

Mr Don Burnett
Chief Executive Officer
City of Subiaco
PO Box 270
Subiaco WA 6904

8th July 2016

Dear Mr Burnett,

Re: Draft City of Subiaco Activity Centre Plan

The Property Council of Australia welcomes the opportunity to provide comment on the draft *City of Subiaco Activity Centre Plan (SACP)* and its role in guiding the delivery of mixed use and housing to meet the targets set out in *Directions 2031* and *SPP 4.2 Activity Centres for Perth and Peel*.

The Property Council of Australia is the peak industry body for the property development and investment sectors in WA. The Property Council's members include major businesses with a particular interest in supporting the development of Subiaco.

We have consulted with our members to determine the impact of draft SACP. These consultations have identified improvements to make the activity centre plan more effective and better support the revitalisation of Subiaco.

The Property Council would like to put forward the following recommendations:

- **Development densities on sites capable of development be significantly increased in order to meet the density targets set out in State planning policy.**
- **A strong system of incentives is included to encourage development that delivers good urban design and community outcomes e.g. affordable housing.**
- **The heights currently proposed in the SACP be increased to ensure a sufficient level of employment and residential densities to support transport services to and from Subiaco.**
- **The boundary of the activity centre structure plan area should be expanded to include the Subiaco Oval.**
- **Ensure sufficient density and height in key landmark sites to ensure the high frequency transit envisioned in the plan for corridors such as Hay Street and Rokeby Road.**

Residential density

In order to achieve the desired density target of 35 dwellings per hectare in Subiaco as set out in SPP 4.2 an additional 1100 to 2100 dwellings are required within the SACP area. Given the low height limits available across the centre, the extent of heritage properties and recently developed sites (including MRA areas) - the remaining developable land is limited and will need to have significantly higher densities than currently set out in the draft SCAP.

Landmark sites and height

A number of 'landmark' sites, as well as some 'height-bonus' sites have been identified across the SACP area. However it is considered that the heights that are proposed will not be sufficient to cater for the long term growth needs of Subiaco. The delivery of the additional dwelling yield required on a small number of landmark sites that can best accommodate additional development due to their land assembly will alleviate pressure on the residential areas to accommodate additional development, thereby preserving Subiaco's valued streetscapes.

Employment and economic development

The revitalisation of Subiaco should be a priority given recent developments that will have an adverse impact on the economic viability of the centre. We are concerned at the level of uncertainty local residents and businesses will face following the opening of the new stadium at Burswood; given the high office vacancy rate of 16.3% in Subiaco (which is above the suburban average of 14.3%) and that a number of key sites such as Pavilion Market and Subiaco Square Shopping Centre are now on the market.

Public Transport

Subiaco is as a key centre which is well connected to Perth's CBD and the specialised centre of UWA/ QEII. Key sites such as the Pavilion Markets precinct (bounded by Roberts and Hay) and Subiaco Oval area should be prioritised for increased density due to their proximity to Subiaco and West Leederville train stations and the transit oriented development opportunities they bring.

Conclusion

The Property Council commends the City for achieving this important milestone in planning for the future development of Subiaco. We support the SACP vision to deliver housing and jobs connected to quality public transport and to provide the local amenity that will strengthen Subiaco as a secondary centre. Our proposed changes will deliver increased density and amenity and ultimately deliver the employment and economic development necessary to a fully functioning centre and to KeepWAgrowing.

Kind regards,



Lino Iacomella
Executive Director