

Golden Gateway Local Structure Plan Schedule of Recommended Modifications

LSP Section	Recommended modifications	Justification
General/ Manner and Form	1 (a) Rename the document to Precinct Structure Plan. (b) Reformat the document into a Precinct Structure Plan including, but not limited to the following: • Include structure plan purpose/ vision and set of high-level objectives for the structure plan that are presented and align with the 10 design principles set within SPP7.0. Relevant objectives would include: ○ <i>Reducing car dependence by minimising the provision of car parking in new developments and support active and sustainability mode of transport.</i> ○ <i>Promote pedestrian and cycle network connectivity.</i> ○ <i>Improve people's connection to the Swan River.</i> ○ <i>Create accessible, quality public realm within the precinct, including private open space that is functional and contributes to activating streets and improving accessibility.</i> ○ <i>Ensure heritage values are retained.</i> ○ <i>Optimize value of strategic sites i.e. gateway sites.</i> ○ <i>Promote higher density development in the form of mixed multiple dwelling development.</i> ○ <i>Building heights consistent with the desired scale and form of the structure plans vision with a gradual transitioning of heights.</i> ○ <i>Provide for a diverse mix of uses at ground floor which are compatible with residential use to encourage employment opportunities and activity along streets.</i> ○ <i>Incorporating environmentally sustainable design and initiatives into all development that reduces energy consumptions, water, incorporates water sensitive urban design.</i>	The LSP primarily relates to built form controls (height, setbacks, building separation, plot ratio, etc) and includes additional density bonuses which is the role of a PSP. From a manner and form perspective, Part 1 should outline the structure plan purpose and key objectives to help inform future subdivision and development. This is particularly critical as the structure plan has built form controls/ development provisions relating to density bonuses that envisages exercise of discretion. The LSP refers to the Draft LDP however this is outdated, was not endorsed and recent policy such as SPP7.0 and SPP7.2 remove the need for specific provisions.

	(c) Include sub section that refers to relationships to other policies in particular R Codes . (d) Include sub section on exercise of discretion based on future development satisfying: ○ the objectives of the plan (above); ○ is of good design quality, achieves SPP7 objectives, approved by design review panel; and ○ is consistent with intended scale and character, does impact heritage and local amenity. (e) Remove all references to the Ascot Kilns LDP and update content to better align with the Ascot Racecourse Precinct Structure Plan (Ascot PSP).	
Executive summary	2. Review and modify the table to ensure it does not include items that are to be covered by Ascot PSP and the amount of POS reflects any designation of POS within the Ascot Kilns site.	It is noted the table includes data and items that relate to Ascot PSP such as retail floor space which should be removed.
3. Staging	3. (a) Review purpose and comments in the staging triggers table 1. (b) Delete reference to ‘no subdivisions and or development to occur until planning framework is in effect for Ascot Kilns’; and “development may be permitted to occur prior to upgrades subject to contributions towards upgrade works in cash or in kind” (c) In Table 1 include practical timeframes (short/ medium/ long term) to upgrade roads over time as development occurs, land tenure/ assembly particularly in relation to Ascot Kilns.	Table 1 includes comments regarding <i>no subdivision or development to be approved on Ascot Kilns site until planning framework is in effect</i>; and for development to occur subject to contribution towards upgrades of road. Regarding Ascot Kilns this is likely referring to the need for an LDP which is no longer required. Regarding road upgrades there currently is no mechanism to impose cash contributions towards road upgrades.
4. Subdivision and development requirements (General)	4. Include subdivision requirements for guiding future subdivision that would facilitate development consistent with the objectives and visions (required as outlined above) of the structure plan such as: ○ <i>Encourage amalgamation and / or rationalizing of boundaries of lots to create potential for larger scale development and facilitate gradual transitioning of built form outcomes</i>	The LSP consists of predominantly large irregular shaped lots in fragmented ownership but includes no objectives and or requirements that would inform future design of lots. The LSP would benefit from future subdivision to rationalize boundaries, to improve connectivity, remove the need for direct access from Great Eastern Highway and inform better built form outcomes and factor the need for gradual transitioning of heights.

