

Hon. Rita Saffioti
Minister for Planning
9th Floor, Dumas House
2 Havelock Street
WEST PERTH WA 6005

Rochelle Lavery
Acting Chief Executive Officer
City of Subiaco
241 Rokeby Road
SUBIACO WA 6008

Dear Minister Saffioti and ACEO Lavery

RE: OBJECTION to City of Subiaco Draft Local Planning Strategy (LPS) and Draft Local Planning Scheme 5 (LPS5)

I am the owner of 2 Duke Street Subiaco, and have lived and/or worked in Subiaco for 30 years. I was born at King Edward Memorial Hospital and lived my first months in Subiaco, in a small worker's cottage on Bagot Road which my then recently immigrated parents rented, upon which the site of Crossways Shopping centre is now located. For over 18 years, I have run my design practice in Subiaco, now with my husband as well, either in commercial premises or from our home studio. We love Subiaco, we have seen it rise to its hey days in the late 80's and through the 90's and early 2000's and have watched its decline, caused in part by bad planning and decisions. Subiaco can ill afford any more especially of the scale such as proposed in the Draft LPS and LPS5.

The changes to the City's local planning scheme as proposed in the current draft version of LPS5, directly impact our house, which is adjacent to the laneway behind the section of Rokeby Road South that is slated to be rezoned to "Mixed Use R80". We live in a single storey cottage in a heritage listed cul de sac street of only 10 houses.

I love living in Duke Street and all residents of this small, unique cul-de-sac take great pride in their houses and gardens and are proud to support the Conservation status of the street and the local neighbourhoods shops and services. We live together harmoniously and feel very fortunate to be custodians of such a great area. I think this is the general view and feeling for a great many residents living in the character neighbourhoods of Subiaco, Shenton Park and Daglish - a great number of whom now also find themselves in the firing line for the major rezoning changes proposed in Draft LPS and LPS5.

I have recorded some of the reasons below for my strong objection to LPS and LPS5 with references. Both documents undermine the very objectives of this City's strategic direction, its vision and mission.

SOME COMMENTS REGARDING DRAFT LOCAL PLANNING STRATEGY - PART 1

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“ Executive Summary

It is recognised that a portion of these additional future dwellings would be located in the suburb of Crawley, formerly areas within the City of Subiaco that are now within the City of Perth, however the Western Australian Planning Commission (WAPC) has yet to release an update to the CSRPF with revised targets.”

Why is there a need for a revision of the City's LPS BEFORE the update to the CSRPF with revised targets? It would be far more sensible to delay/request extensions for the release of the LPS until after this was done, given the extenuating circumstances applicable to the City of Subiaco, to allow planning to proceed in an orderly fashion and ascertain dwelling targets more accurately.

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“Targets population growth in new strategic areas, while maintaining the residential character throughout.”

How can the residential character be maintained throughout with rezonings going from R20 to R60, R80, R100 etc?? This statement seems wholly untrue as it is impossible, given these circumstances.

“Supports new development to be of a high quality design, providing benefits to the community, contribute to addressing transport pressures and improving greenery, and to be of a suitable form and scale as outlined in the Activity Centre Plans;”

Does not detail the assertion that these changes will be of benefit to the community. Further, how can these multistorey buildings be constructed to meet the rezonings AND IMPROVE greenery? So all the new buildings will have vertical gardens all over them? Or they will have huge back and front yards and internal courtyards, to result in an overall improvement in greenery as compared to what was present on the lot before? How is the improvement assured?

“Strikes a balance between development, character and heritage across the City with appropriate outcomes for specific areas.”

How can a balance be achieved when over 50% of the character/heritage homes in Daglish, Shenton Park and Subiaco South are slated for rezoning. And one must assume in this exercise that all homes rezoned will be redeveloped in time or there is no point to the calculations and the plan, regardless of whether they are or not.

