councillors needs to accept the professional planning advice of council and take the concerns of developers seriously.  3) The LPP should concentrate and providing guidance on existing bonus provisions that require clarification and interpretation, such as solar access for adjacent properties and the criteria for design excellence. These changes and a revised public benefit definition would drastically improve the community outcomes without the need to reduce heights or densities. Previous JDAP decisions have exposed the gaping holes in the bonus provision wording and how this has been fully exploited by developers and decision makers to ensure early development proposals were rubber stamped. Just look at the Precinct approval as an example. The Expert Design Panel should be named and shamed!	<ol style="list-style-type: none"> <li>1. Noted - Property value / development risk is not a material planning consideration.</li> <li>2. Noted – LPP1.20 is a due regard documents and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</li> <li>3. Noted - LPP 1.20 intends to: <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions.</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed densification;</i></li> <li>• <i>'provide additional clarity as to the intended outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development'</i></li> </ul> </li> </ol>
111.	O	Please refer to attached submission.  Thank you for the opportunity to comment in relation to the above matter.  Urbis has prepared the following submission on behalf of Jason Wallis, Chair of the Bridgeway House Owners Body Corporate, who are the landowners of 3. This site exists as a commercial office building on a 1120sq.m allotment within the existing Canning Bridge Activity Centre Plan (CBACP).  Our site falls within the M15 zone under the CBACP and accordingly the proposed Local Planning Policy 1.20 (LPP1.20) raises considerable concerns over the future development potential of the property. Accordingly, we have provided the following comments with regard to specific provisions proposed within LPP1.20.  <b>Minimum Lot Sizes</b> The M15 zone is beginning to and will into the future largely facilitate the activity centre along Canning Highway by allowing for mixed use and residential infill development. Accordingly, we believe that the expectations for the zone have already been established through built developments such as: <ul style="list-style-type: none"> <li>• Sabina Apartments at 908 Canning Highway – 29 Floors</li> <li>• The Precinct at 893 Canning Highway – 21 Floors</li> <li>• Cirque on Kishorn – 20 Floors</li> </ul> It is submitted that these developments have established a built form precedent within the area. The imposing of a minimum lot size of 1800sq.m is considered unnecessary when other provisions such as lot boundary setbacks, overshadowing, visual privacy and bulk and scale can adequately dictate the acceptable height of a development within the context of the site and the immediate locality.	<p>Minimum Lots Sizes – Noted. The 'Minimum Lot Sizes' development provision requiring a minimum of 1800sqm for a building greater than 32metres (approximately 10 storeys) is consistent with the Element 2.2 – Form and Mass provision of the Canning Bridge Activity Centre Plan.</p> <p>Bonus Height Limits – Noted. LPP 1.20 intends to:</p> <ul style="list-style-type: none"> <li>• <i>provide additional clarity as to the intended outcomes of the CBACP with respect to the Bonus Provisions.</i></li> <li>• <i>provide additional guidance with respect to measurement and control of proposed bonus items to ensure that the merit, achievability and permanency of benefit of the bonus item is proportionate to the extent of bonus granted.</i></li> </ul> <p>Noted – LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p>

		<p>Furthermore, it is submitted that the built form outcome on smaller lots results in leaner, more sleek tower elements with minimal podiums that reduce the building bulk impact on adjoining properties. These developments often result in reduced overshadowing, greater opportunity for view corridors and better variation in design to the commonly seen podium and tower developments seen on larger lots. Examples of developments of more than 10 storeys on lots smaller than 1800sq.m within the Perth Metro Area are provided at Attachment 1 of this submission. These examples indicate that good built form outcomes can be achieved on smaller lots without adversely impacting the surrounding locality.