

Our Ref: 21-311

12 December 2022

Chief Executive Officer
Town of Victoria Park
99 Shepparton Road
VICTORIA PARK WA 6100

Attention: Mr Robert Cruickshank – Manager Development Services

Dear Robert,

APPLICATION FOR PLANNING APPROVAL – TEMPORARY ALTERATIONS TO VICTORIA PARK TRAIN STATION

element is pleased to submit the following submission on behalf of the Armadale Line Upgrade Alliance (ALUA) to support a Development Application (DA) for alterations to the Victoria Park Train Station to accommodate a temporary bus interchange and associated displaced staff and passenger car parking. This letter provides an overview of the subject site, the proposed works and an assessment of the proposal against the applicable planning framework.

In accordance with the requirements for the lodgement of a public works development application, please find enclosed the following information:

- A completed MRS Form 1 – Application for Planning Approval;
- Landowner consent; and
- Scaled development plans.

This application relates to temporary works to Victoria Park Train Station, as part of the delivery of the Victoria Park-Canning Level Crossing Removal project (VPCLXR). It is one of six (6) different development applications that are being progressed in relation to the VPCLXR project. The other five (5) development applications that form a part of the VPCLXR project are shown in the diagram at Figure 1 below.

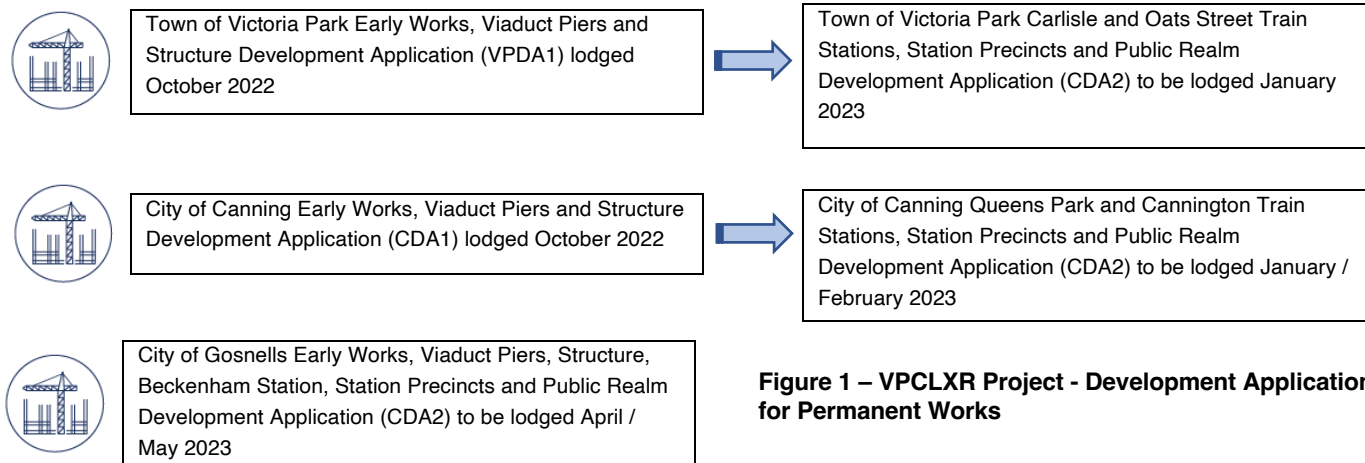


Figure 1 – VPCLXR Project - Development Applications for Permanent Works

ALUA has been appointed to deliver the VPCLXR project on behalf of the Office of Major Transport Infrastructure Delivery (OMTID) and the rail operator, the Public Transport Authority of Western Australia (PTA).

ALUA is a body that falls within the definition of ‘public authority’ in section 4 of the *Planning and Development Act 2005* (PD Act) as ALUA is a private corporation undertaking a public work as part of a private-public sector partnership with OMTID under a contract with the PTA.

Public works are defined by the *Public Works Act 1902* (PW Act). The definition of public works includes:

(b) any railway authorised by special Act or any work whatsoever authorised by any Act;

In relation to the public works definition under the PW Act set out above, the *Railway (METRONET) Act 2018* (METRONET Act) is the ‘special Act’ that is the key enabling legislation for the VPCLXR project.

Accordingly, the proposed works for the VPCLXR project are considered to be public works under section 6 of the PD Act.

Section 6 of the PD Act states:

"nothing in this Act interferes with the right of the Crown, or the Governor, or the Government of the state, or a local government -

(a) to undertake, construct or provide any public work; and

(b) to take land for the purposes of that public work."

In general terms, this section gives the bodies referred to in section 6, ‘section 6 bodies’, the power to undertake a public work or take land for the purposes of a public work without obtaining planning approval from the responsible authority under the relevant planning scheme. However, in doing so section 6 bodies must comply with the requirements of section 6(2) and (3) of the PD Act by having due regard to:

“(a) the purpose and intent of any planning scheme that has effect in the locality where, and at the time when, the right is exercised; and

(b) the orderly and proper planning, and the preservation of the amenity, of that locality at that time; and

(c) any advice provided by the responsible authority in the course of the consultation required under subsection (3) in respect of the exercise of the right. “

If a section 6 body undertakes a public work without consulting the relevant responsible authority, then it has breached the requirements of the PD Act.