“High level of permissibility in the planning scheme and associated policies for appropriate new businesses to set up, including changes of use and alfresco permits.”

Residents living in close proximity to these areas, such as us, must be considered and consulted with in order to preserve and continue the harmonious accord between all stakeholders.

“Working to ensure that the Subiaco Town Centre remains the heart of the City of Subiaco, and achieving the appropriate balance between development in central Subiaco and around the fringes.”

This statement seems contradictory to the huge increase of density infill and rezonings around Daglish and Shenton Park stations and Rokeby Road South area, which are all currently majority single residential. If the rezonings of the station areas are to bring more people to use the public transport and provide suitable amenity there, surely this will detract from the use of the main Subiaco station and the amenity and businesses there? Instead, focusing on truly creating a heart in the town centre of Subiaco, with feeder buses or other forms of supporting public transport for those living in the aforementioned areas, to then use the main station (for peak hour, higher carriage trains), would better support the achievement of “appropriate balance” sought?

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“The 1950s - 1980s saw the ongoing expansion and modernisation of Subiaco; its services, facilities and landscape. Demolition and redevelopment, high density building, apartment living and contemporary construction materials and techniques were features of Subiaco during this period. This led to concerns about the preservation of a Subiaco identity and sense of place and resulted in the establishment of the city’s first heritage policies.”

The acknowledgement of this fact is important but is totally ignored by the new LPS5, which would cause even more insensitive demolition and redevelopment of the key character areas!

“The rapid increase in housing stock has been due to redevelopment of the old industrial land in Jolimont, known as Subi Centro by the Metropolitan Redevelopment Authority (MRA). Mixed use development, provided in both ground and multiple levels, has become an accepted form of new development within this area, and other areas of the City of Subiaco.”

If that is the case, why are so many apartment in Subi Centro vacant or very hard to sell, according to local real estate agents who want to sell anything but apartments due to that fact? They can sell houses very easily, but according to them, people don't want to buy apartments, the market is oversupplied with them across Subiaco and across Perth already. Also, in which other areas of the City has mixed use development become the “accepted new form of development”?

“The criteria set out in Draft Perth and Peel @ 3.5million and the structure of activity centres in Directions 2031 indicates that City will continue to provide for population growth in close proximity to train stations and centres of activity.”

The criteria set out in Draft Perth and Peel @ 3.5million to provide for population growth in close proximity to train stations fails to recognise the differing needs of the heritage stations of Daglish and Shenton Park, and their lack of suitability to high increase in density, given their size and capacity. The criteria also fails to take into consideration the character and amenity of the areas surrounding these stations

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“The City of Subiaco’s rich, diverse and valued heritage is reflected in its buildings, places and streetscapes. The City’s program of identifying and providing protection of places and areas of heritage value will ensure that increased population growth can occur without being at the expense of local heritage values and character.”

This claim is patently impossible to uphold with the current LPS5 set to obliterate approximately 50% of character homes and is insulting to residents intelligence that this statement has been made in this document.

“The City of Subiaco understands and accepts its obligations to accommodate growth and change, and welcomes the net benefits these changes can bring to the City. However, it is clear that a continued increase in the number of residents, workers, visitors and students will demand a considerable commitment by the State Government to upgrade public transport infrastructure and improve its provision of services.”

Instead of just accepting figures, the City should be questioning why it is being “obliged” to meet these expectations for growth and change, when the data for these expectations is based on outdated population figures, and even more so in the face of a current draft with a vast further increase of density imposed by the WAPC. Where are the justifications for this. Why is the Council just “accepting”, when the residents it is supposed to represent, are not?

Page 10 - Future Planning of the City

“Particular areas of the City are recognised as having significant heritage and/or character value. It is important that any changes to the City’s planning framework respect this existing character.”

This claim is patently impossible to uphold with the current LPS5 set to obliterate approximately 50% of character homes.

