

FLOREAT FORUM PSP ISSUES/CONCERNS

To inform public submission content

#	PLANNING ISSUE	SOLUTION	ASSESSMENT AGAINST PLANNING POLICY & FRAMEWORKS
1.	<p>INCONSISTENT WITH PLANNING FRAMEWORKS</p> <p>The draft plan is inconsistent with the state planning framework (including State Planning Policy 4.2) and the WAPC endorsed Local Planning Strategy (2021) as it contains heights well above 6-8 stories as required by those frameworks.</p>	<p>Significant scaling down of the proposed building heights to reflect the community endorsed and Western Australian Planning Commission (WAPC) approved Local Planning Strategy and the activity centre hierarchy defined in SPP 4.2. Maximum building heights of 8 stories and apartment density placed above the shopping centre.</p>	<p>WAPC's State Planning Policy 4.2 (Activity Centres for Perth & Peel) identifies the Floreat Forum as a District Centre. Centres of this designation should have mid-rise buildings (medium sized apartments, townhouses and grouped dwellings) only with new development creating pedestrian scale street frontage. Mid-rise apartments defined as 6 storeys in the Residential Design Codes Vol 2.</p> <p>The supporting documents to the Town of Cambridge Local Planning Strategy (LPS, 2021) state a maximum building height of 8 stories. The LPS states that density is to be placed above the commercial and retail centre.</p> <p>In contrast the APIL Group proposes multiple high-rise towers of 18-20 stories, and no density placed above the existing retail shopping centre.</p>
2.	<p>COMPROMISED CENTRE/PRECINCT FUNCTION AND INTEGRITY</p> <p>Proposed development intensity is inconsistent with its District Centre designation in the activity centre hierarchy (SPP 4.2) which limits building heights to 6 stories.</p> <p>Proposed intensity of residential land use tips the mix out of balance which is an undesirable policy outcome under SPP 4.2. This is further exacerbated by the proposal to re-code the shopping centre to RAC-0 which indicates high-rise will be built on the shopping centre in the future (see further comment below)</p>	<p>Reduced scale of residential development to align with the LPS (maximum height of 8 stories), and therefore remove the risk of overdevelopment of residential apartments in time through limiting the r-codes proposed to a maximum of RAC-3 as contemplated in SPP 4.2 for a mid-rise urban centre.</p>	<p>Floreat Forum's function is defined as a District Centre under SPP 4.2. Further, policy measure 7.1 (e) under SPP 4.2 requires decisions about this centre to be consistent with and support the activity centre hierarchy. Decision makers are directed not to support planning instruments which are likely to undermine the established activity centre hierarchy and unreasonably affect the amenity of the locality.</p> <p>The APIL Group seeks to amend key acceptable outcomes listed in Part 2 of the Residential Design Codes Volume 2 with respect to building heights. Specifically, they seek to amend building heights from 6 storeys as required under SPP 4.2 (mid-rise apartments defined as 6 storeys in the R-Codes Vol 2) by proposing multiple towers of up to 20 storeys. The significant amendments proposed are contrary to the principles outlined in 7.1(e) of SPP 4.2 and should not be supported. Supporting these amendments would disrupt activity centre hierarchy by unnecessarily elevating Floreat to the equivalent of a District Centre with a train station. The closest train station is in Shenton Park Station approximately 3km away.</p> <p>Further, because the APIL Group is not forthcoming with planned future development above the shopping centre but is proposing to code the shopping</p>

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			<p>centre RAC-0 which enables unlimited heights, this suggests there is a significant risk the activity centre site will be overdeveloped with residential dwellings. If the centre is overdeveloped with residential dwellings, it will compromise and undermine the centre's ability to focus on retail, job opportunities, community facilities and services for the broader community and catchment which is inconsistent with WAPC policy. The centre serves a broad catchment, and the importance of this centre cannot afford to be compromised.</p> <p>Residential overdevelopment will also have significant implications for the road network which in parts is already at capacity, and this cannot be supported. The Boulevard is at capacity, as demonstrated in their Traffic Impact Assessment TIA). Unreasonably affecting the amenity of the locality through traffic impact is specifically referenced in 7.1 (e) as a reason not to support a planning instrument.</p>
3.	<p>CUMULATIVE DEVELOPMENT IS NOT FULLY CONSIDERED IN THE DRAFT PLAN</p> <p>Proposed coding of the shopping centre building footprint (RAC-0) indicates future development is planned, but this development is not contemplated fully in this proposal. It raises concerns that further high-rise could be planned in the future for the shopping centre site. This would have significant negative impacts on traffic and amenity if allowed, thus should not be supported in this proposal.</p>	<p>Plan needs to be more forthcoming on what is proposed for the site, particularly the shopping centre, and the timing of its development.</p> <p>And that full plan should have density on top of the shopping centre to a maximum of 8 stories, and all other proposed towers reduced to a maximum of 8 stories. To be consistent with the LPS and state planning frameworks.</p>	<p>The intent of WAPC's State Planning Policy 4.2 (Activity Centres for Perth & Peel) requires PSPs to be forthcoming about cumulative development.</p> <p>The APIL Group states (page 29) that a constraint of the precinct is the "<i>long term lease commitments and operating requirements of the centre</i>". And that the opportunity is to "<i>consider a staged approach to redevelopment that allows for both the staged enhancement of the centre and associated public amenity and the ongoing operational requirements...</i>"</p> <p>The plan proposes RAC-0 for the shopping centre, but it won't be developed until year 12 of the development (page 47 staging plan). And even then, for the existing shopping centre it's only proposed to introduce a new 'mini major' retailer and reconfigure the basement carpark (page 47). The PSP appears to be deliberately withholding information about the development of the shopping centre to mask the potential cumulative impact which is unprofessional, and not in the interests of any other stakeholders, especially the community, and will not deliver the right outcome for Floreat for the long-term. This could be a deliberate attempt to hide the true impact relating to amenity, traffic, infrastructure and other negative community outcomes. If later in the lifecycle of this development an application is</p>

