

**Schedule of Submissions –**  
**Comments from Landowners and Occupiers:**

**Local Development Plan – Belmont Park Racecourse Precinct A**  
**(Town ref: 5.2021.436.1)**

Summary of Submission Types				
Submission Type	Number	Owner/Occupier of Land within ToVP or other LG		
		ToVP	Other	Unknown (not stated)
Objections	7	1	6	-
Support	5	1	4	-
Undecided	2	1	1	-
<b>Total</b>	<b>13</b>	<b>3</b>	<b>11</b>	<b>-</b>

No.	Owner and/or Occupier	Description of Affected Property	Submission Position	Submission Comments	Officer's Comments
1.	Owner/Occupier (CM9 D22/15268)	9 McEvoy Cove MAYLANDS	Support	The planned development integrates with the surrounding and interfacing area and proximity to Perth CBD.	Noted.
2.a)	Occupier No.1 (CM9 D22/15313)	48 Wellington Street EAST PERTH	Objection	The Structure Plan and LDP should include the provision of a primary school site.	The Department of Education has advised that a primary school site may be required if the combined dwelling yield across the Structure Plan area exceeds the 4,500 dwelling limit envisaged in the Structure Plan.

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					Taking into account the existing approved LDP for Precinct D, estimated dwelling yield in Precinct B and proposed dwelling yield in Precinct A, the combined dwelling yield will be below 4,500 dwellings. Should the LDP for Precinct B seek to vary this requirement this matter will be reviewed accordingly.
2.b)	Occupier No.2 (CM9 D22/25163)	48 Wellington Street EAST PERTH	Objection	<ul style="list-style-type: none"> <li>• The Structure Plan and LDP should include provision of a primary school site.</li> <li>• The Townhouse typologies provide for garage dominated streetscapes and should not include triple garages.</li> <li>• The LDP does not meet the Public Open Space required under the Structure Plan and minimum of 10% of subdividable area required under the Western Australian Planning Commission's Development Control Policy 2.3 (DCP2.3). While <i>some</i> flexibility could be considered in the context of the large foreshore reserve areas also being ceded, this flexibility should not be exercised in the context of no sporting grounds being provided for local sports teams. The Department of Sport and Recreation found in a 2013 study that Perth's newer suburbs tend to under-provide in relation to playing fields. That under provision of active open spaces seems to be playing out in the developer's concept plans.</li> <li>• The LDP does not include an Affordable Housing Provision</li> </ul>	<ul style="list-style-type: none"> <li>• Primary school site - refer to the Officer Comment provided in response to Submission 2.a) above.</li> <li>• Garage widths – Due to the width of lots only a few lots will be wide enough to accommodate three car garages. It is noted that the provisions allow for 85% of the frontage of the proposed lots. Noting the building height and street setback requirements it is considered that the provision is reasonable in respect to providing the majority of townhouses with two car garages. This is consistent with the minimum requirement for car parking under the Residential Design Codes.</li> <li>• Public Open Space (POS) – The LDP has been modified to remove reference to the amount of POS to be provided. It is noted that the WAPC is the responsible authority for the determination of this matter. Notwithstanding this, the Town's Officers and Design Review Panel are generally supportive of the proposed POS as indicated on the LDP. In relation to the provision of a sporting grounds, it is noted that none of the POS areas depicted in Figure __ of the Structure Plan are of a sufficient size to accommodate a playing field.</li> <li>• Affordable Housing – Following the outcome of community consultation the applicant submitted an amended LDP which includes a suitable</li> </ul>

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					Affordable Housing provision.
3.	Owner/Occupier (CM9 D22/15318)	6/146-148 Joel Terrace MT LAWLEY	Objection	High density and high-rise structures will negatively impact the river environment and visual amenity of the skyline as viewed from East Perth and Maylands.	Following the outcome of community consultation, the applicant submitted an amended LDP. In order to address potential overshadowing impacts on the racecourse function, the amended LDP has removed all apartment lots from the North Park area. It is noted that the building height higher than the maximum of 13 storeys envisaged under the Structure Plan, however, the Town's Officers and Design Review Panel are supportive of the proposed building heights on the basis that the proposed built form will integrate with surrounding future development in Precinct B and Precinct D.
4.	Owner/Occupier (CM9 D22/16416)	33 Joel Terrace EAST PERTH	No position stated	The Structure Plan and LDP should include the provision of a primary school site.	Refer to the Officer Comment provided in response to Submission 2.a) above.
5.	Owner/Occupier (CM9 D22/17284)	19 Kirkham Hill Terrace MAYLANDS	Support	Supportive of the implementation of the LDP.	Noted.
6.	Owner/Occupier (CM9 D22/18502)	4/165 Edward Street OSBORNE PARK	Support, with comments	Additional resident and visitor access should be provided to the river foreshore. A marina area would be beneficial. A community watercraft storage facility should be provided at the canoe launching beach.	Noted. The Town's Officers and Design Review Panel are supportive of the treatment of the activity node as proposed in the LDP. It is envisaged that further community facilities will be provided in adjoining Precinct B.
7.	Owner/Occupier (CM9 D22/18503)	14/146 Joel Terrace MT LAWLEY	Objection	High density and high-rise structures will negatively impact the river environment and visual amenity of the skyline as viewed from East Perth and Maylands. An additional perspective should be included in the document to demonstrate the visual impact.	Refer to the Officer Comment provided in response to Submission 3. above.
8.	Owner	130A Joel Terrace MT LAWLEY	Support, with comments	No issue with the redevelopment in general. No issues with 2-3 storey townhouses. 19-storey high-	Refer to the Officer Comment provided in response to Submission 3. above.

