Metro Inner Development Assessment Panel Agenda

Meeting Date and Time: Wednesday, 15 October 2025; 9:30am
Meeting Number: MIDAP/101
Meeting Venue: 140 William Street, Perth

A live stream will be available at the time of the meeting, via the following link:
MIDAP/101 - 15 October 2025 - Town of Victoria Park - City of Fremantle

PART A – INTRODUCTION

1. Opening of Meeting, Welcome and Acknowledgement
2. Apologies
3. Noting of Minutes

PART B – TOWN OF VICTORIA PARK

1. Declarations of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications
   - 3.1 Nos. 147 (Lots 56 & 57) Burswood Road, Burswood - Proposed Childcare Premises and Offices – DAP/24/02697
4. Form 2 DAP Applications
5. Section 31 SAT Reconsiderations

PART C – CITY OF FREMANTLE

1. Declarations of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications
4. Form 2 DAP Applications
   - 4.1 Lot 201 (No.1) Goldsbrough St and Part Lot 40 (Nos.48-68) Cantonment St, Fremantle - Revitalisation of the Elders Wool Stores to accommodate multiple dwellings, office, restaurant/cafe, shop and tavern uses - Deletion of Condition 38 – DAP/25/02837
5. Section 31 SAT Reconsiderations

PART D – OTHER BUSINESS

1. State Administrative Tribunal Applications and Supreme Court Appeals
2. Meeting Closure

Please note, presentations for each item will be invited prior to the items noted on the agenda and the presentation details will be contained within the related information documentation

DAP Members
Francesca Lefante (Presiding Member) Dale Page(Deputy Presiding Member) Tony Arias Cr Peter Melrosa (Part B – Town of Victoria Park) Cr Ingrid Van Dorssen (Part C – City of Fremantle) Cr Jemima Williamson-Wong (Part C – City of Fremantle)
DAP Secretariat
Kristen Gray
Ashlee Kelly

PART A – INTRODUCTION

1. Opening of Meeting, Welcome and Acknowledgement

2. Apologies

3. Noting of Minutes

PART B – TOWN OF VICTORIA PARK

1. Declarations of Due Consideration

2. Disclosure of Interests

3. Form 1 DAP Applications

3.1 Nos. 147 (Lots 56 & 57) Burswood Road, Burswood - Proposed Childcare Premises and Offices – DAP/24/02697

4. Form 2 DAP Applications

Nil.

5. Section 31 SAT Reconsiderations

Nil.

Part B – Item 3.1 - NOS. 147 (LOTS 56 & 57) BURSWOOD ROAD, BURSWOOD – PROPOSED CHILD CARE PREMISES AND OFFICES

Form 1 – Responsible Authority Report
(Regulation 12)

DAP Name:	Metro Inner DAP
Local Government Area:	Town of Victoria Park
Applicant:	Rowe Group
Owner:	Ekta Holdings Pty Ltd
Value of Development:	$2.35 million
Responsible Authority:	Town of Victoria Park
Authorising Officer:	Manager Development Services
LG Reference:	5.2024.130.1
DAP File No:	DAP/24/02697
Application Received Date:	8 May 2024
Report Due Date:	3 October 2025
Application Statutory Process Timeframe:	90 Days
Attachment(s):	1. Aerial photo/site plan 2. Amended architectural drawings dated August 2025 3. Applicant's Planning Report 4. Applicant's Assessment of Development against Relevant Provisions 5. Amended Landscaping Plans dated August 2025 6. Transport Impact Statement 7. Noise Assessment 8. Waste Management Plan 9. Extract from Due Diligence Site Contamination Report 10. Sustainable Design Assessment Report 11. DRP Chair Review 12. Applicant's Response to Submissions

Responsible Authority Recommendation

That the Metro Inner DAP resolves to:

Approve DAP Application reference DAP/24/02697 and accompanying plans in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015* , and the provisions of the Town of Victoria Park Local Planning Scheme No. 2 subject to the following conditions

Operational

1. The number of children and staff attending the Child Care Premises is limited to a maximum of 85 children and 17 staff at any one time.

2. The development, once commenced, is to be carried out in accordance with the approved plans at all times, unless otherwise authorised by the Town.

3. To address the conditions of this approval, a covering letter (detailing compliance with each condition), copy of the final working drawings and relevant associated reports and information, are to be submitted by the applicant and be cleared by the Town.

Legal

4. Prior to the issuing of an occupancy permit, the subject lots (Lots 56 and 57) are to be amalgamated into a single lot on a Certificate of Title.

Parking and access

5. Prior to the occupation or use of the development, all car parking spaces together with their access aisles to be clearly paved, sealed, marked and drained in accordance with AS2890.1 and thereafter maintained to the satisfaction of the Town.

6. Prior to occupation of the development, a minimum of five bicycle facilities must be provided in accordance with Australian Standard AS 2890.3 and to the satisfaction of the Town. The bicycle parking facilities shall be installed and remain in place permanently unless otherwise approved by the Town.

7. Prior to occupation or use of the development, the redundant crossover/s, as shown on the approved plans, must be removed and the verge and kerb reinstated at the cost of the owner to the specification and satisfaction of the Town.

8. No building structures, landscaping or improvements are to be located within the 1.0 metre wide strip of right-of-way widening for the length of the common boundary with the right-of-way to allow for the future widening of the right-of-way.

External appearance

9. Prior to lodging an application for a building permit, final external colours, finishes and materials of the building(s) are to be provided for the Town's approval, which shall include further details of the proposed custom screen to both Burswood Road and the right-of-way.. Prior to the occupation of the development, the building(s) must be finished, and thereafter maintained, in accordance with the schedule provided and approved by the Town.

10. The boundary walls to the eastern and western boundaries are to have a painted finish and are to be architecturally treated with patterning, recessing

or other treatments to the satisfaction of the Town in order to ensure visual interest.

11. All windows and doors to street frontages are to be provided with clear glazing, and are not to be subsequently obscured by alternative window treatments, signage or internal shelves, to the satisfaction of the Town.

12. Prior to lodging an application for a building permit, all plant equipment, air conditioning units, hot water systems, water storage tanks, service metres, bin storage areas and clothes drying facilities must be located to minimise any visual and noise impact on the occupants of nearby properties and screened from view from the street. Design plans for the location, materials and construction for screening of any proposed external building plant must be submitted to and approved by the Town.

Landscaping

13. The landscaping areas shown on the approved landscaping plans shall be installed and reticulated prior to occupation of the development, and be thereafter maintained by the landowner(s) for the life of the development to the satisfaction of the Town.

Construction Management

14. Prior to lodging an application for a building permit, the applicant must submit and have approved by the Town, and thereafter implement to the satisfaction of the Town, a Construction Management Plan.

Acoustic report

15. Prior to lodging an application for a building permit, an updated Acoustic Report is to be provided confirming (a) that the selected mechanical plant will comply with the Noise Regulations; and (b) the proposed glazing construction to sensitive areas within the Child Care Premises in order to achieve acceptable internal noise levels.

16. The recommendations of the Lloyd George Acoustics Noise Assessment Report dated April 2024 are to be implemented and thereafter complied with by the operator and landowner(s) for the life of the development to the satisfaction of the Town.

Stormwater

17. Prior to lodging an application for a building permit, stormwater disposal plans, details and calculations must be submitted for approval by the Town and thereafter implemented, constructed and maintained to the satisfaction of the Town.

Contamination

18. Prior to commencement of development works, investigation for soil and groundwater contamination is to be carried out to determine if remediation is required.

If required, remediation, including validation of remediation, of any contamination identified shall be completed prior to the completion of construction works to the satisfaction of the Town of Victoria Park on advice from the Department of Water and Environmental Regulation, to ensure that the site is suitable for the proposed use.

Public Art

19. Prior to lodging an application for building permit, the applicant/owner is to contribute the sum of 1.0% of the value of the total construction value towards public art. (Refer to related Advice Note)

Waste

20. Development being in accordance with the approved Waste Management Plan at all times to the satisfaction of the Town.

21. At all times provision must be made onsite for the storage and collection of garbage and other solid waste. A waste storage and collection area must be graded, drained and screened from public view, and the garbage collected regularly, to the satisfaction of the Town.

Sustainability

22. Prior to lodging an application for a building permit a statement is to be provided by a suitably qualified sustainability consultant, confirming that the building as-designed will achieve the target of 4 Green Star (self certified) and the specific sustainability measures that are proposed to be implemented, to the satisfaction of the Town.

General

23. Signs do not form part of this approval and are to be the subject of separate application(s).

24. All building works to be carried out under this development approval are required to be contained within the boundaries of the subject lot.

25. This decision constitutes planning approval only and is valid for a period of four years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.

Advice Notes

AN1 Any amendments or modifications to the approved drawings forming part of this development approval may require the submission of an application for amendment to development approval and reassessment of the proposal.

AN2 Should the applicant be aggrieved by this decision a right of appeal may exist under the provisions of the Town Planning Scheme or the Metropolitan Region

Scheme and the applicant may apply for a review of the determination of Council by the State Administrative Tribunal within 28 days of the date of this decision.

AN3 In relation to the clearance of planning conditions, a building permit cannot be issued until the conditions of the development approval have been given a planning clearance by the Town. It is recommended that the relevant information be submitted prior to the submission of an application for a building permit in order to avoid delays in the processing of the building permit application. Should a building permit application be submitted without a planning clearance, then the building permit application will be put hold until a planning clearance is obtained or the application may be refused.

AN4 With regards to public art, the contribution being either :

i. payment directly to the Town which will be placed in the Town's Community Art Reserve with the funds being used by the Town to provide public art within the same Town Planning Scheme Precinct; or
ii. the owner/applicant to provide public art on the development site in accordance with the procedures outlined in the Town's Developers Public Art Handbook, which includes the submission of details for approval by Council. The public art is to be completed and installed to the satisfaction of the Town prior to the occupation of the development. The public art is to be maintained thereafter by the owner/occupiers;

AN7 The owner or occupier is required to display the street number allocated to the property in a prominent location clearly visible from the street that the building faces.

AN8 Crossover location and construction shall comply with the Town's Specifications for Crossover Construction. A separate application must be made to the Town's Street Improvement Unit (tel 9311 8115) for approval prior to construction of a new crossover. Residential Vehicle crossovers shall be constructed from the following approved materials: Brick / Block Pavers, In-Situ concrete, In-Situ Lime-Crete, In-Situ Exposed aggregate or any other material approved by the Town.

AN9 All stormwater drainage for commercial/industrial and multi residential developments (5 or more units) shall be designed and signed by a practicing Hydraulic Consultant. An overland flow path is to be included in the design to ensure diversion of stormwater from the developments during storm events.

AN10 The applicant shall submit a certified Stormwater Management Plan that will address issues associated with stormwater during storm events of 1:100 Annual Rainfall Interval (ARI) up to 24 hours duration, prior to the submission of a building permit. In the event that changes to the approved plans (i.e finished floor levels and ground levels) are required in order to comply with the stormwater drainage management plan, then an application for amendment to the development approval will be required.

AN11 The construction management plan is to address the following matters:

a) How materials and equipment will be delivered and removed from the site;
b) How materials and equipment will be stored on the site;
c) Parking arrangements for contractors;

d) Construction waste disposal strategy and location of waste disposal bins;
e) Details of cranes, large trucks or similar equipment which may block public thoroughfares during construction;
f) How risks of wind and/or water borne erosion and sedimentation will be minimised during and after the works;
g) Construction traffic and pedestrian management; and
h) Other matters likely to impact on the surrounding properties.

AN12 With respect to the site contamination condition, investigations and remediation are to be carried out in compliance with the Contaminated Sites Act 2003 and current Department of Water and Environmental Regulation contaminated sites guidelines. (Department of Water and Environmental Regulation)

AN13 In relation to the site contamination condition and in accordance with regulation 31(1)(c) of the Contaminated Sites Regulations 2006, a Mandatory Auditor's Report, prepared by an accredited contaminated sites auditor, will need to be submitted to the Department of Water and Environmental Regulation as evidence of compliance with the approval condition. A current list of accredited auditors is available from www.dwer.wa.gov.au.

AN14 Acid sulfate soils (ASS) risk mapping indicates that the site is located within an area identified as representing a high to moderate risk of ASS occurring within 3 metres of the natural soil surface. Please refer to Department of Water and Environmental Regulation's acid sulfate soil guidelines for information to assist with the management of ground and/or groundwater disturbing works. https://www.wa.gov.au/government/publications/treatment-and-management-of-soil-and-water-acid-sulfate-soil-landscapes

Building

AN15 A building permit is required to be obtained from the Town prior to commencement of any work in relation to this development approval.

AN16 Plans are to be assessed by a suitably qualified person to confirm compliance with the Disability (Access to Premises – Building) Standards, Building Code of Australia and relevant Australian Standards. A copy of the certified plans is to be provided as part of the building permit application.

AN17 Please note it is the responsibility of the building owner/developer to ensure the development complies with the *Disability Discrimination Act 1992*. Further information may be obtained from Disability Services (WA).

Environmental Health

AN18 Sound levels created are not to exceed the provisions of the *Environmental Protection (Noise) Regulations 1997.*

Engineering

AN19 A separate application is to be submitted to the Town's Street Improvement business unit for approval prior to construction of a new crossover. To submit a crossover application please complete a 'Crossover Installation Application

Form' and refer to the 'Crossover Installation Package'. Both documents are available from the Town's website.

AN20 A Work Zone Permit application is to be submitted to and approval issued the Town, prior to any works or temporary storage on a public thoroughfare (including roads, parking bays, footpaths or verges). To download an application form and for further information, please refer to the Towns website or contact the Town's Street Improvement business unit on (08) 9311 8111. It is noted that a Work Zone permit may not be permitted along some sections of Brodie-Hall Drive.

AN21 All stormwater soakwells located under paving are to have grated lids and all soakwells in driveway areas are to have a grated, trafficable lid.

Parks

AN22 The Town's street tree(s) are to be protected from damage during all phases of development. Pruning of any street tree affected by the development on the subject site is to be undertaken by the Town, at the owner/applicant's cost.

Details: outline of development application

Region Scheme	Metropolitan Region Scheme
Region Scheme - Zone/Reserve	Urban
Local Planning Scheme	Local Planning Scheme No. 2
Local Planning Scheme - Zone/Reserve	Mixed Use
Structure Plan/Precinct Plan	N/A
Structure Plan/Precinct Plan - Land Use Designation	N/A
Use Class and permissibility:	Child Care Premises – 'A' (discretionary) use Office – 'P' (permitted) use
Lot Size:	1226m^2
Existing Land Use:	Vacant land
State Heritage Register	No
Local Heritage	☒ N/A ☐ Heritage List ☐ Heritage Area
Design Review	☐ N/A ☒ Local Design Review Panel ☐ State Design Review Panel ☐ Other
Bushfire Prone Area	No
Swan River Trust Area	No

Proposal:

Proposed Land Use	Child Care Premises; Offices
Proposed Net Lettable Area	N/A

Proposed No. Storeys	2 storeys
Proposed No. Dwellings	N/A

The proposed development is for a two storey commercial development. The site has frontage to both Burswood Road and a right-of-way with vehicle access proposed via the right-of-way to an on-site car park containing 26 parking bays and four bicycle bays. A 1.0m wide strip of land adjacent to the right-of-way is set aside for future ceding and widening of the right-of-way.

Two ground floor commercial tenancies (for Office use) are proposed fronting Burswood Road.

A Child Care Premises is proposed comprising a reception area and office space at ground level fronting the right-of-way, and the entirety of the first floor inclusive of indoor and outdoor play spaces.

The applicant has indicated that the Child Care Premises will operate based upon -

- A maximum of 85 children;
- A maximum of 17 staff on-site at any one time;
- Proposed operating hours of 6.30am to 6.30pm Monday to Friday.

The applicant has indicated that the proposed signage has been removed from the application and will be the subject of a separate application in the future.

The application is supported by drawings and information listed above under Attachments.

The applicant submits in their Planning Report (see Attachment 3) that the development should be supported for the following reasons –

- *"The proposal will assist to meet an existing demand for additional childcare services in the locality, based on the current population of the suburbs of Burswood, Lathlain and Victoria Park.*
- *The proposal will assist to meet demand for additional childcare services in the locality, based on the future population projections within the suburbs of Burswood, Lathlain and Victoria Park outlined in the Town of Victoria Park Local Planning Strategy (LPS).*
- *The proposal is supported by a Noise Assessment which demonstrates compliance with the provisions of State Planning Policy No. 5.4 – Road and Rail Noise (SPP5.4).*
- *The proposed development satisfies the 10 design principles outlined in State Planning Policy No. 7.0 – Design of the Built Environment (SPP 7.0).*
- *The subject site is zoned 'Urban' under the Metropolitan Region Scheme (MRS). The proposed development is consistent with development within this zone.*
- *The proposed land uses are capable of being approved within the 'Mixed Use' zone, as specified in the Zoning Table of the Town of Victoria Park Local Planning Scheme No. 2 (LPS 2).*
- *The proposed development is generally consistent with the provisions of the Town's Local Planning Policy No. 6 – Family Day Care and Child Care Premises (LPP 6), Local Planning Policy No. 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way (LPP 7), Local Planning Policy*

No. 22 – Development Standards for Causeway Precinct (LPP 22), Local Planning Policy No. 23 – Bicycle Parking, Car Parking and Access for Non-Residential Development (LPP 23), Local Planning Policy No. 38 – Signs (LPP 38), Local Planning Policy No. 45 – Tree Planting for Non-Residential Development (LPP 45) and Local Planning Policy No. 46 – Sustainable Development (LPP 46).

- *The Development Application is supported by a Transport Impact Statement (TIS) which addresses the requirements of the Western Australian Planning Commission Transport Impact Assessment Guidelines and demonstrates that the proposed development will not have an adverse impact on the surrounding road network.*
- *The Development Application is supported by a Waste Management Plan (WMP) which addresses the storage and collection of waste generated by the proposed development.*
- *The Development Application is supported by an Energy Efficiency Report (EER) which demonstrates compliance with the National Construction Code, in particular the Section J energy efficiency requirements.*
- *The Development Application is supported by a Noise Assessment which demonstrates that the proposed development will comply with the assigned noise levels of the Environmental Protection (Noise) Regulations 1997 (Noise Regulations).*
- *The Development Application is supported by a Stormwater Drainage Plan (SDP) which demonstrates that the proposed development can retain stormwater on-site from a 1 in a 100 year rainfall event of a storm duration of 5 minutes.*

The development is consistent with the principles of orderly and proper planning and represents an important community service to be provided within the Town."

Background:

Based on the Town of Victoria Park's archive records, the subject sites were used for a service station and vehicle servicing for a number of years. In 2010 the Town retrospectively approved the use of the sites for car parking for the nearby Perth Montessori School. The existing buildings on the site were demolished in 2022.

Site Context

The subject site has frontage to both Burswood Road and a right-of-way. The right-of-way is currently 5.0m wide adjacent to the subject site. On the opposite side of the right-of-way is GO Edwards Park. The site is adjoined by commercial development on either side and across Burswood Road, with residential development further to the south. The site is within the area known as the Causeway Precinct.

Given the previous use of the site for vehicle servicing and the identification of low levels of contamination, there is a Memorial registered on the title recording the site classification as 'Possibly contaminated – investigation required' (registered October 2024). Relevant correspondence of the time from the Department of Water and Environmental Regulation (DWER) states that *"a responsible authority (eg. Local Government authorities may not grant approval under a scheme for any proposed development of the land without seeking, and taking into account, advice from the department as to the suitability of the proposed development."*

Legislation and Policy:

Legislation

- *Planning and Development Act 2005;*
- *Planning and Development (Development Assessment Panels) Regulations 2011;*
- *Planning and Development (Local Planning Schemes) Regulations 2015;*
- *Town of Victoria Park Local Planning Scheme No. 2.*

State Government Policies

- *State Planning Policy No. 5.4 – Road and Rail Noise (SPP5.4).*
- *State Planning Policy 7.0 'Design of the Built Environment'*
- *Department of Planning, Lands and Heritage Draft Position Statement: Child Care Premises (April 2025)*

Local Policies

- *Local Planning Policy No. 6 – Family Day Care and Child Care Premises*
- *Local Planning Policy 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way*
- *Local Planning Policy 22 – Development Standards for Causeway Precinct*
- *Local Planning Policy No. 23 - Bicycle Parking, Car Parking and Access for Non-Residential Development*
- *Local Planning Policy 29 - Public Art Private Developer Contribution*
- *Local Planning Policy No. 38 – Signs*
- *Local Planning Policy No. 45 – Tree Planting for Non-Residential Development*

Consultation:

Public Consultation

In accordance with the Town's Local Planning Policy No. 37, the application was formally advertised for a period of 28 days commencing on 21 August 2025 and concluding on 19 September 2025. The following consultation methods were employed:

- Two signs were placed on site. One fronting Burswood Road and one fronting the right-of-way;
- Letters sent to owners and occupiers of all properties within a 200 metre radius; and
- Copies of the plans and application documentation were made available on the Town's website.

A total of 3 submissions were received, with 2 submissions objecting and one submission neither supporting or objecting. The concerns expressed largely relate to the use of the right-of-way for vehicle access to and from the site, potential access and safety issues resulting from increased traffic using the right-of-way and surrounding streets.

Refer to Attachment 12 for the Applicant's Response to Submissions.

Referrals/consultation with Government/Service Agencies

The Town referred the proposal to DWER in June 2024. DWER's initial response included that further investigation of site contamination is required, and given the uncertainty the Department cannot comment on the suitability of the site for the proposed development, however went on to recommend specific conditions that should be applied on any approval granted as follows -

"Condition X
a) Prior to commencement of development works, investigation for soil and groundwater contamination is to be carried out to determine if remediation is required.

b) If required, remediation, including validation of remediation, of any contamination identified shall be completed prior to the completion of construction works to the satisfaction of the Town of Victoria Park on advice from the Department of Water and Environmental Regulation, to ensure that the site is suitable for the proposed use.

Investigations and remediation are to be carried out in compliance with the Contaminated Sites Act 2003 and current Department of Water and Environmental Regulation contaminated sites guidelines. (Department of Water and Environmental Regulation)

Advice
In relation to Condition [X] and in accordance with regulation 31(1)(c) of the Contaminated Sites Regulations 2006, a Mandatory Auditor's Report, prepared by an accredited contaminated sites auditor, will need to be submitted to the Department of Water and Environmental Regulation as evidence of compliance with Condition [X]. A current list of accredited auditors is available from www.dwer.wa.gov.au.

Advice
Acid sulfate soils (ASS) risk mapping indicates that the site is located within an area identified as representing a high to moderate risk of ASS occurring within 3 metres of the natural soil surface. Please refer to Department of Water and Environmental Regulation's acid sulfate soil guidelines for information to assist with the management of ground and/or groundwater disturbing works. https://www.wa.gov.au/government/publications/treatment-and-management-of-soil-and-water-acid-sulfate-soil-landscapes"

On this basis, the Town and the applicant agreed to put the development application on hold pending further site investigations.

In March 2025, the applicant requested that the Town revisit the contamination issue and the need for the development application to be placed on hold pending this matter being attended to.

Accordingly the Town sought clarification from DWER on their advice of June 2024, with DWER now commenting that *"there is no reason from our perspective for the issue of the DA to be delayed. Investigations and remediation to ensure that land is suitable for a sensitive land use to address a contamination condition is a standard process – this is still the case even where we have also classified the site. Essentially the work to satisfy the contamination condition would also address the requirements of the site classification."*

Design Review Panel Advice

The Town's Design Review Panel (DRP) have been involved in the design assessment of the proposed development, reviewing concept proposals for the development and providing preliminary feedback prior to the submission of the application. The development has also been presented to the DRP two times after being formally submitted to the Town.

The final review of the proposal and the current amended plans was undertaken by the DRP Chair, with recommendations including –

- *Review the detail and finish of the Burswood Road canopy at the detailed design stage.*
- *Review AC provision and locations. Alternatively, the ToVP may wish to address this via a condition of approval.*
- *Check that internal corridor widths meet prevailing standards.*
- *Confirm the functionality of the bike parking against relevant standards. Alternatively, the ToVP may wish to address this via a condition of approval.*
- *Review the form and quantity of EV charging.*
- *Commit to sustainability initiatives that can be readily assessed as having been included at the BP and PC stages.*
- *The ToVP may wish to include a condition of approval that requires a clarification of the included sustainability commitments to the Town's satisfaction, prior to Building Permit to ensure appropriate follow-through from the aspirations expressed at DA stage.*
- *Review the relative placement of the office and meeting room to the childcare centre.*
- *Be more playful in the finishes/colours to the car park.*
- *Review the effectiveness of the street canopy.*
- *Optimise privacy of WCs*
- *Better relate the childcare centre signage to the childcare entrances.*
- *Better integrate the disabled parking bay and landing space into the pedestrian realm within the car park. Alternatively, the ToVP may wish to address this a condition of approval.*
- *Investigate whether the childcare entrance and stair on Burswood Road can be swapped.*
- *Ensure during the detailed design process that there is adequate lighting to all pedestrian routes.*
- *Add the missing wheel stop.*
- *Check the design against fire requirements during the detailed design process.*
- *Refine the decorative screening at the detailed design stage to make it more place specific.*
- *Use applied colour creatively in entry locations to better express the nature of the childcare centre.*
- *Review the treatment of the side walls and how/where they meet the face brick elevations.*

The DRP Chair's concluding comments on the proposal are as follows –

"The Panel thanks the Applicant for presenting the updated design, which is a significant improvement on the initial iteration and is broadly supported by the Panel.

Since the second review, the landscape and playscape proposals have also been significantly improved.

The design has now reached a point where it is considered by the Panel to satisfy the 10 design principles of SPP7. Nevertheless, the Panel has helpfully identified areas for further improvement that could be addressed during the detailed design process, some of which the ToVP may wish to cover with a condition of approval to ensure they are resolved prior to Building Permit.

In summary, the proposed design is a good example of how a childcare centre can be integrated into an urban environment and, if well-executed in the detailed design stage, has the potential to be an exemplary development."

Refer to Attachment 11 to view the DRP Chair's final comments and recommendation on the proposal in full.

Other Advice

Internal referrals comments were sought from the following service areas at the Town:

- Place Planning;
- Building;
- Street Improvement;
- Environmental Health; and
- Parks.

Relevant comments from these service areas were provided to the applicant and resulted in further information being submitted. Internal referral comments have been considered in the assessment of this application.

Planning Assessment:

The proposal has been assessed against all the relevant legislative requirements of the Scheme, State and Local Planning Policies, outlined in the Legislation and Policy section of this report. The following matters have been identified as key considerations for the determination of this application –

- Desired future character for the Causeway Precinct;
- Land use (General);
- Land use to right-of-way;
- Setback of upper floor to right-of-way;
- Traffic, parking and access;
- Noise;
- Hours of operation;
- Public art;

These matters are outlined and assessed below.

Desired future character for the Causeway Precinct

In 2009 the Town approved the Causeway Precinct Review Final Report, which reviewed the desired future character and built form controls for the area known as the

Causeway Precinct. This report then informed relevant changes to the planning framework including a Scheme Amendment and the adoption of LPP23 'Development Standards for the Causeway Precinct'. Under LPP23 the Precinct is divided into 7 areas, and for each area the LPP identifies the desired future character and specific development standards that apply.

Under LPP22 the subject site is located within Area 4 'Parkside Terrace' with the desired future character for this area being as follows –

"This area will undergo significant change, with new residential development up to 6 storeys fronting GO Edwards Park and forming an urban terrace edge of apartments. The laneway will be widened and significantly upgraded, becoming a mini-street flanking the park. Thinning and under-pruning of trees will provide sight lines into the park to improve safety for park users. Apartments will front onto the new mini-street and address the park, providing surveillance for park safety while offering amenity and views for residents. Additional dedicated pedestrian entry to apartments will be provided off the Burswood Road frontage.

Modern commercial frontage required to Burswood road at street level with office and/or residential above, to a maximum of 3 storeys. All car parking accessed off the mini-street."

Land Use (General):

'Child Care Premises' is an 'A' (discretionary) use within the Mixed Use Zone, pursuant to the Town of Victoria Park Local Planning Scheme No.2. This means the use is not permitted unless the decision maker has exercised its discretion by granting development approval.

Having regard to the relevant planning framework and the site context it is considered that the proposed use as a Child Care Centre is consistent with the intent of the Scheme and relevant planning policies, and is therefore an acceptable use of the land subject to the use not impacting upon the amenity of adjoining residential properties specifically by way of traffic and noise (addressed below).

LPP6 also provides advice on suitable locations for child care premises as follows:

i. within convenient walking distance of commercial, recreation or community nodes and education facilities;
ii. located in areas where adjoining uses are compatible with a child care premises;
iii. serviced by public transport;
iv. considered suitable from a traffic engineering/safety perspective; and
v. of sufficient size and dimension to accommodate the development.

The subject site is located on Burswood Road, with an adjacent park and nearby school, and located within a commercial area, albeit within close walking distance of residential properties.

The site has an area of approximately 1,226m^2 and is of sufficient size to accommodate the required outdoor play spaces, car parking and facilities for the centre.

As outlined below, the matter of traffic is considered by the Town to be acceptable.

Accordingly it is considered that the development satisfies the relevant Policy criteria and that the proposed use land is acceptable provided there is no adverse amenity impacts on nearby properties.

Land use to right-of-way

LPP22 outlines the preferred land use being *"Mandatory residential frontage to mini-street and park, commercial frontage to Burswood Road at street level with residential and/or commercial above."*

The development achieves the requirement for a commercial frontage at ground level to Burswood Road with commercial above, but proposes a commercial frontage to the right-of-way in lieu of a mandatory residential use.

In support of this variation, the application contends that :

- *"The proposal will include ground level commercial uses to activate the streetscape.*

- *The proposed first floor childcare centre will provide a necessary community service to the surrounding existing residential and future residents of future residential development within the Parkside Terrace Precinct.*

- *The proposed development includes frontage of two commercial tenancies to Burswood Road, and frontage from the childcare entryway to the laneway / right of way. A variation is sought to the requirement for a residential land use facing the laneway / right of way and opposite park. We are of the view that the proposed variation should be supported for the following reasons:*

    - *As mentioned in Section 5.1 of this Report, the Town is expected to experience population growth (18,000 dwellings by 2050 and up to 53,000 people by 2041). This will place significant pressure on existing childcare services and will result in the need for additional childcare centres.*
    - *Based on current ABS data, there is already a demand for childcare centre services in the suburbs of Lathlain, Victoria Park and Burswood. The proposal will help address this demand in a location which is intended to be developed for higher density residential development.*
    - *The location of a childcare centre in this location, will mean that it is not necessary to be located within a residential area.*
    - *The proposed development has been designed to be able to be adapted for residential uses in the future."*

The Causeway Precinct Review Background Report (2009) clarifies that the intent of the policy provision requiring a mandatory residential frontage to the laneway is to "*attract high density residential development overlooking the parklands to share this asset and location, provide city and river views, and improve activity and safety in the park."*

However the extent of redevelopment that has occurred within the Causeway Precinct has been limited, despite the change in planning provisions of the time intended to encourage redevelopment. Accordingly the Town intends to review the relevant Causeway Precinct Policy within the next few years.

On balance, Officers support the development without a residential component fronting the ROW accepting that the proposed use as child care premises and without any residential component will benefit the area through the activity of people. The Town is supportive of high quality development in the area to raise the image and profile of the area and hopefully attract other high quality development.

Setback of upper floor from right-of-way

Under Clause 2 (d) of Local Planning Policy No. 22 'Development Standards for Causeway Precinct' the applicable setbacks to the Lane/mini street are - mandatory 2m setback at ground floor and 4m above ground floor; balconies may project into the setback area a maximum of 2m (ie. 2m minimum setback from the lane/mini street). Please note, the Town has calculated the ROW setback as being measured from the new boundary following the widening of the right of way to the external façade.

The 4m setback to upper floors contemplates a building of up to six storeys fronting the right-of-way and therefore the need for the upper floors to be setback further from a bulk and scale perspective.

The application proposes a setback of 2.0m to the right-of-way at both the ground floor and first floor level, being compliant for the ground floor and a 2.0m variation to the upper floor setback.

It is noted that the non-compliant section of the upper floor primarily comprises the custom screening with smaller sections of solid wall (at the 2.0m setback) with the stairwell/lift element being at a 3.75m setback.

Given the variation is confined to one level only, and is predominantly visually permeable, it is considered that there are no adverse visual or building scale impacts arising from supporting a setback variation. The alternative of pushing the upper floor back to achieve setback compliance would reduce the extent of outdoor playing space provided for the development.

Traffic, parking and access

LPP23 outlines requirements for bicycle parking, car parking, end-of-trip facilities and access for non-residential development. Requirements are provided based on proposed land use.

No minimum or maximum car parking requirements are detailed under LPP 23 leaving it to landowners and applicants to determine their own parking requirements based upon their parking needs.

The development proposes a total of 26 parking bays, including:

- 7 bays allocated for Office use;
- 19 bays allocated for Child Care use, including 7 dedicated staff bays.
- 1 ACROD parking bay;
- 1 EV charging bay;

LPP23 requires that where on-site parking is provided, then ACROD bays be provided at a rate of one bay per 20 parking bays, in this case equating to 1.3 bays (being a minimum requirement of 2 ACROD bays). This exceeds the applicable ACROD parking rate of one bay per 50 parking bays under the National Construction Code (NCC).

The applicant's justification for this variation includes -

" … most of the parking demand by the proposed development is generated from the pick-up and drop-off needs of parents and carers, where parking is short term in nature. This creates a fast turnaround of available parking bays where a restricted number of bays can service greater number of people.

The submitted Transport Impact Statement has identified a volume of 32 vehicles utilising the development during the AM peak. This would render less than 10 vehicles per hour, rendering the demand for bays significantly below the 20 bay threshold for ACROD bays.

Furthermore, alternative access measures for the proposed developments include proximity to public transport, specifically Burswood Railway Station & Victoria Park Railway Station, and proximity to the shared path network."

Officers are satisfied that the provision of one on-site ACROD bay as per the NCC is sufficient.

In relation to the provision of bicycle parking under LPP23 -

Land Use	Bicycle Parking Requirements	Assessment
Offices	• 1 space per 500m² NLA (short stay) and • 1 space per 250m² NLA (long stay)	NLA of 116m^2 Therefore 2 bicycle bays required.
Child Care Premises	• 1 space per 100m² NLA (short stay) and • 1 space per 250m² NLA (long stay)	NLA of 535m^2 Therefore 9 bicycle bays required.
	Total Bicycle Parking Required	11 bicycle bays

4 bicycle bays are provided in total as part of this development proposal, consisting of two bicycle racks that can each hold two bicycles.

This equates to a shortfall of 7 bicycle bays across the development. The applicant has provided justification for not applying a short-stay bicycle parking requirements to the child care premises (equating to 6 of the required 11 bays) including -

"There is no provision made for short stay child-care bike parking for the following reasons:

- *The primary users — infants and toddlers — are not independent cyclists.*
- *Parents or carers typically arrive by car due to the need to transport children, bags, prams, and other items.*

- *Bike parking near drop-off zones can conflict with pedestrian and vehicle movements, increasing risk during busy drop-off/pick-up times.*
- *Children are unpredictable near moving bikes and vehicles.*
- *Short-stay bike parking is designed for quick visits, but child-care drop-offs and pickups are often brief and not conducive to cycling for most parents.*
- *Most parents prefer secure long-stay parking if they cycle to work after drop-off."*

The Town's Officers accept these arguments. Not applying the short-term bicycle parking requirements to the Child Care Premises then reduces the total required bike parking for the development from 11 bays to 5 bays, a shortfall of one bay. A condition of approval will be included to satisfy this requirement:

Traffic and access

The application is supported by a Transport Impact Statement (TIS). Access to the site is proposed along the existing laneway located at the rear of the site. No vehicle access is proposed along Burswood Road. The TIS assesses that :

- The proposed development is predicted to generate approximately 375 daily trips and 71 trips during the morning peak hour and 72 during the afternoon peak hour.

- The estimated 71 to 72 vehicles per hour is at the higher end of this range and so the development traffic is considered to have a moderate impact and can be accommodated within the existing capacity of the road network

The TIS concludes that the proposed development will not have an adverse impact on the surrounding road network and that the proposed development incorporates sufficient parking.

The Town's Traffic Engineer has reviewed the TIS and agrees with the conclusions that the traffic impact of the development is acceptable.

It is noted that concerns have been expressed by some submitters in relation to the existing condition and future use of the right-of-way. It is accepted that the right-of-way is in need of upgrade.

Consistent with the Causeway Precinct vision for the right-of-way to become a mini-street, the Town has developed concept plans for the future upgrading of the right-of-way. There is no current budget commitment to fund the works, but it is likely that funding may be sought within the next few years.

However, for the meantime the fact remains that the right-of-way has and continues to provide functional access to adjoining properties and the provision of vehicle access to the development site from the right-of-way rather than Burswood Road is supported.

<u>Noise</u>

In support of the application, the application has submitted an Acoustic Assessment report which was undertaken using noise modelling and considered child play, mechanical plant and car door closings.

The conclusions of this report includes that –

- The predicted noise from all children playing outside is predicted to be compliant, with recommended measures to further minimise impacts.
- For mechanical plant, once it has been designed and selected, the noise levels shall be reviewed prior to building permit application.
- The predicted noise from car door closings is predicted to be compliant.
- In terms of transport noise
    - Predicted noise levels from road traffic, at the facade of the CCC Building, are above the outdoor noise target of *State Planning Policy No. 5.4 Road and Rail Noise*. During detailed design and prior to Building Permit, glazing construction shall be reviewed for sensitive areas within the CCC, in order to achieve acceptable internal noise levels.
- Noise levels to the outdoor play areas are generally considered compliant with the majority below the outdoor noise target.

Conditions of approval are proposed to deal with these matters.

Hours of operation

Under Clause 2.6 (c) of Local Planning Policy No. 6 – Family Day Care and Childcare Premises, *"As a general rule, the hours of operation of a child care premises should be limited to between the hours of 7am and 7pm Monday to Saturday, and 9am to 5pm on Sunday, unless otherwise agreed to by Council*."

In this case the application seeks approval to operate from 6.30am to 6.30pm Monday to Friday.

As the childcare centre is not in proximity of any existing sensitive land uses or residential development, and in any event modelling indicates would be compliant with the Noise Regulations, a variation to the operating hours is supported.

Public Art

LPP29 applies to all applications for development approval within the Town (both new buildings and additions/alterations to existing buildings), where the development has an estimated development cost of $2,000,000 or more. The proposed development has an estimated cost of $2,350,000 and therefore LPP29 applies.

It is understood from the applicant that the landowner's intention is to use the feature screening device on the Burswood Road and ROW elevations as the public art contribution

Should the application be approved by the JDAP it is recommended that a condition be included requiring a public art contribution as per LPP29.

Deemed clause 67

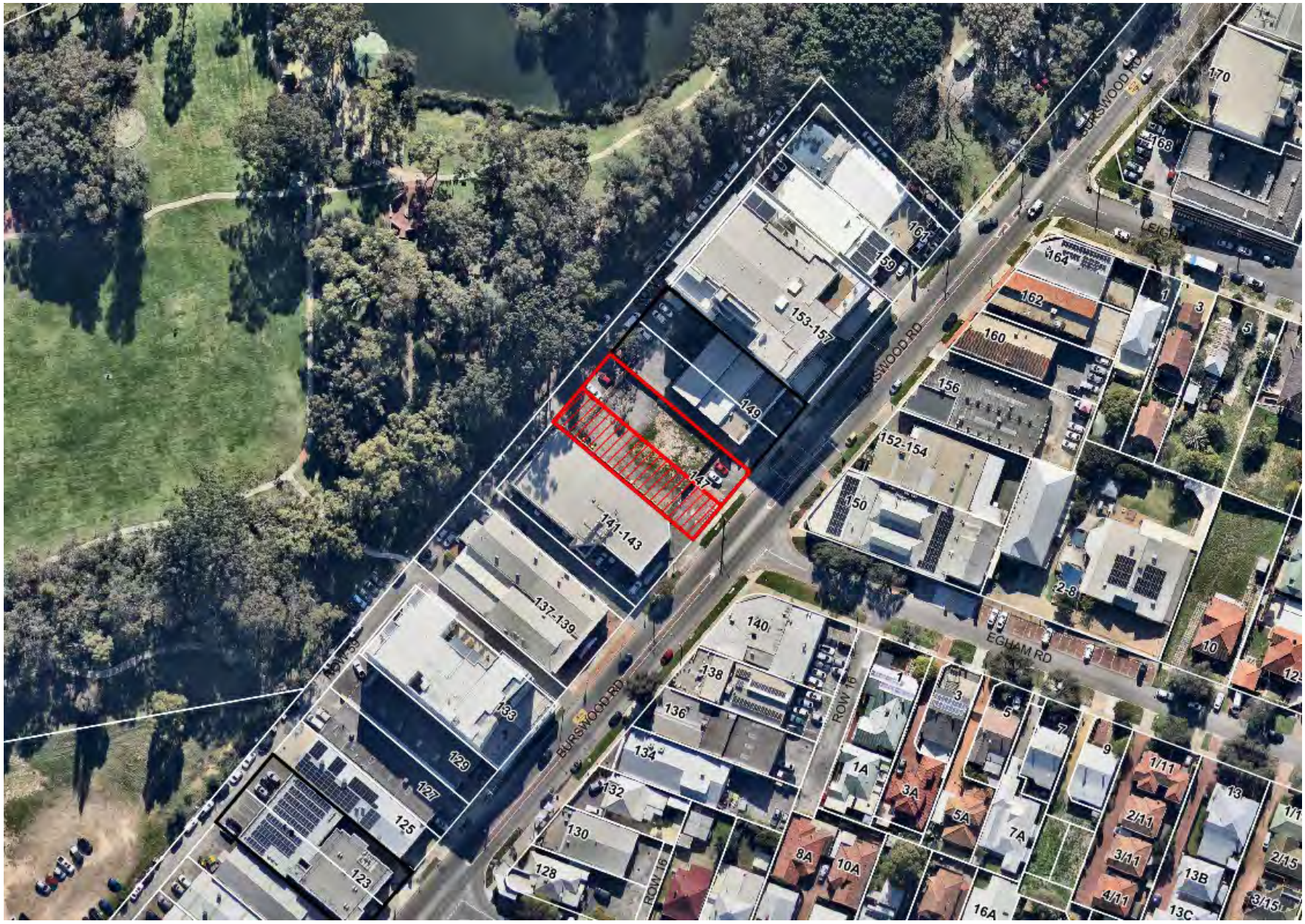
The Town's Officers are satisfied that relevant matters that need to be considered under clause 67 of the deemed provisions have been met such that the development is recommended for approval. Namely -

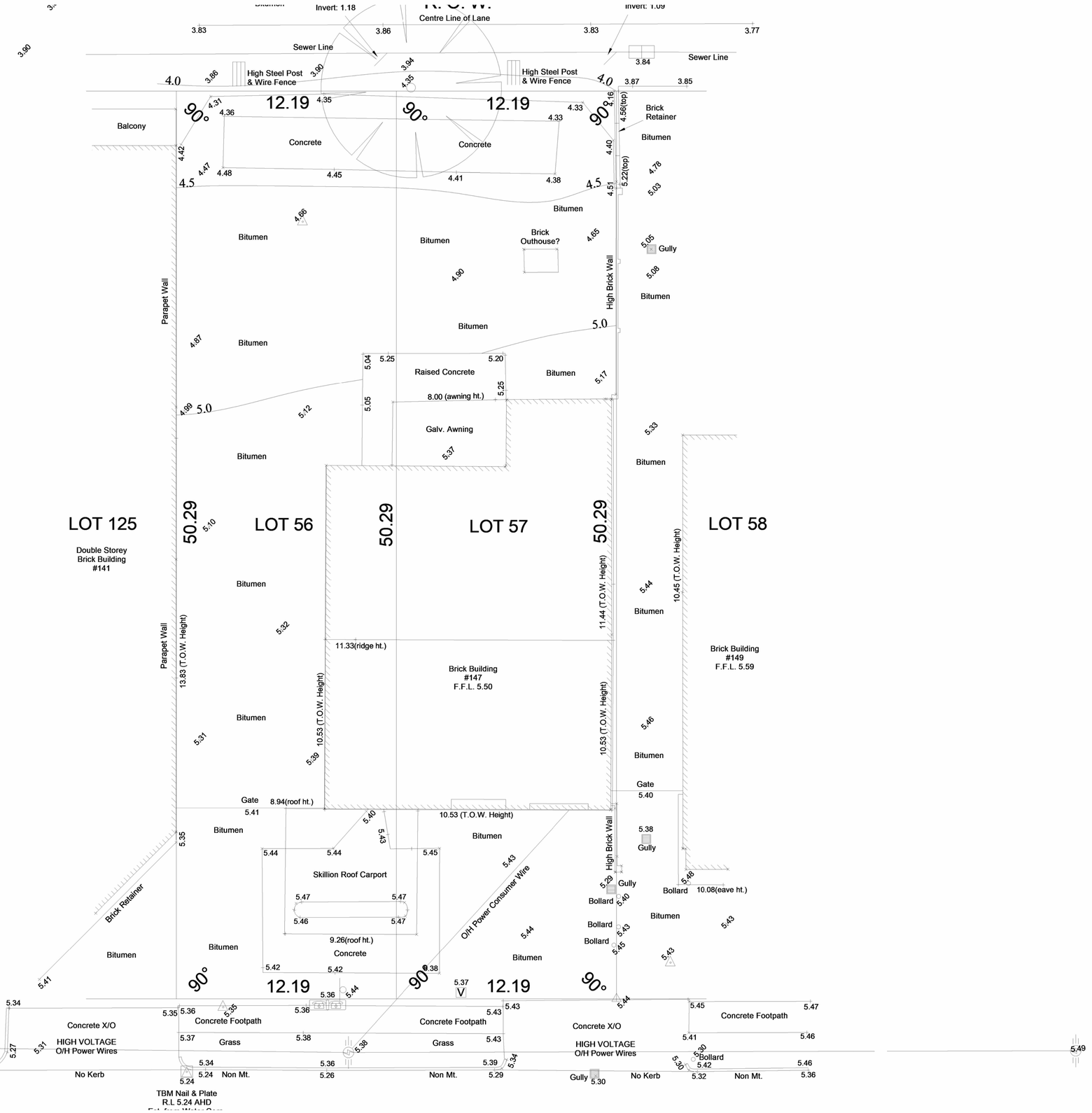
- The proposed development is generally in accordance with the aims and provisions of LPS2, relevant local planning instruments and orderly and proper planning.
- The proposed development is compatible with the desired future character of the Town and will improve the amenity of the locality. The delivery of a high quality development and provision of positive social impacts through increased commercial amenity, will make a positive contribution to Burswood Road and the laneway.
- The traffic impacts of the development are considered to be acceptable.
- Overall, the proposed development will have a positive impact on the Town's community, providing important amenity.

Conclusion:

Having regard to the provisions of the Scheme and relevant Local Planning Policies, it is considered that the use of the site as a Child Care and Offices is acceptable. In terms of potential amenity impacts resulting for this use, an assessment of the technical reports received in relation to traffic impact and noise impact has concluded that these impacts are acceptable.

On this basis it is recommended that the application be approved subject to conditions.


BURSWOOD RD
EGHAM RD
ROW 16
ROW 16
ROW 16
147
149
153-157
141-143
137-139
133
129
127
125
123
140
138
136
134
132
130
128
161
159
164
162
160
156
152-154
150
170
168
1
3
5
7
9
1A
3A
5A
7A
8A
10A
16A
1/11
2/11
3/11
4/11
13
13B
13C
2/15
3/15
10
12



SITE SURVEY

SCALE: 1 : 100

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

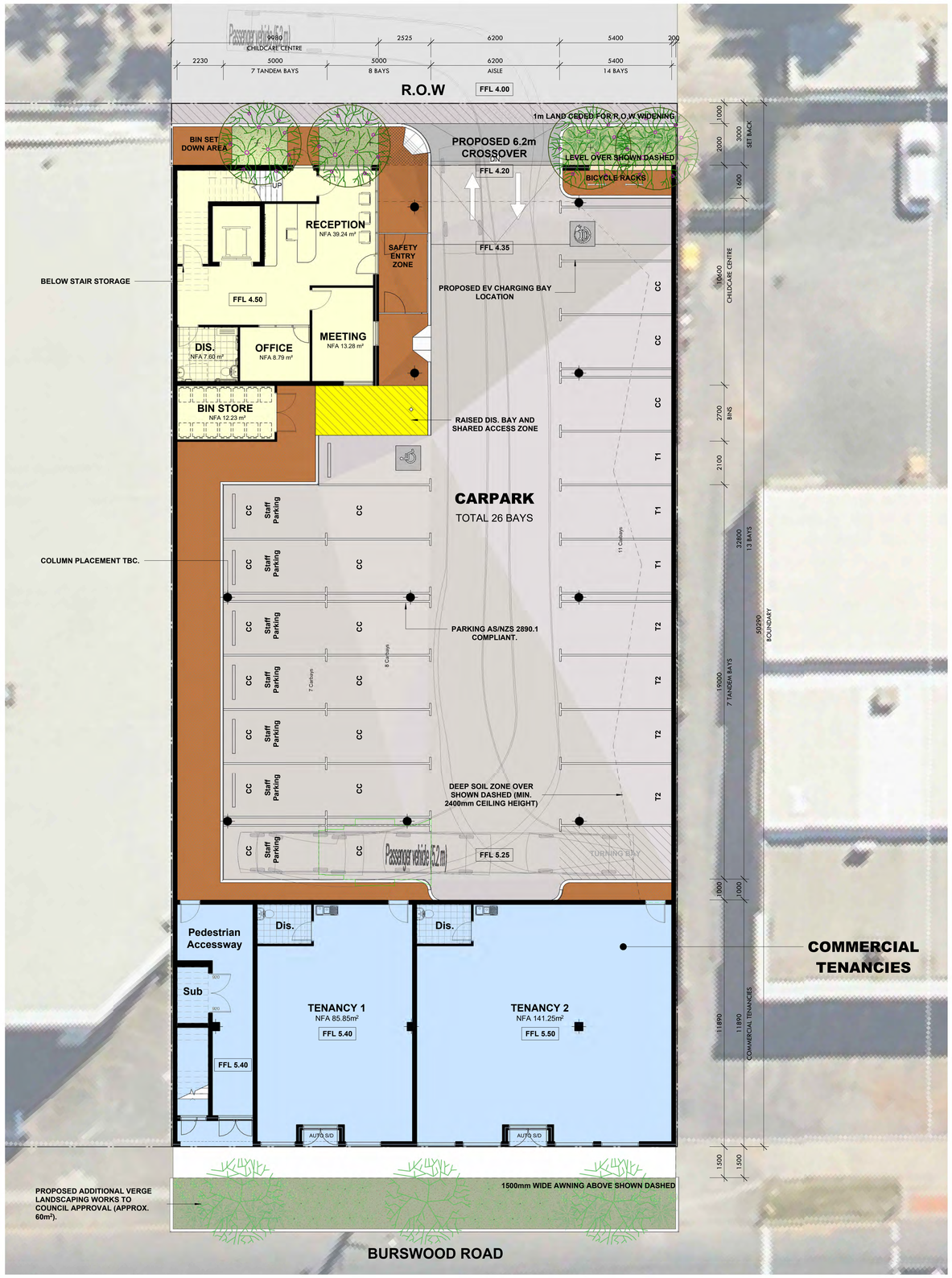
FOR : ELVEN PROPERTY

0 1 2 3 4 5 10

DATE:	AUG 2025
REVISION:	SK017
SHEET:	0000
SCALE:	1 : 100

PROJECT NUMBER **P22-8926**

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: mia@meyershircore.com.au



SITE PLAN & GROUND FLOOR PLAN

SCALE: 1 : 100



FIRST FLOOR PLAN

SCALE: 1 : 100

SITE CRITERIA

1. Site Area

	Total	**1226m²**

2. Floor Area (GFA)

a. Tenancy 1	85m²
b. Tenancy 2	141m²
d. Child Care	
i. Ground Floor	116m²
ii. First Floor	535m²
iii. Store	20m²
Total	**897m²**

ii. Cars Provided

Total Cars Provided	**28 Cars**

4. Landscaping

i. Ground Floor	26 Cars
ii. First Floor	**26 Cars**
Total	
	21m²
	425m2
	447m² (36.5%)

Landscaping
A. Hard Landscaping
Defined as paved walkways either open or covered.
B. Soft Landscaping
Defined as vegetative landscaping.

Gross Floor Area : GFA
A. All Floor Areas on this plan are shown as GROSS FLOOR AREA.
Unless otherwise noted as Nett Floor Area
B. Definition of Gross Floor Area is defined as:
i/ GROSS FLOOR AREA OF TENANCY:
Gross Floor Area of an individual Tenancy is defined as the area contained between the centre line of common tenancy walls and the outside edge of external walls.
ii/ GROSS FLOOR AREA OF A BUILDING:
Gross Floor Area of a Building is defined as the total area contained between the outside edge of external walls

Nett Floor Area : NFA
A. Nett Floor Area of a Tenancy on this plan is defined as the area between external or tenancy dividing walls.
B. This area is inclusive of toilets if the toilets are exclusive to the Tenancy.

CHILDCARE CENTRE

TOTAL 85 CHILDREN & 17 STAFF

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

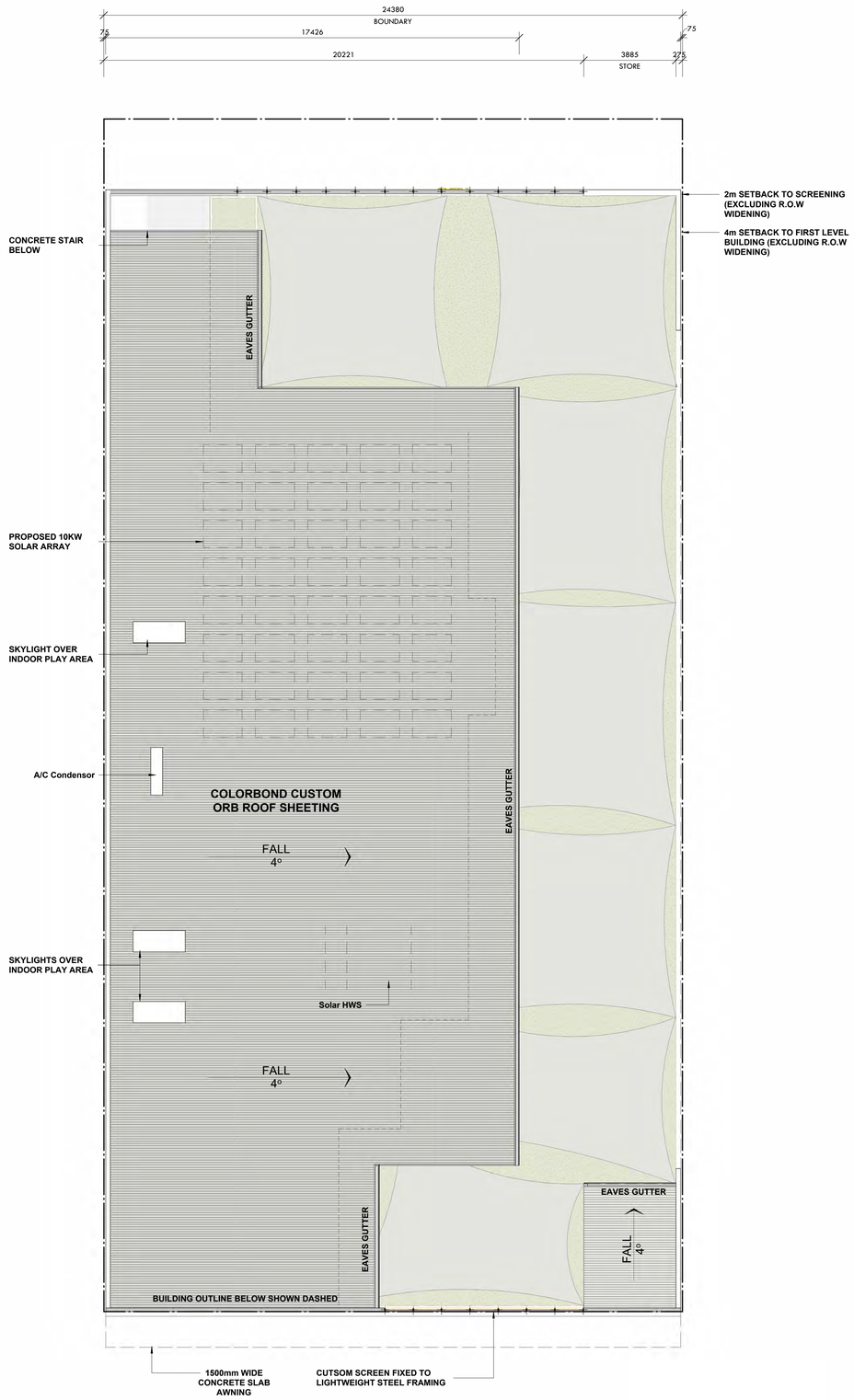
LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

0 1 2 3 4 5 10

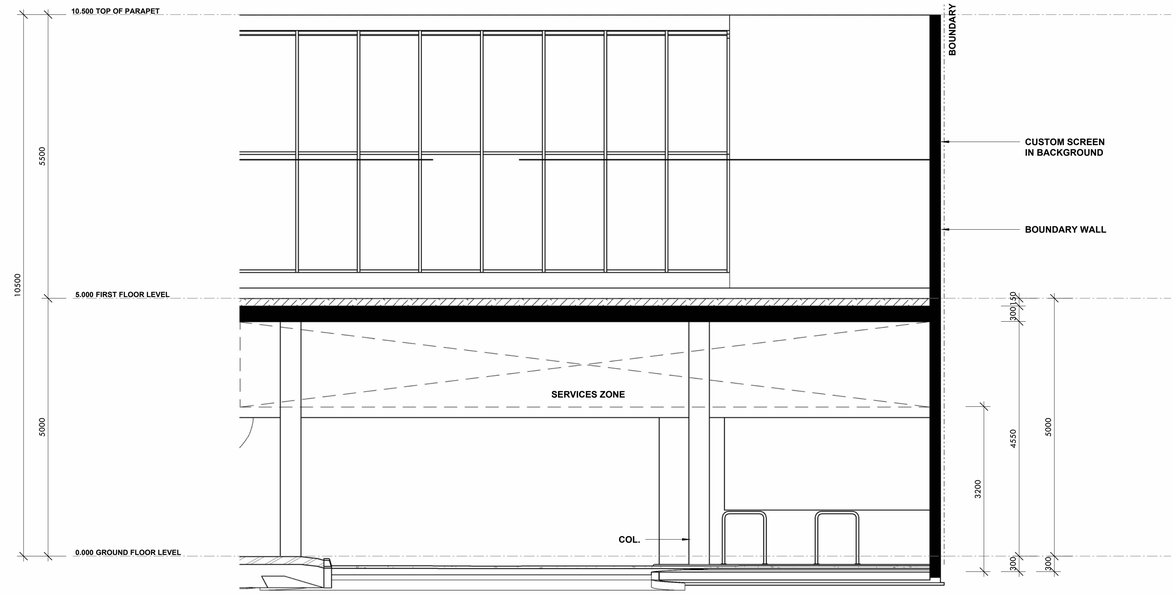
DATE:	AUG 2025	PROJECT NUMBER	
REVISION:	SK017	**P22-8926**	
SHEET:	A - 1000		
SCALE:	1 : 100 @B1		

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au



ROOF PLAN

SCALE: 1 : 100



DEEP SOIL ZONE SECTION

SCALE: 1 : 50

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

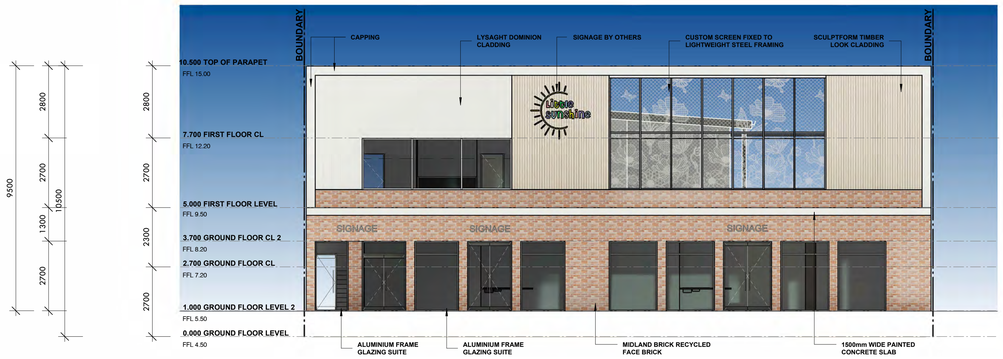
FOR : ELVEN PROPERTY

0 1 2 3 4 5 10

DATE: AUG 2025
REVISION: SK017
SHEET: A - 2000
SCALE: As indicated@B1

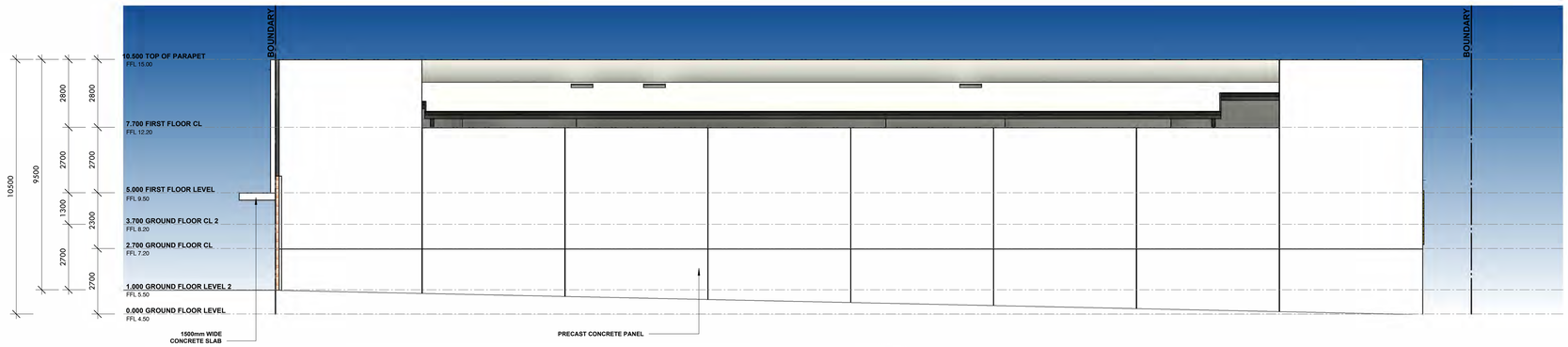
PROJECT NUMBER
P22-8926

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au



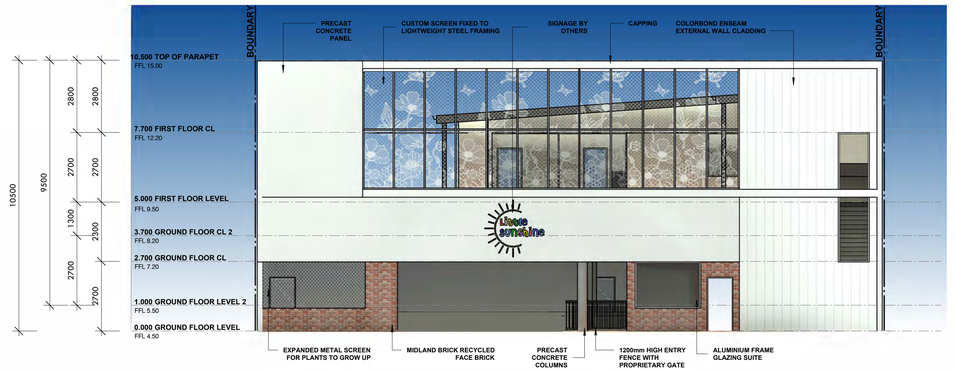
SOUTH ELEVATION (BURSWOOD ROAD)

SCALE: 1 : 100



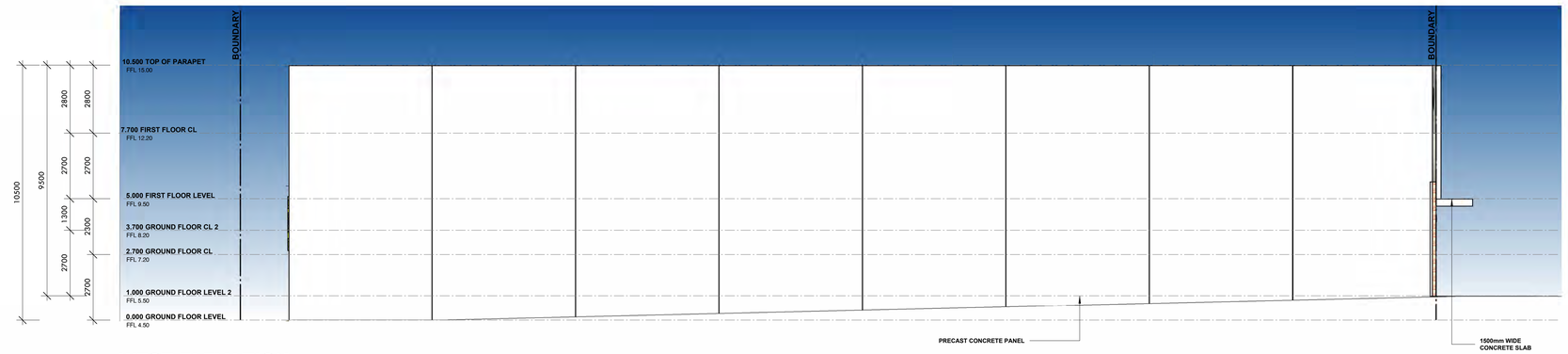
EAST ELEVATION

SCALE: 1 : 100



NORTH ELEVATION

SCALE: 1 : 100



WEST ELEVATION

SCALE: 1 : 100

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

0 1 2 3 4 5 10

DATE: AUG 2025

REVISION: SK017

SHEET: A - 3000

SCALE: 1 : 100 @B1

PROJECT NUMBER

P22-8926

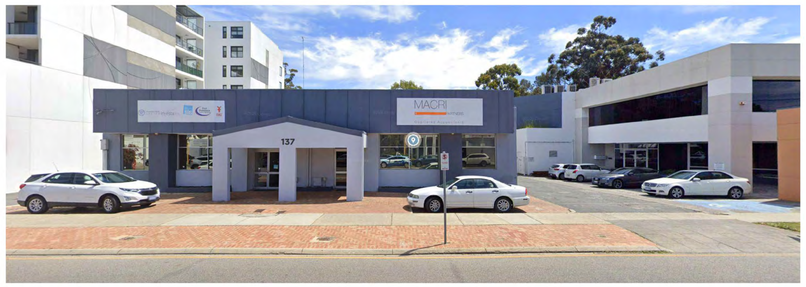
© Meyer Shircore & Associates

ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au



STREETSCAPE

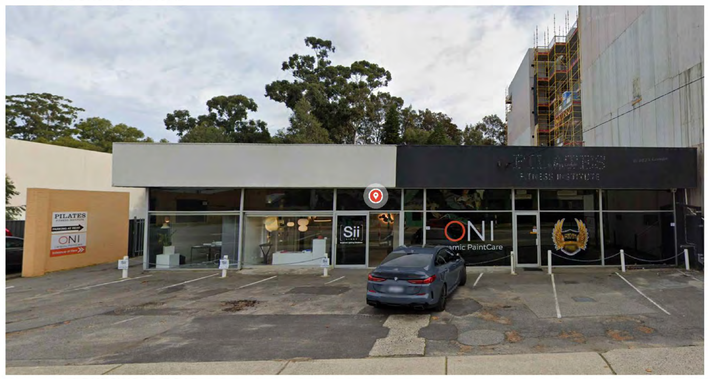
SCALE: 1 : 200



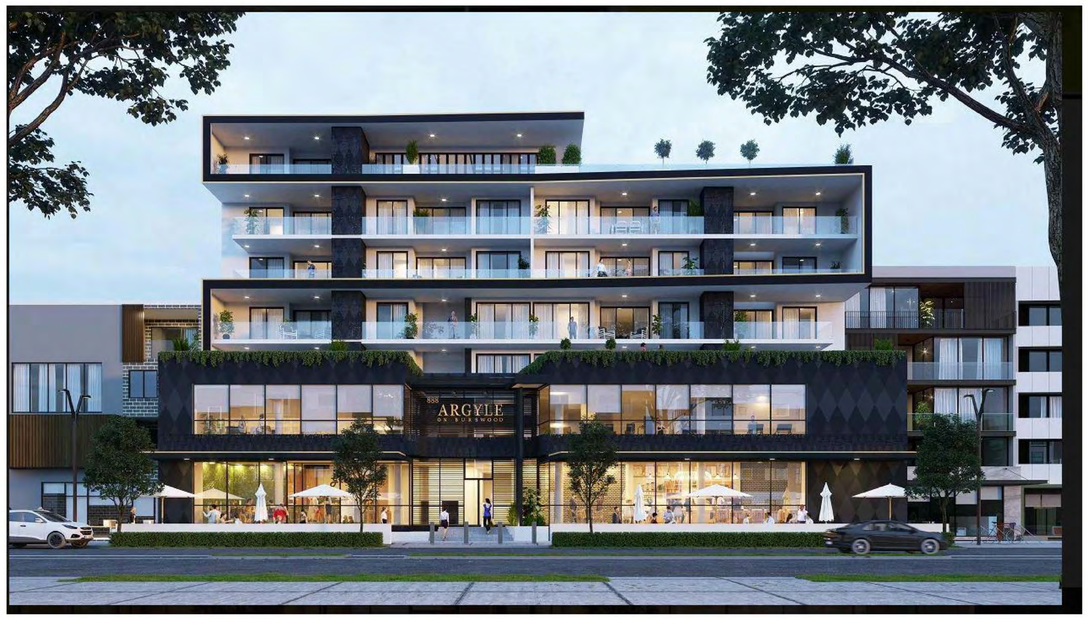
137 BURSWOOD ROAD



141 BURSWOOD ROAD



149 BURSWOOD ROAD



153 BURSWOOD ROAD

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

0 1 2 3 4 5 10

DATE: AUG 2025

REVISION: SK017

SHEET: A - 3001

SCALE: 1 : 200 @B1

PROJECT NUMBER

P22-8926

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au



BURSWOOD ROAD PERSPECTIVE 1



BURSWOOD ROAD PERSPECTIVE 1



LANEWAY PERSPECTIVE 1



LANEWAY PERSPECTIVE 2

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

DATE: AUG 2025
REVISION: SK017
SHEET: A - 4000
SCALE: @B1

PROJECT NUMBER
P22-8926

© Meyer Shircore & Associates
ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au

CUSTOM SCREEN CASE STUDIES

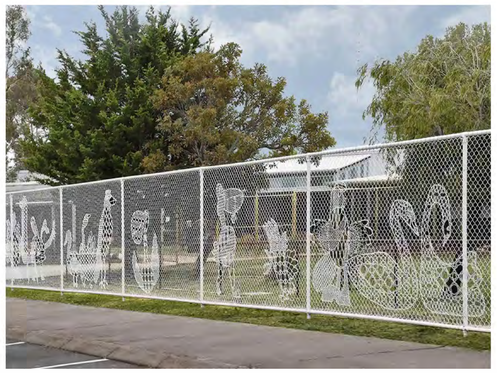




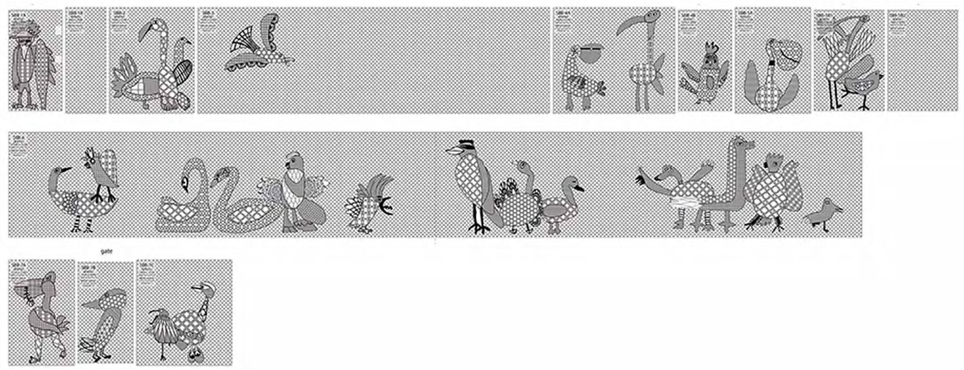


MOUNT PLEASANT WOOWORTHS

ARTIST: PAULA HART
SUPPLIER: REDFORT ARCHITECTURAL FABRICS (LACEFENCE)







SOUTH BUNBURY PRIMARY SCHOOL

ARTIST: PAULA HART
SUPPLIER: REDFORT ARCHITECTURAL FABRICS (LACEFENCE)



SCARBOROUGH PRIMARY SCHOOL

ARTIST: PAULA HART
LASER CUT PANELS







STAN AND JEAN PERRON CHILD ADVOCACY CENTRE MIDLAND

ARTIST: PAULA HART
LASER CUT PANELS

PRELIMINARY

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au



BURSWOOD ROAD



R.O.W

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

DATE: AUG 2025

REVISION: SK017

SHEET: A - 5001

SCALE: @B1

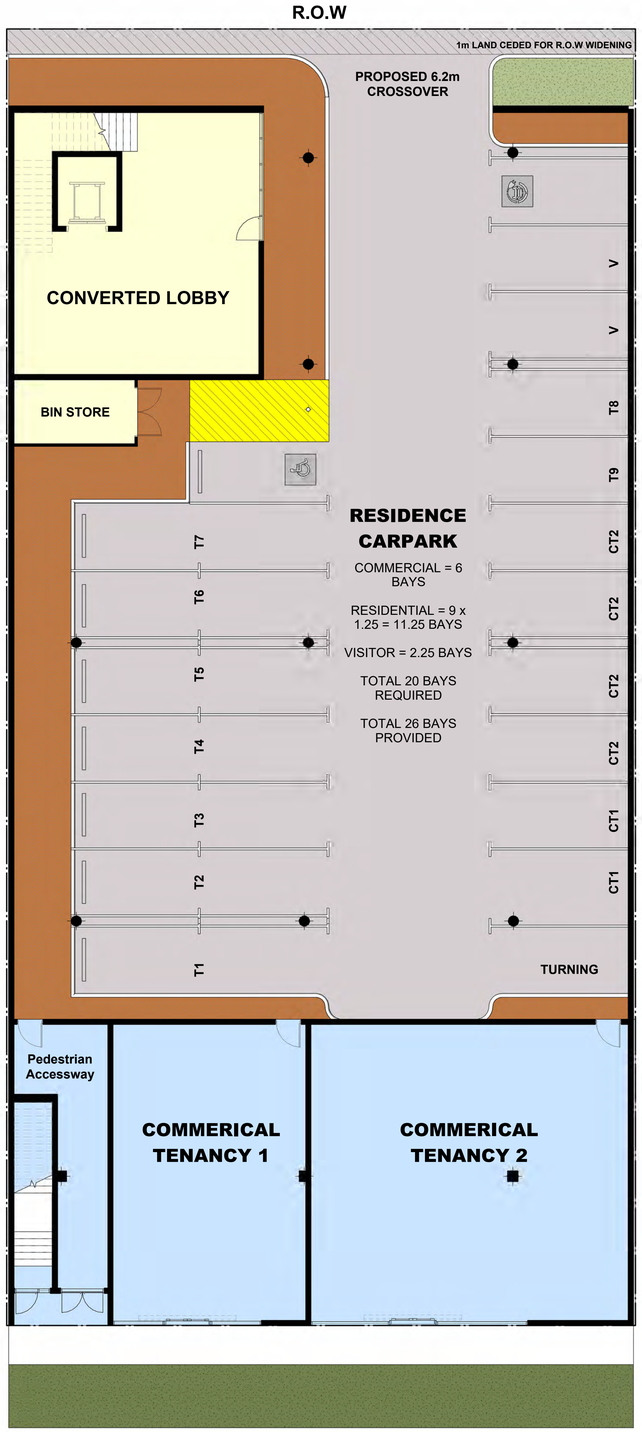
PROJECT NUMBER

P22-8926

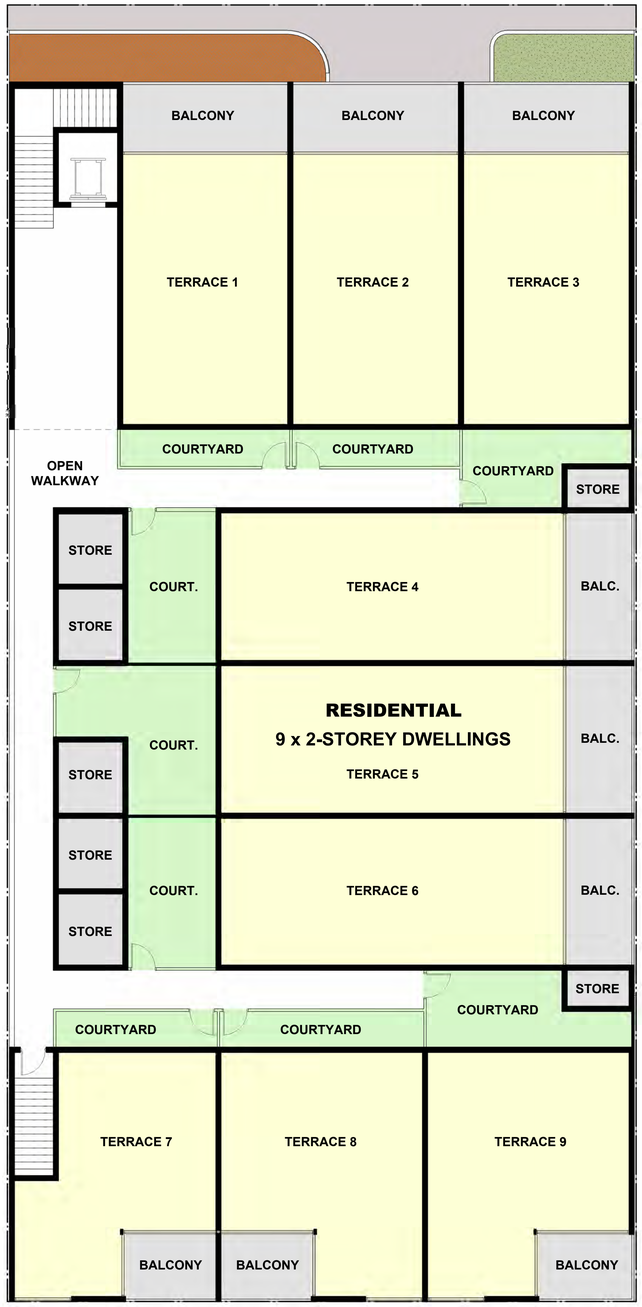
© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au

POTENTIAL FOR FUTURE RESIDENTIAL DEVELOPMENT

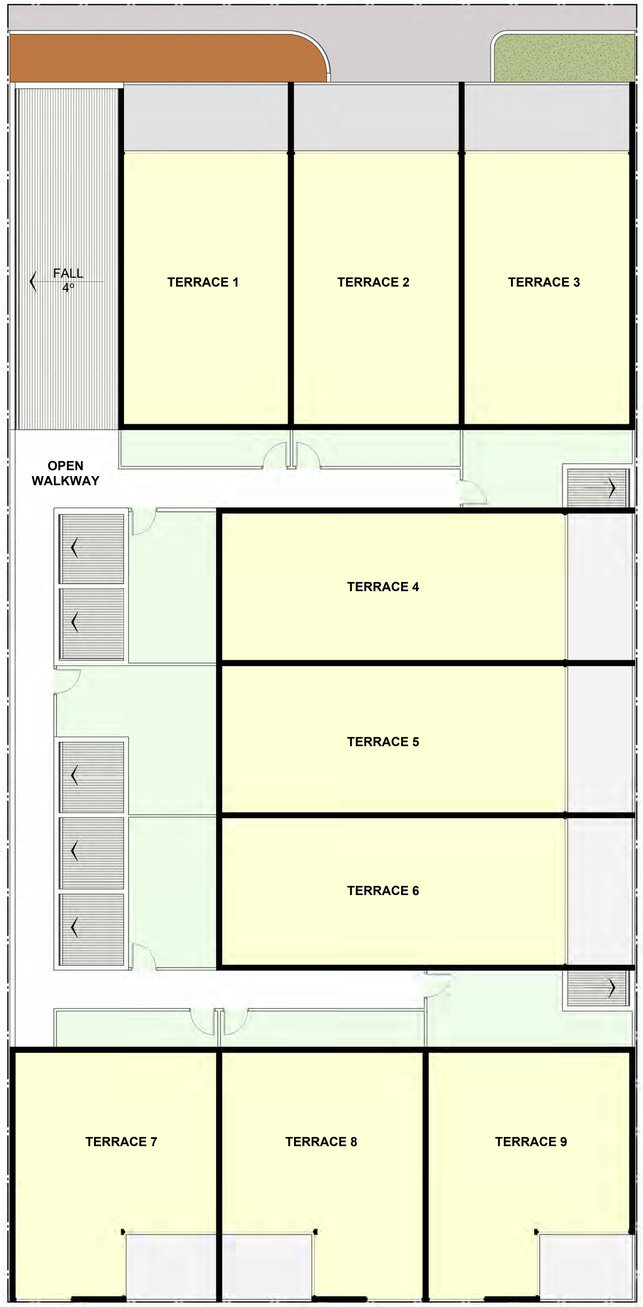
IT IS ACKNOWLEGDED THAT THE CAUSEWAY PRECINCT REVIEW BACKGROUND REPORT (2009) STATES THAT THE POLICY PROVISION REQUIRES A MANDATORY RESIDENTIAL FRONTAGE TO THE LANEWAY. ALTHOUGH THERE IS AN ABSENCE OF A RESIDENTIAL COMPONENT, THERE IS A POTENTIAL FOR REDEVELOPMENT OF THIS SITE IN FUTURE TO INCLUDE SUCH PROVISIONS WHICH HAS BEEN CONSIDERED IN THIS DESIGN AND DEMONSTRATED (INDICATIVE DESIGN ONLY).



SITE & GROUND FLOOR PLAN
SCALE: 1 : 100



FIRST FLOOR PLAN
SCALE: 1 : 100



SECOND FLOOR PLAN
SCALE: 1 : 100

NOTE: Number of terraces based on majority having 2 car parking bays. (7 of)

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

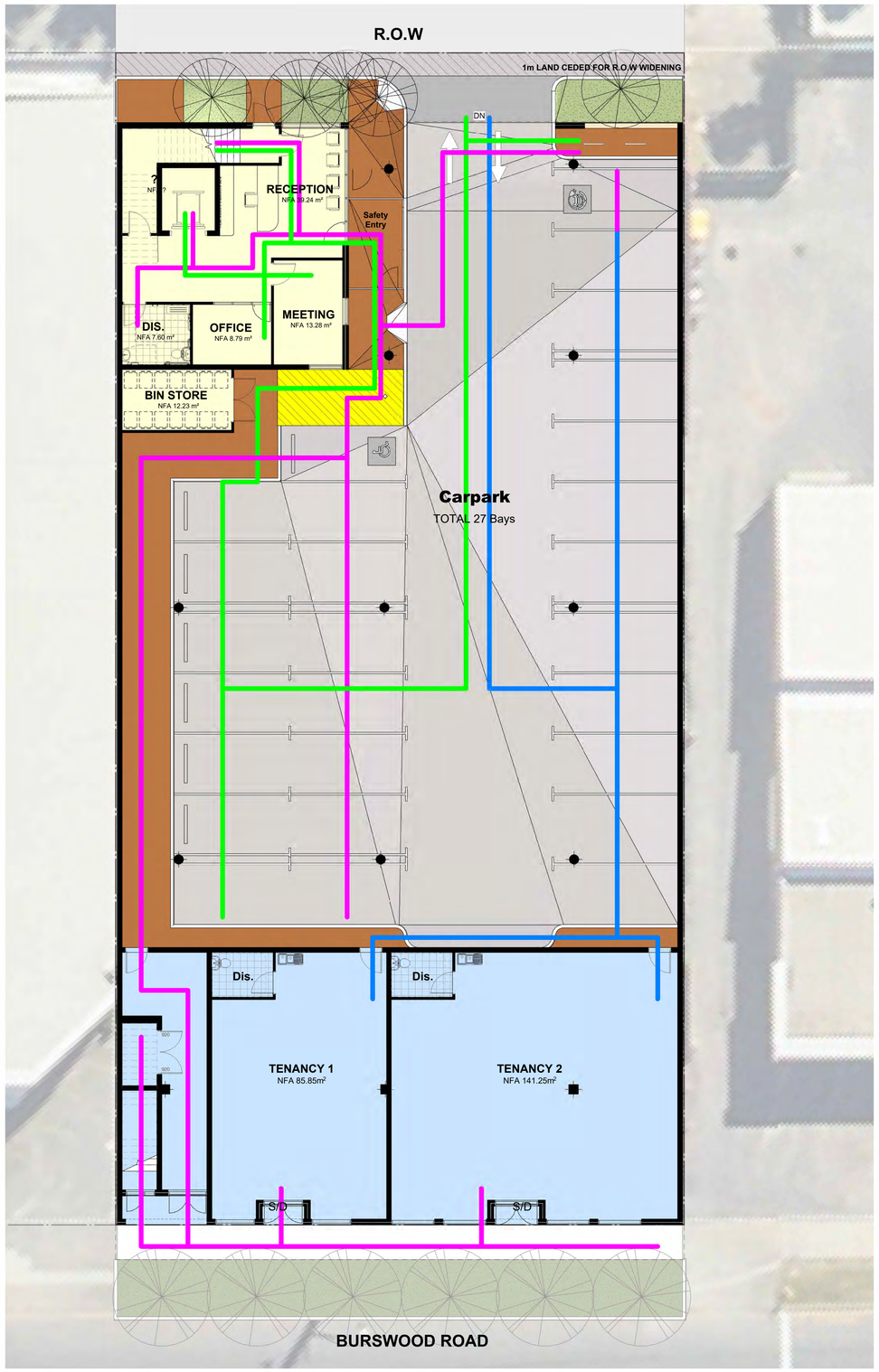
LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD
FOR : ELVEN PROPERTY

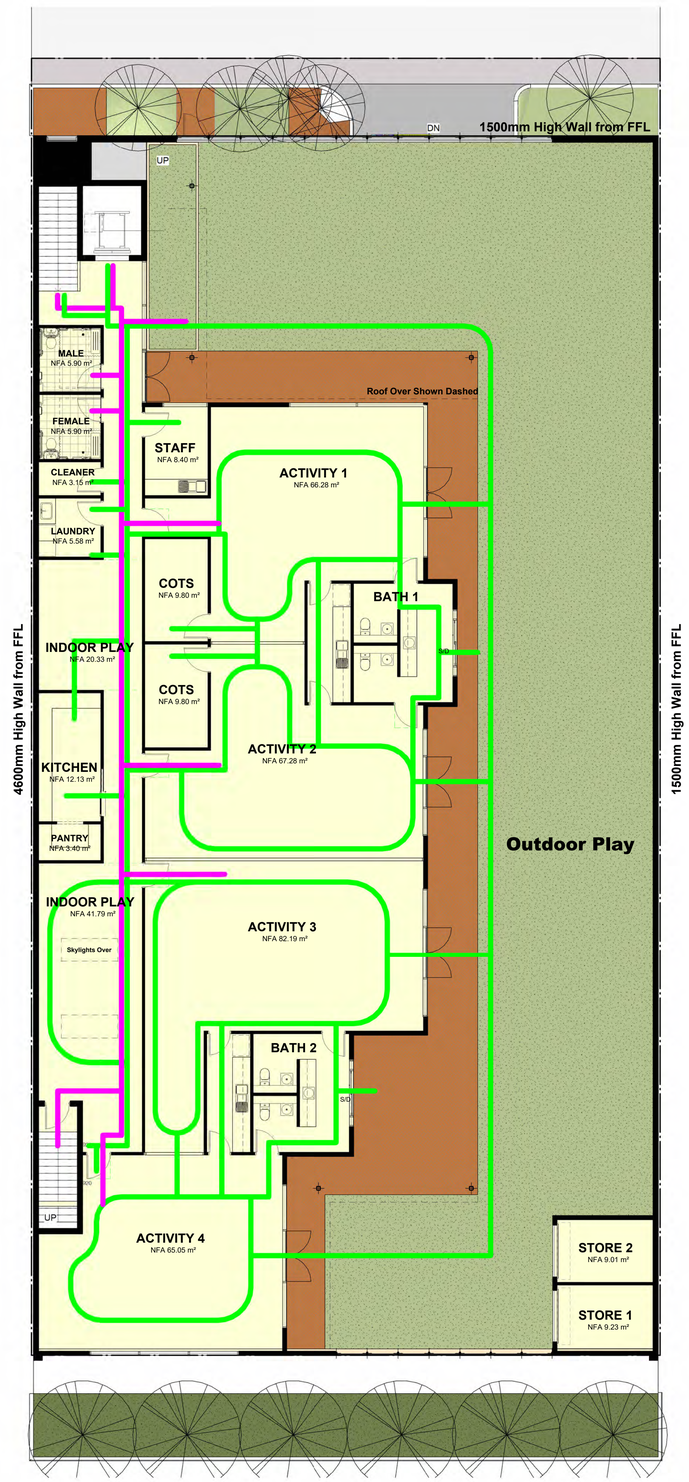
0 1 2 3 4 5 10

DATE: AUG 2025
REVISION: SK017
SHEET: A - 6000
SCALE: 1 : 100 @B1

PROJECT NUMBER
P22-8926

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au





STAFF

VISITORS

COMMERCIAL TENANCY

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

DATE: AUG 2025

REVISION: SK017

SHEET: A - 7000

SCALE: 1 : 100 @B1

PROJECT NUMBER

P22-8926

© Meyer Shircore & Associates ACN 115 189 216

Suite 2, Ground Floor 437 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: msa@meyershircore.com.au

Commercial Development

Lots 56 and 57 (No. 147) Burswood Road
Burswood

ROWE GROUP

OUR REF: 9855 19/04/2024

Document Control

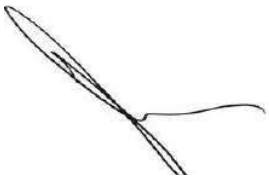
Printed 16 May 2025 9855_20240117_DA_ToVP_in

Version	File Name	Prepared	Approved	Date
1	9855_20240117_DA_ToVP_in	Nathan Stewart	Nathan Stewart	19/04/2024
2	9855_20240117_DA_ToVP_in_V2	Declan Allcock	Jeremy Hofland	16/5/2025

This report has been authorised by;



Declan Allcock
Assistant Town Planner



Jeremy Hofland
Associate | Principle Town Planner



Alexander Rojas
Quality Control

CONTACT ROWE GROUP

p 9221 1991 **e** info@rowegroup.com.au **w** rowegroup.com.au
a 3/369 Newcastle Street, Northbridge 6003

Although all care has been taken on the compilation of this document Greg Rowe Pty Ltd and all parties associated with its preparation disclaim any responsibility for any errors or omissions. The right is reserved to change this document at any time. This document does not constitute an invitation, agreement or contract (or any part thereof) of any kind whatsoever. Liability is expressly disclaimed by Greg Rowe Pty Ltd for any loss or damage which may be sustained by any person acting on this document.

© **2025** Greg Rowe Pty Ltd All Rights Reserved. Copyright in the whole and every part of this document belongs to Greg Rowe Pty Ltd and may not be used, sold, transferred, copied or reproduced in whole or in part in any manner or form or in or on any media to any person without the prior written consent of Greg Rowe Pty Ltd.

Contents

1. Introduction 3
2. Description of Site 4
2.1 Location 4
2.2 Cadastral Information 4
2.3 Existing Improvements 4
3. Description of Proposal 8
4. Pre-lodgement Engagement 9
4.1 Design Review Panel 9
5. Strategic Planning Considerations 13
5.1 Town of Victoria Park Local Planning Strategy 13
5.2 State Planning Policy 5.4 – Road and Rail Noise 14
5.3 State Planning Policy 7.0 – Design of the Built Environment 14
6. Statutory Planning Considerations 16
6.1 Zoning and Land Use Permissibility 16
6.1.1 Metropolitan Region Scheme 16
6.1.2 Town of Victoria Park Local Planning Scheme No. 2 16
6.2 Development Standards 19
6.2.1 Local Planning Policy No. 6 – Family Day Care and Child Care Premises 19
6.2.2 Local Planning Policy No. 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way 19
6.2.3 Local Planning Policy No. 22 – Development Standards For Causeway Precinct 19
6.2.4 Local Planning Policy No. 23 – Bicycle Parking, Car Parking and Access for Non-Residential Development 20
6.2.5 Local Planning Policy No. 38 – Signs 20
6.2.6 Local Planning Policy No. 45 – Tree Planting for Non-Residential Development 20
6.2.7 Local Planning Policy No. 46 – Sustainable Development 21
7. Technical Considerations 22
7.1 Sustainable Design 22
7.2 Noise 22

7.3 Traffic 22
7.4 Waste Management 22
7.5 Stormwater 22
7.6 Site Contamination 22
8. Conclusion 24

Figures

1. Regional Location 5
2. Local Context 6
3. Site Plan 7
4. Metropolitan Region Scheme Mapping 17
5. Town of Victoria Park Local Planning Scheme No. 2 Zoning 18

Attachments

1. Certificates of Title
2. Development Plans
3. Landscape Plan
4. Sustainable Design Assessment Report
5. Energy Efficiency Report
6. Assessment of Proposed Development Against the Relevant Provisions
7. Noise Assessment
8. Transport Impact Statement
9. Waste Management Plan
10. Stormwater Drainage Plan
11. Due Diligence Contamination Investigation

1. Introduction

Rowe Group acts on behalf of the landowner of Lot 56 and 57 (No. 147) Burswood Road, Burswood WA (**the subject site or site**). This report has been prepared in support of a Development Application (**Application**) for a two (2) storey Mixed Use Childcare Development at the site.

This Report includes a description of the following matters:

- The location of the subject site;
- A description of the existing site characteristics;
- A detailed explanation of the proposed development;
- An overview of the relevant planning issues; and
- Justification for the proposed development.

This Application has been prepared with detailed technical input from a consultant team comprising of:

- Meyer Shircore Architects – Project Architect;
- Rowe Group – Town Planning;
- Shawmac Consulting Civil and Traffic Engineers – Traffic and Parking;
- Lloyd George Acoustics – Acoustic and Noise Management;
- Urban Retreat Garden Design – Landscape Design;
- Talis – Waste Management;
- Green Start Consulting – Ecological Sustainable Design;
- Structerre Consulting Engineers – Stormwater Design and Management;
- West Soil & Water – Site Contamination
- Little Sunshine – Childcare Operator.
- Full Circle Design Services – Engineering (inc. Sustainable Design) Consulting

This Application is made under the *Planning and Development (Development Assessment Panels) Regulations 2015* (**DAP Regulations**). The development has an estimated construction value exceeding $2 million, and therefore meets the criteria to nominate the Application to be determined by the Metro Inner-South Joint Development Assessment Panel (**JDAP**).

2. Description of Site

2.1 Location

The subject site is located in the municipality of the Town of Victoria Park (**the Town**), approximately 3km east of the Perth Central Area.

Refer **Figure 1 – Regional Location**.

The subject site is situated in the suburb of Burswood and is bound by Burswood Road to the southeast, GO Edwards Park to the northwest and commercial tenancies on either side.

The subject site is located within a commercial strip, surrounded by residential development to the southeast.

The subject site is easily accessible via Great Eastern Highway, Graham Farmer Freeway and Shepperton Road.

The subject site is well serviced by public transport, serviced by Burswood train station to the north east. The site is also located between numerous schools including Perth Montessori, Victoria Park Primary School, Ursula Frayne Catholic College and Lathlain Primary School.

Refer **Figure 2 – Local Location**.

2.2 Cadastral Information

The subject site comprises two (2) land parcels, legally described as:

- Lot 56 On Plan 2772 Certificate of Title Volume 1075 Folio 424; and
- Lot 57 On Plan 2772 Certificate of Title Volume 1075 Folio 425.

The subject site has a total land area of 1,226m^2, with a frontage of 24.38m to Burswood Road.

Refer **Figure 3 – Site Plan** and **Attachment 1 – Certificates of Title**.

2.3 Existing Improvements

The subject site is currently vacant of any development and vegetation. There is existing hardstand over most of the subject site.



0 4000m

SCALE@A4 1:125,000

FIGURE 1
REGIONAL LOCATION



0 400m

SCALE @ A4 1:12,500

FIGURE 2

LOCAL CONTEXT



FIGURE 3
SITE PLAN

3. Description of Proposal

This Application seeks Development Approval for the construction of a two (2) storey commercial development, incorporating two ground floor office tenancies and a first-floor childcare centre at the subject site.

The proposed development will utilise the existing rear lane for vehicle access into the subject site. The proposed development will comprise the following:

- Ground floor includes;
  - A commercial tenancy space of 85m^2 with access to car park;
  - A commercial tenancy space of 141m^2 and access to car park;
  - The childcare centre entry area on the ground floor including a reception, meeting room and associated services that total 116m^2;
  - 26 car parking bays, including the following;
    - One (1) ACROD bay;
    - One (1) EV charging bay;
    - 14 tandem bays; and
    - Ten (10) standard parking bays.
  - Four (4) bicycle parking spaces.
- First floor includes;
  - The childcare centre of 535m^2 including the following;
    - Four (4) activity rooms;
    - Associated bathrooms, kitchen, laundry, storage, stair and lift access and servicing; and
    - An outdoor play area of 553m^2.

Landscaping is proposed between the building and the laneway and on the first-floor outdoor play space. Verge landscaping on Burswood Road is also proposed.

Refer **Attachment 2 – Development Plans** and **Attachment 3 – Landscape Plan**.

The childcare centre is proposed to facilitate:

- A maximum of 85 children;
- A total of 17 staff on-site at any one time; and
- Operate between the hours of 6:30am to 6:30pm from Monday to Friday.

This proposal also includes signage panels for tenants.

4. Pre-lodgement Engagement

4.1 Design Review Panel

On 11 October 2023, the proposed development was presented to the Town's Design Review Panel (**DRP**). The following comments were made, and the key aspects are summarised in the table below, along with the applicants' responses.

	DRP Recommendations	Applicant Response
Principle 1: Context and Character		
1.	Revise the childcare pedestrian entry to Burswood Road and propose dual access to both laneway and Burswood Road.	A pedestrian accessway is proposed along the western boundary of the subject site which provides access from Burswood Road.
2.	The design needs a better street entry presence/interface to the laneway as the current design offers little in the way of activation (50% of the ground floor dedicated to parking and access; whole upper floor comprises blank wall to laneway).	The proposed development has been modified to incorporate custom screening on the first floor which provides transparency and visual interest. At ground level, there is a combination of metal screening, concrete panels and glazing. As with similar approved development in the area, no footpath is provided to the laneway.
3.	Policy requirement for mandatory residential development to the laneway frontage has not been addressed.	It should be noted that the mandatory residential frontage to the "mini-street and park" is capable of being varied under Clause 29 of the Town's Local Planning Scheme No. 1 (**LPS1**). This is not a binding requirement.
4.	Look at adaptability of the building, particularly if the intent may be for the future adaptation of the building as part of a redevelopment of the site. Consider future proofing the development to the standards of the current **SPP 7.3 Vol 2.**	The adaptability of the proposed building for future residential development has been considered in the design of the building. As demonstrated in the enclosed architectural drawings, the childcare centre could be removed and replaced with residential development in the future. Refer **Attachment 2 – Architectural Drawings**.
Principle 2: Landscape Quality		
1.	Proposed Landscaping in the outdoor play space presents as green washing. No details regarding the landscaping, is Astro Turf proposed to the upper floor plays space?	Urban Retreat Garden Design has been engaged to prepare a landscape plan to support the proposed development. The outdoor play spaces will incorporate grass.
2.	No deep soil planting proposed on the lower floor – no problems. However, need to work harder with landscaping fronting the laneway.	The amount of landscaping between the building and the laneway has been increased. Additionally, deep soil planting is proposed on the first floor, outdoor child playspace.

	DRP Recommendations	Applicant Response
3.	To achieve a biophilic design along the laneway frontage there needs to more work undertaken to ensure the suitability of the landscaping treatments and its longevity.	The tree species nominated on the landscape plan are taken from the Town of Victoria Park Suggested Tree Species List.
Principle 3: Built Form and Scale		
1.	Internal layout – internal corridors on the upper floor are narrow and tight.	The width of the internal access ways are considered to be sufficiently wide enough for this proposed development.
2.	The first-floor wall height to the east and south is nominated as 1.5m. Would be better to increase to a two storey wall height, particularly the potential for future development of the property to the east with a building of two or more storeys in close proximity to the boundary.	At the side boundaries, the proposed development has the appearance of a two storey building. There are openings in the north and south elevations to allow visibility out of the first floor play space area.
3.	Treat the whole building as a 2-storey building, rather than being open for the majority of the upper floor.	Refer above.
Principle 4: Functionality and Build Quality		
1.	Lack of shading provided to upper floor play space of the childcare centre.	As indicated on the landscape plan, there will be shading devices installed within the play space area. Refer **Attachment 3 – Landscape Plan**.
2.	The hit and miss brick (with glass screening behind) provides little ventilation into the building.	The glass screening has been replaced with a metal screen to allow ventilation.
3.	Need to see proof that the swept path movement for the proposed tandem bays can be achieved. Wheel stops will need to be provided.	Appendix A of the Transport Impact Statement (Attachment 7) demonstrates that the swept path movements for the tandem bays is achieved.
4.	Location of bike racks propose an obstruction to the footpath into childcare centre.	The bicycle parking has been relocated to avoid any conflict with the footpath entrance into the childcare centre.
5.	Provide evidence that a disabled bay can also be used as a footpath	The architectural drawings indicate a flush kerb around the shared space adjoining the ACROD bay.
6.	Can't see how the carparking works with the intended use of childcare centre, the carparking needs to be reviewed in regards to the functionality with its use.	Car parking bay will be shared between the ground floor commercial uses and the first floor childcare centre.
7.	It appears that the carpark will need to be mechanically ventilated - please take into account the height requirements for air ducts and other required services.	The architectural drawings include a cross section of the car park to demonstrate the location of any mechanical plant.
8.	Think about the lift location to help dual access and make it less hidden from the childcare entry/reception area. If the lift fails or is not in service, you need to go outside to enter the upstairs childcare.	There are two stairs providing access to the childcare centre. The stairs are access from inside of the building.
9.	Would like to see testing on how much cross-ventilation and solar access is provided for the upper floor.	An Energy Efficiency Report has been prepared by Green Start Consulting demonstrating compliance with Section J of the National Construction Codes.

DRP Recommendations		Applicant Response
		Refer **Attachment 4 – Energy Efficiency Report**.
Principle 5: Sustainability		
1.	No sustainability information available.	An Energy Efficiency Report has been prepared by Green Start Consulting demonstrating compliance with Section J of the National Construction Codes. Refer **Attachment 4 – Energy Efficiency Report**.
2.	EV charging station should be looked at in terms of sustainability.	An EV charging bay has been included in the car park.
3.	Consider solar panels on the roof.	A 10KW solar array system will be installed on the roof of the building.
Principle 6: Amenity		
1.	Lack of shading provided to upper floor play space of the childcare centre.	As indicated on the landscape plan, there will be shading devices installed within the play space area. Refer **Attachment 3 – Landscape Plan**.
Principle 7: Safety and Community		
1.	Aspiration of the Towns Policies is to have passive surveillance to the laneway and provide an activated frontage. The proposed development is not meeting those requirements.	The proposed development has been modified to include a large window form the ground floor reception area of the childcare centre which provides sightlines to the rear laneway.
2.	The childcare needs a presence of a 2-storey building to provide adequate passive surveillance both to the laneway and Burswood Road, which the current design is lacking.	The proposed first floor childcare centre includes large portions of the outdoor play and activity rooms which provide passive surveillance to Burswood Road and the laneway.
3.	Proposed solid walls fronting the laneway contrary to safety and security principles.	The proposed development has been modified to include a large window form the ground floor reception area of the childcare centre which provides sightlines to the rear laneway. Additionally, the development will incorporate security lighting and a CCTV system. These systems are considered adequate for the proposed development.
Principle 8: Aesthetics		
1.	The development needs identity, it feels brutal, has no playfulness and does not have an enticing presence to its streetscapes.	The Burswood Road elevation incorporates large ground floor and first floor windows overlooking the street. An awning over the adjoining footpath on Burswood Road provides a human scale to the street.

	DRP Recommendations	Applicant Response
2.	Don't focus on design with its site context - focus on the design of the development proposing a new and exciting land use of a childcare centre to the area and having a bit of fun with the design.	Whilst the building has been designed with the site context in mind, the outdoor playspace has been designed with children in mind. Play equipment is integrated with the landscaped areas/vegetation. Additionally, fruit trees are incorporated into the playspace to encourage outdoor play.
3.	The awning proposed along the facade fronting Burswood Road feels heavy in appearance and could be lighter in weight.	The awning design has been modified to incorporate timer soffit material and a 'kink' to create visual interest at street level.
4.	The childcare wants to connect kids with nature, yet a solid brick wall is proposed to the parklands providing zero interface to the ROW and view of G.O. Edwards Park. The frontage to the laneway should be open to view.	A large metal screen is now proposed to the rear of the building to provide an opening for children to look out over the parkland and laneway.

Table 1: DRP 1 Comments and Design Response

5. Strategic Planning Considerations

5.1 Town of Victoria Park Local Planning Strategy

The City's Local Planning Strategy (**Strategy**) was endorsed by the Western Australian Planning Commission (**WAPC**) on 31 May 2022. The Strategy highlights that primary schools are nearing full capacity, and as the Town continues to grow, there is anticipated demand for additional primary schools to accommodate the rising number of dwellings, projected population growth, and student enrolment.

The Strategy demonstrates how the Town will accommodate an additional 18,000 dwellings by 2050. In 2021, the Town has approximately 38,300 residents and the population is anticipated to grow to 53,000 by 2041. There will be a need for additional community services such as childcare centres within the Town to facilitate this estimated population growth.

According to the Australian Bureau of Statistics (**ABS**), there are 409 children (aged between 0 and 4 years old) residing within the suburbs of Victoria Park, Burswood and Lathlain (Statistical Area Level 2 – Region Code 506021123). Within this same area, there are two childcare centres that offer all day care (the same level proposed by this development). There are 161 approved childcare places at these two centres. These centres are located at Lot 888 (No. 10) Oswald Street, Victoria Park and Lot 59 (No. 12) Lathlain Place, Lathlain. This means that in 2022, the place to child ratio is 2.5 children for every approved place. Access to childcare centre services is considered scarce where there are more than three children per childcare place or less than 0.333 places per child aged four and under[1].