</p> <p><b>Bonus Height Limits</b> Similarly to the above comment, the capping of the bonus height limit to 20 storeys for M15 lots is also considered unnecessary. As indicated within the policy, proposals beyond this height are likely to present inconsistency with the Desired Outcomes relating to scale, built form and building height. It is considered that these provisions are sufficient in identifying the acceptable height of a development before it becomes detrimental to the adjoining properties and surrounding locality. Reliance on these provisions instead of a maximum height limit will allow for developments to achieve greater bonus height where design excellence is achieved in accordance with the CBACP. In addition to the above, the M15 zone is also benefitted from being highly accessible by public transport, including the Canning Bridge Train Station and high-frequency bus routes along Canning Highway. Furthermore, the area is located 6km south of the CBD, making it an inner metropolitan precinct that should anticipate varying building heights, with some in excess of 20 storeys as we have already seen in the area.</p> <p>Our main concerns are that LPP1.20 will seek to introduce provisions, specifically within the M15 zone of the CBACP where a precedent has already been set for height expectations. To establish height controls now is limiting the opportunities that other sites have benefitted from previously. The existing development controls within the CBACP are considered adequate and sufficient in protecting against overdevelopment of sites that will adversely impact the surrounding locality.</p> <p>Urbis requests the City of Melville attention to the matters we raise in our submission and welcome the opportunity to meet with the City on our position should this be required.</p> <p>Thank you for the opportunity to provide comments on the LPP. Should you wish to discuss the contents of this submission, please do not hesitate to contact the undersigned.</p>	
112.	O	<p>Refer to submission attached.</p> <p>“the draft Policy is poorly constructed, is proportionally deficient, will discourage the provision of community facilities and will result in inferior development outcomes. The proposal does not address the primary concerns of the community and will disadvantage existing landowners. It is likely that built form outcomes will be less attractive and innovative as a result of the draft Policy. In summary, the draft Policy will constrain optimal outcomes, has no real planning basis and should not be adopted in it’s current form.”</p> <p><b>Stranded Assets</b> The draft Policy seeks to prohibit the approval of proposals that might result in an adjoining property not being capable of development that strictly accords with the Centre Plan provisions. This provision within the draft Policy is not required and would unduly restrict development. The Structure Plan provisions are all able to be modified to allow for development on properties that might end up remaining if all the surrounding sites are otherwise developed. Accordingly the City / JDAP is able to support development on lots that might be considered as a ‘stranded asset’. The proposal to prohibit development that might create a stranded asset would unduly influence negotiations with landowners of residual landholdings to the point where the other landowners are effectively held to ransom by one or two landowners of ‘stranded assets’. This would be similar to what has previously occurred in some Strata schemes. A regressive policy that seeks to reintroduce similar measures is not consistent with contemporary planning principals or practice and is more likely to be a constraint to optimal development outcomes than one that would promote quality development outcomes.</p> <p><b>Height Restrictions</b> The draft Policy includes a limit of any height bonus to a maximum of five (5) storeys. This is inconsistent with the provisions within the Centre Plan, which either do not include a limit or only include a limit for specific areas that abut the H8 and H4 zones. There is, therefore a clear intent that the Centre Plan contemplates bonuses greater than 5 storeys, when the building design and community facilities proposed are exemplary and beneficial. The ability for a lower order document to supersede the Centre Plan is not consistent with orderly and proper planning, and determination of a proposal would be unduly influenced by the draft Policy.</p> <p>It is also not appropriate to assign a metric based solely on height. A building with a large footprint is likely to have a different impact than a building with a smaller footprint. The draft Policy will encourage the development of buildings with maximum floorplates to help compensate for the loss of additional height bonuses. This will result in reduced view corridor opportunities, increased overshadowing, a constrained public realm and</p>	<p>Noted - LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p> <p><b>Stranded Assets – Noted.</b></p> <p><b>Height restrictions - Noted</b></p> <p><b>Inconsistent Formula Metrics – Noted.</b> The Stakeholder Working Group’s methodology and rationale for reaching the metric contained within Table 4 are not detailed in LPP1.20.</p> <p><b>Inadequate Formula Value - Noted.</b> The Stakeholder Working Group’s methodology and rationale for the formula values are not detailed in LPP1.20.</p> <p><b>Inadequate Recognition of Location Characteristics –</b> LPP1.20 intends to provide additional guidance with respect to measurement and control of proposed densification.</p> <p><b>Reduces Incentive for High Quality Development - Noted</b></p> <p><b>Failure to Consider Site-Specific Issues – Noted</b></p>