The Metropolitan Region Scheme (MRS) may under certain circumstances require section 6 bodies (except local governments) to apply for approval to commence development, including public works, because the MRS binds the Crown. Given that the proposed temporary works relate to the car parking areas at the Victoria Park Train Station and involve the provision of a new temporary bus interchange facility, the proposed works do not meet the definition of ‘permitted development’ under the MRS and therefore do not meet the requirements for an exemption from planning approval under the MRS.

‘Permitted Development’ under the MRS is defined as:

(d) works on land reserved for Railways for the purpose of or in connection with a railway, but this does not include the construction or alteration of a railway station or any related car parks, public transport interchange facilities, or associated means of pedestrian or vehicular access;

Where public works require planning approval under the MRS and are on a region planning scheme reserve, as is the case for this proposed temporary bus interchange and temporary park and ride facility, the responsible authority for determining the development application is the Western Australian Planning Commission (WAPC).

Site Details

The proposed works are contained within the MRS Railways Reserve generally in the area south of Duncan Street and north of Gresham Street. All works are located on the Kitchener Road (western) side of the existing rail line within the MRS Railways Reserve.

The subject site currently contains the Victoria Park Train Station park and ride car parking area and associated pedestrian pathways and landscaping. The area immediately south of the park and ride car parking area is fenced undeveloped land containing scattered trees.

The existing park and ride car parking station comprises 36 car parking bays and four Transperth staff parking bays.

The area surrounding the subject site is characterised by single and two storey residential development of low to medium density on both the western and eastern sides of the rail corridor.

