Attachments



## Ordinary Council Meeting 23/03/21

### Item 12.1 refers

# Attachment 4

### Schedule of Submissions



#### SCHEDULE OF SUBMISSIONS DRAFT REDCLIFFE STATION ACTIVITY CENTRE PLAN (Adopted for Pre-Consultation 10 December 2019)

#### Landowners / Occupiers

No.	Submitter	Summary of Submission	Officer Comment
1.	L Adams 135 Coolgardie Ave, Redcliffe	1.1 Supports the draft activity centre plan and the redevelopment of the area.	Noted.
		1.2 Acknowledges that land amalgamation is necessary to create land sizes sufficient for the size of development envisioned by the draft activity centre plan.	Noted.
		1.3 Concerned that the minimum development requirement of 1,600m <sup>2</sup> will require most lots within the area to amalgamate.	Refer to discussion under the heading Minimum Lot Size and Frontage Requirements in the Officer Comment section of the report.
		1.4 Questions how the land amalgamation requirement will be administered such that no one lot is left unable to develop.	Refer to response to comment 1.3 above and discussion under the heading Special Control Area in the Officer Comment section of the report.
		1.5 Indicates a preference for a third-party to facilitate land amalgamation in the area (i.e. the State Government).	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		1.6 Suggests that consideration be given to managing landowners who are resistant to selling or amalgamating so that redevelopment is not stalled.	It is considered inappropriate to force landowners to develop or compulsorily acquire land to facilitate other landowners developing.
2.	P Cigula 65 Kanowna Ave East, Redcliffe 117 Second Street, Redcliffe	2.1 Suggests that the School Interface Precinct be exempt from the minimum site development area of 1,600m <sup>2</sup> so that landowners can develop based on the existing lot sizes.	Refer to discussion under the heading Minimum Lot Size and Frontage Requirements in the Officer Comment section of the report.
		2.2 Considers that the development contribution for the School Interface Precinct should be reduced commensurate to the location of the new Redcliffe Train Station and the low coding applied to this precinct.	The proposed Development Contribution Plan cost apportionment methodology is premised on a 'scaled' contribution rate that is proportionate to the development potential in each sub-precinct. Refer to discussion under the heading Cost Apportionment Methodology in the Officer Comment section of the report.

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		2.3 Considers that the involvement/input of residents in the drafting of the document and decision making is essential given its implications on future development options/outcomes and that a collaborative approach should be adopted with the community to achieve the best possible outcome for the area.	ACP is to seek feedback from the community before progressing
		2.4 Considers that the involvement of residents regarding the outcome of decisions made during the drafting process is essential, as this is likely to significantly affect landowner's development options, property outcomes and the time frames associated with these changes. Input considerations regarding zoning, frontages, potential increase in residents and how to achieve and manage this are significant points of concern. These points should be shared and discussed by interested members of the community and an equal opinion decided upon, derived from the input of residents, local government and corroborating bodies involved in the activity centre plan.	Refer to response to comment 2.3 above.
		Considers that their interests are likely to be shared by other landowners and that there would be benefit to share collective input and involved parties to work together to achieve the best possible outcome for this plan to protect landowner interests.	
		2.5 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		(i) The acknowledgement and inclusion of resident DA6 landowners.	

No.	Submitter	Summary of Submission	Officer Comment
		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
		(iii) The requirement for two of the four regular community engagement activities conducted by the City to be in the form of consultative workshops with the 12 community representatives that:	
		<ul> <li>a) Reviews any land assembly recommendations and processes and evaluates options that may be available for a group or groups of DA6 resident landowners to offer a parcel or parcels of properties to market should these landowners be interested in doing so. That in this process residential community landowners are given equal status and consideration by the City, any other state government agency, and Perth Airport to that given to commercial investors and redeveloping landowners in DA6.</li> </ul>	
		b) Includes industry representatives i.e. town planners (in addition to City Officers), developers, builders, commercial realtors and a solicitor independent from the City.	

No.	Submitter	Summary of Submission	Officer Comment
		(iv) That the City identifies the location of infrastructure/construction works and provide three months' notice to DA6 residents before intends for such works to commence togethe with project timelines, and what mitigation strategies the City will require be implemented the ensure OHS compliance and how these strategies will protect local resident amenit during the period of works, to the satisfaction of DA6 resident.	s t r n o e
3.	B Deuchar 1 Yabaroo Place, Ascot	3.1 Considers that the location of the new Redcliffe Trai Station was conceived on the basis that the Pert Airport's Terminals 3 and 4 would be passenger facilitie in the foreseeable future, despite the Perth Airpon Masterplan projecting that all operations would b relocated to a consolidated precinct at Terminals 1 and 2 and therefore questions its purpose in serving the airport.	the chosen location of the Redcliffe Train Station.
		3.2 Notes that the likely users of the new Redcliffe Train Station will be existing residents (including residents in Ascot), tourists using the hotel complexes along Great Eastern Highway, people working within Perth Airport estate, Ascot racecourse patrons and future residents of the proposed activity centre.	n t t
		3.3 Considers that bus passenger numbers in the area are low so notes that the activity centre will need to have a reasonably high-density population.	
		3.4 Notes that most land within the precinct is predominantl residential, with some commercial and accommodatio uses along Great Eastern Highway and vacant land.	
		3.5 Considers that the new commercial developments within Perth Airport Estate (i.e. DFO and Costco) may attract passengers to Redcliffe Train Station, however question its attractiveness due to its distance and that the bulk nature of the goods sold would favour car usage.	t walkable catchment of the Redcliffe Train Station. The Costco development is however outside the walkable catchment, however

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		3.6 Questions the future availability and adequacy of public open space in the precinct.	Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
		3.7 Considers that Redcliffe Primary School oval is not currently utilized to any extent but should be preserved at all costs.	
		3.8 Does not support Redcliffe Primary School becoming a 'community space' and considers that school children should have a dedicated sports area for their health and educational purposes and it should therefore form part of the school. Acknowledges that the school oval is often used during school holidays by local children as a play area so it already functions as a 'multi-user' area, but is respected as forming part of the school.	The proposal for a shared use agreement with the Department of Education to allow for the use of the Redcliffe Primary School oval by the wider community was not intended to occur at the expense of usage by the school. The land is owned by the Department of Education who would ultimately control how the land is used. A shared use agreement would simply allow for any shared facilities, for example sporting clubrooms, to also be used by community groups. A local government would typically share the cost of providing and maintaining the facilities and space, typically to a higher standard than that of a standard school oval, to the benefit of both the Department of Education and the community. Notwithstanding, the Department of Education have indicated that they would not support a shared use agreement for the oval unless additional land was secured to increase the size of the school site.
		3.9 Questions whether the proposed zoning is such that existing residents can/will sell out to developers.	Refer to discussion under the heading Attractiveness and Viability of Redevelopment in the Officer Comment section of the report.
		3.10 Questions the timing of when redevelopment will occur.	The timing of redevelopment of private land within the precinct is subject to the intentions of individual landowners and market considerations. In terms of public infrastructure improvements, the draft Activity Centre Plan provides indicative timeframes for implementation, however these are subject to change depending on the availability of funds and the City's capital works programme.
		3.11 Considers that access to Garvey Park will play an important role in the early success of the precinct.	Noted.
		3.12 Suggests establishing a minimum public open space requirement based on density.	This approach does not align with the State Government's position on public open space provision.

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		3.13	Considers that the Southern Main Drain may dry up and that a 'living stream' concept is unlikely unless water flows are increased through the drain.	The Southern Main Drain is not predicted to dry up.
4.	P Flait 80 Boulder Ave, Redcliffe	4.1	Supports the draft activity centre plan and the redevelopment of the area.	Noted.
5.	B and M Due 15 The Court, Redcliffe	5.1	Concerned with traffic flows along Second Street and Kanowna Avenue, near Redcliffe Primary School. Notes that traffic flows are already high in these locations, with traffic gridlocking during school pick up and drop off times. Considers that this problem will be exacerbated with higher density development, the new Redcliffe Train Station and the shopping precinct.	Refer to discussion under the heading Traffic Volumes & Road Network Capacity in the Officer Comment section of the report.
		5.2	Considers that there is an opportunity to put in place new traffic management measures before development is undertaken in the area.	The City is exploring opportunities for traffic management measures in the precinct in the short-term, irrespective of the proposed redevelopment of the precinct.
		5.3	Suggests that the proposed reserve adjacent to Tonkin Highway be utilized as a one-way pick-up/drop-off facility for the school to improve traffic flow and safety.	At this stage, no advice has been received from Main Roads WA confirming whether this land is surplus to the requirements of Tonkin Highway or whether it could be used for alternative means. In any event, this suggestion could be discussed further between the City and State Government departments.
6.	S Rawlins 96 & 98 Bulong Ave, Redcliffe	6.1	Supports the proposed R100 density code (applicable to the Residential Core Precinct).	Noted.
7.	B Turner 164 Keymer St, Belmont	7.1	Does not support further development on Perth Airport's land around Redcliffe (Airport West Precinct).	The City does not have any jurisdiction over development within Perth Airport estate, and in any event it is not relevant to the draft ACP.
		7.2	Considers that development on Perth Airport's land is creating excessive traffic along Stanton Road and around local primary schools.	Refer to discussion under the heading Traffic Volumes & Road Network Capacity in the Officer Comment section of the report.

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		7.2	Considers that there is no need for more retail space in the precinct in light of the current economic climate, and rather support should be given to using existing shops.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
8.	L Lewis 145 Bulong Ave, Redcliffe	8.1	Supports the draft activity centre plan and the redevelopment of the area.	Noted.
		8.2	Considers that more clarity is required on the timeline for the project/redevelopment.	The City is aiming to have a planning framework in place for the area by late 2021. This however is subject to the resolution of planning issues and decision making requirements.
				The timing of redevelopment of private land within the precinct is subject to the intentions of individual landowners and market considerations. In terms of public infrastructure improvements, the draft ACP provides indicative timeframes for implementation, however these are subject to change depending on the availability of funds and the City's capital works program. Refer to comments under the heading Timing and Priority of Infrastructure Delivery in the Officer Comment section of the report.
9.	S Lee Yenrise Pty Ltd 162 Keymer St, Belmont	9.1	Considers that the area is well catered for in retail, especially as Costco and the Service Station in Perth Airport Estate have been added to retail space in Belmont.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
		9.2	Considers that the addition of another shopping centre at this stage is too early, and should not be considered until residential development has been undertaken.	Refer to response to comment 9.1 above.
10.	M H Daly Daly SF Pty Ltd 18 Belvidere St, Belmont 164 Keymer St, Belmont	10.1	Considers that the area is well catered for in retail, especially as Costco and the Service Station in Perth Airport Estate have been added to retail space in Belmont.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
		10.2	Considers that the addition of another shopping centre at this stage is too early, and should not be considered until residential development has been undertaken.	Refer to response to comment 10.1 above.

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11.	H W Daly Daly SF Pty Ltd 18 Belvidere St, Belmont	11.1	Considers that the area is well catered for in retail, especially as Costco and the Service Station in Perth Airport Estate have been added to retail space in Belmont.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
		11.2	Considers that the addition of another shopping centre at this stage is too early, and should not be considered until residential development has been undertaken.	Refer to response to comment 11.1 above.
12.	S W Daly Daly SF Pty Ltd 40 Belvidere St, Belmont	12.1	Considers that the area is well catered for in retail, especially as Costco and the Service Station in Perth Airport Estate have been added to retail space in Belmont.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
		12.2	Considers that the addition of another shopping centre at this stage is too early, and should not be considered until residential development has been undertaken in which case the retail need can be assessed.	Refer to response to comment 12.1 above.
13.	Jindabyne Pty Ltd Unit 183/161 Keymer St, Belmont	13.1	Considers that the area is well catered for in retail, especially as Costco and the Service Station in Perth Airport Estate have been added to retail space in Belmont.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
		13.2	Considers that the addition of another shopping centre at this stage is too early, and should not be considered until residential development has been undertaken.	Refer to response to comment 13.1 above.
14.	J W Daly Yenrise Pty Ltd 162 Keymer St, Belmont & 44 Belvidere St, Belmont	14.1	Considers that the area is already well catered for in retail now and in the future.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
15.	D Wilson 49 Gardiner St, Belmont	15.1	Does not support retail development in Perth Airport estate.	The City does not have any jurisdiction over development within Perth Airport estate.
		15.2	Considers that the area is already well catered for and more retail development is not required.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.

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		15.3	Concerned that further retail development will impact existing small businesses and their long term viability.	Refer to response to comment 15.1 above.
		15.4	Considers that development in Perth Airport estate is creating traffic problems in the local area.	Refer to discussion under the heading Movement Network in the Officer Comment section of the report.
16.	K Eichner Henrietta St, Kewdale	16.1	Does not support additional retail development in Perth Airport estate.	The City does not have any jurisdiction over development within Perth Airport estate.
		16.2	Considers that the area is already well catered for and more retail development is not required.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.
		16.3	Concerned that further retail development will impact existing small businesses and their long term viability.	Refer to response to comment 16.1 above.
		16.4	Considers that development in Perth Airport estate is creating traffic problems in the local area.	Refer to discussion under the heading Traffic Volumes & Road Network Capacity in the Officer Comment section of the report.
17.	Z & C Aziz 146 Coolgardie Ave, Redcliffe	17.1	Does not support Road 3 (the connection of Bulong Avenue and Second Street) as it will allow traffic to enter through Coolgardie Avenue to access the train station, potentially causing safety issues.	Refer to discussion under the heading Bulong Avenue and Second Street Connection (Road 3) in the Officer Comment section of the report.
		17.2	Considers that Central Avenue should be the main access point to the new train station as it would cause less of an impact for people living in the area.	The draft ACP proposes to retain the restriction on through movements to Great Eastern Highway and Central Avenue until such time that Qantas relocate operations at Perth Airport and Great Eastern Highway, after which access arrangements to Great Eastern Highway will be reviewed by the City and Main Roads WA. This is on the basis that it could encourage additional through-movements in the precinct for vehicles accessing Perth Airport estate, in lieu of utilizing Fauntleroy Avenue and Tonkin Highway.
18.	E Hethey 51 Boulder Ave, Redcliffe	18.1	Notes that there are several old trees, Eucalyptus rudis and Melaleucas in the open rear to the rear of Seasons Funeral Parlous which is remnant vegetation and valuable for diversity and preserving provenance vegetation.	Noted. The draft ACP has been modified to incorporate this land and associated trees within public open space to facilitate their retention. Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.

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		18.2	Identifies various fauna specifies which have been observed in the area, but have declined since the clearing of airport land for the DFO and Costco developments.	Noted.
		18.3	Considers that the draft activity centre plan should be modified to retain the remnant trees within public open space on the basis of their ecological value to the area.	Refer to response to comment 18.1 above.
		18.4	Acknowledges that with any redevelopment there would be the requirement for developer contributions and is not opposed to the requirement to make a developer contribution.	Noted.
		18.5	Considers that developer contributions should be made towards sustainable green alternatives to the existing infrastructure systems, energy efficient building designs and the reduction of vehicle ownership to reduce pollution.	The application of developer contributions requires upfront knowledge of future infrastructure expenditure, and there must be a demonstratable 'need and nexus' link between the demand for the infrastructure and the development being undertaken. On this basis, it is considered impractical to require developer contributions to be made towards infrastructure that is not demanded by all development within the precinct. For this to occur, a level of guidance needs to be provided through State policy on minimum expectations for sustainable green infrastructure in communities, like that provided for public open space and servicing. Notwithstanding, it is considered that there are other opportunities to implement sustainability initiatives, for example through development incentives and/or offset provisions. This will be explored further through the preparation of the Design Guidelines for the precinct.
19.	P Terry 96 Kanowna Ave East, Redcliffe	19.1	Requests that consideration be given to changing the draft activity centre plan to increase the maximum building height allowance for 96 Kanowna Avenue East (located within Centre Transition Precinct) from 8 storeys to 13 storeys or greater.	Refer to discussion under the heading Sub-Precinct Boundaries in the Officer Comment section of the report.