		<p>inferior design outcomes.</p> <p><b>Inconsistent Formula Metrics</b></p> <p>It is noted that the policy proposes a proportionality formula in relation to the proposed community benefits and the allocation of bonus height. Whilst we are of the view that there is some merit to this approach, a definitive merit-based approach is not possible. There is no allowance for a scope of works that might be above and beyond what might otherwise be delivered. One of the concerns with the formula contained within the draft Policy is that there has clearly been no rigour or testing undertaken during the preparation of the various metrics to provide some kind of uniformity. As an example, twenty (20) 3-Hour Free Public Car Parking bays would receive 20 Units, at a rate of 1 point per bay. One hundred (100) bays would receive a maximum of 40 points, at a rate of 0.4 points per bay. Accordingly, there is no incentive to provide a greater number of bays.</p> <p>The value ascribed to each point relative to each item has clearly not been properly weighted, reviewed or tested. As an example the installation of furniture is equivalent, accordance to the table, with the provision of 400m2 of garden space on a podium or rooftop. Equally sheltered bike storage for 30 bikes has the same potential value.</p> <p>The draft Policy should not be considered while the current table remains due to the likelihood of distorted outcomes. All the values need to be reviewed.</p> <p><b>Inadequate Formula Value</b></p> <p>The significant issue with the draft Policy is requirement to achieve 50 units per additional level and the value assigned to some of the elements. As an example, the provision of a town square / piazza of 1,000m2 is only valued at 45 units. Firstly, the cost of land is not consistent throughout the Centre Plan area. Secondly, the value of land within the Centre Plan area is significant. As such the value of land associated with the provision of a town square / piazza is likely to be in excess of \$5,000,000. A landowner would also need to factor in the opportunity costs associated with not developing this portion of the site. The low value awarded to this community benefit will mean that there is absolutely no incentive for any landowner to provide a town square / piazza. The draft Policy is therefore likely to result in the reduced community infrastructure / benefit, rather than encouraging landowners to provide an overall benefit. This will significantly impact on the existing and further landowners, and is likely to result in substantial cost implications to the City, which will be forced to fund the provision of these facilities.</p> <p>Likewise the provision of a Road Widening, Pedestrian Networks, Community Meeting Room, Car Parking, Aged Care and Hotel, which are all high priority items, also have some significant cost implications which are not adequately accounted for in the draft Policy. The draft Policy will constrain and discourage development, and the provision of community facilities and optimal outcomes.</p> <p><b>Inadequate Recognition of Location Characteristics</b></p> <p>The draft Policy does not factor in the location of the building / development, but rather seeks to mandate a blanket approach to the assessment of each development. A building located within the central portion of the Centre Plan area, such as on the Subject Lots, will have minimal impact when compared to a building located adjacent to H8 and H4 zones. The ability for larger lots to accommodate larger, superior development outcomes also needs to be considered and promoted.</p> <p>There is also significant benefit associated with concentrating development in close proximity to Canning Highway and the rail station. Additional development within these areas should be encouraged rather than constrained. This would allow for lower scale development towards the frame of the Centre Plan, as the majority of the planned population growth could be accommodated with the core of the Centre thereby achieving reduced impacts of density infill towards the outer precincts of the Centre Plan.</p> <p>The draft Policy should be amended to encourage additional height and density in the M15 area.