

Summary of Submissions:

The tables below summarise the comments received during the advertising period of the proposal, together with the Administration's response to each comment.

Comments Received in Support:	Administration Comment
<p><u>General</u></p> <ul style="list-style-type: none"> • The redevelopment of the Charles Hotel is much needed and would improve the amenity of the area. • The proposal would provide a focal point for the community through the provision of public open space and various uses and services. • The existing Charles Hotel is an underutilised eyesore and attracts anti-social behaviour to the area and redevelopment would assist in deterring this. • Where possible the existing Charles Hotel building should be retained and incorporated into any redevelopment of the site. 	<ul style="list-style-type: none"> • The comments in support are noted. • The LDP does not propose for the existing building to be retained. It is noted that this is not the subject of any heritage listing that would prevent its demolition.
<p><u>Building Height</u></p> <ul style="list-style-type: none"> • The proposed building heights would be reasonable for an inner-city location on an arterial road, and the six and eight storey portions are appropriately separated from existing lower scale development. 	<ul style="list-style-type: none"> • The comment in support is noted.
<p><u>Setbacks</u></p> <ul style="list-style-type: none"> • The proposed upper level setbacks would assist to ensure that the building massing is appropriate for the context. • The building setbacks on Development Parcels 1 and 2 should maximise the ability for the retention of mature trees on site. 	<ul style="list-style-type: none"> • The comment in support is noted. • The proposed setbacks to Development Parcels 1 and 2 would provide for an opportunity for some existing trees to be maintained, although this would be subject to confirmation of the exact location through a site survey that would accompany a future DA. The LDP provides for an objective that encourages the retention of significant vegetation across the subject site. The removal of any mature trees would need to have regard to the relevant element objectives of the R Codes Volume 2 and be supported by an arborist report.
<p><u>Landscaping</u></p> <ul style="list-style-type: none"> • The proposed landscaped areas would assist to mitigate bulk and scale impacts and to reduce over-development of the site. • The future development should provide as many trees as possible to reduce the urban heat island effect and improve the pedestrian 	<ul style="list-style-type: none"> • The comment in support is noted. • Any future DA would need to provide for on-site landscaping and tree planting in accordance with the relevant element objectives of the R

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environment to Charles Street.	Codes Volume 2.
<u>Building Design</u> <ul style="list-style-type: none"> The future development should provide for awnings to Charles Street to improve pedestrian amenity. 	<ul style="list-style-type: none"> Any future DA would need to provide for pedestrian awnings to Charles Street in accordance with the City's Built Form Policy.

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<u>LDP Purpose and Intent</u> <ul style="list-style-type: none"> The LDP is extremely broad and lacks clarity on what is proposed and does not commit to the provision of any community benefits. Further clarity is required to provide certainty to the community on the ultimate development outcome. The proposed LDP is premature as there is no City strategy which identifies the sites as a centre of any scale. The proposal is to be considered in the context of broader activity centres. 	<ul style="list-style-type: none"> The WAPC's Framework for Local Development Plans document sets out that the purpose of a LDP is to coordinate development outcomes of a particular site, and is to generally address matters including vehicle access and building envelopes. The proposed LDP is consistent with this and would guide the future redevelopment of the subject site into a mixed use precinct commercial, residential and hotel precinct as outlined in its objective. There is no requirement for the LDP to include any community benefit standards. The City's Local Planning Strategy identifies the subject site as a strategic development site outside of the North Perth Town Centre that could accommodate greater development potential. The LDP would be consistent with this to provide for a mixed use development that provides an opportunity for a mix of dwelling types and compatible non-residential uses. <p>The subject site is not within an activity centre and would be generally consistent with the provisions of 'out of centre' developments in accordance with SPP 4.2. The preferred land uses are consistent with those that are currently permissible under LPS2 and do not introduce new uses into the precinct. The subject site is highly accessible by public transport including high frequency bus routes. The subject site would be serviced by existing medium to high density residential development within a 400 metre catchment of the subject site identified along Charles Street.</p> <p>Any future DA would need to be considered against the provisions of SPP 4.2 and demonstrate that there would be no impacts on nearby centres once the final mix and floor area of land uses has been identified.</p>
<u>Land Use</u>	