No.	Submitter		Summary of Submission	Officer Comment
20.	B Mollan 80 Central Ave, Redcliffe	20.1	Considers that the Brearley Avenue road reserve should not be squandered for new development sites and roads, and rather public open space provision should be maximised, particularly in light of increased density, due to its community benefits.	Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
		20.2	Does not support the creation of the development site adjacent to POS 3, and considers that this land should form part of the public open space network.	Refer to response to comment 20.1 above.
		20.3	Considers that the Brearley Avenue road reserve presents an opportunity for the City to develop a green 'core' or 'heart' from the whole of DA6 which could be made into a world class recreation area with increased tree cover, walk and cycle paths, play areas, water areas and vegetation.	The draft Redcliffe Station ACP proposes that significant portions of the former Brearley Avenue road reserve would form a public open space network, central to the precinct. This public open space is expected to facilitate the retention of existing mature trees and be developed to a high standard with passive and active recreational spaces.
		20.4	Considers that the four road connections to Great Eastern Highway should be consolidated into two main road connections, being Boulder Avenue and Coolgardie Avenue.	The draft ACP proposes that the Central Avenue and Bulong Avenue connections to Great Eastern Highway will remain closed to through-traffic until such time that Qantas relocates from Terminals 3 and 4 at Perth Airport and/or Great Eastern Highway is upgraded, in which case traffic modelling would need to be undertaken to demonstrate that the connections will not increase through-movements in the precinct for vehicles accessing Perth Airport estate. In the absence of these through connections, Boulder Avenue and Coolgardie Avenue will serve as the key road connections to Great Eastern Highway for the precinct.
		20.5	Considers that Boulder Avenue should connect between Great Eastern Highway and Second Street, and where it traverses through POS 2, be designed as an attractive chicane type link that provides traffic calming and is sympathetic to the surrounding public open space.	<ul> <li>This is not supported for the following reasons:</li> <li>1. The proposed diversion of Boulder Avenue to Kanowna Avenue would discourage through-movements in the precinct.</li> </ul>
				<ol> <li>The provision of a road through POS 2 would dissect the area and detract from the use of the space for recreational purposes.</li> </ol>

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		20.6	Considers that the existing cul-de-sacs in both Central Avenue and Bulong Avenue remain beyond the relocation of Qantas from Terminals 3 and 4 and Great Eastern Highway upgrade. This would enhance the liveability of developments there, deliberately creating more pedestrian/child friendly areas with less traffic flow.	Refer to response to comment 20.4 above.
		20.7	Recommends that the proposed signalized intersection control at Second Street and Central Avenue be replaced by a roundabout.	Refer to discussion under the heading Second Street and Central Avenue Intersection in the Officer Comment section of the report.
		20.8	Suggests that as part of long-term upgrades to Great Eastern Highway, consideration be given to changing the signalised intersection of Great Eastern Highway and Coolgardie Avenue to a large roundabout to facilitate traffic flow along Great Eastern Highway and access/egress from DA6.	The City does not have jurisdiction over planning for Great Eastern Highway as it is under the care and control of Main Roads WA. Notwithstanding, in providing feedback to Main Roads WA in the future planning of upgrades to Great Eastern Highway, the City recognizes the need for adequate access and egress to be provided between the precinct and Great Eastern Highway.
		20.9	Considers that the planning focus has been on developing the greatest density possible, without due regard to the quality of life of the occupants. Focus should also be given to optimising connections to the station, and the better quality of life this could bring.	In formulating the draft ACP, consideration was given to ensuring that sufficient population is delivered to maintain the viability of convenience retailing and the operation of Redcliffe Train Station, the absence of which would prove to be detrimental to the community. The draft ACP is also proposing significant public realm upgrades in the area, including the delivery of a high quality, central public open space area and upgrades to the local street network to encourage walking and cycling.
21.	D & M Somers 136 Coolgardie Ave Redcliffe	21.1	Questions whether Henderson Avenue will be connected to Dunreath Drive.	The draft Activity Centre Plan does not propose to connect Henderson Avenue to Dunreath Drive.
		21.2	Questions the timeframes surrounding the rezoning of the precinct.	The City is aiming to have a planning framework in place for the area by late 2021. This however is subject to the resolution of planning issues and decision making requirements.
		21.3	Considers that Stanton Road was not built for the amount of traffic it currently accommodates and is concerned that the redevelopment of the area and the opening of the train station will worsen the situation.	Refer to discussion under the heading Traffic Volumes & Road Network Capacity in the Officer Comment section of the report.

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		21.4 Questions the City's strategy for managing existing and future traffic volumes on Stanton Road.	Refer to response to comment 21.3 above.
22.	A Tarawne & N Attfeh 114 Coolgardie Ave, Redcliffe	22.1 Supports the draft activity centre plan and the redevelopment of the area.	Noted.
		22.2 Highlights intention to develop their property.	Noted.
		22.3 Would have preferred a Mixed Use zoning in Coolgardie Avenue.	Providing additional areas to accommodate mixed use development, such as along Coolgardie Avenue, would likely erode the residential nature of the area and detract from the ability to achieve active uses immediately surrounding the train station. Furthermore, dispersing commercial land uses away from the train station precinct would not align with contemporary planning practice for transit-oriented development as it would likely favor car usage.
		22.4 Considers that some of project figures are conservative and expects that they would be greater than what is anticipated.	The anticipated population and dwelling yields are estimated based on a moderate growth scenario however it is possible that these yields could be greater or lesser than expected and occur over a shorter or longer timeframe, depending on market conditions and landowner intentions.
23.	R & J Churchill 99 Bulong Ave, Redcliffe	23.1 Does not support the plan to allow a maximum building height of six storeys on their street (Bulong Avenue located in Residential Core Precinct).	Refer to discussion under the heading Building Height in the Officer Comment section of the report.
		23.2 Considers that the block sizes are too narrow for the scale of development proposed resulting in overshadowing problems.	Refer to discussion under the heading Minimum Lot Size and Frontage Requirements in the Officer Comment section of the report.
		23.3 Considers that there will be problems with parking on the street. This is problematic for Bulong Avenue which has a narrower road pavement width.	Refer to discussion under the heading Car and Bicycle Parking in the Officer Comment section of the report.

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		23.4	Concerned that the removal of the cul-de-sac on Bulong Avenue to allow connection to Great Eastern Highway will create issues with rat-running in precinct.	The draft ACP proposes that the Central Avenue and Bulong Avenue connections to Great Eastern Highway will remain closed to through-traffic until such time that Qantas relocates from Terminals 3 and 4 at Perth Airport and/or Great Eastern Highway is upgraded, in which case traffic modelling would need to be undertaken to demonstrate that the connections will not increase through movements in the precinct for vehicles access Perth Airport estate.
		23.5	Considers that utilities/services cannot support increased development.	The draft ACP has been informed by a Servicing Report which outlines the requirement for infrastructure upgrades in the precinct, which are proposed to be funded through the Development Contribution Plan.
		23.6	Considers that POS 5 is not workable as it would require a large amount of works to make it a walking area and unsafe due to its position next to Tonkin Highway.	Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
24.	M & T Nagy 122 Bulong Avenue, Redcliffe	24.2	Supports the draft activity centre plan and the redevelopment of the area.	Noted.
		24.2	Requests that their property (No. 122 Bulong Avenue) be zoned Mixed Use with an R-AC0 coding on the basis that:	Refer to discussion under the heading Sub-Precinct Boundaries in the Officer Comment section of the report.
			(i) The existing open space at the rear of the property, fronting Central Avenue, is proposed to be zoned Mixed Use with an R-AC0 coding, resulting in a loss of open space and the creation of development up to 13 storeys overlooking overlooking development on No. 122 Bulong Avenue at 8 storeys.	
			(ii) There does not appear to be any logic in not extending the Mixed Use zone across Bulong Avenue to include both No. 122 and 124 Bulong Avenue to 'round off' the Mixed Use zone.	

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		t C	Notes that there is a similar zoning anomaly on Coolgardie Avenue where two lots are wedged between the Mixed Use zone (13 storeys) and the Residential zone (6 storeys) without any logical reasons.	Refer to response to comment 24.2 above.
25.	S Barnsley 112 Coolgardie Avenue, Redcliffe	f	Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		(	<ul> <li>The acknowledgement and inclusion of resident DA6 landowners.</li> </ul>	
		(	(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
		(	(iii) The requirement for two of the four regular community engagement activities conducted by the City to be in the form of consultative workshops with the 12 community representatives that:	
			<ul> <li>a) Reviews any land assembly recommendations and processes and evaluates options that may be available for a group or groups of DA6 resident landowners to offer a parcel or parcels of properties to market should these landowners be interested in doing so. That in this process residential community landowners are given equal status and consideration by the City, any other state government agency, and Perth Airport to that given to commercial investors and redeveloping landowners in DA6.</li> </ul>	

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		<ul> <li>b) Includes industry representatives i.e. town planners (in addition to City Officers), developers, builders, commercial realtors and a solicitor independent from the City.</li> </ul>	
		(iv) That the City identifies the location of infrastructure/construction works and provides three months' notice to DA6 residents before it intends for such works to commence together with project timelines, and what mitigation strategies the City will require be implemented to ensure OHS compliance and how these strategies will protect local resident amenity during the period of works, to the satisfaction of DA6 resident.	
26.	J Francis-Hayes 3/5 The Court, Redcliffe	26.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		<ul> <li>(i) The acknowledgement and inclusion of resident DA6 landowners.</li> </ul>	
		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
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		(iv) That the City identifies the location of infrastructure/construction works and provides three months' notice to DA6 residents before it intends for such works to commence together with project timelines, and what mitigation strategies the City will require be implemented to ensure OHS compliance and how these strategies will protect local resident amenity during the period of works, to the satisfaction of DA6 resident.	
27.	D Everett 166 Coolgardie Ave, Redcliffe	27.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		(i) The acknowledgement and inclusion of resident DA6 landowners.	

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		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
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28.	l Brzusek 3 Henderson Ave, Redcliffe	28.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		<ul><li>(i) The acknowledgement and inclusion of resident DA6 landowners.</li></ul>	
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29.	S McLaren 91 Boulder Ave, Redcliffe	29.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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30.	B Robinson & S Newman 95 Boulder Ave, Redcliffe	30.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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31.	J Hustwitt 116 Central Ave, Redcliffe	31.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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32.	K & D Sullivan 122 Central Ave, Redcliffe	32.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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33.	B Scharfenstein 140 Coolgardie Ave, Redcliffe	33.1 Notes that the rail tunnel alignment may limit the ability for multi-storey commercial and residential development to be undertaken in the locations identified by the draft activity centre plan.	The rail tunnel will be subject to a Public Transport Authority Protection Zone that will pose limitations on certain works that can be undertaken within the zone. Notwithstanding, multi-storey development can still be undertaken within the zone subject to a loading and excavation assessment being undertaken.

No.	Submitter		Summary of Submission	Officer Comment
		comme	sts that consideration be given to locating rcial and high-rise residential in locations where re fewer impediments.	The rationale for locating more intensive development immediately surrounding the train station and fronting Great Eastern Highway is supported by contemporary planning practice for transit-oriented development. More specifically, it is desirable to locate land uses that generate activity and promote the use transit facilities through immediate accessibility. The limitations posed by the rail tunnel are not expected to undermine the ability to intensive development and active uses.
			sts that Coolgardie Avenue offers the most rational tive as the commercial corridor of DA6 on the nat:	Providing additional areas to accommodate mixed use development, such as along Coolgardie Avenue, would likely erode the residential nature of the area and detract from the ability to achieve active uses immediately surrounding the train station. Furthermore, dispersing commercial land uses away from the train station precinct would not allow the development of a combined Neighbourhood Centre with Perth Airport, nor would it align with contemporary planning practice for transit-oriented development as it would likely favor car usage.
		(i)	Coolgardie Avenue is a direct vehicle and pedestrian access route from the train station to Great Eastern Highway	It is acknowledged that Coolgardie Avenue has good accessibility to/from Great Eastern Highway.
		(ii)	Coolgardie Avenue is one of the wider roads in DA6 and has the capacity for a 30 metre wide road reserve.	It is acknowledged that Coolgardie Avenue has a wide road reservation.
		(iii)	Concentrating commercial generated traffic in one area will reduce commercial traffic moving through the area.	Mixed use development immediately surrounding the train station is not intended to attract vehicle traffic, and rather it is intended to serve the local population in accordance with the principles of transit-oriented development.
		(iv)	Coolgardie Avenue can be opened onto Dunreath Drive, or provide an additional access to the train station by extending Henderson Street.	The proposition of opening Coolgardie Avenue to Dunreath Drive was strongly opposed by the local community in formulating the Vision Plan for the precinct. This was on the basis that it could carry through-traffic between Perth Airport estate and Great Eastern Highway and undermine the residential amenity of the area.

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		(v)	Coolgardie Avenue has an upgraded traffic light controlled intersection. Main Roads WA are not supportive of traffic flowing out of Bulong Avenue or Central Avenue and are opposed to traffic lights being installed at Great Eastern Highway and Central Avenue.	Refer to response to comment 33.3(i) above. Nonetheless, the desire for mixed use development immediately surrounding the train station is driven by contemporary planning practice rather than maximizing accessibility for traffic which would undermine the principles of transit oriented development.
		(vi)	Coolgardie Avenue is a long way from the rail tunnels.	Refer to responses to comments 33.1 and 33.2 above.
		(vii)	Coolgardie Avenue residents are amendable to selling en-bloc which provides opportunity for a large amalgamated land parcel to kick off the commercial redevelopment the area needs to generate developer contributions.	The ability to package and sell multiple land parcels has no bearing on whether land along Coolgardie Avenue would be suitable for commercial development as the land could equally be developed for residential purposes.
		(viii)	Coolgardie Avenue lots and adjoining Bulong Avenue lots can be amalgamated to allow greater scope for commercial redevelopment.	Refer to response to comment 33.3(vii) above.
		(iv)	Rather than having high-rise centrally located and heights reducing to the perimeters of DA6, this should be reversed: high rise at the perimeter – Coolgardie Avenue and The Court precinct, reducing to low rise in the centre. Lower rise apartments overlooking the Brearley Parkland would be a more-attractive housing proposition.	Refer to response to comment 33.2 above.
		(v)	With commercial redevelopment concentrated in the Coolgardie-Bulong Avenue street block, all the pocket parks can be retained with low rise, high value apartments built around them.	There is no relationship between locating mixed use development (including commercial uses) and the creation of development sites through the rationalization of former Brearley Avenue road reserve and existing reserves.

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		(v)	Retain the Southern Main Drain in its current linear form. This acts as a natural setback from the tunnels and offers an attractive water feature with less extravagant rejuvenation required than that currently proposed.	The Southern Main Drain is currently located within the rail tunnel's protection zone, and would continue to be based on the current concepts for the realignment of the drain. It is considered that retaining the Southern Main Drain is its current linear form would not offer an attractive water feature compared to an upgraded meandering drain that is integrated with the landscape design of public open space.
		future	ders that the draft activity centre plan and any DA6 redevelopment documentation include a nance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		(i)	The acknowledgement and inclusion of resident DA6 landowners.	
		(ii)	That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
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34.	M Brzusek 144 Coolgardie Ave, Redcliffe	34.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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35.	G Homsany 128 Coolgardie Ave, Redcliffe	35.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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36.	J Homsany 128 Coolgardie Ave, Redcliffe	36.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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37.	F Shehabi 161 Coolgardie Ave, Redcliffe	37.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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38.	S Holt 24 The Boardwalk, Ascot Waters	38.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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39.	T & B Whiting 138 Coolgardie Ave, Redcliffe	39.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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40.	B & S Robinson 2/100 Boulder Ave, Redcliffe	40.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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41.	B Webster 121 Second St, Redcliffe	41.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
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42.	Element on behalf of Perron Group Belmont Forum Shopping Centre	42.1 Notes that the draft activity centre plan is generally consistent with the intent of the applicable planning framework, however the scale of retail floorspace able to be considered (predominantly within the 'Centre Sub-Precinct') is currently unclear, particularly in the absence of a supporting retail needs assessment (RNA) and in light of a 'Neighbourhood Centre' being identified on the airport land within close proximity to the 'Centre Sub-Precinct'.	Refer to discussion under the heading Proposed Activity Centre and Retail Floorspace in the Officer Comment section of the report.

No.	Submitter	Sun	imary of Submission	Officer Comment
		of the prepara Planning Strate respect to antio location. Consid prior to (or at le	RNA is being prepared by the City as part tion of a new city-wide Activity Centres egy and will provide additional detail with cipated and viable retail floorspace in this ders that this should be formally advertised east concurrently with) formal consultation tivity centre plan to ensure consistency o documents.	Refer to the response to comment 42.1 above.
		likely that a development v Precinct'. Such	at this stage of the planning process, it is limited amount of finer grain retail vill be appropriate for the 'Centre Sub- an arrangement would be consistent with f a station precinct as envisaged by Perth million.	Refer to the response to comment 42.1 above.
		plan seems to retail uses by ownership. Red the activity ce against large fo supermarkets) established reta	language within the draft activity centre predicate against large format or scale ased on pre-existing fragmented land quests that the final advertised version of ntre plan clearly states a presumption rmat retail development (i.e. large full line that would potentially undermine the ail hierarchy that exists within the City and n proven to meet the needs of the	Any retail proposal will be considered against the Retail Needs Assessment, and if necessary, the preparation of a Retail Sustainability Assessment. It is considered inappropriate for the draft ACP to limit the nature and scale of retail development if it can be demonstrated that it is consistent with its role and function as a Neighbourhood Centre and does not undermine the retail sustainability of other activity centres within the hierarchy.
		provide a brea floorspace' i 'Shop/Retail' flu ACP. Request completion of	Activity Centre Summary Table does not kdown of the anticipated 'non-residential nto anticipated 'Commercial' and porspace as is generally seen within an s that this be included following the the RNA, when the anticipated retail ne ACP area is known.	Part 2 of the draft ACP includes an explanation of how the anticipated non-residential floorspace figure has been derived and has been updated to include findings of the Retail Needs Assessment. In essence, it is difficult to project the amount of commercial floorspace within the precinct until such time that more certainty exists around Perth Airport's development intentions.