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			<p>sought to place more density on top of the shopping centre, the outcomes for traffic in particular would be disastrous for the community. We need to understand this full plan now, and ideally, we should see density proposed across the whole shopping centre now as contemplated by the Local Planning Strategy.</p> <p>Precinct Design Guideline C2.4.2 specifically requires a detailed implementation plan to deliver the intended land use. C2.4.3 states that developing a staging plan can demonstrate how the urban structure can evolve over an extended timeframe. It is implied that presenting only part of the plan, and not revealing the true extent of proposed development of the shopping centre as proposed by the APIL Group, is inconsistent with the design guidelines and therefore inconsistent with WAPC policy. This should not be supported.</p>
4.	<p>NOT DEVELOPING THE SHOPPING CENTRE</p> <p>Shopping centre footprint is not being re-developed, which is a priority for the community. Density placed above the shopping centre is a critical outcome of the Local Planning Strategy and must form part of the proposal - but it is very clearly not contemplated.</p>	<p>The Town proposes that the shopping centre redevelopment be carried out to include an upgrade to the retail centre and the addition of low-to-mid-rise dwellings above. This plan will be in line with the LPS, the Town's Visioning Workshops output, and the findings of the APIL Group's own community survey. This is the desired outcome.</p>	<p>The Town of Cambridge's Local Planning Strategy stipulates at page 70 that the shopping centre will be "<i>redeveloped to better interface with the surrounding public streets and open space, accommodating residential development above the commercial/retail area</i>". Furthermore, a key outcome of the Visioning Workshops completed by the Town of Cambridge with hundreds of residents in February 2024 was that "<i>The existing shopping centre should be rebuilt or substantially refurbished to enable a better and lower form development where apartments sit over the shops</i>" (page 6, Information Poster Boards, Town of Cambridge)</p> <p>The APIL Groups Precinct Structure Plan (PSP) does not meet community expectations of renewal and revitalisation in relation to the shopping centre precinct. Multiple 18-20 storey towers are not an acceptable outcome to the community, when the alternative of residential development being placed above the shopping centre would mean 18-20 storey towers are not necessary. Community expectations are clear through the consultation completed as part of the Local Planning Strategy development and through community consultation in 2024 undertaken by the Town.</p> <p>While there are major failures with the APIL Group's community consultation, the APIL Group's online community survey found that 50% of respondents responded that a key place for redevelopment is over the existing mall.</p>

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5.	BUILDING HEIGHT The proposed building heights are not consistent with state planning policy, the local planning strategy nor community expectations which stipulate 6-8 stories.	<p>There is a stark contrast between mid-rise building heights required in this precinct by State Planning Policy and Local Planning Strategy, and the 18-20 story towers proposed. The proposal should be limited to 8 stories across the site.</p> <p>Very happy with the building heights proposed in the residential frame, and recognise that they are broadly consistent with the LPS and transition principles in state planning policy.</p>	<p>WAPC's State Planning Policy 4.2 (Activity Centres for Perth & Peel) which identifies the subject area as a District Centre, and identifies the requirement for the preparation of a Precinct Structure Plan to guide subdivision and development of land within the centre. SPP 4.2 stipulates mid-rise apartments for Floreat as a District Centre. SPP 7.3, the Residential Design Codes Vol 2 (pg 15) defines mid-rise as 6 storeys. Pushing heights to 20 stories contradicts State Policy hierarchy, as only a District Centre with a train station is identified as having high-rise. It also contradicts the Town of Cambridge Local Planning Strategy (2021) which stipulates density is to be built <u>above</u> the shopping centre and it contradicts the Town's supplemental Housing Yield Analysis which stipulates a maximum building height of 8 stories.</p>
6.	DEVELOPMENT SCALE The proposed scale of the Floreat Activity Centre is not consistent with the surrounding suburb, is not consistent with the planning frameworks, and is not supportive of its location which is <u>neither</u> near a train station nor supported by Primary Distributor roads (dual carriageways). It is only supported by single lane Distributor A roads, one of which is at already capacity (The Boulevard)	<p>The community desires a civic centre that is worthy of the surrounding suburb and which protects the residential amenity. A finer grain, mid-rise form across the Floreat Forum shopping centre site, and mid-rise development across the entire site, would create a more seamless relationship with the surrounding amenity.</p>	<p>State Planning Policy 7.2 - Precinct Design, including SPP7.2 Precinct Design Guidelines. C2.1.1 in the guidelines states that the existing urban structure should be assessed and the infill precinct should respond to factors that contribute to the precincts significance, character and sense of place. These are the first principles that should be applied to the design of the precinct. This should acknowledge that the precinct is surrounded by 1-2 story single dwellings on larger residential blocks, in a mid-century inspired garden suburb, and the design of the precinct should respond to that sense of place.</p> <p>C2.3.4 states that the plan must "<i>provide for a transition or delineation from large development sites to finer grained adjacent areas through considerations of existing and intended scale, built form, land uses and street design</i>". There is no transition to the north and south of the proposed development. The intended scale of the 18-20 towers are well out of proportion and should not be supported.</p> <p>The proposed 18-20 story towers will be out of character to the surrounding area, and will detract significantly from the precinct's sense of place. They will result in a significant, negative juxtaposition to the surrounding low-rise residential area:</p> <ol style="list-style-type: none"> 1. In the immediate area there are no building heights above 2 stories. 2. Further afield and to the south of the Activity Centre, Perry Lakes has some mid-rise development (of around 6 stories) and there are mid-rise apartment dwellings on Cambridge Street, Wembley (of around 6 stories), older style flats on Cambridge Street, Wembley (of around 8 stories).