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<ul style="list-style-type: none"> • There is enough Shops, Restaurant/Cafes, Medical Centres, Aged or Dependent Person’s Dwellings and Liquor Stores located in the area and would be no need for any more. • The proposed land uses are wide ranging and could potentially result in the creation of a new commercial/retail centre that is not required given the proximity to other centres at Dog Swamp, Mount Hawthorn in addition to smaller facilities at the intersection of Scarborough Beach Road and Charles Street and along Fitzgerald Street. • The proposed land uses are too broad and should be refined so the community can better understand the possible impacts of such activities occurring. 	<ul style="list-style-type: none"> • There are no restrictions on the number or proximity of these types of land uses under LPS2. Proliferation of uses is not a valid planning consideration. • The proposed preferred land uses identified in the LDP are all land uses that are currently capable of approval on the subject site under LPS2. Any future DA would need demonstrate that there would be no impacts on nearby centres once the final mix and floor area of land uses has been identified. • The LDP identifies preferred uses, but there are a range of land uses that could be contemplated on the site under LPS2. The preferred uses would still be required to be assessed as part of any future DA to demonstrate that they would be consistent with the respective zone objectives of LPS2, any applicable local planning policies, and relevant due regard matters of Clause 67 of the LPS Regulations. These would include compatibility of uses, impacts on amenity, and the impact of additional traffic, noise and car parking which would be informed by the final mix of land uses and specific operational matters of uses/tenancies.
<p><u>Density</u></p> <p><i>General</i></p> <ul style="list-style-type: none"> • There is enough apartments located in the area and would be no need for any more. • The proposed lack of plot ratio controls would be inconsistent with the R Codes Volume 2. • There is already enough Child Care Premises in the area. 	<ul style="list-style-type: none"> • The State Government’s overarching targets seek for the City to accommodate an additional 11,500 dwellings within its district by 2050. The City’s Local Planning Strategy identifies for density to be located along urban corridors such as Charles Street as well as within town centres. The provision of apartments would also be consistent with the objectives of both the Residential and Mixed Use zones which seek to provide a mix of housing options. • The LDP proposes to vary the R Codes acceptable outcomes to not have a plot ratio control. This is consistent with the element objectives of the R Codes Volumes 2 because the LDP would provide for a building envelope that is managed by street and boundary setbacks and building heights which responds to the future scale of development along Charles Street. • There are no restrictions on the number or proximity of these types of land uses under LPS2. Proliferation of uses is not a valid planning