No.	Submitter		Summary of Submission	Officer Comment
		42.6	Notes that under Part 2 of the ACP, the non-residential floorspace estimates for the precinct are outlined in Table 22. This employment floorspace appears to be refined from the initial 4.35ha of non-residential floorspace summarized at the outset of the ACP for the ACP area. Requests that following the preparation of the Activity Centres Planning Strategy, Table 22 be amended to provide a further breakdown of anticipated employment generating land uses and be discussed in greater detail in terms of how this estimated floor area has been calculated (based on the ACP summary data).	Refer to response to comment 42.5 above.
		42.7	Supports the restriction of the 'Shop' land use for the Mixed Use zone along Great Eastern Highway.	Noted.
43.	A & D York 116 Bulong Ave, Redcliffe	43.1	Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
			(i) The acknowledgement and inclusion of resident DA6 landowners.	
			(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
			(iii) The requirement for two of the four regular community engagement activities conducted by the City to be in the form of consultative workshops with the 12 community representatives that:	

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		<ul> <li>a) Reviews any land assembly recommendations and processes and evaluates options that may be available for a group or groups of DA6 resident landowners to offer a parcel or parcels of properties to market should these landowners be interested in doing so. That in this process residential community landowners are given equal status and consideration by the City, any other state government agency, and Perth Airport to that given to commercial investors and redeveloping landowners in DA6.</li> </ul>	
		<ul> <li>b) Includes industry representatives i.e. town planners (in addition to City Officers), developers, builders, commercial realtors and a solicitor independent from the City.</li> </ul>	
		(iv) That the City identifies the location of infrastructure/construction works and provides three months' notice to DA6 residents before it intends for such works to commence together with project timelines, and what mitigation strategies the City will require be implemented to ensure OHS compliance and how these strategies will protect local resident amenity during the period of works.	
44.	M Szczepaniak 61 Kanowna Ave East, Redcliffe	44.1 Suggests that consideration be given to the inclusion of certain exemptions to the Minimum Development Site Area requirements to allow the development of an individual lot where all other key controls, including Minimum Development Site Frontage, can be met, and an applicant can demonstrate that the proposal otherwise aligns with the precinct objectives.	It is considered unlikely that there would be instances where it would be appropriate to vary the minimum development site area requirements. Notwithstanding, in considering any application for development approval, irrespective of the location, discretion to consider variations to development standards exists.

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		44.2	Notes that Table 24 – Key Issues of the draft activity centre plan acknowledges that it will be challenging for developers to acquire sufficient land to facilitate redevelopment in accordance with the vision, and $4.2.1 - L$ and Assembly provides the rationale for the minimum site area as being the fact that the most common land parcel size throughout the precinct has a narrow frontage (15m) and significant depth (50m+).	Refer to response to comment 44.1 above.
		44.3	Considers that in situations where a frontage exceeding 50m exists, such as corner lots, providing an exemption to the Minimum Development Site Area will facilitate redevelopment in accordance with the vision. Considers that without such an exemption, the activity centre plan will impede rather than facilitate development on corner lots – where there is only one adjacent lot with which amalgamation would be possible.	Refer to response to comment 44.1 above.
		44.4	Provides example of property No. 61 Kanowna Avenue East which has a frontage to First Street of 58m, which is in excess of the 30m Minimum Development Site Frontage required for the School Interface Precinct.	Refer to response to comment 44.1 above.
		44.5	Suggests that the draft activity centre plan would significantly reduce the extent to which corner blocks can be developed (without amalgamation), noting that an R30 density bonus for R20 coded corner lots has been in place in the City of Belmont since the early 1990s (Local Planning Scheme No. 15 clause 5.3.2(2)).	Refer to response to comment 44.1 above. LPS 15 identifies the DA6 precinct as requiring a structure plan prior to any subdivision or development being undertaken. As such, there is limited ability to employ the corner lot density bonus provisions under LPS 15, which in any event facilitate a substantially lower density than that required by the draft ACP.
45.	A Wilson 167 Coolgardie Ave, Redcliffe	45.1	Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
			(i) The acknowledgement and inclusion of resident DA6 landowners.	

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		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
		(iii) The requirement for two of the four regular community engagement activities conducted by the City to be in the form of consultative workshops with the 12 community representatives that:	
		a) Reviews any land assembly recommendations and processes and evaluates options that may be available for a group or groups of DA6 resident landowners to offer a parcel or parcels of properties to market should these landowners be interested in doing so. That in this process residential community landowners are given equal status and consideration by the City, any other state government agency, and Perth Airport to that given to commercial investors and redeveloping landowners in DA6.	
		b) Includes industry representatives i.e. town planners (in addition to City Officers), developers, builders, commercial realtors and a solicitor independent from the City.	

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		(iv) That the City identifies the location of infrastructure/construction works and provides three months' notice to DA6 residents before it intends for such works to commence together with project timelines, and what mitigation strategies the City will require be implemented to ensure OHS compliance and how these strategies will protect local resident amenity during the period of works.	
46.	R Greenwood 151 & 153 Coolgardie Ave, Redcliffe	46.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		<ul><li>(i) The acknowledgement and inclusion of resident DA6 landowners.</li></ul>	
		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
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47.	J Greenwood 151 & 153 Coolgardie Ave, Redcliffe	47.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	
		<ul><li>(i) The acknowledgement and inclusion of resident DA6 landowners.</li></ul>	

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48.	A & B Davis 98 Boulder Ave, Redcliffe	48.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		<ul><li>(i) The acknowledgement and inclusion of resident DA6 landowners.</li></ul>	
		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
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49.	D Mossenson Zoonie Pty Ltd 401 Great Eastern Hwy, Redcliffe	49.1 Notes that this review takes place at a time of unprecedented challenges to public health and safety, to household incomes, business viability and the fiscal capacity of each level of government to fund emerging and existing priorities.	Noted, however it remains necessary to formulate a plan to guide the future redevelopment of the precinct.

No.	Submitter		Summary of Submission	Officer Comment
		49.2	Notes that the Council and the State Government has both the opportunity and a compelling responsibility to review the priorities, assumptions and goals that blend the existing DA6 proposal, the closure of Brearley Avenue, the Activity Centre Plan and wider connected planning and development proposals.	The draft Redcliffe Station Activity Centre Plan has been prepared in accordance with Council's adopted Vision Plan and Implementation Strategy. Nonetheless, the draft Activity Centre Plan represents 'finer-grain' planning supported by detailed technical analysis. It is therefore not unreasonable to assume that refinements will be made that may differ from the adopted Vision Plan.
		49.3	Notes that they are a substantial ratepayer in each of the wards in the City of Belmont and that they have a long-term investment in and commitment to the City and its people.	Noted.
		49.4	Notes that they have funded independent reviews of most aspects of developments proposed here over the last decade and that their advisors have raised fundamental objections to the planning processes, the assumptions and to proposed outcomes. Considers that the Council and the State Government have either failed or refused to adequately account for and deal with various fundamental issues.	All previous submissions that have been provided were carefully considered by the City.
		49.5	Considers that a Heritage Review should be undertaken for the precinct and that a plan should be in place to protect or honour heritage values. Notes that the trees lining Brearley Avenue were the last impression for departing travelers and new arrivals into Perth and considers that they provide a unique planning and amenity benefit to local people. Notes that no plan is in place to honour the memory of pioneer aviator Norman Brearley.	The retention of the mature trees within the Brearley Avenue road reserve is identified as a key action in the draft Redcliffe Station Activity Centre Plan. Given that the retention of the trees is a high priority, it is considered that there is little to no benefit for their inclusion on the City's Heritage List. Nonetheless, the City will be undertaking a review of its Heritage List and Municipal Heritage Inventory in the near future and can consider the heritage value of the trees through that review process.
		49.6	Considers that there is a safety risk in the area due to limited road access and egress options and fire safety. Considers that there is a risk to residents, schools and businesses due to shrinking road infrastructure having to serve a massive lift in traffic stimulated by multiple retail, manufacturing and logistics operations now operating or proposed to operate in Perth Airport estate.	There is no evidence to suggest that the road network in the precinct poses a safety risk.

No. Submitter	Summary of Submission	Officer Comment
	49.7 Considers that the prospect of a large-scale removal of the Brearley Avenue mature trees is a major environmental issue. Concerned about impacts such as loss of bird habitat, plant diversity, commitment to greenhouse targets and ambient ground temperatures. States that Council shares a commitment with other local government jurisdictions to increase the tree canopy in the City and that significant monetary value has been placed on these assets, however Council plans to remove them.	

No.	Submitter	Summary of Submission	Officer Comment
		49.8 Suggests that none of the DA6 proposals have en accompanied by a coherent and comprehensive to plan. Considers that such a plan must clearly credible costings, reliable funding sources and described long term economic benefits. Conside the biggest risks evident today are that p development is unaffordable in the current e climate and that there will be environmental, so financial costs up front, with no clear timeline benefits that have yet to be fully defined or articular sources and the second	support the redevelopment of the precinct. The proposition of medium and high density residential and mixed use development surrounding the Redcliffe Train Station is supported by contemporary planning principles and encouraged by the State Government's Perth and Peel @ 3.5 million strategic planning framework. More specifically, there is a directive from the State Government to plan areas in such a way that would promote a more energy efficient and consolidated urban form; reduce the

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		49.9	Notes that even with an ideal plan there will be winners and losers amongst residents, landowners and business operators. Considers that Council and the State Government cannot expect those experiencing negative impacts to accept the situation and that there must be up front commitments to mitigation, remediation and ultimately compensation for those experiencing material loss or reduced amenity in the enjoyment of their property rights.	The City cannot comment or speculate on individual grievances, but nonetheless will consider any concerns on their merits and will endeavor to assist, where appropriate. Given that the planning for the redevelopment of DA6 has occurred over a long period of time, it would not be unreasonable to expect the area to change over time as development occurs, and would not warrant compensation.
		49.10	Acknowledges that the draft activity centre plan provides detailed guidance for future redevelopment of the precinct and No. 401 Great Eastern Highway. Notes that the draft activity centre plan proposes a maximum 8-storey building height, with up to 13-storeys subject to satisfying bonus criteria (community benefit). Notes that a maximum plot ratio of 3.0 is also applicable (up to 4.0 with bonus criteria). Indicates support of these provisions.	Noted.
		49.11	States that the closure of Brearley Avenue at Great Eastern Highway was not specifically required for the construction of the new train station, and instead it was a decision aimed purely at improving traffic flows along Great Eastern Highway, with no consideration for the impacts on accessibility to and from the adjacent local area.	Main Roads WA's decision to close Brearley Avenue was made to improve safety and the overall efficiency of traffic movements on Great Eastern Highway. In doing so, upgrades were made to the Fauntleroy Avenue, Coolgardie Avenue and Boulder Avenue intersections with Great Eastern Highway to maintain accessibility to the local area.
		49.12	Considers that the closure of Brearley Avenue has significantly impacted access for the western portion of the precinct, including No. 401 Great Eastern Highway. Notes that the only option for egress from the precinct to Great Eastern Highway is via Boulder Avenue (left-turn only) and Coolgardie Avenue (full movement), with ingress being limited to only Coolgardie Avenue.	Whilst Brearley Avenue provided full movement access to Great Eastern Highway, all properties within the precinct are afforded alternative access via Boulder Avenue (left-in/left-out) and Coolgardie Avenue (full movement).
		49.13	Considers that the closure of Brearley Avenue will ultimately reduce the capacity of potential development within the precinct, and increases overall traffic flows on Boulder Avenue.	There is no evidence to suggest that the closure of Brearley Avenue will reduce the capacity of development within the precinct. It is also not unreasonable to expect an increase in traffic on local roads as redevelopment occurs over time.

No.	Submitter		Summary of Submission	Officer Comment
		49.14	Requests that the City, in consultation with Main Roads WA, investigates improved access arrangements to Great Eastern Highway. Suggests the following:	
			(i) Extending Kanowna Avenue to intersect with Great Eastern Highway (in the former location of the Brearley Avenue intersection). Considers that this will provide optimal local access that avoids funneling traffic between surrounding residential streets and the Coolgardie Avenue intersection, and provides an opportunity to explore any construction constraints posed by the rail tunnel.	Main Roads WA did not support the retention of access to Great Eastern Highway at its intersection with Brearley Avenue. The re- introduction of an intersection in this location would undermine the reasons for the Brearley Avenue and Great Eastern Highway intersection closure.
			(ii) Provide a right-turn entry from Great Eastern Highway into Boulder Avenue to provide a secondary right-turn access point in to the precinct that is adequately spaced from the Coolgardie Avenue intersection.	Due to the proximity of the intersection to the Great Eastern Highway/Tonkin Highway interchange and the future upgrades proposed to Great Eastern Highway, these issues require consideration by Main Roads WA in undertaking their future road planning design work. In the absence of that work having been finalised by Main Roads WA, it is not practical to pre-determine future access arrangements to Great Eastern Highway.
		49.15	Considers that the street form and management strategies proposed by the draft activity centre plan, including reductions in traffic speeds, traffic calming devices and intersection controls can minimize rat running through the suburb.	Noted.
		49.16	Requests that the current connection of Boulder Avenue and First Street via the 'temporary' Brearley Avenue is retained, instead of installing a new road connection between a shortened Boulder Avenue and Kanowna Avenue (Road 1). Suggests that this space can be redesigned as a low volume pedestrian friendly environment to complement the future use of the surrounding space as public open space.	Avenue would discourage through-movements in the precinct.

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		49.17 Requests that No. 401 Great Eastern Highway be excluded from the requirement for a public access easement along the rear of the property to facilitate cross access. Whilst this property comprises three separate lots, the submitter considers that this requirement is unnecessary given that the site is within single ownership and would result in the loss of developable land. Alternatively, it is requested that the requirement for this easement is provided on the adjacent rear lot, Crown Reserve No. 27446, and made available for use by No. 401 Great Eastern Highway.	properties as it ensures that cross access can be maintained in perpetuity, irrespective of whether a property is on-sold or redeveloped. No. 401 Great Eastern Highway comprises three lots, and whilst they are currently maintained in single ownership, they could be individually on-sold and a need would arise to facilitate access to Boulder Avenue. It is acknowledged however that should the lots be amalgamated, consideration could be given
		49.18 Notes that a number of traffic calming devices have been identified along Boulder Avenue, Road 1, Kanowna Avenue and First Street, which potentially include raised platforms, paving treatments, one-way treatments, wombat crossings or speed humps. Supports the implementation of horizontal treatments over vertical treatments along First Street, between Bulong Avenue and Coolgardie Avenue and west of Central Avenue, providing they are designed to accommodate longer vehicles which are used by Seasons Funeral Home. Requests that the City explore road treatment/markings to provide for the safe exit of vehicles from Seasons Funeral Home given the likely increase in traffic to be experienced and to prevent vehicle queuing at the exit of the property.	requires further detailed planning which will occur at a later date. The City understands that Main Roads WA have approved line marking to be installed on Boulder Avenue, adjacent to Seasons Funeral Home, to prevent vehicle queuing blocking access points to the site.

No.	Submitter		Summary of Submission	Officer Comment
			Concerned that the redevelopment of the precinct will significantly reduce the availability of on-street parking along Boulder Avenue and exacerbate parking issues. Notes that Seasons Funeral Home currently experiences significant on-street parking issues along Boulder Avenue, and prior to the closure of Brearley Avenue, on- street parking for up to 18 vehicles was possible on the verge since traffic flows were minimal. Also, overflow parking also occurred for approximately 17 vehicles within the adjacent public open space reserve. Requests that a formalised interim off-street parking arrangement be provided to the south No. 401 Great Eastern Highway in the adjacent public open space reserve, until such time that the site is redeveloped.	It is the responsibility of landowners/occupiers to ensure that adequate parking is provided and appropriately managed on-site in accordance with the requirements of a development approval. Notwithstanding, it is recognized that overflow parking can occur with any premises, in which case it should occur in a manner that complies with relevant traffic laws. More specifically, parking is generally permitted on the street, subject to compliance with the City's Parking and Parking Facilities Local Law 2002 however, it is not permitted to occur within any public open space reserve as suggested. It is considered that the availability of on-street parking for overflow purposes should not be assumed as-of-right, and should on-site shortfalls be evident, the landowner/occupier should explore opportunities to provide additional parking and/or adopt appropriate parking management measures.
50.	P Johns 104 – 106 Bulong Avenue, Redcliffe	50.1	Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
			(i) The acknowledgement and inclusion of resident DA6 landowners.	
			(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
			(iii) The requirement for two of the four regular community engagement activities conducted by the City to be in the form of consultative workshops with the 12 community representatives that:	

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		b) Includes industry representatives i.e. town planners (in addition to City Officers), developers, builders, commercial realtors and a solicitor independent from the City.	
		(iv) That the City identifies the location of infrastructure/construction works and provides three months' notice to DA6 residents before it intends for such works to commence together with project timelines, and what mitigation strategies the City will require be implemented to ensure OHS compliance and how these strategies will protect local resident amenity during the period of works.	
51.	P & I Kruh 76 Boulder Avenue, Redcliffe	51.1 Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	
		<ul><li>(i) The acknowledgement and inclusion of resident DA6 landowners.</li></ul>	

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52.	M Elkington 101 Bulong Avenue, Redcliffe	52.1 Considers that the 8.72% public open space proposed in the precinct is insufficient and that 10% should be provided in accordance with the Western Australian Planning Commission's Development Control Policy 2.3 – Public Open Space in Residential Area (DC 2.3).	Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
		52.2 Considers that the increase of public open space provision from what currently exists is not an acceptable reason to provide less public open space than the percentage set by DC 2.3.	Refer to response to comment 52.1 above.
		52.3 Considers that providing less than 10% public open space is unfair to current and future residents and that the City of Belmont should be looking to provide more than 10% at a minimum, and even aiming to provide more than the minimum for its residents.	Refer to response to comment 52.1 above.
		52.4 Does not support the sharing of the Redcliffe Primary School oval as public open space. Considers that it should be reserved for school children at all times and conversely, residents should be able to have access to public open space at all times of the day, and school hours should not limit the access to public open space.	Refer to response to comment 52.1 above.