Refer to Figures 2, 3 and 4 – Location Plan, Site Plan and Aerial Plan

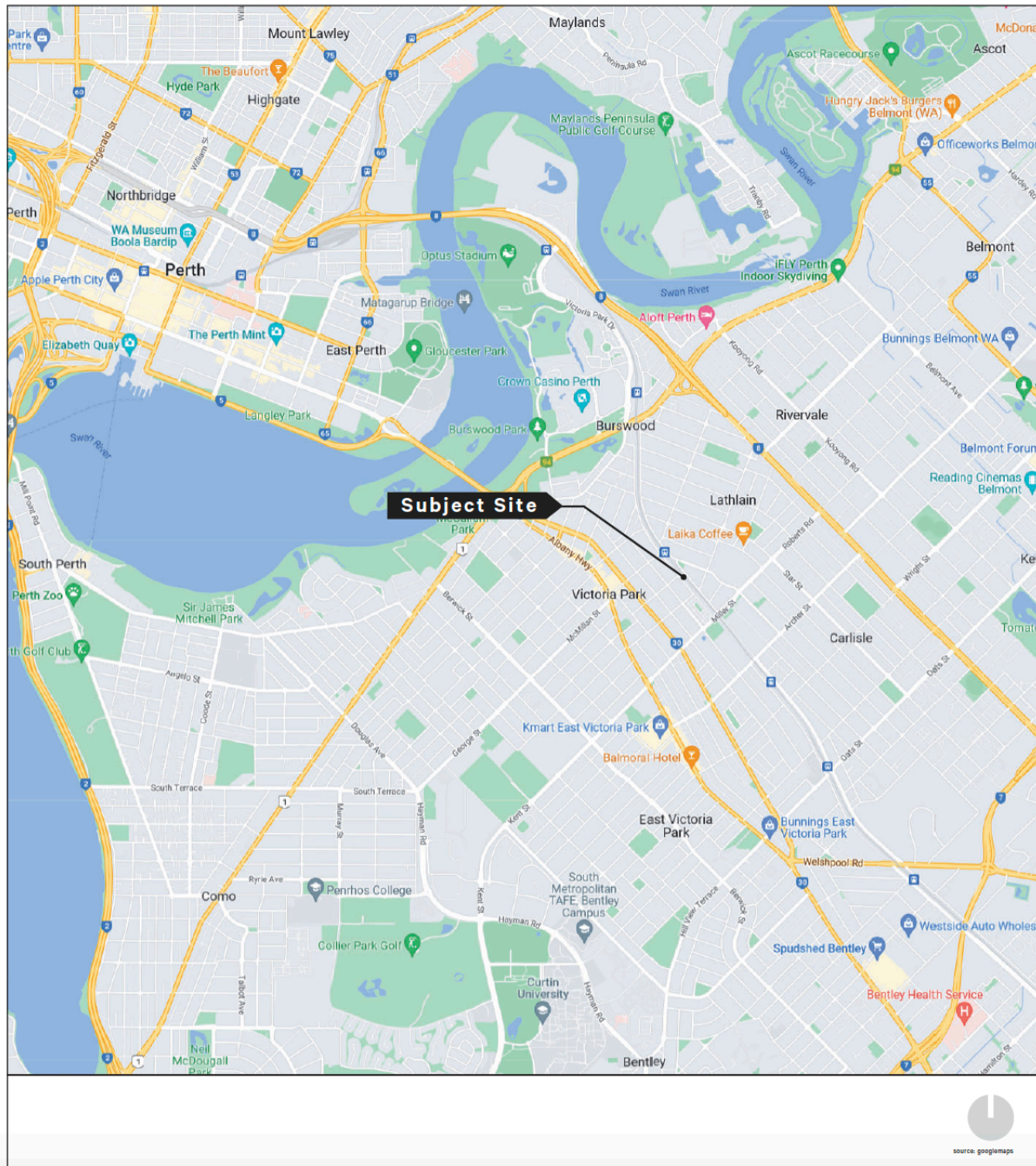


Figure 2 – Location Plan

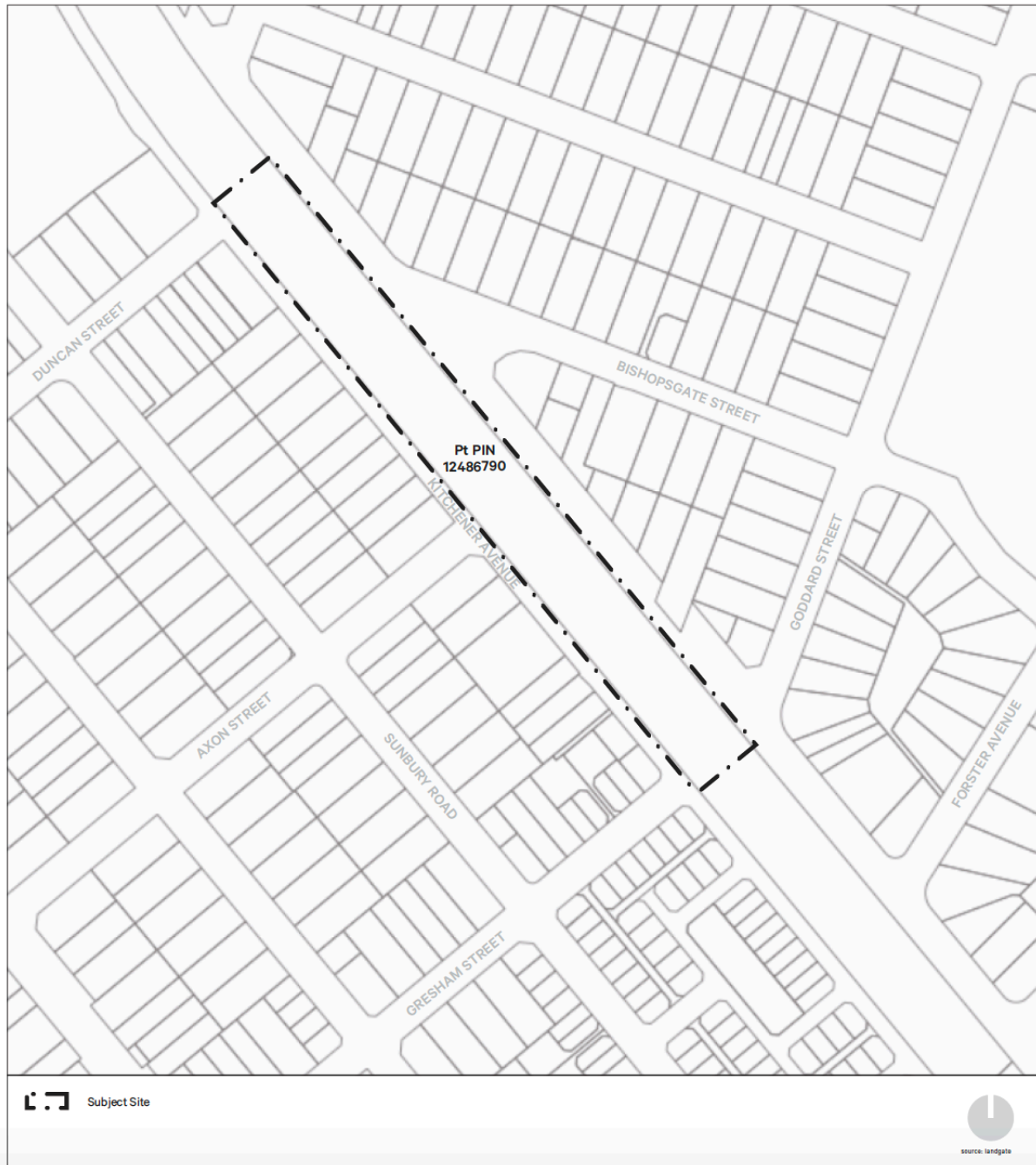


Figure 3 –Site Plan



Figure 4 – Aerial Plan

Environmental and Heritage Considerations

A desktop search indicates that the subject site:

- Has no known local, State, national or Aboriginal heritage significance;
- Is not located within an identified bushfire prone area under the State Map of Bush Fire Prone Areas;
- Has a moderate to low risk of acid sulphate soils; and
- Has no history of contamination.

Proposed Development

This application relates to temporary works to Victoria Park Train Station, as part of the VPCLXR project. The VPCLXR project is Perth's first major elevated rail line that will improve public transport safety, reduce traffic congestion and create new publicly accessible spaces for ongoing use by the community within the existing rail corridor.

The works required to complete the VPCLXR project necessitate the shutdown of the Armadale Rail Line for an estimated 18 month period. This application seeks approval for temporary works to the Victoria Park Train Station to accommodate a temporary bus interchange, which will provide access to public transport services during the shutdown period. A new temporary park and ride facility is also proposed to be constructed to replace the existing car parking spaces displaced by the temporary bus interchange.