“The City understands the intent behind the State Government’s policy, but with the benefit of extensive community feedback, knows that change can only be achieved through the adoption of a co-ordinated and carefully targeted growth strategy. This will ensure the existing, highly desirable character of Subiaco will be protected. It is also acknowledged that a modest and appropriate increase in population will generate economic benefits through business sustainability, and lead to a more vibrant town centre where local people can work, shop, visit and play.”

So why is there a MASSIVE increase LPS5 in density around Daglish and Shenton Park stations and Rokeby Road South, nowhere near the town centre? When asked why, the Council and WAPC cannot give any sound explanation or justification for the change, yet the Council says it understands the intent?

“The City intends to demonstrate that, through the adoption of this LPS and the proposed TPS 5, it is possible to facilitate appropriate new development in a manner that is sympathetic to and retains the existing desirable character of the City.”

This intention is simply impossible to demonstrate through the adoption of this current draft LPS and LPS5. A new strategy and plan is required because this one is seriously fails to demonstrate anything close to being sympathetic and retaining the existing desirable character of the City .

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2.1: Key objectives of the Local Planning Strategy

These are AT ODDS with the Local Planning Scheme:

(b) To accommodate a reasonable increase in population and housing stock in appropriate locations;

It is not a reasonable increase that is proposed in LPS5, nor is it justified or based on accurate population forecasts

(c) To maintain the City’s excellent provision of housing choices and variety of neighbourhoods;

This will be compromised as there is already an oversupply of apartments, many of which have yet to be built in Subi Centro and other sites such as the oval and PMH. What will be lacking after those are done is single storey houses with backyards for families - plenty of which we currently have in the Shenton Park and Daglish Station precincts!

(d) To plan for the appropriate redevelopment of major sites which will become available in the short, medium and long-term;

This is now beyond the control of Council as council has given power over for major redevelopment to the SRA and MRA. As detailed on page 13 *“The Metropolitan Redevelopment Authority proposal for Princess Margaret Hospital is largely still unknown. Approximately 400 dwellings were estimated during the preparation of the North Subiaco Structure Plan. However, this could be as high as 2,800 dwellings if the 60% of the 30Ha site was fully developed at R160.”*

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(e) To foster a ‘sense of place’ unique to Subiaco and an attractive urban environment;

Is incompatible with the destruction of character neighbourhoods as proposed in Draft LPS5.

(f) To protect and enhance local heritage and character;

Is incompatible with the destruction of character neighbourhoods as proposed in Draft LPS5.

(i) To maintain and enhance natural resources;

One of our biggest natural resources is our tree canopy and urban forest, the densest part of which is in Subiaco South and Shenton Park. Exactly the areas that are being targeted for infill, so you will destroy our natural resources instead!

(l) To make more efficient use of existing infrastructure and resources such as public transport, land and financial resources; and

Sounds great but where's the plan? And where's the money?

(m) To provide necessary services and meet community needs.

The community needs you to service them by rejecting LPS5 and working out a much better and justified plan that doesn't destroy half the City and peoples lives in the process, all for the sake of a Government policy and developer's interests!

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"3. Strategies, Actions and Implementation

The City favours a strategy whereby the majority of additional population and employment is accommodated in and around selected activity centres and station precincts. Further population can also be accommodated in select large under-developed sites or other sites occupied by government institutions. The benefits of this approach are as follows:

• There is controlled and limited impact on existing single dwelling streetscapes and character;

An wholly untrue statement given the massive impact on character neighbourhoods of Shenton Park, Dalglish and Subiaco South which are mostly single dwelling streetscapes.

• Additional population and employment is located in areas where access to alternative (to motor vehicles) transport modes and services is greatest;

How is it greatest when these heritage stations cant handle more than 4 carriage trains?

• The additional population and employment, being located within and around nominated locations, will contribute to the viability of these locations.

What is the evidence of this, given the failed experiment of Subiaco North around Roydhouse and Hood Streets?

