



## **Metro North-West Joint Development Assessment Panel Agenda**

**Meeting Date and Time:** Thursday 3 October 2013; 3.30pm  
**Meeting Number:** MNWJDAP/40  
**Meeting Venue:** City of Joondalup – 90 Boas Avenue Joondalup

### **Attendance**

#### **DAP Members**

Ms Karen Hyde (Presiding Member)  
Mr Rory O'Brien (Alternate Deputy Presiding Member)  
Mr Fred Zuideveld (Specialist Member)  
Cr Mike Norman (Local Government Member, City of Joondalup)  
Cr Liam Gobbert (Local Government Member, City of Joondalup)

#### **Officers in attendance**

Mr Craig Shepherd (DAP Secretariat)  
Ms Kym Petani (Department of Planning)  
Mr Emile van Heyningen (Department of Planning)  
Ms Lisa Powell (Department of Planning)  
Ms Melinda Bell (City of Joondalup)  
Ms Dale Page (City of Joondalup)

#### **Local Government Minute Secretary**

Mrs Deborah Gouges (City of Joondalup)

#### **Applicant and Submitters**

Ms Karen Wright (Urbis)  
Mr Kris Nolan (Urbis)  
Mr Brad Osborne (Westfield)

#### **Members of the Public**

Nil

#### **1. Declaration of Opening**

The Presiding Member declares the meeting open and acknowledges the past and present traditional owners and custodians of the land on which the meeting is being held.

#### **2. Apologies**

Mr Paul Drechsler (Deputy Presiding Member)

#### **3. Members on Leave of Absence**

Nil



#### 4. Noting of Minutes

The Minutes of the Metro North-West JDAP Meeting No.39 held on 23 September 2013 were not available at time of Agenda preparation.

#### 5. Disclosure of Interests

<b>Member/Officer</b>	<b>Report Item</b>	<b>Nature of Interest</b>
Mr Paul Drechsler	8.1	Direct Pecuniary

Mr Drechsler was involved in the preparation of the Whitfords Activity Centre Structure Plan and has advised Westfield on this development application.

In accordance with Section 2.4.6 of the Code of Conduct 2011, DAP members participated in a site visit for the application at Item 8.1 prior to the DAP Meeting.

#### 6. Declarations of Due Consideration

Any member who is not familiar with the substance of any report or other information provided for consideration at the DAP meeting must declare that fact before the meeting considers the matter.

#### 7. Deputations and Presentations

Nil

#### 8. Form 1 - Responsible Authority Reports – DAP Application

<b>8.1a</b>	Property Location:	Lot 501 (470) Whitfords Avenue, Hillarys
	Application Details:	Shopping Centre - Proposed Major Expansion
	Applicant:	Urbis
	Owner:	Westfield Management Limited
	Responsible authority:	City of Joondalup
	Report date:	20 September 2013
	DoP File No:	DP/13/00578

<b>8.1b</b>	Property Location:	Lot 501 Whitfords Avenue, Hillarys
	Application Details:	Shopping Centre - Proposed Major Expansion
	Applicant:	Urbis
	Owner:	Westfield Management Limited
	Responsible authority:	WAPC
	Report date:	20 September 2013
	DoP File No:	DP/13/00578

#### 9. Form 2 – Responsible Authority Reports - Amending or cancelling DAP development approval

Nil



## **10. Appeals to the State Administrative Tribunal**

As invited by the State Administrative Tribunal under Section 31 of the *State Administrative Act 2004*, the Metro North-West JDAP reconsidered the additions to St Patrick's Anglican Church Offices & Rectory at Lot 123 (No.731) Beaufort Street, Mount Lawley on 23 September 2013.

## **11. Meeting Closure**



## Form 1 - Responsible Authority Report (Regulation 12)

<b>Property Location:</b>	Lot 501 (470) Whitfords Avenue, Hillarys
<b>Application Details:</b>	Urbis Pty Ltd
<b>DAP Name:</b>	Metro North-West JDAP
<b>Applicant:</b>	Urbis Pty Ltd
<b>Owner:</b>	Westfield Management Ltd, Reco Whitford Pty Ltd and RE1 Ltd
<b>LG Reference:</b>	DA13/0771
<b>Responsible Authority:</b>	City of Joondalup
<b>Authorising Officer:</b>	Dale Page Director Planning and Community Development
<b>Department of Planning File No:</b>	DA/13/00578
<b>Report Date:</b>	20 September 2013
<b>Application Receipt Date:</b>	4 July 2013
<b>Application Process Days:</b>	90 days
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1 Location and zoning plan</li> <li>2 Existing development plans</li> <li>3 Proposed development plans and building perspectives</li> <li>4 Summary of submissions</li> <li>5 Summary of feedback from service authorities</li> <li>6 Assessment against State Planning Policy 4.2</li> <li>7 Assessment against development requirements of DPS2</li> <li>8 Assessment against draft Whitford Activity Centre Structure Plan</li> <li>9 Access and movement plans</li> <li>10 Review of transport assessment</li> <li>11 Environmentally sustainable design checklists</li> <li>12 Landscape masterplan</li> </ol>

**Recommendation:**

That the Metro North-West JDAP resolves to:

**Refuse** DAP Application reference DA/13/00578 and accompanying plans DA-01 (Revision B), DA-03 (Revision B), DA-04 (Revision B), DA-05 (Revision B), DA-06 (Revision B), DA-07 (Revision B), DA-08 (Revision B), DA-09 (Revision B), DA10- (Revision A), DA-11 (Revision A), DA-12 (Revision A), DA-13 (Revision B), DA-14 (Revision B), DA-15 (Revision B), DA-16 (Revision B) and DA-17 (Revision B), for the following reasons:

**Reasons:**

1. Pursuant to clause(s) 9.11(d) and 3.7.2 of the City of Joondalup District Planning Scheme No. 2 the application has been considered having regard to the provisions of State Planning Policy 4.2. In this instance it is considered that no 'exceptional circumstances' exist to warrant approval of the

*development application for ‘major development’ prior to the endorsement of an activity centre structure plan.*

2. *Pursuant to clause 9.11(a) of the City of Joondalup District Planning Scheme No. 2, the intent of the application is to deliver a large-scale retail expansion of the shopping centre only, and not an activity centre as contemplated by State Planning Policy 4.2.*
3. *Pursuant to clause 9.11(b) of the City of Joondalup District Planning Scheme No. 2, there is a strong need to have an agreed activity centre structure plan in place before development or subdivision occurs in order to suitably resolve issues relating to traffic, retail floorspace, land use diversity, coordinated approach to infrastructure upgrades, and housing density. Approval of this development prior to the endorsement of an agreed activity centre structure plan may significantly compromise the ability for future development within the activity centre to be delivered in a manner that is aligned with State Planning Policy 4.2. Therefore, it is highly desirable from a planning point of view that there be an agreed structure plan before major development, such as that which has been proposed, takes place within the activity centre.*
4. *Pursuant to clause 9.11(c) of the City of Joondalup District Planning Scheme No. 2, the proposed development is not considered to be in the interests of orderly and proper planning, and will impact on the amenity of the locality in the short, intermediate, and long term, for the following reasons:*
  - i. *The proposed amount of retail floorspace may impact on the function, role, and hierarchy of other centres within the locality, and would inhibit the orderly development of those centres.*
  - ii. *If supported, the proposed extent of retail floorspace may inhibit the ability for any further retail development to take place within the Whitford Activity Centre.*
  - iii. *The traffic generated by the proposed development, and the subsequent impacts on the surrounding road network and intersections, will adversely impact on the amenity of the locality, and may also inhibit the scale or nature of future development within the Whitford Activity Centre.*
  - iv. *The proposed development, being entirely of a retail nature, does not contribute to an appropriate mix of land uses within the activity centre boundary.*
  - v. *The bulk and scale of the development as viewed from Banks Avenue, and the location of the loading and service areas, also in close proximity to residential development will adversely impact on the amenity of these residents and the locality as a whole.*

#### **Advice Notes**

1. *Notwithstanding the refusal reasons set out above, irrespective of whether or not ‘exceptional circumstances’ exist that would warrant consideration of the subject development application in accordance with State Planning Policy 4.2, the development is considered not to satisfy the provisions or intent of this policy.*
2. *The City is of the opinion that the draft Whitford Activity Centre Structure Plan is not a ‘seriously entertained planning proposal’ and therefore should not be*

*accepted as justification that exceptional circumstances exist that warrant consideration or approval of this development application.*

- The proposed development application is considered to be premature, and its approval in the absence of an agreed structure plan could substantially compromise the future development of the Whitford Activity Centre in the manner intended by State Planning Policy 4.2, and the City of Joondalup District Planning Scheme No 2.*

**Background:**

Insert Property Address:	Lot 501 (470) Whitfords Avenue, Hillarys
Insert Zoning	MRS: Urban
	TPS: Commercial
Insert Use Class:	'Shop' and 'Department Store'
Insert Strategy Policy:	Not applicable
Insert Development Scheme:	<i>City of Joondalup District Planning Scheme No.2</i>
Insert Lot Size:	19.78ha
Insert Existing Land Use:	'Shop', 'Service Station', 'Recreation Centre', 'Drive Through Food Outlet', 'Tattoo Studio', 'Office', 'Medical Centre', 'Restaurant', 'Tavern'
Value of Development:	\$192.2 million

The subject site is the Westfield Whitford City Shopping Centre in Hillarys. It is bound by Marmion Avenue and a City owned site containing the Whitford Library and Senior Citizen's Centre to the east, Whitfords Avenue to the north, Endeavour Road to the west and Banks Avenue to the south (Attachment 1 refers).

The shopping centre originally opened in 1978 and was comprised of a department store, discount department store, supermarket and other retail stores totalling 22,307m<sup>2</sup> net lettable area (NLA). Since the opening of the shopping centre, a number of major expansion proposals have been determined, including:

- A number of approvals for an additional 17,140m<sup>2</sup> NLA between 1985-1990. The extensions comprised a food hall and other retail stores. During this time the department store ceased operating.
- Approval of an additional 13,070m<sup>2</sup> NLA in 1991, including a second discount department store, other retail stores, and rooftop and basement car parking.
- Approval by the Town Planning Appeal Tribunal in 1992 for six cinemas.
- Refusal by the City and WAPC in 1997 for additions to bring the total retail floor space to 72,150m<sup>2</sup> NLA, comprising a two level department store, speciality shops, non-retail uses, a mall over the existing mall, the relocation of a supermarket and removal of the service station. The City's and the WAPC's decision to refuse this application was upheld by the Town Planning Appeal Tribunal in 1998.
- Approval for extensions in 2001 (following earlier approvals in 1999 and 2000) for retail stores, relocated supermarket and outdoor piazza, bringing the total retail NLA for the shopping centre to 48,537m<sup>2</sup>.

No further major development has occurred since the expansion in 2001, however a number of development applications for minor additions and modifications to the

centre have been approved, such as internal works and kiosk additions. The total retail NLA for the shopping centre is currently 49,990m<sup>2</sup>.

In addition to the shopping centre complex, three free-standing drive-through food outlets and a two storey business complex have been developed on the western portion of the site. While these developments need to be considered for the purposes of calculating the car parking requirement across the site, they are not directly impacted by this proposal and therefore the detailed background to their development has not been included.

The site is currently comprised of:

- Big W and Target discount department stores;
- Woolworths and Coles supermarkets;
- Cinema complex;
- Mini-majors including Lincraft, JB Hi-Fi, Best & Less, Rebel Sport, City Beach, and Dick Smith;
- Over 250 hundred specialty stores, fast food outlets, and a food hall;
- A tavern and State Swim centre;
- A service station; and
- Endeavour Business Centre office complex.

The existing development plans are provided in Attachment 2.

#### Access easement

A private road extending from Banks Avenue into the shopping centre, at the eastern edge of the centre is the subject of an easement created in 1979 between the City and the owners of the shopping centre site. This easement provides unlimited rights of access for the shopping centre and the adjoining City owned site which is the location of the Whitfords Library and Whitford Senior Citizen's Centre. Westfield is responsible for the maintenance of the road.

While development is proposed to occur within the vicinity of the area affected by the easement, the development will not impact on the current arrangement. However, it is proposed that this road will be enhanced and upgraded as part of the ongoing redevelopment of the centre, to complement the development proposed in this application. As the works to upgrade the internal road would not be undertaken in the absence of approval for the expansion of the centre and as these works would require further consultation and agreement with the City, it is proposed by the applicant that these works will form part of a separate development application.

#### Whitford Activity Centre and Draft Whitford Activity Centre Structure Plan

Council, at its meeting held on 16 September 2012, requested the preparation of a structure plan for the Whitford Activity Centre and agreed a boundary for the area that will form the activity centre (CJ181-09/12 refers). This boundary is indicated in Attachment 1.

Subsequent to this, the City considered an application requesting the area within the identified Whitford Activity Centre boundary to be rezoned to 'Centre' under DPS2 (Scheme Amendment No. 68). The proposed zoning is consistent with *State*

*Planning Policy 4.2 – Activity Centres for Perth and Peel* (SPP 4.2), and provides the statutory basis for the implementation of an activity centre structure plan.

Council, at its meeting held on 23 October 2012, resolved to initiate Scheme Amendment No. 68 for the purposes of public consultation (CJ199-10/12 refers). Consultation on the scheme amendment was undertaken between 16 June and 15 July 2013 in conjunction with advertising of the draft Whitford Activity Centre Structure Plan. It is anticipated that the amendment will be considered further by Council at its meeting in November 2013, in conjunction with the draft Whitford Activity Centre Structure Plan.

The activity centre structure plan for the area was received by the City in November 2012. Council, at its meeting held on 19 March 2013, considered a report regarding the initiating of advertising of the draft activity centre structure plan (CJ024-03/13 refers). This report identified a number of significant issues and concerns with the draft activity centre structure plan, including the implications and future management of increased traffic, the staging and implementation of development, the cost-sharing arrangements for infrastructure upgrades and public realm improvements, and the scale of retail expansion and its impact on other nearby centres and the retail hierarchy in State Planning Policy 4.2.

In its resolution on the item, Council formally reinforced the concerns identified with the draft activity centre structure plan. Council considered however that it was timely for the structure plan to be advertised so the community could be given opportunity to comment on the proposal, after which the applicant could consider making changes to the document to address both the City's and community's issues prior to Council making a final decision on the activity centre structure plan. As mentioned above, consultation on the draft Whitford Activity Centre Structure Plan was undertaken between 16 June and 15 August 2013.

Further assessment of the activity centre structure plan and discussions with the applicant are currently being undertaken.

#### Draft Local Commercial Strategy

The draft Local Commercial Strategy will apply SPP 4.2 to the City of Joondalup. The strategy will be used as the basis for preparing and amending the local planning scheme, and for preparing and assessing activity centre structure plans and development applications within centres.

In accordance with the requirements of the SPP 4.2, the draft Local Commercial Strategy considers how to:

- optimise housing potential in walkable catchments and meet density targets in conjunction with the Local Housing Strategy;
- support planning decision making by including an assessment of projected retail needs of communities, taking into account proposals in adjacent local government areas;
- apply the Activity Centre hierarchy; and
- provide sufficient development opportunities to enable a diverse supply of commercial and residential floor space.



In relation to this site, the initial draft Local Commercial Strategy provided an indicative shop-retail NLA threshold of 50,000m<sup>2</sup> before a Retail Sustainability Assessment would be required by the City to justify the additional shop-retail NLA.

The draft Local Commercial Strategy was advertised for public comment, which closed on 23 October 2012. A review of the draft Local Commercial Strategy was undertaken following consultation. It is anticipated that the amended draft Local Commercial Strategy will be considered by Council at its meeting in November 2013.

### **Details: outline of development application**

The application seeks approval for redevelopment of, and extensions to, the existing shopping centre. The extensions are proposed to be concentrated at the eastern end of the centre. The development will comprise of 31,461m<sup>2</sup> shop-retail NLA (bringing the total shop-retail NLA to 81,451m<sup>2</sup>), and will include:

- A new, relocated Coles supermarket;
- An additional, smaller supermarket;
- A new, two storey David Jones department store of 12,000m<sup>2</sup>;
- A new, relocated Big W discount department store; and
- A new, externally orientated retail space at the eastern edge of the centre which will front an upgraded internal road (the upgrade to the internal road will form part of a future development application).

To accommodate the retail expansion, the following also forms part of the proposal:

- An additional 568 car bays will be constructed mostly in the form of basement and rooftop parking, bringing the total car parking provided across the site to 4,317 bays;
- Reconfiguration of the car parking area to the north of the shopping centre building;
- New access from Marmion Avenue, immediately to the north of the City's landholdings (Marmion Promenade);
- A new facade treatment to the area of the centre the subject of the expansion;
- New loading areas on the northern and southern sides of the extensions;
- End of journey facilities for staff and additional bicycle parking for customers and staff; and
- Upgraded landscaping on the eastern portion of the site.

Extensive information has been provided in support of the proposal. This includes transport, acoustic and environmentally sustainable design reports.

In regard to the overall design concept, the applicant has stated:

*Westfield Whitford City currently embodies various retail centre design directions of the past, which at their time, were considered very beneficial to the different retailer demands within the centre, as well as shopping preferences at the time. The proposed expansion aims to take the design intent to the level of expectation of retailers and shoppers and surpass that by tapping into their aspirational desires of lifestyle and socialising. In effect this results in a more open and articulated environment, with some indoor/outdoor interactions, in place of the purely internalised, and minimalistic styling of the past.*

*The proposed expansion design integrates landmark elements that call attention to the site, and seeks to break down the large dimensions of the centre, to blend more sympathetically with the surrounding environment.*

*The existing centre is set back at the north-east a good distance from the surrounding streets, and has dated utilitarian facades at the remainder of the frontages. These conditions conceal the centres presentation from the street, leading to an isolated feeling upon approach, and distancing the centre from the community. The abundance of surface car parking also reinforces the perception that the centre should be accessed via car only, and that it is not a pedestrian friendly environment.*

## **Legislation & policy:**

### Legislation

#### *Metropolitan Region Scheme*

The subject site is zoned 'Urban' under the Metropolitan Region Scheme.

It should also be noted that Whitfords Avenue, which adjoins the site immediately to the north is reserved for the purposes of 'Other Regional Road', and Marmion Avenue, which adjoins the site immediately to the east is reserved for the purposes of 'Primary Regional Road' under the Metropolitan Region Scheme.

#### *City of Joondalup District Planning Scheme No.2 (DPS2)*

Under DPS2, the subject site is currently located within the 'Commercial' zone. The objectives and development requirements for this zone are set out under clause 3.7 and Part 4 of DPS2.

Clause 3.7.2 of DPS2 states that subject to clause 9.11, 'major development' within the Whitford Activity Centre shall not be approved unless an activity centre structure plan has been prepared and adopted in accordance with SPP 4.2 and Part 9 of DPS2. It is noted that 'major development' for the purposes of activity centre has the same meaning under DPS2 as that given to it by SPP 4.2.

Clause 9.11 of DPS2 states that if Council is required to consider an application in the absence of a structure plan that the Council, in addition to other matters required by DPS2, shall have regard to the following:

- (a) As an overriding consideration, the intent of the application;*
- (b) The desirability from a planning point of view of having an Agreed Structure Plan in place before development or subdivision occurs; and*
- (c) The interests of orderly and proper planning, and concern for the amenity of the relevant locality in the short, intermediate and long term.*
- (d) In the case of major development in an activity centre requiring an activity centre structure plan under clause 3.7.2 and 3.11.4, the provisions of SPP 4.2.*

In addition to the matters listed under clause 9.11, consideration should also be given to the matters listed under clause 6.8 of DPS2.

### State Government Policies

## *State Planning Policy 4.2 – Activity Centres for Perth and Peel (SPP 4.2)*

Under clause 6.4 (1) of SPP 4.2, activity centre structure plans are to be prepared for strategic metropolitan, secondary, district and specialised centres, but not for neighbourhood or local centres. Whitford is designated a secondary centre under the SPP 4.2 hierarchy.

In the absence of an activity centre structure plan, clause 6.4 (2) of SPP 4.2 requires the applicant to demonstrate that there are exceptional circumstances that would warrant the consideration of a development application for major development prior to the adoption of an activity centre structure plan. Major development is defined as any building or extensions used for shop-retail purposes where the NLA of a proposed building is more than 10,000m<sup>2</sup> or extension to an existing building is more than 5,000m<sup>2</sup>.

The proposed development incorporates an additional 31,461m<sup>2</sup> shop-retail NLA, and therefore constitutes major development for the purposes of SPP 4.2. The applicant's justification for exceptional circumstances is discussed in the planning assessment section of this report.

In the absence of an activity centre structure plan but where sufficient exceptional circumstances are demonstrated, any major development must satisfy relevant requirements of the policy, including certain requirement of the Model Centre Framework. The Model Centre Framework is outlined in Appendix 3 of SPP 4.2 and addresses elements such as centre context, activity, movement and urban form.

### **Local Policies**

#### *Council Policy - Environmentally Sustainable Design*

This policy applies to the construction of major residential, commercial and mixed use buildings. The purpose of the policy is to encourage development to incorporate environmentally sustainable principles into the building design. The policy also requires applications for development the subject of the policy to be accompanied by the *City of Joondalup – Environmentally Sustainable Design Checklist*. The checklist for the proposed development is provided in Attachment 11.

#### *Council Policy – Signs*

This policy provides guidance on the extent and location of various forms of signage that are not exempt from planning approval under DPS2.

While the applicant has demonstrated some decal and display windows on the elevations it has been stated that signage does not form part of the application. Rather, a separate development application would be lodged, which is envisaged to include signage of various dimensions to support the development.

### **Consultation:**

#### Public Consultation

The development proposal was advertised for a period of 21 days, from 25 July to 15 August 2013. Consultation was undertaken in the following manner:

- A letter and set of “Frequently Asked Questions” was sent to land owners and occupiers of all properties within 400 metres of the proposed Whitford Activity Centre Structure Plan boundary;
- Five signs were erected on-site at all major entrances;
- Notices were placed in the Joondalup Weekender for three consecutive weeks;
- Details of the application and the “Frequently Asked Questions” were posted on the City’s website; and
- Development plans and submission documentation were made available at the City’s administration building, all four libraries and the customer service centres.

A total of 319 submissions were received in the form of individual submissions and proforma letters. Where more than one submission was received from a land owner or occupier these have been combined and counted as one submission from that land owner or occupier.

The submissions comprised:

- 246 objections;
- One objection, however subsequent neutral submission received from the submitter;
- Five no objections, however subsequent objections received from the submitter(s);
- 37 submissions stating no objections;
- 20 neutral submissions; and
- 10 submissions of support.

A summary of submissions by theme is provided in Attachment 4. The key concerns raised regarding the proposed development during consultation are discussed further in the planning assessment section of this report.

#### Consultation with other Agencies or Consultants

The City received comments from Main Roads WA, the Department of Transport, the Public Transport Authority, Water Corporation and the Department of Planning’s Infrastructure and Land Use Coordination section.

These authorities raised several issues that will require further review or discussions between the applicant and the relevant service authority, but are generally supportive of the proposed development.

The only aspect of the proposed development, which is not supported by a service authority (Main Roads WA) is the new entrance to the centre from Marmion Avenue.

A summary of feedback received from service authorities is provided in Attachment 5.

#### **Planning assessment:**

The proposal is for extensions to the eastern end of the existing shopping centre. The development will consist of an additional 31,461m<sup>2</sup> shop-retail NLA, bringing the

total shop-retail NLA to 81,451m<sup>2</sup>. This includes a new department store, supermarkets, relocated discount department store, and other speciality retail.

Clause 3.7.2 of DPS2 requires an activity centre structure plan to be prepared and endorsed as a precursor to major development. However, where the City is required to consider an application in the absence of a structure plan, clause 9.11 of DPS2 applies:

### **9.11 Development prior to adoption of structure plan**

*If Council is required to consider an application in respect of a development, use or subdivision proposal before a Structure Plan has been prepared and adopted, then the Council shall, in addition to any other matters required by this Scheme to be considered, have regard to the following considerations:*

- (a) As an overriding consideration, the intent of the application;*
- (b) The desirability from a planning point of view of having an Agreed Structure Plan in place before development or subdivision occurs; and*
- (c) The interests of orderly and proper planning, and concern for the amenity of the relevant locality in the short, intermediate and long term.*
- (d) In the case of major development in an activity centre requiring an activity centre structure plan under clauses 3.7.2 and 3.11.4, the provisions of State Planning Policy 4.2 – Activity Centres for Perth and Peel.*

In accordance with this clause the application has been assessed against the requirements of DPS2 and SPP 4.2. In addition, a draft Whitford Activity Centre Structure Plan was submitted to the City in November 2012 and considered by Council at its meeting of 19 March 2013. Regard has also been given to this activity centre structure plan in the assessment of the application should the JDAP consider it a 'seriously entertained planning proposal'. The following planning assessment has been structured as follows:

- Demonstration of exceptional circumstances required under SPP 4.2
- Assessment against the requirements of SPP 4.2
- Assessment against the development requirements for the 'Commercial' zone under DPS2
- Assessment against the draft Whitford Activity Centre Structure Plan
- Response to submissions
- Conclusion

#### *Demonstration of exceptional circumstances required under SPP 4.2*

SPP 4.2 requires an activity centre structure plan to be prepared for secondary centres as a precursor to major development. However, in exceptional circumstances (in the absence of an approved activity centre structure plan) major development is able to be considered having regard to the policy provisions, including the Model Centre Framework, which sets out the requirements for activity centre structure plans.

The applicant considers that there are three exceptional circumstances that warrant consideration of the development application prior to endorsement of an activity centre structure plan:

1. The desire to attract a national department store (David Jones) to complement the centre's role and function which will only occur if the development is approved prior to 31 October 2013 (prior to the structure plan being finalised).
2. The fact that a relevant structure plan, the draft Whitford Activity Centre Structure Plan, is being progressed in consultation with the local government and the WA Planning Commission, such that it can be treated as a seriously entertained planning proposal.
3. The process undertaken for the consideration of a structure plan is not based on an ordinary course of circumstances, and there have been events that have resulted in significant delays. This has created an exceptional process that has prevented a structure plan from being adopted prior to the requirement for a development application.

The applicant has also provided legal advice on what constitutes a 'seriously entertained planning proposal' and exceptional circumstances. The City has also sought legal advice on the information provided by the applicant. In general, the legal advice provided to the City considers that where exceptional circumstances is not defined or clarified within SPP 4.2, the term is used in the context of the state planning policy, and any exceptional circumstance must be of a planning nature.

A summary of the applicant's justification and the City's response to these points are set out below:

1. **The desire to attract a national department store (David Jones) to complement the centre's role and function which will only occur if the development is approved prior to 31 October 2013 (prior to the structure plan being finalised).**

#### ***Summary of applicant's justification***

It is acknowledged that commercial timeframes are not in themselves an "exceptional circumstance". In the context of the extraordinary planning process encountered to date however, commercial timeframes should be a consideration of the determining authority and contribute toward the exceptional circumstances being experienced by Westfield.

#### ***City's response***

A contractual arrangement between the land owner and David Jones is of a commercial nature, and not of a planning nature. Therefore this factor in itself does not amount to an exceptional circumstance.

The applicant has correctly acknowledged that its commercial timeframes cannot give rise to an exceptional circumstance. Notwithstanding this acknowledgement, the applicant suggests that its commercial arrangements with David Jones should still be considered in the context of the unusual planning process that has been undertaken. However, it is considered that while an extensive planning process has been

undertaken, there was nothing that specifically precluded the land owner from requesting the City to require a structure plan. This is discussed further below in Point 3. In any event, the commercial arrangements with David Jones do not assume relevance as a consequence of the planning process.

- 2. The fact that a relevant structure plan, the draft Whitford Activity Centre Structure Plan, is being progressed in consultation with the local government and the WA Planning Commission, such that it can be treated as a seriously entertained planning proposal.**

### ***Summary of applicant's justification***

The training notes for the Development Assessment Panel provide insight as to how the draft planning documents should be considered in making statutory determination. Specifically it states that draft scheme amendments and policies can still be given weight even though they are not operative. This is based on a number of cases. In Western Australia, a document is usually considered 'seriously entertained' after advertising is completed, and the further towards approval the document is, the more 'seriously entertained' it is considered to be. The leading case in the State Administrative Tribunal in *Nicholls and Western Australian Planning Commission [2005] WASAT 40*, which provides useful analysis of how a draft policy is to be treated by setting out a four stage enquiry. Applying these stages to determining the weight which should be afforded to the draft WACSP, the following is made:

#### *(a) The degree to which the draft addresses the specific application*

The development application responds specifically to the requirements of the draft WACSP. Further, the shopping centre expansion adheres to all of the identified land use and design requirements. As such, the two statutory documents are inherently linked.

#### *(b) The degree to which the draft is based on sound town planning principles*

The draft WACSP has been prepared in accordance with SPP 4.2. Moreover the activity centre structure plan addresses matters of land use diversity, residential density, movement and access and retail floor space as required by this state planning policy. Given the consistency with SPP 4.2 the draft WACSP is based on sound town planning principles.

#### *(c) The degree to which its ultimate approval could be regarded as certain*

Westfield has been progressing planning for the Whitford Activity Centre for the last three years and has expended \$1 million in doing so. In accordance with SPP 4.2, the activity centre structure plan is required prior to any major redevelopment/expansion.

Westfield are committed to expanding Whitford City and redevelopment of their landholdings elsewhere within the identified activity centre structure plan area and therefore are reliant upon an activity centre structure plan being in place. The current draft has been prepared in close consultation with the Department of Planning, and the City of Joondalup, and has substantially progressed through the statutory approvals process.

While it is acknowledged that some modifications to the draft activity centre structure plan are likely to be required before the final approval from the WAPC, it is submitted that it is certain that the activity centre structure plan will be approved at a point in the near future.

*(d) The degree to which its ultimate approval could be regarded as imminent*

The draft activity centre structure plan was advertised to the general public and referred to specific government agencies for 60 days, concluding on 15 July 2013. It is anticipated that the activity centre structure plan will be presented back to Council in November 2013. From there, given the significant amount of consultation that has been undertaken with officers at the Department of Planning, Westfield is hopeful that the final WACSP can be obtained from the WAPC in December 2013 or January 2014.

In summary, based on the fact that advertising is complete (and for the most part submissions responded to), it is considered that the draft WACSP is a 'seriously entertained planning proposal'. Furthermore, it is considered that based on the above that substantial weight can be afforded to the draft WACSP in the consideration of the Whitford City Shopping Centre expansion development application.

**City's response**

It is acknowledged that draft activity centre structure plans are capable of becoming seriously entertained planning proposals. There are cases in which the adoption of a planning instrument for advertising has been found to make the instrument a seriously entertained planning proposal. However, these are instances where a local government has itself promulgated the instrument so that it is seen as defining, for the present, what the local government sees as orderly and proper planning for the area to which the instrument relates. If seriously entertained, the instrument becomes a matter as to orderly and proper planning, subject to considerations going to the weight that should be accorded to the instrument in the circumstances.

The applicant might argue that the decision made by Council on 19 March 2013, to advertise the draft Whitford Activity Centre Structure Plan, signified that Council regards the activity centre structure plan as satisfactory. That argument arises from Clause 9.4.1 (a) of DPS2 which contains the power exercised by Council in advertising the draft structure plan. That clause only operates where Council determines that the structure plan is satisfactory.

However, Council's decision of 19 March 2013 emphasises that the draft activity centre structure plan has not been prepared by the City, that there are a number of significant issues requiring resolution to the City's satisfaction (which relevantly include the scale of the retail expansion), that the decision to advertise was principally to give the community the opportunity to comment and that the applicant may then consider changes to the activity centre structure plan to address the City's concerns and any issues raised by the community. In view of these matters, it could not be concluded that the draft activity centre structure plan constitutes a planning proposal, which represents what the City presently regards as orderly and proper planning.

Therefore, while the applicant could argue that the decision under Clause 9.4.1(a) may suggest Council's satisfaction with the draft activity centre structure plan, the terms of Council's decision indicate a different position. In the circumstances, the



mere advertising of the draft activity centre structure plan does not convert it into a seriously entertained planning proposal.

Another relevant consideration is that the City is not the only planning authority required to accept the draft activity centre structure plan. It must also be endorsed by the WAPC whose attitude to the document is presently unknown from the City's perspective.

For these reasons, it is considered that the draft activity centre structure plan is not yet a seriously entertained planning proposal.

However, even if the JDAP was to consider it to be seriously entertained, there would be a strong argument that at this early stage of the structure planning process it should be afforded little weight. Simply because an instrument has progressed to a stage of being seriously entertained, doesn't mean it's to be given significant weight as a factor in determining a development application. The SAT has recognised four factors which must be considered in determining the weight to be accorded a seriously entertained planning proposal. These are outlined above in the summary of the applicant's submissions. In response, the City makes the following points:

(a) *The degree to which the draft addresses the specific application*

It is not contended by the City that the draft activity centre structure plan does not address the development proposed under this application. However, as discussed further in the assessment of the development against the activity centre structure plan, the City believes that there are a number of areas where the development fails to meet the development requirements of the draft activity centre structure plan.

(b) *The degree to which the draft is based on sound town planning principles*

The applicant has stated that the draft activity centre structure plan is based on sound planning principle, specifically the alignment of the activity centre structure plan with SPP 4.2.

The City has identified a number of aspects of the draft activity centre structure plan, which fail to meet the requirements of SPP 4.2. This includes a lack of detail on staging and implementation, failure to achieve land use diversity target during stages of development, and a retail floor space amount that could compromise the retail hierarchy and health of other activity centres. With respect to these critical issues, the City does not accept that the draft activity centre structure plan is based on sound planning principles.

(c) *The degree to which its ultimate approval could be regarded as certain*

(d) *The degree to which its ultimate approval could be regarded as imminent*

While the activity centre structure plan has been advertised by the City for public comment, given the issues that have been raised it could not be considered that approval of the proposal is certain nor imminent. As there are fundamental aspects of the activity centre structure plan which may be subject to modification by both the City and the WAPC and additional changes considered in light of submissions from the community, the final

form of the activity centre structure plan cannot be regarded as either certain or imminent.

In view of these matters, the draft activity centre structure plan, if regarded as seriously entertained, should be given no weight. Therefore, it could not be relied upon to conclude that exceptional circumstances exist to warrant determination of the development application.

- 3. The process undertaken for the consideration of a structure plan is not based on an ordinary course of circumstances, and there have been events that have resulted in significant delays. This has created an exceptional process that has prevented a structure plan from being adopted prior to the requirement for a development application.**

### ***Summary of applicant's justification***

Westfield stresses that its contention that the draft Whitford Activity Centre Structure Plan is "seriously entertained" is not central to its contention that "exceptional circumstances" exist. The notion of "exceptional circumstances" has been defined in a number of legal cases, and legal advice to this effect has been provided. In summary, this advice sets out that exceptional circumstances would not exist if the relevant circumstances are usual, common or something that happens in the ordinary course. Further, the meaning of exceptional circumstances, may include a combination of factors which, where viewed together may reasonably be seen as producing a situation which is out of the ordinary course, unusual or uncommon. In applying this it is noted that there has been significant delays that have prohibited the adoption of an activity centre structure plan to date. This has included:

- The City making it a priority for the Joondalup City Centre to develop and succeed ahead of Whitford.
- A scheme amendment to align DPS2 with SPP 4.2 and a draft activity centre structure plan was submitted in December 2010, which was the result of a 13 month planning exercise undertaken at great cost to Westfield. It was understood that the plan could be considered upon receipt following discussion with the City.
- The City refused to adopt the activity centre structure plan for the purposes of advertising, and refused to engage in any dialogue with Westfield prior to it being determined by Council.
- Westfield commenced SAT proceedings in June 2011, and as opposed to engaging in proceedings, the City in early October raised a technical jurisdictional objection, being that the SAT is unable review the decision as the City had not requested the preparation of an activity centre structure plan for the area as required under DPS2. This action resulted in Westfield discontinuing the proceedings.
- The resolution of the SAT proceedings occurred ten months after the lodgement of the initial activity centre structure plan with the City. During this time the City did not raise the technical issue despite being clearly aware, and allowed Westfield to expend significant expense and time of what it contended a "planning nullity".
- Following the SAT proceedings Westfield applied to the Minister for Planning to intervene via a Section 76 order. The Minister for Planning directed the City to amend DPS2 to align with SPP 4.2. This direction sought the removal of retail floor space caps and provided the statutory ability for development

applications to be considered ahead of the finalisation of activity centre structure plans.

- The City determined the extent of the Whitford Activity Centre boundary in September 2012 and requested Westfield to prepare a structure plan.
- Westfield lodged an activity centre structure plan in November 2013.
- In March 2013 the City gave consent to advertise the activity centre structure plan, with advertising concluding on 15 July 2013.
- In seeking to respond to commercial timeframes of a major tenant, the development application was lodged on 4 July 2013.

Westfield contends that there is nothing usual or common about this process and it is well aware that this process does not occur in ordinary course. The fact that a Ministerial Order was required to ensure the City's alignment of DPS2 with SPP 4.2 and to consider planning for centres other than Joondalup, they consider only further highlights that the process experienced to date could only be considered as "exceptional". Further, a process that prevents a landowner from planning for and development its property in a way consistent with state policy, with no right of redress, can only be considered extraordinary.

### ***City's response***

The legal advice provided by the applicant on what is meant by exceptional circumstances simply sets out the main points from cases on exceptional circumstances. These points are considered reasonable. However the applicant's legal advice does not attempt to apply these points to the circumstances of this particular development application. Therefore, the legal advice does not say that exceptional circumstances exist in this case.

The applicant's argument that exceptional circumstances exist largely relates to the three year process that has occurred from December 2010 to present. This argument is focused on process and delay. None of its argument is focussed on the proposed development, and therefore there is nothing about the development itself or its context that gives rise to any exceptional circumstance.

In regard to the delays experienced, ten months of this is a consequence of Westfield's misconceived submission of an activity centre structure plan in 2010 and the related SAT proceeding. Their own error could not be claimed as contributing to the establishment of an exceptional circumstance. While the Section 76 direction of the Minister for Planning is unusual, it was not a necessary prerequisite to progressing the activity centre structure plan, as is evidenced by the current activity centre structure plan process running parallel with the scheme amendment. Finally, the process of Council decision making leading to the 2012 activity centre structure plan and all that has subsequently occurred could in no way be regarded as unusual. The process has been undertaken properly in accordance with the provisions of Part 9 of DPS2.

Given the above, it is considered that arguments put forward by the applicant do not support the conclusion that exceptional circumstances exist. Therefore, the application for major development cannot be considered ahead of an activity centre structure plan being endorsed for the centre.

## *Conclusion*

On the basis of the above, it is considered that the applicant has not demonstrated that exceptional circumstances exist that would warrant consideration of the application further against the requirements of SPP 4.2 or before the activity centre structure plan is finalised.

### Assessment against the requirements of SPP 4.2

Notwithstanding the above, it is acknowledged that the JDAP could still accept the applicant's reasons for exceptional circumstances. Should this be the case, the application needs to be considered further against the requirements of SPP 4.2, specifically the requirements for a secondary centre and specific requirements of the Model Centre Framework. The requirements of the Model Centre Framework are broad standards and compliance could be met in a number of different ways dependent on the context.

The City's assessment of the application against the requirements of SPP 4.2 is set out in Attachment 6.

This assessment has identified a number of areas where the development is considered to not demonstrate compliance with SPP 4.2:

- The retail sustainability assessment is not considered to justify the proposed shop-retail floor space of 81,451m<sup>2</sup>. An independent review of the retail sustainability assessment has been undertaken for the City. This review has concluded that the applicant's own information and analysis supports a floor space of 65,000m<sup>2</sup> to 75,000m<sup>2</sup> before there is the potential to impact on the retail hierarchy and other centres;
- The land use diversity mix within the future structure plan boundary will be 26.46%, which is less than the 40% required for a secondary centre with between 50,000m<sup>2</sup> to 100,000m<sup>2</sup> shop-retail floor space. The diversity percentage proposed is equivalent of that which would be acceptable for a centre with a shop-retail floor space of between 10,000m<sup>2</sup> to 20,000m<sup>2</sup>. Under the draft Whitford Activity Centre Structure Plan it is indicated that the land use diversity will achieve a diversity target of 42% by 2031;
- The transport report is not considered to adequately demonstrate that the development will not have a detrimental impact on the road network;
- The number of residential dwellings within the 400 metre walkable catchment of the centre is currently approximately 910 dwellings, but the policy requires a minimum of 2,500 dwellings, with 3,500 dwellings desirable, based on an approximate walkable catchment of 100 gross hectares. It is noted that it is unlikely that this target would be reached by 2031 based on detail provided in the draft activity centre structure plan;
- The built form does not support the policy's notion of creating an activity centre with buildings that address the street with fewer blank walls. The development is considered for the most part to maintain the form of a typical suburban shopping centre, however with a higher degree of articulation;

- The service population (trade area) is proposed to be 158,090 by 2031, which is more than the indicative service population of up to 150,000 persons for a secondary centre;
- While the applicant has demonstrated acknowledgement of the targets set out in various state and local strategies and policies, the proposal is not considered to meet the targets set out in SPP 4.2 for various reasons discussed in this report;
- The end of journey facilities are not proposed in a location that could be conveniently accessed via the external cycle network, requiring cyclists to travel through main vehicular access points and through car parks;
- The number of bicycle spaces proposed is 55 spaces for customers in bicycle racks at entrances to the centre, and 75 spaces for staff at a secure compound with the end of journey facilities. This does not accord with the recommendation of the applicant's own transport assessment, which is based on the requirements to achieve a Green Star building accreditation. The amount is also less than the requirement of the policy for 5%-10% of all bays to be motor cycle/bicycle parking bays;
- A car parking management plan has not been prepared as part of the application to demonstrate how measures will be implemented to ensure car parking efficiency. It has been requested by the applicant that this be provided as a condition of any development approval issued;
- Pedestrian paths are provided around all key entrances to the shopping centre; however these paths are not extended around the entire portion of the new extension. Noticeably there appears to be no external connection between the shopping exits on the eastern side of the expansion to the northern exits. This limits potential for external pedestrian movements around less active areas of the shopping centre; and
- Whilst water reduction strategies have been indicated, it appears that these are only possible strategies that could be employed. The applicant has indicated the use of grey-water reuse systems but there is no indication on where these will be used. Furthermore, there does not appear to be any information provided on a water target the development will meet.

#### Assessment against the development requirements for the 'Commercial' zone under DPS2

The City's assessment against these development requirements is provided in Attachment 7. This assessment does not include the overall matters that should be considered by the City in determining the application, which is discussed further in the conclusion section of this report.

The City considers that proposed development generally meets the development requirements of DPS2, with the exception of:

- A minimum building setback of seven metres in lieu of nine metres to Banks Avenue;

- Car parking provision of 4,317 bays in lieu of 4,906 bays, based on the current car parking standard under DPS2. It is noted that a car parking standard proposed under the Omnibus Amendment to DPS2 would require 3,988 bays;
- A soft landscaping provision of 6.87% in lieu of 8% across the site;
- Landscaping strips where car parking abuts street property boundaries of nil in lieu of three metres; and
- Shade trees at a rate of approximately one tree per six car bays or less instead of one tree per four car bays;

#### *Local Planning Policies*

In accordance with the City's Environmentally Sustainable Design Policy, the sustainability checklist has been completed. This is provided in Attachment 11.

In accordance with the City's Signs Policy, where signage panels are indicated they can be approved as part of the application, without further need for development approval for signage within these areas. As full signage has not been indicated, any signage will be subject to further development approval. In the absence of a strategy it is unclear how signage will impact on the overall articulation of building facades.

#### Assessment against the draft Whitford Activity Centre Structure Plan

The City considers that the activity centre structure plan is not a 'seriously entertained planning proposal' for the reasons discussed earlier in this report. However, in the event that the JDAP considers it as such, the application has been assessed against its requirements.

The development is wholly contained within the Retail District of the structure plan. The assessment against the requirements for this district is provided in Attachment 8. The assessment outlines that, while the applicant has stated the development has been designed to comply with the structure plan, it is considered that the development fails to meet certain requirements, as follows:

- Ground floor to (the next) floor heights not proposed to be a minimum of 4.5 metres for the proposed development, with the service areas being less;
- Glazing to the active frontage of Marmion Promenade being 52% in area and 62% of the facade width - in lieu of 50% in area and 75% of the facade width;
- Limited pedestrian paths between car parking areas and mall entrances for the basement car park and roof level 2;
- Car parking within the Retail District portion of the development being at a ratio of 4.25 bays per 100m<sup>2</sup> instead of 4.5 bays per 100m<sup>2</sup>.
- The artist's impression indicates that a portion of the basement car park is not screened from public view. Furthermore, the new/modified at-grade car park from Whitfords Avenue and Marmion Avenue is not screened;

- No rationalisation of vehicle cross overs, with the cross over to be used by the service vehicles on Banks Avenue not indicated on the Structure Plan Map;
- The loading docks on Banks Avenue could reduce the amenity of residents of nearby properties as acoustic requirements may not be able to be achieved without a stringent management plan in place, reliant on third parties (truck drivers) and restricted delivery times to achieve compliance;
- No signage or detail being provided with the application to demonstrate how car parking direction and availability will be achieved. It has been requested that this detail will form part of a Parking Management Plan which should be required by way of condition of development approval;
- 55 customer bicycle spaces provided in lieu of 82 spaces;
- It is not certain how Crime Prevention Through Environmental Design principles have been achieved through the building design;
- Shade trees being provided at a rate of less than one tree per six car bays for some areas of the new/remodelled at grade and uncovered car parking areas;

#### Response to submissions

The following table outlines the key concerns raised during the public consultation period that directly relate to the proposed development. A full table of submissions is provided as Attachment 4 to this report.

<b>Issue Raised</b>	<b>Response from applicant</b>	<b>City Comments</b>
There is already too much traffic in the vicinity (including spill over into local streets), and this will increase as a result of the development (passenger vehicles, as well as service vehicles).	This comment is not substantiated. The traffic report shows that compliance can be achieved against standards and Westfield will be funding the necessary upgrades associated with the proposed development.	The City has concerns that the transport assessment has not adequately justified that the traffic generated by the development will not have a detrimental impact on the amenity of the locality now, or in the future.
Although development is concentrated on the eastern side of the centre, increased traffic throughout the vicinity will affect access to the school, and reduce the use of informal pick-off/drop-off facilities.	The concern is noted; however, based on the information provided we do not support these comments.  There has been discussion with the school, however there is clearly an existing issue with drop off and pick up which the development is neither responsible for nor will it exacerbate. The proposed structure plan offers more significant longer term solutions however its delivery requires cooperation and contribution by government and the school to gain an access from Whitford Avenue.	See comment above.