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			<p>3. In contrast, high-rise development to the West and South of the precinct includes Subi-One, which is located next to the Subiaco Train Station, and The Grove which is located on Stirling Highway which has a Primary Distributor designation and is constructed as a dual carriageway.</p> <p>4. This means that for the Floreat Activity Centre, mid-rise heights of 6-8 stories would be broadly complimentary with other developments in the surrounding area, consistent with the planning frameworks, and supportive of its location which is <u>neither</u> near a train station nor supported by Primary Distributor roads (dual carriageways).</p>
7.	<p>INADEQUATE COMMUNITY CONSULTATION BY THE APIL GROUP</p> <p>The way in which community consultation is presented by the APIL Groups throughout the PSP, gives a false impression of the level of community consultation and the techniques involved. The stark reality is only one online survey was used for the wider community, used only once, in 2022. The extent of stakeholder workshops was extremely limited. It is significantly inconsistent with the level of consultation intended by the state planning framework and raises serious concerns about APIL Group's true intent to respond to community expectations.</p>	<p>The community led PSP is currently being prepared by the Town of Cambridge, and is being prepared consistent with the Local Planning Strategy (2021) and using outputs from 4 Visioning Workshop sessions and one Open Summary Session with residents conducted in early 2024. This is the PSP that the community wants because it will limit building heights, will re-develop the shopping centre and will retain the library, and it directly responds to community feedback and consultation.</p> <p>APIL's PSP will need to be completely re-written to respond to community feedback, and to demonstrate consistency with local and state planning frameworks.</p>	<p>WA Government's <i>Action Plan for Planning Reform Better Planning, Better Places 2019</i> outlines the principles of early community engagement practices. The APIL PSP has had complete disregard for this concept and has resulted in a plan devoid of meaningful consultation and also any community support.</p> <p>The Precinct Design Guidelines under state policy (section 2.4 of State Planning Policy 7.2. pages 25-27) stipulate community engagement should always be proportionate to the scale of the precinct and the potential level of community impact. Due to the "increased density and building heights" making it a "highly contentious" this plan would be deemed complex and high impact and as a result, 19 different engagement techniques are listed for use under the policy. The APIL Group used 3 techniques, once for each group of stakeholders (community, retailers, and residents in the precinct frame) 2 years ago.</p> <p>The only engagement by the APIL Group with the whole community was <u>one</u> online survey in 2022. 500 responses were received, and 75% of respondents were from the Town of Cambridge which means only approximately 375 people responded to the survey who are residents from the affected area. What controls did the APIL Group put in place to ensure that responses with vested interests in the site being developed, were not considered? The survey asked people what they like and what they'd change about the shopping centre. The APIL Group now plans to not redevelop the shopping centre, so the community consultation doesn't reflect the proposal that's been submitted for consideration.</p> <p>If the community had been consulted consistent with state policy, we would have seen pressure for amendments and the plan would be in a much more</p>

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			<p>serviceable form. This is a fundamental failure in planning process and undermines its efficiency and the APIL Group's plan should not be supported.</p> <p>In contrast, community consultation to prepare the Local Planning Strategy (2021) was extensive and the Visioning Workshops in 2024 held by the Town of Cambridge provided opportunities for extensive community consultation. Feedback from the community from these workshops was clear about expectations for the site, which are in stark contrast to what the APIL Group proposes. This includes building heights (to 8 stories), the shopping centre being redeveloped and revitalized and the library retained.</p>
8.	<p>TRAFFIC IMPACT</p> <p>The existing road network will not support the proposed development through an increase in traffic volumes, despite statements by the APIL Group to the contrary. Further, the proposed modifications are unsatisfactory, unsafe and not well thought through.</p>	<p>The APIL Group must:</p> <ul style="list-style-type: none"> -include a developer contribution requirement to upgrade public transport given the Public Transport Authority (PTA) have no public transport improvements planned. -use updated traffic data counts and apply growth factors to their data if still required. -acknowledge that the Boulevard is operating above capacity, and that the entire network will be congested particularly at peak periods. More suitable modifications must be proposed to address this issue -provide accurate walking and cycling maps -the roundabout on Floreat Ave needs to be reconsidered to accommodate pedestrian traffic -The pedestrian crossing on Howtree that services the school must be reconsidered and moved back to original location at the very least. - A more thorough assessment needs to be made of the primary school pedestrian traffic to and from the school through the activity centre. Highschool foot traffic to and from bus stops on 	<p>The APIL Group states that <i>"the proposed development is unlikely to impact the surrounding road network and has the potential to activate the precinct"</i> and further that <i>"the road network has sufficient capacity to cater for growth in traffic related to the proposed PSP"</i> (page 54). We have significant concerns with these statements for the following reasons:</p> <p>(1) Saturday volumes (3 September 2022 as per appendix material to the Traffic Impact Assessment or TIA) have been used for Floreat/Boulevard and Howtree/Chandler West. Standard practice is to use weekday volumes as these are typically highest. In retail precincts such as the Floreat Activity Centre, Saturday can sometimes be highest, in which case both Saturday and weekday data should be used. Using Saturday data for Floreat Ave/Boulevard only may be suitable as that may in fact be the higher day, HOWEVER using Saturday data only for Howtree/Chandler West is misleading because weekday volumes will certainly be higher in this area due to school traffic and should have been tested.</p> <p>(2) All traffic volumes used are now well over 3 years old, and as per the table in the TIA a growth factor should be applied. Despite this the APIL Group has not used a growth factor. As a result, the data used is misleading and invalidates the report's claim that the network will support the proposed development.</p> <p>(3) Even without a growth factor applied, the traffic data supplied for the Boulevard indicates that it is already triggering a requirement to be upgraded to a dual carriageway (12,000 VPD is generally regarded as the trigger point). It is of great concern that this has not been acknowledged in the report and this further</p>