In addition, Colliers issued a Childcare Market Update for Western Australia 2024[2] states that a total population of approximately 169,100 was recorded for children under the age of four in WA in the year to June 2023 and that demand for childcare facilities is likely to heighten as population for this age cohort is forecast to grow by 6.55 by 2031 in WA. The Colliers Childcare Market Update indicates that the reasons for increased child attendance at care services is likely from the following factors:

- Rise in female workforce and participation rate – The latest ABS statistics depict the female participation rate in WA to be 64.1% as at January 2024. This reflects the highest female participation rate in Australia. With both parents working, the total number of hours children attend per week has grown by 1.6% in the 12 months to September 2023. This had driven further demand and industry revenue, as well as aided in establishing new developments.
- Strong population projections – The total number of babies and pre-schoolers (0-4 years of age) in WA is expected to grow by 22.5% between 2023 and 2041. This growth will increase demand for childcare services.

There are no existing child care centres situated in the immediate locality of the subject site. The existing childcare centres located in this statistical area are located in the suburbs of Lathlain and Victoria Park.

Based on the ABS data, there is a current demand for additional childcare services in the locality and with the anticipated population growth in the Town, this demand is likely to increase. In this regard, the proposal is required to address the evolving needs of the community.

---

[1] Hurley, P., Matthews, H., and Pennicuik, S. (2022). *Deserts and Oasis: How accessible is childcare in Australia?* Mitchell Institute, Victoria University.
[2] Colliers. (2024). *Childcare Market Update Western Australia 2024*.

5.2 State Planning Policy 5.4 – Road and Rail Noise

State Planning Policy 5.4 – Road and Rail Noise (**SPP 5.4**) applies where a noise sensitive land use is proposed within proximity to major transport and freight corridors. Under SPP 5.4 a childcare centre is considered a sensitive land use and will be affected by Great Eastern Highway, a primary regional road.

A Noise Assessment has been prepared by Lloyd George Acoustics which indicates that the proposed development complies with the provisions of SPP 5.4. In this regard, the Noise Assessment concludes that glazing construction shall be reviewed for the sensitive areas within the childcare centre during the detailed design stage and prior to a building permit. Noise to the outdoor play spaces is compliant.

Refer **Attachment 5 – Noise Assessment**.

5.3 State Planning Policy 7.0 – Design of the Built Environment

State Planning Policy 7.0 – Design of the Built Environment (**SPP 7.0**) provides the broad framework for the design of the built environment across Western Australia. The design has considered and responded to the ten (10) design principles, with this demonstrated below.

Design Principle	Design Response
Context and character	The surrounding area is characterised by older commercial tenancies along Burswood Road and few modern multi-residential developments. The land opposite the laneway is G.O. Edwards, Charles Paterson Park and the Swan River. The proposed development ensures a contemporary commercial design that reflects the local vernacular of the surrounding environment.
Landscape quality	It is common for commercial development along Burswood Road to have minimal landscaping, with most presenting landscaping strips along the verge. The proposed intends to reflect this trend. There are two landscaped areas between the building and the laneway. The first floor childcare play space will be extensively landscaped. The landscaped areas have been designed by a qualified landscape architect.
Built form and scale	Multiple site options have been considered through the design development of this site. The scale of the proposed development ensures a sympathetic outcome to neighbouring built form through building height, street frontage, materiality and roof design.
Functionality and build quality	The proposed development incorporates a purpose-built childcare centre project with ground floor commercial tenancies providing street activation and façade. The specified materials are deemed to be durable and fit for purpose. The colour scheme is purposefully neutral to interface with the existing environment.
Sustainability	Natural light and ventilation are provided to the north and south facades through the use of metal screens. Skylight windows are additionally applied over the indoor play spaces. All windows are operable for natural ventilation. A 10KW solar array and rainwater collection is intended to be incorporated into the development.
Amenity	The design aims to create a beneficial facility for the area – a community service. The childcare centre facility will offer convenience for residents and young families who reside in the existing residential area as well as the new residential development on Burswood Road. Adequate car and bicycle parking is provided and there is easy access to existing public transport services in the area. A positive streetscape outcome is provided through the provision of the wide awning over the adjoining footpath and the building provides an amenity consistent with the surrounding area.
Legibility	Parking is accessible via the rear laneway which is an appropriate planning outcome for both the laneway and Burswood Road. Whilst the childcare entrance is from the rear of the building, there is pedestrian access provided via both the laneway and Burswood Road (through an entry

Design Principle	Design Response
	adjacent to Tenancy 1). Tandem parking spaces are provided. The intent is that the tandem bays are to be used for staff of the childcare centre.
Safety	Safe movement of staff, children and visitors has been considered in the design of the building. CPTED principles have been applied throughout the design. Passive surveillance is achieved at street level and from the first floor play space. CCTV and lighting systems are also intended to be incorporated.
Community	Childcare centres offer an integral community service to the surrounding community. The surrounding area is intended to be redeveloped with additional higher density residential and mixed use developments. This will attract additional people to the area. The proposed development will provide an important service to these people who will reside in the area and in an area which is highly accessible by car and public transport.
Aesthetics	The proposed development engages with the existing vernacular of Burswood Road, which is evolving and quite diverse. The proposed built form is simple and practical, incorporating a range of materials consistent with the surrounding area.

Table 2: Architectural Statement

6. Statutory Planning Considerations

6.1 Zoning and Land Use Permissibility

6.1.1 Metropolitan Region Scheme

Under the provisions of the Metropolitan Region Scheme (**MRS**), the subject site is zoned 'Urban'. The proposed development is consistent with development within the 'Urban' zone.

Refer **Figure 4 – Metropolitan Region Scheme Mapping**.

6.1.2 Town of Victoria Park Local Planning Scheme No. 2

Under the provisions of Town of Victoria Park Local Planning Scheme No. 2 (**LPS 2**), the subject is zoned 'Mixed Use'. In addition, the subject site is located within Precinct 3 – Causeway Precinct under LPS 2. The Precinct Plan does not state specific objectives for the zone, but refers to the Causeway Precinct Review Final Report (Modified) of March 2009 (**CPR**), where the 'approved concept' for the precinct is outlined.

The CPR deems the site within 'Area 4 Parkside Terrace' and states development provisions for the area which are to be considered in design, these are outlined in section 6.2 of this report.

Refer **Figure 5 – Town of Victoria Park Local Planning Scheme No. 2 Zoning**.

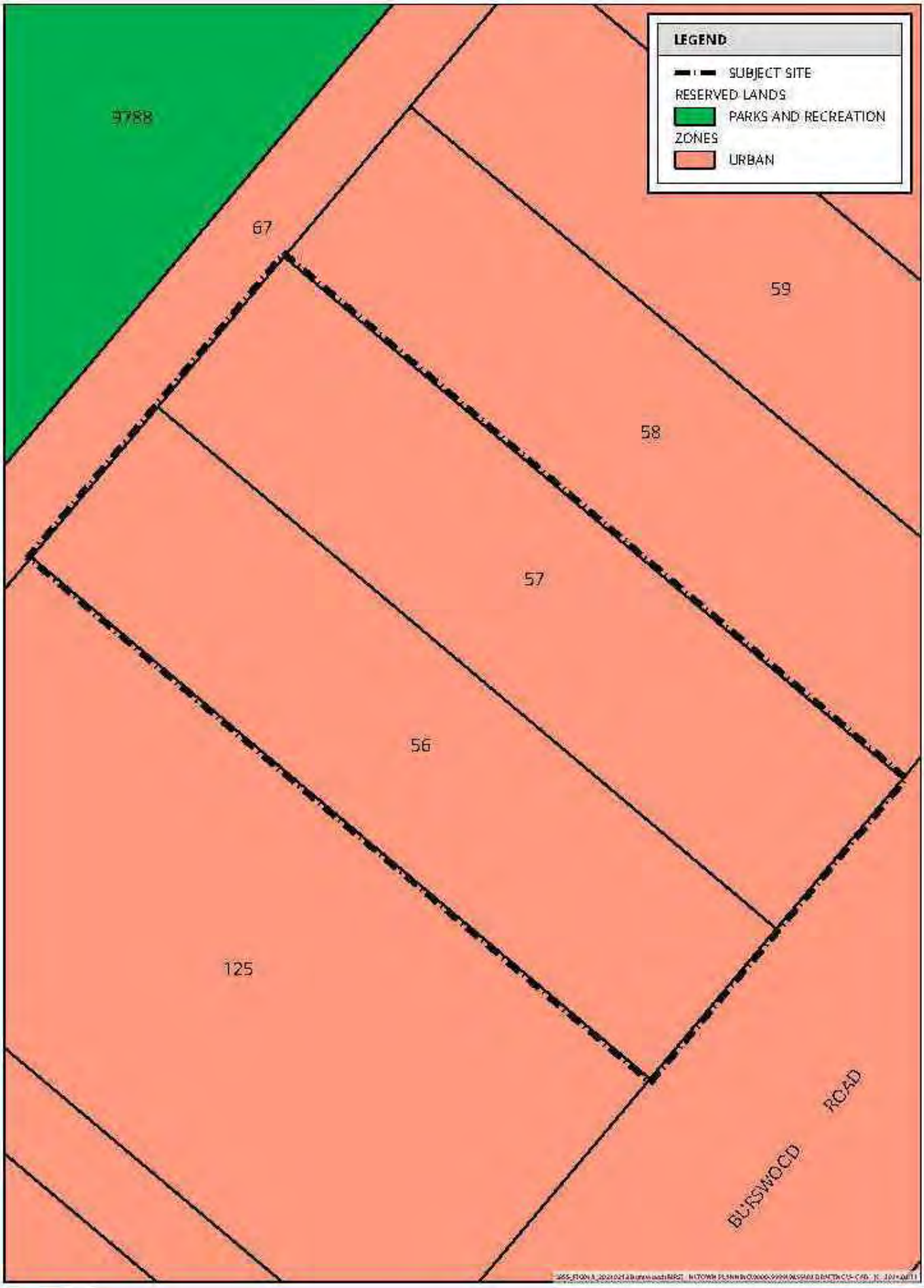
The proposed development incorporates two types of land uses – office and childcare centre. The proposed activities are consistent with the following land use definitions in LPS 2:

> ***Office*** *means premises used for administration, clerical, technical, professional or similar business activities.*
>
> ***Child Care Premises*** *means premises where –*
>
> *a) an education and care service as defined in the Education and Care Services National Law (Western Australia) section 5(1), other than a family day care service as defined in that section, is provided; or*
>
> *b) a child care service as defined in the Child Care Services Act 2007 section 4 is provided;*

The 'Office' land use is classified as a 'P' use whereas the 'Child Care Premises' land use is identified as an 'A' use at the subject site (in Precinct 3 – Causeway Precinct) within the 'Mixed Use' Zone in the Zoning Table under LPS 2. Therefore, the proposed land uses are capable of being approved at the subject site under LPS 2. In accordance with Clause 18 of LPS 2, the 'P' and 'A' use classifications are described as follows:

> *"P" means that the use if permitted If it complies with any relevant development standards and requirements of this Scheme; and*
>
> *"A" means that the use is not permitted unless the local government has exercised its discretion by granting development approval after advertising the application in accordance with Clause 64 of the deemed provisions.*

Therefore, the proposed land uses are capable of being approved at the subject site under the provisions of LPS 2.



0 10 m

SCALE @ A4 1:300

FIGURE 4

METROPOLITAN REGION SCHEME MAPPING

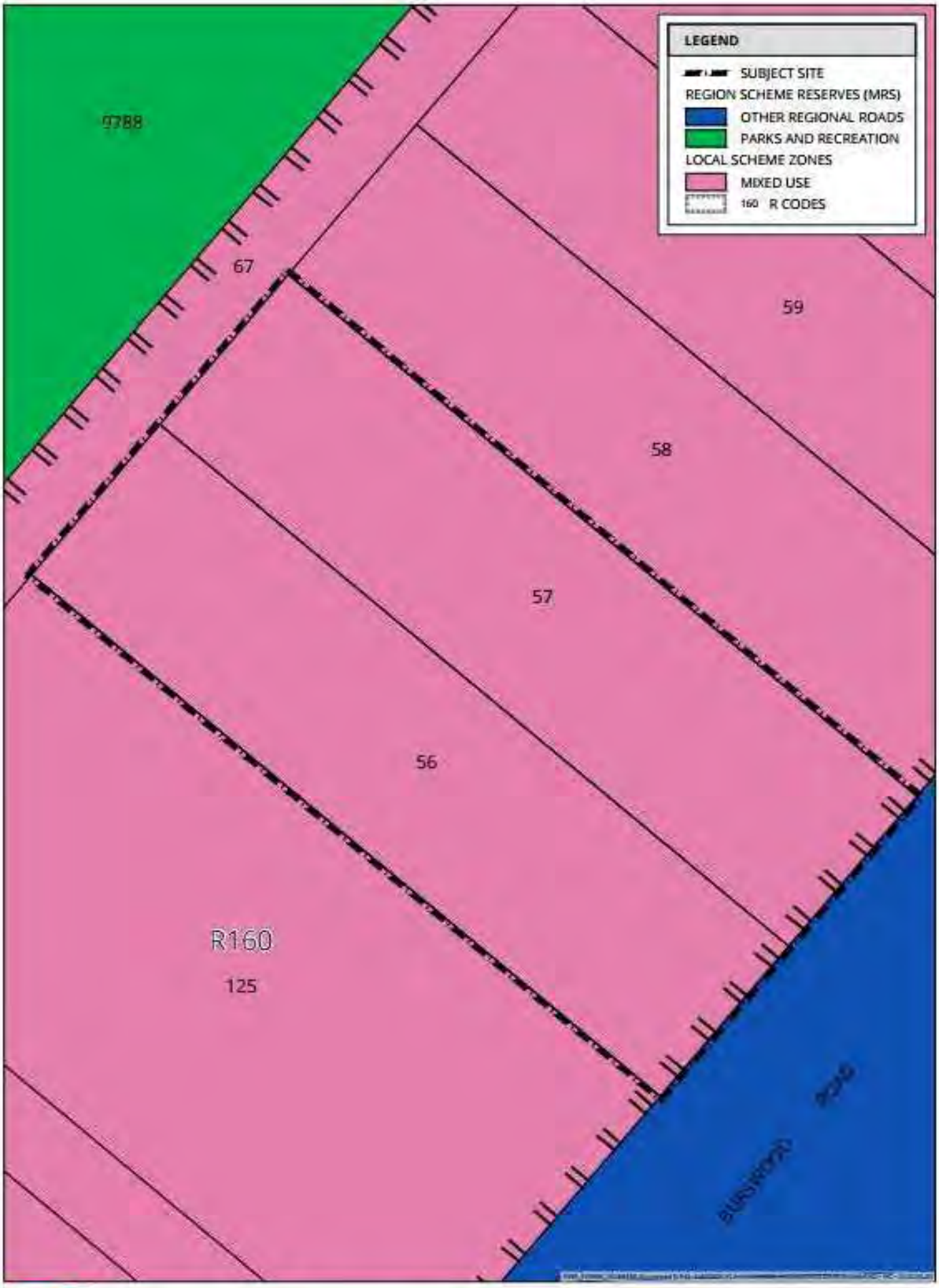


FIGURE 5
TOWN OF VICTORIA PARK LOCAL PLANNING SCHEME No.2 ZONING

6.2 Development Standards

The following Local Planning Policies set out a range of development standards which apply to the site and the proposed development.

6.2.1 Local Planning Policy No. 6 – Family Day Care and Child Care Premises

Local Planning Policy No. 6 – Family Day Care and Child Care Premises (**LPP 6**) outlines the requirements that apply to Child Care Premises, including submission requirements. The policy establishes a consistent approach for the Council to consider proposals for the establishment of new or expanded child care services within the Town.

Refer to Table 1 of **Attachment 6** for an assessment of the proposed development against the provisions of LPP 6.

6.2.2 Local Planning Policy No. 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way

Local Planning Policy No. 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way (**LPP 7**) aims to enhance the use and development of rights-of-way in established areas. The proposed development is accessible via a laneway on the north side of the subject site.

Refer to Table 2 of **Attachment 6** for an assessment of the proposed development against the provisions of LPP 7.

6.2.3 Local Planning Policy No. 22 – Development Standards For Causeway Precinct

Local Planning Policy No. 22 – Development Standards For Causeway Precinct (**LPP 22**) outlines development provisions for the general location, along with specified sub-areas within the precinct to align development to.

The Causeway Precinct Review Final Report (Modified) deems the site within 'Area 4 Parkside Terrace' and states the following development provisions for the area which are to be considered in design.

The desired future character for this area is designated as follows:

> *This area will undergo significant change, with new residential development up to 6 storeys fronting GO Edwards Park and forming an urban terrace edge of apartments. The laneway will be widened and significantly upgraded, becoming a mini-street flanking the park. Thinning and under-pruning of trees will provide sight lines into the park to improve safety for park users. Apartments will front onto the new mini-street and address the park, providing surveillance for park safety while offering amenity and views for residents. Additional dedicated pedestrian entry to apartments will be provided off the Burswood Road frontage.*
>
> *Modern commercial frontage required to Burswood Road at street level with office and/or residential above, to a maximum of 3 storeys. All car parking accessed off the mini-street*

Refer to Table 3 of **Attachment 6** for an assessment of the proposed development against the provisions of LPP 22.

6.2.4 Local Planning Policy No. 23 – Bicycle Parking, Car Parking and Access for Non-Residential Development

Local Planning Policy No. 23 – Bicycle Parking, Car Parking and Access for Non-Residential Development (**LPP 23**) aims to facilitate the development of adequate parking facilities and safe, convenient and efficient vehicle and bicycle access for pedestrians, cyclists and motorists.

Refer to Table 4 of **Attachment 6** for an assessment of the proposed development against the provisions of LPP 23.

6.2.5 Local Planning Policy No. 38 – Signs

Local Planning Policy No. 38 – Signs (**LPP 38**) sets out the development standards for various sign types in order to ensure signage does not adversely impact on the amenity of the streetscape and surrounding area.

The proposed development incorporates the following signs:

- One (1) wall sign (above awning sign) on the first floor wall on the rear (northern façade) of the building. This sign is 800mm in height and 2700mm in length.
- One (1) wall sign (above awning sign) on the first floor wall on the front (southern façade) of the building. This sign is 2200mm in height and 2300mm in length.
- Three (3) wall signs (awning sign) above the doors and under the awning on Burswood Road. These signs are 250mm in height and 1600mm in length.

The proposed signs are compliant with the provisions of LPP 38 for the following reasons:

- The two (2) above awning signs on the rear and front of the building does not comprise more than 25% of the wall to which it is attached and comprise of corporate branding (business name and logo) for the childcare centre tenant in the form of 3-dimensional lettering fixed directly to the wall.
- There is one (1) above awning sign on each street frontage of the building.
- The two (2) above awning signs are fixed parallel to the wall.
- Under the provisions of LPP 38, the subject site is permitted to have a combined awning sign area of 9.7m^2. Each awning sign has an area of 0.4m^2 with a combined area of 1.2m^2.
- Each awning sign has a clearance of approximately 2.95m above the footpath.

On the basis of the above, the proposed signage is compliant.

6.2.6 Local Planning Policy No. 45 – Tree Planting for Non-Residential Development

Local Planning Policy No. 45 - Tree Planting for Non-Residential Development (**LPP 45**) sets out the development standards in relation to the planting and replanting of trees for all non-residential development within the Town.

Refer to Table 5 of **Attachment 6** for an assessment of the proposed development against the provisions of LPP 45.

6.2.7 Local Planning Policy No. 46 – Sustainable Development

Local Planning Policy No. 46 - Sustainable Development (**LPP 46**) aims to deliver the outcomes consistent with the Town's Local Planning Strategy and Climate Emergency Plan. Part B of LPP 46 provides the requirements for non-residential development and are detailed below as follows:

B1) All development is to be designed and constructed to achieve a rating not less than 4 star Green Star using the relevant Green Building Council of Australia Green Star rating toll, or equivalent, demonstrated through a report provided by a suitable qualified professional;

B2) Council may exercise discretion to waive or vary the requirements of the policy in the case where:

a) Development involves refurbishment of a building included on the Heritage List or in a Heritage Area where, in the opinion of the Council, adherence to the requirements of Clause 1 would detrimentally impact on the heritage values of the building or area; and/or

b) No suitable sustainability rating tool has yet been developed for assessment of the type of development proposed but it demonstrates a higher than standard energy and water efficiency.

B3) An application for development approval is to be accompanied by a written report from a suitably qualified professional stating that that based upon the drawings and information provided as part of the development application, the building is capable of achieving the requirement at part B1 of this Policy.

B4) Unless the Council waives any particular requirement, an application subject to this policy may be made subject to a condition of approval that:

a) Prior to the issue of a building permit, the applicant/owner is to submit a copy of documentation from the Green Building Council of Australia or a suitably qualified professional stating how the development will achieve a Green Star rating of at least 4 Stars or equivalent, to the satisfaction of the Town; and

b) Prior to occupation, the applicant/owner is to submit a copy of documentation from the Green Building Council of Australia or a suitably qualified professional stating that the development as constructed achieves a Green Star rating of at least 4 Stars or equivalent, to the satisfaction of the Town.

In accordance with the abovementioned requirements, a Sustainability Design Assessment Report has been prepared for the proposed development. Although the Report details that the proposed development is considered too small for formal certification, the report indicates that the proposed development, based off the provided development plans, can expect a score of '29.5 points', which approximately equates to a 4.75 Green Star rating.

Based on the above, the proposed development is compliant with LPP 46.

Refer **Attachment 4 – Sustainability Design Assessment Report.**

7. Technical Considerations

7.1 Sustainable Design

An Energy Efficiency Report (**EER**) has been prepared by Green Start Consulting in support of the proposed development. The EER demonstrates compliance with the National Construction Codes, in particular the Section J energy efficiency requirements.

Refer **Attachment 5 - Energy Efficiency Report.**

7.2 Noise

A Noise Report has been prepared by Lloyd George Acoustics in support of this Development Application. The Noise Assessment has been prepared to demonstrate compliance with the *Environmental Protection (Noise) Regulations 1997* (**Noise Regulations**) and the provisions of SPP 5.4.

Refer **Attachment 7 – Noise Assessment.**

7.3 Traffic

A Transport Impact Statement (**TIS**) has been prepared by Shawmac in support of this Development Application. The TIS has been prepared to address the requirements of the Western Australian Planning Commission (**WAPC**) Transport Impact Assessment Guidelines.

Refer **Attachment 8 – Transport Impact Statement**.

The TIS demonstrates that the proposed development will not have an adverse impact on the surrounding road network and that the proposed development incorporates sufficient parking.

7.4 Waste Management

A Waste Management Plan (**WMP**) has been prepared by Talis, which addresses the storage and collection of waste generated by the proposed development.

Refer **Attachment 9 – Waste Management Plan**.

The WMP demonstrates that the proposed development incorporates a sufficiently sized waste store area. Waste will be collected from the laneway / right of way by a private contractor.

7.5 Stormwater

A Stormwater Drainage Plan (**SDP**) has been prepared by Structerre Consulting Engineers to support of the proposed development.

Refer **Attachment 10 – Stormwater Drainage Plan**.

The SDP demonstrates stormwater retention for a 1 in 100 year storm event of a 5 minute duration, as required by the Town.

7.6 Site Contamination

A Due Diligence Contamination Investigation has been prepared by West Soil & Water in support of this development application. Based on the findings of the investigation, the following is recommended:

- As the investigation has found low levels of contamination that, depending on the proposed development, may present a risk to human and ecological health, it is recommended that a Form 1 is completed and submitted to DWER. Reporting of possibly contaminated sites is a requirement of the *Contaminated Sites Act 2003*. This report should accompany the Form 1;
- Due to the age of the demolished building, it is recommended that the exposed soil footprint of the former building is subject to assessment for asbestos in accordance with the DoH's requirements;
- Due to the identification of EIL/ESL exceedances, it is recommended that further soil bores are sunk within the proposed garden area (north-eastern area). For completeness, collected soil samples should be subject to analysis for all COPCs listed within this report;
- Additional targeted bores are recommended towards the rear of the former building, where unknown material was identified during the review of historical aerials (adjacent to the current S9 soil bore);
- Additional soil bores are sunk at within the north-western portion of the Site, to confirm soil conditions and COPCs in this area, whilst additional soil bores are sunk within the area of USTs located along the western Site boundary;
- A GPR survey is undertaken across the Site to confirm the removal of all underground fuel infrastructure;
- No true down hydraulic gradient groundwater monitoring well exists at the Site and the installation of a further bore in the north-western corner of the Site should be considered
- Update of this report to incorporate the additional information;
- A restriction on deep-rooted trees within the garden area should be adopted;
- Depending on the outcome of the additional works, remedial works may be required; and
- A Site Management Plan (SMP) and/or Construction and Environmental Management Plan (CEMP) is prepared to mitigate against any risk during construction of the Childcare centre.

Any required action will be undertaken separate to this development application.

Refer **Attachment 11 – Due Diligence Contamination Investigation.**

8. Conclusion

This Application seeks Development Approval for a two (2) storey Mixed Use Childcare Development consisting of two (2) ground floor Tenancies and a Child Care Centre at Lot 56 and 57 (No. 147) Burswood Road, Burswood (**the subject site**).

The proposed development is consistent with the State and local planning framework and should be supported by the Metro Inner Development Assessment Panel for the following reasons:

- The proposal will assist to meet an existing demand for additional childcare services in the locality, based on the current population of the suburbs of Burswood, Lathlain and Victoria Park.
- The proposal will assist to meet demand for additional childcare services in the locality, based on the future population projections within the suburbs of Burswood, Lathlain and Victoria Park outlined in the Town of Victoria Park Local Planning Strategy (**LPS**).
- The proposal is supported by a Noise Assessment which demonstrates compliance with the provisions of State Planning Policy No. 5.4 – Road and Rail Noise (**SPP5.4**).
- The proposed development satisfies the 10 design principles outlined in State Planning Policy No. 7.0 – Design of the Built Environment (**SPP 7.0**).
- The subject site is zoned 'Urban' under the Metropolitan Region Scheme (**MRS**). The proposed development is consistent with development within this zone.
- The proposed land uses are capable of being approved within the 'Mixed Use' Zone, as specified in the Zoning Table in the Town of Victoria Park Local Planning Scheme No. 2 (**LPS 2**).
- The proposed development is generally consistent with the provisions of the Town's Local Planning Policy No. 6 – Family Day Care and Child Care Premises (**LPP 6**), Local Planning Policy No. 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way (**LPP 7**), Local Planning Policy No. 22 – Development Standards for Causeway Precinct (**LPP 22**), Local Planning Policy No. 23 – Bicycle Parking, Car Parking and Access for Non-Residential Development(**LPP 23**), Local Planning Policy No. 38 – Signs (**LPP 38**), Local Planning Policy No. 45 – Tree Planting for Non-Residential Development (**LPP 45**) and Local Planning Policy No. 46 – Sustainable Development (**LPP 46**).
- The Development Application is supported by a Transport Impact Statement (**TIS**) which addresses the requirements of the Western Australian Planning Commission (**WAPC**) Transport Impact Assessment Guidelines and demonstrates that the proposed development will not have an adverse impact on the surrounding road network.
- The Development Application is supported by a Waste Management Plan (**WMP**) which addresses the storage and collection of waste generated by the proposed development.
- The Development Application is supported by an Energy Efficiency Report (**EER**) which demonstrates compliance with the National Construction Codes, in particular the Section J energy efficiency requirements.
- The Development Application is supported by a Noise Assessment which demonstrates that the proposed development will comply with the assigned noise levels of the *Environmental Protection (Noise) Regulations 1997* (**Noise Regulations**).

- The Development Application is supported by a Stormwater Drainage Plan (**SDP**) which demonstrates that the proposed development can retain stormwater on-site from a 1 in a 100 year storm event for a duration of 5 minutes.

The development is consistent with the principles of orderly and proper planning and represents an important community service to be provided to the Town. On the basis of the above, the proposed development should be supported and approved.

Attachment 6 – Assessment of Proposed Development Against the Relevant Provisions

TABLE 1 – Local Planning Policy No. 6 – Family Day Care and Child Care Premises

The table below addresses the relevant development provisions and the corresponding design response:

Development Requirement	Response
2.2 Location	
Child care premises should be appropriately located to ensure they meet the needs of children and their families as well as limiting the impact they may have on surrounding activities and vice versa.	As demonstrated in Section 5.1 of this Report, there is a need for the proposed childcare centre.
(a) A proposed child care premises may be suitable in locations that are: i. within convenient walking distance (5-10 minutes), or part of, appropriate commercial, recreation or community nodes and education facilities (e.g. local parks and playground facilities, schools and kindergartens, etc.); ii. located in areas where adjoining uses are compatible with a child care premises (includes considering all permissible uses under the zoning of adjoining properties); iii. serviced by public transport; iv. considered suitable from a traffic engineering/safety perspective; and v. of sufficient size and dimension to accommodate the development, including provision of sufficient outdoor play space and other facilities as required by the Act and the Regulations, and on-site car parking, without unreasonably affecting the amenity of the area.	The location of a childcare centre use at the subject site complies with these requirements for the following reasons: - The childcare centre abuts G.O. Edwards Park, Kagoshima Park, Burswood Park and Charles Paterson Park, and is located opposite to Perth Montessori School. - The proposal includes other commercial development on the ground floor. The childcare centre is complementary to the ground floor commercial uses and will provide a community service to the surrounding existing and future residents. - The site is in proximity to Burswood train station. Surrounding streets are serviced by bus routes 935, 270, 39, 940. - The proposed development is supported by a Transport Impact Statement which demonstrates that traffic generated by the proposal will not have an adverse impact on the surrounding road network. Refer to **Attachment 7 – Transport Impact Statement.** - The childcare centre is a purpose built and designed facility which will comply with the relevant outdoor play space requirements set out by the relevant Act and Regulations.
(b) Child care premises are not considered suitable in locations where: i. soil contamination exceeds the levels regarded by DEC and DOH as suitable for standard residential land uses with accessible soils as published in guideline "Assessment Levels for Soil, Sediment and Water" (Department of Environment, November 2003); ii. groundwater is to be abstracted for the irrigation of gardens and play area within the child care premises and groundwater contamination exceeds 10 x Australian Drinking Water Criteria in	The location of a childcare centre use at the subject site complies with these requirements for the following reasons: - A desktop search of the Department of Water and Environmental Regulation Contaminated Sites Database indicates that the subject site is not a registered contaminated site. - Groundwater is not intended to be abstracted at the subject site.

Development Requirement	Response
accordance with the "Contaminated Sites Reporting Guideline for chemicals in groundwater" (Department of Health 2006); iii. access is from a major road or in close proximity to a major intersection where there may be safety concerns; iv. access is from a local access street where there may be unreasonable adverse amenity impacts due to traffic and parking; v. the current use or any permissible use under the zoning of the adjoining premises produces unacceptable levels of noise, fumes or emissions or poses a potential hazard by reason of activities or materials stored on site; vi. noise produced by roads, railways and aircraft are likely to have an adverse impact on the site; and/or vii. the site is in a heavy industry area or within the buffer area of a heavy industry area.	- Access to the proposed development to be taken from a rear laneway in accordance with LPP 7. - All properties abutting the laneway are required to take access from the laneway in accordance with LPP 7. Therefore, there is no considered to be any amenity impacts due to traffic and parking. - The proposed development is supported by a Noise Assessment which demonstrates compliance with the relevant assigned noise levels specified by the *Environmental Protection (Noise) Regulations 1997*. Refer **Attachment 5 – Noise Assessment**. - The proposed development is supported by a Noise Assessment which demonstrates compliance with the provisions of SPP 5.4. Refer **Attachment 5 – Noise Assessment**. - The surrounding area is not zoned for industrial activities.
2.3 Site Characteristics	
(a) Size and Shape of Site i. Sites selected for child care premises should be of sufficient size and suitable shape to accommodate the development, including all buildings and structures, parking for staff and parents, outdoor play areas and landscaping. ii. Sites in residential areas should have a regular shape, with a minimum lot area of 1,000m2 and effective frontage of 20 metres width to provide the opportunity for design aimed at minimising the impact on surrounding properties.	The proposed development complies with these requirements for the following reasons: - The childcare centre is a purpose built and designed facility which will comply with the relevant outdoor play space requirements set out by the relevant Act and Regulations. The subject site is of a sufficient size to ensure compliance. - The site is a regular shape with an area of 1,226m^2 and a frontage of 24.4m to both Burswood Road and the rear laneway.
(b) Topography The site should generally be flat or gently sloping, as steep slopes may affect access to the facility, noise transfer and methods of noise mitigation.	The topography of the subject site is flat.
(c) Site Contamination As a sensitive land use, any party considering development of a child care premises should obtain and consider any information the Department of Water and Environment Regulation (DWER) may have about the contamination status of a given site. Even in the absence of a report to DWER there is no guarantee that the site has not been contaminated by a previously operating land use and applicants/operators must exercise a duty of care to ensure that the site is suitable for use as a child care premises.	A desktop search of the Department of Water and Environmental Regulation Contaminated Sites Database indicates that the subject site is not a registered contaminated site.

Development Requirement	Response
If the site or adjoining site(s) may have been used for a potentially contaminating activity, a Form 2 – Request for a Summary of Records in Respect of Land is to be applied for and obtained from the Department of Water and Environment Regulation (available from https://www.der.wa.gov.au/your-environment/contaminated-sites/57-forms) for all relevant sites, and supplied to Council with the development application. The site will be assessed by Council to determine potential of soil or groundwater contamination having regard to previous or currently operating land uses on and within the vicinity of the site, and may refer the application to the Department of Water and Environment Regulation for comment and advice should the subject site be known or suspected to be affected by a potentially contaminating land use.	
2.4 Design	
(a) Building Appearance i. The visual appearance of the development should reflect the character of the area, enhance its amenity and be considered appropriate for regular use by children, with a welcoming and inviting appearance from the street. ii. The development should be designed having regard to any adopted design guidelines, built form/streetscape policies or other development requirements applicable to the site under the relevant Precinct Plan. iii. Development within or adjacent to residential areas should reflect a residential appearance, character and proportions that responds to the requirements of Council's Local Planning Policy 3 – Non-Residential Uses In or Adjacent to Residential Areas. Particular regard should be given to appropriate building setbacks, roof form and style, external colours, finishes and materials and orientation of building openings, that is sympathetic to surrounding development.	The proposed development complies with these requirements for the following reasons: - The Burswood Road elevation incorporates large ground floor and first floor windows overlooking the street. An awning over the adjoining footpath on Burswood Road provides a human scale to the street and improves the streetscape experience and activation. The use of custom metal screening to the first floor incorporates artwork which will positively contribute to the experience of children at the centre. - The proposal has been designed with the provisions of the LPP 22 in mind. Refer to Table 3 below. - The proposal does not adjoin land zoned 'Residential'. The subject site and the surrounding area is zoned 'Office/Residential' under LPS 1. The proposed development has been designed and is appropriate within the 'Office/Residential' Zone. The Town's Local Planning Policy No. 3 – Non-Residential Uses in or Adjacent to Residential Areas is not applicable in this instance.
(b) Street Walls and Fencing i. Fencing and walls visible from the street should be suitably designed to provide appropriate access, privacy, safety and security, whilst maintaining adequate levels of passive surveillance (i.e. 'open style' fencing) and have a visually interesting appearance.	The proposed development complies with these requirements for the following reasons: - The wall visible from Burswood Road on the second storey is to be Colourbond cladding, glazing and a custom screen with lightweight steel framing. Passive surveillance is provided at ground level with commercial tenancies maximising the use of glazing, and first floor through the permeable screening and glazing.

Development Requirement	Response
ii. Areas of solid walls or screening visible from the street should be of high quality materials and be articulated/visually interesting. Soft landscaping should also be used to reduce the visual dominance of solid portions of walls or fences and soften their appearance from the street. iii. Front fences to child care premises within or adjacent to residential areas should attempt to comply with residential street fencing requirements as far as possible and be constructed of appropriate materials that compliment the development and respect the amenity of the streetscape and surrounding residential properties.	- The specified materials include exposed blockwork, steel stud, painted cfc, concrete panels, and glazing. - The proposal does not adjoin land zoned 'Residential'. The subject site and the surrounding area is zoned 'Office/Residential' under LPS 1. The proposed development has been designed and is appropriate within the 'Office/Residential' Zone.
(c) Fencing to Boundaries with Neighbouring Properties i. New or upgraded boundary fencing shall be required to be a minimum of 1.8 metres high and is encouraged to be of masonry construction in a colour/finish that complements the development as well being of compatible colours and materials to any neighbouring residential properties. ii. Efforts should be made to obtain agreement with neighbouring properties regarding the height, materials and finish of any new/upgraded boundary fencing. iii. The provision of new/upgraded boundary fencing may be applied as a condition of development approval where it is deemed necessary by the Council to reduce the impacts of the development, in particular where the site adjoins residential properties.	There are no fences on the side boundaries.
(d) Location of openings, play areas and other noise sources Openings to rooms which may create a source for unreasonable noise levels, such as play areas, should be oriented away from adjacent residential properties, and be provided with suitable setbacks.	The proposed development is supported by a Noise Assessment which demonstrates compliance with the relevant assigned noise levels specified by the *Environmental Protection (Noise) Regulations 1997*. Refer **Attachment 5 – Noise Assessment**.
(e) Landscaping i. Where car parking is provided between the building and street alignment(s) a minimum 1.5 metre wide landscaping strip to be established and thereafter maintained along the street alignment(s). ii. The development to be designed to retain and conserve existing mature trees on the site as well as existing Council verge trees, wherever possible. iii. Car parking areas to be landscaped and provided with shade trees at a minimum rate of 1 tree per 4 car parking bays provided.	The proposed development complies with these requirements for the following reasons: - There is no parking located between the building and the street. - There is no existing vegetation at the subject site worthy of retention. - The proposed car park is covered by the building. Shade trees within the car park is not possible.
(f) Signage i. All signage associated with the development should be detailed as part of the development application. Where final specifications are unknown, a signage strategy identifying the location, size and type of external advertising signage to be installed on the building/site is to be submitted to Council as part of the development application.	The proposed development complies with these requirements for the following reasons: - The signage for the proposed childcare centre is included since the tenant is known. Signage panels are proposed for the ground floor commercial tenancies.

Development Requirement	Response
ii. Signage should be designed integrally with the building/site and be of modest scale and proportions so as not to visually dominate the site/building or detract from the visual amenity of the streetscape or surrounding properties. iii. The use of tethered banners, inflatable signage or free-standing transportable signs is inappropriate and will not be supported by Council. iv. The design, type, location and number of signs on the site/building is subject to the requirements of Council's Local Planning Policy and/or Local Law related to Signs and/or a signage strategy approved by Council as part of a development application for the site.	- The signage panels are located immediately above the entrance to the building and under the awnings. A sign is also located on the first floor façade to signify the location of the childcare centre. - The proposal does not include the use of tethered banners, inflatable signs or free-standing signs. - The proposed signage is consistent with the Town's LPP 38.
2.5 Car Parking, Vehicular Access and Traffic	
(a) On-site Car Parking and Vehicular Access Car parking and vehicular access shall be provided and designed in accordance with Council's Local Planning Policy 23 – Parking Policy.	Refer to Table 4 for an assessment of the proposal against the provisions of LPP 23.
(b) Traffic Generation i. Development should only be permitted where it does not negatively impact the function or safety of the adjacent roads or cause undue conflict through the generation of traffic or demand for parking. ii. In assessing an application for a new or expanded child care premises, in addition to considering matters such as traffic volumes, road capacity and road safety from a technical engineering perspective, Council will have also regard to these matters from a residential amenity perspective. iii. A Transport Impact Statement (TIS) or Transport Impact Assessment (TIA) prepared by a suitably qualified independent traffic consultant may be required to be submitted as part of a development application, which assesses the likely traffic impacts associated with the proposed development and details how parking and/or traffic will be managed. iv. The appropriate level of traffic assessment required to be undertaken for the proposed development will be determined by Council having regard to the requirements of the Western Australian Planning Commission's (WAPC) (2016) Transport Impact Assessment Guidelines.	The proposed development complies with these requirements for the following reasons: - The development does not propose adverse effects on the traffic of the area as demonstrated by the Transport Impact Statement (**Attachment 7**). - The current road capacity is able to manage additional traffic from the childcare without adverse amenity impacts as demonstrated by the Transport Impact Statement (**Attachment 7**). - This Development Application is supported by a Transport Impact Statement (**Attachment 7**). - The Transport Impact Statement has been prepared in accordance with the WAPC's Transport Impact Assessment Guidelines.
2.6 Noise Impacts	
(a) General Design and Layout Considerations Child care premises should be appropriately designed and operated to minimise the noise impact it may have on adjacent properties, and also limit the impact noise from external sources may have on the child care premises. This may be achieved either by physical separation, design and layout of the premises or by implementing noise-mitigation measures, such as acoustic treatments to buildings or other noise attenuation measures. The following basic principles will apply when considering a proposal:	The proposed development complies with these requirements for the following reasons: - The outdoor play spaces are separated from adjoining development by a solid wall. - The Noise Assessment demonstrates that the proposed childcare centre will comply with the assigned noise levels at all hours, with no noise abatement measures required (refer **Attachment 5**).

Development Requirement	Response
i. Where a child care premises is located adjacent to a noise-sensitive use, such as residential dwellings, retirement villages and nursing homes, the noise-generating activities of the child care premises, such as the outdoor play areas, parking areas and any plant and equipment, are to be located away from the noise-sensitive use; ii. Where, due to design limitations or safety considerations, noise-generating activities such as outdoor play areas are located close to noise-sensitive uses, appropriate noise mitigation is to be undertaken; and iii. The design and construction of buildings may include noise-mitigation measures to reduce impact from external sources and to achieve accepted indoor noise limits.	- The Noise Assessment demonstrates that the outdoor play spaces will comply with the relevant noise requirements for external noise sources (refer **Attachment 5**).
(b) Noise Impact Assessment In general a noise impact assessment/acoustic report will be required by Council where a child care premises is proposed adjacent to a noise sensitive use such as a residential dwelling(s), retirement village or a nursing home.	The Development Application is supported by a Noise Assessment which demonstrates compliance with the assigned noise levels specified by the *Environmental Protection (Noise) Regulations 1997* and compliance with the provisions of SPP 5.4.
(c) Hours of Operation As a general rule, the hours of operation of a child care premises should be limited to between the hours of 7am and 7pm Monday to Saturday, and 9am to 5pm on Sunday, unless otherwise agreed to by Council.	The proposed hours of operation are from 6:30am to 6:30pm, Monday to Friday.
(d) Noise Regulations Sound levels associated with a child care premises are required to comply with the provisions of the Environmental Protection (Noise) Regulations 1997 at all times.	The Development Application is supported by a Noise Assessment which demonstrates compliance with the assigned noise levels specified by the *Environmental Protection (Noise) Regulations 1997.*

TABLE 2 – Local Planning Policy No. 7 – Development and Vehicle Access to Properties Abutting Rights-of-Way

The table below addresses the relevant development provisions and the corresponding design response:

Development Requirement	Response
1. Vehicle access to be solely provided from right-of-way (a) New development on a property abutting a right-of-way is required to gain vehicular access solely from the right-of-way, where the property has a legal right of access to use the right-of-way; (b) It is the responsibility of the owner of a property abutting a right-of-way to demonstrate that they have a legal right to take access from the right-of-way; (c) Vehicle access to a property via the primary and/or secondary street for development on a property abutting a right-of-way will generally not be supported by the Town, unless significant topographic or site specific circumstances prevent the ability to gain access from the right-of-way, or a legal impediment prevents the ability to gain access from the right-of-way; and (d) The presence of an existing crossover(s) providing vehicle access from a primary or secondary street to a property will not be supported by the Town as justification for new development on the property not gaining sole vehicle access from the right-of-way, where access to the right-of-way is possible.	The proposed development complies with these requirements for the following reasons: - The proposal includes access from the adjoining laneway / right of way. - The subject site currently enjoys access from the laneway / right of way. - No vehicle access is proposed via Burswood Road. - The existing crossover to Burswood Road will be removed through the implementation of the approval for this development.
2. Existing developments with access available from a right-of-way (a) The relocation of vehicle access provided from a primary or secondary street (along with associated internal driveways, car parking bays and car parking structures) to a right-of-way is strongly encouraged, wherever possible; and (b) Where existing development has vehicle access from a primary or secondary street but adjoins a right-of-way, the existing access may be retained. However, any additional vehicle access shall be provided and located so as to gain access from the right-of-way.	There is no existing access from the laneway / right of way.
3. Removal of redundant crossovers (a) Where a development is to be provided with sole vehicle access from a right-of-way, any existing redundant crossovers from the primary or secondary street shall be removed and the verge and kerbing shall be reinstated to the Town's specifications prior to occupation of the development.	The redundant crossover to Burswood Road will be removed through the implementation of the approval for this development.
4. Pedestrian access (a) Where sole vehicular access via a right-of-way is proposed for residential subdivision and/or development and the lots or dwellings do not have frontage to the public street, then a pedestrian access leg to the public street for visitors, postal, rubbish collection and utility services will be required; (b) Where a pedestrian access leg is required, it shall be 1.5 metres in width, except where a site is constrained by existing buildings considered worthy of retention by the Town. In such circumstances	N/A

Development Requirement	Response
the width may be reduced to the extent necessary to allow for retention of the existing building(s) but at no point being less than 1.0 metre in width (Refer Figure 1 below); and (c) a minimum 1.0m x 1.0m corner truncation at the intersection of any required pedestrian access leg and the street is to be provided and kept free of obstructions to maintain unimpeded access at all times (Refer Figure 1 below).	
5. Provision for widening of under-width rights-of-way (a) Unless specified to a greater width in an adopted Policy, Design Guidelines or other Council strategy, the Town shall seek the widening and upgrade of the Town's existing rights-of-way to an ultimate width of 6.0 metres; (b) Widening and upgrading shall generally occur as the properties abutting a right-of-way are developed and/or subdivided by individual property owners, with the land required for the widening of the right-of-way being ceded as Crown land as a condition of freehold (green title) subdivision or amalgamation, survey strata or built strata subdivision approval; (c) The land required to be ceded by properties abutting a right-of-way shall generally be an area equal to half the required width of widening required for the right-of-way to reach an ultimate width of 6.0 metres, for the full length of the property boundary abutting the right-of-way. This allows for the full widening of the right-of-way to be shared by the properties either side of the right-of-way (Refer Figure 2 below); (d) No new building works, landscaping, fencing or other obstructions are to be located in the area of a property abutting a right-of-way that is required for the widening of the right-of-way.	The proposed development has taken into account the 1m of land required to be ceded for the laneway / right of way.
6. Truncations (a) Development of properties abutting a right-of-way, including the installation of new or replacement fencing and landscaping, is to make provision for corner lot truncations as follows: i. a minimum 3.0m x 3.0m corner truncation at the intersection of two rights-of way (Refer Figure 3 below); ii. a minimum 2.0 x 2.0m corner truncation at the intersection of a right-of-way and a street (Refer Figure 3 below); and iii. a minimum 1.0m x 1.0m corner truncation at the intersection of a pedestrian access leg and a street (Refer Figure 1 above); and (b) Provision of truncations shall occur after taking into account any required right-of-way widening, with such areas to be ceded as Crown land as a condition of freehold (green title) subdivision or amalgamation, survey strata or built strata subdivision approval; and	N/A

Development Requirement	Response
(c) Corner lot truncation areas at the intersection of two rights-of-way are to form part of the widened and constructed right-of-way (including paving, sealing and drainage requirements).	
7. Upgrading of rights-of-way (a) Where a development gains vehicle access from a right-of-way and the right-of-way is subject to a requirement for widening, the area of widening is to be constructed and drained at the owner/applicant's cost to the Town's specifications prior to commencement or occupation of the development; or (b) Dependent upon the existing construction standard of the right-of-way, and any scheduled upgrading works approved to be carried out to the right-of-way, the Town may impose a requirement for the owner/applicant to make a financial contribution to the Town for the upgrade of the right-of-way in-lieu of construction of the area of land required for widening of the right-of-way.	The Applicant will agree with an appropriately worded condition for the section of the laneway / right of way abutting the subject site to be widened and constructed to the Town's specification.
8. Development of properties abutting unsealed rights-of-way (a) Where the whole or portion of a right-of-way is unsealed but has no long term prospect for closure (as identified in a Right-of-Way Strategy Plan adopted by Council) due to the fact that it provides essential means of vehicular access to existing development abutting the right-of-way, the owner of the property may be required to make a financial contribution to the future construction and drainage of the right-of-way to an ultimate standard of asphalt or concrete paving, based on a pro-rata contribution; (b) The pro-rata contribution is to be based on the cost of constructing half the width of the right-of-way which abuts the total length of the common boundary or boundaries of the lot with the right-of-way and the construction will be on a rate per lineal metre of construction as determined by the Town and reviewed on an annual basis; and (c) Contributions made to the Town in accordance with the above will be held in a designated fund for the construction of rights-of-way and in the interim the Town will undertake to maintain or improve the right-of-way to a serviceable and trafficable standard.	N/A
9. Standard of construction of rights-of-way (a) Where the upgrade or widening of a right-of-way has been authorised, or is required by the Town to be undertaken as a condition of development or subdivision approval, then the construction, sealing, and drainage of the upgraded or widened area of the right-of-way is to be carried out in accordance with the adopted specifications of the Town.	The Applicant will agree with an appropriately worded condition for the section of the laneway / right of way abutting the subject site to be widened and constructed to the Town's specification.
10. Building setbacks (a) For development on 'Residential' zoned land, building setbacks from an adjoining right-of-way shall be in accordance with the Town's Local Planning Policy 25 – Streetscape;	The proposed development complies with a 4m setback from the centreline of the laneway / right of way. Refer **Table 3** for an assessment of the proposed development against the provisions of LPP 22.

Development Requirement	Response
(b) For development on non-residential zoned land, building setbacks from an adjoining right-of-way shall be a minimum of 4.0 metres from the centreline of the right-of-way, but no greater than 7.0 metres from the centreline of the right-of-way where the development takes access from and has an interface with the right-of-way (Refer Figure 4 below); and (c) The provisions contained within location specific Design Guidelines, Precinct Plan development standards or other Council adopted planning instruments for building setbacks from an adjoining right-of-way prevail over (a) and (b) above.	
11. Surveillance and building design (a) The location of visible multi-storey car parking adjacent to a right-of-way is generally not permitted; (b) Upper storeys of residential dwellings adjacent to a right-of-way are to provide at least one major opening from a habitable room that provides surveillance and an outlook on to the right-of-way; (c) Non-residential development adjacent to a right-of-way is required to provide at least one significant window (equivalent in size to a major opening to a residential dwelling as defined by the R-Codes) per 10m of frontage to the right-of-way that provides the opportunity for the development occupants to surveil the right of way; and (d) Bin stores located adjacent to a right-of-way with residential land opposite should be visually screened, well maintained and managed to limit adverse visual impacts, noise, odour emissions, and pests.	The proposed development complies with these requirements for the following reasons: - No multi-storey parking is proposed. - The proposed childcare centre on the first floor provides a large opening to the outdoor play space. - The parking is screened from view of the R.O.W - The entrance lobby to the childcare includes a window to the laneway / right of way. - The bin store is screened behind the ground floor reception of the childcare.
12. Lighting (a) Lighting for safe access, surveillance and security is to be provided at all points of pedestrian and vehicle access to developments adjacent to a right-of-way; (b) It is recommended that lighting be provided by fixed, motion-activated lighting devices adjacent to or above pedestrian and vehicle access points; and (c) Lighting devices are to be designed and positioned to avoid light spill and glare into surrounding private properties.	The proposed development complies with these requirements for the following reasons: - The proposal will include lighting around the exterior of the building, near entrances of the building and car park and within the car parking. - The proposal will also include the use of CCTV for security. - The details of the outside lighting and CCTV will be confirmed in the detailed design drawings and proposal.
13. Landscaping (a) The use of soft landscaping treatments to building frontages and setback areas to the right-of-way is strongly encouraged to soften the appearance of developments and contribute to an attractive streetscape environment; (b) New development using a right-of-way for primary access is required to provide a minimum of 50% soft landscaping within the building setback area to the right-of-way, excluding areas used for vehicular access (e.g. the internal driveway);	The proposed development complies with these requirements for the following reasons: - The proposed development incorporates landscaping between the building and laneway / right of way, to a greater extent than other development in the area. - Approximately 50% of the area between the building and the laneway / right of way is landscaped.

Development Requirement	Response
(c) All landscaping is required to be located within the property boundaries and located behind any required right-of-way widening or corner lot truncation areas; (d) Landscaping is permitted within sightline areas provided it is maintained to less than 0.75m in height; and (e) Landscaping of non-residential car parking areas is to be provided in accordance with the Town's Local Planning Policy 23 – Parking Policy.	- All landscaping, except that within the verge of Burswood Road, is contained within the subject site. - No landscaping is located within 0.75m of vehicle access points. - Refer to Table 4 for an assessment of the proposal against the Town's LPP 23.
14. Fencing, gates and retaining walls (a) All fencing, gates and retaining walls (including their footings) are required to be located wholly within the property boundaries and located behind any required right-of-way widening or corner lot truncation areas; (b) Fencing and gates to residential properties are to be designed in accordance with the requirements of the Town's Local Planning Policy 25 – Streetscape; (c) Fencing to non-residential development adjacent to a right-of-way should be suitably designed to provide appropriate access, privacy, safety and security, whilst maintaining adequate levels of passive surveillance (minimum 50% visually permeable) and having a visually interesting appearance; and (d) Areas of solid walls or screening visible from the right-of-way should be of high quality materials and be articulated/visually interesting. Soft landscaping should also be used to reduce the visual dominance of solid portions of walls or fences and soften their appearance from the right-of-way.	N/A
15. Visual sightlines and vehicle manoeuvring (a) A minimum 1.0m x 1.0m visual sightline truncation to be provided at the intersection of a wall or fence with a vehicle driveway or vehicle entry point to a development accessed from a right-of-way (Refer Figure 5 below). (b) Structures may be permitted within the sightline truncation area provided that: i. the structure has a maximum height of 750mm, or 600mm in the case of a solid portion of wall/fence; or ii. is a fence with wrought iron (or similar) open style infill incorporating one pier (not higher than 2.0m) not exceeding 350mm x 350mm; or iii. is a fence with pickets or horizontal rails with gaps equal to at least the width of the picket or horizontal rail (c) Developments provided with vehicular access from a right-of-way shall be designed to ensure sufficient reversing and manoeuvring area for vehicular access/egress to the satisfaction of the Town (as per Australian Standard AS2890). Generally, a minimum manoeuvring distance (i.e. reversing aisle) of 6 metres between a car parking bay or car parking structure and any other	The building set back a minimum of 2m from the widened section of the laneway / right of way. There are no issues with sightlines at the vehicle access location.

Development Requirement	Response
obstruction/property boundary on the opposite side of the right-of-way (e.g. a light pole or fence on opposite side of right-of-way) is required.	
16. Development approval conditions (a) Where a development gains vehicle access from a right-of-way and/or the right-of-way is subject to a requirement for widening, the Town may impose conditions on any development approval to ensure compliance with the requirements of this policy, including the: i. setting back of all building works and development (including fencing) to ensure adequate provision for the unobstructed widening of the right-of-way, inclusive of any required corner lot truncations; ii. the removal of any redundant crossovers and reinstatement of the verge to an appropriate standard; iii. the construction and drainage of the required area of widening of the right-of-way, inclusive of any required corner lot truncations; and iv. the construction and drainage of any required pedestrian access legs connecting the development to the primary or secondary street.	The Applicant will agree with an appropriately worded condition(s) for the section of the laneway / right of way abutting the subject site to be widened and constructed to the Town's specification.

TABLE 3 – Local Planning Policy No. 22 – Development Standards For Causeway Precinct

The table below addresses the relevant general development and Area 4 – Parkside Terrace provisions and the corresponding design response, refer to the Development Application Report Part 6.2.4 for specified area provisions:

Development Requirement	Response
Area 4 – Parkside Terrace	
(i) Desired Future Character This area will undergo significant change, with new residential development up to 6 storeys fronting GO Edwards Park and forming an urban terrace edge of apartments. The laneway will be widened and significantly upgraded, becoming a mini-street flanking the park. Thinning and under-pruning of trees will provide sight lines into the park to improve safety for park users. Apartments will front onto the new mini-street and address the park, providing surveillance for park safety while offering amenity and views for residents. Additional dedicated pedestrian entry to apartments will be provided off the Burswood Road frontage. Modern commercial frontage required to Burswood Road at street level with office and/or residential above, to a maximum of 3 storeys. All car parking accessed off the mini-street.	The proposal is consistent with the desired future character for the following reasons: - The proposal will include ground level commercial uses to activate the streetscape. - The proposed first floor childcare centre will provide a necessary community service to the surrounding existing residential and future residents of future residential development within the Parkside Terrace Precinct. - Pedestrian access to the development is provided via Burswood Road through a secured walkway. - A moder commercial frontage is provided to Burswood Road.
(ii) Land use	
Mandatory residential frontage to mini-street and park, mandatory commercial frontage to Burswood Rd at street level with residential and/or commercial above	The proposed development includes frontage of two commercial tenancies to Burswood Road, and frontage from the childcare entryway to the laneway / right of way. A variation is sought to the requirement for a residential land use facing the laneway / right of way and opposite park. We are of the view that the proposed variation should be supported for the following reasons: - As mentioned in Section 5.1 of this Report, the Town is expected to experience population growth (18,000 dwellings by 2050 and up to 53,000 people by 2041). This will place significant pressure on existing childcare services and will result in the need for additional childcare centres. - Based on current ABS data, there is already a demand for childcare centre services in the suburbs of Lathlain, Victoria Park and Burswood. The proposal will help address this demand in a location which is intended to be developed for higher density residential development.

Development Requirement	Response
	- The location of a childcare centre in this location, will mean that it is not necessary to be located within a residential area. - The proposed development has been designed to be able to be adapted for residential uses in the future.
(iii) Density	
R160	N/A
(iv) Plot ratio	
2. Commercial and retail floor space at ground and first floor level on Burswood Rd frontage not included in plot ratio for an amount equivalent to the lot width times a depth of 10m for both levels.	The maximum permitted plot ratio area is 2,452m^2. Based on the exclusions under this provision, the proposed plot ratio floor area is 834.4m^2. Therefore, the proposal is compliant.
(v) Building height and form	
Maximum 6 storeys (max 22.5 m) for residential facing park. Minimum 2 storeys (min 7.5 m) and maximum 3 storeys (max 11.25 m) to Burswood Rd frontage. Maximum basement wall height 1.2 m above footpath level at lane/street frontage.	The development is proposed at 2 storeys, with a height of 9.5m. Therefore, the proposal is compliant.
(vi) Setbacks	
Burswood Rd mandatory nil setback. Upper floors above 3 storeys to be setback min 8 m from Burswood Rd. Lane/mini-street mandatory 2 m setback at ground floor and 4 m above ground floor. Balconies may project into the setback area max 2 m. Nil side setbacks mandatory up to 6 storeys to establish terrace form of development.	The proposal incorporates a nil setback to Burswood Road and the side lot boundaries. A 4m setback from the centreline of the laneway / right of way is prosed in accordance with LPP 22.
(vii) Access and parking	
All vehicle access off lane/mini-street. All car parking screened from view, no forecourt parking permitted. Shared visitor/resident pedestrian entry to be provided from the mini-street/lane adjacent to the parkland, to the residential component of developments. Car parking may directly abut the lane/mini-street at ground level, provided at least 30% of the frontage incorporates a residential component including an entry lobby to the residential complex, that addresses the mini-street frontage. Alternative wall/screening treatments to the remainder of the car park street elevation must be of a high architectural/artistic quality.	The proposed development complies with these requirements for the following reasons: - Vehicle access is proposed via the laneway / right of way. - Car parking is screened from via from the laneway / right of way. - Pedestrian access to the ground floor commercial tenancies and the first floor childcare centre is available from both Burswood Road and the laneway / right of way. - Car parking does not directly abut the laneway / right of way.
(viii) Other	

Development Requirement	Response
Development on lots with a side boundary or boundaries abutting identified pedestrian connections must address those connections to provide passive surveillance to provide safety for pedestrians. 1m lane widening required on both sides of lane.	The proposed development has taken into account the widening of the laneway / right of way by 1m.
General Development Provisions	
(a) Laneways (Rights of Way)	
The rationale for laneways within the Precinct to be widened to 7m is to provide acceptable standards in terms of function and amenity. Provisions will require: • land to be ceded free of cost for widening of laneways to achieve a minimum width of 7.0m — in these cases the area ceded for the widening will be included in the calculations for plot ratio, open space and density; and • lots with legal access to a laneway are required to have their only means of vehicular access from the laneway and not a street.	The proposed development has taken into account the widening of the laneway / right of way by 1m as required by the Parkside Terrace Precinct requirements.
(b) Parking	
Residential Uses Parking for residential uses shall be provided in accordance with the requirements of the Residential Design Codes. Some discretion will be considered to permit reductions in parking requirements for visitor parking for residential uses, where there is reciprocal parking available on site with non-residential uses. In addition some discretion will be considered where the small size of the sites or site characteristics, makes the separation of parking and/or pedestrian separation for residential and commercial activities unviable within basement areas. Non-Residential Uses Parking for non-residential uses shall be provided in accordance with the requirements of Local Planning Policy 23 – Parking. Only one bay within a tandem parking configuration shall be credited for non-residential car bays.	Refer to Table 4 for an assessment of the proposed development against the relevant parking requirements.
(c) Balcony Size	
The provisions of the R Codes currently require balconies for multiple dwellings (apartments) in a mixed use development (i.e. where there is residential and commercial development within the same building) to be only 4m 2 with a minimum depth of 1.5 metres. While the R Codes consider this to be a	The proposed development does not include balconies.

Development Requirement	Response
functional area for the enjoyment of residents, there is concern that this does not provide adequate amenity for residents. Provisions will require: A minimum 10m2 balcony with a minimum dimension of 2.0 metres for dwellings in a mixed use development, or ground floor private open space of a minimum area of 16m 2 and minimum dimension of 4m.	
(d) Calculation of Plot Ratio	
Under the Town Planning Scheme and R Codes, residential car parking above ground level is calculated as plot ratio floor area, yet commercial car parking above ground level is not. Given that the majority of car parking will be located at or above ground level, this will penalise residential development. Accordingly all car parking areas (whether at, below or above ground level) will not be calculated as plot ratio floor area. It should be noted that building setbacks and height controls will still control the building form.	N/A
(e) Provision of Communal Open Space	
The provisions of the R Codes currently do not require communal open space (common space set aside for the recreational use of residents) for residential dwellings. This provides for reduced amenity for residents within these types of developments. Accordingly Communal Open Space is to be provided for any one development/building exceeding 20 dwelling units at a rate of 16m2 per unit with a minimum of 8m2 to be provided in a useable/functional space for the active and or passive use of residents, while the remainder of this open space requirement may be provided in the form of additional private open space for individual dwellings in excess of the minimum required balcony or private open space areas and dimensions. For any one development/building of less than 20 dwelling units, a minimum area equivalent to 8m2 communal open space to be provided per dwelling unit, all or portion of which may be provided in the form of additional private open space for individual dwellings in excess of the minimum required balcony or private open space areas and dimensions.	N/A
(g) Pedestrian and Cyclist Access	
Specific provisions for pedestrians and cyclists will require: Bicycle end of trip facilities are to be provided in all new developments above three storeys in height which incorporate commercial floor space. Bicycle parking facilities are to be provided in all new developments.	N/A

Development Requirement	Response
(f) Affordable Housing	
Provision for affordable housing will require: Where developments include more than 20 residential dwellings, a minimum of 10% of all dwellings within the development are required to have a floor area less than 85m2. Where a developer/proponent proposes affordable housing provision (for example via the inclusion of shared equity units) within their development Council will negotiate development incentives. These incentives could include reduced parking requirements.	N/A
(h) Residential Density	
For areas coded R160 within the "Development Provisions for Designated Areas" below, the Council may exercise discretion to permit an increased density. In the exercise of the discretion the Council must be satisfied that if approved were to be granted: (i) the development would be consistent with - • the orderly and proper planning of the locality; • the conservation of the amenities of the locality; and • the statement of intent set out in the relevant Precinct Plan; and (ii) the development would not have any undue adverse affect on – • the occupiers or users of the development; • the property in, or in the inhabitants of, the locality; or • the likely future development of the locality. In the exercise of this discretion the Council must have regard to any assessment of the application by the Design Review Committee and their advice as to whether the application demonstrates a high standard of development and an appropriate design outcome.	N/A

TABLE 4: Local Planning Policy No. 23 – Bicycle Parking, Car Parking and Access for Non-Residential Development

The table below addresses the relevant development provisions and the corresponding design response:

Development Requirement	Response
5.1.1 Bicycle Parking – Provision Bicycle parking shall be provided in accordance with the minimum provision rates specified in *Table 1:* **Land Use Group** / **Short-stay bicycle parking** / **Long-stay bicycle parking** Offices / 1 space per 500m^2 NLA / 1 space per 250m^2 NLA Education and Childcare / 1 space per 100m^2 NLA / 1 space per 250m^2 NLA	A total of two (2) bicycle racks have been provided, allowing for a total of four (4) bicycles at a time.
5.1.2 Bicycle Parking – Design a) All bicycle parking facilities shall be located in a convenient and safe location; b) All bicycle parking facilities shall be located as close as possible to the main entrance of the premises and not require access via steps; c) All bicycle parking facilities shall be designed in accordance with Australian Standard AS2890.3 – Bicycle Parking, with short-stay and long-stay bicycle facilities required to meet the following criteria: **Short-stay bicycle parking** i. Be placed in public view to enable passive surveillance by customers, staff or passers-by; ii. Be located so as not to obstruct pedestrian movements; iii. Be clear of manoeuvring vehicles and opening car doors; iv. Allow the user to secure the bicycle frame and both wheels to the parking device; v. Be protected from the weather; vi. Be will lit; vii. Be spaced to cater for a wide range of bicycle types including cargo bikes and bicycles with a child trailer. **Long-stay bicycle parking** viii. Be accessible via a continuous path of travel from the cycling or vehicle entry point to the premises; ix. Incorporate suitable security features, such as controlled access or security cameras, to provide a high level of security for users; x. Be appropriately signed, both at and on approach to the bicycle parking facilities; and	Provision compliance achieved.

xi. Be arranged so that parking and manoeuvring caters for a wide range of bicycle types including cargo bikes and bicycles with a child trailer.

5.1.3 End-of-Trip Facilities – Provisions

N/A.

a) End-of-Trip Facilities are to be provided in accordance with the minimum provisions specified in *Table 2.*

Total Number of bicycle parking facilities required.	**Minimum provision of End-of-Trip Facilities**
0-5	Not applicable
6-10	2 showers and change room facilities
More than 11	4 showers and change room facilities

5.1.4 End-of-Trip Facilities – Design

N/A

a) All End-of-Trip facilities shall be designed to be safe, convenient, functional, and meet the following criteria:

i. Be located as close as practical to long-stay bicycle parking facilities;

ii. Be provided with lockers to provide storage of clothing, towels and toiletries at a minimum rate of one locker per long-stay bicycle space;

iii. Incorporate suitable security features to ensure the safety of users and their belongings.

b) End-of-Trip Facilities may be designed to be shared between multiple private businesses where shared access arrangements are in place between separate tenancies.

5.2.1 Car Parking – Provision

On-site car parking bays shall be provided in accordance with the 'Open Option' car parking provisions rates set out in *Table 3.*

Land Use	Minimum number of bays required	Maximum number of bays permitted
All	Not applicable unless in accordance with a provision of a local development plan or structure plan.	Not applicable unless in accordance with a provision of the scheme or a precinct structure plan.

Provision compliance achieved.

5.2.2 Car Parking – Design

a) All non-residential car parking facilities shall be designed in accordance with the relevant Australian Standards AS2890.1 Parking facilities – Off Street Parking, and meet the following criteria:

General

b) Car parking areas shall be positioned so that they are not visually prominent from any street other than a right-of-way;

c) Car parking areas shall provide safe and continuous paths of travel for pedestrians and cyclists, preferably physically separated from vehicles but otherwise via differentiating surface treatments, traffic calming measures and/or appropriate signage;

d) Car parking and vehicle circulation areas are to be sealed, drained, line marked and sign posted in accordance with AS2890.1;

Uncovered at-grade parking

e) Uncovered at-grade parking visible from a street other than a right-of-way shall be designed, landscaped and/or screened to prevent negative visual impact on the streetscape;

f) The perimeter of all uncovered at-grade parking areas shall be landscaped by a soft landscaping strip of at least 1.5 metres in width. In some circumstances a greater area in landscaping may be required, particularly where a parking area adjoins a residential property, an area of parkland or an open air recreation area.

g) Uncovered at-grade parking areas shall include shade trees at a minimum rate of one medium tree every four bays.

h) Water sensitive urban design treatment measures should be demonstrated in the design of all uncovered at-grade parking;

Covered parking at-grade or above

i) Covered parking facilities at or above ground level area to incorporate screening, landscaping, public art and/or other design elements to integrate the parking facilities with the building façade;

j) Where covered parking at ground level abuts a street frontage, other than a right-of-way, car parking areas shall be sleeved with active land uses for a minimum of 75% of the frontage to maintain pedestrian interest and activity at street level;

Basement Parking

k) Basement parking should generally not protrude more than 1 metre above ground, and where is protrudes above ground is designed or screened to prevent negative visual impact on the streetscape;

l) Ventilation grills or screening devices for car parking openings shall be integrated into the building façade and landscape design of the development;

Car Stackers

m) Car stackers will not be supported in uncovered at-grade parking facilities unless impacts on the streetscape and adjoining properties are mitigated through incorporated screening, landscaping, public art and/or other design elements to integrate with the building façade to the satisfaction of the Town;

n) All car stackers shall be designed in accordance with Australian Standard AS5124:2017 – Safety and machinery – Equipment for power driven parking of motor vehicles; and

o) An Acoustic Assessment relating to the proposed car stacker system may be required as part of the assessment of an application for development approval.

5.2.3 Car Parking – Special Purpose Bays

Two (2) ACROD bays provided.

ACROD Parking Bays

a) Where new on-site car parking is provided, bays for exclusive use by people with disabilities are o be provided at a rate of 1 space for every 20 car parking spaces or part thereof;

b) All ACROD parking bays shall be designed in accordance with Australian Standard 2990.6 Parking Facilities – Off-street parking for people with disabilities, to be convenient, functional, safe and meet the following criteria:

i. All accessible bays shall be located nearest to the principle pedestrian entrance or where appropriate to a publicly available wheelchair accessible lift of the building it serves;

ii. A continuous, accessible path of travel shall be provided between each ACROD parking space and the pedestrian entry to the building or where appropriate to a publicly accessible wheelchair accessible lift entry;

iii. All accessible bays shall be marked and signposted by incorporating the international symbol of access for people with a disability

Loading Bays

c) In non-residential developments with over 1000m^2 NLA and where car parking is provided, at least one bay shall be permanently set aside as a loading bay marked for the exclusive use of service delivery and courier vehicles.

d) All loading bays shall be designed in accordance with the following criteria:

i. Be located in a convenient and safe location;

ii. Be of a suitable size for the nature of the land use; and

iii. Shall not be located adjacent to any adjoining residential land use.

e) Be appropriately signed, both at and on approach to the loading bay.

5.3 Access to non-residential parking

Provision compliance achieved.

a) Vehicle access points to non-residential parking facilities are to be designed so that access is provided from a:

i. Right-of-way where available for lawful use; or

ii. From the secondary street frontage where available and where no right-of-way for lawful use exists; or

iii. From the primary street frontage where no secondary street or right-of-way for lawful use exists.

b) No more than one access point is provided per street frontage other than a right-of-way;

c) Access to developments on corner lots shall be located the maximum distance possible away from the corner truncation;

d) Driveways widths are to be kept to a functional minimum, with two-way access to allow for vehicles to exit in a forward gear where:

i. The public street to which it connects is designated as a primary distributor or district distributor road.

ii. The distance from an on-site car parking space to the street is 15.0m or more.

e) Where vehicle access to the car parking facility crosses a footpath, the crossover design and materials shall maintain pedestrian priority for the footpath over vehicle movements;

f) Vehicles exiting a site shall have sightlines to maintain visibility of pedestrians, cyclists and other vehicles in accordance with the following:

i. A minimum 1m x 1m visual sightline truncation is provided at the intersection of a wall or fence with a vehicle exit point from a development.

ii. Structures may be permitted within the sightline truncation area provided that:

I. The structure has a maximum height of 750mm, or 600mm in the case of a solid portion of wall/fence; or

II. Is a fence with an open style infill incorporating one pier not exceeding 350mm x 350mm; or

III. Is an open style fence with pickets or horizontal rails with gaps equal to at least the

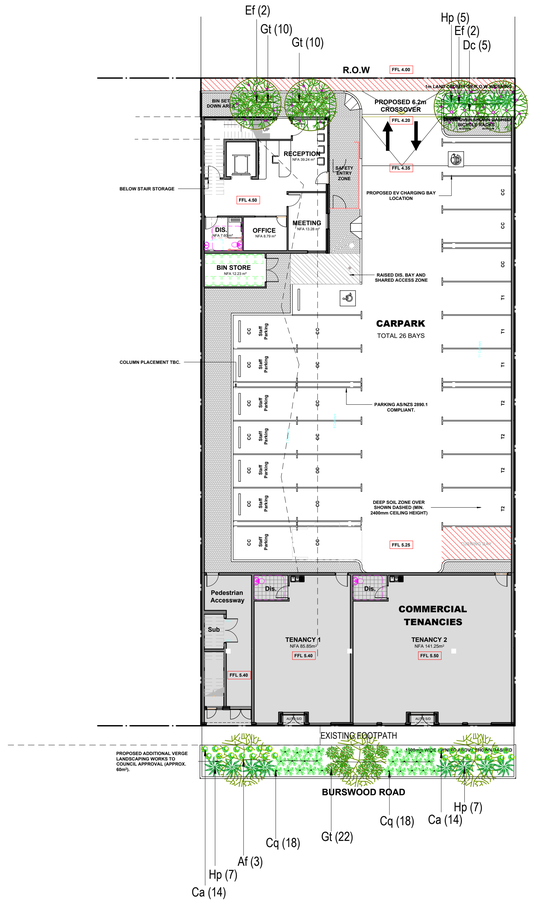
width of the picket or horizontal rail. g) Where sight lines are unavoidably compromised suitable traffic calming and other safety devices may be required.	

TABLE 5: Local Planning Policy No. 45 – Tree Planting for Non-Residential Development.

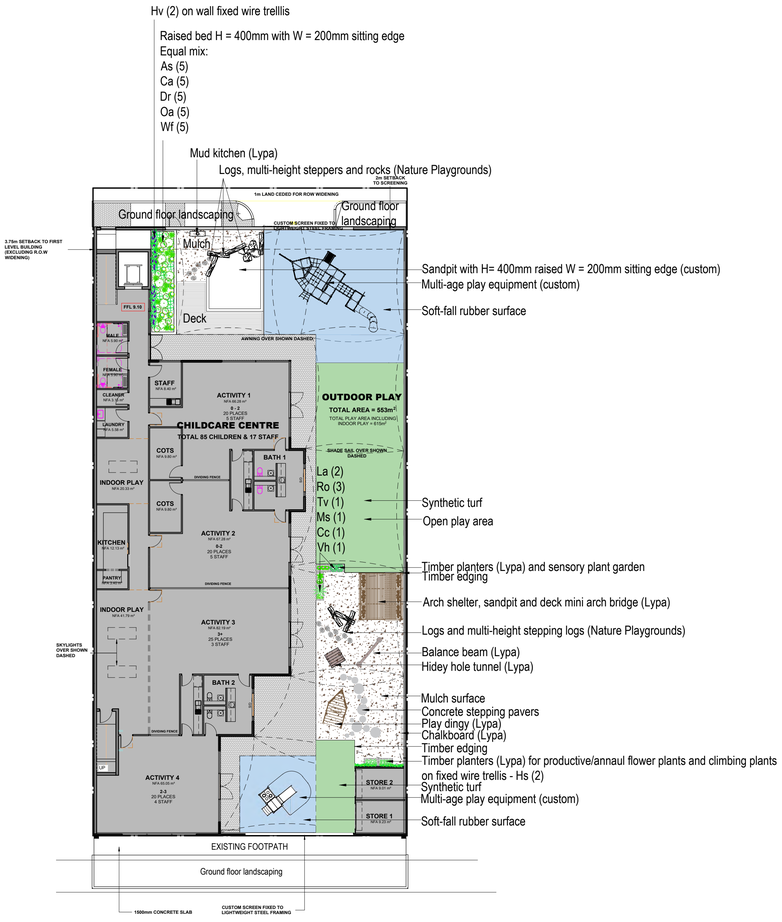
The table below addresses the relevant development provisions and the corresponding design response:

Development Requirement	**Response**
5.0 Policy Requirements	
5.1 New non-residential development Applications for new non-residential development or additions to a non-residential development which increase the existing net floor area with a value exceeding $200,00: a) **'medium trees'** are to be provided at a rate of one (1) tree for every 300m^2 of lot area (rounded to the nearest whole number), or 1 per **'regulated tree'** that is removed (whichever is the greater). b) The total number of trees required in Clause (a) may be reduced to a rate of one (1) tree for every 500m^2 (rounded to the nearest whole number) for each **'regulated tree'** that is retained on the site, or **'large tree'** that is provided. c) All uncovered at-grade parking areas are to contain trees: i. At a minimum rate of one (1) medium tree for every two (2) bays; ii. The provision of trees within a car parking area as per this clause (c) is credited towards satisfying the tree planting requirement of clause (a) and/or (b); and iii. Trees planted within car parking areas are to be planted within a reticulated tree growth zone of a suitable size and depth to the satisfaction of the Town. d) In instances where site constraints may prevent the planting of a tree on each lot at the above rates (a) to (c), the Town will consider approving the planting of the trees in an alternative location, preferably on the private property, or in some instances within the Council verge or in close proximity to the site (at the cost of the property owner). However, the total amount of trees to be provided is unchanged. *Note: Site constraints are typically classified as:* - Heavily vegetated lots demonstrating a high number of 'regulated trees'; - Irregular shaped lots; - Sites with extensive service utility easements; and/or - Constraints which severely hinder the proposed development as demonstrated by the applicant and accepted by the Town. e) All development is to comply with the General Requirements in Clause 6.	Given the total site area is 1,226m^2, a total of five (5) 'large' trees and three (3) 'medium' trees have been provided. Refer **Attachment 3 – Landscape Plan.**

5.2 Application proposing removal of a regulated tree only For non-residential development types not covered by Clause 5.1, which propose the removal of a **'regulated tree',** new tree planting is to be provided at a minimum rate of two (2) **'large trees'** for each tree removed.	N/A
6.0 General Requirements	
6.1 Tree Growth Zone – relating to new tree planting. a) A reticulated 'Tree Growth Zone' (TGZ) is required around the entire base of all new tree plantings, measured at: i. A minimum size of 2m x 2m and a minimum depth of 1m for a 'medium tree'; or ii. A minimum size of 2m x 2m and a minimum depth of 2m for a 'large tree'. b) No structure, unless water permeable, is to encroach within the TGZ, above or below ground level. c) The TGZ is to be contained completely on the site and is not to encroach into an adjoining lot. d) If the TGZ is situated on top of an impermeable surface, specialist supporting documentation in the form of a report prepared by a **'suitably qualified landscape architect'** or arborist may be required, at the expense of the applicant, confirming that the design of the TGZ is appropriate to allow the tree to grow to maturity, to the satisfaction of the Town. e) Water Sensitive Urban Design measures are proposed in the car park design that enables long term sustainable watering of landscaping areas.	TGZ's have been identified around each provided tree.
6.2 Alternative Design Solutions An alternative design solution that varies any of the requirements contained in this policy will only be considered in circumstances where the alternative is consistent with the objectives of the policy and may need to be justified in a report prepared by a **'suitably qualified landscape architect'** , to the satisfaction of the Town.	N/A
6.3 Tree Maintenance and Replacement In approving development applications involving new tree planting, Council will impose conditions of approval relating to: a) The planting and watering (via automated irrigation system or other similar method) for the first five summers by the landowner); and b) Adequately maintaining and keeping the tree(s) in good health, (through supplementary watering, periodic mulch application and applying of soil conditioners).	N/A



GROUND FLOOR



FIRST FLOOR

LANDSCAPE AREA

i. Ground Floor	21m2
ii. First Floor	425m2
	447m2 (36.5%)

PLANT SCHEDULE

Symbol	Code on plan	Botanic Name	Mature height x width	Minimum installation size	Density	Quantity
TREES (7- site 4, verge 3)						
	Af	Agonis flexuosa 'Lemon and Lime'	5m x 4m	45 Litres	Per symbol	3
	Ef	Eucalyptus forrestiana	5m x 4m	45 Litres	Per symbol	4
SHRUB						
	As	Acmena smithii 'Allyn Magic'	50cm x 50cm	14cm	2	5
	Dc	Darwinia citrodora	1.5m x 1m	14cm	1	5
	La	Lavender angustifolia 'Essence'	60cm x 60cm	14cm	Per Symbol	2
	Ms	Mentha satureioides (Native mint)	40cm x 40cm	14cm	Per Symbol	1
	Oa	Olearia axillaris 'Beachball'	40cm x 80cm	14cm	2	5
	Ro	Rosmarinus officinalis 'Santa Barbara'	30cm x 30cm	14cm	Per symbol	3
	Tv	Thymus vulgaris 'Faustino' (Thyme)	20cm x 40cm	14cm	Per Symbol	1
	Wf	Westringia fruticosa 'Grey Box'	45cm x 40cm	13cm	2	5
GRASSES						
	Ca	Conostylus aculeata	50cm x 50cm	13cm	2	3
	Cc	Cymbopogon citratus (Lemongrass)	1m x 60cm	13cm	Per symbol	1
	Dr	Dianella revoluta 'Revelation'	50cm x 50cm	13cm	2	5
GROUND COVER /CLIMBING PLANTS						
	Cq	Calothamnus quadrifidis 'Emerald Carpet'	20cm x 80cm	14cm	2	36
	Gt	Gevillea thelmanniana 'Mini Marvel'	30cm x 1m	14cm	2	42
	Hv	Hardenbergia violacea 'Happy Wanderer'	Climbing to 3m	14cm	Per symbol	2
	Hp	Hemiandra pungens 'Alba'	30cm x 1.5m	14cm	1	19
	Hs	Hibbertia scandens	30cm x 2m	14cm	Per symbol	2
	Vh	Viola hederacea	10cm x 1m	13cm	1	1
TOTAL						145

TREE VARIETIES



Agonis flexuosa 'Lemon and Lime'

Eucalyptus forrestiana

SHRUB VARIETIES



Acmena smithii 'Allyn Magic'



Darwinia citriodora



Lavender angustifolia 'Essence'



Mentha satureioides



Olearia axillaris 'Beachball'



Rosmarinus officinalis 'Santa Barbara'



Thymus vulgaris 'Faustino'



Westringia fruticosa 'Grey Box'

GRASS VARIETIES



Conostylus aculeata



Cymbopogon citratus



Dianella revoluta 'Revelation'

GROUND COVER/CLIMBING PLANT VARIETIES



Calothamnus quadrifidis 'Emerald Carpet'



Grevillea thelmanniana 'Mini Marvel'



Hardenbergia violacea 'Happy Wanderer'



Hemiandra pungens 'Alba'



Hibbertia scandens



Viola hederacea

INSTALLATION SPECIFICATIONS

1. TREE AND PLANT MATERIAL SUPPLY AND PLANTING

1.1 PLANT MATERIAL
- ALL PLANT STOCK SUPPLIED BY CONTRACTOR SHALL BE OF THE SPECIES AND SIZES AS THOSE ON THE PLANT SCHEDULE. SHOULD THERE BE ANY DIFFICULTIES IN SOURCING PLANTS, THE CONTRACTOR SHALL RECOMMEND SIMILAR SUITABLE SUBSTITUTE SPECIES AND/OR SIZES TO THOSE SHOWN ON THE DRAWINGS. NO SUBSTITUTIONS SHALL TAKE PLACE WITHOUT WRITTEN APPROVAL BY THE SUPERINTENDENT.
- GREENLIFE AND TURF MUST BE WELL KEPT: DELIVERED TO SITE ON DAY OF INSTALLATION, OUT OF FULL SUN, AWAY FROM ANIMALS AND PESTS AND ROOTS NOT ALLOWED TO DRY OUT AND SHALL:
  - -BE TRUE TO SPECIES, SUBSPECIES AND VARIETY
  - -BE IN FIRST CLASS CONDITION AND HEALTHY
  - -BE OF GOOD FORM CONSISTENT WITH SPECIES AND VARIETY
  - -AND BE PLANTED AS PER THE INSTRUCTIONS BELOW.

1.2 IMPORTED SOIL
- IMPORTED SOIL FOR RAISED PLANTER SHALL BE FULLY CERTIFIED SOIL OF FINE GRADE AND SHALL MEET AUSTRALIAN STANDARD 4419-2003.

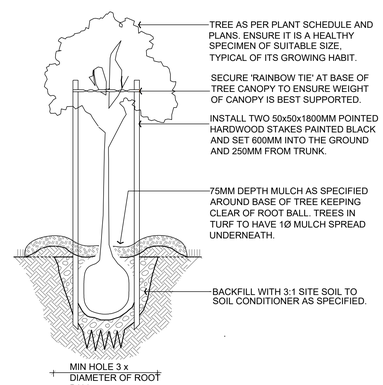
1.3. GENERAL PLANTING INSTRUCTIONS
- REMOVE ALL PLANTS FROM THEIR CONTAINERS, IN SUCH A MANNER AS TO DO AS LITTLE DISTURBANCE AS POSSIBLE TO THE ROOTS. WHERE NECESSARY, GENTLY TEASE OUT ROOTBALLS BEFORE PLANTING. PLACE TREES, SHRUBS AND PLANTS IN HOLES IN A STRAIGHT, UP-RIGHT POSITION AND BACKFILL LEVEL WITH TOP OF ROOTBALL. COMPACT SOIL BY HAND.
- REFER DETAILS 'TREE PLANTING DETAIL' AND 'SHRUB PLANTING DETAIL'.
- ROOT BARRIERS SHALL BE INSTALLED FOR TREES.

1.4 FERTILISING
- AFTER PLANTING AND AT TIME OF BACK FILLING ALL PLANTS ARE TO RECEIVE APPROVED PROPRIETY ITEM OF EIGHT TO NINE MONTH SLOW-RELEASE FERTILISER SUITABLE FOR AUSTRALIAN NATIVE PLANTS.
- FERTILISER TO BE APPLIED IN BACKFILL (BELOW GROUND) DURING PLANTING AT THE MANUFACTURERS' RECOMMENDED RATE FOR THE RELATIVE PLANT SIZE, AND AT A MINIMUM RATE AS FOLLOWS:
  - - 30 - 45 LITRE POT SIZE PLANTS TO HAVE FORTY GRAMS
  - - 13CM - 14CM POT SIZE PLANTS TO HAVE TEN GRAMS

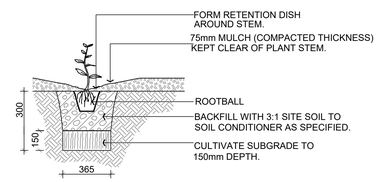
2. MULCH
- ALL MULCH SHALL MEET AUSTRALIAN STANDARD 4454-2012.
- SITE MULCH SHALL BE PLAYGROUND APPROVED FINE GRADE WOOD CHIPS SPREAD TO A DEPTH OF 75MM.
- VERGE MULCH SHALL BE CHUNKY PINE BARK WOOD CHIPS SPREAD TO 75MM.
- MULCH IS TO BE COMPLETELY FREE OF ALL NOXIOUS WEEDS, SEEDS AND FUNGUS, INSECT PESTS AND OTHER DELETERIOUS MATERIAL.
- TIDY AND GRADE MULCH AFTER APPLICATION, FINISHING 20MM BELOW SURROUNDING HARD SURFACES.

3. IRRIGATION
- ALL GARDEN BEDS AND BUILT-IN PLANTER TO BE IRRIGATED. INSTALL A SUB-MULCH DRIP SYSTEM FOR ALL GARDEN BEDS AND INDIVIDUAL BUBBLER FOR TREES.
- CONTROLLER TO BE AUTOMATIC SYSTEM WITH RAIN SENSOR. LOCATION TO BE CONFIRMED ON SITE.
- THE CONTRACTOR IS RESPONSIBLE FOR LAYOUT DESIGN AND INSTALLATION OF IRRIGATION SYSTEM.
- AT TIME OF COMPLETION THE IRRIGATION SYSTEM SHALL BE FULLY AUTOMATED, WORKING EFFICIENTLY AND EFFECTIVELY AND WATERING TIMES PROGRAMMED.

TYPICAL DRAWINGS



1 TREE PLANTING DETAIL
TYPICAL SECTION
NOT TO SCALE



2 13-14cm POT PLANTING DETAIL
TYPICAL SECTION
NOT TO SCALE

THIS PLAN MUST BE PRINTED IN BEST QUALITY COLOUR PRINT

URBAN Retreat GARDEN DESIGN

rev	description	drawn	checked	date
D	DEVELOPMENT APPLICATION	AC	AC	18.08.2025
C	DEVELOPMENT APPLICATION	AC	AC	16.07.2024
B	DEVELOPMENT APPLICATION	AC	AC	29.04.2024
A	DEVELOPMENT APPLICATION	AC	AC	12.03.2024

project: PROPOSED CHILDCARE CENTRE
location: 147 BURSWOOD ROAD, BURSWOOD, WA
client: ELVEN PROPERTY

URBAN RETREAT GARDEN DESIGN
COMMERCIAL AND RESIDENTIAL LANDSCAPE DESIGN SERVICES
www.urbanretreatgardens.com.au
E.amelia@urbanretreatgardens.com.au
M.0438 926 313

scale: 1:200 @ B1 | project no: 24285 | dwg no: L-01 | rev: 03
description: LANDSCAPE PLAN



Transport Impact Statement

Project:	Proposed Commercial Development 147 Burswood Road, Burswood
Client:	Elven Property
Author:	Liomar De Leon
Date:	3rd July 2024
Shawmac Document #:	2402007-TIS-001

CONSULTING CIVIL AND TRAFFIC ENGINEERS
1 ST. FLOOR, 908 ALBANY HIGHWAY, EAST VICTORIA PARK WA 6101.
PHONE|+61 8 9355 1300
EMAIL| admin@ shawmac.com.au

Document Status: Client Review

Version	Prepared By	Reviewed By	Approved By	Date
A	L. De Leon	P. Nguyen	P. Nguyen	18/04/2024
B	L. De Leon	-	P. Nguyen	03/07/2024

Disclaimer

Although all care has been taken in the preparation of this document, Shawmac Pty Ltd and all parties associated with the preparation of this document disclaim any responsibility for any errors or omissions. Shawmac Pty Ltd reserves the right to amend or change this document at any time. This document does not constitute an invitation, agreement or contract (or any part thereof) of any kind whatsoever. Liability is expressly disclaimed by Shawmac Pty Ltd for any loss or damage which may be sustained by any person acting on this document.

© Shawmac Pty. Ltd. 2024 ABN 51 828 614 001

File Reference: \\shawmacserver\NewData\Jobs Active 2024\T&T - Traffic & Parking\Elven Property_147 Burswood Rd, Burswood_TIS_2402007\3. Documents\3.20 TIS\Elven Property_147 Burswood Rd, Burswood_TIS_2402007 - Rev B.docx

Contents

1 Introduction 4

1.1 Proponent 4

1.2 Site Location 4

2 Proposed Development 6

2.1 Land Use 6

3 Traffic Management on Frontage Streets 8

3.1 Road Network Layout and Hierarchy 8

3.2 Speed Limits 9

3.3 Traffic Counts 10

4 Parking and Access 12

4.1 Parking Requirements 12

4.2 Parking Layout 13

4.3 Access Arrangement 14

4.4 Service Vehicles 14

5 Traffic Assessment 15

5.1 Traffic Generation 15

5.2 Traffic Distribution 16

6 Pedestrian and Cyclist Demand and Facilities Assessment 19

6.1 Existing Pedestrian / Cycle Networks 19

6.2 Bicycle Parking Requirements 19

7 Public Transport Accessibility 20

8 Road Safety Assessment 21

8.1 Crash History 21

9 Conclusion 22

Appendix A – Swept Path Analysis 23

Figures

Figure 1: General Site Location 4
Figure 2: Existing Site (January 2024) 5
Figure 3: Ground and First Floor Plans – Office and Child Care Centre 7
Figure 4: Road Layout and Hierarchy 8
Figure 5: Speed Limits 9
Figure 6: Average Weekday Traffic 10
Figure 7: Austroads Typical Mid-block Capacities for Urban Roads 11
Figure 8: Available Public Parking 12
Figure 9: Classification of Parking Facilities 13
Figure 10: Vehicle Access Arrangement 14
Figure 11: Traffic Distribution 16
Figure 12: Entering Traffic Flow 17
Figure 13: Exiting Traffic Flow 18
Figure 14: Existing Footpath Network 19
Figure 15: Crash History – January 2019 to December 2023 21

Tables

Table 1: LPP23 Car Parking Requirements 12
Table 2: AS2890.1 Car Parking Compliance 13
Table 3: Proposed Trip Generation – Child Care Centre / Office 15
Table 4: ITE Traffic Distribution 16
Table 5: Development - Entering and Exiting Volumes 17
Table 6: Development – Volumes To/From the North and South 17

1 Introduction

1.1 Proponent

Shawmac has been engaged by Elven Property to prepare a Transport Impact Statement (TIS) for a proposed commercial and child care centre development in Burswood. This TIS has been prepared in accordance with the WAPC *Transport Impact Assessment Guidelines* (TIA guidelines).

1.2 Site Location

The site address is 147 Burswood Road in Burswood. The local authority is the Town of Victoria Park. The general site location is shown in Figure 1.



Figure 1: General Site Location

An aerial view of the site is shown in Figure 2.



Figure 2: Existing Site (January 2024)

2 Proposed Development

2.1 Land Use

The proposed development is a two-storey building with a commercial tenancy and car parking on the ground level and a child care centre on the upper floor. The child care centre will accommodate up to 85 children and 17 staff.

The site previously had a small commercial building which has since been removed. The site is zoned as Office/Residential under the Town of Victoria Park Local Planning Scheme No. 1 (LPS1). The site is surrounded by other commercial development along Burswood Road and residential dwellings to the east.

It has been advised that the site under the causeway precinct background report (2009) requires a mandatory residential land use. The client acknowledges this requirement and there is potential to redevelop the site in the future.

The proposed site layout is shown in Figure 3.

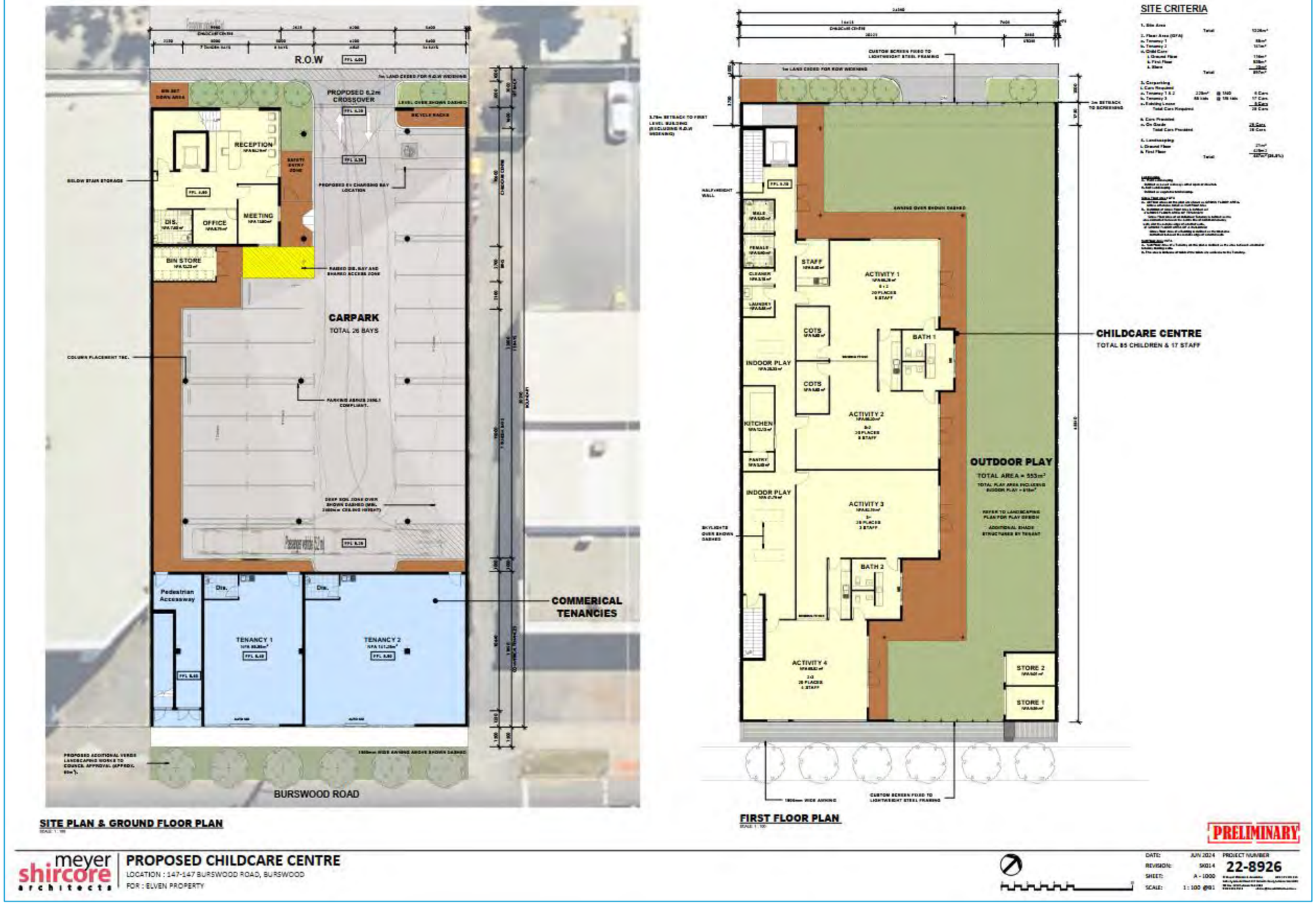


Figure 3: Ground and First Floor Plans – Office and Child Care Centre

3 Traffic Management on Frontage Streets

3.1 Road Network Layout and Hierarchy

The current layout and hierarchy of the surrounding road network according to Main Roads WA's *Road Information Mapping System* is shown in Figure 4.

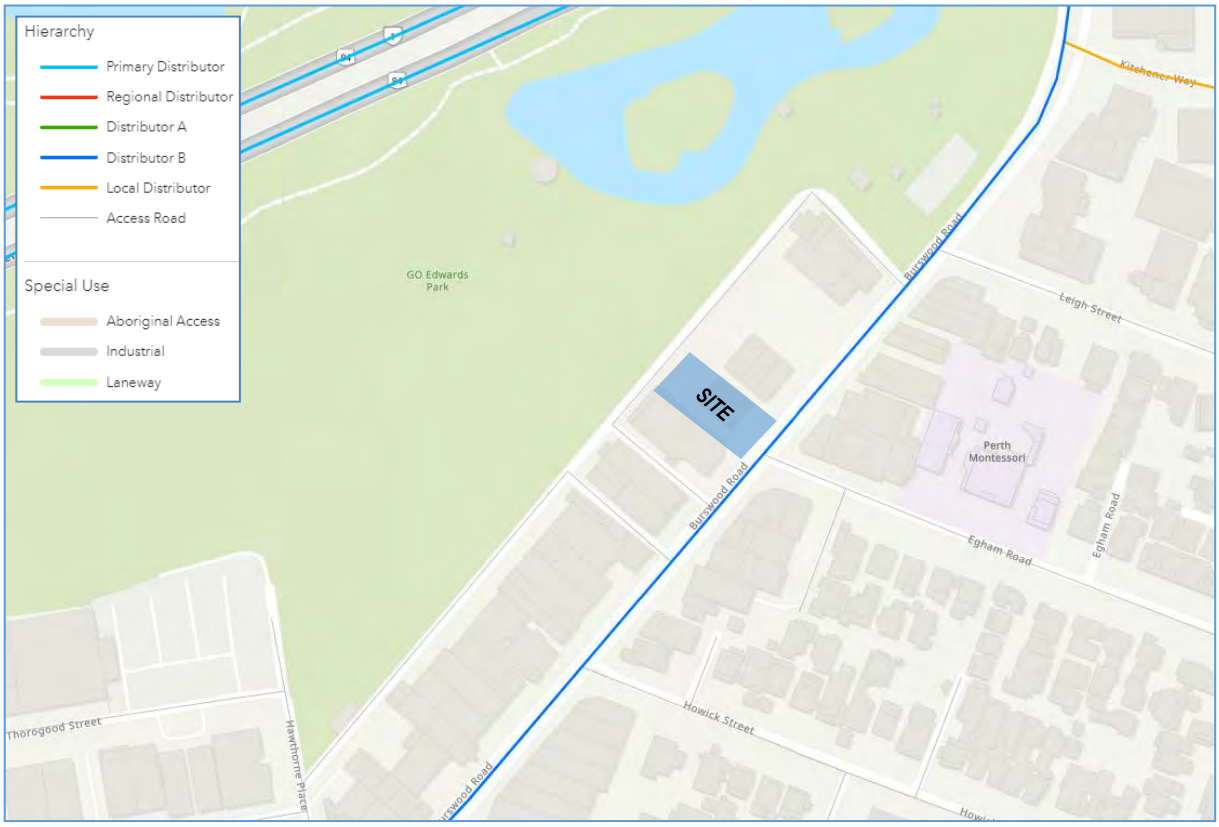


Figure 4: Road Layout and Hierarchy

3.2 Speed Limits

The current speed limits are shown in Figure 5.

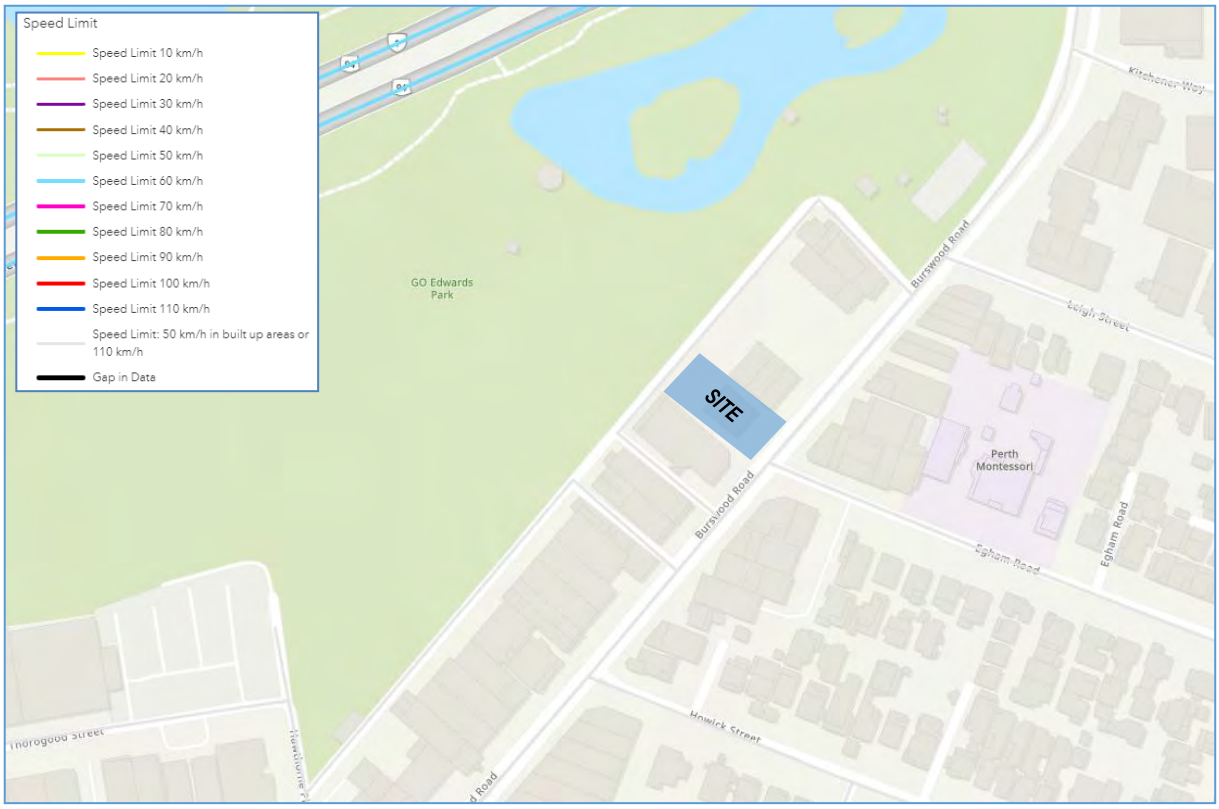


Figure 5: Speed Limits

3.3 Traffic Counts

The latest traffic volumes on the road network were sourced from Main Roads WA's *Traffic Map* as shown in Figure 6. The closest traffic counts are at the existing signalised intersection (ID: LM01167) at Great Eastern Highway / Victoria Park Drive / Burswood Road as shown in Figure 6.