<p>Traffic improvements proposed appear only to benefit the development and not the area as a whole.</p>	<p>Noted. The established requirements under planning principles and case law require the developer to fund works to address infrastructure shortfalls created by development. The proposed works will benefit the broader locality, however it is not reasonable for the proponent to fund infrastructure beyond the need created by its development.</p>	<p>In the absence of an agreed Activity Centre Structure Plan, the City cannot conclusively determine what infrastructure (including traffic) upgrades will be needed as a result of development throughout the Activity Centre area. Although it isn't inappropriate for the upgrades resulting from proposed development only to relate to the issues caused by the development itself, this first needs to be assessed more holistically.</p>
<p>There are already parking issues at the centre.</p>	<p>The concern is noted; however, based on the information provided we do not support these comments.</p> <p>It is unclear what parking issues are referred to, however it is assumed that this reference refers to parking being at a premium at peak times. Parking surveys and assessments show that there is sufficient parking, however clearly this may not meet individual expectations. In line with contemporary planning and policy the transport report supports the proposed level of parking with associated management measures to achieve the appropriate balance going forward in meeting consumer requirements whilst not providing excessive parking and encouraging use of alternative transport modes.</p>	<p>The City's primary concern relating to provision of car parking is that a Parking Management Plan has not yet been developed to set out how the parking will be allocated and managed across the centre to maximise efficiency. Without this plan, the City cannot conclusively determine whether the amount of parking proposed for the development will be sufficient to cater for the needs of users.</p> <p>Other concerns relating to car parking that remain unresolved include the manner in which a mode-shift will occur to increase public transport utilisation, and cycling/walking to the centre.</p>
<p>The additional parking provided is not proportionate to the amount of retail floorspace.</p>	<p>Noted, refer above. In addition it is generally acknowledged that parking is not purely proportional, particularly where other management measures are proposed. The intention to increase spend in the centre is as much about better meeting existing customer needs than attraction of additional shoppers.</p>	<p>It is acknowledged that car parking requirements are generally based on a ratio of bays to floor area. The ratio does lessen with increased floor areas.</p> <p>Refer comment relating to previous issue above.</p>
<p>The development is not in-keeping with the Hillarys area, being higher than the</p>	<p>The concern is noted; however, based on the information provided we do</p>	<p>The City has concerns regarding some aspects of the built form, including the</p>



<p>current development and closer to Banks Avenue.</p>	<p>not support these comments.</p> <p>The development does not exceed any height requirements and remains primarily single storey. The increased intensity is in line with the framework anticipated under the draft structure plan (and SPP4.2) and representative of the broader changes within the locality as redevelopment and revitalisation takes place.</p>	<p>bulk and scale of the development as viewed from Banks Avenue, and the location of some proposed loading docks.</p>
<p>State Planning Policy 4.2 and removal of retail floor spaces was in recognition of a more comprehensive approach to deliver activity centres, rather than car-oriented shopping centres. This proposal is for a larger box, with all other elements to deliver an activity centre being left as the responsibility of others.</p>	<p>Noted. The proponents continue to pursue a structure plan over the activity centre which will facilitate the development of mixed use within the Endeavour and Banks Districts. The proposal is the first stage of development, with finalisation of the structure plan and Local Development Plans required prior to the development of the non-retail elements. The proposal is consistent with the current zoning and will not compromise the delivery of the broader strategic objectives established under SPP 4.2. Unlike other locations the process has been driven and funded by Westfield with a view to assisting the City meet its objectives under SPP 4.2.</p>	<p>The City is of the opinion that an agreed activity centre structure plan should be endorsed prior to the consideration of a development application for such extensive development. There is a concern with this approach that there will be no impetus for land uses other than retail to be developed at any particular point in the future. If this were to take place, then a more structured approach to the growth of the centre could occur, ensuring that the intent of State Planning Policy 4.2 is achieved.</p>
<p>The centre does not need more shops, and this will squeeze small businesses out.</p>	<p>Not substantiated. There is a demonstrated capacity for additional retail floor space and the additions and repositioning will assist the centre to remain competitive in the region to the benefit of local business through reducing leakage.</p>	<p>The City has concerns regarding the extent of shop retail area proposed and the potential impact this may have on the hierarchy of centres in the locality.</p>
<p>Development of this scale should be located in Joondalup - that is what it was designed for.</p>	<p>The concern is noted; however, based on the information provided we do not support these comments.</p> <p>Whitford is designated as a secondary centre and intended to be able to accommodate development</p>	<p>Although it may be possible for development of a large scale to be contemplated for Whitford Shopping Centre, as a secondary centre under State Planning Policy 4.2, the City has concerns regarding a proposal of this scale being considered prior to the</p>

	of this scale and function (in accordance with SPP 4.2). The hierarchy is retained as the centre will be smaller than Lakeside Joondalup following its current phase of development and significantly smaller than the broader Joondalup Activity Centre in the scale and range of use.	endorsement of a suitable activity centre structure plan.
There are other retail centres that serve the needs of the population, and this development is not warranted.	The concern is noted; however, based on the information provided we do not support these comments.  There is a demonstrated capacity for additional retail floor space, with the NW corridor currently undersupplied and significant expenditure and associated employment leaving the areas. This is addressed in the Retail Sustainability Assessment.	As outlined above, the City has concerns regarding the extent of retail floor space proposed as part of this development. This relates both to the impact that it may have on other centres within the region, and also the reduction of land use diversity within the Whitford Activity Centre.
The approval of this development is a wedge to overcome objections and issues with the structure plan. Should this development be approved it is inevitable that structure plan would be approved.	A structure plan is required over activity centres, however the proposed development neither prevents the delivery of the mixed use districts nor pre-empt any changes which may be made to these components of the structure plan.	The City does not agree with the contents of this submission.  The City recommends that the application be refused for the reasons set out at the start of this report. However, in the event that the development application is approved, this would not prevent the City from resolving any other outstanding issues with the structure plan.
There are inconsistencies in the Retail Sustainability Assessment. Taking this into account the development will have a significant impact on the hierarchy of centres, and affect the primacy of the Joondalup City Centre.	Disagree. It is unclear what inconsistencies are alleged; however there is no evidence of the proposal undermining the hierarchy of centres. In contrast the proposal will ensure that the centre is able to remain competitive within the hierarchy which is also a key objective of SPP4.2.	The City has appointed an independent consultant to review the contents of the Retail Sustainability Assessment. The advice received from that review is that the Centre could expand to between 65,000m <sup>2</sup> and 75,000m <sup>2</sup> of retail floor space before it impacts on centres in the locality.
The development will result in increased noise, pollution, anti-social behaviour, and reduced amenity for surrounding residents.	The proposal will enhance the amenity through improving the range of services and substantially improving the address to the public realm. The proposal is an important step in the broader enhancement and	The City has expressed some concerns through this report about various aspects of the proposed development that may impact on the amenity of surrounding residents.

	transition of the activity centre.	
The exceptional circumstances provided by the applicant are commercial reasons or based on a structure plan that is in the very early stages of development. These are not considered exceptional circumstances.	As outlined in our letter dated 28 August, exceptional circumstances are considered to exist based on a range of factors. Westfield has actively sought to progress planning for the area for the last three years and development needs to be progressed.	As set out earlier in this report, the City is of the opinion that the 'exceptional circumstances' outlined by the applicant in their submission, are not circumstances which would warrant consideration of the application ahead of the endorsement of an agreed activity centre structure plan.
Should this proposal be accepted based on exceptional circumstances, it will set a precedent for other development within the structure plan area to proceed.	This proposal is able to be considered under the current zoning and framework. Other precincts within the structure plan require rezoning, structure plan and Local Development Plans prior to development, therefore no precedent will be set. In relation to other centres, should similar efforts be undertaken or barriers be encountered it would be suitable for exceptional circumstances be applied.	The City is of the opinion that determination of this application will not set a precedent for determination of future development applications within the structure plan area.  However, it is noted that the applicant's response sets out that various planning instruments would need to be in place prior to consideration of applications within other districts of the structure plan area, including an activity centre structure plan. That arguably is also the case for this application.
This development is purely for the benefit of Westfield, with no benefit to the community.	The proposal will enhance the amenity of the centre and improve the range of services to better meet the needs of the community. The proposal is the first phase of the enhancement and transition of the centre to provide a more diverse and sustainable activity centre over time.	The submitter's and applicant's comments in relation to this issue are noted.

### Conclusion:

In formulating its recommendation on this proposal, the City has considered the applicant's contention that 'exceptional circumstances' exist, which warrant the consideration of the development application prior to the endorsement of an agreed activity centre structure plan. The City is of the opinion that the circumstances put forward in formulating this argument are not 'exceptional' on the basis that:

- any agreement or contract with an existing or future tenant is a commercial consideration and not a planning consideration;
- the draft Whitford Activity Centre Structure Plan has not reached a point where it should be considered 'seriously entertained', and if it were to be considered in this manner, should be afforded very little weight; and

- the process and delays that have occurred in relation to the draft Whitford Activity Centre Structure Plan, do not directly relate to this development application, and could have been reduced if the applicant had sought for the City to request the preparation of the structure plan ahead of the scheme amendment being undertaken.

Notwithstanding the above argument that 'exceptional circumstances' do not exist, the City has conducted a full assessment of the development application against the requirements of State Planning Policy 4.2, the City of Joondalup District Planning Scheme No. 2 and the draft Whitford Activity Centre Structure Plan. This has been undertaken to ensure that a full understanding of the proposal is able to be presented in the event that the DAP considers that these circumstances do in fact warrant consideration of the development application.

The proposal is considered not to fully align with the intent or provisions of State Planning Policy 4.2, particularly in relation to the amount of retail floor space proposed, and the low land use diversity target achieved. The proposed development being comprised entirely of retail floor space, effectively lowers the land use diversity of the activity centre, to be the equivalent of a centre with retail floorspace of between 10,000m<sup>2</sup> and 20,000m<sup>2</sup>. Furthermore, the retail sustainability assessment fails to justify that the proposed amount of retail floor space will not impact on the hierarchy of centres in the locality. The City has received independent advice about the appropriate amount of shop-retail that could be accommodated within the Whitford Activity Centre. The figures provided in this advice were based on calculations undertaken using the information provided in the applicant's retail sustainability assessment, and the advice concludes that between 65,000m<sup>2</sup> and 75,000m<sup>2</sup> of retail floorspace could be accommodated within the activity centre. Once the floorspace exceeds this amount, the development of this centre could have the potential to impact on other nearby centres.

Several aspects of the proposed development's built form are considered not to be appropriate outcomes for the locality, and do not assist in achieving the aspirations of State Planning Policy 4.2. The City's primary concerns in this regard relate to:

- the scale of the proposed 'department store' and 'discount department store' building, and lack of activation of these structures at the human scale will adversely impact on the amenity of the locality, in particular the residential properties on the southern side of Banks Avenue.
- deterrents to external pedestrian circulation around the centre, including the inconsistent provision of pedestrian shelters, awnings, and paths around the buildings, and the under provision of glazing in areas beyond key entry points, which if provided would serve to activate entire building facades.
- the location of service yards in close proximity to residential properties, particularly on the southern side of Banks Avenue, has the potential to impact on the amenity of those residents if strict noise management procedures are not adhered to. Furthermore, the utilisation of Banks Avenue to access these service yards does not align with the intent of State Planning Policy 4.2 to utilise major roads only. The proposed service yard located near the corner of Marmion Avenue and Whitfords Avenue, does not serve to activate this corner, or increase the vibrancy of the centre as a whole.
- pedestrian movements around the centre are restricted or limited as a result of the location of loading docks and service yards and the design of car parks. The paths provided discourage movement and circulation around the centre,

and only provides for full circulation through the shopping centre itself. Furthermore, the lack of provision of pedestrian paths and crossing points within some of the proposed car parking area does not allow for safe pedestrian movements between a parked vehicle and entrances to the centre.

- the proposal not fully demonstrating that the principles of the State Government's Designing Out Crime Planning Guidelines (CPTED) have been satisfied through the design of the development. Sufficient information has not been provided to demonstrate that areas such as loading docks, end of journey facilities, the 'village green' area, and other screened off areas not visible from the public realm will not become entrapment spaces. The City has also not received sufficient information regarding lighting of spaces external to the centre.

The transport assessment submitted by the applicant, was reviewed by consultants appointed by the City. Concerns were raised and further clarification was subsequently sought from the applicant. No changes were made to the development proposal as a result, but additional justification and commentary was provided by the applicant. These points of clarification have not been reviewed again by the City's consultants, due to time constraints. The concerns that were raised included:

- volume and distribution of traffic, and impact on the surrounding road network.
- not accounting for future developments in the activity centre area, could compromise the delivery of future developments which are necessary in order to achieve other policy targets and requirements.
- modifications that require the approval of Main Roads WA, do not have the necessary endorsement to do so. If these changes, including alterations to traffic light cycle times and creation of a new entrance to the centre from Marmion Avenue, are not able to proceed, this will also have impacts on the surrounding road network and the performance of intersections.
- access to end of journey facilities, and internal connections to the external cycle network.

Overall, it is considered that the timing and design of the proposed development are not appropriate. The requirements under Clause 9.11 of the City of Joondalup District Planning Scheme No. 2 are not satisfied, and 'exceptional circumstances' are considered not to exist under State Planning Policy 4.2. Notwithstanding the existence or not, of 'exceptional circumstances' the development application is considered premature, and does not align with the intent or provisions of State Planning Policy 4.2.

It is therefore recommended that the development application be refused.




District Planning Scheme No.2



LEGEND

SCALE 1: 7500





 Boundary of Amendment  
Zone Area

METROPOLITIAN REGION SCHEME RESERVES

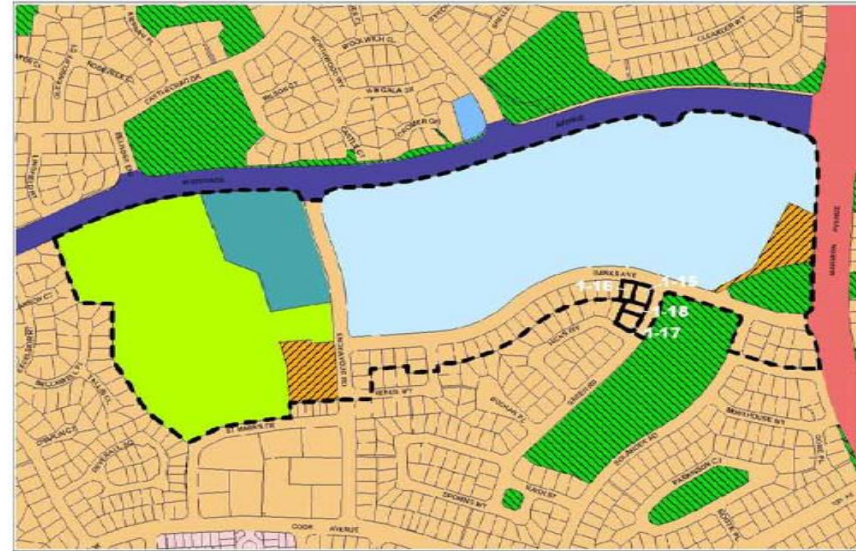
 Primary Regional Road  
 Other Regional Road

LOCAL RESERVES

 Parks and Recreation  
 Civic and Cultural

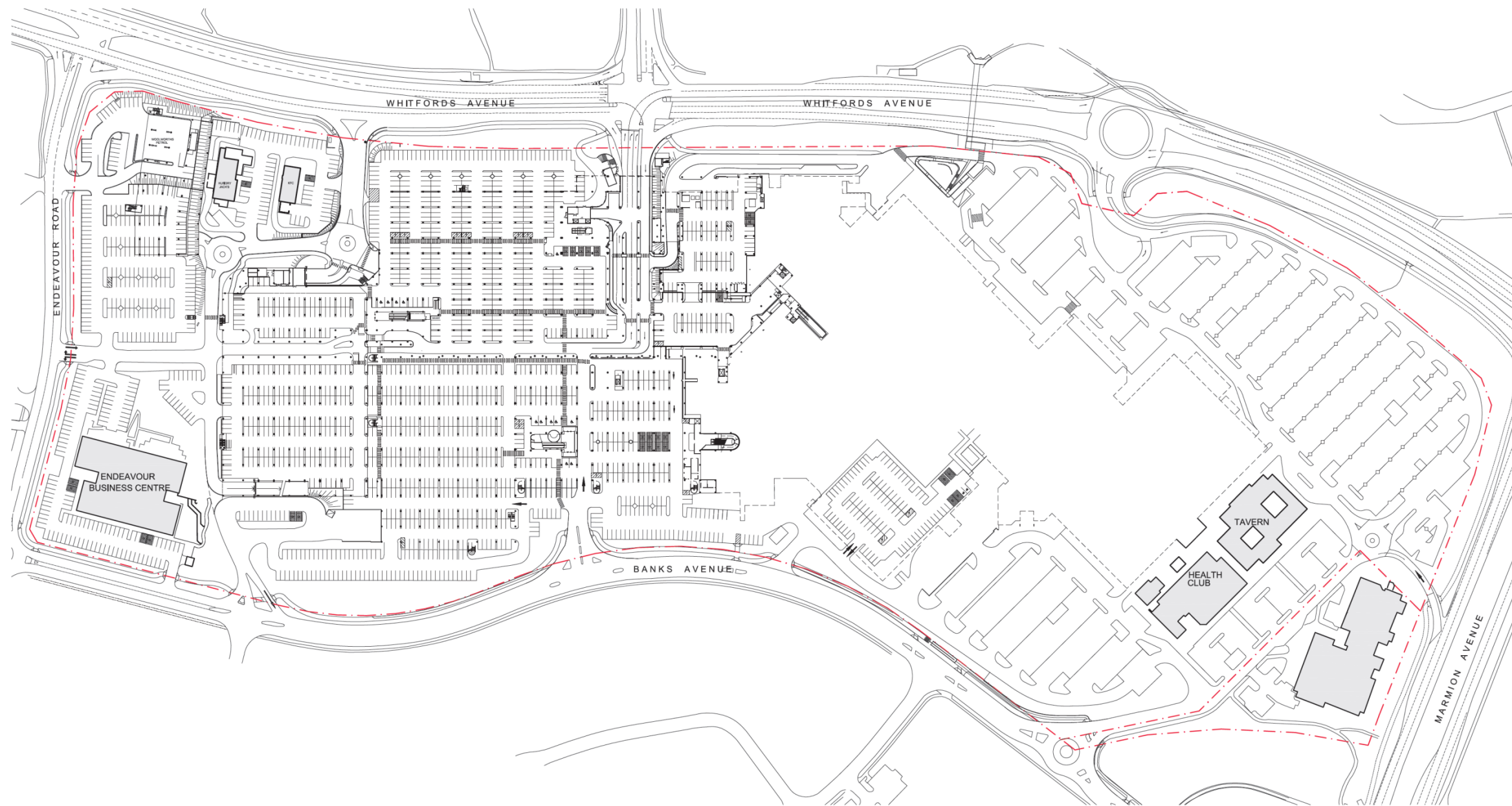
ZONES

 Residential  
 Urban Development  
 Commercial  
 Business  
 Mixed Use  
 Centre  
 Private Clubs / Recreation  
 Special Zone - Additional Use  
1-15 \_ Medical Centre  
1-16 \_ Medical Centre  
1-17 \_ Medical Centre  
1-18 \_ Medical Centre



EXISTING ZONING

Plan dated 4 July 2013



**EXISTING BASEMENT LEVEL**  
SCALE 1:1000@B1

**EXISTING BASEMENT LEVEL**  
**WHITFORD CITY**

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details



Scale 1:1000	Project No. 11310
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Date JULY 2013
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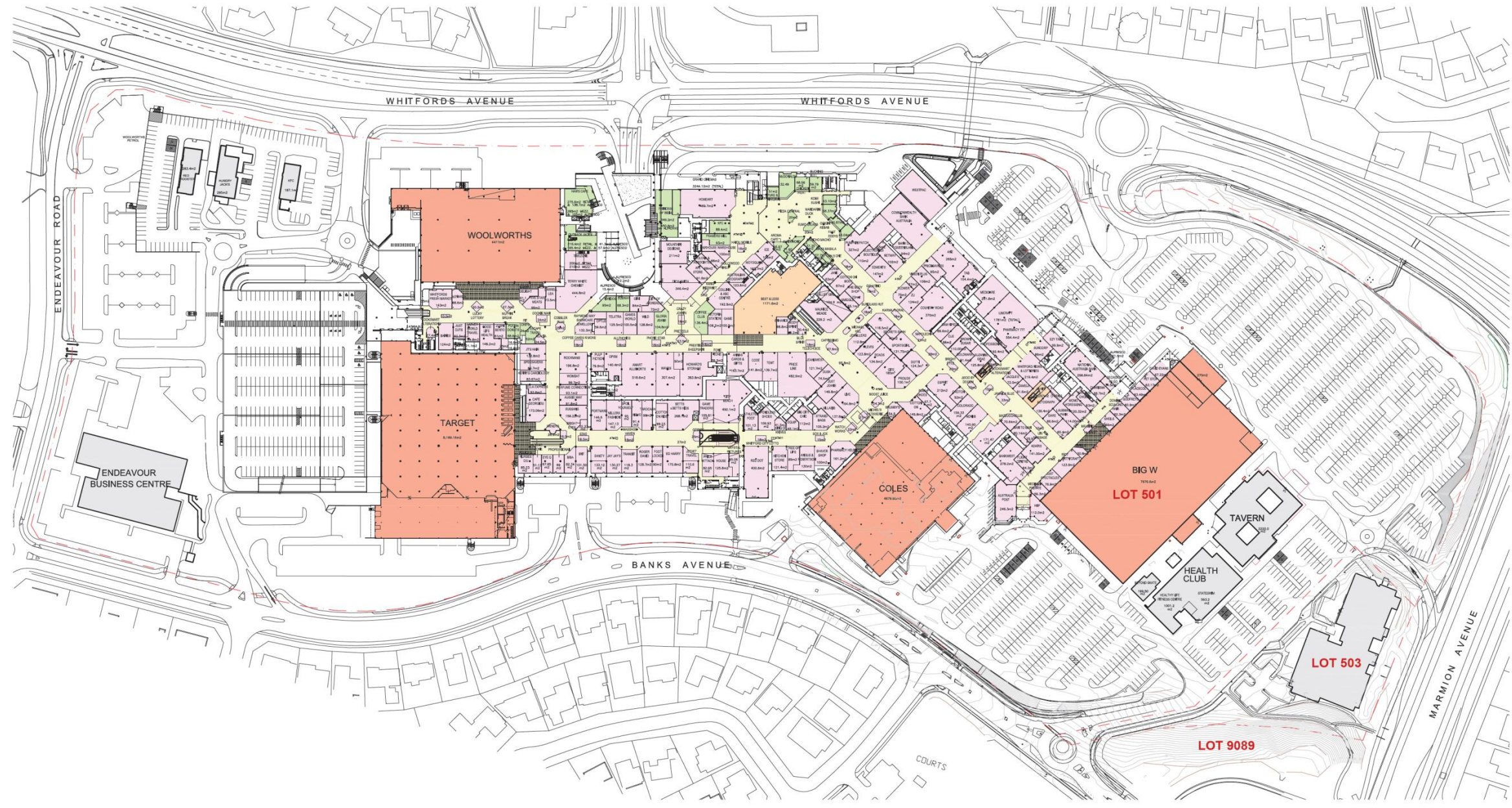
Drawing no. EX-01	Revision A
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**DEVELOPMENT APPLICATION**





Plan dated 4 July 2013



EXISTING LEVEL 1  
**WHITFORD CITY**

Notes:  
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**Westfield**  
RETAIL TRUST

**GIC**

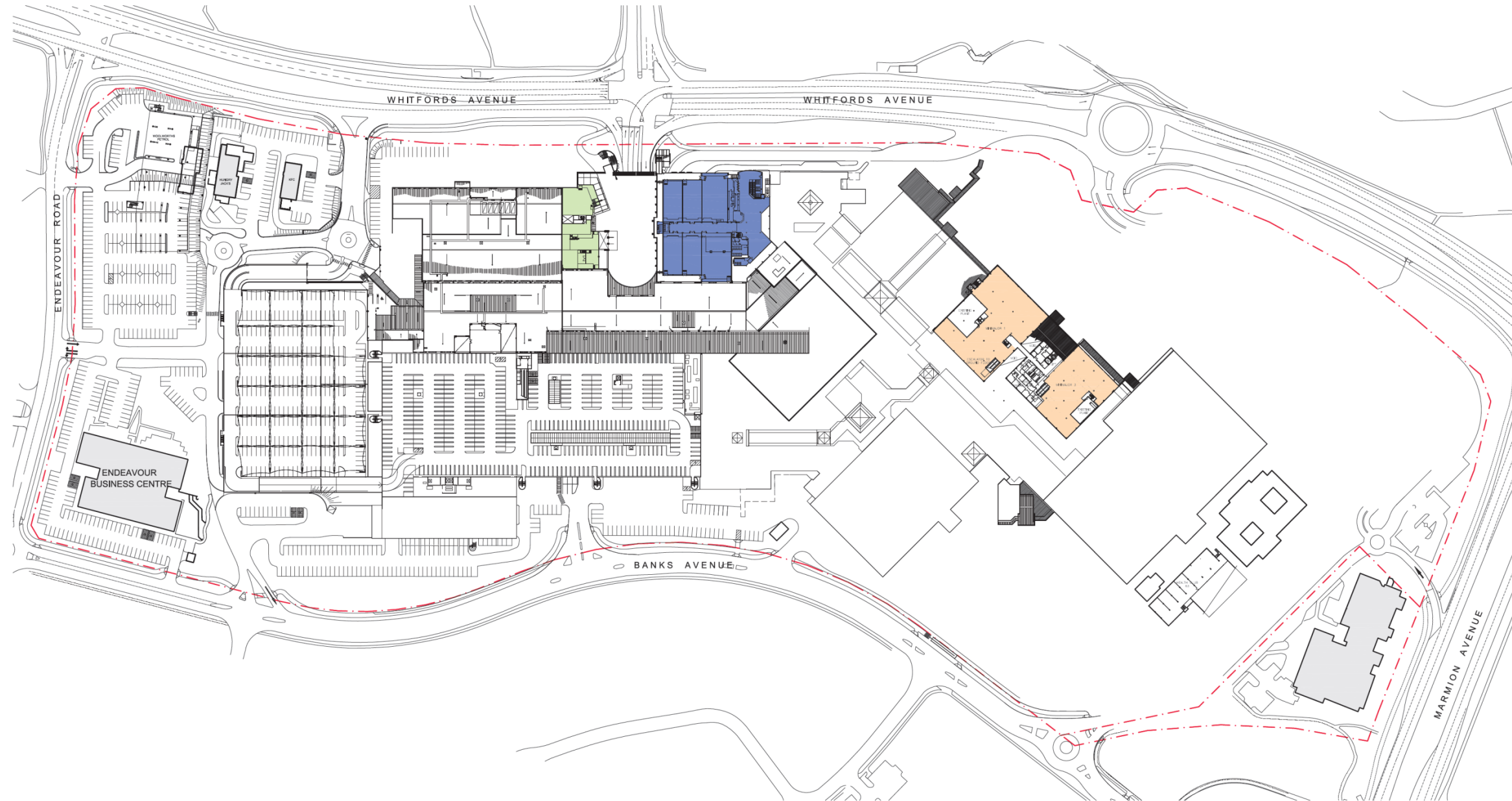
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	Date JULY 2013
Drawing no. EX-02	Revision A

**EXISTING LEVEL 1**  
SCALE 1:1000@B1

**DEVELOPMENT APPLICATION**



Plan dated 4 July 2013



**EXISTING LEVEL 2 / ROOF**  
**WHITFORD CITY**

Notes:  
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Scale 1:1000	Project No. 11310
	Date JULY 2013
Drawing no. EX-03	Revision A

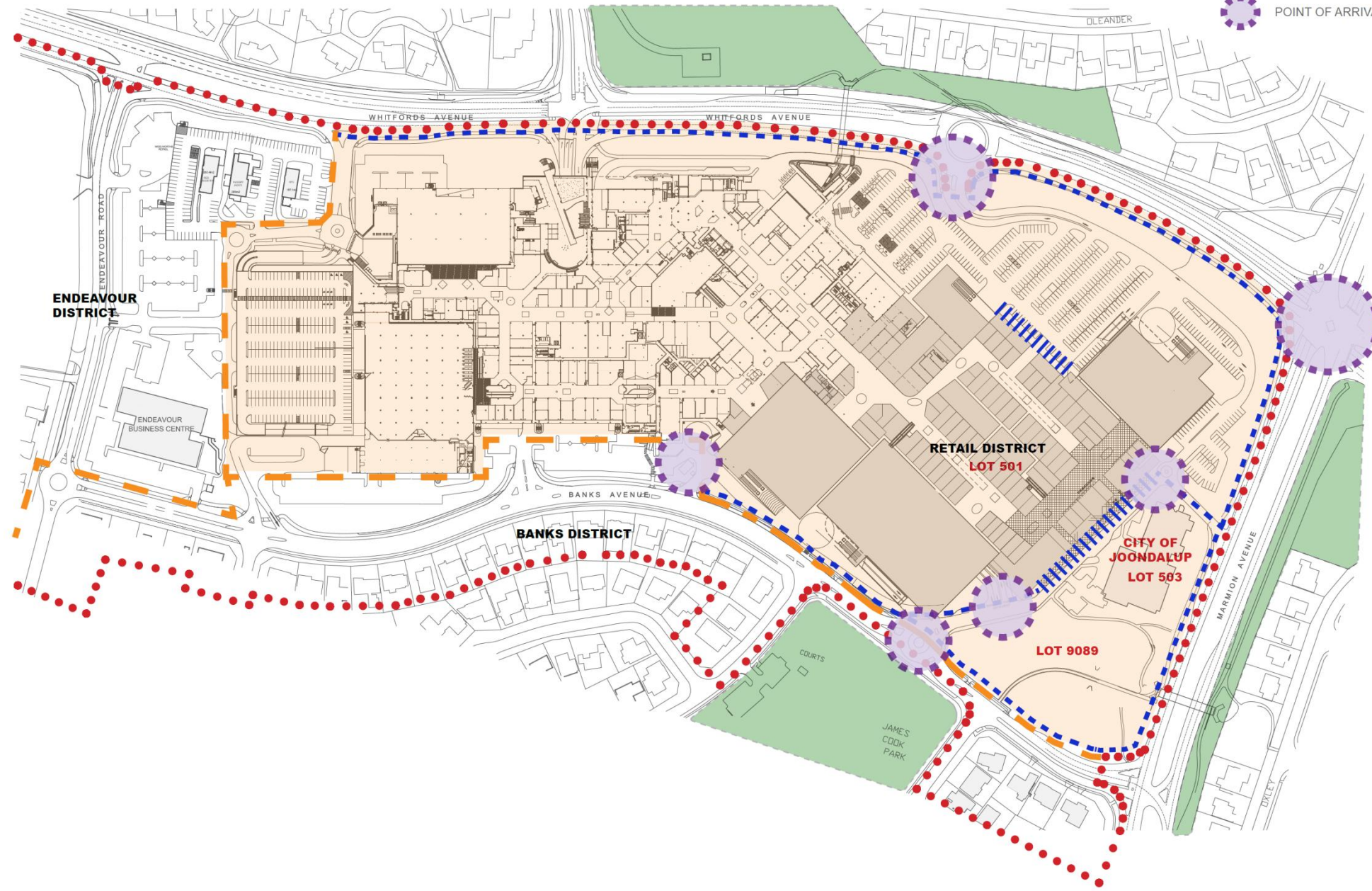
**DEVELOPMENT APPLICATION**



**EXISTING LEVEL 2 / ROOF**  
**SCALE 1:1000@B1**

Plan dated 30 August 2013

- LEGEND**
- WHITFORD ACTIVITY CENTRE STRUCTURE PLAN BOUNDARY
  - ▭ RETAIL DISTRICT
  - |||| ACTIVITY FRONTAGE
  - - - ATTRACTIVE FRONTAGE
  - PUBLIC OPEN SPACE
  - ⊗ POINT OF ARRIVAL



RETAIL DISTRICT DIAGRAM

DEVELOPMENT APPLICATION

**RETAIL DISTRICT DIAGRAM  
WHITFORD CITY**

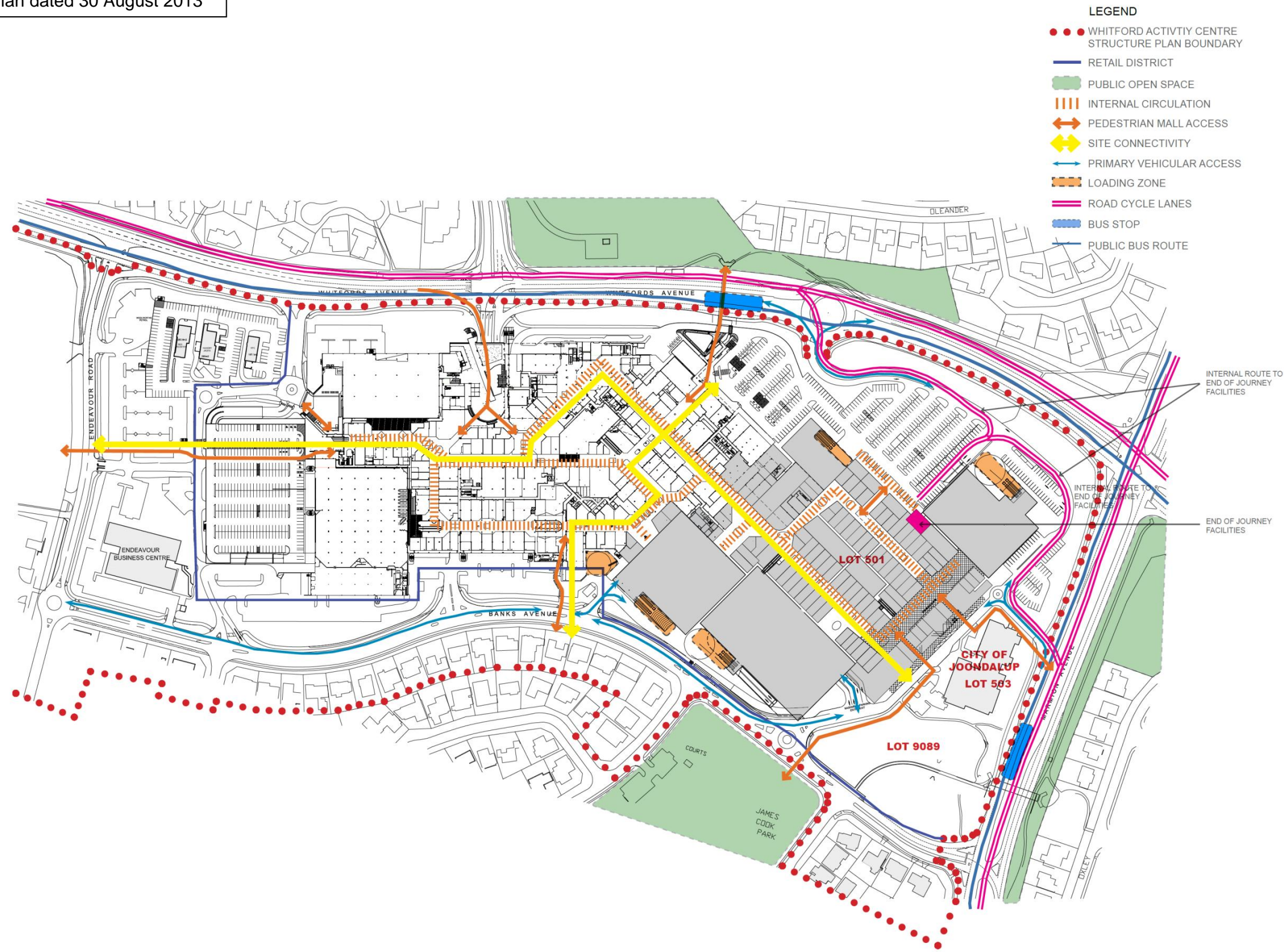
Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details



Scale 1:1500	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-01	Revision B



Plan dated 30 August 2013



PROPOSED ACCESS AND MOVEMENT DIAGRAM

RETAIL DISTRICT ACCESS AND MOVEMENT DIAGRAM

WHITFORD CITY

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details

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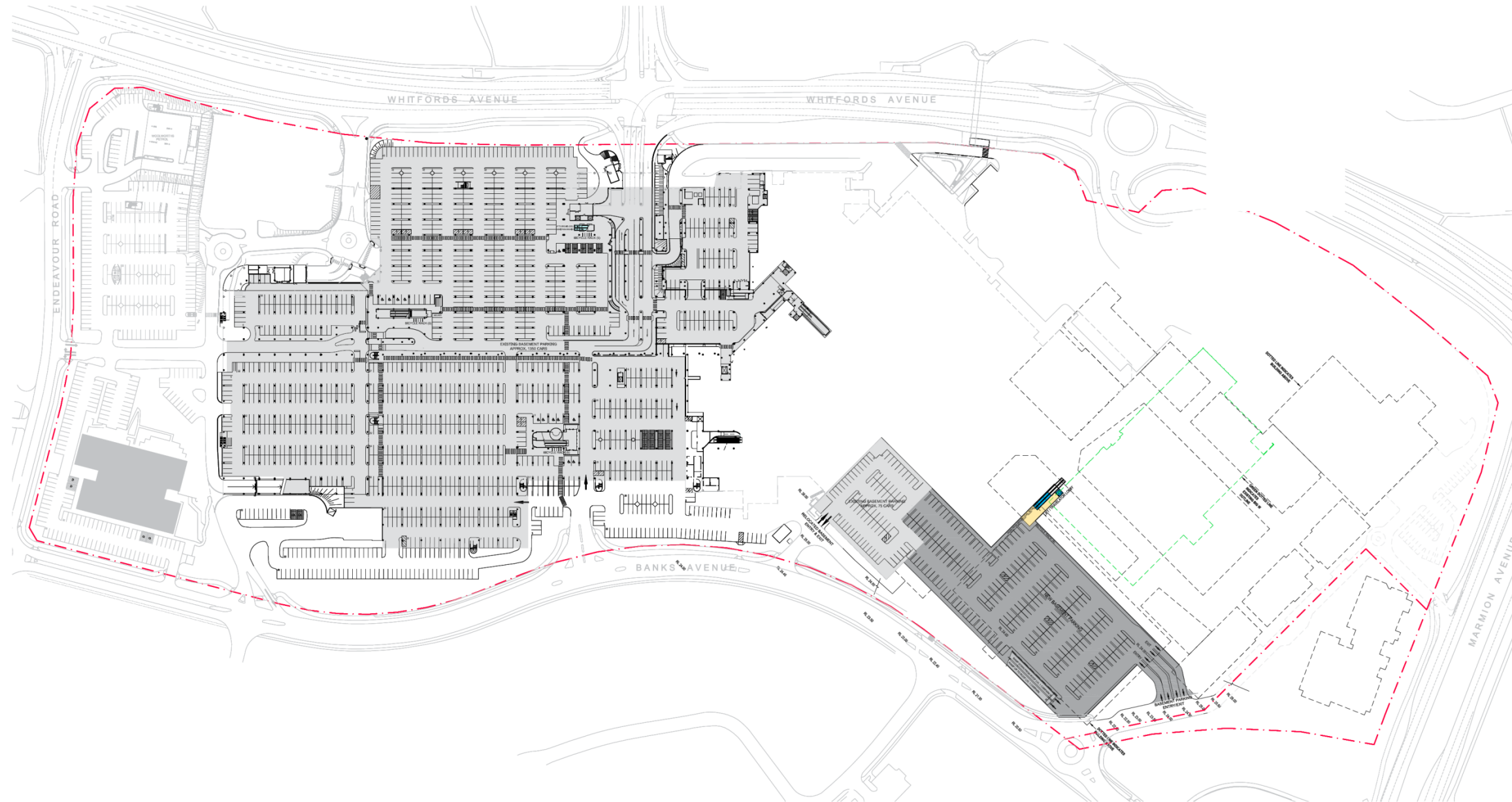
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Scale 1:1500	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-03	Revision B

DEVELOPMENT APPLICATION



Plan dated 30 August 2013



**PROPOSED BASEMENT LEVEL**  
SCALE 1:1000@B1

**PROPOSED BASEMENT LEVEL**  
**WHITFORD CITY**

Notes:  
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**Westfield**  
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**Westfield**  
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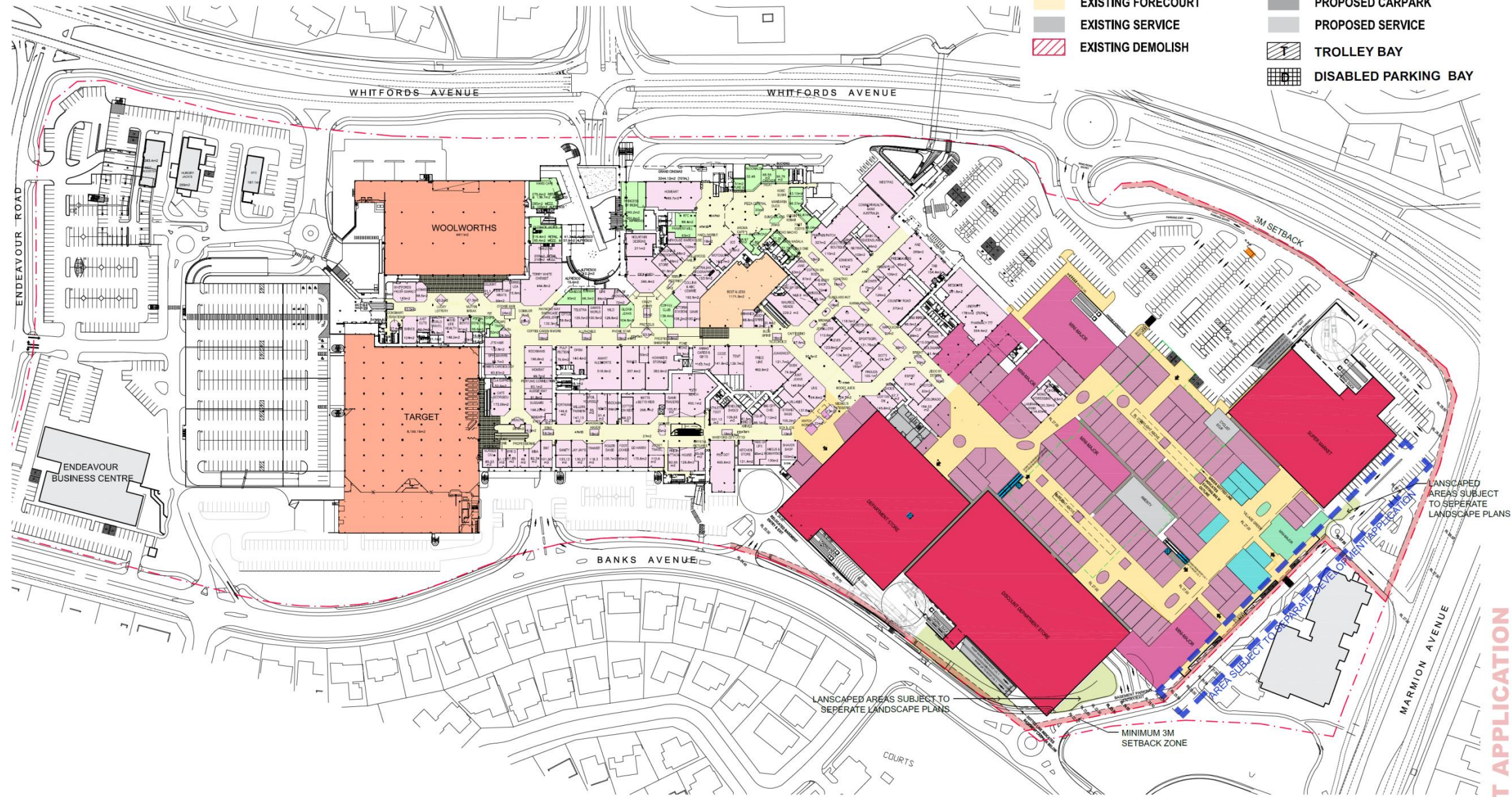
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Scale 1:1000	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-04	Revision B



**DEVELOPMENT APPLICATION**

Plan dated 30 August 2013



**PROPOSED LEVEL 1**  
**WHITFORD CITY**

Notes:  
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GIC
























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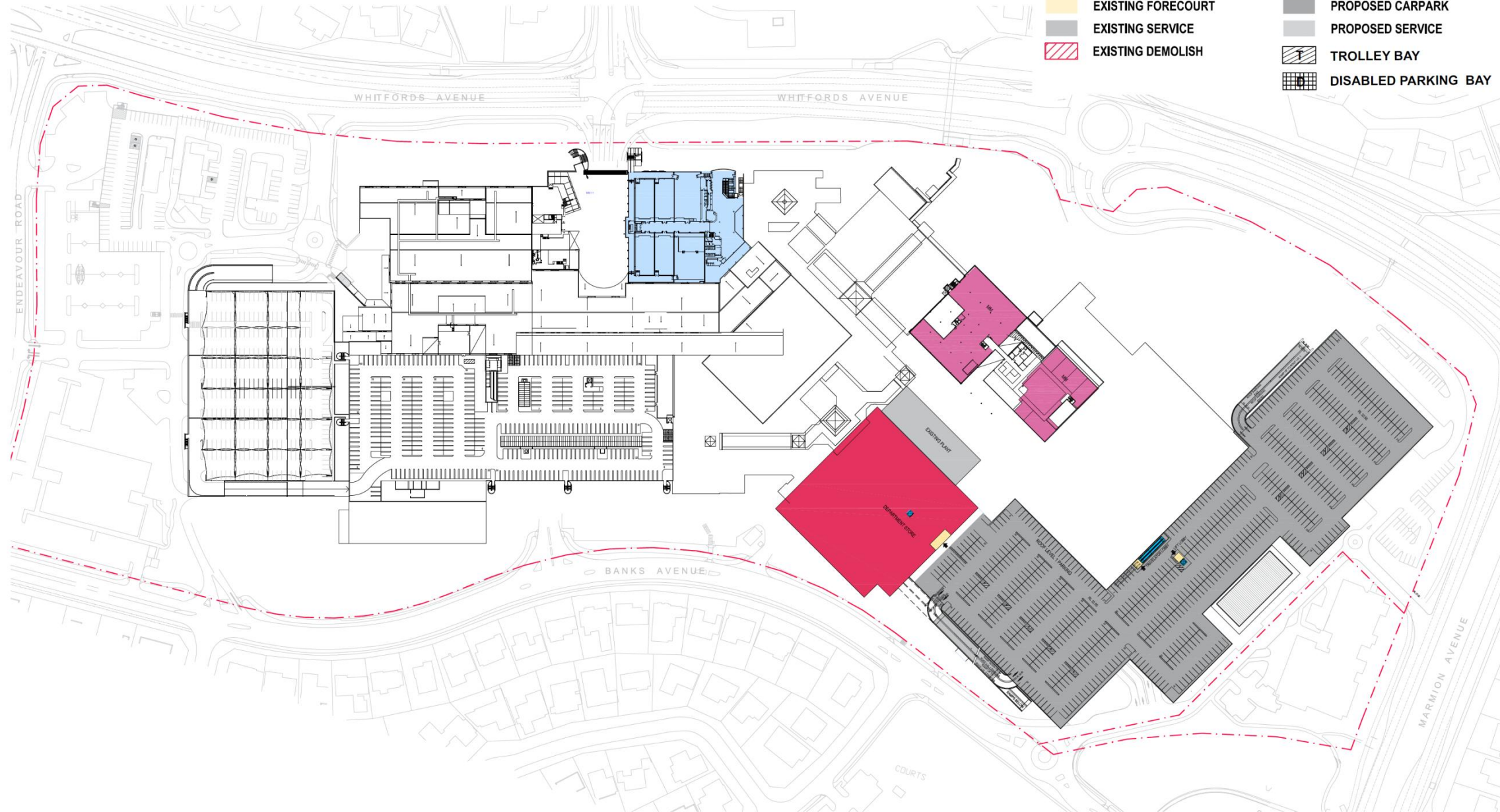
**PROPOSED LEVEL 1**  
**SCALE 1:1000@B1**