	○ <i>Discourage subdivision into smaller lots that would result in undesirable land uses and built form (for instance group dwelling) and impact the ability for adjoining lots to be developed</i> ○ <i>Discourage subdivision of ascot kiln site</i> ○ <i>Encourage subdivision that create additional publicly accessible links that would improve connectivity and remove need for direct access off Great Eastern Highway</i>	
<u>4.1.1 Mixed Use (R-ACO)</u>	5. Move and consolidate objectives into separate LSP objectives as discussed above.	As discussed above, objectives for the whole LSP and individual precincts are required rather than having an objective for a specific land use zoning. Further the objective for the provision of local retail and commercial facilities within the broader locality appears to be referring to Ascot PSP which has its own objectives and set of requirements.
4.1.1.1 Land Use permissibility	6. (a) On finalization of a Local scheme amendment, remove references to LPS 15 zoning and include guidance on preferred land uses for each precinct to supplement the scheme's land use permissibility. (b) Include provision that excludes land uses that would result in a built form inconsistent with the vision of the LSP such as group dwelling development.	The LSP provides no guidance on the types of preferred land use for each precinct. If the intent is for the different precincts to have distinguishing characteristics/ land-uses, then the structure plan should include further guidance. For instance, land uses fronting Great Eastern Highway will likely be different for land uses on Daly Street that has limited passing trade. The structure plan should factor the role of tourism sites due to proximity of river, racecourse and links to airport. Further the intent for the structure plan is to facilitate higher density mix use multi dwellings, however there is a risk that grouped dwellings will be more viable option for some of the smaller lots sized around 1000m² which would impact ability for creation of multiple dwellings on adjoining lots.
4.1.1.3 Density	7. Delete section.	This section is superfluous.
4.1.2 Park and Recreation	8. (a) Include requirement(s) that informs the creation of private open spaces such as it needing to be functional and contributes to activating streets and improving accessibility.	Noting the lack of POS and intent for development to provide publicly accessible private open space, which is generally supported, additional design requirements to inform this would be beneficial to ensure what is provided is accessible and functional.

	(b) Include provision for some form of POS within the Ascot Kilns site that provides a connection to the proposed POS on Daly street and amend LSP plan 1 accordingly.	A green link from Daly street to Ascot Kilns should be formally acknowledged and there is scope for lots abutting the proposed POS on Daly Street to incorporate additional POS (via a density bonus) and or contribute to the development to make the space more functional.
4.1.3 Local Roads	9. Replace comment that no additional roads are anticipated and if introduced it would need to be 20m wide, with a requirement that encourages the creation of additional links if it improves connectivity, removes direct access off Great Eastern Highway, creates opportunity for public realm and or facilitate the servicing requirements for business premises.	No major changes are proposed to the road network other than closing Daly Street. Whilst closing Daly Street converted into a cul-de-sac, is in line with the Main Roads Western Australia vehicle access strategy and provides an opportunity to create a POS, it does not improve connectivity and may create internal issues with vehicle manoeuvring and serving / waste management. There is also scope for the structure plan to encourage indicative additional links to Grandstand Rd and/or Hargreaves St such as the creation of a loop road for vehicle access / servicing and or pedestrian access way (laneway development); and for improved pedestrian access to the future local centre within the Ascot PSP. Noting the concerns regarding private ownership of land there is scope for this to become a community benefit tied to density bonus if being retained. Requiring any potential future road to be a 20m wide road is not necessary particularly within a high-density mixed-use environment and limits the opportunity for small links such as laneway access.
4.2.1 Precinct development requirements	10. Rename to Precinct objectives and include more specific precinct objectives that distinguish the precincts for instance: Great Eastern Highway – preferred land uses, use of good quality footpaths on the corridor to encourage street activation, vehicle access from secondary streets, appropriate transitioning of building height and use of gateway sites.	There is little to distinguish between most precincts and majority of statements could be incorporated into either the broader LSP objectives at the beginning of the document or more detailed development requirements which are lacking in the LSP.
Ascot Kilns	11. (a) Remove reference to the LDP and include a set of precinct objectives and / design principles such as: ○ <i>Retention of the landmark values of Ascot Kilns through protection of significant views and vistas.</i>	The LSP refers to the Draft LDP however this is outdated, was not endorsed and recent policy such as SPP7.0 and SPP7.2 remove the need for specific provisions.

	○ <i>Ensure building heights respond to the character and proportions of the surrounding streets, public realm, and heritage structures.</i> ○ <i>Transitioning of height needs to factor landmark values of Ascot Kilns including protection of significant views and vistas; and surrounding existing and proposed residential development. Lower scale development and landscape treatments around the kilns and chimney stacks, where adverse heritage impacts are better able to be minimised.</i> ○ <i>Any carparking located outside of the significant view corridors.</i> ○ <i>Activation of the ground plane around the Kilns cluster to facilitate future interpretation and public access in or around the heritage artefacts.</i> ○ <i>Provide public access and connectivity through the Ascot Kilns site which align with existing routes.</i> ○ <i>Contribute to open space through the provision of a landscaped interface with adjacent areas.</i> ○ <i>Retained roof cover protection over the Kilns cluster.</i> ○ <i>Provision for bonus height for new development where it can be demonstrated to the satisfaction of the Heritage Council that sustainable conservation and activation of the Kilns site would be achieved through integrated development within the Kilns precinct area (for instance publicly access open space).</i> ○ <i>Suitable legal mechanisms may be required to ensure public access to the heritage structures is retained.</i> (b) that the term ‘European heritage’ should be revised to ‘historic heritage’ in the final document and that additional context is provided to articulate the statutory requirement for proposals affecting State Registered places to be referred to the Heritage Council for advice.	The requirement for an LDP may still be deemed necessary if the site is to be subdivided. The LSP refers to historic heritage throughout as ‘European Heritage’ and there is limited discussion on the statutory requirements applicable to heritage-protected places within the structure area.
4.2.1.2	12. (a) Rename to Precinct Primary controls	Table 2 includes requirements that are either superfluous (max setbacks), not specific (side and rear setbacks), limits development (minimum tower