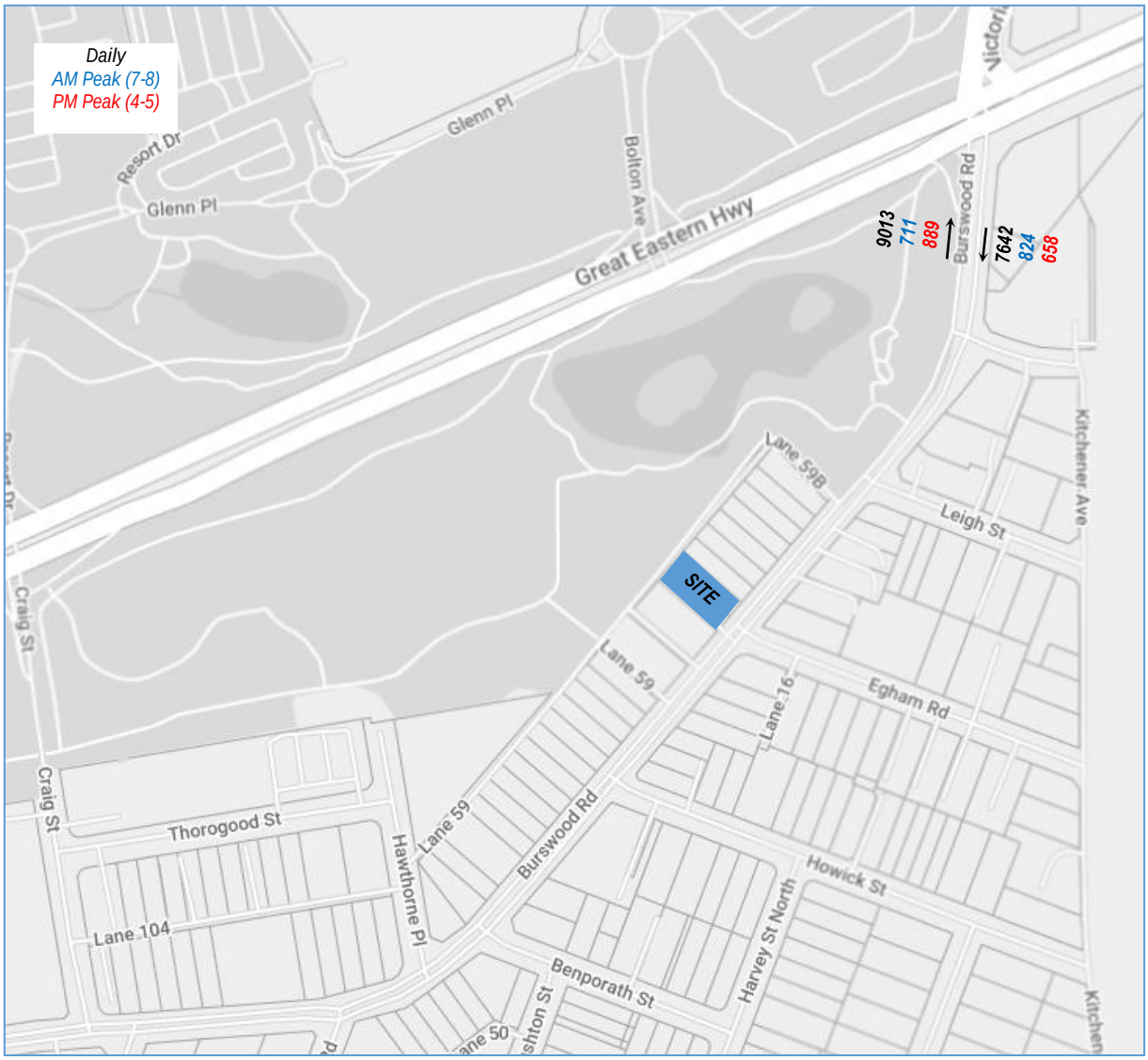


Figure 6: Average Weekday Traffic

The actual traffic volumes along Burswood Road in the vicinity of the site are likely to be much lower than noted above as a moderate proportion of traffic will turn to and from Kitchener Avenue.

The TIA Guidelines refers to Austroads *Guide to Traffic Management* for assessment of the impact of changes in traffic flows on the surrounding road network. The typical mid-block capacities for urban roads according to Austroads *Guide to Traffic Management Part 3: Traffic Studies and Analysis* are detailed in Figure 7.

Table 5.1: Typical mid-block capacities for urban roads with interrupted flow

Type of lane	One-way mid-block capacity (pc/h)
Median or inner lane	
Divided road	1000
Undivided road	900
Middle lane (of a 3 lane carriageway)	
Divided road	900
Undivided road	1000
Kerb lane	
Adjacent to parking lane	900
Occasional parked vehicles	600
Clearway conditions	900

Source: Table 5.1 in Austroads (2013).

Figure 7: Austroads Typical Mid-block Capacities for Urban Roads

The typical mid-block lane capacity of the adjacent roads is therefore approximately 900 vehicles per hour (vph) where there is no parking or a parking lane and 600 vph where there are occasional parked vehicles. There is intermittent parking along both sides of Burswood Road but the traffic lanes are wide enough for vehicles to pass by parked vehicles and so the theoretical mid-block capacity is estimated to be 900vph per direction.

The current mid-block peak hour traffic flows are below 900vph per hour in each direction and are therefore within the current mid-block capacity of the road.

4 Parking and Access

4.1 Parking Requirements

The car parking requirements for non-residential development in the Town of Victoria Park are outlined in the City's Local Planning Policy 23 (LPP23). The non-residential parking requirements are calculated in Table 1.

Table 1: LPP23 Car Parking Requirements

Land Use	Requirement	Quantum	Required Bays
Child Care Facilities	1 bay for every 5 children	85	17
Office	1 bay for every 40m^2 of Net Floor Area (NFA)	225m^2	6
		Total	23

As shown, the proposed development requires a minimum of 23 parking spaces. It has been advised that the client is the owner of the adjacent building and has agreed to lease 5 parking bays to the neighbouring tenants. Therefore, the site is required to provide 28 parking bays. The site proposes to provide 26 bays which is 2 bay short of the calculated requirement.

The minor shortfall is considered acceptable as there is ample available public parking along Burswood Road as shown in Figure 8.

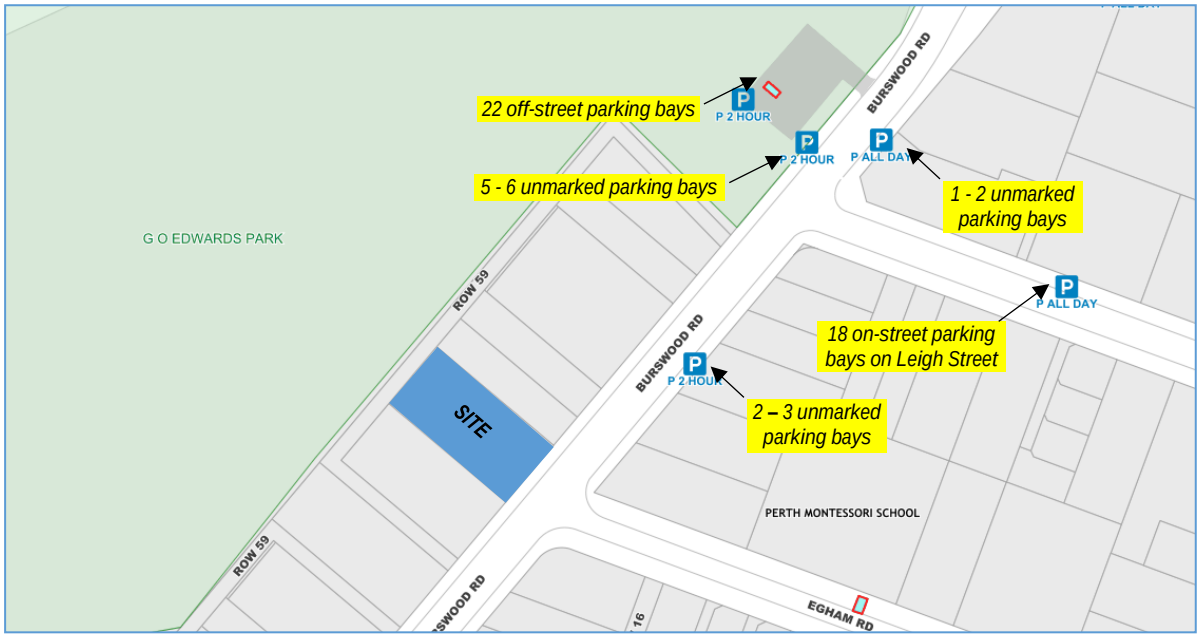
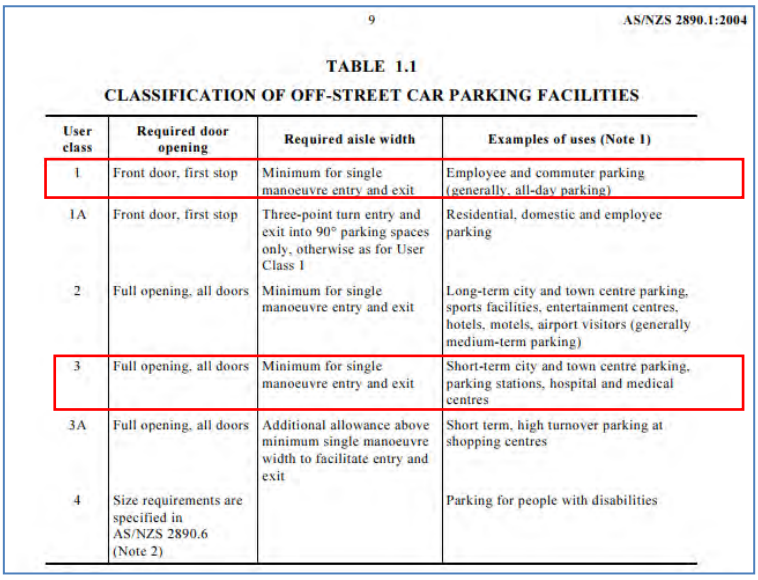


Figure 8: Available Public Parking

4.2 Parking Layout

The parking layout will need to comply with the requirements of Australian Standard AS2890.1. The user class will depend on the purpose of the bay as detailed in Figure 9.



9 AS/NZS 2890.1:2004

TABLE 1.1

CLASSIFICATION OF OFF-STREET CAR PARKING FACILITIES

User class	Required door opening	Required aisle width	Examples of uses (Note 1)
1	Front door, first stop	Minimum for single manoeuvre entry and exit	Employee and commuter parking (generally, all-day parking)
1A	Front door, first stop	Three-point turn entry and exit into 90° parking spaces only, otherwise as for User Class 1	Residential, domestic and employee parking
2	Full opening, all doors	Minimum for single manoeuvre entry and exit	Long-term city and town centre parking, sports facilities, entertainment centres, hotels, motels, airport visitors (generally medium-term parking)
3	Full opening, all doors	Minimum for single manoeuvre entry and exit	Short-term city and town centre parking, parking stations, hospital and medical centres
3A	Full opening, all doors	Additional allowance above minimum single manoeuvre width to facilitate entry and exit	Short term, high turnover parking at shopping centres
4	Size requirements are specified in AS/NZS 2890.6 (Note 2)		Parking for people with disabilities

Staff

Child Care Centre (pick up / Drop Off)

Figure 9: Classification of Parking Facilities

Staff parking (long term parking) would be classified as User Class 1. Pick-up and drop-off parking (short term parking) would most likely be classified as User Class 3.

An assessment of the AS2890.1 parking requirements is detailed in Table 2.

Table 2: AS2890.1 Car Parking Compliance

Dimension	Requirement	Provided
90 degree parking – Class 1 – Long Term Parking (Staff) - Office		
Car Bay Width	2.4m	2.6m
Car Bay Length	5.4m	5.4m
Car Bay Length (tandem bay)	10.0m	10.0m
Parking Aisle Width	5.8m	6.2m
End of Aisle Extension	1.0m	1.0m
90 degree parking – Class 3 – Short Term Parking (Pick-up / Drop-off) – Child Care Centre		
Car Bay Width	2.6m	2.6m
Car Bay Length	5.4m	5.4m
Car Bay Length (tandem bay)	10.0m	10.0m
Parking Aisle Width	5.8m	6.2m
End of Aisle Extension	1.0m	1.0m

As shown, all relevant parking layout dimensions are compliant with AS2890.1 requirements.

Swept path analysis of the end parking bays were undertaken in AutoTURN 11 using the Australian Standard B85 as demonstrated in Appendix A – Swept Path Analysis. The swept path assessment concluded that a vehicle is able to enter and exit the end parking spaces.

4.3 Access Arrangement

Access to the site is proposed along the existing laneway located at the rear of the site. No vehicle access is proposed along Burswood Road.

The proposed access arrangement is shown in Figure 10. The existing laneway access is shown in green and the proposed access to the site is in red.

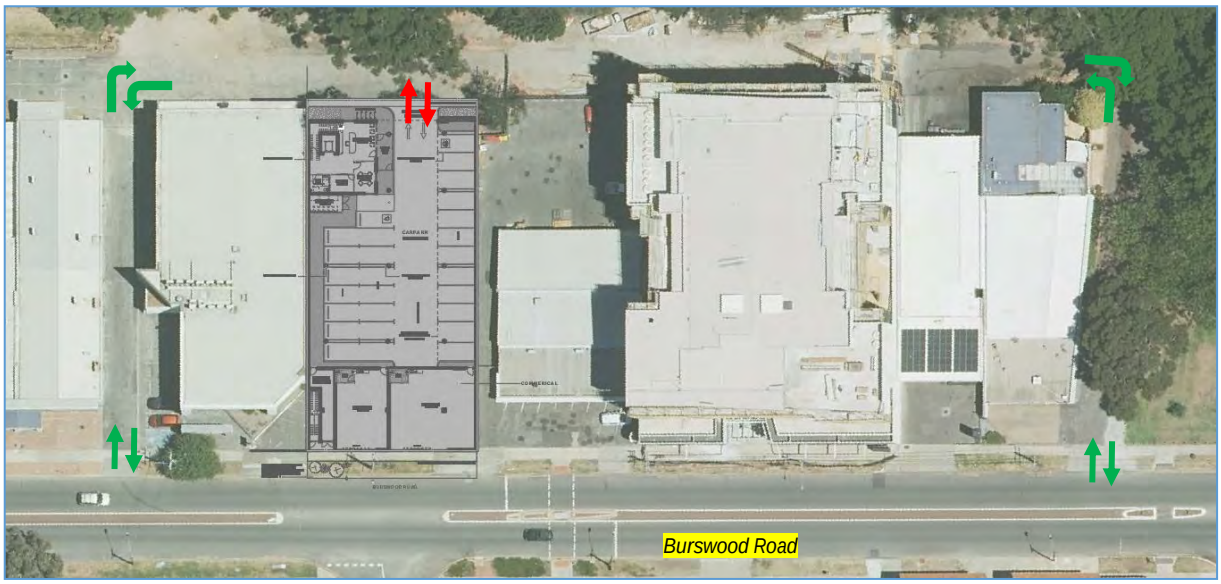


Figure 10: Vehicle Access Arrangement

The Town of Victoria Park has no driveway crossover specification for commercial uses. No changes to the existing access arrangements are proposed and so no further assessment is considered necessary.

4.4 Service Vehicles

As advised by the client, the proposed development will be serviced by vans and other light vehicles. Loading and unloading will be undertaken on site via the proposed parking bays.

Waste will be collected from the laneway as per the existing arrangement and so there will be no requirement to accommodate waste vehicles on the site. A building caretaker will need to transport the bins to and from the laneway. It is recommended that service vehicle movements are scheduled outside of peak periods where possible to minimise the impact on traffic.

5 Traffic Assessment

5.1 Traffic Generation

The volume of traffic generated by the proposed development has been estimated using trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual 11th Edition.*

The closest land use for the child care centre and office is determined to be *"Day Care Centre (565)"* and *"General Office Building (710)".*

The proposed trip generation is calculated in Table 3.

Table 3: Proposed Trip Generation – Child Care Centre / Office

Land Use	Units	Quantity	Generation Rate			Number of Trips		
			Daily	AM Peak	PM Peak	Daily	AM Peak	PM Peak
Child Care Centre	Children	85 Children	4.09	0.78	0.79	348	67	68
Office	100m² GFA	225m² GFA	11.67	1.64	1.55	27	4	4
Total						375	71	72

As shown, the proposed development is predicted to generate approximately 375 daily trips and 71 trips during the morning peak hour and 72 during the afternoon peak hour.

According to the WAPC TIA guidelines, an increase of between 10 to 100 peak hour vehicles is considered to have a low to moderate impact and is generally deemed to be acceptable without requiring detailed capacity analysis. The estimated 71 to 72 vehicles per hour is at the higher end of this range and so the development traffic is considered to have a moderate impact and can be accommodated within the existing capacity of the road network.

5.2 Traffic Distribution

Based on the location of the site and the layout of the road network, the traffic generated by the development is assumed to be distribution evenly along Burswood Road towards Great Eastern Highway to the north and Shepperton Road to the south as summarised in Figure 11.

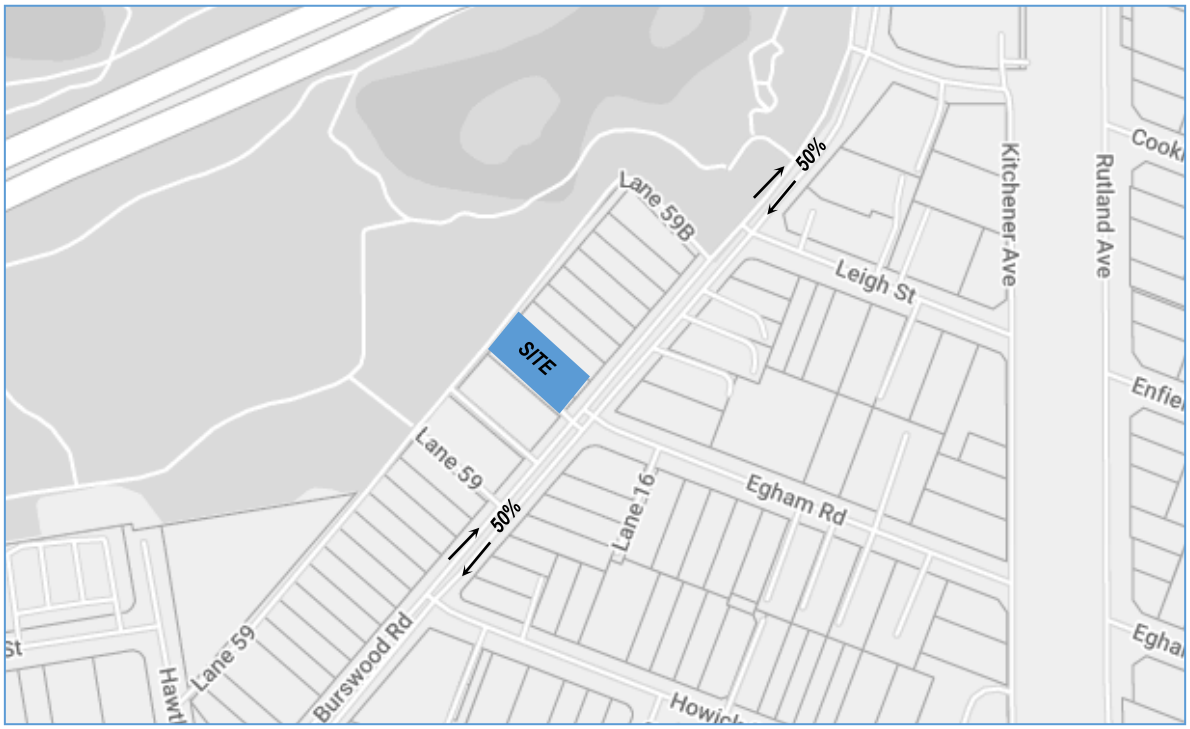


Figure 11: Traffic Distribution

The Institute of Transportation Engineers (ITE) *Trip Generation* provides a directional distribution of the daily, entering and exiting percentages for the land use *"Day Care Centre (565)"* and *"General Office Building (710)"* as shown in Table 4.

Table 4: ITE Traffic Distribution

Land Use	Units	Daily		AM Peak		PM Peak	
		Entering	Exiting	Entering	Exiting	Entering	Exiting
Child Care Centre	Children	50%	50%	53%	47%	47%	53%
Office	100m^2 GFA	*50%*	*50%*	*88%*	*12%*	17%	83%

The entering and exiting vehicle volumes are summarised and calculated in Table 5.

Table 5: Development - Entering and Exiting Volumes

Land Use	Units	Daily		AM Peak		PM Peak	
		Entering	Exiting	Entering	Exiting	Entering	Exiting
Child Care Centre	Children	174	173	35	32	32	36
Office	100m² GFA	13	13	3	1	3	1
Total		187	187	39	32	33	39

Table 6: Development – Volumes To/From the North and South

Land Use	Units	Daily		AM Peak		PM Peak	
		Entering	Exiting	Entering	Exiting	Entering	Exiting
To/from the North		94	94	20	16	17	20
To/from the South		93	93	19	16	16	19
Total		187	187	39	32	33	39

The peak hour traffic movements to and from the development are shown in Figure 12 and Figure 13.



Figure 12: Entering Traffic Flow



Figure 13: Exiting Traffic Flow

According to the WAPC TIA Guidelines, an increase less than 100vph would not normally be likely to have a material impact on any particular section of road.

As shown in Figure 12 and Figure 13, the proposed development is well below 100vph and so will not have a material impact on the existing road and further detailed analysis is not warranted.

6 Pedestrian and Cyclist Demand and Facilities Assessment

6.1 Existing Pedestrian / Cycle Networks

The existing path network in the surrounding area is shown in Figure 14. The footpaths are shown in yellow.

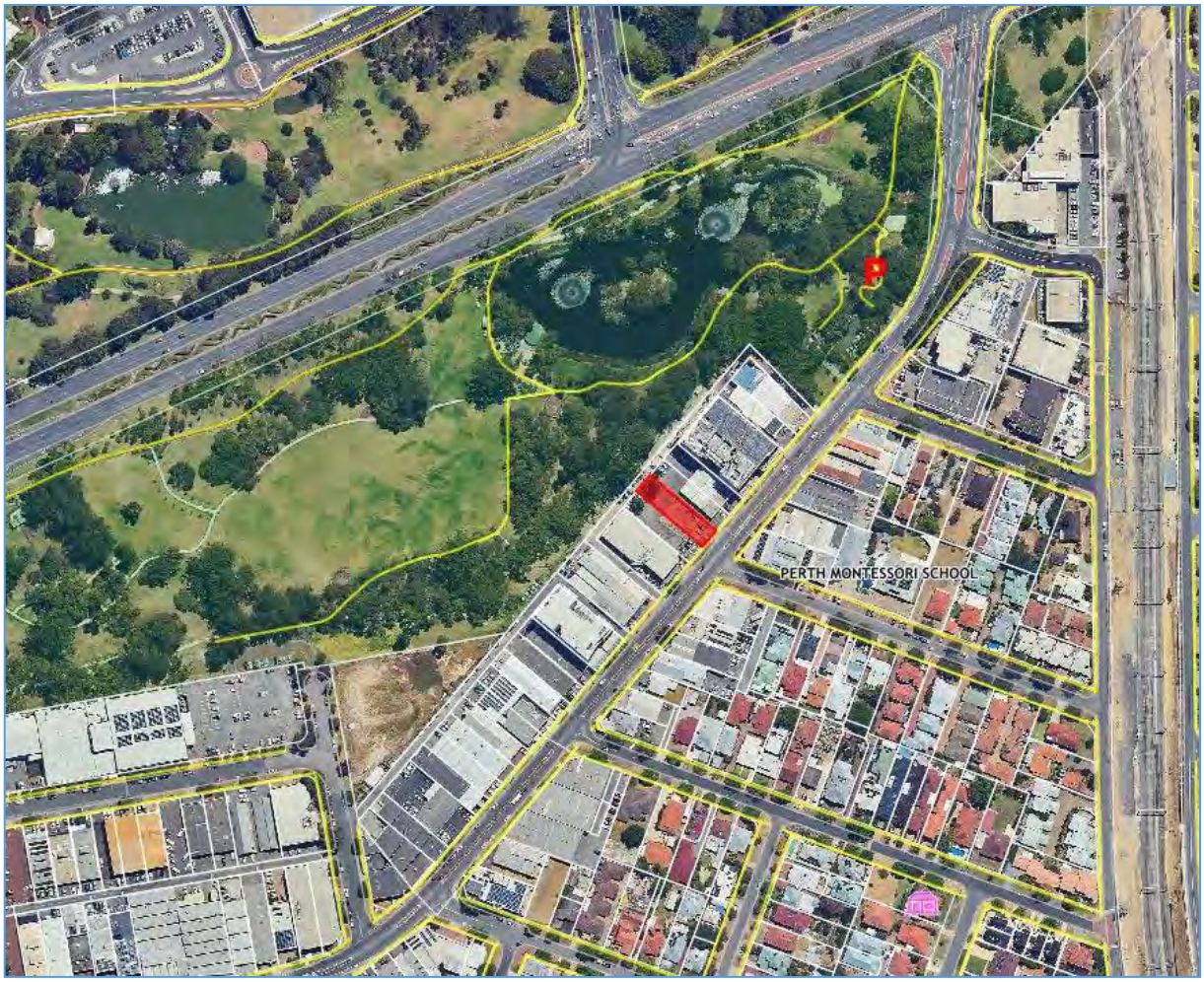


Figure 14: Existing Footpath Network

As shown, majority of the surrounding roads have paths or walkways along at least one side of the road. The existing path network is well established and is considered to be adequate to allow the safe movement of pedestrians and cyclists to and from the site.

6.2 Bicycle Parking Requirements

The Town of Victoria Path Local Planning Policy does not specify the required bicycle parking requirements.

The site proposes to provide 6 bicycle racks on site which are considered to be adequate based on the size of the development and proposed uses.

7 Public Transport Accessibility

The following public transport services currently operate within short walking distance of the site:

- Transperth Bus Route 39 which operates between Perth and Redcliffe Station via Star Street and Belmont Forum Shop Centre. This route operates every 15 minutes during the weekday and 30 minutes during the weekend.
- Transperth Bus Route 270 which operates between High Wycome Station and Perth via Kewdale and Belmont Forum Shop Centre.
- Transperth Bus Route 935 which operates between Redcliffe Station and Kings Park via Belmont Forum and Perth Shop Centre.
- Transperth Bus Route 940 which operates between Perth and Redcliffe Station via Great Eastern Highway.

The bus routes 270, 935 and 940 operates every 15 minutes during the weekday and 30 – 60 minutes during the weekend.

The closest bus stop located on Great Eastern Highway located to the north of the site. Access to this bus stop can be made via through GO Edwards Park (300m) or along Burswood Road to the north-east (650m walking distance).

The existing public transport services are expected to be adequate to meet the likely demand.

8 Road Safety Assessment

8.1 Crash History

The crash history of the adjacent road network was obtained from the Main Roads WA's Reporting Centre. A summary of crashes recorded over the 5 year period from January 2019 to December 2023 is shown in Figure 15.

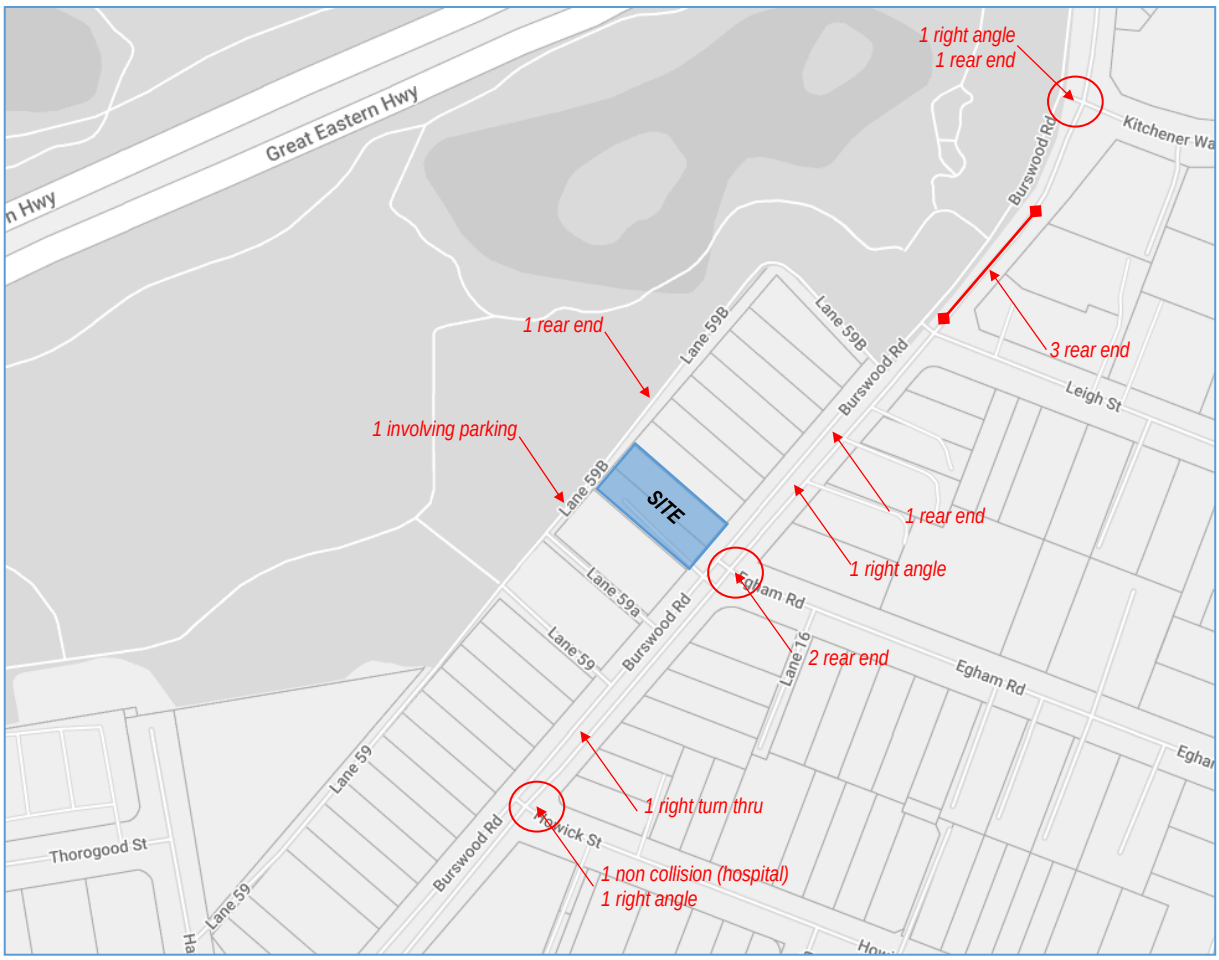


Figure 15: Crash History – January 2019 to December 2023

As shown, the number of crashes appears to be typical of the road environment and traffic volumes. Access to the site is via the existing laneway. There is no indication that the proposed development would increase the risk of crashes to an unacceptable level.

9 Conclusion

This Transport Impact Statement for the proposed office and child care centre development at 147 Burswood Road in Burswood concluded the following:

- The proposed development requires a minimum of 23 parking spaces. It has been advised that the client is the owner of the adjacent building and has agreed to lease 5 parking bays to the neighbouring tenants. Therefore, the site is required to provide 28 parking bays. The site proposes to provide 26 bays which is 2 bay short of the calculated requirement.
- The minor shortfall is considered acceptable as there is ample available public parking along Burswood Road
- The proposed parking layout dimensions are compliant with AS2890.1 requirements.
- The proposed development is predicted to generate approximately 375 daily trips and 71 trips during the morning peak hour and 72 during the afternoon peak hour.
- According to the WAPC TIA guidelines, an increase of between 10 to 100 peak hour vehicles is considered to have a low to moderate impact and is generally deemed to be acceptable without requiring detailed capacity analysis. The estimated 71 to 72 vehicles per hour is at the higher end of this range and so the development traffic is considered to have a moderate impact and can be accommodated within the existing capacity of the road network.
- The existing path network is well established and is considered to be adequate to allow the safe movement of pedestrians and cyclists to and from the site.
- The crash history on the adjacent road network is relatively low and does not appear to indicate any major safety issue. There is no indication that the development will increase the risk of crashes to an unacceptable level.
- The existing public transport services are expected to be adequate to meet the likely demand.

Appendix A – Swept Path Analysis

PARKING AS/NZS 2890.1
COMPLIANT.

7 Carbays

8 Carbays

2600mm X 5400mm

DEEP SOIL ZONE OVER
SHOWN DASHED (3200mm
CEILING HEIGHT)

Pedestrian
Accessway

Dis.

Dis.

PARKING AS/NZS 2890.1
COMPLIANT.

7 Carbays

8 Carbays

2600mm X 5400mm

DEEP SOIL ZONE OVER
SHOWN DASHED (3200mm
CEILING HEIGHT)

Dis.

Dis.

Lloyd George Acoustics
PO Box 717
Hillarys WA 6923
T: 9401 7770
www.lgacoustics.com.au

Noise Assessment – Childcare Centre

Lot 56 & 57 (#147) Burswood Road, Burswood

Reference: 24018685-01A

Prepared for:
Elven Property

Reference: 24018685-01A

Lloyd George Acoustics Pty Ltd
ABN: 79 125 812 544

PO Box 717
Hillarys WA 6923
www.lgacoustics.com.au

Contacts	General	Daniel Lloyd	Terry George	Matt Moyle
E:	info@lgacoustics.com.au	daniel@lgacoustics.com.au	terry@lgacoustics.com.au	matt@lgacoustics.com.au
P:	9401 7770	0439 032 844	0400 414 197	0412 611 330
Contacts	Rob Connolly	Daryl Thompson	Hao Tran	Matt Nolan
E:	rob@lgacoustics.com.au	daryl@lgacoustics.com.au	hao@lgacoustics.com.au	matt.nolan@lgacoustics.com.au
P:	0410 107 440	0420 364 650	0438 481 207	0448 912 604

This report has been prepared in accordance with the scope of services described in the contract or agreement between Lloyd George Acoustics Pty Ltd and the Client. The report relies upon data, surveys, measurements and results taken at or under the particular times and conditions specified herein. Any findings, conclusions or recommendations only apply to the aforementioned circumstances and no greater reliance should be assumed or drawn by the Client. Furthermore, the report has been prepared solely for use by the Client, and Lloyd George Acoustics Pty Ltd accepts no responsibility for its use by other parties.

Date	Rev	Description	Author	Verified
19-Mar-24	0	Issued to Client	Matt Nolan	Matt Moyle
22-Apr-24	A	Minor updates to drawings (no updates to the assessment)	Matt Nolan	-

CONTENTS

EXECUTIVE SUMMARY i

1. INTRODUCTION 1

2. CRITERIA 3

2.1. Environmental Noise 3

2.1.1. Regulations 7, 8 & 9 3

2.1.2. Regulation 3 6

2.1.3. Regulation 14A 6

2.2. Road Traffic Noise 7

3. METHODOLOGY 8

3.1. Environmental Noise Modelling 8

3.1.1. Meteorological Conditions 8

3.1.2. Topographical Data 8

3.1.3. Ground Absorption 9

3.1.4. Source Sound Levels 10

3.2. Transportation Noise 11

3.2.1. Transportation Site Measurements 11

3.2.2. Transportation Noise Modelling 12

4. RESULTS AND ASSESSMENT 14

4.1. Environmental Noise 14

4.1.1. Outdoor Child Play Noise 14

4.1.2. Mechanical Plant Noise 16

4.1.3. Car Door Closing Noise 18

4.1.4. Indoor Child Play 18

4.2. Transportation Noise 20

5. RECOMMENDATIONS 23

5.1. Environmental Noise 23

5.1.1. Child Play 23

5.1.2. Mechanical Plant 23

5.1.3. Car Doors 23

5.2. Transportation Noise 24

List of Tables

Table 2-1 Adjustments Where Characteristics Cannot Be Removed 3

Table 2-2 Baseline Assigned Levels 4

Table 2-3 Assigned Levels 5

Table 2-4: Noise Targets for Noise Sensitive Land-Use 7

Table 3-1: Modelling Meteorological Conditions 8

Table 3-2: Source Sound Power Levels, dB 10

Table 3-3: Noise Relationship Between Different Road Surfaces 13

Table 3-4: Traffic Information Used in Noise Modelling 13

Table 4-1: Child Play Noise Predicted Levels and Assessment, dB L_{A10} 14

Table 4-2: Mechanical Plant Noise Predicted Levels and Assessment, dB L_{A10} 16

Table 4-3: Car Door Closing Noise Predicted Levels and Assessment, dB L_{Amax} 18

Table B-1: Percentage of Land Types within 100m and 450m Radii 27

Table B-2: Relevant Roads within 100m and 450m Radii 29

Table B-3: Influencing Factor Calculation, dB 29

List of Figures

Figure 1-1: Subject Site Location (Source: DPLH PlanWA) 1

Figure 1-2: Proposed Site Plan 2

Figure 3-1: Overview of Noise Model 9

Figure 3-2: Photograph of Sound Level Meter on Site 11

Figure 3-3: Measurement Location 12

Figure 4-1: Child Play Noise Contour Plot 15

Figure 4-2: Mechanical Plant Noise Contour Plot 17

Figure 4-3: Car Door Closing Noise Contour Plot 19

Figure 4-4: Noise Level Relationship to Hourly Traffic Volumes 20

Figure 4-5: Future Road Traffic Noise Contours with Facade Correction (Upper Floor) 21

Figure 4-6: Future Road Traffic Noise Contours No Facade Correction (Upper Floor) 22

Figure B-1: Land Types within 100m and 450m Radii 28

Appendices

Appendix A – Development Plans 25

Appendix B – Influencing Factor Calculation 26

Appendix C – Terminology 30

EXECUTIVE SUMMARY

Lloyd George Acoustics was engaged by Elven Property to undertake a noise assessment for a proposed childcare centre (CCC) to be located at Lot 56 & 57 (#147) Burswood Road, Burswood. This report considered noise emissions from the proposed childcare centre to surrounding properties, as well as the impact of road traffic noise to the childcare centre.

With regard to the noise emission assessment, this was undertaken using noise modelling and considered child play, mechanical plant and car door closings. The noise from all children playing outside and car door closings is predicted to be compliant. Mechanical plant noise was also calculated to be compliant, however once the plant has been designed and selected, this should be further reviewed to ensure compliance prior to Building Permit.

Predicted noise levels from road traffic, at the facade of the CCC Building, are above the outdoor noise target of *State Planning Policy No. 5.4 Road and Rail Noise*. During detailed design and prior to Building Permit, glazing construction shall be reviewed for sensitive areas within the CCC, in order to achieve acceptable internal noise levels. Noise levels to the outdoor play areas are generally considered compliant with the majority below the outdoor noise target.

1. INTRODUCTION

Lloyd George Acoustics was engaged by Elven Property to undertake a noise assessment for a proposed childcare centre (CCC) to be located at Lot 56 & 57 (#147) Burswood Road, Burswood (refer *Figure* 1-1) with the site plan shown in *Figure 1-2* and full Development Application (DA) plans provided in *Appendix A*. The purpose of this report is to consider noise emissions from the proposed childcare centre to surrounding properties, as well as the impact of road traffic noise to the childcare centre.



Figure 1-1: Subject Site Location (Source: DPLH PlanWA)

The proposed childcare centre will be open Monday to Friday, 6.30am to 6.30pm and consist of the following:

- Four internal teaching spaces located on the first floor capable of accommodating up to 85 children, grouped as follows:
  - Activity 1 & 2: Each with 20 places for children aged 0-2 years;
  - Activity 3: 25 places for children aged 3+ years;
  - Activity 4: 20 places for children aged 2-3 years.
- Outdoor play area located on the first floor (not used prior to 7.00am);
- Amenities and associated mechanical plant such as:
  - Kitchen exhaust fan assumed to be located on roof above;
  - Various exhaust fans (toilets, laundry, nappy room) assumed to be located on the roof above;
  - Air-conditioning (AC) plant, assumed to located on the roof;
- Car parking on the ground floor of the lot.



Figure 1-2: Proposed Site Plan

With regard to noise emissions, consideration is given to noise from child play, mechanical services and closing car doors at neighbouring properties, against the prescribed standards of the *Environmental Protection (Noise) Regulations 1997*.

With regard to road traffic noise impacts, the childcare centre is considered noise sensitive and is located within approximately 162 metres from Great Eastern Highway. This road is considered a 'Strategic Freight/Major Traffic Route' in accordance with the PlanWA Maps and as such, a noise assessment is required against *State Planning Policy No. 5.4 Road and Rail Noise*.

Appendix C contains a description of some of the terminology used throughout this report.

2. CRITERIA

2.1. Environmental Noise

Environmental noise in Western Australia is governed by the *Environmental Protection Act 1986*, through the *Environmental Protection (Noise) Regulations 1997* (the Regulations).

2.1.1. Regulations 7, 8 & 9

This group of regulations defines the prescribed standard for noise emissions applicable to child play, mechanical services and car door closing as follows:

*"**7. Prescribed standard for noise emissions***

(1) Noise emitted from any premises or public place when received at other premises –

(a) must not cause, or significantly contribute to, a level of noise which exceeds the assigned level in respect of noise received at premises of that kind; and

(b) must be free of –

(i) tonality; and

(ii) impulsiveness; and

(iii) modulation,

when assessed under regulation 9.

(2) For the purposes of subregulation (1)(a), a noise emission is taken to significantly contribute to a level of noise if the noise emission … exceeds a value which is 5 dB below the assigned level at the point of reception."

Tonality, impulsiveness and modulation are defined in regulation 9 (refer *Appendix C*). Under regulation 9(3), *"Noise is taken to be free of the characteristics of tonality, impulsiveness and modulation if -*

(a) the characteristics cannot be reasonably and practicably removed by techniques other than attenuating the overall level of noise emission; and

(b) the noise emission complies with the standard prescribed under regulation 7(1)(a) after the adjustments in the table [Table 2-1] … are made to the noise emission as measured at the point of reception."

Table 2-1 Adjustments Where Characteristics Cannot Be Removed

Where Noise Emission is Not Music*			Where Noise Emission is Music	
Tonality	Modulation	Impulsiveness	No Impulsiveness	Impulsiveness
+ 5 dB	+ 5 dB	+ 10 dB	+ 10 dB	+ 15 dB

* These adjustments are cumulative to a maximum of 15 dB.

The assigned levels (prescribed standards) for all premises are specified in regulation 8(3) and are shown in *Table 2-2*. The L_{A10} assigned level is applicable to noises present for more than 10% of a representative assessment period, generally applicable to "steady-state" noise sources. The L_{A1} is for short-term noise sources present for less than 10% and more than 1% of the time. The L_{Amax} assigned level is applicable for incidental noise sources, present for less than 1% of the time.

Table 2-2 Baseline Assigned Levels

Premises Receiving Noise	Time Of Day	Assigned Level (dB)		
		L_{A10}	L_{A1}	L_{Amax}
Noise sensitive premises: highly sensitive area[1]	0700 to 1900 hours Monday to Saturday (Day)	45 + influencing factor	55 + influencing factor	65 + influencing factor
	0900 to 1900 hours Sunday and public holidays (Sunday)	40 + influencing factor	50 + influencing factor	65 + influencing factor
	1900 to 2200 hours all days (Evening)	40 + influencing factor	50 + influencing factor	55 + influencing factor
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and public holidays (Night)	35 + influencing factor	45 + influencing factor	55 + influencing factor
Noise sensitive premises: any area other than highly sensitive area	All hours	60	75	80
Commercial Premises	All hours	60	75	80
Industrial and Utility Premises	All hours	65	80	90

1. ***highly sensitive area*** means that area (if any) of noise sensitive premises comprising —
   (a) a building, or a part of a building, on the premises that is used for a noise sensitive purpose; and
   (b) any other part of the premises within 15 metres of that building or that part of the building.

The influencing factor (IF), in relation to noise received at noise sensitive premises, has been calculated as 11 dB, as determined in *Appendix B*. *Table 2-3* shows the assigned levels including the influencing factor and transport factor at the receiving locations.

Table 2-3 Assigned Levels

Premises Receiving Noise	Time Of Day	Assigned Level (dB)		
		L_{A10}	L_{A1}	L_{Amax}
+11 dB IF Noise sensitive premises: highly sensitive area[1]	0700 to 1900 hours Monday to Saturday (Day)	56	66	76
	0900 to 1900 hours Sunday and public holidays (Sunday)	51	61	76
	1900 to 2200 hours all days (Evening)	51	61	66
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and public holidays (Night)	46	56	66
Commercial Premises	All hours	60	75	80

It must be noted the assigned levels above apply outside the receiving premises and at a point at least 3 metres away from any substantial reflecting surfaces.

The assigned levels are statistical levels and therefore the period over which they are determined is important. The Regulations define the Representative Assessment Period (RAP) as "*a period of time of not less than 15 minutes, and not exceeding 4 hours*, *determined by* an *inspector* or *authorised person to be appropriate for the assessment of a noise emission, having regard to the type and nature of the noise emission"*. An inspector or authorised person is a person appointed under Sections 87 & 88 of the *Environmental Protection Act 1986* and include Local Government Environmental Health Officers and Officers from the Department of Water Environmental Regulation. Acoustic consultants or other environmental consultants are not appointed as an inspector or authorised person. Therefore, whilst this assessment is based on a 4-hour RAP, which is assumed to be appropriate given the nature of the operations, this is to be used for guidance only.

2.1.2. Regulation 3

"3. Regulations do not apply to certain noise emissions

(1) Nothing in these regulations applies to the following noise emissions –

(a) Noise emissions from the propulsion and braking systems of motor vehicles operating on a road;"

The childcare centre car park is considered a road and therefore vehicle noise (propulsion and braking) is not assessed. Noise from vehicle car doors however are assessed, since these are not part of the propulsion or braking system.

2.1.3. Regulation 14A

"14A. Waste Collection and Other Works

(2) Regulation 7 does not apply to noise emitted in the course of carrying out class 1 works if –

(a) The works are carried out in the quietest reasonable and practicable manner; and

(b) The equipment used to carry out the works is the quietest reasonably available;

class 1 works means specified works carried out between -

(a) 0700 hours and 1900 hours on any day that is not a Sunday or a public holiday; or

(b) 0900 hours and 1900 hours on a Sunday or public holiday.

specified works means -

(a) The collection of waste; or

(b) The cleaning of a road or the drains for a road; or

(c) The cleaning of public places, including footpaths, cycle paths, car parks and beaches;"

In the case where specified works are to be carried out outside of class 1, a noise management plan is to be prepared and approved by the CEO.

2.2. Road Traffic Noise

The criteria for road traffic noise is provided in *State Planning Policy No. 5.4 Road and Rail Noise* (hereafter referred to as SPP 5.4) produced by the Western Australian Planning Commission (WAPC). SPP 5.4 is supported by the *Road and Rail Noise Guidelines* (the Guidelines) and the Department of Planning, Lands and Heritage mapping. The objectives of SPP 5.4 are to:

- Protect the community from unreasonable levels of transport noise;
- Protect strategic and other significant freight transport corridors from incompatible urban encroachment;
- Ensure transport infrastructure and land-use can mutually exist within urban corridors;
- Ensure that noise impacts are addressed as early as possible in the planning process; and
- Encourage best practice noise mitigation design and construction standards.

Table 2-4 sets out noise targets that are to be achieved by proposals under which SPP 5.4 applies. Where the targets are exceeded, an assessment is required to determine the likely level of transport noise and management/mitigation required.

Table 2-4: Noise Targets for Noise Sensitive Land-Use

Scenario	Outdoor Noise Target		Indoor Noise Target	
Noise-sensitive land-use and/or development	55 dB $L_{Aeq(Day)}$	50 dB $L_{Aeq(Night)}$	40 dB $L_{Aeq(Day)}$ (Living and Work Areas)	35 dB $L_{Aeq(Night)}$ (Bedrooms)

Notes:

- Day period is from 6am to 10pm and night period from 10pm to 6am.
- The outdoor noise target is to be measured at 1-metre from the most exposed, habitable[1] facade of a noise sensitive building.
- For all noise-sensitive land-use and/or development, indoor noise targets for other room usages may be reasonably drawn from Table 1 of Australian Standard/New Zealand Standard AS/NZS 2107:2016 *Acoustics – Recommended Design Sound Levels and Reverberation Times for Building Interiors* (as amended) for each relevant time period.
- Outdoor targets are to be met at all outdoor areas as far as is reasonable and practicable to do so using the various noise mitigation measures outlined in the Guidelines.

The application of SPP 5.4 is to consider anticipated traffic volumes for the next 20 years from when the noise assessment has been undertaken.

In the application of the noise targets, the objective is to achieve:

- Indoor noise levels as specified in *Table 2-4* in noise-sensitive areas (e.g. activity and cot rooms); and
- A reasonable degree of acoustic amenity for outdoor play areas.

[1] *A habitable room is defined in State Planning Policy 3.1 as a room used for normal domestic activities that includes a bedroom, living room, lounge room, music room, sitting room, television room, kitchen, dining room, sewing room, study, playroom, sunroom, gymnasium, fully enclosed swimming pool or patio.*

3. METHODOLOGY

3.1. Environmental Noise Modelling

Computer modelling has been used to predict the noise emissions from the development to all nearby receivers. The software used was *SoundPLAN 9.0* with the ISO 9613 algorithms (ISO 17534-3 improved method) selected, as they include the influence of wind and are considered appropriate given the relatively short source to receiver distances. Input data required in the model are listed below and discussed in *Section 3.1.1* to *Section 3.1.4*:

- Meteorological Information;
- Topographical data;
- Ground Absorption; and
- Source sound power levels.

3.1.1. Meteorological Conditions

Meteorological information utilised is provided in *Table 3-1* and is considered to represent worst-case conditions for noise propagation. At wind speeds greater than those shown, sound propagation may be further enhanced, however background noise from the wind itself and from local vegetation is likely to be elevated and dominate the ambient noise levels.

Table 3-1: Modelling Meteorological Conditions

Parameter	Day (7.00am to 7.00pm)	Night (7.00pm to 7.00am)
Temperature (°C)	20	15
Humidity (%)	50	50
Wind Speed (m/s)	Up to 5	Up to 5
Wind Direction*	All	All

* The modelling package allows for all wind directions to be modelled simultaneously.

Alternatives to the above default conditions can be used where one year of weather data is available and the analysis considers the worst 2% of the day and night for the month of the year in which the worst-case weather conditions prevail (source: *Draft Guideline on Environmental Noise for Prescribed Premises*, May 2016). In most cases, the default conditions occur for more than 2% of the time and therefore must be satisfied.

3.1.2. Topographical Data

Topographical data was adapted from publicly available information (e.g. *Google*) in the form of spot heights and combined with the site plan.

Surrounding existing buildings were also incorporated in the noise model, as these can provide noise shielding as well as reflection paths. A six storey residential building located at 153-157 Burswood Road is currently under construction. The receiver locations and building design has been included in the model based on a prior noise assessment conducted for this property.

The childcare centre building is incorporated in the noise model as per the *Appendix A* plans. This includes a 9.5-metre wall on the northeast and southwest sides of the Childcare building.

Figure 3-1 shows a 2D overview of the noise model with the location of all relevant receivers identified. Pink dots represent point sources in the noise model (car doors, mechanical plant) with the pink polygon representing child play.

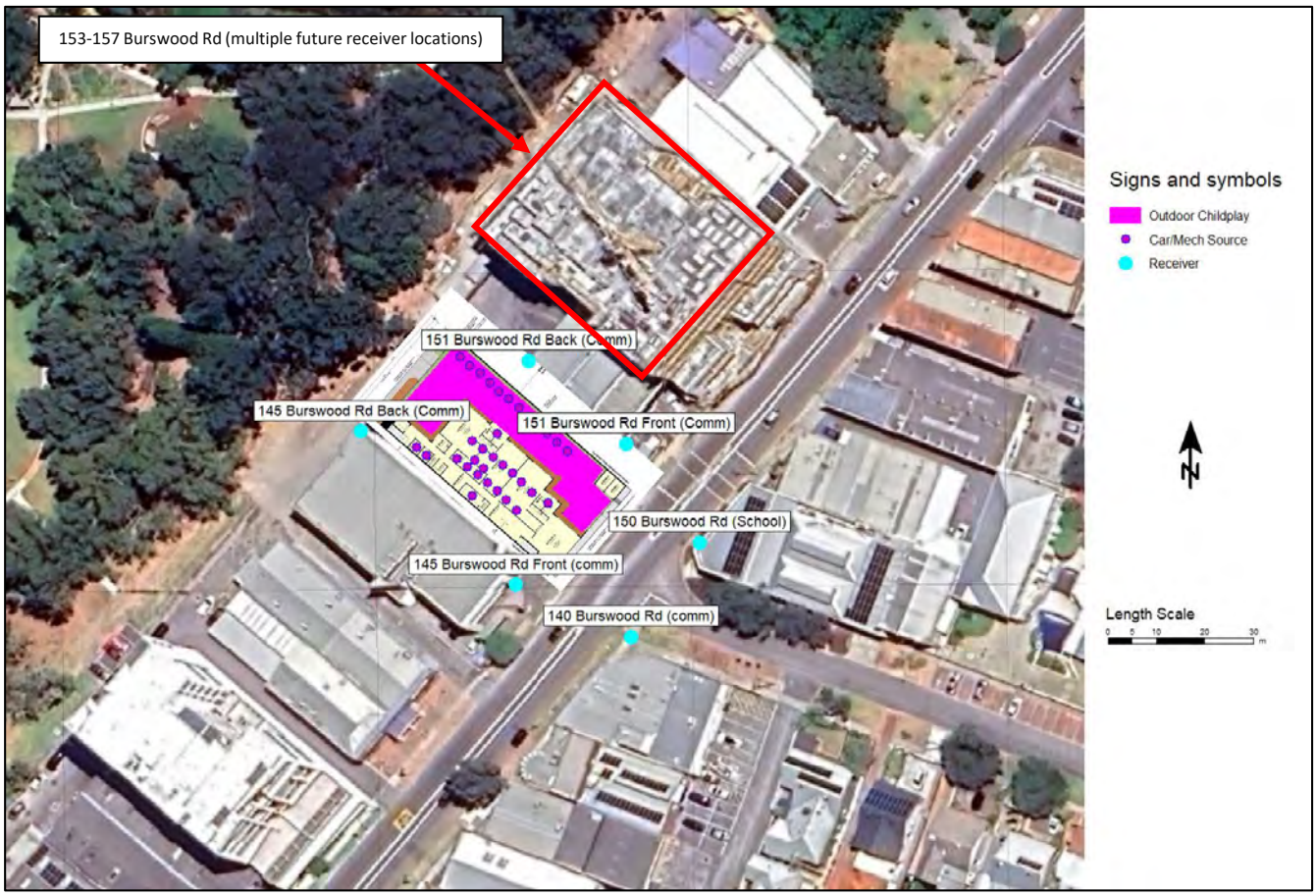


Figure 3-1: Overview of Noise Model

3.1.3. Ground Absorption

The ground absorption has been assumed to be 0.1 (10%) for the roads, 0.5 (50%) outside of the roads and 1.0 (100%) for the play areas, noting that 0.0 represents hard reflective surfaces such as water and 1.0 represents absorptive surfaces such as grass.

3.1.4. Source Sound Levels

The source sound power levels used in the modelling are provided in *Table 3-2*.

Table 3-2: Source Sound Power Levels, dB

Description	Octave Band Centre Frequency (Hz)								Overall dB(A)
	63	125	250	500	1k	2k	4k	8k	
Babies Play Aged 0-2 Years (10 kids), L_{10}	54	60	66	72	74	71	67	64	**78**
Toddler Play Aged 2-3 Years (10 kids), L_{10}	61	67	73	79	81	78	74	70	**85**
Kindy Play Aged 3+ Years (10 kids), L_{10}	64	70	75	81	83	80	76	72	**87**
AC Plant, double fan unit (each), L_{10}	72	74	68	69	63	61	53	47	**70**
General Exhaust Fans (each), L_{10}	60	65	62	63	60	61	56	53	**67**
Kitchen Exhaust Fan, L_{10}	50	64	61	70	69	66	62	50	**73**
Closing Car Door (each), L_{max}	71	74	77	81	80	78	72	61	**84**

The following is noted in relation to *Table 3-2*:

- Child play source levels are based on *Guideline for Childcare Centre Acoustic Assessments Version 3.0* produced by the Association of Australasian Acoustical Consultants (AAAC) published September 2020. Where the number of children for individual play areas is specified in the plans, these have been adjusted from the reference source levels using appropriate acoustical calculations. Outdoor child play was modelled as area sources at 1.0-metre above ground level. The sound power levels used in the model were scaled as follows:
  - 40 children aged 0-2 years = 84 dB(A);
  - 20 children aged 2-3 years = 88 dB(A);
  - 25 children aged 3+ years = 91 dB(A).
- Based on the AAAC Guideline 3.0, source sound power levels for AC condensing units were assumed. Medium sized (double fan) outdoor units were deemed appropriate with two (2) modelled as point sources 1.0-metre above the roof.
- Other mechanical plant includes four (4) exhaust fans (toilets and laundry) and one kitchen exhaust fan. All were modelled as point sources approximately 0.5-metres above roof level and above the area serviced.
- Car doors closing were modelled as a point source 1.0-metre above ground level. Since noise from a car door closing is a short term event, only the L_{Amax} level is applicable.

3.2. Transportation Noise

A combination of noise measurements and modelling have been undertaken in accordance with the requirements of SPP 5.4 and associated Guidelines, as described in *Section 3.2.1* and *Section 3.2.2*.

3.2.1. Transportation Site Measurements

Noise monitoring was undertaken on site using a Brüel & Kjær 2250 (S/N: 3024760) sound level meter (refer *Figure 3-2*). This meter complies with the instrumentation requirements of *Australian Standard 2702-1984 Acoustics – Methods for the Measurement of Road Traffic Noise*. The meter was field calibrated before and the after the measurement session and found to be accurate to within ± 1 dB. Lloyd George Acoustics holds current laboratory calibration certificates for the meter.

The microphone was approximately 1.4-metres above existing ground level and approximately 98-metres from the edge of Great Eastern Highway main carriageway and 67-metres from the edge of the CCC lot (refer *Figure 3-3*). This location was chosen to ensure the dominant noise source was from the Great Eastern Highway main carriageway. The measurements were recorded on 15 March 2024, between 12.00pm to 1.00pm.



Figure 3-2: Photograph of Sound Level Meter on Site



Figure 3-3: Measurement Location

From the one-hour measurement, a relationship between noise levels and the hourly traffic volumes can then be derived to determine the existing $L_{Aeq(Day)}$ and $L_{Aeq(Night)}$ at the measurement location.

3.2.2. Transportation Noise Modelling

The computer program *SoundPLAN 8.2* was utilised incorporating the *Calculation of Road Traffic Noise* (CoRTN) algorithms, modified to reflect Australian conditions. The modifications included the following:

- Vehicles were separated into heavy (Austroads Class 3 upwards) and non-heavy (Austroads Class 1 and 2) with non-heavy vehicles having a source height of 0.5-metres above road level and heavy vehicles having two source heights at 1.5-metres and 3.6-metres above road level;
- A -0.8 dB correction has been applied to the lower level heavy vehicle noise source and -8.0 dB to the higher level noise source based on the *Transportation Noise Reference Book*; Paul Nelson (1987), so as to provide consistent results with the CoRTN algorithms.

Predictions are made at heights of 1.4-metres above floor level and at 1.0-metre from various rooms of the proposed building, resulting in a + 2.5 dB correction due to reflected noise. For the outdoor play areas, this correction is not applicable and the height above ground level is 1.0-metres, to reflect the height of the children.

Various input data are included in the modelling and these are discussed in *Section 3.2.2.1* to *Section 3.2.2.3*, noting that some inputs are common to both environmental noise and road traffic noise (topography and ground absorption).

3.2.2.1. Road Surface

The corrections applied for different road surface finishes are provided in *Table 3-3*.

Table 3-3: Noise Relationship Between Different Road Surfaces

Chip Seal				Asphalt			
14mm	10mm	5mm	Slurry	Dense Graded	Novachip	Stone Mastic	Open Graded
+3.5 dB	+2.5 dB	+1.5 dB	+1.0 dB	0.0 dB	-0.2 dB	-1.5 dB	-2.5 dB

The existing road surface is dense graded asphalt and assumed to remain unchanged into the future.

3.2.2.2. Vehicle Speed

The existing posted speed is 60 km/hr and assumed to remain unchanged into the future.

3.2.2.3. Traffic Volumes

Existing traffic volumes for Great Eastern Highway were obtained from Main Roads WA Traffic Map. A modelled Validation Plot and Forecast 2041 traffic volumes were obtained from Main Roads WA (Thomas Ng, Traffic Modelling Analyst, Reference: #42815). This 2041 traffic volume was then forecast to 2043 using an estimated 3% increase in traffic per year. The validation plot allows the forecast volumes to be calibrated with *Table 3-4* providing the traffic volumes used in the noise modelling. Note that the percentage heavy vehicles are assumed to be the same in the future as existing.

Table 3-4: Traffic Information Used in Noise Modelling

Parameter	Scenario			
	Existing – 2020/21		Future – 2044	
	Northbound	Southbound	Northbound	Southbound
24-hour Volume	11,221	18,649	35,841	38,245
% Heavy	5	7	5	7

4. RESULTS AND ASSESSMENT

4.1. Environmental Noise

4.1.1. Outdoor Child Play Noise

The childcare development will host up to 85 children. It is noted play time is generally staggered and therefore not all children would be playing outside at once for extended periods of time. However, noise levels were conservatively predicted for all children playing simultaneously, as a worst-case scenario with the results provided and assessed in *Table 4-1*. The critical assigned level is during the day, as whilst the childcare centre will open at 6.30am, child play will not commence until after 7.00am. Noise from child play is not considered to contain annoying characteristics within the definition of the Regulations and therefore no adjustments are made to the predicted noise levels. A noise contour plot is also provided in *Figure 4-1* showing noise levels at ground floor.

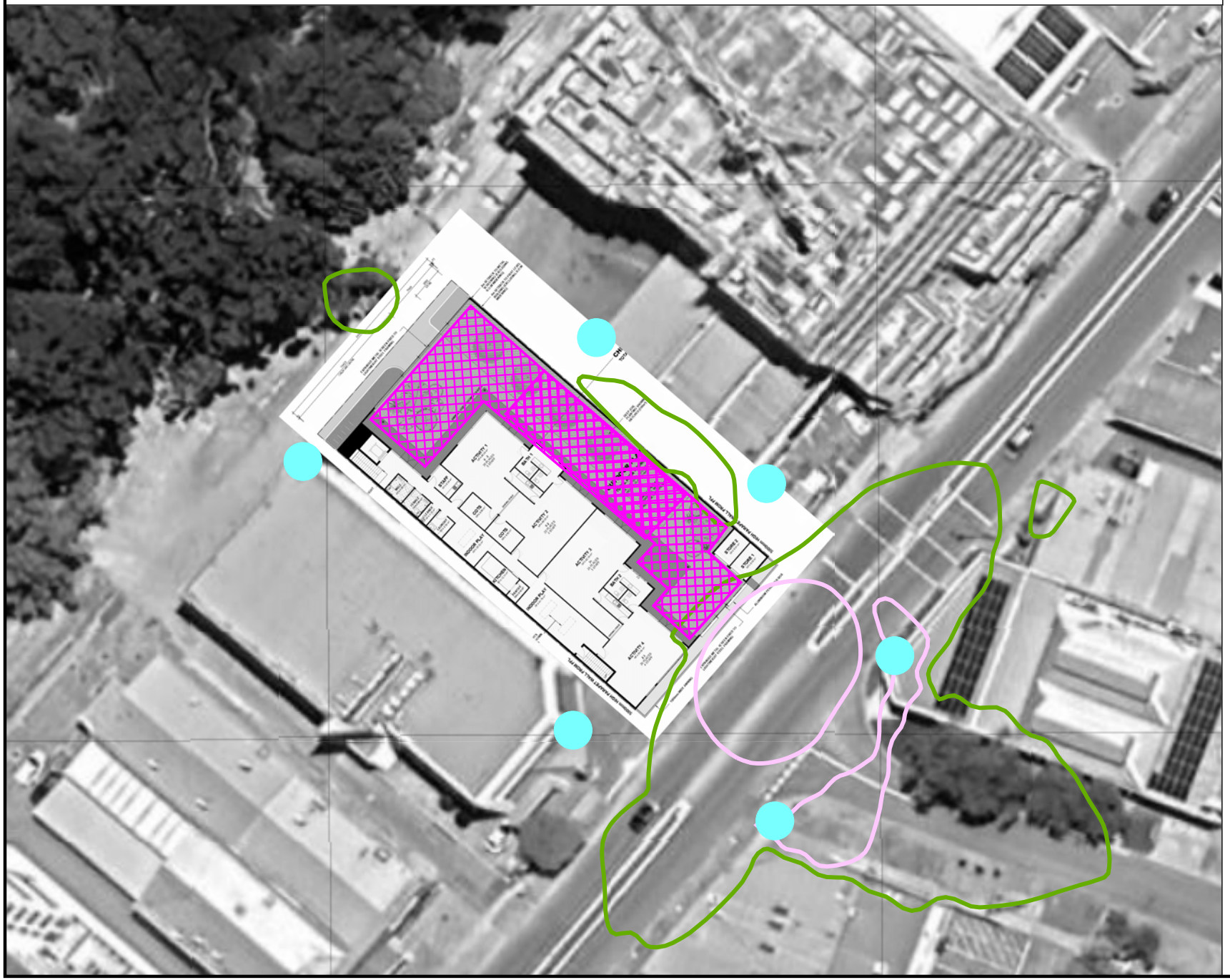
Table 4-1: Child Play Noise Predicted Levels and Assessment, dB L_{A10}

Receiver	Babies (0-2 yo)	Toddler (2-3 yo)	Kindy (3+ yo)	Total	Assigned Level	Assessment
150 Burswood Rd (school)	33	47	50	52	**56**	*Complies*
153-157 Burswood Rd* (future residence)	43	47	50	52	**56**	*Complies*
140 Burswood Rd (comm)	35	47	50	52	**60**	*Complies*
145 Burswood Rd (comm)*	40	29	32	41	**60**	*Complies*
151 Burswood Rd (comm)	34	35	38	41	**60**	*Complies*

*The highest noise level from predictions at multiple receivers were used in the assessment

Based on a conservative scenario of all 85 children playing outside simultaneously, the assessment demonstrates compliance is achieved during the day.

Figure 4-1 Child Play Noise Contour Plot (1.4m AGL), dB L_{A10}



Predicted Noise level

- = 46
- = 51
- = 56
- = 61
- = 66

Legend

- Receiver
- Outdoor Childplay
- Car/Mech Source

N

Scale 1:600

0 4 8 16 24 m

Project No:
Consultant:
Date: 19/03/2024
Algorithm: ISO 9613
SoundPLAN Version: 9.0

Lloyd George Acoustics
PO Box 717
HILLARYS WA 6923
(08) 9401 7770

4.1.2. Mechanical Plant Noise

Mechanical plant noise consists of the outdoor AC condensing units and exhaust fans. Predicted and assessed noise levels are provided in *Table 4-2*. The critical assigned level is during the night, as the plant may operate prior to 7.00am. An adjustment of + 5 dB is included for tonality, since this may be present for such noise sources. A noise contour plot is also provided in *Figure 4-2* showing noise levels at ground floor.

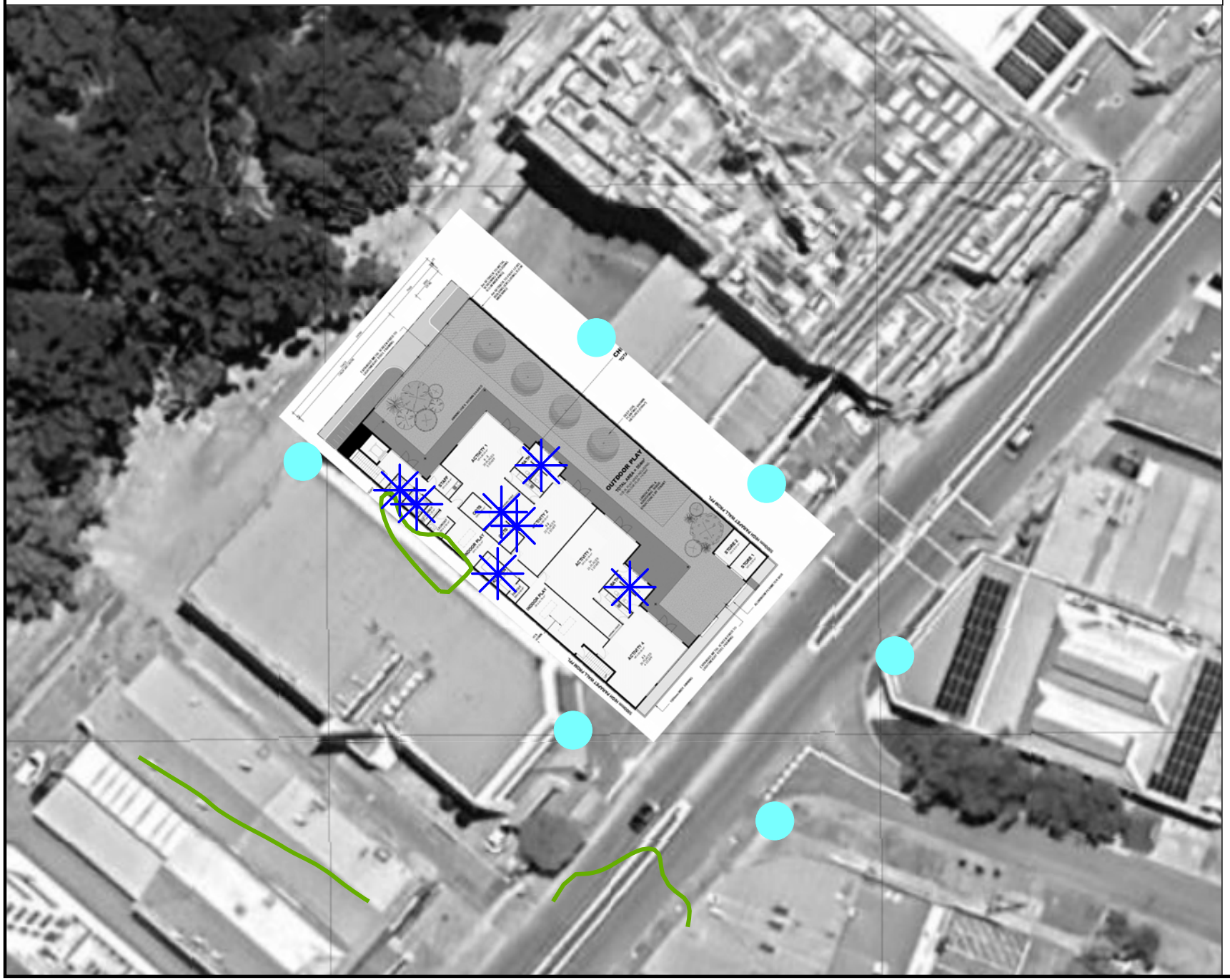
Table 4-2: Mechanical Plant Noise Predicted Levels and Assessment, dB L_{A10}

Receiver	AC	Exhaust Fans	Total	Total Adjusted	Assigned Level	Assessment
150 Burswood Rd (school)	24	26	28	**33**	**46**	*Complies*
153-157 Burswood Rd* (future residence)	34	36	38	**43**	**46**	*Complies*
140 Burswood Rd (comm)	22	26	27	**32**	**60**	*Complies*
145 Burswood Rd (comm)*	19	23	24	**29**	**60**	*Complies*
151 Burswood Rd (comm)	19	21	23	**28**	**60**	*Complies*

*The highest noise level from predictions at multiple receivers were used in the assessment

The calculations show compliance at all receiver locations. It must be noted that the assessment is based on assumptions in relation to the number, location, size and type of mechanical plant. Therefore, once the mechanical plant has been designed and selected, noise is to be reviewed by a suitably qualified acoustical consultant.

Figure 4-2 Mechanical Plant Noise Contour Plot (1.4m AGL), dB L_{A10}



Predicted Noise level

	= 31
	= 36
	= 41
	= 46
	= 51

Legend

- Receiver
- Car/Mech Source

N

Scale 1:600

0 4 8 16 24 m

Project No:
Consultant:
Date: 19/03/2024
Algorithm: ISO 9613
SoundPLAN Version: 9.0

Lloyd George Acoustics
PO Box 717
HILLARYS WA 6923
(08) 9401 7770

4.1.3. Car Door Closing Noise

Predicted and assessed noise levels for car doors closing are provided in *Table 4-3* being the maximum noise level from the worst-case car bay for each receiver. The critical assigned level is during the night, as car door closings will occur prior to 7.00am. An adjustment of + 10 dB is included for impulsiveness, since this may be present for such noise sources. A noise contour plot is also provided in *Figure 4-3* showing noise levels at ground floor.

Table 4-3: Car Door Closing Noise Predicted Levels and Assessment, dB L_{Amax}

Receiver	Car Door	Total Adjusted	Assigned Level	Assessment
150 Burswood Rd (school)	23	33	**66**	*Complies*
153-157 Burswood Rd* (future residence)	26	36	**66**	*Complies*
140 Burswood Rd (comm)	20	30	**80**	*Complies*
145 Burswood Rd (comm)*	42	52	**80**	*Complies*
151 Burswood Rd (comm)	33	43	**80**	*Complies*

*The highest noise level from predictions at multiple receivers were used in the assessment

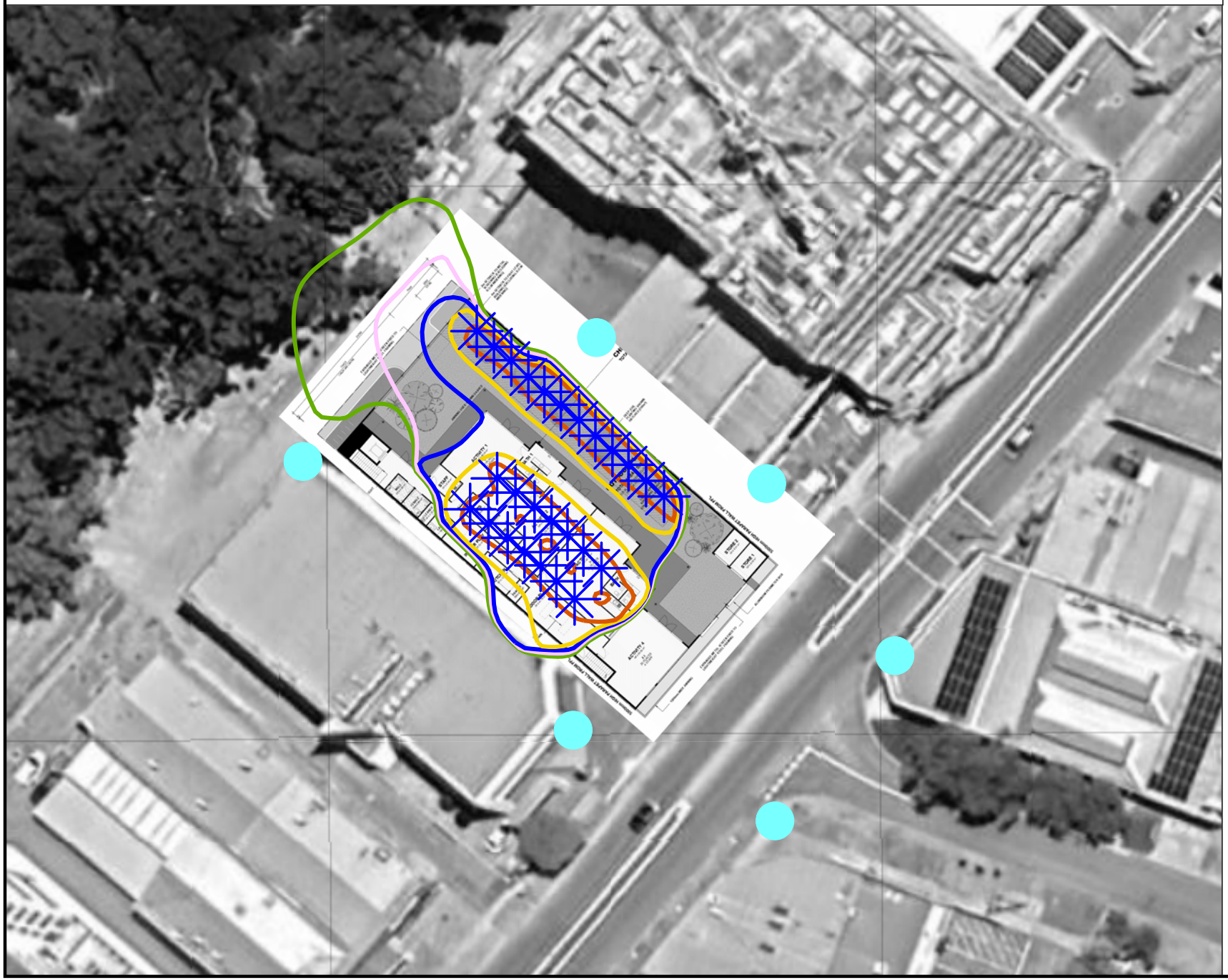
Noise from car doors is predicted to comply at all nearest receivers during the critical night period.

4.1.4. Indoor Child Play

An assessment of noise levels from indoor child play was carried out and the resulting noise levels at all locations were predicted to be well below that of outdoor child play considered in *Section 4.1.1*. This assessment was carried out based on the following considerations:

- Internal noise levels within activity rooms would not exceed those from outdoor play for each age group, regardless of windows being open or closed; and
- Any music played within the internal activity areas would be 'light' music with no significant bass content and played at a relatively low level.

Figure 4-3 Car Door Noise Contour Plot (1.4m AGL), dB L_{Amax}



Predicted Noise level

	= 51
	= 56
	= 61
	= 66
	= 71

Legend

- Receiver
- Car/Mech Source

N

Scale 1:600

0 4 8 16 24 m

Project No:
Consultant:
Date: 19/03/2024
Algorithm: ISO 9613
SoundPLAN Version: 9.0

Lloyd George Acoustics
PO Box 717
HILLARYS WA 6923
(08) 9401 7770

4.2. Transportation Noise

The results of the hourly noise level measurements, in free-field conditions, were:

- 15 March 2024: 12.00pm to 1.00pm – 53.8 dB $L_{Aeq,1hour}$.

Combining the measured noise level with the corresponding hourly traffic volume, as shown in *Figure 4-4*, results in 53.9 $L_{Aeq(Day)}$.

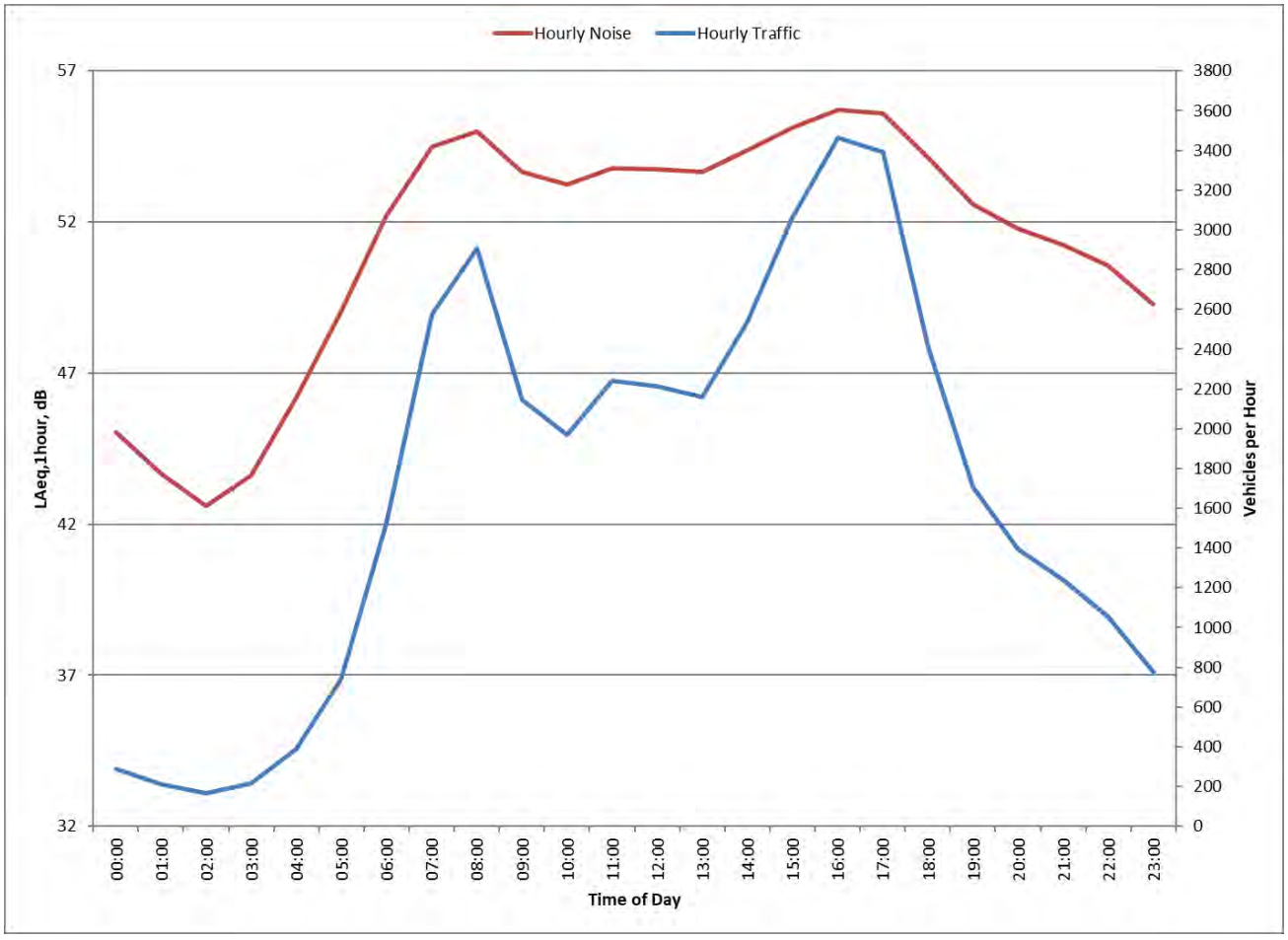


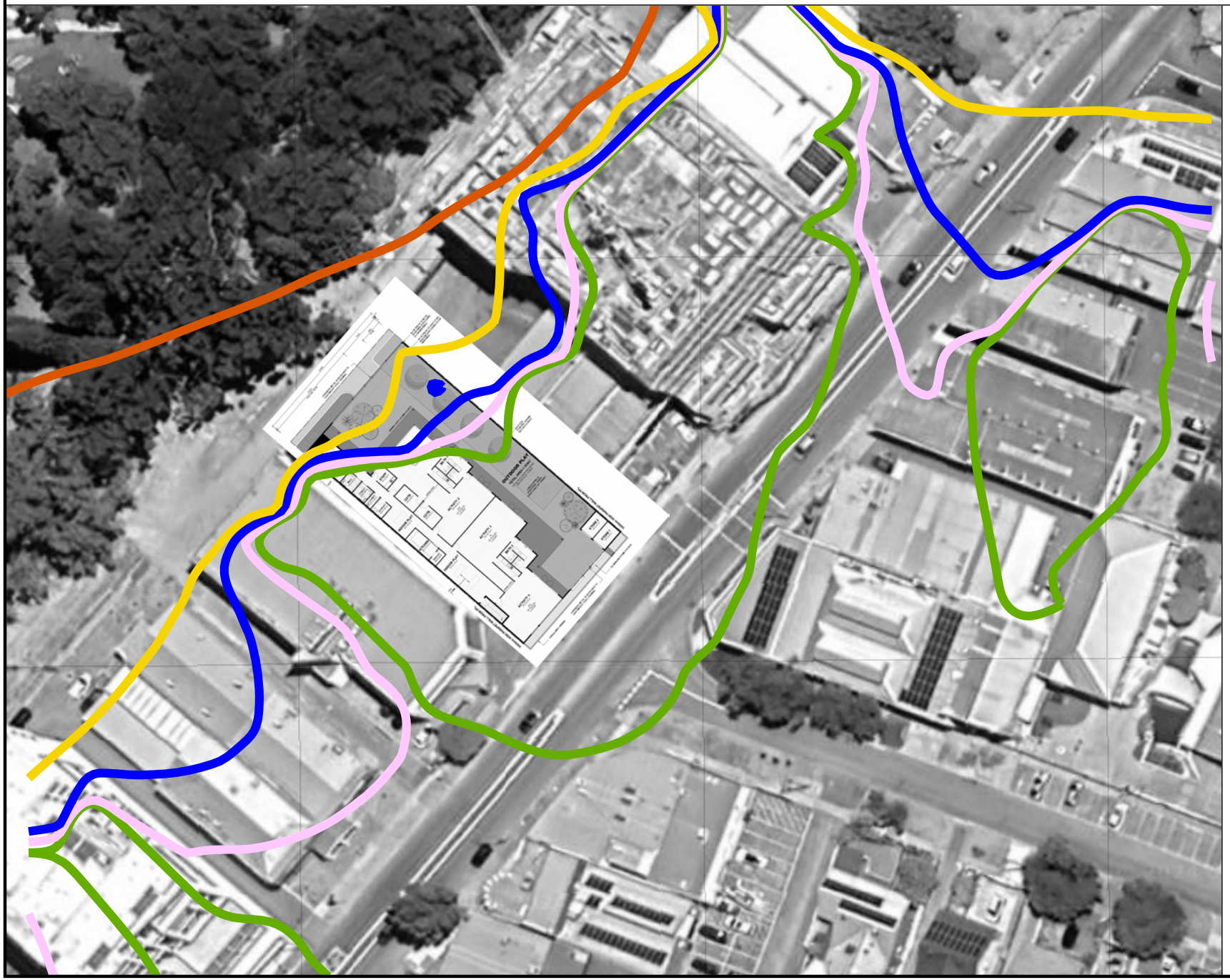
Figure 4-4: Noise Level Relationship to Hourly Traffic Volumes

The noise model is initially calibrated for existing daytime conditions and then modified for future conditions, including increased traffic and the inclusion of the proposed development. The results of this modelling are presented in *Figure 4-5* and *Figure 4-6* as noise contour plots. These are effectively the same plot with *Figure 4-5* including the facade reflection, appropriate for building upgrade design, and *Figure 4-6* without the facade correction, appropriate for assessment to the outdoor play areas.

From *Figure 4-5*, it can be seen that noise levels at the CCC building will be within Exposure A. As such, some facade upgrades will be required to achieve compliant internal noise levels, to be further reviewed at detailed design.

From *Figure 4-6*, it can be seen that the majority of the outdoor play area, where the facade reflection is not applicable, is below the outdoor noise target and therefore considered compliant with SPP 5.4.

Figure 4-5 Future Road Traffic Noise Contours with Façade Correction (Upper Floor)



Predicted Noise level

- = 51
- = 53
- = 55
- = 57
- = 59

N

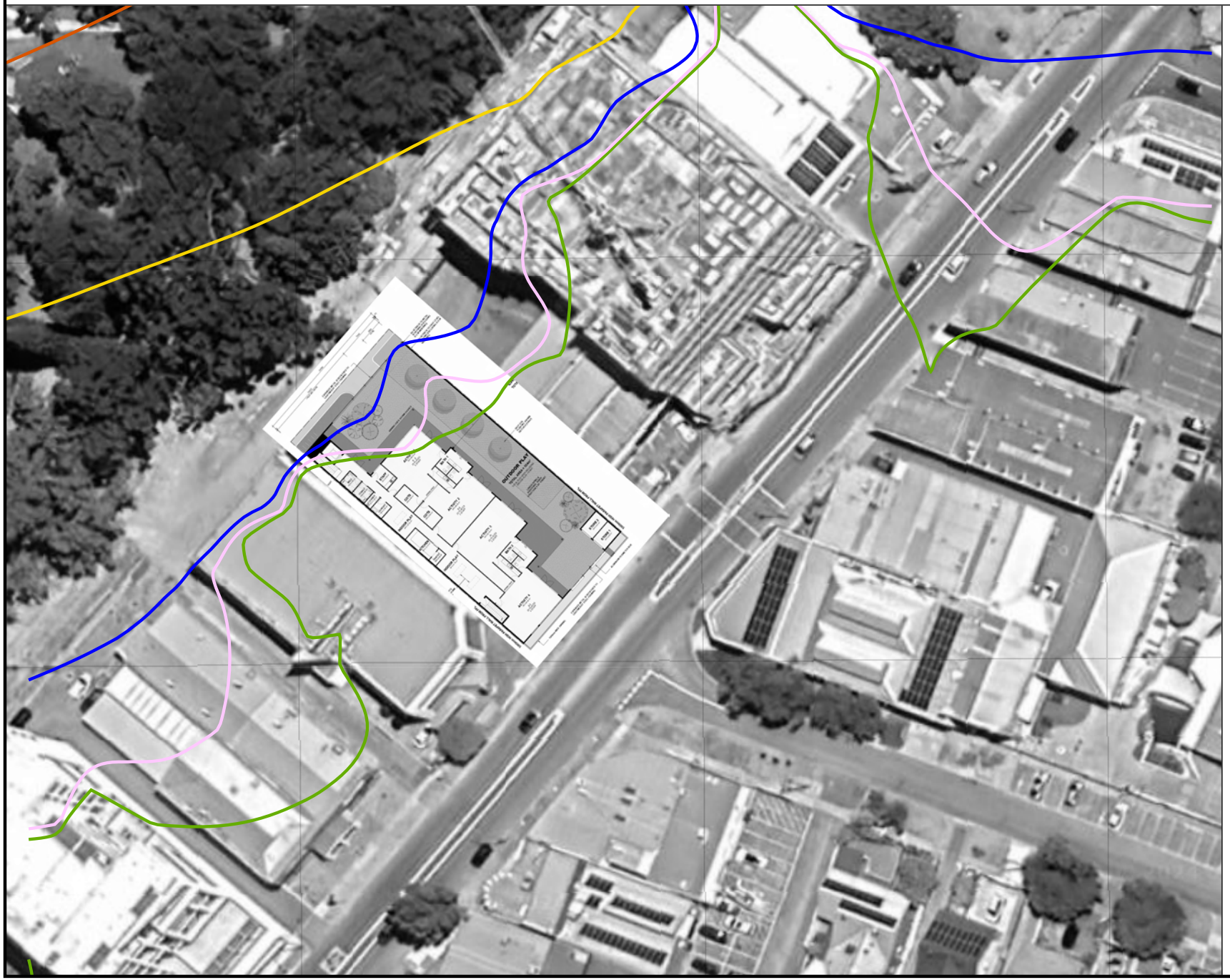
Scale 1:500

0 5 10 20 30 m

Project No:
Consultant:
Date: 19/03/2024
Algorithm: ISO 9613
SoundPLAN Version: 9.0

Lloyd George Acoustics
PO Box 717
HILLARYS WA 6923
(08) 9401 7770

Figure 4-6 Future Road Traffic Noise Contours No Facade Correction (Upper Floor)



Predicted Noise level

- = 51
- = 53
- = 55
- = 57
- = 59

N

Scale 1:500

0 5 10 20 30 m

Project No:
Consultant:
Date: 19/03/2024
Algorithm: ISO 9613
SoundPLAN Version: 9.0

Lloyd George Acoustics
PO Box 717
HILLARYS WA 6923
(08) 9401 7770

5. RECOMMENDATIONS

5.1. Environmental Noise

5.1.1. Child Play

The predicted noise from all children playing outside is predicted to be compliant.

Whilst not necessarily required for compliance, to further minimise noise impacts as part of best practice, the following are provided:

- The behaviour and 'style of play' of children should be monitored to prevent particularly loud activity e.g. loud banging/crashing of objects, 'group' shouts/yelling;
- Favour soft finishes in the outdoor play area to minimise impact noise (e.g. soft grass, sand pit(s), rubber mats) over timber or plastic;
- Favour soft balls and rubber wheeled toys;
- Crying children should be taken inside to be comforted;
- Child play to be staggered;
- No amplified music to be played outside;
- Any music played within the internal activity areas to be 'light' music with no significant bass content and played at a relatively low level;
- Car park drainage grates or similar to be plastic or metal with rubber gasket and secured to avoid excess banging.

5.1.2. Mechanical Plant

For mechanical plant, the following are recommended:

- Once the mechanical plant has been designed and selected, the noise levels shall be reviewed prior to Building Permit;
- All exhaust fans shall be located inside the ceiling void and shall be axial fan type, allowing the incorporation of an attenuator if required;
- All fans shall be variable speed drive so that maximum speed is only occurring when necessary with demand;
- Air-conditioning shall have a ‘night’ / ‘quiet’ mode option, in case required for prior to 7.00am operation, subject to final detailed analysis;
- All plant shall be selected taking into consideration noise levels. That is, when comparing manufacturers of equivalent equipment, select the quieter model;
- All plant is to be appropriately vibration isolated to 95% isolation efficiency.

5.1.3. Car Doors

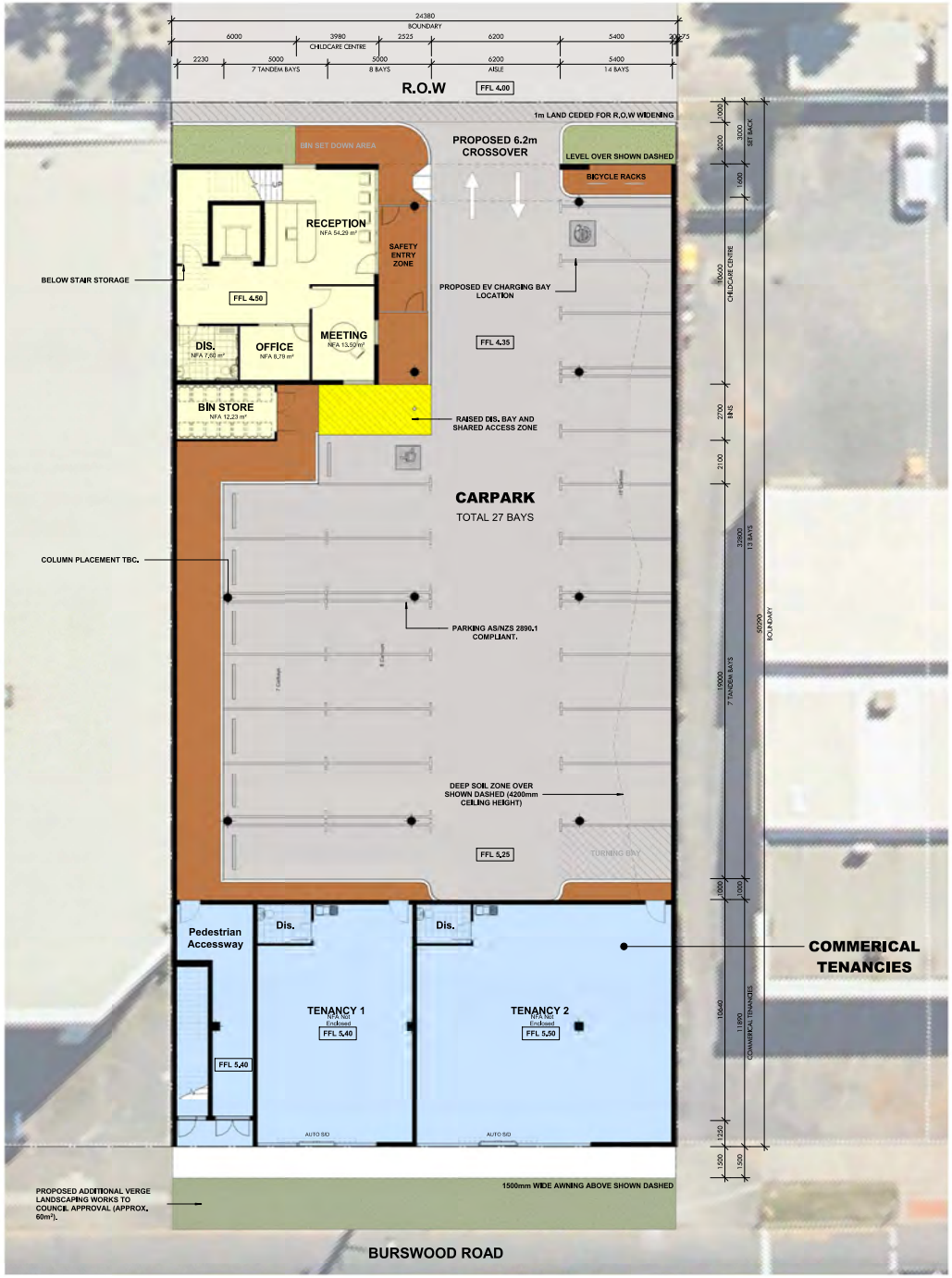
The predicted noise from car door closings is predicted to be compliant.

5.2. Transportation Noise

Predicted noise levels from road traffic, at the facade of the CCC Building, are above the outdoor noise target of *State Planning Policy No. 5.4 Road and Rail Noise*. During detailed design and prior to Building Permit, glazing construction shall be reviewed for sensitive areas within the CCC, in order to achieve acceptable internal noise levels.

Noise levels to the outdoor play areas are generally considered compliant with the majority below the outdoor noise target.

Appendix A – Development Plans



SITE PLAN & GROUND FLOOR PLAN

SCALE: 1 : 100



FIRST FLOOR PLAN

SCALE: 1 : 100

SITE CRITERIA

1. Site Area

	Total		1226m²

2. Floor Area (GFA)

a. Tenancy 1			85m²
b. Tenancy 2			141m²
d. Child Care			
i. Ground Floor			116m²
ii. First Floor			535m²
ii. Store			20m²
	Total		897m²

3. Carparking

i. Cars Required			
a. Tenancy 1 & 2	225m²	@ 1/40	6 Cars
b. Tenancy 3	85 kids	@ 1/5 kids	17 Cars
c. Existing Lease			5 Cars
Total Cars Required			28 Cars
ii. Cars Provided			
a. On Grade			28 Cars
Total Cars Provided			28 Cars

4. Landscaping

i. Ground Floor		21m²
ii. First Floor (incl. 126m2/10.3% Deep Soil)		425m2
Total		447m² (36.5%)

Landscaping
A. Hard Landscaping
Defined as paved walkways either open or covered.
B. Soft Landscaping
Defined as vegetative landscaping.

Gross Floor Area - GFA
A. All floor Areas on this plan are shown as GROSS FLOOR AREA.
B. Definition of Gross Floor Area as Net Floor Area
i. GROSS FLOOR AREA OF TENANCY:
Gross Floor Area of an individual Tenancy is defined as the area contained between the centre line of common tenancy walls and the outside edge of external walls.
ii. GROSS FLOOR AREA OF A BUILDING:
Gross Floor Area of a Building is defined as the total area contained between the outside edge of external walls

Nett Floor Area - NFA
A. Nett Floor Area of a Tenancy on this plan is defined as the area between external or tenancy dividing walls.
B. This area is inclusive of toilets if the toilets are exclusive to the Tenancy.

PRELIMINARY

meyer shircore architects

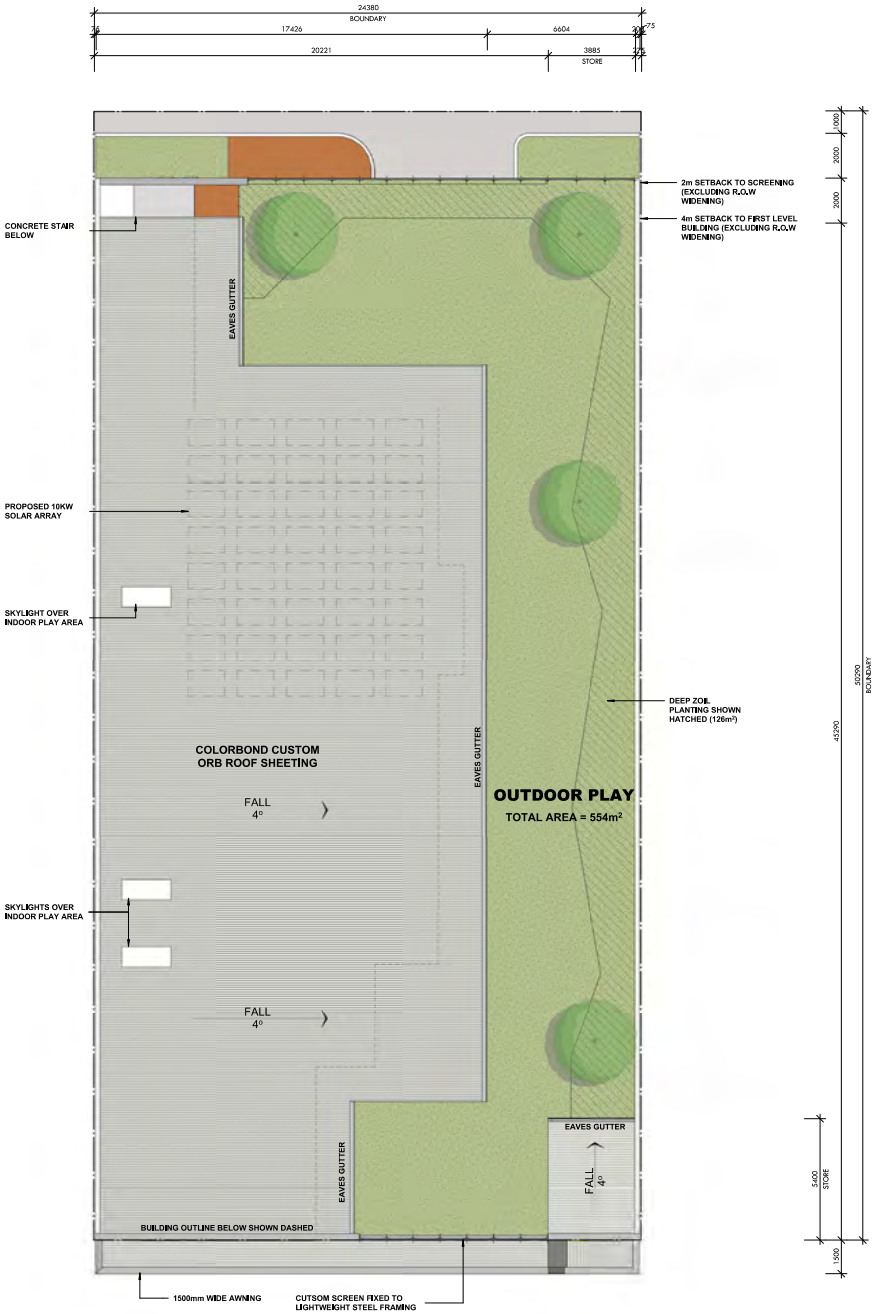
PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD
FOR : ELVEN PROPERTY

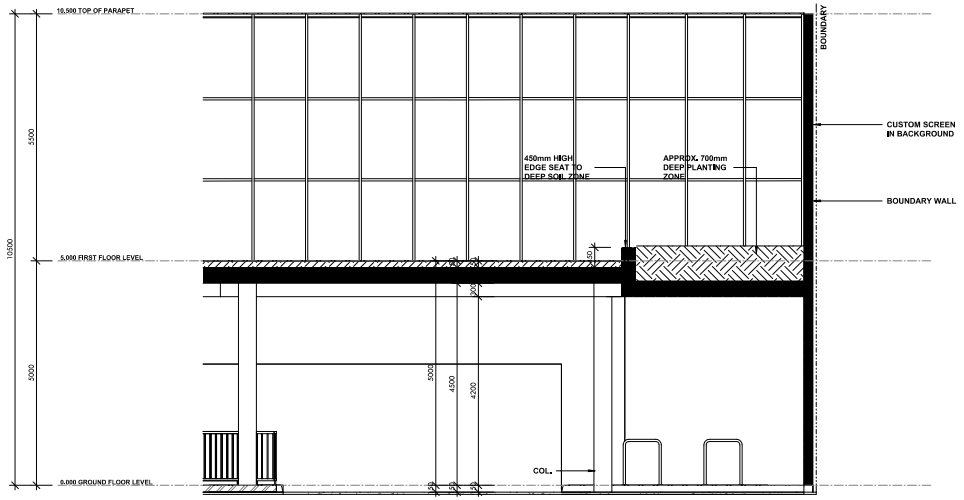
0 1 2 3 4 5 10

DATE: MAR 2024 PROJECT NUMBER
REVISION: SK012 **22-8926**
SHEET: A - 1000
SCALE: 1 : 100 @B1

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 407 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: mail@meyershircore.com.au



ROOF PLAN
SCALE: 1 : 100



DEEP SOIL ZONE SECTION
SCALE: 1 : 50

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE
LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD
FOR : ELVEN PROPERTY

DATE: MAR 2024
REVISION: SK012
SHEET: A - 2000
SCALE: As indicated@B1

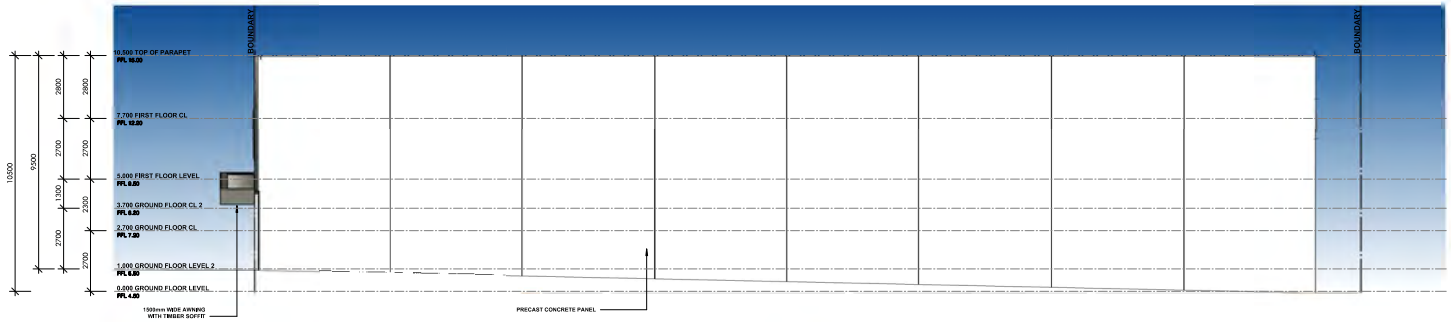
PROJECT NUMBER
22-8926

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground Floor 407 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 0419 901 811 e: mail@meyershircore.com.au



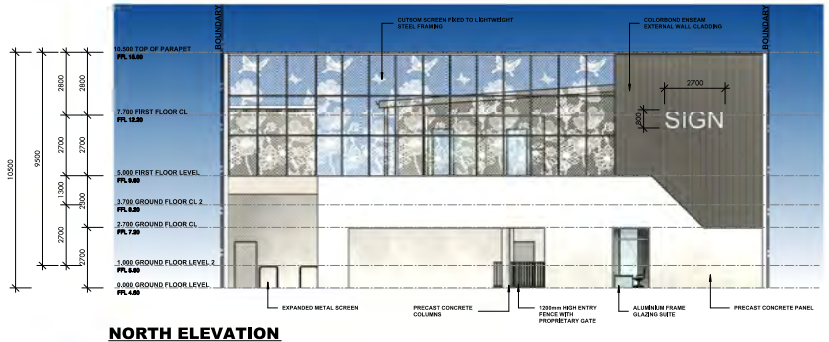
SOUTH ELEVATION (BURSWOOD ROAD)

SCALE: 1 : 100



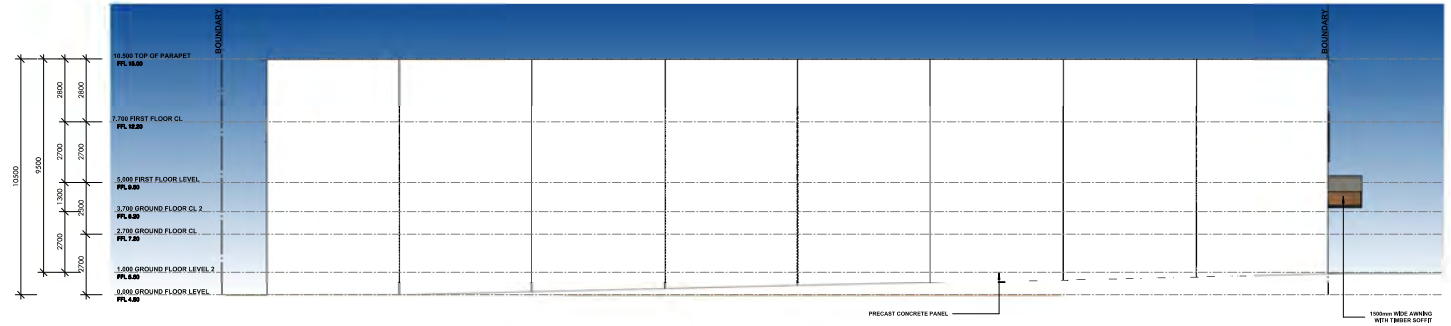
EAST ELEVATION

SCALE: 1 : 100



NORTH ELEVATION

SCALE: 1 : 100



WEST ELEVATION

SCALE: 1 : 100

PRELIMINARY

meyer shircore architects

PROPOSED CHILDCARE CENTRE

LOCATION : 147-147 BURSWOOD ROAD, BURSWOOD

FOR : ELVEN PROPERTY

DATE: MAR 2024 PROJECT NUMBER

REVISION: SK012 **22-8926**

SHEET: A - 3000

SCALE: 1 : 100 @B1

0 1 2 3 4 5 10

© Meyer Shircore & Associates ACN 115 189 216
Suite 2, Ground floor 407 Roberts Road, Subiaco WA 6008
PO Box 1294 Subiaco WA 6904
t: 08 9381 8511 e: mail@meyershircore.com.au

Appendix B – Influencing Factor Calculation

The assigned levels combine a baseline assigned level with an influencing factor, with the latter increasing the assigned level on the basis of the existence of significant roads and commercial or industrial zoned land within an inner circle (100 metre radius) and an outer circle (450 metre radius) of the noise sensitive premises. The calculation for the influencing factor is:

$$= \frac{1}{10}(\%\ \text{Type A}_{100} + \%\ \text{Type A}_{450}) + \frac{1}{20}(\%\ \text{Type B}_{100} + \%\ \text{Type B}_{450})$$

where:

$\%\ \text{Type A}_{100}$ = the percentage of industrial land within a 100m radius of the premises receiving the noise

$\%\ \text{Type A}_{450}$ = the percentage of industrial land within a 450m radius of the premises receiving the noise

$\%\ \text{Type B}_{100}$ = the percentage of commercial land within a 100m radius of the premises receiving the noise

$\%\ \text{Type B}_{450}$ = the percentage of commercial land within a 450m radius of the premises receiving the noise

+ Transport Factor (maximum of 6 dB)

= 2 for each secondary road (6,000 to 15,000 vpd) within 100m

= 2 for a major road (>15,000 vpd) within 450m

= 6 for a major road within 100m

The nearest noise sensitive premise used for the influencing calculations has been identified as 157 Burswood Road.