**DEVELOPMENT APPLICATION**

Plan dated 30 August 2013

- LEGEND
- |   |                             |   |                             |
|---|-----------------------------|---|-----------------------------|
|  | EXISTING MAJOR              |  | PROPOSED MAJOR              |
|  | EXISTING MINI-MAJOR         |  | PROPOSED MINI-MAJOR         |
|  | EXISTING SPECIALTY & KIOSK  |  | PROPOSED SPECIALTY & KIOSK  |
|  | EXISTING CINEMA             |  | PROPOSED CINEMA             |
|  | EXISTING MALL               |  | PROPOSED MALL               |
|  | EXISTING FOOD               |  | PROPOSED FOOD               |
|  | EXISTING VERTICAL TRANSPORT |  | PROPOSED DINING             |
|  | EXISTING CARPARK            |  | PROPOSED VERTICAL TRANSPORT |
|  | EXISTING FORECOURT          |  | PROPOSED CARPARK            |
|  | EXISTING SERVICE            |  | PROPOSED SERVICE            |
|  | EXISTING DEMOLISH           |  | TROLLEY BAY                 |
|   |                             |  | DISABLED PARKING BAY        |



**PROPOSED LEVEL 2 / ROOF LEVEL 1  
WHITFORD CITY**

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details


























Scale 1:1000	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-06	Revision B

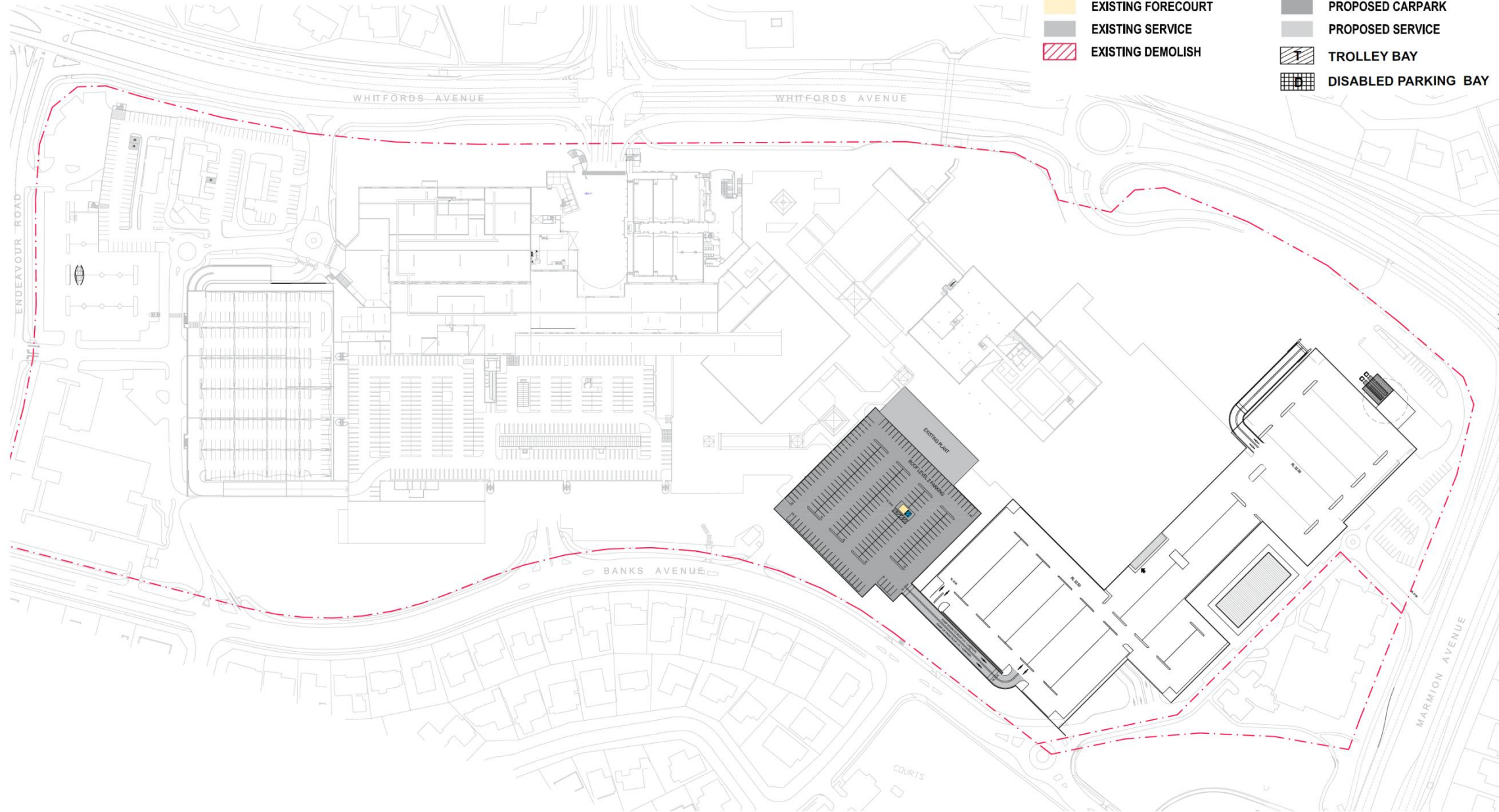
**PROPOSED LEVEL 2 / ROOF LEVEL 1  
SCALE 1:1000@B1**



**DEVELOPMENT APPLICATION**

Plan dated 30 August 2013

- LEGEND
- |   |                             |   |                             |
|---|-----------------------------|---|-----------------------------|
|  | EXISTING MAJOR              |  | PROPOSED MAJOR              |
|  | EXISTING MINI-MAJOR         |  | PROPOSED MINI-MAJOR         |
|  | EXISTING SPECIALTY & KIOSK  |  | PROPOSED SPECIALTY & KIOSK  |
|  | EXISTING CINEMA             |  | PROPOSED CINEMA             |
|  | EXISTING MALL               |  | PROPOSED MALL               |
|  | EXISTING FOOD               |  | PROPOSED FOOD               |
|  | EXISTING VERTICAL TRANSPORT |  | PROPOSED DINING             |
|  | EXISTING CARPARK            |  | PROPOSED VERTICAL TRANSPORT |
|  | EXISTING FORECOURT          |  | PROPOSED CARPARK            |
|  | EXISTING SERVICE            |  | PROPOSED SERVICE            |
|  | EXISTING DEMOLISH           |  | TROLLEY BAY                 |
|   |                             |  | DISABLED PARKING BAY        |



**PROPOSED ROOF LEVEL 2**  
**WHITFORD CITY**

Notes:  
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Scale 1:1000	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-07	Revision B

**DEVELOPMENT APPLICATION**

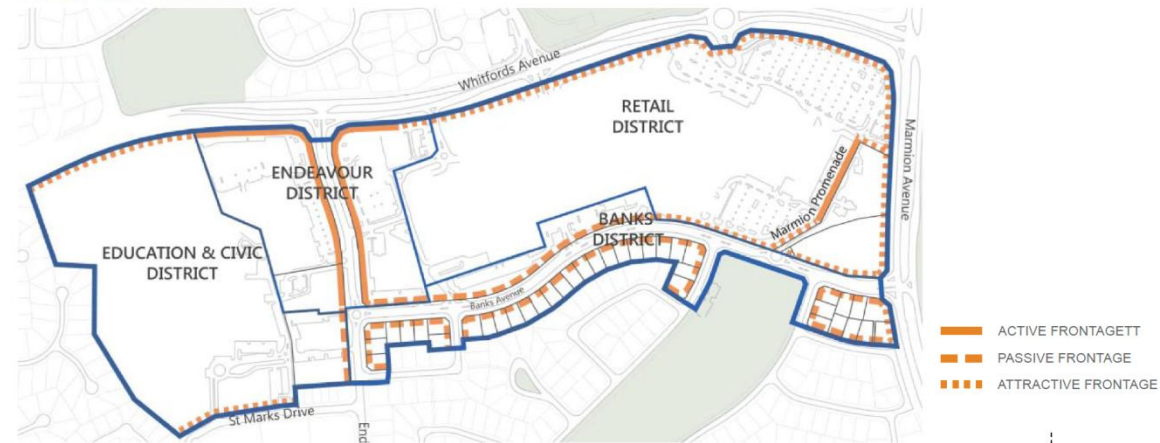


**PROPOSED ROOF LEVEL 2**  
**SCALE 1:1000@B1**



Plan dated 30 August 2013

WHITFORD ACTIVITY CENTRE STRUCTURE PLAN  
PART 1.11 STREET INTERFACE



PROPOSED LEVEL 1 DETAIL - EAST  
SCALE 1:500@B1

ACTIVE FRONTAGE

DEVELOPMENT APPLICATION

PROPOSED LEVEL 1 DETAIL - EAST  
WHITFORD CITY

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details.



Scale 1:500	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-08	Revision B



Plan dated 30 August 2013



**PROPOSED LEVEL 1 DETAIL - NORTH**  
SCALE 1:500@B1

DEVELOPMENT APPLICATION

**PROPOSED LEVEL 1 DETAIL - NORTH**  
**WHITFORD CITY**

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details

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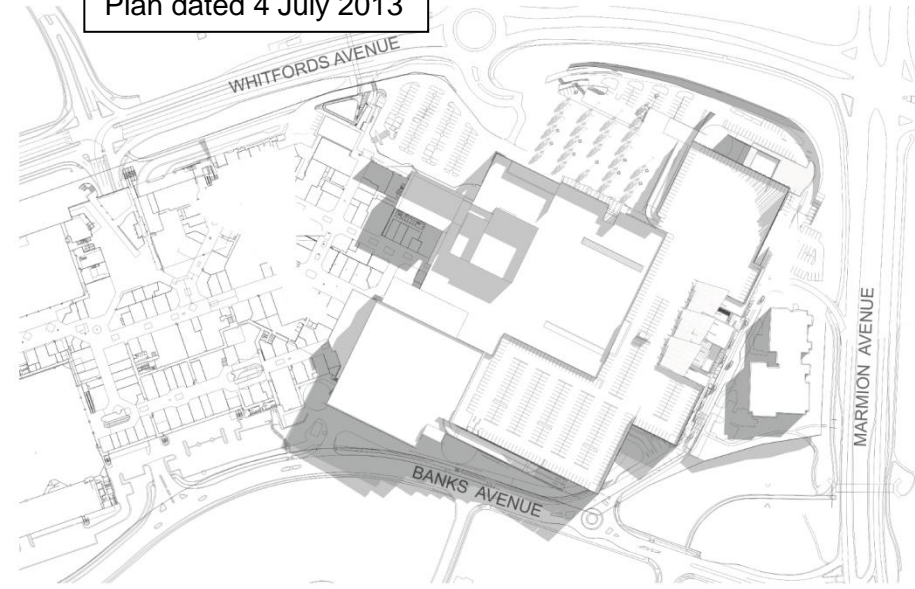
**Westfield**  
RETAIL TRUST

**GIC**

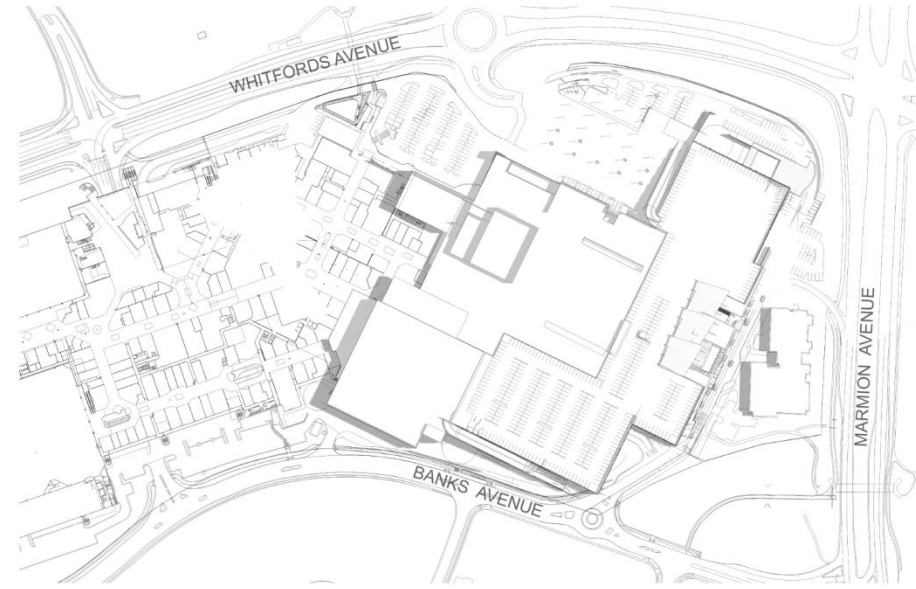
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	Date AUGUST 2013
Drawing no. DA-09	Revision B



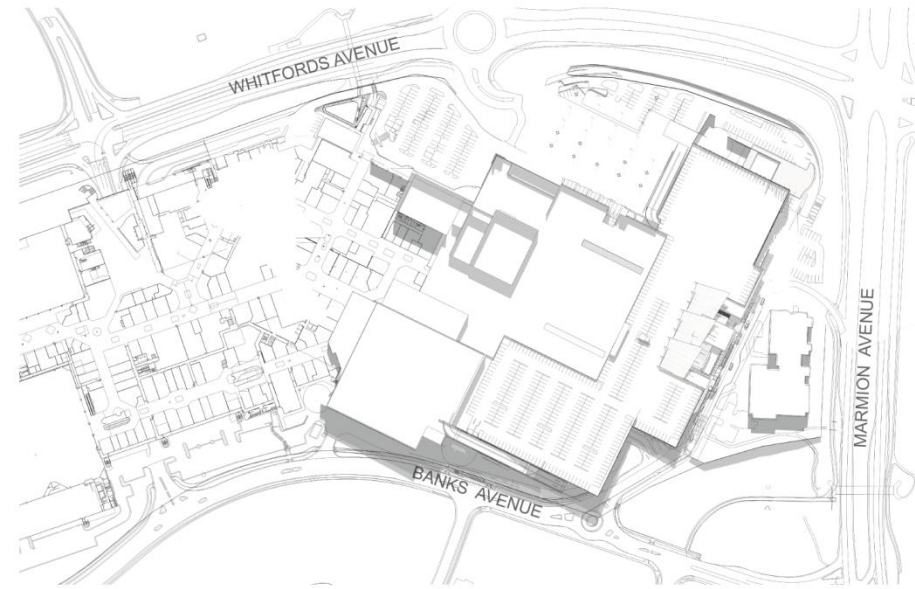
Plan dated 4 July 2013



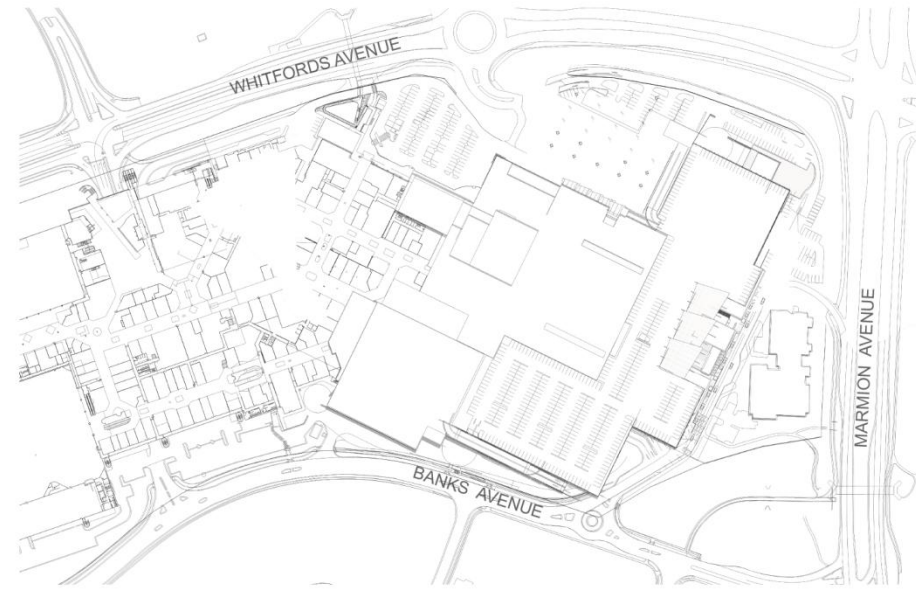
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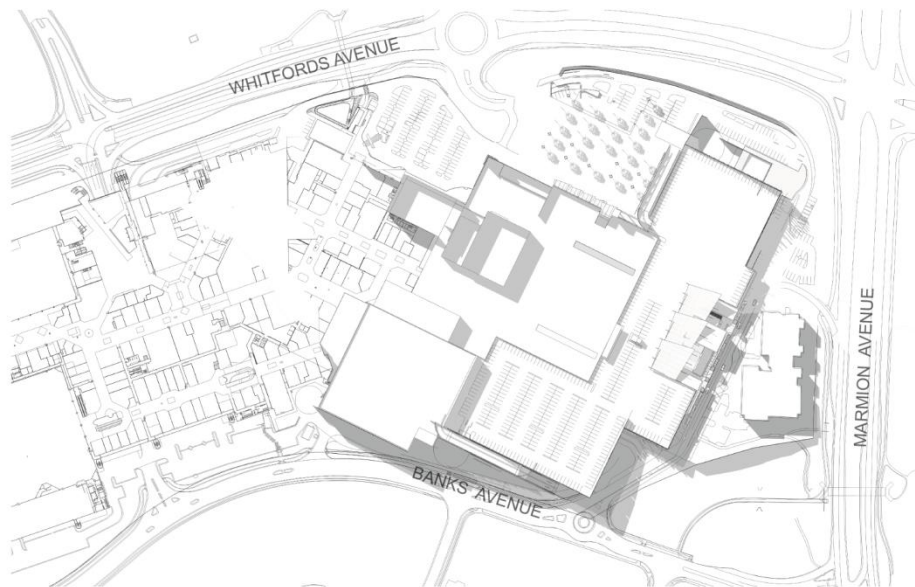
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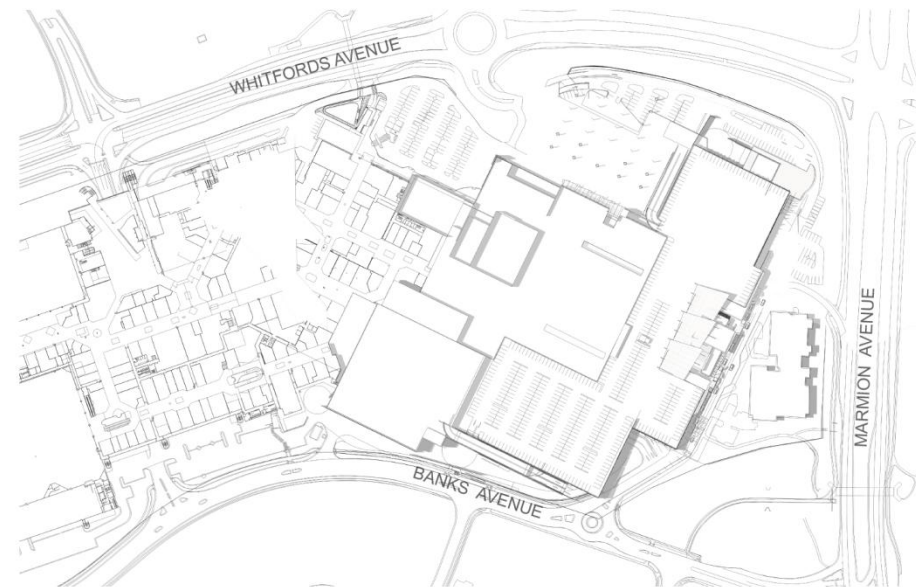
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21<sup>st</sup> DEC 12 NOON



21<sup>st</sup> JUNE 3 PM



21<sup>st</sup> DEC 3 PM



DEVELOPMENT APPLICATION

SHADOW DIAGRAMS  
**WHITFORD CITY**

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details

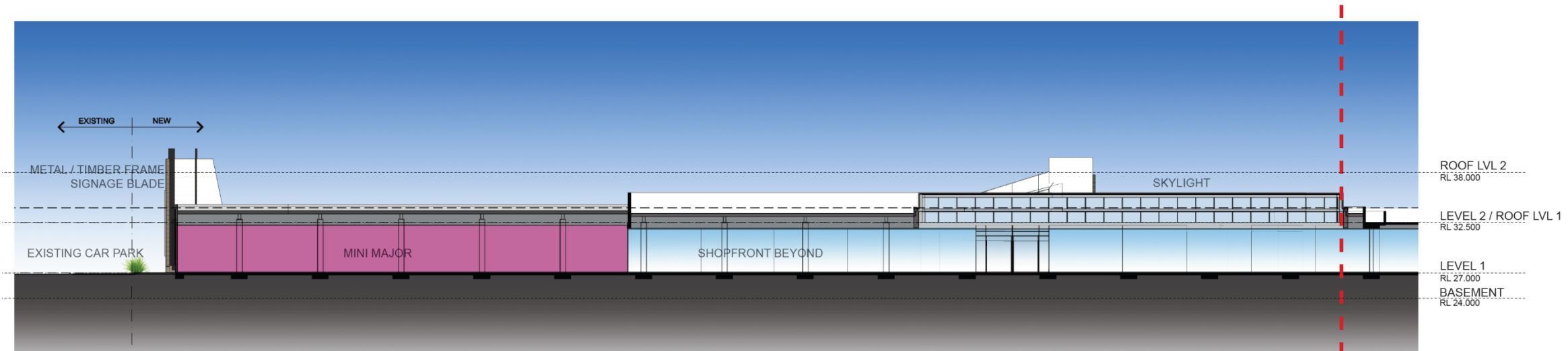
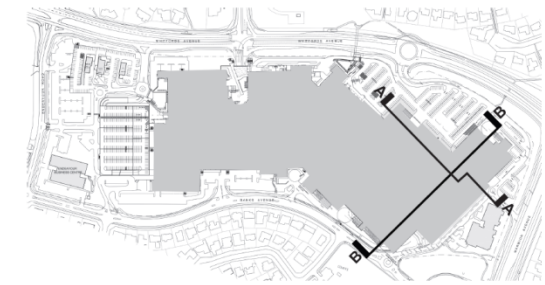
**Westfield**  
Westfield Design & Construction Pty Ltd

**Westfield**  
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**GIC**

Scale	Project No.
NTS	11310
Date	Date
JULY 2013	JULY 2013
Drawing no.	Revision
DA-10	A

Plan dated 4 July 2013



PROPOSED SECTION A-A  
PART 1



PROPOSED SECTION A-A  
PART 2

DEVELOPMENT APPLICATION

PROPOSED SECTION A-A  
WHITFORD CITY

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details.

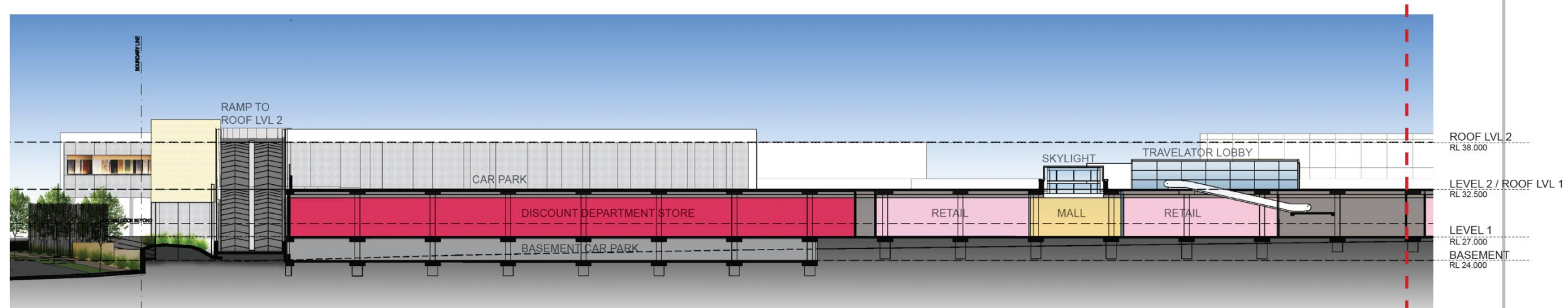
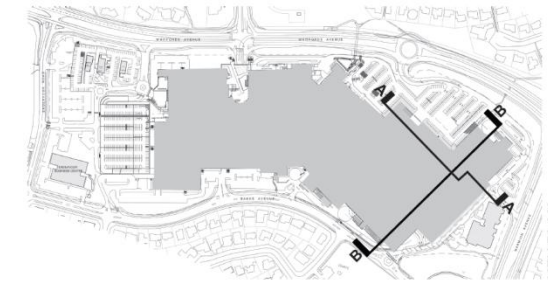
**Westfield**  
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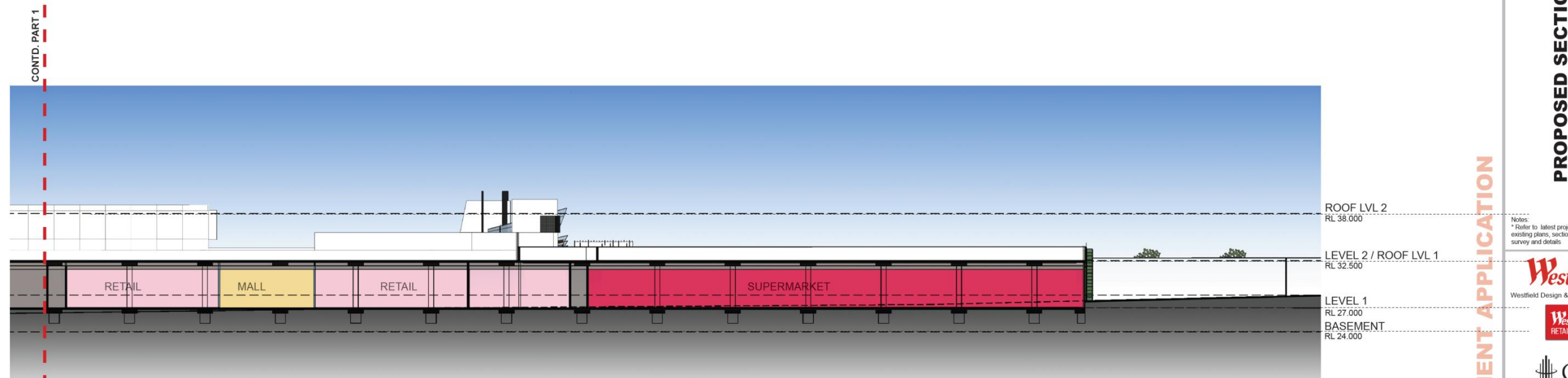
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Scale 1:200	Project No. 11310
	Date JULY 2013
Drawing no. DA-11	Revision A

Plan dated 4 July 2013



PROPOSED SECTION B-B  
PART 1



PROPOSED SECTION B-B  
PART 2

PROPOSED SECTION B-B  
**WHITFORD CITY**

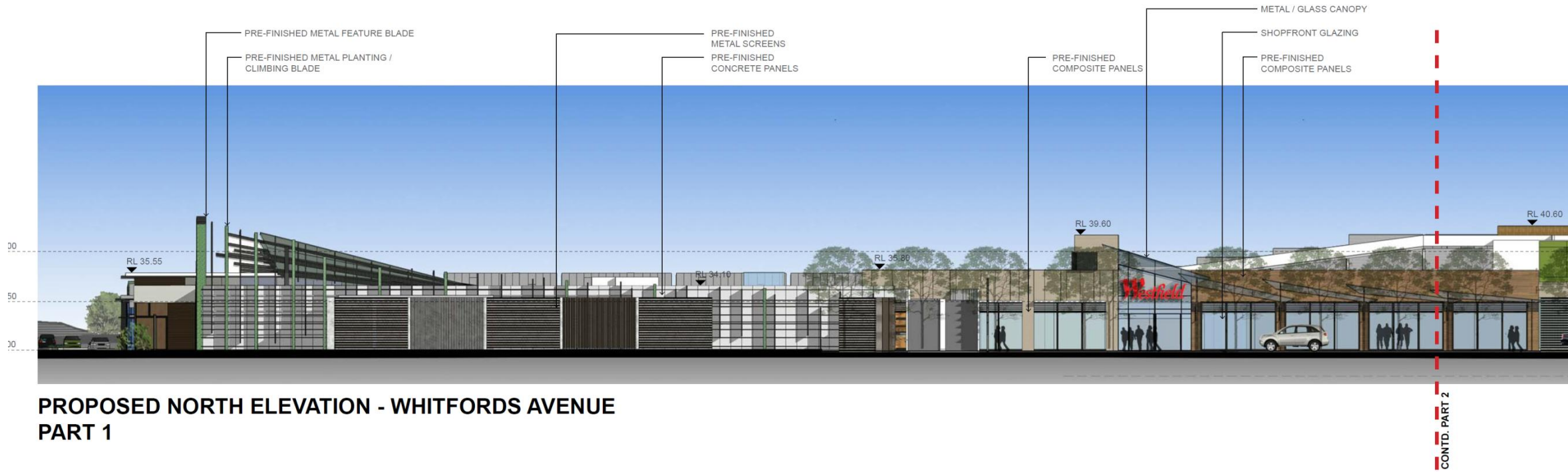
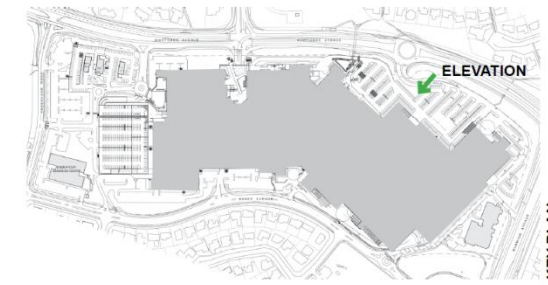
DEVELOPMENT APPLICATION

Notes:  
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Scale 1:200	Project No. 11310
	Date JULY 2013
Drawing no. DA-12	Revision A

Plan dated 30 August 2013



PROPOSED NORTH ELEVATION - WHITFORDS AVENUE  
PART 1



PROPOSED NORTH ELEVATION - WHITFORDS AVENUE  
PART 2

PROPOSED NORTH ELEVATION - WHITFORDS AVENUE  
WHITFORD CITY

DEVELOPMENT APPLICATION

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, RLs, survey and details.

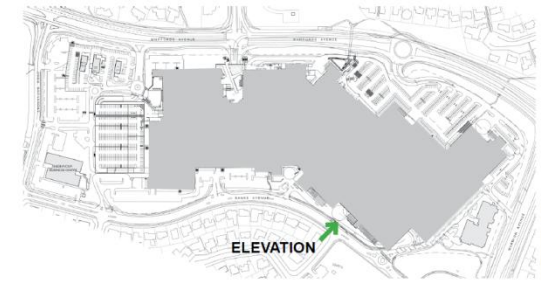
**Westfield**  
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**Westfield**  
RETAIL TRUST

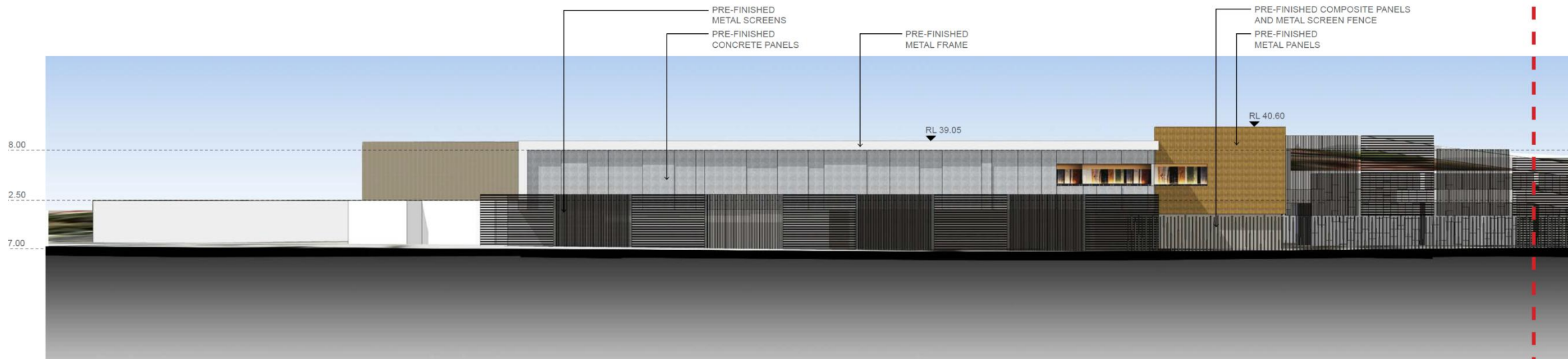
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	Date AUG 2013
Drawing no. DA-13	Revision B

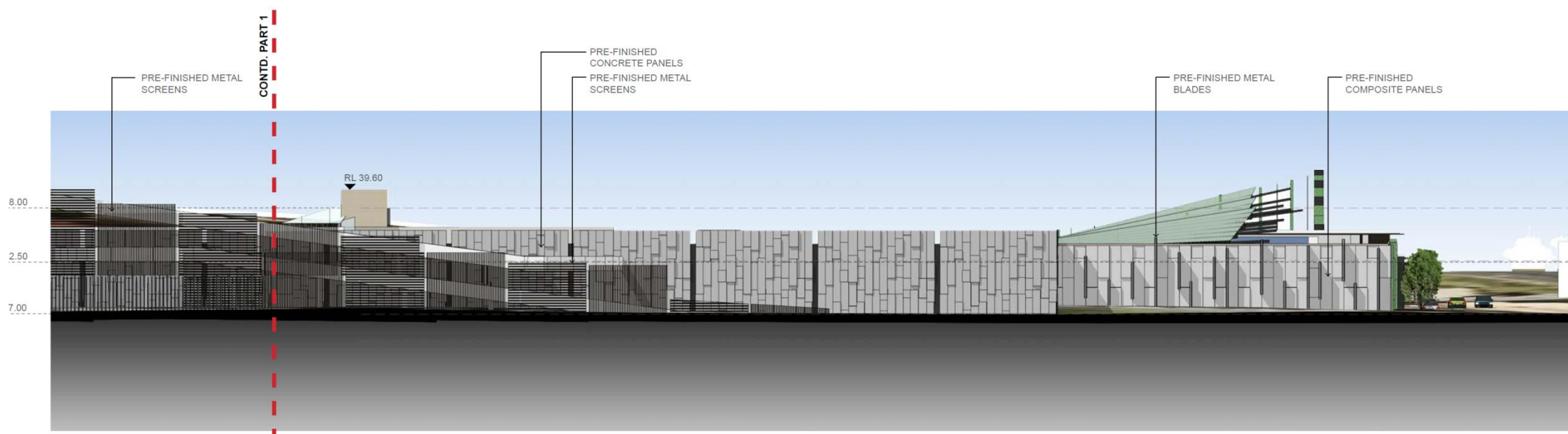
Plan dated 30 August 2013



KEY PLAN



PROPOSED SOUTH ELEVATION - BANK AVENUE  
PART 1



PROPOSED SOUTH ELEVATION - BANK AVENUE  
PART 2

PROPOSED SOUTH ELEVATION - BANK AVENUE  
WHITFORD CITY

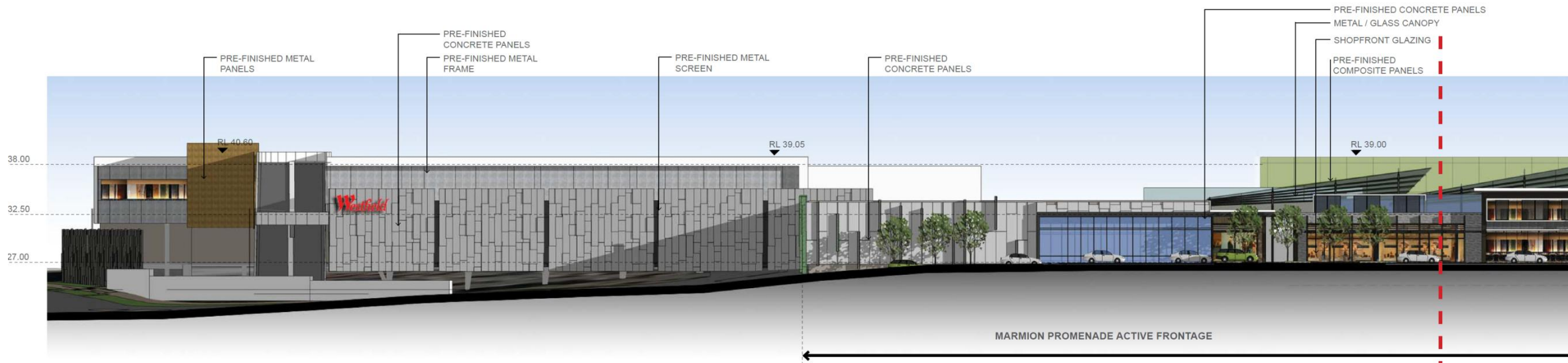
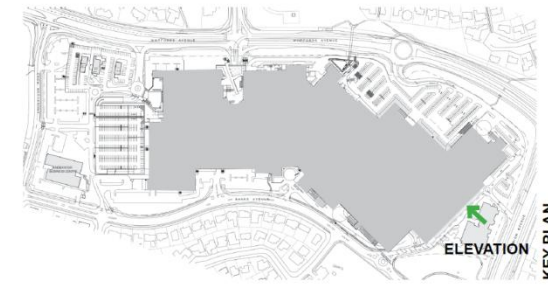
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\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details



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Drawing no. DA-14	Revision B

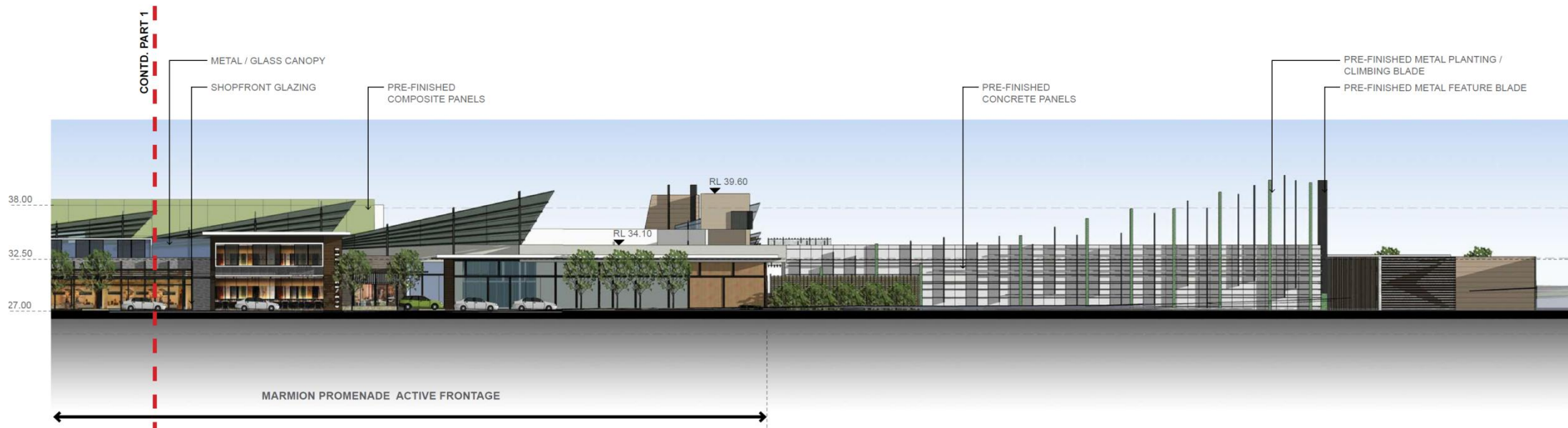
DEVELOPMENT APPLICATION

Plan dated 30 August 2013



PROPOSED EAST ELEVATION - MARMION AVENUE  
PART 1

MARMION PROMENADE ACTIVE FRONTAGE	
TOTAL FACADE AREA	1044 SQM
TOTAL GLAZING AREA	535 SQM : 51.25% (50% RECOMMENDED)
TOTAL FRONTAGE WIDTH	161 LINEAR M
TOTAL GLAZED FRONTAGE WIDTH	123 LINEAR M : 76.4% (75% RECOMMENDED)



PROPOSED EAST ELEVATION - MARMION AVENUE  
PART 2

PROPOSED EAST ELEVATION - MARMION AVENUE  
WHITFORD CITY

DEVELOPMENT APPLICATION

Notes:  
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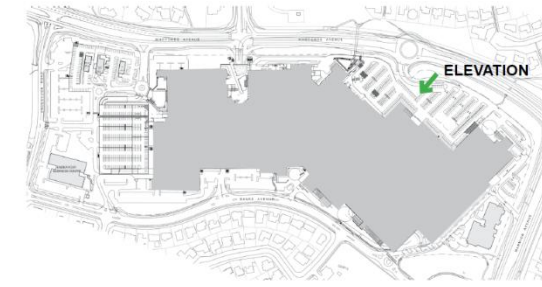
Westfield Design & Construction Pty Ltd



Scale 1:200	Project No. 11310
	Date AUG 2013
Drawing no. DA-15	Revision B



Plan dated 30 August 2013



PROPOSED NORTH ELEVATION - DETAIL

PROPOSED NORTH ELEVATION - DETAIL  
WHITFORD CITY

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details

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Westfield Design & Construction Pty Ltd

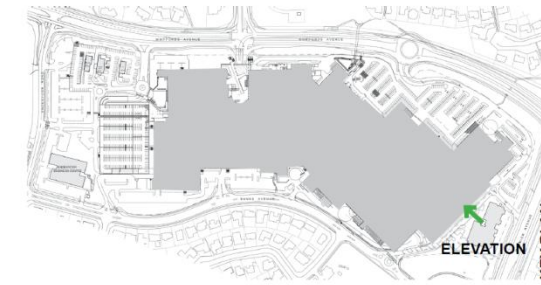
**Westfield**  
RETAIL TRUST

**GIC**

Scale 1:100	Project No. 11310
	Date AUG 2013
Drawing no. DA-16	Revision B

DEVELOPMENT APPLICATION

Plan dated 30 August 2013



**PROPOSED EAST ELEVATION - DETAIL**  
**WHITFORD CITY**

**PROPOSED EAST ELEVATION - DETAIL**

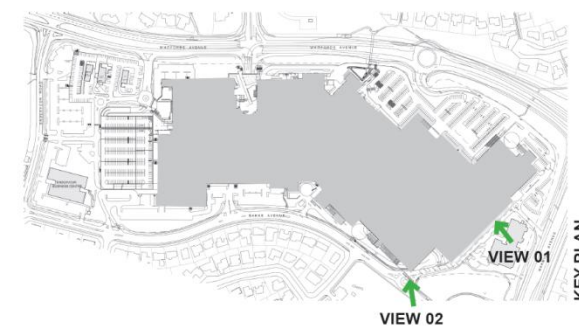
Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details



Scale 1:100	Project No. 11310
	Date AUG 2013
Drawing no. DA-17	Revision B

**DEVELOPMENT APPLICATION**

Plan dated 4 July 2013



VIEW 01



VIEW 02

ARTIST IMPRESSION

ARTIST IMPRESSION - NORTH-EAST / SOUTH  
**WHITFORD CITY**

DEVELOPMENT APPLICATION

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details

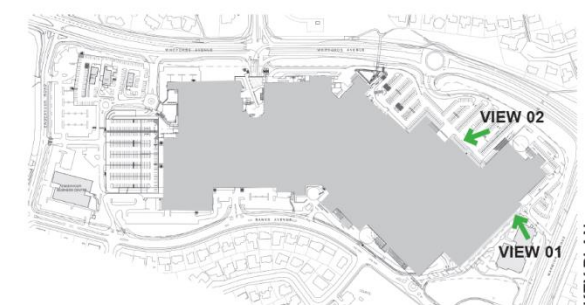


Westfield Design & Construction Pty Ltd



Scale	Project No.
NTS	11310
	Date
	JULY 2013
Drawing no.	Revision
DA-18	A

Plan dated 4 July 2013



VIEW 01



VIEW 02

ARTIST IMPRESSION

DEVELOPMENT APPLICATION

ARTIST IMPRESSION - NORTH  
**WHITFORD CITY**

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, R.L.S, survey and details

**Westfield**

Westfield Design & Construction Pty Ltd

**Westfield**  
RETAIL TRUST

**GIC**

Scale NTS	Project No. 11310
	Date JULY 2013
Drawing no. DA-19	Revision A

<b>THEME: TRAFFIC</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	Would consider giving consent, subject to traffic flow on Endeavour Road and Cook Avenue not increasing.
5	There are existing traffic problems.
1	The traffic congestion around the St Marks School/petrol station area is already high.
1	Banks Avenue is already busy, it is supposed to be an Avenue.
1	Traffic will intensify on Banks Avenue which will make it even more difficult to exit our driveway.
1	As a resident in Cumberland Drive, traffic flow and speed is a significant issue for residents in the area. Attempts by Council to address the issue by painting fake islands have been poor.
1	Traffic in Cook Avenue is already excessive as a result of the last major expansion to the shopping centre.
225	Endeavour, Green, Nash and Solander Roads are being used as “getaway slips” onto Cook Avenue endangering the lives of children and local residents.
225	People even now use other nearby smaller centres because of traffic and parking chaos.
1	It is very hard to enter Marmion Avenue from Cook Avenue due to traffic.
1	People ignore directional signs currently and drive onto the verge and break sprinklers. This will increase with the proposed development.
1	Thought needs to go into managing traffic in these areas.
2	There are insufficient traffic management measures in place to protect the amenity of streets.
19	Traffic will become much heavier as a result and no doubt the DAP will take this into consideration in its deliberations on this “exceptional circumstances” application.
1	Main concern is the right turn pocket from Marmion Avenue into Whitfords Avenue, which is already too short. It needs to be triple the length.
26	There will be too much traffic.
1	The size of the expansion will bring in hundreds of vehicles into the area that were never intended. The Council/government must make major changes to the feeder roads to and from the complex before or as part of the expansion and let residents know what will be done.
1	Obviously Whitford Avenue will have to go dual carriageway, therefore there would be massive increase in cars, noise, and pollution.
1	The application indicates an anticipated traffic increase of between 20 and 25%. There are currently major problems on Banks Avenue particularly with the round-a-bout going into the centre’s car park on the eastern side. These will be increased.