Precinct Standards and Requirement (Table 2)	(b) Amend Table 2 as follows: - Remove provisions relating to 'minimum' podium heights, max street setbacks. - Update setbacks to ensure it captures primary and secondary street setbacks, rear and side setbacks. - Where setbacks are varied from the R-Codes these should be specified at the beginning of the document under relationship to State Planning Frameworks. - Remove reference to the requirement for podiums for buildings above 3 storeys. - Include primary controls for Ascot Kilns and remove reference to the LDP. This is to include an R Coding of R-AC3; and base of height of 6 storeys and additional 2 storey bonus height. - Remove reference for Ascot Kilns to provide 10% POS. - Include footnote regarding consultation with Perth Airport regarding heights.	heights) and assumes that tower and podium is the only typology suitable for the site. Table 2 also refers to Ascot Kilns LDP which is proposed to be removed with suitable provisions that align with the intent of the LDP. Regarding the reference to the provision of 10% POS for ascot Kilns site any POS for the site should be reflected in the Plan 1: Structure Plan Map and or allowed to be provided as a community benefit. Further need for POS is also somewhat negated by locality to river foreshore, Belmont charitable trust land- which is subject to further planning. Notwithstanding, the Ascot Kilns location provides the opportunity to create POS linking with the POS on Daly Street and the Belmont Charitable Trust land. This is to be included within 4.1.2 Park and Recreation, 4.2.1 Precinct objectives and LSP map (Plan 1).
<u>4.2.2 General development requirements</u>	13. Amend paragraph to reflect the ability for the exercise of discretion in applying the LSP (PSP) provisions to be considered by the Responsible Authority if the LSP objectives are still met.	The LSP should generally not be advising of variations to standards and requirements of scheme provisions and relevant SPP's unless the provision specifically outlines a variation.
<u>4.2.2.1 Parking</u>	14. (a) Include the provision of encouraging electric vehicle charging bays within the development; and / or provision of shared sustainable transport measures as a means of varying car parking provision. (b) Include additional guidance on the design of parking that factors the need to sleeve parking from street.	No guidance provided on the design and location of car parking i.e. prevent parking at the front and encourage sleeving i.e. onsite parking located behind building façade and screen from public view. There is also the opportunity to include provisions relating to the provision electric vehicle charging bays and infrastructure within this section without mandating it as a requirement tied to density bonus noting the section already encourages 'innovative approaches to parking'.
<u>4.2.2.2 Building Height</u>	15. (a) Rename to 'Density Bonus' (b) Amend current text relating to building heights so that an additional 5 stories for the structure plan area (2 storeys for Ascot Kilns site) can be considered where:	The general intent of additional height, promoting design excellence and sustainability measure is supported however the criteria provided is too rigid and the proportionality between the development uplift value and the sustainability requirements has not been adequately demonstrated. This also does not factor the consultant's feasibility report submitted that