Table B-1 shows the percentage of industrial and commercial land within the inner (100 metre radius) and outer (450 metre radius) circles of the noise sensitive premises.

Table B-1: Percentage of Land Types within 100m and 450m Radii

Receiver	Land Type	Within 100m	Within 450m
157 Burswood Road	Type A - Industrial and Utility	0	0
	Type B – Commercial	67	23

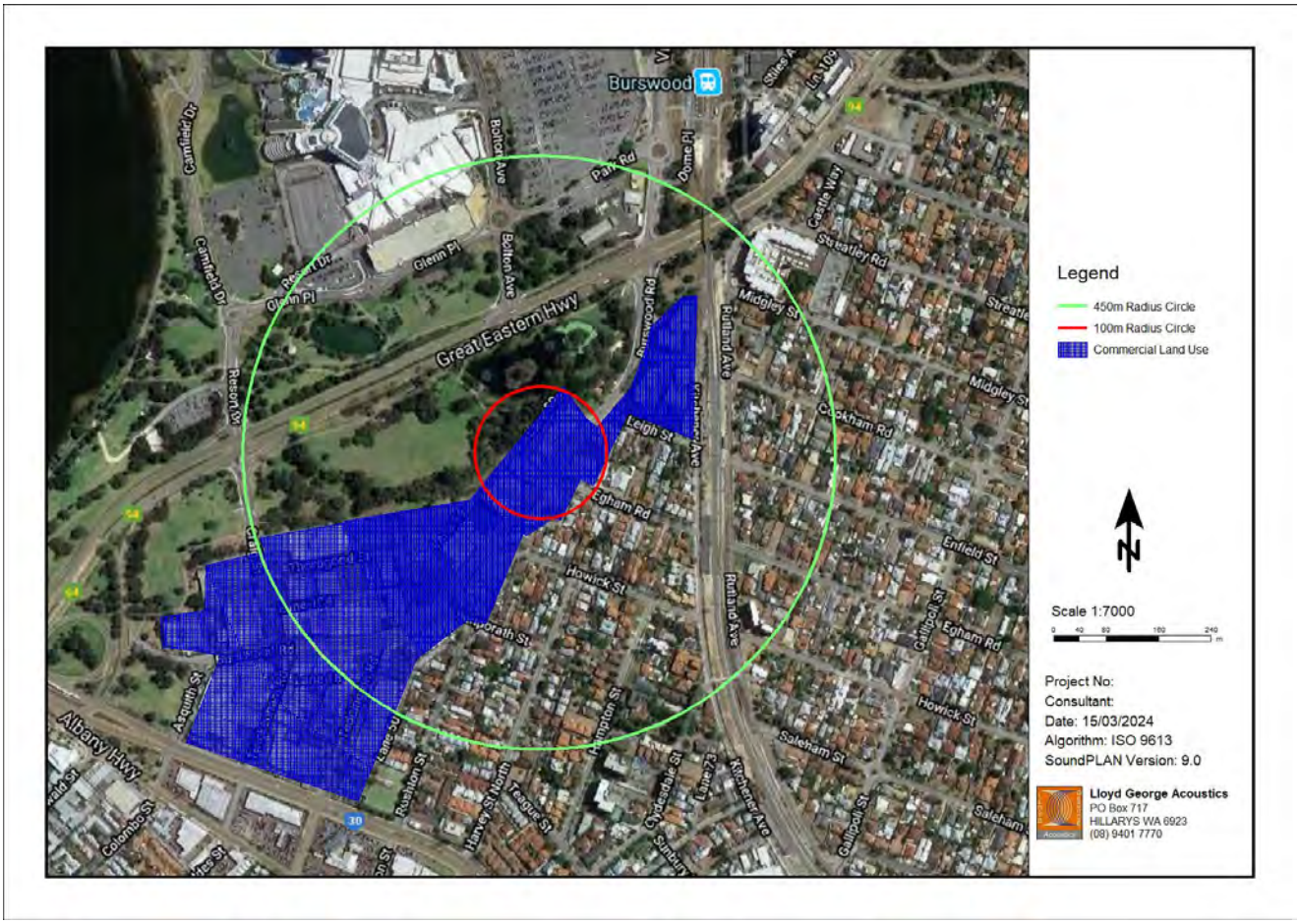


Figure B-1: Land Types within 100m and 450m Radii

From the Main Roads WA Traffic intersection count, *Table B-2* shows the relevant roads and their traffic counts within the inner (100 metre radius) and outer (450 metre radius) circles.

Table B-2: Relevant Roads within 100m and 450m Radii

Receiver	Within 100m		Within 450m
	Major Road (+ 6 dB)	Secondary Road (+ 2 dB)	Major Road Not Within 100m (+ 2 dB)
157 Burswood Road	Burswood Road (16,600 2023 LM01167)	-	-

Table B-3 combines the percentage land types and Transport Factor to calculate the influencing factor.

Table B-3: Influencing Factor Calculation, dB

Receiver	Industrial Land	Commercial Land	Transport Factor	Total
157 Burswood Road	0	4.5	6.0	**11**

The influencing factor calculated in *Table B-3* is combined with those baseline assigned levels of *Table 2-2*, resulting in the project assigned levels provided in *Table 2-3*.

Appendix C – Terminology

The following is an explanation of the terminology used throughout this report:

- **Decibel (dB)**

The decibel is the unit that describes the sound pressure levels of a noise source. It is a logarithmic scale referenced to the threshold of hearing.

- **A-Weighting**

An A-weighted noise level has been filtered in such a way as to represent the way in which the human ear perceives sound. This weighting reflects the fact that the human ear is not as sensitive to lower frequencies as it is to higher frequencies. An A-weighted sound level is described as L_A, dB.

- **Sound Power Level (L_w)**

Under normal conditions, a given sound source will radiate the same amount of energy, irrespective of its surroundings, being the sound power level. This is similar to a 1kW electric heater always radiating 1kW of heat. The sound power level of a noise source cannot be directly measured using a sound level meter but is calculated based on measured sound pressure level at known distances. Noise modelling incorporates source sound power levels as part of the input data.

- **Sound Pressure Level (L_p)**

The sound pressure level of a noise source is dependent upon its surroundings, being influenced by distance, ground absorption, topography, meteorological conditions etc. and is what the human ear actually hears. Using the electric heater analogy above, the heat will vary depending upon where the heater is located, just as the sound pressure level will vary depending on the surroundings. Noise modelling predicts the sound pressure level from the sound power levels taking into account ground absorption, barrier effects, distance etc.

- **L_{ASlow}**

This is the noise level in decibels, obtained using the A-frequency weighting and the S (slow) time weighting. Unless assessing modulation, all measurements use the slow time weighting characteristic.

- **L_{AFast}**

This is the noise level in decibels, obtained using the A-frequency weighting and the F (fast) time weighting. This is used when assessing the presence of modulation.

- **L_{APeak}**

This is the greatest absolute instantaneous sound pressure level in decibels using the A-frequency weighting.

- **L_{Amax}**

An L_{Amax} level is the maximum A-weighted noise level during a particular measurement.

- **L_{A1}**

The L_{A1} level is the A-weighted noise level exceeded for 1 percent of the measurement period and is considered to represent the average of the maximum noise levels measured.

- **L_{A10}**

The L_{A10} level is the A-weighted noise level exceeded for 10 percent of the measurement period and is considered to represent the "intrusive" noise level.

- **L_{A90}**

The L_{A90} level is the A-weighted noise level exceeded for 90 percent of the measurement period and is considered to represent the "background" noise level.

- **L_{Aeq}**

The equivalent steady state A-weighted sound level ("equal energy") in decibels which, in a specified time period, contains the same acoustic energy as the time-varying level during the same period. It is considered to represent the "average" noise level.

- **One-Third-Octave Band**

Means a band of frequencies spanning one-third of an octave and having a centre frequency between 25 Hz and 20000 Hz inclusive.

- **Representative Assessment Period**

Means a period of time not less than 15 minutes, and not exceeding four hours, determined by an inspector or authorised person to be appropriate for the assessment of a noise emission, having regard to the type and nature of the noise emission.

- **L_{Amax} assigned level**

Means an assigned level, which, measured as a L_{ASlow} value, is not to be exceeded at any time.

- **L_{A1} assigned level**

Means an assigned level, which, measured as a L_{ASlow} value, is not to be exceeded for more than 1 percent of the representative assessment period.

- **L_{A10} assigned level**

Means an assigned level, which, measured as a L_{ASlow} value, is not to be exceeded for more than 10 percent of the representative assessment period.

- **$L_{Aeq(Day)}$**

The $L_{Aeq(Day)}$ level is the logarithmic average of the L_{Aeq} levels from 6.00am to 10.00pm.

- **$L_{Aeq(Night)}$**

The $L_{Aeq(Night)}$ level is the logarithmic average of the L_{Aeq} levels from 10.00pm to 6.00am.

- **Tonal Noise**

A tonal noise source can be described as a source that has a distinctive noise emission in one or more frequencies. An example would be whining or droning. The quantitative definition of tonality is:

– the presence in the noise emission of tonal characteristics where the difference between -

(a) the A-weighted sound pressure level in any one-third octave band; and

(b) the arithmetic average of the A-weighted sound pressure levels in the 2 adjacent one-third octave bands,

is greater than 3 dB when the sound pressure levels are determined as $L_{Aeq,T}$ levels where the time period T is greater than 10% of the representative assessment period, or greater than 8 dB at any time when the sound pressure levels are determined as $L_{A\ Slow}$ levels.

This is relatively common in most noise sources.

- **Modulating Noise**

A modulating source is regular, cyclic and audible and is present for at least 10% of the measurement period. The quantitative definition of modulation is:

– a variation in the emission of noise that —

(a) is more than 3 dB $L_{A\ Fast}$ or is more than 3 dB $L_{A\ Fast}$ in any one-third octave band; and

(b) is present for at least 10% of the representative assessment period; and

(c) is regular, cyclic and audible.

- **Impulsive Noise**

An impulsive noise source has a short-term banging, clunking or explosive sound. The quantitative definition of impulsiveness means:

– a variation in the emission of a noise where the difference between L_{Apeak} and L_{Amax} is more than 15 dB when determined for a single representative event.

- **Major Road**

Is a road with an estimated average daily traffic count of more than 15,000 vehicles.

- **Secondary / Minor Road**

Is a road with an estimated average daily traffic count of between 6,000 and 15,000 vehicles.

- **Noise-sensitive land use and/or development**

Land-uses or development occupied or designed for occupation or use for residential purposes (including dwellings, residential buildings or short-stay accommodation), caravan park, camping ground, educational establishment, child care premises, hospital, nursing home, corrective institution or place of worship.

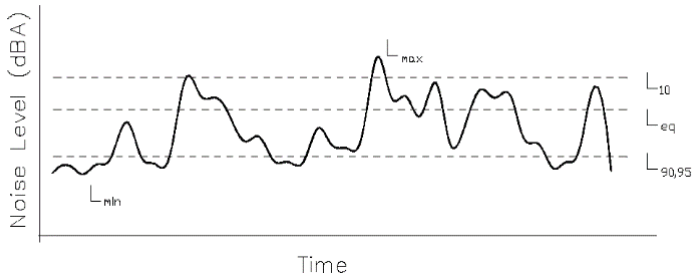
- **R_w**

This is the weighted sound reduction index. It is a single number rating determined by moving a grading curve in integral steps against the laboratory measured transmission loss until the sum of the deficiencies at each one-third-octave band, between 100 Hz and 3.15 kHz, does not exceed 32 dB. The higher the R_w value, the better the acoustic performance.

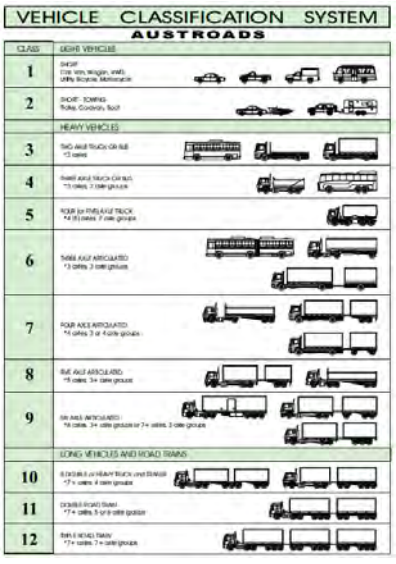
- **C_{tr}**

This is a spectrum adaptation term for airborne noise and provides a correction to the R_w value to suit source sounds with significant low frequency content such as road traffic or home theatre systems. A wall that provides a relatively high level of low frequency attenuation (i.e. masonry) may have a value in the order of – 4 dB, whilst a wall with relatively poor attenuation at low frequencies (i.e. stud wall) may have a value in the order of -12 dB.

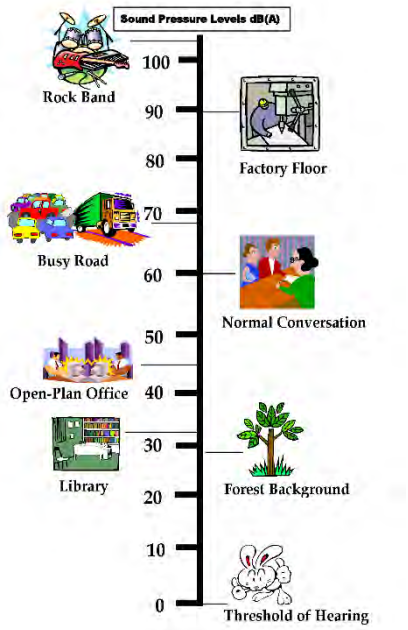
- **Chart of Noise Level Descriptors**



- **Austroads Vehicle Class**



- **Typical Noise Levels**



Waste Management Plan

147 Burswood Road, Burswood

Prepared for Ekta Holding Pty Ltd

18 July 2024

Project Number: WMP24018

DOCUMENT CONTROL					
Version	**Description**	**Date**	**Author**	**Reviewer**	**Approver**
1.0	First Approved Release	25/03/2024	MA	DP	DP
2.0	Second Approved Release	22/04/2024	MA	DP	DP
3.0	Third Approved Release	18/07/2024	MA	DP	DP

Approval for Release

Name	**Position**	**File Reference**
Dilan Patel	Project Manager – Waste Management Consultant	WMP24018-02_Waste Management Plan_3.0
Signature		

Copyright of this document or any part of this document remains with Talis Consultants Pty Ltd and cannot be used, transferred or reproduced in any manner or form without prior written consent from Talis Consultants Pty Ltd.

Executive Summary

Ekta Holding Pty Ltd is seeking development approval for the proposed commercial development located at 147 Burswood Road, Burswood (the Proposal).

To satisfy the conditions of the development application the Town of Victoria Park (the Town) requires the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Proposal. Talis Consultants has been engaged to prepare this WMP to satisfy the Town's requirements.

A summary of the bin size, numbers, collection frequency and collection method is provided in the below table.

Proposed Waste Collection Summary

Waste Type	Generation (L/week)	Bin Size (L)	Number of Bins	Collection Frequency	Collection
Refuse	3,071	240	Seven	Two times each week	Private Contractor
Recycling	3,071	240	Seven	Two times each week	Private Contractor

A private contractor will collect refuse and recyclables from the Proposal via the Bin Presentation Area on ROW/laneway.

Building management will oversee the relevant aspects of waste management at the Proposal.

Table of Contents

1 Introduction 1

1.1 Objectives and Scope 1

2 Waste Generation 2

2.1 Proposed Tenancies 2

2.2 Waste Generation Rates 2

2.3 Waste Generation Volumes 3

3 Waste Storage 4

3.1 Internal Transfer of Waste 4

3.2 Bin Sizes 4

3.3 Bin Storage Area Size 4

3.4 Bin Storage Area Design 5

4 Waste Collection 6

4.1 Bulk and Speciality Waste 6

5 Waste Management 7

6 Conclusion 8

Tables

Table 2-1: Waste Generation Rates 2

Table 2-2: Estimated Waste Generation 3

Table 3-1: Typical Bin Dimensions 4

Table 3-2: Bin Requirements for Bin Storage Area 4

Diagrams

Diagram 1: Bin Storage Area

Diagram 2: Bin Presentation Area

Figures

Figure 1: Locality Plan

1 Introduction

Ekta Holding Pty Ltd is seeking development approval for the proposed commercial development located at 147 Burswood Road, Burswood (the Proposal).

To satisfy the conditions of the development application the Town of Victoria Park (the Town) requires the submission of a Waste Management Plan (WMP) that will identify how waste is to be stored and collected from the Proposal. Talis Consultants has been engaged to prepare this WMP to satisfy the Town's requirements.

The Proposal is bordered by ROW/laneway to the north, commercial developments to the east and to the west and Burswood Road to the south, as shown in Figure 1.

1.1 Objectives and Scope

The objective of this WMP is to outline the equipment and procedures that will be adopted to manage waste (refuse and recyclables) at the Proposal. Specifically, the WMP demonstrates that the Proposal is designed to:

- Adequately cater for the anticipated volume of waste to be generated;
- Provide an adequately sized Bin Storage Area, including appropriate bins; and
- Allow for efficient collection of bins by appropriate waste collection vehicles.

To achieve the objective, the scope of the WMP comprises:

- Section 2: Waste Generation;
- Section 3: Waste Storage;
- Section 4: Waste Collection;
- Section 5: Waste Management; and
- Section 6: Conclusion.

2 Waste Generation

The following section shows the waste generation rates used and the estimated waste volumes to be generated at the Proposal.

2.1 Proposed Tenancies

The anticipated volume of refuse and recyclables is based on the floor area (m^2) of the commercial tenancies at the Proposal. The Proposal consists of the following:

- Tenancy 1 – 85m^2;
- Tenancy 2 – 141m^2; and
- Childcare Centre – 651m^2.

2.2 Waste Generation Rates

In order to achieve an accurate projection of waste volumes for the Proposal, consideration was given to the City of Melbourne's *Guidelines for Waste Management Plans* (2021).

Table 2-1 shows the waste generation rates which have been applied to the Proposal.

Table 2-1: Waste Generation Rates

Tenancy Use Type	City of Melbourne Guideline Reference	Refuse Generation Rate	Recycling Generation Rate
Tenancy 1	Shops (non-food)	50L/100m²/day	50L/100m²/day
Tenancy 2	Shops (non-food)	50L/100m²/day	50L/100m²/day
Childcare Centre	Childcare	350L/100m²/week	350L/100m²/week

2.3 Waste Generation Volumes

Waste generation is estimated by volume in litres (L) as this is generally the influencing factor when considering bin size, numbers and storage space required.

Waste generation volumes in litres per week (L/week) adopted for this waste assessment is shown in Table 2-2. It is estimated that the Proposal will generate 3,071L of refuse and 3,071L of recyclables each week.

Table 2-2: Estimated Waste Generation

Tenancy Use Type	Area (m^2)	Waste Generation Rate	Waste Generation (L/week)
Refuse			
Tenancy 1	85	50L/100m^2/day	298
Tenancy 2	141	50L/100m^2/day	494
Childcare Centre	651	350L/100m^2/week	2,279
		Total	**3,071**
Recyclables			
Tenancy 1	85	50L/100m^2/day	298
Tenancy 2	141	50L/100m^2/day	494
Childcare Centre	651	350L/100m^2/week	2,279
		Total	**3,071**

3 Waste Storage

Waste materials generated within the Proposal will be collected in the bins located in the Bin Storage Area, shown in Diagram 1, and discussed in the following sub-sections.

3.1 Internal Transfer of Waste

To promote positive recycling behaviour and maximise diversion from landfill, internal bins will be available throughout the Proposal for the source separation of refuse and recycling.

These internal bins will be collected by the staff/cleaners and transferred to the Bin Storage Area for consolidation into the appropriate bins. This internal servicing method may be conducted outside of main operational hours to mitigate disturbances to staff and visitors.

All bins will be colour coded and labelled in accordance with Australian Standards (AS 4123.7) to assist staff, visitors and cleaners to dispose of their separate waste materials in the correct bins.

3.2 Bin Sizes

Table 3-1 gives the typical dimensions of standard bins sizes that may be utilised at the Proposal. It should be noted that these bin dimensions are approximate and can vary slightly between suppliers.

Table 3-1: Typical Bin Dimensions

Dimensions (m)	Bins Sizes		
	240L	660L	1,100L
Depth	0.730	0.780	1.070
Width	0.585	1.260	1.240
Height	1.060	1.200	1.330

Reference: SULO Bin Specification Data Sheets

3.3 Bin Storage Area Size

To ensure sufficient area is available for storage of the commercial bins, the amount of bins required for the Bin Storage Area was modelled utilising the estimated waste generation in Table 2-2, bin sizes in Table 3-1 and based on collection of refuse and recyclables 2 times each week.

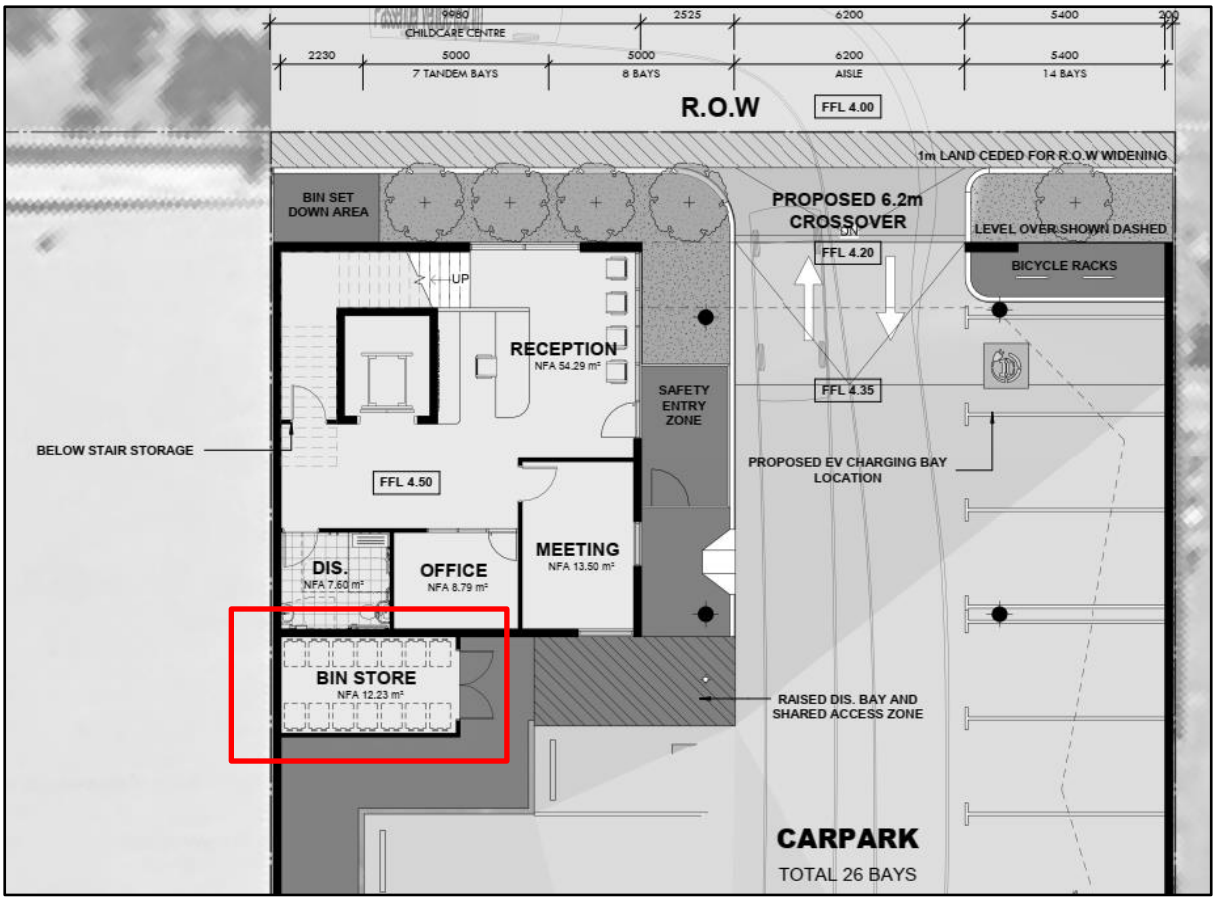
Based on the results shown in Table 3-2, the Bin Storage Area has been sized to accommodate:

- Seven 240L refuse bins; and
- Seven 240L recycling bins.

Table 3-2: Bin Requirements for Bin Storage Area

Waste Stream	Waste Generation (L/week)	Number of Bins Required		
		240L	660L	1,100L
Refuse	3,071	7	3	2
Recycling	3,071	7	3	2

Diagram 1: Bin Storage Area



3.4 Bin Storage Area Design

The design of the Bin Storage Area will take into consideration:

- Smooth impervious floor sloped to a drain connected to the sewer system;
- Taps for washing of bins and Bin Storage Area;
- Adequate aisle width for easy manoeuvring of bins;
- No double stacking of bins;
- Doors to the Bin Storage Area self-closing and vermin proof;
- Doors to the Bin Storage Area wide enough to fit bins through;
- Ventilated to a suitable standard;
- Appropriate signage;
- Undercover where possible and be designed to not permit stormwater to enter into the drain;
- Located behind the building setback line;
- Bins not to be visible from the property boundary or areas trafficable by the public; and
- Bins are reasonably secured from theft and vandalism.

Bin numbers and storage space within the Bin Storage Area will be monitored by the building management during the operation of the Proposal to ensure that the number of bins and collection frequency is sufficient.

4 Waste Collection

A private waste contractor will service the Proposal and provide seven 240L bins for refuse and seven 240L bins for recyclables.

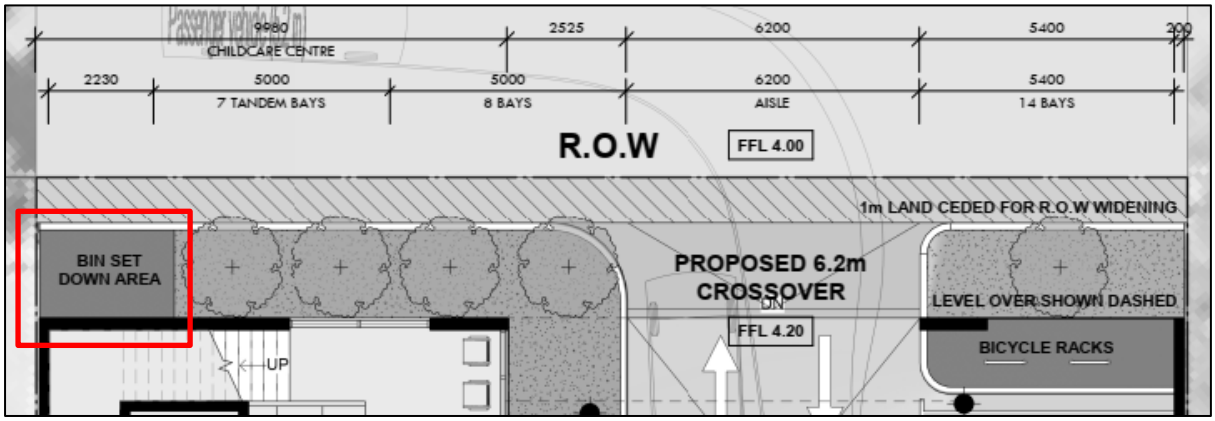
The private contractor will collect refuse and recyclables two times each week from the Proposal via the Bin Presentation Area on ROW/laneway, as show in Diagram 2.

Servicing will be conducted outside of peak operating hours of the Childcare Centre (mid-afternoon) and to occure between 7am and 7pm to allow the waste collection vehicle to mitigate impacts on local traffic movements during peak traffic hours.

Bins will be presented for collection 1m from the verge with the wheels and handles facing away from the street. The bins will remain clear of obstructions such as power poles, signs and street trees, and will be placed so as not to obstruct pedestrians, footpaths or bike lanes. Bins will be lined up neatly and in a single row along the verge, with sufficient space between each bin to facilitate collection by the private contractor's side arm waste collection vehicle.

Building management will ferry the bins to and from the Bin Storage Area and the Bin Presentation Area on collection days. The travel path between the Bin Storage Area and the Bin Presentation Area will be of flat surface and kept free of obstacles. Building management will return the bins to the Bin Storage Area as soon as possible on the same day following collection.

Diagram 2: Bin Presentation Area



4.1 Bulk and Speciality Waste

Bulk and speciality waste materials will be removed from the Proposal as they are generated. Removal of these wastes will be monitored by building management, who will liaise with staff and cleaners to assist with the removal of these wastes, as required.

Sanitary wastes from the Childcare Centre will be collected in situ. A suitably qualified sanitary waste collection and disposal provider will be engaged to determine storage and collection requirements.

5 Waste Management

Building management will be engaged to complete the following tasks:

- Monitoring and maintenance of bins and the Bin Storage Area;
- Cleaning of bins and Bin Storage Area, when required;
- Ferrying of bins to and from the Bin Storage Area and Bin Presentation Area on collection days;
- Ensure all staff and cleaners at the Proposal are made aware of this WMP and their responsibilities thereunder;
- Monitor staff and cleaners behaviour and identify requirements for further education and/or signage;
- Monitor bulk and speciality waste accumulation and assist with its removal, as required;
- Regularly engage with staff and cleaners to develop opportunities to reduce waste volumes and increase resource recovery; and
- Regularly engage with the private contractors to ensure efficient and effective waste service is maintained.

6 Conclusion

As demonstrated within this WMP, the Proposal provides a sufficiently sized Bin Storage Area for storage of refuse and recyclables based on the estimated waste generation volumes and suitable configuration of bins. This indicates that an adequately designed Bin Storage Area has been provided, and collection of refuse and recyclables can be completed from the Proposal.

The above is achieved using:

- Seven 240L refuse bins, collected two times each week; and
- Seven 240L recycling bins, collected two times each week.

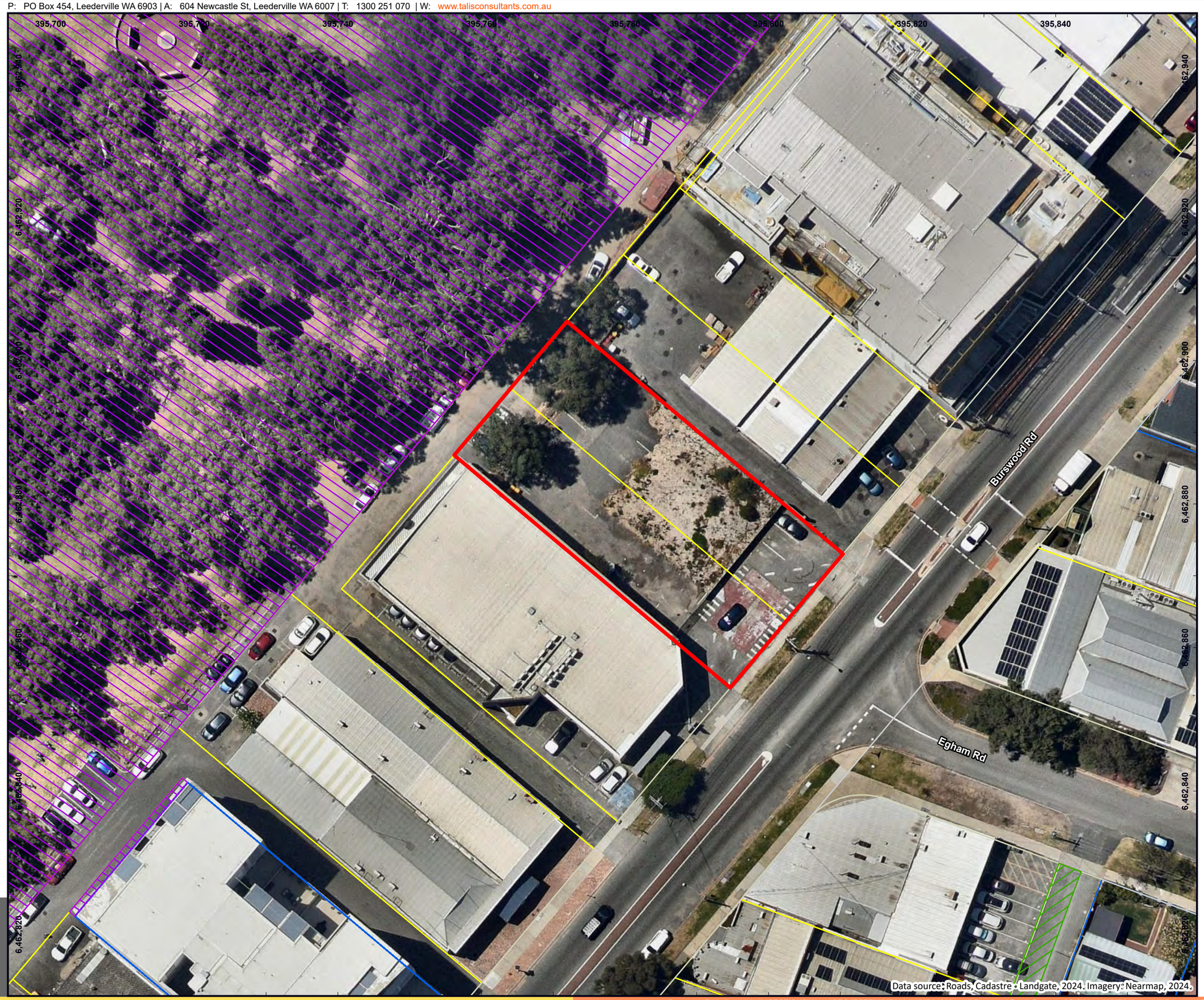
A private contractor will collect refuse and recyclables from the Proposal via the Bin Presentation Area on ROW/laneway.

Building management will oversee the relevant aspects of waste management at the Proposal.

Figures

Figure 1: Locality Plan

P: PO Box 454, Leederville WA 6903 | A: 604 Newcastle St, Leederville WA 6007 | T: 1300 251 070 | W: www.talisconsultants.com.au



LEGEND

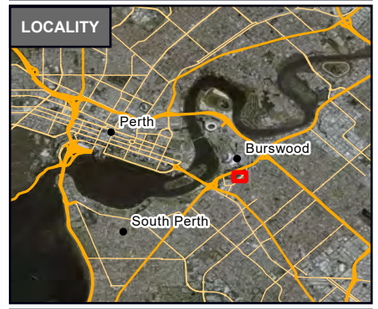
- Site Boundary

Cadastre

- Crown Allotment
- Freehold
- Road
- Strata Plan or Lot
- Easement
- Reserve

© Talis Consultants Pty Ltd ("Talis") Copyright in the drawings, information and data recorded in this document ("the information") is the property of Talis. This document and the information are solely for the use of the authorised recipient and this document may not be used, transferred or reproduced in whole or part for any purpose other than that which it is supplied by Talis without written consent. Talis makes no representation, undertakes no duty and accepts no responsibility to any third party who may use or rely upon this document or the information.

LOCALITY



0 2 4 6 8 10 km

LOCALITY

147 Burswood Road
Burswood WA 6100

Ekta Holding Pty Ltd

N 0 5 10 15 20 m

Coordinate System: GDA2020 MGA Zone 50
Scale @ A3: 1:500

Prepared:	E Jackson	Date:	12/02/2024
Reviewed:	A Brouwer	Revision:	A
Project:	WMP24018		

talis consultants

Figure 01

Assets | Engineering | Environment | Noise | Spatial | Waste

Talis Consultants
ABN 85 967 691 321

HEAD OFFICE
604 Newcastle Street,
Leederville
Western Australia 6007

PO Box 454,
Leederville
Western Australia 6903

NSW OFFICES
Nowra
76 Bridge Road, Nowra
New South Wales, 2541

PO Box 1189, Nowra
New South Wales, 2541

Newcastle
58 Cleary Street, Hamilton
New South Wales, 2303

P: 1300 251 070
E: enquiries@talisconsultants.com.au

Additional Investigations

147 Burswood Road, Burswood WA

Prepared for Elven Property

11 March 2025

Project Number: 20240730_147 Burswood Road

DOCUMENT CONTROL				
Revision	**Description**	**Date**	**Authorised by**	**Issued to**
A	Revision A	11/03/2025	S. Mueller	Elven Property

Approval for Release

Name	Position	File Reference
Sam Mueller	Managing Director	20240730_147 Burswood Road Additional Investigations

Signature



Copyright of this document or any part of this document remains with West Soil and Water and cannot be used, transferred, or reproduced in any manner or form without prior written consent from West Soil and Water.

Executive Summary

Background

West Soil and Water (WSW) was commissioned by Elven Property Pty Ltd (the Client) to undertake additional contamination investigations at 147 Burswood Road, Burswood Western Australia (the Site).

The Site historically operated as a service station and automotive mechanic, with service stations listed as 'potential contamination industries, activities, and land uses' as per the *Assessment and management of contaminated sites*, Department of Water and Environmental Regulation, 2021 (DWER, 2021). The Client proposes to redevelop the Site as a childcare centre.

An initial assessment was undertaken by WSW in March 2023 (report reference: 20230311_147 Burswood Road_Rev 0) with investigation outcomes indicating that low level contamination of site soils (benzo(a)pyrene, nickel, zinc), and potentially groundwater, had occurred. It was recommended that a Form 1 for the site (a reporting of known/suspected contamination) and the investigation report be submitted to the Department of Water and Environment Regulation (DWER) for comment.

Following submission, DWER updated the classification status of the site to 'Possibly contaminated – investigation required', with comment being that the site is current unsuitable to house a childcare centre until further site investigation can confirm the contamination status of the site.

DWER has requested that this investigation involve the additional characterisation of soil and groundwater quality onsite is undertaken prior to any withdrawal of the contamination classification. As such, the client has engaged WSW to undertake this investigation. Shandel Coleman (Luna Environmental) (the auditor) has been engaged as the Auditor on this project and will prepare a Mandatory Auditors Report (MAR).

Site Setting

The Site comprises of two discrete cadastral 'lots' which have essentially operated as a single lot since the 1960s. These two lots have a combined area of approximately 1,224m^2. Historically, the Site operated as a service station and automotive mechanic, however records indicate that the former underground storage tanks (USTs) were removed in 1997, and remaining site structures were demolished in 2022. The site has been used as a carpark since ~2010.

The site is currently vacant with the exception of some car parking along Burswood Road.

Proposed Use

147 Burswood Road it is currently zoned 'office/residential'. The redeveloping into a childcare centre will constitute a change to a more sensitive landuse. The redevelopment of the Site will most of the area being occupied by either the building footprint or sealed carpark, with the childcare centre itself being located on the first floor. A small, raised car park kerb is currently proposed in the north-eastern portion of the Site, which is anticipated to be the only potential location for planted vegetation.

Site Inspection

No significant information is presented form the site inspection. The site remains undeveloped and mostly sealed, with gated access and no site drainage system.

The cleared area has significant grass/weed coverage because of the assessment being undertaken in mid to late spring.

Soil Investigation

A targeted soil investigation was undertaken at the site which included the sinking of eleven (11) soil bores to varying depths, to a maximum recorded depth of 3.0mbgl. These soil bores further targeted areas of suspected fuel infrastructure (former USTs, fuel lines etc.) and former building footprint locations.

The generalised soil profile was a coarse grained, calcareous SAND which appeared to have been reworked along the western areas of the Site primarily, with rubble identified within the soil profile.

Soil samples were subject to infield screening for VOCs using a PID, with results indicating a negligible presence of volatile hydrocarbons in soil.

Soil Laboratory Analysis

Soils across the Site were subject to an initial analysis for a suite of COPCs including screen metals and metalloids (arsenic, cadmium, chromium (total), copper, lead, mercury, nickel, and zinc), TRH, BTEX-N, PAHs, Organochlorine (OC) and Organophosphorus (OP) Pesticides and Semi volatile Organic Compounds (SVOCs).

Laboratory analysis reported the majority of COPCs to be below the adopted assessment criteria, including HIL-A/HSL-A, EIL/ESL in an Urban residential areas and public open space, TRH Management limits for residential, parkland and public open space. This was with the exception of the following:

- TRHs (F3) exceeded the adopted ESL at two (2) locations;
- Benzo(a)pyrene exceeded the adopted ESL at three (3) locations;
- Aldrin and dieldrin (combined) exceeded the adopted HIL at one (1) location;
- Copper exceeded the site specific (Fresh) EIL at eleven (11) locations;
- Lead exceeded the HIL-A and the site specific (Fresh) EIL at three (3) locations;
- Nickel exceeded the site specific (Fresh) EIL at eight (8) locations;
- Zinc which exceeded both site specific (Fresh & Aged) EIL at fourteen (14) locations.

Previous Soil Investigations

Investigations undertaken in 2023 indicted the following:

- TRH, BTEX, Fuel oxygenates, Halogenated Aliphatic Compounds did not record any exceedance of adopted guideline, and in general, were below the laboratory PQL.

- Benzo(a) pyrene was detected above adopted ESL guideline at a total of 5 sample locations (between 0.5 and 1.5 mbgl). These results exceeded HIL-A guidelines at two sample locations, at 1.0 mbgl and 1.5 mbgl.

- Zinc exceeded EIL guidelines at 6 sample locations, between 1 mbgl and 1.5 mbgl.

Soil Risk Assessment

From a human health perspective, the reported lead Benzo(a) pyrene and combined aldrin/dieldrin result are considered to pose a low risk to future site occupants given the proposed development plan of the building which will result in the soil surface sealed below either the building footprint, carpark and/or adjacent walkways, with the childcare centre located on the first floor of the complex. As such, physical contact with affected soils is not considered possible upon development conclusion and no plausible link between contaminant and receptor can be identified.

While there is a partial exposure pathway for onsite workers during the excavation phase of development activities, which could present a moderate exposure risk, by preparing appropriate risk management procedures within a site-specific construction and environment management plan (CEMP), and implementing them, the site can be considered low risk. The CEMP should also

incorporate potential exposure to bystanders/pedestrians that could be at risk of exposure during excavation activities.

There is only one (1) location on the current plan where vegetation is likely to be grown (ornamental), in the northeast portion of the site (carpark raised kerb). As such, it is considered unlikely that chemical uptake by flora will occur. It is considered that exceedances of ecological guidance noted within site soils do not pose a risk to any nearby receptors or future use of the site, with additional reference to groundwater results.

Groundwater Investigation

Prior to this investigation, a network of three (3) preexisting groundwater monitoring wells (GW01-GW03) were present at the Site (installation date unknown). Based on comments by the site auditor, a fourth monitoring well (GW04) was installed adjacent to the western site boundary.

Groundwater Laboratory Analysis

Groundwater samples were subject to analysis of the same suite of COPCs as the soil samples, being screen metals and metalloids (arsenic, cadmium, chromium (total), copper, lead, mercury, nickel, and zinc), TRH, BTEX-N, PAHs, Organochlorine (OC) and Organophosphorus (OP) Pesticides and Semi volatile Organic Compounds (SVOCs).

The laboratory analysis reported most COPCs to be below the adopted assessment criteria, aside from:

- Zinc which exceeded its ANZAST, 2018 Fresh Water 95% assessment criteria at GW04 (newly installed western boundary bore).

Previous Groundwater Investigations

Investigations undertaken in 2023 indicted the following:

- TRH, BTEX, Fuel oxygenates, Halogenated Aliphatic Compounds and PAH were below the laboratory PQL in all (3) groundwater bores.
- Zinc exceeded the Freshwater guidelines at MW02 and MW03.
- Copper exceeded the Freshwater guidelines at MW01 and MW03.

Groundwater Risk Assessment

Within this investigation sampling event, elevated zinc was detected GW04, with this monitoring well situated cross-hydraulic gradient of the Site; therefore, the site may be the source of the zinc, noting however that the other three (3) wells recorded concentrations slightly below the guideline, suggesting zinc may be naturally elevated in local groundwater. This is assessment is compounded by zinc tending to not be a contaminant associated with petroleum or diesel.

The area surrounding the Site has been commercial/industrial since the 1960s/70s, which most likely has resulted in the deterioration of groundwater quality in the area. In terms of sensitive receptors, the artificial wetlands at GO Edwards Park are down hydraulic gradient, however, no exceedance of noted metals is observed in the groundwater bore down hydraulic gradient of the site.

While the Swan River is located down hydraulic gradient, it is at a distance of ~600m. Across this distance, any impacts originating from the Site would be subject to dispersion and diffusion, resulting in a reduction in concentrations of any COPCs. Therefore, the identified zinc exceedances are considered to pose a low risk to the Swan River, including its riparian zone.

It is considered that the site does not pose a risk to nearby ecological receptors.

Conclusions

Based on the investigation undertaken, the following conclusions have been drawn:

- Overall, it appears that the use of the Site as a service station and automotive mechanic has resulted in some contamination to the soil profile and minimal impacts to site groundwater.
- The soil analytical results indicted some exceedances of various adopted guidelines for TRH, PAHs (benzo(a)pyrene), OC/OPs (aldrin and dieldrin – combined) and metals (copper, lead, nickel, zinc). With these contaminants delineated.
- The groundwater investigation results indicted concentrations below adopted guideline levels with the exception of Zinc which was not noted down-hydraulic gradient of the site.
- The proposed redevelopment of the site will result in a mostly encapsulated (sealed site) with the most sensitive land use (childcare) located on the first floor of the proposed development. As such, no plausible linkage between exceedances of health investigation levels and site users can be ascertained.
- There may be some risk to future onsite workers excavating soils during development and adjacent pedestrians, the risk can be minimised to low through the design and implementation of appropriate risk management controls.
- No ecological risk is noted to exceedances of contaminants in site soils or groundwater, based on the proposed development. The risk from impacted groundwater is considered low and not noted to be migrating from site. The closest possible receptor would be deep rooted trees within GO Edwards Park. It is considered that trees in the park have likely adapted to a deteriorated groundwater quality, with the surrounding area being commercial/ industrial since the 1960s/70s. The next closest receptor is the Swan River, which is located at a distance of ~600m. Across the distance, any potential contamination originating at the Site would be subject to diffusion and dispersion, reducing its concentration and the risk the contaminant poses.

In summary, the site soils and groundwater have been appropriately investigated with reference to historical use of the site and consideration of the proposed development. The current design for the childcare centre and associated carpark indicates that most identified exceedances would fall beneath the footprint of the building or carpark areas, breaking the exposure pathway linkage.

Slightly elevated concentrations of dissolved zinc within the groundwater are not anticipated to pose a risk to local receptors (groundwater, surface expressions (Swan River), GO Edwards Park) based on dilution effect provided by groundwater (diffusion and dispersion) and the lack of significant receptors being directly adjacent to the site.

Based on these findings, it is considered that the site poses negligible risk to human health and environmental receptors both on and offsite.

Recommendations

Based on the findings of the investigation, the following is recommended:

- Based on the findings of the investigations undertaken, it is considered here that noted contaminants onsite are contained within the site and pose no risk to human or ecological health based on the proposed development, which would warrant re-classification to ‘decontaminated’ under the Contaminated Sites Act (2003).
- This report is to be submitted to the Auditor for preparation of a Mandatory Auditors Report.
- For any future site development works, a Site Management Plan (SMP) and/or Construction and Environmental Management Plan (CEMP) should be prepared to mitigate against any risk during construction activities.

May 2025

147 Burswood Road

Sustainable Design Assessment Report

Graham Agar
FULL CIRCLE DESIGN SERVICES

Full Circle Design Services	
Telephone: 0412 475 819	**Report №:** 2021_078_ESD_REP_02
E-mail: graham.agar@fcds.com.au	**Original Date of Issue:** 28th April 2025
ACN: 163 742 890	
ABN: 84 163 742 890	

Title:	147 Burswood Road – Sustainable Design Assessment Report
Author :	Graham Agar
Client:	Rowe Group
Contact:	Declan Allcock
Description:	This report provides a brief summary of the proposed sustainable design strategy for the proposed commercial development at 147 Burswood Road . The report outlines overall intent and sustainable design features to be included within the design, as well as an overall assessment of the expected outcome for the project.

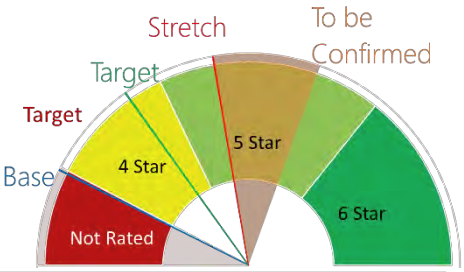
Revision	Date	Checked by		Transmitted by	
A	27th April 2025				GEA
B	4th May 2025		GEA		GEA

Distribution	Revision								
Receiver	**A**	**B**							
Rowe Group Design	X	X							
Elven Property	X	X							
Meyer Shircore	X	X							
Consultant Team		X							
Builder									

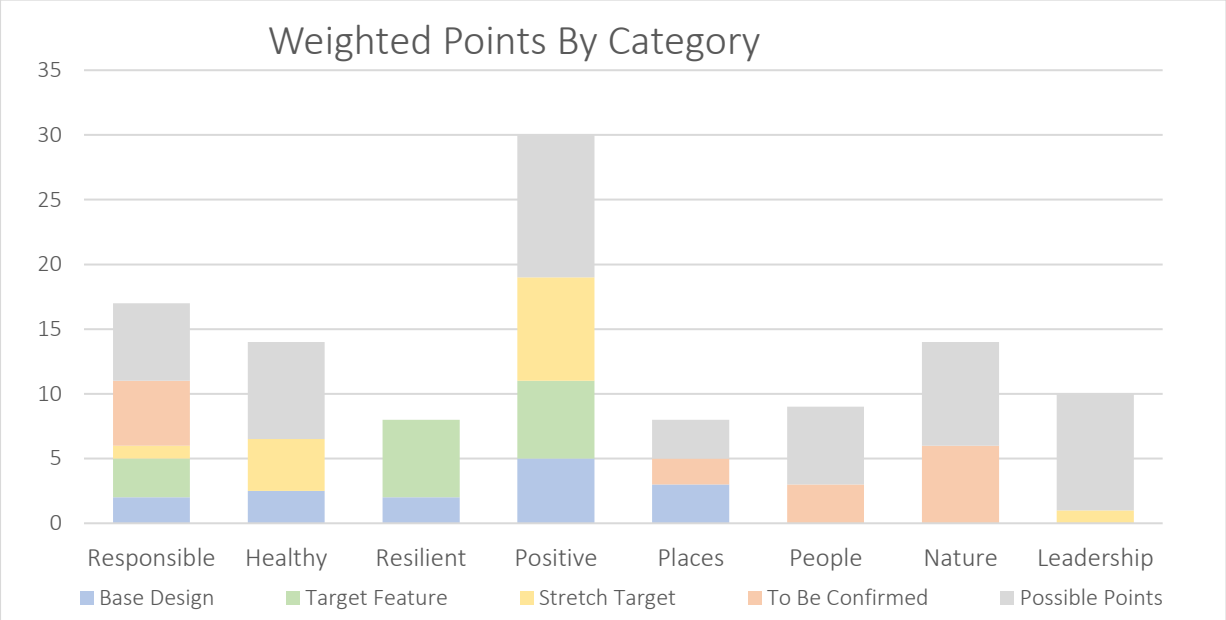
Executive Summary

FCDS have been commissioned to provide general sustainable design advice and briefing services for the proposed new commercial development at 147 Burswood Road.

The project is aiming to achieve at least 15 points (4 Star / Best Practice level) when self-assessed under the Green Star Buildings tool, in keeping with the Town of Victoria Park planning requirements. The project is considered too small for a formal certification, with likely certification and submission fees significantly more than the ESD budget and well in excess of sustainable design features.



FCDS assessment of the current project documentation indicates a minimum score of just under 15 points (4 Star) and an expected score of 29.5 points ~4.75 Star level.



Key features to be included to support a best practice outcome include:

- 20kW Peak Output Solar Array (nominal offset of more than 60 tonnes of $CO_{2(e)}$ per annum)
- Onsite battery to improve renewable energy utilisation
- Best Practice Operation and Maintenance Manuals
- Avoidance of fossil fuels on site
- Potential for nature plan
- Future flexible design change
- Ducted outside air provision to occupied spaces, with dedicated exhaust systems to manage indoor air quality.
- High efficiency services and appliances
- High performance building envelope – targeting 20% improvement over BCA minimum

As can be seen from the features and charts above, the project is placing a strong emphasis on management, energy efficiency and indoor environment quality, reducing operational costs and improving owner and occupant outcomes.

Contents

Executive Summary .....
1. Introduction 1
1.1 Site Description 1
1.2 Sustainability Targets 2
1.3 Green Star Buildings 3
1.3.1 Assessment Categories 4
1.4 Minimum Compliance Requirements 5
1.5 Project Approach 6
2. Responsible Design Features 7
2.1 Marketing Excellence 7
2.2 Environmentally Responsible Construction 7
2.3 Commissioning, Verification and Handover 7
2.4 Sustainable Design Professional 7
2.5 Operational Waste 8
2.6 Responsible Products & Procurement 9
3. Healthy Design Features 10
3.1 Ventilation System Attributes 10
3.2 Lighting Systems 10
3.3 Glare Control 10
3.4 Access to Daylight 10
3.5 Noise Levels 11
3.6 Connection to Nature 11
3.7 Low Toxicity Products 11
3.8 Amenity and Comfort 11
4. Resilient Design Features 12
4.1 Climate Change Resilience 12
4.2 Climate Change Risk Management 13
4.3 Operations Resilience 14
4.4 Grid Resilience: 14
4.5 Heat Resilience 14
5. Positive Design Features 15
5.1 Upfront Carbon Emissions 15
5.2 Energy Use 15
5.3 Energy Source 15

5.4 Water Use 15
5.5 Overall Footprint Reduction 15
5.6 Rainwater Reuse 16
6. Places Design Features 17
6.1 Active Transport 17
6.2 Sustainable Transport 18
6.3 Contribution to Place, Culture Heritage and Identity 19
7. People Design Features 20
7.1 Minimum Requirements 20
7.2 Needs Analysis 20
7.3 Accessible Navigation 20
8. Nature Design Features 21
8.1 Minimum Requirements 21
8.2 Ecological Value 21
8.3 Stormwater 21
9. Assessment Review 22
9.1 Items for Close Out 22
Appendix A – Design Assumptions and Actions 23
Building Owner: 23
Main Contractor: 23
Architectural: 23
Mechanical: 24
Electrical – Renewable Energy, Lighting and Power: 24
Hydraulic: 25
Civil / Structural: 25

1. Introduction

FCDS have been commissioned to provide general sustainable design advice and briefing services for the proposed new commercial development at 147 Burswood Road.

The project is aiming to achieve at least 15 points (4 Star / Best Practice level) when self-assessed under the Green Star Buildings rating system in accordance with the local planning requirements.

FCDS note that, with a relatively small project, the cost of formal certification (consultant fees and registration costs) would far exceed the cost of actual sustainable design features and, as such, is not suitable for this project. In lieu, the project is completing self-assessment, with this report – and similar assessment and justification at Building License – demonstrating compliance.

1.1 Site Description

The proposed project is a commercial development in Burswood, including two small commercial tenancies and a childcare facility for around 85 children. The design also has flexibility potential for future change to residences.



The design includes on site renewable generation, with an intent to provide batteries to improve grid resilience and reduce site carbon emissions.

1.2 Sustainability Targets

The project is aiming to achieve at least 15 points (4 Star / Best Practice level) when self-assessed under the Buildings rating system. This is in no way equivalent to a formal certification, however, considering the size and nature of the building is considered a better balance between sustainable design features and performance verification.

Design features to prioritise energy efficiency and simplification of operations as well as improving occupant comfort are being prioritised.

Category	Target	Design Team Response
General Sustainability	Best Practice Design	The project is targeting a self-assessment to 15 points under the Green Star Buildings tool – representative of 4 stars – Best Practice.
	Operational Performance	Monitor and tune building performance in operation – targeting <60MWhrs per annum.
Energy Consumption	10% Envelope Improvement over BCA	R4.5 roofs, R2 wall insulation, high performance glazing.
	30% Overall Improvement over BCA	Energy efficiency services Automated controls
	Renewable Energy	The project should include a large solar photovoltaic array, up to around 20kW peak generation
Water Consumption	Low Flow Tapware	Ensure all taps, showers, WC's, urinals, dishwashers and washing machines provided are within 1 star of the best available WELS rating.
	Waterwise Irrigation	Utilise drought tolerant and native planting where possible. Utilise rain / moisture sensing and sub-soil drip irrigation for all planted areas.
Waste Targets	75%+ Recycling in operation	Design to facilitate capture of recyclable goods and use of comingled recycling. Minimum three waste streams to be collected.
	>90% Recycling in construction	Use of high efficiency resource recovery facility to sort waste in construction.
Durability	>10 Years for Common Area Finishes	Internal finishes shall target >10 year life spans, with minimal repair and maintenance rather than regular replacement.
Indoor Environment Quality	Mixed Mode Operation	Key spaces to be able to function in air conditioned or naturally ventilated modes.

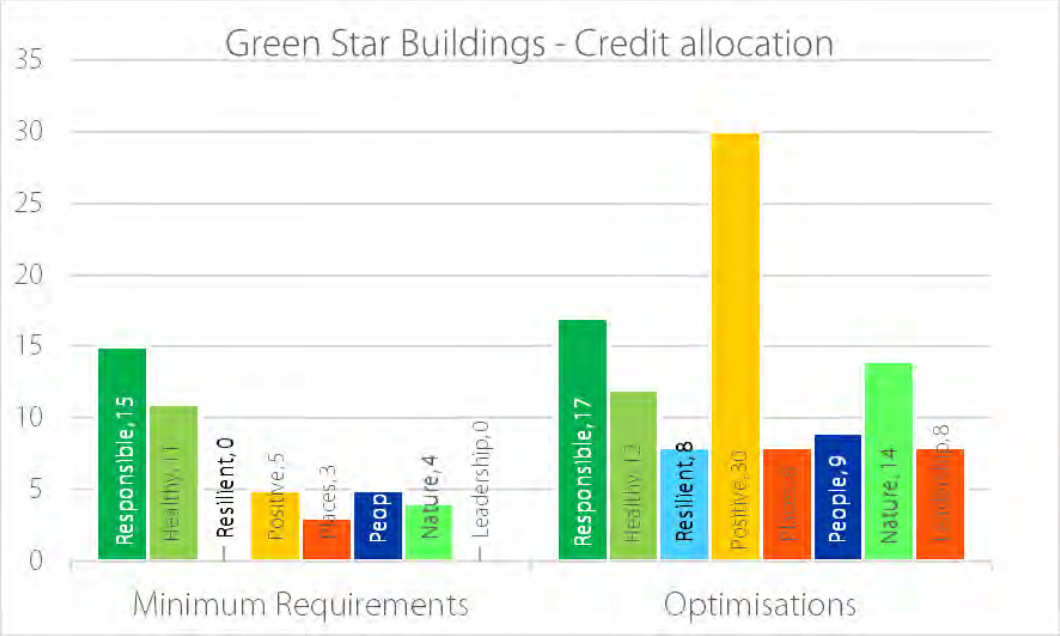
The project is aiming to undertake a self-assessment only, using the Green Star Buildings tool as a benchmark. Building modelling will be simplified and based primarily on recent experience rather than full reporting and performance justification.

1.3 Green Star Buildings

Green Star Buildings assesses proposed facilities for people against a number of sustainable design metrics, specifically, the tool requires that buildings:

- Protect of environmentally significant areas
- Reduce carbon emissions in construction and operations, aligning with a pathway to Net Zero by 2030
- Aare water efficient
- Provides a high quality indoor environment
- Promotes physical activity
- Consider and address climate change impacts
- Reduces environmental impacts during construction
- Embraces diversity
- Reduces operational waste
- Undergoes performance verification

Performance is assessed across a number of categories, as described below. Many credits have an emphasis of planning and consultancy:.



Projects have a relatively low percentage requirement to achieve certification as best practice as only 15% above minimum performance requirements, however, a 6-Star certification requires design team to achieve almost three quarters of all available optimisations.

Star Rating	Buildings
4 Star – Best Practice	15 Points
5 Star – Australian Excellence	35 points
6 Star – World Leadership	70 Points

1.3.1 Assessment Categories

Buildings	Sustainable Design Features
Responsible	Features which are intended to minimise ecological footprint by control of the design, construction and commissioning process. The features also include elements to optimise operational performance through design of effective spaces and measuring consumption.
Healthy	Features aiming to ensure the building provides a strong response to occupant health and wellbeing.
Resilient	Rewards projects preparing and for the imminent impacts of climate change, including provision of support to the surrounding community. Shocks to power infrastructure, ongoing weather pattern adjustment and the urban heat island effect
Positive	Design elements which contribute positively to the environment. Buildings must minimise harm as a starting point and also act as a restorative force for good to achieve points.
Places	Features which reflect outcomes that are linked to the location and nature of the development. Points are achieved by reducing the impacts of transport – on the environment and occupant health.
People	Features which improve social sustainability outcomes within the development and community.
Nature	Features and design solutions which prioritise and restore the natural environment around prospective developments
Leadership	The category for projects to demonstrate leadership beyond the scope of the current Green Star framework, addressing Challenges which have been developed by the GBCA or which break barriers and inspire others to follow.

1.4 Minimum Compliance Requirements

The Green Star Buildings Tool has a number of minimum requirements with respect design and delivery that are a mandatory requirement for certification. The table below provides a summary of the requirements and proposed approach. Refer specific sections of this document for additional information and contractor requirements to demonstrate delivery of minimum expectations:

Category / Credit		Project Approach	Contractor Requirements?
Responsible	Responsible construction.	The project will be delivered under a site specific environmental management plan (EMP) to best practice standards.	Main Contractor and All Sub-Contractors.
		The project will divert a minimum of 90% by mass of all construction and demolition waste on site.	
		Sustainability, health and well-being training and support shall be delivered on site as part of standard contractor practice.	
		The building envelope shall be detailed to avoid leakage. No testing undertaken to verify outcomes.	
		The main contractor shall implement a suitable environmental management system to oversee the delivery of the plans.	
	Verification and Handover	The building is to be commissioned to CIBSE Commissioning codes, including generation of detailed commissioning reports.	All trades.
		The building has a metering and meter monitoring system with remote access.	Electrical / EMS provider
		The building will utilise low toxicity products for finishes, adhesives and sealants.	Main Contractor
		The building will complete acoustic design review, targeting low noise levels, separation of quiet spaces and appropriate reverberation.	Main contractor, design team
		The building will undergo performance monitoring and tuning over the 12 month defect liability period.	Mechanical and Electrical.
	Responsible Resource Management	The building has been designed with a waste management strategy to minimise operational waste generation and divert from landfill.	Nil
Healthy	Clean Air	The project includes controlled outside air delivery systems at or above AS 1668.2 requirements. Naturally ventilated spaces comply with AS 1668.4.	Mechanical Builder
		Air conditioning systems control outside air provision and thereby control CO_2 in the space. No active control is provided.	Mechanical
		All systems are provided with relevant filtration.	Mechanical
		Point source pollutants are exhausted directly outside – kitchens, print rooms etc	Mechanical
	Light Quality	Glare is managed internally by fixed shading, blinds and / or spatial provisions for future installation of blinds.	Builder
		Artificial lighting levels are designed to match proposed space use. Light fittings manage glare and are of a high quality.	Electrical
	Acoustic Comfort	Internal noise levels are managed through plant selection and building fabric.	Builder, mechanical.
	Exposure to Toxins	All paints, adhesives, sealants and carpets are to be low VOC and the contractor is to obtain approval for the use of any such product in internal spaces prior to application on site.	All contractors
		Engineered Wood Products are to be low formaldehyde	Builder
		The building is to be free of all lead, asbestos and PCBs.	Demolition contractor.

Category / Credit		Project Approach	Contractor Requirements?
Resilient	Climate Change Resilience	The project has addressed key risks associated with climate change and has implemented strategies to address them, including: - Building envelope exceeds minimum requirements of BCA Section J - The building has the capacity to accept energy generated on site and has batteries to improve on site utilisation. - Water consumption is monitored and efficient landscaping and tapware / appliances have been selected.	Nil
Positive	Upfront Carbon Emissions	The building has selected materials to reduce upfront carbon emissions by at least 10%, including: - Replacing a portion of cement within relevant concrete mixes - Sourcing steel from responsible manufacturers. - Prioritising sustainably certified products for finishes, insulation, plant and materials. - Implementing waste diversion practices on site - Implementing a site specific environmental management plan.	Builder LCA Modeller QS
	Energy Use	The building is to consume at least 10% less energy than a BCA compliant building, both in envelope and services. Design features include efficient plant, lighting, controls and building envelope.	Builder, all services contractors
	Energy Source	The building has been designed to eliminate the use of fossil fuels on site in future. Spatial allowance have been made for the use of heat pumps for hot water, cooking and heating. Solar hot water system is provided	Electrical and Hydraulic contractor
	Water Use	The building includes water efficient fixtures and appliances.	Hydraulic contractor and landscaper
Places	Movement and Place	The building includes showers, lockers and change areas suitable for occupants to undertake active transport, to and from the building as well as to participate in physical activities at other times. The design includes for visitor bike parking, including connection to local pedestrian infrastructure.	Builder, Landscaper and Hydraulic contractor
People	Inclusive Construction Practices	The construction process is to include gender appropriate facilities and personal protective equipment.	Builder
Nature	Impact to Nature	The development site has been selected, and the construction planned to avoid damage to ecologically sensitive sites and, as far as practical, act as a restorative force through the inclusion of native planting in landscaped areas	Builder and Landscaper

1.5 Project Approach

The design team are focusing on providing an efficient, durable and effective internal environment. As such, design features within the Healthy, resilient and positive categories are being prioritised.

Features within the Places, People and Nature categories are largely set by project location and nature.

The following sections present a summary of the project approach within the various categories.

2. Responsible Design Features

The Responsible category refers to credits which are intended to minimise ecological footprint by control of the design, construction and commissioning process. The features also include elements to optimise operational performance through design of effective spaces and measuring consumption.

The following section outlines FCDS expectation with respect the Responsible design elements intended to be included by the project team:

2.1 Marketing Excellence

The design team will produce documentation to describe sustainable design features of the development for key stakeholders – including prospective occupants of each dwelling.

2.2 Environmentally Responsible Construction

The main contractor will be expected to implement an environmental management system, using ISO 14001 practices to monitor its implementation on site.

The plan will include waste management and minimisation, targeting a minimum of 90% of construction and demolition waste diversion from landfill.

Contractors visiting site for more than 3 days will be required to undertake site familiarisation and sustainable design training covering design features for this development, as well as a wider overview of sustainability issues.

2.3 Commissioning, Verification and Handover

The design team have been provided clear design targets for environmental performance – refer to Section 1.2 above.

The designers and contractors will complete a constructability and maintainability review as part of the shop drawing process.

Commissioning will be in accordance with best practice international standards, including CIBSE, ASHRA and Airah. The building envelope will be designed to minimise air leakage. There is no intention to test prior to practical completion.

Building performance will be closely monitored over the first 12 months of operation to minimise performance issues and optimise operational efficiency against design targets.

The designers will include meters for each tenancy, utilising utility meter reading systems to monitor and report on performance.

Detailed handover documentation will be provided to building stakeholders in electronic format, including As Built drawings and functional control descriptions.


Green Building Council Australia

Green Building Council of Australia

certifies that

Graham Agar

has obtained the following qualification

Green Star® Accredited Professional

The Green Star® Accredited Professional qualification recognises advanced knowledge and experience in sustainability, and competency in the application of the Green Star® rating tools.

Jul 2010 – Jun 2021 (Continual Enrolment)

greenstar Accredited Professional

Davina Rooney

Davina Rooney
Chief Executive
Green Building Council of Australia

2.4 Sustainable Design Professional

The project team have included sustainable design considerations from schematic design phase and will continue through to practical completion and beyond.

2.5 Operational Waste

The design team will be ensuring that the project is effectively designed to manage operational waste across metrics including sizing, segregation of waste streams and accessibility for waste contractors.

Based on the Randwick City Council guide for waste generation rates (referenced GBCA best practice guide), the development would be expected to generate around 3,050 L of waste and 3,500 L of recyclables per day;

Usage		Daily Generation Rate		Weekly Generation Rate	
		Waste	Recycling	Waste	Recycling
Education	85 Students	128	43	638	213
Office	76 m^2	8	19	38	95
Total		**137**	**63**	**677**	**320**
240 L Bins		**1**	**1**	**3**	**2**
660 L Bins		**1**	**1**	**2**	**1**

The site has a central waste store at ground floor level, located conveniently for all users and has level access to the bin collection point.



The store meets Green Star requirements, as follows:

Criteria	Requirement	
Distance of Travel	<10m between waste store and vehicle	Not Compliant – 35m
Path of Travel	Free from curbs and grade change.	Compliant
Clearance	Maintain >4m clearance for collection vehicles	Compliant

FCDS consider the bin store location to be a fair compromise for accessibility for staff and collection contractors.

2.6 Responsible Products & Procurement

The design will include sustainable procurement requirements across a range of products, including:

- Steel
- Concrete
- Refrigerant
- Floor Coverings
- Paints
- Adhesives and Sealants
- Blinds
- Glass
- Wood Products
- Insulation
- Landscape
- Solar Panels

FCDS note the interiors / finishes are expected to meet compliance levels through products such as:

• Armstrong Perforated Plasterboard	Low carbon, EPD
• Autex Acoustic Finishes	Green Tag – Level A
• Forbo Flooring	EPD, Green Tag – Level A, Declare Compliant
• Laminex Laminate	E0, FSC Certified, Green Tag Level A, E0 Rated
• Shaw Contract Carpet	Low VOC, Green Tag Compliant
• Dulux Paints EvirO2	Low VOC, EPD, product stewardship





3. Healthy Design Features

The Healthy credit category is about ensuring the building provides a strong response to occupant health and wellbeing. Features supporting air quality, views, access to light and noise contribute to point scoring within this category:

3.1 Ventilation System Attributes

Outside air and natural ventilation systems are to comply with the prescriptive requirements of AS 1668.2 (mechanical ventilation) and AS 1668.4 (natural ventilation) for air quantity, intake location and exhaust separation.

Compliance can be achieved either though outside air rates being increased by at least 50% over the minimum requirements of the Australian Standards, or are controlled by CO_2 detection systems to maintain low concentrations within the breathing zone or by meeting AS1668.4 for natural ventilation.

Local exhaust systems are to be provided to isolate occupied spaces from contamination such as kitchens.

3.2 Lighting Systems

Lighting systems are to be flicker free and provide a minimum Colour Rendering Index (CRI) average > 85 with a maximum of 3 MacAdam Ellipses.

The design will meet best practice illuminance levels for each task within each space type with a maintained Illuminance values must achieve a uniformity of no less than that specified in Table 3.2 of AS/NZS 1680.1:2006

3.3 Glare Control

External shading systems will provide some coverage from direct solar penetration, however, the building orientation will require some internal blinds to provide full glare coverage. Translucent skylights are provided to reduce glare.

Lighting systems are to be provided with diffusers or other design features which maintain direct glare from the luminaries below the UGR (Unified Glare Rating) limit within AS 1680.1

3.4 Access to Daylight

All occupants have excellent access to natural lighting through strong passive design (north facing windows with overhangs) and relatively shallow plans. Skylights are provided to internal play areas:



3.5 Noise Levels

The use of high-quality mechanical plant and good architectural detailing will result in comfortable internal noise levels, generally matching AS 2107.

The design also includes walls and space layouts to limit noise carryover from loud to quiet spaces. Ceilings and finishes are expected to be detailed to limit reverberation within the space.

3.6 Connection to Nature

At least 60% (close to 100% for this project) of spaces are within 8m of a view to outside, including nature.

FCDS recommend the project team target the use of natural finishes and motifs to further promote the connection of users to nature.

3.7 Low Toxicity Products

The design team are expected to select finishes and composite wood products with low Volatile Organic Compound (VOC) and low formaldehyde content. This includes joinery, carpets, adhesives and sealants. Wall and ceiling paints will target a level <5 g/L for VOC content.

3.8 Amenity and Comfort

The project includes ample space for occupants and visitors to promote mindfulness, inclusivity and physical activity, including external play space and dedicated staff areas.

4. Resilient Design Features

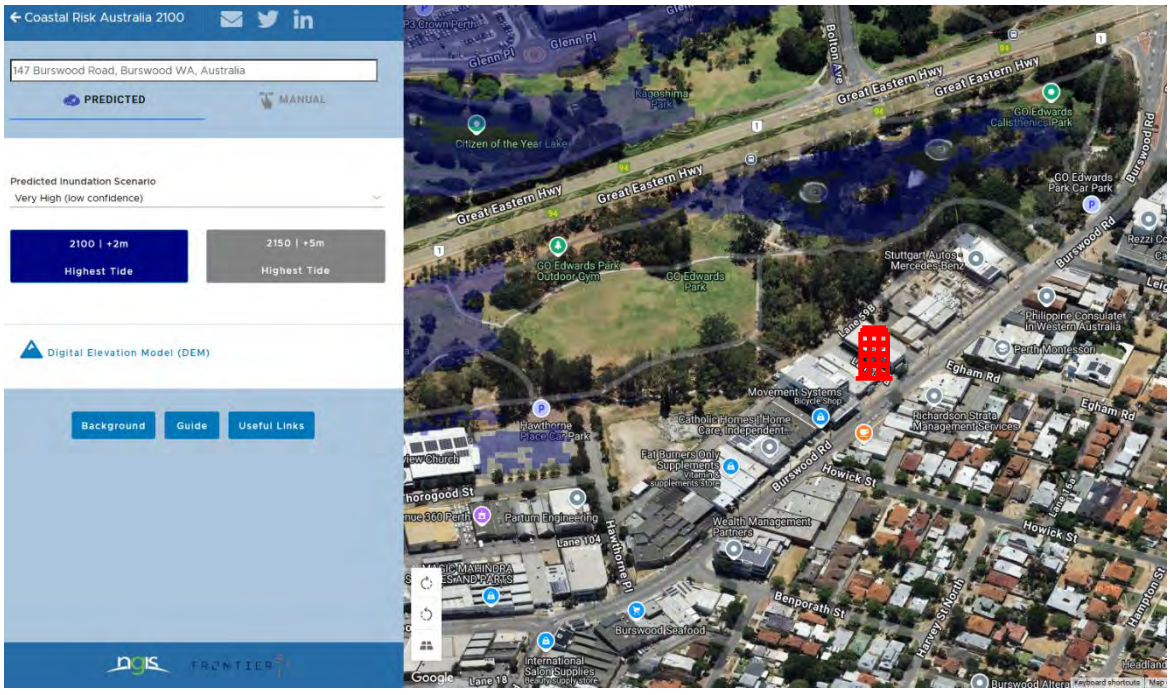
The Resilient category of credits highlight the need for projects to be ready for the imminent impacts of climate change and to provide a level of support to the surrounding community. Shocks to power infrastructure, ongoing weather pattern adjustment and the urban heat island effect are considered within the category.

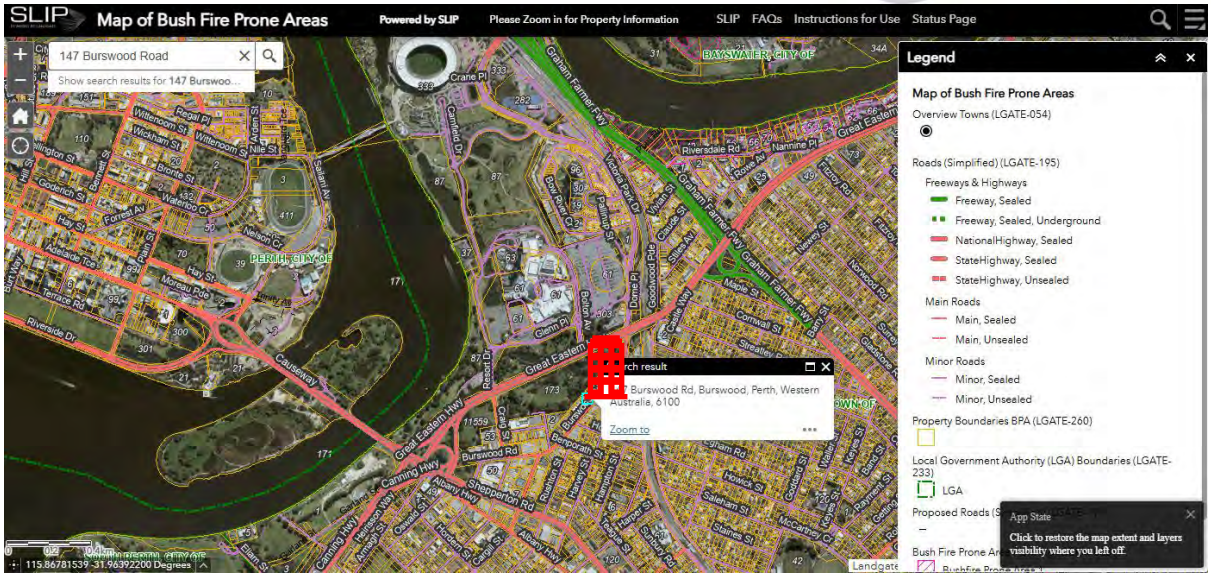
4.1 Climate Change Resilience

FCDS have undertaken a base review of the project and the potential likely impacts of climate change on the site, based on the following likely impacts of climate change in South West WA – RCP 8.5 to 2090:

Variable	Current	Predicted	Expected Change	Possible Range
Annual Average Temperature (°C)	25.8 °C	29.3 °C	+3.5°C	28.4 – 30°C
Number of days over 35°C	28	63	+35	50-72
Annual Average Rainfall (mm)	851.7mm	698mm	-18%	536 – 809mm
Summer	40.5mm	38.5mm	-5%	27.9 – 55.1mm
Autumn	144.1mm	135.4mm	-6%	98 – 162.8mm
Winter	398.2mm	282.7mm	-29%	223 – 338.5mm
Spring	147.5mm	94.4mm	-36%	60.5 – 126.8mm
Annual Average Potential Evaporation	1800mm	1836mm	+2%	1818-1872mm
Annual Relative Humidity	55%	54.4%	-0.6%	53.7 – 55%

The site not considered susceptible to flooding under climate change scenarios:





The site is low risk of bushfire.

4.2 Climate Change Risk Management

Following the base risk review above, the design team have included the following features to mitigate risks and provide an improved outcome for occupants and the local community:

Climate Change Impact	Risk	Proposed Response
Increased temperatures lead to increased bushfire risk and intensity.	Low due to current classification of site.	Consider provision of air filtration on air conditioning systems.
Rising sea levels and increased flood risk.	Very low.	Avoid construction below ground level. Ensure structure can adapt to changing water levels.
Reduced rainfall	Increasing requirement for irrigation, increased cost of scheme water.	Utilise smart irrigation, including moisture detection and prioritise drought tolerant planting. Utilise native grass for turfed areas.
Increased temperatures lead to increased reliance on air conditioning.	Building is unable to provide comfortable environment for extended periods.	Provide high efficiency air conditioning systems with automatic controls. Upgrade building envelope in excess of BCA minimum requirements.
Increased temperatures lead to increased power demand.	Operating cost increases as electrical prices increase. Power security becomes questionable.	Good control systems and energy efficient design. Installation of solar photovoltaics for renewable generation.

4.3 Operations Resilience

Whilst the project team have identified no significant risks in terms of operation under the loss of power, the design includes features which improve operational resilience under major shocks to electrical infrastructure including:

- Strong solar passive design
- Building envelope upgrade above minimum compliance
- Onsite renewable generation

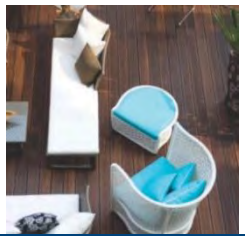
4.4 Grid Resilience:

The building will be designed to reduce its electricity peak demand by 10% of the annual peak electricity demand for at least a one-hour period through a variety of features, some of which include:

- Improved building envelope
- Outside air management and control
- High efficiency systems
- On site renewable generation and battery.

4.5 Heat Resilience

The project should include the selection of light colours to external finishes as well as shaded area (from fixed building shading and planting) and landscape integrated into the site to minimise the impacts of urban heat island on the site. The following table shows the recommended colour palettes with respect colours and solar absorbance:

Usage	Initial SRI	3 Year SRI	Sample Product
Metal Roof > 15° Pitch			
Hardscape	>34	>39	Bamboo (35-48)  Grey Limestone (54) 
Metal Roof < 15° Pitch	>82	>64	  White Concrete (86)

5. Positive Design Features

The Positive category refers to design elements which contribute positively to the environment. Buildings must actively reduce their harm, but also act as a restorative force for good in order to achieve credits. The category assesses energy use, energy source, water consumption and refrigerant emissions, aligning with the National Standard for carbon neutral assessment and certification (Climate Active).

Material	PER embodied energy MJ/kg
Air dried sawn hardwood	0.5
Stabilised earth	0.7
Concrete blocks	1.5
In situ concrete	1.9
Precast tilt-up concrete	1.9
Kiln dried sawn hardwood	2
Precast steam-cured concrete	2
Clay bricks	2.5
Gypsum plaster	2.9
Kiln dried sawn softwood	3.4
Autoclaved aerated concrete (AAC)	3.6
Plasterboard	4.4
Fibre cement	4.8
Cement	5.6
Local dimensioned granite	5.9
Particleboard	8
Plywood	10.4
Glue-laminated timber	11
Laminated veneer lumber	11
MDF (medium density fibreboard)	11.3
Glass	12.7
Imported Dimensioned Granite	13.9
Hardboard	24.2
Galvanised steel	38
Acrylic paint	61.5
PVC (polyvinyl chloride)	80
Plastics — general	90
Copper	100
Synthetic rubber	110
Aluminium	170

5.1 Upfront Carbon Emissions

The design team will target material selections which reduce the embodied energy by a minimum of 10%. Features to support this include the use of natural finishes, cement replacement, sustainably sourced steel and structural efficiency as part of the proposed solution.

5.2 Energy Use

The design team will ensure low energy use by improving performance against BCA Section J minimum, across building envelope, air conditioning and ventilation systems and lighting. Overall performance for the envelope is expected to be >10% improvement and – including services and renewable generation - >30%.

5.3 Energy Source

Ideally, the design will omit all fossil fuels from site.

5.4 Water Use

The development is targeting a minimum 15% reduction in water consumption against benchmarks, including the provision of low flow fixtures are being provided for sanitary uses in accordance with the table below:

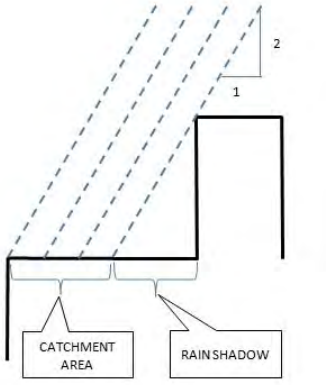
Fixture Type	Target WELS rating	Maximum Flow Allowable
Taps	5 stars	4.5-6 L/min
Urinals	5 stars	1.0 L / Flush + Smart demand flush device
Toilets	4 stars	<3.5 L average flush, <4.7L full flush <3.2 half flush
Showers	3 stars	6.0 – 7.5 L/min
Clothes Washing Machines	4 stars	
Dishwashers	5 stars	

5.5 Overall Footprint Reduction

The design team are confident that the proposed design features will result in a net life cycle emissions reduction of at least 30% if assessed by an LCA practitioner.

5.6 Rainwater Reuse

Rainfall reuse generally does not provide good economic returns in Perth. The highly seasonal nature of our rainfall along with potential health risks associated with long-term storage of untreated water makes rainfall reuse outside of domestic applications highly problematic and, generally, uneconomic.



Rainwater can be captured to improve the viability of landscaped areas which would otherwise be in 'rain shadows' from built form or which have relatively limited deep soil for water retention.

For this development, the design team reviewed the potential for small systems serving toilet flushing, but decided against it due to cost and risk of contamination.

6. Places Design Features

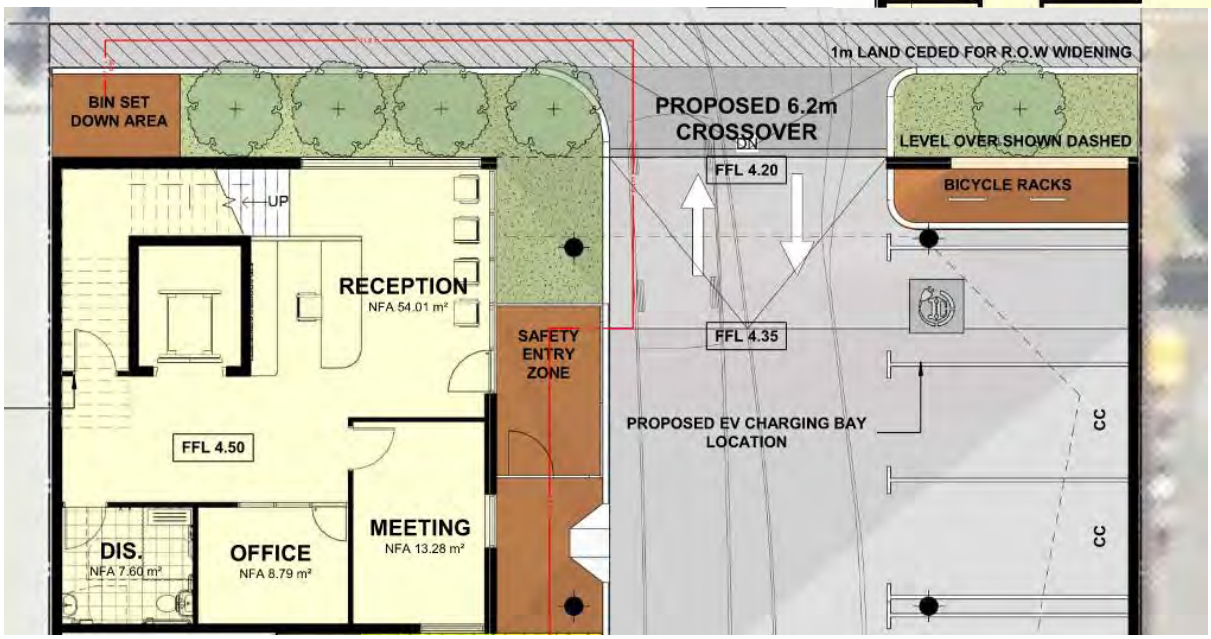
The places category reflect outcomes that are linked to the location and nature of the development. Design features which reduce the impacts of transport – on the environment and occupant health – are rewarded with credits. In addition, proximity of the development to local amenity and public transport which can promote walking and reduce reliance on vehicles is also recognised.



Within the site, the category considers the provision of communal spaces and their potential beneficial impacts on the occupants. Externally, project teams are encouraged to engage with, consult and justify their design to the local community as well as their shareholders.

6.1 Active Transport

The design currently includes end of trip facilities for staff of the child care, with bike parking, showers and change facilities.



6.2 Sustainable Transport

Green Star Buildings requires project teams to make provision for car sharing as well as EV Parking and future charging.

Considering the location of the development, strong consideration has been given to EV charging facilities, including potential for paid fast charging, the design will comply with BCA 2022 as a minimum for EV provisions:

BCA 2022 Requirements – Part J9D4	
A carpark associated with a Class 2, 3, 5, 6, 7b, 8 or 9 building must be provided with electrical distribution boards dedicated to electric vehicle charging—	
in accordance with Table J9D4 in each storey of the carpark; and labelled to indicate use for electric vehicle charging equipment.	~1 DB
Electrical distribution boards dedicated to serving electric vehicle charging in a carpark must—	
be fitted with a charging control system with the ability to manage and schedule charging of electric vehicles in response to total building demand; and	
when associated with a Class 2 building, have capacity for each circuit to support an electric vehicle charger able to deliver a minimum of 12 kWh from 11:00 pm to 7:00 am daily; and	NA
when associated with a Class 5 to 9 building, have capacity for each circuit to support an electric vehicle charger able to deliver a minimum of 12 kWh from 9:00 am to 5:00 pm daily; and	
when associated with a Class 3 building, have capacity for each circuit to support an electric vehicle charger able to deliver a minimum of 48 kWh from 11:00 pm to 7:00 am daily; and	NA
be sized to support the future installation of a 7 kW (32 A) type 2 electric vehicle charger in— 100% of the car parking spaces associated with a Class 2 building; or 10% of car parking spaces associated with a Class 5 or 6 building; or 20% of car parking spaces associated with a Class 3, 7b, 8 or 9 building; and	One provided initially.
contain space of at least 36 mm width of DIN rail per outgoing circuit for individual sub-circuit electricity metering to record electricity use of electric vehicle charging equipment; and	
be labelled to indicate the use of the space required above is for the future installation of metering equipment.	

The Green Star thresholds are slightly different:

Attribute	Green Star Target	Design Requirement	Met?
Ready to charge EV Parking	5% of all parking spaces	1 Bay	Yes
Future car share parking spaces with potential for EV	Additional 5% of bays	1 Bays nominated for car share	Future Provision
Load management and infrastructure	Cater for 25% of all car parking spaces.		Met
Cater for 7kW and 22kW charging points	Design team to confirm mix		Met
Cable paths for future provision	Potential to provide charging to all bays		

Summarising, the design team should be providing:

- One electrical DB covering parking bays on the north west and south side of the site
- Electrical infrastructure to provide charging control in relation to overall site demand
- At least 12kWhrs power provision between 9AM and 5PM for each charging bay
- Potential to delivery 7kW (32A type 2) electric vehicle charger to at least 20% of all bays
- Space for electrical metering for each car charging circuit – including future circuits
- Labelling for all EV charging infrastructure, including future space provision.

The design team will also provide a sustainable transport plan which addresses:

Plan Element	Comment
Typical mode share of development, considering location and type	Staff parking, short term drop off, commercial tenancies. Most staff will need to park.
Target mode share, prioritising active and public transport.	Improve pedestrian and cyclist access.
Design features to facilitate mode share shift away from private use:	
Car Pool	Community noticeboard and engagement
Electric Vehicles	EV charging to BCA 2022
Active Transport	Staff EoT and visible bike parking.
Drop Off Points	Burswood Road or Right of Way
Potential future projects and upgrades, including delivery timeline	Future extension of EV systems.
Roles and Responsibilities during operation:	
Implementation:	Tenant
Monitoring:	Tenant
Audit and Review:	Tenant

6.3 Contribution to Place, Culture Heritage and Identity

The design provides an important public service supporting the local community.

7. People Design Features

The People category of credits provides an increased emphasis on social sustainability outcomes within the Green Star system. Projects are required to consider gender inclusivity and provide staff support around issues such as mental and physical health as part of their impact on the people building the project as well as the people who will use it long term.

The category also rewards projects that deliver strong outcomes for Indigenous or disadvantaged and under-represented social groups.

7.1 Minimum Requirements

The main contractor will be required to provide gender specific bathrooms and PPE on site and provide policies and training on discrimination, racism, bullying, drug and alcohol awareness and mental health. This will include introducing programs and solutions to address at least five current health issues such as suicide prevention, healthy eating and depression.

7.2 Needs Analysis

The contractor will be required to complete a needs analysis of site workers and contractors to inform the programs and policies implemented.

7.3 Accessible Navigation

The design team will ensure the building's design and construction must be able to be navigated and enjoyed by stakeholders of diverse ages, genders, and abilities (for example physical, sight, sound, mind, spectrum). The design will provide equal access to the building, diverse wayfinding and inclusive spaces.

8. Nature Design Features

The Nature category is based on providing design solutions which prioritise and restore the natural environment around prospective developments. Features consider biodiversity, previous site usage, site emissions and waterway protection. Projects are requried to demonstrate best practice performance across the range of local impact areas considered.

8.1 Minimum Requirements

- The site is not an old growth forest, prime agricultural land or within 100m of a nationally significant wetland.
- The external lighting will comply with AS 4282 – Control of the obtrusive effects of Outdoor Lighting
- No external light fitting will have an Upward Light Output Ratio (ULOR) of more than 5%.

8.2 Ecological Value

The current and future ecological value of the site will be retained through the use of primarily native planting, with green spaces across the site.

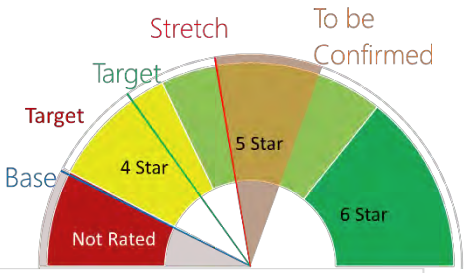
8.3 Stormwater

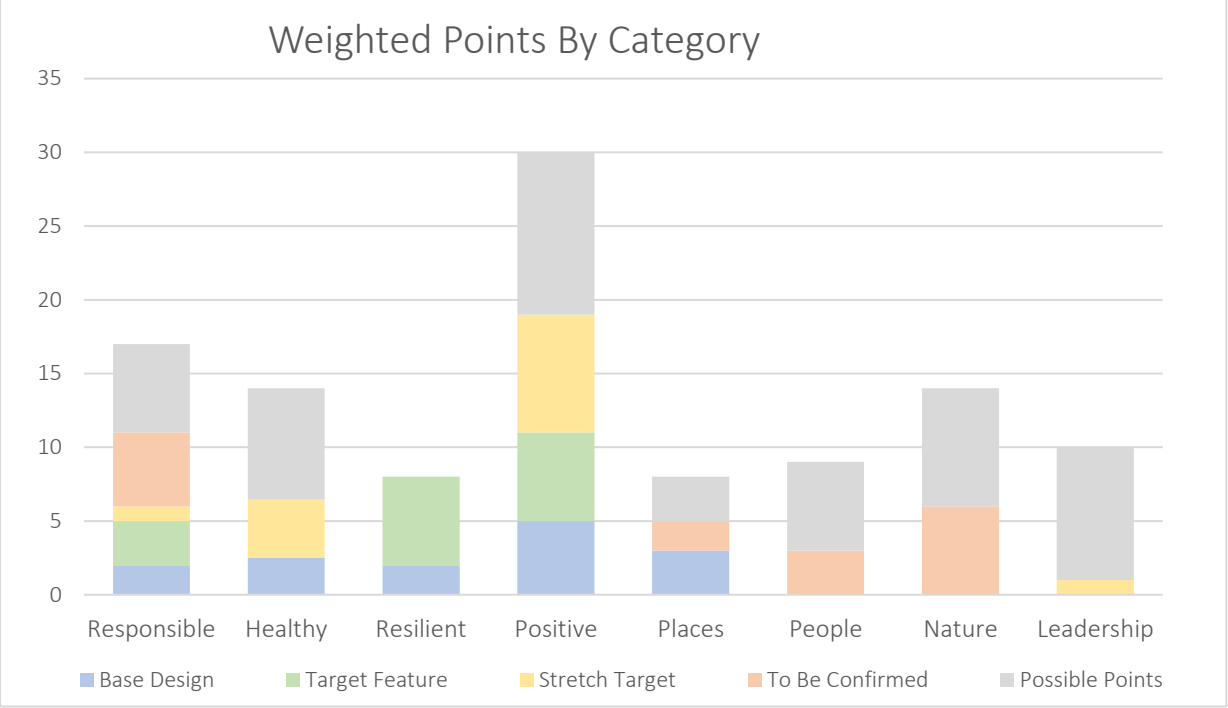
The design is to infiltrate a proportion of stormwater into local ground water, aiming to minimum outflow and achieve pollution reduction matching the performance below:

Pollutant	Contaminant Reduction
Total Suspended Solids (TSS)	90%
Gross Pollutants	95%
Total Nitrogen	60%
Total Phosphorus	70%

9. Assessment Review

FCDS assessment of the current project documentation indicates a minimum score of just under 15 points (4 Star) and an expected score of 29.5 points ~4.75 Star level.





Key features to be included to support a best practice outcome include:

- 20kW Peak Output Solar Array (nominal offset of more than 60 tonnes of $CO_{2(e)}$ per annum)
- Onsite battery to improve renewable energy utilisation
- Best Practice Operation and Maintenance Manuals
- Avoidance of fossil fuels on site
- Potential for nature plan
- Future flexible design change
- Ducted outside air provision to occupied spaces, with dedicated exhaust systems to manage indoor air quality.
- High efficiency services and appliances
- High performance building envelope – targeting 20% improvement over BCA minimum

9.1 Items for Close Out

The following elements are required to be addressed as part of the ongoing design phase:

- Meter data provision to occupants
- Potential for additional solar on site, available project budget / client appetite for installation as part of this scope to be confirmed
- Sustainable building management practices
- Finishes and furniture selections
- Building sustainability committee and / or building tuning interfaces

Appendix A – Design Assumptions and Actions

In completing the initial assessment, FCDS have used the following elements as the basis for our predicted costs and design team actions:

Building Owner:

FCDS have assumed the Builder Owner will Create a formal building policy / operational intent including:

- Commitment to maintaining common area finishes for a minimum of 10 years, barring repair for minor wear and tear.
- Commitment to 12 months of building tuning, including monitoring energy and water consumption in operation and targeting performance in keeping with design intent.
    - Tuning to involve FCDS, the main contractor and a facilities management representative.
- Commitment to achieving a NABERS Energy and NABERS Water rating in operation,
- Ensure all tenancies undertake design review by design team prior to commencement of fit-out
- Development and implementation of green procurement, groundskeeping and cleaning plans and policies on site

FCDS have also assumed the Building Owner will appoint a qualified professional to review ongoing ESD performance throughout the design and construction phases.

Main Contractor:

FCDS have assumed the main contractor will:

- Provide high quality and electronic operations and maintenance manuals for user and building management.
- Maintain ISO 14001 EMS,
- Provide a site-specific Construction Management Plan
- Provide a site-specific Waste Management Plan to divert >90% of waste, by mass, from landfill.
- Provide high quality staff and sub-contractor support, including running programmes through the duration of construction to address three distinct issues with workplace programs and policies which go beyond minimum OH&S requirements and extend to wellbeing promotion, including both mental and physical health support services.
- Provide general training and education on sustainable design outcomes.
- Undertake, and facilitate sub-contractors undertaking, a thorough review of design for servicing and maintainability issues prior to construction. The design team are to assist in rectifying issues where found.

Architectural:

- Designer will participate in a design review with main contractor and redocument to address major servicing or maintainability issues.

- Designer will complete a tenancy design review for all proposed tenancies, including consideration of coordination with base building services and integration with land-lord requirements
- Design will consider the implications of climate change by ensuring all building envelope elements exceed BCA minimum requirements by at least 10%.
- Design will include a waste store sized sufficiently to capture at least three waste streams
- The design will use low toxicity products for adhesives, sealants, paints, carpets, composite wood products.
- The design will include electric induction cook tops and electric, heat pump hot water systems
- The design will include highly durable (>10 year expected life) products for common areas

Mechanical:

FCDS have assumed the following as the initial basis for the mechanical systems design brief:

- Air cooled DX style plant.
- Designer will participate in a design review with main contractor and redocument to address major servicing or maintainability issues.
- Designer will complete a tenancy design review for all proposed tenancies, including consideration of coordination with base building services and integration with land-lord requirements
- Provision of exhaust to limit exposure of occupied spaces to pollutants, including car parks and kitchens.

Electrical – Renewable Energy, Lighting and Power:

FCDS have assumed the following as the initial basis for the electrical systems design brief:

- Designer will participate in a design review with main contractor and redocument to address major servicing or maintainability issues.
- Designer will complete a tenancy design review for all proposed tenancies, including consideration of coordination with base building services and integration with land-lord requirements
    - High quality basic internal lighting provision, including:
    - CRI > 80 and < 3 Macadam Ellipses for residential spaces.
    - Diffusers on all lights to prevent occupants from having direct line of sight to any bare light source.
    - Task lighting for work surfaces and vanity basins
- Achieve a minimum 10% improvement over BCA requirements for energy efficiency.
- Power points in living areas and bedrooms to facilitate reading lamps
- Sophisticated building metering, monitoring and billing system, including electricity and water meters to each separate dwelling, with separate metering for common area water and power supplies. Include a utility check meter directly downstream of incoming supply.

Hydraulic:

FCDS have assumed the following as the initial basis for the hydraulic design brief:

- Designer will participate in a design review with main contractor and redocument to address major servicing or maintainability issues.
- Designer will complete a tenancy design review for all proposed tenancies, including consideration of coordination with base building services and integration with land-lord requirements
- Individual dwelling electric heat pump hot water systems. Achieve a minimum 10% improvement over BCA requirements for energy efficiency.
- Embedded meter network, including:
    - Metering of cold water to each individual dwelling and common area.
    - Utility check meter and all immediate downstream uses to permit leak detection and self-reconciliation

Civil / Structural:

FCDS have assumed that stormwater will generally be retained on site, with limited treatment provided. Water will generally be infiltrated to local ground water via storm-cells up to a 1:100 year ARI, with emergency flow overland to council systems.

Full Circle
Design Services

Planning | Design | Delivery | Performance

www.fullcircledesign.com.au

Please Contact: Graham Agar

0412475819

Graham.agar@fcds.com.au

Project Name	147 Burswood Road		
Project Number	2025_026		
Version	Buildings V1.1		
Target Rating	4 Stars	15 Points	
Buffer	5%	**Formal Certification?**	Self Assessed
Client	Meyer Shircore		
Local Council	Town of Victoria Park		
Contract Value	~ <$10M		
Building Owner	Elven Property		
Building Tenant	Childcare + Commercial		

ESD Consultant	FCDS	**GFA (m²)**	821
Project Manager	Rowe	**Site Area (m²)**	1,186
Architect	MSA	**Type**	Commercial
Quantity Surveyor	QS	**UFA (m2)**	666.7
ICA	ICA	**Car Bays**	26
Building Surveyor	Surveyor	**Staff**	25

Project Team		
Main Contractor	Builder / Main Contractor	
Discipline	**Consultant**	**Contractor**
Mechanical	Mechanical	Mechanical
Electrical	Electrical	Electrical
Fire	Fire	Fire Contractor
Hydraulic	Hydraulic	Plumber
Civil	Civil	Civil
Structural	Structural	Structure
Façade	Facade	Façade
Lift	Lift	Lift
Landscape	Lanscape	Landscape
Specialists		
Acoustic Engineer	Acoustic	
Waste Consultant	Waste	
Transport Planner	Transport	
Life Cycle Modeller	FCDS	
Climate Change	FCDS	

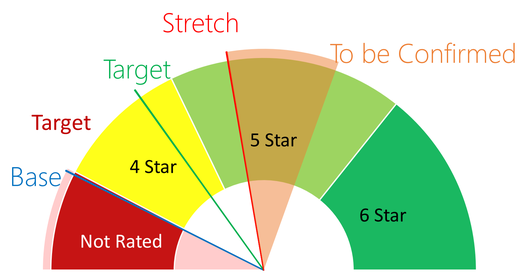
Green Star Credit List

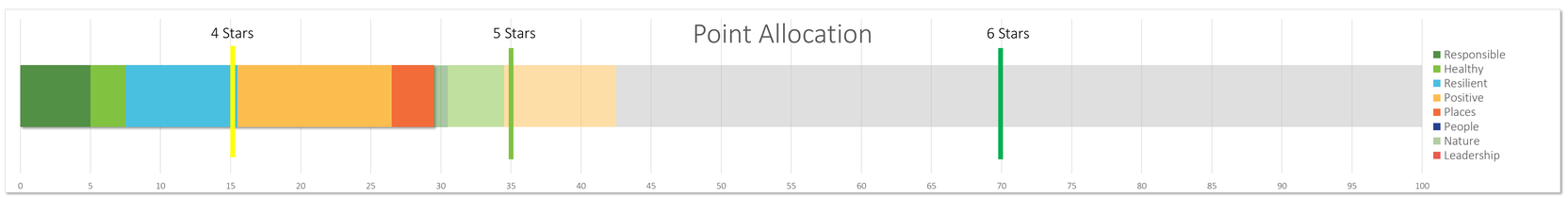
This is FCDS self-assessment of the proposed redevelopment of 147 Burswood Road. This scorecard is in no way equivalent to a formal review or certification by the Green Building Council. The scorecard is presented as a means to demonstrate how the design team intends to meet their target of 'Best Practice' sustainable design.
Credits are classified as follows:
Base Design refers to features inherent in the current planning.
Target Feature are design inclusions which are intended to be delivered as part of the project delivery.
Stretch Targets are features which could be attempted by the project team, but are currently outside of intended approoach. These elements would be used to replace other features if requied to meet target.