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1	There are new loading docks for the department store and discount department store planned on the Banks Avenue side. This will add additional traffic from large delivery trucks. As Banks Avenue is not a main road and has a limited width, this will only add to the congestion.
1	Hillarys will have to absorb more traffic, including more delivery trucks.
1	The expansion of the centre will lead to increased traffic congestion on the surrounding road network which will compromise the current access/egress to the school. The main traffic impacts will not be confined to the eastern end of the shopping centre. Of particular concern is the traffic impact as more people are drawn to the centre, loss of access from the early learning centre on Endeavour Road, loss of school parking and pick-up/drop-off areas and impacts on student safety.
1	Traffic using Endeavour Road has been steadily increasing and is now being upgraded with round-a-bouts because of the dangers. As more traffic is drawn to the centre with the retail expansion it is reasonable to assume that traffic will redistribute across the centre as the eastern end becomes more congested. Multi-purpose tips can also be expected to rise which will continue to be "car-borne". In this locality when parents are picking up and dropping off children the increased traffic congestion will be a safety concern.
1	The traffic improvements appear to only benefit the proposed development, and are cosmetic.
1	The submission documentation implies that the link road is to address existing congestion issues around the school. However, the requirement for the road is mostly generated by increased development around the school, including the centre expansion. The cost for such infrastructure should be covered fully by Westfield.
1	To address increasing traffic as a result of this development, a new northern access should be created for the school to use as an interim facility for drop-off/pick-up.
225	A previous decision by the Tribunal found that traffic problems in terms of the external impact were a significant consideration. The internal ring road at that time was not considered adequate.
1	Hillarys will have to absorb more traffic, more delivery trucks, 24/7 noise and congestion.
1	While the proposed development is at the east of the current centre, the significant increase in retail floor space, intensification of the activity centre and associated traffic impacts will adversely impact on the school.
1	Traffic impacts on the proposal would also impact on the drop-off/pick-up facilities on the road reserve on in Whitfords Avenue, which will severely impact on operations at the School pending the construction of the new link road. The most appropriate way to address this would be for a new northern access to be created for the school with an interim facility.

<b>THEME: PARKING</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
2	The additional parking is long overdue.
1	Is the parking area also planned for the eastern side of the shopping centre?
225	Westfield 'promotions' create parking chaos in all the adjoining streets of Hillarys and Kallaroo as well as Padbury and Craigie on the east side of Marmion Avenue. Banks Avenue traffic volumes are now at critical levels and should be kept for local residents only.
1	The parking calculations are misleading as it includes the activity centre as a given. If only 500 bays are being added, this is +13%, when the retail floorspace is expanding by 80%. Assuming that more people will walk or take public transport is a fantasy. Based on this there will be a need for an additional 3000 bays.
1	Rooftop parking on the second and third storey floors will not succeed due to public aversion of driving up to higher levels.

<b>THEME: BUILT FORM</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	There will be a loss of open areas.
1	It will be hideous to the area. Hillarys is a suburb, not an industrial estate.
1	The design is not attractive, and all views show a concrete block. Looking at the elevation north of Banks Avenue, who would want to live opposite such a building.
1	It is clear that this is a significant horizontal expansion.  Ideal choice would be to uplift the existing shopping centre and use the leftover space to build a village style place. I wouldn't mind a tower on top of the centre with offices, restaurants, apartments and a hotel.
2	The current shopping mall is ample.
1	The actual height and sizes mentioned seem too large for a suburban shopping complex.
1	The change of building height is far higher than originally proposed.
1	Oppose the building of a two storey department store adjacent to the footpath along Banks Avenue and to kerbside parking in Endeavour Road and Banks Avenue.
1	Oppose building three storeys along Endeavour Road, with no lawn, trees or other vegetation between the buildings and the footpath.
1	The proposed new heights and additional construction is too much for a seaside suburb.
225	The original plan for Whitford was for the centre to be as is. The scale of the application will impose its size of forty metre concrete panels and will spill luminous signage in all directions on the community.
1	Object to buildings through the complex greater than 2-3 storeys
1	The shopping centre currently does not attract that much attention due to its height. With the redevelopment this would dramatically change as well as the new frontages onto Marmion and Banks Avenue.
1	The proposal moves the main building closer to my property.
1	Object to landscaping promoting exotic species, especially deciduous trees. Suggest a landscape plan of a botanic gardens style across the complex that promotes WA species/swan coastal plain species with an educational/sustainable promotion.



<b>THEME: BUILT FORM</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	<p>The lifting of retail floor caps associated within the introduction of SPP4.2 was in recognition that a more comprehensive approach was needed to deliver activity centres rather than car-oriented “big box” shopping centres.</p> <p>The proposal is for a major expansion with a larger “box” and more car parking, without recognition of the planning objectives set out in SPP 4.2. It does not deliver a quality public realm as the main organising element of the centre. It leaves all these essential elements to “others” and to be addressed separately and retrospectively.</p>
225	<p>In regard to building and structure heights, the maximum height of structures indicated in DA-13 indicates the development will reach 40.5m and on the eastern side 41.6m. This compares with a maximum height of 27m in Endeavour District and 20m in the Retail District under the draft structure plan. What are the real facts? Westfield have to get their act together and be consistent in all figures and information given. How can residents possibly be expected to constructively comment on the content that is error ridden? What steps are now being taken by Westfield to correct these errors?</p>
1	<p>The impact of building bulk on the residents of Banks Avenue collectively warrants dismissal of the appeal.</p>

<b>THEME: LAND USE</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	It will be great for the Centre to have more shops, especially major retailers.
1	No objection to the inclusion of the new stores.
1	The expansion will give more variety and shopping options.
225	Small businesses will be squeezed out.
2	There are already too many shops at the shopping centre offering the same products.
1	Is in favour of David Jones as the area around Whitford City is more affluent and would add some attractive shops, but the location may be too close to Karrinyup.
1	There is already a separate Coles store in Hillarys.
2	Whitford Shopping Centre is boring selling shoes, clothes, IT and so little variety. There is a monopolisation of businesses, with little/zero promotion of Australian owned businesses.
1	If people want more shops they can visit other shopping centres close by.
1	Will the local gym and swimming centre be removed to make way for the extension?
1	How long will it be before the local library and senior citizens centre are removed?
1	The proposed plans can only enhance the local businesses, therefore customers will have more selections of stores and products.
1	Please include high density residential.
19	To many residents the most "unwanted" portion of the structure plan is the 673 apartments, and the overall integrity of the suburb must be retained. It cannot be allowed to be subverted by imposed edicts from the State or any other body.
19	Concerned that prior approval of this development would be the wedge to overcome objections to the structure plan. As previously mentioned residents are concerned about the lack of the State's bona fides in relation to the subject when the structure plan comes up for consideration.
1	The proposed number of dwellings is excessive and will cause traffic and noise.
1	Higher density is unsightly, crowded and out of character with single storey housing, coastal living will spoil the open character. Higher population will cause traffic, parking problems, design, scale will create disruption to already established businesses/shopping.

<b>THEME: RETAIL FLOORSPACE</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	In regard to the (retail) sustainability report it includes the activity centre which is not relevant as we do not know if the development of the entire activity centre is a reality.
1	Given the increase in the population which will mostly be in Wanneroo which is outside the Whitfords catchment, how can they expect the shopping centre to be profitable?
1	We also need to see that the regional shopping centres have or will have plans to increase retail space taking away from the potential of Whitfords City.
1	There are at least six shopping centres within a few kilometres of Whitford. Large shopping centre developments should be sited within the City of Joondalup. Juggernaut shopping centres do not belong in small coastal communities.
2	There are other shopping centres that already cater for the population.
1	Believe that the shopping centre more than adequately caters for the needs of surrounding residents given that there is also major development in Joondalup.
1	The original plan was for the centre to be the size that it is now.
1	The primary trading area consists of established suburbs which mean that there is no need to change the current retail offering. There are other major centres within the secondary or tertiary catchment which is expanding to include a department store etc.
1	The expansion of Whitford as a secondary centre to 81,451sqm has the potential to undermine the primacy of the Joondalup City Centre as the strategic metropolitan centre.  A review of the RSA provided with the development application identifies a number of inconsistencies that mean the proposed expansion will have a direct impact on the viability of other centres, and impact on the hierarchy of centres.
1	Other shopping centres will suffer.
225	The area is already well serviced. Development like this should be in the Joondalup City Centre.

<b>THEME: AMENITY</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	The development would greatly improve the visual amenity and pedestrian access of the centre.
234	General concern for the impact on the residential amenity that arises from development on this scale.
2	There is no mention of the impact the construction will have on shop owners, shoppers and residents which could last for years.
2	There will be continuous noise disturbance given the location of the loading bays.
7	The development will result in an increase in noise.
1	Increase in signage and illumination will impact on surrounding residents.
4	The development will increase litter in the area.
1	The local serenity, flora and fauna will be disturbed.
5	Concern for childrens safety given the location of school.
1	There will be an increase in anti-social behaviour.
2	Fear for loss in safety and security.
1	The shopping centre will severely alter the face of the suburb.
1	Seven day trading has already impacted on amenity, and an increase in size of the centre will only exacerbate these problems.
1	It will be detrimental to St Marks School and surrounding child care centres.

<b>THEME: EXCEPTIONAL CIRCUMSTANCES</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
3	Fears that should the application be supported under “exceptional circumstances” it will set a precedent and could override objections made to the structure plan.
19	Should approval be granted wording should ensure that it is clear to Westfield that this exceptional circumstance only applies to the shopping centre extension and related parking bays and loading areas, and shall not set a precedent or to modify or otherwise influence any decision that may be required regarding the consideration of the Structure Plan.
1	The draft structure plan is in the very early stage and only recently put to the community for comment, therefore limited weight can be given to the instrument as a ‘seriously entertained proposal’. The City also raised a number of concerns with the proposal in the March report to Council which further lends to the limited weight that can be given the structure plan in consideration of the proposal.
225	Refers to FAQ’s provided by the City which states that an activity centre structure plan is required to be endorsed before planning approval is granted, unless exceptional circumstances exist. This is tricky, and wonders whether the arguments put forward by Westfield in this regard qualify for permission for the development to proceed. The exceptional circumstances outlined by the applicant in their submission indicate that from Westfield’s point of view, approval of the structure plan is a foregone conclusion. Where does this come from? Are there possibly private arrangements between Westfield on the one hand and the State Government on the other in promoting and effectively having approved the whole scheme already?
1	The exceptional circumstance regarding the desire to attract a major retailer is in order to meet a commercial timeframe. This is a purely commercial matter, and is not considered to be a relevant planning consideration, nor a reason to circumvent due process. This reason also suggests that if the deadline to secure David Jones is not met that the centre will remain undeveloped. Given the significance of the assets it is unlikely that this would occur. If it is the intention that David Jones locate a store in the centre, it would be reasonable to assume that it would not walk away because of a small delay in timing. Also it is difficult to believe that David Jones will only locate in the centre under duress.
1	It seems to be a foregone conclusion that this development will go ahead. It is corporate bullying by suggesting exceptional circumstances existing is due to Westfield not being able to meet their previous commitment to potential future retailers. Surely good business planning and preparation would mean retail commitments are commenced after proposal approval.

<b>THEME: GENERAL SUPPORT FOR THE DEVELOPMENT</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
3	Any extension would be an improvement to the Whitfords area.
1	The expansion will be an advantage as it will increase property values and allow redevelopment of the property to allow a duplex.
3	Fully supportive of the upgrades.
2	The sooner the development and the new structure plan are approved and works commence the better.
1	Time for action and moving forward.
1	Great plan and idea for the area and for growth, and ever expanding/increasing population
1	The Joondalup Council would be crazy to object. The valuation of properties will increase, more Council revenue, greater demand for housing, increase values, everyone wins.
3	Progress.
1	Hopes for little disruption.
2	Looking forward to the extension.
1	There has been no real development at Whitfords Shopping Centre and it is imperative that we expand an important shopping centre. For too long the centre has been left behind as Joondalup has developed.
1	More high density development is required to support the surrounding population.
1	Supports the development being concentrated on the eastern side of the centre.
1	Will create new job opportunities.
1	Supports the development subject to noise impacts being minimised and height not exceeding three storeys.
4	Supports the development so long as it does not include residential apartments.

<b>THEME: SPP 4.2</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	A more comprehensive approach needs to be undertaken to ensure a cohesive and integrated approach to the activity centre. The structure plan as required by SPP 4.2 is the appropriate mechanism for this.
1	<p>Considering that SPP4.2 encourages diversification and intensification of land uses within activity centre, the development application should not be supported as it only proposes retail expansion.</p> <p>Should the development application be supported it would facilitate short term retail expansion only without any mechanism to require the development of other land uses. Each stage of the development should incorporate a mix of land uses to ensure an integrated, cohesive and diverse activity centre is established.</p>

<b>THEME: CONFORMANCE TO DPS2</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	<ul style="list-style-type: none"> <li>• The proposed DA is for a significant retail expansion which is not warranted based on independent reviews of the RSA provided as part of the application.</li> <li>• The DA has been prepared in accordance with a flawed structure plan, and therefore does not present an appropriate planning framework for the development to be considered.</li> <li>• The DA is not consistent with orderly and proper planning as it have been prepared in accordance with a flawed structure plan which is not considered a seriously entertained planning proposal.</li> <li>• SPP4.2 requires a structure plan to be endorsed prior to major development, unless exceptional circumstances existed. It is considered that no such provisions exist.</li> </ul>
1	It is also noted that the development does not satisfy all the development requirements for the 'Commercial' zone of DPS2, including car parking and landscaping and therefore should not be supported.

<b>THEME: OTHER</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
1	<p>Many people overlook that Westfield intends carrying out extensions to the buildings on its own property. It has an inalienable right to do so, within reason, and provided it complies with legislation and related regulations.</p> <p>No doubt the DAP will be examining the application along such lines as to take into account Westfield's right as mentioned above but having regard to problems that may or are expected to arise there from in relation to the surrounding locality.</p>
1	Prepared two documents for surrounding land owners to sign. Found that 81% of respondents were neutral to the development, and 19% objection. Some residents also did not want to make a submission.
1	To combat urban sprawl areas around shopping centres and railway stations need to be rezoned to higher density living.
7	Does not see a valid reason for the additions to the Whitfords area other than sheer greed on behalf of the owners and Joondalup Council, plus a state government wanting to cram as many people into as small an area as possible.
1	The only condition to which they grant approval is the liberalisation of the West Australian State retail legislation, in order to remove shopping hour restrictions for both retailers and shoppers and to allow free trade in WA suburbs and rural country.
1	Does not see a benefit to the community.
1	Real estate values will suffer.
1	We should be reducing the need for big shopping centres by decreasing population.
1	Sick of residents being hassled by continual attacks from proposed development on the shopping centre site.
1	Do not want the shopping centre boundary to increase and encroach into any current housing areas.
1	Do not want the sanctuary of housing areas between Monkhouse Way and Banks Avenue to be affected or rezoned.
1	Westfield constantly bullies and does whatever it wants.
2	The Centre has already expanded too much.
1	This is purely to benefit Whitford, with no benefit to Hillarys residents.
1	Expansion of the shopping centre to make it more attractive to shoppers is smoke and mirrors put out as the



<b>THEME: OTHER</b>	
<b>TALLY OF SUBMISSIONS RECEIVED IN RELATION TO COMMENT</b>	<b>SUMMARY</b>
	long standing family genre of the suburb is swamped by greed and then ultimately by future high rise slum development ringing it.
1	I just hope the powers to be, elected members who represent the Joondalup municipality strongly oppose the development.
1	It is a money grabbing venture that puts money into the corporate pockets. Surely this company could spend their money elsewhere.
1	Has been a resident of Hillarys for 15 years, one of the reasons she bought into the area was it was an established suburb and close the beach. It is a residential area with no or very limited areas of expansion for further residential housing.
225	Westfield state that they have been committed to the consultative process leading up to this lodgement of the application, including engagement with the City, WAPC, other government departments, key stakeholders and the community. Westfield has not extensively engaged with the community. The giving of general presentations by Westfield in noisy food forums and the like is not consultation by any stretch of the imagination. This demonstrates that Westfield have not been upfront an honest with affected parties and does not come "clean" on all aspects of a development. It only reflects self interest and ignores the many negative aspects that their actions have on residents in adjacent areas not only now but in the future as it relates directly to the overall development of the centre.
225	The question now arises whether both our Local Municipality and particularly our State Government will support the local community or side with corporate/commercial muscle.  Please place neighbourhood need above corporate greed. The love of money is the root of all evil.
1	Have already commented on the proposed development which included 673 dwellings and the population growth associated with it that would bring increased crime and traffic. There is no mention of dwellings in the proposed development. Would prefer to comment on the proposed development in its entirety.
2	This is the start of the previous planned extensions of the Whitford Shopping Centre.
1	Also concerned about the type of apartments proposed and the potential increase in crime due to higher density housing. Does not want Hillarys to have the same reputation for crime as Scarborough.

AGENCY	SUBMISSION SUMMARY
Department of Transport	<p>Notes that major issues regarding the development application would pertain mostly to operational issues by the Public Transport Authority and Main Roads WA.</p> <p>It is understood that both the Public Transport Authority and Main Roads WA will be providing separate comments.</p>
Public Transport Authority	<p>Bus stop boarding areas for all stops surrounding the shopping centre are not to be modified without involvement from the PTA. No capacity must be lost for existing embayment, nor new ones added without consultation with the PTA.</p> <p>Route 441 will continue to operate along Endeavour Road and bus stop locations along the new “main street” must be sited in full consultation with the PTA. We expect to maintain the Endeavour Road set of bus stops in/around their present location and remain on-street. Service frequency is anticipated to be 10 min peak, 30 min interpeak both to Whitfords Station and Warwick Stations.</p> <p>Route 442 will remain on its present alignment and the PTA has no plans to reroute the service along Banks Avenue. Consideration to amend a service along Banks Avenue would only be considered if/when Banks avenue exhibits more active frontage and density levels significantly increase on the southern side of the road. Previously patronage levels along Banks Avenue did not justify the retention of bus services.</p> <p>Access upgrade to bus stops and increase in the prominence of these stops surrounding the centre is welcomed.</p> <p>The PTA would welcome discussion to include the provision of digital signage within the centre advising shoppers of next available buses. Over time it is anticipated this could include real time passenger information.</p>

<p>Main Roads WA</p>	<p>The inclusion of the left turn lane (Marmion Promenade) is not supported. MRWA preferred option is that existing slip lanes turning into Banks Avenue and Whitfords Avenue are lengthened to allow for greater volumes of traffic turning west. Any modification to Banks Avenue is required to be supported by the City.</p> <p>The background growth rate used (10%) is deemed to be suitable for the DA to full build out and 2025. However, the 17.5% background growth rate should be used for the Structure Plan for the year 2031. This will be subject to further discussions between the applicant and MRWA.</p> <p>The modifications to the Marmion/Whitfords Avenue and Marmion/Banks Avenue intersections are supported in principle, subject to works being undertaken by the developer.</p> <p>Further upgrades to the Marmion/Whitfords Avenue intersections are recommended as part of this development application, including double right turn lanes from the south and west.</p> <p>Notes comments regarding modifications to the cycle times that can enable better performance at these intersections. These require approval from MRWA and proposed modifications shall be sent to MRWA for advice and comment before any approval is sought.</p> <p>Notes that there is a discrepancy between the car parking provided as part of the DA and requirement of the SP. MRWA does not support a car parking amount higher than the cap under the structure plan. Supports the inclusions of the Parking Management Plan, which should be developed in consultation with MRWA.</p> <p>The inclusion of a cycle path along Marmion Avenue is generally supported. This is subject to further consultation with MRWA and commitment for the developer to fund the works.</p>
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Water Corporation	<p>The area has been infrastructure planned for the previous land planned density, and some of the water and wastewater infrastructure may not be adequate to serve the proposed redevelopment.</p> <p>While the area is relatively well served with headwork which may require some upgrading, it is likely that upgrading of the reticulation works would also be required. Reticulation works are to be funded by the developer, and the Water Corporation may also require land to be ceded free of cost for works.</p> <p>Existing services into the site may need to be amplified, or added to. Details of this are to be resolved at the Building Application stage.</p> <p>Consideration should be given to water efficiency measures, and achieve targets set in <i>Water Forever 2010</i>. New development should exceed this target in order to ensure that the metropolitan target is met.</p> <p>A water management plan should be provided as part of the development application demonstrating how water efficiencies can be met. Subject to this, the Water Corporation will schedule headworks if the timing requirement is within the next five years.</p> <p>Further water management plans and engineering documentation should be provided by the application to the Water Corporation prior to building application stage.</p>
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<p>Department of Planning</p>	<p>The development site is currently serviced by three existing vehicular access points from Whitfords Avenue and no changes are proposed.</p>
<p>Land Use and Coordination</p>	<p>The assessment has assumed that a left-in access will be provided from Marmion Avenue. Marmion Avenue is a Category 1 Primary Regional Road which is planned and managed by Main Roads. It is unlikely that Main Roads will approve an access point from this road.</p> <p>The approach to the traffic generation for the shopping centre expansion appears to have followed the prescribed methodology but the traffic generation does not appear to be completely consistent with the level of magnitude proposed by the development. The shopping centre expansion proposes an approximate increase of 60% in NLA, and 42% increase in GLA, while the traffic generation shows a 20-25% increase. It is acknowledged that the traffic generation growth will not represent a linear growth rate but will decline as the shopping centre increases in size.</p> <p>Despite the 42% increase in GLA and a lower growth rate due to the size of the centre, it is our view that the traffic generation maybe stated lower than it should be. Therefore it is recommended that the traffic generation should be checked and verified with Main Roads WA.</p> <p>The method used for trip generation is acceptable.</p> <p>The assessment has analysed a number of intersections managed either by Main Roads WA or the City of Joondalup. It is suggested, that due to the lower levels of traffic generation assumed in this assessment that all analysis of intersections are reviewed and analysed to the satisfaction of Main Roads WA and the City of Joondalup.</p> <p>There are no objections to the proposed improvements planned for Whitfords Avenue.</p> <p>Marmion Avenue is planned to be upgraded in the future from four to six lanes. The assessment does not appear to have taken this upgrade into consideration. The improvement/upgrade proposed by this assessment will need to account for the six lanes at the intersection.</p> <p>The development should contribute to a contribution scheme for the cost of the Marmion Avenue/Whitfords Avenue upgrade.</p>

The areas highlighted in bold in the following table indicates areas where it is considered that the development does not meet the policy requirements.

General requirements for Secondary Centres			
	Characteristic	Applicant comments	City comments
Main role/function	<i>Secondary centres share similar characteristics with strategic metropolitan centres but serve smaller catchments and offer a more limited range of services, facilities and employment opportunities. They perform an important role in the city's economy, and provide essential services to their catchments</i>	The enhanced and expanded Westfield Whitford City will result in an increased array of commercial services for nearby residents, and complement the existing office, community, bulky goods and education uses within the wider activity centre	The proposed development is considered to meet the main role/function of a secondary centre.
Transport connectivity and accessibility	<i>Important focus for passenger rail and/or high frequency bus network</i>	The provision of public transport services is the responsibility of the State Government, however it is anticipated that the increased size of the centre will provide the opportunity for increased patronage, and in turn, justification for increased services. Note that the Public Transport Authority have provided in principle support to the public transport framework established under the draft WACSP.  Pedestrian paths are provided to bus stops on Marmion Avenue and Whitford Avenue from the expanded centre.	Currently the centre is serviced by six bus routes, providing links to Whitford, Warwick and/or Joondalup train stations. Three of these routes have a peak frequency of 15 minutes, with off peak frequencies being between 30 to 60 minutes.  The details set out in the draft WACSP refer to the introduction of a Bus Rapid Transport hub being provided at the Whitford Activity Centre. However, there is no commitment to when such a service would be provided, and it is identified as not being provided before 2031.
Typical retail types	<ul style="list-style-type: none"> <li>• Department stores</li> <li>• Discount department stores</li> </ul>	<ul style="list-style-type: none"> <li>• Supermarkets</li> <li>• Specialty shops</li> </ul>	The development will facilitate a new department store, an upgraded supermarket and discount department stores, as well as new and enhance speciality stores
Typical office development	<ul style="list-style-type: none"> <li>• Major offices</li> <li>• Professional and service businesses</li> </ul>	There is no office space as part of this proposal; however existing offices will remain within the Westfield site, including the Endeavour Business Centre and along Banks Avenue.  Expansion of commercial land uses is accommodated through the draft WACSP	No office component is proposed as part of this development.
Future indicative service population	<b>Up to 150,000 persons</b>	<b>The main trade area for the activity centre includes suburbs such as Hillarys, Craigie, Mullaloo, Kallaroo, Padbury, Ocean Reef, Beldon, Woodvale, Greenwood, Sorrento, and other parts of the North-West Region. The population within the trade area is currently in the order of 145,000.</b>  <b>The Retail Sustainability Assessment indicates that this will increase to 149,600 by 2016, 152,800 by 2021 and 158,090 by 2031.</b>	<b>An independent review of the Retail Sustainability Assessment for the City noted that the trade area identified is not adequately justified.</b>  <b>The analysis provided by the applicant indicates that by 2021 the service population will exceed 150,000 persons which is more than the indicative service population for a secondary centre.</b>  <b>As discussed above, if the trade area was to be reduced, the service population would also reduce and may then fall within acceptable limits.</b>
Walkable catchment for residential density target	<i>400 metres</i>	The centre is surrounded by several decades old low density suburban housing.	No information has been provided to demonstrate the 400 metre walkable catchment. The City estimates that the walkable catchment currently consists of 910 dwellings, in an area of approximately 100 gross hectares.
Residential density per gross hectare	<b>Minimum – 25 dwellings per gross hectare</b> <b>Desirable – 35 dwellings per gross hectare</b>	<b>No residential development is proposed as part of this development.</b> <b>To remedy the low density suburban housing, the draft WACSP provides for approximately 739 dwellings within the structure plan area. Additionally, the City's draft Local Housing Strategy identifies a Housing Opportunity Area surrounding Westfield Whitford City, with a maximum total dwelling yield of over 5,688 dwellings.</b>	<b>Based on the City's estimate of the 100 gross hectares within the 400 metre walkable catchment, a minimum of 2,500 dwellings and a desirable 3,500 dwellings should be provided.</b>  <b>This is discussed further in the Model Centre Framework assessment below.</b>

General requirements for Secondary Centres			
	Characteristic	Applicant comments	City comments
Diversity performance target	Secondary centres shop-retail above 50,000m <sup>2</sup> but below 100,000m <sup>2</sup> – 40%	<p>The activity centre currently provides for 49,990m<sup>2</sup> of shop-retail floor space, out of an estimated 77,000m<sup>2</sup> total floor space, resulting in a diversity target of 35.2%.</p> <p>Assuming that all additional floor space proposed will be shop-retail, this will result in 81,451m<sup>2</sup> of shop-retail, out of an activity centre total of 110,769sqm, resulting in a new diversity performance of 26.46%.</p> <p>In the real-life scenario where 22% of all specialty store floor space will be for non-shop-retail uses, the total floor space will be 74,818m<sup>2</sup>, resulting in a new diversity performance of 32.4%.</p> <p>The Whitford Activity Centre will also continue to offer the Whitford Library and Whitford Senior Citizen Centre, community services on Endeavour Road, the St Mark's School, and non-shop-retail and services along Endeavour Road, offering a diversity of land uses.</p> <p>Under the draft WACSP the land uses diversity that will ultimately be achieved will be 42% by 2031.</p>	<p>With the development of the additional retail floor space the diversity target will reduce to 26.46%, which is the equivalent of a land use diversity target for an activity centre with a shop-retail floor space of between 10,000m<sup>2</sup> and 20,000m<sup>2</sup>. It is also noted that the majority of expansions under Stages 1, 1A and 2 will be commercial based, which if this includes shop-retail floor space would further reduce the land-use diversity.</p> <p>While the applicant has demonstrated that future development will incorporate residential and other land use components that would increase the land use diversity, there is no requirement within the current planning framework (including the draft WACSP) for the centre for this to be undertaken. Therefore approval could be given for the expansion, and there would be no requirement for the land use diversity to be improved through the provision of other developments.</p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Centre Context	<i>Document and map the centre's regional context, recording the centre's strengths, weaknesses and opportunities</i>	<p>The centres regional context has been considered in this report, and the draft WACSP discusses:</p> <ul style="list-style-type: none"> <li>• Locality and role in the region</li> <li>• Land ownership and road hierarchy</li> <li>• Existing land uses, including employment and diversity.</li> <li>• The existing and proposed planning framework</li> <li>• Site condition, including servicing, soils, landform and microclimate</li> <li>• Urban structure and character</li> <li>• Existing public spaces</li> <li>• Existing legibility and sense of place</li> <li>• Public transport</li> <li>• Vehicle movement and access</li> </ul> <p>The proposed development has been conceived following the production of the draft structure plan, which has thoroughly analysed the centres context.</p>	While the City does not believe the draft Structure Plan to be a 'seriously entertained planning proposal', and therefore should not be used as the sole basis for addressing component of the Framework, it is considered that appropriate detail has been given to support this requirement.
	<i>Document and map transport links and accessibility nodes within the centre boundary and its surrounds. Note local street hierarchy, bus services and stops, rail facilities, and pedestrian/cycle access and provisions</i>	<p>The application sets out the location of the development in relation to its immediate context and surrounding built form.</p> <p>The transport assessment provides:</p> <ul style="list-style-type: none"> <li>• An aerial photograph showing the location of the site and the surrounding network of Primary Regional Road and Other Regional Road</li> <li>• A map of key roads immediately surrounding the centre and their classification</li> <li>• A plan and data indicating the existing bus routes, bus stop locations, and information about frequency of stops. Bus routes connections to Joondalup/Clarkson rail line are also indicated.</li> </ul> <p>An access and movement plan demonstrates the pedestrian movement to, around, and through the centre, as well as bus and cycle routes.</p>	It is considered that an appropriate level of detail has been given to support this component.
	<i>Review relevant state and local planning policy, guidance, and best practice noting key objectives and targets relation to the centre.</i>	<p><b>The application sets out consideration and compliance with relevant state and local planning framework. This includes state and local planning strategies and policies.</b></p> <p>In summary, the applicant states that the State planning context, in particular SPP 4.2 supports the scale of the proposed centre, as do a wide range of strategic State and local documents which outline the need for additional commercial floor space in the north-west sub-region to address major self-sufficiency gaps.</p>	<p>While it is considered that appropriate consideration has been given to the state and local planning framework, the following comments are made:</p> <ul style="list-style-type: none"> <li>• A key component of SPP 4.2 is the development of activity centres which increase the range of employment, density and diversity of housing, and provide a land-use mix to support public transport. By this development being focused on retail expansion only, and reducing the land use diversity it does not address these aspects. While it is acknowledged that a draft WACSP has been prepared in the applicant's opinion in accordance with SPP 4.2, this is not considered by the City as a 'seriously entertained planning proposal'. Furthermore, this structure plan does not mandate development land use mix and residential targets to ensure that the objectives of SPP 4.2 are achieved.</li> <li>• The City's draft Local Commercial Strategy recommends a shop-retail floor space for Whitfords of 50,000m<sup>2</sup> before a Retail Sustainability Assessment would be required by the City to justify the additional shop-retail NLA. This document was reviewed following public consultation, and is yet to be presented to Council for further consideration. However, based on an independent review of the RSA for this development, it is considered that a maximum shop-retail of 65,000m<sup>2</sup> to 75,000m<sup>2</sup> could be considered before the development could impact on the retail hierarchy and other commercial centres.</li> </ul>



Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Movement	<p><i>Identify gaps and deficiencies in the strategic transport network affecting the provision, efficiency and choice of access to the centre</i></p>	<p>A transport assessment has been undertaken for the development. Overall it concludes that the proximity of higher order roads including Whitfords Avenue and Marmion Avenue allows for efficient access to and from the Centre without impacting adjacent residential areas. The location of these roads and the high quality access from the Centre implies that the majority of traffic demand will be accommodated within the regional road network and will minimise further local traffic issues.</p> <p>The transport report has undertaken an analysis of the existing traffic situation which has been used partly in predicting further traffic demand, as well as demonstrating the impact of the proposed development and improvements required.</p> <p><u>Public transport</u> The transport assessment sets out that currently the bus services provided around the centre serve commuters from residential developments in local suburbs rather than for recreational use. Therefore the focus is on wide coverage, using residential streets rather than direct routes, adding time to journeys and being somewhat inconvenient for those not using trains as part of their journey.</p> <p>Because of this the services are unlikely to provide significant opportunities to address the transport needs of shopping centre customers and staff.</p> <p>While a framework to influence changes to behaviour and increase use of public transport is provided as part of the draft WACSP, this development application seeks to provide improved connectivity between Whitford City and surrounding bus stops, and improve facilities at these bus stops. Furthermore, investigations and discussions with the PTA will be undertaken to provide real time travel information.</p>	<p>It is considered that the applicant has adequately demonstrated an analysis of the gaps and deficiencies that influence choice of travel to the centre.</p> <p>The steps to improve visibility and convenience of access to public transport stops are considered appropriate, however it is unknown if this will result in any noticeable shift in staff or customer behaviour.</p>
	<p><i>Audit the pedestrian and cycle facilities within the centre boundary noting gaps, deficiencies and hindrances in the service and infrastructure provision. Define clear initiatives to address the shortfall in pedestrian and cycle facilities, define cycle parking and end of trip facilities for broad classes of development, and promote sustainable journeys by providing for pedestrian, cycle and bus interchange at high frequency transport hubs</i></p>	<p><b>The transport assessment identifies deficiencies in the cycle and pedestrian network. This includes:</b></p> <ul style="list-style-type: none"> <li>• Lack of tactile paving at all pedestrian crossing points at both shopping centre driveways and external intersections.</li> <li>• Absence of grab rails for cyclists at the majority of shared path crossing points.</li> <li>• Pedestrian underpasses are viewed as undesirable crossing treatments.</li> <li>• No cycle lanes are currently provided on Banks Avenue.</li> <li>• Existing crossing points at some driveways are poor.</li> </ul> <p>Mitigation strategies are also given to address these, being:</p> <ul style="list-style-type: none"> <li>• Tactile paving to be installed at all pedestrian crossing points</li> <li>• Grab rails to be installed on the left-hand side of each crossing point, facing the direction of travel</li> <li>• For Whitfords Avenue, installing bollards to prevent trolley access to underpass, and provide signalisation with the shopping centre to increase pedestrian use</li> <li>• For Banks Avenue, paint cycle lanes of 1.5 metres (1.2 metres minimum) within the existing five metre wide lanes. Also reconfigure splitter islands to provide appropriately sized landing area to allow pedestrians to cross shopping centre driveways in a safe manner.</li> </ul>	<p>In accordance with SPP 4.2 the responsible authority is required to ensure that safe and convenient access for pedestrians and cyclist, including people with a disability.</p> <p>The City has raised concern with the applicant as to how safe the internal access for cyclists to the end of journey facilities is, given that the routes indicated require cyclists to traverse across primary vehicular access points, in front of service docks and car parking areas where there is potential for a multitude of vehicle movements occurring (particularly vehicle access the upper deck car park from the ramp on the eastern side of the proposed supermarket). While they have mentioned providing dedicated cycle lanes the connection from the access road to the car park is unclear.</p> <p>In response to these concerns, the applicant has stated that <i>heavy vehicles will not be in high volume, particularly not during normal trading hours and the proposal currently does not breach any scheme or policy requirements. The indicative cycle routes between external cycle paths have been shown, and we are confident cyclist that use on-road cycle lanes to reach Whitford City will have no difficulty traversing a relatively low speed car park.</i></p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Movement		<p>It also outlines long term active transport improvement, however these are not within the scope of this development application.</p> <p>Internal pedestrian/cycle movements are also proposed to be improved around the extension, including:</p> <ul style="list-style-type: none"> <li>• An on-road cycle land at the entrances from Whitfords Avenue and Marmion Promenade to the end of trip facilities</li> <li>• Upgrade of the internal footpath to provide a better connection to the bus stops on Marmion Avenue.</li> </ul> <p>Attachment 9 of this report demonstrates the movement and access plan and location of upgrades.</p> <p><u>Provision of Bicycle Parking and End of Trip Facilities</u> The transport assessment sets out that in line with best practice it is recommended that separate areas are provided for employee and customer bicycle parking. Employee bicycle parking should be more secure than customer parking, located in secure cages at various locations or in a central facility. Customer parking should be provided at key entrances where possible and may be limited to simple bicycle racks, located preferably in covered areas with a high degree of passive surveillance.</p> <p>Staff bicycle parking will be incorporated in an overall Parking Management Plan (PMP) for the Shopping Centre and include provision for bicycle parking based on the Green Building Council of Australia's Green Star building accreditation system as follows:</p> <ul style="list-style-type: none"> <li>• One point where staff bicycle spaces are provided based on 5% of staff</li> <li>• One point where one space per 1,250m<sup>2</sup> GLA for customers at centres over 85,000m<sup>2</sup></li> </ul> <p>In relation to end of trip facilities the transport report recommends one locker for each staff bicycle space, and shower facilities in a central facility or various locations.</p> <p>It is proposed that 130 bicycle parking bays be provided across the site. This consists of:</p> <ul style="list-style-type: none"> <li>• 55 bays for customers provided in the form of bike racks which are in sheltered positions at main entrances to the centre</li> <li>• 75 bays for staff provided in a new central end of journey facility at the north eastern entrance to the centre (adjacent the proposed supermarket).</li> </ul> <p>The end of journey facilities provided with the staff cycle bays also includes 75 personal lockers, five male and five female showers.</p>	<p>This matter was also raised by traffic consultant who undertook an independent review of the transport report for the City. They stated that while the location of end of trip facilities for cyclists near a major entrance is in accordance with Green Star Building Accreditation, the facilities are not easily accessible by cyclists which is also required to achieve the rating. In order to reach these from the external network, cyclists would be required to travel through the car park (safety issue) or travel along the cafe strip on the northern side of the building. In specific response to this, the applicant stated that they are confident cyclists that currently use on-road cycle lanes will have no difficulty traversing a relatively low speed car park. It is noted that an at-grade crossing is provided along Whitfords Avenue, between Marmion Avenue and the Shopping Centre Roundabout; this continues into the site, providing a route from external shared paths and leaving only a short distance to cover within the customer car park. Way finding signage will also be provided as part of the Car Park Management Plan. The City maintains concerns about the ease of access to these facilities, which could act as a disincentive in encouraging a shift from private vehicles to this mode of transport.</p> <p>It is noted that the expansion will create an additional 1,500 jobs, taking the total employment for the shopping centre to 2,939. Furthermore, the total GLA for the shopping centre will be approximately 84,695m<sup>2</sup> (detail provided in the transport report). Based on the information from the applicant on the green star building accreditation system:</p> <ul style="list-style-type: none"> <li>• 147 staff bicycle spaces should be provided (5% of 2,939)</li> <li>• 68 bicycle spaces for customers, should also be provided.</li> </ul> <p>Being a total of 215 bicycle spaces.</p> <p>In regard to end of trip facilities, the above provision of staff facilities would require 147 bicycle lockers. No detail is provided on how the number of shower facilities has been calculated, however it is noted the amount proposed is approximately 13% of the total number of staff bicycle spaces. Applying this percentage to the 147 bicycle spaces, this would require approximately 20 showers, being 10 male and 10 female.</p> <p>Under SPP 4.2 it is recommended that 5-10% of bays be provided as motorcycle and bicycle parking. Based on 4,317 spaces being provided across the site, this would require between 216 and 431 bays.</p> <p>It is therefore considered that there could be an undersupply of bicycle and end of trip facilities to motivate a change in staff and customer behaviour.</p> <p>In addition to the accessibility of the end of trip facilities being of concern, the location of the end of trip facilities is also proposed in an area of limited passive surveillance at all hours. The location of the facilities, whilst adjacent an active frontage to the north, is located under a car park access ramp.</p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Movement	<p><b>Conduct a transport assessment of the local street network to identify where capacity, stress/surplus occurs. Use the findings and contextual data to:</b></p> <p><b>(i) Design streets to meet the required level of use and access (including priority access where appropriate) and form a well-connected and legible network that includes safe and efficient pedestrian routes to public transport hubs.</b></p> <p><b>(ii) Inform traffic management proposals such as vehicle speed and access restraint, reduced severance/noise/pollution, and increased safety.</b></p> <p><b>(iii) Locate access to major development sites that avoids detriment to road capacity and safety.</b></p> <p><b>(iv) Identify suitable routes for delivery and service access.</b></p>	<p>A transport assessment was submitted as part of the application in an effort to address this requirement. This is discussed in Attachment 10.</p>	<p>An independent review of the transport report was undertaken as part of the City's assessment. A summary of the matters raised as part of this review is provided in Attachment 10, including the applicant's response.</p>
	<p><b>Locate heavy freight generating uses such as distribution and warehousing away from congested central areas and preferably near the strategic road network</b></p>	<p>The development proposes four loading docks, being:</p> <ul style="list-style-type: none"> <li>• Loading docks for the department store and discount department store on the southern side of the expansion, accessed via Banks Avenue</li> <li>• Loading docks for the super market and mini majors on the northern side of the expansion, accessed via Whitfords Avenue.</li> </ul> <p>The applicant has stated that the loading bays are a reality of retailing and shopping centres. All new loading areas are located away from mall entrances and on the periphery of the centre. The transport report also states the reconfiguration of car parks surrounding the redevelopment building will require routes to existing service yards to be assessed for safety and accessibility. Westfield will accept as a condition of planning consent the need to demonstrate that all service vehicles can enter and exit the subject site in forward gear.</p> <p>Further information was subsequently provided demonstrating the ability for service vehicles to manoeuvre (to leave in forward gear).</p>	<p>The loading docks are considered to be located away from congested central areas of the centres. While the access to the loading docks from Whitfords Avenue will also utilise a primary vehicular access point for customers, it is considered that the infrequency of service vehicles arriving during peak customer trading hours would result in minimal conflict.</p> <p>The location of the service docks on the southern side are not accessed from the higher order roads of Marmion and Whitfords Avenue. Furthermore, the access to these docks is directly opposite residential properties on the southern side of Banks Avenue.</p> <p>The City has not had time to review the swept path diagrams that demonstrate the ability for service vehicles to manoeuvre within the loading docks so as to leave the site in forward gear.</p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
	<p><i>Undertake an audit of the existing parking supply occupancy rates and patterns of use, and use the findings to identify opportunities for more efficient use</i></p>	<p>A parking survey was undertaken to determine the current car parking utilisation. This survey was undertaken for the following dates and times:</p> <ul style="list-style-type: none"> <li>• Thurs 13 December 2012 (10am – 7pm)</li> <li>• Sat 15 December 2012 (10am – 2pm)</li> </ul> <p>The peak utilisation for Thursday 13 December was between 11.30am and 12.30pm and was 89% utilisation. The peak utilisation for Saturday 15 December was experienced between 11.30am and 12.30pm and was 98%. Therefore the peak parking demand experienced was 3,319 spaces and 3,673 spaces on Thursday and Saturday respectively.</p> <p>The survey also identified a number of vehicles parked in undesignated areas resulting in the number of cars shown as parked in certain areas being higher than the number of bays available.</p> <p>Current car parking management strategies to deal with peak car parking demand periods are in place. These strategies include ensuring that staff park on the upper most car park deck, patrolling the car park to ensure that staff is not utilising customer parking areas, and informal parking on Whitfords Avenue road reserve.</p> <p>It is recognised in the transport assessment that some of these current strategies are not reasonable and future management measures should be implemented to improve awareness of where car parking may be available, ensuring staff park in the most inconvenient areas, enforcing time limits, and park pricing after a certain time period.</p>	<p>A parking management plan specific to this development has not been included as part of the application. Rather broad principles such as those above are set out, which the applicant considers will transform the existing car parks from the business-as-usual approach currently employed towards a managed car park that is economical whilst also performing efficiently from a traffic engineering perspective. It has been requested by the applicant that a condition of development approval require a parking management plan.</p> <p>While it is not questioned that a parking management plan will assist in ensuring efficient use of parking, it is considered that the strategy cannot be required to be developed after the determination of the development application.</p> <p>The parking management plan should demonstrate that the proposed parking supply will be adequate, and set out the measures adopted to ensure efficiency. The City does not have any comfort, therefore, that the amount, location of the car parking as proposed is appropriate or workable.</p>
Activity	<p><i>Record the existing uses and document any gaps in the land use mix. Identify the requirements to address the diversity performance target</i></p>	<p>The submission sets out that “Westfield Whitford City forms the primary retail destination within the activity centre and the proposal will diversify the retail offering available, and support other non-retail uses, including future surrounding residential intensification within and outside of the structure plan area.</p> <p>The future diversification of the activity centre will take place when the Endeavour and Banks districts are developed.”</p> <p>In regard to land uses, this development is only to provide an additional 31,461m<sup>2</sup> of retail floor space. A staging plan is provided as part of the submission which sets out:</p> <ul style="list-style-type: none"> <li>• Stage 1 is the current development application.</li> <li>• Stage 1A is the development of Marmion Promenade to support Stage 1.</li> <li>• Stage 2 will include further development of the shopping centre site, including commercial development on Banks Avenue to sleeve the existing centre (subject to a LDP), and refurbishment of the remainder of the existing shopping centre.</li> <li>• Stage 3A is development of the eastern side of Endeavour Road being a major residential mixed use development progressively from 2017 (subject to LDP).</li> <li>• Stage 3B is the development of the western side of Endeavour Road, north of St Mark’s and is also a major residential/mixed use redevelopment progressively from 2020.</li> </ul> <p>The remainder of the structure plan area is indicated as being development by others, with no timeframes provided.</p>	<p>The proposed development is for shop-retail floor space only, lowering the land use diversity mix to 26.46%. While this staging plan has been provided, it is unclear how this will result in an increase in the land use mix. Furthermore, there is no impetus to actually proceed with any of the development set out in the staging plan.</p> <p>It is considered a mix of land uses should be incorporated within this development, and not be focused solely on retail development.</p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Activity	<i>Where required by the activity centres policy, conduct a retail sustainability assessment or retail needs assessment</i>	<p>A retail sustainability assessment has been submitted as part of the application. The impact modelling undertaken for the RSA indicates that:</p> <ul style="list-style-type: none"> <li>• The development of Whitford Activity centre to provide 90,000m<sup>2</sup> of shop-retail floorspace by 2016 is appropriate in scale and can be supported by the market without affecting the development potential of other centres in the hierarchy.</li> <li>• The assessed level of impact on any one centre is manageable and the proposed expansion would not adversely impact the role, function and viability of other activity centres. Market growth is expected to off-set the one-off impacts and each affected centre is expected to achieve a higher turnover in 2016 than 2012 following the proposed expansion of Whitfords.</li> <li>• A significant share of the impacts will be the result of a redirection of retail expenditure away from centres outside the Joondalup municipality. More expenditure undertaken locally will provide greater support for other uses, serve as a catalyst for other investment in centres and generally support the development of larger, vibrant and successful activity centre.</li> <li>• The trading impact of the Whitford expansion is manageable. Furthermore, the main street of Joondalup will not be affected as this area mainly caters to the convenience and services needs of a local town centre residents, workers, students and visitors. The city centre of Joondalup will still have a substantially larger provision of shop-retail floorspace (i.e. 120,000m<sup>2</sup> with the expansion of Lakeside Shopping Centre).</li> <li>• Joondalup remains the retail core and is the focus for commercial, civic, cultural, employment and services in the north-west sub-region of Perth.</li> </ul>	<p>To assist the City in its assessment of the RSA, an independent consultant was appointed. They concluded that based on the information and analysis by the applicant that the supportable shop-retail floor space would be between 65,000 – 75,000m<sup>2</sup>, after which time there is the potential risk that there would be an impact on other retail centres.</p> <p>The development proposes to increase the shop-retail NLA by 31,461m<sup>2</sup> to 81,451m<sup>2</sup>. Therefore it is considered that the proposal is not appropriate.</p>
	<i>Maximise pedestrian benefit by locating new retail along accessible streets and areas that can support high foot fall</i>	Outward facing tenancies are proposed on the new portion to Whitford Avenue. An interactive pedestrian retail environment is also proposed on Marmion Promenade.	It is noted that the development is set back from external streets, and therefore the creation of 'streets' have been created to suit the design of the shopping centre. It is noted that the majority of the external development of the shopping centre does not present active facades, with the exception of Marmion Promenade and Whitfords Avenue. However, due to the internal nature of the shopping centre these would not currently have high pedestrian footfall. The proposed development does not seek to change this significantly.
	<i>Identify employment sectors (retail and non-retail) and formats (i.e. live-work) and estimate the number and types of jobs provided by the centre</i>	The applicant has stated that it is estimated that this development will create an additional 1,500 jobs (predominately retail), taking the total within the Centre to 2,939, as well as up to 2000 jobs during construction.	It is noted that with the exception of the temporary construction jobs, that the type of employment will remain retail focused.