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		<p>the perimeter of the Activity Centre needs to also be properly considered.</p>	<p>invalidates the report's claim that the network will support increased movement associated with the proposed development.</p> <p>(4) the TIA's trip generation (defined as movements of vehicles to and from the Activity Centre) is calculated based on number of units/dwellings. Advice received is that number of units is not a good proxy for number of trips, and that number of carparking bays should be used to model the number of trips generated. Using number of units would increase the number of trips providing a more realistic view of the impact of this development.</p> <p>(5) The APIL plan does not show the likely full development of the precinct and as such, the impact on movement is misleading. Given it does not show any development of the existing main shopping centre, which is likely to come later, the actual impact of the total development would be far higher than the TIA forecasts.</p> <p><u>Public transport</u></p> <p>The Town of Cambridge's LPS Background Analysis Report (April 2021), states that redevelopment in this area must go "<i>hand in hand with enhanced public transport to support the development and ensure its viability</i>" (pg 122). The TIA makes little to no mention of the public transport that would be required to increase mode share and further. The report states that the PTA will not provide additional services to cater for the additional trips generated by the development.</p> <p>The TIA makes a "modal" assumption that 50% of trips will use public transport, when the historical trip data shows that approximately 5% of trips in Floreat are on Public Transport. And further, as mentioned above the TIA's under represents the number of trips generated by the activity centre by using number of units rather than carparks. The combined effect of these assumptions is to:</p> <ol style="list-style-type: none"> 1. over inflate the number of trips to be taken on public transport, thus under representing the impact of additional vehicle trips; 2. under representing the number of trips to be generated by the Activity Centre; which 3. act together to help support APIL Group's claim that the network can support the development proposed. However these assumptions are fundamentally flawed.

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			<p>Public transport should be used to take pressure off vehicle use due to the additional trips generated by the development. The report makes no mention of developer contribution to improve public services, this should be required given the PTA won't improve services. Developer contributions to public transport were required for the Karrinyup development, therefore they should be considered here.</p> <p><u>Active transport connections</u> The report indicates that the centre is well served by active transport connections (to support walking, cycling etc), but that is not the case. For the most part, active transport connectivity is limited. The walking and cycling catchment maps are not accurate and therefore, misleading. Footpaths are missing from much of the catchment area (eg there is no path on Chandler East and all of West of Floreat has no paths).</p> <p><u>Modifications</u></p> <ol style="list-style-type: none"> 1. Signals: APIL's plan indicates that the network will accommodate the increased demand with optimisation of the two existing signals and installation of signals at Floreat/Boulevard. Whilst these will help, they gloss over the issue that the network will be congested in peak periods as the volumes will be at or above what the surrounding network was designed to accommodate. The surrounding roads are only Distributor A roads, and the Boulevard is already operating above acceptable levels for a Distributor A road. 2. Pedestrian movement modifications: <ol style="list-style-type: none"> a. Pedestrian access from the east, near the proposed roundabout on Floreat Avenue, is not well considered. This design presents a safety issue because it does not consider the extensive school and other pedestrian foot and bike traffic that uses this intersection to travel east to west towards the Primary School. The proposed roundabout on Floreat Avenue does not consider how this pedestrian and bike traffic will cross Floreat Avenue safely.

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			<p>b. The overall pedestrian design fails to acknowledge that the main desire line is from Chandler East (CAE) to Chandler Avenue West (CAW). The design pushes pedestrians further from the desire line which is from CAE to CAW (which is the Floreat Park Primary School). It moves the main pedestrian crossing on Howtree Place closer to the Howtree/Boulevard intersection so traffic queues will form and block the Howtree/Boulevard intersection. This proposed pedestrian crossing arrangement is unsafe and fails to consider that there is a primary school crossing currently serviced with a lollypop man at the existing crossing site.</p>
9.	<p>CURVED INTERNAL STREET</p> <p>Proposed 'curvy' street connecting Chandler West and Howtree Place is unsafe, particularly with vehicles allowed. It is inconsistent with WAPC design guidelines as it should be a straight street with a clear sightline to the Primary School and the green open spaces adjacent to the school.</p>	<p>A straight street with a clear sightline from the east to the west of the precinct is recommended. Creating a sense of destination to and from the Primacy School and encouraging pedestrian traffic to safely move through the precinct. Vehicle movement should not be permitted on this street.</p>	<p>We are concerned about the first principles used to design of the curvy street running through the precinct connecting Chandler Ave West and Howtree Place. Precinct Design Guidelines c2.2.1 states that straight streets and clear sightlines are easier to navigate and safer for pedestrians. If the objective behind designing this street is truly to provide greater pedestrian access, then the principles in c2.2.1 should be adhered to. The design also does not adhere to c2.1.3 which states that APIL Group should identify existing key landmarks to create view corridors and highlight destinations and focal points within the urban structure.</p> <p>View corridors are important as they promote active and safe travel through a centre. Not having visual permeability through the centre as proposed will make navigation difficult.</p> <p>There is a significant opportunity to connect the precinct with the Floreat Park Primary School, which is a major destination point as well as the open green spaces to the west of the precinct. A straight street through the precinct which creates a clear, straight sightline and view corridor would achieve this. The curvy road proposed does not and further, putting vehicle movements through the middle of the precinct via this street is not good from a movement or safety perspective.</p>