Revision	Date	Reason for Issue
A	28th April 2025	Initial Review
B	4th May 2025	DA Submission

Category	Available Points	Base Design	Target Feature	Stretch Target	To Be Confirmed	Not Achieved	Total Cost
Responsible	17	2	3	1	5	6	$36,000
Healthy	14	3	0	4	0	8	$31,400
Resilient	8	2	6	0	0	0	$22,100
Positive	30	5	6	8	0	11	$41,500
Places	8	3	0	0	2	3	$10,000
People	9	0	0	0	3	6	$0
Nature	14	0	0	0	6	8	$0
Leadership	10	0	0	1	0	9	$0
Sector Specific		0	0	0	0		$0
	110	15	15	14	16	51	$141,000
		14.5	29.5	43.5	59.5		

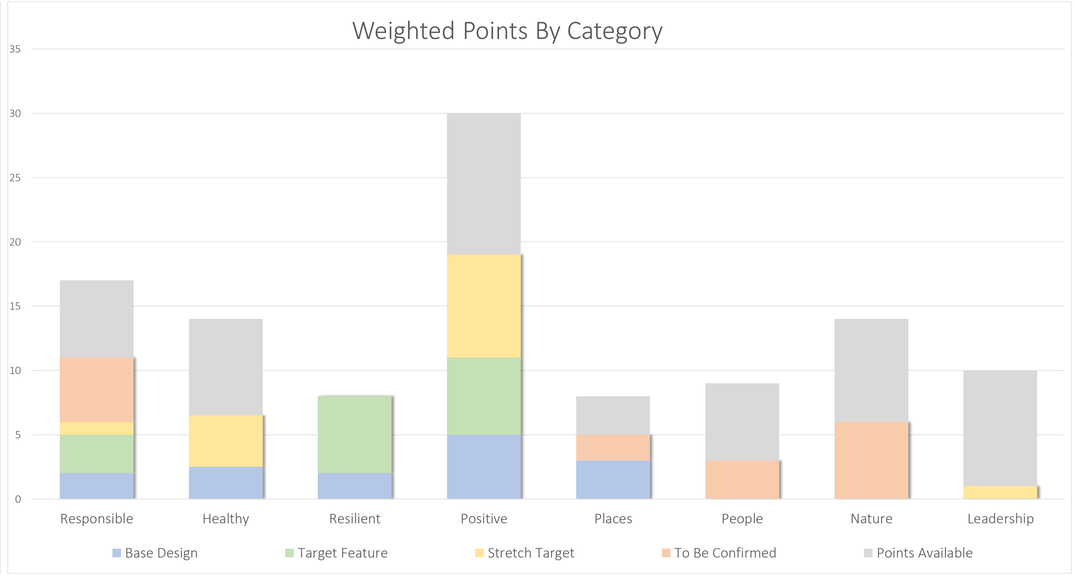
Rating Achieved





Credit	Cost	Cumulative Points	Cumulative Cost
R17.1 - Comprehensive Risk Assessment	$0	17	$10,000
R2.4 - Construction and Demolition Waste Diversion - Exceptional	$0	18	$10,000
R9.1 - Responsible Finishes	$0	19	$10,000
R9.2 - Responsible Finishes - Exceptional	$0	20	$10,000
R16.2 - Climate Change Risk and Adaptation Assessment	$0	21	$10,000
P22.2 - Net Zero Path	$15,000	24	$25,000
P22.3 - Emissions Reduction	$15,000	27	$40,000
R20.1 - Active Generation and Storage Systems	$22,100	30	$62,100
H11.1 - Minimum lighting comfort	$700	30	$62,800
H11.2 - Glare	$700	30	$63,500
R3.2 - Services and Maintainability Review	$2,500	30	$66,000
R3.4 - Building Systems Tuning	$6,000	30	$72,000
H10.1 - Provision of Outdoor Air	$10,000	30	$82,000
R3.3 - Building Commissioning	$12,500	30	$94,500
M41.1 - Net Zero	*$0*	*31*	*$94,500*
P23.2 - 100% Renewable Electricity	*$1,750*	*34*	*$96,250*
P23.3 - 100% Renewable Energy	*$1,750*	*37*	*$98,000*
P24.1 - Net Zero Path	*$8,000*	*39*	*$106,000*
H13.4 - On Site Toxicity Testing	*$10,000*	*41*	*$116,000*
H12.3 - Impact Noise Transfer	*$5,000*	*42*	*$121,000*
H12.4 - Reverberation	*$5,000*	*43*	*$126,000*
R3.9 - Soft Landings Approach	*$15,000*	*44*	*$141,000*





Full Circle Design Services

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Responsible	R1.1	Industry Development	The development facilitates industry transformation through partnership, collaboration and data sharing	Green Star Accredited Professional	The building owner or developer appoints a Green Star Accredited Professional, discloses the cost of sustainable building practices to the GBCA, and markets the building's sustainability achievements.	Appoint a GSAP as part of the project team.	FCDS	1	No		1					The design team will include an ESD professional	
	R1.2			Financial Transparency		The project team must complete, and include in the submission, the Green Star Financial Transparency Disclosure Template. The template assists the project team to submit the cost of sustainable building practices of the project including design, construction and documentation to the GBCA	FCDS		No							Cost analysis will be undertaken and optimised for the site.	
	R1.3			Marketing Excellence		* Complete Green Star Case Study * Detail Sustainability Achievements to Stakeholders * Display Green Star Certification Prominently	FCDS, MSA, Elven Property & Rowe		No							The design will provide information on ESD features for the tenants.	
	R2.1	Responsible Construction	The builder's construction practices promote the reduction of impacts and opportunities for improved environmental outcomes.	Environmental Management System	The builder's construction practices reduce impacts and promote opportunities for improved environmental and social outcomes.	The builder or head contractor (responsible party) must have a formalised systematic and methodical approach to planning, implementing and auditing in place during construction. From the start of construction the builder or head contractor must implement an Environmental Management Plan (EMP) which must be project specific and cover the entire project scope including all construction activities.	Builder / Main Contractor	0	Yes		Met					Contractors will be required to have a documented approach to sustainable construction	
	R2.2			Construction and Demolition Waste Diversion		Projects must divert at least 80% of construction and demolition waste from landfill.	Builder / Main Contractor	0	Yes		Met					Waste to be colelcted and sorted off site.	
	R2.3			ESD Training		The head contractor must provide the following training to 95% of all contractors and subcontractors present on site for at least three days.	Builder / Main Contractor	0	Yes		Met					Training material will be provided by project GSAP.	
	R2.4			Construction and Demolition Waste Diversion - Exceptional		Projects must divert at least 90% of construction and demolition waste from landfill.	Builder / Main Contractor	1	No			1				Contractors generally achieve this in the metro area. Performance will be specified by GSAP.	$0
	R3.1	Verification and Handover	The building has been optimised and handed over to deliver a high level of performance in operation.	Environmental Performance Targets	The building has been commissioned and will be tuned. The building was set up for optimum ongoing management due to its appropriate metering and monitoring systems. The project team create and deliver operations and maintenance information to the facilities management team at the time of handover. Information is available to building users on how to best use the building	Set environmental performance targets prior to construction and document them within an OPR (Owners Project Requirements)	FCDS	0	Yes		Met					Performance targets set as part of DA submission.	
	R3.2			Services and Maintainability Review		Complete a services and maintainability review prior to construction.	ICA	0	Yes			Target				Design review will be carried out by project team and GSAP	$2,500
	R3.3			Building Commissioning		Commission the building in accordance with recognised best practice international standards, including a building envelope test. A specific building envelope pressure test plan and schematic are to be developed.	ICA & Mechanical	0	Yes			Target				Child Care envelope to be tested as part of PC process.	$12,500
	R3.4			Building Systems Tuning		Engage a building tuning service provider and tune the building for at least 12 months.	Elven Property, FCDS & Rowe	0	Yes			Target				Ongoing building tuning and optimisation to be carried out with tenant.	$6,000
	R3.5			Metering and Monitoring		Provide accessible energy and water metering for all common uses, major uses, and major sources, connected to a monitoring system capable of capturing and processing the data produced by the meter	FCDS, Mechanical, Hydraulic & Electrical	0	Yes		Met					Utility metering will meet this requirement due to small size of project.	
	R3.6			Operation and Maintenance Information		Provide operations and maintenance information for all nominated building systems to the building owner (or designated representative).	FCDS, Mechanical, Hydraulic & Electrical	0	Yes		Met					O+M documentation will be provided.	
	R3.7			Building Log Book		Develop a building log book to present to the building owner (or designated representative) before practical completion of the project	FCDS, Mechanical, Hydraulic & Electrical	0	Yes		Met					Project GSAP will document relevant information for building occupamts.	
	R3.8			Building User Information		All building user information must be available to the building owner and facilities management team at the time of practical completion.	Builder / Main Contractor, FCDS, Mechanical, Hydraulic & Electrical	0	Yes		Met					BUG will be produced by GSAP prior to handover.	
	R3.9			Soft Landings Approach	An independent level of verification is provided to the commissioning and tuning activities through the involvement of an independent commissioning agent, or through a soft landings approach that involves the future facilities management team. For large projects (>$20M) both must occur.	Deliver Soft Landings Approach for the project, including involving the FM team and/or Owners Representative across commissioning and handover, development of the Operations and Maintenance Manuals, Sign off on Operations and Maintenance Manuals and be trained before handover.	Elven Property, ICA & Rowe	1	No				1			Project is too small for significant value from an ICA.	$15,000
	R3.10			Independent Commissioning Agent		Appoint an independent commissioning agent (ICA) to act an advocate for and reports directly to the project owner.	Elven Property, ICA & Rowe		No								

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Responsible	R4.1	Operational Waste	Operational waste can be separated and recovered in a safe and easy manner.	Separation of Waste Streams	The project team must demonstrate the building is designed to allow effective management of operational waste by: • Separating waste streams; • Providing a dedicated and adequately sized waste storage area; and • Ensuring easy and safe access to waste storage areas for both occupants and waste collection contractors.	The building must provide labelled and accessible bins or storage containers to building occupants to enable them to separate their waste. At least four waste streams are to be collected, each at >1% of annual operational waste, with any waste stream over 5% (other than food) of the annual volume provided with dedicated collection points.	Elven Property, Waste & MSA	0	Yes		Met					Design includes bin store at ground level offering ample area for waste segregation. Bin provision within tenancy part of fitout design.	
	R4.2			Dedicated Waste Storage		A dedicated area, or areas, for the storage and collection of the applicable waste streams must be provided. The storage area must be sized to accommodate all bins or containers, for all applicable waste streams, for at least one collection cycle.	Waste & MSA	0	Yes		Met					Waste store at ground level is provided for all tenants.	
	R4.3			Access to Waste Storage Area		The storage area(s) must have easy and safe access by collection vehicles and cleaning staff	Elven Property, Waste & MSA	0	Yes		Met					All users have safe and convenient access to waste store.	
	R4.4			Qualified Waste Auditor		A waste specialist and/or contractor must sign-off on the designs to confirm they are adequately sized and located for the safe and convenient storage and collection of the waste streams identified	Elven Property, Waste	0	Yes		Met					Architectural design considered to meet the intent of this element.	
	R5.1	Responsible Procurement	The procurement process for all products, materials, and services for the building's design and construction follows best practice environmental and social principles.	Risk and Opportunity Assessment	The building's design and construction procurement process follows ISO 20400 Sustainable Procurement - Guidance and at least one identified supply chain risk and opportunity is addressed.	Undertake a risk and opportunities assessment of its supply chain to identify environmental and social risks and opportunities **and**	Builder / Main Contractor, FCDS & MSA	1	No		1					Project team will select key products sustainably to meet Green Star targets.	
	R5.2			Responsible Procurement Plan		Develop and implement a plan to mitigate and manage identified risks and drive implementation of identified opportunities.	Builder / Main Contractor, FCDS & MSA		No								
	R6.1	Responsible Structure	The building's structure is comprised of responsibly manufactured products.	Responsible Structure	50% of all structural components (by cost) meet a Responsible Products Value score of at least 10	• Industry specific environmental product declarations (EPD) - 2 Points • Product specific environmental product declarations (EPD) - 4 Points • ISO14001 certification - 3 Points • Reused Product - 15 Points • FSC Certified - 10 Points • Best Practice PVC Certified - 5 Points • Living Product Challenge • Declare	Structural & MSA	3	No					3		Product specifications to be reviewed with contractor.	
	R6.2			Responsible Structure - Exceptional	In addition, one of the following is met: • 10% of all products in the structure (by cost) meet a Responsible Products Value score of at least 15; OR • 80% of all products in the structure (by cost) have an average Responsible Products Value score of at least 10.		Structural & MSA	2	No								
	R7.1	Responsible Envelope	The building's envelope is comprised of responsibly manufactured products.	Responsible Envelope	30% of all building envelope components (by cost) meet a Responsible Products Value score of at least 10.	• Industry specific environmental product declarations (EPD) - 2 Points • Product specific environmental product declarations (EPD) - 4 Points • ISO14001 certification - 3 Points • Reused Product - 15 Points • FSC Certified - 10 Points • Best Practice PVC Certified - 5 Points	Structural, Facade & MSA	2	No					2		Product specifications to be reviewed with contractor.	
	R7.2			Responsible Envelope - Exceptional	In addition, one of the following is met: • 10% of all products in building envelope (by cost) meet a Responsible Products Value score of at least 15. OR • 60% of all products in the building envelope (by cost) have an average Responsible Products Value score of at least 10.		Structural, Facade & MSA	2	No								
	R8.1	Responsible Systems	The building's mechanical, hydraulic, transportation and electrical systems are comprised of responsibly manufactured products.	Responsible Systems	20% of all active building systems (by cost) meet a Responsible Products Value score of at least 6.	• Industry specific environmental product declarations (EPD) - 2 Points • Product specific environmental product declarations (EPD) - 4 Points • ISO14001 certification - 3 Points • Reused Product - 15 Points • FSC Certified - 10 Points • Best Practice PVC Certified - 5 Points • Climate Active Carbon Neutral Certification	Mechanical, Electrical, Fire, Hydraulic, Civil & Lift	1	No							Credit not likely to be achieved	
	R8.2			Responsible Systems - Exceptional	In addition, one of the following is met: • 5% of all active building systems (by cost) meet a Responsible Products Value score of at least 11. OR • 35% of all active building systems (by cost) have an average Responsible Products Value score of at least 6.		Mechanical, Electrical, Fire, Hydraulic, Civil & Lift	1	No							Additional credit not considered likely.	
	R9.1	Responsible Finishes	The building's internal finishes (flooring, plasterboard, paints, ceilings, partitions, doors, internal windows etc.) are comprised of responsibly manufactured products and materials.	Responsible Finishes	40% of all internal building finishes (by area) meet a Responsible Products Value score of at least 7.	• Industry specific environmental product declarations (EPD) - 2 Points • Product specific environmental product declarations (EPD) - 4 Points • ISO14001 certification - 3 Points • Reused Product - 15 Points • FSC Certified - 10 Points • Best Practice PVC Certified - 5 Points	MSA & FCDS	1	No			1					$0
	R9.2			Responsible Finishes - Exceptional	In addition, one of the following is met: • 10% of all internal building finishes (by area) meet a Responsible Products Value score of at least 12. OR • 60% of all internal building finishes (by area) have an average Responsible Products Value score of at least 7.		MSA & FCDS	1	No			1				Finishes selections to be reviewed as design progresses. Compliance is considered likely.	$0

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Healthy	H10.0	Clean Air	Pollutants entering the building are minimised, and a high level of fresh air is provided to ensure levels of indoor pollutants are maintained at acceptable levels.	Ventilation System Attributes	Pollutants entering the building are minimised, and a high level of fresh air is provided to ensure levels of indoor pollutants are maintained at acceptable levels. Compliance is to be demonstrated for > of regularly occupied area	Ventilation systems are to comply with AS 1668.2 2012 and ASHRAE Standard 62.1:2013 for minimum separation between openings, outdoor intakes and sources of pollution. All new and existing ductwork is to be cleaned prior to occupation.	Mechanical	0	Yes		Met					Basic requirement for mechanical design. No issues with this requirement.	
	H10.1			Provision of Outdoor Air		Provide outdoor air to each space in the nominated area at a rate greater than the minimum required by AS 1668.2:2012 by 50% **or** Monitor and control CO_2 levels <800ppm during design occupancy **or** Residential Buildings demonstrate best practice approach to outside air and prevention of mould.	Mechanical	0	Yes			Target				Mechanical design will include additional capacity for occupants to increase outside air rates	$10,000
	H10.2			Exhaust or Elimination of Pollutants		Select and utilise low emissions equipment; printers, stoves, vehicles etc. **and/or** Exhaust sources of pollutants directly to outside and physically separate them from occupants.	Elven Property, Rowe, MSA & Mechanical	0	Yes		Met					Exhaust is provided for spaces with contaminant generation.	
	H10.3			Ventilation System Attributes	The building's ventilation systems allow for easy maintenance, and high levels of outdoor air are provided.	Provide adequate access to both sides of all moisture and debris-catching components for maintenance within the air distribution system **and**	Mechanical	2	No							Credits not targeted due to increase in capital cost	
	H10.3			Provision of Outdoor Air		Provide outdoor air to each space in the nominated area at a rate greater than the minimum required by AS 1668.2:2012 by 100% or Monitor and control CO2 levels <700ppm during design occupancy or Provide 0.04m2 ventilation per apartment + 0.015m2 per habitable room.	Mechanical		No							Credit not targeted due to increased energy requrieemnts.	
	H11.1	Light Quality	The building provides good daylight and its lighting is of high quality.	Minimum lighting comfort	The building provides adequate levels of daylight and good lighting levels suitable for the typical tasks in each space.	• All lighting must be flicker-free; • Light sources must have a minimum Colour Rendering Index (CRI) 85 or higher, in all internal and external applications; • Light sources must meet best practice illuminance levels for each task within each space type • The maintained Illuminance values must achieve a uniformity of no less than that specified in Table 3.2 of AS/NZS 1680.1:2006 • All light sources must have a maximum of 3 MacAdam Ellipses.	Electrical	0	Yes			Target				Electrical consultant to select compliant fittings.	$700
	H11.2			Glare		Glare from light sources must be limited within the nominated area. Bare light sources must be fitted with baffles, louvers, translucent diffusers, ceiling design, or other means **or** Unified Glare Rating (UGR), as estimated from the manufacturers data sheets for a standard room, must not exceed the maximum values listed in Table 8.2 of AS/NZS 1680.1:2006. Where the nature of the tasks, layout and surface reflectance in a space are not known (e.g. shell and core) the lighting system must comply with the Luminaire selection system as detailed in Clause 8.3.4 of AS/NZS 1680.1:2006.	MSA & FCDS	0	Yes			Target				Design includes low UGR for fittings.	$700
	H11.3			Daylight		• Maximise the number of occupants that are in or near daylit areas during their daily activities for all building types; • Ensure regularly occupied spaces are in reasonable proximity to glazed façades, windows or skylights; • Control or mitigates glare in the daylit spaces; • Maximise daylight to spaces that prioritise learning, healing, and living: • Provide building occupants with unrestricted access to daylit indoor common spaces.	MSA & FCDS	0	Yes		Met					Design includes excellent access for natural lighting for occupied spaces.	
	H11.4			Daylight - Credit		For non-residential buildings, at least 40% of the principle averaged across the building must receive high levels of daylight with no less than 20% on any floor or tenancy (whichever is smaller).	MSA & FCDS	2	No		2					Design would be expected to achieve these points. Modelling not required.	
	H11.5			Artificial Lighting	The building provides either or both best practice Artificial Lighting and best practice access to daylight.	• The walls within the field of view of occupants in regularly occupied spaces must have an average surface reflectance value of 0.70 and an average surface illuminance of at least 50% of the horizontal illuminance levels required for task. • Vertical illuminance in workspaces: ensure that 50% of the horizontal task illuminance reaches the average eye height for 90% of primary spaces using vertical illuminance calculation grid.	Electrical	2	No							Credit compliance is considered difficult.	
	H12.1	Acoustic Comfort	The building provides acoustic comfort for building occupants.	Internal Noise Levels	An Acoustic Comfort Strategy is prepared to describe how the building and acoustic design aims to deliver acoustic comfort to the building occupants.	Internal ambient noise levels in the nominated areas must be no greater than the upper range value *and (Schools and Commercial Tenancies) no less than 5 dB below the lower range value* relevant to the activity type in each space as recommended in AS/NZS 2107.	Acoustic, Mechanical & MSA	0	Yes		Met					Acoustic consultant will provide acoustic strategy. Design team to meet AS 2107 noise levels as well as target impact noise transfer and reverberation within occupied space as a stretch target.	
	H12.2			Acoustic Separation	The building is designed and tested to achieve minimum acoustic performance requirements aligned with the Acoustic Comfort Strategy. * Residential - 2 Additional Features * Healthcare - 3 Additional Features * Schools - 3 Additional Features * Tenancies - 3 Additional Features * Shell and Core - 2 Additional Features * Sports - 2 Additional Features * Industrial - Separation Only	Address noise transmission between enclosed spaces within the nominated area either by sound privacy or insulation.	Acoustic & MSA	2	No							Design is expected to provide good noise separation. Onsite performance verification to be specified	
	H12.3			Impact Noise Transfer		Floors above nominated areas or adjacent spaces belonging to different tenancies which share a floor must not exceed dB LnT,w 60 for all non-residential spaces	Acoustic & MSA		No				1			Noise separation between levels is important for project success.	$5,000
	H12.4			Reverberation		The reverberation time in the nominated area must be not exceed the maximum for the intended use recommended in AS/NZS2107. This does not apply for residential spaces.	Acoustic & MSA		No				1			Reverberation time control is critical for educational outcomes.	$5,000

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Healthy	H13.1	Exposure to Toxins	The building's occupants are not directly exposed to toxins in the space they work, play, or live in.	Paints, Adhesives, Sealants and Carpets	The building's paints adhesives, sealants, carpets, and engineered wood products are low or non-toxic. Occupants are not exposed to banned or highly toxic materials in the building.	Use low toxicity paints, adhesives, sealants and floor coverings.	MSA, Mechanical, Electrical, Fire, Hydraulic, Civil & Lift	0	Yes		Met					ESD Specification to confirm performance requirements	
	H13.2			Engineered Wood products		Use low emission formaldehyde composite or engineered wood products	MSA	0	Yes		Met					ESD Specification to confirm performance requirements	
	H13.3			No Lead, Asbestos and PCBs		Undertake comprehensive site survey for Lead, PCB's and asbestos. Take appropriate remediation action where relevant.	Elven Property	0	Yes		Met					No requirement, no existing buildings are being reused.	
	H13.4			On Site Toxicity Testing	On-site tests verify the building has low Volatile Organic Compounds (VOC) and formaldehyde levels.	Undertake performance testing on site at completion to confirm building meets target toxicity levels - TVOC < 0.27 ppm and Formaldehyde < 0.02ppm	FCDS & Elven Property	2	No				2			Performance verification considered a stretch target.	$10,000
	H14.1	Amenity and Comfort	The building provides internal amenities that improve occupant experience of using the building.	Amenity and Comfort	The building has dedicated amenity rooms to act as parent room, a relaxation room, or an exercise room	Provide at least 10m^2 and 1m^2 per 10 regular occupants or staff dedicated room(s) to promote either inclusivity, mindfulness or exercise for regular occupants. Room must be classified as either parent room, relaxation / meditation / prayer room or exercise room. Room must meet light quality, acoustic comfort and Design for Inclusion (where targeted) credits.	MSA - Requires ~10 m2 dedicated occupant wellness space	2	No							Credit not feasible for commercial spaces.	
	H15.1	Connection to Nature	The building fosters connection to nature for building occupants.	Views	The building provides views, includes indoor plants, and incorporates nature-inspired design.	>60% of primary occupied spaces are within 8m of a compliant view **and**	MSA	1	No		Met					Design easily complies with the requirement for views.	
	H15.2			Plants		Indoor plants must be provided in the nominated spaces. One or more plants in pots with a soil surface area totalling at least 500cm² for every 15m² of the primary spaces is required. Plants are to be supported by an ongoing 2 year maintenance plan **or**	MSA & Elven Property		No							Considered a tenant action.	
	H15.3			Nature-Inspired Design		Five additional nature-inspired design interventions must be provided in alignment with the following principles: • Elements that provide differing natural sensory experiences; • Elements that reflect natural and cultural patterns and forms; • Using natural materials; and • Natural motifs and art.	MSA		No							Considered a tenant action.	
	H15.4			Interaction	5% of the building's floor area/ or site area (whichever is greater) is allocated to nature in which occupants can directly engage with	Occupants can interact with nature either inside the building, or externally through a green wall or roof garden. At least 5% of the building's floor area/ or site area (whichever is greater) must be allocated to this opportunity. The allocated area must be accessible and have the necessary infrastructure to allow the activity to occur (for example water source/taps for irrigation, storage area for tools and equipment).	Elven Property & MSA	1	No		0.5					Large external play space considered to meet the intent of this credit.	

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Resilient	R16.1	Climate Change Resilience	The building has been built to respond to the direct and indirect impacts of climate change.	Climate Change Resilience	The project team completes the climate change pre-screening checklist. The project team communicates the building's exposure to climate change risks to the applicant.	Complete climate change risk review checklist and issue to the building applicant.	FCDS	0	Yes		Met					Climate risk analysis has been carried out for this asset as part of DA.	
	R16.2			Climate Change Risk and Adaptation Assessment	The project team develops a project-specific climate change risk and adaptation assessment for the building. Extreme and high risks are addressed.	Complete a detailed risk assessment and Mitigation strategy using an appropriately qualified professional . Ensure at least two and all Extreme and High risks are addressed.	Whole Design Team	1	No			1				Formal CCAR not being provided, design will address major risks.	$0
	R17.1	Operations Resilience	The building can respond to acute shocks and chronic stresses that can affect its operations over time.	Comprehensive Risk Assessment	The project team undertakes a comprehensive review of the acute shocks and chronic stresses likely to influence future building operations.	Appoint a suitably qualified professional to undertake a detailed review of operations resilience including key shocks and stresses, such as infrastructure failure, health pandemic, water security, increasing energy costs and rising cyber dependency **and**	FCDS	2	No			2				Operations risk review undertaken as part of project feasibility.	$0
	R17.2			Managing Risks	The building's design and future operational plan addresses any high or extreme system-level interdependency risks.	Provide design solutions to address at least two and all high and extreme risks **and**	FCDS supported by Whole Deign Team		No							Design team have provided a strong response to community risks and stresses.	
	R17.3			Addressing Power Loss	The building's design maintains a level of survivability and design purpose in a blackout.	Complete building performance assessment in black out conditions and provide appropriate design solutions to meet building purpose and provide a measure of survivability for occupants.	FCDS supported by Whole Design Team		No							Design includes solar and batteries to mitigate black out risk.	
	R18.1	Community Resilience	The building contributes to improving the resilience of the community.	Community Resilience	The project team undertakes a needs analysis of the community, identifies shocks and stresses that impact the building's ability to service the community, and develops responses to manage these.	Appoint a qualified professional to develop a community resilience plan that identifies local community groups which rely on or interact (directly or indirectly) with the building. The plan must identify and address at least 2 and all high and extreme risks identified.	FCDS supported by Whole Design Team	1	No		1					Design considered to meet this requirement as a community childcare facility.	
	R19.1	Heat Resilience	The building reduces its impact on heat island effect.	Heat Island	At least 75% of the whole site area comprises of one or a combination of strategies that reduce the heat island effect.	Ensure >75% of site area is covered by materials which reduce heat island effect, including: * Vegetation and Green Roofs * Light Roofs (3 Year SRI>64 (flat roof) >34 (Pitched Roof) * Shaded or Light Hardscaping (3 Year SRI > 34) * Water bodies and/or water courses * Permanently Shaded site area	MSA & Lanscape	1	No		1					Design can achieve compliance with the use of light paving / building roofs for all paved areas.	
	R20.1	Grid Resilience	The building contributes to the functioning of the grid as it transitions to a higher level of renewable energy capacity.	Active Generation and Storage Systems	The building meets one or several of the following: • Provides active generation and storage systems; • Has the infrastructure to deliver an appropriate demand response strategy; or • Has reduced its electricity consumption through passive design.	Design the building to have the capacity to reduce its electricity peak demand by 10% of the building's annual peak electricity demand for at least a one-hour period. The peak demand reduction can occur through thermal storage solutions (such as chilled water storage systems), by electricity storage solutions (batteries), or through renewable on-site generation.	Mechanical & Electrical	3	No			3				Design includes solar and batteries with simple load management system.	$22,100
	R20.2			Demand Response		Develop a strategy and systems to automatically shed 10% of a buildings peak electrical demand without affecting occupant amenity for at least 4 hours. Requires the BMS to have predictive capabilities and a demand management dashboard and automatic load shedding, including acceptance of external control signals. Strategy is to be commissioned and demonstrated as functional.	Mechanical & Electrical		No						Battery systems are expected to have demand control capacity for the site.	
	R20.3			Passive Design Solutions		Deliver a naturally ventilated building which exceeds BCA requirements for building envelope performance. Alternatively, discuss options with the GBCA for alternate compliance.	FCDS & MSA		No							Building is provided with air conditioning and cannot achieve compliance with this pathway.	

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Positive	P21.1	Upfront Carbon Emissions	The building's upfront carbon emissions from materials and products have been reduced and offset.	Minimum Expectation	Reduce the building's upfront carbon emissions reductions through good design and material selection.	Complete the LCA Calculator and demonstrate that the building's upfront carbon emissions are at least 10% less than those of a reference building.	QS, FCDS & MSA	0	Yes		Met					ESD DA report provides guidance to achieve 10% target.	
	P21.2			Net Zero Path		Employ an LCA professional to demonstrate the building's upfront carbon emissions are at least 20% less than those of a reference building - including any demolition works.	FCDS, Elven Property&MSA	3	5 Star	3						No formal LCA to be undertaken	
	P21.3			Emissions Reduction		Employ an LCA professional to demonstrate the building's upfront carbon emissions are at least 40% less than those of a reference building - including any demolition works and all remaining emissions from Modules A1 – A5 are offset.	FCDS, Builder / Main Contractor, Elven Property&MSA	3	6 Star								
	P22.1	Energy Use	The building has low energy consumption.	Minimum Expectation	Reduce the building's energy consumption in comparison to BCA Section J minimum requirements. All systems and elements must exceed BCA minimum performance, irrespective of overall performance.	Complete building modelling and demonstrate that the building's energy use is at least 10% less than a reference building, excluding renewable generation on site. . For residential buildings, no individual apartment can be less than the larger number of: – The minimum NatHERS rating stated in the code, or – 6.5 star NatHERS rating.	FCDS	0	Yes		Met					Energy performance in excess of BCA requirements not considered onerous. Expect building to exceed minimum requirements by 15-20%.	$0
	P22.2			Net Zero Path		Complete building modelling and demonstrate that the building's energy use is at least 20% less than a reference building, including renewable generation on site. .	FCDS	3	5 Star	3		3				Performance is expected with proposed 20kW array	$15,000
	P22.3			Emissions Reduction		Complete building modelling and demonstrate that the building's energy use is at least 30% less than a reference building.	FCDS	3	5 Star			3				Performance is expected with proposed 20kW array	$15,000
	P23.1	Energy Source	The building's energy comes from renewables.	Zero Carbon Action Plan	Ensure the building does not require fossil fuels to operate and develops a detailed plan to achieve net carbon neutrality in operation.	Develop a zero carbon action plan and have it endorsed by the building owner. The plan is to address all Scope 1 and 2 emissions, including refrigerants on site and provide design requirements, including additional spatial and infrastructure upgrade required. The plan is to include a cost analysis including potential savings to design as net zero from practical completion.	FCDS, Hydraulic, Fire, Mechanical, Rowe & Elven Property	0	Yes	0	Met					Design excludes all fossil fuels on site. No significant value in a formal Zero Carbon action plan.	
	P23.2			100% Renewable Electricity		The building is to ensure all electricity under the control of the building owner or operator must be accounted for and sourced from renewables. Tenant electricity can be excluded. Where this is achieved by off-site renewables, a 5 Year contract must be presented.	FCDS, Hydraulic, Fire, Mechanical, Rowe & Elven Property	3	5 Star	3			3			Budget based on 10c per kWhr premium and 80% solar utilisation on site. No intent to offset.	$1,750
	P23.3			100% Renewable Energy		In addition to the above, where the building includes infrastructure which can use fossil fuels to power building systems, the applicant must demonstrate how it will not use fossil fuels during the building operation.	FCDS, Hydraulic, Fire, Mechanical, Rowe & Elven Property	3	5 Star	3			3			Cost split from the above	$1,750
	P24.1	Other Carbon Emissions	The building's emissions from refrigerants and remaining carbon sources are eliminated or offset.	Net Zero Path	Ensure the building's emissions from refrigerants and all other categories are eliminated or offset.	Utilise refrigerants with a GWP<10 or offset the GWP. Maintenance access must be provided to access and replace refrigerants.	Mechanical	2	5 Star	2			2			Refrigerant offset can be included in project approach.	$8,000
	P24.2			Emission Elimination		Eliminate all other emissions, including elements above plus; • Life-cycle emissions from modules B and C as calculated in Life Cycle Impacts; • Emissions from construction equipment use, and utilities during construction on site; and • Construction waste emission Alternatively, purchase offsets for 5 years of operational energy use at the current grid emissions coefficient.	Elven Property	2	6 Star							Cost for additional offsets excluded from project scope.	
	P25.1a	Water Use	The building has low water use.	Water Reduction - Prescriptive	Ensure the building meets minimum water performance requirements through a simple, prescriptive approach.	Provide low flow fixtures and appliances	FCDS	0	Yes		Met					Previous modelling shows ~50% reduction possible with low flow tapware and limited area of native planting.	$0
	P25.1b			Water Reduction - Performance	Ensure the building meets minimum water performance requirements through a modelled approach.	Demonstrate a 15% performance improvement over minimum compliance using the Green Star Potable Water Calculator	FCDS, Hydraulic & MSA									FCDS have completed the water calculator.	
	P25.2			Improved Water Performance	The building uses 45% less potable water compared to a reference building. Multi-unit residential buildings use 40% less potable water compared to a reference building.	Complete water modelling and demonstrate a 40 / 45% performance improvement in water consumption for the proposed development.	FCDS, Hydraulic & MSA	3	No		3					Perth does not have non-potable wateer infrastructure.	
	P25.3			Exceptional Water Performance	The building uses 75% less potable water compared to a reference building. Multi-unit residential buildings use 60% less potable water compared to a reference building.	Complete water modelling and demonstrate a 60 / 75% performance improvement in water consumption for the proposed development.	FCDS, Hydraulic & MSA	3	No							Provision of grey water not recommended for childcare. Rainwater may be considered for toilet flushing, unlikely to reach 75%.	
	P26.1	Life Cycle Impacts	The building has lower environmental impacts from resource use over its lifespan than a typical building.	Life cycle Impacts	The project demonstrates a 30% reduction in life cycle impacts when compared to standard practice.	Appoint an LCA practitioner and demonstrate an overall 30% performance improvement against all categories with no more than 10% increase in any category.	FCDS	2	No		2					Credit points are targeted on the basis of energy efficiency and upfront carbon. No detailed LCA being undertaken.	

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Places	P27.1	Movement and Place	The building's design and location encourages occupants and visitors to use active, low carbon, and mass transport options instead of private vehicles.	Showers	The building includes showers and changing facilities for building occupants that are accessible, inclusive and located in a safe and protected space.	Provide showers at a rate of 1 per 50 occupants (1 per 200 occupants over 200)	MSA - Requires 1 Showers for Occupants	0	Yes		Met					Design includes showers within the disabled toilets at ground and first floor level.	$5,000
	P27.2			Lockers		One locker must be provided for every eight staff occupants. The lockers must be secure and located in the changing rooms.	MSA - Requires 4 Lockers for Occupants	0	Yes		Met					Staff area within the child care can provide staff space to leave belongings.	$5,000
	P27.3			Accessibility and Inclusivity		Upon accessing, pedestrians and cyclists must be protected from the elements and other vehicles. Access must be safe, with consideration given to avoiding steep gradients, surface grip levels and visibility around tight corners. Access to the facilities must be well lit between entryway to bike parking, all amenities and lift lobbies and main access points to the building. All regular building occupants must have easy access to lockers, showers, and building entry. Occupants must be able to find the facilities thanks to clear signage throughout the building and access points.	MSA	0	Yes		Met					Design includes good pedestrian connections to Burswood Road.	
	P27.4			Cyclist Facilities	The building's access must prioritise walking and cycling options. This means the building's access must be well lit, weather protected, and separated from vehicles. The building must also include access to cyclist facilities that are separated from the primary vehicle entrance to ensure safety.	Provide good access for cyclists and pedestrians: * Well lit * Weather Protected * Separated from Vehicles * Signposted * Secure * Access connected to relevant cyclist storage **and**	Elven Property & MSA	3	No		1					Design includesbike parking under cover within the car park.	
	P27.5			Sustainable Transport	Prepare a sustainable transport plan which seeks to change the mode of transport away from single use vehicles.	Include: * Car share parking schemes * Infrastructure for future EV charging and parking * EV load management system **and**	Elven Property & Electrical		No		1					Design includes EV charging.	
	P27.6			Reducing Private Use	The building's design and location prioritises walking, cycling, and transport options that reduce the need for private fossil fuel powered vehicles.	Appoint a professional to provide a transport plan to reduce emissions associated with private vehicle use in comparison to a reference building. Includes reduced vehicle emissions, increase active transport and reduction in trip kilometres. **And**	Rowe & Transport		No							Sustainable transport guidance to be provided to users as part of BUG.	
	P27.7			Walkability		Provide at least 10 amenities across at least five categories within 400m of the project site. Prioritise pedestrians over cars with strict speed limits on site.	FCDS		No		1					Project has more than 12 amenities within 500m.	
	P28.1	Enjoyable Places	The building provides places that are enjoyable and inclusive.	Publicly Accessible Spaces	The building delivers memorable, beautiful, vibrant communal or public places where people want to gather and participate in the community. The spaces are inclusive, safe, flexible and enjoyable	For non-residential spaces, provide 0.25m^2/ occupant or 2.5% of GFA (whichever is greater). For residential spaces provide 1.75m^2 per dwelling, with a minimum of 250m^2. **and**	MSA - Requires 63m2 Public Access Space	2	No							Design does not include public space.	
	P28.2			Activation Strategy		Develop and fund an activation strategy to ensure placemaking continues after practical completion. The strategy must address target activities, funding, timing of activation, facilitators/suppliers, encouragement, future implementation.	MSA & Elven Property		No								
	P29.1	Contribution to Place	The building's design makes a positive contribution to the quality of the public environment.	Urban Context Analysis	The building's design contributes to the liveability of the wider urban context and enhances the public realm.	Provide an urban content report that considers economic, physical, social and cultural factors and considers planned changes to the local area. The plan should identify challenges which the building can contribute to solving and demonstrate appropriate design responses **or**	MSA	2	No					2		Project provides amenity for the community.	
	P29.2			Independent Design Review		Utilise an independent design review panel - such as the OGA - to undertake design reviews at key points in the design. As a minimum this includes at concept / schematic phase, design development phase and at building permit stage.	MSA & Elven Property		No								
	P30.1	Culture Heritage and Identity	The building reflects local culture, heritage and identity	Community Led Design Response	The building's design reflects and celebrates local demographics and identities, the history of the place, and any hidden or minority entities. This celebration was arrived through meaningful engagement with community groups early in the design process.	Produce a report detailing the community engagement activities undertaken and resultant design responses through features such as: • Community art or placemaking projects; • Selection of suppliers/designers of artwork or cultural elements; • Building elements that tell stories of the past and heritage; and • Spaces and uses that reflect the local identities. **or**	MSA & Elven Property	1	No							Design does not address local cultural or heritage values.	
	P30.2			Independent Design Review		Utilise an independent design review panel - such as the OGA - to undertake design reviews at key points in the design. As a minimum this includes at concept / schematic phase, design development phase and at building permit stag	MSA & Elven Property		No								

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
People	P31.1	Inclusive Construction Practices	The builder's construction practices promotes diversity and reduces physical and mental health impacts	Minimum Requirement	During the building's construction, the head contractor provides gender inclusive facilities and protective equipment. The head contractor also installs policies on-site to increase awareness and reduces instances of discrimination, racism and bullying.	The main contractor shall provide gender specific bathrooms and PPE on site and provide policies and training on discrimination, racism, bullying, drug and alcohol awareness and mental health.	Builder / Main Contractor	0	Yes		Met					ESD Specification to address this requirement.	
	P31.2			Needs Analysis	The head contractor provides high quality staff support on-site to reduce at least five key physical and mental health impacts relevant to construction workers. They must also evaluate the effectiveness of their interventions.	The contractor must complete a needs analysis of site workers and contractors to determine appropriate actions. The policies and programs should be relevant to all construction workers on site for the full duration of construction. A mix of programs is acceptable throughout the duration of construction period. **and**	Builder / Main Contractor	1	No					1			
	P31.3			Physical and Mental Health Impacts		The head contractor must introduce programs and solutions to address at least five of the following: • Suicide prevention; • Healthy eating and active living; • Reduce harmful alcohol and tobacco consumption and avoid drug use; • Increased social cohesion, community and cultural participation; • Understanding depression; • Preventing violence and injury; • Decreased psychological stress; and • Finding fulfilment at work or mindful meditation. **and**	Builder / Main Contractor		No							Compliance will be reviewed with the contractor. Standard OH&S provisions for some builders achieve compliance with the credit intent.	
	P31.4			Evaluating Effectiveness		Provide an evaluation report to the client and sub-contractors including programs and initiatives delivered and whether they delivered the intended outcomes.	Builder / Main Contractor		No								
	P32.1	Indigenous Inclusion	The building celebrates Aboriginal and Torres Strait Islander people, culture and heritage.	Reconciliation Action Plan	The building's design and construction celebrates Aboriginal and Torres Strait Islander people, culture and heritage by undertaking one or both of the following: • Playing an active role in the organisational Reconciliation Action Plan; and • Incorporating design elements using the Indigenous Design and Planning principles.	Ensure that the project team includes a member of the organisation RAP Working Group. In addition, at least 90% of the project RAP targets are to have been met and all implemented actions related to the RAP are publicly reported on the Project's website. Any design element must be informed by consultation undertaken with the local Aboriginal and Torres Strait Islander community or through nominated representatives. **or**	MSA & Elven Property	2	No							Project team are not working within an existing RAP.	
	P32.2			Inclusion of Indigenous Design		Demonstrate that the Australian Indigenous Design Charter are incorporated within the design. As a minimum, ensure the following are addressed: • Indigenous Led: Ensure Aboriginal and Torres Strait Islander representation in the creation of the design; • Community Specific: Ensure respect for the diversity of Aboriginal and Torres Strait Islander culture by following community specific cultural protocols; • Impact of Design: Always consider the reception and implications of all designs so that they are respectful to Indigenous culture; and • Shared Knowledge (collaboration, co-creation, procurement): Develop and implement respectful methods for all levels of engagement and sharing of Indigenous knowledge (collaboration, co-creation, procurement).	MSA & Elven Property		No								
	P33.1	Procurement and Workforce Inclusion	The building's construction facilitates workforce participation and economic development of disadvantaged and under-represented groups.	Social Procurement Strategy	Through the implementation of a social procurement strategy, at least 2% of the building's total contract value has been directed to generate employment opportunities for disadvantaged and under-represented groups.	Create a strategy which includes a description of project objectives, needs and targets, a demographic survey of the local region, description of roles and responsibilities, data collection tools and templates and reporting requirements.	Elven Property	2	No							Outside of the scope of this project.	
	P33.2			Employment Opportunities Strategies		Direct 2% of project's contract value to generate employment opportunities for disadvantaged and under-represented groups either directly, through workforce targets; or indirectly, through social procurement.	Elven Property		No								
	P33.3			Exceptional Performance	Through the implementation of a social procurement strategy, at least 4% of the building's total contract value has been directed to generate employment opportunities for disadvantaged and under-represented groups.	Direct 4% of project's contract value to generate employment opportunities for disadvantaged and under-represented groups either directly, through workforce targets; or indirectly, through social procurement.	Elven Property	1	No								
	P34.1	Design for Inclusion	The building is welcoming to a diverse population and is welcoming to their needs.	Accessible Navigation	The building is designed and constructed to be inclusive to a diverse range of people with different needs.	Ensure the building's design and construction must be able to be navigated and enjoyed by stakeholders of diverse ages, genders, and abilities (for example physical, sight, sound, mind, spectrum), including: • Equal access to the building: Provide equitable, appealing, safe, and secure access in a manner that does not segregate or stigmatise users through all principal entrance points and main thoroughfares inside and outside the building; • Diverse wayfinding: Introduce visual, physical, olfactory, and auditory solutions to help individuals navigate the site in a safe and enjoyable manner; and • Inclusive spaces: Introduce internal and external spaces for a diverse range of users, including parents, family restrooms, emergency rooms, quiet rooms and social interaction rooms. These rooms must be accessible to all users.	MSA	2	No					2		Green Star has recently reduced benchmark to allow for reduced outcomes. Provision of lifts and UATs may achieve outcome, to be reviewed as design progresses.	
	P34.2			Design for Dignity	Engagement with target groups has informed the inclusive design.	Ensure the design aligns with best practice guidelines, such as the Design for Dignity Guidelines: Principals for Beyond Compliance Accessibility in Urban Regeneration. Building solutions that are expected to be included would be assistive technologies, emotional health spaces, acoustic treatments, adaptive strategies, gender, size, and physical appropriate facilities.	MSA	1	No								

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Nature	N35.1	Impacts to Nature	Ecological value is conserved and protected.	Impacts to Nature - Minimum Requirements	The building was not built on, or significantly impacted, a site with a high ecological value.	Ensure site preparation and construction works do not clear: – Old-growth forest, – Prime agricultural land, – Any area within 100m of a wetland listed as being of 'High National Importance', – Aspects considered 'Matters of National Significance' listed under the Environmental Protection and Biodiversity Conservation Act (1999)	FCDS	0	Yes		Met					No major issue for this project. Site is compliant.	
	N35.2			Light Pollution to Neighbouring Bodies		Demonstrate that all outdoor lighting on the project complies with AS 4282:1997 Control of the obtrusive effects of outdoor lighting.	Electrical		Yes		Met					Project will minimise light spill.	
	N35.3			Light Pollution to Night Sky		Demonstrate that no external luminaire on the project has a ULOR that exceeds 5%, relative to its actual mounted orientation **or** that the direct illuminance from external luminaires on the project produce a maximum initial point illuminance value no greater than 0.5 Lux to the Site Boundary and 0.1 Lux to 4.5m beyond the site into the night sky.	Electrical & Lanscape		Yes		Met					Electrical consultant to design to avoid light spill.	
	N35.4			Wetland Management Plan		Where the building is within 100m of a wetland, generate and make public a site-specific Wetland Management Plan. The plan must be prepared by a qualified Ecologist or other qualified professional and include requirements for ongoing quarterly monitoring, annual reporting and management of the wetland ecosystem for a minimum of five years.	Elven Property & Lanscape		Yes		Met					Not applicable for this site.	
	N35.5			Ecological Value	• The building's design and construction conserves existing natural soil, hydrological flows and vegetation elements; and • If deemed necessary by an Ecologist, at least 50% of existing site with high biodiversity value is retained.	Demonstrate to current, future and past ecological values of the site are to be protected. Including assessment of local and regional threats and mitigation requirements and engaging with the local community **and**	Elven Property & Lanscape	2	No					2		Project meets this requirement. Existing site is developed building and hard stand.	
	N35.6			Diversity Protection		Where an ecologist has assessed the area as high ecological value the project must retain at least 50% of the site area and manage impacts of light and noise pollution, habitat connectivity, water quality, migration and two other local issues.	Elven Property & Lanscape		No							Project is not considered high ecological value.	
	N36.1	Biodiversity Enhancement	The building's landscape enhances the biodiversity of the site.	Landscape Area	• The building's site includes an appropriate landscape area; • The landscaping includes a diversity of species and prioritises the use of climate-resilient and indigenous plants; and • The project team develops a site-specific Biodiversity Management Plan and provides it to the building owner or building owner representative.	Provide landscaping over 15% of the site area or 0.2% of the GFA - whichever is Greater.	Lanscape - Requires ~178m2 Landscaped Area	2	No							Design has planting on structure.	
	N36.2			Diversity of Species		Landscape must be > 60% indigenous and achieve diversity of: * 10% Plant Species * 20% plant genus * 30% plant family. Provide 1 nesting tree per 500m^2 of landscaped area.	Lanscape		No							To be reviewed with landscape designer, considered difficult with turf.	
	N36.3			Biodiversity Management Plan		An ecologist must assess and verify that the choice of landscaping and biodiversity is diverse and resilient to climate change impacts, thereby increasing the longevity of the landscape. An Ecologist must provide this narrative.	Lanscape		No							No biodiversity plan is to be produced.	
	N36.4			Increased Landscape Area	• A greater area of landscaping is provided; and • The landscaping includes critically endangered and/or endangered plant species native to the bioregion.	Provide landscaping over 30% of the site area or 0.333% of the GFA - whichever is Greater.	Lanscape - Requires ~395m2 Landscaped Area	2	No							Design does not achieve 30%	
	N36.5			Increased Diversity of Species		Landscape must be > 80% indigenous and achieve diversity of: * <10% Plant single species * <20% Plants single genus * <30% Plants single family. Provide 1 nesting tree per 250m^2 of landscaped area.	Lanscape		No								
	N37.1a	Nature Connectivity	Wildlife movement is facilitated within and adjacent to the site	Landscaping	The site must be built to encourage species connectivity through the site, and to adjacent sites - through either landscaping **or** Infrastructure. If the project sits within a blue or green grid strategy it must contribute to the goals of the strategy.	Provide landscape which is contiguous with existing, restored and new habitats. As a minimum requirement for habitat connectedness, the conservation area must make up at least 25% of the total external area within the building's site boundary to a minimum of 182m²	Lanscape	2	No							Design does not connect green spaces across site.	
	N37.1b			Infrastructure		Include design features such as a canopy bridge, wildlife tunnels, green roofs, amphibian tunnels and green infrastructure are used to connect nature on site to adjacent natural areas	Lanscape & Civil		No								
	N38.1	Nature Stewardship	Biodiversity is restored beyond the building site.	Offsite Restoration	The building owner, as part of the project's development, undertakes activities that protects or restores biodiversity at scale beyond the development's boundary.	Achieve "Impacts to Nature" credit and restore an area at least equivalent to the GFA of the project.	Elven Property	2	No							Outside of project team scope.	
	N39.1	Waterway Protection	Local waterways are protected, and the impacts of flooding and drought are reduced.	Run Off Volume	The building demonstrates an annual average flow reduction (ML/yr.) of 40% compared to pre-development levels and meets specified pollutants targets.	The development must demonstrate an annual average flow reduction (ML/yr.) of 40% compared to pre-development levels **and**	Civil	2	No					2		Design expected to infiltrate stormwater on site - avoiding external stormwater systems.	
	N39.2			Water Pollution		Total Suspended Solids (TSS) 85% Gross Pollutants 90% Total Nitrogen 45% Total Phosphorus 65%	Civil		No								
	N39.3			Run Off Volume	The building demonstrates an annual average flow reduction (ML/yr.) of 80% compared to pre-development levels and meets specified pollutants targets.	The development must demonstrate an annual average flow reduction (ML/yr.) of 80% compared to pre-development levels **and**	Civil	2	No					2		Design expected to infiltrate stormwater on site - avoiding external stormwater systems.	
	N39.4			Water Pollution		Total Suspended Solids (TSS) 90% Gross Pollutants 95% Total Nitrogen 60% Total Phosphorus 70%	Civil		No								

	Ref No.	Title	Aim of Credit	Sub-Element	Credit Criteria Summary	Design Team Actions	Key Stakeholder	Points Available	Minimum Compliance?	Net Zero Pathway	Base Design	Target Feature	Stretch Target	To Be Confirmed	Unlikely Points	Comments	Cost
Leadership	M40.1	Market Transformation	Celebrates initiatives or outcomes that are deemed new and break barriers, and in turn inspire others to follow.	Inclusive Construction Practices	The project is seeking to remove physical barriers to participation in the construction workforce for different groups, particularly women who represent less than 2% of the construction and building workforce	Women in construction represent more than 2% of construction and building workforce		1	No							Credits currently under review	
	M41.1	Leadership Challenges	The project meets a Leadership Challenge developed by the GBCA	Net Zero	Where all Net Zero Pathway credits are met, a bonus credit is awarded			1	No				1			Stretch tagrts would achieve this outcom.	$0
	M41.2			Fossil Fuel Free Construction Site	The project minimises the use of fossil fuels, such as diesel, petrol or LPG, for powering construction machinery, equipment and site offices during on-site construction activities. **High Emitting** Activities are defined as: - Excavation - Demolition - Earthworks - Concrete Pumping - Piling and Drilling - Generators - Cranes	The project has achieved **Responsible Construction** Credit • **20%** of high emitting construction equipment on high emitting construction activities is fossil fuel free • The site offices are powered by **100%** renewable energy • All **electricity** used by the construction site is 100% renewable.		1	No							Requires discussion with contractor. Considered difficult.	
	M41.3					• **50%** of high emitting construction equipment on high emitting construction activities is fossil fuel free		1	No								
	M41.4					• **100%** of all construction equipment is fossil fuel free		1	No								
	M41.5			Responsible Products	The building's products are comprised of responsibly manufactured products.	The building has both Best Practice Products and a high amount of Good Practice Products for structure, envelope, systems and/or finishes		1	No								
	M41.6					The building has both Best Practice Products and a high amount of Good Practice Products for structure, envelope, systems and/or finishes		1	No								
	M41.7					The building has both Best Practice Products and a high amount of Good Practice Products for structure, envelope, systems and/or finishes		1	No								
	M41.8					The building has both Best Practice Products and a high amount of Good Practice Products for structure, envelope, systems and/or finishes		1	No								
	M41.9			Circular Economy	The project team has identified and implemented circular economy initiatives to increase the circularity of material/s/product/s within the supply chain/s of the project.	• The project team identifies and implements circular economy principles and initiatives • The project team demonstrates an increased circularity of 10% (weighted by cost)		2	No								
	M41.10					The project team demonstrates an increased circularity of 20% (weighted by cost)		1	No								

Design Review Report

Chair review

Location/Venue: **N/A**

Meeting Date: **Thursday 4th September 2025**

Meeting Time: **N/A**

Item: **Development Application for Child Care Centre and Offices at No. 147 Burswood Road, Burswood**

Design Review Report – Chair review		
Subject	**Child Care Centre and Offices at No. 147 Burswood Road, Burswood**	
Design Reviewers	Malcolm Mackay	Chair
Declarations	None	

Design quality evaluation		
Principle 1 **Context and character**		*Good design responds to and enhances the distinctive characteristics of a local area, contributing to a sense of place.*
Comments and Recommendation		**Strengths** a) Inclusion of a streetscape elevation and photograph of nearby development helps an appreciation of the local context. b) The development provides an address to both the street and the laneway. c) The introduction of face brick is a positive response to the sense of place. d) The recessed doorways are a good response to the traditional streetscapes of the broader locality. **Areas for improvement** e) None. ***Recommendations*** ***1. None.***
Principle 2 **Landscape quality**		*Good design recognises that together landscape and buildings operate as an integrated and sustainable system, within a broader ecological context.*
Comments and Recommendation		**Strengths** a) A relatively comprehensive landscape plan has been prepared by a landscape professional, which also extends to the verge. b) (Small) trees and other landscape has been introduced into the laneway interface. c) A landscape design for the rooftop playscape has

		been provided, which provides for a range of well-shaded play experiences with some landscape in planters. d) The predominantly native planting palette is supported. e) There is reasonable diversity in the planting palette. f) Landscape is used to help screen the car park. g) The use of groundcover and grasses in the verge in lieu of turf is supported. **Areas for improvement** h) Whilst artificial turf is not supported by some Panel members, it's use under shade structures is as reasonable as soft-fall alternative treatments. i) Whilst tensile shade structures to the playscape are not a preferred solution, their visual impact is negligible in the context of the roof deck, and lack of durability simply becomes a recurring cost to the operator. ***Recommendations*** ***1. None.***
Principle 3 **Built form and scale**		*Good design ensures that the massing and height of development is appropriate to its setting and successfully negotiates between existing built form and the intended future character of the local area.*
Comments and Recommendation		**Strengths** a) Whilst the overall form is less than the planning framework desires, it is a reasonable outcome in the near-to-mid-term and does not preclude a more intensive outcome in the future. b) The way the built form assists in defining the street/laneway edges is good. c) The reduced upper-level setback to the laneway is a good design outcome in that it keeps the built form simple and consistent in scale with any podiums for future larger developments along the laneway. d) The use of full-height decorative screening to the playscape helps to simplify the overall form. e) The canopy to Burswood Road is a more elegant form. **Areas for improvement** f) Carefully consider the detailing and finish of the Burswood Road canopy at the detailed design stage. ***Recommendations*** ***1. Review the detail and finish of the Burswood Road canopy at the detailed design stage.***
Principle 4 **Functionality and build quality**		*Good design meets the needs of users efficiently and effectively, balancing functional requirements to perform well and deliver optimum benefit over the full life-cycle.*

Comments and Recommendation		**Strengths** a) The building appears to be functional and fit for purpose. b) A waste management plan and TIS have been provided. c) Some of the car parking space could potentially be converted into usable space, noting that the local planning framework provides significant flexibility for car-parking provision. **Areas for improvement** d) Review at the detailed design stage whether a single AC condenser (as shown on the roof plan) is sufficient and confirm locations for AC plant for the commercial tenancies. e) Check that internal corridor widths meet prevailing standards. f) Check the functionality of the bike parking at the detailed design stage, which appears to be tight and inconsistent with standards. ***Recommendations*** ***1. Review AC provision and locations. Alternatively, the ToVP may wish to address this via a condition of approval.*** ***2. Check that internal corridor widths meet prevailing standards.*** ***3. Confirm the functionality of the bike parking against relevant standards. Alternatively, the ToVP may wish to address this via a condition of approval.***
<u>Principle 5</u> **Sustainability**		*Good design optimises the sustainability of the built environment, delivering positive environmental, social and economic outcomes.*
Comments and Recommendation		**Strengths** a) A comprehensive sustainability report has been provided, although it is arguably over the top. b) The inclusion of PV on the roof is good. c) The inclusion of an EV bay is positive, but providing multiple power outlets to the staff bays may be a more effective form of charging. d) The demonstration of how the upper floor could be developed in the future is positive. **Areas for improvement** e) EV provision would be better achieved through multiple electrical points for staff parking rather than a sole dedicated EV charger. This would also better provide for growth in EV use. f) Whilst the sustainability report is commendable, focus on a commitment to sustainability initiatives that can be readily assessed as having been included at the BP and PC stages – this would be easier and clearer than going down the Greenstar

		pathway. ***Recommendations*** ***1. Review the form and quantity of EV charging.*** ***2. Commit to sustainability initiatives that can be readily assessed as having been included at the BP and PC stages.*** ***3. The ToVP may wish to include a condition of approval that requires a clarification of the included sustainability commitments to the Town's satisfaction, prior to Building Permit to ensure appropriate follow-through from the aspirations expressed at DA stage.***
Principle 6 **Amenity**		*Good design optimises internal and external amenity for occupants, visitors and neighbours, providing environments that are comfortable, productive and healthy.*
Comments and Recommendation		**Strengths** a) Generally, there is good access to light and ventilation in the childcare centre. b) The canopy over the footpath is positive. c) Bike parking is undercover. d) An acoustics report has been provided, which demonstrates that acceptable responses to noise nuisance can be readily achieved (subject to further detail). e) The disabled WC can double as an EOT facility. **Areas for improvement** f) Consider swapping the office and the meeting room so the office has an outlook to the entrance. g) Review the effectiveness of the Burswood Canopy to provide weather protection in cross-section. h) Make the car park more inviting and amenable though the playful use of colour. i) Consider the placement of the WC pan or door location in the context of sightlines into Activity 4 toilet. ***Recommendations*** ***1. Review the relative placement of the office and meeting room to the childcare centre.*** ***2. Be more playful in the finishes/colours to the car park.*** ***3. Review the effectiveness of the street canopy.*** ***4. Optimise privacy of WCs.***
Principle 7 **Legibility**		*Good design results in buildings and places that are legible, with clear connections and easily identifiable elements to help people find their way around.*
Comments and Recommendation		**Strengths** a) Pedestrian access from the street to the tenancies is good, with the doors articulated with recesses. b) Pedestrian access to the childcare centre is

		available through the lobby/car park. c) The mesh screening provides children with an outlook to the rest of the world. d) A dedicated pedestrian path from the laneway to the childcare centre entrance has been provided. **Areas for improvement** e) For clarity, show the childcare logo above the entrance from the street rather than just 'signage'. f) Use the footpath material for the disabled bay landing area to provide visual continuity of the pedestrian route. g) Also, consider treating the disabled bay in the same manner (material and height) as the footpath to suggest a generosity of pedestrian space when the bay is not occupied. h) Investigate whether the childcare entrance and stair on Burswood Road can be swapped to straighten the pathway to the childcare centre. ***Recommendations*** ***1. Better relate the childcare centre signage to the childcare entrances.*** ***2. Better integrate the disabled parking bay and landing space into the pedestrian realm within the car park. Alternatively, the ToVP may wish to address this a condition of approval.*** ***3. Investigate whether the childcare entrance and stair on Burswood Road can be swapped.***
Principle 8 **Safety**		*Good design optimises safety and security, minimising the risk of personal harm and supporting safe behaviour and use.*
Comments and Recommendation		**Strengths** a) Passive surveillance of the street and the laneway is achievable. b) A gated forecourt has been included to prevent 'escapees'. c) Adequate sightlines appear to have been provided. d) A dedicated pedestrian path from the laneway to the childcare centre entrance has been provided. **Areas for improvement** e) Provide an overview of lighting after dark. f) Check fire requirements at an early stage to avoid the need for an amended approval at the BP stage. g) Add a wheel stop to the bay opposite the turning bay. ***Recommendations*** ***1. Ensure during the detailed design process that there is adequate lighting to all pedestrian routes.*** ***2. Add the missing wheel stop.***

		3. Check the design against fire requirements during the detailed design process.
Principle 9 **Community**		*Good design responds to local community needs as well as the wider social context, providing environments that support a diverse range of people and facilitate social interaction.*
Comments and Recommendation		**Strengths** a) The childcare centre provides a service to the community. **Areas for improvement** b) Consider at the detailed design stage how the treatment of the decorative screening can contribute meaningfully to the sense of place (rather than mere whimsy). ***Recommendations*** ***1. Refine the decorative screening at the detailed design stage to make it more place specific.***
Principle 10 **Aesthetics**		*Good design is the product of a skilled, judicious design process that results in attractive and inviting buildings and places that engage the senses.*
		Strengths a) The palette of materials and colours has appeal and responds broadly to the context, especially the red face brick. b) The decorative screening has potential for a high level of visual interest, subject to its detailed resolution, consider also dressing it down to screen the car park opening rather than relying on landscape. c) The architectural expression has a well-resolved simplicity in its form and elements. **Areas for improvement** d) The car park area could be more playful by simply using applied colour creatively, likewise, the pedestrian entry from Burswood Road. e) Whilst the brickwork is strongly supported, wrap it around the corners to avoid it reading as a thin veneer. f) Consider how the walls on the side boundaries could be treated to offer some visual relief before the adjacent sites are developed. ***Recommendations*** ***1. Use applied colour creatively in entry locations to better express the nature of the childcare centre.*** ***2. Review the treatment of the side walls and how/where they meet the face brick elevations.***

Design Review progress					
	Supported				
	Pending further attention				
	Not yet supported				
	Yet to be addressed				
		DRP meeting 1	***DRP meeting 2***	***Chair review***	***DRP meeting 4***
Principle 1 - Context and character		*No colour assigned*			
Principle 2 - Landscape quality		*No colour assigned*			
Principle 3 - Built form and scale		*No colour assigned*			
Principle 4 - Functionality and build quality		*No colour assigned*			
Principle 5 - Sustainability		*No colour assigned*			
Principle 6 - Amenity		*No colour assigned*			
Principle 7 - Legibility		*No colour assigned*			
Principle 8 - Safety		*No colour assigned*			
Principle 9 - Community		*No colour assigned*			
Principle 10 - Aesthetics		*No colour assigned*			

Concluding remarks

The Panel thanks the Applicant for presenting the updated design, which is a significant improvement on the initial iteration and is broadly supported by the Panel. Since the second review, the landscape and playscape proposals have also been significantly improved.

The design has now reached a point where it is considered by the Panel to satisfy the 10 design principles of SPP7. Nevertheless, the Panel has helpfully identified areas for further improvement that could be addressed during the detailed design process, some of which the ToVP may wish to cover with a condition of approval to ensure they are resolved prior to Building Permit.

In summary, the proposed design is a good example of how a childcare centre can be integrated into an urban environment and, if well-executed in the detailed design stage, has the potential to be an exemplary development.

Is the proposal required to go back to a future Design Review Panel Meeting?
Please tick one of the following:

☐ **Yes – future full panel design review**
☐ **No – future chair review only**
√ **No – supported – no further review required**

Is the proposal supported?

Please tick one of the following:

☐ **Yes - Supported**

√ **Yes - Supported – pending further attention and/or conditions to be imposed**

☐ **No - Not supported**

Design Review Report endorsement & DRP Recommendation	 **Malcolm Mackay** DRP Chair 4th September 2025

SCHEDULE OF SUBMISSIONS – DA 5.2024.130.1

#	Nature of interest	Position	Comments	Applicant's Response
1	Owner of property in Harvey Street Street	Object	I have no objection to the building or the proposed use per se. However my objection to the development is based on the morning drop-off and pick-up of children. There is no adequate provision for pick-up and drop-off in the right of way. The 26 parking bays are not suitable for this purpose. (Presumably some will be allocated to the commercial tenancies, and the remainder to the facility staff). Additionally, the access to and egress from the ROW is not easy. Turning right into the ROW off Burswood Rd will cause peak hour traffic to bank up, and egress onto Burswood Rd during peak hours is also difficult and, at times dangerous. I can attest to this as the former owner and tenant of an apartment at 133 Burswood Rd. There is also a lot of parking on the ROW.	The proposal has been designed to comply with the Town's Local Planning Policy No.7, which sets out to encourage primary access from ROWs, where available. Additionally, the number of bays and their allocation is cited on the ground floor plan and its allocation/ layout has been deliberately designed by subject matter experts with experience in such facility operations. Noted, however the proposal has been carefully designed to ensure minimal disruption to the normal flow of the ROW. While some aspects of the ROW may require a longer term consideration from the Town, the proposal was submitted with a Transport Impact Statement as prepared by qualified transport engineers, which in short concludes

			My final concern is the provision for rubbish bin placement and pick up. Again my experience with 133 Burswood Rd was that there is inadequate space for bin pickup using ToVP's trucks.	that "*the development traffic is considered to have a moderate impact and can be accommodated within the existing capacity of the road network.*" The proposal has been submitted with a Waste Management Plan which confirms sufficient space to collect waste bins via the ROW - not Burswood Road.
2	Owner of property in Harvey Street	Object	Increased traffic on Burswood road and Harvey street. Currently at certain times it is extremely difficult to access Burswood road as the traffic is almost continuous. No sooner does the traffic ease from Teddington street than there is a mass of traffic from Great Eastern Highway. In the evening in particular vehicles quite sensibly us Harvey street as access from Great Eastern Highway to Shepperton Road avoiding 4 sets of traffic lights. This makes getting onto Harvey street difficult particularly when vision is limited by parked vehicles. Young children are at risk from the mass of traffic sometimes travelling at speed. This proposal will increase the traffic at peak and other times, making a nuisance in residential Harvey street,	There is no indication that Harvey Street will be impacted by this proposal. Rather this proposal anticipates an increase the number of movements along Burswood Road, and will likely require access the ROW via Hawthorne Place from the south-west as it is the Town's policy to prefer all access from a ROW where this exists. To address any traffic impacts, the proposal was submitted with a Transport Impact Statement as prepared by qualified transport engineers, which in short concludes that "*the development traffic is considered to have a moderate*

			and making access to Burswood road almost impossible. It should be noted that traffic flows both ways along Burswood road and residents accessing Burswood road have to cross two lanes of traffic at times.	*impact and can be accommodated within the existing capacity of the road network.*"
3	Owner of property in Burswood Road	Neither support or object	The right of way that is adjacent to Go Edwards Park will not support the traffic flow proposed. The Right of way needs to be upgraded prior to this approval as it currently floods due to lack of drainage, direct water flow run off from 157/155 Burswood rd Building , no parking, road bitumen to park deteriorated, blind spots when turning off Burswood rd into the right of way & no speed signs. The proposal is supported however it cannot proceed until the right of way upgrade has been consulted with current land owners.	As above, the proposal was submitted with a Transport Impact Statement as prepared by qualified transport engineers, which concludes that "*the development traffic is considered to have a moderate impact and can be accommodated within the existing capacity of the road network.*" This proposal also provides for the ceding of an addition 1m towards the widening of the ROW, helping to ensure the long-term safety of the Town's road network.

PART C – CITY OF FREMANTLE

1. Declarations of Due Consideration

2. Disclosure of Interests

3. Form 1 DAP Applications

Nil.

4. Form 2 DAP Applications

4.1 Lot 201 (No.1) Goldsbrough St and Part Lot 40 (Nos.48-68) Cantonment St, Fremantle - Revitalisation of the Elders Wool Stores to accommodate multiple dwellings, office, restaurant/cafe, shop and tavern uses - Deletion of Condition 38 – DAP/25/02837

5. Section 31 SAT Reconsiderations

Nil.

Part C – Item 4.1 - LOT 201 (NO. 1) GOLDSBROUGH STREET & PART LOT 40 (NOS. 48-68) CANTONMENT STREET, FREMANTLE – VARIATION TO DAP005/24 (SEVEN (7) STOREY MIXED USE DEVELOPMENT COMPRISING 39 MULTIPLE DWELLINGS, 174 CO-LIVING (RESIDENTIAL BUILDING) UNITS, OFFICE, RESTAURANT/CAFÉ, SHOP AND TAVERN LAND USES)

Form 2 – Responsible Authority Report
(Regulation 17)

DAP Name:	Metro Inner DAP
Local Government Area:	City of Fremantle
Proposed Amendments:	Deletion of Condition of Approval No. 38
Applicant:	Urbis
Owner:	WS 201 Asset Pty Ltd
Value of Amendment:	$ N/A
Responsible Authority:	City of Fremantle
Authorising Officer:	Chloe Johnston, Manager City Planning
LG Reference:	DAPV002/25
DAP File No:	DAP/25/02837
Date of Original DAP decision:	29 April 2025
Application Received Date:	17 July 2025
Application Statutory Process Timeframe:	90 Days
Attachment(s):	1. Approved Development Plans (29 April 2025) 2. Applicant Supporting Report (10 July 2025) 3. CoF Council Meeting Minutes Extract (9 April 2025) 4. Metro Inner DAP Meeting Minutes (29 April 2025) 5. Schedule of Public Submissions 6. Applicant Response to Submissions 7. HCWA Advice on original application (5 March 2025) 8. HCWA advice and decision on the nomination of the Skateboard Ledge to the State Register

Responsible Authority Recommendation

That the Metro Inner DAP resolves to:

1. **Accept** that the DAP Application reference DAP/25/023837 as detailed on the DAP Form 2 dated 17 July 2025 is appropriate for consideration in accordance with regulation 17 of the *Planning and Development (Development Assessment Panels) Regulations 2011*;

2. **Approve** DAP Application reference DAP/25/02387 and accompanying plans in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the provisions of the City of Fremantle Local Planning Scheme No. 4, for the proposed minor amendment to the approved seven (7) storey mixed-use development comprising 39 Multiple dwellings, 174 co-living (Residential building) units, Office, Restaurant/café, Shop and Tavern land uses at Lot 201 (No. 1) Goldsbrough Street & Part Lot 40 (Nos. 48-68) Cantonment Street, Fremantle, subject to the following amended/deleted conditions:

Deleted Condition(s):

38. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

- *Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.*

- *Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.*

Additional Advice Note(s):

xxviii. An Interpretation Plan must be developed to acknowledge both the site's historic, aesthetic and social significance as well as its contemporary use by the Western Australian and International skateboarding communities. The plan should provide a cohesive narrative that includes the Wool Stores' original industrial role and the development of this use over time, its abandonment and disuse and its more recent cultural hub for skateboarding. The Interpretation Plan and its Implementation should follow the Heritage Council's Guide to Interpretation of Heritage Places, ensuring best-practice principles are applied. The plan must include clear strategies and timeframes for delivery.

All other conditions and requirements detailed on the previous approval dated 29 April 2025 shall remain unless otherwise altered by this application.

Details: outline of development application

Region Scheme	Central City
Local Planning Scheme	City Centre Zone
Use Class and permissibility:	Multiple Dwelling (D); Residential Building (D); Restaurant/Café (D); Tavern (A) and Office (P).
Lot Size (effective):	8,466m^2 (per conditional subdivision approval WAPC161805)
Existing Land Use:	Vacant
State Heritage Register	Yes - *Elders Wool Stores, 38 Cantonment Street*
Local Heritage	☐ N/A ☒ Heritage List ☐ Heritage Area
Design Review	☐ N/A ☒ Local Design Review Panel ☐ State Design Review Panel ☐ Other

Proposal:

Pursuant to Regulation 17 of the *Planning and Development (Development Assessment Panels) Regulations 2011* an owner of land in respect of which a development approval has been granted by a DAP pursuant to a DAP application owner or applicant may apply for the relevant DAP to amend an existing approval, including applying to amend or delete conditions of which an approval is subject to, as is the subject of this application.

The proposed amendment to development approval DAP/25/02837 (*Seven (7) Storey Mixed-use Development comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/café, Shop and Tavern Land Uses*), granted by DAP on 27 April 2025, seeks to delete condition of approval No. 38 only, which reads as follows:

38. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

- *Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.*

- *Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.*

No other amendments are sought to the development approval or approved plans (Attachment 1), dated 27 April 2025, as part of this application to vary DAP/25/02837.

Background:

At its meeting on 7 April 2025, the City of Fremantle Council resolved, as part of an alternative motion, to recommend approval of the Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop and Tavern Land Uses at No. 1 (Lot 201) Goldsbrough Street and Nos. 48-68 (Lot 40) Cantonment Street, to recommend an additional condition of approval, No. 38, worded as follows:

38. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

- *Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.*

- *Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.*

Condition 38 did not form part of the alternative officer recommendation for approval on the original application, rather was included by Council in their recommendation to DAP. Council provided the following reasoning for the additional recommended condition (refer full details in Council meeting minutes (9 April 2025) at Attachment 3):

An additional condition is requested to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies.

At its meeting on 29 April 2025, the Metro Inner DAP resolved to approve the development and plans (Attachment 1), inclusive of the recommended condition No. 38. Lengthy discussion on the condition was held and an amending motion was lost (3/2) to amend the condition wording (see full details in Metro Inner DAP meeting minutes (29 April 2025) at Attachment 4).

With reference to the approved development plans (Attachment 1) and Figures 1 and 2 below, condition No. 38 requires, in effect, that the proposed reinstatement of the ground floor openings and two points of access to the development from the Cantonment Street frontage, currently shown on the approved plans as the two openings to Cantonment Street from the ‘F&B / Retail’ tenancies located in the 1920s portion of the Elders Wool Stores complex (see openings ‘A’ and ‘B’ on the marked up plans in Figures 1 and 2 below), be omitted from the proposal in revised plans, and fixed glazing replace the proposed operable glazed doors.Access to these tenancies would then be redirected to and from the central residential lobby opening (opening ‘C’ on marked up plans in Figures 1 and 2 below):

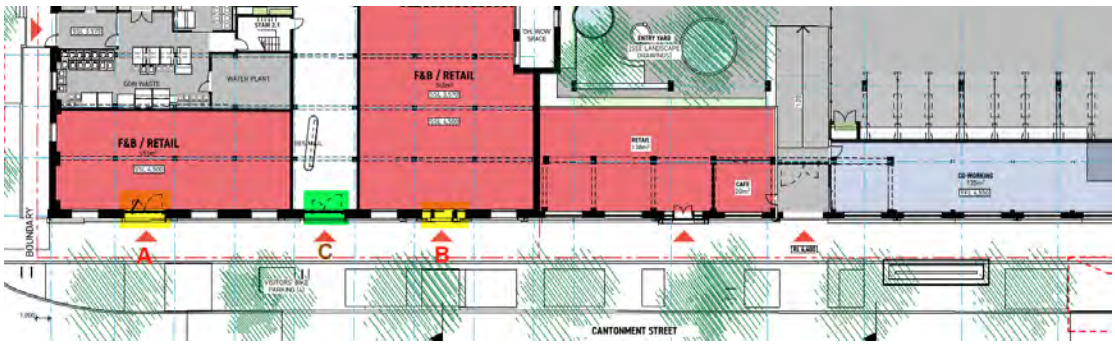


Figure 1. Marked-up floor plan showing the building/tenancy openings ‘A’ and ‘B’ would be required to be fixed glazing (non-operable) and entry to these tenancies redirected and provided from via the central residential lobby, shown as opening ‘C’ on the plan above.



Figure 2. Marked-up Cantonment Street elevation plan showing openings ‘A’ and ‘B’ that would be required to be fixed glazing (non-operable) and entry to these tenancies redirected and provided from the central residential lobby, shown opening as ‘C’ on the plan above. All openings highlighted green in the above figure would remain points of access with the imposition of condition 38.

It is noted that there is no existing ledge that spans the existing openings ‘A’ and ‘C’ as shown in figures 1 and 2 above, however, there is a 1.6m portion of existing ledge spanning the original opening ‘B’ shown in the figures above.

The applicant seeks to maintain the proposed openings and direct access from openings ‘A’ and ‘B’ shown in the figures above to the ‘F&B/Retail’ tenancies for the reasons outlined in their supporting report (Attachment 2). Conversely, condition 38 requires entry/access to the 1920s building from Cantonment Street, and the tenancies therein, from opening ‘C’ only, depicted in the above figures, for the stated reason of maintaining the ‘skateability’ of the ledge and mitigating conflict between skaters and people accessing the commercial tenancies, as is the subject of this application.

Legislation and Policy:

Legislation

The legislative framework and policy base providing for the assessment and determination of the subject application is as follows:

1. Metropolitan Region Scheme (MRS);
2. *Planning and Development (Local Planning Schemes) Regulation 2015* (WA) (the Regulations); and
3. City of Fremantle Local Planning Scheme No. 4 (LPS4).

Planning and Development (Local Planning Schemes) Regulation 2015 (WA):

- Schedule 2, Part 8, Clause 64 – Advertising applications
- Schedule 2, Part 9, Clause 66 – Consultation with other authorities
- Schedule 2, Part 9, Clause 67 – Matters to be considered by local government
- Schedule 2, Part 9, Clause 68 – Determination of applications
- Schedule 2, Part 9, Clause 70 – Form and date of determination

State Government Policies

- State Planning Policy 7.0: Design of the Built Environment
- State Planning Policy 3.5: Historic Heritage Conservation

Local Planning Scheme No. 4:

- Clause 3.2.1 (b)- City Centre zone objectives
- Schedule 7 – Local Planning Area 1 (City Centre)

Local Planning Policies

- Local Planning Policy 1.1: Planning Refunds, Amendments, and Community Consultation (LPP1.1)
- Local Planning Policy 1.6: Preparing Heritage Assessment (LPP 1.6)
- Local Planning Policy 3.6 Heritage-Protected Places Built Form and Land Use

Consultation:

Public Consultation

This variation application was advertised to all of those that made a submission on the original application though direct email correspondence. The variation application was advertised for a period of 14 days closing on 18 August 2025.

A total of 114 submissions were received over the consultation period (refer Attachment 5 for the full schedule of public submissions). The key matters raised in the submissions have been summarised and are discussed below and/or elsewhere in this report as outlined in the table below:

Table 1. Summarised Public Submissions and Officer Responses

Issue Raised	Officer comments
The condition is vital to preserving the site's cultural heritage, functionality, and international significance as a skateboarding landmark. Removing it would permanently undermine the value of this space for skateboarders, Fremantle, and visitors worldwide. The application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store.	Detailed comment on the cultural and heritage significance of the skateboarding ledge, and the nomination of the ledge with the Heritage Council, is provided in the following sections of the report.
The argument that retaining 85% of the ledge is sufficient overlooks that the 1.6m section slated for removal is the most used and most important part of the façade as it provides an uninterrupted 26.5m section of ledge. Within The West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. Losing this section would effectively destroy the spot, stripping it of international relevance and erasing a	Comments are noted by officers and the implications of the reinstatement of the original opening (opening 'B' in Figures 1 and 2 above) are discussed in the following sections of the report below.

key element of Fremantle's cultural identity.	
Deleting Condition 38 and allowing additional openings along the Cantonment Street facade will increase the risk of collisions between skateboarders and users of the building, creating conflict between pedestrians and skateboarders which may ultimately result in skateboarding being prohibited entirely and the permanent loss of this culturally significant activity and use at the subject site. The condition does not prevent retail activation but instead ensures skateboarders and pedestrians can safely share the space. It protects the last active, long-term community stakeholder group at the site which is an important part of local heritage and community, and supports continued cultural activation post-redevelopment.	These comments are noted by officers and the potential conflicts between users are discussed in the following sections of the report below.
Skateboarder activity and use of the ledge at the site fluctuates seasonally, with peak usage occurring during the summer months. Following redevelopment of the building, and assuming skateboarding-friendly retailers occupy the spaces as the applicant has suggested, the number of skateboarders using the ledges impacted by Condition 38 is expected to rise significantly.	These comments are noted by officers.

Officers acknowledge the above commentary (and comment received on the original application) highlights the importance of the skateboarding history at the subject site to the wider skateboarding community, specifically along the existing building ledge across the Cantonment Street frontage, and a desire for this activity to be continued. The commentary outlines the applicant's desired outcomes to reinstate original building openings will impact upon the level and extent of 'skateability' that is currently enjoyed at the site in the existing circumstance while the building is vacant.

While officers are not experts in skateboarding, it is expected that the comprehensive redevelopment of this privately owned development site is expected to impact the level, extent and experience of skateboarding on the site, throughout the construction period and once the building occupied and operational. It is noted the applicant is not seeking to retain this frontage specifically as a dedicated recreation space but rather seeking for a diversity of use and activation for which skateboarding is intended to form a component of.

The submissions were also provided to the applicant for review and the applicants summarised response to the submissions can be found at Attachment 6.

External Agency Referrals

Heritage Council of Western Australia (HCWA)

The variation application was referred to the Heritage Council of Western Australia as the condition (and its potential deletion) has material implications for the openings of the 1920s *Elders Wool Stores* building (State Registered place) along the Cantonment Street elevation. The following figure illustrates the portion of the development and building that forms the state registered heritage place (shown highlighted yellow):



Figure 3. Approved ground floor plan, yellow highlight depicts portion of the Elders Wool Stores complex that forms the state registered heritage place (original 1920s portion of the wider development).

HCWA provided the following response in email correspondence on 1 September 2025:

"HCWA provided its advice to the City of Fremantle on the referred proposal on 5 March 2025 (our ref P0852-52099), which remains current. (Refer Attachment 7 for HCWA's advice on the original application)

We note that the Heritage Council was supportive of the referred proposal and that Condition 38 was not part of the Heritage Council's advice.

Regarding the recent nomination of the P25707 Skateboard Ledge to the State Register, I have attached a copy of the letter dated 10 June 2025 (refer Attachment 8) *setting out the Heritage Council decision on this matter, which was previously sent to the City of Fremantle. It is relevant to note that this letter confirms that the Heritage Council's decision on the nomination does not affect its statutory advice previously provided on the referred proposal.*

In summary, the Heritage Council decision on the matter of the nomination P25707 Skateboard Ledge to the State Register, concluded as follows (full details at Attachment 8):

The Heritage Council considers that Skateboard Ledge, Cantonment Street, Fremantle is unlikely to have the cultural heritage significance required for meeting the condition for entry in the State Register under section 38 of Heritage Act 2018 as an individual place.

However, the Heritage Council resolved that an amendment to P852 Elders Wool Stores, 38 Cantonment Street, which is already entered in the State Register, warrants consideration in detail. This consideration will include a review of the heritage values and physical fabric for Skateboard Ledge, Cantonment St, Fremantle to determine whether it warrants inclusion in an amended registration.

Although the Heritage Council has requested the Department provide an updated assessment and proposed curtilage for P852 Elders Wool Stores, 38 Cantonment Street for its consideration, the amendment is not a Heritage Council priority at this time.

In the meantime, you are welcome to provide any further information you may have about Skateboard Ledge, Cantonment Street, Fremantle, as well as your views regarding its cultural heritage significance and possible inclusion in an amended registration. The City may also choose to recognise the local significance of the place by inclusion in your Local Heritage Survey, and/or protect it by inclusion on your Heritage List.

It is important to confirm that this decision does not affect the Heritage Council's statutory advice provided to the City in March 2025 in relation to the proposed development at Elders Wool Stores, 38 Cantonment Street (DAP/25/02837), which was approved by the Development Assessment Panel on 29 April 2025.

However, as Skateboard Ledge, Cantonment Street, Fremantle is now under consideration for inclusion within a Registered Place, it meets the definition of a heritage-protected place under the deemed provisions for local planning schemes (Planning and Development (Local Planning Scheme) Regulations 2015). This means that the Heritage Council would need to be notified of any proposals which may affect the ledge. In the meantime, until an amendment to Elders Wool Stores, 38 Cantonment Street has been completed, the Heritage Council's advice on any future development applications would still be provided against the current registration.

Full details of HCWA's preliminary review of the *Skateboard Ledge, Cantonment Street, Fremantle* is also provided at Attachment 8.

Planning Assessment:

LPP 1.1 – Planning Refunds, Amendments, and Community Consultation provides that in determining an amendment to a planning approval, the local government will consider whether the nature and extent of the proposed amendment is such that the use or development the subject of the planning approval:

a) remains, in substance, the same; or
b) is changed so a new and different use or development is proposed.

The proposed amendment to the existing approval, specifically the deletion of condition 38, is considered by officers to result in a development that would remain, in substance, the same, and therefore is appropriate to be considered as an amendment to an existing approval rather than requiring a separate development approval.
In terms of planning assessment, the retention or deletion of condition 38 of DAP approval DAP/25/02837, dated 29 April 2025, has been evaluated on its merits in the broader strategic planning and heritage policy framework, across the following elements of consideration:

- Design, Access and Activation; and
- Heritage Considerations.

Design, Access and Activation

From a design, access and activation perspective, officers support reinstating all of the original building openings and access points to Cantonment Street. This includes the direct street access/openings to the 'F&B/Retail' tenancies as originally proposed (and condition 38 would prohibit). Activating this street frontage is key to revitalising this historically underused part of the city centre and forms part of the priorities of the adopted Fremantle City Plan: City Centre (City Plan) and Draft Local Planning Strategy. The activation of Cantonment Street also forms the basis and objectives of the work being undertaken by the City toward the preparation of a precinct masterplan (Cantonment Street Precinct Masterplan) which aims to coordinate and deliver public realm upgrades that complement interfaces with private development within the streetscape and deliver a more pedestrian-friendly, safe and active public realm across Cantonment Street.

By allowing the direct street access and openings to the proposed 'F&B/Retail' tenancies this provides the opportunity for these tenancies to operate and be accessed independently, directly from the street, allowing for greater flexibility in their use (i.e. for differing uses with varied hours of operation) and reducing potential access and security issues that a singular shared lobby access for the various uses/tenancies may result in. Direct access to these tenancies from the street frontage may also provide greater opportunity for potential alfresco areas that spill into the streetscape from the direct openings, which could contribute to further activation of the streetscape in front of the building for varied purposes, not just the single skateboarding use.

Officers consider that the applicant's proposal has made a genuine effort to retain a majority (approximately 85%) of the Skateboard ledge, acknowledging its cultural significance to the skate community and an intent to provide for it's continued use for skateboarding purposes following redevelopment of the site, albeit different to the current situation.

It is acknowledged that it is difficult to predict how exactly the Cantonment Street frontage of the subject site and adjacent public realm may be used following the comprehensive redevelopment of the site; however, it is certainly expected to be different than the current experience with greater, diversified activity and increased pedestrian movements. Consequently, from an urban design perspective, it is important to allow flexibility in response to how the building will ultimately contribute to the activation of Cantonment Street with a primary focus on ensuring the viability of ground floor tenancies and activation of this frontage, including through skateboarding activity where possible and appropriate.

Officers consider the applicant's approach (discounting condition 38) offers a reasonable balance between activation, access, viability, community expectations and retention of enough ledge for the skateboarding use to continue where appropriate, and to enable meaningful integration of the ledge within an improved public realm and active street frontage following redevelopment.

Heritage Considerations

The following Heritage Assessment and Heritage Impact Assessment comments are based on the clauses, principles and articles included within The Burra Charter– the Australia ICOMOS Charter for Places of Cultural Significance, State Planning Policy 3.5 – Historic Heritage Conservation, HCWA Guidelines and City of Fremantle Local Planning Policies 1.6 and 3.6.

From a heritage perspective, and in consideration of advice from HCWA on the original proposal and HCWA's preliminary review of the nomination of the *Skateboard Ledge, Cantonment Street, Fremantle*, the three key considerations are:

1. **The Heritage Significance of the Skateboard Ledge at a Local Level**

   The Assessment of Significance of the Skateboard Ledge is based on the following:

   - Australia ICOMOS Charter for places of cultural heritage significance (the Burra Charter 2013)

     Article 26 – *Assess all values using relevant criteria & development a statement of significance.*

   - State Planning Policy 3.5 – Historic Heritage Conservation

     6.1 - *Local governments should identify places of local significance through the compilation and review of local government inventories, in accordance with assessment criteria and other relevant guidelines published by the Heritage Council.*

   - HCWA – Guidelines for Assessment of Local Heritage Places

     The assessment of a place should address the following values: • aesthetic • historic • scientific • social • spiritual • rarity • representativeness.

   - City of Fremantle LPP 1.6 – Heritage Administration and Procedures

Part 1 (2) *The purpose of a Heritage Assessment is to assess the cultural heritage significance of a place by examining the documentary and physical evidence, assessing the values of the place and defining a statement of significance.*

An assessment of the cultural heritage significance of the Skateboard Ledge, Cantonment Street at the local, City of Fremantle level is as follows:

- *Skateboard Ledge, Cantonment Street, Fremantle*, a low level ledge running along the Cantonment Street external façade of the Elders Wool Stores building is considered an element of the overall Elders Wool Stores place. It is considered that the ledge (within the context of the whole site) has mainly social significance and a degree of rarity for its more recent use as an internationally recognized Skate Ledge. It is not considered to have aesthetic or scientific significance. It is considered to have a minor and recent degree of historic significance.

- It is considered that *Skateboard Ledge, Cantonment Street, Fremantle,* does not warrant an individual heritage listing but does warrant mention in the description for the place.

- It would be of a lower level of significance in comparison to the building itself.

2. The impact of the current proposal (notwithstanding condition 38) on the Heritage Significance of the Skateboard Ledge

The Heritage Impact Assessment of the current proposal on the Skateboard Ledge is based on the following:

- Australia ICOMOS Charter for places of cultural heritage significance (the Burra Charter 2013)

  Article 15. Change:

  15.1 *Change may be necessary to retain cultural significance, but is undesirable where it reduces cultural significance. The amount of change to a place and its use should be guided by the cultural significance of the place and its appropriate interpretation.*

  15.3 Demolition of significant fabric of a place is generally not acceptable. However, in some cases minor demolition may be appropriate as part of conservation

  15.4 *The contributions of all aspects of cultural significance of a place should be respected. If a place includes fabric, uses, associations or meanings of different periods, or different aspects of cultural significance, emphasising or interpreting one period or aspect at the expense of another can only be justified when what is left out, removed or diminished is of slight cultural significance and that which is emphasised or interpreted is of much greater cultural significance.*

- State Planning Policy 3.5 – Historic Heritage Conservation

6.6 Development control principles

In some cases, the conservation and protection of a heritage place may require a change of use to ensure a reasonable beneficial use or return. Sympathetic adaptation and change of use should be supported in such cases.

- HCWA – How to develop and maintain heritage places

  The Heritage Council supports sensitive development and encourages best practice in the conservation of our heritage places.

  Basic principles:
  - *new work easily distinguishable from the old*
  - *reversible alterations*
  - *respect for all significant periods of construction of the place.*

- City of Fremantle LPP 1.6 – Heritage Administration and Procedures

  Part 1 (2) *The purpose of a Heritage Impact Statement is to consider the impact of a specific proposal (e.g. development) on the cultural heritage significance of a heritage place or area.*

- City of Fremantle LPP 3.6 – Heritage-protected Places Built Form and Landuse

  5.1.1 Demolition or removal of culturally significant fabric or a place is contrary to the principles and objectives of this policy and the scheme

  5.1.2 When considering partial demolition, the original / early portion of the place is to be retained and conserved.

Consideration has been given to the impact of the current proposal on the level of significance of the Skateboard Ledge within the context of the Elders Wool Stores site. In summary:

- A large percentage (approximately 85%) of the Skateboard Ledge is being retained.

- The historic and social significance of the Skateboard Ledge should be understood through meaningful interpretation.

- The Skateboard Ledge could continue to be used for skating however both the timing of use and the continuous length of the Ledge will be impacted upon.

- On balance it would be considered that the current proposal would allow the heritage significance of the Skateboard Ledge to be retained (noting that this is not a comment on the ongoing usability of the Ledge for the current level of skating).

It is also noted that the proposed reinstatement of original building openings is considered to be one of the positive heritage outcomes of this development. It is acknowledged the reinstatement of some of these openings will result in the removal of a small section of the existing ledge used for skateboarding (specifically opening B shown in Figures 1 and 2 above). Where original openings are being reinstated, it is deemed a better heritage outcome for these openings to be reinstated to match the original opening form and type (i.e. operable doors, not glazed windows) which is something condition 38 would prohibit.

3. HCWA advice regarding the Skateboard Ledge.

   Regarding the HCWA response:

   - HCWA have determined that the "Skateboard Ledge, Cantonment Street, Fremantle is unlikely to have the cultural heritage significance required for meeting the condition for entry in the State Register under section 38 of Heritage Act 2018 as an individual place."

   - HCWA have determined that "an amendment to P852 Elders Wool Stores, 38 Cantonment Street, which is already entered in the State Register, warrants consideration in detail. This consideration will include a review of the heritage values and physical fabric for Skateboard Ledge, Cantonment St, Fremantle to determine whether it warrants inclusion in an amended registration."

   - HCWA state that "this decision does not affect the Heritage Council's statutory advice provided to the City in March 2025 in relation to the proposed development at Elders Wool Stores, 38 Cantonment Street (DAP/25/02837), which was approved by the Development Assessment Panel on 29 April 2025."

   - Skateboard Ledge, Cantonment Street, Fremantle is now under consideration for inclusion within a Registered Place, it meets the definition of a heritage-protected place under the deemed provisions for local planning schemes (Planning and Development (Local Planning Scheme) Regulations 2015).

   - HCWA would need to be notified of any proposals which may affect the Ledge.

   - HCWA advice on any future development applications would still be provided against the current registration.

In summary and on balance, the proposal for the deletion of condition 38 (relating to openings/skate ledge to Cantonment Street), within the context of the whole *Elders Wool Stores* place, would have only a minor impact on the heritage significance of the *Elders Wool Stores.* Meaningful interpretation should be introduced regarding the historic and social significance of the Skateboard Ledge as is specifically required under existing condition of approval No. 22(iii)(c) that requires an Interpretation Plan be developed for the Wool Stores that includes the more recent use of the place by the Western Australian and international skateboarding community.

The existing condition of approval No. 22(iii)(c) reads as follows:

22. Prior to the lodgement of a Building Permit, the following information and/or additional detail, pertaining to the 1927 State Registered building, is to be provided to the satisfaction of the City of Fremantle on the advice of the Heritage Council of Western Australia:

iii. The following further information is to be provided to the satisfaction of the Director, Historic Heritage Conservation, prior to the application of a Building Permit:

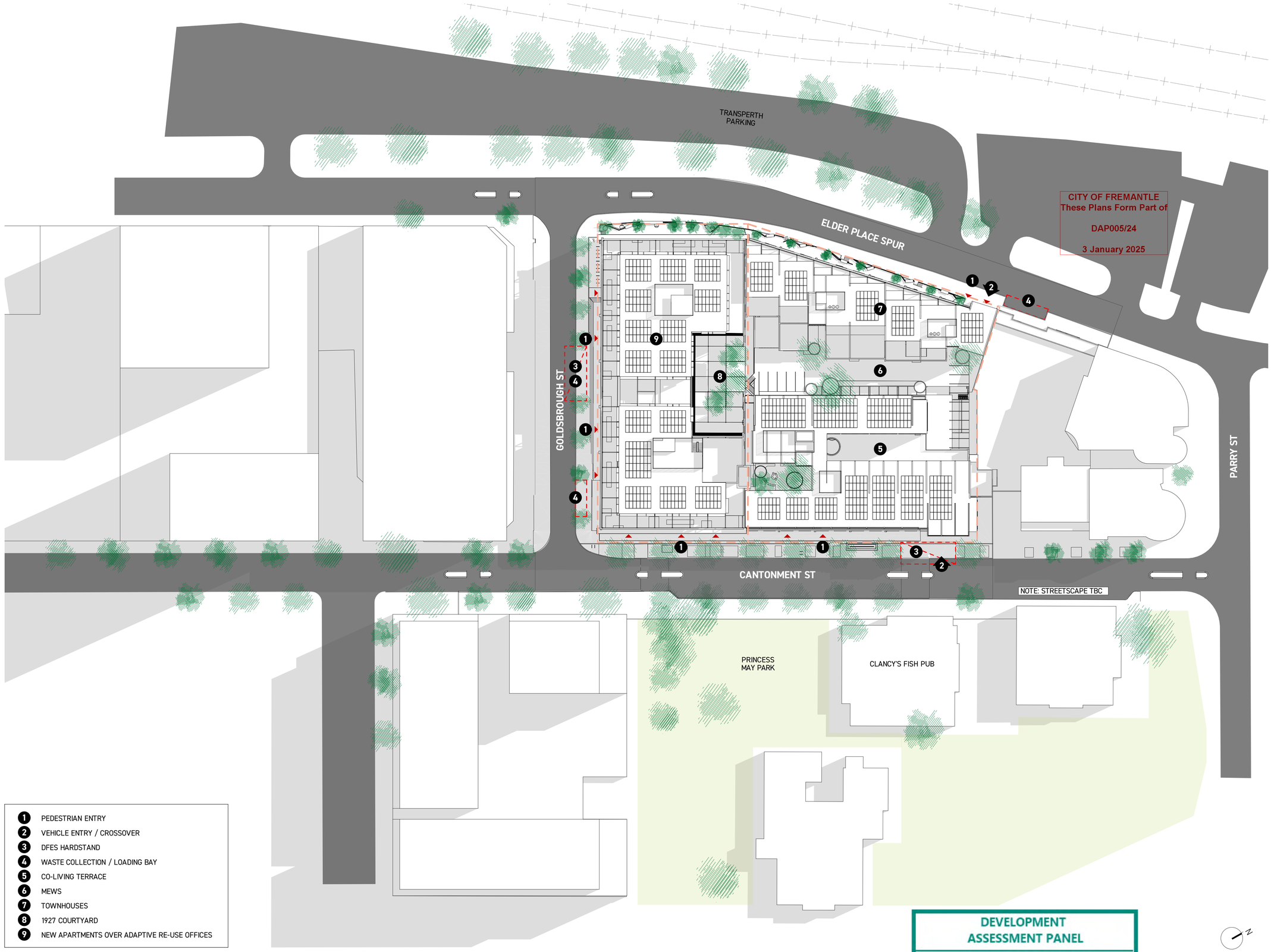
c. An Interpretation Plan for the Elders Wool Store that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent use of the place by the Western Australian and international skateboarding community.

As such, there are no objections from a heritage perspective to the deletion of Condition 38 and an advice note is recommended to complement condition No. 22(iii)(c) to assist with expectations for the required Interpretation Plan which is to include the use of the place by the skateboarding community.

Conclusion:

In conclusion, officers consider the applicant's proposal (including the deleting of condition 38) provides an appropriate balance between activation, access and viability for the development while retaining an appropriate amount of the skateboarding ledge to allow for the cultural heritage significance of the Skateboard Ledge and it's use for skateboarding activity to be satisfactorily upheld. Furthermore, the existing condition of approval No. 22(iii)(c) also requires an Interpretation Plan be developed for the Wool Stores that includes the more recent use of the place by the Western Australian and international skateboarding community to further preserve the cultural heritage significance of this element of the proposal.

While skateboarding has been a welcomed temporary use at the site, contributing to the social value of the place, ensuring its continuation and intensity as currently performed is not recommended to take precedence over comprehensive adaptive re-use of this landmark city building and revitalisation of this historically underused part of the Fremantle city centre. It is noted that the proposed investment in conservation and redevelopment of this site will, in turn, bring new street activation opportunities to Cantonment Street, which may also include a modified approach to skateboarding, once all public realm design and building activation considerations are taken into account. As such, officers support the deletion of condition 38.



CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT
ASSESSMENT PANEL
APPROVED
29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propperty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

FOR APPROVAL

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

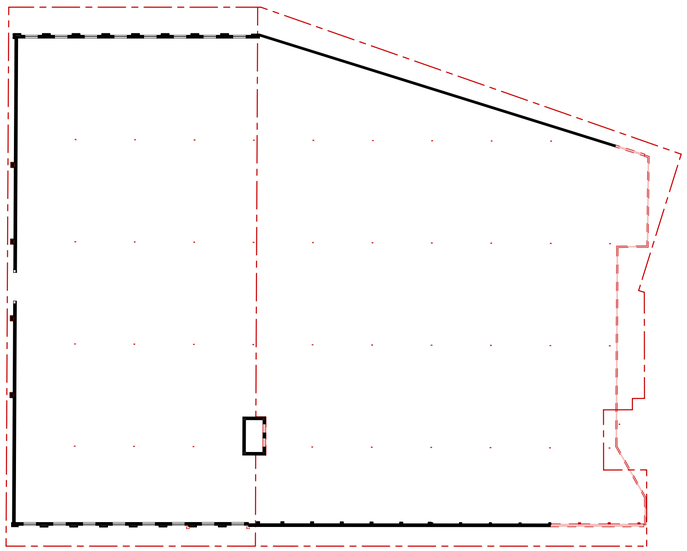
DRAWING
SITE PLAN

PROJECT STATUS
DEVELOPMENT APPROVAL

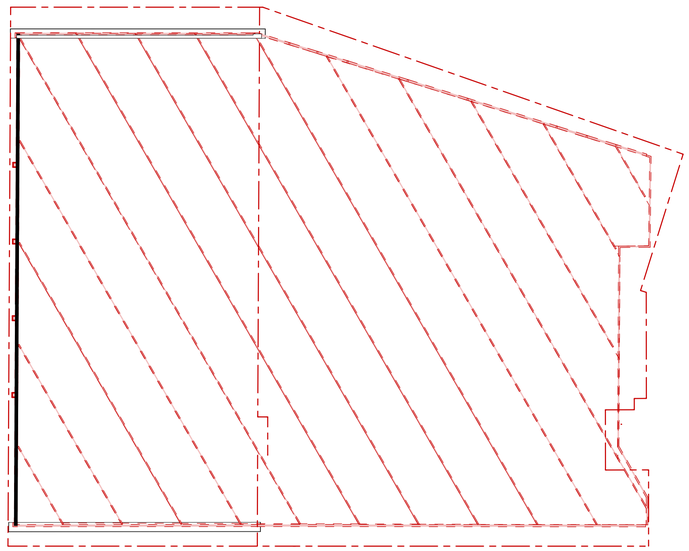
SCALE 1:500 @A1

0 5 10 20m

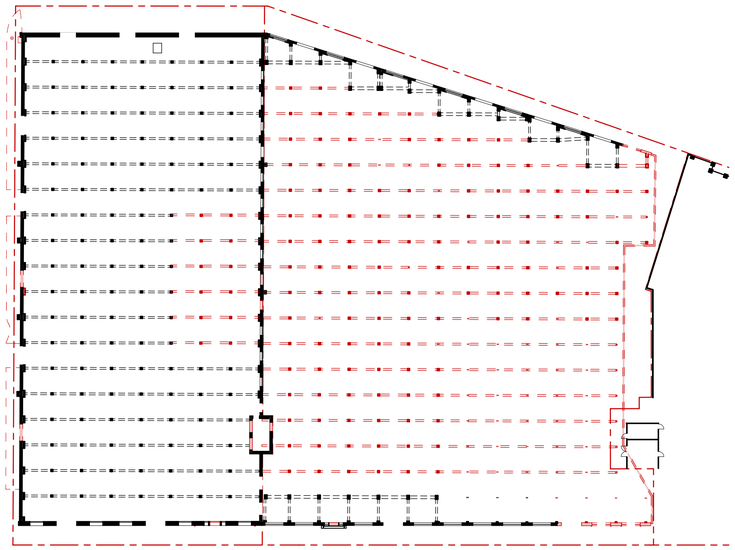
PROJECT NO	DRAWING NO	REVISION
2204	DA002	A



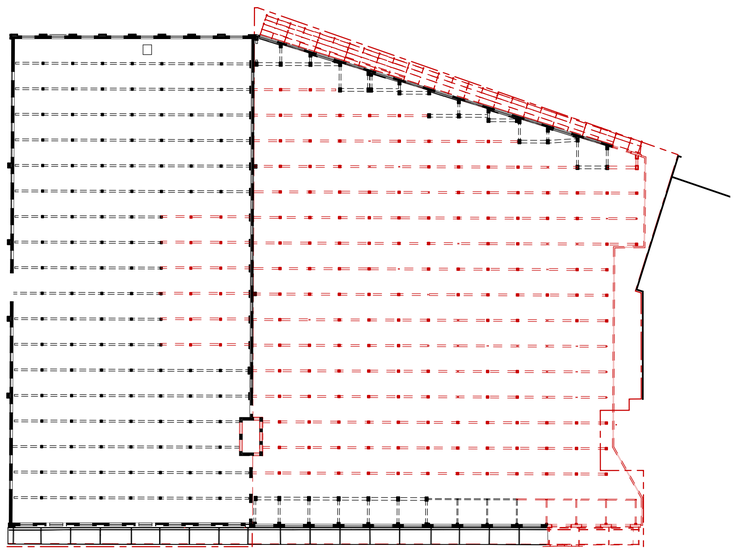
THIRD FLOOR



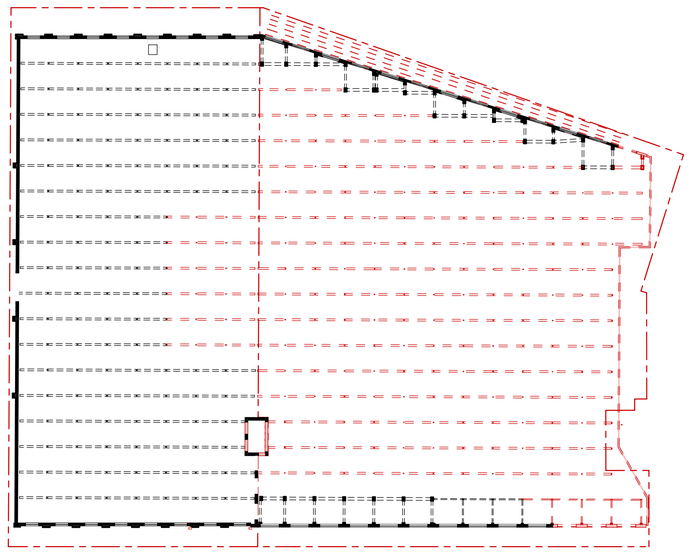
ROOF



GROUND FLOOR



FIRST FLOOR



SECOND FLOOR

CITY OF FREMANTLE
These Plans Form Part of

DAP005/24

3 January 2025

DEVELOPMENT
ASSESSMENT PANEL

APPROVED

29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propperty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

RESOURCE & HERITAGE MANAGEMENT NOTES

1920s BUILDING
- Asbestos roof and steel trusses to be removed.
- Existing brick wall above ornamental frieze to be removed on east, west and south elevations. Remaining brick facade to be retained and restored.
- Existing timber floor to be removed and set aside for reuse subject to condition.
- Existing timber joists, beams and column in proposed courtyard area to be removed and set aside for reuse. Columns, joists and beams to be removed as required to facilitate the insertion of 2 new service and lift/stair cores as shown on proposed plans.