No.	Submitter		Summary of Submission	Officer Comment
		52.5	Concerned that a number of mature trees within DA6 will be destroyed through re-development, including those trees which are located on private land. Suggests that the City investigates the relocation of mature trees.	The retention of the mature trees within the public realm is identified as a key action in the draft Redcliffe Station Activity Centre Plan. Notwithstanding, the City is unable to require that trees be retained on private property. State Planning Policy 7.3 Residential Design Codes Volume 2 – Apartments does however encourage and offer development concessions for mature tree retention.
		52.6	In relation to proposed maximum building heights, considers that the following is inappropriate for the area:	Refer to discussion under the heading Building Height in the Officer Comment section of the report.
			<ul> <li>A maximum building height of 13 storeys in the mixed use area.</li> </ul>	
			<ul> <li>(ii) A maximum building height of 6 storeys in the 'Residential Core'.</li> </ul>	
			Considers that the maximum building heights need to be re-evaluated and reduced, and questions whether the adopted heights were reached through consensus amongst residents and landowners during previous community consultation.	
		52.7	In relation to the minimum and maximum parking requirements, concerned that there will not be sufficient car parking bays and that overflow parking on the street will become the norm.	Refer to discussion under the heading Car and Bicycle Parking in the Officer Comment section of the report.
		52.8	Concerned that with overflow parking occurring on the street, the current narrow roads will make it difficult to vehicle access and the high volume of traffic may pose as hazardous to locals.	Refer to response to comment 52.7 above.
		52.9	Notes that the draft activity centre plan indicates that there will be widening of some roads, however notes that this will require existing electrical power poles to be removed. Supports the removal of aboveground powerlines however considers that the cost should be borne by developers, and not current residents or ratepayers.	Noted. The undergrounding of power is proposed to be funded by developers through the Development Contribution Plan.

No.	Submitter		Summary of Submission	Officer Comment
		52.10	Requests that the City of Belmont make it a requirement through the development process of DA6 to hold regular consultations with residents and landholders of DA6.	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		52.11	Expressed disappointment that the City of Belmont did not comply with the motion passed by the Councillors on 19 November 2019, which required two information booths to be set up on two weekends during the advertising period. Considers that the alternative YouTube video was not an adequate substitute and not a recognized consultative medium.	In light of the COVID-19 pandemic and associated social distancing requirements, it was not possible, nor appropriate, to proceed with the second information booth or the information session during the public consultation period. Nonetheless, to ensure that the City could continue to engage with the community, a live online information session was scheduled which allowed for the community to submit questions to be answered by a live panel. Whilst it is acknowledged that this was not an identical substitute for what was initially planned, it was well received by community members. City staff were also available to answer questions over the phone or by email (as always), and an extended advertising period was adopted to provide extra time for engagement with the community.
53.	R Foster 140 Coolgardie Avenue, Redcliffe	53.1	Considers that previous concerns raised by residents and ratepayers through previous community consultation have not been addressed and rather have been carried over into the draft activity centre plan.	All previous submissions and concerns raised through community consultation have been carefully considered by the City and addressed where appropriate.

No.	Submitter	Summary of Submission	Officer Comment
		53.2 Traffic modelling does not mention feeder road Stanton Road, Epsom Avenue and Durban S contributing to congestion on Second Street and Ce Avenue.	Street generated from within the precinct, as well as extraneous traffic,
			The modelling also included consideration of the distribution of vehicle trips onto the internal and external road network, including Stanton Road/Second Street as a key access point to the precinct. Notwithstanding, it is considered that an analysis of the wider road network, including Epsom Avenue and Durban Street, would extend beyond the required scope for the draft Activity Centre Plan, particularly given its limited impact on the local network.
			In any event, Stanton Road, Epsom Avenue and Durban Street are classified as 'Local Distributor Roads' under the Main Roads WA Functional Road Hierarchy, and therefore are intended to facilitate the movement of traffic within a local area. It is recognized that traffic has increased on these roads over time, which can be attributed to a variety of factors, including population growth within the local area. The City has, and will continue to monitor traffic volumes on local roads with a focus on maintaining a safe environment.
		53.3 Considers that a signalized intersection at Ce Avenue and Second Street will cause traffic queuing the roundabout at the intersection of Se Street/Bulong Avenue and queuing on Central Av because of the volume of traffic around the train stati	g into Avenue Intersection in the Officer Comment section of the report.
		53.4 Considers that the pedestrian and bicycle frienerwironment within the 800m walkable catchment of train station will become unsafe due to traffic queuing	of the safety problems with pedestrians and bicycles. Typically, a slower

No.	Submitter		Summary of Submission	Officer Comment
		53.5	Considers that any other traffic calming devices situated on Second Street and Central Avenue will slow traffic and increase congestion which will make it unsafe for bicycles and pedestrians.	Refer to response to comment 53.4 above.
		53.6	Notes that the Redcliffe Primary School oval is not able to be administered by the City of Belmont and therefore should not be included in the 10% POS requirement.	Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
		53.7	Considers that Perth Airport should not be relied upon to provide POS to serve DA6 as the City does not administer this land.	Refer to response to comment 53.6 above.
		53.8	Considers that PFAS will be an ongoing problem and notes that DA6 has a 'plume' of PFAS present in the water table.	Prior to the commencement of any development within areas subject to contamination, investigations will need to be undertaken in accordance with the requirements of the <i>Contaminated Sites Act 2003</i> .
		53.9	Notes that the final route of the Southern Main Drain has not been addressed.	This is correct however discussions with State agencies on the preferred alignment of the Southern Main Drain are ongoing.
		53.10	Considers that the having the Southern Main Drain dissect the public open space corridor will reduce the usability of the open space because the drain needs to be wider and shallower to remain unfenced.	Refer to discussion under the heading Southern Main Drain in the Officer Comment section of the report.
		53.11	Notes that the volume of water to be carried by the Southern Main Drain has increased within the last few years with the construction work on the Airport Estate and subsequent draining of large car parks and roofs into the drain.	Perth Airport maintains pre-development flow rates into the Southern Main Drain.

No.	Submitter		Summary of Submission	Officer Comment
		53.12	Concerned with the proposed heights of buildings and the volume of airport noise due to the site's proximity to Perth Airport Estate.	Perth Airport maintains a map of 'prescribed airspace obstacle limitations' that stipulates the maximum height allowed underneath flight paths. Perth Airport have advised that based on the current ground elevation, it is estimated that structures up to 45m above ground level and approximately 60m above the Australian Height Datum should be acceptable and could allow for buildings up to 13 storeys in height. In terms of noise, the precinct is not located within Perth Airport's high noise exposure zone (ANEF contour), and is therefore not subject to any specific requirements or restrictions relating to noise.
		53.13	Considers that the draft activity centre plan does not explain the interface between DA6 and Perth Airport estate (i.e. Costco/DFO and proposed new developments).	In the absence of knowing Perth Airport's ultimate intentions for development adjacent to the precinct, it is not possible to be detailed or specific on interface. Nonetheless, the draft Activity Centre Plan does recognize existing and future development within Perth Airport Estate, including DFO, Costco and a future Neighbourhood Centre. It also considers the integration of the transport network.
		53.14	Notes that Central Avenue was closed on the day that Costco opened which shows that there is a problem with increased traffic down Stanton Road accessing Perth Airport Estate.	For the opening of the Costco development, the City implemented the closure of Central Avenue for vehicles turning left onto Dunreath Drive. This was implemented as a precaution to ensure that traffic and parking was being contained within the designated car parks and to mitigate any impact, however it was not necessary to retain this closure as all demand was catered for within Perth Airport estate.
		53.15	Considers that the draft activity centre plan and any future DA6 redevelopment documentation include a governance component/clause which stipulates:	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
			(i) The acknowledgement and inclusion of resident DA6 landowners.	

No.	Submitter	Summary of Submission	Officer Comment
		(ii) That the City of Belmont hold regular community engagement activities to be in the form of a community reference group comprising 12 local resident landowners and 2 proxy resident landowners chosen with approval by the DA6 community.	
		(iii) The requirement for two of the four regular community engagement activities conducted by the City to be in the form of consultative workshops with the 12 community representatives that:	
		a) Reviews any land assembly recommendations and processes and evaluates options that may be available for a group or groups of DA6 resident landowners to offer a parcel or parcels of properties to market should these landowners be interested in doing so. That in this process residential community landowners are given equal status and consideration by the City, any other state government agency, and Perth Airport to that given to commercial investors and redeveloping landowners in DA6.	
		b) Includes industry representatives i.e. town planners (in addition to City Officers), developers, builders, commercial realtors and a solicitor independent from the City.	

No.	Submitter		Summary of Submission	Officer Comment
			(iv) That the City identifies the location of infrastructure/construction works and provides three months' notice to DA6 residents before it intends for such works to commence together with project timelines, and what mitigation strategies the City will require be implemented to ensure OHS compliance and how these strategies will protect local resident amenity during the period of works.	
54.	A Feast & J Ricciardi 146A Coolgardie Avenue, Redcliffe	54.1	Opposes the proposed new road (Road 3) connecting Bulong Avenue to Second Street as it will lead to increased traffic and danger to small children and elderly that live in the street.	Refer to discussion under the heading Bulong Avenue and Second Street Connection in the Officer Comment section of the report.
		54.2	Opposes the rezoning of the precinct and proposal of 6, 8 and 13 storey residential developments. Considers that this is unsuitable to the suburban community and that in light of the COVID-19 pandemic, high density living is a greater risk to everyone in the area. Considers that it will lead to anti-social behavior.	Refer to discussion under the heading Building Height in the Officer Comment section of the report. It is considered that the COVID-19 pandemic is not a logical reason to not support higher density living giving that various benefits that it delivers, and there is no evidence to suggest that it leads to anti-social behavior.
		54.3	Encourages the design implementation of green public open space in the community.	Noted.

No.	Submitter		Summary of Submission	Officer Comment
55.	Belmont Resident and Ratepayer Action Group Inc.	55.1	Notes that Stanton Road is being used as a rat-run for traffic through to the airport area and that traffic has increased significantly with the last count in November being 10,400 vehicles per day, which was taken before Costco was opened. Considers that the train station will also increase the traffic rat-running through the rest of Belmont using Stanton Road. Notes that the additional traffic using the train station park and ride will likely be locals.	Stanton Road and Second Street are designated as 'Local Distributor Roads' under the Functional Road Hierarchy on the basis that they carry through traffic between Epsom Avenue and Central Avenue (formerly Brearley Avenue). The draft ACP does not propose to change the classification of these roads given that they will continue to serve as a key access point into the precinct. Nonetheless, traffic modelling indicates that vehicle movements will increase on most roads overtime, including Stanton Road/Second Street, particularly from the introduction of the Redcliffe Train Station and uses undertaken in Perth Airport Estate. It also recognizes that there is potential for vehicle throughmovements (rat-running) within the precinct. To address this, the draft ACP proposes measures to discourage through movements in the precinct and overall improve safety. Refer to discussion under the heading Movement Network in the Officer Comment section of the report.
		55.2	Considers that the City of Belmont has done nothing to deter people living outside of the City of Belmont using the rat-run to get to the airport.	Refer to response to comment 55.1 above.
		55.3	Considers that DA6 is going to affect a lot of residents in the Redcliffe area and on the rat-run and that the City of Belmont should be taking immediate action to address this issue. Considers that it is not an attractive proposition to buy a property where you have a high volume of traffic and getting in and out of your property is difficult.	Refer to response to comment 55.1 above.
		55.4	Suggests that one solution that should be urgently looked at is a speed reduction on Stanton Road from Epsom Avenue to 40km/h. Notes that there are two primary schools in this area and there have been a number of vehicle accidents. Considers that further traffic management should be installed to deter the use of this road for rat-running.	The draft ACP is proposing measures to slow vehicle traffic within the Redcliffe Station precinct, which includes the installation of traffic management devices, to deter vehicle through-movements. Nonetheless, it should be recognized that Stanton Road/Second Street and classified as Local Distributor Roads and therefore are intended to carry vehicle traffic through the local area.
		55.5	Considers that any non-compliance with a new speed limit should be addressed by point-to-point cameras, which will serve as a great revenue raiser.	The City of Belmont is not responsible for traffic enforcement in the local area and this suggestion extends beyond the scope of considering the draft ACP.

No.	Submitter		Summary of Submission	Officer Comment
		55.6	Considers that the overall concept of using on-street parking to slow traffic and provide further parking for surrounding properties is not an ideal solution. Considers that this could cause a safety issue with parked cars obstructing view lines.	The provision of on-street parking is widely recognized as a mechanism for controlling vehicle speeds in local streets. The design of on-street parking and the upgraded road environment will aim to reduce traffic speeds and in turn, improve safety, and will need to be designed appropriately to ensure that vehicle sightlines are maintained.
		55.7	Considers that the proposal for an additional 736m <sup>2</sup> of public open space in the entire precinct in comparison to the current amount of public open space is insufficient for the additional 7,500 people that are expected to inhabit the area. Whilst the overall ratio may comply with the Western Australian Planning Commission's Liveable Neighbourhoods, the end outcome for residents is more development, more people and less public open space per person to what currently exists.	The draft ACP has been revised to increase the public open space provision by 2,409m <sup>2</sup> from the existing amount provided in the area, which is equivalent to 9.46% of total developable land within the precinct. Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
		55.8	Considers that if families are being encouraged into this area, then it is unrealistic to expect that just because of the train station, that they will not have a car.	It is realistic to assume that there will be some level of car ownership within the precinct; however access to high frequency public transport reduces the reliance on private cars.
		55.9	Does not support imposing a maximum car parking requirement and considers that the provision of additional parking should be encouraged.	Refer to discussion under the heading Car and Bicycle Parking in the Officer Comment section of the report.
		55.10	Does not support allowing the City to have discretion in determining parking requirements as it will lead to inconsistencies between the assessments of various planning officers.	Refer to response to comment 55.9 above.
		55.11	Considers that multi-storey development is more suitable in this area for short stay accommodation or one bedroom apartments, as travelers will have access to the train station and one bedroom apartments are more likely to have just one car.	The draft Activity Centre Plan provides for short-stay accommodation uses within the Mixed Use zone, being the Centre and Activity Corridor Sub-Precincts surrounding the train station and along Great Eastern Highway, respectively.

No.	Submitter		Summary of Submission	Officer Comment
		55.12	Concerned that DA6 will be planned like The Springs and have issues with access and parking.	There is no evidence to suggest that the DA6 precinct will have issues with access and parking. Notwithstanding, the precinct is dominated by the presence of the major primary distributor roads of Great Eastern Highway and Tonkin Highway to the north and west, and Perth Airport Estate to the south, which limits opportunities to create additional access points. In terms of parking, refer to discussion under the heading Car and Bicycle Parking in the Officer Comment section of the report.
		55.13	Considers that the provision of publicly accessible private open space on a development site, for the purposes of being eligible for building height bonuses, is not an adequate trade-off and does not reflect what residents understood or envisaged for their neighbourhood. Considers that the bonus height allowances should be removed and that the maximum requirements firmly established in accordance with the expectations of residents.	Refer to discussion under the heading Development Bonus Criteria in the Officer Comment section of the report.
		55.14	Concerned that Redcliffe Primary School will be unable to accommodate increases in population in the area.	The Department of Education is aware of future population projections in the area which are factored into their forward planning for local schools.
		55.15	Concerned about the types of development that would occur in the Mixed Use zone and its compatibility with adjacent residential development.	The land use permissibility for the Mixed Use zone has specifically been considered in light of the compatibility of residential and non- residential land uses. Nonetheless, it is not unreasonable to assume the potential for land use conflict in a high density, mixed use environment, in which case it should be acknowledged that the Residential Design Codes – Volume 2 includes design provisions to minimize conflict between residential and non- residential land uses.
		55.16	Considers that there has been a lack of consultation with community groups and landowners that are affected by the draft activity centre plan.	The purpose of undertaking pre-consultation on the draft Activity Centre Plan is to provide the community with an opportunity to provide feedback and comments, prior to progressing through the statutory advertising process.