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			It is clear that the first principles approach adopted by the APIL Group is to design a road which minimises any changes to the existing shopping centre building. This should not be supported.
10.	NEGATIVE INTERFACE WITH SURROUNDING SUBURB Poor interface to the surrounding suburb. There is no gentle or gradual transition to the existing low density residential land uses to north/west, south/west and in the north/east corner. These transitions are extreme, out of character and cannot be supported.	Reduce the height of the towers at the north/west, south/west and north/eastern extremities of the PSP to ensure sensible transition to the residential areas adjacent to these areas. This would align with WAPC policy and the LPS. Recommend development above the shopping centre area as contemplated by the LPS will achieve this. Maintain the sensible transitions proposed from the shopping centre to the east through the residential frame.	<p>WAPC's Consistent Planning Scheme's Report (May 2024) proposes to change the Model Provisions relating to Activity Centres to enshrine the principle that <i>"development at the edges of a centre is to be of a scale which facilitates transition with adjoining residential areas"</i>. This implies a gentle transition to adjoining residential areas. This means that the majority of the bulk and building height within a centre should be at its core, not at the extremities as is the case with the proposed PSP. The proposed transition from the shopping centre, graduating to the East through the residential frame at lower building heights is very good and consistent with State policy and the LPS.</p> <p>The APIL Group points to Karrinyup and Garden City as having developed on the fringes, and argues that this supports their proposed design. The first principle guiding the APIL Group's design is to not interrupt the operation of the two existing supermarkets on site. As a result they are not putting density on top of the shopping centre (in contradiction of the planning frameworks) and are forcing high-rise development to the fringes of the site to the north and south (in contradiction with WAPC policy). The APIL Group's argument fails to acknowledge that:</p> <p>(1) Garden City sought planning approval in its SDAU to demolish the pre-existing Woolworths. Therefore, attempting to use Garden City as a precedent that in some way supports the APIL Group's argument to not redevelop the shopping centre and not disrupt its long term supermarket leases and develop on the fringes is flawed.</p> <p>(2) Karrinyup is a Secondary Centre, which in the planning hierarchy means it is expected to have high rise development. Karrinyup is also supported by the Karrinyup Morley Highway, common name Karrinyup Road which is a Primary Distributor road (dual carriageway with separate median strip in the centre) which is another significant distinction from the Floreat site, which is only supported by Distributor A roads (single carriageway). It is therefore not a logical comparison as Floreat is a District Centre with mid-rise development under state planning policy.</p>

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			<p>(3) Karrinyup's current proposal to develop a high-rise tower on the south-west corner of the site, is in stark contrast to Floreat because the Karrinyup tower will mitigate the impact of overshadowing and overlooking by being located next to a Primary Distributor road that also has a central median strip, being located next to an outdoor carpark area, being sheltered by bushland to the south, and it's also on the site of a previous multi story office building (so there is precedent to have high rise here).</p> <p>(4) Garden City is not a suitable comparison to make, as Garden City is supported by two dual carriage-way Distributor A Roads with central median strips (Marmion Street and Riseley Street). Garden city also has extensive high rise in the immediate area along those streets, has significant areas of carparking on the fringes of the site, so any development on the fringe is of lower impact to the surrounding area due to the combination of carparking on the fringes and dual carriageway roads with median strips in the middle which buffers the surrounding residential area from any impact of overshadowing and overlooking. Plus there is precedent with other high rise in the immediate area.</p> <p>APIL Group's proposal provides insensitive transition to the north/west and south/west residential areas by virtue of 18-20 story towers on the fridge/extremities of the site facing 1-2 story single residential dwellings. In the south/east extremity a 8-12 story tower is proposed adjacent to 1 story single residential dwellings. The proposal will create significant overlooking and overshadowing impacts, which cannot be mitigated by the adjacent road network nor any other high-rise in the area. This is inconsistent with WAPC policy and the LPS.</p>
11.	ECONOMIC ASSESSMENT The first principles applied by the APIL Group are that current shopping centre operations should be maintained with no disruption to the major supermarket leases. This position is flawed economically and should not be supported. It is	<p>Thorough redevelopment and a commitment to revitalise the shopping centre. Thoughtful placement of the major supermarkets to maximise pedestrian traffic to the smaller retailers. Retention of the Library as an important anchor to the site and community asset, and thoughtful direction of foot traffic from the Library to benefit retailers.</p>	<p>We challenge the statement asserted by the APIL Group in their Economic Assessment report that the retailers in the shopping centre are <u>all</u> trading above average. We accept that the two major supermarkets are most likely trading above average due to the lack of other majors in close proximity. However, we strongly doubt that the other retailers are trading above average due to the following observations:</p> <ul style="list-style-type: none"> - Significant tenancy vacancies and smaller retailer turnover have been observed over the last three years in particular. In February 2024 at the

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	<p>very concerning that the APIL Group assumes the Library will be relocated off site and this shows no genuine intent to create a vibrant community hub.</p>		<p>time APIL submitted its PSP, the shopping centre had 14 retail shop vacancies. Priceline is one of the small retailers that has left this year.</p> <ul style="list-style-type: none"> - Restaurant turnover at the northern end of the site is observed to be particularly high and raises concerns about the way in which this location is configured. One restaurant site (previously an Indian restaurant) has been vacant for years and V-Burger recently closed. It is good to see that this area will be addressed through public realm design in this section of the site. <p>The Floreat Forum website currently claims the shopping centre has “80 <i>specialty stores plus Woolworths and Coles</i>” yet only 70 retailers are listed which includes Coles and Woolworths. Of those 70 retailers one has announced it is leaving (Pulp Fiction). So there are 69 retailers from a claimed 82, or 84%. This discrepancy, along with the continued presence of empty stores and further impending closures, raises concerns about the genuine intent of the APIL Group to create a vibrant space that meets the needs of our community.</p> <p>Without significant re-design of the shopping centre itself, we question the long-term viability of smaller retailers which has a direct impact on employment opportunities and in turn this is a key economic driver for this activity centre.</p> <p>We know from other shopping centres that the location of the major supermarkets is critical, as majors help support higher levels of pedestrian traffic to speciality retailers. Increasing the level of activity and pedestrian traffic is critical to improve and sustain the viability of smaller operators. We therefore question why the APIL Group is not proposing to relocate at least one of the major supermarkets to support increased pedestrian traffic throughout the whole centre, and reconsider the general layout to improve pedestrian traffic to the smaller operators.</p> <p>We are also concerned that the APIL Group’s plan assumes that the Town of Cambridge Library will be relocated out of the precinct. The library acts as important anchor in the centre, an important destination and community resource which also contributes to pedestrian traffic to retailers. There is a significant opportunity to optimise the library and Boulevard Centre to further enhance pedestrian movement and help create multi-purpose visits to the activity centre</p>