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Activity	<i>Assess the housing densities required within the walkable catchment to meet the residential density targets in the Policy</i>	The applicant has not provided any information on housing densities and considers this requirement as not applicable as no residential development is proposed as part of this development. Rather they considered that the draft structure plan and the City's draft Local Housing Strategy will facilitate significant residential intensification in the future.	<p>While no detail has been provided by the applicant as part of the development application, the City has estimated that there is approximately 100 gross hectares within the 400 metre walkable catchment for the centre. For secondary centres, the minimum residential density target is 25 dwellings per gross hectare and 35 dwellings as the desirable amount. This means that between 2,500 to 3,500 dwellings should be provided within the walkable catchment.</p> <p>It is estimated that there are 910 dwellings currently within the walkable catchment, being 35 within the activity centre structure plan area and 875 outside the structure plan area.</p> <p>The applicant states that there are 739 dwellings that will be constructed within the overall activity centre structure plan area, however it is noted that the current version of the draft WACSP identifies 673 dwellings. This figure is indicative only, and there is no impetus for these to be constructed.</p> <p>Therefore in order to meet the minimum target of 2,500 dwellings an additional 886 dwellings would be required outside the activity centre structure plan area.</p> <p>It is noted that the draft Local Housing Strategy will contribute to providing the opportunity for increased densities within the catchment. It is estimated that with these lots developing to their maximum dwelling yield, an additional 1,020 dwellings could be developed. This would give a maximum of 2,634 dwellings within the walkable catchment.</p> <p>However, this would be reliant on every residential lot within the walkable catchment being developed by 2031 which is unlikely to be the case. The Department of Planning's Outer Metropolitan Perth and Peel Sub-Regional Strategy assumes a take-up rate of infill development of 85%, and applying this a maximum of 2,350 dwellings would be provided within the walkable catchment by 2031.</p> <p>Therefore it is likely that the residential development that could occur by 2031 would fall short of meeting the minimum dwelling target. Furthermore, given the extent of retail floorspace proposed it is considered that the residential component for the activity centre should achieve closer to the desirable amount of 3,500 dwellings.</p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Urban Form	<i>Define design controls that allocate maximum (and minimum) building heights and setbacks to safeguard an attractive and appropriate scale to streets and public spaces, and solar access</i>	The draft Whitford Activity Centre Structure Plan provides controls relating to building height, street setbacks, landscaping, landmarks, façade articulation, levels of activations etc. This proposal has been assessed against those and is compliant.	<p>A development application cannot define design controls, however the development proposed should be assessed to ensure that the height and scale safeguard an attractive and appropriate scale to street and public spaces, and solar access.</p> <p>SPP 4.2 encourages an urban form that is based on small, walkable blocks, with buildings that address the street with a mix of uses, with large scale retail and large areas of car parking sleeved by active building frontages with fewer blank walls. The policy acknowledges that traditional shopping centres struggle to deliver sufficient street-based activity, and hybrids only manage where the enclosed mall is a small portion of the total centre. The opportunity to sleeve large scale retail or introduce outward facing uses to avoid blank wall is encouraged. Building fronts should also offer weather protection.</p> <p>The development extends the shopping centre further to the east, closer to Banks and Whitfords Avenue on the south and north respectively, and the City's community facilities and Marmion Avenue to the east. Active frontages are proposed for a portion of Marmion Avenue (directly opposite the community facilities) and a portion of Whitfords Avenue, where key building entrances are located. However, blank facades are proposed along Banks Avenue, the centre as viewed from the corner of Marmion and Banks Avenue, and corner of Marmion and Whitfords Avenue. While a high degree of articulation is proposed, the facades do not encourage street activation.</p> <p>The building entrances and active frontages are set back from the street boundaries, with car parking positioned in front and blank articulated façade and service docks set closer to the external road network. While the development is considered to improve on the existing built form and level of activation, it is considered that the development will still largely maintain the form of a typical suburban shopping centre 'box'.</p>
	<i>Define design controls to optimise building densities within the centre boundary, subject to other built form and environmental objectives</i>	The proposed major increase in shop-retail is occurring within the structure plan boundary and on a site that has a long history of being a major retail centre in the north west sub-region. Lower-scale, more intimate shop-retail uses will occur in Banks Avenue and Endeavour Road, before land uses transition generally to residential only outside of the centre boundary. These are subject to future applications.	<p>A built form density of one to two storeys is proposed. This is typical of a shopping centre, and consistent with the existing built form scale.</p> <p>It is acknowledged that at present the development on the southern side of Banks Avenue (opposite the centre) is low density residential development, and therefore built form densities need to be sympathetic to this. The overshadowing diagram submitted with the application (Attachment 3) indicates that the maximum extent of overshadowing will extend to properties on the southern side of Banks Avenue.</p> <p>Future development of this area in accordance with an activity centre structure plan and higher densities proposed under the draft Local Housing Strategy that the built form character on the southern side of Banks Avenue will change in time.</p>

Model Centre Framework Requirements			
Element	Requirements	Proposed	City Comment
Urban Form	<i>Define land use and design controls that provide for active uses (e.g. retail, service, hospitality) at ground floor and maximise building articulation, including the use of glazing and entrances to animate spaces and minimise blank facades/inactivity</i>	<p>The draft WACSP includes a 'Street Interface' plan which outlines which frontages within the centre are to be Active, Passive or Attractive.</p> <p>Active frontages have been identified and provided in areas such as Marmion Promenade, while large scale retail element façade are generally proposed to be vibrant and attractive to minimise the visual impact and bulk of the centre and activate the street.</p>	<p>As stated above, active frontages have been provided to Marmion Promenade and a portion of Whitfords Avenue where building entrances are located.</p> <p>While the blanks facades are proposed to be articulated it is considered that the articulation provided in some areas lacks a level that provides interest at the pedestrian scale. This includes the deck car park, metal screens and frames along Banks Avenue to screen car park ramps and loading areas and screens around the loading dock on the northern side of the extension. It is acknowledged that some landscaping will be provided to assist this.</p> <p>It is also noted that pedestrian movement around the external of the expansion is limited, particularly when moving from the eastern entrance (Marmion Promenade) to the northern entrances facing Whitford Avenue. While it is acknowledged that for convenience most visitors would manoeuvre through the shopping centre, by such opportunities not being provided, it further internalises the development limiting external activation, and moves against the principles of SPP 4.2.</p>
	<i>Provide weather protection using awnings, eaves, or street trees</i>	Shelter will be provided along Marmion Promenade, and within 20 metres of major building entrances. Trees provided within car parks and Marmion Promenade.	The proposed weather protection ensures that adequate levels of shelter are provided where pedestrian activity will be highest. However, pedestrian shelter outside of these areas is limited, which can act to discourage and limit external pedestrian movements around less active areas of the shopping centre. It is noted that these areas currently don't have clear pedestrian paths indicated.
	<i>Provide a landscape strategy that provides for biodiversity and urban ecologies and protects against adverse microclimatic effects</i>	Landscaping concepts have been prepared. Shading in the car park area will be provided, as well as landscape element upon arrival to the centre and the centre entrances.	The landscaping concept plans are provided in Attachment 12. This identifies different scales of landscaping based on its purpose, including defining entrances points, providing shelter within car parks, and acting as screening.
Resource Conservation	<i>Establish guidelines for new development to ensure that energy-saving design and technology is incorporated through passive solar building orientation and roof designs that facilitate use of photovoltaic panels, natural ventilation and wind turbines</i>	<p>ESD checklist and ESD report submitted. The development is being designed to exceed minimum requirements in terms of ESD, and is aiming to achieve the equivalent of the following green building ratings:</p> <ul style="list-style-type: none"> <li>• 4 star green star – retail (v1)</li> <li>• 3.5 star NABERS energy retail rating</li> </ul>	The ESD report has been provided in Attachment 11. This includes a summary of the coding and rating systems, including the predicted performance of the centre against the green star rating.
	<i>Mandate the use of waterwise plants and trees in all centre landscape plans</i>	Landscaping concepts provided.	The landscaping strategy does not specifically mandate waterwise plants, however the plants identified are considered to be waterwise. Mandating of waterwise plants could be achieved through a condition of an approval.
	<i>Establish targets for stormwater and greywater use</i>	Measures have been outlined to reduce water demand in the design, construction and operational phases in the ESD report.	Attachment 11 indicate water reduction strategies, however these appear to only be possible strategies that could be employed. The summary of the green star rating system indicates that rainwater will be used for landscaping irrigation and cooling towers. The applicant has indicated that grey-water reuse systems will form part of the development, however it is unclear where these will be used. Furthermore, there does not appear to be any information provided on a water target that the development will meet.



The areas highlighted in bold in the following table indicates areas where it is considered that the development does not meet the Scheme requirements.

Assessment against development Requirements for the 'Commercial' zone under DPS2				
Requirement	Proposed			City Comment
Land uses:  Shop 'P' use Department Store 'D' use	'Shop' and 'Department Store'.			Land uses appropriate in the Commercial zone
Building Setbacks 4.7.1 Unless otherwise provided for in Part 3 of the Scheme, buildings shall be set back from property boundaries as follows:  Setback from the street boundary: 9.0 metres Setback from side boundary: 3.0 metres Setback from rear boundary: 6.0 metres  4.7.2 Where a lot has a boundary with more than one street the Council shall designate one such street as the frontage and the other street boundaries as side boundaries, if it is satisfied that there will be no adverse effect on traffic safety, and no adverse effect on the amenity of any adjoining properties or the locality generally.		Required	Provided	Complies
	Street Boundary (Whitfords Ave)	9 metres	30 metres	Yes
	<b>Street Boundary (Banks Ave)</b>	<b>9 metres*</b>	<b>7 metre min</b>	<b>No</b>
	Street Boundary (Marmion Ave)	3 metres	27 metres	Yes
	Street Boundary (Endeavour Rd)	3 metres	>400 metres	Yes
	Side Boundary (to internal road/COJ site)	3 metres	6 metres	Yes
4.8 Car parking standards  4.8.1 The design of off-street parking areas including parking for disabled shall be in accordance with Australian Standards AS 2890.1 or AS 2890.2 as amended from time to time. Car parking areas shall be constructed and maintained to the satisfaction of the Council.  4.8.2 The number of on-site car parking bays to be provided for specified development shall be in accordance with Table 2. Where development is not specified in Table 2 the Council shall determine the parking standard. The Council may also determine that a general car parking standard shall apply irrespective of the development proposed in cases where it considers this to be appropriate.  In accordance with Table 2 the car parking requirement for shopping centre is:  <b>3,000 bays for the first 50,000m<sup>2</sup> NLA plus 4.8 per 100m<sup>2</sup> NLA thereafter.</b>	Car parking will be provided in accordance with Australian Standards.  A total of 4,317 bays are provided across the site, which the applicant states is equivalent to 4.88 spaces per 100m <sup>2</sup>			
	It is noted that a range of land uses exist across the site, including freestanding drive through food outlets, and a two storey business centre ('Offices'). The City requested confirmation from the applicant on the total NLA for all development based on individual land uses. They considered that it would be more appropriate for one standard to apply across the site. As such all land uses have been calculated using the shopping centre standard.  While a NLA figure has been provided for the shop-retail component of the development on-site, NLAs for other uses have not been provided and cannot be calculated based on the development plans provided. As such, car parking has been calculated on the GLA figure for the site provided in the transport assessment, being 89,698m <sup>2</sup> .  The car parking requirement based on this is 4,906 bays.  It is noted that as part of the Omnibus Amendment to DPS2 (which is currently with the Department of Planning for consideration), it is proposed that the shopping centre standard will be changed to:  2,400 bays for the first 50,000m <sup>2</sup> NLA and 4 per 100m <sup>2</sup> NLA thereafter.  Applying the omnibus standard 3,988 bays would be required.			

Assessment against development Requirements for the 'Commercial' zone under DPS2																																							
Requirement	Proposed		City Comment																																				
<p><b>4.9 Pedestrian and vehicle reciprocal access requirements</b></p> <p><i>If the Council approves car parking and pedestrian access on neighbouring premises in a manner which relies on the reciprocal movement of vehicles and pedestrians between or across the premises, the owners concerned shall allow the necessary reciprocal access and parking at all times to the Council's satisfaction.</i></p>	An easement exists between Westfield and the City to ensure right of access over the access point from Banks Avenue. This is not proposed to be changed as part of this application		The existing easement is not impacted by the development. The development does not generate the requirement for any further parking or access easements.																																				
<p><b>4.10 Traffic entrances</b></p> <p><i>The Council may where it considers it desirable and in the interests of traffic safety direct the owner of any lot to limit access and egress or provide such additional access and egress as it requires to any premises.</i></p>	An additional entrance is proposed from Marmion Avenue (Marmion Promenade). This is proposed to be left in only.		An analysis of the access points was undertaken as part of the traffic assessment for the development. This component of the development was reviewed by independent consultants for the City. Attachment 10 provides a summary of their feedback and issues.																																				
<p><b>4.12 Landscaping requirements for non-residential buildings</b></p> <p>4.12.1 <i>A minimum of 8% of the area of a development site shall be designed, developed and maintained as landscaping to a standard satisfactory to the Council. In addition the road verge adjacent to the lot shall be landscaped and maintained in a clean and tidy condition to the satisfaction of the Council.</i></p> <p>4.12.2 <i>When a proposed development includes a car parking area abutting a street, an area no less than 3 metres wide within the lot along all street boundaries shall be designed, developed and maintained as landscaping to a standard satisfactory to the Council. This landscaped area shall be included in the minimum 8% of the area of the total development site referred to in the previous subclause.</i></p> <p>4.12.3 <i>Landscaping shall be carried out on all those areas of a development site which are not approved for buildings, accessways, storage purposes or car parking with the exception that shade trees shall be planted and maintained by the owners in car parking areas at the rate of one tree for every four (4) car parking bays, to the Council's satisfaction.</i></p>	<table border="1"> <thead> <tr> <th></th> <th>Required</th> <th>Provided</th> <th>Complies</th> </tr> </thead> <tbody> <tr> <td><b>Site area landscaped</b></td> <td><b>Min 8%</b></td> <td><b>6.87%*</b></td> <td><b>No</b></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="4">Landscaping strip adjacent car parking areas:</th> </tr> <tr> <th></th> <th>Required</th> <th>Provided</th> <th>Complies</th> </tr> </thead> <tbody> <tr> <td><b>(Whitfords Ave)</b></td> <td><b>3 metres</b></td> <td><b>Nil min.</b></td> <td><b>No</b></td> </tr> <tr> <td>(Banks Ave)</td> <td>3 metres</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>(Marmion Ave)</td> <td>3 metres</td> <td>3 metres min.</td> <td>Yes</td> </tr> <tr> <td>(Endeavour Rd)</td> <td colspan="2">Not proposed to change as a result of this development.</td> <td>N/A</td> </tr> <tr> <td><b>Shade Trees</b></td> <td><b>1:4 car bays</b></td> <td><b>Where provided, trees are generally at a rate of one per six bays or less.</b></td> <td><b>No</b></td> </tr> </tbody> </table>			Required	Provided	Complies	<b>Site area landscaped</b>	<b>Min 8%</b>	<b>6.87%*</b>	<b>No</b>	Landscaping strip adjacent car parking areas:					Required	Provided	Complies	<b>(Whitfords Ave)</b>	<b>3 metres</b>	<b>Nil min.</b>	<b>No</b>	(Banks Ave)	3 metres	N/A	N/A	(Marmion Ave)	3 metres	3 metres min.	Yes	(Endeavour Rd)	Not proposed to change as a result of this development.		N/A	<b>Shade Trees</b>	<b>1:4 car bays</b>	<b>Where provided, trees are generally at a rate of one per six bays or less.</b>	<b>No</b>	<p>The percentage of landscaping has been based on information from the applicant (the City has not been able to accurately calculate soft landscaping based on the development plans provided). The applicant has indicated that there is currently 15,250sqm of soft landscaping that will reduced to 13,596sqm as a result of this development.</p> <p>It is noted that the applicant has advised that there is 13.46% soft landscaping on-site. However, this has been calculated as a percentage of the open space provided on-site, not the total site area as required.</p>
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<p><b>4.14 Storage and rubbish accumulation</b></p> <p>4.14.1 <i>All storage, including the storage of accumulated rubbish, shall be confined to within a building, or a suitably enclosed area screened from its immediate surrounds and any adjacent public street or road by normal viewing by a wall not less than 1.8 metres in height constructed of brick, masonry or other approved material. All storage of accumulated rubbish shall be located in a position accessible to rubbish collection vehicles and where vehicular access and car parking will not be adversely affected.</i></p> <p>4.14.2 <i>Development requirements for enclosed storage areas and garbage storage areas relating to residential developments for grouped and multiple dwellings are contained within the 'Residential Design Codes'.</i></p>	Refuse disposal areas to be located within proposed loading docks. These will be screened from view by landscaped metal screens exceeding the 1.8 metre height requirement.		The development is considered to meet this requirement.																																				

The areas highlighted in bold in the following table indicates areas where it is considered that the development does not meet the structure plan requirements.

Assessment against the draft Whitford Activity Centre Structure Plan		
General Development Requirements		
Requirements	Proposed	City comment
<p><u>Land use</u> Land use in accordance with the land use permissibility table.</p> <p>Where not listed in the structure plan, but listed in DPS2 the land use is considered to be a use not permitted.</p>	<p>The land use 'Shop' is a permitted use in the Retail District.</p> <p>The land use 'Department Store' is not listed</p>	<p>While the land use 'Department Store' is not listed, it is acknowledged that this was removed to align with the Omnibus Amendment to DPS2. Under this amendment 'Department Store' is proposed to be deleted, as it considered to fall within the category of 'Shop'.</p>
<p><u>Commercial Floor Space</u> The shop-retail floor space contemplated is 95,000m<sup>2</sup> NLA and 69,000m<sup>2</sup> NLA non-retail commercial floor space</p>	<p>The addition of 31,461m<sup>2</sup> will increase the shop-retail NLA to 81,451m<sup>2</sup>.</p>	<p>While the development meets this requirement, concerns have been raised as part of the City's assessment of the structure plan about the amount of shop-retail proposed and impact on the retail hierarchy and viability of other centres.</p>
<p><u>Residential Density</u> R-AC 0</p>	<p>No residential development proposed</p>	<p>It is noted that under the structure plan the majority of residential development is indicated to occur on the western side of the shopping centre site and western side of Endeavour Road.</p>
<p><u>Building Height</u> Building Height shall be a maximum of 20 metres</p> <p><b>Ground floor to floor heights are to be 4.5 metres</b></p> <p>Buildings built to nominated minimum street setbacks to be no more than 13.5 metres high for the first six metres of the building depth.</p>	<p>Maximum Building Height (as measured from natural ground level) 16.1 metres</p> <p><b>The new services areas are less than 4.5 metres in height. This has been acknowledged by the applicant.</b></p> <p>Building to Marmion Promenade maximum of seven metres.</p> <p>The building at the mid-point of Marmion Promenade offers an architectural point of interest through a landmark glass roof to the centre, with a variety of angled metal and glass canopies. The roof provides both a practical and architectural purpose.</p>	<p><b>Noted that the ground floor to (next) floor heights requirement does not exclude service areas. Therefore the development does not meet this requirement.</b></p>
<p><u>Street Interface</u></p> <p>Retail district street frontage to Marmion Promenade to be 'active'.</p> <p>Requires pedestrian shelter (2.5 metres width, 2.75 metre clearance).</p> <p><b>50% or more of façade to be glazed including 75% of the width at ground floor, sills to be no more than 500mm above ground level</b></p>	<p>Application states that this has been provided.</p> <p><b>Applicant has calculated that the glazing on the Marmion Promenade facades occupies 51.25% of the area, and 76.4% of the width of the frontage.</b></p>	<p>The development plans do not clearly indicate the location and clearance of awnings for the Marmion Promenade frontage.</p> <p><b>The frontage that the applicant has used to calculate the glazing includes some internal facing malls set further into the site, and not directly fronting Marmion Promenade. The City considers only those portions of the frontage facing Marmion Promenade should be used in the calculations. On this basis, the glazing occupies approximately 52% of the area, and 62% of the width. Therefore the requirement has not been met. It is noted that the 'active' frontage includes approximately 26.4 metres of a blank façade.</b></p>

Assessment against the draft Whitford Activity Centre Structure Plan		
General Development Requirements		
Requirements	Proposed	City comment
<p><u>Pedestrian access</u></p> <p>Shopping malls Internal pedestrian shopping malls are to be connected to external street, to contribute to an integrated urban form</p> <p>Car parks In large areas of car parking (deck or at grade), clearly signed and safe pedestrian access routes are to be provided that lead to building entrances.</p>	<p>Two new eastern mall exits open out onto what will be Marmion Promenade. These will link to Banks Avenue and Marmion Avenue also indicated in Attachment 3.</p> <p><b>A remodelled access to the north of the centre (adjacent the new supermarket) is also proposed.</b></p> <p><b>Access directly to the shopping centre is also provided for all car parking levels</b></p>	<p>The new eastern malls are considered to adequately link to Marmion Avenue and Banks Avenue via pedestrian paths.</p> <p><b>This mall is indicated as exiting into the car park, with no linkage indicated to the external network. It is noted that the development does not provide an external link from this exit around to the eastern side of the centre.</b></p> <p>The new and remodelled at-grade parking on the northern and eastern side of the centre shows limited crossings.</p> <p>No pedestrian crossings are shown for the basement car park, this includes not being able to exit onto Marmion Promenade. There is approximately a maximum of 100 metres from the furthest car bay to the shopping centre entrance.</p> <p>Pedestrian crossings are indicated on Roof Level 1.</p> <p>No pedestrian crossings are indicated on Roof Level 2. There is approximately 60 metres from the furthest car bay to the nearest shopping centre entrance.</p>
<p><u>Vehicle Parking and Access</u></p> <p><b>Parking provision</b> Ultimate car parking bay car of 4,200 bays applies to the Retail District. Parking rate of 4.5 spaces for 100sqm for all uses in the retail district has been applied to determine this cap.</p> <p>Car parking for people with a disability to be provided in accordance with Australian Standards.</p> <p>Sleeving of parking At grade and deck car parking areas are to be screened and to be visually attractive from the public realm.</p>	<p>The applicant has advised that their proposal entails an additional 568 bays on site bringing the total to 4,317. This includes existing parking located within the Endeavour District and Banks District. Therefore 3,706 bays are located within the Retail District portion of the site.</p> <p>The provision is not clear on whether the 4.5:100m<sup>2</sup> relates to NLA or GLA. It has been assumed that this refers to GLA. Based on a GLA of 87,145m<sup>2</sup> for development within the Retail District (being the amount provided in the transport assessment) the car parking ratio is 4.25 bays per 100m<sup>2</sup>.</p> <p>The applicant has stated that this will be provided.</p> <p><b>Applicant's submission states that the new basement parking area is screened by the level difference and the proposed screens that hide the ramps between levels.</b></p> <p><b>New/modified at grade parking fronting Whitfords Avenue, and Marmion Avenue (near the intersection) is not screened.</b> Upper level decked car park is screened sufficiently and will not be visible from the public realm at this point in time.</p>	<p>The 3,706 bays to be provided within the Retail District, would support a maximum of 82,356m<sup>2</sup> GLA within the district.</p> <p>It is noted that the applicant has stated that the shop-retail NLA will be a total of 81,451m<sup>2</sup>, however this would not include other non shop-retail land uses. A total NLA figure for the shopping centre has not been provided by the applicant. Including the cinemas, which are approximately 3,000m<sup>2</sup> in area the car parking ratio would still be less than 4.5 bays per 100m<sup>2</sup>.</p> <p>It is therefore considered that the development does not meet this requirement.</p> <p><b>The artists impressions indicate that a portion of the basement car park will remain visible from Banks Avenue. Soft landscaping will assist in reducing the dominance of car parking, however this would be required to be located within the verge.</b></p>

Assessment against the draft Whitford Activity Centre Structure Plan		
General Development Requirements		
Requirements	Proposed	City comment
<p><b>Vehicle access locations</b> Access point and locations to be located as indicated in structure plan map or any approved local development plan. The location should be consistent with the development objectives of the district and supported by traffic analysis to the satisfaction of the City. Rationalisation of existing crossovers should also occur.</p>	<p>The development is proposed to use existing access points, as well as the creation of a new left in access from Marmion Avenue (Marmion Promenade). These access points are in accordance with the Structure Plan Map with the exception of the southern entrance from Banks Avenue immediately adjacent to the loading docks.</p> <p>No rationalisation of crossovers has occurred.</p>	<p>Main Roads WA have advised that they do not support the additional left in access from Marmion Avenue. Therefore there is no certainty that this component of the development could be developed, even if planning approval was granted. This could have traffic implications as traffic would be shifted to Whitfords and Banks Avenue.</p> <p>While the traffic analysis provided demonstrates the access point not indicated on the structure plan map, as no rationalisation has occurred, this standard has not been met.</p>
<p>Service vehicle access Service vehicle routes and access points should be away from areas of high pedestrian footfall and designed with consideration for safety, visual and acoustic amenity.</p>	<p>Loading docks are proposed on the northern and southern sides of the development. The new loading dock for the supermarket is proposed to be away from any areas of high footfall.</p> <p>The access to second loading dock on the northern portion of the site (being the loading dock for the mini majors) crosses an external pedestrian connection from the exit adjacent the new supermarket to the bus stops on Whitfords Avenue.</p> <p>The loading docks on the southern side of the development are set back a minimum of seven metres from Banks Avenue. This area would also attract low footfall on the basis of the overall design of the extension and existing shopping centre.</p> <p>An acoustic report has been submitted demonstrating that the loading docks can comply with the regulations regarding noise. Screening has also been provided to ensure that there is minimal impact on the amenity of surrounding properties.</p>	<p>The loading docks on the northern side of the Centre are considered appropriate, acknowledging that their location is driven by the overall design of the development.</p> <p>No zebra crossing has been indicated to ensure that pedestrian priority is maintained.</p> <p>On review of the acoustic report for the development, concerns were raised with the applicant as it was considered that based on the typical operation of loading docks that it would not be able to comply with noise regulations. Further information justifying this was provided, demonstrating that certain activities can be managed (including the logistical arrangements for delivery vehicles) in order to comply. This would require delivery vehicles to only be present and running for 24 minutes or less in a four hour period. It is not disputed that this could be achieved, however it is considered that this would become overly restrictive for loading vehicles, and could result in non-compliance. As such it is the City's preference that loading docks are designed and located such that compliance is not reliant on third parties.</p>
<p><b>Car park entrance</b> Entrances to parking areas to be clearly visible from street and well signed regarding directions and availability.</p>	<p>Major entrances to the car park are from key vehicle access points. The applicant has stated that all entrances would be signed, with the requirement for a car parking management plan recommended as a condition of development approval.</p>	<p>The location of entrance points to the car parking areas is considered to meet this requirement.</p> <p>No signage is indicated and therefore it is unclear as to how direction and availability would be communicated. In the absence of this information the City cannot determine if this requirement has been met.</p>
<p><b>Bicycle parking</b> 1 space per 1500sqm NLA long term 55 spaces required. 1 space per 1000sqm NLA short term 82 spaces required.</p>	<p>75 spaces provided.</p> <p>55 spaces provided.</p>	<p>The long term spaces are provided in a secure staff compound. The amount proposed is in excess of that required. The amount of short term spaces is 27 spaces less than that required.</p>
<p><b>End of Journey Facilities</b> All non-residential development is encouraged to have end of trip facilities.</p>	<p>75 bicycle lockers and ten showers (five male, five female) are provided for staff. No end of journey facilities indicated for customers.</p>	<p>This standard only encourages end of journey facilities. As no standard is provided, the development is considered to meet this requirement.</p>

Assessment against the draft Whitford Activity Centre Structure Plan		
General Development Requirements		
Requirements	Proposed	City comment
<p><u>Street and public interface</u></p> <p>Facades from the street or public realm Building to be designed with consistent approach to all façades. Architectural and visual interest to be provided to all façades visible from the public realm – through articulation, colour and/or materials.</p> <p>Corner buildings to be designed to address both streets with equal importance.</p> <p>Building entrances Main building entrances shall be directly onto the primary street frontage.</p> <p>Passive surveillance Crime Prevention Through Environmental Design Principles to be applied.</p>	<p>The extension proposes a diverse, yet consistent nature of design through a mix of glazing, composite panels, metal screening and textured concrete panelling. While all of the facades are diverse in design and heavily articulated, the colour and material palette mains consistency.</p> <p>The corner element of Marmion Promenade and Whitford Avenue addresses both frontages with the use of articulation and similar materials to each street.</p> <p>The corner element of Banks Avenue and Marmion Promenade also has a consistent approach.</p> <p>Building entrances are provided from Marmion Promenade.</p> <p>The applicant has advised that CPTED principles have been considered in the development.</p> <p>Additional information was sought from the applicant as it was unclear how this had exactly been met. The following additional detail was provided:</p> <ul style="list-style-type: none"> <li>• The application and management methods within the Designing Out Crime Prevention Guidelines will be used as a starting point in providing a designed outcome that is safe and secure. Further owner methodologies would also be applied to ensure the new development can be used and enjoyed with the full knowledge that industry led initiatives are in place.</li> <li>• Westfield have an in-depth knowledge of facility and user safety and security. This background and information provides benchmarks and objectives to ensure all centres are designed with the lowest rates of opportunities for offending and highest rates of feelings of safety. Westfield will utilise the principles of Surveillance, Access Control, Territorial Reinforcement, Target Hardening, Management and Maintenance described in the DOCPG, with particular emphasis on passive design outcomes that prevent crime and vandalism. Active security elements are standard components of all Westfield developments, and will be will be integrated into the building systems and operations of the completed centre. The DA proposal addresses these issues by: <ul style="list-style-type: none"> <li>○ Parking and landscaping areas are designed with minimal opportunities for entrapment, have access ways in view of land usages, keep clustering of trees to a minimum, do not incorporate obscure level changes, will incorporate lighting to all areas, and are within sightlines of the public spaces on the site.</li> <li>○ The public spaces will also incorporate the previously mentioned passive surveillance methods, will be extremely active with public usages, and will integrate state-of-the art CCTV and out-of-hours security monitoring.</li> <li>○ All public access points will be controlled via automated locking systems, have integrated bollard placement, and, as mentioned, CCTV and security monitoring.</li> <li>○ The private or loading access point will be gated and screened with access monitored by the centre management systems.</li> </ul> </li> </ul>	<p>This requirement is a broad statement and does not generate a specific standard that should be met. However it is considered that a high level of articulation has been provided to most facades.</p> <p>The treatment of this façade is considered to meet this requirement.</p> <p>The articulation provided to both sides of the building façade is consistent.</p> <p>It is considered to still remain unclear as to how the principles have been applied into the design of the development. While a detailed analysis has not been undertaken by the City, it is noted that:</p> <ul style="list-style-type: none"> <li>○ Only a sliding gate is indicated for the mini-major loading dock on Whitfords Avenue. No other method of restricting access is indicated for the remaining new loading docks.</li> <li>○ The location of the end of trip facilities (assumedly used only by staff) is located under a car park access ramp and within an area where there would be minimal passive surveillance. This could create a deterrent for staff using these facilities, particularly if they are leaving during times of minimal passive surveillance (ie. late at night etc.).</li> </ul> <p>It is considered that further information should be provided before this requirement could be considered to have been met.</p>

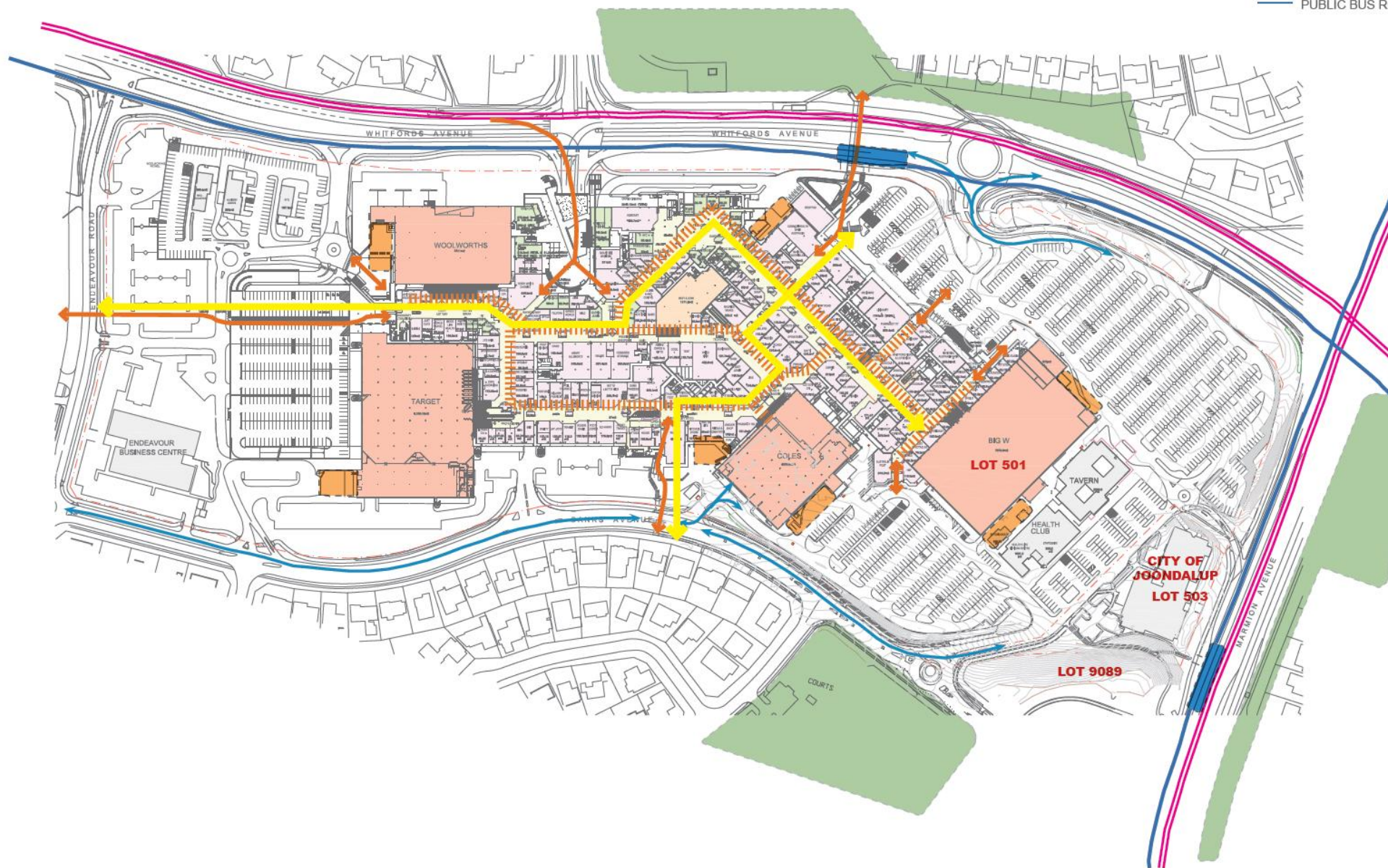
Assessment against the draft Whitford Activity Centre Structure Plan		
General Development Requirements		
Requirements	Proposed	City comment
<p>Signage, Advertising and Public Art Signage to comply with the City's signs policy</p> <p>Public art is to be provided as part of the design of landmark sites, where appropriate.</p>	<p>None proposed</p> <p>None proposed</p>	<p>Any future signage would be subject to further approvals.</p> <p>Ideally this should be provided in conjunction with this development. However, this is where the relocated accessway is proposed to be sited, which will make the provision of this element in the future difficult (ie. It is likely to need to be located in the road reserve). The provisions of the structure plan in terms of timing of this element are not clear. The applicant has requested a condition of approval setting out that a separate DA is required for this element in order to allow appropriate levels of liaison with the City in this regard.</p>
<p><u>Landscape and private open space</u> Landscape provision Landscaping to be designed to suit intense urban nature of the activity centre. Landscape to be incorporated into streetscape with consistent planting and materials.</p> <p><b>Shade trees in uncovered parking areas to be provided at 1 tree per 6 bays.</b></p>	<p>A landscape masterplan has been submitted (refer Attachment 12 of this report). This includes the incorporation of landscaping within the verge.</p> <p><b>Applicant has stated that shade trees of one shade tree per six bays have been provided.</b></p>	<p>Given the general nature of this requirement, it is unclear on how a development could meet the standard. However, it is acknowledged that the landscaping masterplan provides for a level of landscaping that they feel satisfies the structure plan.</p> <p><b>The development plans indicate that not all areas of new/remodelled car parking are provided with shade trees at this rate.</b></p>
<p><u>Roofscape</u> <b>To be considered as part of building design. Should be attractive if viewable from the public realm or any viewpoint within surrounding buildings, including future buildings.</b></p> <p>Roof mounted plant and equipment to be screened from view, including from above if necessary, with screening to be consistent with design of the building.</p>	<p><b>The applicant has stated that the roofscape is not viewable from the public realm, however articulation and landmark roof elements are provided on to Marmion Promenade through an angular glass roof, and through vertical architectural features at the intersection of Marmion Avenue and Whitford Avenue. A variety of heights are also provided on to Marmion Promenade, and Banks Avenue. This provides a diverse roofscape, both in height, colour and materials.</b></p> <p>Roof mounted plant and equipment are screened from view.</p>	<p><b>While it is considered that the roofscape as viewed from the street (public realm) would meet this requirement, it is unclear how future buildings have been considered. Particularly with higher buildings located on Endeavour Road that would be able to view the roofscape of the shopping centre.</b></p> <p>The development plans do not indicate any plant/equipment being visible. However, it is unclear if any would be visible from above.</p>
<p><u>Service areas and ancillary buildings</u> Location Service areas and refuse disposal systems to be located away from public areas and residential development.</p> <p>Screening Services and refuse area to be screened from view. Screening to be of a compatible design.</p>	<p>Service and refuse disposal areas are proposed to be located within loading docks.</p> <p>The loading docks are proposed to be screened from view, being compatible with the external articulation of building facades.</p>	<p>The development is considered to meet these requirements.</p>

Specific requirements for the Retail District		
Requirement	Proposed	City Comment
<p><u>Building Setbacks</u></p> <p>Nil to Marmion Promenade</p> <p>Three metres to all other streets</p>	<p>Applicant has stated that a nil setback has been achieved to Marmion Promenade</p> <p>Minimum 3m to all other streets is met.</p>	<p>The provision is unclear as to where the 'nil setback' should be (ie. To the pedestrian path or the road). It is considered this criteria has been met.</p>
<p><u>Pedestrian Access</u></p> <p>Primary off street pedestrian connections should be as per structure plan map – these are shown as via Marmion Promenade from Banks Avenue, from Marmion Avenue to Marmion Promenade, and from Endeavour Road into the retail centre at the western end.</p> <p>Footpaths of a minimum 2m width to be provided along all facades within 20m of mall entrances.</p>	<p>Primary pedestrian connections are from Banks and Marmion Avenue at Marmion Promenade as required.</p> <p>Adequate footpaths provided.</p>	<p>It is considered this criteria has been met.</p> <p>Future development applications for the development of the southern portion of Marmion Promenade would need to ensure that pedestrian access to Banks Avenue is maintained.</p>
<p><u>Parking Provision</u></p> <p>The City may require a traffic impact assessment and parking strategy/report for any development application.</p>	<p>Transport assessment provided. This sets out that a car parking management plan should be prepared to ensure car parking efficiency.</p>	<p>No car parking management plan has been submitted. It is considered that this is necessary in determining the appropriateness of parking and impact on surrounding land uses.</p>
<p><u>Landmark sites and community focal points</u></p> <p>Marmion Promenade</p> <p>In addition to the development standards that apply to the retail district, the following standards apply to Marmion Promenade:</p> <ul style="list-style-type: none"> <li>• Marmion promenade is to become the primary community focal point at the eastern end of the retail core. It will provide improved legibility and a direct north-south pedestrian connection through the eastern end of the centre.</li> <li>• The promenade is to extend between Banks Avenue and Whitford Avenue and have a minimum width of six metres from building facade to building facade.</li> <li>• Treatment should include generous footpath and landscape (shade trees and feature plantings).</li> <li>• A square or other appropriate space is to be provided at the entrance to the retail core.</li> <li>• A pedestrian connection from the square to the bus stop on Marmion Avenue is to be provided.</li> </ul> <p>Marmion Promenade will not be provided as a public accessway or Right of Way.</p>	<p>Development of Marmion Promenade to be finalised through a separate development application.</p>	<p>While the development of Marmion Promenade in accordance with these requirements will form part of a future application, it is noted that the development proposed as part of this application supports the development of the Promenade.</p>



<p><u>Landmark sites and community focal points cont.</u></p> <p>Landmark site at corner of Marmion Avenue and Whitfords Avenue In addition to the development standards that apply to the retail district, the following standards apply to the landmark site at the corner of Whitfords Avenue and Marmion Promenade:</p> <ul style="list-style-type: none"> <li>• The termination of Marmion Promenade should be clearly articulated using landscape treatments to signal approach to the centre from the vehicle environment of the road intersection.</li> <li>• The scale and detail of the landscape treatments should be appropriate to this environment whilst also signalling the change of character and grain anticipated within the centre.</li> <li>• Landscaping treatments could include plantings, sculpture or other hard works. Any such works should be consistent with the design theme for the redevelopment of the retail district.</li> </ul> <p>Building on Marmion Promenade at the Entry to the Retail Core:</p> <ul style="list-style-type: none"> <li>• The building fronting the proposed square on Marmion Promenade is a key element in enhancing the sense of place of the centre. It will be a distinctive beacon from Marmion Avenue as well as an improved pedestrian environment at the east end of the retail core.</li> <li>• The building must have a distinct architectural treatment visible from Marmion Avenue and Banks Avenue (aside from the need to treat facades differently on different orientations).</li> <li>• The building is to have active frontages onto Marmion Promenade and be designed to accommodate diverse activities that contribute to vitality, viability, and safety at all times of the day.</li> </ul>	<p>No landmark element is proposed on the corner of Marmion Avenue and Whitfords Avenue. The applicant has requested this be considered as part of a separate development application.</p> <p>A variety of heights, scale, land uses, materials and finer grain architectural elements will contribute to not only achieving a landmark element but a destination point for the surrounding community. The centrepiece of this will be a raised roof structure that will occur mid-street along the Promenade. This feature will function as the primary eastern entry point to the shopping centre and will be serve by a series of perpendicular lanes connecting back to the internal mall network.</p> <p>Retailers within the Marmion Promenade precinct will include food providers, mini-majors, homewares, everyday needs and casual dining. These operators will be required to address Marmion Promenade. This precinct will house a shopping and dining experience that lasts the whole day while provided an aspiration lifestyle experience. Active glazed frontages are provided.</p>	<p>There is no indication at what stage of development this landmark should be provided. However, the proposed development includes an internal accessway in the location of the landmark site as indicated on the Structure Plan Map. This would prevent the landmark from being developed within the property boundaries in the future.</p> <p>Given the scale of development proposed it would not be inappropriate for this landmark to be provided as part of this application.</p> <p>It is considered that the architectural treatments proposed highlight Marmion Promenade as a landmark site.</p> <p>Based on the artists impression it would appear that the architectural element is not visible from Banks Avenue, with the majority screened by the discount department store component.</p> <p>The development is largely considered to meet this requirement, however there is approximately 26 metres of blank facades on the southern side of the promenade.</p>
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- LEGEND
- PUBLIC OPEN SPACE
  - INTERNAL CIRCULATION
  - PEDESTRIAN MALL ACCESS
  - SITE CONNECTIVITY
  - PRIMARY VEHICULAR ACCESS
  - LOADING ZONE
  - ROAD CYCLE LANES
  - BUS STOP
  - PUBLIC BUS ROUTE