No.	Submitter		Summary of Submission	Officer Comment
		55.17	Considers that there should be a community reference group participating in regular meetings, updates and workshops with the City of Belmont and other stakeholders, so that a good outcome can be attained for everyone.	Refer to discussion under the heading Facilitation of Redevelopment Process in the Officer Comment section of the report.
		55.18	Questions whether high density development in DA6 will create affordable housing.	There are many factors that influence the affordability of housing, however typically an increase in supply and housing diversity will improve affordability in an area. The redevelopment of the Redcliffe Station precinct will increase the supply and diversity of housing in the Redcliffe area, which is currently experiences low population growth and is dominated by single detached housing, and therefore is likely to improve affordability.
		55.19	Questions the viability of development in the precinct.	Refer to discussion under the heading Attractiveness and Viability of Redevelopment in the Officer Comment section of the report.
56.	Seasons Funerals 397 Great Eastern Highway, Redcliffe	56.1	Concerned about traffic cutting through the DA6 area and the recommendations for traffic management to control it.	Refer to discussion under the heading Movement Network in the Officer Comment section of the report.
		56.2	Notes that the modelling assumes a speed of 20km/h for Boulder Avenue, Road 1 and Kanowna Avenue, presumably as a way to reduce rat-running, however concerned there is no discussion or mention of what happens (in the model) if the speed reduction is not achieved.	Following the detailed design and delivery of local road network upgrades, any issues that may arise will require investigation/monitoring, and where appropriate/necessary, additional or modified measures may need to be implemented.
		56.3	Concerned that the proposed traffic calming measures will prevent funeral vehicles, which have long wheel bases with limited clearance, from being able to traverse the only route provided for entry and exit to their site. Notes that access to their site is currently restricted as their vehicles are not able to 'U' turn at the Coolgardie Avenue/Great Eastern Highway intersection.	The ultimate design of the upgraded local road network requires further detailed planning which will occur at a later date; however consideration will be given to the local access needs of existing residents and businesses in the precinct.

## Agencies

No.	Submitter	Summary of Submission	Officer Comment
57.	Department of Communities	<ul> <li>57.1 <u>Alignment with the State Planning Framework</u></li> <li>Communities acknowledges that the draft activity centre plan complies with the overall objectives of the State planning framework and initiatives, namely:</li> <li>State Planning Strategy</li> <li>Perth and Peel @ 3.5 million</li> <li>Central Sub-Regional Planning Framework</li> <li>State Planning Policy 7.3 – Volumes 1 and 2</li> <li>State Planning Policy 4.2 – Activity Centres for Perth and Peel</li> <li>METRONET</li> <li>Planning Reform</li> <li>It is noted that the City proposes to significantly increase the average residential density in DA6, due to its proximity to the Great Eastern Highway activity corridor and Redcliffe Train Station. Whilst this complies with contemporary planning practice in theory, Communities suggests the City re-consider the densities and development provisions. The contextual setting of the area, the existing built form, existing and proposed density and fragmentation of property ownership may result in a significant delay before redevelopment has begun and a subsequent delay in achieving the vision of the draft activity centre plan.</li> </ul>	Noted. Refer to discussion under the heading Attractiveness and Viability of Redevelopment the Officer Comment section of the report.

No.	Submitter	Summary of Submission	Officer Comment
		57.2 <u>Perth and Peel @ 3.5 Million and Central Sub-Regiona</u> <u>Planning Framework</u>	1
		The Framework builds key principles and structural elements for the development of Perth, specifically increasing urban infill to accommodate sustainable future growth. However, such infill should avoid land use conflicts by taking into account buffer requirements such as those for industry, airports and wastewater treatmen plants.	
		The Framework seeks to optimize the use of land close to existing transport infrastructure and key centres of activity and amenity. The Central Sub-Regional Planning Framework defines areas including activity centres where an increased focus on housing, employment and associated amenity (not just essential services such as transport, water and electricity but also open space schools and shops) should occur.	
		The City's overall intent for Redcliffe in terms of the activity centres hierarchy is unclear. The Central Sub Regional Framework provides an indicative boundary fo the Perth Airport Specialised Centre which encompasses DA6. The draft activity centre plan explanatory report states that the centre is also identified as a secondary centre within the Central Sub-Regional Planning Framework. It is Communities understanding tha Belmont is designated as a secondary centre and the indicative boundary provided in both Plan 2 of the Central Sub-Regional Planning Policy 4.2 – Activity Centres for Perth and Peel does no include Redcliffe which is located further east and included within the indicative boundary of the Perth Airport Specialised Centre.	and Retail Floorspace in the Officer Comment section of the report. It should be noted that SPP 4.2 simply specifies a desirable density target which in no way is intended to limit the amount of density that should be achieved. This is especially relevant given that the centre will contain Redcliffe Train Station, which is not typical of a generic neighbourhood centre and will require adequate supporting population within its catchment. In addition, the findings of the Retail Needs Assessment indicate that a certain level of population is required in the area to provide demand for retail convenience uses. Lowering density within the precinct would undermine the ability to create a successful transit oriented development precinct.

No.	Submitter	Summary of Submission	Officer Comment
		The City considers Redcliffe to be akin to the functions a neighbourhood centre as set out in SPP 4.2 and also alignment with the functions of a station precinct which what the centre will ultimately become. Communities s a lack of consistency between the provisions and draft activity centre plan and those of a neighbourhod centre if that's what the City desires the centre become. The proposed density of 52 dwellings per gro ha is over double the desirable density of 25 dwelling per gross ha for neighbourhood centres as prescribed SPP 4.2 and even higher than the desirable density forward in SPP 4.2 for strategic metropolitan centres. Communities requests that the City clarify its intent Redcliffe and how it will function as an activity cent Should the City have a desire for the centre to function a neighbourhood centre, it is suggested that proposed densities are reduced to more in line with tho put forward in SPP 4.2, reflect more of an aspiration medium density dwellings rather than high densi development. The density proposed in the draft activic centre plan will be in stark contrast to the surround areas currently coded R20, with little provision be made for adequate transition between low and h density on the peripheries of the precinct.	in is ee he od to ss gg in bout for re. as he se for ity ity ity ng ng gh
		<ul> <li>57.3 Alignment with SPP 7.2 Residential Design Codes Volume 2</li> <li>It is noted that the Primary Controls Table in the diactivity centre plan varies the provisions of the R-Cod notably rear boundary setbacks and car and bicy parking requirements. It would be helpful if the diactivity centre plan could note and provide justificat where controls vary from those prescribed within the Codes.</li> </ul>	Design Codes in the Officer Comment section of the report. aft aft on

No.	Submitter	Summary of Submission	Officer Comment
		Communities question whether the maximum car requirement set out in the draft activity centre pla be greater than the requirement as per Table 3. R-Codes given the vision of Redcliffe as a transit development based upon its proximity to Perth Redcliffe Station and the public transport oppor afforded by its location.	n should 9 of the oriented Airport,
		57.4 <u>Minimum Development Site Requirements</u>	
		As an affordable housing developer and advoc have concerns that the minimum site area frontage requirements, drafted in order to trigg assembly to enable redevelopment may either s or sterilize the redevelopment potential within the least over the short term. This may be the case u time that market appetite increases for private scale land assembly and redevelopment which current market conditions is likely to take many ye	and lot ger land stagnate area, at ntil such e, small- n, given
		Communities own 11 assets (lots, irrespective of in the DA6 area. They are located within the Transition, 'Residential Core' and 'School Interfa precincts. Of those 11 assets, only 5 assets are be developed as per the minimum development s An example of this is Lot 5 (73) Second Street 1,474m <sup>2</sup> lot in the Residential Core sub-precin draft activity centre plan designates the site as R a minimum lot size of 1,600m <sup>2</sup> , under these p provisions, this lot can't be developed as a sta site.	'Centre ce' sub- able to ite area. which is not. The 100 with roposed

No.	Submitter	Summary of Submission	Officer Comment
		Development potential is further curtailed within the Stanton Road precinct given the presence of Black Cockatoo habitat and 'good' to 'degraded' areas of Banksia Woodland which the City themselves recognized in their submission to the WAPC on the proposed MRS amendment – Redcliffe Connect Precinct. These, as well as the location of the bushfire prone area make these sites less appealing in the market place for development in the first place and the minimum site requirements compound this. The proposed density for the sites within the Stanton Road precinct is R-AC3. This seems ambitious given the constraints facing areas of this precinct.	
		57.5 <u>Previous Discussions with City regarding Communities</u> <u>assets in Stanton Road</u> In December 2019, Communities engaged Elton Consulting to undertake a high-level assessment of the suitability of land owned by the Housing Authority along Stanton Road, Redcliffe for the development of a head office and main service centre for Rocky Bay (the Rocky Bay centre). The City were generally open to seeing the sites being used for mixed use, however we note that these sites are now designated for residential use within draft activity centre plan with provision for only the ground floor to transition to a mixed use over time.	The suggestion that the Mixed Use zone should be expanded to encompass additional Department of Communities owned property along Stanton Road is not supported. This is on the basis that it could erode the Mixed Use 'core' immediately surrounding the Redcliffe Train Station, as well as the residential amenity and intent of the area. It should be noted however that there are a range of non-residential land uses which would be permissible in the Residential zone, including a Child Care Premises, a Civic Use, a Community Home and a Nursing Home. Refer to further discussion under the heading Sub-Precinct Boundaries in the Officer Comment section of the report. In terms of the Mixed Use zone itself, it is acknowledged that the draft ACP includes a minimum requirement for residential development on all properties, with the exception of the Urban Corridor Sub-Precinct where the requirement can be substituted for short stay accommodation land uses. To provide greater flexibility in the Mixed Use zone, the draft ACP has been modified to allow some discretion in varying the minimum density requirements. It is considered that this discretion would only be used in limited circumstances where it can be demonstrated that non-residential development in the Mixed Use zone can contribute significant activity and employment to the area.

No.	Submitter	Summary of Submission	Officer Comment
		Communities consider that these sites, east and west of Stanton Road, could be considered landmark sites given their location facing Tonkin Highway on the boundary of DA6, within walking distance of the new train station. As such we would advocate for more flexibility in the permissible uses for these sites to allow for a greater mix of uses including community uses which could support the wider area.	
		Preparation of Development Contribution Plan         A Development Contribution Plan (DCP) is intended to be implemented for the Redcliffe Station Precinct, by way of a local planning scheme amendment. Communities is generally supportive of any initiative that provides for fair and reasonable cost contributions towards necessary infrastructure, however a review of the DCP as proposed shows that there are significant shortcomings, raising concerns about its successful and equitable implementation. We would like to take this opportunity to reiterate our willingness to cooperate with the City and provide consultative feedback on the formulation of any DCP in the future.         Our comments on the proposed DCP and items to be funded are predominantly on the following issues:         Proposed unit of calculation         Area included within the DCP         Need and nexus of items included	Refer to discussion under the heading Development Contribution Plan in the Officer Comment section of the report.

No.	Submitter	Summary of Submission	Officer Comment
		The DCP states that the unit of calculation to be applied is per square meter of site area, varied between sub- precincts to reflect their development potential. Draft SPP 3.6 – Infrastructure Contributions – Guidelines (July 2019) outlines that the unit of charge that is seen as the most equitable is per dwelling unit. We would urge the City to consider revising the unit of charge, to ensure that the need and nexus of the actual demand of infrastructure is clearly and fairly apportioned to the demand generated by high-density development. Figure 101 of the draft activity centre plan provides the area to be included within the DCP. This area currently includes the Redcliffe Primary School, including the oval. The Guidelines outline that the DCP is to be carefully considered to ensure that he land included within it shares common characteristics. The Guidelines detail that land which is not generating demand for infrastructure, such as public open space and existing or planned Government primary or secondary schools should be excluded from Development Contribution Area.	

No.	Submitter	Summary of Submission	Officer Comment
		As a general comment the items to be included within the DCP should be clearly apportioned to new demand, created by development rather than infrastructure required to facilitate infill development. Draft SPP 3.6 details that there are two types of infrastructure required to support urban consolidation:	
		<ul> <li>Lead Infrastructure: infrastructure required to increase the amenity of the area, such as street upgrades, public realm improvements and public transport.</li> </ul>	
		• Lag Infrastructure: infrastructure provided after the population has increased, to meet an increased community need. Lag infrastructure in an urban infill context could include upgrades to parks and other community facilities. The provision of lag infrastructure would generally be funded through local government property rates or other mechanism.	
		Items noted to be included should be carefully analysed to ensure that the existing demand is not apportioned to developers of new development, as the beneficiary to pay principle would require that those costs were borne by the City. Should mechanisms such as a special area rate be required to ensure that the costs are fairly attributed between stakeholders, this should be considered by the City as early in the process as practical.	
58.	Department of Water and Environmental Regulation	58.1 The Department notes that a Local Water Management Strategy (LWMS) has been prepared for the site. The Department has not undertaken an assessment of this document, however as the proposal is to increase the density of an already developed area, and water sensitive urban design principles are being incorporated, the Department defers the assessment of the LWMS to the City of Belmont and Water Corporation.	Noted.

No.	Submitter		Summary of Submission	Officer Comment
59.	Water Corporation	59.1	Funding and Pre-Funding Infrastructure The Water Corporation notes that the statements made	The draft ACP has been modified to address this comment.
			in the draft activity centre plan under sections 5.3 – Water Supply and 5.4 – Wastewater regarding funding and pre-funding are incorrect. The proponent will not need to fund any water or sewerage headworks infrastructure required, and whilst they are not on the Water Corporation's Capital Works Programme, they will be funded and constructed when required by the Water Corporation. All new or upgraded reticulation mains will need to be paid for by the proponent via the proposed Development Contribution Plan. Requests that all references to 'pre-funding' be removed.	
		59.2	Water	
			Reticulated water is currently available to the subject area. All water main extensions required for the development site, must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.	Noted.
			Due to the proposed increase in development density, upgrading of the current system will be required to prevent existing customers being affected by the proposed development.	Noted.
			A few reticulation mains will need to be upgraded to DN300 headworks mains. There is a number of new or upgraded water reticulation mains required.	Noted.
			Refer to Plan 2373-SK-005-1 in the Infrastructure Servicing and Cost Estimate Report that indicates the upgrades required.	Noted.
			When the future demands are finalized they should be provided to the Water Corporation where we will need to review the proposed development again.	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		The proposed water reticulation extensions/strategy outlined in the report will need to be further refined by consultant engineers at the subdivision stage in consultation with our Land Servicing Section.	Noted.
		It is also recommended that a Water Reticulation Concept Plan similar to the examples included in the Water Corporations Developers' Manual be produced. The concept plan should be accepted by both the City of Belmont and the Water Corporation as a true reflection of the reticulation works required to service the area due to the proposed development. The Concept Plan can be then used to estimate the cost of the reticulation works that could be included in the developer contribution scheme.	The draft ACP already incorporates concept plans that illustrate the extent of works required which have been used to inform the preparation of the DCP.
		Existing water mains were located throughout the subject area. Pressured water mains shall not be located in private land and should be located in and protected by reserves (i.e. road reserves) as no development would be allowed in this area. The existing water mains may need to be relocated when subdivision (road realignment) takes place. Whenever development is proposed near Water Corporation assets the applicant/owner needs to submit an Approval of Works application.	Noted.
		59.3 <u>Wastewater</u>	
		Reticulated sewerage is currently available to the subject area. All sewer main extensions required for the development site must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.	Noted.
		Due to the proposed increase in development density, upgrading of the current system will be required to prevent existing customers being affected by the proposed development.	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		Headworks infrastructure including the Coolgardie Ave pump station and pressure main will require to be upgraded. The headworks main that the Coolgardie Ave pressure main discharges into will also need to be upgraded. There is also a number of new or upgraded sewer reticulation mains required.	Noted.
		Please refer to plan 2373-SK-004 in the Infrastructure Servicing and Cost Estimate Report that indicates the upgrades required.	Noted.
		When the future demands are finalized they should be provided to the Water Corporation where we will need to review the proposed development again.	Noted.
		The proposed water reticulation extensions/strategy outlined in the report will need to be further refined by consultant engineers at the subdivision stage in consultation with our Land Servicing Section.	Noted.
		It is also recommended that a Wastewater Reticulation Concept Plan similar to the examples included in the Water Corporations Developers' Manual be produced. The concept plan should be accepted by both the City of Belmont and the Water Corporation as a true reflection of the reticulation works required to service the area due to the proposed development. The Concept Plan can be then used to estimate the cost of the reticulation works that could be included in the developer contribution scheme.	The draft ACP already incorporates concept plans that illustrate the extent of works required which have been used to inform the preparation of the DCP.
		It should be noted that existing sewerage mains are located throughout the subject area. Due consideration will be required when developing in this area. The developer is required to fund the full cost of protecting or modifying any of the existing infrastructure which may be affected by the proposed development. Whenever development is proposed near Water Corporation assets the applicant/owner needs to submit an Approval of Works application.	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		59.4 <u>Drainage</u> The subject area falls within the Perth Airport Souther Main Drain Drainage Catchment. Our drainage syste can only take predevelopment flows. So the develop will need to compensate any additional flows on their ow land.	m er
		The Perth Airport Southern Main Drain, major drainage infrastructure, is located within to the subject area. The proponent responsible for the development of this area required to fund the full cost of protecting or modifying any of the existing Water Corporation drainage facilities or infrastructure which is affected by development.	e is g
		Before the Redcliffe Station Activity Centre Plan accepted or approved the Water Corporation strong recommends that a Local Water Management Strateg (LWMS) should be undertaken over the whole are where the best practice Water Sensitive Urban Desig principles in urban drainage can be considered. A LWMS would also indicate the amount of land that wou be required for all drainage purposes and there b indicate the amount of land that can be developed. could also indicate if bunds are required around th public open spaces that are proposed to include th Perth Airport Southern Main Drain.	ly Officer Comment section of the report.
		The Water Corporation does not consider the propose 'terraced urban stream' is the best Water Sensitive Urba Design option for the Perth Airport Southern Main Drain.	n