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			<p>which will only add to its viability and success. The fact that the APIL Group assumes it will be relocated out of the precinct demonstrates they are not focussed on the long-term viability of the smaller retailers in the centre nor the success of the district centre beyond residential dwelling targets. The APIL Group is choosing to ignore the many benefits associated with retaining a community asset in the heart of what should be a community civic centre. We can therefore only assume they are solely focussed on maximising profits through building high-rise towers.</p>
12.	<p>CHARACTER AND AMENITY</p> <p>The impact of the proposal on the local character and amenity is unacceptable and wholly inconsistent with the principles set out in the state planning framework and local planning scheme 1.</p>	<p>Existing shopping centre footprint should be the focus of redevelopment, focussing building height and bulk to the centre of the site to allow for the required gradual integration with the surrounding area in all directions. Building height limits should be aligned with those envisaged in the community supported local planning strategy and state planning policy.</p>	<p>Under the Deemed Provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>, amenity is defined as: "...all those factors which combine to form the character of an area and include the present and likely future amenity". The design has not given due consideration to the prevailing garden suburb character of the locality, in a manner that is sympathetic to its neighbouring parklands and sensitive land uses.</p> <p>The <i>Town of Cambridge Local Planning Scheme No.1</i> zone objectives for a District Centre require it to provide a community focal point for people, services, employment and leisure that are highly accessible and do not adversely impact on adjoining residential areas. For the reasons outlined above and below, it is considered that impacts to the amenity of adjoining residents make APIL Group's proposal inconsistent with the objectives of the district centre zone.</p> <p><i>State Planning Policy 7.2 Precinct Design (2021)</i> Policy Outcome 1: <i>The precinct design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place. New development is integrated into its setting and responds positively to the intended future character of an area.</i></p> <p>The APIL Group PSP is inconsistent with this outcome. It has not sought to integrate development into its setting, it proposes a series of tall towers at the edges of the site and fails to demonstrate how this will be integrated into a redeveloped shopping centre. Not only does it not enhance the distinctive characters of the Floreat Suburb, it will negatively impact them.</p> <p><i>State Planning Policy 7.2 Precinct Design (2021)</i> Policy Outcome 3. <i>Built form height and massing (bulk and scale) across the precinct is responsive to existing</i></p>

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			<p><i>built form, topography, key views and landmarks, and the intended future character of the area. Buildings are suited to their purpose, contribute positively to the character of the public realm, and provide good amenity at ground level.</i></p> <p>The APIL Group PSP is inconsistent with this outcome with its proposed building height and scale significantly inconsistent with existing built form which will negatively impact ground-level amenity and the future character of the area.</p> <p><i>Town of Cambridge's Local Planning Policy 2.3: Precinct P3: Floreat</i> Statement of Intent 2.1 requires new development within the District Centre zone of Floreat Forum to be of a height and scale similar to the existing development within the area. APIL Group's PSPs proposed development scale and height is inconsistent with this statement of intent and is to the detriment of adjacent residential development.</p> <p>Building heights are insensitive to their surrounds and have no site-sensitive response to their frontages to adjoining properties</p> <p>The <i>Town of Cambridge's Local Planning Policy 3.1: Streetscape</i> envisages minimising the visual bulk of new development and ensuring new development is set into the existing landscape to maintain and enhance streetscape amenity. There is the very real potential for the entire western edge of the forum site to be a continuous block of development that will visually unappealing and entirely inconsistent with the existing character and amenity of its surrounds and the broader suburb. This is not site-responsive, inconsistent with the prevailing suburb character.</p> <p>Overdevelopment of the site with residential uses will likely cause a decrease in existing amenity for residents and visitors. This will also make appropriate separation between commercial and residential uses (services, access, parking and waste) problematic.</p>
13.	OVERSHADOWING and OVERLOOKING	Existing shopping centre footprint should be the focus of redevelopment, focussing building height and bulk to the centre of the site to allow for the required gradual integration with the surrounding area and minimising the impact of	The building mass has been concentrated on the northern and southern most extremities of the site where overshadowing and overlooking impacts are maximised.

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	 <p>Winter solstice 9am (from Floreat Forum Masterplan, 10 Principles Summary Report in APIL Group's proposal) shows unacceptable overshadowing of the primary school, civic sporting facilities and houses to the south-west of the precinct. No studies are included that demonstrate the impact of overshadowing in Summer and Spring, which will result in significant overshadowing to the West and East of the precinct. This will directly impact the residential frame to the East which is part of the Activity Centre, and parts of Newry Street and Chandler East potentially. Full solstice studies should be provided demonstrating the full impact. We have serious concerns that this proposal will take away natural light from our</p>	<p>overshadowing and overlooking. Building height limits should be aligned with those envisaged in the community supported local planning strategy and state planning policy (6-8 stories). This will preserve natural light for the primary school, sporting clubs to the west of the precinct and private residential dwellings in the vicinity of the precinct.</p>	<p><i>Residential Design Codes Volume 2 (2024)</i> 3.5 Visual privacy O 3.5.1: states that the orientation and design of buildings, windows and balconies minimises direct overlooking of habitable rooms and private outdoor living areas within the site and of neighbouring properties, while maintaining daylight and solar access, ventilation and the external outlook of habitable rooms. The APIL PSP locates high apartment towers on the extremities of the site which will make it impossible to manage overlooking and the invasion of privacy for neighbouring properties including a primary school and civic sporting facilities.</p> <p><i>State Planning Policy 7.2 Precinct Design Guidelines (2020)</i>, Design Element 6: Built Form requires that buildings should be sited to balance optimum solar orientation for the building with streetscape and character requirements and to limit overlooking, overshadowing and significant amenity impacts on neighbouring properties where required. Providing adequate building separation will allow for daylight and solar access for neighbouring buildings and spaces. Built form envelopes can illustrate how overshadowing of public spaces and nearby development has been considered. The APIL Group PSP will result in building heights that will significantly overlook and overshadow residential areas, a public primary school site and civic sporting facilities (the Cambridge Bowling Club etc) which is unacceptable. This represents an unacceptable loss of existing amenity, natural light and privacy for the community.</p> <p>The <u>solstice study</u> report in the Floreat Forum Masterplan, 10 Principles Summary Report demonstrates that the impact of overshadowing the primary school has <u>not</u> been considered. The report states that it “<i>manages the internal site and the broader precinct</i>”, and whilst the equinox scenario shows that no existing houses are overshadowed during the day by the proposal, it fails to acknowledge that the primary school and the Tennis Club to the west of the site are both overshadowed in the equinox study.</p> <p>In addition, the Winter solstice studies at 9am and 3pm demonstrates that the primary school, civic sporting facilities to the west of the site and private residential houses to the south-west of the precinct will be overshadowed.</p>