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"3.1.4 Rokeby Road South

...The draft Central Sub-Regional Planning Framework identifies Rokeby Road as a corridor appropriate for accommodating additional population and employment. It is recommended the development provisions applicable to this precinct be reviewed to provide a dwelling density of between 15-25 dwellings per hectare, coordinated in a way to respect the character and scale of adjoining single residential areas. This is equivalent to R-Coding between R30 and R80."

Why has the zoning automatically been put to Mixed use R80 to achieve density of 25 dwellings per hectare? Why is not a middle ground found that would be far more sympathetic to the heritage areas of single dwellings immediately surrounding it on both sides. This proposal looks very much like that of Scheme Amendment 35 that was so vehemently opposed in March this year by residents with over 200 submission all in opposition to it and over 2,500 signature petition. This Council driven agenda for this area is no more welcome than that was and the Save Rokeby South Community Group has provided a far more appropriate and positive alternative for the creation of a Rokeby South Precinct and vision that I encourage you to adopt. (See Appendix 1)

Further, with regards to Rokeby Road South and LPS5 Schedule C, I submit the following:

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- 5-6 storeys at 17m building height is far too high to be located adjacent to single storey housing, such as our house. The current allowance for 4 storeys at 12m is adequate and workable and should be maintained however with modified setbacks as detailed in Appendix 1.
- Setbacks to the ROWs are grossly inadequate especially with regards to balconies, overshadowing and overlooking.
- Duke Street, sloping down significantly to the west will experience and see a much higher building.
- Furthermore, with the City having virtually no design or development controls currently in place nor any proposed by the plan to break down building bulk and mass through say varying roof forms and pitch, varying façade treatments and fenestration, podiums, atriums, courtyards, volumetric spaces, split levels, internal and external building setbacks etc, the likelihood for development in this area to result in homogenous bulky, planar and bland built forms is a serious concern. This will detract significantly from the current village character sensed and enjoyed by local residents and visitors to Subiaco.
- Arguably, the desired composition of the interface between existing and future development within the Commercial/Residential zone and existing and future development within the adjoining Residential zone is sorely lacking. The plan does not provide for development that is respectful in height and bulk to the single storey houses especially of the heritage/conservation areas to the west.
It cannot be successfully achieved by merely using the existing laneway to separate future mixed use development within the Commercial/Residential zoned land to adjoining Residential zoned land. It requires a more nuanced approach.
- The plan will destroy the cohesive single storey built form and the character of the streetscapes of the surrounding heritage/conservation areas (Planning Policies 3.11 and 3.9) that significantly contribute to the identity of the City of Subiaco and warrant protection from unsympathetic development. These policies have been developed and are backed by strong community support and the changes proposed by the amendment do not reflect the community vision.
- The amendment contradicts the Australia ICOMOS Burra Charter principles for the treatment of heritage places such as Duffel House and the Union and Redfern Heritage Area by ensuring the *“Retention of an appropriate setting. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place.”*
- The bulk of the proposed development at No. 385 (lots 23, 24, 25 & 26) Rokeby Road South will be incompatible with the prevailing narrow lots that are not likely to be amalgamated in the future to create a lot large enough to accommodate developments similar to that proposed for No. 385. This will result in an inconsistent streetscape.
- No parking and traffic studies have been carried out and made public to inform residents. The additional traffic has not been quantified as no Structure Plan Level Traffic Assessment has been performed.
- Traffic is already congested in the narrow residential streets surrounding Rokeby Road South, as residents rely on parking in the streets due to the absence of garages, and the fact that carports are not permitted in the heritage areas at the front of houses. Many of these streets are so narrow and allow cars to be parked only on one side. This reduces the space available for passing vehicles and makes the streets just wide enough to be passed by one car at a time.