No.	Submitter	Summary of Submission	Officer Comment
		Depending on the final design, the terraced swale prof of the proposed Urban Stream could be a public safe hazard and may have to be fenced off. Provision for maintenance access track also needs to be ma alongside the Main Drains baseflow channel throu public open space area. The Water Corporation is hap to work with the City of Belmont to produce the be option, which should be a Living Stream. Please refer the 'Department of Water and Environmental Regulation and the 'Water Corporations' Drainage for Liveability Fa Sheet - Living Streams in Water Corporation assets.	ty stream concept could pose a public safety hazard in the absence of detailed design work being undertaken. de gh by st to us'
		59.5 <u>General Comments</u>	Noted.
		The Water Corporation has considerable land holdings the subject area. The land tenure model (Wa Corporation land interest) has not been determined. It recommended that at an early stage the Wa Corporations Procurement and Property Branch involved to determine all land acquisition requirements.	er is er
		The proponent responsible for the development of the area is expected to provide all water and seweral reticulation if required. A contribution for Water Sewerage and Drainage headworks will also be required when development occurs. In addition the proponent were required to fund new works or the upgrading existing works and protection of all works. But plea note as mentioned previously all water and sewera headworks infrastructure will be upgraded by the Water Corporation when required.	ge er, ed vill of se ge
60.	Perth Airport	60.1 <u>Airspace Assessment</u> Although the Draft plan area is located laterally to Pe Airport's existing and future runways, Perth Airpor prescribed airspace in this area is complex and may po constraints on the height available for development with the area.	t's Se

No.	Submitter	Summary of Submission	Officer Comment
		The height available for any structure will be dependent on the earthworks and the finished floor level of the specific development. Based on the current ground elevation it is estimated that structures up to 45m above ground level (up to 60m AHD) should be acceptable. This is on the basis that Perth Airport considers maximum elevation of structures to be the absolute highest point of a development (i.e. the top of any antennae, plant or equipment situated on the roof). It may be possible for this height to be slightly exceeded following a successful assessment by Airservices Australia, CASA and/or the Department of Infrastructure, Transport, Cities and Regional Development; however this would be on a case-by-case basis. A substantial portion of DA6, namely the Centre Sub- Precinct, is within the Wind Shear envelope for Runway 06 Approach/24 Take off. Wind shear modelling, at the applicant's cost, may be required for significant buildings to ensure the risk to aircraft is acceptable.	
		<ul> <li>60.2 <u>Ground Transport</u> The plan indicates the re-connection of Central Avenue and Bulong Avenue through to Great Eastern Highway may be contemplated after relocation of regular passenger transport services from T3 &amp; T 4. These future road connections are supported as they would facilitate Perth Airport's objective to make Airport West more accessible to vehicular movements. </li> <li>60.3 <u>Services</u> The future development of DA6 will require additional draw or outfall of services and the impact this may have on Perth Airport's requirements in the long term for existing and future development of the airport estate are unquantifiable, and therefore may be of concern. Comments on the range of services are provided below:</li></ul>	It is necessary for Perth Airport to undertake the necessary planning to ensure that the demand generated from their development can be adequately accommodated by existing infrastructure, and undertake upgrades where necessary.

No.	Submitter	Summary of Submission	Officer Comment
		Water supply - Consult with the Water Corporation regarding service level requirements for potable water and fire supply.	
		<ul> <li>Power - Potential for power supply from Belmont Substation to be utilised by future development in DA6. This may result in shortfalls in supply for use on the airport estate. Western Power to be consulted.</li> </ul>	
		• Wastewater - A new pump station is proposed in the plans however it appears to be pumping to the same outfall gravity line which Perth Airport currently utilises. Perth Airport has a fixed wastewater volume, therefore when the DA6 volumes rise they will further restrict Perth Airport's ability to raise outfall volume. Suggest liaising with Water Corp planning department.	
		• Gas - Supply lines are earmarked to be enhanced and Perth Airport supply requirements for the development of Airport West should be accounted for in the upgrade. Consultation required with ATCO Gas.	
		• Communications - Commercial communications will be upgraded as required by the various suppliers as per their current regimes.	

No.	Submitter	Summary of Submission	Officer Comment
		<ul> <li>60.4 <u>Aircraft Noise Assessment</u></li> <li>Although the subject Draft plan area is located outside the endorsed 2020 Australian Noise Exposure Forecast (ANEF), future residents will be subjected to aircraft noise events during the day and evening as demonstrated by the N65 and N60 contours. Noting the development types proposed for DA6 will predominately be multi-storey residential apartments; aircraft noise impacts are less of a concern for Perth Airport due to the internal dwelling insulation that is generally included in between each apartment during construction, and the resident expectation for general noise that arises when living in an apartment setting.</li> <li>Should a decision be made to decommission the existing cross runway, this will also lessen potential aircraft noise impacts to future residents in DA6.</li> </ul>	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		60.5 Land Use DA6 abuts the Airport West Precinct on the Perth Airport estate. As outlined in Perth Airport Master Plan 2020, regular passenger transport services are aiming to be consolidated to Airport Central in 2025. As Perth Airport is prohibited from developing residential dwellings under the provisions of the <i>Airports Act 1996</i> , and there will be no requirement to develop land for further aviation purposes, the vast quantities of available land in the Airport West precinct will be developed with non- residential land uses. This development has commenced (DFO, Costco, Alpha, Bravo and Echo Offices) and plans are being put in place for this to continue. The City's plan to increase the residential density in the abutting suburb of Redcliffe by way of the provisions of this draft activity centre plan, are strongly supported by Perth Airport. Development of DA6 would support Perth Airport's planned non-residential and non-aviation development of Airport West. An increased number of people in the area having access to good, services, entertainment and employment opportunities are seen as mutually beneficial for the City and Perth Airport. This proximate location has been identified in the SWOT analysis contained within the City's Draft report, and Perth Airport reiterates this opportunity.	Noted.

No.	Submitter		Summary of Submission	Officer Comment
		60.6	<ul> <li><u>Movement Network</u></li> <li>The objectives of section 7.4 (Cycling and walking), and more generally the intention to ensure the precinct is well connected, is supported. This is particularly important for the pedestrian route moving south from Redcliffe Station towards the airport estate (through P04 and the Kiss and Ride as indicated on Figure 76 and 78). For this route to link up to Central Avenue, it would rely on Perth Airport providing access through the airport estate (the 'lot' is known as Site 41b). As this would be a commonly used public route for public transport users accessing the Park and Ride carpark off Central Avenue, it is considered that further thought and detail needs to be provided to ensure user safety, and to protect this route and the sightlines from the station to the carpark; at least comparable in detail to that provided for POS 1, 2, 3 and 5.</li> <li>As a related side note, Perth Airport is currently undertaking a traffic and pedestrian safety improvement plan for Airport West. As the planning for both this safety plan and the subject draft activity centre plan progress, Perth Airport considers, through continued work with the City, the 'boundary' that exists between the City's Local Government area and the Perth Airport estate can be figuratively removed and a cohesive area, and experience for users created.</li> <li>Moving forward, it is recommended that all development applications in this area are forwarded to Perth Airport for review and comment. Further, it is highly advisable that developers of these sites are encouraged to engage with Perth Airport early in the planning and design process.</li> </ul>	The design of the Redcliffe Train Station forecourt and plaza area has already been approved and will be implemented as part of the Forrestfield Airport Link project works. It is considered unnecessary to replicate this information within the draft ACP, particularly as it will be delivered in the near future. The importance of ensuring that development within Perth Airport estate integrates with the Redcliffe Station precinct is recognized, however the ACP has no jurisdiction over Perth Airport development. Nonetheless, the City will seek to collaborate with Perth Airport to ensure harmonization with the precinct.
61.	Department of Biodiversity, Conservation & Attractions	61.1	The subject site is located within 500 metres of the Swan River. In accordance with State Planning Policy 2.10 Swan Canning River System and State Planning Policy 2.9: Water Resources, the development should not result in the mobilisation of nutrients, contaminants and sediment from the site to the river.	Noted.

No.	. Submitter	Summary of Submission	Officer Comment
		61.2 <u>Part 1: Implementation</u> • 6.5 Urban Corridor Precinct (p 28):	The inclusion of such an objective is considered unnecessary given that deep soil areas for trees would be required by State Planning Policy 7.3.
		The precinct objectives in Section 6.5.2 and Figure 13 should include provision for a deep soil area fo trees and on-site stormwater management, in accordance with State Planning Policy 7.3 Residential Design Codes Volume 2 - Apartments.	
		<ul> <li>7.2.3 Sustainable Integration of Storm wate Drainage (p 31):</li> </ul>	r Noted.
		The proposed water sensitive stormwate management approach for new/upgraded roads i strongly supported.	
		<ul> <li>7.5 Public Open Space (p 32):</li> <li>The proposed integration of stormwate management within open space and public realn areas and the retention of mature trees are strongl supported.</li> </ul>	1
		Section 8.1.5 'Sustainable Integration of Stormwater Drainage' of Section 7.5 (p 33): the design and delivery of integrated stormwate drainage within the open space network, including integration of the Southern Main Drain, should also result in improved water quality because the Southern Main Drain discharges into the Swan River. The current text just states to better manage the 'storage and flow of drainage' and ensure 'high quality, usable open space'.	

No.	Submitter	Summary of Submission	Officer Comment
		<ul> <li>7.8 Studies and Plans Required (p 34): Table 9, which lists what types of documents are to be submitted and when, is supported. It is requested that Dewatering Management Plans are added to Table 9. Dewatering Management Plans should be submitted before the application for a building license.</li> </ul>	The draft ACP has been modified to address this comment.
		<ul> <li>61.3 <u>Part 2: Explanatory Report</u></li> <li><i>1.4.4 State Planning Policies (p 60):</i> This section should also refer to State Planning Policy 2.9: Water Resources and State Planning Policy 2.10 Swan Canning River System, due to the proximity of the site to the Swan River.</li> </ul>	The draft ACP has been modified to address this comment.
		• 4.3.4 Drainage Design (p 139): The proposed water sensitive urban design approach is commended and supported. It is recommended that Section 4.3.4 states that the focus for water quality treatment in this locality is to reduce sediment, litter and metals, as well as the already mentioned hydrocarbons.	The draft ACP has been modified to address this comment.
		<ul> <li>5.7 Drainage Management (p 166): It is recommended that this section is re-titled 'Urban Water Management' because it addresses more than stormwater and shallow groundwater management (i.e. drainage).</li> <li>The proposed water sensitive urban design approach is commended and supported.</li> </ul>	The draft ACP has been modified to address this comment.

No.	Submitter	Summary of Submission	Officer Comment
		The stormwater management approaches should be based on the Stormwater Management Manual for Western Australia (DoW 2004 - 2007), the Decision Process for Stormwater Management in Western Australia (DWER 2017) and the Corporate Policy No 49: Planning for Stormwater Management Affecting the Swan Canning Development Control Area (DPaW and SRT 2017). This should include that public realm infrastructure should also be retaining (e.g. using, not just infiltrating stormwater) and treating stormwater.	
		The average recurrence interval terminology should be replaced with the exceedance per year (EY) and annual exceedance probability (AEP) terminology used in the latest version of Australian Rainfall and Runoff and the Decision Process for Stormwater Management in Western Australia.	
		Table 35 (p 173): It is unclear from the 'drainage system maintenance' row what drainage infrastructure is proposed to be 'cleared biannually'. The vegetated swale / urban stream and the roadside raingardens should not be cleared because this would remove the in-stream/low flow channel vegetation and raingarden vegetation that is required for water quality treatment. Different types of drainage infrastructure have different maintenance requirements. The 'requirement and	
		period' column should state that a drainage maintenance plan is to be prepared as part of the UWMP and is to be implemented as a subdivision condition, which might include a requirement for bi- annual inspection and maintenance (e.g. side entry pits should be inspected at least twice year).	

No.	Submitter	Summary of Submission	Officer Comment
		Table 35: Non-structural controls should be included in the UWMP. Street sweeping should be included in the list of relevant non-structural controls.	
		Table 35: Structural controls: remove text about drainage infrastructure to be cleared bi-annually.	
		• 6.3.1.5 Southern Main Drain Realignment (p 182):	Noted.
		The water quality and water quantity within Southern Main Drain impact the health of the Swan River. The Southern Main Drain is a known contributor of pollutants, such as nutrients and per- and polyfluoroalkyl substances (PFAS), to the river. Therefore, it is requested that the Rivers and Estuaries Branch of DBCA is included in the negotiations and collaborations between the City of Belmont, Water Corporation, Department of Water and Environmental Regulation and Department of Planning, Lands and Heritage to redesign Southern Main Drain.	

No.	Submitter		Summary of Submission	Officer Comment
			On principle, DBCA does not support the piping of existing stormwater drains. However, the concept that has been proposed in the draft plan is based on maximizing the retention of mature trees and the provision of an adequate amount and quality of open space for residents and employees of the Redcliffe Activity Centre. It is recommended that the purchase of private lots adjacent to POS 3 to increase the land available for public open space and drainage management be considered, if practical, to determine if piping of the drain under POS 3 is necessary. However, if this approach has been considered and deemed inappropriate, the proposed concept is supported, subject to DBCA's review and approval of the more detailed design to ensure that the pre-development water quality and water quantity entering the Swan River is maintained or improved.	Noted. Refer to discussion under the heading Southern Main Drain in the Officer Comment section of the report.
		61.4	<u>Concluding Comments</u> It is requested that the Redcliffe Station Precinct Design Guidelines are referred to the Rivers and Estuaries Branch of DBCA for review. Additionally, to ensure that existing soil and groundwater contamination is not mobilized via the realignment and redesign of the Southern Main Drain, it is recommendation that background soil and groundwater monitoring is conducted in the locations proposed for the new alignment.	Noted.
62.	Department of Education	62.1	Considers it is imperative to understand the implications of introducing new infill development and residential zones and increased residential densities as they have a correlation with the student enrolment demand.	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		62.2 The number and size of public schools are required to respond accordingly to the anticipated student yield and to be provided at a rate prescribed in the Western Australian Planning Commission's Development Control Policy 2.4 - School Sites (DC Policy 2.4), in particular, 1 public primary school for every 1500 dwellings.	Noted.
		62.3 The Draft RSACP falls within the student local intake area of Redcliffe Primary School (Primary School) with a catchment size of approximately 677 dwellings (415 dwellings outside the RSACP). It is noted that the draft RSACP estimates an ultimate dwelling yield of at least 2550 dwellings within the RSACP alone and thus, resulting an ultimate catchment size in excess of 3000 dwellings. This would attract a minimum of 2 public primary schools.	
		62.4 Currently, the Primary School is operating at a near accommodation capacity. With the limited size of the Primary School site, any additional student yield generated within the RSACP will impose further accommodation pressure on the subject primary school.	
		62.5 Given the extent of the RSACP boundaries and the location of the Primary School, the establishment of a second public primary school site within the RSACP may not be able to achieve a viable student catchment area for both schools.	Noted.
		62.6 Accordingly, the Department recommends that the vacant land adjacent to the Primary School to the east could be reserved for future school use to ensure the structure plan can accommodate the student population growth within the RSACP in lieu of an additional school site. This would require discussion with the landowner - Housing Authority, to come to a mutually agreed position on most appropriate outcome for the State.	This is a matter to be resolved with the Department of Communities who are the landowners of the vacant land adjacent to Redcliffe Primary School.