The details of the project include:

- Two new crossovers proposed for vehicle entry and exit to the temporary bus interchange, with entry from Duncan Street and exit onto Kitchener Avenue. The temporary bus interchange is to be located within the area currently utilised as the Victoria Park Train Station 'Park and Ride' car parking area.
- Two new crossovers proposed to provide vehicle entry and exit to the temporary park and ride car parking area, which is to be located immediately south of the existing park and ride car parking area.
- The new crossover to provide entry from Duncan Street necessitates alterations to existing traffic signals in this location. It is also likely to result in some changes to signal phasing. ALUA has been in discussions with Main Roads WA regarding these changes.
- The temporary park and ride car parking area is proposed to accommodate a total of 42 new car parking bays including: 37 new Park and Ride car parking bays (including two (2) disabled parking bays), five (5) Kiss and Ride car parking bays and the balance (9 bays) for Transperth use. The 37 new Park and Ride car parking bays and the five (5) Kiss and Ride parking bays replace the existing Park and Ride and Kiss and Ride Parking bays on a 1:1 ratio. The proposed replacement ratio has been determined by Transperth. There is not anticipated to be any change in the demand for car parking at the Victoria Park Train Station on the basis of the replacement bus services being provided elsewhere in the network during the shutdown period.
- Three (3) temporary, transportable buildings proposed to accommodate a staff crib room, staff toilets and public toilets.
- Security fencing between Kitchener Avenue and the rail corridor is proposed to be modified to accommodate the layout changes to the parking areas.
- Vegetation is proposed to be removed to accommodate the temporary car parking area and crossovers.
- Temporary lighting is proposed within the proposed temporary park and ride car park.
- Existing drainage is proposed to remain within the temporary bus interchange facility.
- No new temporary drainage measures are proposed to the new temporary park and ride area, however the temporary car park will be graded to facilitate water sheeting back towards the rail corridor.
- No widening or modifications to the kerbing are proposed, other than to accommodate the new and/or modified crossovers.
- A temporary localised adjustment may be needed to the existing raised median at the intersection of Kitchener Avenue and Gresham Street to facilitate bus movements (if Gresham is to be used by buses). At this stage Transperth's preferred exist route is via Axon

Street rather than Gresham Street.

From a staging perspective, the temporary car parking area will be completed first to allow this to be operational and utilised whilst the works occur to create the temporary bus interchange. Accordingly, there will be no interruption to the availability of Park and Ride and Kiss and Ride car parking at the Victoria Park Train Station as a result of this development.

The proposed development will generally only be in use for the duration of the shutdown period (anticipated to be 18 months). The only exception to this is for a four week period prior to the shutdown period commencing, when Transperth will commence training drivers in using the temporary bus interchange facility.

After the shutdown period, the works will be decommissioned (including any local road median / kerb changes) and the subject site reinstated to its currently existing condition. It is anticipated that the decommissioning process will occur during a period of three (3) to six (6) months following the cessation of the use.

Refer to Figure 5 – Proposed Site Plan

Refer to Appendix A – Development Plans



Figure 5 – Proposed Site Plan

Proposed Operation

Whilst Transperth is yet to determine the final bus routes and quantum of buses that will utilise the temporary interchange, ALUA is currently advised that at this stage Transperth anticipates that Bus Route No.908 will be the only route using this interchange. These buses are anticipated to run every 7-8 minutes. ALUA also understands that patronage will be monitored during the shut down period and services may be reduced, depending on levels of patronage.

Proposed Communications Strategy

ALUA has a dedicated communications team who will implement appropriate measures to ensure that all local residents who reside in close proximity to the proposed works are notified regarding:

- The commencement and duration of site works;
- The commencement and duration of use of the temporary facilities; and
- Contact details for complaints management.

Planning Framework and Assessment

Metropolitan Region Scheme

The subject site is reserved as 'Railways Reserve' under the MRS.

As mentioned above, the MRS ordinarily exempts all work proposed within a railway reserve from the requirement for planning approval, however as the proposed works relate to a train station and public car park, the works do not meet the definition of 'permitted development' and planning approval is required from the WAPC.