1950s BUILDING
- Asbestos rood and steel trusses to be removed.
- Metal clad southern wall to be removed.
- Brick wall above level of ornamental frieze on 1920s building to be removed on east and west elevation.
- Existing external masonry wall and windows at northern end of east and west facade to be demolished to extent shown.
- All internal floors, columns and beams to be removed, with the exception of steel and concrete framing required to retain existing walls. Timber floor boards, joists, beams and columns to be set aside for reuse subject to condition.

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

FOR APPROVAL

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
RESOURCE & HERITAGE CONSERVATION DIAGRAM

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:500 @A1

0 5 10 20m

PROJECT NO	DRAWING NO	REVISION
2204	DA003	A

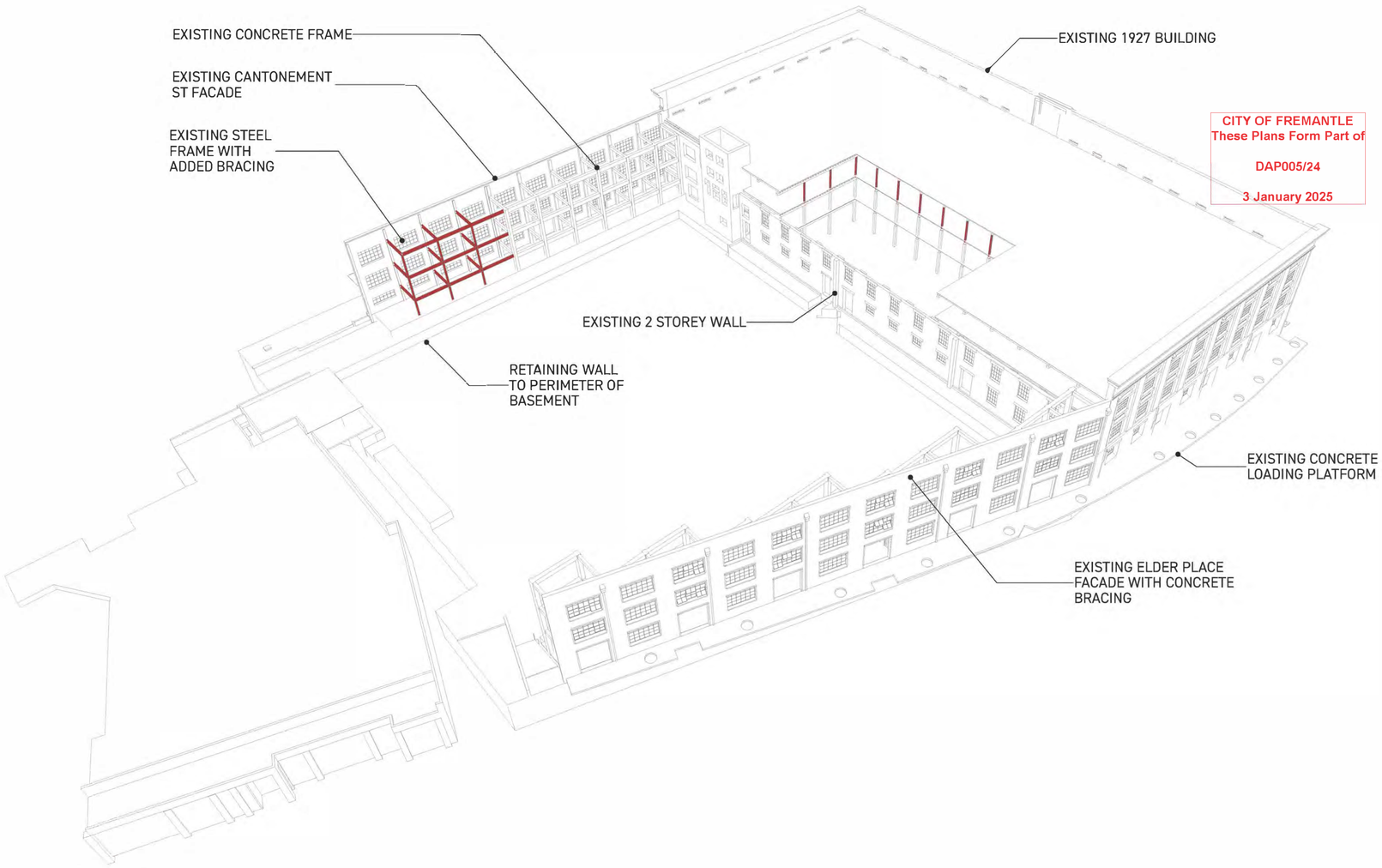
DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.



CITY OF FREMANTLE
These Plans Form Part of

DAP005/24

3 January 2025

RESOURCE & HERITAGE MANAGEMENT NOTES

1920s BUILDING
- Asbestos roof and steel trusses to be removed.
- Existing brick wall above ornamental frieze to be removed on east, west and south elevations. Remaining brick facade to be retained and restored.
- Existing timber floor to be removed and set aside for reuse subject to condition.
- Existing timber joists, beams and column in proposed courtyard area to be removed and set aside for reuse. Columns, joists and beams to be removed as required to facilitate the insertion of 2 new service and lift/stair cores as shown on proposed plans.

1950s BUILDING
- Asbestos rood and steel trusses to be removed.
- Metal clad southern wall to be removed.
- Brick wall above level of ornamental frieze on 1920s building to be removed on east and west elevation.
- Existing external masonry wall and windows at northern end of east and west facade to be demolished to extent shown.
- All internal floors, columns and beams to be removed, with the exception of steel and concrete framing required to retain existing walls. Timber floor boards, joists, beams and columns to be set aside for reuse subject to condition.

RETAINED ELEMENTS



EAST ELEVATION (CANTONEMENT STREET)



SOUTH ELEVATION (GOLDSBOROUGH STREET)



WEST ELEVATION (ELDER PLACE)

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

FOR APPROVAL

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

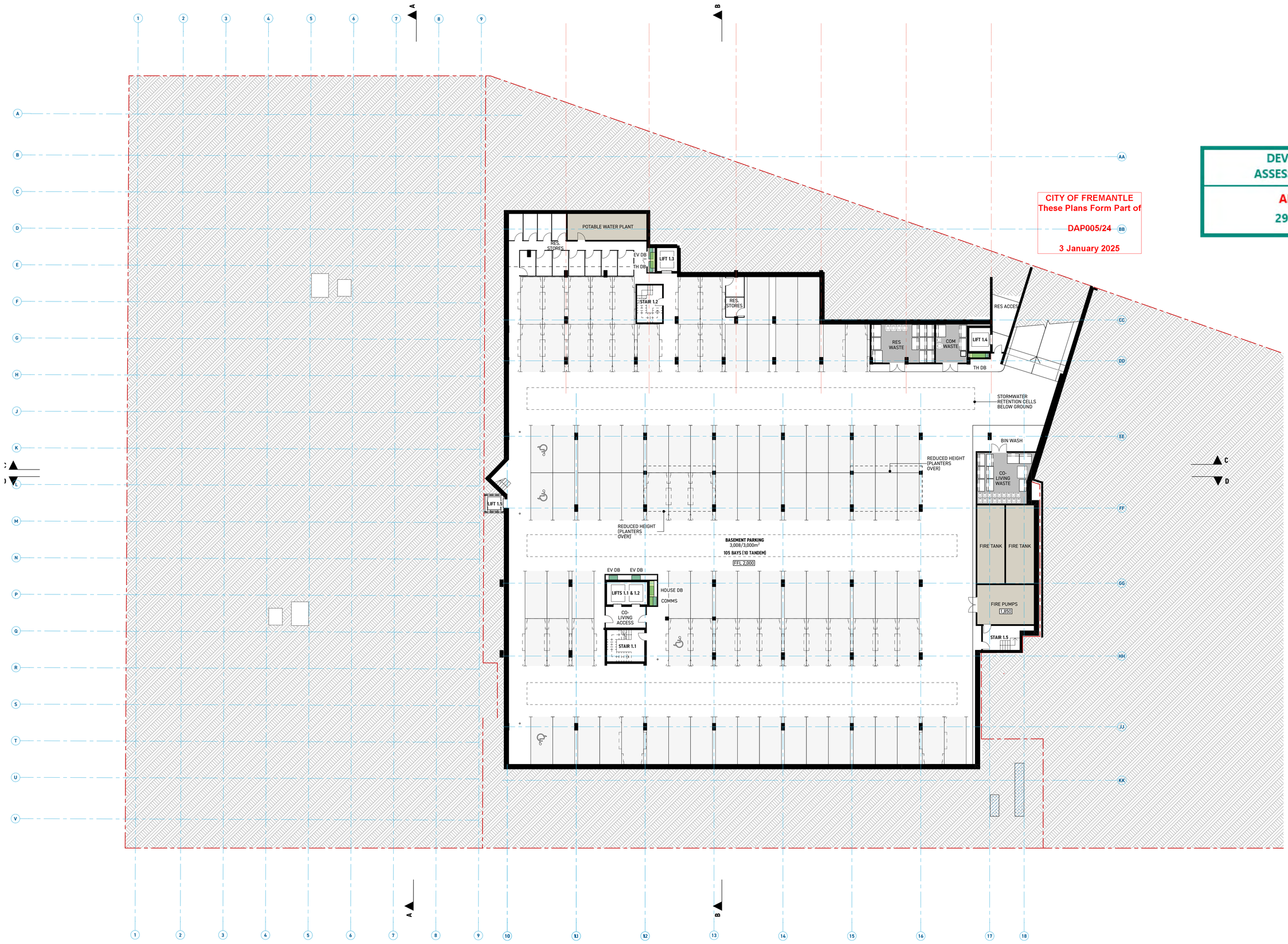
DRAWING
RESOURCE & HERITAGE CONSERVATION DIAGRAM

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:500 @A1

0 5 10 20m

PROJECT NO	DRAWING NO	REVISION
2204	DA004	A



DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT ASSESSMENT PANEL
APPROVED
29-Apr-2025

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency
PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
BASEMENT

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200, 1:100 @A1

0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA101	A



DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceagency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

DEVELOPMENT ASSESSMENT PANEL
APPROVED
29-Apr-2025

CITY OF FREMANTLE
These Plans Form Part of
DAP/25/02523
3 January 2025

SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
- > 2 hours
- 0-2 hours
- 0 hours

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency
PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305650 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
GROUND FLOOR

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:1, 1:100, 1:200 @A1
0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA102	B

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

N

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

TH6 TOWNHOUSE 6 94m²
TH5 TOWNHOUSE 5 94m²
TH4 TOWNHOUSE 4 102m²
TH3 TOWNHOUSE 3 94m²
TH2 TOWNHOUSE 2 104m²
TH1 TOWNHOUSE 1 78m²
1.01 1x1 APARTMENT 67m²
TERRACE 27m²
TERRACE 25m²
TERRACE 21m²
TERRACE 25m²
TERRACE 25m²
TERRACE 28m²
BALCONY 16m²
TH6 FONZIE 53m²
TH5 FONZIE 53m²
LIFT
7,900
LIFT 1.3
STAIR 1.4
STAIR 1.3
LIFT 1.4
STORE
8,850
GRAVEL ROOF
GRAVEL ROOF
GRAVEL ROOF

OFFICE
2,270m²
FFL 7,440
MECH PLANT
M WC
F WC
UA WC
BINS
STAIR 2.2
LIFT 2.4
LIFT 2.3
STEEL PERGOLA AND WALL BRACING STRUCTURE WITH PARTIAL ROOF COVER
LIFTS 2.1 & 2.2
F WC
UA WC
M WC
STAIR 2.1
MECH PLANT
VOID

26 STUDIO APARTMENTS
LIFTS 1.1 & 1.2
8,150
STAIR 1.1
VOID
CO-LIVING TERRACE 248m²
CO-LIVING KITCHEN/DINING 270m²
BINS
LDRY
UA WC
MECH PLANT
STAIR 1.7
STAIR 1.6
VOID
LANDSCAPED ROOF TERRACE (ADJACENT LOT)

SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
> 2 hours
0-2 hours
0 hours

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
FIRST FLOOR

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1
0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA103	B



CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT ASSESSMENT PANEL
APPROVED
29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
- > 2 hours
- 0-2 hours
- 0 hours

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency
PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
SECOND FLOOR

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1
0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA104	B



DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

N

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
THIRD FLOOR

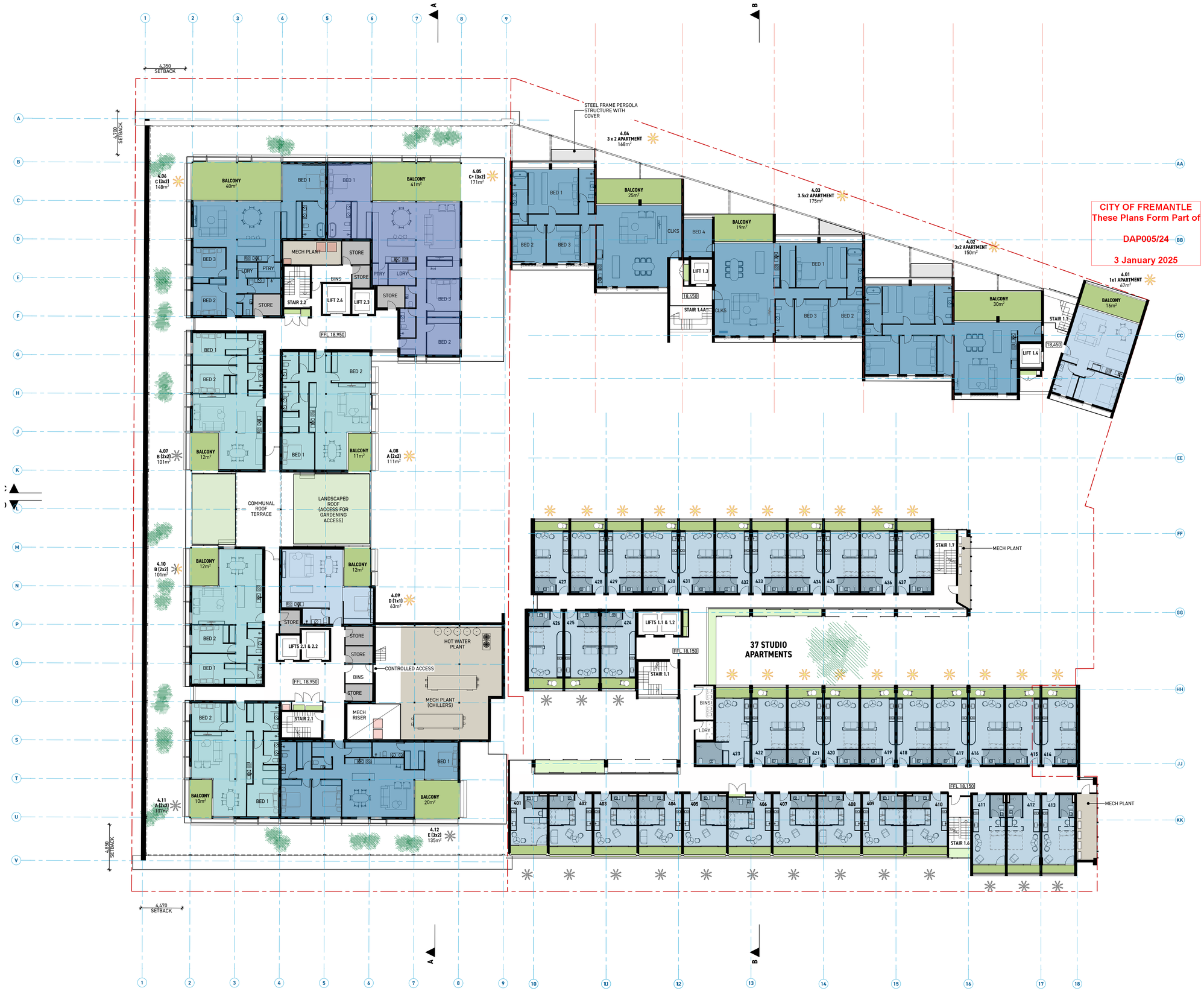
SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
- > 2 hours
- 0-2 hours
- 0 hours

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1

0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA105	B



CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT ASSESSMENT PANEL
APPROVED
29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
- > 2 hours
- 0-2 hours
- 0 hours

spaceagency
PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

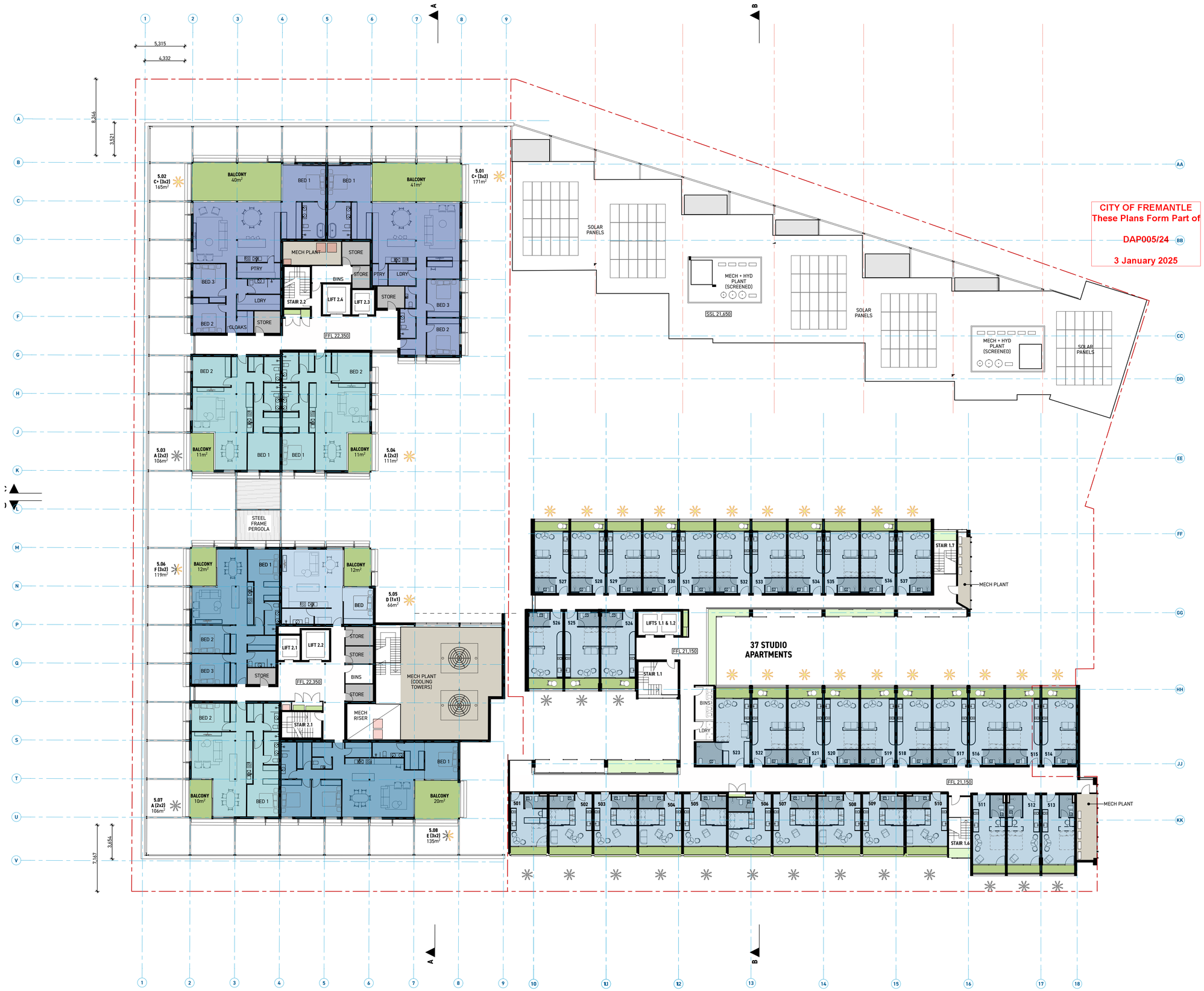
PROJECT
WOOL STORES
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
FOURTH FLOOR

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1
0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA106	B



CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT
ASSESSMENT PANEL
APPROVED
29-Apr-2025

SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
- > 2 hours
- 0-2 hours
- 0 hours

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceagency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propperty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

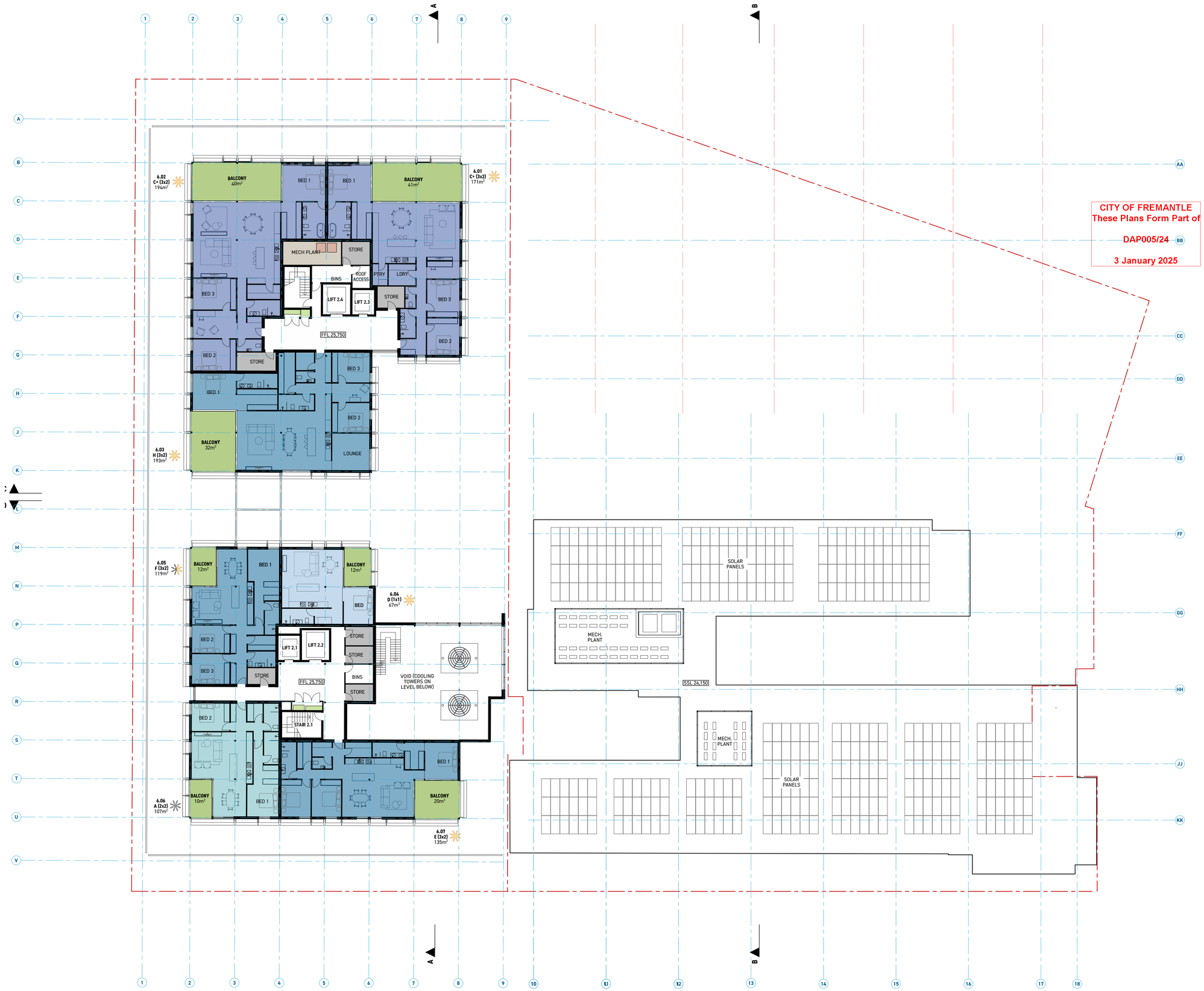
DRAWING
FIFTH FLOOR

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1

0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA107	B



DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

N

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

SOLAR ACCESS
ON 21 JUNE (WINTER SOLSTICE)
- > 2 hours
- 0-2 hours
- 0 hours

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

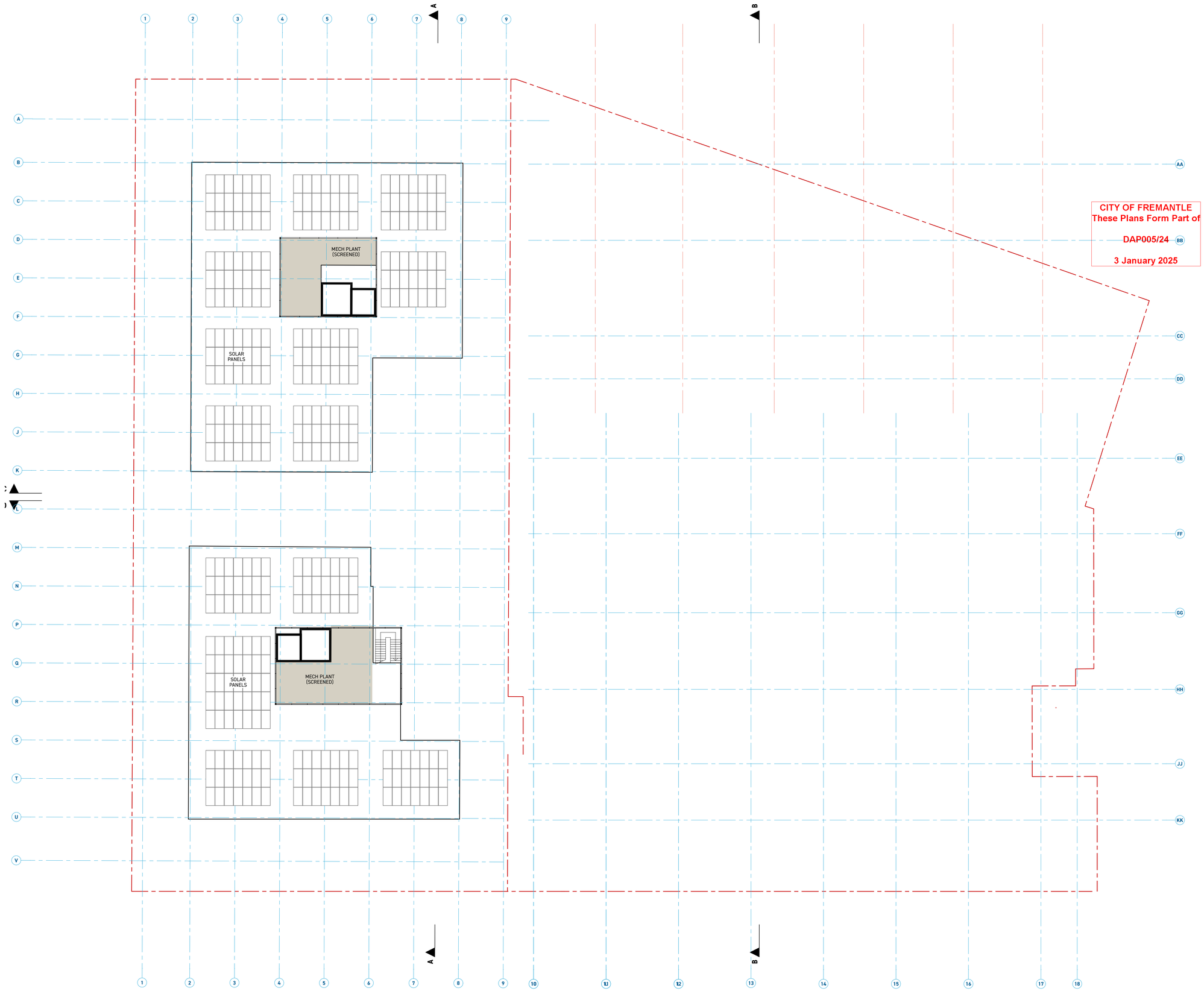
DRAWING
SIXTH FLOOR

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1

0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA108	B



CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT
ASSESSMENT PANEL
APPROVED
29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
ROOF

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1

0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA109	A



WEST ELEVATION (ELDER PLACE)



EAST ELEVATION (CANTONEMENT STREET)

CITY OF FREMANTLE
These Plans Form Part of
DAP065/24
3 January 2025

DEVELOPMENT ASSESSMENT PANEL
APPROVED
30 Apr 2025

MATERIALS

A EXISTING BRICK MASONRY AND STUCCO (RESTORED)
B METAL FRAMED WINDOWS
C GALVANISED STEEL FRAME
D NEW GLAZED DOORS
E NEW PERFORATED ROLLER SHUTTER
F NEW PERFORATED SHUTTER / BLINDS
G METAL BALUSTRADES
H METAL CLADDING
J METAL WINDOW SHROUDS
K WIRE/CABLE MESH BALUSTRADE AND TRELLIS
L METAL BALUSTRADE / FENCE
M METAL LOUVRES (ACOUSTIC WHERE REQRUIED)
N BRICK LATTICE SCREEN
P BREEZBLOCK SCREEN
Q PATTERNED PRE-CAST CONCRETE
R RENDERED MASONRY
S EXISTING METAL CANOPY (RESTORED)

NOTES

1 REMOVE EXISTING WINDOWS AND REINSTATE WINDOWS IN ORIGINAL LOCATIONS USING EXISTING LINTELS AS A GUIDE

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceagency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency
PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
ELEVATIONS

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1
0 2,000 4,000 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA201	A



SOUTH ELEVATION (GOLDSBOROUGH STREET)



NORTH ELEVATION

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceagency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

CITY OF FREMANTLE
These Plans form Part of
DAP005/24
3 January 2025

MATERIALS

A EXISTING BRICK MASONRY AND STUCCO (RESTORED)
B METAL FRAMED WINDOWS
C GALVANISED STEEL FRAME
D NEW GLAZED DOORS
E NEW PERFORATED ROLLER SHUTTER
F NEW PERFORATED SHUTTER / BLINDS
G METAL BALUSTRADES
H METAL CLADDING
J METAL WINDOW SHROUDS
K WIRE/CABLE MESH BALUSTRADE AND TRELLIS
L METAL BALUSTRADE / FENCE
M METAL LOUVRES (ACOUSTIC WHERE REQRUIED)
N BRICK LAITICE SCREEN
P BREEZBLOCK SCREEN
Q PATTERNED PRE-CAST CONCRETE
R RENDERED MASONRY
S EXISTING METAL CANOPY (RESTORED)

NOTES

1 REMOVE EXISTING WINDOWS AND REINSTATE WINDOWS IN ORIGINAL LOCATIONS USING EXISTING LINTELS AS A GUIDE

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 9430 5450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
ELEVATIONS

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200 @A1

0 | 2,000 | 4,000 | 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA202	A

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceagency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

DEVELOPMENT ASSESSMENT PANEL
APPROVED
29-Apr-2025

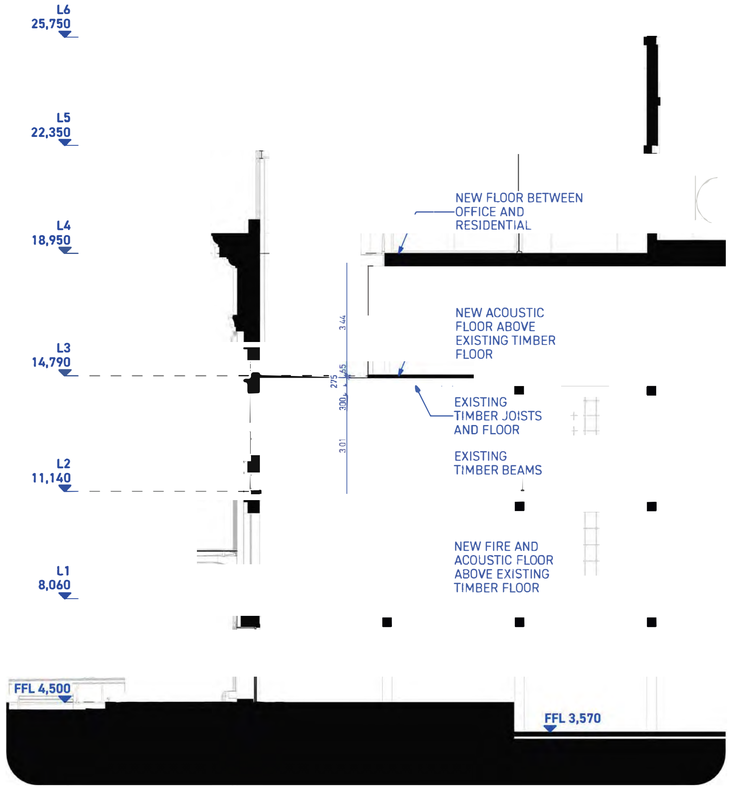


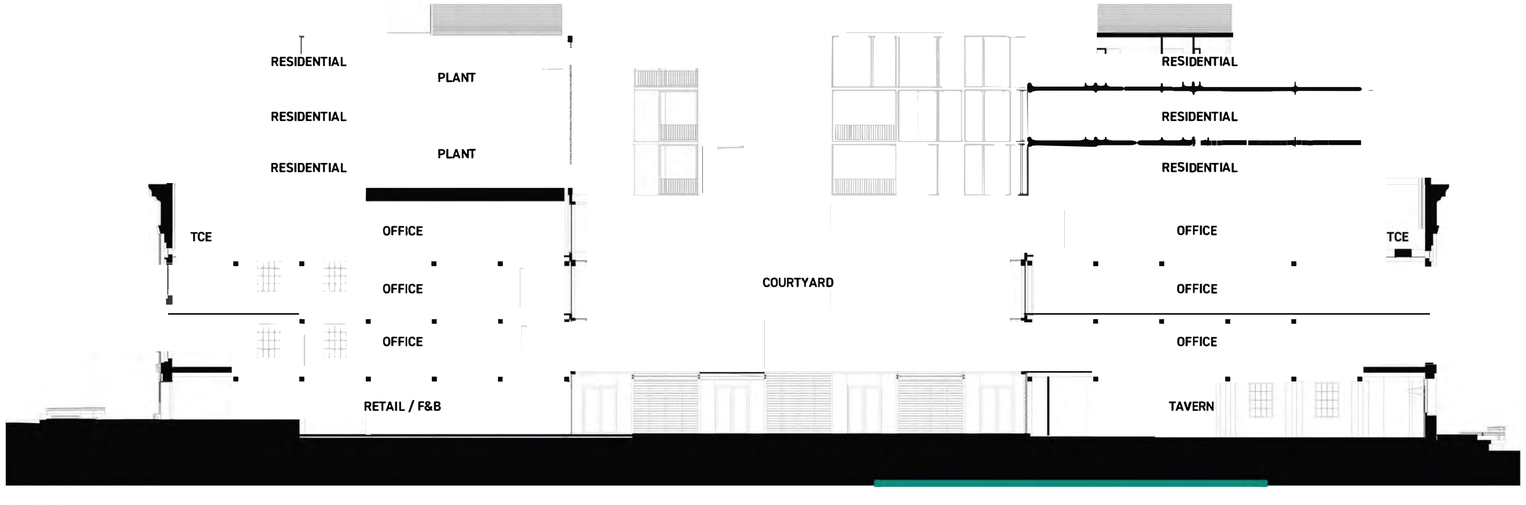
CITY OF FREMANTLE
These Plans Form Part of
DAP005/24

SECTION D

MATERIALS

A EXISTING BRICK MASONRY AND STUCCO (RESTORED)
B METAL WINDOW FRAMES UPGRADED TO ACHIEVE SECTION J COMPLIANCE
C GALVANISED STEEL FRAME
D NEW GLAZED DOORS
E NEW PERFORATED ROLLER SHUTTER
F NEW PERFORATED SHUTTER / BLINDS
G METAL BALUSTRADES
H METAL CLADDING
J METAL WINDOW SHROUDS
K WIRE/CABLE MESH BALUSTRADE AND TRELLIS
L METAL RAILINGS AND HANDRAIL
M METAL LOUVRES (ACOUSTIC WHERE REQRUIED)
N BRICK LATTICE SCREEN
P BREEZBLOCK SCREEN
Q PATTERNED PRE-CAST CONCRETE
R RENDERED MASONRY
S EXISTING METAL CANOPY (RESTORED)





SECTION A

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 9430 5450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

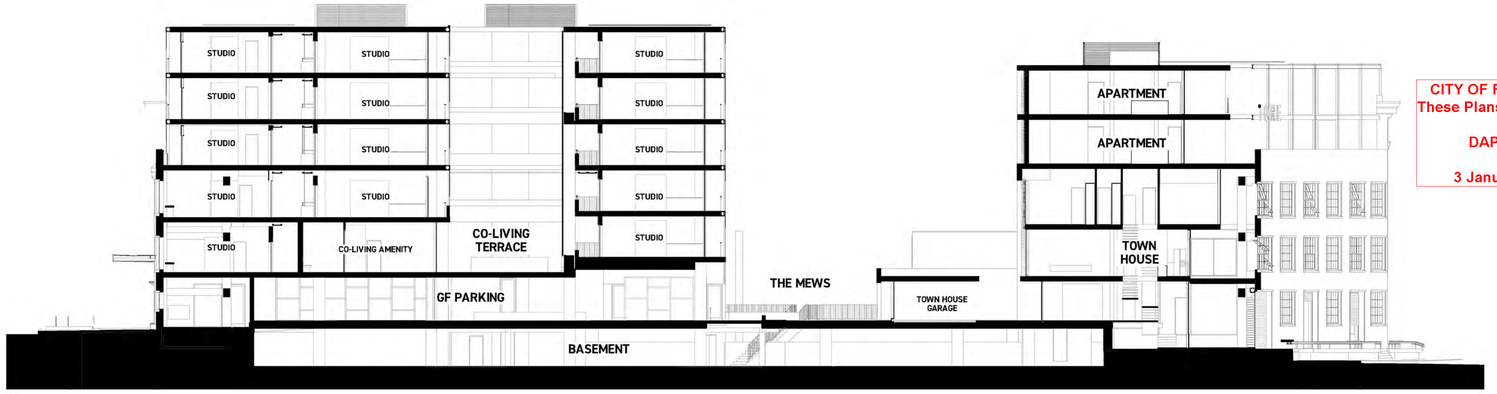
DRAWING
SECTIONS

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:200, 1:100 @A1

0 2,000 4,000 8,000

PROJECT NO	DRAWING NO	REVISION
2204	DA301	A



SECTION B



SECTION C

CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

DEVELOPMENT
ASSESSMENT PANEL
APPROVED
29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

MATERIALS

A EXISTING BRICK MASONRY AND STUCCO (RESTORED)
B METAL WINDOW FRAMES UPGRADED TO ACHIEVE SECTION J COMPLIANCE
C GALVANISED STEEL FRAME
D NEW GLAZED DOORS
E NEW PERFORATED ROLLER SHUTTER
F NEW PERFORATED SHUTTER / BLINDS
G METAL BALUSTRADES
H METAL CLADDING
J METAL WINDOW SHROUDS
K WIRE/CABLE MESH BALUSTRADE AND TRELLIS
L METAL RAILINGS AND HANDRAIL
M METAL LOUVRES (ACOUSTIC WHERE REQRUIED)
N BRICK LATTICE SCREEN
P BREEZBLOCK SCREEN
Q PATTERNED PRE-CAST CONCRETE
R RENDERED MASONRY
S EXISTING METAL CANOPY (RESTORED)

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

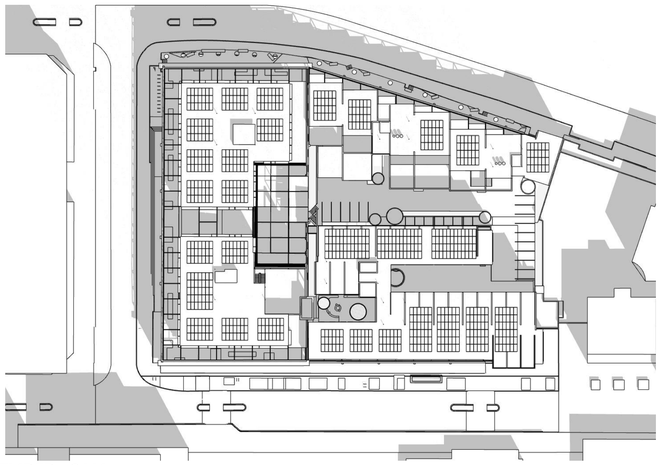
DRAWING
SECTIONS

PROJECT STATUS
DEVELOPMENT APPROVAL

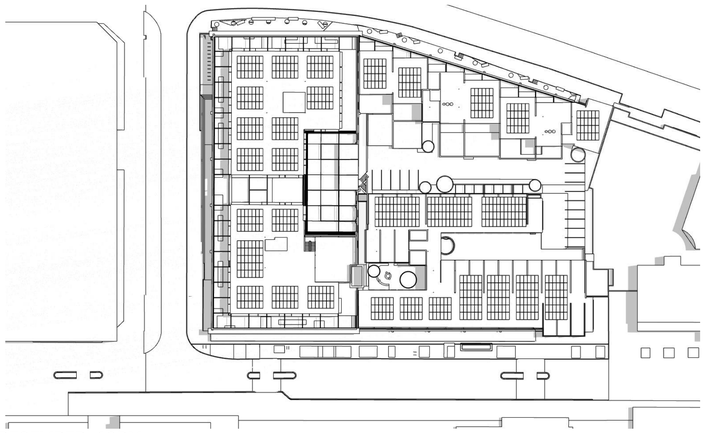
SCALE 1:200 @A1

0 | 2,000 | 4,000 | 8,000

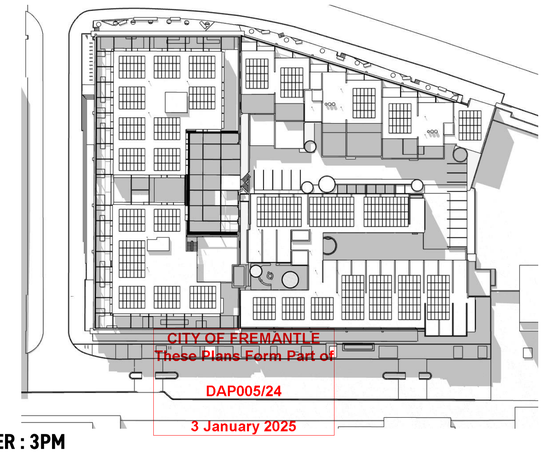
PROJECT NO	DRAWING NO	REVISION
2204	DA302	A



21 DECEMBER : 9AM

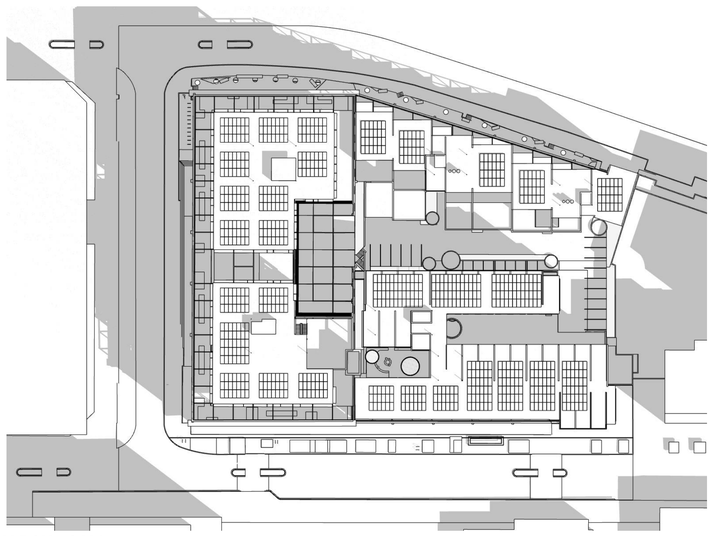


21 DECEMBER: 12PM

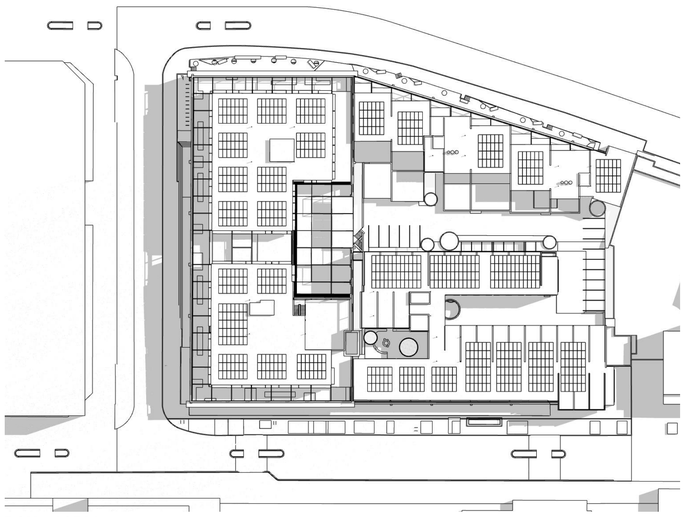


CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

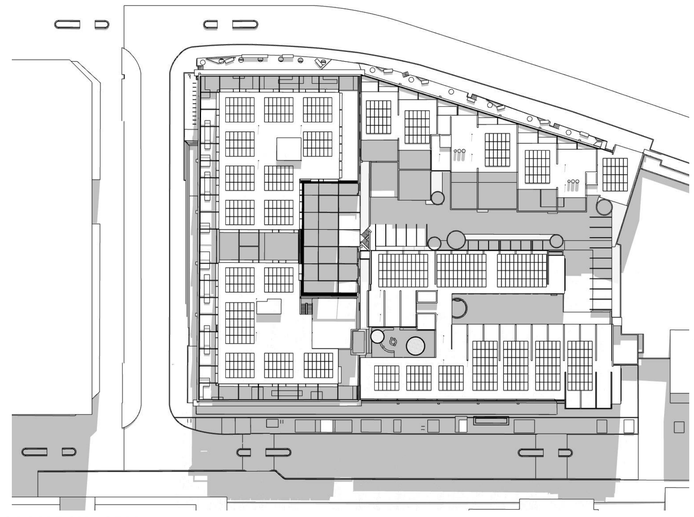
21 DECEMBER : 3PM



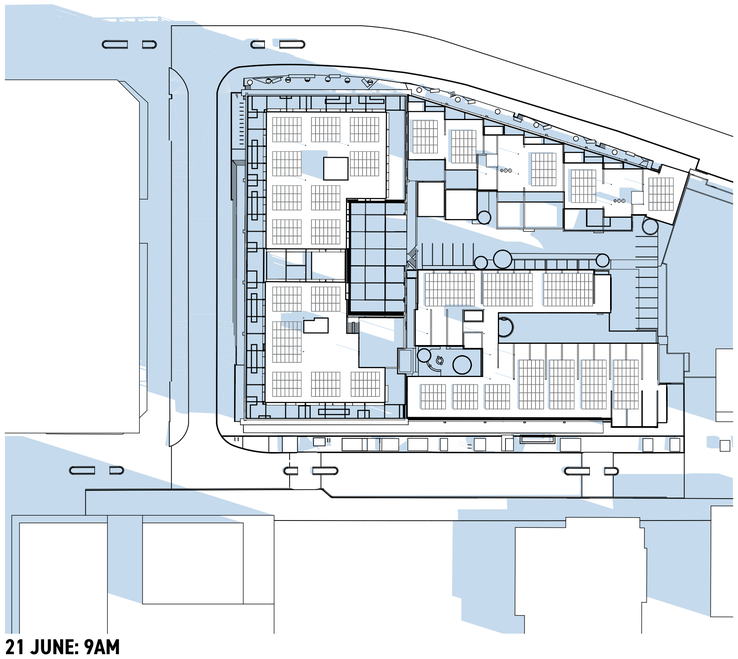
21 MARCH : 9AM



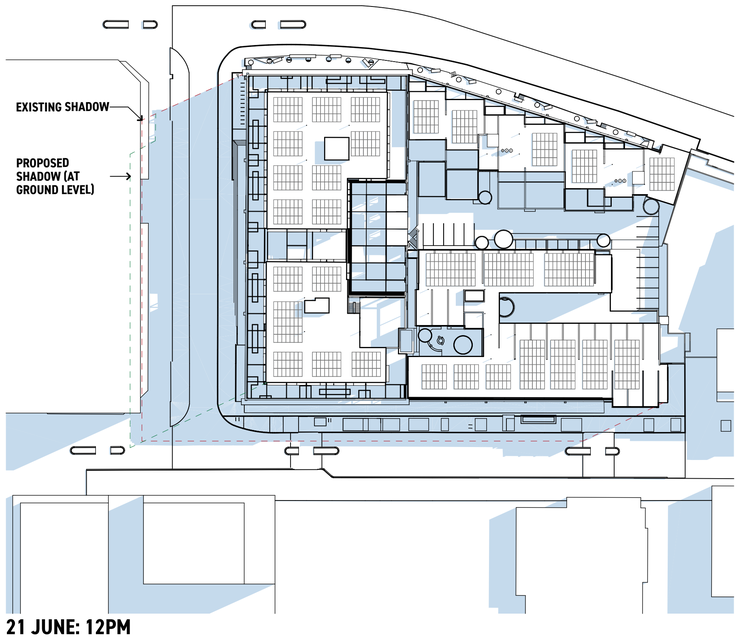
21 MARCH : 12PM



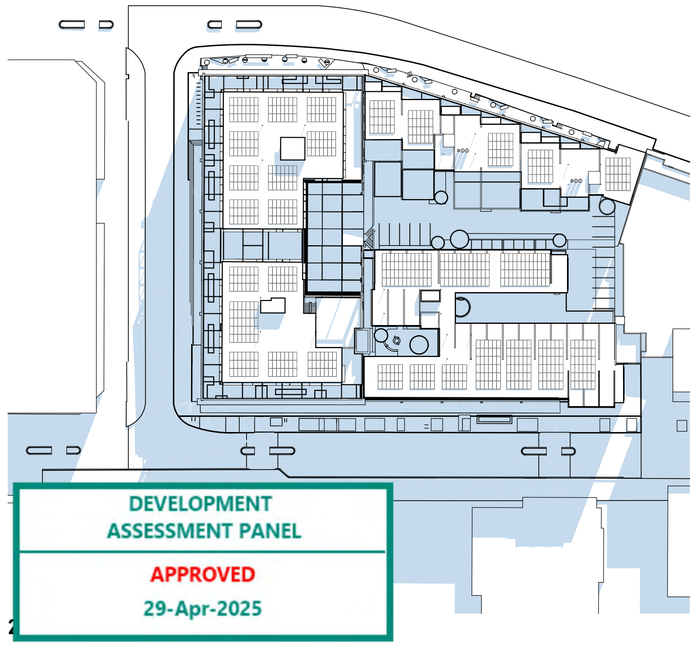
21 MARCH : 3PM



21 JUNE: 9AM



21 JUNE: 12PM



DEVELOPMENT ASSESSMENT PANEL
APPROVED
29-Apr-2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

N

ID	DESCRIPTION	DATE
B	ISSUED FOR DA	20/12/2024
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

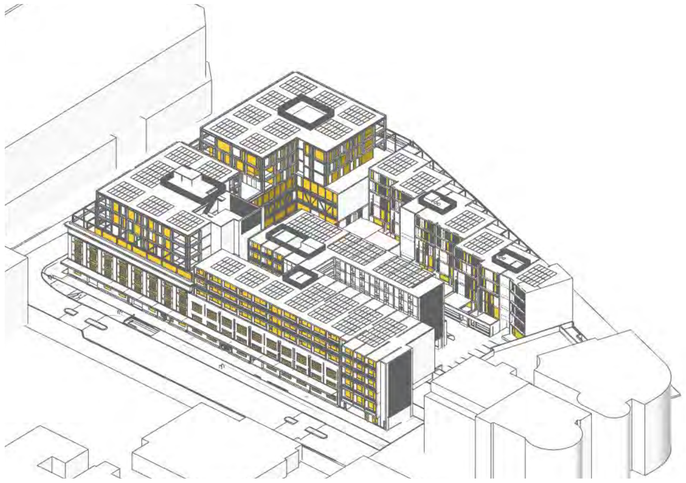
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
SHADOW STUDY

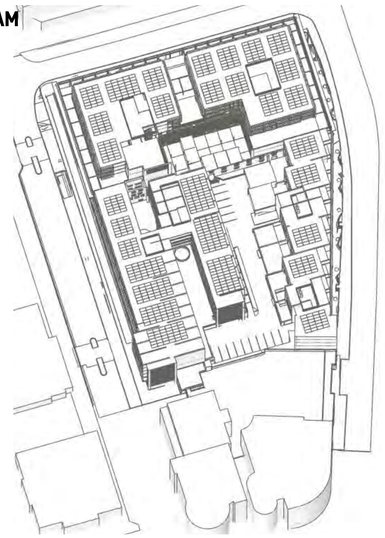
PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE 1:750 @A1

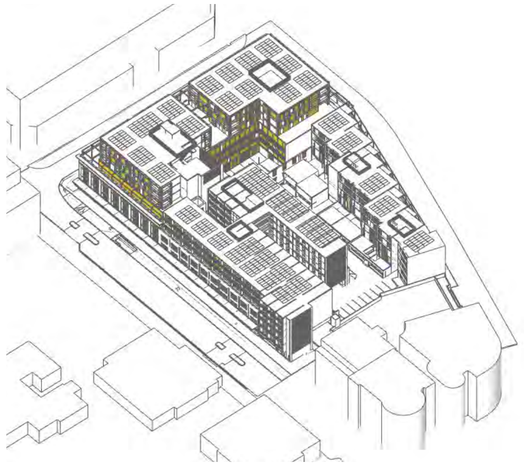
PROJECT NO	DRAWING NO	REVISION
2204	DA401	B



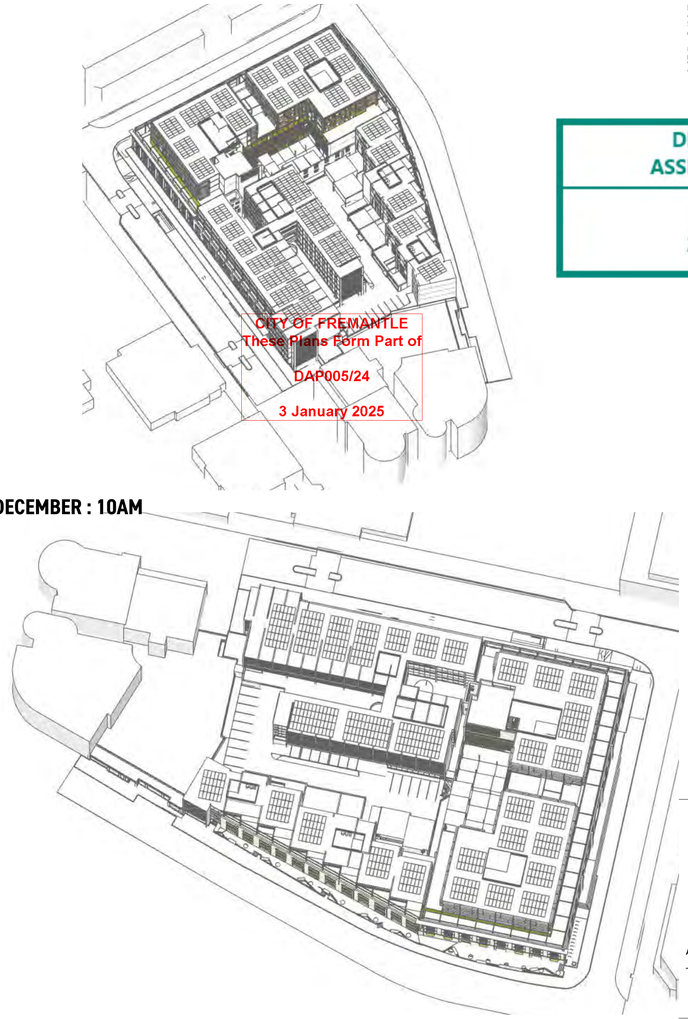
21 DECEMBER : 8AM



21 DECEMBER : 9AM



21 DECEMBER : 10AM



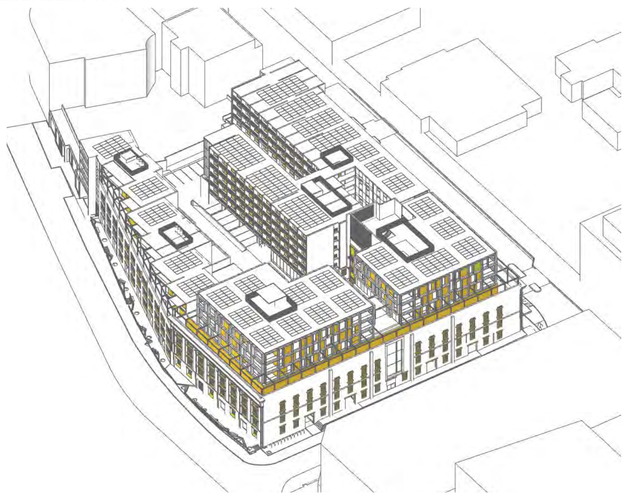
21 DECEMBER : 11AM



21 DECEMBER : 12PM



21 DECEMBER : 1PM



21 DECEMBER : 2PM

THIS DRAWING SHOWS THE SITE AS VIEWED FROM THE POSITION OF THE SUN

21 DECEMBER : 3PM

21 DECEMBER : 4PM

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propperty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

CITY OF FREMANTLE
These Plans Form Part of
DAP005/24
3 January 2025

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/202 4

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

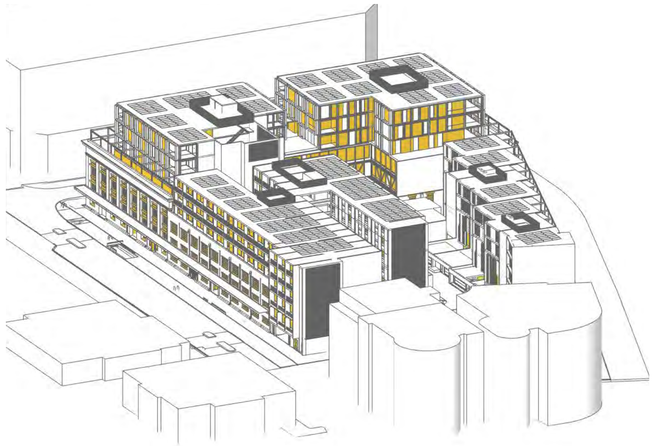
48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
SUN STUDY - SUMMER

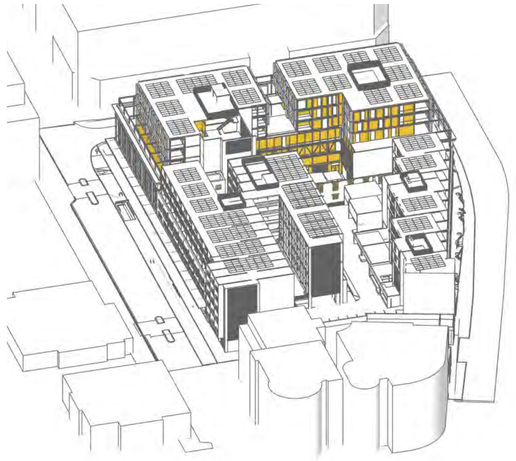
PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE @A1

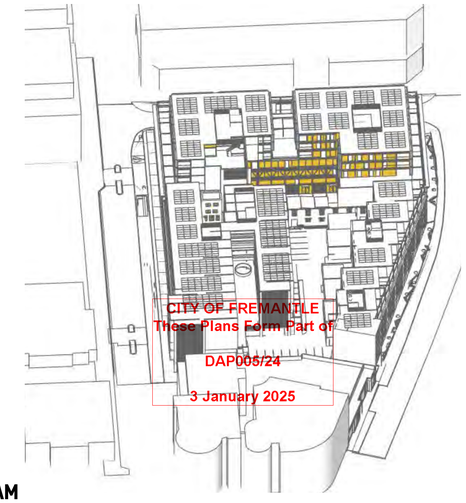
PROJECT NO	DRAWING NO	REVISION
2204	DA402	A



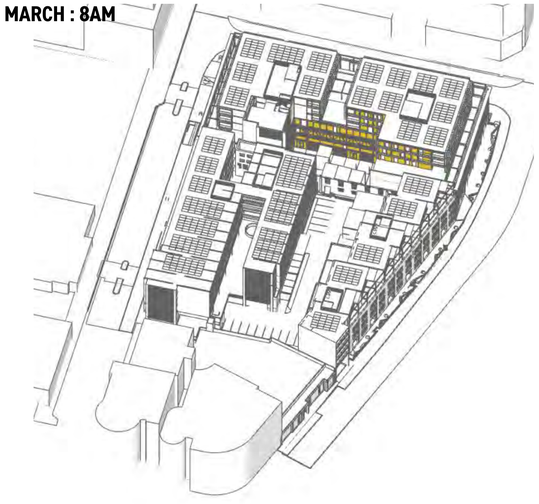
21 MARCH : 8AM



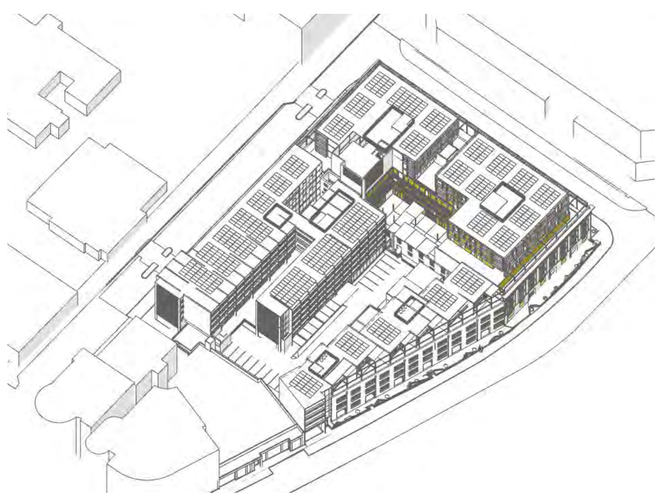
21 MARCH : 9AM



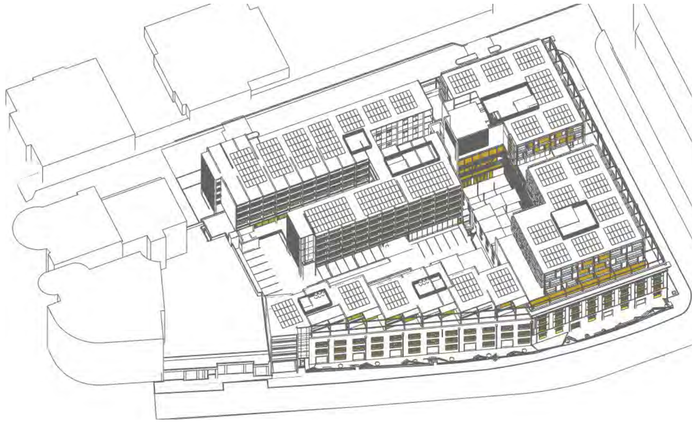
21 MARCH : 10AM



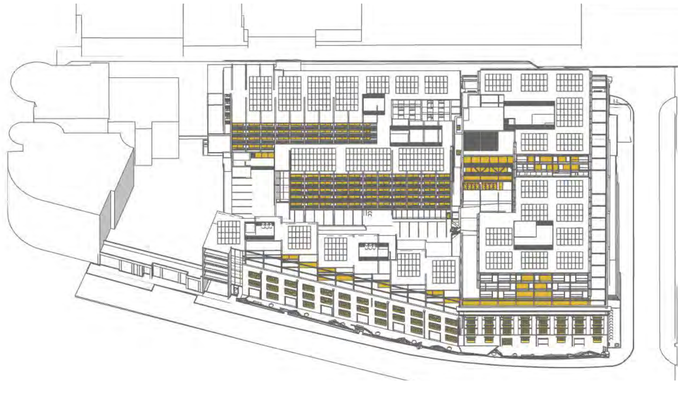
21 MARCH : 11AM



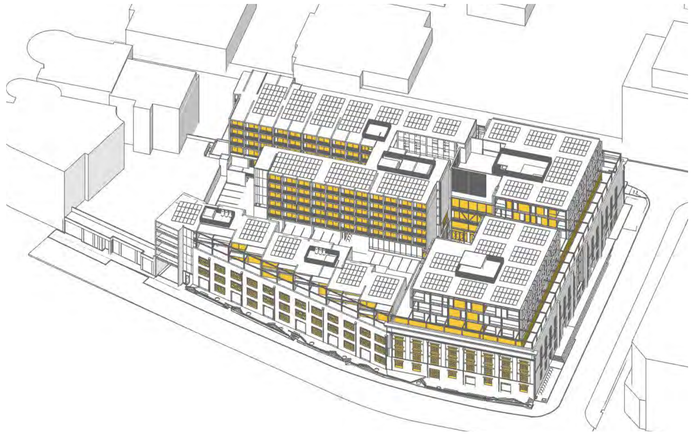
21 MARCH : 12PM



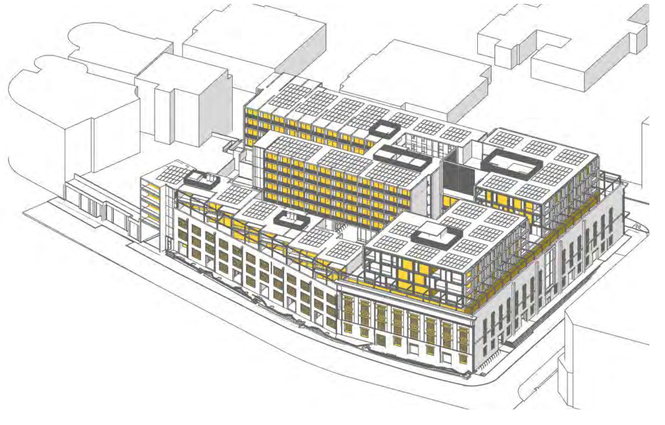
21 MARCH : 1PM



21 MARCH : 2PM



21 MARCH : 3PM



21 MARCH : 4PM

THIS DRAWING SHOWS THE SITE AS VIEWED FROM THE POSITION OF THE SUN

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the propoerty of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

CITY OF FREMANTLE
These Plans Form Part of

DAP005/24

3 January 2025

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
SUN STUDY - EQUINOX

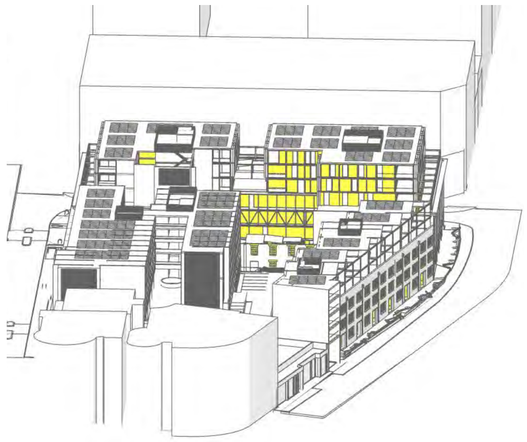
PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE @A1

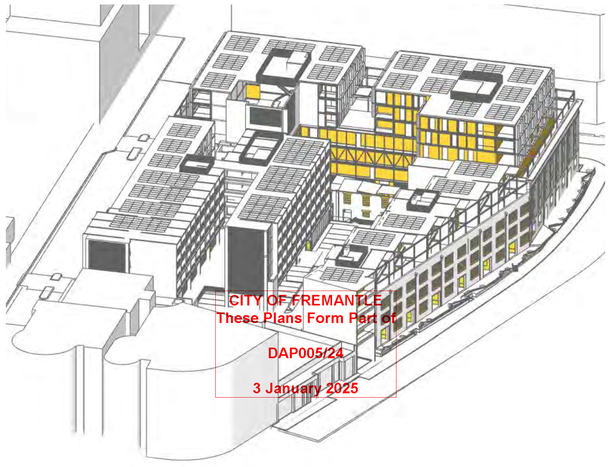
PROJECT NO	DRAWING NO	REVISION
2204	DA403	A



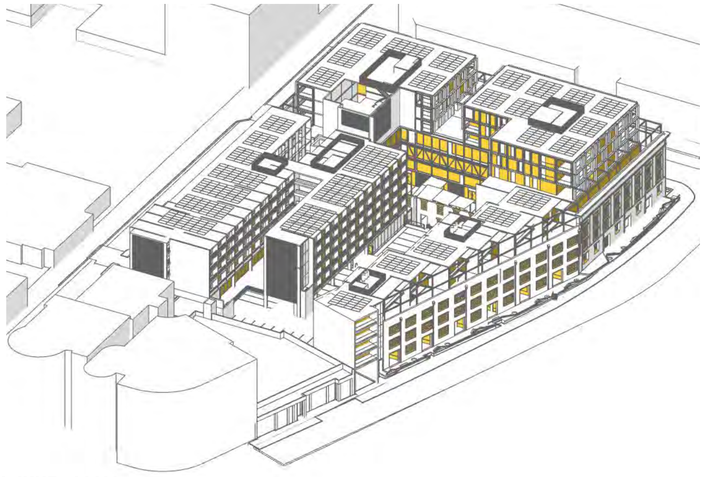
21 JUNE : 8AM



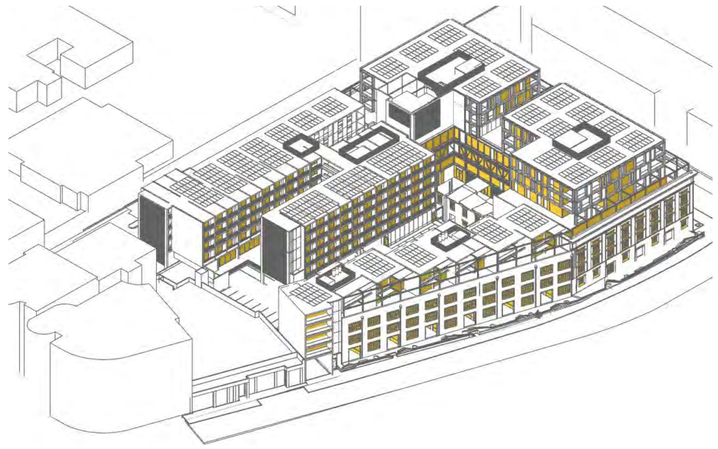
21 JUNE : 9AM



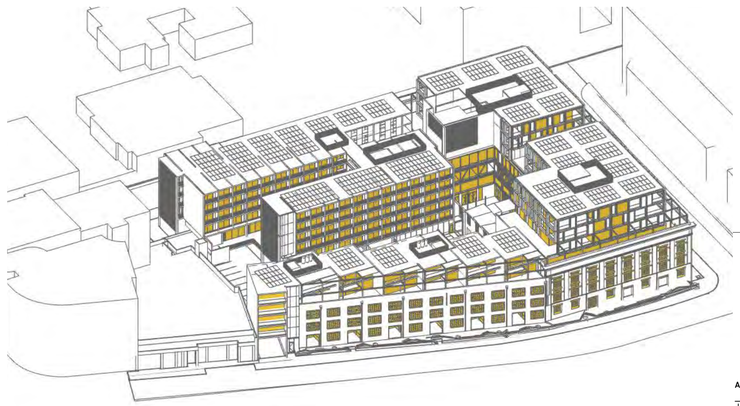
21 JUNE : 10AM



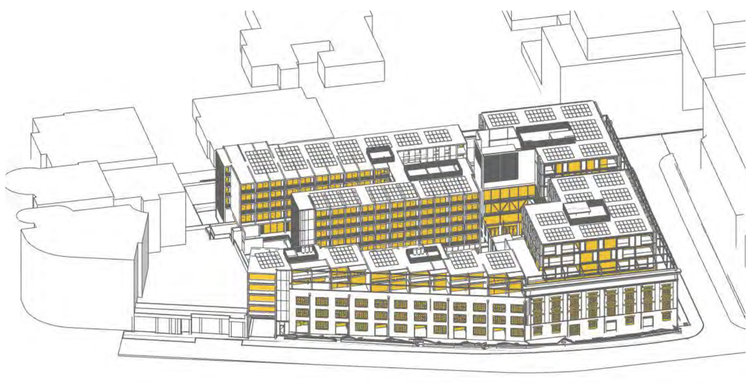
21 JUNE : 11AM



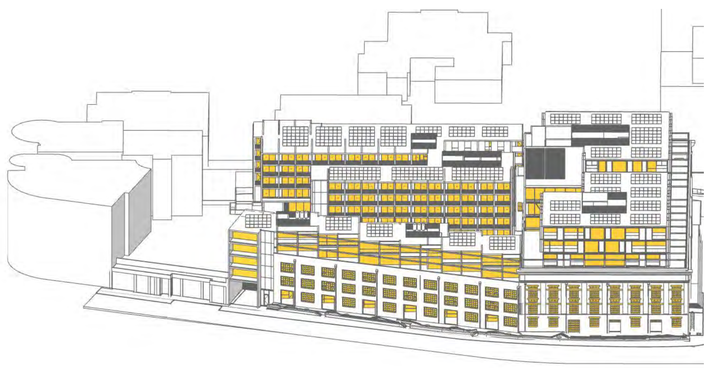
21 JUNE : 12PM



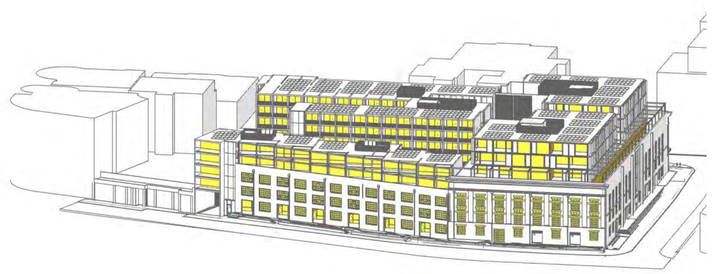
21 JUNE : 1PM



21 JUNE : 2PM



21 JUNE : 3PM



21 JUNE : 4PM

THIS DRAWING SHOWS THE SITE AS VIEWED FROM THE POSITION OF THE SUN

CITY OF FREMANTLE
These Plans Form Part of

DAP005/24

3 January 2025

DISCLAIMER
1. Do not scale drawings. Written dimensions govern.
2. All dimensions are in millimeters unless otherwise noted.
3. Check all site levels and existing dimensions prior to proceeding with work.
4. Report any discrepancies to spaceafency in writing.
5. This drawing must be read in conjunction with all relevant contracts, reports, specifications and drawings.

Drawing © spaceagency architects, 2021. This design and drawing remains the property of spaceagency. It may not be used for any purpose without the express written permission of spaceagency. Any unauthorised changes to this design constitutes an infringement of copyright.

ID	DESCRIPTION	DATE
A	ISSUED FOR DA	16/12/2024

DEVELOPMENT ASSESSMENT PANEL

APPROVED

29-Apr-2025

spaceagency

PO BOX 48, NORTH FREMANTLE 6159
WESTERN AUSTRALIA
t 08 94305450 e STUDIO@SPACEAGENCY.COM.AU

CLIENT
HUMAN - URBAN

H–U

PROJECT
WOOL STORES

48 - 68 CANTONMENT STREET FREMANTLE

DRAWING
SUN STUDY - WINTER

PROJECT STATUS
DEVELOPMENT APPROVAL

SCALE @A1

PROJECT NO	DRAWING NO	REVISION
2204	DA404	A

URBIS

LEVEL 8
1 WILLIAM STREET
PERTH WA 6000

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

10 July 2025

Chief Executive Officer
City of Fremantle
Walyalup Civic Centre,
151 High Street,
FREMANTLE WA 6160

Attention: Chloe Johnson – Manager, Planning Services

Dear Chloe

REDEVELOPMENT OF ELDERS WOOLSTORE - DAP/25/02837 - REGULATION 17 APPLICATION FOR AMENDMENT OF DEVELOPMENT APPROVAL (REMOVAL OF CONDITION 38)

On behalf of our client, Human-Urban (**H-U**), Urbis is pleased to submit this application to amend development approval (DAP Ref: DAP/25/02837) relating to the Elders Wool Stores Redevelopment (**Elders**) at Lot 201 (No. 1) Goldsbrough Street and Lot 40 (No. 48-68) Cantonment Street, Fremantle.

The application proposes a comprehensive adaptive re-use and redevelopment of the Elders building including 174x co-living units, 33x build to sell apartments, 6x 3-level townhouses, 3x levels of commercial office space and a variety of ground floor tenancies providing opportunities for a range of retail and hospitality opportunities. Conditional development approval was granted by the Inner Metropolitan Development Assessment Panel (**DAP**) on the 29 April 2025.

The proposal, including the design, heritage outcome and engagement process, has been widely praised by the City of Fremantle, Heritage Council of WA (**HCWA**) and the broader community. It represents a viable outcome which retains the maximum amount of heritage fabric, while balancing the modern needs of mixed-use developments, to produce an outstanding architectural and heritage outcome. In particular, it navigates and balances a number of complex elements to produce a cohesive, mixed-use precinct that accommodates sub-cultural activity (skateboarding) while promoting hospitality and retail offerings to align with the aspirations of the City of Fremantle-led 'Cantonment Street Precinct' project.

H-U is eager to advance this development, with detailed design and tenancy leasing negotiations well-underway. To ensure the project is feasible and delivers the best quality outcome from a heritage conservation, built form and activation perspective, this application seeks support for the removal of Condition 38. Condition 38 requires a re-design to remove a reinstated heritage doorway and negate removal of just 1.6m of the skate ledge (for the purpose of the doorway access only) in addition to sealing off another 3m x 3.7m (~13m2) original building accessway on Cantonment Street with fixed glazing.

It is our firm view that Condition 38 is entirely unsuitable and compromises the vision and aspirations for the Elders proposal and the broader Cantonment Street precinct This application therefore seeks removal of this condition in its entirety for the following reasons:

- **The planning basis and validity of the Condition 38 is challenged. Neither the HCWA's heritage assessment, City of Fremantle assessment nor the 2014 (or 2024) Griffiths Architects assessment mention the ledge or its function as a skateboard facility. It does not form part of any of the elements of significance. While H-U has actively sought to engage and retain as much of the ledge as possible in recognising its sub-cultural importance, there is no strict heritage requirement for this, and its full retention compromises the activation outcome being sought.**
- **Development approvals cannot be issued on the basis of re-design. Closing off external access to these tenancies will require comprehensive reconsideration and redesign of the internal and external access arrangements into the site and will completely undermine and compromise the integrity of the design, including the extent of heritage retention and the adaptive reuse outcome.**
- **The proposal has and continues to maintain ~85% of the skateable portion of the ledge on Cantonment Street which is an exceptional outcome for the skate community. This was informed by considerable engagement with the WA Skateboarding Association and local community and presents a balanced and exceptional outcome for the site, allowing the skateboard and new uses to co-exist in a managed way.**
- **The proposal seeks to modify just 5.5 meters (or 6%) of the existing skate ledge. Of this, the area affected by Condition 38 relates to only 1.6 meters of the total, which allows the only original heritage pedestrian doorway to be reinstated – refer to Attachment B.**
- **Considering the existing 'breaks' in the ledge which exist today (prior to any modification) and the proposal, the minimum length of any single part of the skate ledge is 6 meters long, with the maximum uninterrupted length of the ledge being 25 meters. The area affected by Condition 38 is proposed to have a 7 meters projection to the south, and a 17-meter projection to the north, well above and at the very least, commensurate with the existing condition and entirely appropriate for the heritage and activation benefits.**
- **The condition will completely sever a critical interface between the development and the public domain which contradicts the scope and aspiration of the 'Cantonment Street Precinct' project – a City-led (and private partnership) initiative which seeks to enhance public infrastructure and activation on this frontage, as well as improve integration with adjoining land uses.**
- **Based on survey footage, the actual use of the skate ledge is minimal. On average, the ledge attracts 3 users per day (with 23% of surveyed days recording no users at all) with average use being 90 minutes (equating to less than 10% of potential trading hours as part of the future Elders development or just 6% within a 24-hour period). If Condition 38 was to remain, it will result in an inactive space for 90%+ of the potential trading hours of the tenancies, leading to poor urban design outcomes and potential safety/CPTED issues.**
- **The closure of the proposed reinstated heritage doorways undermines the adaptive reuse of the building and contradicts best practice heritage principles. Recovering and reconstructing these doorways is an integral part of the conservation outcome being sought which will honour the historical façade and original rhythm of the development. Condition 38 is not supported by Griffiths Architects or HCWA. It should also be**

highlighted that the ledge was originally constructed for practical reasons, which was later utilised for skateboarding.

- **The City of Fremantle Officers were not consulted in relation to this condition and do not support it.**

It is for these reasons we are seeking for the removal of Condition 38 in its entirety. This application provides further justification and detail to demonstrate the merit of this request.

It is requested the proposed application be considered under *Regulation 17 of the Planning and Development (Development Assessment Panels) Regulations 2011*. The City's prompt assessment is essential to ensure that development can commence as soon as possible and be completed within the earliest possible timeframe. This application includes:

- Completed City of Fremantle Application for Development Approval Form
- Completed DAP Form 2
- Letter of Landowner Consent
- Heritage Technical Note (prepared by Griffiths Architects) at **Attachment A**
- Cantonment Street Elevation at **Attachment B**

CONDITION 38 CONTEXT

The approval of the Elders Wool Stores redevelopment followed a highly positive process of engagement both with the City of Fremantle Officers, Elected Members, agencies and the local community. Ultimately, a recommendation of approval was presented to the DAP which was carried at the DAP meeting on the 29 April 2025. While some recommended conditions were removed at the Applicants request, Condition 38, which relates to the full retention of the skate ledge and restricting of building openings, was ultimately carried.

The imposition of Condition 38 was instigated through the City of Fremantle Elected Member consideration of the proposal, prior to the finalisation of the Responsible Authority Report (**RAR**) by the City of Fremantle, and DAP consideration.

As part of Council's decision-making process, a proposed alternative motion by Mayor Fitzhardinge was presented which supported the alternative officer recommendation for approval, however recommended an additional condition (now Condition 38) be imposed. It should be noted that when this additional condition was put to a vote at the Council Meeting, the decision was split (5/5) and the Mayor casted the deciding vote to carry it through to the RAR for presentation to the DAP. Condition 38 was not recommended by the City of Fremantle Officers.

At the DAP meeting on 29 April 2025, Condition 38 was discussed and debated for some time, including consideration of alternative wording to provide additional flexibility for resolution post-approval. However, ultimately Condition 38 was carried, and forms part of the current development approval. The condition reads as follows:

> *38. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:*
>
> - *Replacement of the glazed doors for the southernmost F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.*
> - *Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.*

The reason for Condition 38 is cited as *'to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies'.*

In parallel with the development, H-U has been working closely with the City of Fremantle and other private landowners to align and coordinate landscaping and urban streetscape regeneration with the adjacent City infrastructure along particularly Cantonment and Goldsbrough Streets, referenced as 'Cantonment Street Precinct' project.

As part of this initiative, H-U, the City and key stakeholders have discussed opportunities for upgrades to the street infrastructure through future City of Fremantle budget allocation as well as private funds (including utilisation of the projects public art contribution amount). H-U is committed to continuing to work with the City to deliver on this important project.

REQUESTED REMOVAL OF CONDITION NO. 38

Condition 38, which requires preparation of a revised plan to remove the reinstatement of heritage doorways and retain full extent of the skate ledge, is inappropriate, contradicts all the positive engagement held to date and conflicts with the primary aim of achieving the best heritage and activation outcome for this project.

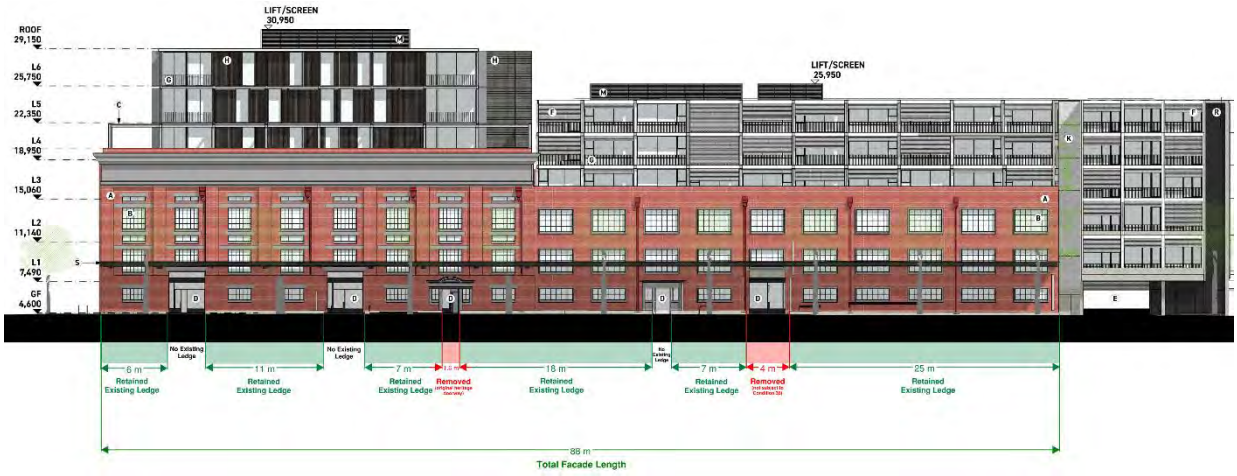
On this basis, it is requested Condition 38 be removed in its entirely, for the following reasons:

Design Rationale and Validity of Condition

The Project Team has worked hard to meaningfully retain as much as of the skate ledge as possible and ensure as much space around the ledge remains, all of which is located within the private boundaries of the subject site and not a specific development control, heritage or planning requirement.

This has resulted in the proposal maintaining ~85% of the skateable portion of the ledge on Cantonment Street which is an exceptional outcome for the skate community. Again, it should be noted that the level of intervention relating to Condition 38 is the removal of **just 1.6m of existing structure, representing 1.8% of the total retained heritage façade** on Cantonment Street (refer **Figure 1** below and **Attachment A**).

Figure 1 - Cantonment Street Elevation



Further, the reinstatement of the two heritage doorways will not only honour the historical façade and original architectural rhythm of Elders but also enables direct pedestrian access and activation of the proposed food, beverage and commercial tenancies.

The proposed design, while incorporating a minor break in the skateable ledge of only 1.6m, allows for the opening of two original heritage doorways and accessways along Cantonment Street. This not only honours the historical façade and original architectural rhythm but also enables direct pedestrian access and activation of the proposed food and beverage tenancies. This approach is consistent with heritage best-practice principles and directly supports the City's vision for improving public realm outcomes along Cantonment Street.

Given the considerable complexity in the design approach and the fine balance that has been achieved to enable the mix of uses and activities, the condition is considered invalid. This condition has broad design implications that complicate the entire access strategy and has the potential to compromise a range of other outcomes including the extent of heritage retention. Arguably these resulting impacts would not be supported by HCWA, the City of Fremantle and potentially DAP, and therefore a condition which leads to such a compromise, without a proper understanding of these impacts, is unacceptable.

Impact on Activity, Safety and Viability of Tenancies

Condition 38 will significantly impact on the safety outcomes for the development as well as the viability of the Cantonment Street tenancies. In two out of the three food and beverage/retail developments, the proposed doorways provide the only access into the development. Alternative access points are considered to be inappropriate for use by these tenancies due to potential conflicts with the residential and office uses in the development. Utilisation of the original access ways into the building is entirely logical and appropriate, and the proposed haphazard closing off of these points is considered (and will be experienced as) an odd sequence of function, architecture and aesthetics.

The condition will significantly impact the commercial viability and leasing potential of the ground-floor tenancies, many of which rely on clear street-facing access and exposure. In doing so, it would inhibit active street frontage and compromise broader placemaking and pedestrian connectivity objectives for the precinct. Since the carrying of Condition 38, H-U has received considerable negative feedback through its active leasing campaign from potential tenants and operators, regarding the lack of street front activation.

At present, the only public establishments contributing to activity in this area are Clancy's Fish Pub and the Fremantle Education Centre, and without comparable activation on the western side of Cantonment Street, the aspirations for this street will not be met. Enhancing activity along this street will promote passive surveillance and foster a sense of safety around the development that would otherwise continue to be absent.

Safety for all users of the site, including skaters, tenants, and visitors, have been a priority throughout the design process. The placement of historical doorways a significant portion of the skate ledge to remain skateable. To prevent conflicts between skaters and visitors, adequate space has been ensured between the openings and the skate ledge, reducing safety risks. Additionally, upgrades to Cantonment Street are being implemented to activate the area. These improvements will ensure the street remains balanced between activation and public realm outcomes. There will also be a focus on reducing conflicts between existing and new users.

Management of Uses

Skate-aligned tenants have been carefully considered for the food and beverage/retail spaces to ensure harmonious coexistence between tenants and the cultural history of the site. This approach will minimise potential conflicts, as tenants are likely to share the enthusiasm for its functionality. Further, this strategy is expected to attract a demographic of visitors who are skaters themselves, thereby reducing the likelihood of complaints about skaters utilising the site.

H-U through its community engagement has purposefully designed any street activation to include limited fixed elements directly abutting the building and continues to work closely with the City of Fremantle and community on the wider streetscape vision. This has included a re-design, with the support of the WA Skateboarding Association, of the privately owned land directly adjacent the skate ledge, to provide significant footpath and accessway widths, supporting H-U's commitment to the balanced approach of all users.

Community Engagement

H-U has undertaken an organic community engagement process since acquiring the site which has directly influenced the proposal vision and design. Engagement with the WA Skateboarding Association (**WASA**) and skaters who frequent the skate ledge began over two years ago and the positive working relationship remains today.

WASA and local skaters communicated a strong desire for the ledge to remain as part of the site's redevelopment, resulting in the final proposal retaining a significant portion of the ledge (again, approximately ~85% of the skateable portion). Areas of intervention are required to re-instate the original building openings and to provide vehicular and pedestrian access however on balance, this is considered to be an exceptional outcome which sensitively balances community feedback with heritage restoration and activation principles.

WASA has publicly confirmed its support of the design outcome as follows:

> *'…incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders…H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site..."*
>
> *…their collaborative approach and continued willingness to work openly and honestly with (the) WASA have paved the way for a bright future for generations of Western Australian skateboarders to come...'.*

The skateboarding community has been considered at every step of the design process to ensure a cohesive mix of uses, including skating, along Cantonment Street. The design has been conceived around the existing openings to the building, and existing 'breaks' in the ledge to maximise the level of retention whilst striking a balance between new, modern uses for a 40-year derelict site in the Fremantle CBD.

These efforts reflect a genuine commitment to fostering a cohesive, mixed-use precinct that accommodates sub-cultural activity, alongside more formal hospitality and retail offerings. Ensuring the flexibility to reinstate these proposed openings is essential to delivering this outcome, ensuring Cantonment Street evolves as a lively, inclusive and accessible streetscape.

Heritage Merit

The proposal seeks to retain as much heritage fabric within both the 1927 and 1950s building as possible, most notably the entire heritage facade in order to maintain the buildings' iconic landmark presence. The reinstatement of these doorways on Cantonment Street will ensure that the development continues to be a significant industrial architectural and urban contributor to Fremantle's broader cultural heritage and local character.

The most historic architecturally detailed facade is that facing Cantonment Street, which includes a number of finely detailed doorways (refer historical image from c.1938 at **Figure 2**). From a conservation and heritage perspective, recovering and reconstructing these doorways is an integral part of recovering the original building's design and presentation. These doorways honour the historical façade and original rhythm of the development, creating a cohesive heritage outcome for the development.

The skate ledge is a late utilitarian and intrusive addition to the 1927 building that detracts from the building's presentation. Condition 38 restricts access and uses adjacent to the ledge and therefore complicates an important heritage outcome. In reality, from a heritage perspective, retaining the full extent of the ledge across the doorways in the 1927 building would appear odd and misses an important heritage and architectural opportunity.

Further, Condition 38 excluded any engagement with heritage professionals, including HCWA, the City of Fremantle Heritage team and Griffiths Architects. Given the heritage context above, this is considered to be problematic and based on engagement with the City of Fremantle and DPLH since approval, there is collective opposition to the condition in the context of its considerable impact on achieving heritage, activation and viability outcomes.

A technical note prepared by Griffiths Architects, outlining the heritage merit in the removal of Condition 38, is provided at **Attachment A.**

Actual Use of the Existing Skate Ledge

While H-U recognises the importance of the local skate culture which is reflected in the engagement process and design outcome for Cantonment Street, the realistic use of the skate ledge is minimal. To gather records on the actual use of the ledge as well as to ensure the security of the site, H-U has undertaken ongoing survey monitoring of Cantonment Street. From 2 May to 10 June 2025, the survey confirmed the following usage of the ledge:

- On average, the ledge attracts 3 users per day.
- The average use of the ledge per day is 90 minutes (which would equate to less than 10% of potential trading hours as part of the future Elders development).
- Not a single user was recorded on 23% of the surveyed days.
- Four or less users were recorded on 83% of the surveyed days

Condition 38 will compromise the developments activation and access outcomes on the basis of current minimal skating utilisation, which reflects under 10% of the trading hours of the future tenancies. This is not considered a commensurate or balanced outcome.

Figure 2 - Cantonment Street Elevation – c. 1938



PLANNING CONTEXT

The proposed development remains consistent with the existing development approval as presented in the development application originally lodged (dated December 2024) and the therefore remains consistent with the standards that apply to the subject site under the planning framework and the level of compliance. Consequently, no further assessment of the proposal against the broader planning framework has been undertaken.

It is noted however that the **Draft Fremantle City Plan: City Centre** (**Draft City Plan**) and **Draft Local Planning Strategy** have both been released for comment since the development approval. The Draft City Plan reflects a strategic urban design and planning process which guides Fremantle's growth toward a diverse, liveable and sustainable future, focusing on key precincts for regeneration, with the Draft Local Planning Strategy setting out the long-term planning direction for the City.

The following elements presented in these documents support the removal of Condition 38:

- Unlocking potential - Cantonment Street is identified in the Draft City Plan as being a priority site for unlocking potential, noting it has remained vacant, neglected and underutilised for years. Contributing factors to this has been land banking and aging infrastructure – both of which may be further compromised as a result of imposing Condition 38, due to potential impacts on project viability and the success if the Cantonment Street Precinct Project.
- 7-Day Economy – attracting more residents, businesses and visitors to stimulate economic growth and enhance overall urban vibrancy is outlined as a priority. The reinvigoration and enhancement of the Cantonment Street public realm is identified as a considerable priority to reflect the significant proposed private investment.
- Activating the Edges – the Draft City Plan highlights the importance of activating the edges to create a 'thriving city', noting Cantonment Street as an area of focus. It notes Cantonment Street as a focus for mixed use commercial and residential development, with the City's role to coordinate projects and organise infrastructure investment.
- Cantonment Street – the Draft City Plan notes that the area is expected to accommodate 1,000 to 2,000 new residents in the next 5-10 years. To support this growth, public realm, urban amenities and recreational infrastructure will require enhancement. **Figure 3** below is an extract from the Draft City Plan illustrating the aspirations, which note an activated Wool Stores building. This activation is reliant on pedestrian footfall and access to the proposed tenancies.

Figure 3 – Extract from Draft Fremantle City Plan



Artist impression

- Strategic Importance – the Fremantle CBD is identified as an 'Activity Centre – Strategic' under the Draft Planning Strategy, identifying it as a key driver of economic growth. The focus is on boosting employment opportunities, fostering a resilient 7-day economy, diversifying land use, and increasing residential density. This condition could impede the full realisation of the site's strategic importance in line with the Draft Strategy (and its identification as a key priority area for revitalisation) given the impact it will have on the viability, vitality and activation of this important street.

As presented above, the Draft City Plan and Draft Local Planning Strategy both clearly advocate for an enhanced public realm on Cantonment Street to deliver a more pedestrian-friendly, safe and activated environment. While the retention of the skate culture is an important element of this, it needs to co-exist with the broader aspirations for this development and Cantonment Street Precinct.

CONCLUSION

This application demonstrates the considerable merit in the removal of Condition 38, which in summary relates to the following:

- The condition is invalid in that it requires broader design review which will negatively impact on the overall urban design outcome.
- The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA.
- The condition will significantly impact on the tenancy viability and compromise activation and safety outcomes in the area.
- The actual use of the existing skate ledge is considered minimal and not commensurate to the benefit the Elders proposal (and new activated tenancies on Cantonment Street) will deliver.
- The proposal to maintain ~85% of the ledge is an excellent outcome which WASA has publicly supported.
- The management of skaters and proposed tenancies will ensure the uses can co-exist in a safe manner.
- Condition 38 conflicts with the City's Draft City Plan and Draft Local Planning Strategy in that it will conflict with the activation and regeneration outcomes being sought.

We look forward to working with the City towards a favourable determination by the Development Assessment Panel. If you have any questions or require any further information, please do not hesitate to contact the undersigned.

Yours faithfully,



Megan Gammon
Director
mgammon@urbis.com.au

URBIS

ATTACHMENT A – HERITAGE TECHNICAL NOTE (GRIFFITHS ARCHITECTS)

10 July 2025
Job Number: 24122
Our Reference: 01

Human Urban
G/338 Barker Road
Subiaco WA 6008

Attn: Corey Scidone corey@h-u.au

Griffiths Architects

Dear Corey,

ELDERS WOOLSTORES APPROVAL – REQUEST FOR REMOVAL OF CONDITION 38

I write in response to Condition 38 of the Inner Development Assessment Panel (**DAP**) approval dated 9 May 2025 for Elders Woolstores.

The development as a whole includes the 1927 woolstore designed by Talbot Hobbs. Hobbs was a prominent architect and soldier who designed many fine buildings, including some of the State's finest warehouses. Few have survived and this is one of the finest examples.

As part of Council's consideration of the Elders Wool Stores proposal, a Notice of Motion was put forward to support the proposal, albeit with a new condition that required full retention of the ledge which has latterly become skateboard site.

As part of the proposal's approval, the DAP ultimately adopted the City of Fremantle's Condition 38 that restricts operable door and accessways and maintains a portion of the concrete ledge along Cantonment Street under the original stucco designed pedestrian doorway.

Retention of the ledge was lobbied for by skateboarders, notwithstanding the originally submitted proposal sought to maintain most (~85%) of the existing ledge, regardless of Condition 38's additional restrictions.

Heritage Outcome

The 1927 section of the Elders Wool Stores complex was assessed by the Heritage Council of Western Australia and eventually included in the State Register of Heritage Places. The remainder of the Woolstores were not included.

Architecture
Heritage
Interiors

Griffiths Architects
ABN 28 678 339 743
Unit 1, 315 Rokeby Road, Subiaco
Western Australia 6008
Telephone 08 9381 1666
philip.griffiths@griffithsarchitects.com.au
www.griffithsarchitects.com.au

The project approach from the outset has been to achieve the conservation and adaptation of the 1927 building, the most important of the group. This is as it should be.

The most architecturally detailed facade is that facing Cantonment Street, which includes a number of finely detailed doorways. From a conservation and heritage perspective, recovering and reconstructing these doorways is an integral part of recovering the original building's design and presentation.

The ledge is a late utilitarian and intrusive addition to the 1927 building that detracts from the building's presentation. Condition 38 restricts access and uses adjacent to the ledge and therefore frustrates an important heritage outcome. Leaving the ledge in place across the doorways in the 1927 building would look odd and misses an important heritage and architectural opportunity.

The re-establishment of all original door openings is important from a heritage, architectural design, permeability and function perspective.

I strongly urge the requirement for full retention as expressed in Condition 38 to be set aside for this reason on its own.

Planning Basis for Ledge Retention

We cannot see the planning basis for Condition 38. Neither the Heritage Council's assessment nor the 2014 assessment relied upon for the Register and Scheme lists respectively, make any mention of the ledge or its function as a skateboard facility. It does not form part of any of the elements of significance. Further, the City's planning officers were not consulted in relation to the condition 38 and do not support it.

We would expect a requirement for retention to be based on an assessment of significance.

As there has been no formal recognition of the ledge or its significance it would seem that the condition is not relying on the planning principles of its scheme and supporting documents, such as the Heritage Register documentation and Scheme List documentation.

Therefore there is no heritage significance basis for consideration.

I would argue, as officers' reports indicated and decision-makers have expressed, Space Agency have produced an outstanding design solution for this place.

The design has to balance an enormous range of issues including architectural design, heritage conservation, access and street level activation. The design includes retention of ~85% of the ledge, which is an exceptional outcome, regardless of the heritage status of it.

I would argue that the condition should be set aside on these grounds also.

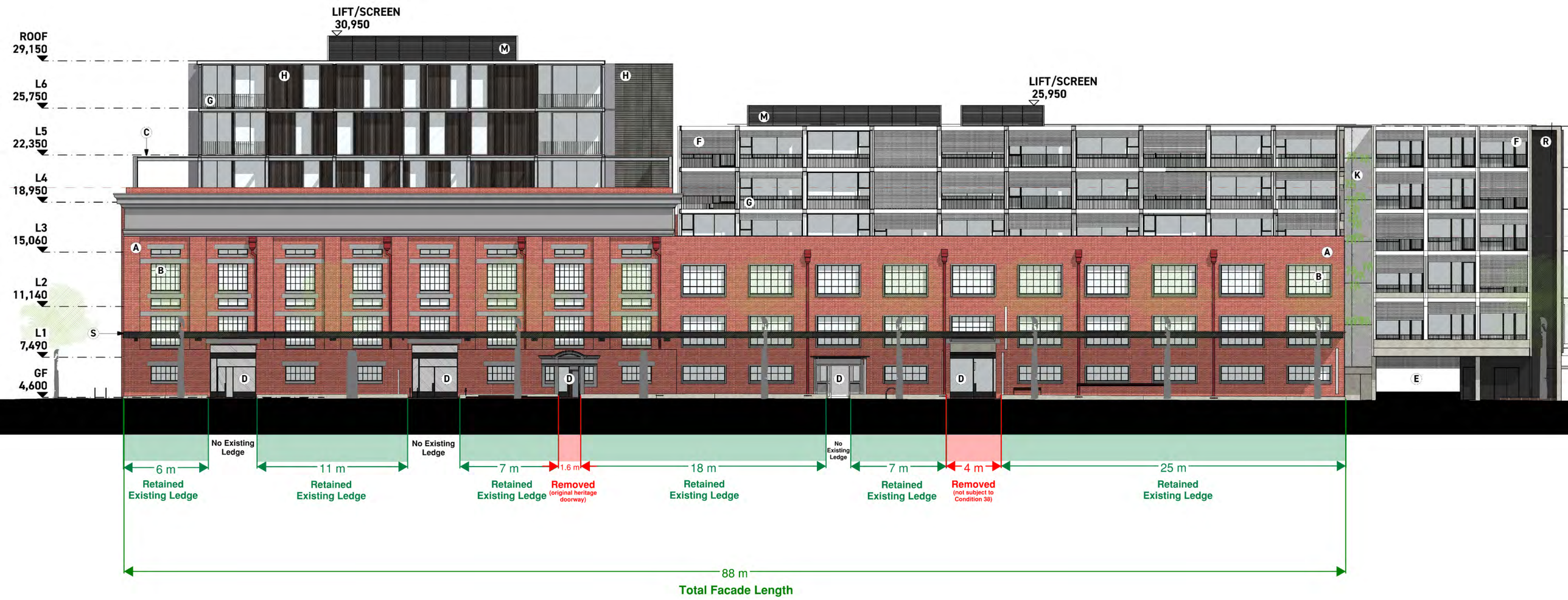
Please contact us if you have any queries.

Yours sincerely,



PHILIP GRIFFITHS FRAIA RIBA M.ICOMOS
ABWA Reg.No. 1071
for Griffiths Architects

ATTACHMENT B – CANTONMENT STREET ELEVATION


LIFT/SCREEN
30,950
ROOF
29,150
L6
25,750
L5
22,350
L4
18,950
L3
15,060
L2
11,140
L1
7,490
GF
4,600
LIFT/SCREEN
25,950
No Existing Ledge
No Existing Ledge
No Existing Ledge
6 m
Retained Existing Ledge
11 m
Retained Existing Ledge
7 m
Retained Existing Ledge
1.6 m
Removed (original heritage doorway)
18 m
Retained Existing Ledge
7 m
Retained Existing Ledge
4 m
Removed (not subject to Condition 38)
25 m
Retained Existing Ledge
88 m
Total Facade Length

- Urban development and public realm enhancement is coordinated, design-led, and sympathetic to surrounding natural environments.