No.	Submitter	Summary of Submission	Officer Comment
		62.7 With regard to the potential shared use arrangement of the school's playing field for public open space, this will depend on several factors, including but not limited to, the ability to secure more land to allow the future expansion of the Primary School, agreement of management and maintenance obligations and cost sharing. Shared use ovals are generally only considered if the minimum primary school site requirements are met - 3.5ha for the school site and 1.5ha for the oval.	Noted.
		62.8 Any upgrades to the existing road network shall be aligned with the relevant design provisions of DC Policy 2.4 and Liveable Neighbourhoods to provide a safe and convenient access for the students. The Department supports the introduction of traffic calming along local access roads, and maximising the number on-street embayment parking bays adjacent to the school site boundaries to facilitate 'drop-off' and 'pick-up' of students and creating a conducive pedestrian environment to support walking and cycling.	Noted.
		62.9 In relation to built form requirements, the Department has no objection to the proposed low to medium density residential development adjacent to the Primary School. It is expected that the built form shall be at a scale compatible with the Primary School to assist in transition to the surrounding medium to high residential density environment and reducing building bulk and overshadowing onto the streetscape.	Noted.
63.	Department of Fire & Emergency Services	63.1 Given the ACP seeks to coordinate future subdivision, zoning and development of land within Development Area 6, the ACP provides an opportune mechanism for the coordination of bushfire risk to ensure that it does not result in the introduction or intensification of development or land use in an area that has or will, on completion, have an extreme BHL and/or BAL-40 or BAL-FZ.	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		63.2 State Planning Policy 3.7 - Planning in Bushfire Pron Areas (SPP 3.7) seeks to reduce vulnerability to bushfir through the identification and consideration of bushfir risks in decision-making at all stages of the planning an development process.	e 9
		63.3 A Bushfire Management Plan (BMP) is required to accompany strategic planning proposals, subdivision and development applications in areas above BAL-LOW of areas with a bushfire hazard level above low (refer to clause 6.2b). A BMP includes the bushfire assessment identification of the bushfire hazard issues arising from the relevant assessment and a clear demonstration that compliance with the bushfire protection criteria contained within Appendix 4 of these Guidelines, is or can be achieved.	d prepared. Refer to discussion under the heading Bushfire Management in the Officer Comment section of the report.
		63.4 The BMP should be prepared as early as possible in the planning process and progressively refined or reviewer as the level of detail increases. The level of detail provided within a BMP should be commensurate with the applicable planning stage and scale of the proposal of application.	d il e
		63.5 Should you apply SPP 3.7 then, we request the relevant information pursuant to this policy be forwarded to DFE to allow us to review and provide bespoke comment price to the City's endorsement of the ACP.	3

No.	Submitter		Summary of Submission	Officer Comment
64.	Metronet 140 William Street, Perth	64.1	The document makes several references to the WAPC initiating an Improvement Plan (IP) and Improvement Scheme (IS). The City's former Mayor, Chief Executive and senior officers met with the WAPC Chairman in 2019 and it was made clear that the WAPC has no intention of initiating an IP or IS. The Chairman left open the option of a limited IP or IS over the state owned development sites, however, that would be subject to a future decision of state government. The Local Planning Scheme is therefore the implementation mechanism and all references to the WAPC initiating an IP or IS should be removed.	The draft ACP has been modified to address this comment.
		64.2	The document makes multiple references to infrastructure items being funded or delivered by State Government agencies, including realignment of the Southern Main Drain, provision and relocation of services, connection of Second Street to Bulong Avenue, signalisation of Central Avenue and Second Street, etc. The State government has not agreed to fund or deliver any of these items, therefore all references in the document should be removed.	The draft ACP has been modified where appropriate/necessary to address this comment.
		64.3	In Table 35 on page 173 the document makes specific reference to a Local Water Management Strategy (LWMS) being prepared by "Government Agency or Private Developer". The LWMS is not being prepared by a Government Agency and needs to be prepared by the City as proponent for the ACP.	Table 35 on page 173 outlines responsibilities for the implementation of drainage management rather than document preparation as suggested. As the State is likely to form a major landowner within the precinct as a result of the appropriation of redundant Brearley Avenue land, it is reasonable that they, along with other developers in the precinct, would implement the drainage principles provided by the LWMS in undertaking any development.
		64.4	The document should be reviewed to consider the findings of the METRONET draft business case.	The City is not privy to the findings of the METRONET business case.
		64.5	Delete reference to an improvement plan/scheme on pages 1, 4, 5 and 62 as it is not being considered by the WAPC.	The draft ACP has been modified where appropriate/necessary to address this comment.

No.	Submitter		Summary of Submission	Officer Comment
		64.6	Consider amending plan on page 3 to reflect lower building heights as per METRONET business case.	The City is not privy to the findings of the METRONET business case. In any event, the draft ACP includes both minimum and maximum building height requirements ranging between two and four storeys. The minimum requirements are not considered to be unreasonable or prohibitive of development in the area, noting that a minimum two storey building height requirement is successfully applied to higher density development in the wider City of Belmont area.
		64.7	Delete text on page 4 that says Part 1 provides guidance as to the intended investment in the public realm and the movement network to assist stakeholders in understanding the overall vision, on the basis that guidance on funding is not required in Part 1 of the ACP.	The draft ACP is intended to address the implementation of the redevelopment of the precinct, including upgrades to the public realm and movement network. It is therefore considered entirely appropriate for Part 1 of the ACP to provide guidance on the intended investment in the public realm and movement network to assist stakeholders in understanding the overall vision for the area.
		64.8	Delete reference to 'infrastructure investment' in text on page 5 as guidance on funding is not required in Part 1 of the ACP.	Refer to response to comment 64.7 above.
		64.9	Amend Plan 1 (page 7), Figures 47, 75 and 76 (pages 105, 141, 143), Section 4.4.2 (page 142) and Section 4.4.3 (page 144) to remove public open space designation surrounding the station forecourt/plaza as this will be under the management of the PTA. Update all other sections/plans accordingly.	The draft ACP has been modified to address this comment.

No.	Submitter		Summary of Submission	Officer Comment
		64.10	Plan 2 (page 8) and section 2.3.1.7 (page 72) – Confirm the timing for the through connections between Bulong Avenue, Central Avenue and Great Eastern Highway.	The draft ACP identifies that the through-connection of Bulong Avenue and Central Avenue to Great Eastern Highway should only occur when:
				<ul> <li>Great Eastern Highway is widened to six lanes with a solid medium strip in the middle that restricts access to left-in/left- out movements only.</li> </ul>
				Qantas relocates all operations from Terminal 3 at Perth Airport.
				• Further analysis is undertaken by the City and Main Roads WA to determine that the overall function of the road network warrants additional connections to Great Eastern Highway for local traffic movements.
				Until such time that the above occurs, it is not practical to confirm the timing for the through connections as it will be wholly dependent on the timing of Qantas relocating and Main Roads WA upgrading Great Eastern Highway.
		64.11	Plan 2 (page 8) $-$ In terms of the heights along the rail tunnel alignments, note that they may need to be reviewed following the PTA's advice on exclusion zones and load limitations.	The draft ACP recognizes that a Loading and Excavation Assessment will be required for properties located within the rail corridor loading limitation area.
		64.12	Table 1 (page 9) – The minimum height limits for the Centre Transition zone may need to be reviewed following the METRONET business case.	The City is not privy to the findings of the METRONET business case.
		64.13	Table 1 (Page 9) – Minimum site areas for R60 and R100 – Review against the provisions of the R-Codes.	The draft ACP has been modified to align with the minimum site area for the School Interface Sub-Precinct to the R60 requirements of the R-Codes. In terms of the Residential Core and Centre Transition Sub-Precincts, the minimum site area of 80m <sup>2</sup> is proposed to be retained on the basis that the draft Medium Density Housing Code provides this allowance for densities of R100 and above.
		64.14	Table 1 (page 9) – Primary Street setback R60 – Review against the provisions of the R-Codes.	Refer to discussion under the heading Relationship to Residential Design Codes in the Officer Comment section of the report.

No.	Submitter		Summary of Submission	Officer Comment
		64.15	Review entire document to ensure that section numbering is correct.	Noted.
		64.16	Section 1.12 (page 10) – Minimum site area for single house/grouped dwelling $80m^2$ - Review against the provisions of the R-Codes.	Refer to response to comment 64.13 above.
		64.17	Section 1.14 (page 10) – Notes that 'Shops' are not permitted in the Urban Corridor precinct. Review the permissibility of this land use and other uses to ensure that they are consistent with the vision for DA6.	The DA6 Vision Plan does not make mention of retail uses fronting Great Eastern Highway, and in any event it is considered that ribbon retail development in the Urban Corridor precinct would detract from the creation of a Neighbourhood Centre surrounding Redcliffe Train Station.
		64.18	Section 4 and 5 (page 14) – Review the stipulation that subdivision will not be supported unless amalgamation occurs as the implementation of this requirement will be difficult.	Refer to the discussion under the heading Attractiveness and Viability of Redevelopment in the Officer Comment section of the report.
		64.19	Section 5.6.2 (page 17) – Publicly accessible private open space (PAPOS) – Queries whether PAPOS (as described) can be classified as a community benefit given the limited minimum size. Suggests that it be reviewed.	Refer to discussion under the heading Development Bonus Criteria in the Officer Comment section of the report.
		64.20	Section 5.7.1 (page 18) – Street setbacks - Review the street setback requirements against the provisions of the R-Codes.	Refer to response to comment 64.14 above.
		64.21	Section 5.6.2.2 (page 18) – Green star rating for key buildings – Consider including a density bonus for buildings achieving a minimum sustainability rating.	Refer to response to comment 64.19 above.
		64.22	Table 3 (page 19) – Maximum parking – Queries whether maximum parking levels can be reduced given its location adjacent to the train station. Suggests that the requirement be reviewed.	Refer to discussion under the heading Car and Bicycle Parking in the Officer Comment section of the report.

No.	Submitter		Summary of Submission	Officer Comment
		64.23	Section 5.9 (page 19) – Considers that the development requirements identified to be addressed in Design Guidelines should be addressed by the ACP.	Whilst it is acknowledged that reducing layers in the planning framework would be beneficial, it should be noted that the ACP is intended as a transitional document that will ultimately be withdrawn and 'normalized' within LPS 15 and the Design Guidelines (adopted as a local planning policy). The process of normalization will occur once the planning framework has been approved and implemented, and the City is satisfied that the ACP is no longer a necessary element of the planning framework. Given that the Design Guidelines will form as part of the ultimate planning framework, it is considered appropriate for the key requirements of the ACP should be embedded in that document, rather than vice- versa.
		64.24	Section 7.1.2 (page 30) – Remove reference to State Government agencies working with the City of Belmont to design roads within and external to the precinct to reduce the opportunity and desirability for through-movements.	This suggestion is not supported given that the roads flanking the Redcliffe Station Precinct are under the care and control of Main Roads WA and their design is integral to discouraging the opportunity and desirability for through-movements.
		64.25	Section 7.2 (page 31) – Amend text to make specific reference to the new train station and bus interchange.	The draft ACP has been modified to address this comment.
		64.26	Section 7.5 (page 32) – Public Realm – Questions why developers will not be required to make contributions to the upgrade or purchase of public open space.	The draft ACP does not identify any private land that requires acquisition for public open space. All land that is identified for public open space forms as existing Crown reserve.
		64.27	Section 8.1.1 (page 32) – Remove reference to the retention of trees being the 'highest priority' in designing the open space network and the realignment of the Southern Main Drain.	This suggestion is not supported given that the retention of trees the highest priority in the design of the open space network and the realignment of the Southern Main Drain.
		64.28	Section 8.1.7 (page 33) – Remove provision stating that the City will work with the Department of Planning, Lands and Heritage to reappropriate former Brearley Avenue land for open space and drainage purposes.	The land administration process for the reappropriation of the former Brearley Avenue reserve is a process that would need to be undertaken by the Department of Planning, Lands and Heritage.
		64.29	Section 7.7 (page 34) – Amend text to clarify that applications will be referred to the City of Belmont's Design Review Panel 'when required'.	The City's operational practice for its Design Review Panel will require all development applications to be referred to the Panel for review.

No.	Submitter		Summary of Submission	Officer Comment
		64.30	Table 16 (page 70) – Suggest modifying text relating to Brearley Avenue and Redcliffe Train Station from 'decision to close/construct' to 'closure/construction of.'	The draft ACP has been modified to address this comment.
		64.31	Section 2.3.1.8 (pages 74 and 75) and Table 39 (page 189) – Queries whether the proposed signalization of the Central Avenue and Second Street intersection, and the assertion that the need for the upgrade in the short to medium term as a result of traffic volumes generated by the commercial development in the airport estate and the operation of the Redcliffe Train Station, is substantiated through traffic modelling.	Refer to discussion under the heading Second Street and Central Avenue Intersection in the Officer Comment section of the report.
		64.32	Section 2.3.2.1 (page 84) – Update overview of the Forrestfield Airport Link project to reflect its current status.	The draft ACP has been modified to address this comment.
		64.33	Figure 36 (page 85) –	The draft ACP has been modified to address this comment. It should be noted that the PTA has advised that the final timetables
			<ul> <li>Requests that the figure is updated to remove the word 'future' in relation to train stations under construction.</li> </ul>	have not yet been finalized.
			(ii) Queries whether the high frequency bus route has been confirmed by the PTA.	
		64.34	Section 2.4.5 (page 92) – The provision of on-site parking may be impacted by high ground water levels as well as the alignment of the rail tunnels, and therefore underground parking may not be possible or appropriate within certain lots.	Noted.
		64.35	Section 3.4.2 and Table 21 (page 108) – Consider reviewing the projected ultimate dwelling yields.	The dwelling yields referenced in the ACP are based on the minimum residential density requirements in the primary controls table. As such, they represent minimum dwelling yields, rather than 'ultimate' dwelling yields.

No.	Submitter		Summary of Submission	Officer Comment
		64.36	Section 4.1.1.2 (page 118) – In relation to the closure of Brearley Avenue, remove the term "reallocate the redundant Brearley Avenue road reserve" and replace with "redevelop the former Brearley Avenue road reserve"	This suggestion is not supported given that the redundant areas of Brearley Avenue road reserve will be reallocated to either form as public open space, local streets or as development sites. Revising this text to state that the former Brearley Avenue road reserve will be redeveloped suggests that all the land will form entirely as development sites, which is incorrect.
		64.37	Figure 57 (page 123) – Modify notation 2 to recognize that the public open space corridor serves a regional drainage function as is designed to accommodate 1:100 year events.	The draft ACP has been modified to address this comment.
		64.38	Table 24 (page 124) – Remove reference to State Government agencies in the text "The City and State Government agencies will work together to prepare a comprehensive plan for cost effective and timely delivery of the infrastructure required to support redevelopment of the precinct."	It is considered that the implementation of the ACP and delivery of infrastructure will require involvement and collaboration between State Government agencies, and therefore it is considered entirely appropriate that this is recognized in the ACP.
		64.39	Section 4.2.1 (page 126) – Modify text to clarify that at least two lots will generally be required to amalgamate in order to meet the Minimum Development Site Area requirements.	The text already includes commentary that explains that the minimum site area "will generally be achieved through the amalgamation of no more than two existing land parcels" but notes that there will be some situations "where three or even four sites will be required to achieve the minimum site area and frontage requirements." This section of the activity centre plan also includes diagrams illustrating the most common amalgamation scenarios. It is therefore considered that no additional commentary/clarification is required.
		64.40	Sections 4.3.3.2 and 4.4.4.3 (pages 138 and 146) – These sections should recognise that it may be necessary to remove existing mature trees within the former Brearley Avenue road reserve to deliver the urban stream and development of State owned land.	The existing text discusses the importance of tree retention and does not preclude their removal where necessary.
		64.41	Section 4.4.1.1 (page 140) – Amend text from "Utilisation of redundant Brearley Avenue reserve land for open space purposes" to "Utilisation of former Brearley Avenue road reserve for open space purposes."	The Brearley Avenue road reserve still exists so discussing it in the context of it being redundant is logical.

No.	Submitter		Summary of Submission	Officer Comment
		open explo	ion 4.4.1.2 (page 140) – Given the lack of public o space within the precinct, it may be necessary to ore opportunities for acquisition of private land for c open space purposes.	Refer to response to comment 64.26 and discussion under the heading Modified Public Open Space Provision in the Officer Comment section of the report.
		calcu final	e 26 (page 142) – Notes that the public open space ulations may need to be revisited depending on the design of the former Brearley Avenue road reserve urban stream.	Noted.
		that I	ions 4.4.2 and 4.4.4.4 (pages 142 and 146) – Notes POS 5 (Linear Woodland Link) is currently a Primary onal Roads reserve under the Metropolitan Region eme.	The draft ACP has been modified to remove POS 5. Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
			s that the POS designs on pages 148 – 151 are ect to change pending the finalisation of the design.	Noted.
		statir the l base	ion 5.2 and Table 28 (page 158) – Remove text ng that the costs associated with the augmentation of high voltage feeder network is to be determined of on demand and that it is recommended to be ed by Western Power.	Western Power is responsible for the augmentation of the high voltage feeder network to support natural load growth often seen as a result of gradual urban infill development. As such, this text is correct and has not been modified in the draft ACP.
		Corp wate	ion 5.3 (page 160) – Confirm with the Water oration whether they pre-fund the construction of all r mains DN300 and greater and adjust text if essary.	The draft ACP has been modified to address this comment.
		upgra Corp base Corp	ion 5.4 (page 162) – In relation to headworks ades outside of the precinct, confirm with Water oration as to whether the costs are to be determined d on demand and if they are funded by the Water oration's Capital Works Budget. Adjust text if assary.	The draft ACP has been modified to address this comment.