- Additional traffic generated by the plan is likely to spill over into the neighbourhood streets that are not designed for high traffic volumes and not likely to cope with this influx. Moreover, 'rat running' using the local street network and ROW (especially if the Western Power sub station near Nicholson Road is likely removed) as a short cut to avoid Rokeby Road South traffic, will occur. The impact on road safety is unknown.
- A greater number of customers and visitors to the area generated by the amendment will exacerbate existing on-street parking problems. Rokeby Road South offers no long term parking opportunities and the existing businesses do not provide off-street parking for their customers. Already residents, who need to park on the streets, find it difficult to park outside their houses as they compete with these visitors/customers. This leads to situations where the residents or their visitors are not able to park in close vicinity to their house. However, parking west of Rokeby Road South is regulated by parking permits and residents cannot legally park long-term on streets other than their own without getting booked.
- The plan does not give sufficient regard to the urban design outcomes for the western adjoining ROW that separates Campbell Street and Duke Streets from Rokeby Road South, and the eastern adjoining ROW that separates Rupert Street. No studies have been undertaken to assess whether the ROW is wide enough to accommodate increased traffic from service requirements and cars accessing underground parking that would result from the increased intensity of development proposed by this amendment.
- Additionally, consideration must be given to residents' houses that have been extended right to the property boundary, such as ours, meaning that there is no separation between the road and the habitable spaces of the residences, as well as residents entering their garages via the ROW, or leaving their residences through their back gates to walk through the ROW. This may call for additional setbacks from the residential single storey houses and potentially for the construction of a footpath to make sure residents can safely exit their backyards.
- Adverse effect on the residential amenity of neighbours - these effects relate to increased noise, overlooking, loss of privacy, overshadowing, increased pollution, reduced access to sun light and winter warmth, disturbance from light coming from the upper storeys of the developments at night, loss of solar access etc. All of these adverse effects will significantly impact us and other residents will have a detrimental impact on ours and their health and wellbeing.
- Overlooking aspect and loss of privacy - The balconies on the rear, of the buildings which are active habitable spaces, will provide uninhibited view into our outdoor areas and other residents' backyards - so we will no longer enjoy any privacy in the boundaries of our own backyards.
- It is illogical planning to undermine an entire area's character and amenity for the sake of a mere 100 dwellings, to reach a density target that is not yet justified.
- Why is the building height for this area, higher than that allowed for Nicholson Road, Onslow Road, Aberdare Road?

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“3.1.5 Dalglish & Shenton Park Station Precincts

The LPS encourages residential development at a minimum of 25 dwellings per hectare (R50 - R80) within 800m of railway stations, and residential development at a minimum of 40 dwellings per hectare (R80 and above) within 400m of railway stations. Any additional population accommodated within the station precinct should occur having regard to:

- 1. The need to protect heritage areas and places identified of to be heritage significance;***
- 2. The need to consider residential character and streetscapes and the value the community places upon that, and,***
- 3. locating most of new development within the immediate context of the station, and/or away from areas identified in 1 and 2 above.”***

The very development the Council’s LPS encourages as stated above, completely undermines the 3 points made above! You cannot redevelop character neighbourhoods with heritage or potential heritage listings within them and protect them at the same - defies all logic and reason!

SOME COMMENTS REGARDING DRAFT LOCAL PLANNING STRATEGY - PART 2

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“3.6.2 SPP No. 3 - Urban Growth and Settlement (2006) (SPP3)

This policy aims to facilitate sustainable patterns of urban growth and settlement by setting out the requirements of sustainable settlements and communities, and broad policy for accommodating growth and change.

The objectives of the policy are: To promote a sustainable and well planned pattern of settlement across the State, with sufficient and suitable land to provide for a wide variety of housing, employment, recreation facilities and open space.”

The rezoning of the Dalglish and Shenton Park precincts does not represent a well planned pattern of settlement with sufficient and suitable land to provide for a wide variety of housing, employment, recreation facilities and open space. It is already densely populated with heritage and character homes and not enough open space or recreational facilities!

“ To build on existing communities with established local and regional economies, concentrate investment in the improvement of services and infrastructure and enhance the quality of life in those communities.”