Refer to Figure 6 – Extract of Metropolitan Region Scheme

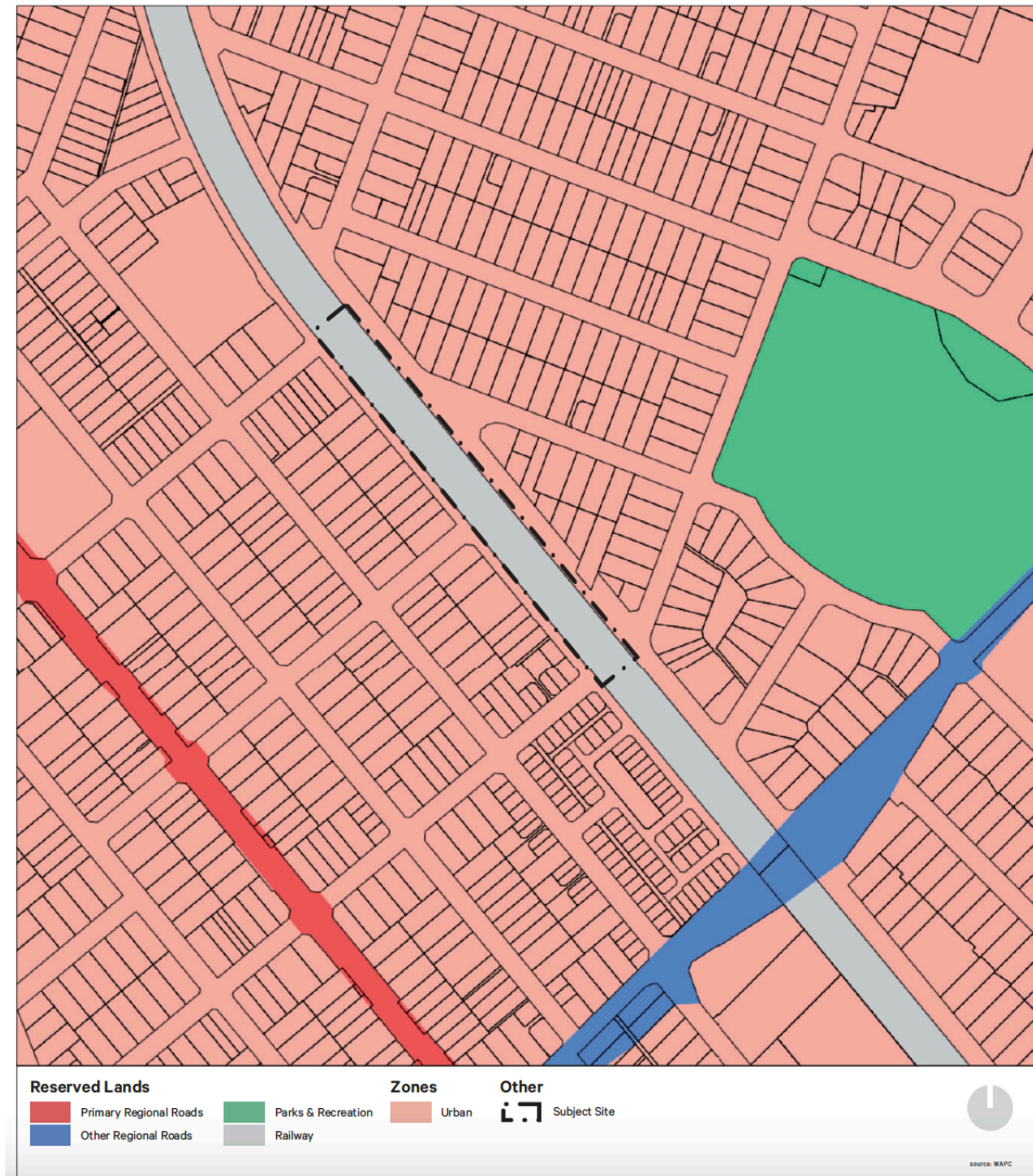


Figure 6 – Extract of Metropolitan Region Scheme

Town of Victoria Park Local Planning Scheme No. 1

The Town of Victoria Park (the Town) Local Planning Scheme No. 1 (LPS 1) represents the primary local government statutory planning control mechanism for the development and use of land within its local government area. Due to the subject site being reserved under the MRS, it is not zoned under LPS 1. LPS 1 sets out the zonings and local reserve purposes for the land immediately adjacent to the subject site, the majority of which is zoned 'Residential'.

As noted previously in this report, ALUA is acting on behalf of the PTA, with the proposed works qualifying as public works being undertaken on behalf of a public authority. The proposed works are therefore exempt from the requirement to obtain planning approval from the Town under the provisions of LPS 1.

Importantly the proposed works are consistent with the purposes for which the land is reserved under the MRS (Railways Reservation) and to the extent they are directly relevant, are also consistent with the aims of LPS 1.