</p> <p><b>Reduces Incentive for High Quality Development</b></p> <p>The Centre Plan is currently designed to encourage high quality design by granting of building height bonuses to developments which meet certain requirements. These requirements are already challenging and require an exemplary built form. Placing a cap on building height does a disservice to the Centre Plan by reducing the incentive to strive for high quality design. Building height caps do not encourage high-quality built form outcomes, and are not an appropriate way to guide development. Further, limiting building height absolutely will stifle development and would potentially result in poor built form outcomes. For example, such limits encourage developers to alternatively ‘build out’ the lot, and reduce their ability to achieve a design to maximise view corridors, maximising communal open space, minimise overshadowing and contribute to the public realm.</p> <p>We are also of the view that the height of a development is not directly proportionate to its impact. After a certain height, well below 15 or 20 storeys, additional height has little further impact on a locality. At this height, high quality design is much more important to ensure that amenity is achieved.</p> <p>Lastly, by unduly limiting development in such a way, the draft Policy also seeks to limit the potential for and viability of community benefits included in many major developments. The reasons for this are two-fold; firstly, such limitation will reduce the incentive to strive for a high-quality development which includes the provision of community benefits, as per the Centre Plan</p>
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		<p>bonus provisions. Secondly, it will limit the economic viability of such development, which will limit their ability to provide community benefits at a cost to the developer. As noted previously this is likely to increase the future financial burden to the City by having to provide community infrastructure from rates revenue.</p> <p><b>Failure to Consider Site-Specific Issues</b></p> <p>The draft Policy includes a blanket cap on building height across all lots within the M10 and M15 Zones. We are of the view that this undermines the intention of the Centre Plan which, as it currently exists, allows for nuanced consideration of developments based on a range of design and planning considerations.</p> <p>Specifically, the draft Policy does not allow for site-specific considerations such as location, lot size, proximity to activity nodes, view corridors, or benefits to the community. We are of the view that the building height should not be indiscriminately capped, especially for locations identified for landmark buildings under the Centre Plan.</p> <p>The Centre Plan states the following with regard to landmark sites: <i>Key landmark buildings will be encouraged near the intersection of Sleat Road and Canning Highway where the ‘through’ commuter first comes upon the rise in Canning Highway affording views across the centre, and the existing Raffles building will form the landmark and way finding feature of the river’s edge. An additional opportunity does exist, subject to an alignment of planning and design of private development, to establish a pedestrian walkway spanning across Canning Highway between buildings at approximately the location of the existing overpass. Whilst challenging, this would be an outstanding outcome for the CBACP area.</i></p> <p>The Subject Lots provide an opportunity to achieve the realisation of a landmark development, however a landmark development is unlikely to be achieved should the draft Policy be adopted.</p> <p>The Subject Lots are identified as a key public space and pedestrian crossing within the Centre Plan, similar to a landmark location. The Subject Lots provide an opportunity to frame the corner of Canning Highway, Kishorn Road and Sleat Road, providing a high amenity residential or mixed-use development that addresses the adjacent public space, and has views to the Canning River and additional landmark location – Raffles Hotel. We are of the view that greater height should be permitted to sites identified as landmark locations within the City.</p> <p><b>Conclusion</b></p> <p>The draft Policy does not provide a well-considered, logical and beneficial approach to assessing development within the Centre Plan area. It appears that the intent of the draft Policy is to discourage the provision of additional height. This seems to be counter-intuitive to the State’s desire for the development of Activity Centres, particularly those adjacent to key transport infrastructure. The draft Policy appears to be focussed on constraining development by stealth, and is not consistent with the intent of the Centre Plan. The draft Policy is not consistent with the Centre Plan and it is not orderly or proper to adopt a Local Planning Policy that seeks to unduly curtail the higher-order planning document.</p> <p>The draft Policy needs to be completely re-worked to ensure that development within the Centre is promoted, and facilitated particularly within the core portions of the Centre, such as the Subject Lots.