Liveable City - A unique built heritage and history that is preserved, protected and shared

- Our built heritage is central to our character and sense of place, and is retained and protected for future generations to enjoy.
- Adaptive re-use of heritage buildings is enabled through supporting private investment, renewal and innovation.

Thriving City - A resilient seven-day economy

- A City with a diverse range of unique, resilient and sought-after businesses and attractions.

VOTING AND OTHER REQUIREMENTS

Simple Majority Required

OFFICER'S RECOMMENDATION

Council:

SUPPORT the Officer's Recommendation to REFUSE, under the Metropolitan Region Scheme and Local Planning Scheme No. 4, the Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop and Tavern Land Uses at No. 1 (Lot 201) Goldsbrough Street and Nos. 48-68 (Lot 40) Cantonment Street, Fremantle, as per the Responsible Authority Report.

In accordance with clause 9.7 of the Meeting Procedures Policy, Mayor Hannah Fitzhardinge moved the following alternative motion, along with the proposed amendment by Officers, as provided in the additional documents:

ALTERNATIVE MOTION

Moved: Mayor Hannah Fitzhardinge Seconded: Cr Jemima Williamson-Wong

Council:

SUPPORT the Alternative Officers Recommendation to APPROVE under the Metropolitan Region Scheme and Local Planning Scheme No. 4, the Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop and Tavern Land Uses at No. 1 (Lot 201) Goldsbrough Street and Nos. 48-68 (Lot 40) Cantonment Street,

Fremantle, as per the Responsible Authority Report with the following additional condition:

39. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

    - Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.
    - Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.

And amend conditions 12 and 21, to read as follows:

12. Prior to the lodgement of a building permit application for the works hereby approved, a traffic impact study addressing any need resulting from the development for the upgrading of the adjacent roads, including the location of access points to the on-site parking with particular attention to queuing, sight lines for exiting vehicles, weaving and gap analysis at the development's vehicle entries, being submitted and approved by *the* City of Fremantle~~'s Traffic Design Officer~~.

    The recommendations of the approved Plan are to be implemented at the developer's cost, prior to the occupation of building(s) *to the satisfaction of the City of Fremantle*.

21. Prior to the lodgement of a Building Permit application, an updated Waste Management Plan shall be prepared in accordance with advice from the City's ~~Waste Management Team Leader~~ and subsequently be submitted to, and approved by the City of Fremantle.

    Prior to the occupation of the development, the approved waste management plan must be implemented and adhered to at all times to the satisfaction of the City of Fremantle unless otherwise approved by the City of Fremantle.

In accordance with clause 9.7 of the Meeting Procedures Policy, Cr Ben Lawver moved the following amendment, as provided in the additional documents:

AMENDMENT 1

Moved: Cr Ben Lawver Seconded:

Amend Condition 11 of the Alternative Officers Recommendation to APPROVE under the Metropolitan Region Scheme and Local Planning Scheme No. 4, the Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop and Tavern Land Uses at No. 1 (Lot 201) Goldsbrough Street and Nos. 48-68 (Lot 40) Cantonment Street, Fremantle, as per the Responsible Authority Report, to read as follows:

11. *Prior to the submission of a Building Permit, the applicant is to submit detailed plans for the provision of three (3) loading/service bays within the ~~road reserves immediately adjacent the subject~~ development site for approval by the City of Fremantle.*

Prior to the occupation of the development hereby approved, the three (3) loading/service bays are to be constructed ~~in agreement with~~ to the satisfaction of the City of Fremantle. ~~All costs associated with the design and construction of the parking bays are to be borne by the landowner in full.~~

Lapsed due to no seconder

In accordance with clause 9.7 of the Meeting Procedures Policy, Cr Andrew Sullivan moved the following amendment, as provided in the additional documents:

AMENDMENT 2

Moved: Cr Andrew Sullivan Seconded: Cr Jemima Williamson-Wong

Amend the alternative motion, to include the following advice note:

1. *In relation to the contribution required for LPP 2.19 Contributions for Public Art and/or Heritage Works, the applicant is encouraged to continue working with the City of Fremantle, and are provided with the following guidance as to what is reasonable in complying with the policy:*

    - *The required contribution shall not be spent on general urban or streetscape improvement works.*

    - *The contribution must:*
        - *Include public art works for the purpose of providing public art within the locality or area of the development that are responsive to site and that draw on the cultural, social and*

historical context of place. These influences may include the existing skate culture and former wool trade for example; and/or

- *Include heritage interpretation works associated with the conservation, restoration or interpretation of proximate public buildings, structures or places of cultural heritage significance (for example – former schools at Princess May Park). This does not include the subject development site; and/or*
- *Provide funds to be accrued for public art projects led by the City of Fremantle.*

Amendment Carried: 9/1

For:

Mayor Hannah Fitzhardinge, Cr Jenny Archibald, Cr Geoff Graham, Cr Andrew Sullivan, Cr Jemima Williamson-Wong, Cr Fedele Camarda, Cr Ben Lawver, Cr Frank Mofflin and Cr Doug Thompson

Against:

Cr Ingrid van Dorssen

Reasons for amendment:

To provide clarity to the applicant regarding the City's expectations for the Public Art contribution.

In accordance with clause 9.4 of the Meeting Procedures Policy, Mayor Hannah Fitzhardinge allowed the Alternative Motion to be voted on in two parts:

COUNCIL DECISION ITEM C2504-1
(Amended alternative motion - Part 1)

Moved: Mayor Hannah Fitzhardinge Seconded: Cr Jemima Williamson-Wong

Council:

SUPPORT the Alternative Officers Recommendation to APPROVE under the Metropolitan Region Scheme and Local Planning Scheme No. 4, the Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop and Tavern Land Uses at No. 1 (Lot 201) Goldsbrough Street and Nos. 48-68 (Lot 40) Cantonment Street, Fremantle, as per the Responsible Authority Report.

And amend conditions 12 and 21, to read as follows:

12. Prior to the lodgement of a building permit application for the works

hereby approved, a traffic impact study addressing any need resulting from the development for the upgrading of the adjacent roads, including the location of access points to the on-site parking with particular attention to queuing, sight lines for exiting vehicles, weaving and gap analysis at the development's vehicle entries, being submitted and approved by *the* City of Fremantle.

The recommendations of the approved Plan are to be implemented at the developer's cost, prior to the occupation of building(s) *to the satisfaction of the City of Fremantle*.

21. Prior to the lodgement of a Building Permit application, an updated Waste Management Plan shall be prepared in accordance with advice from the City's and subsequently be submitted to, and approved by the City of Fremantle.

Prior to the occupation of the development, the approved waste management plan must be implemented and adhered to at all times to the satisfaction of the City of Fremantle unless otherwise approved by the City of Fremantle.

And include the following advice note:

1. *In relation to the contribution required for LPP 2.19 Contributions for Public Art and/or Heritage Works, the applicant is encouraged to continue working with the City of Fremantle, and are provided with the following guidance as to what is reasonable in complying with the policy:*

   - *The required contribution shall not be spent on general urban or streetscape improvement works.*

   - *The contribution must:*
     - *Include public art works for the purpose of providing public art within the locality or area of the development that are responsive to site and that draw on the cultural, social and historical context of place. These influences may include the existing skate culture and former wool trade for example; and/or*
     - *Include heritage interpretation works associated with the conservation, restoration or interpretation of proximate public buildings, structures or places of cultural heritage significance (for example – former schools at Princess May Park). This does not include the subject development site; and/or*
     - *Provide funds to be accrued for public art projects led by the City of Fremantle.*

Carried: 10/0
For:
Mayor Hannah Fitzhardinge, Cr Jenny Archibald, Cr Geoff Graham, Cr Andrew Sullivan, Cr Jemima Williamson-Wong, Cr Fedele Camarda, Cr Ben Lawver, Cr Frank Mofflin, Cr Doug Thompson and Cr Ingrid van Dorssen

Against:
Nil

COUNCIL DECISION ITEM C2504-1
(Amended alternative motion - Part 2)

Moved: Mayor Hannah Fitzhardinge Seconded: Cr Jemima Williamson-Wong

Council approve the following additional condition to the Alternative Motion:

39. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

- Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.
- Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.

Carried: 5/5
For:
Mayor Hannah Fitzhardinge, Cr Andrew Sullivan, Cr Jemima Williamson-Wong, Cr Ben Lawver and Cr Frank Mofflin

Against:
Cr Jenny Archibald, Cr Geoff Graham, Cr Fedele Camarda, Cr Doug Thompson and Cr Ingrid van Dorssen

Mayor Hannah Fitzhardinge used her casting vote FOR the motion resulting in it being CARRIED.

Reason for alternative motion:

The development proposed is a high-quality outcome for the site and the applicant's heritage assessment that the proposal satisfies the requirements of Clause 4.14 (Demolition) is accepted. An additional condition is requested to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential

conflict between skaters and people accessing the commercial tenancies. And; minor amendments to recommendations of conditions of approval in the Alternate Recommendation, to remove references to job titles.

COUNCIL DECISION ITEM C2504-1

Council:

SUPPORT the Alternative Officers Recommendation to APPROVE under the Metropolitan Region Scheme and Local Planning Scheme No. 4, the Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop and Tavern Land Uses at No. 1 (Lot 201) Goldsbrough Street and Nos. 48-68 (Lot 40) Cantonment Street, Fremantle, as per the Responsible Authority Report with the following additional condition:

39. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

    - Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.
    - Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.

And amend conditions 12 and 21, to read as follows:

12. Prior to the lodgement of a building permit application for the works hereby approved, a traffic impact study addressing any need resulting from the development for the upgrading of the adjacent roads, including the location of access points to the on-site parking with particular attention to queuing, sight lines for exiting vehicles, weaving and gap analysis at the development's vehicle entries, being submitted and approved by *the* City of Fremantle.

    The recommendations of the approved Plan are to be implemented at the developer's cost, prior to the occupation of building(s) *to the satisfaction of the City of Fremantle*.

21. Prior to the lodgement of a Building Permit application, an updated Waste Management Plan shall be prepared in accordance with advice from the City's and subsequently be submitted to, and approved by the City of Fremantle.

    Prior to the occupation of the development, the approved waste management plan must be implemented and adhered to at all times to the satisfaction of the City of Fremantle unless otherwise approved

by the City of Fremantle.

And include the following advice note:

1. *In relation to the contribution required for LPP 2.19 Contributions for Public Art and/or Heritage Works, the applicant is encouraged to continue working with the City of Fremantle, and are provided with the following guidance as to what is reasonable in complying with the policy:*

    - *The required contribution shall not be spent on general urban or streetscape improvement works.*

    - *The contribution must:*
        - *Include public art works for the purpose of providing public art within the locality or area of the development that are responsive to site and that draw on the cultural, social and historical context of place. These influences may include the existing skate culture and former wool trade for example; and/or*
        - *Include heritage interpretation works associated with the conservation, restoration or interpretation of proximate public buildings, structures or places of cultural heritage significance (for example – former schools at Princess May Park). This does not include the subject development site; and/or*
        - *Provide funds to be accrued for public art projects led by the City of Fremantle.*

Carried: 10/0

For:

Mayor Hannah Fitzhardinge, Cr Jenny Archibald, Cr Geoff Graham, Cr Andrew Sullivan, Cr Jemima Williamson-Wong, Cr Fedele Camarda, Cr Ben Lawver, Cr Frank Mofflin, Cr Doug Thompson and Cr Ingrid van Dorssen

Against:

Nil

	16. Former 2014 Heritage Assessment of Site 17. Applicant Further Information Request Responses (includes appendices) 18. Site photos 19. Public Submission Schedule

Officer Recommendation

That the Metro Inner DAP resolves to:

1. **Accept** that the DAP Application reference DAP/23/02354 is appropriate for consideration as "Multiple Dwelling", "Residential Building", "Office", "Restaurant/Café and "Tavern" land uses and compatible with the objectives of the zoning table in the City of Fremantle Local Planning Scheme No. 4

2. **Refuse** DAP Application reference DAP/25/023837 and accompanying plans DA002 (Rev A), DA003 (Rev A), DA004 (Rev A), DA101 (Rev A), DA102 (Rev C), DA0103 (Rev B), DA0104 (Rev B), DA0105 (Rev B), DA0106 (Rev B), DA0107 (Rev B), DA0108 (Rev B), DA0109 (Rev A), DA0201 (Rev A), DA202 (Rev A), DA301 (Rev A), DA302 (Rev A), dated 3 January 2025 (City of Fremantle received date)) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015, and the provisions of the City of Fremantle Local Planning Scheme No. 4, for the following reasons:

    1. The proposal involves the demolition of buildings or structures on the subject site which are deemed to hold at least some cultural heritage significance to the heritage places on the subject site and contribute to the broader cultural heritage significance and character of the locality in which it is located. As such, the proposal cannot be supported pursuant to clause 4.14.1 of Local Planning Scheme No.4 (LPS4).

Details: outline of development application

Region Scheme	Central City
Local Planning Scheme	City Centre Zone
Use Class and permissibility:	Multiple Dwelling (D); Residential Building (D); Restaurant/Café (D); Tavern (A) and Office (P).
Lot Size (effective):	8,466m^2 (per conditional subdivision approval WAPC161805)
Existing Land Use:	Vacant
State Heritage Register	Yes - *Elders Wool Stores, 38 Cantonment Street*
Local Heritage	☐ N/A ☒ Heritage List

Alternative Recommendation

That the Metro Inner JDAP resolves to:

1. **Accept** that the DAP Application reference DAP/23/02354 is appropriate for consideration as "Multiple Dwelling", "Residential Building", "Office", "Restaurant/Café and "Tavern" land uses and compatible with the objectives of the zoning table in the City of Fremantle Local Planning Scheme No. 4

2. **Approve** DAP Application reference DAP/25/023837 and accompanying plans DA002 (Rev A), DA003 (Rev A), DA004 (Rev A), DA101 (Rev A), DA102 (Rev C), DA0103 (Rev B), DA0104 (Rev B), DA0105 (Rev B), DA0106 (Rev B), DA0107 (Rev B), DA0108 (Rev B), DA0109 (Rev A), DA0201 (Rev A), DA202 (Rev A), DA301 (Rev A), DA302 (Rev A), dated 3 January 2025 (City of Fremantle received date)) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015, and the provisions of the City of Fremantle Local Planning Scheme No. 4, subject to the following conditions:

Conditions

Validity / Works Forming Part of Approval

1. This decision constitutes planning approval only and is valid for a period of four (4) years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.

2. All works indicated on the approved plans, including any footings, shall be wholly located within the cadastral boundaries of the subject site.

3. This approval does not relate to any proposed work(s) located outside of the cadastral boundaries of the subject site including the adjacent Goldsborough Street, Cantonment Street and Elder Place road reserves with the exception of awnings for weather protection. Any required or proposed works within these road reserves will be subject to separate approval from the City of Fremantle. Any costs associated with the design and construction of works within the road are to be borne by the landowner in full.

Materials / Finishes

4. Prior to the lodgement of a Building Permit application for the development hereby approved, final details of the external materials, colours and finishes of the proposed development, including a physical sample board or materials, is to be submitted and approved to the satisfaction of the City of Fremantle, on the advice of the City's Design Advisory Committee.

5. Prior to the lodgement of a Building Permit application for the development hereby approved, design plans for the location, materials and construction for screening of any proposed external building plant must be submitted to and approved by the City of Fremantle. All piped, ducted and wired services, air conditioners, hot water systems, water storage tanks, service meters, other plant and bin storage areas must be integrated into the design of the building and located to minimise any visual and/or noise impact on the occupants of nearby properties and screened from view from the street.

6. Prior to lodgement of a Building Permit application, storm water disposal and management plans, details and calculations must be submitted for approval by the City of Fremantle and thereafter implemented, constructed and maintained to the satisfaction of the City of Fremantle.

Landscaping / Tree Planting

7. Prior to the lodgement of a building permit application, the detailed landscaping plans shall be updated to the satisfaction of the City of Fremantle. Additional detail shall be provided with regards to deep soil areas, on-structure planting, species selection, tree planting and irrigation. The revised landscaping plans shall be submitted to, and approved by the City of Fremantle.

8. Prior to the occupation of the development, the approved landscaping plans shall be completed in accordance with the approved plans or any approved modifications thereto and be maintained for the life of the development, to the satisfaction of the City of Fremantle.

9. Prior to the occupation of the development, the proposed on-site tree planting (including the provision of 41 small trees) shall be completed in accordance with the approved plans or any approved modifications thereto, to the satisfaction of the City of Fremantle. All landscaped areas are to be maintained on an ongoing basis for the life of the development, to the satisfaction of the City of Fremantle.

Lighting

10. Prior to the lodgement of a Building Permit application for the development hereby approved, an outdoor lighting plan must be submitted and approved by the City of Fremantle. The outdoor lighting is to be designed, baffled and located to prevent any increase in light spill onto the adjoining properties.

Parking and Traffic

11. Prior to the submission of a Building Permit, the applicant is to submit detailed plans for the provision of three (3) loading/service bays within the road reserves immediately adjacent the subject site for approval by the City of Fremantle.

Prior to the occupation of the development hereby approved, the three (3) loading/service bays are to be constructed in agreement with the City of Fremantle. All costs associated with the design and construction of the parking bays are to be borne by the landowner in full.

12. Prior to the lodgement of a building permit application for the works hereby approved, a traffic impact study addressing any need resulting from the development for the upgrading of the adjacent roads, including the location of access points to the on-site parking with particular attention to queuing, sight lines for exiting vehicles, weaving and gap analysis at the development's vehicle entries, being submitted and approved by City of Fremantle's Traffic Design Officer.

    The recommendations of the approved Plan are to be implemented at the developer's cost, prior to the occupation of building(s).

13. Prior to the occupation of the development hereby approved, vehicle crossovers shall be constructed to the City's specification and thereafter maintained to the satisfaction of the City of Fremantle for the life of the development.

14. Prior to the occupation of the development hereby approved, any redundant crossovers shall be removed and the verge and kerbing reinstated to the City's specifications, at the expense of the applicant and to the satisfaction of the City of Fremantle.

15. Prior to occupation of the development hereby approved, a detailed Car Parking Management Plan shall be submitted to, and approved by the City of Fremantle. The approved car parking management plan shall be implemented for the life of the development unless otherwise approved.

16. Prior to the lodgement of a Building Permit for the development hereby approved, the applicant is to submit, and have approved to the satisfaction of the City of Fremantle, a detailed parking plan design which complies with the Australian Standard AS/NZS 2890 and AS/NZS 1428, including parking bay/s (comprising visitor bays, loading bays, disabled bays, motorcycle / scooter bays), aisle widths, circulation areas, driveway/s and points of ingress and egress.

17. Prior to occupation of the development hereby approved, all bicycle parking/racks shown on the approved plans shall be provided to the satisfaction of the City of Fremantle and must be installed and thereafter be maintained for the life of the development, to the satisfaction of the City of Fremantle.

18. Prior to the occupation of the development hereby approved, all car parking, bicycle parking, motorcycle/scooter parking and vehicle access and circulation areas shall be maintained and available for car parking/loading, and vehicle access and circulation on an ongoing basis to the satisfaction of the City of Fremantle.

19. Prior to the issue of a Building Permit for the development hereby approved, end of trip facilities shall be provided, to the satisfaction of the City of Fremantle as follows:

    - 3 male and 3 female (or 6 unisex) shower facilities for the non-residential uses, and four (6) lockers.

    Prior to occupation of the development the approved end of trip facilities must be installed and thereafter be maintained for the life of the development, to the satisfaction of the City of Fremantle.

Management Plans

20. Prior to occupation of the development hereby approved, a detailed Management Plan for the 'Co-Living' units and use shall be submitted to, and approved by the City of Fremantle. The management plans will outline operational management plans for the units and the operator, including, but not be limited to: access to units and car/bicycle bays for tenants, visitors, deliveries, mitigation of noise and other potential nuisance.

    The approved management plan shall be implemented for the life of the development unless otherwise approved.

21. Prior to the lodgement of a Building Permit application, an updated Waste Management Plan shall be prepared in accordance with advice from the City's Waste Management Team Leader and subsequently be submitted to, and approved by the City of Fremantle.

    Prior to the occupation of the development, the approved waste management plan must be implemented and adhered to at all times to the satisfaction of the City of Fremantle unless otherwise approved by the City of Fremantle.

22. Prior to the lodgement of a Building Permit application, and a Demolition and Construction Plan shall be submitted and approved, to the satisfaction of the City of Fremantle addressing, but not limited to, the following matters:

    a) Use of City car parking bays for construction related activities;
    b) Protection of infrastructure and street trees within the road reserve;
    c) Security fencing around construction sites;
    d) Gantries;
    e) Access to site by construction vehicles;
    f) Contact details;
    g) Site offices;
    h) Noise - Construction work and deliveries;
    i) Sand drift and dust management;
    j) Waste management;
    k) Dewatering management plan;
    l) Traffic management;

m) Works affecting pedestrian areas;
n) Asbestos removal management plan;
o) Dilapidation reports of nearby properties; and
p) Any other matter deemed to be relevant by the City of Fremantle.

The approved Demolition and Construction Management Plans shall be adhered to throughout the demolition of the existing building on site and construction of the new development.

Heritage

23. Prior to the lodgement of a Building Permit, the following information and/or additional detail, pertaining to the 1927 State Registered building, is to be provided to the satisfaction of the City of Fremantle on the advice of the Heritage Council of Western Australia:

    i. All columns and beams to the 1927 building to be retained to maximum extent, inclusive of the proposed internal courtyard/lightwell area currently proposed for demolition, to the satisfaction of the Director, Historic Heritage Conservation.
    ii. All original external signage is to be retained and exposed.
    iii. The following further information is to be provided to the satisfaction of the Director, Historic Heritage Conservation, prior to the application of a Building Permit:
        a. Further details of the proposed ramps and external landscaping to Goldsborough St.
        b. Further information of proposed works, and associated impact on heritage fabric, required to comply with the National Construction Code.
        c. An Interpretation Plan for the Elders Wool Store that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent use of the place by the Western Australian and international skateboarding community.
        d. Prior to application for an Occupancy Permit, a signage strategy that provides for a coordinated approach for tenancy and wayfinding signage is to be provided to the satisfaction of the Director, Historic Heritage Conservation. The strategy is to include method of fixing, location, dimensions, and design for new signage.

24. Prior to the submission of a Building Permit application, the following further information and detail is to be submitted to, and approved by the City of Fremantle:

    i. A detailed Conservation Plan for the entire building.
    ii. A conservation methodology which specifically details the immediate protection, management and conservation, the during demolition and during construction protection, management and conservation and the ongoing protection, management and conservation of the retained heritage fabric, relocated heritage fabric, interpretation elements and machinery.

iii. A detailed archival record of the entire building photographing and noting in detail the location, type and condition of all material to be demolished and all material to be reused.
iv. A detailed plan for the retention / relocation / conservation and interpretation of all machinery, chutes and signage that are related to the wool use of the building.
v. A detailed schedule of materials and finishes.

25. Prior to the submission of an occupation of the development hereby approved, the following further information and detail is to be submitted to, and approved by the City of Fremantle:

i. The full implementation of the conservation methodology as per the City of Fremantle approved Conservation Methodology plan.
ii. The installation of all interpretation elements as per the City of Fremantle on the advice of the Director, Historic Heritage Conservation, DPLH approved Interpretation Plan.
iii. The retention / relocation / conservation and interpretation of all machinery, chutes and signage that are related to the wool use of the building as per the City of Fremantle approved plan.

Acoustics and Noise

26. Prior to the lodgement of a Building Permit application for the development hereby approved, details of how the recommendations contained in the Acoustic Report (prepared by Lloyd George Acoustics Pty Ltd, ref. 242028739) are to be implemented, are to be submitted to, and approved by the City of Fremantle. The measures shall be constructed, implemented and maintained for the life of the development. Any necessary works require additions, alterations and/or treatments of existing heritage building fabric, will require details to be submitted to, and approved by the City of Fremantle, prior to the commencement of such works.

27. Prior to the lodgement of a Building Permit application for the development hereby approved, details are to be submitted and approved by the City of Fremantle that demonstrate that the development incorporates the noise mitigation 'Quiet House Requirements' Category (A) of Table 2 of the State Planning Policy 5.4 'Road and Rail Noise Guidelines', or designs and implements an approved noise management plan by a qualified acoustic consultant, to the satisfaction of the City of Fremantle.

28. Prior to the lodgement of a Building Permit application for the development hereby approved, the design and materials of the development shall demonstrate compliance with the requirements set out within City of Fremantle policy LPP 2.3 - Fremantle Port Buffer Area Development Guidelines for properties contained within 'Area 2'.

29. Prior to the lodgement of a Building Permit application for the residential development hereby approved, the design and materials of the development is to demonstrate

adherence to the requirements set out within City of Fremantle Local Planning Policy 2.18 – New Residential Developments in the City Centre Zone – Noise from an Existing Source. Specifically, the development shall provide the following, at a minimum:

a) to all external openings (windows and doors):
   i. airtight rubber seals to provide acoustic protection; and
   ii. sliding windows shall be substituted with awning windows as they are able to achieve a positive compression seal; and
   iii. standard 6mm glass shall be substituted with sealed thickened laminated glass (no less than 10mm); or
   iv. standard 6mm glass shall be substituted with acoustic double glazing incorporating a 12mm thick pane of laminated glass set in a sealed metal frame with a 100mm air gap to the other pane of glass;

b) to all external walls:
   i. shall achieve a sound rating of Rw 45 dB or greater;

c) to all floors and ceilings:
   i. A 150mm thick concrete slab with either carpet or acoustically installed timber flooring or tiles; or
   ii. Installing high density insulation batts into the cavity of a lightweight, suspended and floating ceilings or floors to absorb sound; or
   iii. Building components are isolated using resilient compounds such as rubber, neoprene or silicone for the purpose of reducing the transfer of noise.

Notifications on Titles

30. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the *Transfer of Land Act 1893* shall be prepared to the satisfaction of the City of Fremantle and registered against the Certificate of Title of every residential dwelling, to notify owners and prospective purchasers of any dwelling that the land is located in the City Centre and in close proximity or adjacent to, an area where non-residential uses may exist or be approved and, as a result, the land may be affected by activities and noise not normally associated with residential development. All costs and incidentals relating to the preparation of and registration of the Section 70A notification, including related City of Fremantle Solicitors' costs, shall be met by the owner of the land.

31. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the *Transfer of Land Act 1893* shall be registered against the Certificate of Title to the land the subject of the proposed development advising the owners and subsequent owners of the land that the subject site is located in close proximity to the Fremantle Port and may be subject to noise, odour and activity not normally associated with residential use. The notification is to be prepared by the City's solicitors at the expense of the owner and be executed by all parties prior to occupation.

32. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the Transfer of Land Act 1893 shall be registered against the Certificate of Title to the land the subject of the proposed development advising the owners and subsequent owners of the land that "this development is in the vicinity of a transport corridor and is affected, or may in the future be affected, by road and rail transport noise and vibration. Road and rail transport noise and vibration levels may rise and fall over time depending on the type and volume of traffic.". The notification is to be prepared by the City's solicitors at the expense of the owner and be executed by all parties prior to occupation.

Sustainability

33. Prior to the lodgement of a building permit application, a Green Star 'Designed' assessment from the Green Building Council of Australia (GBCA) demonstrating that the building's design has been assessed and is on track to achieve a minimum 4 Star Green Star Certified rating; OR, a Sustainable Design Assessment Report prepared by a practicing Green Star Accredited Professional (GSAP) as equivalence, is to be submitted to, and approved by the City of Fremantle.

34. Prior to occupation, a Green Star 'Certified' rating with certification from the Green Building Council of Australia (GBCA) confirming the building's design and construction achieve a minimum 4 Star Green Star Certified rating; OR a Sustainable Design Assessment Report prepared by a practicing Green Star Accredited Professional (GSAP) as equivalence, is to be submitted to, and approved by the City of Fremantle.

Public Art

35. Prior to the occupation of the development hereby approved, the owner shall contribute a monetary amount equal in value to one percent of the estimated development cost as indicated on the Form of Application for Planning Approval, to the City of Fremantle for development of public art works to enhance the public realm. Based on the estimated cost of the development being $110 million dollars the contribution to be made is $1.1 million dollars.

Liveable Housing

36. Prior to the issue of a building permit, amended development plans shall be submitted to the satisfaction of the City of Fremantle, which include a minimum of:

    i. 20 per cent of all dwellings, across a range of dwelling sizes, meet Silver Level requirements as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia), OR

    ii. 5 per cent of dwellings to be designed to Platinum Level as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia).

The dwellings shall be maintained as such for the life of the development.

Water Metering

37. Prior to the issue of a building permit, details are to be submitted that demonstrate that each dwelling will be individually metered for water use to the satisfaction of the City of Fremantle.

38. Where any of the preceding conditions has a time limitation for compliance, if any condition is not met by the time requirement within that condition, then the obligation to comply with the requirements of any such condition (other than the time limitation for compliance specified in that condition), continues whilst the approved development continues.

Advice Notes

i. A demolition permit is required to be obtained for the proposed demolition work. The demolition permit must be issued prior to the removal of any structures on site.

ii. A Building permit is required for the proposed Building Works. A certified BA1 application form must be submitted and a Certificate of Design Compliance (issued by a Registered Building Surveyor Contractor in the private sector) must be submitted with the BA1.

iii. The applicant is advised of the requirement to prepare a 'Planning Condition Schedule' that outlines how each of the above conditions have been addressed, with specific reference to plans and/or other supporting documentation where relevant and share this with officers to assist City officers in the process of clearance of relevant conditions.

The applicant will need to submit an application for request for condition clearance and the pay the requisite fee to commence this process.

iv. This approval does not authorise the removal or modification of verge infrastructure and/or verge trees within the verge area. Written approval is to be obtained for removal or modification of verge infrastructure and/or verge trees within the verge area from the relevant City of Fremantle department or relevant service authority, before construction commences. Please refer to the City's Tree Planting and Vehicle Crossings Policies (SG28 and MD0015) for further information.

v. Prior to commencement of the development, or any works associated with the development, the applicant/owner is required to submit an application to the satisfaction of the Public Transport Authority (PTA) and must obtain approval from the PTA for works in and around the operating Railway Corridor in accordance with the PTA's 8810-450-003 – Procedure – Working In and around the PTA Rail Corridor, Assets and Infrastructure.

vi. The development is within 50m of the PTA Railway Reserve, this places the proposed development within the PTA Protection Zone. An application to PTA third party access is required prior to the commencement of any development/construction works within the Protection Zone.

vii. The applicant is advised of the need to liaise with the Water Corporation to obtain and necessary approvals in relation to the development and the relocation/alteration of water infrastructure.

viii. The proponent must:

i. make application to Environmental Health Services via Form 1 - Application to construct, alter or extend a public building as a requirement of the *Health (Public Buildings) Regulations 1992*;
ii. once construction has been completed, make application to Environmental Health Services via Form 2 - Application for a public building certificate;

AND

iii. once construction has been completed, complete and submit Form 5 - Certificate of Electrical Compliance for a Public Building to Environmental Health Services.

Note that Section 1 does not apply to or in relation to building work, as defined in the *Building Act 2011* section 3, for which a building permit is required under that Act.

For further information and a copy of the application form contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

ix. The proponent must make application during the Building Permit application stage to Environmental Health Services via Schedule 3 – Application for registration of a lodging house as a requirement of the City of Fremantle's Health Local Laws 1997. For further information and a copy of the application form contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

x. The Co-Living Apartments in the proposal do not appear to be self-contained dwellings (i.e. residential flats). As such, their operation constitutes a lodging house under the *Health (Miscellaneous Provisions) Act 1911*. Facilities and services for the lodging house must adhere to the registration, design and management requirements detailed in the *Health (Miscellaneous Provisions) Act 1911* and the City's Health Local Laws 1997. In particular, please note and implement the design requirements for laundries, kitchen and dining room:

ii. Laundry – 1 laundry unit consisting of a washing machine, wash trough and clothes dryer, for every 15 lodgers.
iii. Kitchen – minimum floor area of 0.65 square meters per lodger.

iv. Cooking facilities – 2x ovens and 4x four burner stoves for the first 60 lodgers+ 1 four burner stove for each additional 15 lodgers (or part thereof) over the initial 60 lodgers.

v. Dining Room – minimum floor area of 0.5 square meters per lodger with adequate furnishings to accommodate ½ the lodgers at any one time.

xi. The applicant is advised that a crossover permit must be obtained from the City's Engineering Department. New/modified crossover(s) shall comply with the City's standard for crossovers, which are available on the City of Fremantle's web site.

xii. The applicant is encouraged to maintain the adjacent verge in accordance with the City's Verge Garden Policy which can be found on the City website at: https://www.fremantle.wa.gov.au/resident-perks

xiii. If the development utilises an air-handling system as defined in AS 3666, which uses water or other liquids to operate, humidify, clean, maintain, heat or cool the air, the system must apply for, and obtain, approval for the air-handling system, water system or cooling tower, from the City of Fremantle as required under the *Health (Air-handling and Water Systems) Regulations 1994*. For further information contact Environmental Health Services on 9432 9856 or via health@fremantle.wa.gov.au.

xiv. Any removal of asbestos is to comply with the following –

Under ten (10) square metres of bonded (non-friable) asbestos can be removed without a license and in accordance with the *Health (Asbestos) Regulations 1992* and the *Environmental Protection (Controlled Waste) Regulations 2001*. Over 10 square metres must be removed by a licensed person or business for asbestos removal. All asbestos removal is to be carried out in accordance with the *Occupational Safety and Health Act 1984* and accompanying regulations and the requirements of the *Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC: 2002 (2005)]*. Note: Removal of any amount of friable asbestos must be done by a licensed person or business and an application submitted to WorkSafe, Department of Commerce. http://www.docep.wa.gov.au

xv. Effective measures shall be taken to stabilize sand and ensure no sand escapes from the property by wind or water in accordance with the City's Prevention and Abatement of Sand Drift Local Law.

xvi. If construction works involve the emission of noise above the assigned levels in the *Environmental Protection (Noise) Regulations 1997*, they should only occur on Monday to Saturday between 7.00 am and 7.00 pm (excluding public holidays). In instances where such construction work needs to be performed outside these hours, an *Application for Approval of a Noise Management Plan* must be submitted to the City of Fremantle Environmental Health Services for approval at least 7 days before construction can commence.

Note: Construction work includes, but is not limited to, Hammering, Bricklaying, Roofing, use of Power Tools and radios etc.

xvii. All noise from the proposed development must comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* (as amended), such as:

1. mechanical service systems like air-conditioners, exhaust outlets, motors, compressors and pool filters;
2. vehicles;
3. amplified acoustic systems; and
4. patron noise.

It is advised to seek the services of a competent acoustic consultant to assist the applicant to address the potential noise impacts on noise sensitive receivers.

xviii. The premises must comply with the *Food Act 2008*, regulations and the Food Safety Standards incorporating AS 4674-2004 *Design, construction and fit-out of food premises*. Detailed architectural plans and elevations must be submitted to Environmental Health Services for approval prior to construction via an application to notify/register a food business. The food business is required to be registered under the *Food Act 2008*. For further information contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

xix. The applicant is advised that where contamination is detected, the site is required to be reported to the Department of Water and Environmental Regulation and remediated in accordance with the requirements of that Department. For further information, please see the Department fact sheet on Identifying and Reporting Contaminated sites available online at https://www.der.wa.gov.au/images/documents/your-environment/contaminated-sites/Fact_sheets_tech_advice/Fact_sheet_1.pdf

xx. The owner is advised that an obstruction permit will be required from the City for any future obstruction of the Goldsbroough, Elder or Cantonment Street road reserves. An application for obstruction permit can be found via www.fremantle.wa.gov.au.

xxi. The applicant/owner is advised that a verge bond deposit fee must be paid prior to the issue of a demolition permit or building permit. Details in regard to the verge bond can be found on the City's website at: https://www.fremantle.wa.gov.au/residents/trees-and-verges#Verge Bonds

xxii. The applicant is advised that the proposed works indicated outside of the lot boundaries of the subject site do not form part of this approval. Should the applicant wish to undertake these works separate approval is required from the City. Queries relating to these works should be directed to the City's Parks and Landscape team via info@fremantle.wa.gov.au or 9432 9999.

xxiii. The applicant is advised that any signage may be subject to a separate application for planning approval.

xxiv. The applicant is advised, with regard to stormwater management, to implement an on-site stormwater management solution, to the maximum available capacity in line with the city's requirements.

xxv. With regard to the GBCA Green Star project registration and design assessment demonstrate sustainable built design performance requirements in accordance with Local Planning Policy 2.13. A Green Star 'equivalency' self-assessment pathway requires a Sustainable Design Assessment Report aligned to the current GBCA Green Star Buildings rating tool, prepared by a practicing Green Star Accredited Professional (GSAP), and that includes, but is not limited to:

1. Statement of compliance that the building's design will achieve, or has achieved in construction, the performance requirements of a 4 Star Green Star building using the current GBCA Green Star Buildings rating tool.
2. A comprehensive report detailing the sustainability initiatives incorporated in the building design described in full with referenced supporting documentation.
3. A Green Star Scorecard matrix showing targeted credit points with detailed comments documenting how the credit is satisfied and referenced to supporting documentation.
4. Report author GSAP credentials.
5. Evidence to substantiate each credit claim and to demonstrate the level of performance as per the Green Star Buildings rating tool Submission Guidelines.
6. List of supporting documentation referencing information used such as calculators, modelling, specifications, contracts, brief requirements, client instructions, plans, reports, and drawings including working drawing stages.

Note 1: A Green Star 'equivalent' self-assessment pathway does not allow the building to be marketed or promoted as a Green Star building nor use the Green Star logo or trademark.

Note 2: Minimum expectations of the current Green Star Buildings rating tool need to be met. Partial points can not be awarded under Green Star 'Buildings' rating tool, and the total credit points targeted to include a reasonable buffer of points.

xxvi. The GBCA Green Star final certification demonstrates sustainable built design and construction performance requirements in accordance with Local Planning Policy 2.13. The Green Star certification may be submitted within 2 years from practical completion of the project.

Green Star ‘equivalency’ self-assessment pathway requires a Sustainable Design Assessment Report aligned to the current GBCA Green Star Buildings rating tool, prepared by a practicing Green Star Accredited Professional (GSAP), demonstrating that the Green Star rating outcomes have been achieved for the building as constructed with a supporting documentation produced as part of the design, procurement, construction or commission process.

Note: A Green Star ‘equivalent’ self-assessment pathway does not allow the building to be marketed or promoted as a Green Star building nor use the Green Star logo or trademark.

xxvii. Any works within the adjacent thoroughfare, i.e. road, kerbs, footpath, verge, crossover or right of way, requires a separate approval from the City of Fremantle’s Infrastructure Business Services department who can be contacted via info@fremantle.wa.gov.au or 9432 9999.

xxviii. Any existing tree(s) within the adjacent road reserve(s) shall be protected through the implementation of a Tree Protection Zone for protection during construction.

Additional information with regard to the tree protection zone requirements can be found here: https://www.fremantle.wa.gov.au/residents/trees-and-verges

Metro Inner Development Assessment Panel Minutes

Meeting Date and Time: Tuesday, 29 April 2025; 9:30am
Meeting Number: MIDAP/69
Meeting Venue: 140 William Street, Perth

A recording of the meeting is available via the following link:
MIDAP/69 - 29 April 2025 - City of Stirling - City of Fremantle

PART A – INTRODUCTION

1. Opening of Meeting, Welcome and Acknowledgement
2. Apologies
3. Members on Leave of Absence
4. Noting of Minutes

PART B – CITY OF STIRLING

1. Declaration of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications

   3.1 Lot 500 (No.12) Reserve Street, Scarborough - Mixed Use Development 235 Multiple Dwellings, Six Commercial Tenancies And Eight Community Uses – DAP/25/02855
4. Form 2 DAP Applications
5. Section 31 SAT Reconsiderations

PART C – CITY OF FREMANTLE

1. Declaration of Due Consideration
2. Disclosure of Interests
3. Form 1 DAP Applications

   3.1 Lot 201 (No.1) Goldsbrough St and Part Lot 40 (Nos.48-68) Cantonment St, Fremantle - Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop And Tavern Land Uses – DAP/25/02837

   3.2 Lot 116 (No.47) Pakenham Street, Fremantle - Mixed Use Development – DAP/25/02841
4. Form 2 DAP Applications
5. Section 31 SAT Reconsiderations

Clayton Higham
Presiding Member, Metro Inner DAP

This document was produced on Whadjuk Noongar Boodjar

PART D – OTHER BUSINESS

1. State Administrative Tribunal Applications and Supreme Court Appeals
2. Meeting Closure

Clayton Higham
Presiding Member, Metro Inner DAP

This document was produced on Whadjuk Noongar Boodjar

ATTENDANCE	
Specialist DAP Members	*DAP Secretariat*
Clayton Higham (Presiding Member) Francesca Lefante (Deputy Presiding Member) John Syme	Kristen Parker Claire Ortlepp
Part B – City of Stirling	
Local Government DAP Members	*Officers/Technical Advisors in Attendance*
Cr Suzanne Migdale Cr Michael Dudek	Michael Italiano Karina Bowater Sam Michie James Fletcher Jaydon Catlin
Part C – City of Fremantle	
Local Government DAP Members	*Officers/Technical Advisors in Attendance*
Cr Andrew Sullivan Cr Jemima Williamson-Wong	Chloe Johnston Jonathan Dornan

Clayton Higham
Presiding Member, Metro Inner DAP

This document was produced on Whadjuk Noongar Boodjar

Applicant and Submitters
Part B – City of Stirling
Dan Lees (Element Advisory) Cale Otter (Element Advisory) Daniel Visser (Edge Visionary Living) Tayah Geneff (Edge Visionary Living) Greg Ewart (Hillam Architects) Samira Ghani (Hillam Architects)
Part C – City of Fremantle
Item 3.1
Megan Gammon (Urbis) Declan Creighan (Urbis) Phil Griffiths (Griffiths Architecture) Michael Patroni (Space Agency Architecture) Corey Scidone (Human Urban) Sarah Booth (Human Urban) Catherine Young (Human Urban) Zoe Tsagalis (Human Urban) Roel Loopers (Freo Blog) John Dowson (The Fremantle Society) Matthew McNeilly (Sirona Urban) Sylvain Tognelli (West Australian Skateboarding Association) Michael Kordas (West Australian Skateboarding Association) Connor McLeod (West Australian Skateboarding Association) Zachary Tilghman (West Australian Skateboarding Association) Ben Bowring (West Australian Skateboarding Association) Rowan Wright (West Australian Skateboarding Association) Gustav Svanborg Eden Morgan Campbell Gasseng Jack Morellini Rachel Salmon-Lomas Ken Adam

Clayton Higham
Presiding Member, Metro Inner DAP

Chrissie Maus (Fremantle Chamber of Commerce) Jo Smith (Circus WA)
Part C – City of Fremantle
Item 3.2
Ben Doyle (Planning Solutions) Felipe Soto Katrina Cinanni Frank Tyson Stacey Towne Pamela Cattalini John Dowson (The Fremantle Society) Kate Pearson

Members of the Public / Media

There were 17 members of the public in attendance.

Observers via livestream

There were 51 persons observing the meeting via the livestream.

Clayton Higham
Presiding Member, Metro Inner DAP

This document was produced on Whadjuk Noongar Boodjar

PART A – INTRODUCTION

1. Opening of Meeting, Welcome and Acknowledgement

The Presiding Member declared the meeting open at 9:34am on 29 April 2025 and acknowledged the traditional owners and custodians of the land on which the meeting was held and welcomed members.

The Presiding Member announced the meeting would be run in accordance with the DAP Standing Orders 2024 under the *Planning and Development (Development Assessment Panels) Regulations 2011.*

1.1 Announcements by Presiding Member

The Presiding Member advised that panel members may refer to technical devices, such as phones and laptops, throughout the meeting to assist them in considering the information before them.

The meeting was recorded and livestreamed on the DAP website in accordance with regulation 40(2A) of the *Planning and Development (Development Assessment Panels) Regulations 2011*. Members were reminded to announce their name and title prior to speaking.

2. Apologies

Cr Ingrid Van Dorssen (Local Government DAP Member, City of Fremantle)

3. Members on Leave of Absence

Nil.

4. Noting of Minutes

DAP members noted that signed minutes of previous meetings are available on the DAP website.

Clayton Higham
Presiding Member, Metro Inner DAP

PART C – CITY OF FREMANTLE

Cr Andrew Sullivan & Cr Jemima Williamson-Wong (Local Government DAP Members, City of Fremantle) and joined the panel at 9:59am.

1. Declaration of Due Consideration

All members declared that they had duly considered the documents contained within Part C of the Agenda and Part C of the Related Information.

2. Disclosure of Interests

DAP Member, Cr Jemima Williamson-Wong, declared an impartiality interest in Item 3.1. Cr Williamson-Wong's godmother works for Space Agency.

In accordance with section 2.4.9 of the DAP Code of Conduct 2024, DAP Member, Cr Andrew Sullivan and Cr Jemima Williamson-Wong, declared that they had participated in a prior Council meeting in relation to the application at Items 3.1 and 3.2. However, under section 2.1.2 of the DAP Code of Conduct 2024, Cr Sullivan and Cr Williamson-Wong acknowledged that they are not bound by any previous decision or resolution of the local government and undertake to exercise independent judgment in relation to any DAP application before them, which will be considered on its planning merits.

In accordance with section 3.3 of the DAP Code of Conduct 2024, the Presiding Member determined that Cr Williamson-Wong, who had disclosed impartiality interests, was permitted to participate in the discussion and voting on the items and the DAP Executive Director determined that Cr Sullivan, who had disclosed an impartiality interest, was permitted to participate in the discussion and voting on the items.

3. Form 1 DAP Applications

3.1 Lot 201 (No.1) Goldsbrough St and Part Lot 40 (Nos.48-68) Cantonment St, Fremantle - Seven (7) Storey Mixed Use Development Comprising 39 Multiple Dwellings, 174 Co-Living (Residential Building) Units, Office, Restaurant/Café, Shop And Tavern Land Uses – DAP/25/02837

Deputations and Presentations

John Dowson (The Fremantle Society) addressed the DAP against the recommendation for the application at Item 3.1.

Matthew McNeilly (Sirona Urban) addressed the DAP against the recommendation for the application at Item 3.1.

Michael Kordas (West Australian Skateboarding Association) addressed the DAP against the recommendation for the application at Item 3.1 and responded to questions from the panel.

Sylvain Tognelli (West Australian Skateboarding Association) addressed the DAP against the recommendation for the application at Item 3.1 and responded to questions from the panel.

Jo Smith (Circus WA) addressed the DAP in support of the recommendation for the application at Item 3.1.

Zachary Tilghman (West Australian Skateboarding Association) addressed the DAP against the recommendation for the application at Item 3.1 and responded to questions from the panel.

Gustav Svanbvorg Eden addressed the DAP against the recommendation for the application at Item 3.1.

Morgan Campbell Gasseng addressed the DAP against the recommendation for the application at Item 3.1.

Jack Morellini addressed the DAP against the recommendation for the application at Item 3.1.

Connor McLeod addressed the DAP against the recommendation for the application at Item 3.1.

Rachel Salmon-Lomas addressed the DAP against the recommendation for the application at Item 3.1.

Ben Bowring (West Australian Skateboarding Association) addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

Ken Adam addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

Chrissie Maus (Fremantle Chamber of Commerce) addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

Corey Scidone (Human Urban) addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

Michael Patroni (Space Agency Architects) addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

Clayton Higham
Presiding Member, Metro Inner DAP

Phil Griffiths (Griffiths Architects) addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

Megan Gammon (Urbis) addressed the DAP in support of the recommendation for the application at Item 3.1 and responded to questions from the panel.

The panel noted a written submission in support of the recommendation for the application at Item 3.1 was received from The Department Planning, Lands and Heritage.

The City of Fremantle addressed the DAP in relation to the application at Item 3.1 and responded to questions from the panel.

PROCEDURAL MOTION

Moved by: Clayton Higham **Seconded by:** John Syme

That the meeting be adjourned for a period of 10 minutes.

The Procedural Motion was put and CARRIED UNANIMOUSLY.

REASON: To allow members a comfort break.

The meeting was adjourned at 12:25pm.
The meeting was reconvened at 12:34pm.

REPORT RECOMMENDATION

Moved by: Cr Andrew Sullivan **Seconded by:** Cr Jemima Williamson-Wong

An administrative amendment was made to correct the numbering of advice notes.

That the Metro Inner DAP resolves to:

1. **Accept** that the DAP Application reference DAP/25/02837 is appropriate for consideration as "Multiple Dwelling", "Residential Building", "Office", "Restaurant/Café and "Tavern" land uses and compatible with the objectives of the zoning table in the City of Fremantle Local Planning Scheme No. 4

2. **Approve** DAP Application reference DAP/25/02837 and accompanying plans DA002 (Rev A), DA003 (Rev A), DA004 (Rev A), DA101 (Rev A), DA102 (Rev B), DA0103 (Rev B), DA0104 (Rev B), DA0105 (Rev B), DA0106 (Rev B), DA0107 (Rev B), DA0108 (Rev B), DA0109 (Rev A), DA0201 (Rev A), DA202 (Rev A), DA301 (Rev A), DA302 (Rev A), dated 3 January 2025 (City of Fremantle received date) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015, and the provisions of the City of Fremantle Local Planning Scheme No. 4, subject to the following conditions:

Conditions

Validity / Works Forming Part of Approval

1. This decision constitutes planning approval only and is valid for a period of four (4) years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.

2. All works indicated on the approved plans, including any footings, shall be wholly located within the cadastral boundaries of the subject site.

3. This approval does not relate to any proposed work(s) located outside of the cadastral boundaries of the subject site including the adjacent Goldsborough Street, Cantonment Street and Elder Place road reserves with the exception of awnings for weather protection. Any required or proposed works within these road reserves will be subject to separate approval from the City of Fremantle. Any costs associated with the design and construction of works within the road are to be borne by the landowner in full.

Materials / Finishes

4. Prior to the lodgement of a Building Permit application for the development hereby approved, final details of the external materials, colours and finishes of the proposed development, including a physical sample board or materials, is to be submitted and approved to the satisfaction of the City of Fremantle, on the advice of the City's Design Advisory Committee.

5. Prior to the lodgement of a Building Permit application for the development hereby approved, design plans for the location, materials and construction for screening of any proposed external building plant must be submitted to and approved by the City of Fremantle. All piped, ducted and wired services, air conditioners, hot water systems, water storage tanks, service meters, other plant and bin storage areas must be integrated into the design of the building and located to minimise any visual and/or noise impact on the occupants of nearby properties and screened from view from the street.

6. Prior to lodgement of a Building Permit application, storm water disposal and management plans, details and calculations must be submitted for approval by the City of Fremantle and thereafter implemented, constructed and maintained to the satisfaction of the City of Fremantle.

Landscaping / Tree Planting

7. Prior to the lodgement of a building permit application, the detailed landscaping plans shall be updated to the satisfaction of the City of Fremantle. Additional detail shall be provided with regards to deep soil areas, on-structure planting, species selection, tree planting and irrigation. The revised landscaping plans shall be submitted to, and approved by the City of Fremantle.

8. Prior to the occupation of the development, the approved landscaping plans shall be completed in accordance with the approved plans or any approved modifications thereto and be maintained for the life of the development, to the satisfaction of the City of Fremantle.

9. Prior to the occupation of the development, the proposed on-site tree planting (including the provision of 41 small trees) shall be completed in accordance with the approved plans or any approved modifications thereto, to the satisfaction of the City of Fremantle. All landscaped areas are to be maintained on an ongoing basis for the life of the development, to the satisfaction of the City of Fremantle.

Lighting

10. Prior to the lodgement of a Building Permit application for the development hereby approved, an outdoor lighting plan must be submitted and approved by the City of Fremantle. The outdoor lighting is to be designed, baffled and located to prevent any increase in light spill onto the adjoining properties.

Parking and Traffic

11. Prior to the submission of a Building Permit, the applicant is to submit detailed plans for the provision of three (3) loading/service bays within the road reserves immediately adjacent the subject site for approval by the City of Fremantle.

    Prior to the occupation of the development hereby approved, the three (3) loading/service bays are to be constructed in agreement with the City of Fremantle. All costs associated with the design and construction of the parking bays are to be borne by the landowner in full.

12. Prior to the lodgement of a building permit application for the works hereby approved, a traffic impact study addressing any need resulting from the development for the upgrading of the adjacent roads, including the location of access points to the on-site parking with particular attention to queuing, sight lines for exiting vehicles, weaving and gap analysis at the development's vehicle entries, being submitted and approved by the City of Fremantle.

    The recommendations of the approved Plan are to be implemented at the developer's cost, prior to the occupation of building(s) to the satisfaction of the City of Fremantle.

13. Prior to the occupation of the development hereby approved, vehicle crossovers shall be constructed to the City's specification and thereafter maintained to the satisfaction of the City of Fremantle for the life of the development.

14. Prior to the occupation of the development hereby approved, any redundant crossovers shall be removed and the verge and kerbing reinstated to the City's specifications, at the expense of the applicant and to the satisfaction of the City of Fremantle.

15. Prior to occupation of the development hereby approved, a detailed Car Parking Management Plan shall be submitted to, and approved by the City of Fremantle. The approved car parking management plan shall be implemented for the life of the development unless otherwise approved.

16. Prior to the lodgement of a Building Permit for the development hereby approved, the applicant is to submit, and have approved to the satisfaction of the City of Fremantle, a detailed parking plan design which complies with the Australian Standard AS/NZS 2890 and AS/NZS 1428, including parking bay/s (comprising visitor bays, loading bays, disabled bays, motorcycle / scooter bays), aisle widths, circulation areas, driveway/s and points of ingress and egress.

17. Prior to occupation of the development hereby approved, all bicycle parking/racks shown on the approved plans shall be provided to the satisfaction of the City of Fremantle and must be installed and thereafter be maintained for the life of the development, to the satisfaction of the City of Fremantle.

18. Prior to the occupation of the development hereby approved, all car parking, bicycle parking, motorcycle/scooter parking and vehicle access and circulation areas shall be maintained and available for car parking/loading, and vehicle access and circulation on an ongoing basis to the satisfaction of the City of Fremantle.

19. Prior to the issue of a Building Permit for the development hereby approved, end of trip facilities shall be provided, to the satisfaction of the City of Fremantle as follows:

    - 3 male and 3 female (or 6 unisex) shower facilities for the non-residential uses, and four (6) lockers.

    Prior to occupation of the development the approved end of trip facilities must be installed and thereafter be maintained for the life of the development, to the satisfaction of the City of Fremantle.

Management Plans

20. Prior to occupation of the development hereby approved, a detailed Management Plan for the 'Co-Living' units and use shall be submitted to, and approved by the City of Fremantle. The management plans will outline operational management plans for the units and the operator, including, but not be limited to: access to units and car/bicycle bays for tenants, visitors, deliveries, mitigation of noise and other potential nuisance.

    The approved management plan shall be implemented for the life of the development unless otherwise approved.

Clayton Higham
Presiding Member, Metro Inner DAP

21. Prior to the lodgement of a Building Permit application, an updated Waste Management Plan shall be prepared in accordance with advice from the City and subsequently be submitted to, and approved by the City of Fremantle.

    Prior to the occupation of the development, the approved waste management plan must be implemented and adhered to at all times to the satisfaction of the City of Fremantle unless otherwise approved by the City of Fremantle.

22. Prior to the lodgement of a Building Permit application, a Demolition and Construction Plan shall be submitted and approved, to the satisfaction of the City of Fremantle addressing, but not limited to, the following matters:

    a) Use of City car parking bays for construction related activities;
    b) Protection of infrastructure and street trees within the road reserve;
    c) Security fencing around construction sites;
    d) Gantries;
    e) Access to site by construction vehicles;
    f) Contact details;
    g) Site offices;
    h) Noise - Construction work and deliveries;
    i) Sand drift and dust management;
    j) Waste management;
    k) Dewatering management plan;
    l) Traffic management;
    m) Works affecting pedestrian areas;
    n) Asbestos removal management plan;
    o) Dilapidation reports of nearby properties; and
    p) Any other matter deemed to be relevant by the City of Fremantle.

    The approved Demolition and Construction Management Plans shall be adhered to throughout the demolition of the existing building on site and construction of the new development.

Heritage

23. Prior to the lodgement of a Building Permit, the following information and/or additional detail, pertaining to the 1927 State Registered building, is to be provided to the satisfaction of the City of Fremantle on the advice of the Heritage Council of Western Australia:

    i. All columns and beams to the 1927 building to be retained to maximum extent, inclusive of the proposed internal courtyard/lightwell area currently proposed for demolition, to the satisfaction of the Director, Historic Heritage Conservation.
    ii. All original external signage is to be retained and exposed.
    iii. The following further information is to be provided to the satisfaction of the Director, Historic Heritage Conservation, prior to the application of a Building Permit:

a. Further details of the proposed ramps and external landscaping to Goldsborough St.
b. Further information of proposed works, and associated impact on heritage fabric, required to comply with the National Construction Code.
c. An Interpretation Plan for the Elders Wool Store that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent use of the place by the Western Australian and international skateboarding community.
d. Prior to application for an Occupancy Permit, a signage strategy that provides for a coordinated approach for tenancy and wayfinding signage is to be provided to the satisfaction of the Director, Historic Heritage Conservation. The strategy is to include method of fixing, location, dimensions, and design for new signage.

24. Prior to the submission of a Building Permit application, the following further information and detail is to be submitted to, and approved by the City of Fremantle:

i. A detailed Conservation Plan for the entire building.
ii. A conservation methodology which specifically details the immediate protection, management and conservation, the during demolition and during construction protection, management and conservation and the ongoing protection, management and conservation of the retained heritage fabric, relocated heritage fabric, interpretation elements and machinery.
iii. A detailed archival record of the entire building photographing and noting in detail the location, type and condition of all material to be demolished and all material to be reused.
iv. A detailed plan for the retention / relocation / conservation and interpretation of all machinery, chutes and signage that are related to the wool use of the building.
v. A detailed schedule of materials and finishes.

25. Prior to the submission of an occupation of the development hereby approved, the following further information and detail is to be submitted to, and approved by the City of Fremantle:

i. The full implementation of the conservation methodology as per the City of Fremantle approved Conservation Methodology plan.
ii. The installation of all interpretation elements as per the City of Fremantle on the advice of the Director, Historic Heritage Conservation, DPLH approved Interpretation Plan.
iii. The retention / relocation / conservation and interpretation of all machinery, chutes and signage that are related to the wool use of the building as per the City of Fremantle approved plan.

Acoustics and Noise

26. Prior to the lodgement of a Building Permit application for the development hereby approved, details of how the recommendations contained in the Acoustic Report (prepared by Lloyd George Acoustics Pty Ltd, ref. 242028739) are to be implemented, are to be submitted to, and approved by the City of Fremantle. The measures shall be constructed, implemented and maintained for the life of the development. Any necessary works require additions, alterations and/or treatments of existing heritage building fabric, will require details to be submitted to, and approved by the City of Fremantle, prior to the commencement of such works.

27. Prior to the lodgement of a Building Permit application for the development hereby approved, details are to be submitted and approved by the City of Fremantle that demonstrate that the development incorporates the noise mitigation 'Quiet House Requirements' Category (A) of Table 2 of the State Planning Policy 5.4 'Road and Rail Noise Guidelines', or designs and implements an approved noise management plan by a qualified acoustic consultant, to the satisfaction of the City of Fremantle.

28. Prior to the lodgement of a Building Permit application for the development hereby approved, the design and materials of the development shall demonstrate compliance with the requirements set out within City of Fremantle policy LPP 2.3 - Fremantle Port Buffer Area Development Guidelines for properties contained within 'Area 2'.

29. Prior to the lodgement of a Building Permit application for the residential development hereby approved, the design and materials of the development is to demonstrate adherence to the requirements set out within City of Fremantle Local Planning Policy 2.18 – New Residential Developments in the City Centre Zone – Noise from an Existing Source. Specifically, the development shall provide the following, at a minimum:

    a) to all external openings (windows and doors):
        i. airtight rubber seals to provide acoustic protection; and
        ii. sliding windows shall be substituted with awning windows as they are able to achieve a positive compression seal; and
        iii. standard 6mm glass shall be substituted with sealed thickened laminated glass (no less than 10mm); or
        iv. standard 6mm glass shall be substituted with acoustic double glazing incorporating a 12mm thick pane of laminated glass set in a sealed metal frame with a 100mm air gap to the other pane of glass;

    b) to all external walls:
        i. shall achieve a sound rating of Rw 45 dB or greater;

c) to all floors and ceilings:
   i. A 150mm thick concrete slab with either carpet or acoustically installed timber flooring or tiles; or
   ii. Installing high density insulation batts into the cavity of a lightweight, suspended and floating ceilings or floors to absorb sound; or
   iii. Building components are isolated using resilient compounds such as rubber, neoprene or silicone for the purpose of reducing the transfer of noise.

Notifications on Titles

30. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the *Transfer of Land Act 1893* shall be prepared to the satisfaction of the City of Fremantle and registered against the Certificate of Title of every residential dwelling, to notify owners and prospective purchasers of any dwelling that the land is located in the City Centre and in close proximity or adjacent to, an area where non-residential uses may exist or be approved and, as a result, the land may be affected by activities and noise not normally associated with residential development. All costs and incidentals relating to the preparation of and registration of the Section 70A notification, including related City of Fremantle Solicitors' costs, shall be met by the owner of the land.

31. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the *Transfer of Land Act 1893* shall be registered against the Certificate of Title to the land the subject of the proposed development advising the owners and subsequent owners of the land that the subject site is located in close proximity to the Fremantle Port and may be subject to noise, odour and activity not normally associated with residential use. The notification is to be prepared by the City's solicitors at the expense of the owner and be executed by all parties prior to occupation.

32. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the Transfer of Land Act 1893 shall be registered against the Certificate of Title to the land the subject of the proposed development advising the owners and subsequent owners of the land that "this development is in the vicinity of a transport corridor and is affected, or may in the future be affected, by road and rail transport noise and vibration. Road and rail transport noise and vibration levels may rise and fall over time depending on the type and volume of traffic.". The notification is to be prepared by the City's solicitors at the expense of the owner and be executed by all parties prior to occupation.

Sustainability

33. Prior to the lodgement of a building permit application, a Green Star 'Designed' assessment from the Green Building Council of Australia (GBCA) demonstrating that the building's design has been assessed and is on track to achieve a minimum 4 Star Green Star Certified rating; OR, a Sustainable Design Assessment Report prepared by a practicing Green Star Accredited Professional (GSAP) as equivalence, is to be submitted to, and approved by the City of Fremantle.

34. Prior to occupation, a Green Star 'Certified' rating with certification from the Green Building Council of Australia (GBCA) confirming the building's design and construction achieve a minimum 4 Star Green Star Certified rating; OR a Sustainable Design Assessment Report prepared by a practicing Green Star Accredited Professional (GSAP) as equivalence, is to be submitted to, and approved by the City of Fremantle.

Public Art

35. Prior to the occupation of the development hereby approved, the owner shall contribute a monetary amount equal in value to one percent of the estimated development cost as indicated on the Form of Application for Planning Approval, to the City of Fremantle for development of public art works to enhance the public realm. Based on the estimated cost of the development being $110 million dollars the contribution to be made is $1.1 million dollars.

Liveable Housing

36. Prior to the issue of a building permit, amended development plans shall be submitted to the satisfaction of the City of Fremantle, which include a minimum of:

    i. 20 per cent of all dwellings, across a range of dwelling sizes, meet Silver Level requirements as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia), OR

    ii. 5 per cent of dwellings to be designed to Platinum Level as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia).

    The dwellings shall be maintained as such for the life of the development.

Water Metering

37. Prior to the issue of a building permit, details are to be submitted that demonstrate that each dwelling will be individually metered for water use to the satisfaction of the City of Fremantle.

38. Where any of the preceding conditions has a time limitation for compliance, if any condition is not met by the time requirement within that condition, then the obligation to comply with the requirements of any such condition (other than the time limitation for compliance specified in that condition), continues whilst the approved development continues.

Cantonment Street

39. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:
    - Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.
    - Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.

    Reason for Condition 39: condition is requested to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies

Advice Notes

i. A demolition permit is required to be obtained for the proposed demolition work. The demolition permit must be issued prior to the removal of any structures on site.

ii. A Building permit is required for the proposed Building Works. A certified BA1 application form must be submitted and a Certificate of Design Compliance (issued by a Registered Building Surveyor Contractor in the private sector) must be submitted with the BA1.

iii. The applicant is advised of the requirement to prepare a 'Planning Condition Schedule' that outlines how each of the above conditions have been addressed, with specific reference to plans and/or other supporting documentation where relevant and share this with officers to assist City officers in the process of clearance of relevant conditions.

    The applicant will need to submit an application for request for condition clearance and the pay the requisite fee to commence this process.

iv. This approval does not authorise the removal or modification of verge infrastructure and/or verge trees within the verge area. Written approval is to be obtained for removal or modification of verge infrastructure and/or verge trees within the verge area from the relevant City of Fremantle department or relevant service authority, before construction commences. Please refer to the City's Tree Planting and Vehicle Crossings Policies (SG28 and MD0015) for further information.

v. Prior to commencement of the development, or any works associated with the development, the applicant/owner is required to submit an application to the satisfaction of the Public Transport Authority (PTA) and must obtain approval from the PTA for works in and around the operating Railway Corridor in accordance with the PTA's 8810-450-003 – Procedure – Working In and around the PTA Rail Corridor, Assets and Infrastructure.

Clayton Higham
Presiding Member, Metro Inner DAP

vi. The development is within 50m of the PTA Railway Reserve, this places the proposed development within the PTA Protection Zone. An application to PTA third party access is required prior to the commencement of any development/construction works within the Protection Zone.

vii. The applicant is advised of the need to liaise with the Water Corporation to obtain and necessary approvals in relation to the development and the relocation/alteration of water infrastructure.

viii. The proponent must:

i. make application to Environmental Health Services via Form 1 - Application to construct, alter or extend a public building as a requirement of the *Health (Public Buildings) Regulations 1992*;
ii. once construction has been completed, make application to Environmental Health Services via Form 2 - Application for a public building certificate;

AND

iii. once construction has been completed, complete and submit Form 5 - Certificate of Electrical Compliance for a Public Building to Environmental Health Services.

Note that Section 1 does not apply to or in relation to building work, as defined in the *Building Act 2011* section 3, for which a building permit is required under that Act.

For further information and a copy of the application form contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

ix. The proponent must make application during the Building Permit application stage to Environmental Health Services via Schedule 3 – Application for registration of a lodging house as a requirement of the City of Fremantle's Health Local Laws 1997. For further information and a copy of the application form contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

x. The Co-Living Apartments in the proposal do not appear to be self-contained dwellings (i.e. residential flats). As such, their operation constitutes a lodging house under the *Health (Miscellaneous Provisions) Act 1911*. Facilities and services for the lodging house must adhere to the registration, design and management requirements detailed in the *Health (Miscellaneous Provisions) Act 1911* and the City's Health Local Laws 1997. In particular, please note and implement the design requirements for laundries, kitchen and dining room:

i. Laundry – 1 laundry unit consisting of a washing machine, wash trough and clothes dryer, for every 15 lodgers.
ii. Kitchen – minimum floor area of 0.65 square meters per lodger.



Clayton Higham
Presiding Member, Metro Inner DAP

iii. Cooking facilities – 2x ovens and 4x four burner stoves for the first 60 lodgers+ 1 four burner stove for each additional 15 lodgers (or part thereof) over the initial 60 lodgers.

iv. Dining Room – minimum floor area of 0.5 square meters per lodger with adequate furnishings to accommodate ½ the lodgers at any one time.

xi. The applicant is advised that a crossover permit must be obtained from the City's Engineering Department. New/modified crossover(s) shall comply with the City's standard for crossovers, which are available on the City of Fremantle's web site.

xii. The applicant is encouraged to maintain the adjacent verge in accordance with the City's Verge Garden Policy which can be found on the City website at: https://www.fremantle.wa.gov.au/resident-perks

xiii. If the development utilises an air-handling system as defined in AS 3666, which uses water or other liquids to operate, humidify, clean, maintain, heat or cool the air, the system must apply for, and obtain, approval for the air-handling system, water system or cooling tower, from the City of Fremantle as required under the *Health (Air-handling and Water Systems) Regulations 1994*. For further information contact Environmental Health Services on 9432 9856 or via health@fremantle.wa.gov.au.

xiv. Any removal of asbestos is to comply with the following –

Under ten (10) square metres of bonded (non-friable) asbestos can be removed without a license and in accordance with the *Health (Asbestos) Regulations 1992* and the *Environmental Protection (Controlled Waste) Regulations 2001*. Over 10 square metres must be removed by a licensed person or business for asbestos removal. All asbestos removal is to be carried out in accordance with the *Occupational Safety and Health Act 1984* and accompanying regulations and the requirements of the *Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC: 2002 (2005)]*. Note: Removal of any amount of friable asbestos must be done by a licensed person or business and an application submitted to WorkSafe, Department of Commerce. http://www.docep.wa.gov.au

xv. Effective measures shall be taken to stabilize sand and ensure no sand escapes from the property by wind or water in accordance with the City's Prevention and Abatement of Sand Drift Local Law.

xvi. If construction works involve the emission of noise above the assigned levels in the *Environmental Protection (Noise) Regulations 1997*, they should only occur on Monday to Saturday between 7.00 am and 7.00 pm (excluding public holidays). In instances where such construction work needs to be performed outside these hours, an *Application for Approval of a Noise Management Plan* must be submitted to the City of Fremantle Environmental Health Services for approval at least 7 days before construction can commence.

Note: Construction work includes, but is not limited to, Hammering, Bricklaying, Roofing, use of Power Tools and radios etc.

Clayton Higham
Presiding Member, Metro Inner DAP

xvii. All noise from the proposed development must comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* (as amended), such as:
1. mechanical service systems like air-conditioners, exhaust outlets, motors, compressors and pool filters;
2. vehicles;
3. amplified acoustic systems; and
4. patron noise.

It is advised to seek the services of a competent acoustic consultant to assist the applicant to address the potential noise impacts on noise sensitive receivers.

xviii. The premises must comply with the *Food Act 2008*, regulations and the Food Safety Standards incorporating AS 4674-2004 *Design, construction and fit-out of food premises*. Detailed architectural plans and elevations must be submitted to Environmental Health Services for approval prior to construction via an application to notify/register a food business. The food business is required to be registered under the *Food Act 2008*. For further information contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

xix. The applicant is advised that where contamination is detected, the site is required to be reported to the Department of Water and Environmental Regulation and remediated in accordance with the requirements of that Department. For further information, please see the Department fact sheet on Identifying and Reporting Contaminated sites available online at https://www.der.wa.gov.au/images/documents/your-environment/contaminated-sites/Fact_sheets_tech_advice/Fact_sheet_1.pdf

xx. The owner is advised that an obstruction permit will be required from the City for any future obstruction of the Goldsbroough, Elder or Cantonment Street road reserves. An application for obstruction permit can be found via www.fremantle.wa.gov.au.

xxi. The applicant/owner is advised that a verge bond deposit fee must be paid prior to the issue of a demolition permit or building permit. Details in regard to the verge bond can be found on the City's website at: https://www.fremantle.wa.gov.au/residents/trees-and-verges#Verge Bonds

xxii. The applicant is advised that the proposed works indicated outside of the lot boundaries of the subject site do not form part of this approval. Should the applicant wish to undertake these works separate approval is required from the City. Queries relating to these works should be directed to the City's Parks and Landscape team via info@fremantle.wa.gov.au or 9432 9999.

xxiii. The applicant is advised that any signage may be subject to a separate application for planning approval.

The applicant is advised, with regard to stormwater management, to implement an on-site stormwater management solution, to the maximum available capacity in line with the city's requirements.

Clayton Higham
Presiding Member, Metro Inner DAP

xxiv. With regard to the GBCA Green Star project registration and design assessment demonstrate sustainable built design performance requirements in accordance with Local Planning Policy 2.13.

A Green Star 'equivalency' self-assessment pathway requires a Sustainable Design Assessment Report aligned to the current GBCA Green Star Buildings rating tool, prepared by a practicing Green Star Accredited Professional (GSAP), and that includes, but is not limited to:

1. Statement of compliance that the building's design will achieve, or has achieved in construction, the performance requirements of a 4 Star Green Star building using the current GBCA Green Star Buildings rating tool.
2. A comprehensive report detailing the sustainability initiatives incorporated in the building design described in full with referenced supporting documentation.
3. A Green Star Scorecard matrix showing targeted credit points with detailed comments documenting how the credit is satisfied and referenced to supporting documentation.
4. Report author GSAP credentials.
5. Evidence to substantiate each credit claim and to demonstrate the level of performance as per the Green Star Buildings rating tool Submission Guidelines.
6. List of supporting documentation referencing information used such as calculators, modelling, specifications, contracts, brief requirements, client instructions, plans, reports, and drawings including working drawing stages.

Note 1: A Green Star 'equivalent' self-assessment pathway does not allow the building to be marketed or promoted as a Green Star building nor use the Green Star logo or trademark.

Note 2: Minimum expectations of the current Green Star Buildings rating tool need to be met. Partial points can not be awarded under Green Star 'Buildings' rating tool, and the total credit points targeted to include a reasonable buffer of points.

xxv. The GBCA Green Star final certification demonstrates sustainable built design and construction performance requirements in accordance with Local Planning Policy 2.13. The Green Star certification may be submitted within 2 years from practical completion of the project.

Green Star 'equivalency' self-assessment pathway requires a Sustainable Design Assessment Report aligned to the current GBCA Green Star Buildings rating tool, prepared by a practicing Green Star Accredited Professional (GSAP), demonstrating that the Green Star rating outcomes have been achieved for the building as constructed with a supporting documentation produced as part of the design, procurement, construction or commission process.

Note: A Green Star 'equivalent' self-assessment pathway does not allow the building to be marketed or promoted as a Green Star building nor use the Green Star logo or trademark.

xxvi. Any works within the adjacent thoroughfare, i.e. road, kerbs, footpath, verge, crossover or right of way, requires a separate approval from the City of Fremantle's Infrastructure Business Services department who can be contacted via info@fremantle.wa.gov.au or 9432 9999.

xxvii. Any existing tree(s) within the adjacent road reserve(s) shall be protected through the implementation of a Tree Protection Zone for protection during construction.

Additional information with regard to the tree protection zone requirements can be found here: https://www.fremantle.wa.gov.au/residents/trees-and-verges

xxviii. In relation to the contribution required for LPP 2.19 Contributions for Public Art and/or Heritage Works, the applicant is encouraged to continue working with the City of Fremantle, and are provided with the following guidance as to what is reasonable in complying with the policy:

- The required contribution shall not be spent on general urban or streetscape improvement works.

The contribution must:

- Include public art works for the purpose of providing public art within the locality or area of the development that are responsive to site and that draw on the cultural, social and historical context of place. These influences may include the existing skate culture and former wool trade for example; and/or
- Include heritage interpretation works associated with the conservation, restoration or interpretation of proximate public buildings, structures or places of cultural heritage significance (for example – former schools at Princess May Park). This does not include the subject development site; and/or
- Provide funds to be accrued for public art projects led by the City of Fremantle.

AMENDING MOTION 1

Moved by: Cr Andrew Sullivan **Seconded by:** Francesca Lefante

That Condition No. 12 be deleted and the remaining conditions be renumbered accordingly.

The Amending Motion was put and CARRIED UNANIMOUSLY.

REASON: The TIS prepared by Flyt concludes that the proposal introduces low traffic generation during the morning and afternoon peak periods, which result in minimal level of impact on the road network. Members were satisfied that an additional traffic study was not necessary.

Clayton Higham
Presiding Member, Metro Inner DAP

AMENDING MOTION 2

Moved by: Cr Andrew Sullivan **Seconded by:** Francesca Lefante

That Condition No. 36 (now Condition No. 35) be amended to read as follows:

Prior to the issue of a building permit, amended development plans shall be submitted to the satisfaction of the City of Fremantle, which include a minimum of:

i. 20 per cent of all dwellings, across a range of dwelling sizes, meet Silver Level requirements as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia), OR

ii. ii. 5 per cent of dwellings to be designed to Platinum Level as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia).

The dwellings shall be maintained as such for the life of the development. ***This condition does not relate to the co-living units on site.***

The Amending Motion was put and CARRIED UNANIMOUSLY.

REASON: To provide certainty and clarity that the provisions do not relate to the co-living elements, which are a residential building land use.

AMENDING MOTION 3

Moved by: Francesca Lefante **Seconded by:** NIL

That Condition No. 39 (now Condition No. 38) be deleted and the remaining conditions be renumbered accordingly.

The Amending Motion was put and LAPSED for want of a Seconder.

AMENDING MOTION 4

Moved by: John Syme **Seconded by:** Clayton Higham

The following amendments were made en bloc:

(i) That Condition No. 35 (now Condition No. 34) be amended to read as follows:

Prior to the occupation of the development hereby approved, the owner shall contribute a monetary amount equal in value to one percent of the estimated development cost, ***or otherwise approved by the City in accordance with Local Planning Policy 2.19,*** *as indicated on the Form of Application for Planning Approval, to the City of Fremantle for development of public art* ~~*works*~~*,* ***heritage and/or external public realm upgrade works*** *to enhance the public realm. Based on the estimated cost of the development being $110 million dollars the contribution to be made is $1.1 million dollars.*

Clayton Higham
Presiding Member, Metro Inner DAP

(ii) That the wording for Advice Note xxviii be deleted, with wording substituted in its place to read as follows:

In relation to Condition 34:

a) Should the Applicant provide a monetary amount to contribute to external public realm upgrade works, this shall be subject to the detailed design of the proposed public realm upgrades to be undertaken at the Applicants cost and subsequently endorsed by the City.

b) Should provision of physical public art be delivered by the Applicant, this should be provided on-site, reflect the cultural, social and historical context of the site, such as the skate culture and former wool trade, and should be visible to the public realm fronting either Cantonment or Goldsbrough Street.

The Amending Motion was put and CARRIED (3/2).

For: John Syme
Clayton Higham
Francesca Lefante

Against: Cr Andrew Sullivan
Cr Jemima Williamson-Wong

REASON: The majority of members supported the provision of Public Art within the public realm associated with the development uses and site form.

AMENDING MOTION 5

Moved by: Clayton Higham **Seconded by:** Francesca Lefante

That Condition No. 39 (now Condition No. 38) be amended to read as follows:

Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:

- ~~*Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.*~~
- ~~*Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.*~~
- ***To further consider the retention of the skateboard ledge, so it remains functional and, to the extent possible, having regard to the access needs of the development.***

Clayton Higham
Presiding Member, Metro Inner DAP

Reason for Condition 38: condition is requested to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies

The Amending Motion was put and LOST (3/2).

For: Clayton Higham
Francesca Lefante

Against: Cr Andrew Sullivan
Cr Jemima Williamson-Wong
John Syme

REPORT RECOMMENDATION (AS AMENDED)

That the Metro Inner DAP resolves to:

1. **Accept** that the DAP Application reference DAP/25/02837 is appropriate for consideration as "Multiple Dwelling", "Residential Building", "Office", "Restaurant/Café and "Tavern" land uses and compatible with the objectives of the zoning table in the City of Fremantle Local Planning Scheme No. 4

2. **Approve** DAP Application reference DAP/25/02837 and accompanying plans DA002 (Rev A), DA003 (Rev A), DA004 (Rev A), DA101 (Rev A), DA102 (Rev B), DA0103 (Rev B), DA0104 (Rev B), DA0105 (Rev B), DA0106 (Rev B), DA0107 (Rev B), DA0108 (Rev B), DA0109 (Rev A), DA0201 (Rev A), DA202 (Rev A), DA301 (Rev A), DA302 (Rev A), dated 3 January 2025 (City of Fremantle received date)) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015, and the provisions of the City of Fremantle Local Planning Scheme No. 4, subject to the following conditions:

Conditions

Validity / Works Forming Part of Approval

1. This decision constitutes planning approval only and is valid for a period of four (4) years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.

2. All works indicated on the approved plans, including any footings, shall be wholly located within the cadastral boundaries of the subject site.

Clayton Higham
Presiding Member, Metro Inner DAP

3. This approval does not relate to any proposed work(s) located outside of the cadastral boundaries of the subject site including the adjacent Goldsborough Street, Cantonment Street and Elder Place road reserves with the exception of awnings for weather protection. Any required or proposed works within these road reserves will be subject to separate approval from the City of Fremantle. Any costs associated with the design and construction of works within the road are to be borne by the landowner in full.

Materials / Finishes

4. Prior to the lodgement of a Building Permit application for the development hereby approved, final details of the external materials, colours and finishes of the proposed development, including a physical sample board or materials, is to be submitted and approved to the satisfaction of the City of Fremantle, on the advice of the City's Design Advisory Committee.

5. Prior to the lodgement of a Building Permit application for the development hereby approved, design plans for the location, materials and construction for screening of any proposed external building plant must be submitted to and approved by the City of Fremantle. All piped, ducted and wired services, air conditioners, hot water systems, water storage tanks, service meters, other plant and bin storage areas must be integrated into the design of the building and located to minimise any visual and/or noise impact on the occupants of nearby properties and screened from view from the street.

6. Prior to lodgement of a Building Permit application, storm water disposal and management plans, details and calculations must be submitted for approval by the City of Fremantle and thereafter implemented, constructed and maintained to the satisfaction of the City of Fremantle.

Landscaping / Tree Planting

7. Prior to the lodgement of a building permit application, the detailed landscaping plans shall be updated to the satisfaction of the City of Fremantle. Additional detail shall be provided with regards to deep soil areas, on-structure planting, species selection, tree planting and irrigation. The revised landscaping plans shall be submitted to, and approved by the City of Fremantle.

8. Prior to the occupation of the development, the approved landscaping plans shall be completed in accordance with the approved plans or any approved modifications thereto and be maintained for the life of the development, to the satisfaction of the City of Fremantle.

9. Prior to the occupation of the development, the proposed on-site tree planting (including the provision of 41 small trees) shall be completed in accordance with the approved plans or any approved modifications thereto, to the satisfaction of the City of Fremantle. All landscaped areas are to be maintained on an ongoing basis for the life of the development, to the satisfaction of the City of Fremantle.

Clayton Higham
Presiding Member, Metro Inner DAP

Lighting

10. Prior to the lodgement of a Building Permit application for the development hereby approved, an outdoor lighting plan must be submitted and approved by the City of Fremantle. The outdoor lighting is to be designed, baffled and located to prevent any increase in light spill onto the adjoining properties.

Parking and Traffic

11. Prior to the submission of a Building Permit, the applicant is to submit detailed plans for the provision of three (3) loading/service bays within the road reserves immediately adjacent the subject site for approval by the City of Fremantle.

    Prior to the occupation of the development hereby approved, the three (3) loading/service bays are to be constructed in agreement with the City of Fremantle. All costs associated with the design and construction of the parking bays are to be borne by the landowner in full.

12. Prior to the occupation of the development hereby approved, vehicle crossovers shall be constructed to the City's specification and thereafter maintained to the satisfaction of the City of Fremantle for the life of the development.

13. Prior to the occupation of the development hereby approved, any redundant crossovers shall be removed and the verge and kerbing reinstated to the City's specifications, at the expense of the applicant and to the satisfaction of the City of Fremantle.

14. Prior to occupation of the development hereby approved, a detailed Car Parking Management Plan shall be submitted to, and approved by the City of Fremantle. The approved car parking management plan shall be implemented for the life of the development unless otherwise approved.

15. Prior to the lodgement of a Building Permit for the development hereby approved, the applicant is to submit, and have approved to the satisfaction of the City of Fremantle, a detailed parking plan design which complies with the Australian Standard AS/NZS 2890 and AS/NZS 1428, including parking bay/s (comprising visitor bays, loading bays, disabled bays, motorcycle / scooter bays), aisle widths, circulation areas, driveway/s and points of ingress and egress.

16. Prior to occupation of the development hereby approved, all bicycle parking/racks shown on the approved plans shall be provided to the satisfaction of the City of Fremantle and must be installed and thereafter be maintained for the life of the development, to the satisfaction of the City of Fremantle.

17. Prior to the occupation of the development hereby approved, all car parking, bicycle parking, motorcycle/scooter parking and vehicle access and circulation areas shall be maintained and available for car parking/loading, and vehicle access and circulation on an ongoing basis to the satisfaction of the City of Fremantle.

18. Prior to the issue of a Building Permit for the development hereby approved, end of trip facilities shall be provided, to the satisfaction of the City of Fremantle as follows:

    - 3 male and 3 female (or 6 unisex) shower facilities for the non-residential uses, and four (6) lockers.

    Prior to occupation of the development the approved end of trip facilities must be installed and thereafter be maintained for the life of the development, to the satisfaction of the City of Fremantle.

Management Plans

19. Prior to occupation of the development hereby approved, a detailed Management Plan for the 'Co-Living' units and use shall be submitted to, and approved by the City of Fremantle. The management plans will outline operational management plans for the units and the operator, including, but not be limited to: access to units and car/bicycle bays for tenants, visitors, deliveries, mitigation of noise and other potential nuisance.

    The approved management plan shall be implemented for the life of the development unless otherwise approved.

20. Prior to the lodgement of a Building Permit application, an updated Waste Management Plan shall be prepared in accordance with advice from the City and subsequently be submitted to, and approved by the City of Fremantle.

    Prior to the occupation of the development, the approved waste management plan must be implemented and adhered to at all times to the satisfaction of the City of Fremantle unless otherwise approved by the City of Fremantle.

21. Prior to the lodgement of a Building Permit application, a and Demolition and Construction Plan shall be submitted and approved, to the satisfaction of the City of Fremantle addressing, but not limited to, the following matters:

    a) Use of City car parking bays for construction related activities;
    b) Protection of infrastructure and street trees within the road reserve;
    c) Security fencing around construction sites;
    d) Gantries;
    e) Access to site by construction vehicles;
    f) Contact details;
    g) Site offices;
    h) Noise - Construction work and deliveries;
    i) Sand drift and dust management;
    j) Waste management;
    k) Dewatering management plan;
    l) Traffic management;
    m) Works affecting pedestrian areas;
    n) Asbestos removal management plan;

o) Dilapidation reports of nearby properties; and
p) Any other matter deemed to be relevant by the City of Fremantle.

The approved Demolition and Construction Management Plans shall be adhered to throughout the demolition of the existing building on site and construction of the new development.

Heritage

22. Prior to the lodgement of a Building Permit, the following information and/or additional detail, pertaining to the 1927 State Registered building, is to be provided to the satisfaction of the City of Fremantle on the advice of the Heritage Council of Western Australia:

    i. All columns and beams to the 1927 building to be retained to maximum extent, inclusive of the proposed internal courtyard/lightwell area currently proposed for demolition, to the satisfaction of the Director, Historic Heritage Conservation.
    ii. All original external signage is to be retained and exposed.
    iii. The following further information is to be provided to the satisfaction of the Director, Historic Heritage Conservation, prior to the application of a Building Permit:
        a. Further details of the proposed ramps and external landscaping to Goldsborough St.
        b. Further information of proposed works, and associated impact on heritage fabric, required to comply with the National Construction Code.
        c. An Interpretation Plan for the Elders Wool Store that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent use of the place by the Western Australian and international skateboarding community.
        d. Prior to application for an Occupancy Permit, a signage strategy that provides for a coordinated approach for tenancy and wayfinding signage is to be provided to the satisfaction of the Director, Historic Heritage Conservation. The strategy is to include method of fixing, location, dimensions, and design for new signage.

23. Prior to the submission of a Building Permit application, the following further information and detail is to be submitted to, and approved by the City of Fremantle:

    i. A detailed Conservation Plan for the entire building.
    ii. A conservation methodology which specifically details the immediate protection, management and conservation, the during demolition and during construction protection, management and conservation and the ongoing protection, management and conservation of the retained heritage fabric, relocated heritage fabric, interpretation elements and machinery.
    iii. A detailed archival record of the entire building photographing and noting in detail the location, type and condition of all material to be demolished and all material to be reused.

iv. A detailed plan for the retention / relocation / conservation and interpretation of all machinery, chutes and signage that are related to the wool use of the building.
v. A detailed schedule of materials and finishes.

24. Prior to the submission of an occupation of the development hereby approved, the following further information and detail is to be submitted to, and approved by the City of Fremantle:

i. The full implementation of the conservation methodology as per the City of Fremantle approved Conservation Methodology plan.
ii. The installation of all interpretation elements as per the City of Fremantle on the advice of the Director, Historic Heritage Conservation, DPLH approved Interpretation Plan.
iii. The retention / relocation / conservation and interpretation of all machinery, chutes and signage that are related to the wool use of the building as per the City of Fremantle approved plan.

Acoustics and Noise

25. Prior to the lodgement of a Building Permit application for the development hereby approved, details of how the recommendations contained in the Acoustic Report (prepared by Lloyd George Acoustics Pty Ltd, ref. 242028739) are to be implemented, are to be submitted to, and approved by the City of Fremantle. The measures shall be constructed, implemented and maintained for the life of the development. Any necessary works require additions, alterations and/or treatments of existing heritage building fabric, will require details to be submitted to, and approved by the City of Fremantle, prior to the commencement of such works.

26. Prior to the lodgement of a Building Permit application for the development hereby approved, details are to be submitted and approved by the City of Fremantle that demonstrate that the development incorporates the noise mitigation 'Quiet House Requirements' Category (A) of Table 2 of the State Planning Policy 5.4 'Road and Rail Noise Guidelines', or designs and implements an approved noise management plan by a qualified acoustic consultant, to the satisfaction of the City of Fremantle.

27. Prior to the lodgement of a Building Permit application for the development hereby approved, the design and materials of the development shall demonstrate compliance with the requirements set out within City of Fremantle policy LPP 2.3 - Fremantle Port Buffer Area Development Guidelines for properties contained within 'Area 2'.

28. Prior to the lodgement of a Building Permit application for the residential development hereby approved, the design and materials of the development is to demonstrate adherence to the requirements set out within City of Fremantle Local Planning Policy 2.18 – New Residential Developments in the City Centre Zone – Noise from an Existing Source. Specifically, the development shall provide the following, at a minimum:

a) to all external openings (windows and doors):
   i. airtight rubber seals to provide acoustic protection; and
   ii. sliding windows shall be substituted with awning windows as they are able to achieve a positive compression seal; and
   iii. standard 6mm glass shall be substituted with sealed thickened laminated glass (no less than 10mm); or
   iv. standard 6mm glass shall be substituted with acoustic double glazing incorporating a 12mm thick pane of laminated glass set in a sealed metal frame with a 100mm air gap to the other pane of glass;

b) to all external walls:
   i. shall achieve a sound rating of Rw 45 dB or greater;

c) to all floors and ceilings:
   i. A 150mm thick concrete slab with either carpet or acoustically installed timber flooring or tiles; or
   ii. Installing high density insulation batts into the cavity of a lightweight, suspended and floating ceilings or floors to absorb sound; or
   iii. Building components are isolated using resilient compounds such as rubber, neoprene or silicone for the purpose of reducing the transfer of noise.

Notifications on Titles

29. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the *Transfer of Land Act 1893* shall be prepared to the satisfaction of the City of Fremantle and registered against the Certificate of Title of every residential dwelling, to notify owners and prospective purchasers of any dwelling that the land is located in the City Centre and in close proximity or adjacent to, an area where non-residential uses may exist or be approved and, as a result, the land may be affected by activities and noise not normally associated with residential development. All costs and incidentals relating to the preparation of and registration of the Section 70A notification, including related City of Fremantle Solicitors' costs, shall be met by the owner of the land.

30. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the *Transfer of Land Act 1893* shall be registered against the Certificate of Title to the land the subject of the proposed development advising the owners and subsequent owners of the land that the subject site is located in close proximity to the Fremantle Port and may be subject to noise, odour and activity not normally associated with residential use. The notification is to be prepared by the City's solicitors at the expense of the owner and be executed by all parties prior to occupation.

Clayton Higham
Presiding Member, Metro Inner DAP

31. Prior to occupation of the development hereby approved, a Notification pursuant to Section 70A of the Transfer of Land Act 1893 shall be registered against the Certificate of Title to the land the subject of the proposed development advising the owners and subsequent owners of the land that "this development is in the vicinity of a transport corridor and is affected, or may in the future be affected, by road and rail transport noise and vibration. Road and rail transport noise and vibration levels may rise and fall over time depending on the type and volume of traffic.". The notification is to be prepared by the City's solicitors at the expense of the owner and be executed by all parties prior to occupation.

Sustainability

32. Prior to the lodgement of a building permit application, a Green Star 'Designed' assessment from the Green Building Council of Australia (GBCA) demonstrating that the building's design has been assessed and is on track to achieve a minimum 4 Star Green Star Certified rating; OR, a Sustainable Design Assessment Report prepared by a practicing Green Star Accredited Professional (GSAP) as equivalence, is to be submitted to, and approved by the City of Fremantle.

33. Prior to occupation, a Green Star 'Certified' rating with certification from the Green Building Council of Australia (GBCA) confirming the building's design and construction achieve a minimum 4 Star Green Star Certified rating; OR a Sustainable Design Assessment Report prepared by a practicing Green Star Accredited Professional (GSAP) as equivalence, is to be submitted to, and approved by the City of Fremantle.

Public Art

34. Prior to the occupation of the development hereby approved, the owner shall contribute a monetary amount equal in value to one percent of the estimated development cost, or otherwise approved by the City in accordance with Local Planning Policy 2.19, as indicated on the Form of Application for Planning Approval, to the City of Fremantle for development of public art works, heritage and/or external public realm upgrade works to enhance the public realm. Based on the estimated cost of the development being $110 million dollars the contribution to be made is $1.1 million dollars

Liveable Housing

35. Prior to the issue of a building permit, amended development plans shall be submitted to the satisfaction of the City of Fremantle, which include a minimum of:

    i. 20 per cent of all dwellings, across a range of dwelling sizes, meet Silver Level requirements as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia), OR

    ii. 5 per cent of dwellings to be designed to Platinum Level as defined in the Liveable Housing Design Guidelines (Liveable Housing Australia).

    The dwellings shall be maintained as such for the life of the development. This condition does not relate to the co-living units on site.

Water Metering

36. Prior to the issue of a building permit, details are to be submitted that demonstrate that each dwelling will be individually metered for water use to the satisfaction of the City of Fremantle.

37. Where any of the preceding conditions has a time limitation for compliance, if any condition is not met by the time requirement within that condition, then the obligation to comply with the requirements of any such condition (other than the time limitation for compliance specified in that condition), continues whilst the approved development continues.

Cantonment Street

38. Prior to the lodgement of a building permit, a revised plan for the Cantonment Street elevation shall be provided that demonstrates the following to the satisfaction of the City of Fremantle:
    - Replacement of the glazed doors for the southern most F+B/Retail outlet with fixed glazing, and entry to the tenancy to be taken from the central lobby.
    - Replacement of the glazed doors for the second F+B/Retail outlet with fixed glazing, retention of the ledge in front of the opening, and entry to the tenancy to be taken from the central lobby.

    Reason for Condition 38: condition is requested to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies

Advice Notes

i. A demolition permit is required to be obtained for the proposed demolition work. The demolition permit must be issued prior to the removal of any structures on site.

ii. A Building permit is required for the proposed Building Works. A certified BA1 application form must be submitted and a Certificate of Design Compliance (issued by a Registered Building Surveyor Contractor in the private sector) must be submitted with the BA1.

iii. The applicant is advised of the requirement to prepare a 'Planning Condition Schedule' that outlines how each of the above conditions have been addressed, with specific reference to plans and/or other supporting documentation where relevant and share this with officers to assist City officers in the process of clearance of relevant conditions.

The applicant will need to submit an application for request for condition clearance and the pay the requisite fee to commence this process.

iv. This approval does not authorise the removal or modification of verge infrastructure and/or verge trees within the verge area. Written approval is to be obtained for removal or modification of verge infrastructure and/or verge trees within the verge area from the relevant City of Fremantle department or relevant service authority, before construction commences. Please refer to the City's Tree Planting and Vehicle Crossings Policies (SG28 and MD0015) for further information.

v. Prior to commencement of the development, or any works associated with the development, the applicant/owner is required to submit an application to the satisfaction of the Public Transport Authority (PTA) and must obtain approval from the PTA for works in and around the operating Railway Corridor in accordance with the PTA's 8810-450-003 – Procedure – Working In and around the PTA Rail Corridor, Assets and Infrastructure.

vi. The development is within 50m of the PTA Railway Reserve, this places the proposed development within the PTA Protection Zone. An application to PTA third party access is required prior to the commencement of any development/construction works within the Protection Zone.

vii. The applicant is advised of the need to liaise with the Water Corporation to obtain and necessary approvals in relation to the development and the relocation/alteration of water infrastructure.

viii. The proponent must:

i. make application to Environmental Health Services via Form 1 - Application to construct, alter or extend a public building as a requirement of the *Health (Public Buildings) Regulations 1992*;
ii. once construction has been completed, make application to Environmental Health Services via Form 2 - Application for a public building certificate;

AND

Clayton Higham
Presiding Member, Metro Inner DAP

iii. once construction has been completed, complete and submit Form 5 - Certificate of Electrical Compliance for a Public Building to Environmental Health Services.

Note that Section 1 does not apply to or in relation to building work, as defined in the *Building Act 2011* section 3, for which a building permit is required under that Act.

For further information and a copy of the application form contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

ix. The proponent must make application during the Building Permit application stage to Environmental Health Services via Schedule 3 – Application for registration of a lodging house as a requirement of the City of Fremantle's Health Local Laws 1997. For further information and a copy of the application form contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

x. The Co-Living Apartments in the proposal do not appear to be self-contained dwellings (i.e. residential flats). As such, their operation constitutes a lodging house under the *Health (Miscellaneous Provisions) Act 1911*. Facilities and services for the lodging house must adhere to the registration, design and management requirements detailed in the *Health (Miscellaneous Provisions) Act 1911* and the City's Health Local Laws 1997. In particular, please note and implement the design requirements for laundries, kitchen and dining room:

i. Laundry – 1 laundry unit consisting of a washing machine, wash trough and clothes dryer, for every 15 lodgers.
ii. Kitchen – minimum floor area of 0.65 square meters per lodger.
iii. Cooking facilities – 2x ovens and 4x four burner stoves for the first 60 lodgers+ 1 four burner stove for each additional 15 lodgers (or part thereof) over the initial 60 lodgers.
iv. Dining Room – minimum floor area of 0.5 square meters per lodger with adequate furnishings to accommodate ½ the lodgers at any one time.

xi. The applicant is advised that a crossover permit must be obtained from the City's Engineering Department. New/modified crossover(s) shall comply with the City's standard for crossovers, which are available on the City of Fremantle's web site.

xii. The applicant is encouraged to maintain the adjacent verge in accordance with the City's Verge Garden Policy which can be found on the City website at: https://www.fremantle.wa.gov.au/resident-perks

xiii. If the development utilises an air-handling system as defined in AS 3666, which uses water or other liquids to operate, humidify, clean, maintain, heat or cool the air, the system must apply for, and obtain, approval for the air-handling system, water system or cooling tower, from the City of Fremantle as required under the *Health (Air-handling and Water Systems) Regulations 1994*. For further information contact Environmental Health Services on 9432 9856 or via health@fremantle.wa.gov.au.

Clayton Higham
Presiding Member, Metro Inner DAP

xiv. Any removal of asbestos is to comply with the following –

Under ten (10) square metres of bonded (non-friable) asbestos can be removed without a license and in accordance with the *Health (Asbestos) Regulations 1992* and the *Environmental Protection (Controlled Waste) Regulations 2001*. Over 10 square metres must be removed by a licensed person or business for asbestos removal. All asbestos removal is to be carried out in accordance with the *Occupational Safety and Health Act 1984* and accompanying regulations and the requirements of the *Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC: 2002 (2005)]*. Note: Removal of any amount of friable asbestos must be done by a licensed person or business and an application submitted to WorkSafe, Department of Commerce. http://www.docep.wa.gov.au

xv. Effective measures shall be taken to stabilize sand and ensure no sand escapes from the property by wind or water in accordance with the City's Prevention and Abatement of Sand Drift Local Law.

xvi. If construction works involve the emission of noise above the assigned levels in the *Environmental Protection (Noise) Regulations 1997*, they should only occur on Monday to Saturday between 7.00 am and 7.00 pm (excluding public holidays). In instances where such construction work needs to be performed outside these hours, an *Application for Approval of a Noise Management Plan* must be submitted to the City of Fremantle Environmental Health Services for approval at least 7 days before construction can commence.

Note: Construction work includes, but is not limited to, Hammering, Bricklaying, Roofing, use of Power Tools and radios etc.

xvii. All noise from the proposed development must comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* (as amended), such as:

1. mechanical service systems like air-conditioners, exhaust outlets, motors, compressors and pool filters;
2. vehicles;
3. amplified acoustic systems; and
4. patron noise.

It is advised to seek the services of a competent acoustic consultant to assist the applicant to address the potential noise impacts on noise sensitive receivers.

xviii. The premises must comply with the *Food Act 2008*, regulations and the Food Safety Standards incorporating AS 4674-2004 *Design, construction and fit-out of food premises*. Detailed architectural plans and elevations must be submitted to Environmental Health Services for approval prior to construction via an application to notify/register a food business. The food business is required to be registered under the *Food Act 2008*. For further information contact Environmental Health Services on 9432 9999 or via health@fremantle.wa.gov.au.

xix. The applicant is advised that where contamination is detected, the site is required to be reported to the Department of Water and Environmental Regulation and remediated in accordance with the requirements of that Department. For further information, please see the Department fact sheet on Identifying and Reporting Contaminated sites available online at https://www.der.wa.gov.au/images/documents/your-environment/contaminated-sites/Fact_sheets_tech_advice/Fact_sheet_1.pdf

xx. The owner is advised that an obstruction permit will be required from the City for any future obstruction of the Goldsbroough, Elder or Cantonment Street road reserves. An application for obstruction permit can be found via www.fremantle.wa.gov.au.

xxi. The applicant/owner is advised that a verge bond deposit fee must be paid prior to the issue of a demolition permit or building permit. Details in regard to the verge bond can be found on the City's website at: https://www.fremantle.wa.gov.au/residents/trees-and-verges#Verge Bonds

xxii. The applicant is advised that the proposed works indicated outside of the lot boundaries of the subject site do not form part of this approval. Should the applicant wish to undertake these works separate approval is required from the City. Queries relating to these works should be directed to the City's Parks and Landscape team via info@fremantle.wa.gov.au or 9432 9999.

xxiii. The applicant is advised that any signage may be subject to a separate application for planning approval.

The applicant is advised, with regard to stormwater management, to implement an on-site stormwater management solution, to the maximum available capacity in line with the city's requirements.

xxiv. With regard to the GBCA Green Star project registration and design assessment demonstrate sustainable built design performance requirements in accordance with Local Planning Policy 2.13.

A Green Star 'equivalency' self-assessment pathway requires a Sustainable Design Assessment Report aligned to the current GBCA Green Star Buildings rating tool, prepared by a practicing Green Star Accredited Professional (GSAP), and that includes, but is not limited to:

1. Statement of compliance that the building's design will achieve, or has achieved in construction, the performance requirements of a 4 Star Green Star building using the current GBCA Green Star Buildings rating tool.
2. A comprehensive report detailing the sustainability initiatives incorporated in the building design described in full with referenced supporting documentation.
3. A Green Star Scorecard matrix showing targeted credit points with detailed comments documenting how the credit is satisfied and referenced to supporting documentation.
4. Report author GSAP credentials.

Clayton Higham
Presiding Member, Metro Inner DAP

5. Evidence to substantiate each credit claim and to demonstrate the level of performance as per the Green Star Buildings rating tool Submission Guidelines.
6. List of supporting documentation referencing information used such as calculators, modelling, specifications, contracts, brief requirements, client instructions, plans, reports, and drawings including working drawing stages.

Note 1: A Green Star 'equivalent' self-assessment pathway does not allow the building to be marketed or promoted as a Green Star building nor use the Green Star logo or trademark.

Note 2: Minimum expectations of the current Green Star Buildings rating tool need to be met. Partial points can not be awarded under Green Star 'Buildings' rating tool, and the total credit points targeted to include a reasonable buffer of points.

xxv. The GBCA Green Star final certification demonstrates sustainable built design and construction performance requirements in accordance with Local Planning Policy 2.13. The Green Star certification may be submitted within 2 years from practical completion of the project.

Green Star 'equivalency' self-assessment pathway requires a Sustainable Design Assessment Report aligned to the current GBCA Green Star Buildings rating tool, prepared by a practicing Green Star Accredited Professional (GSAP), demonstrating that the Green Star rating outcomes have been achieved for the building as constructed with a supporting documentation produced as part of the design, procurement, construction or commission process.

Note: A Green Star 'equivalent' self-assessment pathway does not allow the building to be marketed or promoted as a Green Star building nor use the Green Star logo or trademark.

xxvi. Any works within the adjacent thoroughfare, i.e. road, kerbs, footpath, verge, crossover or right of way, requires a separate approval from the City of Fremantle's Infrastructure Business Services department who can be contacted via info@fremantle.wa.gov.au or 9432 9999.

xxvii. Any existing tree(s) within the adjacent road reserve(s) shall be protected through the implementation of a Tree Protection Zone for protection during construction.

Additional information with regard to the tree protection zone requirements can be found here: https://www.fremantle.wa.gov.au/residents/trees-and-verges

xxviii. In relation to Condition 34:

a) Should the Applicant provide a monetary amount to contribute to external public realm upgrade works, this shall be subject to the detailed design of the proposed public realm upgrades to be undertaken at the Applicants cost and subsequently endorsed by the City.

b) Should provision of physical public art be delivered by the Applicant, this should be provided on-site, reflect the cultural, social and historical context of the site, such as the skate culture and former wool trade, and should be visible to the public realm fronting either Cantonment or Goldsbrough Street.

The Report Recommendation (as amended) was put and CARRIED UNANIMOUSLY.

REASON: The proposal is consistent with the planning framework, location context and enhancing the character of the area. The development is considered a positive adaptive re-use and reconfiguration of this significant heritage site. The building modification and removal of some elements' fabric have been assessed as appropriate, balancing the mix of uses which contribute to the future vibrant use of the building.

PROCEDURAL MOTION

Moved by: Cr Andrew Sullivan **Seconded by:** Francesca Lefante

That the meeting be adjourned for a period of 5 minutes.

The Procedural Motion was put and CARRIED UNANIMOUSLY.

REASON: To allow members a comfort break.