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	primary school students, nearby residents and sporting clubs.		<p>It is of great concern that a summer solstice study has not been included in this proposal. In summer, the overshadowing of the primary school and the tennis club to the south-west of the Floreat Activity Centre in the morning and the overshadowing of the residential dwellings to the east will be significant in the late afternoon. It raises concerns about the viability of the development in the residential frame to the east of the shopping centre, if overshadowing and reduction in natural light is not properly and fully assessed.</p> <p>These impacts are a significant oversight in the report. It appears that the primary focus of the report is to assess the impact to the internal site. The impact on the reduction of natural light for the primary school, civic sporting facilities and private residences to the south-west and east cannot be ignored and this must be addressed by reducing building heights to be in line with the local planning strategy and state planning policy.</p>
14.	WIND TUNNEL EFFECT We have significant concerns that wind tunnels will be created through the series of high rise towers proposed by the APIL Group. This is not an acceptable outcome for the community, and not supported by planning principles. Building heights are supposed to control against microclimate impacts, not create them.	The APIL Group must provide a wind tunnel assessment as part of their proposal, and be upfront about the impacts on the microclimate of their proposal. Reducing building heights to those set out in local and state planning frameworks (6-8 stories) will also be important to remove any wind tunnel effect.	<p>APIL Group's proposal does not address whether the 18-20 story towers proposed will create wind tunnels.</p> <p><i>State Planning Policy 7.2 Precinct Design Guidelines (2020)</i>, Design Element 6, c6.2.1 states that building height controls moderate the impacts on the microclimate, impacts such as overshadowing and wind tunnels.</p> <p>Further, it states that developing the appropriate building heights for a precinct requires <u>careful consideration</u> of the potential impact on local amenity including overshadowing and wind tunnel effects.</p> <p>It is of great concern that no consideration has been given to the creation of wind tunnels by virtue of the proposed building heights.</p>
15.	OVERLOOKING OF A PRIMARY SCHOOL	A 20 storey tower that will overlook a primary school must be eliminated and built form opposite a primary school reduced in height to a	20 storey towers that will overlook a primary school must be eliminated and built form opposite a primary school reduced in height to a maximum of 8 stories as per the Local Planning Strategy.

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	<p>Floreat Park Primary School students and the community must have their privacy, security, wellbeing and safety protected. A 20 story tower overlooking the primary school will not achieve this protection and is a wholly unacceptable outcome.</p>	<p>maximum of 8 stories as per the Local Planning Strategy.</p>	<p>Previous attempts to place a mobile phone tower on the shopping centre site was unsuccessful, and set a precedent about appropriate and compatible land uses adjacent to a primary school.</p> <p>Floreat Park Primary School students and the community must have their privacy, security, wellbeing and safety protected. This can be achieved by:</p> <ul style="list-style-type: none"> • altering the position and height of proposed built form to prevent direct overlooking of school spaces. • removing 'primary active edges' interfacing with the school to discourage non-residential uses. • removing 'undesirable' and other potential incompatible land uses such as licensed premises (small bar, hotel), gambling outlets and fast-food outlets adjacent to a school. • Introducing setbacks, green belts/buffer zones adjacent to Floreat Park Primary School. That would be of substantial value to the students, environment and future residents and workers who will reside and work in future developments on the edge of a very busy Howtree Place Road. • Designing a significantly more safer pedestrian crossing that what is proposed in APIL Group's plan, which moves the crossing on Howtree Place further south towards the Boulevard. Thoughtfully considering pedestrian school traffic <p>These changes would then reflect and be in line with comments made in May 2021 by the then Education Minister, Hon Sue Ellery MLC, who condemned overlooking of students in Subiaco East in a Post Newspaper article. Development WA in 2023 also recognised traffic and student safety, student privacy and security concerns when they altered the PMH Design Guidelines in Subiaco East after comments from school stakeholders and the Department of Education.</p> <p>APIL Group has failed to consult school stakeholders including the Floreat Park School Board and Parent and Citizens' Association. This has resultant in a PSP that does not protect nor promote privacy, safety, security and wellbeing of the Floreat Park Primary School students and the community as it provides clear sight</p>