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	D22/18505			rise structures will negatively impact the river environment and visual amenity of the skyline as viewed from East Perth and Maylands.	
9.	Occupier  (CM9 D22/18751 & D22/19133)	5 Plomarion Rise VICTORIA PARK	Objection	The proposal does not plan for climate change including: <ul style="list-style-type: none"> <li>• Flooding within the Swan River floodplain.</li> <li>• Renewable Energy and Sustainable Development - '4-star' Greenstar rating is not sufficient. A minimum '6-star' should be provided.</li> </ul>	<ul style="list-style-type: none"> <li>• Flooding within the Swan River floodplain – the proposed finished floor levels meet current requirements.</li> <li>• Renewable Energy and Sustainable Development – following the outcome of community consultation the applicant submitted an amended LDP containing a modified Environmental Sustainable Design provision requiring a naTHERs energy rating for residential homes.</li> </ul>
10.	Owner/Occupier  (CM9 D22/23072)	26/23 Kirkham Hill Terrace MAYLANDS	Objection	<ul style="list-style-type: none"> <li>• The development will negatively impact the river environment.</li> <li>• The development will increase noise in the area.</li> </ul>	<ul style="list-style-type: none"> <li>• Environment - Refer to the Officer Comment provided in response to Submission 3. above.</li> <li>• Noise – It is noted that the development will result in the increase of noise emissions in the area.</li> </ul>
11.	Owner/Occupier  (CM9 D22/23375 & D22/23921)	16 Kennerly Street CLOVERDALE	Objection	<ul style="list-style-type: none"> <li>• Dwelling diversity – Townhouses are design for families and not singles or couples. Racecourse lots are designed for both singles and families.</li> <li>• Precinct A location – How can all of Precent A all be described as just the northern most portion as this distance covers more than just the northern most portion of Belmont Racecourse redevelopment or land area.</li> <li>• Alternative modes of transport - Within stage A1 development is there any proposed non car community access to and from their properties as some residents may not drive or be able to walk long distances to the nearest transport facilities that are currently available.</li> <li>• What are the sewerage disposal arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>• Dwelling diversity – Noted.</li> <li>• Precinct A location – Noted.</li> <li>• Alternative modes of transport – A principle shared path will be located in the river foreshore and the road network has been designed to accommodate a future Transperth bus service will be provided in the future.</li> <li>• Sewerage disposal – New Water Corporation infrastructure will be installed.</li> <li>• Flooding – Refer to the Officer Comment provided in response to Submission 9. above.</li> <li>• Commercial development – The Town's Officers are not sure what this comment relates to.</li> <li>• Treatment of public open space – The LDP proposes various public realm treatments</li> </ul>

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				<ul style="list-style-type: none"> <li>• Flooding along the Swan River floodplain.</li> <li>• Commercial development – Within the descriptive A1 present what would occur if these locations are not utilised for potential commercial purposes ?.</li> <li>• Treatment of public open space - Within the open spaces for genuine community is there proposal to have made available public seating arrangements, toilets and open cooking facilities for these community expectations included within this development.</li> <li>• Development boundary - Does it commence from the water boundary from the river.</li> <li>• Further consultation should be undertaken for the high-rise developments.</li> <li>• What does the term performance-based mean?</li> <li>• Compliance with Obstacle Limitation Surface associated with Perth Airport.</li> </ul>	<p>including seating, lawn areas and BBQs.</p> <ul style="list-style-type: none"> <li>• Development boundary – refer to Plan 1.</li> <li>• Performance based term - The Town's Officers are not sure what this comment relates to.</li> <li>• Building heights – The apartment buildings will be required to comply with the Obstacle Limitation Surface associated with Perth Airport.</li> </ul>
12.	Operator of Optus Stadium  (CM9 D22/23069)	Optus Stadium	I'm unsure	<ul style="list-style-type: none"> <li>• Traffic generation - Traffic management needs to consider events at the stadium.</li> <li>• Parking management – How does the Parking Management Plan support ongoing operations and manage the expectations of new residents in the area on event days.</li> <li>• Public transport - How will adequate access to public transport be provided?</li> <li>• Noise - What requirements will be placed on the developer to ensure properties are properly sound proofed to minimise the impact from established event programming from Optus Stadium?</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic generation – The Town's Officers are supportive of the submitted Traffic Impact Assessment.</li> <li>• Parking management - The Town's Officers are supportive of the submitted Parking Management Plan.</li> <li>• Public transport – The road network has been designed to accommodate a future Transperth bus service will be provided in the future.</li> <li>• Noise – The applicant has submitted an amended LDP that contains adequate Noise Consideration provisions.</li> </ul>
13.	Owner/Occupier	Belmont Park	Support	<ul style="list-style-type: none"> <li>• The development does not integrate with the</li> </ul>	<ul style="list-style-type: none"> <li>• Integration with the racecourse - following the</li> </ul>

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	(CM9 D22/22203)	Racecourse		<p>racecourse and development may impact on the operation of the racecourse in respect to lighting, noise and designation of car parking infrastructure. The Draft LDP lacks specific built form controls for the screening of car parking, service compounds and blank walls for lots adjacent to the race track.</p> <ul style="list-style-type: none"> <li>The Draft LDP lacks consideration with respect to new drainage requirements to facilitate development within 'Precinct A'.</li> </ul>	<p>outcome of the consultation the applicant submitted an amended LDP addressing these concerns. Of note, apartment lots were removed from the North Park area. Additional provisions were included to control treatment of development facing the racecourse.</p> <ul style="list-style-type: none"> <li>Drainage – The Town's Officers are supportive of the proposed servicing arrangements, noting that further design details will be provided a future subdivision and/or development stages.</li> </ul>