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<ul style="list-style-type: none"> The proposed increase in the population as a result of the development has not been identified and would increase demands on surrounding schools and public open space. <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> The proposed Shop and Liquor Store – Small on Development Parcels 2 and 4 would not be consistent with the existing uses of the site. These would be better to be consolidated with the Hotel on Development Parcel 3 where it could be located with other similar uses. 	<p>consideration.</p> <ul style="list-style-type: none"> The LDP would enable redevelopment that would accommodate new residents into the area that would assist to support existing businesses to respond to market demands in the future. The Department of Education would be responsible for ensuring that there is adequate capacity within existing government schools within the catchment area of the subject site. The LDP proposes the provision of publicly accessible areas that could be used by the community. The adequacy of the provision of POS consistent with the WAPC’s POS Policy would be considered at the future DA and subdivision stages. <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> Liquor Store – Small is a land use that is currently permissible on each of the Development Parcels under LPS2. The preferred uses of the LDP identify this use on Development Parcels 1, 2 and 4, with the final location to be identified as part of a future DA. This would not prevent Liquor Store – Small being proposed on Development Parcel 3.
<p><u>Building Height</u></p> <p><i>General</i></p> <ul style="list-style-type: none"> The proposed building heights would be out of scale with the existing character of the area which is predominantly two storeys. <ul style="list-style-type: none"> The proposed building heights would be inconsistent with the City’s Built Form Policy and the R Codes Volume 2. 	<p><i>General</i></p> <ul style="list-style-type: none"> While existing buildings in the area are generally between one and two storeys, the City’s Built Form Policy identifies a height standard of up to four storeys on portions of the subject site and along Charles Street, and between two and three storeys along Eton, Ellesmere and Carrington Streets. The proposed building heights would not be out of scale with the desired future scale that is identified by the Local Planning Strategy. The tallest portions, being 6 and 8 storeys would be located centrally within the subject site along Ellesmere Street, with building heights transitioning down to be consistent with the current Built Form Policy height standards where there is an interface with residential properties to the north, south and west. The proposed building heights would be consistent with the element objectives of the R Codes by locating the tallest portions centrally within the site and then stepping down to be consistent with the existing Built Form Policy heights to achieve a suitable transition to surrounding residential properties. This moderation of building height across the subject site as well as the use of upper level setbacks would assist to

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<ul style="list-style-type: none"> • The proposed building heights would impact on the visual privacy and access to sunlight for surrounding residents. The extent of overlooking and overshadowing from the proposed development has not been demonstrated by the applicant. • The proposed building heights does not adequately respond to the context of Charles Street or transition to the existing residential dwellings. • The proposed building heights would restrict views of the City. <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> • The proposed height six storey height of Development Parcels 1, 4 and 5 would be out of scale with the existing locality 	<p>mitigate impacts from building bulk and scale.</p> <ul style="list-style-type: none"> • Any future DA would need to demonstrate consistency with the relevant element objectives of the R Codes Volume 2 in relation to overshadowing and visual privacy. The moderation of building height across the subject site and use of setbacks would assist to reduce impacts from overshadowing on the immediately adjoining properties at No's. 110 and 112 Eton Street and No. 6 Carrington Street. • The tallest portion of building height are located centrally within the site and step down to be consistent with the current Built Form Policy height standards at the boundary to ensure that an appropriate transition is achieved to residential properties. The LDP provides for upper level setbacks to ensure that when viewed from Charles Street the maximum height would generally appear as five storeys When viewed further away the storeys above would be articulated through major openings, balconies and facade treatments to reduce the visual impact consistent with the R Codes Volume 2 and the vision identified by the Local Planning Strategy. • The R Codes Volume 2 does not provide for views of significance as a relevant planning consideration related to building height. The LDP provides for building heights to be varied and modulated across the subject site. This would not disproportionately views across the subject site from the surrounding area, and would provide for a greater scale of development that aligns with the aspirations of the City's Local Planning Strategy. <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> • The LDP provides for upper level setbacks to Development Parcels 1, and 5 to ensure that when viewed from Charles Street the maximum height would generally appear as 5 storeys. The additional storeys would need be appropriately treated and articulated to reduce the visual impact on the broader consistent with the R Codes Volume 2. Similarly the six storey portion of Development Parcel 4 would be setback up to 34 metres from the boundary to reduce the visibility and impact of the additional height. The proposed building height would provide for a greater scale of development that aligns with the aspirations of the City's Local Planning Strategy.

