

Mr Len Kosova
Chief Executive Officer
City of Vincent
PO Box 82
Leederville WA 6902

8th June 2015

Dear Mr Kosova

Amendment No. 40 To Town Planning Scheme No. 1 – Multiple Dwellings (Apartments) in Mount Hawthorn

Thank you for the opportunity to comment on Amendment No. 40 to Town Planning Scheme No. 1.

The Property Council of Australia is the peak industry group for the WA property sector. Many of our members include developers and associated businesses that help to create buildings and places for people to live, work and play in the City of Vincent.

The Property Council is very concerned about the proposal to include the area bounded by Scarborough Beach Road, Oxford Street, Anzac Road and Loftus Street as part of Amendment No.40 To Town Planning Scheme No. 1 and is calling for the amendment to be withdrawn.

The Property Council is calling for the proposal to be rejected for the reasons that it will limit the scope for investment in the area, restricts the choice of owners in the area who wish to redevelop their land and for the negative impact this decision could have on the promotion of infill and density, which are central to the State Government's growth plan for Perth.

While the Property Council recognises that a number of members of the community voiced their support for the ban of apartments in the area, but doing so will severely limit what other residents and property owners of that area are able to choose to do with their land, as well as its potential value.

At a time that the State Government is attempting to drive change in the way Perth develops, as seen with the proposed *Perth and Peel@3.5 million* plan, banning the development of apartments in an inner-city area is a retrograde step.

We all share responsibility for delivering to the State's housing targets, including the City of Vincent. A city that has been growing like Perth cannot afford to have urban land in an inner-city suburb only 4kms from the CBD, such as Mount Hawthorn, completely removed from the possibility of density uplift.

The proposed amendment will rule out significant opportunities for housing diversity in the area, which will dramatically reduce the possibility of constructing affordable, infill housing options.

R30 is a medium density code. To include it in a blanket ban on multiple dwellings undermines the Residential Design Code system and will hinder the goal of achieving the targets in the State Government's *Directions 2031 and Beyond*.

Further, many of the properties zoned R30 in this area are placed in areas ideally suited to act as a transition from high density to low. As a result, prohibiting the development of multiple dwellings in this area will lead to a sub-optimal built form outcome and, ultimately, a sub-optimal outcome for the community.

These properties are located in close vicinity to some of the most significant transport corridors in the northern metro area. For the City of Vincent to categorically ban the development of apartments in much of this area is to jeopardise the viability of a northern public transport solution due to the lack of the necessary population density.

The argument that Mount Hawthorn is 'traditionally a single-dwelling area' is understandable, but could be applied to almost any area in Perth. As the population continues to grow, it is unacceptable that such an argument can be countenanced if there is any intention of curtailing the extension of the city's boundaries.

Development applications should be considered on their own merits and should not be prevented as a result of an indiscriminate blanket ban.

Should you wish to discuss this further, please contact Rebecca Douthwaite at 9426 1203.

Kind regards,

Lino Iacomella
Deputy Executive Director