</p> <p>The following issues need to be included or amended:</p> <ul style="list-style-type: none"><li>- There should not be bonus limits within the core of the M15 zone;</li><li>- There should be acknowledgement that land value is not consistent throughout the Centre Plan;</li><li>- There should be acknowledgement that the benefits and / or impacts of additional height is not consistent throughout the Centre Plan area, and that additional allowances should be provided within the core of the M15 zone;</li><li>- The scale of the development and the size of the development site should be factored in to the assessment;</li><li>- The Unit value, if retained, should be reworked so as to provide appropriate weighting and consistency, albeit subject to site specific characteristics;</li><li>- The draft Policy should increase the incentive for the provision of high quality development, not seek to uniformly restrict and constrain development; and</li><li>- The Policy should seek to encourage the provision of community benefit rather than focus on height limits.</li></ul> <p>The proposed amendment undermines the intention of the Centre Plan, and is an undue and unanticipated step backward. The proposed amendment undermines many of the investment decisions made on properties within the Centre Plan area.</p> <p>We request the City explore other options to quantify how and when additional height is appropriate in order to encourage high quality outcomes, rather than restrict the design parameters.</p>	
113.	O	<p>Refer attached submission detailing opposition to Local Planning Policy 1.20</p> <p><b>Executive Summary</b></p> <p>We strongly oppose the measures outlined in LPP1.20 which restrict the development potential of sites within the CBACP area and urge the City to refuse and abandon this policy.</p> <p>The following submission outlines in detail the impacts of the policy on the CBACP area and therefore why it should not go ahead. Our key objections are as following:</p> <ul style="list-style-type: none"><li>• The policy is a departure from the recent amendment to the Canning Bridge Activity Centre Plan and is reactive in nature.</li></ul>	<p>Noted.</p> <p><b>DEPARTURE FROM RECENT AMENDMENT TO CANNING BRIDGE ACTIVITY CENTRE PLAN</b></p> <p>Noted. LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p>

		<ul style="list-style-type: none"> <li>• The policy includes a number of measures which seek to restrict height bonuses, which does not necessarily ensure better outcomes for the community.</li> <li>• Even though the policy nominates a five storey bonus height for the M15 zone, this is not practically capable of being achieved due to the onerous unit system for community benefits.</li> <li>• The policy introduces a maximum dwelling density per hectare which is not based on sound town planning principles.</li> <li>• The policy is poorly worded and difficult to interpret, leading to confusion for the community, developers and decision makers around development control.</li> </ul>	<p><b>LIMITING OF HEIGHT BONUSES IN THE M10 ZONE</b>  <b>Community Benefits Points System</b> – It is noted that the points system contained in Table 4 is onerous. A maximum of 290 ‘units’ is available if each of the eleven Element 22 Community Benefits were to be provided by a development effectively resulting in a development within the M15 zone needing to provide all 11 community benefits to be considered for the maximum available height bonus of 5 storeys (50 units per storey).  <b>Minimum Lot Sizes</b> – Noted  <b>Impacts of building height on the locality</b> – Noted  <b>Community Expectations</b> – Noted</p> <p><b>MAXIMUM DWELLING DENSITY</b>  Noted. LPP1.20 intends to provide additional guidance with respect to measurement and control of proposed densification. The Stakeholder Working Group’s methodology and rationale for the formula values are not detailed in LPP1.20.</p> <p><b>LEGIBILITY</b> - Noted</p>
114.	O	<p>Refer attached submission.</p> <p><b>Executive Summary</b>  We strongly oppose the measures outlined in LPP1.20 which restrict the development potential of sites within the CBACP area and urge the City to refuse and abandon this policy.  The following submission outlines in detail the impacts of the policy on the CBACP area and therefore why it should not go ahead. Our key objections are as following:</p> <ul style="list-style-type: none"> <li>• The policy is a departure from the recent amendment to the Canning Bridge Activity Centre Plan and is reactive in nature.</li> <li>• The policy includes a number of measures which seek to restrict height bonuses, which does not necessarily ensure better outcomes for the community.</li> <li>• The policy introduces a maximum dwelling density per hectare which is not based on sound town planning principles.