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<ul style="list-style-type: none"> • The proposed four storey height of Development Parcel 2 would be inconsistent with the residential streetscape and should be between two and four storeys. • The proposed eight storey height of Development Parcel 3 would be out of character with existing development along Charles Street, and would result in overshadowing to the properties to the east of Charles Street and on the corner of Carrington and Eton Street as well as overlooking. 	<ul style="list-style-type: none"> • The 4 storey portion is located to Ellesmere Street with the building height stepping down to two storeys adjacent to the adjoining property. This is consistent with the existing Built Form Policy standard and ensures that an appropriate transition is achieved to lower scale development. • The LDP provides for upper level setbacks to Development Parcel 3 to ensure that when viewed from Charles Street the maximum height would generally appear as 5 storeys, with floors above to be articulated consistent with the R Codes Volume 2 to reduce the visual impact on the surrounding area. <p>The R Codes Volume 2 assesses overshadowing a midday on 30 June when the shadow would be cast to the south, and any future DA would need to demonstrate that adequate access to sunlight and visual privacy is provided to surrounding properties.</p> <p>The eight storey portion would be located approximately 25 metres from properties on the eastern side of Charles Street, 80 metres from properties on the western side of Charles Street, and 60 metres from properties on the southern side of Carrington Street. This separation would assist to mitigate impacts from overlooking and overshadowing.</p>
<p><u>Setbacks</u></p> <p><i>General</i></p> <ul style="list-style-type: none"> • The proposed setbacks would be insufficient to offset impacts on adjoining properties. • The proposed setbacks would be inconsistent with the City's Built Form Policy and the R Codes Volume 2. • The proposed setbacks to Ellesmere Street is out of keeping with the existing character and would be imposing on the streetscape. 	<p><i>General</i></p> <ul style="list-style-type: none"> • The proposed setbacks of the LDP would generally be consistent with or exceed the current standards to the Built Form Policy to mitigate impacts from building bulk and scale. The exception to this is the lower levels of Development Parcels 1 and 2 to the north, and all levels of Development Parcel 6 to the west which propose departures to the Built Form Policy. In these instances landscaping is proposed within the 3 metre setback area to assist with reducing the impact of building bulk. • As set out above, the proposed setbacks are generally consistent with or larger than the current Built Form Policy standards. The proposed setbacks assist to provide a suitable transition to surrounding properties and are consistent with the element objectives of the R Codes Volume 2. • The proposed nil setbacks to Ellesmere Street would provide the opportunity for ground floor tenancies with active frontages. This would

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<p><i>Development Parcels</i></p> <ul style="list-style-type: none"> The proposed street setbacks to Development Parcel 2 are inconsistent with the established residential streetscape of Eton Street 	<p>provide for a clear transition between the public and private realm and would support the provision of surveillance from adjacent tenancies consistent with the element objectives of the R Codes Volume 2.</p> <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> The LDP proposes a 9.2 metre setback to Eton Street for the majority of the frontage, reducing to a nil setback at the corner of Ellesmere Street. This setback would be consistent with the standards of the Built Form Policy and would provide for a suitable transition from the existing residential development to the north that is characterised by street setbacks which vary between 8.5 metres and 11 metres.
<p><u>Vehicle Access</u></p> <p><i>General</i></p> <ul style="list-style-type: none"> No vehicle access is provided from Charles Street which would have a greater impact on the surrounding residential area. There are existing access points available from Charles Street and these should be utilised along with Ellesmere Street to reduce the impacts on the surrounding streets. <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> Eton Street access points to Development Parcels 2 and 3-6 would be too close to the intersection with Ellesmere Street which has had a number of accidents, and would have reduced visibility due to the topography of the road. 	<p><i>General</i></p> <ul style="list-style-type: none"> Vehicle access from Charles Street would be inconsistent with Development Control Policy 5.1 – Regional Roads (Vehicle Access) which seeks to rationalise existing access points and not provide for new access points to provide for efficient traffic movement along regional roads. <p>The proposed access points from Eton Street would be consistent with the MRWA road hierarchy and the City's Accessible City Strategy which identifies for lower order roads such as Eton Street to be used to provide access to abutting properties. Under this hierarchy Ellesmere Street is a higher order used to carry traffic between residential areas and distributor roads like Charles Street.</p> <p><i>Development Parcels</i></p> <ul style="list-style-type: none"> The access points to Development Parcels 2 and 3-6 would be setback approximately 20 metres and 35 metres from the intersection with Ellesmere Street. This would provide adequate separation to ensure that vehicle and pedestrian movement is safe in conjunction with recent reduced speed limits of 40km/h.
<p><u>Car Parking</u></p> <ul style="list-style-type: none"> The development should provide for adequate on-site car parking for the residential and non-residential uses to reduce the demand for on-street parking on surrounding streets. 	<ul style="list-style-type: none"> A future DA would need to demonstrate that adequate on-site car parking is provided to meet the needs of any redevelopment in accordance with the relevant element objectives of the R Codes Volume 2 and the City's Non-Residential Development Parking Policy.
<p><u>Traffic</u></p>	