The rezoning of the Dalglish and Shenton Park precincts and Rokeby Road South does not represent an enhancement of quality of life in those communities, it represents a degradation of quality of life.

“ To manage the growth and development of urban areas in response to the social and economic needs of the community and in recognition of relevant climatic, environmental, heritage and community values and constraints.”

The Draft LPS5 flies in the face of this policy objective as it is not sympathetic to environmental, climatic, heritage, community values and existing constraints of the area AT ALL.

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“ To promote the development of a sustainable and liveable neighbourhood form which reduces energy, water and travel demand while ensuring safe and convenient access to employment and services by all modes, provides choice and affordability of housing and creates an identifiable sense of place for each community.”

The Draft LPS5 fails in this regard as the development types required to achieve the desired rezoning levels will require more energy and water demands, cannot satisfy travel demands as you cannot travel everywhere by train or bus and housing will not be affordable as the price of land is too high and developers will charge the maximum for their developments to make their returns. There is an existing clear and positive sense of place ALREADY that will be destroyed by LPS5!

“ To co-ordinate new development with the efficient, economic and timely provision of infrastructure and services.”

There is no proof of any of this provided by State Government or Council in the advertising of this LPS or LPS5. It is absent.

“The City has taken into account the various policy objectives and measures contained within SPP No. 3 Urban Growth and Settlement to ensure that new development in Subiaco occurs in accordance with the above-mentioned objectives.”

How is this possible given the above and the current draft LPS5 that Council has endorsed to advertise?

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“3.6.3 SPP No. 3.1 - Residential Design Codes (R-Codes)

The R-Codes apply to all local governments in WA, and control the density, design and development of housing. The City of Subiaco is required to incorporate the R-Codes into Local Planning Scheme No. 5 (LPS5). Local variations may be provided for through local planning policies and supplementary provisions contained in LPS5.”

Given that there are new draft Apartment Design R-codes in circulation by Government since 2016, as noted in the LPS under 3.6.4 Draft State Planning Policy No. 7: Design of the Built Environment (SPP7), how can residents know with certainty now, what the zonings will actually end up entailing, since a lot of the rezoning will be to build apartments? What are the details of the “Local variations” that may be provided for through Councils planning dept? Where are the details so residents can be fully informed now in this public comment process?

“3.6.5 SPP No. 3.5 - Historic Heritage Conservation (2007) (SPP3.5)

This policy applies principally to historic cultural heritage including heritage areas, buildings and structures and other places and areas of heritage significance at both the State and local level. This policy does not apply to Aboriginal heritage or natural heritage.

The objectives of this policy are:

- To conserve places and areas of historic heritage significance.***
- To ensure that development does not adversely affect the significance of heritage places and areas.***

... The issue of residential heritage is very relevant to the City, and is currently being addressed through policy development, namely the preparation of the City’s Strategic Heritage Plan.”

Draft LPS5 is incompatible with this policy in that it does not conserve large areas of historical significance to the City, including areas under consideration for Heritage protection, and does not ensure that development will not adversely affect these areas. Further, when the Councils planning department knew that a new LPS was required, why did it not undertake to complete the City’s Strategic Heritage plan first, if the City’s residential heritage is very relevant?

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“5.2 The City’s objectives

City’s Strategic Community Plan identifies objectives relevant to the City of Subiaco LPS as follows:

- **A sustainable environment that is well-maintained, green and leafy** - severely compromised by DraftLPS5
- **A wide range of well used parks, streetscapes, open spaces and public spaces** - The City is already underquota for open space, with the scale of infill proposed in LPS5, this will fall further below international standards, significantly.
- **A unique, vibrant and diverse city that is welcoming to residents, workers and visitors** - there is nothing unique about concrete apartment blocks that reduce amenity, and increase lack of community.
- **To develop the economic sustainability of our city** - infill and density are not the only way to achieve this, it takes much more than just more dwellings. North Subiaco with all its empty apartments and dead zones is testament to that.
- **A built form that is recognised, celebrated and protected** - impossible with Draft LPS5
- **A sustainable city that balances the requirements of an increasing population, whilst maintaining its valued character** - impossible with proposed Draft LPS5
- **A transport management system that meets the needs of all users** - Great sounding in theory!
- **A range of infrastructure to support a sustainable and accessible transport system** - Great sounding in theory!