No.	Submitter		Summary of Submission	Officer Comment
		64.49	Section 6.1.3 (page 176) – Queries the need for Design Guidelines given that the ACP contains a range of provisions relating to built form.	Refer to response to comment 64.23 above.
		64.50	Section 6.2.1 (page 180) – The process and responsibilities discussed on the reapprorpriation of State land need to be clarified and confirmed with the Department of Planning, Lands and Heritage. Considers that it is not appropriate to include this level of detail at this stage of the planning process.	The land administration process for the reappropriation of the former Brearley Avenue reserve is a process that would need to be undertaken by the Department of Planning, Lands and Heritage. Given that the ACP should provide clarity on implementation requirements, it is considered appropriate for the process and responsibilities to be outlined by the ACP.
		64.51	Section 6.3.1.5 (page 182) and Table 38 (page 185) – Considers that it is not appropriate for the draft ACP to set out specific costs, roles and responsibilities and timing for the realignment of the Southern Main Drain, and should therefore be removed.	The ACP should establish future direction and implementation requirements for the redevelopment of the precinct. In the absence of this level of detail, it remains unclear how infrastructure works will be delivered in the precinct.
		64.52	Section 6.3.3 and Table 40 (pages 190 – 193) – Review all funding responsibilities and remove Western power as being responsible for the design and delivery of the undergrounding of power line unless it has been agreed by Western Power.	Western Power is the agency responsible for the design and delivery of underground power projects, which can be partly funded and jointly undertaken by local government or developers.
65.	Public Transport Authority PO Box 8125 Perth Business Centre WA 6849	65.1	Redcliffe Station (the Station) is of key interest to the Public Transport Authority (PTA) as the site is one of three stations situated on the forthcoming Forrestfield- Airport Link (FAL). The PTA supports the broad intent of the plan to create a transit-oriented development which supports higher residential densities in the vicinity of the station.	Noted.

No.	Submitter	Summary of Submission	Officer Comment
		65.2 Plan 1 (Page 7) - The PTA notes that the Station plaza is shown as a City of Belmont reservation of Public Oper Space. This error is carried throughout the document ir various plans. This land is part of PTA Controlled Land dedicated by the Public Transport Authority for the purpose of operating and maintaining the railway. The land is being planned and designed as a plaza-style mair thoroughfare for pedestrians to access the Station. This land is not available to the City as a Public Open Space and all references should be removed.	the Station Plaza area as Public Open Space. Refer to discussion under the heading Public Open Space in the Officer Comment section of the report.
		65.3 Plan 2 (Page 8) - The PTA notes the inclusion of the Rai Tunnel Alignment shown on Plan 2, and acknowledges that the City has reflected the requirement for independent loading and excavation assessments to be carried out along the length of the tunnel through the Precinct. The PTA is working closely with the Departmen of Planning Lands and Heritage (DPLH), METRONET the City of Belmont and Hames Sharley to provide clear guidance on the restrictions that the underground infrastructure places on the Precinct, and looks forward to working with the City as plans are developed for the area in conjunction with the future protection of the below-ground railway.	
		65.4 Table 1 (Page 9) - The Building Height Maximums stated and any proposed basement excavation depths, need to be reviewed against the findings of an independen loading and excavation assessment as the site is located within the PTA Protection Zone (above and immediately adjacent to underground tunnel infrastructure). The PTA notes that the City has included a reference to the Loading and Excavation Assessment in section 5.4.3 (Maximum Building Height). The PTA requests that the same reference be included in Table 1.	Loading and Excavation Assessment requirement in Table 1 given that it does not relate to specific precincts and rather applies generally to the area of impact as shown in Plan 2. The potential constraint that the tunnel poses on building height is also identified and discussed in Part 2 of the draft ACP, section 4.1.3.

No.	Submitter		Summary of Submission	Officer Comment
		65.5	Section 6.1 (Page 20) - Centre Sub-Precinct. It is noted that Perth Airport are proposing to develop adjacent land within the Commonwealth land footprint for similar uses and activity. A coordinated approach to development throughout the precinct, across State and Commonwealth land is critical for the intended purposes to be fully realised.	Noted.
		65.6	Figure 9 (Page 21) - The PTA busway and access road, shown from 'Road 2' is not a public access road route. It is PTA access way not a public road, limited to PTA buses, PAPL buses and emergency vehicles only. The plan should be amended to clarify this and avoid setting unrealistic expectations of general vehicular access use.	The draft ACP is not intended to serve as a detailed map illustrating the use of the PTA's land. It is not considered reasonable to assume that the ACP will set unrealistic expectations on the use of the PTA's busway given that it is located within land identified for 'Railways' reserve.
		65.7	Page 40 - The graphic should be updated to reflect the updated naming convention for Redcliffe Station.	The draft ACP has been modified to address this comment.
		65.8	Figure 25 (Page 63) - The graphic should be updated to reflect the revised naming convention for Redcliffe Station.	Refer to response to comment 65.7 above.
		65.9	Section 6.3.2.4 (Page 187) and Table 39 (Page 189) - The proposed upgrade of the intersection to a roundabout at Second Street / Bulong Avenue (Road 3) is not a requirement for Redcliffe Station, nor required by the minor traffic flows generated by the Station development through this area and is not incorporated in to the Forrestfield-Airport Link budget. Should the City wish to connect these two cui-de sacs, all design, feasibility and land requirements this would need to be done as part of the broader development for the area and costs identified accordingly.	The draft ACP does not propose for Road 3 (i.e. the connection of Second Street / Bulong Avenue) to be formed as a roundabout, and simply proposes their connection. Refer to discussion under the heading Bulong Avenue and Second Street Connection in the Officer Comment section of the report.
		65.10	Section 2.3.2.1 (Page 84) - Final timetables and train frequencies on the FAL line have not yet been finalised. Frequencies of one train every 10 minutes stated in the Plan should be caveated as working assumptions only. The PTA reserves its rights to define and amend the timetable and frequency of service on the FAL line.	The draft ACP has been modified to address this comment.

No.	Submitter		Summary of Submission	Officer Comment
		65.11	Section 4.4.4.1 Drainage (Page 146) - the excavation of a re-routed Southern Main Drain as an urban stream will need to be carefully designed and co-ordinated, taking into account the outcomes of independent loading and excavation assessments in the PTA Protection Zone; noting that the tunnels are relatively shallow in the old Brearley Avenue reserve and therefore depths of excavation may be constrained.	Noted.
		65.12	Figure 98 (Page 181) - The figure should be caveated that it is subject to the final land requirements for the initial and future operational and maintenance requirements of Redcliffe Station, which have not yet been concluded by PTA. Any land required by the PTA will be retained as PTA Controlled Land, the balance of the current PTA Construction Site will be reviewed with State and Local Authorities for future ownership and maintenance.	The draft ACP has been modified to address this comment.
66.	Main Roads WA PO Box 6202 East Perth WA 6892	66.1	Main Roads WA (MRWA) supports clause 4.3.1 (page 14) requiring notifications on titles to warn property owners about issues such as vehicle access restrictions and transport noise impacts.	Noted.
		66.2	<u>Great Eastern Highway</u>	
			(i) Regarding local road connectivity to Great Eastern Highway, Main Roads WA has been consulting with City officers regarding an alignment definition study completed earlier this year and a preferred ultimate design concept, based on extensive traffic analysis. Whilst this design process and consultation is continuing, we recommend that the access strategy to the DA6 precinct is not finalized to avoid adopting a strategy that might be different to the connectivity that will be permitted to/from Great Eastern Highway	In order to progress the draft ACP and overall planning for the precinct, it is necessary to be informed by and include an assessment of the proposed transport network. Unfortunately, in the absence of design work for Great Eastern Highway being completed by Main Roads WA, it is not possible to incorporate any analysis that may have been undertaken given that it is not finalized and subject to change. In addition, it is not considered appropriate to delay the progression of planning for the precinct on this basis. Notwithstanding, it should be noted that the draft ACP recognizes that Great Eastern Highway will be subject to a future upgrade which may alter existing access arrangements in the precinct.

No.	Submitter			Summary of Submission	Officer Comment
			(ii)	In relation to the proposed built form setbacks along Great Eastern Highway, Main Roads do not support any encroachment into the Primary Regional Roads reserve.	Noted.
		66.3	<u>Activity</u>	<u>Centre Plan</u>	
			(i)	Part 1.24 Vehicle Parking and Access (page 19) of the ACP should include reference to future road widening of Great Eastern Highway, and that land from a number of properties along Great Eastern Highway will need to be ceded and/or set aside to facilitate that road widening.	The draft ACP has been modified to recognize that some existing lots fronting Great Eastern Highway are affected by the MRS Primary Regional Roads reservation and may be required to cede land for widening.
			(ii)	The Urban Corridor Precinct Objective 6.5.2 b) to restrict direct access to/from Great Eastern Highway and instead require it to be achieved from side streets and rear laneways is supported. This is consistent with the objectives of WAPC Development Control Policy 5.1 Regional Roads (Vehicular Access), Main Roads Driveways Policy and access planning for Great Eastern Highway.	Noted.
			(iii)	The words 'efficient access' in Key Action 7.1.1 Access/Egress to the Regional Road Network (page 30) should be replaced with 'appropriate access' because it is a priority that the regional road network carrying the significantly greater volume of traffic operates more efficiently that local street access/egress.	The draft ACP has been modified to address this comment.
			(iv)	The reference to Tonkin Highway in Key Action 7.1.1 Access / Egress to the Regional Road Network (page 30) should be removed because direct vehicle access between Tonkin Highway and DA6 will not be permitted.	The draft ACP has been modified to address this comment.

No.	Submitter		Summary of Submission	Officer Comment
		(v)	Key Action 7.1.1 b) regarding facilitating u-turn movements for heavy vehicles on Great Eastern Highway at Coolgardie Avenue is not supported. It is not geometrically viable for heavy vehicles to perform such a movement at the intersection and the operation of that intersection is subject to review as part of Main Roads corridor planning.	The draft ACP has been modified to remove reference to 'large' vehicles, given that the existing u-turn movements on Great Eastern Highway, at its intersection with Coolgardie Avenue, provide access to businesses fronting Great Eastern Highway.
		66.4 <u>Trans</u>	sport Assessment	
		(i)	The Transport Assessment by Flyt Transport Consultancy may need to be revised once Main Roads has finalised planning for Great Eastern Highway and resolved connectivity to/from side roads. It is possible that there will be inconsistencies between the network access assumptions on which the Transport Assessment was based and Main Roads access planning to Great Eastern Highway.	Noted.
		(ii)	Main Roads cannot comment on the reliability of Flyt's traffic model because it was not able to be reviewed. That modelling was done using SATURN which is not a common modelling platform in WA and is not compatible with Main Roads systems. Supported traffic modelling software includes LinSig, SIDRA, and Vissim/Aimsun, as noted in the Operational Modelling Guidelines available on our website.	The Transport Impact Assessment undertaken by Flyt has been informed by the modelling previously undertaken by the Public Transport Authority to support the construction of the Redcliffe Train Station. The use of previous modelling ensures consistency with previously endorsed assessments undertaken over the precinct. SATURN is a legitimate form of modelling software and no reason exists for it not to be used, particularly given that it has been used previously by the State to justify the construction of the Redcliffe Train Station. The model was developed prior to the release of any guidelines from MRWA on preferred modelling packages, and is specific to intersection configurations. At this stage of the process, it would be unreasonable to expect an entirely new model to be developed simply to suit MRWA's internal technical assessment capabilities.

No.	Submitter			Summary of Submission	Officer Comment
			(iii)	The traffic modelling for the ACP should be peer reviewed, as recommended in the Department of Transport's Transport Modelling Guidelines for Activity Centre structure plans.	<ul> <li>In addition to the Transport Impact Assessment undertaken by Flyt to inform the draft ACP, there has been a substantial amount of analysis already undertaken for the Redcliffe Station Precinct and surrounding land, including: <ul> <li>The DA6 Vision Plan and Implementation Strategy and Movement Network Strategy;</li> <li>The Forrestfield Airport Link Project;</li> <li>The Perth Airport Master Plan and Major Development Plans; and</li> <li>The Gateway WA project.</li> </ul> </li> <li>A peer review of the modelling is not considered necessary based on the scale of the precinct and the swathe of modelling that has already been undertaken over this area.</li> </ul>
			(iv)	The proposed installation of traffic signals at the Central Avenue/Second Street intersection is unlikely to be approved by Main Roads. It is recommended that he proposal be reconsidered, with reference to Main Roads 'Roads and Traffic Signals – Guidelines for the selection of intersection control' because a roundabout is the preferred treatment for an intersection of local roads.	Refer to discussion under the heading Second Street and Central Avenue Intersection in the Officer Comment section of the report.
			(v)	The use of regulatory (i.e. stop or give-way) intersection control on any road within DA6 is subject to review and approval of Main Roads.	Noted.
		66.5	<u>Urban</u>	Forest Strategy	
			(i)	Main Roads should be consulted about any tree planting proposed in the Great Eastern Highway road reserve to ensure that adequate clearances are maintained to traffic signs and traffic signals, so that those assets remain visible to road users.	Noted.

No.	Submitter	Summary of Submission	Officer Comment	
		<ul> <li>(ii) The City must obtain approval from Main Roads before any works are undertaken within the Great Eastern Highway road reserve.</li> </ul>	Noted.	
67.	Department of Transport 140 William Street	67.1 The Department supports the activity centre plan.	Noted.	
	Perth WA 6000	67.2 <u>Cycle Network</u>		
		The activity centre plan refers to Bike West bike routes which are out of date. The document will need to be updated with the City of Belmont's Long-Term Cycle Network which was endorsed in the 23 June 2020 Council Meeting.		
		The Key Design Considerations of each street type states that Type A roads prioritise car movements, and Type B roads prioritise bus movements. Cross sections of Street A and B indicate that bike lanes are unprotected. The Department doesn't suppor unprotected bike-lanes and recommends these be protected.	l s e t	
		The on-road cycle lane widths should be a minimum o 1.8m with a 500mm barrier between the cycle lane and the traffic lane. Where bicycle lanes traverse on-stree parking, they should be aligned in between the on-stree parking and adjacent paths.	l t	
		Shared paths providing direct access to Redcliffe Station and the principle shared path network should be a minimum of 3m in width and the remaining shared paths should be a minimum of 2.5m wide.		
		Priority for cyclists should be provided for driveway crossovers and intersections in-keeping with the Long Term Cycle Network. Key access points for pedestrians should facilitate pedestrian priority particularly in relation to direct access to and from the station.		

No.	Submitter	Summary of Submission	Officer Comment
		To improve pedestrian safety and connectivity, existing footpaths need to be maintained/upgraded where defects have emerged. High-quality pedestrian infrastructure should be provided on both sides of the street and at al signalized crossing points.	
		67.3 <u>Parking</u>	
		Priority of on-street parking has been identified as short stay (timed) parking (section 2.4.2). Priority should also be noted for loading, ACROD, motorcycle and electric vehicle recharging bays.	
		To support the Plan's overall objectives of "improved connectivity" (page 39) and address the identified connectivity weakness/issue of long blocks, granting o bonus building height or plot ratio for General Community Benefit should include consideration of quality mid-block pedestrian access for longer blocks (General Community Benefit examples set out in section 4.2.7.2).	undertaken and found that the provision of mid-block pedestrian accessways would result in a very small reduction in travel time for a handful of residents seeking access to Redcliffe Train Station and/or areas of public open space. In addition, an onerous
		Consideration should be given to commercial and retail to increasing the minimum bicycle parking requirements for building tenants and including minimum requirements or lockers (at least 2.5x the number of bicycle bays) and showers, and to require the provision of (public) visitor bicycle parking.	
		67.4 Public Transport	
		The proposed bus network review to address greated direct connectivity between this Precinct and the Belmon Town Centre, suburbs of Cloverdale and Redcliffe and the Kewdale Industrial Area are noted and supported.	
		Kiss and Drive of at least 25 bays for the station is supported, to cater for ongoing increasing use of last mile ride share options.	

No.	Submitter	Summary of Submission	Officer Comment
		5,	Noted, however this is not relevant to consideration of the draft ACP and rather relates to the Public Transport Authority's Forrestfield Airport Link project.