Refer to Figure 7 – Extract of LPS1 Zoning Plan

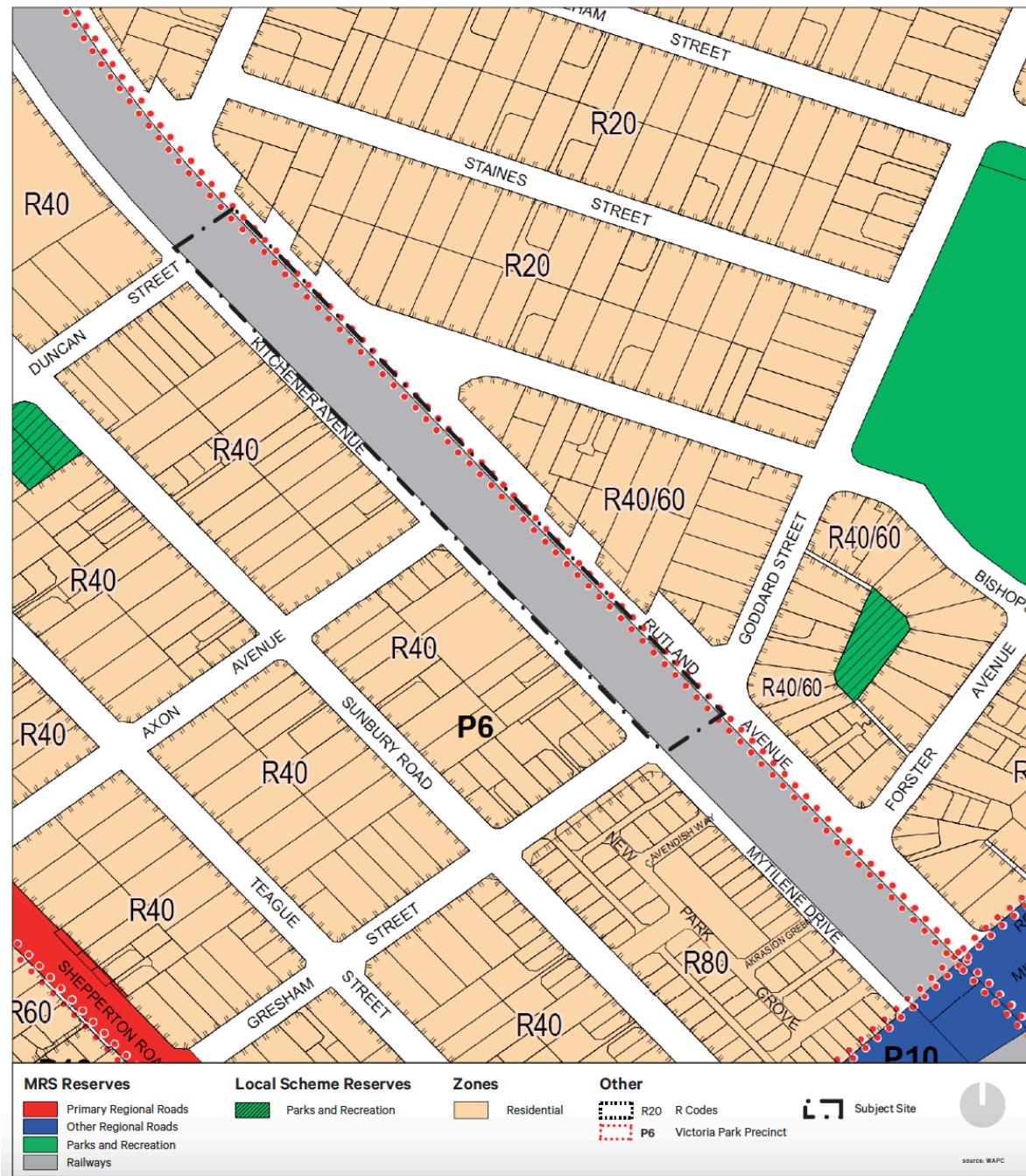


Figure 7 – Extract of LPS1 Zoning Plan

Planning Control Area

A PCA (PCA No.165) was declared over parts of the VPCLXR project area in June 2022. PCA No.165 includes the full length of the section of viaduct located generally from abutment to abutment, including all new train stations and the associated station precinct land which sits underneath the elevated rail line. Whilst the other development applications for the VPCLXR project are being determined under the PCA provisions, this project is located outside of the PCA project area, and therefore the development application will require determination by the WAPC under the MRS.

Railway (METRONET) Act 2018

The METRONET Act provides that 'METRONET works' can be carried out without the approval of the WAPC. METRONET works are defined as:

works for the purpose of, or in connection with, a METRONET railway but does not include

the construction or alteration of a railway station, or any related car parks, public transport interchange facilities or associated means of pedestrian or vehicular access.

Given that this application involves works to car parking facilities and to provide a temporary bus interchange facility within the existing Victoria Park Train Station car parking area, the works do not qualify as METRONET works, and therefore require approval from the WAPC.

State Planning Policy 5.4 Road and Rail Noise

The purpose of State Planning Policy 5.4 Road and Rail Noise (SPP 5.4) is to minimise the adverse impact of road and rail noise on noise-sensitive land-use and/or development within the specified trigger distance of strategic freight and major traffic routes and other significant freight and traffic routes.

This application seeks temporary modifications to the existing Victoria Park Train Station parking areas to facilitate a temporary bus interchange within the rail corridor. As the proposed works do not; involve a noise sensitive use, new or major upgrades to roads, comprise a new or major upgrade to a railway or result increased in railway capacity or storage, SPP 5.4 is not considered to be relevant to this application.

Town of Victoria Park Local Planning Policy 23 Parking Policy

The Town's Local Planning Policy 23 - Parking Policy (LPP 23) has been designed to facilitate the development of adequate parking facilities and safe, convenient and efficient vehicle and bicycle access for pedestrians, cyclists and motorists.

The proposed development has been assessed against the relevant provisions of LPP 23 in Table 1 below:

Table 1: Parking Assessment

Provision	Comment	Compliance
6.9 Access		
<i>Vehicular access points to parking areas shall be located and designed so that:</i> <i>i. entry/exit points minimise: traffic or pedestrian hazards, conflict with pedestrian/cyclist pathways, the impact on nearby residential uses, traffic congestion and interference with public transport facilities;</i> <i>ii. the number of entry/exit points is kept to a minimum. Where possible, new parking areas and vehicular access points shall be linked to existing parking facilities; and</i> <i>iii. access is obtained away from major traffic streets where possible, but not if this necessitates access from a residential street where undue disturbance to residential amenity would result.</i>	<p>The development proposes new entry/exit points for the temporary bus interchange and replacement park and ride car parking area.</p> <p>Additional traffic control signs will be installed to provide wayfinding signage for drivers and pedestrians using the space.</p> <p>The temporary bus interchange proposes to utilise the existing car park area with an additional parking area proposed to accommodate for the loss of existing park and ride bays.</p> <p>The access points have been located away from existing intersections, with the exception of the Duncan Street and Kitchener Avenue intersection, which is controlled with traffic lights.</p>	Complies
6.10 Traffic Movement		
<i>The Council will require traffic circulation and manoeuvring spaces</i>	The development has been designed to provide sufficient space for vehicle	Complies