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“Within Subi Centro, the City’s fastest growing precinct, the number of school-aged children is very low. Households are predominantly childless. Of the 2016 population of 3,243 persons only 234, or 10.6%, were aged between 5 and 19. Only 192 were aged between 5 and 14 years of age. These children can all be accommodated in existing nearby schools. There is no need to plan for a new primary school within the Subi Centro precinct. However, the Department of Education has indicated that the Subiaco North area may place some additional pressure on existing primary school resources as population growth accelerates in this area.”

What about all the additional dwellings in the Darglish and Shenton Park rezoned area - or are these new apartments not intending to cater for the hundreds of families they will displace? Or for new families, as the area is very attractive to currently? Subiaco Primary and Rosalie are at capacity, Shenton College is already one of the largest state schools and the to be build Inner City College can only cater for a maximum 2000 students and the Government in Parliament has confirmed it will have no further capacity beyond that. So where will all the students go for primary and secondary schooling - not everyone can and should afford private schooling!

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“8 Urban Design, Character & Heritage

...The City also recognises the close links that exist between conserving heritage, as well as protecting and enhancing local character and the established ‘sense of place’ that the Subiaco community identifies with, and the promotion of good urban design principles in new development. Evidence of this commitment can clearly be seen in:

- the adoption of relevant goals and objectives as an integral part of the City’s vision and mission statements;*
- the adoption and application of numerous planning policies, design guidelines and detailed area plans aimed at protecting and enhancing relevant areas, precincts and specific sites;*
- the acceptance by Council of the community’s strongly-held views supporting Council’s stance on these issues, as articulated in the results of the Think2030 visioning’ exercise.*

One of the main aims of the new LPS5 will be to clearly articulate the high priority the City places on conserving heritage, protecting and enhancing local character, and encouraging good urban design in the development of new buildings, urban spaces and streetscapes.

These statements are all incongruous with what is proposed in the Draft LPS5. Character neighbourhoods and areas being considered for heritage status will be destroyed but what they are either replaced with or will be surrounded by (ie mid- to high-rise apartment blocks).

“Therefore, the city proposes to locate additional population within the Darglish Station Precinct, but not within these areas of identified character. The residential density targets of the station precincts can be satisfied without the need to rezone these areas to a higher density code.

...Whether Council resolves to designate these areas as heritage areas or not, they are considered areas of special character to the city and the city is satisfied that the residential density targets of the station precincts can be met without the need to re-zone these areas to a higher density.”

So where will the infill then go if the WAPC wants it and the Council tries to protect the areas it highlights in figures 29, 30 and 31? Will it mean higher rise in other parts of the station precincts, or other areas? Why aren’t other streets in these precincts being considered for heritage listing if it means it can provide some sort of protection against infill? Are they not of value?

FURTHER GENERAL COMMENTS ON LPS AND LPS5

Politically, both at a State Government and Local Government level, the inadequacies of both the plan put forward to residents and the lack of justification and transparency in the process is a great cause for concern.

As the convenor of Save Subi and also Save Rokeby South, it is beholden on me to indicate to you just how negative this issue is on a political level and platitudes aside, we all know how key that is, to careers, to polls, to elections. All residents realise that we do not live in traditional Labor territory, however, the lack of regard that residents feel is more than palpable and is concerning for its ripple on effects. With regards to Local Government, all electors eyes are firmly on Council now to act on the will of the people and not on other interests. To reject it. Not to modify it. Its fundamentally flawed. We know the people have spoken this loudly and clearly from the outset and you have received this message now too.