</li> <li>• The policy is poorly worded and difficult to interpret, leading to confusion for the community, developers and decision makers around development control.</li> </ul>	<p>Noted.</p> <p><b>DEPARTURE FROM RECENT AMENDMENT TO CANNING BRIDGE ACTIVITY CENTRE PLAN</b>  Noted. LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p> <p><b>LIMITING OF HEIGHT BONUSES IN THE M10 ZONE</b>  <b>Community Benefits Points System</b> – It is noted that the points system contained in Table 4 is onerous. A maximum of 290 ‘units’ is available if each of the eleven Element 22 Community Benefits were to be provided by a development effectively resulting in a development within the M15 zone needing to provide all 11 community benefits to be considered for the maximum available height bonus of 5 storeys (50 units per storey).  <b>Minimum Lot Sizes</b> – Noted  <b>Impacts of building height on the locality</b> – Noted  <b>The height caps lack appreciation of context</b> - Noted  <b>Community Expectations</b> – Noted</p> <p><b>MAXIMUM DWELLING DENSITY</b>  Noted. LPP1.20 intends to provide additional guidance with respect to measurement and control of proposed densification. The Stakeholder Working Group’s methodology and rationale for the formula values are not detailed in LPP1.20.</p> <p><b>LEGIBILITY</b> - Noted</p>
115.	O	<p>See Attached.</p> <p><b>DRAFT LOCAL PLANNING POLICY 1.20 CANNING BRIDGE ACTIVITY CENTRE PLAN - DENSITY AND BONUS PROVISIONS - SUBMISSION</b></p> <p><sup>4</sup>, on behalf of <sup>5</sup> and <sup>6</sup> as the landowners of <sup>7</sup> and <sup>8</sup>, is pleased to provide the following submission to the City of Melville (the City) with regard to draft Local Planning Policy 1.20 Canning Bridge Activity Centre Plan - Density and Bonus Provisions (draft CBACP policy) currently open for public consultation.</p> <p><b>Objection to the Role of the Draft Policy</b>  Fundamental objection is raised to the draft CBACP Policy, firstly on the basis that interpretation of an Activity Centre Plan (ACP) through a Local Planning Policy is contrary to orderly and proper planning. Any clarification or supplementary provision required to support the operation of the CBACP should be addressed through an amendment to the ACP itself and applied consistently across the whole CBACP area. This is particularly relevant noting that the City is currently progressing a wholesale review of the CBACP. Rather than pursue a Policy to support the operation of the CBACP, an orderly and proper planning approach would involve incorporating the intent and provisions of the draft Policy, into the review of the ACP.</p> <p>It is considered the intent of the draft CBACP Policy and the proposed supplementary guidance and provisions that it contains, undermine the operation of the CBACP and will add an unnecessary layer of complexity to the planning framework applicable to the area. The proposed provisions do not actively encourage redevelopment of the precinct and seek to restrict development potential under the guise of preventing ‘over densification’ and unacceptable amenity impacts to the <i>existing</i> character of the precinct. This in turn creates uncertainty for future development and will result in the envisaged outcomes for the precinct being unfulfilled. The draft CBACP Policy states the primary objectives of the CBACP area is to increase the dwelling densities within the City of Melville CBACP area to a minimum of 4,273 dwellings and to the maintain the amenity of the area. This statement is not supported as the CBACP is guided first and foremost by the Canning Bridge Precinct Vision Statement and the 9 CBACP objectives which gives no preference to ‘density’ or amenity as primary considerations above others</p>	<p>Noted.</p> <p><b>Objection to the Role of the Draft Policy</b>  Noted. LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p> <p><b>WAPC Decision</b> – Noted  <b>Stranded Asset</b> – Noted  <b>Development Density</b> - Noted</p>

		<p>listed.</p> <p>The draft CBACP Policy further states that ‘<i>over densification of any area in the CBACP is inconsistent with these objectives, cannot be supported and must be actively prevented</i>’. The policy appears to incorrectly correlate the ‘density’ of a proposal to the built form outcome, and specifically the building height, that will result. The concept that the ‘density’ of a development directly corresponds to its appropriateness in its setting does not consider all matters under Clause 67 of the deemed provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> to be assessed with regard to the planning merits of a development proposal. This statement is therefore not supported. In this regard, objection is made to this subjective commentary in the Introduction of the draft Policy, specifically the emotive language used, such as the term “<i>over densification</i>”, and the suggestion that this should be “<i>actively prevented</i>”. These are ambiguous terms, and are not appropriate language for a local government planning policy intended to support a State Government activity centre plan. It is therefore suggested that the whole of the paragraph beginning with “<i>In order to achieve...