<p><i>within parking areas to be designed so that:</i></p> <ul style="list-style-type: none"> <i>i. adequate provision should be made to enable all vehicles to enter and leave the land in a forward direction where the Council believes that the nature of a development, its relation to adjoining streets or the nature of those streets makes it necessary to do so, and an access point from parking spaces to the street serves more than two spaces;</i> <i>ii. vehicles are able to queue, if necessary, within the parking area and not on the street; and</i> <i>iii. parking areas are not used as traffic thoroughfares to facilities that they do not serve.</i> 	<p>manoeuvrability to allow all vehicles to enter and exit in forward gear.</p> <p>Vehicles will be able to queue within the parking areas where necessary.</p> <p>The proposed replacement car parking area will not be used as a traffic thoroughfare as it runs parallel to Kitchener Avenue and does not provide access to another road or other facility.</p>	
6.11 Safety		
<p><i>The Council will expect pedestrian, cyclist and motorist safety to be a priority in the design and operation of parking facilities, ensuring that:</i></p> <ul style="list-style-type: none"> <i>i. pedestrian pathways through a parking area are clearly defined, well lit and signposted, where required, with direct access to the street or facilities served;</i> <i>ii. traffic access to, and circulation within parking areas, is separated, where practicable, pedestrian and cyclist paths or pedestrian access points to or through a parking area; and</i> <i>iii. driver sight lines are not obstructed by signs, fencing or any other obstacle.</i> 	<p>Additional traffic control signs will be installed to provide wayfinding signage for drivers and pedestrians using the space. The details of these signs are not currently known.</p> <p>A footpath is proposed between Kitchener Avenue and the development to provide safe pedestrian access throughout the site.</p> <p>Temporary lighting is proposed within the proposed temporary park and ride car park.</p> <p>Sightlines from the new entry and exit points will be unobscured and the existing security fencing will be modified to accommodate the proposed temporary changes.</p>	Complies
6.12 Parking Facilities - The following matters shall be taken into consideration in the design and construction of parking facilities:		
Design:		
<p>Innovative approaches to the design of parking areas is expected in order to maintain amenity and encourage the use of parking areas for community activities in addition to parking, such as weekend markets, fairs, sporting activities and other entertainment activities.</p>	<p>The proposed development has been designed to be contained within the rail corridor and have a minimal impact on the existing amenity of the locality.</p> <p>The nature of the use of the parking facilities in association with the temporary bus interchange means that they are not suitable for use for community activities.</p>	Complies

	The proposed development will generally only be in use for the duration of the shutdown period (anticipated to be 18 months). After this time, the works will be decommissioned and the subject site reinstated to its prior condition. It is anticipated that the decommissioning process will occur during a period of three (3) to six (6) months following the cessation of the use.	
Where multi-storey parking facilities are proposed they should: <ul style="list-style-type: none"> i. complement the surrounding built form, in terms of scale, height and character (built form development standards as specified in the precinct plans will apply); and ii. here they front the street should contain activities such as shops or similar uses to maintain pedestrian interest and activity at street level. 	No multi-storey parking facilities are proposed.	N/A
Private off-street parking should generally be located at the rear of developments, and in some precincts beneath. All parking areas must be paved and landscaped to a high standard, and in particular, surface (open-air) parking areas fronting a street should be landscaped or treated in other suitable ways to maintain to a high visual standard of development.	<p>No private off-street parking is proposed.</p> <p>The proposed parking area will be constructed using pavement that is to be removed at the end of the temporary use period.</p> <p>No additional landscaping is proposed as the development is temporary in nature.</p>	Complies
Where lighting is provided in parking areas the lights should not have a detrimental impact on adjoining residential uses, and should not be reduced in effectiveness due to overgrown vegetation or poor placement.	Temporary lighting is proposed within the proposed temporary park and ride car park. Lighting will be baffled as needed to prevent light spill to residential neighbours.	
Large expanses of parking area should be avoided. Parking areas should be detached, into smaller groups of bays, separated by landscaping or other uses or activities, especially where these areas front the street.	The proposed parking area is relatively small and has been designed to have minimal impact. It will be separated from Kitchener Avenue by a verge area.	Complies
Landscaping		
<i>All non-residential parking areas should contain shade trees (species to be approved by the Council) generally at a rate of one tree for every four bays.</i>	<p>No landscaping is proposed as part of this application as the proposed development is temporary in nature.</p> <p>Existing landscaping will be maintained where possible. Some trees within the rail reserve will need to be removed to accommodate the development.</p>	Variation proposed

	A small number of bottlebrush shrubs within the Town's verge between Kitchener Avenue and the rail corridor are required to be removed to accommodate the amended entry and exit crossovers.	
<i>In residential areas any continuous row of parking or length of driveway shall be provided with planting areas, including shade trees, at the rate of one per eight bays or otherwise required by the Council.</i>	N/A	N/A
<i>The perimeter of all parking areas should be landscaped by a planting strip of at least 1.5 metres in width. In some circumstances a greater area of landscaping may be required, particularly where a parking area adjoins a residential property, an area of parkland or an open air recreation area.</i>	No landscaping is proposed as part of this application given the temporary nature of the proposed new car park.	Variation proposed
Signs		
<i>Signs in parking facilities should be for the purpose of providing information on parking operations and access. Signs should not obstruct pedestrian thoroughfares or driver vision.</i>	<p>No signage of this type is included as part of this application, however Transperth will be installing car parking information signage and bus stop signs and info cubes as necessary, which will be contained within the bus interchange area and temporary car parking area. The details of these signs are not currently known but will meet the requirements to only be about operations and access. They will not obstruct thoroughfares or driver vision.</p> <p>ALUA will also be designing and installing traffic control signs to meet required Main Roads WA standards.</p>	
Adjoining Development		
<p><i>When considering the development of parking facilities the Council will take into consideration:</i></p> <ul style="list-style-type: none"> <i>i. the location of parking spaces and structures, lights and signs on the site and their affect on the amenities of adjoining development, including the potential affect if parking spaces should later be roofed or covered; and</i> <i>ii. the extent to which parking spaces are located within required building setback areas and the resulting visual impact on adjoining</i> 	<p>The development has been designed to utilise the existing parking area for the temporary bus interchange and the new parking area has been designed to match the existing infrastructure for continuity and minimal impact on the streetscape.</p> <p>The proposed bays have been appropriately setback a minimum of two (2) metres from Kitchener Avenue.</p> <p>A footpath will be located between the bays and the street to provide safe pedestrian access for users of the facility.</p>	Complies