This City needs protection not destruction, it needs to be seen for the valuable place that it is, for the appealing attributes it already has for tourists, and the legacy this Council and State Government leaves needs to incorporate a positive story that shows that they did listen and act in the best interests of the community, not developers or inflexible policy agendas.

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You have said that you want us to tell you where we want the density. Sure, sites like PMH KEMH, around the Oval, TAFE site, self lock storage site, Subi Centro is not yet finished and adjacent to the city, Montario Quarter could be supplemented with the Health Department's annex site on Stubbs Terrace and the railway reserve land on Stubbs Terrace that is currently light industrial. You don't even need to rezone around these two railway stations to achieve the infill that is necessary and that's the thing here - its NOT necessary! Before all else, the case for density must be accurately justified, we want the population figures reviewed. The population forecasts that this was all based on are "outrageous", as admitted by Minister Papalia recently in Parliament!

What is desired by all is your leadership giving us a way forward that is positive, open and inclusive of the community to reach a new plan that addresses the need for JUSTIFIED density based on ACCURATE forecasts that PROTECTS the City's unique identity and LEVERAGES the better development opportunities that DO NOT DESTROY the very fabric of this City, for an enhanced SUSTAINABLE future. The current LPS and LPS5 that is before us is grossly inadequate in this regard and should be REJECTED outright. Its not a good look or experience for anyone. And terms like "precincts" and "nuanced" are not satisfactory to the masses. You can do much better and that's what we would like you to do. We'd like to be able to have faith and confidence and trust that Local and State Government can do this properly. Its now up to you to prove that it is possible and that we have voted in a State and Local Government that will do so.

We need a 21st century approach and a 21st century plan. Look overseas and over east, they are realising that plans like this are not the way forward. Dont stubbornly push through regardless, even a doctored version. You only have one shot to get it right and what we will lose here in our particular City's instance, can never be rebuilt but its destruction will always be remembered.

Lastly, to reiterate the Council's stated Vision and Mission, adopted under its Strategic Community Plan, I have deleted key points in **bold** of this that the draft LPS and LPS5 does not support, for your consideration:

Vision: 'In 2030 the City of Subiaco is a unique, popular and welcoming place. ~~The City celebrates its rich history~~, while embracing the diversity and vitality of the present. ~~The parks, public spaces, events and recreational opportunities are easily accessible~~ and promote a healthy lifestyle for all. There is a diverse range of local businesses and entertainment that contribute to a lively atmosphere. ~~The City faces the challenges of the future with strong leadership~~, an innovative approach and ~~emphasis on community values and voices~~. ~~Sustainability, in all its forms, is at the core of the community~~ and underpins the City's operations.'

Mission: '~~To enhance the lives and wellbeing of all in the life of the City of Subiaco, by engaging the community, providing regional leadership, stewardship, infrastructure and services that preserves our community sense of place and positions it for a sustainable future~~'.

Its not sounding so good anymore, is it?

LPS5 ought to reflect the desired aspirations, direction, shape, and form of Subiaco's physical environment over the next 10 to 15 years as envisaged by the Subiaco community, especially those who ALREADY reside in the City.

I very much hope and expect Council to see that it is in its own best interests, let alone the residents', to strongly REJECT this draft planning scheme and strategy and work with the community instead on creating a thoughtful and responsible new one that truly does work for the betterment of the City as a whole for current and future generations. We are all just custodians, and we are enjoying this place just like our predecessors have and we owe it to the next in line to make it an even more beautiful and liveable, healthy and unique place. We residents are ready to do so and Subiaco deserves no less, it has given so much.

I urge Council to use its resources to have this Planning Scheme rejected by the Planning Minister as well and thank the Council for their efforts in doing so, in advance.

Yours sincerely,

Genevieve Binnie

13 July 2018