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<ul style="list-style-type: none"> • The traffic demands of the future development have not been considered in the LDP. The development would result in increased traffic into the residential area and around Ellesmere Park and impact on the safety of pedestrians. • The development would increase existing traffic congestion along Charles Street and result in additional rat running through the surrounding residential streets. • The increased traffic from Ellesmere Street and Carrington Street would not be able to safely access Charles Street given the existing levels of congestion. • As a result of increased traffic, the northern portion of Eton Street should be modified to be a cul-de-sac to encourage vehicles to utilise Carrington Street to access Charles Street. • Child Care Premises have particular impacts during peak pick up and drop off periods, and would exacerbate existing traffic and parking issues. 	<ul style="list-style-type: none"> • Following community consultation, the applicant provided a TIA to consider the impact of additional traffic movements in the area. The TIA found that the additional 227 vehicles in the peak hour would be within the existing capacity of the road network and would not impact on the amenity or safety of the area. It is also noted that any future DA would need to be supported by a further traffic assessment that responds to the redevelopment proposal including the exact number of dwellings and types of land uses proposed. • The TIA identified that additional vehicle movements along Charles Street would be within its overall capacity and would not be expected to impact on the safety or functionality for vehicles. <p>The additional traffic would be within the capacity of surrounding roads and would and would not be expected to have a significant impact on the residential area. Traffic would dissipate through the road network and would not impact on the performance of intersections within the residential area to the west of the subject site. The City would continue to monitor impacts on surrounding intersections to determine if future local area traffic management measures are required.</p> • The TIA identifies that 110 of the peak hour trips would access Charles Street across the intersections with Ellesmere Street and Carrington Street. The TIA did not raise any safety issues regarding the increased usage, noting that of the 15 crashes that occurred on Charles Street between 2018 and 2022 there were no fatalities and the primary cause was related to driver behaviour rather than road design. • The City would continue to monitor impacts on surrounding intersections to determine if future local area traffic management measures are required. • A future DA would need to consider the traffic impacts result from a Child Care Premises should it be proposed, which would be informed by greater detail as to the number of children, staff, and operating hours.
<p><u>Landscaping</u></p> <ul style="list-style-type: none"> • The proposed LDP does not identify for the retention of any existing tree 	<ul style="list-style-type: none"> • The LDP provides for an objective that encourages the retention of