</i>” should be deleted. One of the objectives of the draft Policy is ‘<i>to provide additional clarity as to the indented outcomes of the CBACP with respect to improved amenity within the CBACP and impact on the amenity of areas outside the CBACP where there is an adverse impact such as loss of privacy from overlooking, overshadowing or any other permanent negative impact that will be caused by a proposed development</i>’. The wording of this objective is obtuse and has potential to be used by decision-makers to unreasonably reject or limit development based on a perceived impact to the amenity of an area or property within or outside the CBACP area. The CBACP clearly articulates the development aspirations and future character intended for the CBACP area. The nature of intensification of development within the activity centre will automatically result in additional overlooking and overshadowing, however the CBACP is the appropriate instrument to be used to measure the extent the proposal is consistent with the Desired Outcomes of each Element. This is a fundamental concern about the role of the draft Policy, and its potential to conflict with the intent, provisions and operation of the CBACP.</p> <p><b>WAPC Consideration</b></p> <p>Clause 4(1)(b) of the ‘Deemed Provisions for Local Planning Schemes’ as set out in the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> states that if a proposed local planning policy is inconsistent with any State planning policy, then the local government is to give notice of the proposed policy to the WA Planning Commission (WAPC). Clause 4(3A) of the proposed amendments to the ‘Deemed Provisions’ (advertised by the WAPC in Q3 2020) states that a local government shall not proceed with a proposed local planning policy where it amends a deemed to comply requirement of the Residential Design Codes, without the approval for the WAPC. It therefore follows that should the City intend to progress with the draft Policy, this should be referred to the WAPC for consideration, given the proposed inter-relationship with the CBACP, a document for which the WAPC is the decision maker.</p> <p><b>Stranded Asset</b></p> <p>Objection is raised to the inclusion of a requirement which seeks to prevent development which would result in the creation of a ‘stranded asset’. The policy defines a stranded asset as ‘<i>any adjoining property which if not included in the proposed development becomes isolated and due to the remaining size will be unable to be developed in accordance with the CBACP provisions</i>’. The definition of a ‘stranded asset’ and methodology to assess the extent to which a ‘stranded’ site could be developed in accordance with the CBACP is subjective and is not supported. The provision appears to be created for landowners who do not wish to redevelop, to object to a neighbouring development proposal on the basis of their property not being included. This provision has potential to sterilise development sites in circumstances where a neighbouring site is unwilling to redevelop. These considerations are outside of the scope and control of the planning framework and are not supported. The CBACP already includes provisions to coordinate land assembly and encourage amalgamation through the use of minimum lot sizes relating to building height bonuses. It is additionally noted, the terminology ‘stranded asset’ is typically used to describe assets that have suffered devaluations which is an invalid planning consideration.</p> <p><b>Development Density</b></p> <p>Table 1 of the draft CBACP Policy sets out minimum and maximum densities for developments based on the applied zoning. The draft Policy uses a largely unsophisticated approach to apply density requirements (using a density per ha approach for each zone) corresponding to the overall dwelling target to be achieved in the precinct. The draft CBACP Policy does not consider site specific characteristics affecting redevelopment potential across the precinct to determine the likelihood the dwelling targets will be able to be achieved in the specified timeframe. Such a fundamental component of the CBACP, being the densities which underpin the CBACP objectives, should not be replicated or included the draft Policy, instead this should appropriately be included in the CBACP itself, particularly noting the wholesale review that is currently underway.</p> <p><b>Performance Assessment of Bonus Items</b></p> <p>The draft Policy seeks to implement additional criteria under Table 3 which the Design Advisory Group must consider and identify for a development to qualify as an exemplary design. The ‘Features of Exemplary Design’ contained within Table 3 are ambiguous and for a number of ‘Requirements’ do not provide appropriate details with regard to how they can be achieved (e.g.</p>