	○ A) A development is demonstrated to achieve the principles of good design as set out in State Planning Policy 7 – Design of the Built Environment, and demonstrably exceed at least one principle of most relevance to the site’s context on the advice of the City of Belmont Design Review Panel; and/ or State Design Review Panel; AND ○ B) A community benefit contribution is provided as part of a development; ○ <i>In relation to (B) a community benefit shall be agreed by the responsible authority and may include (but are not limited to) the following:</i> ▪ <i>provision of 10% public opens space and or publicly accessible private open space; or</i> ▪ <i>improve internal connectivity through the provision of additional roads and or public accessways that connect to existing roads.</i> (c) Include a separate subsection to inform the provisions within Table 2 and which elaborates on the LSP objectives and addresses the need to: ○ Transition heights and modulation for building form ○ Design guidance to inform additional heights for Ascot Kilns including: ▪ Demonstrating heights is not detrimental to the heritage and does not detract from the landmark status or interfere with key view corridors ○ Street setbacks support desire streetscape character and land-use ○ Provide a clear transitioning between public and private realm	indicates development to the base heights is not feasible in the short term. The lack of POS within the LSP area and ability for the provision of publicly accessible private realm for the larger scale lots should be acknowledged as a true community benefit, in addition for the ability to improve connectivity within the site as previously discussed. There is nothing preventing the structure plan from incorporating objectives and provisions that encourage more sustainability requirements for instance R-Codes Volume 2: A4.15.1 (a) specifies to incorporate at least one significant energy efficiency initiative within the development that exceeds minimum practice. However, any proposed requirements would need to be flexible to factor different scales of development, site constraints, feasibility and or provision of other community benefits such as POS, additional linkages, and other in-kind payments.
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	○ Building setbacks achieve R code objectives for visual privacy, solar, building separation, provision landscaping, deep soil areas that support provision of trees. (d) Include sub section and provisions relating to sustainability measures that are not tied specifically to bonus heights and could include a minimum sustainability certification. (e) Remove specific requirements for the provision of an additional tree, solar panels/ double glazing.	
5.1 Scheme amendment	16. Delete section.	A scheme amendment will be required prior to the final WAPC endorsement and so this structure plan section will become redundant
<u>5.2</u> Infrastructure Strategy	17. Delete section.	The City advises it is not intending on establishing an appropriate funding strategy for the provision of infrastructure within the Structure Plan Area. SPP3.4 implies that establishing the need and nexus of additional infrastructure or uncertainty around future growth rate and delivery of infrastructure would make a Development Contribution Plan difficult to establish.
<u>5.3</u> Bush Fire	18. Delete this section.	The BMP was undertaken in 2018, notwithstanding it identifies that no area within the LSP (excluding Belmont Charitable trust land) is impacted and or would require any bushfire measures. No sites marked for future development would require a Notification on title or LDP as not within a bushfire prone area.
5.5 Noise	19. Amend to include a general statement that the site is located within the trigger distance of a road captured by SPP5.4 and therefore the policy provisions of SPP5.4 would apply.	The need to undertake a noise assessment is well understood and it is likely that most developments would require a noise assessment, building standards (such as double glazing). Therefore, would avoid including specific statements regarding singling out just one measure of SPP5.4 - the need for Notification on titles.
5.6 Design Review Panel	20. Relocate to section 4.2.2 General development requirements.	This statement should be included upfront when discussing the operation of the LSP and or beginning section 4.2.2 general development requirements.

6Additional Information	21. Update table 4.	Review list of additional plans as some not required at subdivision stage (and in some cases even not at development stage) for instance foreshore management plan, fire management plan, local water management strategy (this has not been provided within the LSP), environmental assessment report, landscape plan.
Plan 1: Structure Plan Map	22. (a)Amend structure plan boundary to remove Ascot Racecourse land but include reference to subject to Ascot Racecourse PSP. (b) Allocate R Coding (R-AC3) for the Ascot Kilns site and remove reference to separate planning process for the site. (C)Include area of POS at southern end of Ascot Kilns providing a link to Belmont Trust Land and proposed POS at end of Daly street. * Note the WAPC would support the consolidation of this LSP and Ascot PSP as a one PSP for the whole area.	Ascot Racecourse land is subject to separate PSP which as a minimum should be referenced appropriately within the structure plan and Plan needs to be amended to factor no need for an LDP for Ascot Kilns site.
Plan 2: Precinct Plan	23. (a) Amend as per 22 (a and b) above in relation to references to Ascot Racecourse PSP and Ascot Kilns. (b) Amend the number and alignment of precinct boundaries as needed after taking into consideration precinct objectives.	Plan needs to be amended to factor the Ascot PSP and that there is no longer the need for an LDP. The number and configuration of precinct boundaries needs consideration as there is little to distinguish precincts 2, 3 and 4.
Plan 3: Building height plan	24. (a) Amend as per 22 (a and b above in relation to references to Ascot Racecourse PSP and Ascot Kilns and remove references to minimum heights. (b) Amend to reflect change made to section Table 2 (c) Remove references to podium requirements for 3 storeys and more.	Including minimum heights on the Plan does not accurately reflect the vision and intent of the structure plan in terms of max heights and assumes that the current lot configuration dictates the difference of 10-15 storeys and doesn't factor the need for suitable transitioning of heights.
Part 2	25. Amend all of Part 2 and relevant technical reports (and include local Water Management Strategy) to factor changes made within Part 1 and to ensure it is up to date with current structure plan and not previous versions.	Content within Part 2 that is covered within Part 1 needs to be removed and or amended to reflect the modifications recommended for Part 1.