EXISTING ACCESS AND MOVEMENT DIAGRAM

EXISTING ACCESS AND MOVEMENT DIAGRAM  
**WHITFORD CITY**

Note:  
\* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details

**Westfield**  
Westfield Design & Construction Pty Ltd

**Westfield**  
RETAIL TRUST

**GIC**

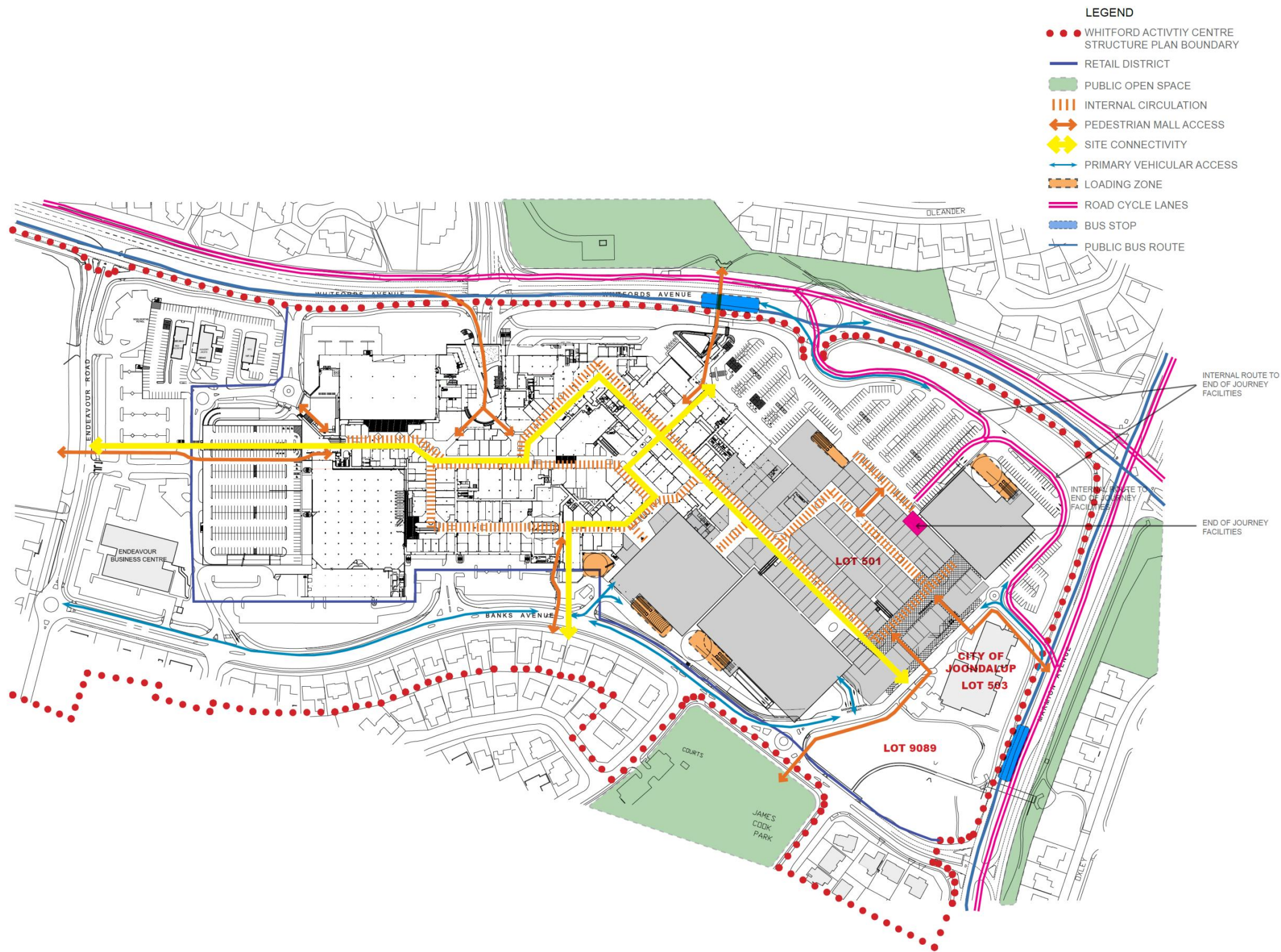
Scale	Project No.
1:1500	11310

Date
JULY 2013

Drawing no.	Revision
DA-02	A



DEVELOPMENT APPLICATION



**PROPOSED ACCESS AND MOVEMENT DIAGRAM**

**RETAIL DISTRICT ACCESS AND MOVEMENT DIAGRAM**  
**WHITFORD CITY**

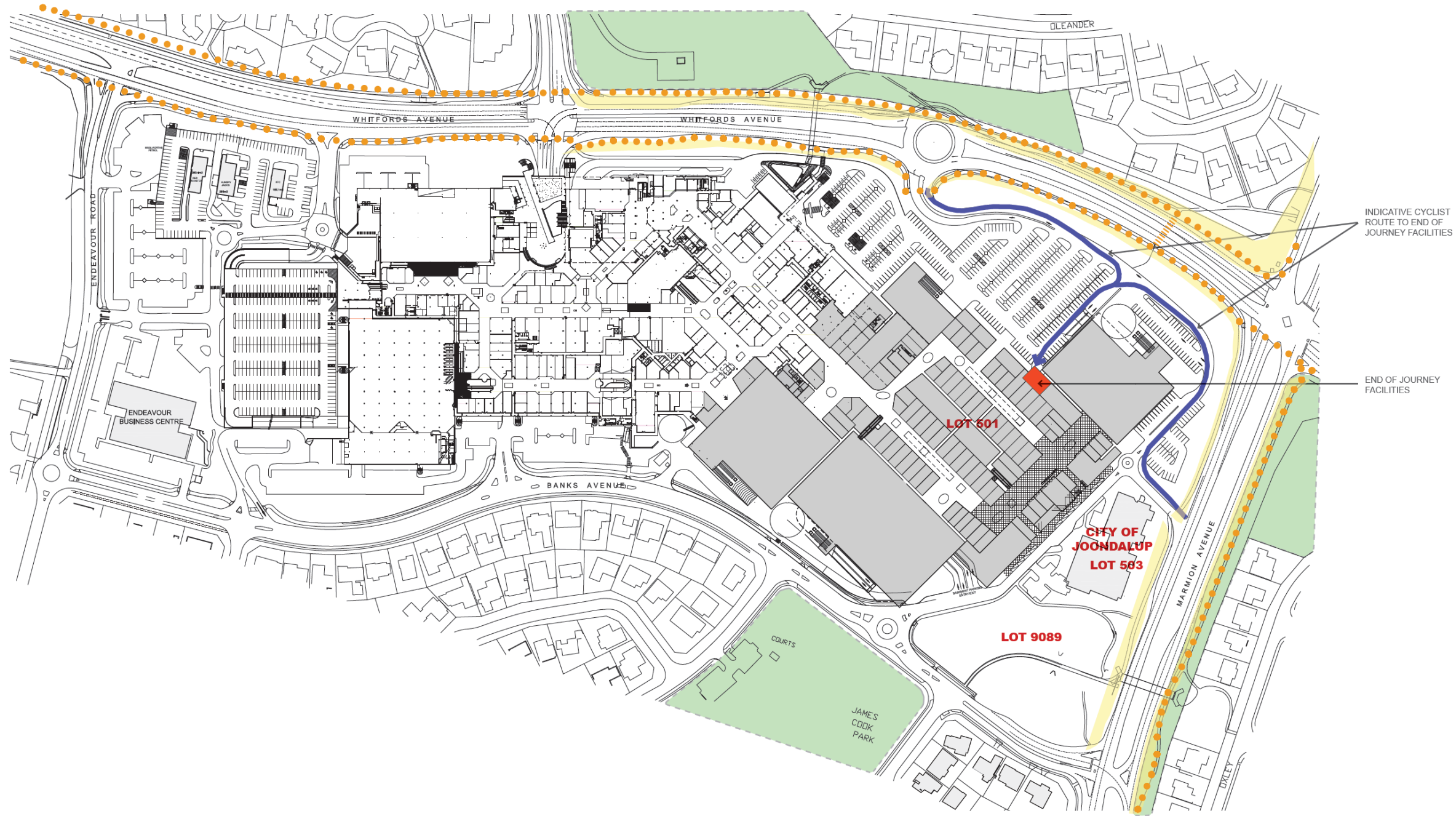
**DEVELOPMENT APPLICATION**

Note:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details.

  
 Westfield Design & Construction Pty Ltd  
  


Scale 1:1500	Project No. 11310
	Date AUGUST 2013
Drawing no. DA-03	Revision B





DEVELOPMENT APPLICATION

**CYCLIST ACCESS AND MOVEMENT DIAGRAM**  
**WHITFORD CITY**

Notes:  
\* Refer to latest project documentations for existing plans, sections, elevations, RL's, survey and details

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**Westfield**  
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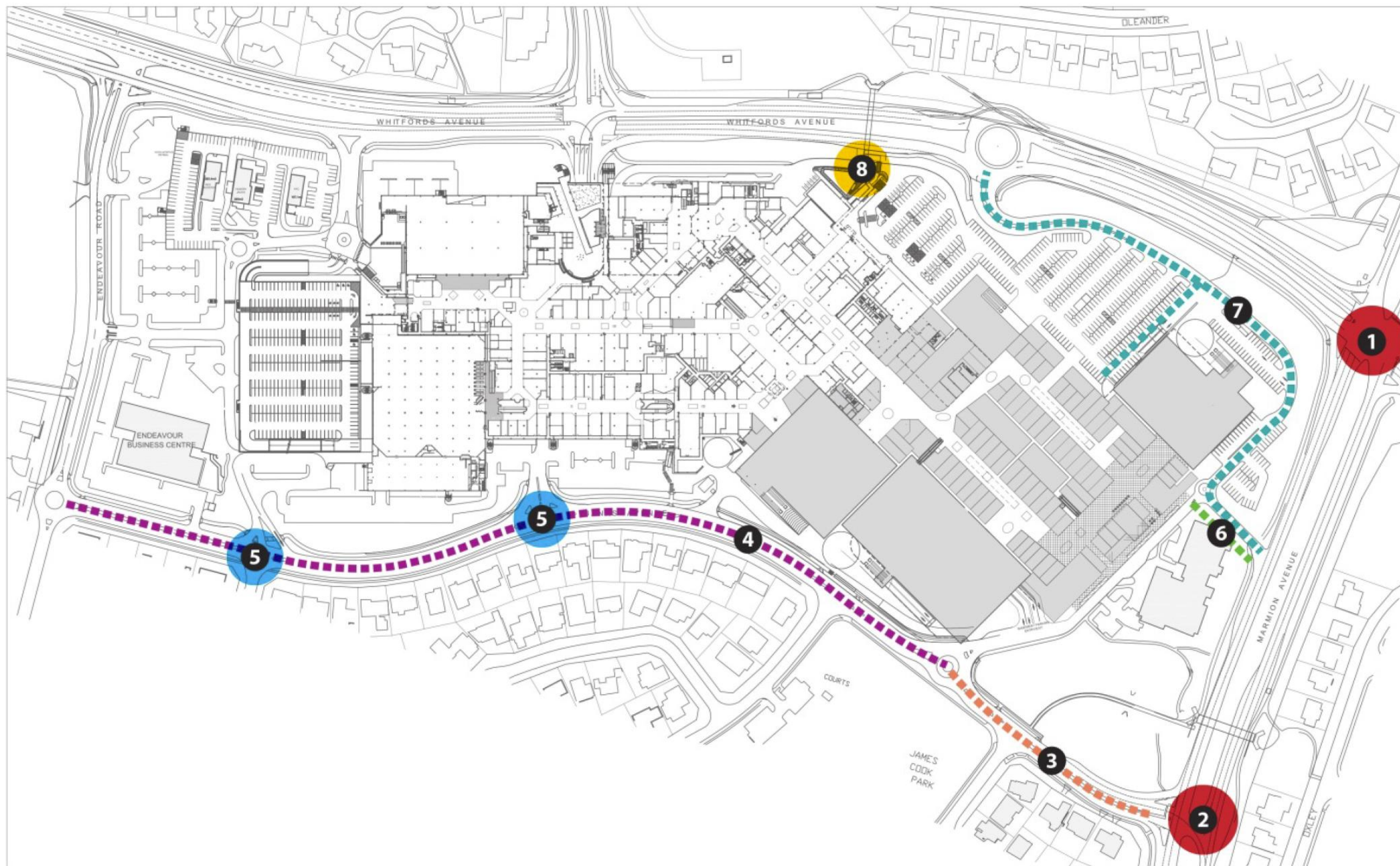
**GIC**

Scale 1:1500	Project No. 11310
	Date SEPT 2013
Drawing no. SK-006	Revision A

- LEGEND**
- PUBLIC OPEN SPACE
  - INDICATIVE CYCLIST ROUTE TO EOJF
  - SHARED PATH BY PEDESTRIANS + CYCLIST  
AS PER PERTH BICYCLE NETWORK MAP SERIES
  - BICYCLE LANES OR SEALED SHOULDER EITHER SIDE  
AS PER PERTH BICYCLE NETWORK MAP SERIES
  - AT GRADE CROSSING FROM WHITFORDS AVE  
SHARED PATH

**CYCLIST ACCESS AND MOVEMENT DIAGRAM**





LEGEND:

- |  |  |
|--|--|
| 1 Marmion / Whitford Intersection Upgrade    | 5 Splitter Island Upgrades to Banks Avenue |
| 2 Banks / Marmion Intersection Upgrade       | 6 Internal Footpath Upgrades               |
| 3 Partial Banks Avenue Cross-section Upgrade | 7 Provision of On-road Cycle Lane          |
| 4 Provision of On-street Cycle Lane          | 8 Bollards to Whitfords Avenue Underpass   |

A consultant was appointed by the City to review the transport assessment submitted within the development application. The table below is a summary of issues identified by the consultant and the response from the applicant. Given the timing of the receipt of information, further review of the applicant's response has not been undertaken. Therefore the City cannot confirm that the additional information provided addresses the City's concerns.

Baseline Traffic	
Issue identified	Response from the Applicant
<p>The 10% growth rate used for the existing background traffic volumes to 2025 is less than that from Main Roads data. Although explanation has been provided intersections may still operate over capacity during peak periods. Sensitivity testing should be undertaken as there are risks that drivers may still use the routes they currently do even if there are delays, which will further increase delays and reduce performance.</p>	<p>The assessment of the baseline traffic is based on two of the busiest days of the year for this road system. Appropriate levels of traffic growth have been added and additional shopping centre traffic has been accounted for in a robust manner.</p> <p>Given the above, sensitivity tests are not required; however, as a measure of extra robustness, sensitivity tests were conducted at the key external intersections that are close to capacity. The improved intersections can accommodate a further 12% additional background and shopping centre traffic over and above the applied traffic growth and additional shopping centre traffic as a result of this development application. This is considered more than extreme as these traffic flows would never be realised, yet this is the point where the improved intersections reach 100% capacity.</p> <p>Daily traffic growth rate has been calculated to be 10% from 2011 to 2031. This is based on historic trends in the area.</p> <p>Main Roads modelling is purported to show 17.5% north of Hepburn Avenue. It is noted that this model is demand constrained and simply assigns traffic based on the path of least resistance, it is therefore, to a certain extent, not constrained by the capacity of the road network.</p> <p>In a four stage modelling process, the mode choice stage converges on a travel mode split that results in a global minimisation of travel costs. The modelling used by Main Roads is a four stage model; however, the mode choice stage is fixed at predefined level of traffic. Therefore Main Roads model does not allow for mode shift as a result of increasing road congestion, it simply assigns the predefined traffic volumes to minimise overall travel cost, irrespective of whether links exceed capacity or not.</p> <p>The Main Roads model outputs are a measure of possible demand not traffic volume; we have been advised as such by Main Roads.</p> <p>Relying on a demand constrained model to determine actual traffic flows when historic trends indicate different is not the best way to plan development. This method results in land not reaching its development potential, over-designed road improvements and a perpetuation of passenger car use over sustainable travel modes.</p>
<p>The information provided in the transport assessment is not transparent by supplying only a baseline and design year traffic which requires a number of assumptions and adjustments that cannot be easily reviewed. Rather figures for baseline traffic, traffic growth, pass-by traffic, newly generated and assigned traffic and design year traffic should be provided.</p> <p>It is not transparent to only supply baseline traffic and design year traffic. Accordingly, there are some questions as to the accuracy of the future traffic forecasts as a number of assumptions and adjustments are made which cannot be reviewed.</p>	<p>Additional pass-by traffic is traffic that currently passes the centre but would then use the centre due to the redevelopment (i.e. it would have little to no impact at external intersection but would contribute to the Shopping Centre traffic numbers).</p> <p>Pass-by trips do occur at the existing Shopping Centre; however, as part of a robust assessment, no further pass-by traffic has been included for as part of the additional traffic generation for this development application.</p> <p>This is particularly robust for the future years, as growth is added to background traffic, yet the assumption is that none of this additional background traffic is attracted to the Shopping Centre. All additional traffic is assumed to be completely new to the area.</p> <p>It is acknowledged that baseline and design year traffic has been provided, traffic growth is 10% of background flows as described previously, therefore, traffic flow diagrams have been provided for the existing and future shopping centre traffic.</p>

<p>It does not appear that traffic generated by the additional development proposed under the Whitford Activity Centre Structure Plan has been included in the background traffic design year of 2025. If the structure plan traffic has not been accounted for there could be an underestimation of the traffic on the road, which could result in further queuing and intersection service levels.</p> <p>If the structure plan traffic has been explicitly considered, there could be an underestimation of the traffic on roads, traffic queuing, and intersection service levels.</p>	<p>The draft Whitford Activity Centre Structure Plan sets the maximum land use allowances with the Whitford Activity Centre Structure Plan Area, this development application complies with the draft Structure Plan.</p> <p>At the development application level, each application will be considered on its own merits and the merits of the transport infrastructure that will be present at the year of opening (either existing or realised through committed and funded/conditioned improvements).</p> <p>Therefore, there is no need to assess all Structure Plan traffic in each development application (the Structure Plan already does this, albeit at a higher level). The City can rest assured that the development of the Whitford Activity Centre Structure Plan Area can be controlled through the usual development application process. Development of land can only take place if it can be demonstrated that the infrastructure is there (or will be there) to support, if not, the City can recommend refusal.</p>
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Trip Generation and Assignment	
Issue identified	Response from the Applicant
<p>It is not clear if allowance has been made for traffic exiting one egress point and circumnavigating the road network through multiple intersections as opposed to exiting the shopping centre and directly leaving the area.</p>	<p>Observations (traffic counts) indicate that drivers do preferentially travel past the first (or more) Centre accesses they come across in order to access the Centre at another location. Similarly, traffic exiting the centre is known to travel through one or more of the key external intersections.</p> <p>This has been accounted for in the modelling undertaken and submitted to the City of Joondalup.</p>
<p>Most of the new development is at the eastern end of the shopping centre and it is not clear whether it has been weighed accordingly. While there appears to be a small increase in the percentage of vehicles entering at the eastern end, there is no explanation to this.</p> <p>This could have a significant effect on the performance of intersections, particularly those currently having minor low traffic volumes, if it has not been allowed for.</p>	<p>For the purposes of analysis, the overall existing traffic volume at each access is lifted by 10 percent. The remaining additional traffic is assigned to the new parking structure at the eastern end of the site.</p>

External intersection and impact analysis	
Issue identified	Response from the Applicant
<p>The proposed intersection of Marmion Avenue and Marmion Promenade has not been examined. Advice from Main Roads on the development application has indicated that this intersection is not supported. Potential queuing at intersections without this road has not been analysed and could affect storage capacity, impacting on the road network; our initial observations suggest this should be analysed.</p>	<p>As previously advised, Main Roads WA has strongly advocated the construction of this intersection in previous development applications.</p> <p>Notwithstanding this, the intersection performance has been assessed based on the left-in access being removed. The roads and intersections most affected by this change are along Banks Avenue, where the majority of the additional traffic will enter the Shopping Centre in the “no left-in” scenario. The intersections along Banks Avenue will continue to perform adequately during peak traffic conditions.</p>
<p>The forecast queuing on the southern arm of Marmion Ave/Whitfords Avenue during both the Thursday and Saturday peak extend beyond the proposed new intersection at Marmion Promenade. Queues in the Thursday peak also extend to the intersection of Banks Ave/Marmion Ave.</p> <p>The analysis undertaken by the applicant as part of the transport assessment does not account for the interaction between intersections, and this would have been better captured through simulation/transit modelling to help understand the potential traffic and safety issues. If the changes to traffic light phasing are not supported by Main Roads WA then this queuing would be further exacerbated.</p>	<p>The queue interaction can be mitigated by coordinating the signals along Marmion Avenue to minimise stops and reduce queue build-up during red phases. It is clear the key external intersections all perform better when the proposed, very significant, physical improvements are implemented.</p>

<b>External intersection and impact analysis</b>	
<b>Issue identified</b>	<b>Response from the Applicant</b>
<p>The analysis undertaken by the applicant as part of the transport assessment indicate that pedestrian phasing has not been accounted for in signal design or a justification of pedestrian flows.</p> <p>Assumptions have been made in the trip generation assumptions that the mode share for pedestrian is increasing over time, thus decreasing the car trips associated with the shopping centre and hence the supply of parking bays. If this significant increase in pedestrian access has not been accounted for in the signal phasing this would have a detrimental effect on intersections performance.</p> <p>Without this being taken into consideration it could result in an underestimation of the delays and queues expected.</p>	<p>There are four signalised intersections in this assessment.</p> <ul style="list-style-type: none"> <li>• <i>Marmion Avenue/Whitfords Avenue</i>: pedestrian demand is observed to be very low at present as there are pedestrian subways available across Marmion Avenue, which will be used in preference to crossing at the intersection itself due to the long cycle times (over 2 minutes) and resulting pedestrian delay.</li> <li>• <i>Marmion Avenue/Banks Avenue</i>: pedestrian phase exists across Banks Avenue only, Marmion Avenue through traffic phase far exceeds the minimum pedestrian green time across Banks Avenue. Inclusion will have no change. There are pedestrian subways available across Marmion Avenue, which will be used in preference to crossing at the intersection itself due to the long cycle times and resulting pedestrian delay.</li> <li>• <i>Whitfords Avenue/Dampier Avenue/Shopping Centre</i>: Little pedestrian demand at present during road network peaks; We acknowledge this could increase in future. Inclusion of pedestrian phases results in worst case the intersection operating at a moderate level of service. This is the same service level as included in the previous analysis; the inclusion of pedestrian phases therefore has little effect.</li> <li>• <i>Whitfords Avenue/Endeavour Road</i>: Little to no pedestrian demand at present during road network peaks; we acknowledge this could increase in future. The pedestrian times are close to the traffic phase times and inclusion of pedestrian phases results in very little difference to the model outputs.</li> </ul>
<p>Traffic queues on the intersection of Banks Avenue and the main entrance to the shopping centre from Whitford Avenue will extend 48 metres back into the shopping centre car park on Saturdays. This will block the access to the basement car park under David Jones. In turn if vehicles are not able to exit this basement car park, queues will extend into the basement car park. Based on the forecast queuing, internal congestion is likely.</p>	<p>The assessment has been completed for the peak hour during two of the highest traffic demand days of the year. The queue occurs for only 3-minutes of that peak hour.</p> <p>This is considered an extreme situation that is acceptable for the short situation over which it occurs. It is not reasonable to expect infrastructure such as additional lanes to be provided to accommodate such rare events.</p>
<p>Traffic analysis using the intersection analysis software used by the applicant is not considered appropriate for closely spaced intersections subject to congestion, queuing and traffic spillback. Due to the number of access points, the surrounding road network and their close interaction a network based model (e.g. micro simulation model) would provide a more explicit understanding to properly assess cumulative network impacts.</p> <p>The analysis provides no confidence of the network impacts and could lead to misleading conclusion on the operation of the road network.</p>	<p>We do not agree that microsimulation is required as it is of no benefit given the clear improvement in operations achieved through physical works and resulting signal time reallocation these permit.</p> <p>Furthermore, Main Roads WA have advised they do not require any microsimulation modelling to be undertaken.</p> <p>It is clear that the proposed intersection improvements result in a road network that will perform better than it does at present. This will actually minimise queue interaction, further negating the need to assess this road network in a microsimulation modelling environment.</p> <p>Additionally, we advise that all modelling merely assists professional judgement, it is not a substitute. If the City of Joondalup required a microsimulation model of this road network to be completed, this should have been highlighted in pre-application discussions which began on 9 January 2013. Microsimulation is a substantial undertaking and in this case it is considered to be of minimal benefit due to the very clear improvement to the performance of the key intersections.</p>
<p>A double right hand turn on the northern approach of Marmion Avenue and Whitfords Avenue is proposed. This would not be easily added given there is a pedestrian underpass at this location and an additional lane would remove the current ventilation area.</p>	<p>We are confident that a satisfactory solution can be achieved as part of the design process.</p>
<p>The traffic movements summarised in the transport report that the cycle times that are used in the analysis are significantly different to the existing situation. For example, at Marmion Avenue and Whitfords Avenue, the current light cycle time is 180 seconds and this has been reduced to an optimal (for the analysis area) traffic light cycle time of 110 seconds for the analysis.</p> <p>Whilst this would improve intersection performance, it does not consider the effect this will have on the wider network and vehicle progression along Marmion Avenue. Advice from Main Roads WA indicates that their approval has not been given, and if it cannot be obtained this will have significant impact on traffic queues and intersection service levels surrounding the shopping centre.</p>	<p>It is clear that the Primary Regional Road, Marmion Avenue, experiences an improved level of service as a result of the physical works and reallocated timings. Main Roads has advised Cardno that the Primary Regional Road should be given priority; the submitted analysis shows a clear benefit to this route.</p>



<b>Car and Bicycle Parking</b>	
<b>Issue identified</b>	<b>Response from the Applicant</b>
<p>A car park efficiency rate has been assumed at 95% with the justification of over 98% being utilised currently.</p> <p>However, from the surveys conducted there was several cars observed not parking in bays as well as cars parking in the overspill zone although there were more than ample bays available. From the data it is evident that the maximum utilisation is closer to 86% and 95% on Thursday nights and Saturday respectively.</p> <p>The efficiency factor does not make allowances for time that patrons will spend driving around the car park looking for a parking spot. As the shopping centre currently has no parking management techniques such as signs showing where available bays are, green and red lights shown above bays to indicate availability, it is likely this would be high.</p> <p>Based on current behaviours there appears to be an undersupply in parking proposed accepting the Car Parking Management Plan is implanted. It is required that either more parking is provided of the Car Parking Management Plan is implemented.</p>	<p>The Whitford City parking assessment applied the same methodology and reasoning used at Lakeside Joondalup for a similar department store extension:</p> <ul style="list-style-type: none"> <li>• “<i>The Dimensions of Parking</i>”, by the Urban Land Institute and National Parking Association, defines effective parking supply as the occupancy at which optimum efficiency is reached: generally ranging from 85 to 95 percent of car park capacity.</li> <li>• “<i>Parking</i>”, by Robert Weant and Herbert Levinson, for the Eno Foundation for Transportation, suggests that a 95 percent factor should be used for regional shopping centres.</li> </ul> <p>It is proposed that a Parking Management Plan is prepared as a development application condition.</p>
<p>In order to activate the area and encourage people to utilise active modes of transport, bicycle racks should be provided strategically around the shopping centre and easily accessible for shoppers. For workers, racks and end of trip facilities should be provided.</p> <p>There is a risk that too few bays are being provided and that workers at the western end will not utilise the end of trip facilities as they may perceive them to be too far away. Given the emphasis on the shift from vehicles to other modes of transport this should be justified.</p>	<p>Agreed that bicycle parking should be amply and conveniently provided for customers. It is intended that they will be provided, as will end-of-trip facilities for staff along with clear wayfinding signage.</p>
<p>It is not clear how many motorcycle/scooter bays are provided. SPP 4.2 states that 5-10% of all bays should be provided for motorcycles and bicycles in secure facilities.</p>	<p>5-10% of all bays will be motorcycle/scooter parking as per SPP 4.2</p>
<p>The basement car park access under David Jones (map DA-09) should be single ingress and egress on Marmion Promenade and widen into two lanes each way back from the Promenade, particularly on the egress.</p> <p>The current configuration could cause confusion for drivers and safety issues. If the existing left lane was made left only, and right lane made right only, drivers would be forced to decide which way they were going to turn back into the car park. This could annoy/confuse drivers and they could make ‘illegal turns’ which would be a safety issue.</p>	<p>Traffic movements at this location can be controlled through appropriate signage and painted line markings. This can form a condition of planning consent.</p>
<p>On drawing DA-09, the area designated for delivery vehicles is unlikely to be able to accommodate these vehicles due to the size and direction. Larger vehicles will be required to perform multiple point turns and could cause queuing issues in the car park/potential safety issues for passer by pedestrians travelling to and from the shopping centre from their vehicles. A swept path analysis should be undertaken for potential manoeuvres.</p>	<p>Amended plans have been provided to the City demonstrating this information</p>

<b>Car and Bicycle Parking</b>	
<b>Issue identified</b>	<b>Response from the Applicant</b>
<p>On drawing DA-09 end of trip facilities provided for cyclists are located near a major entrance to the shopping centre which is compliant with the Green Star Building Accreditation system but these facilities are not easily accessible by cyclists which are required for the rating. In order to reach these from the external network, cyclists would be required to travel through the car park (safety issue) or travel along the café strip on the northern side of the building.</p> <p>If the facilities are not easily accessible there is a safety concern that cyclists could be hit by reversing cars in the car park or a risk they will not be utilised to their full potential. The facilities should be provided so they are easily and safely accessible from the external cyclists' pathway/network. There is potential to provide these enar the Whitfords avenue bus stop near Westpac Bank if this area is converted to being more pedestrian friendly as suggested.</p>	<p>Cycle routes shown on DA plans are indicative routes between external cycling facilities (external on-road lanes and shared paths). Confident cyclists that use on-road cycle lanes to reach Whitford City will have no difficulty traversing a relatively slow speed car park. It is noted that an at-grade crossing is provided along Whitfords Avenue, between Marmion Avenue and the Shopping Centre Roundabout; this continues into the site, providing a route from external shared paths and leaving only a short distance to cover within the customer car park. Wayfinding signage will also be provided as part of the Car Park Management Plan.</p>

<b>Pedestrian and cyclist access</b>	
<b>Issue identified</b>	<b>Response from the Applicant</b>
<p>Based on the justification provided, the proposed development does not dramatically assist in achieving the estimated 10,000 walking trips within the structure plan area catchment. Furthermore, improvements proposed are not considered dramatic enough to support such a modal shift.</p> <p>There is a risk that the proportion of patrons that access the centre by walking or cycling will not increase and thus the car mode share for the future scenarios should be equal to the current situation. This will increase the vehicles on the roads surrounding the centre and impact the performance of the intersections.</p>	<p>It is important not confuse the wider development pedestrian catchment with the internal, shared walking trips between onsite land uses. For the purpose of this analysis, pedestrians are assumed to return to their origin after each internal trip (i.e. home-office-home).</p> <p>Complex trip chains (i.e. home-office-retail-home) have not been considered in this analysis as these would have no additional impact on the requirements for road infrastructure or services. This assumption therefore retains the same number of overall person-trips as a single-purpose analysis, which is considered to be a reasonable simplification of the multi-modal trip generation model.</p> <p>At present the internal capture is considered minimal compared to the overall trip generation of the development. This is principally due to the fact that the existing development is a large shopping centre with a relatively small amount of other freestanding sites. The size of the site is approximately doubling in terms overall floor area. This would increase the base 1,000 internal trips to 2,000 if all this growth was confined to a like for like expansion of the existing land uses.</p> <p>However, the floor area of the office space and numbers of dwellings are proposed to more than double, or more than triple in the case of office space. Increasing the floor area of these components at a much higher rate than the shopping centre expansion will vastly increase the amount of shared and reciprocal internal trips, where currently there is a negligible need to walk to between internal land uses.</p> <p>Furthermore, the internal pedestrian catchment is largely unrelated to improvements to external infrastructure, though research suggests that patrons using alternative transport modes are more likely to utilise multiple services at a given destination.</p>

<b>Public Transport</b>	
<b>Issue identified</b>	<b>Response from the Applicant</b>
<p>Based on the justification provided, the proposed development does propose significant changes to public transport that would contribute to the modal shift proposed under structure plan.</p> <p>The assumption is that public transport mode share will increase over time although there are no real changes to the infrastructure or services. If this mode share does not increase, then the amount of car trips will increase from that proposed and this will increase traffic on the roads.</p>	<p>Agreed.</p>



Green Star Point Summary  
Westfield Whitford City  
Retail Centre Design v1

<b>Management (Weighting = 0.67)</b>		<b>Available</b>	<b>4 Star Targets</b>	<b>Compliance Strategy</b>
Man-1	Green Star Accredited Professional	2	2	GSAP to be appointed from schematic
Man-2	Commissioning Clauses	2	2	Specifications to include for commissioning to CIBSE
Man-3	Building Tuning	1	1	Specification to increase for a 12 month tuning period by major services with quarterly updates
Man-4	Independent Commissioning Agent	1	0	ICA is an additional cost and complexity, consider for 5 star strategy and above.
Man-5	Building Guides	2	2	Common practice
Man-6	Environmental Management	2	2	EMP to be developed and the contractor is to be ISO14001 Accredited.
Man-7	Waste Management	2	2	80% of waste to be reused or recycled
Man-8	Waste and Recycling Management Plan	2	2	To be developed to ensure ongoing waste is management appropriately and spacial requirements are satisfied.
Man-9	Building Management Systems	1	1	BMS with energy and water monitoring functions.
Total unweighted		15	14	
Total weighted		10	9.33	

<b>Indoor Environment Quality (Weighting = 0.86)</b>		<b>Available</b>	<b>4 Star Targets</b>	<b>Compliance Strategy</b>
IEQ-1	Ventilation Rates	3	0	Not targeted as the outside air rates to be increased to 11.25l/s/person to achieve the credit, which will impact coil and chiller capacity due to the impact on the peak day.
IEQ-2	Air Change Effectiveness	1	0	Additional cost for modelling and complexity with tenancy arrangements. Consider for 5 star option and above
IEQ-3	Carbon Dioxide Monitoring and Control	1	1	CO2 sensor per return air duct plus oversizing of the fresh air system lead to additional costs and complexity. Consider for 5 star option and above
IEQ-4	Daylight	1	1	Large quantity of skylights should achieve 1 credit
IEQ-5	Thermal Comfort	1	1	PMV levels, calculated in accordance with ISO7730, are achieved between -1.5 and +1.5, inclusive.
IEQ-6	Hazardous Materials	1	1	Any demolished areas to have a hazardous materials survey conducted
IEQ-7	Internal Noise Levels	1	1	Noise levels to be included in specification and construction
IEQ-8	Volatile Organic Compounds			
	Section 1: Paint	1	1	Common practice
	Section 2: Carpets and Flooring	1	1	Common practice
	Section 3: Adhesives and sealants	1	1	Common practice
IEQ-9	Formaldehyde Minimisation	1	1	Common practice
IEQ-10	Mould Prevention	1	0	Only recommended for 6 star strategy due to additional plant and controls
Total unweighted		14	9	
Total weighted		12	7.71	

<b>Energy (Weighting = 0.89)</b>		<b>Available</b>	<b>4 Star Targets</b>	<b>Compliance Strategy</b>
Ene-1	Greenhouse Gas Emissions	20	8	6 points should be achievable with an efficient VAV design and good controls. 9 points may be achieved by using the spill air from the tenancies to condition the mall space with wider comfort bands



Green Star Point Summary  
Westfield Whitford City  
Retail Centre Design v1

11+ points will need an energy generation system, trigeneration or PV system

Ene-2	Energy Sub-metering	2	2	Common practice
Ene-3	Peak Energy Demand Reduction	2	0	Large portion of energy generation required to reduce the peak demand, typically a tri-generation system is required.
Ene-6	Car Park Ventilation	3	1	One point may be achieved is 25% of the car parking is naturally ventilated.
Total unweighted		27	11	
Total weighted		24	9.78	

<b>Transport (Weighting = 0.67)</b>		<b>Available</b>	<b>4 Star Targets</b>	<b>Compliance Strategy</b>
Tra-1	Provision of Car Parking	2	0	Overall car parking strategy to be investigated
Tra-2	Fuel Efficient Transport	1	1	Overall car parking strategy to be investigated
Tra-3	Cyclist Facilities	3	2	4 star strategy - 5% of building staff located in the building with access to showers and lockers. 5 star strategy - 5% of building staff located in the building with access to showers and lockers. Plus tenant cyclist facilities 6 star strategy - 10% of building staff located in the building with access to showers and lockers. Plus tenant cyclist facilities
Tra-4	Commuting Mass Transport	5	3	Unlikely to achieve greater than 3 credits in this location.
Tra-5	Trip Reduction Mixed-Use	1	0	Unlikely to be achieved without apartments within 250m.
Total unweighted		12	6	
Total weighted		8	4.00	

<b>Water (Weighting = 0.91)</b>		<b>Available</b>	<b>4 Star Targets</b>	<b>Compliance Strategy</b>
Wat-1	Occupant Amenity Water	10	4	High efficiency fittings will achieve 4 points, to enhance the number of points a rain water or grey water system will need to be incorporated to provide water to the cooling towers or bathrooms.
Wat-2	Water Meters	3	3	Common practice
Wat-3	Landscape Irrigation	1	1	Any landscaping to use rain water
Wat-4	Heat Rejection Water	8	0	Cooling towers to utilise rain water to provide 50% of water requirements. Consideration to a hybrid air cooled/water cooled cooling tower noting that there is an energy penalty.
Wat-5	Fire System Water	1	1	Fire system drain down and capture to be implemented. Can be used with Jockey Pumps to minimise storage space.
Total unweighted		23	9	
Total weighted		21	8.22	

<b>Materials (Weighting = 0.43)</b>		<b>Available</b>	<b>4 Star Targets</b>	<b>Compliance Strategy</b>
Mat-1	Recycling Waste Storage	3	3	Adequate waste and recycling storage space to be provided
Mat-2	Building Reuse	6	4	Reuse of existing structure
Mat-3	Recycled Content & Re-used Products & Materials	3	0	Difficult and expensive to achieve the required levels of material reuse.
Mat-4	Concrete	3	2	2 credits targeted for using recycled aggregate and replacement of portland cement in 30% for in-situ concrete, 20% for pre-cast concrete and 15% for stressed concrete
Mat-5	Steel	2	1	1 credit targeted for the 4 and 5 star options. 2 credits required for the 6 star option.
Mat-6	PVC Credit	2	2	Has become relatively easy to achieved - noted cost impacts for limited trades, such as sub-main cables.
Mat-7	Sustainable Timber	2	0	May incur cost impacts depending on the extent of timber used in the



Green Star Point Summary  
Westfield Whitford City  
Retail Centre Design v1

				finishes.
Mat-8	Design for Disassembly	1	0	Not targeted
Mat-9	Dematerialisation	1	0	Not targeted
	Total unweighted	23	12	
	Total weighted	10	5.22	

<b>Land Use &amp; Ecology (Weighting = 1.33)</b>		Available	4 Star Targets	Compliance Strategy
Eco-0	Conditional Requirement	0	0	Achieved
Eco-1	Topsoil	1	1	No top soil
Eco-2	Reuse of Land	1	1	Land has been completely reused
Eco-3	Reclaimed Contaminated Land	N/A		No contaminated land
Eco-4	Change of Ecological Value	4	1	Automatically achieves one point
	Total unweighted	6	3	
	Total weighted	8	4.00	

<b>Emissions (Weighting = 0.50)</b>		Available	4 Star Targets	Compliance Strategy
Emi-1	Refrigerant ODP	1	1	All HVAC to use zero ODP refrigerants
Emi-2	Refrigerant GWP	2	0	Low GWP refrigerants are difficult to source and can cause other issues with safety.
Emi-3	Refrigerant Leak Detection	2	0	Refrigerant leak detection system to be incorporated into 5 and 6 star design.
Emi-4	Insulant ODP	1	1	All thermal insulation to have a ODP of zero.
Emi-5	Stormwater			
	Section 1: Main section	2	0	Maybe difficult to achieve based on the refurbishment nature and access to storage tank inclusion.
	Section 2: 3rd Point	N/A		0 Not targetted due to space
Emi-6	Discharge to Sewer			
	Section 1: Main section	4	2	Reduced flows based on the significant reduction in water consumption.
	Section 2: Blackwater treatment	N/A		No blackwater treatment
Emi-7	Light Pollution	1	1	No light to directly beam out of the site
Emi-8	Legionella	1	0	No water based heat rejection plant not advised due to energy penalty
	Total unweighted	14	5	
	Total weighted	7	2.50	

<b>Innovation (Weighting = 1.00)</b>		Available	4 Star Targets	Compliance Strategy
Inn-1	Innovative Strategies & Technologies	2	0	
Inn-2	Exceeding Green Star Benchmarks	2	0	
Inn-3	Environmental Design Initiatives	1	0	
	Total unweighted	5	0	
	Total weighted	5	0.00	
<b>Grand total unweighted</b>		139	69	
<b>Grand total weighted</b>		105.00	50.76	



## City of Joondalup Environmentally Sustainable Design Checklist

Under the City's planning policy, *Environmentally Sustainable Design in the City of Joondalup*, the City encourages the integration of environmentally sustainable design principles into the construction of all new residential, commercial and mixed-use buildings and redevelopments (excluding single and grouped dwellings, internal fitouts and minor extensions) in the City of Joondalup.

Environmentally sustainable design is an approach that considers each building project from a 'whole-of-life' perspective, from the initial planning to eventual decommissioning. There are five fundamental principles of environmentally sustainable design, including: siting and structure design efficiency; energy efficiency; water efficiency; materials efficiency; and indoor air quality enhancement.

For detailed information on each of the items below, please refer to the *Your Home Technical Manual* at: [www.yourhome.gov.au](http://www.yourhome.gov.au), and *Energy Smart Homes* at: [www.clean.energy.wa.gov.au](http://www.clean.energy.wa.gov.au).

This checklist must be submitted with the planning application for all new residential, commercial and mixed-use buildings and redevelopments (excluding single and grouped dwellings, internal fitouts and minor extensions) in the City of Joondalup.

The City will seek to prioritise the assessment of your planning application and the associated building application if you can demonstrate that the development has been designed and assessed against a national recognised rating tool.

Please tick the boxes below that are applicable to your development.

### Siting and structure design efficiency

Environmentally sustainable design seeks to affect siting and structure design efficiency through site selection, and passive solar design.

Does your development retain:

- existing vegetation; and/or
- natural landforms and topography.

Does your development include:

- northerly orientation of daytime living/working areas with large windows, and minimal windows to the east and west;
- passive shading of glass;
- sufficient thermal mass in building materials for storing heat;



- insulation and draught sealing;
- floor plan zoning based on water and heating needs and the supply of hot water; and/or
- advanced glazing solutions.

## Energy efficiency

Environmentally sustainable design aims to reduce energy use through energy efficiency measures that can include the use of renewable energy and low energy technologies.

Do you intend to incorporate into your development:

- renewable energy technologies (e.g.: photo-voltaic cells, wind generator system, etc.) and/or
- low energy technologies (e.g.: energy efficient lighting, energy efficient heating and cooling, etc.) and/or
- natural and/or fan forced ventilation.

## Water efficiency

Environmentally sustainable design aims to reduce water use through effective water conservation measures and water recycling. This can include stormwater management, water reuse, rainwater tanks, and water efficient technologies.

Does your development include:

- water reuse system(s) (e.g.: greywater reuse system); and/or
- rainwater tank(s).

Do you intend to incorporate into your development:

- water efficient technologies (e.g.: dual-flush toilets, water efficient showerheads, etc.).

## Materials efficiency

Environmentally sustainable design aims to use materials efficiently in the construction of a building. Consideration is given to the lifecycle of materials and the processes adopted to extract, process and transport them to the site. Wherever possible, materials should be locally sourced and reused on-site.

Does your development make use of:



- recycled materials (e.g.: recycled timber, recycled metal, etc.);
- rapidly renewable materials (e.g.: bamboo, cork, linoleum, etc.); and/or
- recyclable materials (e.g.: timber, glass, cork, etc.).
- natural/living materials such as roof gardens and “green” or planted walls.

### Indoor air quality enhancement

Environmentally sustainable design aims to enhance the quality of air in buildings, by reducing volatile organic compounds (VOCs) and other air impurities such as microbial contaminants.

Do you intend to incorporate into your development:

- low-VOC products (e.g.: paints, adhesives, carpet, etc.).

### ‘Green’ Rating

Has your proposed development been designed and assessed against a nationally recognised “green” rating tool?

- Yes  No

If yes, please indicate which tool was used and what rating your building will achieve:

The equivalence of a a 4 star Green Star - Retail v1 reating will be targeted for the extension. In addition the equivalence of a 3.5 star NABERS Energy rating will be targeted. The body of the Ecological Sustainable Design Report [A] nominates the initiatives to be included as well as the likely Green Star strategy.

These ratings cannot be committed at this stage without additional works being carried out.

If yes, please attach appropriate documentation to demonstrate this assessment.

**If you have not incorporated or do not intend to incorporate any of the principles of environmentally sustainable design into your development, can you tell us why:**

N/A

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**Is there anything else you wish to tell us about how you will be incorporating the principles of environmentally sustainable design into your development:**

The body of the Ecological Sustainable Design Report [A] nominates a range of initiatives to be included in the development of the design as well as the likely Green Star strategy. Westfield are committed to reducing resource consumption, making a space for people and meeting all codes and ratings throughout the design, construction and operation of the retail centre.

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When you have checked off your checklist, sign below to verify you have included all the information necessary to determine your application.

Thank you for completing this checklist to ensure your application is processed as quickly as possible.

Applicant's Full Name: \_\_\_\_\_ Contact Number: \_\_\_\_\_

Applicant's Signature: \_\_\_\_\_ Date Submitted: \_\_\_\_\_

Accepting Officer's Signature: \_\_\_\_\_

“The landscape form is derived through a sequence of spatial transitions”

### 1. ARRIVAL

Create a sense of arrival and destination

- / Develop key entry markers through structural palm planting to delineate arrival points.
- / Incorporate the use of strong robust feature planting on the ground plain.
- / Use large gravel aggregates as mulch to define entry points.



### 2. FORMAL TRANSITION

Generate lineal forms across the ground plain pertaining to pedestrian movements

- / Emphasise and focus the views inward to the shopping precinct.
- / Reinforce directional quest along the ground plain through planting, paving materials and feature walls.
- / Maintain a level of shade along the movement lines.
- / Develop a larger grain in paving and materials and mass plantings.



### 3. BREAKING DOWN THE TRANSITION

Break down the lineal ground plain along the facade interfaces with organic forms and shapes.

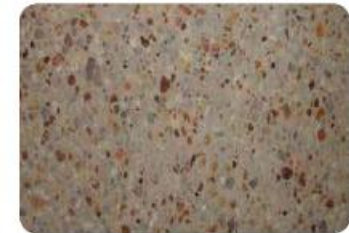
- / Generate a landscape language overlay with strong organic forms and shapes.
- / Incorporate water feature elements to have edges more organic in form.
- / Provide tree clumping in informal shaded groves.
- / Provide places for pausing at the edges.
- / Break down the grain of materials



### 4. INFORMAL IMMERSION

Create intimate and welcoming informal mingling spaces leading into to the inner shopping precinct.

- / Fragment the landscape into pockets of greenery throughout the internal mall space.
- / Incorporate finer grain paving and planting material.