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		<p>skyline and silhouette). The ‘Good Neighbour principles’ and ‘Solar Access and privacy for adjacent properties’ are specifically not supported as they list ‘Prevention of overshadowing’ and ‘demonstration that building design entirely avoids overshadowing and overlooking’ as criteria which cannot be achieved for any development within the CBACP precinct. These proposed provisions fundamentally conflict with the CBACP. Similarly, Table 4 of the draft Policy provides a list of community benefits corresponding to Element 22 of the CBACP which must be provided to achieve bonus height. There is very minimal detail provided for each community benefit which results in uncertainty and openness of interpretation which is inconsistent with the purpose of the policy. Additionally, the criteria of 50 points to achieve each additional storey is considered unreasonable and largely unable to be achieved based on the points proposed for each element. This proposed points system undermines the role of the Design Review Panel, by suggesting an overly quantitative and arbitrary approach to the assessment of proposed community benefits, rather than a holistic and qualitative assessment of the potential inclusion of such community benefit features in a development.</p> <p><b>Summary</b>  <b>element</b> has reviewed the City’s draft Local Planning Policy 1.20 Canning Bridge Activity Centre Plan - Density and Bonus Provisions currently open for public comment. Fundamental objection is raised to the intended role of the draft Policy itself, its potential to conflict with the CBACP, and a number of provisions relating to stranded assets, maximum density and measures to achieve bonus building height. It is considered the intent of the draft CBACP policy undermines the operation of the CBACP and that the matters raised should appropriately be addressed through an amendment to the ACP itself. This is particularly timely noting that the City is currently progressing a wholesale review of the CBACP.</p> <p>We trust our submission will be taken into consideration by the City, and that the draft Policy will be appropriately referred to the WAPC. Please do not hesitate to contact David Read or the undersigned should you wish to discuss any of the above in further detail.</p>	
116.	O	<p>See Attached.</p> <p><b>Executive Summary</b>  We strongly oppose the measures outlined in LPP1.20 which restrict the development potential of sites within the CBACP area and urge the City to refuse and abandon this policy.  The following submission outlines in detail the impacts of the policy on the CBACP area and therefore why it should not go ahead. Our key objections are as following:</p> <ul style="list-style-type: none"> <li>• The policy is a departure from the recent amendment to the Canning Bridge Activity Centre Plan and is reactive in nature.</li> <li>• The policy includes a number of measures which seek to restrict height bonuses, which does not necessarily ensure better outcomes for the community.</li> <li>• The policy introduces a maximum dwelling density per hectare which is not based on sound town planning principles.</li> <li>• The policy is poorly worded and difficult to interpret, leading to confusion for the community, developers and decision makers around development control.</li> </ul>	<p>Noted.</p> <p><b>INCONSISTENT WITH THE CBACP</b>  Noted. LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p> <p><b>UNDERMINES WAPC DECISION ON AMENDMENT NO.4 TO CBACP</b>  Noted. LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p> <p><b>LEGIBILITY</b> - Noted</p> <p><b>LPP1.20 NOT BASED ON SOUND PLANNING PRINCIPLES</b> - Noted</p> <p><b>LIMITING OF HEIGHT BONUSES IN THE M15 ZONE</b> - Noted</p> <p><b>MAXIMUM DWELLING DENSITY</b> - Noted. LPP1.20 intends to provide additional guidance with respect to measurement and control of proposed densification. The Stakeholder Working Group’s methodology and rationale for the formula values are not detailed in LPP1.20.</p> <p><b>FALSE SENSE OF SECURITY</b> – Noted. LPP1.20 is a due regard document and is required to achieve consistency with higher order planning instruments (in this instance the Canning Bridge Activity Centre Plan). As a low order planning instrument if the LPP is deemed by decision makers to be inconsistent with higher order instruments it may be given limited regard in the decision making process.</p> <p><b>COSTS TO THE CITY OF MELVILLE</b> – Noted</p>
117.	N	<p>See Attached.</p> <p>Given the above assessment, I neither supports or objects to the proposal subject to the advice provided.</p>	<p>Noted.</p>