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			lines into and out of school spaces and does not rule out incompatible land uses and active edges adjacent to Floreat Park Primary School.
16.	<p>COMMERCIAL AND RESIDENTIAL CAR PARKING IMPACTS</p> <p>The proposal provides carparking under the amounts prescribed by the Town of Cambridge policy for commercial/retail. And only provides the minimum for residential as contemplated by the R-Codes Vol 2 (page 54). This would be acceptable if public transport was adequately addressed and increased to support the increase in trips to the precinct. Unless the public transport is adequately addressed, carparking levels should be provided at the levels required by the Town of Cambridge and should be above the minimum set out in the R-Codes Vol 2.</p>	<p>Due to poor public transport, carparking should be provided at the rates required for under the Town of Cambridge's policy for commercial/retail and should be provided above the minimum required by the R-Codes Vol 2 for residential. This will minimise the local community being adversely affected by on street parking associated with the development.</p>	<p>Overdevelopment of residential type land uses, in the context of poor and infrequent public transport will generate demand for more carparking. The APIL Group suggests providing carparking at a lower rate as required by the Town of Cambridge's Local Planning Policy 3.13 (5/100 square metre). And only at the minimum required by the R-Codes Vol 2 (page 54). This response is inadequate, as the plan does not adequately address the inadequacy of public transport so it is not acceptable that the community should tolerate lower than expected carparking rates when improved public transport is not contemplated.</p> <p>We understand the principles of reducing carparking for environmental reasons and to provide incentive to increase active non vehicle transport. However - it is an unacceptable response to under cater carparking when there is already inadequate public transport in place, and no train station currently or planned under METRONET, and no proposed improvements to public transport suggested by the APIL Group apart from moving the bus stop locations.</p> <p>The R-Codes Vol 2 ,0 3.9.2 states that carparking provision has to be appropriate to the location, and with reduced provision in areas that are highly walkable, have good public transport, have cycle networks and close to employment centres. We are possibly considered walkable (but not highly), and certainly don't have good public transport or cycle networks and aren't close to any major employment centres.</p> <p>The R-Codes Vol 2, A 3.9.3 states that the maximum residential carparking provision cannot exceed double the minimum number of bays in table 3.9. The APIL Group have only proposed the minimum which is:</p> <ul style="list-style-type: none"> • 0.75 carparks per one BDR apt • 1 carpark per 2 BDR apt • 1 visitor bay per four dwellings up to 12 dwellings

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			<ul style="list-style-type: none"> 1 visitor bay per eight dwellings for the 13th dwelling and above <p>Under the R-Codes, the APIL Group is permitted to provide up to double these numbers of residential carparks. Given the lack of public transport and that we are not close to a major employment centre, carparking should be provided above the minimum. A requirement under the R-Codes Vol 2 is that the local community should not be adversely impacted by on street parking associated with development. This cannot be allowed, therefore the amount of carparking provided must increase.</p>
17.	URBAN HEAT ISLAND & DEEP SOIL/TREE CANOPY The urban heat island created this proposal will not be mitigated through additional deep soil provided by the APIL Group as they are providing the bear minimum of deep soil only of 10%. Not redeveloping the shopping centre is causing a lower contribution of deep soil on that site and it will only contribute 8.7% deep soil.	<p>The APIL Group should be required to provide well over the minimum of deep soil percentage for the Floreat Activity Centre, particularly given the impacts it is causing on the microclimate (urban heat island, overshadowing etc). Redeveloping the shopping centre site should be a priority, to create more deep soil opportunities and therefore tree canopy for the suburb.</p>	<p>Better Urban Forrest Planning for Perth and Peel (WAPC, 2018) states that an Urban Heat Island is created by a concentration of heat absorbing building materials, and that urban trees play an important role in reducing the effects of Urban Heat Island. SPP 7.3 R-Codes Vol 2, 3.3 sets out that the minimum deep soil area to occur within the lot boundary is to be 10% at a minimum. Deep soil is what enables tree canopy to be achieved.</p> <p>The APIL Group state they will achieve a 10% deep soil area, which is the bear minimum as set out in the planning framework. This is unacceptable because:</p> <ol style="list-style-type: none"> 1. the proposed building heights contravene both local and state planning frameworks, amassing significant potential urban heat island impacts that should be mitigated by additional deep soil and therefore tree canopy. 2. The APIL Group is creating other environmental issues such as overshadowing due to the extreme building heights. 3. By not redeveloping the shopping centre site, this lot will only achieve 8.7% deep soil which is well under the minimum required (page 43 Aspect Studio report in the appendix to the proposal). Whilst the whole site is achieving 10%, it does highlight the lost opportunity to create additional deep soil on the shopping centre site. <p>Redeveloping the shopping centre would enable the incorporation of additional open areas which would assist in achieving deep soil opportunities well above the minimum of 10%. The community should not have to accept the deep soil area minimum only, when there are strong economic arguments as to why the</p>

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			shopping centre should be redeveloped, and further that additional deep soil will enable tree canopy to maintain and enhance the garden suburb nature of Floreat.
18.	INFRASTRUCTURE CAPACITY The Service Assessment Report (SAR) which forms part of APIL Group's proposal is not based on the current design proposed for the precinct. It is modelled on projections and assumptions set out in the Local Planning Strategy (LPS), where maximum building heights are 7-8 stories across the Floreat Forum site. It is not modelled on the current proposal which has 7 towers exceeding these heights and reaching up to 20 stories on the site. How can the community and decision makers rely on the report, and therefore the proposal for the site, when it is undermined by fundamental mistakes such as these.	<p>The APIL Group have provided a SAR which is outdated and incorrect, as it is not based on the design that they are proposing in this PSP. An updated SAR must be provided for any precinct structure plan for the site going forwards which is based on the current design.</p>	<p>It is fundamentally flawed that the APIL Group are relying on the Service Assessment Report (SAR) to support their current PSP proposal, when the SAR itself was prepared in 2022 and has not assessed against the 2024 design for the PSP. It has relied on projections and assumptions taken straight out of the LPS which sets maximum building heights for the Floreat Forum site to 7-8 stories. They have included screenshots of the pages from the LPS appendices which set out building heights and housing yields and stipulate maximum building heights of 7-8 stories across the Floreat Forum site. This is unprofessional. The SAR is not based on the current PSP design of 7 towers of up to 20 stories high. How can the community and decision makers rely on this information when it has been prepared not using the correct design?</p> <p>The SAR does refer to upgrade the DN150 sewer. But it makes no mention of who is responsible for that, and we understand this is the responsibility of the developer. Therefore the PSP must propose a development contribution plan upgrade for the upgrade of this sewer.</p>