**ARRIVE** AT THE DESTINATION

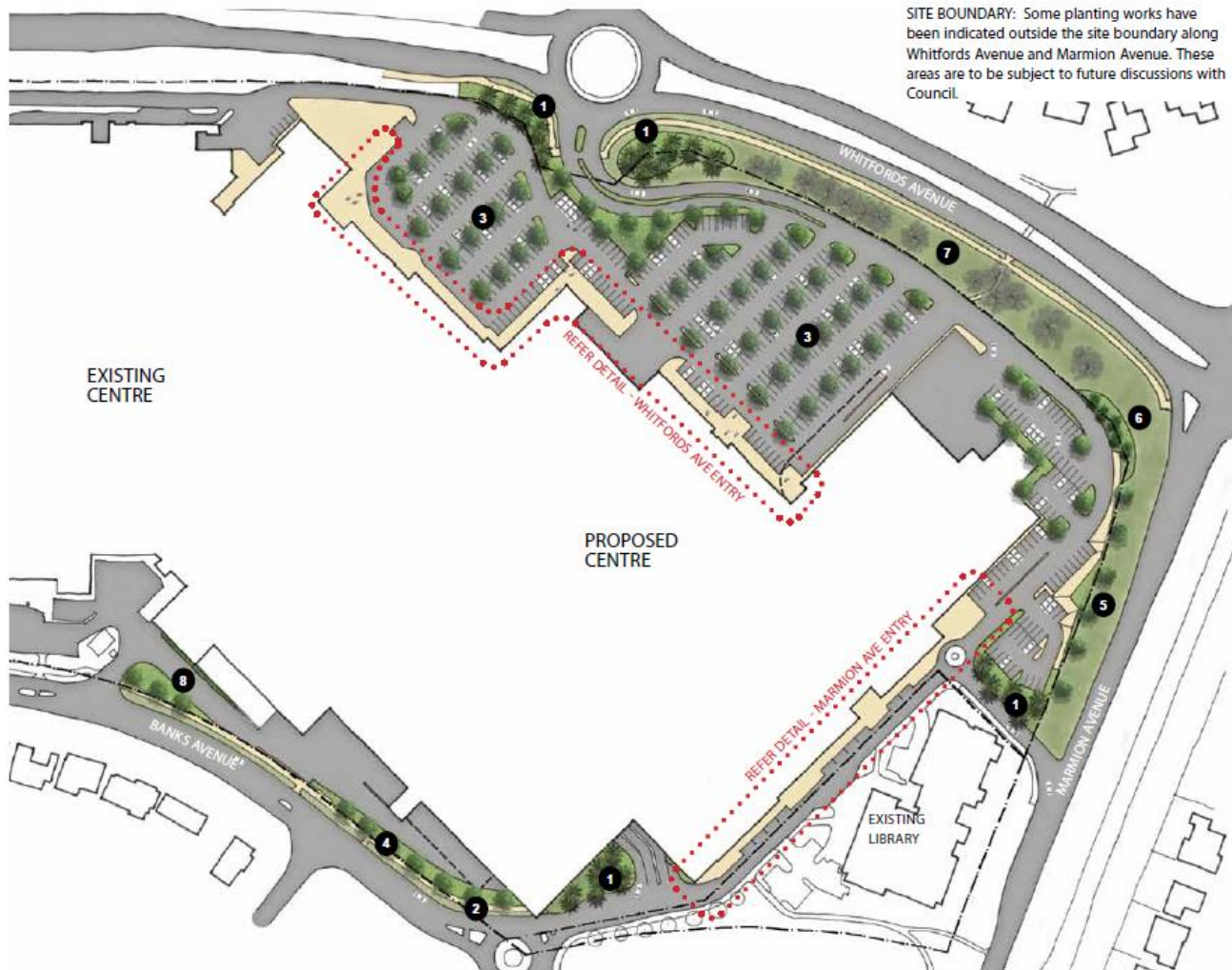
**TRANSITION** TO THE EDGES

**PAUSE** AT THE EDGES

**IMMERSE** YOURSELF IN THE SPACE



**MOVEMENT / EXPERIENCE**



SITE BOUNDARY: Some planting works have been indicated outside the site boundary along Whitfords Avenue and Marmion Avenue. These areas are to be subject to future discussions with Council.

A simple palette of plants is proposed for the outer areas of the shopping centre. Groupings of semi mature Phoenix canariensis (Canary Island Date Palm) will define entrances. Platanus orientalis digitata (Cut Leaved Plane) shall be used throughout the outdoor carpark areas to create a lush canopy, provide shade and a strong green framework (final location of trees to be responsive to signage locations) The minimum criteria of 1 tree per 6 cap park spaces has been met.

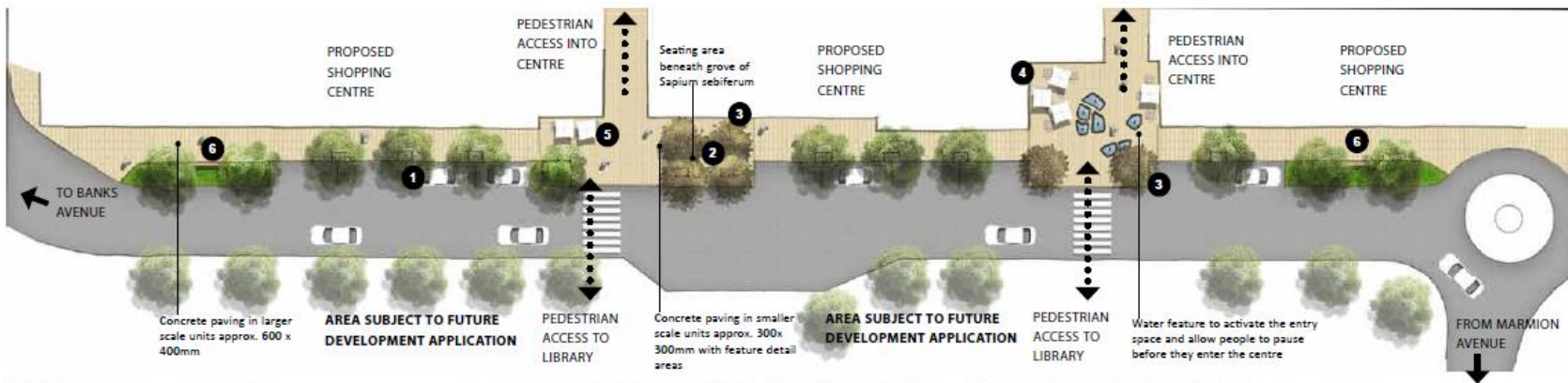
Plane trees will be continued to southern edge of site along Banks Avenue, with structured groundcovers to form a green base to the new building. Climber Ficus pumila (Creeping Fig) shall be used to create a 'green wall' where screens to the loading docks are proposed.

Along Whitford Avenue existing trees are to be retained and supplemented as required in collaboration with Council. The Marmion Avenue edge and corner is to be upgraded with new Washingtonia filifera (Cotton Palm) and shrub planting to enhance and frame the north-east corner of the building thus creating an informal entry statement.

**LEGEND**

1. Entry points defined by groupings of Canary Island Date Palms (5-6m trunks) combined with architectural planting, boulders and feature walling.
2. Feature walling plus signage to replace existing walls (see detail sheet). New planting to roundabout.
3. Plane trees (400L) used throughout the outdoor carpark areas to create a lush canopy, provide shade and a strong green framework. Final location of trees to be responsive to signage locations.
4. Plane trees (400L) continued to the southern edge of the site, with structured groundcovers to form a green base to the new building. Planting within car parks will be in accordance with City of Joondalup standard details STD 002-1 Rev 2 and STD 003-1 Rev1.
5. Plane Trees (400L) to Marmion Avenue edge
6. Cotton Palms (6m trunks) as feature tree to corner
7. Existing trees to be retained and supplemented as required in collaboration with Council.
8. Climbers (200mm pots) to form green wall to loading dock screens





**LEGEND**

1. Tuckeroo trees (800L) to form evergreen shade at a human scale.
2. Sculptural seating platforms combining timber, concrete and stainless steel to form organic multi functional elements.
3. Feature trees Sapium Sebiferum (800L) to entry areas
4. Food kiosks with associated seating
5. Paving to be a consistent, simple palette of materials used in different scales to create varying levels of intimacy and assist legibility.
6. Informal seating areas adjacent to planting beds. Planting beds within paved areas to be a mix of feature planting / boulders and groundcovers. Refer planting detail sheet.



DETAIL PLAN - MARMION AVENUE ENTRY



LEGEND

1. Tuckeroo trees (800L) arranged in organic groupings to form evergreen shade at a human scale.
2. Sculptural seating platforms combining timber, concrete and stainless steel to form multi functional elements.
3. Feature trees Sapium sebiferum (800L) within seating areas
4. Plane trees (400L) within car park
5. Planting beds within paved areas to be a mix of feature planting / boulders and groundcovers. Refer planting detail sheet.
6. Paving to be a consistent, simple palette of materials used in different scales to create varying levels of intimacy and assist legibility.
7. Water feature Water feature to activate the entry space and allow people to pause before they enter the centre
8. Creeping Fig climber (5L) to loading dock screens
9. Informal seating areas adjacent to planting beds
10. Planting in pots (45L) beneath colonade



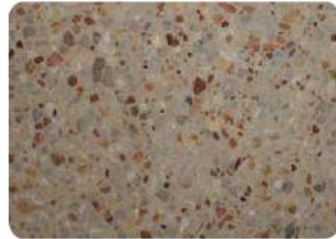
DETAIL PLAN - WHITFORD AVENUE ENTRY



The proposed planting and materiality for Whitford City is to portray a gradation from robust to a fine detail of texture, grain and form as you move through the four key transitional spaces.

The following imagery is indicative of the desired character of the precinct and is subject to further design development to confirm appropriateness and availability of exact species and materials to be used.

**PAVING**



WARM PAVING TONES USING NATURAL AGGRAGATES

**WATER**



ORGANIC, SCULPTURAL AND PLAYFUL

**STRUCTURES / WALLING**



FINER DETAIL TO RETAINING WALLS

**LIGHTING**



CONSIDERED LIGHTING TO SCULPTURAL WATER ELEMENTS



LINEAL PAVING TRANSITION



FINER GRAIN MATERIAL TRANSITION



REFLECTIVE AND ORGANIC



SIMPLE MESH CLADDING AND CLIMBERS



UPLIGHTING OF PALMS AND TREES



BREAKING DOWN THE GRAIN INTO MORE DETAILED PAVING UNITS



INTIMATE PAVED DETAIL AREAS



SCULPTURAL / INTERACTIVE



GREEN WALLS TO CARPARKING FACADES



SUBTLE INTIMATE LIGHTING TO THE EDGES

CHARACTER IMAGERY - **MATERIALS**

TREES AND CLIMBERS

ACCENT PLANTING

UNDERSTOREY

UNDERSTOREY



PHOENIX CANARIENSIS (CANARY ISLAND PALM). ARRIVAL ENTRY POINTS. 5-6M TRUNKS.



FICUS PUMILA (CREEPING FIG). CLIMBER 1 LOADING DOCK SCREENS AND BUILDING FACADES. 5L POT @ 300MM SPACING



RAPHIOLEPIS X DELACOURII(PINK INDIAN HAWTHORN). BUILDING EDGES. 45L POT.



GREVILLEA LANIGERA (MT. TAMBORITHA) 5L POT @ 6 /M2



RAPHIS EXCELSA PALM. 5L POTS @ 6/M2



WASHINGTONIA FILIFERA (COTTON PALM). TALL SLENDER PALM TO FEATURE AREAS. 6M TRUNKS.



CUPANIOPSIS ANACARDIOIDES (TUCKEROO) - SHADE TREE TO BUILDING EDGES. 800L POT.



CORDYLINE RUBRA FOR SPLASHES OF BOLD COLOUR AMONGST DENSER GARDENS. 45L POT



PHILODENDRON 'XANADU'. 5L POTS @ 6/M2



LOMANDRA 'LIME DEVINE' (LOMANDRA) 5L POTS @ 6/M



PLATANUS ORIENTALIS DIGITATA (CUTLEAF PLANE)- TRANSITIONAL STRUCTURE / SHADE TREE IN CAR PARK AREA AND TO PERIMETER. 400L POT.



SAPIUM SEBIFERUM (CHINESE TALLOW TREE). FEATURE TREE TO BUILDING EDGES. 800L POTS.



HARDENBERGIA COMPTONIANA - PENDULOUS FLOWERING CLIMBER - 45L POT.



WESTRINGIA FRUTICOSA 'WYNYABBIE GEM' (COASTAL ROSEMARY) 5L POTS @ 6/M2



DIANELLA 'LITTLE REV' (DIANELLA) 5L POTS @ 6/M

NOTE: PLANT SELECTION HAS BEEN MADE WITH REFERENCE TO THE CITY OF JOONDALUP 'INFORMATION SHEET ON APPROVED PLANT MATERIAL'

CHARACTER IMAGERY - PLANTING





## Form 1 - Responsible Authority Report (Regulation 12)

<b>Property Location:</b>	Lot 501 Whitfords Avenue, Hillarys
<b>Application Details:</b>	Shopping Centre - Proposed Major Expansion
<b>DAP Name:</b>	Metro North-West Joint Development Assessment Panel
<b>Applicant:</b>	Urbis
<b>Owner:</b>	Westfield Management Limited
<b>LG Reference:</b>	City of Joondalup
<b>Responsible Authority:</b>	Western Australian Planning Commission
<b>Authorising Officer:</b>	Acting Executive Director Perth and Peel Planning Division
<b>Department of Planning File No:</b>	DoP Ref 34-50060-3 and DAP Ref: DP/13/00578
<b>Report Date:</b>	2 September 2013
<b>Application Receipt Date:</b>	4 July 2013
<b>Application Process Days:</b>	80 days
<b>Attachment(s):</b>	1. Location Plan including MRS Zoning 2. Aerial Photograph 3. Development Plans (Site Plan/Floor Plan/Elevations - Drawings No.'s DA-04-07, DA-13-15) 4. Draft (Whitford) Activity Centre Structure Plan 5. Activity Centres Plan (North-West Sub-Region) 6. Indicative Staging Plan

### Recommendation:

That the Metro North-West JDAP resolves to:

**Refuse** DAP Application reference DP/13/00578 as shown in the accompanying plans date stamped 4 July 2013 and reference Project No. 11310 in accordance with Clause 30 (1) of the Metropolitan Region Scheme for the following reasons:

### Reasons

1. The proposed development is contrary to and would undermine the effective implementation of the Western Australian Planning Commission's *State Planning Policy 4.2 - Activity Centres for Perth and Peel*, the purpose and intent of which is to encourage the establishment of a functional hierarchy for activity centres as part of a long-term and integrated approach to the development of economic and social infrastructure.
2. The site of the proposed development forms part of a designated activity centre within *State Planning Policy 4.2 - Activity Centres for Perth and Peel* which requires comprehensive pre-planning prior to development, including broad land use, functionality, and urban design as well as the co-ordination of land

use and infrastructure, including staging and implementation. The proposed development, if approved, could prejudice the planning of the activity centre.

3. The proposed development will result in a reduction of the land use diversity of the site to 26.46%, significantly below the target of 40% within *State Planning Policy 4.2 - Activity Centres for Perth and Peel*. Approval of the proposed development prior to the adoption of the Activity Centre Structure Plan would prejudice the implementation and delivery of the diversity targets of *State Planning Policy 4.2*.
4. The proposed development does not address residential density targets in accordance with *State Planning Policy 4.2 - Activity Centres for Perth and Peel*. Approval of the proposed development prior to the adoption of the Activity Centre Structure Plan would prejudice the implementation and delivery of the residential targets specified within *State Planning Policy 4.2*.
5. The application has not adequately addressed the potential impacts of the proposed development to Marmion Road, Whitfords Avenue and the local road network.
6. The application has not adequately addressed the provision and suitability of on-site parking in accordance with the requirements of *State Planning Policy No. 4.2 - Activity Centres for Perth and Peel*.
7. The proposed development would prejudice the orderly and proper planning of the locality and preservation of the amenities of the area.

**Background:**

Property Address:	Lot 501 Whitfords Avenue, Hillarys
Zoning	MRS: Urban
	TPS: Commercial
Use Class:	Shops and Department Store
Strategy Policy:	State Planning Policy No. 42 - Activity Centres for Perth and Peel
Development Scheme:	District Planning Scheme No. 2
Lot Size:	19.78 hectares
Existing Land Use:	Shopping Centre
Value of Development:	\$192.2 million

The subject site is located at the corner of Marmion Avenue and Whitfords Avenue, Hillarys and accommodates a shopping centre known as Westfield Whitford City (Whitford shopping centre) (**Attachment 1 and 2**). It is identified as a Secondary Centre within *State Planning Policy 4.2 - Activity Centres for Perth and Peel* (SPP 4.2) and currently provides 49,990m<sup>2</sup> of retail floor space, with a total commercial floor space of approximately 79,000m<sup>2</sup>.

In 1997, an application to expand the centre to approximately 72,000m<sup>2</sup> retail floor space, and a total of 91,000m<sup>2</sup> commercial floor space was refused by the City of Joondalup (the City) and the Western Australian Planning Commission (the Commission) on the basis of unacceptable impacts associated with traffic and amenity. The proposal was dismissed on appeal for the same reasons. In 1999 and 2000, an application for approximately 49,000m<sup>2</sup> retail and 70,000m<sup>2</sup> commercial

floor space was approved by the City and the Commission, which generally represents the current development on the site.

This development application proposes upgrades and expansion works within the eastern portion of the site, resulting in a 31,461m<sup>2</sup> retail floor space extension to the Whitford shopping centre at an approximate cost of \$192.2 million.

Pursuant to Clause 32 Resolution 2011/01 of the Metropolitan Region Scheme (MRS), an application for major development at a Secondary Centre is required to be referred to the Commission for determination. Under SPP 4.2, the application represents major development which is defined as:-

*“development of any building where the building is used or proposed to be used for shop retail purposes and where the shop-retail net lettable area of the proposed building is more than 10 000m<sup>2</sup>; or*

*development of any extension/s to an existing building where the extension/s is used or proposed to be used for shop-retail purposes and where the shop-retail net lettable area of the extension/s is more than 5000m<sup>2</sup>” .*

The Clause 32 resolution does not obviate the need to also obtain approval under the local planning scheme, necessitating a dual reporting process whereby the City and the Commission are required to submit independent “responsible authority reports” for consideration by the Joint Development Assessment Panel (JDAP).

## **Details**

The development application seeks approval to undertake a major retail expansion of the existing shopping centre with an additional 31,461m<sup>2</sup> retail floor area proposed, comprising:

- Relocation of the (existing Coles) supermarket of 4,400m<sup>2</sup>;
- An additional, smaller supermarket;
- The addition of a double-level, 12,000m<sup>2</sup> (David Jones) Department Store;
- Relocation of the (existing Big W Discount) 8,000m<sup>2</sup> Department Store;
- An additional four mini-majors and 70 specialty stores;
- A new externally orientated retail space on the eastern edge of the centre;
- New facade treatments;
- End of trip facilities including 75 bike lockers and belongings lockers; and
- An additional 562 car bays almost entirely within basement or rooftops car parks (**Attachment 3**).

## **Legislation & policy:**

### Legislation

*Planning and Development Act 2005*

*Metropolitan Region Scheme 1963*

### Strategic Policy

*Directions 2031 and Beyond Spatial Framework for Perth and Peel*

## State Planning Policy

*State Planning Policy 1 - State Planning Framework*

*State Planning Policy 4.2 - Activity Centres for Perth and Peel*

### **Consultation:**

The proposal was advertised under the City of Joondalup's District Planning Scheme No. 2 (DPS No. 2) for 21 days from 23 July 2013 to 15 August 2013 with letters sent to surrounding landowners and relevant external authorities and agencies, signs placed on the site, an advertisement in the newspaper, and a notice on the City's website.

### Public Consultation

A total of 319 submissions were received, comprised of 47 letters of support/non-objection, 20 neutral submission, and 246 letters of objection. Of the objection letters received, 224 were proforma submissions and of the neutral submissions received, 17 were proforma submissions.

The submissions raised the following key points:

- the inappropriate scale of the proposed development in the absence of an approved structure plan;
- increased traffic and associated congestion in the surrounding road network;
- lack of parking, particularly as the number of additional bays proposed is not akin to the percentage increase of the proposed expansion;
- increased noise due to additional deliveries and customers;
- decreased property values due to the appearance of the shopping centre; and,
- loss of amenity.

### Consultation with other Agencies

Four submissions were received from government agencies, being the Water Corporation, Public Transport Authority (PTA), Department of Transport, and Main Roads Western Australia (MRWA).

With exception of MRWA providing non-support for the left-in only access to the subject site from Marmion Avenue, the agencies provided condition support or non-objection for the proposal.

The matters raised in both the public and agency submissions will be addressed in the proceeding sections of the report.

### **Planning assessment**

#### Metropolitan Region Scheme (MRS)

The subject land is zoned 'Urban' under the MRS wherein a range of activities may be undertaken.

Clause 30 (1) of the MRS sets out the following factors when determining a development application:

- the purpose for which the land is zoned or reserved under the MRS;
- the orderly and proper planning of the locality; and
- the preservation of the amenities of the locality.

Although consistent with the purpose for which the land is zoned under the MRS, the development application for the major expansion of the shopping centre precedes the finalisation of an activity centre structure plan for the area which would compromise the orderly and proper planning and preservation of the amenities of the locality as discussed in the proceeding section of the report.

#### City of Joondalup District Planning Scheme No. 2

The subject land is currently zoned 'Commercial' under the City of Joondalup DPS No. 2. The proposed 'Shop' and 'Department Store' uses are 'P' (permitted) and 'D' (discretionary) uses under DPS No. 2. However, Clause 3.7.2 of the DPS No. 2 states that any major development within specified activity centres, including Whitford, shall not be approved unless an activity centre structure plan has been prepared and approved in accordance with the requirements of SPP 4.2.

The site is currently subject to Amendment 68 which seeks to define the broader area intended to be subject of the draft Activity Centre Structure Plan (ACSP), as agreed by the applicant, City and Department of Planning, to a 'Centre' zoning. Amendment 68 has been advertised however is yet to be determined by the City and forwarded to the Commission for its determination.

Notwithstanding, the Centre zoning applicable to the draft ACSP is considered imminent. Upon finalisation, this zoning will provide the statutory basis for the implementation of an activity centre structure plan for the whole activity centre area ahead of further subdivision and development, in accordance with SPP 4.2. Approval of the proposed development application prior to the endorsement of the draft ACSP would be inconsistent with the existing provisions within DPS No. 2 and Amendment 68.

#### State Planning Policy 4.2 - Activity Centres for Perth and Peel (SPP 4.2)

SPP 4.2 provides broad requirements for the planning and development of activity centres in Perth and Peel, and outlines the distribution, function, movement, land use and urban design criteria relevant to activity centres. The policy applies to the preparation and review of local planning strategies, schemes, structure plans and development control.

The Whitford Shopping Centre is identified as a Secondary Centre within SPP 4.2. Clause 6.4 of SPP 4.2 relevantly states:

*"Activity centre structure plans need to be prepared for strategic metropolitan, secondary, district and specialised centres..."*

This clause further states that:

*"Activity centre structure plans should be endorsed prior to a major development being approved to ensure a centre's development is integrated, cohesive and accessible. In exceptional circumstances (in the absence of an endorsed activity centre structure plan), any major development must satisfy relevant requirements of the Model Centre Framework".*

The applicant submitted an Activity Centre Structure Plan (ACSP) to the City of Joondalup in November 2012 (**Attachment 4**).

A number of issues were identified in preliminary assessments of the draft ACSP undertaken by the City and the Commission, many of which are yet to be resolved. Notwithstanding this, the City granted consent to advertise the draft ACSP in March 2013 in the interest of obtaining public comment on the proposal. The consultation period commenced in mid-May 2013 and concluded in mid-July 2013. To date, the City has not determined the draft ACSP and the document has not been referred to the Commission for its assessment and determination.

SPP 4.2 provides for the consideration of major development applications prior to the endorsement of an activity centre structure plan in exceptional circumstances only, and subject to the development satisfying the relevant requirements of the Model Centre Framework.

The applicant has provided the following justification in relation to exceptional circumstances:

- *The desire to attract a national department store (David Jones) to complement the centre's role and function which will only occur if the development is approved prior to 31 October 2013 (prior to the structure plan being finalised); and*
- *A relevant structure plan, the draft ACSP, is being progressed in consultation with the local government and WA Planning Commission, such that it can be treated as a seriously entertained planning proposal.*

These reasons are not supported as:

- the desire to attract a national department store is a private business arrangement which is not a valid planning consideration; and
- there are a significant number of outstanding issues in relation to the draft ACSP.

Whilst the City and the Department of Planning (the Department), on behalf of the Commission have been working in consultation with the applicant on the draft ACSP, the City and the Department have advised the applicant of a number of significant concerns with the draft ACSP which remain outstanding. Some of the outstanding including:

- agreement on the extent of retail floor area based on the Retail Sustainability Assessment (RSA),
- the accuracy of the traffic assessment,
- parking management,

- public transport improvements,
- appropriate land use diversity,
- increased residential density,
- certainty surrounding staging and implementation, and
- allocation of infrastructure costs.

The outstanding matters are significant and the approval of any major development in the draft ACSP area prior to the resolution of these issues through the structure planning process is likely to compromise the ability to achieve the planning objectives for activity centres envisaged by SPP 4.2. The structure plan process is the appropriate planning mechanism through which matters such as these should be resolved, and the consideration of major development in the structure plan area prior to the determination of the draft ACSP is considered to be premature.

Should the JDAP be of the view that the applicant has satisfactorily demonstrated exceptional circumstances, SPP 4.2 requires that the proposed development also satisfy the relevant requirements of the Model Centre Framework (MCF). In this regard, an assessment of the application in accordance with the MCF is provided below.

#### Model Centre Framework (MCF)

The aim of the MCF is to provide guidance on the preparation of activity centre structure plans, and support SPP 4.2. Activity centre structure plans, or major developments in the absence of an endorsed structure plan, are to have regard for the key considerations of the MCF, which are itemised within SPP 4.2. For purposes of brevity, only the most critical, outstanding, non-compliant items of the proposed development are addressed below.

##### *Regional (Centre) Context:*

- Statutory Framework

The development proposal acknowledges all of the applicable state policies, strategies and guidelines, however it fails to adhere to and implement a number of key objectives. These will be explained in the relevant proceeding sections of the report.

- Centre Hierarchy

The activity centre hierarchy endeavours to distribute activity centres to meet different levels of community need and enable employment, goods and services to be accessed efficiently and equitably by the community. It is considered that the expansion of Whitford shopping centre to the extent proposed by the application does not meet with the expectations of the functional hierarchy in this regard, and is premature and possibly unnecessary, given the north-west sub-region is expected to accommodate a number of proposed and emerging activity centres in the medium to long term. These include a Strategic Metropolitan Centre at Yanchep, secondary activity centres at Alkimos and Two Rocks and a district centre at Eglinton (**Attachment 5**).

## *Retail*

SPP 4.2 requires major development proposals to include a Retail Sustainability Assessment (RSA), in order to determine the estimated retail need in the locality and the potential impacts of the proposal on other (existing or planned) activity centres. The applicant submitted an RSA with the proposal which asserts that the proposed 31.461m<sup>2</sup> of additional retail floor space is justified for the following reasons:

- there is currently an undersupply of floor area in the north-west sub-region trade area, and more specifically, within the main trade area (being the area bound by the Mitchell Freeway, Reid Highway, Beach Road and the coast);
- the main trade area will experience increased population growth and real growth in retail spending which will increase demand and market capacity at Whitford and other centres in the region;
- there is currently a high level of 'escape' expenditure from the north-west sub-region (residents spend their money outside the region) which is largely attributed to the undersupply of higher order retailing;
- the proposed expansion of the Whitford centre would offer a reasonable level of competition to other centres, including Joondalup, which is a higher order (Strategic Metropolitan) centre, which is located in the same local government area as Whitford shopping centre; and,
- Joondalup will retain its viability and primacy as the Strategic Metropolitan Centre given its retail floor space of approximately 100,000m<sup>2</sup> retail floor area and other surrounding uses and services including a hospital, university, civic buildings and existing apartment buildings.

The RSA relies on Whitford shopping centre receiving an additional \$190 million dollars expenditure per annum to support the new floor space proposed. This new expenditure is assumed largely to be sourced from recapturing current 'escape' expenditure, increased population growth (estimated at a conservative 0.4 per cent per annum), increased individual expenditure and increased market share. The potential to achieve all of these factors is highly uncertain and all of these markets are contestable. Additionally, the estimated 0.4 per cent growth is marginal and unlikely to result in a significant increase in retail demand.

The anticipated increased expenditure and the continuation of favourable economic circumstances within the north-west sub-region is therefore dependent upon:

- increased consumption consistently above inflation, which is highly uncertain in the short to medium term;
- increasing market share for Whitford shopping centre and continuing support for the centre from outside the main trade area despite emerging centres and additional floor space coming on line in the north-west sub-region to cater for the anticipated high population growth in the more northern part of the region; and
- minimal response from the other competing centres.



Based on the above, the expansion of Whitford shopping centre to the extent sought is predicated by the continuation of optimistic outcomes across all of the critical factors. This is unrealistic, not only for the Whitford shopping centre but the other centres in proximity and within the north-west sub-region. Without this ideal yet uncertain high growth scenario, Whitford shopping centre will struggle to achieve its projected trade and the impact on other centres will be greater than already presumed.

The proposed development is therefore likely to undermine the functional hierarchy established under SPP 4.2, be of detriment to the lower order centres in the main trade area including five existing or proposed district activity centres and more than thirty neighbourhood centres, and adversely impact on the ability of surrounding higher and lower order centres to service their catchments as envisaged by SPP 4.2.

The City of Joondalup has prepared a draft Commercial Strategy which concludes that expansion beyond what is currently existing at Whitford shopping centre (approximately 50,000m<sup>2</sup>) should not be supported prior to 2026. As the draft Commercial Strategy is yet to be finalised, the City has had an independent economic consultant (RPS) review the RSA submitted with the draft ACSP.

RPS have indicated that the RSA provided has a flawed methodology particularly with regard to the trade area and growth assumptions, as the justification is based on the need for greater floor space in north-west sub-region rather than the trade area or secondary trade area. As such, the RSA does not adequately justify the proposed retail expansion and instead, raises concerns regarding the ability for Whitford shopping centre to support the additional floor space proposed.

In addition, Lakeside Joondalup has provided a submission on the proposed increase in floor area at the Whitford shopping centre and provided an analysis by an economic consultation (Location IQ), which outlines that the methodology provided in the Urbis is not sound, and the proposed expansion of Whitford shopping centre to the size sought by the application will impact on surrounding centres. This impact will have particular effect on the Joondalup Strategic Metropolitan Centre and inhibit its ability to expand over a period of time and provide the anticipated level of service expected.

The Department's assessment of the RSA aligns closely with that undertaken by RSA and Location IQ on behalf of the City of Joondalup and Lakeside Joondalup respectively. Fundamentally, the RSA does not provide clear or solid justification for the extent of expansion sought by the application, however, it is clear that there is scope for some increase at the Whitford shopping centre. Based on the consideration of all the factors discussed thus far in the report, the Department is of the opinion that an approximate additional 10,000m<sup>2</sup> additional shop-retail floor space that could be supported in the Whitford shopping centre in the short term (up to 2021) without undermining the functional hierarchy as per SPP 4.2.

#### *Movement and Access*

- Regional Perspective - Strategic Road Hierarchy

The subject site is located at the corner of Marmion Avenue and Whitfords Avenue, which are identified as 'Primary Regional Road' and 'Other Regional Road' respectively under the MRS.

Marmion Avenue is under the control of MRWA who has advised that the proposed new 'left-in only' access to the site from Marmion Avenue is not supported. The Transport Assessment provided with the proposal has been compiled on the assumption that the left-in access point will be implemented. In the absence of MRWA support for this access arrangement, there will be greater traffic implications for the two nearest west-turning access points, being Banks Avenue and Whitfords Avenue.

The applicant has advised that MRWA has previously supported the left-in only access under previous approvals however it was never completed. In addition, the applicant advises that the level of traffic forecast to use the proposed left-in only access is relatively minor and if the access were not constructed, the traffic redistribution to other access points will not have a significant effect on intersections or roads. However, as this altered network is not catered for in the Transport Assessment, the impacts to Marmion Road, Whitfords Avenue and the local road network remain unresolved.

- Traffic Volumes

The Traffic Assessment submitted with the development application utilises conservative traffic generation figures which do not appear to be consistent with the scale of the proposed development. The proposed expansion represents an increase in retail floor area of approximately 60%, whereas the proposed increase in traffic is only approximately 23%. In addition, both MRWA and the Department of Planning have raised concerns regarding the background growth rates that have been utilised in the analysis.

In response to these concerns, the applicant has advised that the Traffic Assessment for the development is robust in that it has not assumed a mode shift away from cars, or accounted for trip-chaining. Notwithstanding this, the Department is of the view that the traffic generation figures estimated in the report are lower than what is likely, however the short timeframes associated with the assessment of this application have not allowed for further scrutiny or dialogue with the applicant to resolve this issue.

The traffic generation figures and the Traffic Assessment in general, remain an area of concern, particularly in view of the non-support by MRWA for the left-in access from Marmion Avenue.

Both MRWA and the Department have expressed concern with the discrepancies between the Traffic Report provided with the draft ACSP and the development application. Ideally, the Traffic Report associated with the draft ACSP would be modified, including (regional) remodelling, to meet the requirements of MRWA and the Department prior to the consideration of this application and its Traffic Assessment in isolation of the draft ACSP.

Confirmation and agreement with regard to traffic volumes and associated traffic impacts is a matter that is still outstanding with regard to the draft ACSP and the development application.

- Points of Arrival

The corner of Marmion Avenue and Whitfords Avenue, being the junction of two regional roads which surround the site, is considered to be the most prominent 'point of arrival' within the draft ACSP area and is identified as a 'landmark site' under the draft document. The development application is not consistent with the draft ACSP in this regard as it does not include a 'landmark' site or feature at this corner as part of this application.

The development that is proposed to be constructed closest to the corner of Marmion and Whitfords Avenue is a building (supermarket) set back approximately 25 metres from the intersection. Notwithstanding that it is proposed to incorporate feature and planting blades within the building design, the building will dominate this prominent point of arrival. The absence of a designated landmark feature and the reliance on the design of the building, being 9 metre high walls with 15 metre high blades, is not considered to be an adequate and distinguishing point of arrival solution. Additionally the building will create inactive frontages including loading bays, screened by 6.0 metre high walls fronting Whitfords Avenue.

In relation to pedestrian arrival, the application states that a colonnade will be constructed to provide a fully sheltered footway between the bus stop and the main entrance closest to the Whitfords Avenue bus stop. The submitted plans do not, however, depict these works as part of this application.

- Public Transport

Whitford Activity Centre is currently serviced by two bus routes however neither of these routes currently meet the definition of 'high frequency' or a 'quality transit system' as predicated by SPP 4.2 for a Secondary Centre.

The proposal is reliant on the shopping centre expansion causing an increase in the number of public transport users to justify the provision of increased bus services to the centre. However there is no specific commitment from the PTA in relation to increased services, rather, the PTA have advised that they may be prepared to reconsider routes, dependent on future frontage activation and resultant increased patronage.

SPP 4.2 requires activity centres to provide sufficient development intensity and land use mix to support high frequency public transport. The draft ACSP acknowledges that a mix of uses in the structure plan area, particularly residential and office developments, will provide an opportunity to promote public transport modes. Whilst the proposal will increase the retail intensity of the site with an estimated additional 1500 jobs, this is not the scope of intensity or mix of uses envisaged by the policy. On this basis, the proposal is not likely to deliver the public transport demand and enhanced public transport environment envisaged by SPP 4.2.

Notwithstanding the lack of commitment from the PTA in relation to service provision changes and associated timeframes, the applicant has outlined a willingness to improve pathways between the bus stops and major entrances of the centre. There is no commitment to bus stop upgrades albeit acknowledging that PTA approval is required prior to any works.

This matter of public transport provisions and improvements to the activity centre remains outstanding with regard to the draft ACSP.

- Parking

The development proposes an increase of 562 parking bays on Lot 501 Whitfords Avenue to provide a total of 4,317 parking bays on the subject site. A number of these bays also service the other 'non-shop-retail' uses on the site, and as such, the parking proposed on Lot 501 will result in an approximate rate of 4.4 parking spaces per 100m<sup>2</sup> of shop-retail floor area. SPP 4.2 recommends a rate of 4-5 bays per 100m<sup>2</sup> of shop-retail floor area of which the proposed rate on the subject site is at the lower end of this range.

The proposed parking rate is concerning given the assumed car dependence in the short to medium term in the absence of improved public transport arrangements and the current low residential density achieved in the walkable catchment of the draft ACSP area. This could result in a parking bay shortfall until such time as the additional bays are provided on the site as part of any future stages, modal shift occurs, or residential density is increased in the surrounding areas. In the interim, a parking bay shortage is anticipated which will have flow-on impacts for the internal and external traffic network.

A parking bay cap of 4,200 bays is proposed within the 'Retail Precinct' (as defined by the draft ACSP), which is generally supported. The cap acknowledges that reduced parking standards can be supported on the basis of modal shift (increased public transport, cycling and walking), trip-chaining, reciprocal parking benefits and improved parking management. In the absence of resolution, commitment and certainty to a number of these parking related matters within the draft ACSP, it is considered that a significant retail extension to the centre under a single, upfront application is likely to jeopardise the successful implementation of the parking cap.

Subject to the parking matters being satisfactorily addressed through the draft ACSP, the ongoing management of these matters could be addressed through a Parking Management Plan for the site. While a Parking Management Plan has not been submitted with the application, the applicant acknowledges that this plan is required.

- Priority Access

The proposal demonstrates an appropriate number of disabled parking bays and 'parents with prams' parking bays, however the plans do not depict taxi rank locations. The applicant has indicated they are willing to accept a condition relating to this matter in the event of an approval.

- Freight

SPP 4.2 promotes fewer and safer points of conflict between vehicles and pedestrians and the draft ACSP states that service vehicle access routes and locations should be located away from areas of high pedestrian footfall and designed with consideration for safety, visual and acoustic amenity.

The proposed expansion includes four 'unloading' locations (loading docks) around the eastern portion of the site, of which three are new. The two loading docks to the north of the site will share space that has been designated as internal road cycle lane

and will be in close proximity of designated internal (pedestrian) circulation areas. Whilst efforts have been made to ensure that the loading docks are significantly screened from public view, the sweep paths provided by the applicant demonstrate that the constrained nature of the docks will have implications on manoeuvrability of standard-sized freight vehicles (of 19 metres) and limit their ability to exit from the loading area (easily) in forward gear.

Furthermore, as vehicles utilising the loading docks associated with the department store and supermarket will experience difficulty with access and egress, this will cause queuing of both other freight vehicles and patron vehicles on the site. This is of particular concern with regard to the northern dock where it would be unacceptable for vehicles to queue as far back as the Whitfords Avenue roundabout, as this would result in significant safety and efficiency concerns with regard to this regional road.

The lack of clarity and certainty with regard to the realistic functionality of these areas raises safety concerns for both freight drivers and the general public (drivers and pedestrians) and does not align with the draft ACSP.

Many submissions conveyed personal experiences of non-compliant and excessive noise emanating from the site, particularly with regard to delivery trucks and unloading areas. There are concerns that this situation is likely to be exacerbated by the additional loading dock that is proposed to the south of the site adjoining the Discount Department Store.

The acoustic report provided with the application demonstrates that the proposed development can implement a number of attenuation measures and practices whereby the site can achieve compliance with the *Environmental Protection (Noise) Regulations 1997* at all times. Therefore, compliance with these Regulations will be an ongoing management issue for Westfield, and monitoring role for the City.

#### *Activity*

- Land Use Diversity

SPP 4.2 outlines that for Secondary Centres with 50,000 - 100,000m<sup>2</sup> shop-retail floor area, a minimum of 40% of the total centre's floor space should be provided for a 'mix of land uses'. The shopping centre currently has a diversity performance rate of 35.2%. Under an assumption that all of the additional 31,461m<sup>2</sup> proposed under this application is allocated for retail purposes, the diversity performance rate will reduce to 26.46% as a result of the proposed development application.

It is likely that some of the additional floor area within the expansion will be allocated for entertainment or commercial purposes, and on this basis, the diversity performance rate of 26% is likely to be improved. The inclusion of the land uses within the draft ACSP which lie outside of the shopping centre site such as the civic and educational uses, will also improve the diversity performance rate within the structure plan area.

However, until the draft ACSP is finalised, there is no mechanism to ensure that diversity targets will be achieved. Approval of the proposed development prior to the adoption of the draft ACSP would prejudice the implementation and delivery of these diversity targets of SPP 4.2.

- Residential Development

Clause 5.2.2 (2) of SPP 4.2 states *'higher density housing should be incorporated within and adjacent to activity centres'*. The policy identifies a minimum density target of 25 dwellings per gross hectare for Secondary Centres, with a desirable target of 35 dwellings per gross hectare. The activity centre currently achieves a density of approximately 11 dwellings per gross hectare and the proposed development does not include any residential development or increase in residential density.

It is acknowledged that the constraints associated with brownfield sites represent a barrier to the implementation of the targets within SPP 4.2. Recent (and approved) activity centre structure plans in the north-west corridor have linked dwelling provision with stages and/or floor area in order to achieve adequate residential density over time. It is acknowledged that these structure plans have typically been greenfields sites, or less constrained than the Whitford shopping centre site. On this basis, a performance based approach should be taken in considering this issue as part of the draft ACSP.

The draft City of Joondalup Local Housing Strategy proposes future amendments to DPS No. 2 to upcode densities in the walkable catchment area in the medium-term. This will assist with the achievement of this residential target as per SPP 4.2. However, a significant proportion of the dwellings will need to be provided for within the draft ACSP area if this target is to be achieved, and includes the identification of residential development within Westfield's land. This issue, including any requirements for a staging plan linking increased floor space with increased densities, is still to be resolved through the structure plan. Approval of the proposed development prior to the structure plan being finalised would prejudice the implementation and delivery of the residential targets specified within SPP 4.2.

- Street Interface

The proposed expansion of the shopping centre will create a portion of active frontage along 'Marmion Promenade' (eastern elevation) which is an improvement to the existing situation at the centre, however there are still large portions of the facades which remain inactive. For example, there are expanses of inactive frontage of approximately 80 metres in length either side of the active portion along Marmion Promenade, and on the northern elevation to the supermarket and loading dock.

The application proposes to extend the centre further south towards Bank Avenue. The new portion of the centre along this frontage is proposed to accommodate the Discount Department Store and a new (screened) loading dock at ground level, with basement parking beneath and a rooftop carpark above. The portion of the building intended for the Department Store is proposed to be increased from one to two storeys, also with basement parking beneath and roof top parking above.

The substantial horizontal and vertical expansion of the centre along the Banks Avenue frontage lack design variation and articulation, increasing the visual impact and bulk of the centre along the Banks Street elevation. It is considered that this part of the proposed expansion will result in a reduced level of visual amenity for the lots on the southern side of Banks Avenue.

The development does not offer the level of activation and attractiveness anticipated by SPP 4.2 and it is considered that the deficiencies in regards to these aspects of

the design are largely due to the horizontal extent of the proposed expansion. This matter could be overcome by a reduction in proposed floor area or the relocation of some floor area vertically (to the second storey or level) in a more centralised location on the site.

- Public Spaces

Whilst the activation of Marmion Promenade will provide an improved 'public space' between the shopping centre and the adjacent library and senior citizens centre, the principal public space proposed within the draft ACSP is located in the 'Endeavour Precinct' to the west of the site and located within (indicative) Stages 3A and 3B. As previously discussed, due to the landholders leasing obligations these works are proposed to be undertaken as part of later stages which means there is no certainty, commitment or timeframes to indicate when this community space would be provided.

#### Staging, Implementation and Monitoring

The application states that *"this development is the first in what will be a series of applications and undertakings that will fulfil the vision outlined in the draft ACSP"* and iterates that Westfield is committed to the redevelopment of the site for medium density and mixed-use development (through its ownership in the Endeavour Precinct).

The issue of staging, implementation and monitoring is yet to be resolved as part of the draft ACSP. While the applicant has provided an indicative staging plan, this will need to form part of the adopted structure plan in order to provide an effective statutory mechanism for implementation. (**Attachment 6**)

Achieving the residential and diversity targets envisaged by SPP 4.2 is primarily dependent upon the redevelopment of the Endeavour Precinct within the draft ACSP. There is currently no certainty or mechanism, such as a staging plan, within the draft ACSP to address this issue.

Approval of the proposed development for a significant increase in the retail floor area prior to the resolution of these issue and the introduction of a statutory implementation mechanism as part of the ACSP would prejudice the implementation and delivery of the land use diversity and residential density targets of SPP 2.4, contrary to orderly and proper planning. The draft ACSP could, to a large extent, address this through the inclusion of staging provisions but this is one of the unresolved and outstanding matters that the draft ACSP is still required to address.

#### **Conclusion**

The proposal is contrary to the process and requirements outlined by SPP 4.2. An activity centre structure plan has not been endorsed for the site, a designated 'Secondary Centre' under SPP 4.2. Approval of the proposed development prior to the adoption of the draft ACSP would be inconsistent with SPP 4.2 and the City of Joondalup DPS No. 2.

Additionally, the development application does not comply with the requirements outlined by the Model Centre Framework of SPP 4.2. A number of significant matters remain unresolved, including traffic, parking, public transport, retail floor area need,

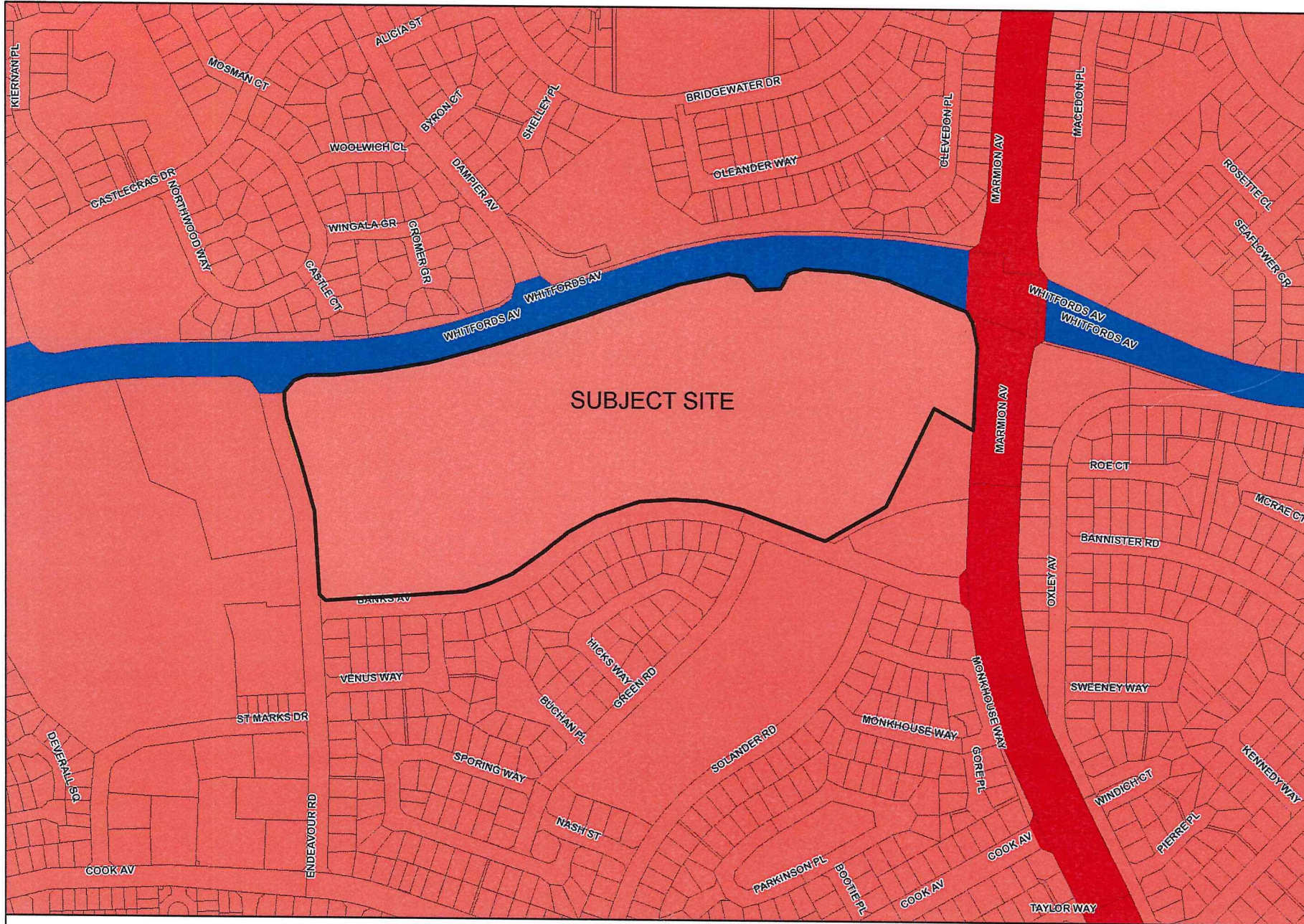
land use diversity, residential density, staging and implementation. A structure plan would provide a statutory framework which would ensure that these matters are appropriately addressed and that delivery of anticipated outcomes could be effectively implemented according to stages of development. In the absence of a structure plan there would be no mechanism to require any subsequent stages of development to deliver any of these outcomes.