<i>properties.</i>		
Layout and Dimensions <i>Generally car parking spaces shall be in accordance with the dimensions and layout outlined in Appendix A and B.</i>		
a) <i>The owner and occupier of parking facilities shall ensure that parking areas are operated, laid out, constructed and maintained in accordance with the development approval for the site, and are clearly marked at all times to the satisfaction of the Council. Landscaping, in particular, should be maintained to a high standard. This may include the marking of bays exclusively for residential dwellings, staff, visitors, service vehicles, etc.</i>	The temporary bus interchange and new car parking area will be laid out, constructed and clearly marked prior to use. Transperth will be responsible for the operations within the temporary bus interchange and new car parking area.	
b) <i>Enter and exit points and vehicle circulation patterns should be clearly indicated.</i>	Transperth will be installing bus stop signs and info cubes as necessary which will be inside the temporary bus interchange. ALUA will also be designing and installing traffic control signs to meet required Main Roads WA standards.	Complies
7.1 Occasional Parking		
<i>The Council may support the use of land or buildings for occasional parking facilities in the case of special events or circumstances relating to a particular or regular use of a site. Council approval, however, will be required and special conditions of approval may apply.</i>	The proposed development is intended to be used by patrons of the temporary bus interchange only.	Complies
7.2 Vacant Land		
<i>The Council does not support the use of vacant land or buildings for parking purposes unless occasional parking, as outlined in the above provision, has been approved.</i>	The proposed temporary bus interchange is proposed within an existing car parking area that provides parking for the Victoria Park Train Station. An additional car park will be installed to offset the loss of these bays and facilitate the use of buses during the 18 month operation of the development.	Complies
7.3 Activities Or Uses Within Parking Areas		
<i>Private parking areas should not be used for any other purpose or activity other than for parking vehicles, motorcycles and bicycles associated with the approved use for the site. The Council will not support the use of such parking areas for activities which have not been approved for the site, or the use of parking areas to carry out activities approved and intended to be conducted in buildings on the site.</i>	The development is to be used by Transperth patrons and accessed by members of the public.	Complies

<i>The Council may consider permitting the use of parking areas for weekend markets or other similar community activities or entertainment.</i>	The nature of the use of the parking facilities in association with the temporary bus interchange, including on weekends, means that they are not suitable for use for community activities.	N/A
7.4 Kerbside Parking		
Kerbside parking cannot be used to satisfy the parking requirements of a commercial or a residential development unless the Council is satisfied that parking demand can be met. The Council may also consider the parking requirement to be satisfied by kerbside parking bays where the provision of off-street parking would be detrimental to the amenity of the area or incompatible with the character or built form of the area.	No kerbside parking is proposed.	Complies
7.5 Park And Ride Facilities		
<i>Subject to the provisions of this Policy park and ride facilities will be supported close to public transport stops to encourage the use of these services.</i>	The new parking area is intended to be used as a park and ride facility to support the operation of the temporary bus interchange during the shutdown period of the Armadale Rail Line.	Complies
7.6 Traffic/Environmental Impact Statement		
<i>A traffic/environmental impact statement may be required where proposed parking facilities are likely to have a significant impact on the surrounding street system and uses.</i>	The temporary bus interchange will not enhance the capacity of the existing Victoria Park Station. The temporary bus interchange and replacement parking area will not have a significant impact on the surround street system and uses. On this basis a traffic/environmental impact statement is not considered necessary.	Complies

Town of Victoria Park Local Planning Policy 39 Tree Planting and Retention

The Town's Local Planning Policy 39 - Tree Planting and Retention (LPP 39) outlines the requirements for the planting and retention of trees on private land and street verges associated with development of land in the Town.

This application proposes to remove existing vegetation primarily within the Railways Reservation along Kitchener Avenue to accommodate additional parking bays, the proposed exit from the temporary bus interchange and a new entry to the temporary park and ride car park. The development has been designed to retain as many significant trees as possible, however the proposal requires the removal of a limited number of trees within the rail corridor as well as the bottlebrush shrubs that are located in the narrow space between the rail corridor and the proposed new park and ride facility.

In total, 16 trees are to be removed from the Railways Reservation along with the shrubby bottlebrush trees that are located in the Town's verge.

In recognition of the Town's priority to increase the overall tree canopy within the local government area, replacement tree planting will be provided after the cessation of the temporary use at the time that the temporary works are reinstated to the currently existing condition in recognition of the Town.

This will be undertaken on the basis of a one (1) to one (1) tree replacement ratio.

Conclusion

On behalf of ALUA, **element** has prepared this letter in support of the proposed temporary works at the Victoria Park Train Station to accommodate the construction of the VPCLXR project.

We trust the information provided will assist the Town in its assessment of the proposal and to provide a supportive recommendation to the WAPC.

Should you have any queries or require clarification on the above matter, please do not hesitate to contact the undersigned on 9289 8300.

Yours sincerely

element



Renee Young
Associate

element acknowledges the Whadjuk people of the Noongar nation as Traditional Owners of the land on which we live and work. We acknowledge and respect their enduring culture, their contribution to the life of this city, and Elders, past and present.