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<p>canopy on the site which would be consistent with the City's policies and assist to mitigate bulk and scale impacts of the future building.</p>	<p>significant vegetation across the subject site. The removal of any mature trees would need to have regard to the relevant element objectives of the R Codes Volume 2 and be supported by an arborist report. Any future DA would also need to provide for on-site landscaping and tree planting in accordance with the relevant element objectives of the R Codes Volume 2 that would assist to mitigate building bulk and scale.</p>
<p><u>Noise</u></p> <ul style="list-style-type: none"> The increased number of residents would result in an increase of noise to the area. 	<ul style="list-style-type: none"> Any future DA would need to be accompanied by an acoustic report that includes an assessment of noise generated by the development and any attenuation or management measures required to meet the assigned levels of the <i>Environmental Protection (Noise) Regulations 1997</i>.
<p><u>Other</u></p> <ul style="list-style-type: none"> The proposal would impact on property values. The intended construction timeframe and impacts to surrounding residents would need to be managed. 	<ul style="list-style-type: none"> Property values are not a relevant planning consideration. The applicant has not provided any indicative timeframe for when a DA for the redevelopment of the subject site would be lodged once an LDP is approved. Any future construction activities would be supported by a Construction Management Plan in accordance with the City's Policy No. 7.5.23 – Construction Management Plans that would outline measures to ensure that works are undertaken with minimal impact on surrounding residents.
Comments Received Expressing Concern:	Administration Comment
<p><u>Building Height</u></p> <ul style="list-style-type: none"> The proposed building heights are out of scale with the existing area and should be reduced to better reflect this. The proposed building heights would result in a loss of visual privacy for the surrounding properties. 	<ul style="list-style-type: none"> The proposed building heights would be consistent with the element objectives of the R Codes by locating the tallest portions centrally within the site and then stepping down to be consistent with the existing Built Form Policy heights to achieve a suitable transition to surrounding residential properties. This moderation of building height across the subject site as well as the use of upper level setbacks would assist to mitigate impacts from building bulk and scale. Any future DA would need to demonstrate consistency with the relevant element objectives of the R Codes Volume 2 in relation to overshadowing and visual privacy. The moderation of building height across the subject site and use of setbacks would assist to reduce impacts from

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<p><u>Setbacks</u></p> <ul style="list-style-type: none"> Greater side setbacks should be provided to enable greater canopy coverage to be achieved on the site. 	<p>overshadowing and overlooking.</p> <ul style="list-style-type: none"> The proposed setbacks to Development Parcels 1 and 2 would provide for an opportunity for some existing trees to be maintained, although this would be subject to confirmation of the exact location through a site survey that would accompany a future DA. Any future DA would need to provide for on-site landscaping and tree planting in accordance with the relevant element objectives of the R Codes Volume 2.
<p><u>Vehicle Access</u></p> <ul style="list-style-type: none"> Access to the site would be better provided from Charles Street via a slip lane and could be constructed during the future widening works. Access to underground parking should be provided directly from the street to maximise opportunities for green canopy across the site. 	<p><u>Vehicle Access</u></p> <ul style="list-style-type: none"> Access from Charles Street would be inconsistent with DC 5.1 which seeks to rationalise and remove access points from regional roads. The LDP proposed to consolidate access to Development Parcels 3-6 to be from one crossover and an internal road than by a number of separate crossovers. This maximises opportunities for verge planting to improve the public realm.
<p><u>Car Parking</u></p> <ul style="list-style-type: none"> There would be the potential for increased demand for on-street parking on the surrounding residential streets. Adequate parking should be provided to cater to the demands of a future development. 	<ul style="list-style-type: none"> Any future DA would need to demonstrate that adequate on-site car parking is provided to reduce impacts on existing on-street parking.
<p><u>Traffic</u></p> <ul style="list-style-type: none"> Increased traffic in the area would result from the proposed development, including along Eton Street and Ellesmere Street and would impact on the safety of this intersection. 	<ul style="list-style-type: none"> The applicant's TIA has identified that the additional vehicle movements would be within the capacity of the surrounding road network and would not be expected to impact on vehicle or pedestrian safety. The City will also continue monitoring the Ellesmere and Carrington Street intersections with Eton Street to determine if local area traffic management measures are required.
<p><u>Landscaping</u></p> <ul style="list-style-type: none"> The future development should be required to have a condition of approval to provide mature trees which can reach a height at maturity that is equivalent to the height of the buildings to add more green canopy to the area. 	<ul style="list-style-type: none"> Any future DA would need to be supported by a detailed landscaping plan in accordance with the LDP. This would need to provide details on proposed tree species including their height at maturity. A condition would be imposed for landscaping and trees to be implemented in accordance with an approved landscaping plan through a future DA.

Note: Submissions are considered and assessed by issue rather than by individual submitter.