The expansion of the Whitford shopping centre, as proposed, cannot be sustained in the short term and will undermine the functional hierarchy established under SPP 4.2. Specifically, the increased retail floor area and market share proposed at Whitford shopping centre is excessive and will have adverse impacts on the surrounding district and neighbourhood centres to the detriment of the community.

In the absence of committed public transport changes, and increased residential density in proximity of the draft ACSP area in the short to medium term, the proposed retail floor area will have adverse impact for the users of the centre, the local road network and the surrounding area.

Based on these factors, it is recommended that the development application for 'major development' expansion at the Whitford Shopping Centre be refused.





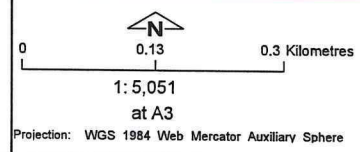
- Legend**
- Cadastre
  - W.A. Coastline
  - Road Names
  - MRS - Boundary
  - MRS - Ministerial Approval Requ
  - MRS - Redevelopment Scheme Act 1985
  - MRS - Redevelopment and Act A
  - MRS - Bush Forever
  - MRS - Water Catchments
  - MRS - Zones and Reserves**
  - central city area
  - civic and cultural
  - industrial
  - other regional roads
  - parks and recreation
  - parks and recreation restricted
  - port installations
  - pp - car park
  - pp - commonwealth government
  - pp - high school
  - pp - hospital
  - pp - prison
  - pp - special uses
  - pp - State Energy Commission
  - pp - technical school
  - pp - university
  - pp - Water Authority of WA
  - primary regional roads
  - private recreation
  - public purposes
  - railways
  - rural - water protection
  - rural
  - special industrial
  - state forests
  - urban
  - urban deferred
  - waterways

**Notes:**  
The data that appears on the map is out of date, not intended to be used as scale displayed, or subject to agreements. This information is the relevant layers metadata. For reasons the map should not be distributed outside of the Department.

# Location Plan including MRS Zoning

**INTERNAL USE ONLY**

Internal Spatial Viewer  
[Link to website](#)



Produced by: FUNCTIONALITY TO  
Date produced: 04-Sep-

**Legend**

- Cadastre
- W.A. Coastline
- Road Names




**SUBJECT SITE**

# Aerial Photograph

**INTERNAL USE ONLY**

Internal Spatial Viewer  
[Link to website](#)

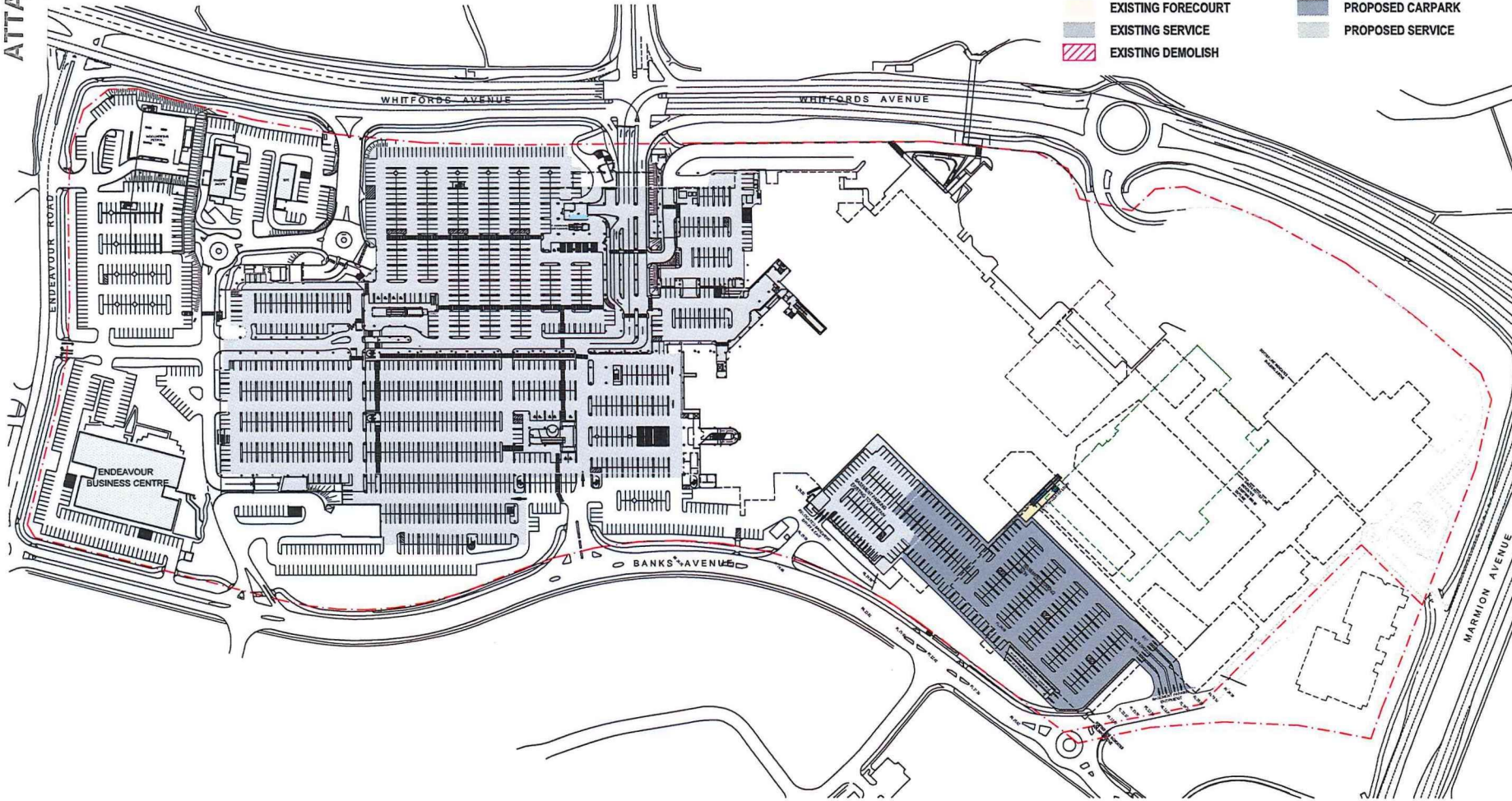
  
 0 0.09 0.2 Kilometres

**1: 3,618**  
**at A3**  
 Projection: WGS 1984 Web Mercator Auxiliary Sphere

**Notes:**

The data that appears on the map is out of date, not intended to be used at scale displayed, or subject to agreements. This information is for the relevant layers metadata. For reasons the map should not be distributed outside of the Department.

Produced by: FUNCTIONALITY TO  
Date produced: 04-Sep-



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PROPOSED BASEMENT LEVEL  
SCALE 1:1000@B1

DEVELOPMENT APPLICATION

**PROPOSED BASEMENT LEVEL  
WHITFORD CITY**

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, B/L's, survey and details

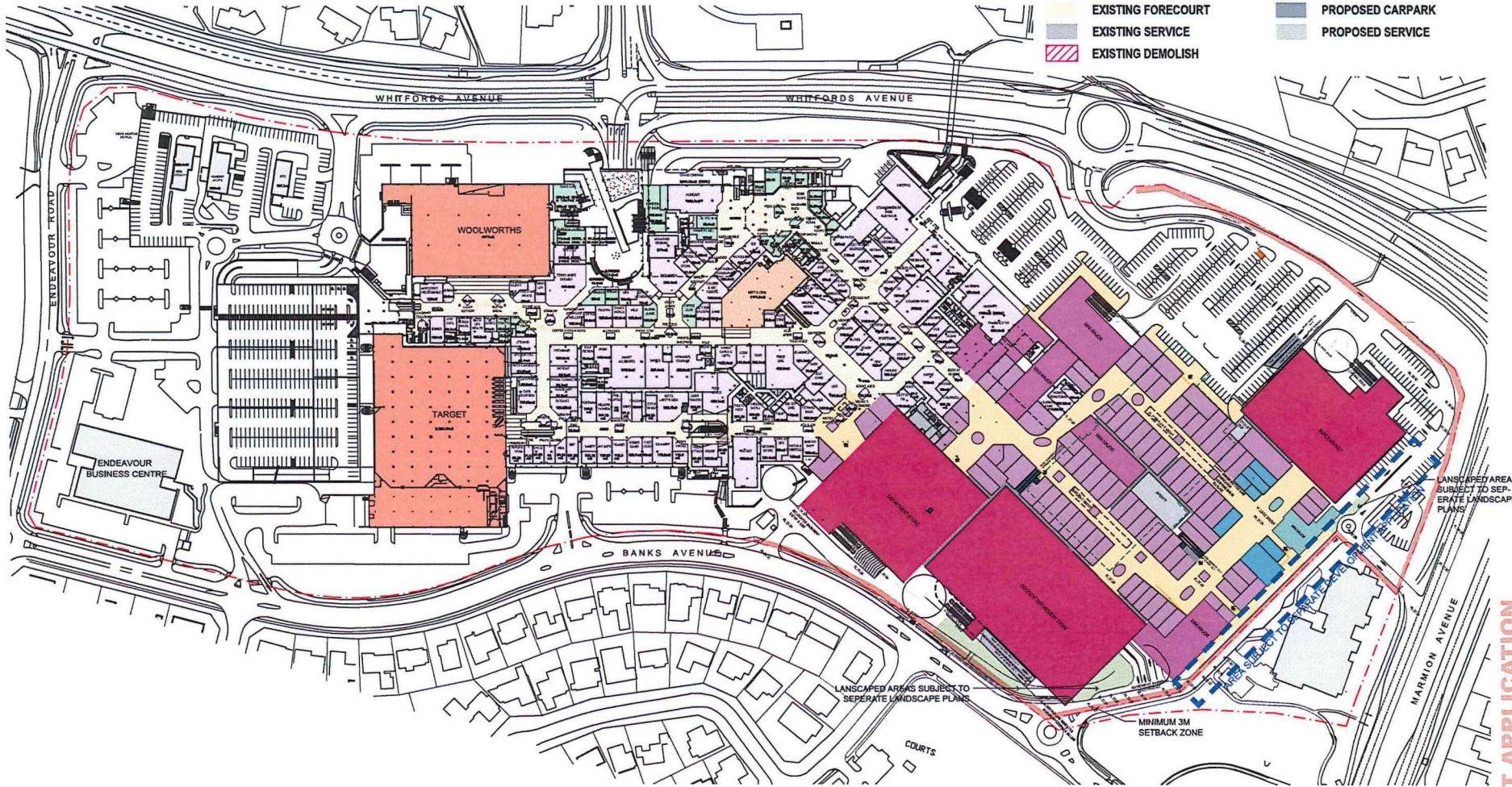


Scale 1:1000	Project No. 11310
	Date JULY 2013
Drawing no. DA-04	Revision A



LEGEND

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|  EXISTING MINI-MAJOR         |  PROPOSED MINI-MAJOR         |
|  EXISTING SPECIALTY & KIOSK  |  PROPOSED SPECIALTY & KIOSK  |
|  EXISTING CINEMA             |  PROPOSED CINEMA             |
|  EXISTING MALL               |  PROPOSED MALL               |
|  EXISTING FOOD               |  PROPOSED FOOD               |
|  EXISTING VERTICAL TRANSPORT |  PROPOSED DINING             |
|  EXISTING CARPARK            |  PROPOSED VERTICAL TRANSPORT |
|  EXISTING FORECOURT          |  PROPOSED CARPARK            |
|  EXISTING SERVICE            |  PROPOSED SERVICE            |
|  EXISTING DEMOLISH           |   |



PROPOSED LEVEL 1  
SCALE 1:1000@B1

DEVELOPMENT APPLICATION

PROPOSED LEVEL 1  
WHITFORD CITY

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, RLs, survey and details

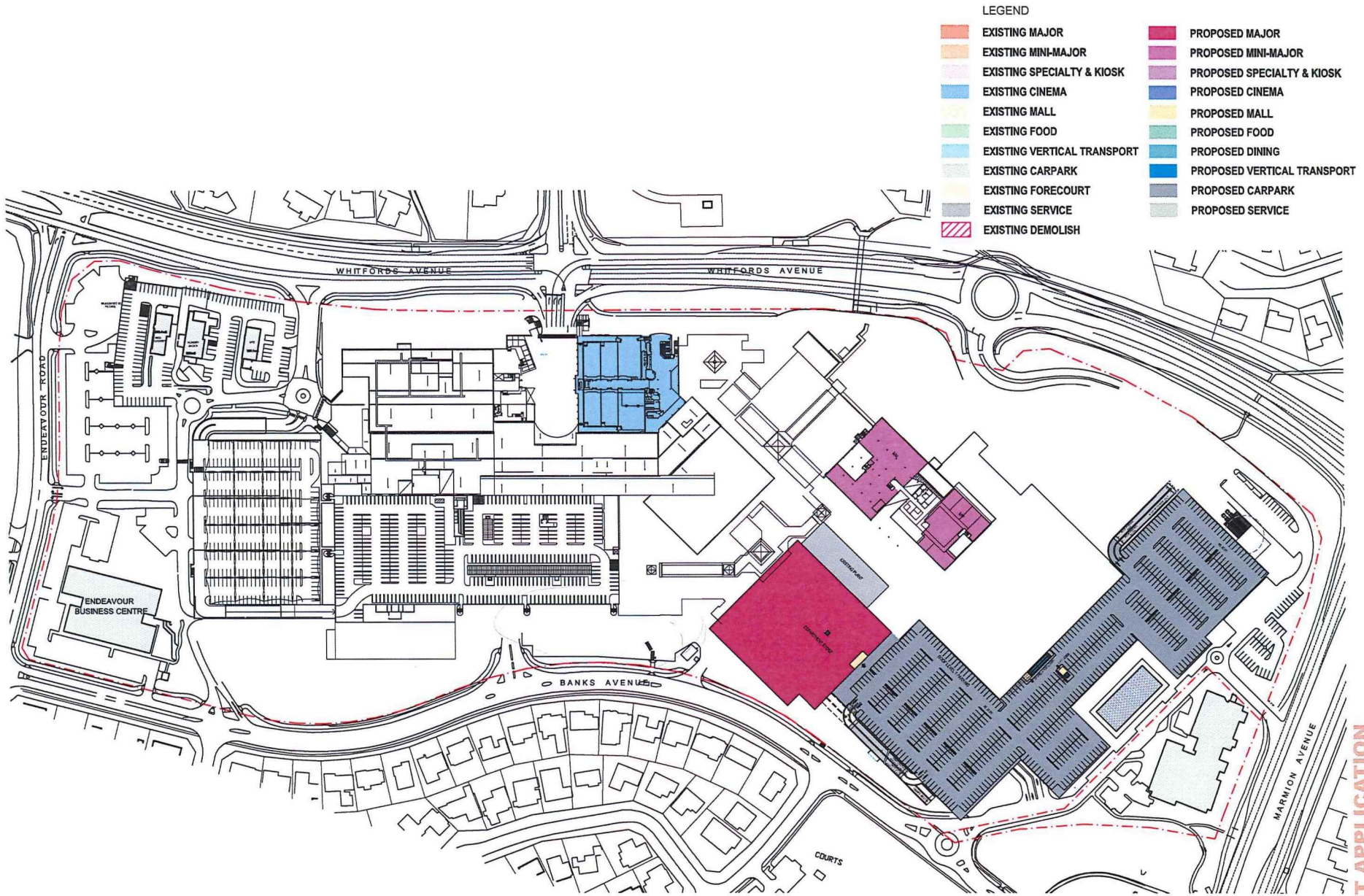
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Westfield Design & Construction Pty Ltd

**Westfield**  
RETAIL TRUST

**GIC**

Scale 1:1000	Project No. 11310
	Date JULY 2013
Drawing no. DA-05	Revision A





**PROPOSED LEVEL 2 / ROOF LEVEL 1**  
**SCALE 1:1000@B1**

**PROPOSED LEVEL 2 / ROOF LEVEL 1**  
**WHITFORD CITY**

**DEVELOPMENT APPLICATION**

Notes:  
 \* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details

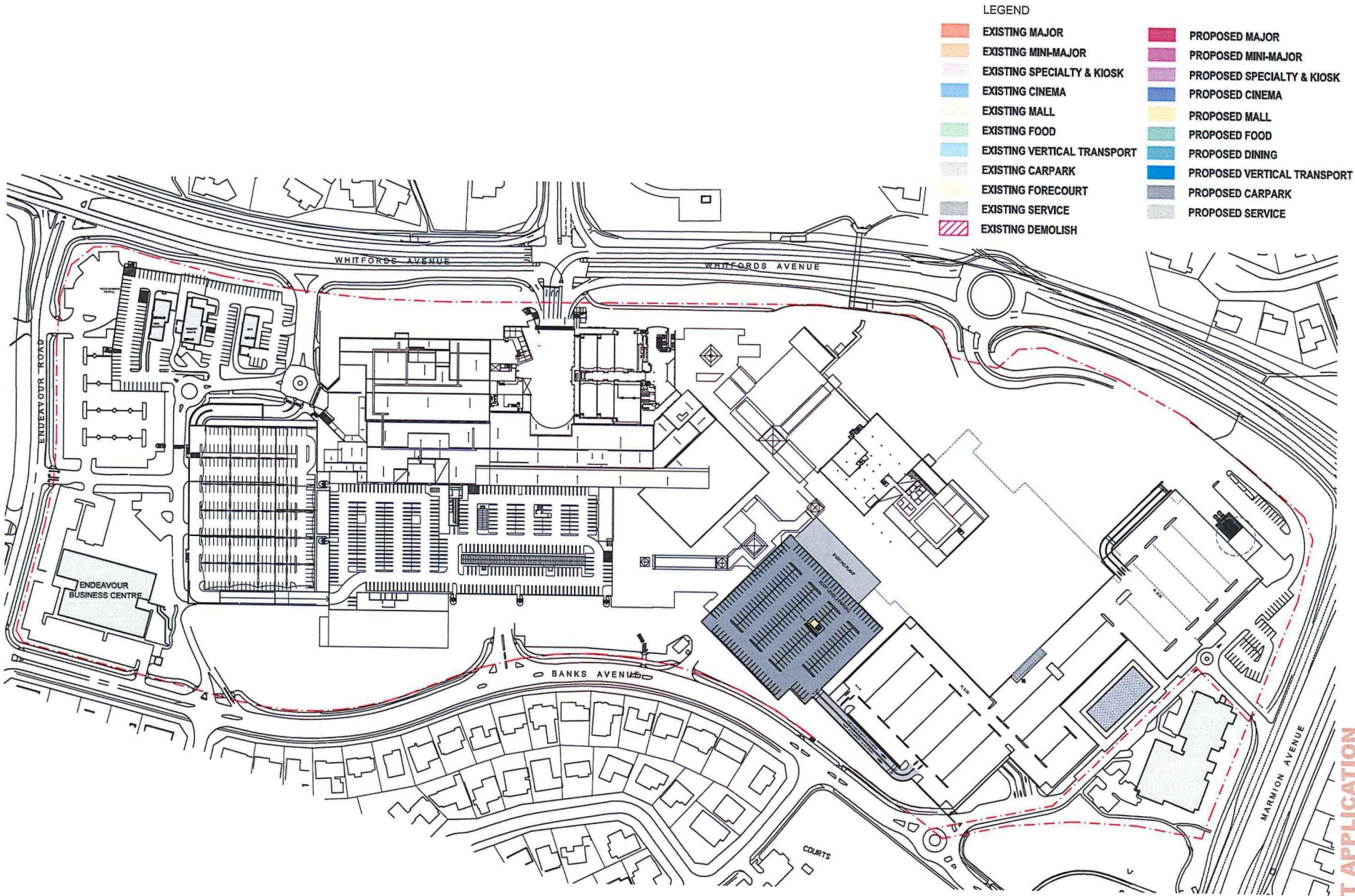
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 Westfield Design & Construction Pty Ltd

**Westfield**  
 RETAIL TRUST

**GIC**

Scale 1:1000	Project No. 11310
Drawing no. DA-06	Date JULY 2013
Revision A	





- LEGEND
- EXISTING MAJOR
  - EXISTING MINI-MAJOR
  - EXISTING SPECIALTY & KIOSK
  - EXISTING CINEMA
  - EXISTING MALL
  - EXISTING FOOD
  - EXISTING VERTICAL TRANSPORT
  - EXISTING CARPARK
  - EXISTING FORECOURT
  - EXISTING SERVICE
  - EXISTING DEMOLISH
  - PROPOSED MAJOR
  - PROPOSED MINI-MAJOR
  - PROPOSED SPECIALTY & KIOSK
  - PROPOSED CINEMA
  - PROPOSED MALL
  - PROPOSED FOOD
  - PROPOSED DINING
  - PROPOSED VERTICAL TRANSPORT
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  - PROPOSED SERVICE

**PROPOSED ROOF LEVEL 2**  
**SCALE 1:1000@B1**

**DEVELOPMENT APPLICATION**

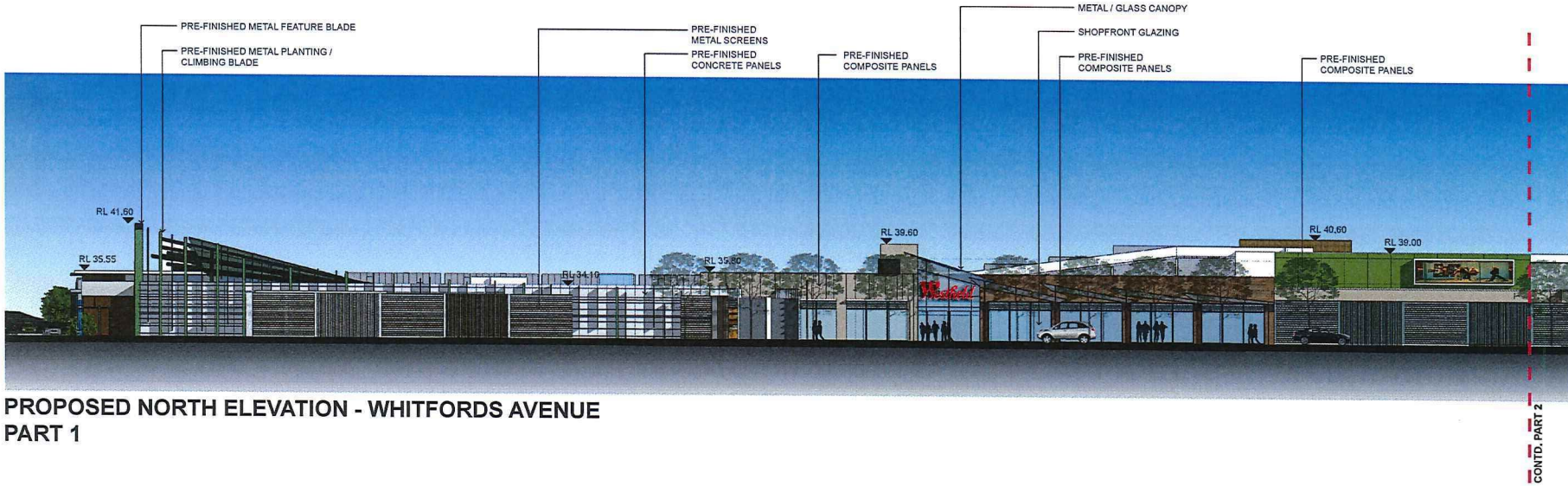
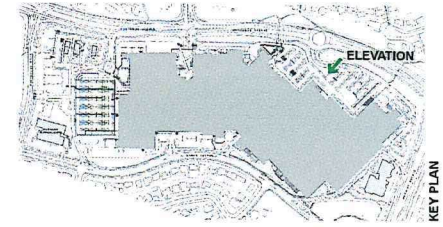
**PROPOSED ROOF LEVEL 2**  
**WHITFORD CITY**

Notes:  
 \* Refer to latest project documentation for existing plans, sections, elevations, etc., survey and details

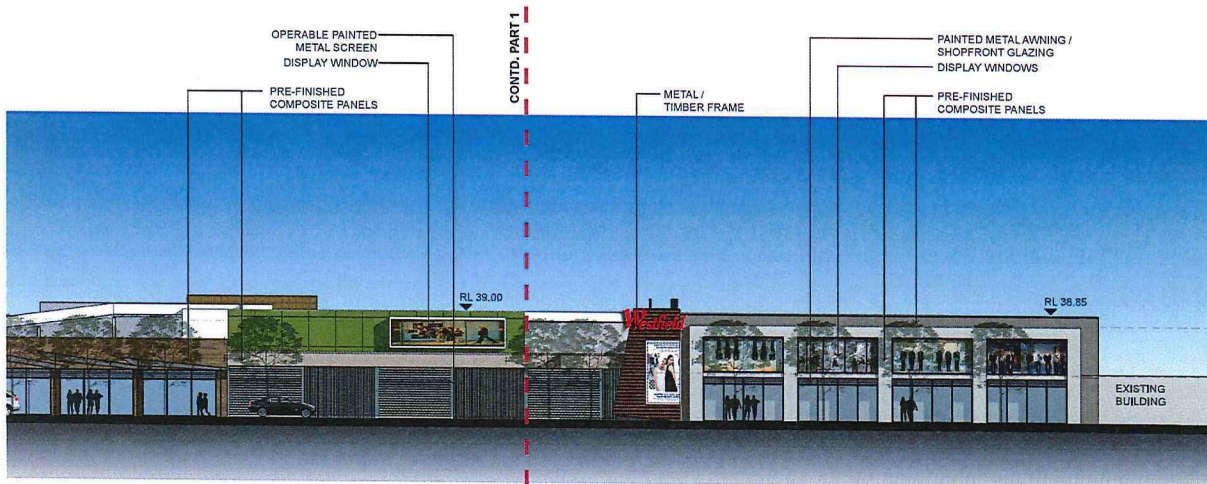


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	Date JULY 2013
Drawing no. DA-07	Revision A





**PROPOSED NORTH ELEVATION - WHITFORDS AVENUE  
PART 1**



**PROPOSED NORTH ELEVATION - WHITFORDS AVENUE  
PART 2**

**DEVELOPMENT APPLICATION**

**PROPOSED NORTH ELEVATION - WHITFORDS AVENUE  
WHITFORD CITY**

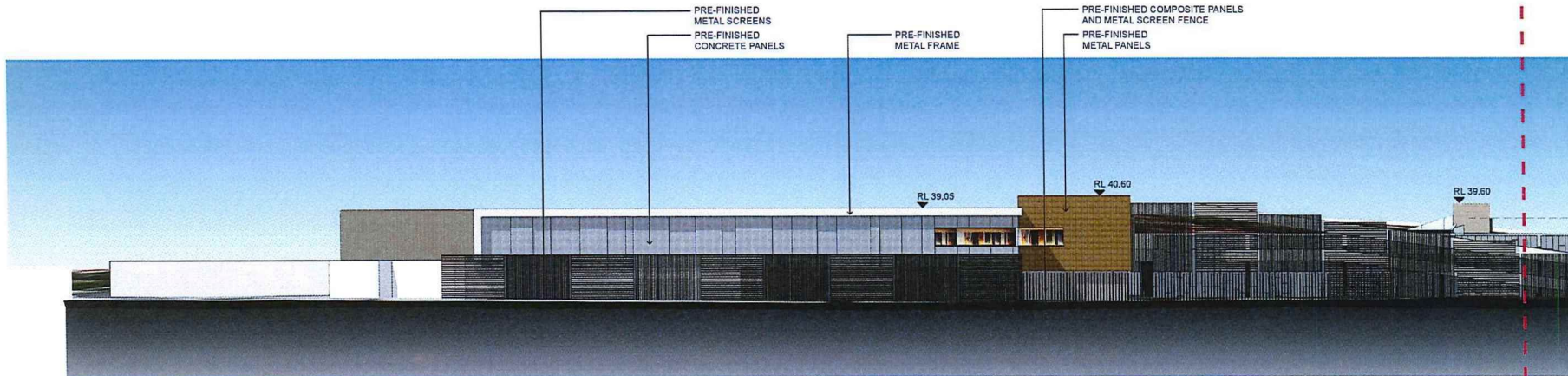
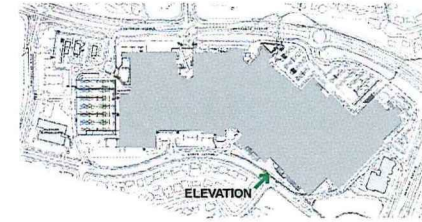
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\* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details

**Westfield**  
Westfield Design & Construction Pty Ltd

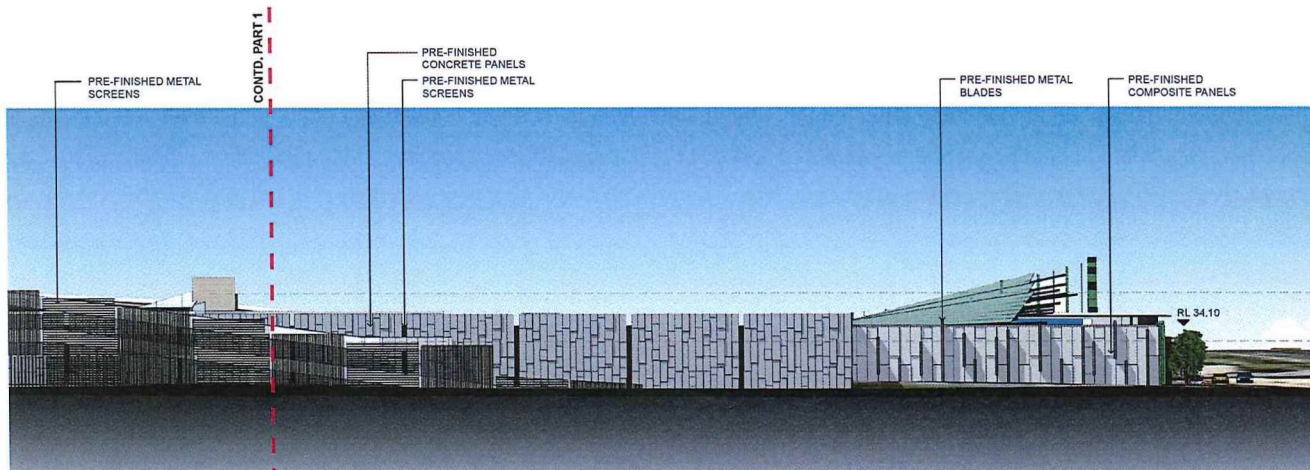
**Westfield**  
REAL TRUST

**GIC**

Scale 1:500	Project No. 11310
	Date JULY 2013
Drawing no. DA-13	Revision A



**PROPOSED SOUTH ELEVATION - BANK AVENUE  
PART 1**



**PROPOSED EAST ELEVATION - BANK AVENUE  
PART 2**

**DEVELOPMENT APPLICATION**

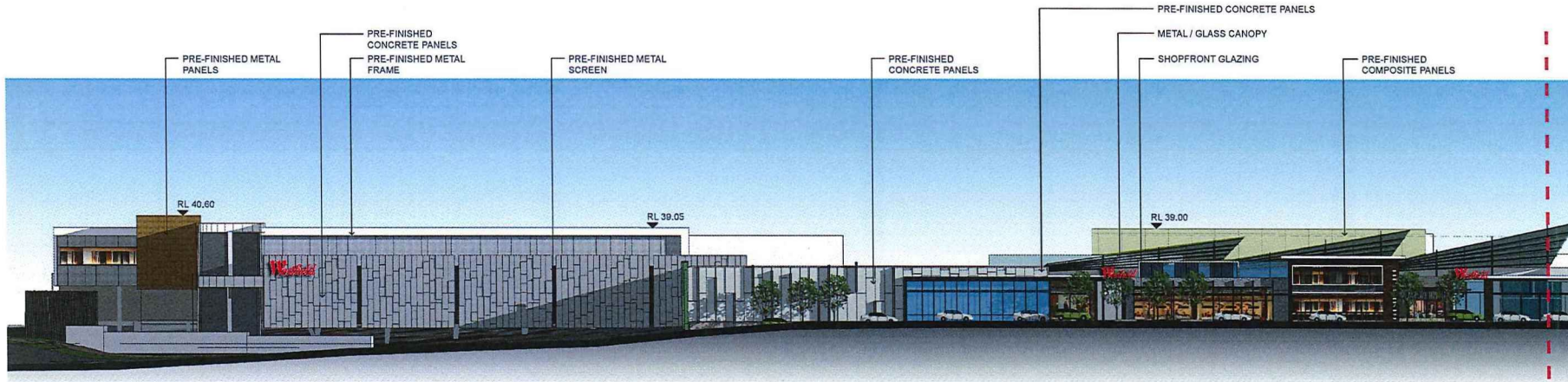
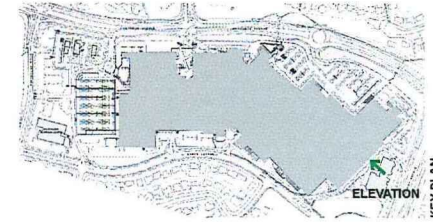
**PROPOSED SOUTH ELEVATION - BANK AVENUE  
WHITFORD CITY**

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details



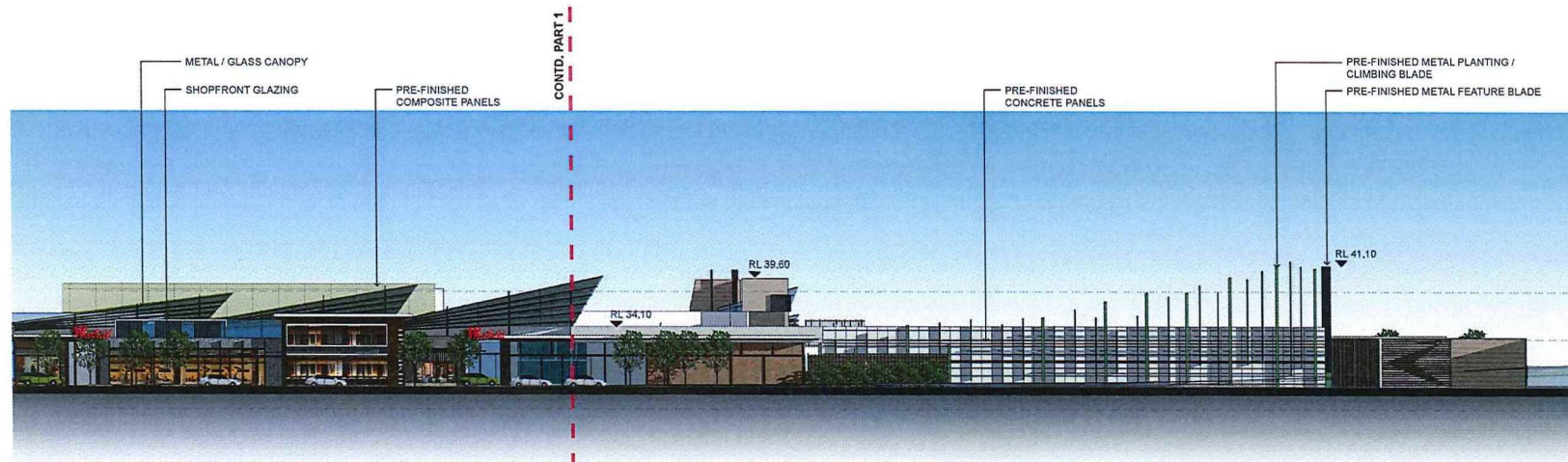
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Drawing no. DA-14	Date JULY 2013
Revision A	





**PROPOSED EAST ELEVATION - MARMION AVENUE  
PART 1**

CONTD. PART 2



**PROPOSED EAST ELEVATION - MARMION AVENUE  
PART 2**




















**DEVELOPMENT APPLICATION**

**PROPOSED EAST ELEVATION - MARMION AVENUE  
WHITFORD CITY**

Notes:  
\* Refer to latest project documentation for existing plans, sections, elevations, RL's, survey and details



Scale 1:500	Project No. 11310
Drawing no. DA-15	Date JULY 2013
	Revision A

-  Whitford Activity Centre Structure Plan Boundary
  -  District Boundary
  -  Existing Lot Boundary
- Districts**
-  Retail
  -  Banks
  -  Endeavour
  -  Education and Civic
- Residential Coding**
-  R-AC 0
  -  R80
- Other**
-  Main Street
  -  Landmark Site
  -  Community Focal Point
  -  Primary off street pedestrian connection
  -  Future vehicle connection (subject to Detailed Area Plan)
  -  Indicative primary vehicle access point
  -  Indicative primary vehicle access point (Left-in/ left-out only)
  -  Indicative primary vehicle access point (Left-in only)
  -  Existing controlled intersection (Traffic Lights)
  -  Proposed controlled intersection (Traffic Lights)

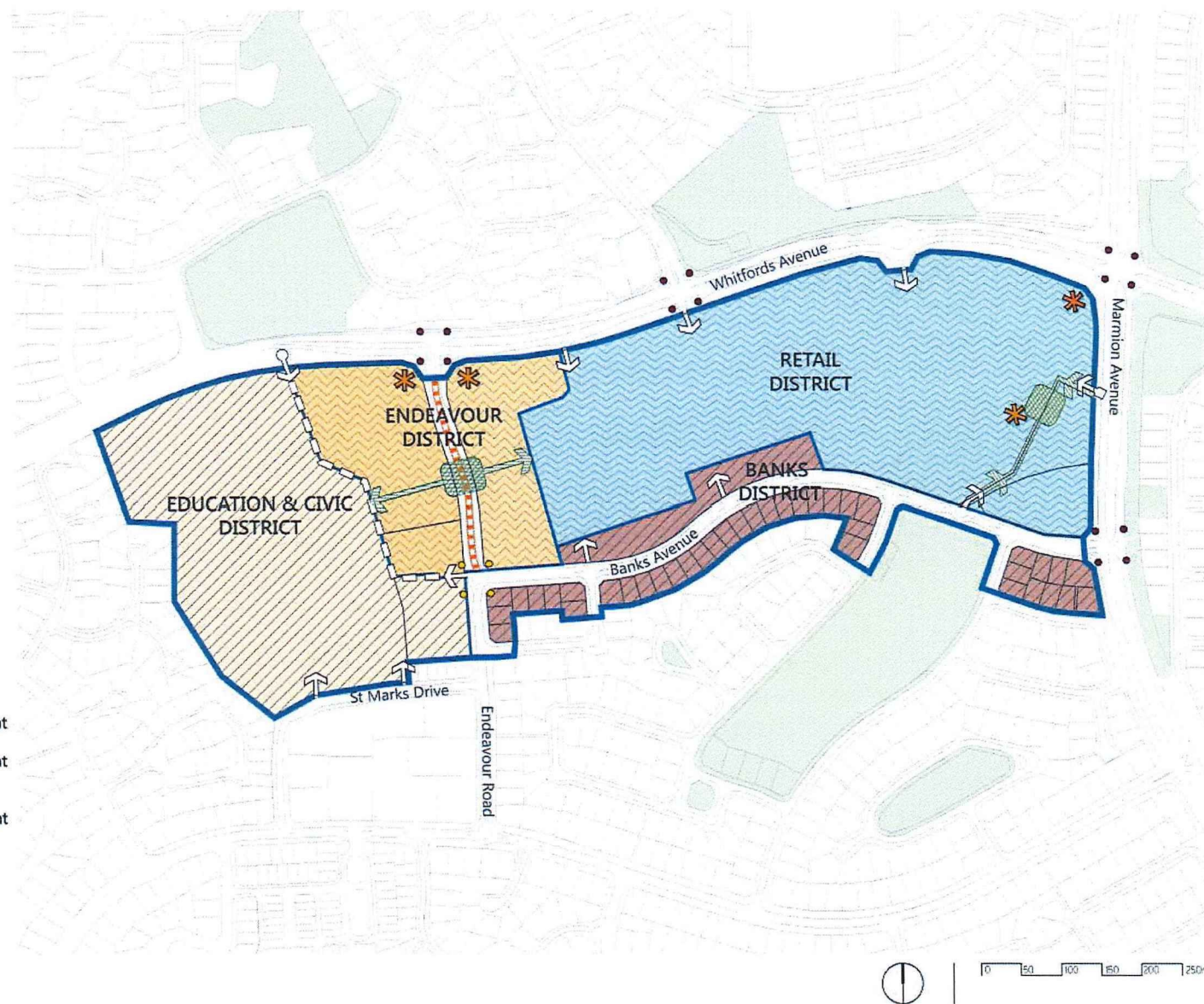
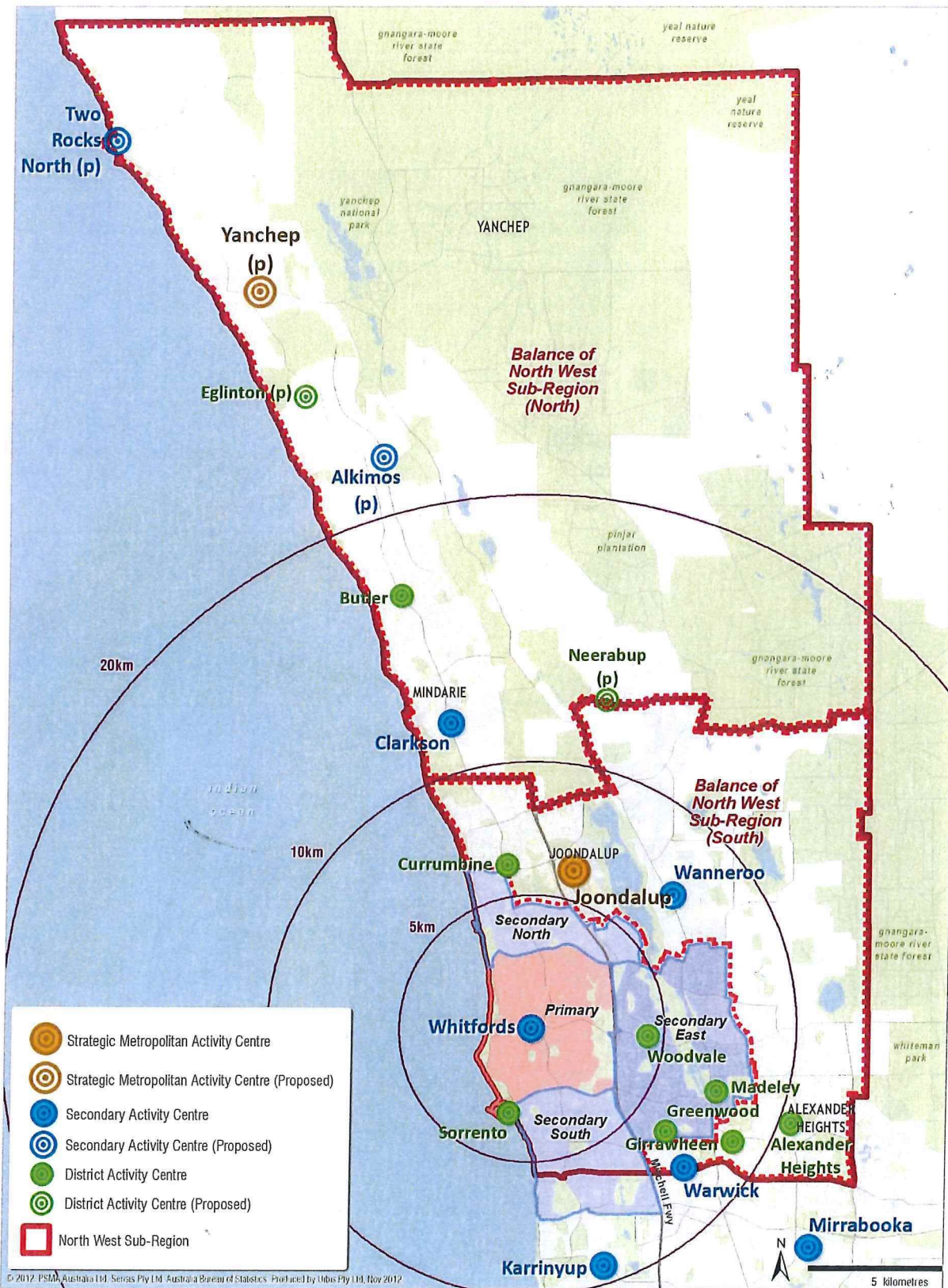


Figure 1. Structure Plan Map

# Main Trade Area

WHITFORDS ACTIVITY CENTRE



© 2012, PSM, Australia Ltd, Seras Pty Ltd, Australia Bureau of Statistics. Produced by Urbis Pty Ltd, Nov 2012

Whitford Activity Centre - Indicative Staging Plan



LEGEND:

- Stage 1 – Major retail expansion of Westfield Whitford City
- Stage 1A - Marmion Promenade (Co.J./Westfield)

- Stage 2 - Whitford City Existing Centre Refurbishments
- Stage 2 – Potential Commercial Building on Banks Avenue to sleeve existing centre -Subject to LDP

- Stage 3A - Major residential / mixed-use redevelopment (Progressively from 2017)
- Stage 3B - Major residential / mixed-use redevelopment (Progressively from 2020)
- D - Development by others