The meeting was adjourned at 2:14pm.
The meeting was reconvened at 2:19pm.

Clayton Higham
Presiding Member, Metro Inner DAP

3.2 Lot 116 (No.47) Pakenham Street, Fremantle - Mixed Use Development – DAP/25/02841

Deputations and Presentations

Katrina Cinanni addressed the DAP in support of the recommendation for the application at Item 3.2 and responded to questions from the panel.

Frank Tyson addressed the DAP against the recommendation for the application at Item 3.2.

Kate Pearson addressed the DAP in support of the recommendation for the application at Item 3.2.

Stacey Towne addressed the DAP in support of the recommendation for the application at Item 3.2 and responded to questions from the panel.

Pamela Cattalini addressed the DAP in support of the recommendation for the application at Item 3.2.

Ben Doyle and Felipe Soto (Planning Solutions) addressed the DAP in support of the recommendation for the application at Item 3.2 and responded to questions from the panel.

The panel noted a written submission in support of the recommendation for the application at Item 3.2. was received from John Dowson (The Fremantle Society).

The City of Fremantle addressed the DAP in relation to the application at Item 3.2 and responded to questions from the panel.

REPORT RECOMMENDATION

Moved by: Cr Andrew Sullivan **Seconded by:** Cr Jemima Williamson-Wong

That the Metro Inner DAP Name resolves to:

1. **Accept** that the DAP Application reference DAP/25/02841 is appropriate for consideration as a “Multiple Dwelling and Restaurant/Café” land use and compatible with the objectives of the zoning table in accordance with the City of Fremantle Local Planning Scheme No. 4.

2. **Refuse** DAP Application DAP/25/02841 and accompanying plans (attachment SD1-00 (Rev. D), SD1-01 (Rev. D), SD1-02 (Rev. N), SD2-01 (Rev. Q), SD2-02 (Rev. N), SD2-03 (Rev. N), SD2-04 (Rev P), SD2-05 (P), SD2-06 (Rev. M), SD3-01 (F), SD3-02 (E), SD3-03 (E), SD4- 01 (Rev. H), SD4-02 (Rev. A), SD5-01 (Rev. Q)) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the provisions of the City of Fremantle Local Planning Scheme No. 4 for the following reasons:

Clayton Higham
Presiding Member, Metro Inner DAP

a. The application is not consistent with the requirements of Schedule 7, Local Planning Area 1 (Sub Area 1.3.1) in relation to the proposed additional building heights that do not satisfy the requirement of cl. 1.2(b) of Schedule 7 as the side parapet walls will be detrimental to the character and amenity of the adjoining properties and the locality.

b. The application is not consistent with all of the LPS4 requirements of cl. 4.8.1.1 in relation to the additional building heights as the side parapet walls do not satisfy the requirement of sub clauses (a) and (b) as the cause a detrimental impact on the adjoining properties and fail to graduate the additional heights relative to the surrounding lower height buildings.

PROCEDURAL MOTION

Moved by: Francesca Lefante **Seconded by:** Cr Jemima Williamson-Wong

That the consideration of DAP Application DAP/25/02841 be deferred for up to 120 days, in accordance with section 5.10.2a of the DAP Standing Orders 2024, for the following reasons:

Further information and plans are to be provided to address the following:

- The impacts on the adjoining sites 45 & 49a Pakenham Street against the provisions as set out in LPS4 Cl 4.8.1.1 and Sch 7 City Centre Area 1, Cl 1.3.1.
- Extent of variation / discretion sought on the site, inclusive of plans showing impact.
- Local context and character of the build form.
- Any associated modification to mitigate impacts.

The Procedural Motion was put and CARRIED (4/1).

For: Francesca Lefante
Clayton Higham
Cr Jemima Williamson-Wong
Cr Andrew Sullivan

Against: John Syme

REASON: For further information relating proposal compliance with the provisions of LPS4 Cl 4.8.1.1 and Sch 7 City Centre Area 1, Cl 1.3.1 and the merits of the exercise of discretion sought on the site. This is also an opportunity for the applicant to review the potential amenity impacts on the neighbouring properties and consider whether there are some appropriate modifications to the proposed development to minimise those impacts.

Clayton Higham
Presiding Member, Metro Inner DAP

4. Form 2 DAP Applications

Nil.

5. Section 31 SAT Reconsiderations

Nil.

Clayton Higham
Presiding Member, Metro Inner DAP

PART D – OTHER BUSINESS

1. State Administrative Tribunal Applications and Supreme Court Appeals

The DAP noted the status of the following State Administrative Tribunal Applications and Supreme Court Appeals:

Current SAT Applications				
File No. & SAT DR No.	**LG Name**	**Property Location**	**Application Description**	**Date Lodged**
DAP/22/02317 DR81/2023	City of Vincent	41-43 and 45 Angove Street, North Perth	Proposed Service Station	31/05/2023
DAP/24/02688 DR191/2024	City of South Perth	No 44 (Lot 15) Park Street, Como	Proposed Childcare Premises	16/12/2024
DAP/20/01911 DR192/2024	Town of Cambridge	Lot 800 (29-33) Northwood Street, West Leederville	Three storey care premises and associated office	16/12/2024

2. Meeting Closure

There being no further business, the Presiding Member declared the meeting closed at 3:42pm.

Clayton Higham
Presiding Member, Metro Inner DAP

This document was produced on Whadjuk Noongar Boodjar

Schedule of Public Consultation Submissions – DAP Form 2 – Elders Wool Stores – DAPV002/25

Date Commenced: 31 July 2025

Date Ended: 18 August 2025

Total Submissions Received: 114 Submissions

Consultation Method: Letters to previous submitters

Ref#	Comments
1.	As a member of the Fremantle skateboarding community I absolutely DO NOT support the appeal or removal of Condition 38. This will ultimately destroy the unique social and cultural heritage developed by the skating community and honestly it may end up costing more in protecting whatever will take the ledges place as a huge proportion of fremantle and skaters around perth will be deeply saddened by the destruction of a staple of fremantle. People have been skating this spot for decades and has launched many skaters careers in pro skating or videography/photography. DO NOT turn this spot into a memory.
2.	I have noticed you have suddenly pulled the rug on the save woolstores action. If it wasn't for the last 2 years that is skaters have got are point across to the council that this ledge has been skated for over 30 years. The history of Fremantle is dying at the act of prioritising money over what Fremantle is. Don't cut the best part of the ledge don't ruin what people have
3.	I strongly oppose the appeal to remove Condition 38 from the redevelopment of the Elders Wool Stores. This condition is vital to preserving the site's cultural heritage, functionality, and international significance as a skateboarding landmark. Removing it would permanently undermine the value of this space for skateboarders, Fremantle, and visitors worldwide. If Fremantle can use skateboarding images in their THIS IS FREMANTLE campaign, it makes sense for the council to uphold this community's contributions and dismiss the appeal. The argument that retaining 85% of the ledge is sufficient overlooks a critical fact: the 1.6m section slated for removal is the most used and most important part of the facade. Its uninterrupted form and lack of obstructions make it unique. Losing this section would effectively destroy the spot, stripping it of international relevance and erasing a key element of Fremantle's cultural identity. Condition 38 was introduced to protect this heritage and was approved through due process. Overturning it now would erode community trust and set a dangerous precedent where financial interests override cultural and community outcomes. The skateboarding community won this vote, and it must be respected.
4.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. Drawing on xxx mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable.

	This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their

	Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by Fremantle Shipping News, The passage from the article: xxx of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'
5.	I wanted to address my concerns regarding the Redevelopment of the Elder Wool Stores, specifically the Human-Urban's (H-U) appeal of Condition 38. In short, I oppose the appeal, whereby the door on the southernmost part will be removed, and would like the redevelopment to maintain its decision made at the last meeting in April. I hope you take into consideration this decision because it contradicts the efforts made in the past for the previous outcome. The decision to appeal Condition 38 by H-U undermines the efforts made by the Western Australia Skateboarding Association (WASA), Woolstores Forever committee and the public in advocating for the preservation of the Woolstores ledge. Over the past year, I have used my time to join their efforts in showing support by attending council meetings and creating social media posts (which can be viewed on my Substack article and Instagram post). To see hours of efforts being undone by the wider community, because a private corporation has decided to appeal the decision, contradicts the wider community sentiment and the decision of the Fremantle Council. Please take into consideration my concerns regarding the appeal of Condition 38 made by H-U.
6.	Including condition 38 will undo all of our work from this year and effectively ignoring how hard we have worked. The main ledge cannot go. This is the most important part of the ledge for us skateboarders. It would mean a lot to keep this section. #woolstoresforever
7.	I'm xxx from japan This is the spot where I first went skateboarding in Australia. It's a memorable place where I made some great friends and it's a spot I've always seen in skateboarding videos. Please preserve this legacy.
8.	As a member of the skateboarding community, who has been skating Woolstores for over 20 years, I DO NOT support the appeal or removal of Condition 38.

	The Woolstores ledge is an iconic part of the Perth skate community and has been one of the main reasons international skateboarders visit Perth. If skateboarding is not protected at Woolstores, Fremantle will lose a valuable cultural asset.
9.	As a member of the Perth skateboarding community for over 20 years with large amount of my time on a skateboard spent at Woolstores it is obvious to me that if you remove the condition 38 you mammary as well not keep any of the iconic skate spot intact . I would like to think there is a way both parties could be happy with an alternative idea as it would be very disappointing to see such an important part of my culture and many others come to an end .
10.	I do not support the appeal or removal of Condition 38. Whilst I understand most of the Ledge is being retained, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I believe Condition 38 its in current form provides a balanced heritage outcome between the wool history of the site and the more modern and undeniable skateboarding history related to the site and the ledge. Cutting the ledge in front of the window to turn it into a food and beverage retail doorway will ultimate ruin the skateboarding spot. Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. The Cantonment Street facade doesnt need so many entries and exits - I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced.
11.	I write to strongly oppose the appeal by Human Urban to remove Condition 38. The heritage of the Elders Wool Store is not only in its architecture but also in its living cultural use. For almost forty years, the skateboarding community has given life, identity, and international recognition to this building. This long-standing use is now part of the heritage fabric of the site and cannot be separated from its historic value. Condition 38 is essential to preserve both the building's heritage and the cultural contribution of the skateboarding community. To remove the most skated and significant ledge would erase decades of community use, adversely to Fremantle's reputation as a cultural destination, and prioritise private economic gain over enduring cultural value. Fremantle Council has an opportunity to protect a heritage that is both architectural and social, ensuring the Wool Stores continue to serve the wider community rather than become hollowed out by commercial compromise. Heritage and activation can work together, but only if Condition 38 is retained in full. I urge you to reject this appeal and safeguard the community's role in Fremantle's cultural story.
12.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed.
13.	As a lifelong member of the Fremantle community and the skateboarding community I DO NOT support the appeal or removal of Condition 38 in the DAPV002/25 development application. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban (H–U) are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. It is highly disappointing, albeit not surprising, that H–U is trying to appeal Condition 38, after spruiking a positive PR campaign highlighting their flexibility and community engagement to cater to all parties, only to turn around and try to quietly reneg on said positive engagement. In their appeal H–U stated that their proposal "navigates and balances a number of complex elements to produce a cohesive, mixed-use precinct that accommodates sub-cultural (skateboarding), while promoting hospitality and retail offerings to align with the aspirations of the City of Fremantle…." The removal of Condition 38 would be in essence removing the accomodation of sub-cultural activities, as it is the most iconic and most skated part of the Woolstores ledge, essentially rendering the entire space un-skataeble. It would seem as though H–U is merely paying lip-service to truely being open to collaborating in a meaningful way with the community members opposed to the destruction of a culturally and historically important part of Fremantle's infrastructure, in favour of the most financially bolstering outcome for their development. There needs to be a point where money doesn't always win-out. This is about protecting our community and protecting third-spaces within Fremantle that are very important to promoting a rich, thriving and diverse community environment. Condition 38 provides a balanced heritage and future-forward outcome, preserving both the Wool History of the early 20th century, the unique cultural history of the skateboarding community that has developed there over the last 40

	years, and opportunity for a vibrant new precinct to all exist cohesively. Condition 38 should remain and not be removed. I am not denying the importance of developing spaces that are long left under-utilised, however there needs to be consideration of who is being forced out of a space that they have embraced and utilised for over 4 decades. This is Skaters vs Goliath, and it is the job of our council to protect community members and help create true, fair compromise. In this case the compromise is keeping Condition 38. The precinct will still make money. They'll still have multiple entries on that side of the building. I ask what is losing two doors in comparison to losing an important part of Fremantle's sub-cultural history? I truely hope all members of the Council weigh this heavily, and deeply considers the destructive impact on community spirit and engagement that appealing Condition 38 will have.
14.	As a member of WAs thriving arts ecology, I do not support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more MUST be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. Or needs to be retained as a functional element of the buildings ongoing cultural import, and ongoing cultural heritage, not as a tokenistic 'museological' element. Skateboarding and 'street culture' is a very important part of Fremantle's history and cultural capital. In recent history there has been a huge loss of skateable spaces in the name of 'progress' in the urban environment and it is critical that we do not loose another, especially one as iconic and special as the Woolstores ledge. A successful appeal of Condition 38 will directly cause this to happen. And we cannot let it!
15.	Please consider the following key points: 1. **Condition 38 protects a living cultural heritage site.** The Woolstores ledge has been an iconic and internationally recognised skateboarding spot for nearly 40 years. Its cultural and social significance to the skateboarding community locally, nationally, and internationally cannot be overstated. Not to mention the core significance of the skate scene in Fremantle's own cultural fabric and positive impact this community has on young locals and the wider community. The condition ensures this heritage is preserved meaningfully, not just visually. 2. **Removing the 1.6m section of ledge will destroy its functionality.** This section is the most important and most frequently skated part of the entire facade. It is the longest uninterrupted and safest section of the ledge. Turning it into a retail entry would fundamentally damage the space's use and legacy as a skate spot. 3. **The developer's appeal misrepresents facts and disregards community input.** The appeal includes incorrect data about facade percentages, misleading claims about activation impacts, and ignores the longstanding significance of skateboarding at the site. Furthermore, no new evidence has been presented, and this appeal undermines decisions already made by Fremantle Council and the Inner Metro DAP in April 2025. 4. **Condition 38 supports a balanced, safe, and inclusive public realm.** The condition does not prevent retail activation but instead ensures skateboarders and pedestrians can safely share the space. It protects the last active, long-term community stakeholder group at the site which is an important part of local heritage and community, and supports continued cultural activation post-redevelopment. Condition 38 was introduced to reflect and protect Fremantle's unique cultural identity. Its removal would be a significant loss to the city's heritage and to one of its most recognisable cultural communities. I urge you to reject the appeal and uphold Condition 38 in full.
16.	As a member of the skateboarding community, I strongly oppose the appeal and removal of Condition 38. While I acknowledge that much of the Cantonment Street ledge is being retained, Condition 38 is essential to ensure the space remains skateable and culturally significant—not simply preserved as a static "museum piece." Condition 38 strikes a balanced heritage outcome: it protects both Fremantle's wool industry history and the 40-year cultural history of the skateboarding community. Cutting the 1.6m window ledge for a retail doorway would irreparably damage this spot. This section is the most skated and culturally significant part of the Wool Stores—removing it will diminish its international reputation and tourism value. Evidence from xxx's mapping, HU's own survey footage, and the WA Skateboarding Association's video history confirm that the southern portion (where the appeal targets) is the most important and most used section. HU's survey, conducted only in cooler months, is incomplete and unrepresentative of year-round use. Mayor Fitzhardinge included Condition 38 specifically to preserve skateability and avoid pedestrian–skater conflicts. Removing it risks increased collisions, reduces activation of Cantonment Street, and undermines Fremantle's cultural capital. Six doorways across a 100m façade is excessive; turning 20% of the frontage into retail access will further compromise safe skateboarding use. The skateboarding connection to Wool Stores is iconic for Fremantle—alongside the port and wool industry, it represents a defining part of the city's cultural heritage. A successful appeal would destroy this history and erode Fremantle's reputation as a cultural destination. Importantly, HU's appeal introduces no new evidence; it simply seeks to overturn prior decisions by Fremantle Council (9 April 2025) and the Inner Metro DAP (29 April 2025). Their arguments are contradictory and dismissive of skateboarding's recognised cultural value, even as the Heritage Council of WA considers amending the building's heritage listing to formally include the skateboard ledge. Condition 38 does not prevent retail activation. Rather, it ensures that skateboarding—a long-standing, internationally recognised part of Fremantle's identity—remains at Wool Stores. To remove it would be a serious cultural loss.

	For these reasons, I urge you to uphold Condition 38 and protect the unique social and cultural heritage of Fremantle's skateboarding community.
17.	I was very pleased with the outcome of the initial DA regarding the Woolstores development, particularly including Condition 38 which would allow for some ongoing use of the iconic skate ledge into the building's future. I don't believe there are grounds for appeal here given the extensive consultation / back-and-forthing that seemed to have gone on regarding this element of the development, as well as a very lengthy and heated council session which resulted in the approval and inclusion of the condition. Going back on this seems to completely disregard all that effort that everyone involved put in (from all sides) and is a clear attempt by the developer to revoke this aspect now that momentum has died down, trying to slip this change back in without as much media / community coverage. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. After much fanfare, Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. This goes against the strong democratic process that was originally held, where all voices were able to be heard. The precedent this sets is that rich developers can leverage council to revoke previous decisions and that rules are able to reconsidered if you have enough local sway. Something to be highly weary of, please reconsider this appeal.
18.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight?

14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset.
15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained.
16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application.
17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant.
18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel.
19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation.
20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time.
21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it.
22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice.
23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development.
24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle.
25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38.
26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day.
27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU.

	28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. 29. Point 2 of the Conclusion is factually incorrect and misleading. ”The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA.” HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building’s 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. 30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: ‘A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.’*
19.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. Skateboarding and ‘street culture’ is an important part of Fremantle’s history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don’t lose another one. A successful appeal of Condition 38 will directly cause this to happen. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU’s minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the “skateboarding sympathetic” businesses HU are sourcing as tenants. Using data as a ‘gotchya moment’ to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38.
20.	1. As a member of the skateboarding community, I do not support the appeal or removal of Condition 38. While I acknowledge that a majority of the ledge along the Cantonment Street façade is being retained, further action is needed to ensure that both the ledge and the surrounding space remain genuinely skateable — something that Condition 38 directly supports. To date, Human Urban has not formally agreed or committed to the space continuing to operate as a skate spot. Their repeated assurance that 85% of the ledge will be retained, while noted, does not guarantee its functionality or accessibility for skateboarding. This feature must be preserved not merely as a physical remnant, but as a living, functional part of the building’s cultural heritage — not relegated to the status of a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Removing the 1.6m section of ledge in front of the window to create a food and beverage retail doorway would ultimately compromise — and effectively destroy — the skateboarding spot. This change would erase a unique layer of social and cultural heritage cultivated by the skateboarding community over the past 40 years, a legacy that has not been adequately acknowledged by the developer. This particular section of ledge is the most significant and most frequently skated part of the entire Woolstores site. Its uninterrupted length and absence of window sills or other protrusions make it uniquely safe and functional — unlike the northern portion or the 1950s section of the building, which Human Urban suggests will become the new longest continuous ledge. That alternative, however, does not offer the same usability or historical relevance. Eliminating this small yet vital stretch of ledge would cause substantial harm to the site’s integrity, diminishing both its practical value and its international standing within the skateboarding community. Drawing on Sylvain Tognelli’s mapping of the ledge’s use by skateboarders (as referenced in Human Urban’s Landscape Design Report), along with their own survey footage, a compelling case can be made that the southern portion of the ledge holds the greatest significance. This area includes the two doorways currently under appeal.

	The West Australian Skateboarding Association's Video History Timeline provides clear and irrefutable documentation of the ledge's use, highlighting the window ledge and adjacent southern sections as the most culturally valuable elements of the site. These portions — which are at risk of removal or alteration due to the appeal of Condition 38 — are the most frequently used and most important to the local, national, and international skateboarding communities. Opening the southernmost entry and removing the ledge in front of the window would undermine the integrity of the Woolstores as a globally recognised skateboarding destination. Such changes would not only diminish its cultural relevance but also negatively impact Fremantle's international reputation and future tourism potential. 4. The survey conducted by Human Urban has not been made publicly available and therefore lacks the transparency and detail required to be taken seriously. Moreover, it was carried out during May and June — a period marked by cooler, wetter weather when the space is typically less active. 5. The West Australian Skateboarding Association believes that, for the survey to be considered accurate and valid in the context of any planning application or appeal, it should be conducted daily over a minimum period of one year. Skateboarder activity at the site fluctuates seasonally, with peak usage occurring during the summer months. 6. Following redevelopment of the building, and assuming skateboarding-friendly retailers occupy the spaces as Human Urban has suggested, the number of skateboarders using the ledges impacted by Condition 38 is expected to rise significantly. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site.
21.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally.
22.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I personally have enjoyed seeing the skateboarding community use this space over many years. If their space is removed you are losing a key element of Fremantle's culture. Furthermore, it appears the research conducted about the usage of the space was conducted off peak season, skewing the results and not an accurate representation of the spaces value.
23.	I'm writing to show my support for the retention of the Woolstores ledge as a world-famous skate spot. It has been skated for decades and is still culturally relevant today - it's show in professional skateboard videos and magazines which is the stamp of approval from the skateboarding community. Please review (and deny) the proposed window cut out location as it would irrevocably disrupt the function of the most popular section of the ledge. The Woolstores skate community are passionate and want to make sure there is a fair and equitable solution that is mutually beneficial to all parties. Please keep this vital part of history alive!
24.	I am sending this email as a member of both the Fremantle and skateboarding community. Hearing that Human Urban has appealed Condition 38 is very disappointing and concerning as it suggests that H-U has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been under-appreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen.

	This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. Let's keep working together to ensure that the Woolstores and the skate ledge are able to be developed and preserved far into the future.
25.	As a longtime member of both the skateboarding community and the City of Fremantle I do NOT support the appeal or removal of Condition 38. Please keep Condition 38. The most famous iconic section of the building to the skateboarding community is the windowsill ledge and Condition 38 protects this. This long uninterrupted section here is the most used and loved section. Removing this section of ledge to create an opening will significantly damage the spot, reducing its functionality and its significance internationally. It will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years. Human Urban have not formally committed to the redeveloped space continuing to function as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional, skateable element of the building's cultural heritage, so it can continue being utilised by the skateboarding community. I believe Human Urbans appeal comes across as misleading and seems to suggests that the City of Fremantle does not support the condition where in fact the the condition was submitted by City of Fremantle Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skate-ability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Then on the 29/04/2025 the Inner Metro Development Assessment Panel discussed the importance of Condition 38 and voted in favour of keeping Condition 38. I would be very disappointed to see Condition 38 potentially removed after it has already been discussed and supported by the local community, the City of Fremantle and the Inner Metro Development assessment Panel. Please keep Condition 38 and deny the appeal.
26.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a testament to the past. Since the H-U survey was done in the off season I think it has minimal clout. This spot has been used by tens of thousands over the years. The fact that this ledge has risen into global notoriety is due to its amazing length and uninterruption. The sections they want to cut out will result in a dysfunctional skate spot. We can't let the severing of the ledge happen.
27.	The ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and most aesthetically pleasing part of the ledge. Keeping this section intact would actually benifit the flow of all skaters as most people will land there trick then be shot out away from the roller shutter doors. Rather then trying to skate a section before or after the window which would create a more harmful route for the public. The window itself is the main recognised part of the ledge. Many people know it as the basic logo of woolstores. I support the refurbishment of the original heritage openings on cantonment street they should not all be functional doorways especially the window section. Condition 38 should remain The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community. I have skated this window ledge for 20 years and keeping the section would be a huge win for everyone including the public as would actually make it safer for pedestrians. Having people coming in and out of such a skinny opening is not a great idea. However having the roller shutter section could work as there would be more room for viewing pedestrians and avoiding any collisions. Unfortunately as this is one of the last real street plazas in the world if the ledge became unskateable I would have no reason to come to fremantle . As aware fremantle is a ghost town due to the rent price and unaffordabilty. Alot of shops sitting empty for years Still waiting for the upmarket a to reopen.
28.	Condition 38 strikes an appropriate balance, safeguarding both the wool stores heritage of the early 20th century and the distinctive cultural history of the skateboarding community that has flourished there for more than four decades. For this reason, Condition 38 should be retained and not removed
29.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece.

	2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders.
30.	I am writing in response to Human Urban's request to remove Condition 38 from their development application. To me, this appeal shows there has been no meaningful collaboration between Human Urban and skateboarders on this design since the JDAP meeting. Furthermore, the appeal does not seem to offer any arguments that haven't already been covered, at length, at a local and state level. I suspect, as a councillor, you find this frustrating. How much time and money would been saved - from public servants, councillors, city planners, H/U staff, and everyday employees like me - if H/U worked with directly with the community here? As shown on their website, H-U claims they "promotes inclusivity, encourages collaboration and welcomes different ways of thinking". Please hold them accountable to this, and encourage them to bring forward a solution, together with skateboarders, that meets the needs of both parties. Like the majority of Fremantle residents, I support the revitalisation and want this site to be developed. If the Amendment 38/39, as proposed by Mayor Fitzhardinge, truly stops the viability of the development, there is another solution. It is getting H-U and skateboarders together to co-design a space and, together, bring forward a design that suits both parties. Please don't let fear tactics from this developer (like they will not develop the space) sway decisions that have already been made: these concerns could have been raised at at the original JDAP meeting. I am sure the skateboarding community would happily work with the developer to find a creative solution.
31.	As a member of the skateboarding community in Fremantle and understanding the impact that this spot has both domestically and globally, I really DO NOT support the appeal or removal of Condition 38. and think that there is no way the spot stays a cultural spot with this change. even ignoring the fact that it disrupts flow of skateboarders and shoppers, it feels like two steps backwards from previous protests and agreements, and does not bode well for the future of the spot. less skateboarders means less culture and less culture means less people drawn to the area. what is the meaning of removing a historic part of a historic spot and still saying that you (HU) cater to the scene?
32.	As a mother who's son has shown a keen interest in skateboarding. I do not support the appeal or removal of condition 38. I understand that most of the ledge along Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and space surrounding remains skateable by Condition 38 remaining. Condition 38 provides a heritage outcome that preserves both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has grown and developed over the last 40 years.

	As someone who is new to skateboarding culture, I feel that the ledge is an important skating spot in WA, which should be preserved and allow up and coming skteboarders to enjoy. So much of Perth historical sites have been loss, let's not make the ledge another one on the list. Please do not remove condition 38.
33.	I'm totally against getting rid of Condition 38. Even though the developer says they're keeping most of the ledge, they haven't actually promised to keep it skateable. That's why Condition 38 is so important—it keeps the spot a real, functional piece of history, not just a decoration. Taking out that small but crucial 1.6-meter section for a doorway would kill the spot. That specific part is the most skated and safest section of the whole ledge, and losing it would ruin a spot that's been a huge part of the local skate scene for 40 years. Condition 38 is a fair compromise that protects both the building's history and our culture, so it should definitely stay. I would ask you to sincerely consider the effect this would have on the skating community.
34.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. This is incredibly important to so many people of the Fremantle community and therefore hope it is considered carefully.
35.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced.
36.	I am writing to voice my strong opposition to Human Urban's appeal to the Council's decision to retain the ledge at the old Woolstores building for skateboarder use. Not only will the proposed change mar one of the oldest and longest ledges in the world, the position of the proposed doorway will place pedestrians in danger of collision. It does not take a great leap of the imagination to consider whether this is a deliberate move on the par of HU to inevitably cause conflict between skateboarders and pedestrians, resulting in grounds to suspend skater access on grounds of safety concerns. Skateboarding, and particularly skateboarding at the Woolstores is one of the iconic aspects that makes Fremantle Fremantle. The building has a rich cultural heritage that needs to be preserved and HU knew this when they took on the project. They need to held to account on the decision reached by the council after the public consultation. This is the will of the people and we look to Fremantle Council to uphold our interest in good faith. To waiver now is to open the door to further changes and lose what we have fought to preserve. If we lose Woolstores; we lose a part of Freo.
37.	write to strongly oppose Human Urban's application to amend or remove Condition 38 of the Woolstores Development Approval in Fremantle. Condition 38 is essential to preserving the dual heritage of the Woolstores, both its industrial past and its cultural significance as one of the most important skateboarding sites in Australia. Human Urbans claim (in the DA report) is misleading. The 1.6m portion of the ledge that they propose to cut would mean the removal of the most significant, most skated and culturally valuable section of the ledge; rendering it largely unskateable. This action would be in direct opposition with Fremantle Mayor Hannah Fitzharding's inclusion of condition 38, specifically to ensure "ongoing stability" and a safe coexistence between skaters and pedestrians. Its removal will

	create conflict between street users, and erase a significant part of both Fremantle's, and global, skating history and culture. The ledge at Woolies is much more than a heritage museum piece of the Woolstores building history, it is an active and internationally recognised community asset. I support the refurbishment of the original heritage openings on Cantonment Street, however it is not necessary for them to all be functional. Instead, the entries on the 1927 portion of the building should be condensed from 3 to 1, and condition 38 should remain in place. I am extremely disappointmented in HU's appeal of condition of 38, as it shows that they have no interest in incorporating the concerns of the community into their design proposals. In a climate where developers are consistently prioritising profit over built heritage and community desires, this is unacceptable and will undoubtedly have significant detrimental impacts on the skating community as well as broader communities. Condition 38 is necessary to strike the right balance between heritage protection, safe activation, and community use. For these reasons, I urge you to uphold it in full.
38.	The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle.
39.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. Please reconsider your approach and save skateboarding - Woolstores and community forever!
40.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning

	application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant.
41.	I am writing in support of the application to amend the development approval for the above property by removing Condition 38. As someone who grew up skateboarding and still occasionally skates at the Woolstores spot, I initially felt conflicted about this proposal. However, after reading through the material and giving the issue careful thought, I've come to the view that removing Condition 38 is ultimately the best path forward - for both the preservation of the Elders Woolstores and the long-term future of the site, including the skate ledges. There is a very real risk that Condition 38 could contribute to the developer, HU, choosing not to proceed with the project. I can imagine heritage redevelopment of this scale is expensive, complex, and fraught with unexpected challenges. If it were easy or guaranteed to be lucrative, more of these projects would be happening, yet we've seen many heritage buildings, like the old Treasury Buildings in Perth, sit empty for many many years. In reality, it is often easier and cheaper to demolish and build new - buildings that typically lack the character and significance of a site like Elders Woolstores. Having an original heritage doorway closed off might seem like a small thing at first but this particular doorway is so important (when you consider the length of that wall and the need for movement in and out of the different areas/tenancies) it could be the factor that makes the difference. This development is so exciting and offers new housing in Fremantle which is critically needed along with many spaces that can be accessed and enjoyed by the public. This factor cannot be understated. Should HU decide not to proceed, it's highly likely that the Woolstores building will continue to deteriorate, potentially to the point where it becomes unsafe and is closed off entirely. In that scenario, no one (including the skate community) will be able to access it. I was genuinely surprised to learn how much HU engaged with the skateboarding community from the outset and was willing to retain the majority of the ledge as part of their plans. Given that, I think their request to remove a 1.6-metre section of the ledge to re-open one of the heritage doorways is a reasonable compromise, especially when weighed against the benefit of saving such an iconic building. This development presents a unique opportunity to revitalise a special part of Fremantle while preserving an important piece of the city's heritage. I believe it deserves our full support.
42.	1. I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as

	evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. 18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. 19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. 20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. 21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. 22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. 23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour

	of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. 24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. 25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. 27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. 28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. 29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. 30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*
43.	To retain the skate-ability and cultural meaning this building has provided for many young Freoians, WAians and Australians and international travelers who abide to rise and for those future riders who will keep this heritage alive. They can have their development, but please compromise by keeping our ledge skateable. We're the underdog with chipped boards. We may break our boards but please don't break our dreams
44.	I'd like to express my concern regarding the application for removal of condition 38 on DAPV002/25. The ledge in question is of monumental importance to the Fremantle skate community. One of its defining features is the uninterrupted length — an element that would be lost if interrupted for door access, rendering it functionally redundant. I would also question the basis of surveys suggesting the ledge is under-utilised. If these were conducted during business hours (9–5, weekdays), or in the quieter winter months, the results wouldn't reflect true usage. Anecdotally, the ledge attracts regular use on evenings and weekends, with several skaters typically present. As a local, I've spent many afternoons watching them from Clancy's Fish Pub. It's clearly a vibrant part of Fremantle's character. Finally, I'd highlight that the positive relationship described between the developers and the skate community was based on a design inclusive of condition 38. The proposal itself outlines how skate culture is intended as a drawcard for tenants and community alike — yet removing condition 38 would undermine that entirely, and risk alienating the very group it seeks to attract. For these reasons, I strongly urge the committee to reject the removal of condition 38.
45.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. This section of ledge under the beautiful and iconic window should not be removed. If you are skateboarding in a line you will intersect with this section of ledge every time, whether you are skateboarding from the clancy's end or the goldsborough street end.

	It is also the lowest section of ledge (by a few millimetres) and has the smoothest concrete in my opinion, which is great for kids coming down for their first time. It may be only 1.6 metres they want to cut from the ledge, but it would be like cutting a football field in two and having a walkway in the middle. 1.6 metres is nothing. But in the middle of a footy field it is completely unreasonable. To have people walking on the outer edges of a footy field again is not nearly as impactful/unsafe as in the centre of the field. It is also the section of the ledge which makes the best photographs as there are usually spectators in this area sitting on the ledge watching skaters on the ledge, with the iconic window in the background. This spot is really the heart and soul of what remains of this world renowned building. The reason Woolstores is known on the other side of the world is because of Skateboarding, and those skateboarders who have consistently worked to protect this space. Please protect our precious 1.6 metres. Thank you for your support.
46.	I am writing today, as a member of the Fremantle Community, Integrated Spatial Designer, and Human-led Urbanism advocate, that **I DO NOT support the appeal or removal of Condition 38** by Human Urban. This condition removal, as you already know, is specifically about the Ledge used by skateboarders in the global skateboarding community. While it appears that the ledge will be maintained in certain areas, it is quite obvious through the application process of the initial development, that more needs to be done to ensure the space remains functional for urban users of the space — in this case, skateboarding, which can only happen if Condition 38 stays in place. It appears the developer in this situation has made no commitment to maintaining the space as aspace where skateboarders can use moving forward—instead leaving a percentage of the obstacle/structures original size. Through discussion on previous Spatial projects with the skateboarding community — much like any other public space — there is a 'way' to move through it, use it, and for it' to have functional and spatial integrity. It appears that HU is actively working against the spatial integrity of the site for this community group, and therefore removing the spatial agency of its users, who are believed to have been using the space in this way for nearly 40 years. From the perspective of urban design, It's vital that the ledge remains a functional part of the building's cultural heritage, not a relic. We, as a society, and specifically you, Government Public Servants: for the preservation of cultural heritage, not just in Australia, but around the world, **have ONE chance to protect and maintain this cultural asset**. Once destroyed, it cannot be replaced, rebuilt, or otherwise. There is one opportunity to maintain the integrity of one of Western Australia's premier cultural sporting assets, (and a champion of contemporary Public Space Activation — well ahead of its time), and one opportunity only. The Fremantle Council, a reflection of the wider community, chose to maintain this integrity. The DAP State panel also chose to maintain this integrity. A developer, with seemingly no interest beyond economic, especially through its arguably boring, and uninspired Development proposal (another issue altogether) has decided to try again, after being told no twice — hoping to spin the Pokie wheel once more until they get what they desire. Instead of taking this information, and listening to the wider community's needs, (that they state they are working closely with), and responding by looking for alternative solutions — they have proceeded to expend their energy towards doing the opposite, providing no evidence of alternatives and hoping for a changed outcome. It actively works against what good development, and good urbanism champions — using the community, listening to the community and responding to the community, to make informed urban design decisions. I urge the city, much like Fremantle already has, to take a broader look and step back; as this appeal doesn't reflect the views of the Fremantle community, the Fremantle Council, or the DAP. It is unfortunately only the property developer pushing for a different outcome, with no new evidence or reasons to support their case. A successful appeal would invalidate the decisions made by both the Fremantle Council and the DAP. Through the appeal letter that I have read, It's become obvious that H-U are not interested in working with the community or respecting the decisions that were already made at two government levels, which is such a shame coming from such a large developer, who claims to work with the community for community focussed outcomes. Their appeal fails to provide any new information that would justify removing Condition 38. I also find it strange from a Design standpoint, that HU's Most awarded previous development, the '*State Buildings*' In Perth, uses a single entry doorway system, but are clearly stating that this fundamentally isn't something viable. It's lazy, contradictory, and shows that they have decided to take the design position of Top-Down hierarchical urban planning, rather than a more contemporary, Bottom-Up, and human-led approach to urban design — stated in the company's name. It's obvious that a Cultural group's urban use of public space has been an integral part of not only Western Australian sporting history, but the Sport's global history as well. Contemporary urban design around the world begs to mimic what already exists in this space — attempting to recreate what has been lost in other urban centres around the world, Such as Brooklyn Banks in New York City, and Love Park in Malmo, Sweden (where Bricks from a similar famous skateboarding space, known as 'Love Park', Philadelphia USA were transported to recreate the famous skate spot lost to Development. in Philadelphia's Downtown urban square). Fremantle has been documented as a premier urban space that allows the spatial integrity of multiple users, including skateboarding, and it appears the city is known around the world for it as well. The skateboarding community at Woolstores is an integral part of not just Fremantle's, but Western Australia's, and the World's sporting, and urban history. Mayor Fitzhardinge and the wider Fremantle Council have long recognised Skateboarders as the cultural custodians of the space, using it for almost 40 years. This group's continued presence maintains the cultural heritage of this space when it has been long overlooked, and HU's attempts to upend this legacy, and through poor design decisions, remove it for good. Condition 38 strikes the right balance between preserving the Wool Store's historical significance and honouring the cultural importance of the skateboarding community. The condition appears to ensure the space maintains spatial agency for the skateboarding community, while allowing multiple urban users to navigate the space safely as well. If the condition is removed, it would lead to conflicts of how the space is used, and remove the cultural and tangential integrity of the space itself.

	The Burra Charter, is used in many situations such as what is occurring here, simply explains that places of cultural significance should retain their uses. The skateboarding space on the Cantonment Street facade is clearly important to the Skateboarding community, yet it hasn't been properly considered in the Developers plan, even after the Heritage council of Western Australia has the Site under Heritage consideration for the use of skateboarding. Once again, this works actively against the people and community that the developers say they are designing for. Once again, this is another blatant contradiction. I question the integrity of this development organisation the more I read through the development plans and proposal documents, in addition to the Appeal Proposal. It's a shame that an organisation, with both the words Human, and Urban In their name, are actively working against the most basic principles of Human led, Urban design. If this appeal is successful, it singularly damages the cultural significance of not just the building, but of the City of Fremantle, and Western Australia. It removes the spatial agency of a key stakeholder group, key members of the community, who have been using the space for over 40 years — whom, for the literal definition of the word, have been largely marginalised to these urban edges of our cities — using spaces deemed as little value, and making them special, important, and culturally significant. I hope to see this integral part of the urban fabric of Fremantle and Western Australia maintained in its usable form, and that this can be integrated in the continued activation of cantonment Street Precinct. **This cannot be achieved by the appeal or removal of Condition 38.** I appreciate you taking the time to review this letter and hope these words heed value in the coming days and weeks.
47.	I'm writing in response to the H-U's recent appeal of condition 38. I myself have live by and skateboarded at the Elders Woolstores Ledge ("woolies") for 20 years. Being only 27 and yet still a younger generation to all skateboarders who've situated themselves around this historical skateboarding sight, I feel able to speak to this matter with conviction. This is a cultural centrepiece, Woolies holds monumental significance to skateboardings history and every growing community, not just locally, but globally. The efforts that have gone into preserving this ledge have been far reaching and inspiring, and although still not meeting the understood ideals of skateboarders worldwide, maintaining all but one opening prior to this appeal was an incredible outcome. So to hear there has been appeal to this is simply disappointing, a classic example of what is said and what is stuck to. The portion of ledge threatened by the appeal of condition 38 is the most utilised and significant. To remove/destroy it would be a devastating loss, for us the loss of a fundamental part of what makes this historical skateboarding location useable and allows flow of use. And a substantial loss of trust for the governing body's of the building and cantonment street precinct redevelopment. I myself was responsible for coordinating the three large scale activations of the site in March 2024 which yielded a phenomenal community response, the proceeding actions and efforts made by woolstores forever organisation have significant and highly commendable, the initial outcome was, albeit a compromise, a success for the interaction of community and government. Let's not see the balance tip, how this development in relation to skateboarding is handled from here forward is of utmost importance. I trust the protection of this ledge and its surrounding, its current culture and community and history will be prioritised in the face of aesthetics and one insignificant doorway.
48.	I am writing to oppose Human Urban's appeal to the Council's decision to retain the ledge at the old Woolstores building. The appeal of the decision and proposal by Human Urban to only partially retain the ledge and remove part of the central section install an entrance creates several issues. Woolstores ledge is known worldwide for being one of the oldest and longest skateable ledges. Removing a section will cause irrevocable damage to the ledge, meaning this icon of skateboarding will be lost. Skateboarding culture is an integral part of Fremantle's culture that gives the city its unique appeal. The need to preserve this part of Fremantle's cultural heritage has been considered by the Council and was acknowledged in its decision following consultation with the public. Woolstores is one of the last remaining skateboarding street spots. With the Beach Street skatepark being neglected by the council and other skateparks in Fremantle lacking suitable ledges, Woolstore is an important feature for up and coming talent in the area to hone their skills. It is noteworthy that in addition to the considerations above, placing an entrance in this part of the building creates a safety risk as it's design forces avoidable collisons and potential injuries to both skateboarders and pedestrians. This appeal proposal is either negligent or a deliberate act to make the ledge unskateable in the long run. after I trust that Fremantle Council will uphold it's original decision made after public consultation and continue to place the interests of Fremantle and the communities over those of Human Urban.
49.	We all want development, but we also want a home that we can be proud of that does not only think of colonialists, old buildings at culturally significant. Be brave.
50.	I have a relatively loose understanding of how specific activities build an economy, and I can understand the perspective that new developments offer opportunity for growth - that developers spend their working life researching an immaculate pitch which demonstrates how their shiny new thing is going to benefit the community, but they are not the community. And I am going to make an assumption here, based on my loose understanding, that their pitch is profit driven - and they are going to go to lengths to protect and increase that profit. I am not a developer. I am a community member, who is a ratepayer at the City of Fremantle. I purchased my first home in Fremantle because it is a unique, progressive and warm place. City of Fremantle also understands who they are, as stated on their website, "a vibrant city in Western Australia offering rich cultural experiences, community services, and business opportunities." Vibrancy and culture is at the heart of Fremantle, and maintaining these stories is an important aspect of this place - especially as a UNESCO World Heritage city. The preservation of important sites is core to tourism, heritage and people. The current appeal from Human Urban of Condition 38 is an attempt to undermine the protection of a site that continues to be utilised by a large portion of the community. While I do not skate, I have many friends who have and still do use this skate ledge. I often come by on an afternoon with my son to say hey, sit down and have a conversation in the

	afternoon. Friends from the city travel to Fremantle to use it. It is well documented in skate films, and known internationally by other members of the skateboarding community. Retail stores and new developments can be found anywhere. I am not that excited for a new building, and new shops - it doesn't make the city interesting. People aren't going to travel to Freo to go to (insert whatever shop is being proposed here). But, the maintenance of the ledge doesn't even impede on the ability for stores to go ahead and thrive - all that is being asked is that the spot is maintained, while also offering a very reasonable negotiation where the development also goes ahead, but with the community who already use this space in mind. If community is not at the forefront of the developers mind, maintaining history, protecting what makes Fremantle unique - these are all important aspects. Please reconsider, there will be many existing community members upset by this decision, and something special and important removed - there is nothing to be lost by upsetting a developers doorway. They can move it, and still get what they want - but not at the expense of trading a storefront for a cultural asset.
51.	Firstly I'd like to state my name xxx, graphic designer from Boorloo now residing in Naarm. A few points from the top of my head, These ledges need to stay.. ever since I was 10 years old I've remembered how iconic Fremantle is because of the woolstores but most importantly the ledges which graced the woolstores. They are an icon.. People have travelled the world for these ledges and to see them go would be an extremely sad day for Fremantle and skateboarding as a community. It's important to recognise these ledges as not just copping on a half metre tall slab of concrete but to see them as a significant landmark of Fremantle which has brought people together for decades and it would be a damn shame to end such an important part of people's lives. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the “skateboarding sympathetic” businesses HU are sourcing as tenants. Using data as a ‘gotchya moment’ to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38.
52.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 1. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950’s section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli’s mapping of the ledge’s use by skateboarders (referenced in HU’s Landscape Design Report) as well as Human Urban’s survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association’s Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the “ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies.” Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain.

	9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. 18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. 19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. 20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. 21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. 22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. 23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. 24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle.

	25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. 27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. 28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. 29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. 30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*
53.	As a long-term Fremantle resident and part of the skateboarding community, I am deeply concerned by Human Urbans appeal of Condition 38 in regards to the Woolstores building development. Condition 38 allows for a combination of heritage retention while embracing the skateboarding community that has given the Woolstores building its unique character over the past 40 years. Removal of Condition 38 will undeniably remove the functionality of the Woolstores ledge as a skateboarding spot, one that has become internationally renowned and brought people to Fremantle from all over the world. I know that there can be an outcome here that supports the heritage development while also retaining the features that are important to skateboarders across WA, however the removal of Condition 38 will greatly hinder this. Many cities worldwide have embraced skateboarding into the development of heritage infrastructure and areas with great success. These spaces have gone on to become vibrant social and retail hubs, that promote active lifestyles, while also allowing community to enjoy the areas heritage values. I believe Fremantle has a great opportunity here to do the same. Please don't make the mistake of removing Condition 38, as this will inevitably ruin the chances of successfully integrating skateboarding into the building's development plans. Skateboarders have been the most important stakeholder in the Woolstores building for over 40 years now and the building has been instrumental in making the Australian skateboarding scene what it is today. I hope the voices of the community are able to be heard on this matter
54.	I'm part of the Perth skate community and I don't support the appeal or removal of Condition 38. Even if most of the ledge is kept, it has to stay skateable — not just left there as decoration. Condition 38 was a good compromise between skaters and developers. It protects both the history of the Woolstores and the 40 years of skateboarding that make the place what it is. Cutting out the main 1.6m section in front of the window would ruin the spot. That southern stretch is the longest, safest, and most used part of the ledge. Even Human Urban's own reports show how important it is. Losing it would destroy what makes Woolstores special. Condition 38 needs to stay. The Human Urban survey is not reliable as it was done only in cooler months when the space is less used. Skateboarding at Woolstores has been continuous for nearly 40 years and peaks in summer. After redevelopment, with skate-friendly tenants, use will only increase. Condition 38 was included to protect the skate ledge, ensure safety, and recognise its cultural significance. Removing it would increase conflict with pedestrians, damage Fremantle's heritage, and make Woolstores less active and attractive. The proposed number of entries along Cantonment Street is excessive and unsafe for skaters. Restoring heritage openings is supported, but not all should be functional doorways.

	Skateboarding is a vital part of Fremantle's identity and has been promoted as such by the city itself. The Heritage Council is considering formal recognition of the skate ledge, highlighting its importance. Human Urban's appeal ignores this cultural value, contradicts their earlier commitments, and undermines previous decisions of Council and the DAP. Condition 38 does not stop activation of the street. It supports safe coexistence between businesses and skateboarders while protecting Fremantle's cultural assets. Removing it risks empty retail spaces, a weaker community connection, and the loss of an internationally recognised skate spot. Woolstores is one of Fremantle's most iconic cultural sites. Condition 38 must remain.
55.	We will continue to skate the Woolstores Ledge from this day forth. **Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally** 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. Skateboarders from all around the world use this Ledge and will continue to skate and bringing tourism to Fremantle. 25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day.
56.	As someone who's part of the skateboarding community, I'm strongly against any attempt to change or remove Condition 38. While I acknowledge that a large portion of the ledge along the Cantonment Street side is set to remain, that alone isn't enough. Keeping Condition 38 in place is essential to ensure the space stays genuinely skateable. So far, Human Urban hasn't made any clear, long-term commitment to preserving the area as an active skate spot—they've only pointed out that around 85% of the ledge will stay. That's not enough. This ledge isn't just a physical feature—it's part of the cultural identity of the space, and it should continue to serve its original purpose, not be treated like a static display from the past.
57.	I am writing to express my strong objection to the developer's appeal of the development application decision for the Woolstores project. It is disingenuous that the developer is now challenging Condition 38, given their previous acknowledgments of the site's cultural significance to the skateboarding community. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. However, the Heritage Council of Western Australia is currently considering a place nomination to include the skateboarding ledge in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. This nomination underscores the importance of preserving the site's skateboarding heritage. Furthermore, the developer's appeal contradicts their earlier statements and actions regarding the significance of skateboarding at the site. In their Development Application, they acknowledged the importance of skateboarding to the site's cultural heritage, yet in their appeal, they are minimizing the contributions of the skateboarding community and its use of the ledge. This inconsistency highlights the developer's lack of genuine commitment to preserving the site's cultural significance. I urge the City of Fremantle to reject the developer's appeal and uphold Condition 38, which protects the skateboarding ledge and the community's interests. The City should prioritize preserving the site's cultural heritage and recognize the importance of skateboarding to Fremantle's identity. Thank you for considering my objection. I look forward to seeing the City of Fremantle protect the skateboarding community's interests and the cultural significance of the Woolstores site.
58.	The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to

	vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant.
59.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant.

	18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. 19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. 20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. 21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. 22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. 23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. 24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. 25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. 27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. 28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. 29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*,
60.	Hi there, my name is xxx, I am one of the many skateboarders that you see down at the ledge on the side of the elders wool stores building. I could not even try to guess the amount of hours I have spent at that place. It's where I go to relax, where I go to see my friends, and where I go to enjoy riding my skateboard more than any other place. This 'skate spot' is truely one of a kind and needs to be given the respect and acknowledgement it deserves. I just got back from a skate trip to Europe with some friends, we went to a bunch of the most famous skate spots in the world, and I can honestly

	say, nothing compares to what we have here in Fremantle. I hope you can see the importance in this and not accept HU's appeal. Thank you for your time
61.	I am writing as a long-standing member of the skateboarding community to express my opposition to the appeal seeking the removal of Condition 38 from the Elders Wool Store redevelopment approval. Condition 38 is a critical safeguard to ensure the ongoing skateability of the Cantonment Street ledge, which has been a recognised and celebrated skateboarding space for over 40 years. Removing this condition would irreparably harm Fremantle's cultural heritage, diminish community safety, and undermine the city's reputation as a cultural destination. 1. Cultural Heritage Value The Woolstores site embodies a dual heritage: its early 20th century wool industry history and its internationally recognised role as a skateboarding landmark. Condition 38 ensures this living cultural history is preserved, not reduced to a static façade. The 1.6m section of ledge proposed for removal is the most important and most skated part of the spot. Eliminating it would erase the heart of the community's contribution to Fremantle's cultural identity. 2. Community Safety & Functionality Condition 38 was introduced by Mayor Fitzhardinge to guarantee safe coexistence between skateboarders and pedestrians by limiting unnecessary openings along the Cantonment Street façade. The appeal would increase permeability to approximately 20% of the façade—equivalent to one doorway every 16 metres—creating unnecessary conflict and risk. Retaining Condition 38 balances activation of the space with safe use by the skateboarding community. 3. Tourism & International Significance The Woolstores ledge is internationally recognised, featured in global skate media and tourism promotion for Fremantle. Evidence from the West Australian Skateboarding Association and Sylvain Tognelli's mapping shows the southern portion of the ledge—directly affected by this appeal—is the most heavily used and culturally significant. Its removal would diminish Fremantle's reputation as a skateboarding and cultural destination, directly undermining future tourism opportunities. In conclusion, Condition 38 provides a balanced outcome: it preserves both industrial and cultural heritage, ensures safe activation of Cantonment Street, and protects Fremantle's international reputation. I strongly urge the Panel to reject the appeal and retain Condition 38 in full.
62.	Just writing in my thoughts and opinions on why the ledge should not be removed. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen.
63.	This email is to register my disagreement with the appeal to the planning application by urban human (the developer). The old wool stores and the skate spot that accompanies it holds a special place in our heart and is a cultural treasure. I have been using this space as a skate spot and as a cultural hub to meet friends for over 20 years. Since I was 10 years old. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. Thank you for reading my submission. Please listen to us and help protect this cultural icon.
64.	to whom it may concern, I'm emailing in relation to my thoughts and opposal of the removal of the skate ledge at **the 46-68 cantonment street woolstores** and that I'm strongly against the latest appeal. The skate ledge needs to be retained as much as possible, which doesn't seem to be the case with the latest appeal. There doesn't need to be as many openings or doorways as suggested in the plan. you can put these entrances / doors on Goldsborough Street, for example, and leave the skate ledge in its entirety. the skate community and also other members of the community have been outspoken in their thoughts towards this, in that, they have continuously requested the entrances/door ways be on another end or side/street of the Elders Woolstores that doesn't compromise the integrity and purpose of the skates ledge, but this seems to not have been acknowledged and also **misrepresented** in the press (see below): **On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by Fremantle Shipping News, The passage from the article:** *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*

	furthermore, Point 2 of the Conclusion is incorrect and misleading. It states: “The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA.” However, HU have not explained in their appeal how the condition supposedly contradicts heritage principles. On the contrary, the condition was introduced to preserve the site’s modern heritage, recognising the cultural significance of skateboarding in shaping the building’s history. Heritage is not limited to restoring a place to its original form—it is an evolving concept. In fact, the ledge and window/door in question have remained in their current form for more than 60 of the building’s 100 years, a point that was discussed extensively at the earlier JDAP meeting. The statement also wrongly implies that the City of Fremantle did not support the condition. In reality, the condition was put forward by Mayor Fitzhardinge and endorsed through a Council vote on 9 April 2025. the community would be deeply upset by the removal or changes to the ledge, please retain the ledge and ideally move the entrances / doorways to another side of the building that doesn't interfere with the ledge.
65.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950’s section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli’s mapping of the ledge’s use by skateboarders (referenced in HU’s Landscape Design Report) as well as Human Urban’s survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association’s Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the “ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies.” Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and ‘street culture’ is an important part of Fremantle’s history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don’t lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they’ve previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can’t take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural

	custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. 18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. 19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. 20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. 21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. 22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. 23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. 24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. 25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. 27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. 28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders.

	29. Point 2 of the Conclusion is factually incorrect and misleading. ”The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA.” HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building’s 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*,
66.	I am writing to you regarding the appeal made by Human-Urban regarding Condition 38. I would like to make it abundantly clear that I DO NOT support the appeal or the removal of this clause. Firstly, I would like to note that Human Urban have continued to state that 85 per cent of the ledge will be retained for the skateboarding community; however, by appealing this clause, they are failing to recognise the importance of the retention of functional skating space, with cultural heritage. We have not asked for it to be retained as a museum piece. Further, drawing on Sylvain Tognelli’s mapping of the ledge’s use by skateboarders (referenced in HU’s Landscape Design Report) as well as Human Urban’s survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association’s Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. Additionally, I would like to refer to the revival of the Treasury Building in Perth CBD. With multiple commercial spaces on the ground floor (much like HU's plan for the Woolstores), there is only one entry into a shared central walkway through the middle of the building, rather than individual openings for each retailer. The Treasury Building has been a major success for the community and the retailers, whilst simultaneously retaining all heritage elements on the outside of the building (by not allowing more openings). I think it is important to consider, once more, the cultural heritage of the Woolstores Ledge in terms of skating, and to give the building and the skate community the same level of respect that was given in regard to the Treasury Building. I'm proud to be a part of the Fremantle community because of its appreciation and acceptance of all people, no matter their background. It's a place where quirks shine, and people are encouraged to get out into the streets and share the space with one another. HU's appeal of Condition 38 puts this all at risk, by isolating the skating community (a big part of Fremantle), and destroying one of Fremantle's main points of cultural heritage *and* international reputation. This world-famous skate ledge has been a part of Fremantle's cultural heritage for almost 40 years, don't let it die out.
67.	I strongly object to Human Urban’s appeal to remove Condition 38. Condition 38 was carefully included to support a balanced outcome: one that preserves heritage, ensures safe activation, and protects Fremantle’s reputation as a cultural destination. Removing it risks undermining those goals. First, Condition 38 enhances *activation and retail success*. Skateboarding at the Woolstores draws consistent daily visitors and creates activity in quieter afternoon periods, which is precisely when local businesses most need foot traffic. If the ledge is compromised, the precinct will lose a key source of organic activation, making it harder to attract and retain suitable tenants. Second, the condition reduces *safety and liability risks*. Allowing additional roller-door entries directly where the most skated ledge sits creates predictable conflicts between pedestrians and skateboarders. This increases the likelihood of accidents and exposes both tenants and the developer to avoidable risks. Retaining Condition 38 ensures the space functions more safely for all users. Finally, Fremantle’s cultural reputation depends on protecting this unique asset. The Woolstores are internationally known in the skateboarding community and have even been used in tourism marketing. Removing the most significant section of the ledge risks negative national and international attention, damaging Fremantle’s image as a place that values its cultural identity. For these reasons, I respectfully urge you to reject the appeal and maintain Condition 38.
68.	Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950’s section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. Do not remove this spot. It's a cultural landmark. Thanks.
69.	• As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate

	spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. • I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. • Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. • Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. • The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. • Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. • The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. • I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. • The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. • Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. • The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. • The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. • The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? • Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. • THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. • The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application.

	• HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. • This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. • Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. • The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. • HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. • Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. • The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. • It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. • The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. • The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. • The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU.

	• Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. • Point 2 of the Conclusion is factually incorrect and misleading. ”The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA.” HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building’s 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*,
70.	This email is regarding the removal of condition 38 at the Woolstores. As a member of the Fremantle community and home owner, I do not support the removal of condition 38. The survey presented by Human Urban lacks credibility — it was conducted only during May and June, a quieter period for skateboarding due to cooler, wetter weather. To be accurate, a survey would need to run across all seasons, as ledge use peaks in summer and is expected to grow further once redevelopment attracts skateboarding-friendly tenants. Condition 38 was introduced to ensure the ongoing skateability of the ledge, recognising its cultural significance and reducing potential conflict between skaters and pedestrians. Removing it would increase collisions, strip the space of its cultural value, and undermine activation of the Cantonment Street precinct. For nearly 40 years, the Woolstores ledge has been an iconic skateboarding landmark, known internationally and deeply tied to Fremantle’s cultural identity. Fremantle markets itself as a cultural destination, and losing this space would erode its cultural capital, especially as similar street-culture spaces have already been lost. The appeal lodged by Human Urban is contradictory, ignores community concerns, and recycles previously rejected arguments without new evidence. This raises serious doubts about their capacity to deliver a development that respects Fremantle’s culture and community. Ultimately, overturning Condition 38 would make the Woolstores harder and less enjoyable to skate, diminishing its value to skaters and the broader community. It would destroy a vital cultural asset that has shaped Fremantle’s identity for decades.
71.	Fremantle’s cultural heritage is defined by its rich and layered history — from the port and the wool industry to the enduring presence of skateboarders at Woolstores. These elements are not isolated relics of the past, but living traditions that continue to shape the city’s unique identity. The successful appeal of Condition 38 would place this heritage at significant risk, eroding one of Fremantle’s most important cultural sites. For decades, the skateboarding community has been the most consistent and active stakeholder at Woolstores. Skateboarding and street culture form a critical part of Fremantle’s cultural fabric, representing creativity, youth expression, and a sense of place that has become increasingly rare in contemporary urban environments. In recent years, many such spaces have already been lost, and the removal of Woolstores as a cultural hub would mark a further and irreparable erosion of Fremantle’s social and cultural capital. Preserving this site is not solely about protecting skateboarding. It is about recognising and safeguarding a living heritage that reflects Fremantle’s character, resilience, and community spirit. The loss of Woolstores would represent not only a failure to protect a key aspect of Fremantle’s identity, but also a missed opportunity to honour and maintain a cultural legacy that continues to enrich the city.
72.	I have been following the advancements in the project for the development of the Fremantle Woolworth Stores from overseas. I now understand that large sections of the ledges along the Cantonment Street facade of the building are being retained. However, critically, more still needs to be done to ensure the ledges and the space surrounding remains skateboard friendly and functional. Condition 38 remaining in place will have a considerable positive impact on the efforts and need to both secure and protect the future of a skate spot that has a rich skate heritage both locally and globally. Personally, I had been familiar with these ledges from their inclusion in significant and myriad skateboarding media. These ledges have reached far and wide. Myself in the UK, as a boy, had been introduced to this unique spot through these images and video parts. Naturally, I relished the experience, during my overseas studies at the University of Murdoch, to finally skate these very ledges. The friends and skate memories directly made with these ledges are precious and I would be remiss not to mention their value both culturally in Freo; but also the value they hold on a global skate stage and importance to the wider skate community. Their reach and influence is not to be undersold. It would be a sad day to know, that through development plans unchecked and uninformed, others, younger generations, could well be denied these skate experiences, which for myself and many others hold so dear. For future generations of skaters; and as a past member of the local Fremantle skateboarding community I DO NOT support the appeal or removal of Condition 38. Human Urban must understand that the space should continue operating as a skate spot - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not just an aesthetic piece. Thank you for reading and consideration,

73.	As a woman in her 80s and a long-time resident of Cockburn, I write to strongly object to Human Urban's appeal to remove Condition 38 from the Elders Wool Stores Development Application. This condition was thoughtfully introduced by Mayor Fitzhardinge and supported by Council to protect both the building's architectural heritage and the vital cultural and social role that the ledge on Cantonment Street has played for nearly 40 years. Fremantle is rich not only in history but in community spirit, and the long ledge along Cantonment Street has played a significant part in that. While I'm not part of the youth who actively use the space, I've often paused to admire the energy, creativity, and camaraderie that fills that street. Their use of the ledge is not just a pastime — it is a form of engagement, expression, and connection spanning generations. I have often stopped to watch them, smiling at their focus, creativity, and kindness. They've always been courteous and welcoming — a refreshing and positive presence in our public space. The presence of skateboarders has always made me feel safe, uplifted, and connected to the spirit of Fremantle. Their consistent use of the space provides passive surveillance and keeps the area alive — something that sterile retail tenancies alone cannot replicate. The appeal's suggestion to remove the most critical 1.6 metres of uninterrupted ledge for a new retail entrance is not a minor change. This section is the most used, most significant part of the site's cultural life, and its removal would effectively destroy the function and value of the space as a gathering place for youth and a piece of living heritage. Human Urban's appeal fails to introduce any meaningful new evidence and directly contradicts statements made in their own Development Application. Their limited site usage survey, conducted in cooler months, does not reflect the year-round importance of the space. Furthermore, the claim that Condition 38 limits street activation is misleading — skateboarders have long been the primary activators of this space, providing vibrancy, safety, and international cultural value. Condition 38 strikes a fair balance between heritage protection and future development. Removing it would go against the informed decisions of both Fremantle Council and the Inner Metro Development Assessment Panel, and undermine community trust in the planning process. As someone who has seen Fremantle grow and change, I urge you to retain what truly makes it special. Please reject this appeal and uphold Condition 38 — not just for today's youth, but for the continued richness of our shared cultural landscape.
74.	I strongly advocate that Condition 38 should remain as is and not be appealed. Here are a few points as to why: Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately remove the part of the ledge used for skateboarding. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it.

	When I was young (aged 10 - 15) my mum would often take us to Clancy's fish pub across from wool stores to see live music or to Old Shanghai for dinner in the summer evenings on a Friday or Sunday - The ledge and Woolies as a place, meant a lot to me back then and helped me in a lot of ways processing some traumatic events I had experienced at the time, being able to just forget for a moment on what was going on and just skate with people I both looked up to and others I'm lucky enough to call life long friends. I'm sure there are a lot of fond memories like this you're currently receiving and there will be long into the future if community groups like the western australian skateboarding association continue safeguarding culturally significant places like the Woolies ledge in the community, not only for skateboarding but for Fremantle as a whole as well.
75.	I am writing to strongly oppose the appeal to remove Condition 38 at the Elders Woolstores site. The 1.6m ledge in front of the window is the most skated and culturally significant part of the site. Its removal would irreparably damage the functionality of this world-famous skate spot, which has been part of Fremantle's skateboarding culture and heritage for nearly 40 years. Condition 38 represents a balanced heritage outcome, preserving both the Wool History of the building and the unique cultural heritage of the skateboarding community. Retaining the condition ensures the site remains a living, active part of Fremantle's streetscape, rather than a static museum piece. The skateboarding community has long been a key stakeholder in maintaining the activation and vibrancy of Cantonment Street. Removing Condition 38 would increase pedestrian conflicts and reduce the safety and life of the precinct, undermining both social and cultural benefits for Fremantle. As a cultural practitioner and leader in Western Australia's music and arts communities, I have been asked many times to be part of various site "activations" that are both costly and ineffective. These experiences have highlighted to me that cultural heritage and value such as what is seen at Wool Stores currently, cannot be manufactured or replaced once lost. The cultural heritage that has already existed here for 40 years is worth protecting, even for this reason alone. Preserving and celebrating this legacy is not just about maintaining a record of the past—it is about valuing and guaranteeing the ongoing, lived cultural experience that continues to enrich the community and provide a foundation for meaningful, sustainable engagement and activation both on Cantonment Street and throughout Fremantle. I urge the relevant authorities to ensure Condition 38 is retained in full.
76.	My name is xxx, I am a Senior project Manager working as a Public Servant, leading State Government capital works projects across disciplines and regions for almost 10 years. I have a background in architecture, as well as being a life long skateboarder who was born and raised in Fremantle. Over the past two years I have put my professional experience, personal time and energy towards a cause and community that I feel incredibly grateful to be part of - the West Australian skateboarding community and the skateboarders who have called Woolstores home for almost 40 years. I support the Human Urban development of the Wool Stores building however, I staunchly oppose the appeal listed in the subject line, submitted by Urbis on behalf of their client Human Urban. I believe this appeal has no grounds for serious consideration. It should only be looked at as a matter of correct planning process, however, to save everyone spending any more time on a matter that has already been resolved, I would like to see the appeal swiftly rejected. No new information has been submitted and this appeal is no more than a waste of time and money - for the panel, the community, the tax payers and anyone else being forced to consider this poorly constructed example of an appeal. The quality of the appeal is greatly lacking, with statistics and information that has been presented, being incorrect - Urbis should double check their numbers next time, or perhaps they are intentionally misleading the panel. I would suggest that if Human Urban and their incredibly qualified team had only put their time and effort towards resolving the conditions set in their approved DA, they would have been able to find an incredible solution that would have benefited them and the final outcomes of the development. Instead they have chosen to dedicate their time towards fighting a planning decision that listened to, appropriately considered and approved the requests of both the City of Fremantle and the West Australian Skateboarding Association - requests that would see the cultural heritage of skateboarding at Woolstores preserved and protected for future generations. The community of skateboarders at Woolstores have contributed immeasurable and invaluable cultural capital to the Wool Stores building and the City of Fremantle over the last 40 years. Recognised internationally, Woolstores has brought skaters from all over the world to the port town of Fremantle, to experience this incredibly important place we have. An approximately 100m of uninterrupted ledge is almost unheard of globally. This is the reason skaters have flocked to Perth for so many years. Without Woolstores, international professionals, teams and brands would have no reason to come to Perth, and with Skateboarding globally reaching a public platform never before seen, the loss of this asset for the local community of young skateboarders in particular would be unbelievably unfortunate. Human Urban continues to repeat themselves about the 85% of ledge being retained. However, the volume of ledge is less important in this argument than the sections of ledge that are at risk of being lost, or rendered unskateable if this appeal is successful. The last 40 years of video and photo evidence clearly identifies the southern half of the building being of key significance. This is not simply due to preference or choice. The reason this half of the building is more commonly skated is due to the fact that the Northern half of the building - the new longest section, as stated in the appeal, has window sills and other protrusions from the facade that the 1920's southern portion does not have. These protrusions are a safety hazard when grinding on top of the ledge. This is why restrictions of functional openings through the southern portion of the facade, as set out by Condition 38, is so critical to the ongoing use of the woolstores ledge. In addition, the window/door that has been so deeply explained and debated is the most iconic section of the ledges skateboarding identity and cultural heritage. It is our logo, our proving ground, this section of ledge is the longest skated portion and has become culturally significant in not only its function as a skateboarding obstacle but also the international identify of the spot. To give you an extreme example, countless people all over Australia have this window tattooed on their skin. Human Urban and Griffiths have argued that the return of windows and doorways to their original form respects the heritage value of the building. This argument is false and satisfies only their commercial needs rather than respecting the true heritage of the building. Heritage is a living and ever evolving thing, it does not simply mean the return of everything to that which what once was. The window/door reached its current form sometime in the 1960's, with the ledge being constructed in front of it at this time, meaning that for almost 60% (or 60 years) of the buildings life it has

	been in its current form as a window. Not only statistically has it been a window longer than it was ever a door, but I would suggest that most people in Fremantle, as well as those coming from other suburbs, would recognise this part of the building as always having been a window - you would struggle to find someone who remembers this door ever existing. It is for these reasons that I dispute the fact that based on heritage value, this window should be returned to its former function as a door. The portion of ledge in front of this window should remain in place and the window should remain a window. This is the appropriate heritage treatment for this portion of the facade. Griffiths in all of their heritage assessment work over the past 15+ years on this building have failed to ever recognise skateboarding as culturally significant, something that the Heritage Council of WA have done in their reconsideration of the existing heritage listing. This clearly shows the amount of interest Griffiths has for any social or cultural heritage associated with this building since its heritage listing in the early 2000's, as well as post its use as a functioning wool store. Skateboarding has shaped the modern heritage of this building over the past 40 years, making up almost half of the buildings life. Woolstores has existed as a skate spot for almost the same amount of time that the building stored and processed wool. Human Urban also refer to a survey conducted during Winter that provides evidence of the limited use of the space by skateboarders. Without seeing any proof or additional info associated with this survey, I would argue that this survey is redundant. A survey of this nature should not only be provided up front and in full to the panel, but it should be conducted over the course of at least one calendar year to fully understand the scope of activity occurring at the space. Over the winter months the use of the space is less frequent as skateboarding is not an activity that can occur when the ground or ledge is wet. I would also suggest that if surveyed appropriately, Human Urban would find that skateboarding at Woolstores typically occurs in the mid to late afternoon, a time of day where retail and food and beverage operations tend to slow down. With this information in mind, I would argue that if embraced and supported in its current form, skateboarding could appropriately add to the day time use of the space, guaranteeing life on the street, activation and passive security - something that we all want to see come out of this development. In terms of streetscape activation, the options in this area of Fremantle are limited, if not rapidly being lost. In the Development Application and through the local and state planning decision meetings, Human Urban repeatedly touted Circus WA as a key community stakeholder and an opportunity for activation in the precinct. Since the Development was approved in April, Circus WA have announced their relocation to an alternative location, elsewhere in Fremantle, purchased in part by Adrian Fini. This leaves the precinct with even less guaranteed street level activation and provides even greater reliance and opportunity on the skateboarding community at Woolstores that already exists and manages the space. Without a guarantee of streetscape activation, the development and the City of Fremantle risks another failed development, creating yet another baron wind tunnel with little interest or reason to visit. Human Urban will argue that they plan on activating the space through their tenancies however, this cannot be guaranteed, especially when it comes to Cantonment Street. Skateboarders are here and we want to remain. We want to see this development succeed, we want to see Fremantle thriving and we want to continue actively participating at Woolstores, with the ledge in its current form. The successful appeal of Condition 38 risks this. Without Condition 38, the future functional use of the space will be compromised and the Development and the City of Fremantle risks losing yet another piece of its cultural heritage identity, as well as a healthy and naturally occurring life on our streets. I strongly believe that Condition 38 should be supported, for the third time, and that this appeal be unanimously rejected. There has been no additional work or evidence provided by Human Urban (or Urbis and Griffiths) to justify this appeal, it is simply a Developer having another go and refusing to accept a decision that was in support of a genuine and dedicated community group. I urge you to please participate in rejecting this appeal and changing the story when it comes to Developers leading the Western Australian planning process. Thank you for your time and consideration of the points raised.
77.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is

	redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the “ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies.” Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and ‘street culture’ is an important part of Fremantle’s history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don’t lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 11. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 11. The Appeal submitted by Human Urban is full of contradictions involving comments they’ve previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can’t take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 14. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 14. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU’s minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. 18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU’s own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. 19. Condition 38 does not affect HU’s ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. 20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. 21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. 22. Griffith’s Architects’ December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith’s Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the “The Cantonment Street Awning and Plinth” has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the “Skateboard Ledge” on Cantonment Street is currently under

	consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice. 23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. 24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. 25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. 27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. 28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. 29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. 30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*
78.	As frequenter of Fremantle, and the mother of two members of the Fremantle Skateboarding Community **I DO NOT support the appeal or removal of Condition 38** by Human Urban. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I urge the city to seek a broader perspective as this appeal only reflects the views of a property developer, and not of the broader Fremantle community, Fremantle Council or DAP. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on

9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant, and a complete waste of time and money for all parties involved.

Their previous words contradict their current appeal. Prior to the previous DAP meeting, as stated by Human Urban to the DAP, an offer was made to compromise and settle for one doorway to remain open. This appeal does not mention that adequately enough and fails to show that at that HU were willing to find a compromise between both parties and work with the constraint of having one door closed and the 1.6m of ledge not being cut underneath the window.

The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, little to no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time.

The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight?

The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhardinge and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. We have consistently used it over that entire time. The continued use of this place is important to its social and cultural heritage, HU's appeal puts the last 40 years of skateboarding use and heritage in jeopardy from ceasing to exist.

On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from my son on behalf of the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article:

> *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*

Heritage

I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct.

When following the Burra Charter guideline for planning a heritage space, There is a lot of scope for the social and cultural history of the West Australian Skateboarding Community to be taken into account when applying the Burra Charter guidelines for planning a heritage space to the Woolstores Building. I do not believe that this was done adequately when Human Urban were creating their Development Application for the site. The Burra Charter Process begins with "Understanding Significance", we believe that the Skateboarding Space on the Cantonment Street Facade of the Elders Wool Store is not adequately understood by the developer and has not been appropriately taken into consideration in the future development of the building. The appeal of Condition 38 actively damages the skateboarding community and the future of youth in Fremantle.

The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. This can be found here: https://inherit.dplh.wa.gov.au/Public/Inventory/Details/92e60759-46d6-4406-89ee-f4453b381dfe?preview=true

Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space.The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice.

An Interpretation Plan for the Elders Wool Store that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent use of the place by the Western Australian and international skateboarding community is to be provided to the satisfaction of the Director, Historic Heritage Conservation prior to the application of a building permit. For this to be included in HCWA's advice on the development so incredibly soon after Griffith's Heritage Assessment brings into question the validity of the assessment and highlights the importance of the retention of as much of the ledge as possible whilst HCWA is making their determination on amending the heritage listing.

	Even though HU says the ledge is allegedly used by an average amount of 3 skateboarders per day throughout the month of May, this proves that even in the Wool Store's state of disrepair that the skateboarding community has consistently used and developed a unique social and cultural link to the site over the last nearly 40 years. Article 7.1 of the Burra Charter states that "Where the use of a place is of cultural significance it should be retained". We have been consistently using the sight since the late 1980s without breaks. When the building is restored to its former glory, the number of skateboarders using the site will increase, especially if HU is focusing on skateboarder friendly tenancies which will draw more skateboarders to the site. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal. In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition - the condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. ***Skateboarding*** HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion for skateboarders. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, normally a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to

	4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. ***Activation*** Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. Their previous developments contradict this point being made. HU (formerly known as Hesperia) has previously developed the State Building on St George's Terrace. The State Building shows that Hesperia has the capability to develop and restore a heritage building using large single openings leading towards interior Food and Beverage retailers. These Food and Beverage retailers have windows viewing out onto the street, whilst having no direct street doorways. The small independent retailers on the St George's Terrace side of the building are actually located in either the basement or half basements, and have to be accessed via stairs leading down from ground level. This development has been widely deemed a success, there is no reason why this model cannot work in Fremantle. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. I disagree with pages 8, 9 and 10 of their appeal. HU is using City of Fremantle's draft plan to minimise and eventually eliminate a community to suit their development. This is something that the City of Fremantle would not do, and actively contradicts the council decision made on April 9th 2025.
79.	Hope this email finds you well. Please prevent Human Urban from successfully appealing condition 38. Woolstores is a vital cultural iconic skate location of Fremantle. It provides a sense of community, belonging and the healthy activity of skating. If Woolstores is not preserved, crime will rise as the world renowned skate destination is destroyed. Fremantle prides itself on its vibrant culture with all walks of life, emphasising inclusivity and diversity. Please ensure Woolstores remains a place where people can all enjoy skating together. I personally value authenticity and hope Fremantle stays strong on its original agreement. Please do not overturn Condition 38. Please be advised on the below: 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct.
80.	As a member of the Fremantle Skateboarding Community **I DO NOT support the appeal or removal of Condition 38** by Human Urban. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I urge the city to seek a broader perspective as this

appeal only reflects the views of a property developer, and not of the broader Fremantle community, Fremantle Council or DAP.

HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant, and a complete waste of time and money for all parties involved.

Their previous words contradict their current appeal. Prior to the previous DAP meeting, as stated by Human Urban to the DAP, an offer was made to compromise and settle for one doorway to remain open. This appeal does not mention that adequately enough and fails to show that at that HU were willing to find a compromise between both parties and work with the constraint of having one door closed and the 1.6m of ledge not being cut underneath the window.

The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, little to no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time.

The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight?

The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. We have consistently used it over that entire time. The continued use of this place is important to its social and cultural heritage, HU's appeal puts the last 40 years of skateboarding use and heritage in jeopardy from ceasing to exist.

On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from myself on behalf of the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article:

> *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*

Heritage

I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct.

When following the Burra Charter guideline for planning a heritage space, There is a lot of scope for the social and cultural history of the West Australian Skateboarding Community to be taken into account when applying the Burra Charter guidelines for planning a heritage space to the Woolstores Building. I do not believe that this was done adequately when Human Urban were creating their Development Application for the site. The Burra Charter Process begins with "Understanding Significance", we believe that the Skateboarding Space on the Cantonment Street Facade of the Elders Wool Store is not adequately understood by the developer and has not been appropriately taken into consideration in the future development of the building. The appeal of Condition 38 actively damages the skateboarding community and the future of youth in Fremantle.

The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. This can be found here: https://inherit.dplh.wa.gov.au/Public/Inventory/Details/92e60759-46d6-4406-89ee-f4453b381dfe?preview=true

Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space.The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice.

An Interpretation Plan for the Elders Wool Store that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent

	use of the place by the Western Australian and international skateboarding community is to be provided to the satisfaction of the Director, Historic Heritage Conservation prior to the application of a building permit. For this to be included in HCWA's advice on the development so incredibly soon after Griffith's Heritage Assessment brings into question the validity of the assessment and highlights the importance of the retention of as much of the ledge as possible whilst HCWA is making their determination on amending the heritage listing. Even though HU says the ledge is allegedly used by an average amount of 3 skateboarders per day throughout the month of May, this proves that even in the Wool Store's state of disrepair that the skateboarding community has consistently used and developed a unique social and cultural link to the site over the last nearly 40 years. Article 7.1 of the Burra Charter states that "Where the use of a place is of cultural significance it should be retained". We have been consistently using the sight since the late 1980s without breaks. When the building is restored to its former glory, the number of skateboarders using the site will increase, especially if HU is focusing on skateboarder friendly tenancies which will draw more skateboarders to the site. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal. In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition - the condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. ***Skateboarding*** HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion for skateboarders. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, normally a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning

	application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. ***Activation*** Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. Their previous developments contradict this point being made. HU (formerly known as Hesperia) has previously developed the State Building on St George's Terrace. The State Building shows that Hesperia has the capability to develop and restore a heritage building using large single openings leading towards interior Food and Beverage retailers. These Food and Beverage retailers have windows viewing out onto the street, whilst having no direct street doorways. The small independent retailers on the St George's Terrace side of the building are actually located in either the basement or half basements, and have to be accessed via stairs leading down from ground level. This development has been widely deemed a success, there is no reason why this model cannot work in Fremantle. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. I disagree with pages 8, 9 and 10 of their appeal. HU is using City of Fremantle's draft plan to minimise and eventually eliminate a community to suit their development. This is something that the City of Fremantle would not do, and actively contradicts the council decision made on April 9th 2025.
81.	This email is to express the fact that I do not support H-U 's (the developer) intent to appeal the decision for approval of the Woolstores building development subject to the inclusion of Condition 38 as part of the development that will retain the Cantonment St frontage and retain it for skateboarding. Further to this I am in full support of the decision the Fremantle Council and in particular Mayor Fitzhardinge voted for on 09/04/2025 The significance of this building to skateboard culture can not be disrupted both on a local and international stage and this had been demonstrated in multiple occasions, for the developer to make changes to this area would essentially destroy the spot, this was a sentiment echoed by the chair of the MIDAP panel. Both the Fremantle council and MIDAP panel voted to retain Condition 38 in acknowledgment of the significance cultural impact skateboarding has in relation to the Woolstores building. If this appeal is unsuccessful how many more times will the developer appeal?? Will it go on until they get the answer they want?? All the while the building continues to deteriorate..... It is also worth noting that skateboarders at Woolstores have been a focal point of the " This is Fremantle " campaign as a draw card to highlight the vibrant skate community that Fremantle has fostered and continues to develop and the unique culture that Fremantle has.

	It seems now that our connection to the building is being discounted and the developer is happy to use our culture for their street cred but in reality would prefer us out of site out of mind, to me that doesn't seem incredibly fair. As stated previously we are not against the development however we are against any appeal that will jeopardize the long term future of Woolstores as a place of significance to the skateboarding community. We are simply asking for our culture and history with the building to be recognised and Condition 38 we feel strikes a perfect balance.
82.	Fremantle is a long way from Gosnells on public transport but my friends and I did it nearly every weekend to skate the fabled Woolstores or more commonly known as “woolies”. I was a teenager then and now 20 years later I still make my way Woolstores when I get a chance, my joints may be sore and my body tired but I still get the same thrill and feeling of belonging and community that I felt as a young man. I feel condition 38 was received well, even celebrated by the people of Fremantle and the wider Perth community. Fremantle is known for skateboarding, Woolstores and its skateboarders have been used to advertise Fremantle to the world! So it was with immense disappointment to learn that condition 38 may be removed. This cannot be allowed to happen. Skateboarding is a part of Fremantles soul and has been for 40 years, if the removal of article 38 is allowed, it will ruin Woolstores. Then the skateboarders, a staple of the street culture Fremantle prides itself on, will leave and so will a part of Fremantles soul.
83.	I have never been to Australia but if I did id visit Freemantle and skate these ledges. They are legendary. I don't know how many skste videos I've watched featuring these ledges. And now I understand they are to be made unskatable by Human Urban's appeal of Condition 38. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece.
84.	My name is xxx, I’m a 26 year old female and I currently live on Cantonment street in the Woodson’s apartments with xx. On behalf of him and myself, I would like to email to show I do not support the appeal or removal of Condition 38. I’ve been apart of the Fremantle community my entire life and I think it is deeply important that more is done to ensure the ledge and the space surrounding remains skateable by Condition 38. Fremantle shouldn’t lose any more of its character or culture, it’s what brings so many of us people together, even the ones who don’t and have never been apart of the skateboard community specifically, like my Dad and myself and we’ve seen what it does to connect and unite people. I’ve met and watched so many amazing people through mutual friends in the Fremantle community that this means so much to, and I watched it first-hand shape them into the people that they are today. Many of them working in Fremantle now and contributing to the social and communal integrity of Fremantle. I think protecting this could serve Fremantle in so many ways for so many more generations to come.
85.	I am writing to express my concern regarding the proposed application amendment for the removal of condition 38 regarding the Elders Woolstores. ‘ I DO NOT support the appeal or removal of Condition 38. I understand that the heritage door in question (including the 1.6metre portion of ledge) should remain inactive, to ensure the safety of both F+B/retail patrons, building tenants as well as skateboarders. This significant portion of ledge must be retained in its entirety for it to remain functional as a safe and iconic skate spot. Removing this small yet incredibly important section of ledge will damage the spot, reducing its significance locally and internationally. The impact that the proposed 1.6metre portion will have on this space, shouldn’t be minimised or underestimated. I understand that Condition 38 provides a fair heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years, while coinciding with the new development. Condition 38 should remain and not be removed.
86.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950’s section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli’s mapping of the ledge’s use by skateboarders (referenced in HU’s Landscape Design Report) as well as Human Urban’s survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association’s Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle.

	5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application. 17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant. 18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel. 19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation. 20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time. 21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it. 22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice.

	23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development. 24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle. 25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38. 26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day. 27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU. 28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders. 29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. 30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*
87.	I have grown up in Fremantle my whole life and am currently living and working in Fremantle. I have read H-U's appeal and it is full of contradictions and incorrect observations. I fully support condition 38 and believe DAP's decision should be firmly upheld for the following reasons • H-U's appeal brings very little new information compared to their case at the original DAP meeting • Their survey of skate usage was done in the winter months, reporting 0 users on 23% of days, however it rained on far more than 23% of days, and a significant amount of skaters leave Perth for the winter. They reported an average of 90 minutes use per day and claimed this equates to activation of the area for less than 10% of trading hours. For this to be true trading hours would have to be over 15 hours per day. At an 8hr trading day that would equate to 19% of trading hours. They have also miscalculated the % of ledge being removed. If you refer to their diagram they neglect to highlight the 15m of ledge being removed on the northern end of the facade. • 4 functional entrances on the facade enough for retail and tenants to access the building. • The two areas in question are the most historic and iconic parts of the ledge. With doorways in these areas the flow will not work, pedestrians may be at risk and skateboarders will no longer be able to use the space. International professionals will not longer travel to Fremantle fo the ledge. It is the last remaining piece of skateboarding culture in Perth and condition 38 destroys it. • The entire ledge is listed on HCWA awaiting heritage assessment, this will likely breach their assessment if it were able to be done in time.

	• H-U themselves claim to recognise the cultural importance of the ledge, if this is true they should not ruin it with this condition. • Their claim of retaining 85% is true but these small doorways are absolutely crucial to the function. The % does not matter. Its like having a haircut where you ask for 2 inches taken off, and they cut off two inches of hair from only one side and claim they gave you what you asked for. Please do not let this cultural landmark be ruined.
88.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the

skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application.

17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant.
18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel.
19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation.
20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time.
21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it.
22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice.
23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development.
24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle.
25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38.
26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day.
27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU.
28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders.
29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door

	in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025. 30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*
89.	As someone who's part of the skateboard community, I don't support the appeal or removal of condition 38. I get that most of the ledge along the cantonment street side of the building is staying, but that's not enough. Condition 38 needs to stay in place to make sure the ledge and space around it can actually be skated. So far, human urban hasn't properly committed to keeping this spot skateable. They've just said that 85% of the ledge will still be there. That's not the same as keeping alive as a real skate spot . It should stay as something people actually use, not just something to look at.
90.	Hi planning team, As a member of the skateboarding community & someone who has spent 30+ years skateboarding & documenting the culture that has thrived here, I DO NOT support the appeal or removal of condition 38 which has been set in place to preserve & retain this cultural history. The removal of this clause will effectively close the door on skateboarding & not uphold the criteria of preserving Fremantle's cultural heritage. Human Urban has clearly revealed it's actual intention is not to retain the heritage & culture, but to maximise the leasing capability of the proposed project in order to obtain the greatest ROI, whilst also referring to skateboarding as an intrusive addition & complication for them to achieve their goals. Condition 38 provides a balanced heritage outcome & should not be removed.
91.	I am writing to you today as a community member to urge you not to remove Condition 38. Condition 38 is essential because it protects both the historic wool industry heritage of the Elders Wool Store and the unique cultural heritage created by the skateboarding community over the past 40 years. While Human Urban (HU) claims that 85% of the ledge will be retained, they have not committed to preserving it as a living, functional space. The ledge is not a static architectural feature, it is a globally recognised skateboarding landmark that has contributed significantly to Fremantle's cultural identity. The portion of the ledge under threat (the 1.6 metres in front of the window) is the longest uninterrupted section and the most heavily skated area, precisely because it is free of obstructions and safe to use. Cutting this section will ruin the site's functionality and destroy decades of cultural history documented by local, national, and international skateboarding communities. Evidence from Sylvain Tognelli's mapping, HU's own survey footage, and the West Australian Skateboarding Association's video history timeline all confirm that this southern portion is the heart of the site's skateboarding significance. The removal of this small but vital section will not only diminish its international reputation as a destination but also reduce Fremantle's appeal as a cultural city and tourist hub. **The appeal to remove Condition 38 is a cynical attempt to bulldoze through cultural preservation and undermines the history and ongoing functionality of the site. It's a keystone that MUST remain, despite the best effort PR spin from URBIS.** Mayor Fitzhardinge introduced the condition specifically to ensure ongoing safe use of the space, minimising pedestrian–skater conflict while preserving cultural value. HU's appeal dismisses the will of the Fremantle Council, the Development Assessment Panel, and the broader community, offering no new evidence but instead contradicting their earlier commitments. By retaining Condition 38, Fremantle safeguards its cultural capital, ensures long-term activation of Cantonment Street, and supports the only stakeholder group with a proven 40-year history of bringing life, identity, and international recognition to the Woolstores site. Removing it would not only undermine heritage but risk killing one of Fremantle's great cultural assets. I will be watching the outcome of this appeal closely,
92.	As a skateboarder, artist, community support worker, disability health worker, youth mental health worker and active member of Fremantle - I 1. Do not support the appeal or removal of condition 38. The ledge needs to be maintained as an active skateable part of woolstores given its significance to history. We don't want to see Fremantle demolished and the heart taken away from Fremantle. We can look to Melbourne as a good example to follow - for one of their city's missions is to 'have a skateable city' - to promote skating and non - car modes of transport. The ledge isn't just pretty or an artifsct - it is a significant part of Fremantles history that is well worth maintaining as an active, skateable part of Fremantle.

	2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. If you put a door in the middle of the ledge it will obviously not be safe for patrons and the whole point of saving the ledge will be redundant because modern skaters are respectful and do care about their pedestrian counterparts. It will be awkward for both skaters and pedestrians to balance and probably the skaters will get heckled at by pedestrians even though we are kind considerate people who really care about community. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 7. minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. Long story short - your survey is not fair and obviously swayed by personal bias. And you should not go ahead. Look at freo's 10 year plan and see what aligns with that. It is very serious that you retain woolstores ledge. Fremantle is a vibrant place with significant art and culture. And it should remain that way. Check yourself. Money hungry Wiesel's. Get your values straight.
93.	I have read the submissions regarding Condition 38 of the above planning approval in full and wish to comment as follows: As a local resident and someone with a particular interest in the development of the east end of Fremantle, I absolutely endorse the removal of Condition 38 which would have a disproportionately negative impact on the proposed Woolstores Development from so many perspectives: - heritage, commercial, investor and pedestrian to name four. The fact that the skateboarding ledge has been largely preserved in the proposed development is an outstanding result – clearly to the satisfaction of the skateboarder body consulted. I find it to be extremely short-sighted that the Council and DAP should demand re-design of key elements that will compromise the heritage values, the commercial viability and usability of this much-needed, high-quality development by taking a "purist" approach to skateboarding. Please remove Condition 38 and let this project proceed.
94.	As a member of the skateboarding community, I strongly oppose the appeal or removal of Condition 38. While I understand that Human Urban intend to retain most of the Cantonment Street ledge, this is not enough to ensure the site remains skateable and continues to hold its cultural significance. Condition 38 provides a balanced heritage outcome – preserving both the wool history of the early 20th century and the unique cultural history of the skateboarding community that has thrived there for nearly 40 years. The ledge is not a museum piece; it must remain a functional and safe space for ongoing use. The proposed removal of the 1.6m section of ledge to create an additional retail doorway will significantly damage the skate spot. This southern section is the longest, most skated, and most culturally significant part of the Woolstores. Its removal would not only harm the local community but also diminish Fremantle's international reputation as a skateboarding destination. Appealing Condition 38 risks creating more conflict between pedestrians and skateboarders, undermines Fremantle's own recognition of skateboarding as a vital cultural asset, and ultimately threatens to erase decades of social and cultural heritage that cannot be replaced. Fremantle has long celebrated its reputation as a cultural hub. Protecting Woolstores in its current form ensures that skateboarding continues to contribute to this identity, offering both cultural value and future tourism potential. On a personal note, Woolstores has been a huge part of my connection to Fremantle – it's where I've spent countless hours with friends, building community, and feeling part of the city. Losing that space, or having it compromised, would mean losing a part of what makes Fremantle feel like home. I respectfully ask the City to uphold Condition 38 and protect this vital piece of Fremantle's cultural heritage.
95.	As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict

	between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained.
96.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen. 11. The port, the wool industry and skateboarders at Woolies are arguably some of the most iconic aspects of Fremantle's cultural heritage. The successful appeal of Condition 38 risks the loss of this important cultural heritage for Fremantle. As a skater, I would like to remain an active part of Freo. The successful Appeal of Condition 38 will destroy the cultural history of the skateboarding community, who are historically the most important active stakeholder of the site. 12. The ledge and the skateboarding connection to Woolies has been a part of Fremantle for almost 40 years. This space is an international icon that can not be lost. 13. The Appeal submitted by Human Urban is full of contradictions involving comments they've previously made through their DA and what they have recently stated in their appeal. Do we really trust them to deliver a development of this scale if they can't take the time to get their facts straight? 14. Fremantle is sold as a cultural destination. If skateboarding is not protected at Woolstores in its current form, Fremantle will lose yet another valuable cultural asset. The successful appeal of Condition 38 will destroy woolstores as a cultural asset. 15. THIS IS FREMANTLE. The Skateboarders at Woolies have been previously used by Visit Fremantle to advertise Fremantle to the world. We deserve to be protected and our space needs to be preserved as it is. Mayor Fitzhargine and the wider Fremantle Council have recognised the skateboarding community as the cultural custodians of the building for the last 40 years. Our community needs to be protected and our ability to exist at Woolstores in its current form retained. 16. The Development Application only briefly mentions skateboarding's contribution to the cultural heritage value of the site. The Heritage Council of Western Australia is currently considering a place nomination of the skateboarding ledge to be included in an amendment to the current Heritage Listing of the 1927 portion of the Wool Store. HU's minimising comments of the skateboarding community and its use of the ledge in their appeal of Condition 38 contradicts their previous words and actions relating to the significance of skateboarding at the site in parts of their Development Application.

17. HU have not uncovered or added any new information to aid in their appeal. They are simply unhappy with the decisions of both Fremantle Council and the Inner Metro DAP and are hoping for a different panel of DAP members to vote and rule in their favour. A successful Appeal from HU would go against the decisions of both Fremantle Council on 9/04/2025 and of the Inner Metro Development assessment Panel on 29/04/2025, rendering both of those decisions and votes completely irrelevant.
18. This appeal to remove condition 38 goes against wider community and key stakeholder sentiment with HU's own suggestion that they have communicated inappropriately with Fremantle Planning to undermine the decisions made by Fremantle Council and the Development Assessment Panel.
19. Condition 38 does not affect HU's ability to activate the space underneath the awning in front of these potential future businesses. They are sensationalising and exaggerating the effect Condition 38 will have on their development in terms of Cantonment Street Activation.
20. The appeal of Condition 38 shows that HU has no interest in incorporating the concerns of the community that have been previously accepted and approved by the Local Government and DAP. Again, no additional information or evidence has been provided in this appeal. The same information is being presented by HU and should be seen as nothing more than a waste of time.
21. HU says they are focusing on finding skate-aligned tenancies for the businesses within the Cantonment Street Facade, this will increase the amount of skateboarders within the area and the overall importance of this singular remaining community stakeholder group. These future skate-aligned businesses and the future growth of skateboarding within the Cantonment Street Precinct solidifies the importance of retaining the 1.6m of ledge in front of the current window and the social and cultural history associated with it.
22. Griffith's Architects' December 2024 Heritage Assessment Review and Impact Statement does not adequately take into account the social and cultural importance of the ledge and skateboarding area underneath the awning. Instead it chooses to ignore skateboarding almost entirely, disregarding the almost 40 years of cultural heritage contribution made to the building. In February 2025 the Heritage Council of WA developed advice for the City of Fremantle that included the heritage importance of the skateboarding community. Griffith's Architects failed to notice or incorporate this advice in their assessment. Griffiths Architects Heritage Assessment instead went on to state that the "The Cantonment Street Awning and Plinth" has little State Significance based on its aesthetic value, has no Historic value, no Social value or Rarity. As of May 2025, the "Skateboard Ledge" on Cantonment Street is currently under consideration for inclusion in the Registered curtilage of the 1927 Wool Store building as an amendment to the current Heritage Registration. This shows that Griffith's architects either did not do their full due diligence when researching the Social and Cultural history of the building, or they have purposely omitted this information from their report, as "skateboard plinth" is only mentioned once in the entire document - not much would have changed in 6 months time regarding the skateboarding cultural heritage of the space..The skateboarders of woolstores are widely known around Fremantle, Australia and in the international skateboarding and tourist community - to mention the "skateboard plinth" only once does this community a disservice.
23. The relocation of Circus WA into a building purchased with Fini Group's support away from Cantonment Street and out of Princess May Park will minimise and affect the activation opportunities of the Cantonment Street Precinct. Their Development Application states that Circus WA is a part of their targeted Community and Stakeholder Engagement.They were deemed important enough by Human Urban to have them speak in favour of HU's development at both the Fremantle Council Meetings and the Development Assessment Panel. With Circus WA's relocation set to occur prior to the completion of the development, it is now more important than ever to protect the retention of skateboarders as the last remaining long-term community stakeholder group activating the streetscape and guaranteeing ongoing activity, life and passive security on Cantonment Street post development.
24. It is my understanding that the F+B retail spaces "affected" by Condition 38 are prohibitively expensive in comparison to other similar offerings in Fremantle and WA. Why would skateboarding sympathetic retailers rent these expensive spaces if the skateboarding heritage of the Elders Wool Store is actively destroyed by Condition 38 being appealed? This condition was added by Mayor Fitzhardinge to ensure ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies. A successful appeal will decrease the appeal for skateboarding sympathetic retailers, which will contribute to the epidemic of empty retail spaces in Fremantle.
25. The amount of skateboarders who use the site fluctuate throughout the year. The fact that the site has been continuously used since it was first skated in the late 1980s shows that it is of utmost social, cultural and historical importance. Even in its current dilapidated state, skateboarders come from far and wide into the City of Fremantle to visit Wool Stores. The amount of skateboarders who visit and use the ledge will likely increase after the redevelopment as they will be drawn to the "skateboarding sympathetic" businesses HU are sourcing as tenants. Using data as a 'gotchya moment' to prove a point when the current conditions do not reflect the future conditions of the skateboarding space serves no merit in the appeal of Condition 38.
26. The appeal document suggests very minimal use of the space by skateboarders, citing an average of 90 minutes of use per day - equating to less than 10% of potential trading hours. For this to be accurate, trading hours would need to be more than 15 hours per day. For an 8 hour trading day this would be 19%. Skateboarding at Woolstores typically occurs in the mid to late afternoon, which represents a quieter period for retailers and food and beverage operators in Fremantle. This means that if protected, the ledge and skateboarding offers an invaluable opportunity that will contribute enormously to the ongoing activation of the streetscape throughout the day.
27. The comment that "just 1.6m of existing structure, representing 1.8% of the total retained heritage facade" (page 4) is factually incorrect and misleading. The heritage facade is ~40 metres long, with the 1950's portion (~60 metres) being listed only on the municipal heritage list. Considering this correction, 4% of the heritage facade is in fact being altered. More than double what has been stated by HU.
28. Figure 1 - Cantonment Street Elevation on page 4 of the Appeal fails to identify the northernmost 15 metres of the facade that has been approved for removal. This intentional omission is misleading and inappropriately represents the level of ledge retention. There is also no mention that the 5.6 metres of skateable space being interrupted or removed from the retained heritage facade are the most used sections of ledge by skateboarders.
29. Point 2 of the Conclusion is factually incorrect and misleading. "The condition conflicts with best practice heritage principles and is not supported by the City of Fremantle or HCWA." HU have not outlined how it contradicts heritage principles in the appeal? In fact, the condition was supported on the basis of retaining the modern heritage of the space and the significance of skateboarding cultural input to the building's heritage. Heritage is ever evolving and does not simply mean returning to an original form. The ledge and window/door in its current form, have been in their current form for more than 60 years of the building's 100 year life - this was discussed at length at the previous JDAP. The comment also suggests that the City of Fremantle does not support the condition? The condition was submitted by Mayor Fitzhardinge and supported by a Council vote on 9 April 2025.

	30. On page 6 of the Appeal the first of the two quotes has been incorrectly attributed to having come from the West Australian Skateboarding Association. The quotes are from an article posted by *Fremantle Shipping News*, The passage from the article: *Zachary Tilghman of the Woolstores Forever Committee of the West Australian Skateboarding Association has told Shipping News how incredibly pleased with and grateful the skateboarders are that H-U has made several large-scale changes to their project to include the skateboarders. Zach says that H-U are setting a precedent for community inclusion and engagement with the Elders Wool Stores site. He adds that: 'A cohesive mixed-use space that respects all future stakeholders will not come without challenges, but their collaborative approach and continued willingness to work openly and honestly with WASA has paved the way for a bright future for generations of Western Australian Skateboarders to come.'*
97.	I am writing to express my strong opposition to the developer's appeal for the removal of Condition 38. The developer's survey data is misleading and should not be used to justify the removal of this condition. The survey was conducted during a period of low usage (May-June), and the results do not reflect the year-round importance of this site. Removing the most skated portion of the ledge will destroy the very thing that draws skateboarders to the area, which undermines the developer's plan to attract "skateboarding sympathetic" businesses. This iconic spot has been continuously used by skaters for over 40 years, and its cultural significance should be preserved, not diminished by an unrepresentative survey. I urge the council to retain Condition 38 to protect this important community and cultural asset.
98.	Response Opposing Human Urban's Appeal of Condition 38 As an active member of the skateboarding community, I strongly oppose Human Urban's appeal to remove Condition 38 from the Elders Wool Store development approval. While it is acknowledged that portions of the ledge along the Cantonment Street façade are being retained, this alone is not sufficient to ensure that the space continues to operate as the iconic skate spot it has been for decades. Human Urban has repeatedly stated that "85% of the ledge" will remain, yet they have failed to commit to its continued use as a functional skate space. Without Condition 38, there is no binding guarantee that the ledge and the surrounding area will remain accessible and skateable. Condition 38 is the mechanism that ensures this important part of Fremantle's cultural identity is preserved as a living, active element—not reduced to a static architectural relic. Skateboarding and street culture form a significant part of Fremantle's heritage and cultural capital. In recent years, many similar urban spaces have been lost across the city, erasing vital outlets for youth culture, community gathering, and creative expression. Removing Condition 38 will directly result in the loss of one of the most important and longest-standing skate spots in the region. This outcome is entirely inconsistent with Fremantle's reputation as a city that values diversity, cultural expression, and inclusivity. Furthermore, this appeal appears to undermine the collective sentiment of the wider community and key stakeholders, including Fremantle Council and the Development Assessment Panel. Human Urban's own communications suggest that there have been inappropriate attempts to reframe or override the original planning outcomes. This lack of transparent engagement raises serious concerns about their commitment to respecting community values and cultural heritage. For these reasons, I urge the responsible authorities to reject Human Urban's appeal of Condition 38 in its entirety. To do otherwise would not only compromise the integrity of the Elders Wool Store as a cultural landmark, but also permanently damage Fremantle's living street culture and its recognition as a place that celebrates authentic community identity.
99.	I am writing to you today regarding Human Urban's proposed redevelopment of the iconic woolstore building. Specifically their intent to create additional entry ways by removing several key 'doorway' sections of the Cantonment street facade ledge that are cherished by the local skateboarding community. These 'doorway' sections are in fact the most important parts of the ledge for skating as they don't have the protruding window sills that exist along the other 85% of the ledge that human urban claim they are 'preserving' for the skateboarders. The 85% they claim they will preserve is actually the most dangerous section to be skated and is often avoided entirely by skateboarders. Human Urban have no intent to actually work with the skateboarders in their design of the facade and have gone for a 'low effort' option that has required minimal co-development or consideration for how their development could actually enhance instead of hinder a space the fremantle skateboarding community have continuously utilised and inhabited for multiple generations over 30 plus years. An apt metaphor would be for someone to remove the strings off a guitar and pretend that it's still an instrument because you can tap it like a 'drum'. Without the strings it simply does not have the same magic it had before and would not be enjoyable to play or listen to. These key doorway sections without the windowsills are what makes the ledge an internationally renowned skate spot of the highest caliber, a must-visit destination for international professional skateboarders. It has allowed many local skateboards to excel at their craft, becoming some of the most talented and well known skateboarders within Australia, essentially putting Fremantle on the map as a core cultural hub of skateboarding within australia. Human Urban's proposal threatens to jeopardize all of this. I write to you today to please consider the above when assessing Human Urbans appeal of the decision to retain the core skatable sections of the ledge.
100.	I wrote as a member of the Fremantle community, future architect, and part of a sub-culture that is often ignored due to legislative technicalities and outdated religious views; the queer community. As a member of the queer community, it is easy for developers and designers to ignore the importance of heritage from the perspective of 'sub-cultures' and

	oppressed groups. Simply because organisations who are instrumental to the decision of heritage are often from positions of privilege. As someone who understands the importance of sub-cultural impacts of the socio-historical drive of place, I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. The removal of this ledge erases the history which has been developed over the past 40 years. Fremantle has strived to bring in communities, of artists, creative and free thinkers, families, and overall those who express themselves freely. Removing this icon of activity - of habitation - damages that vision of Fremantle. It dilutes the creative and freedom elements that attracts people to Fremantle. I urge you to retain Condition 38 and remove Urbis and H-U that the history of the small and forgotten are just as important to Fremantle.
101.	I am writing to urge you not to destroy the woolstores ledge. Just like reefs in the ocean, some things are best left untouched - especially a heritage listed building. There are so many shops and apartments in Fremantle already, do you really need more? Restore the one's that are currently vacant on the main strip first before you go destroying cultural icons.
102.	As a skateboarder I believe the ledge should be left entirely in tact as removing even a small piece of ledge could be detrimental to the original feel of it. Me and many other skaters travel to Fremantle specifically for the ledge. Please don't alter it.
103.	I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed.
104.	This is absolutely ridiculous, why is Human Urban appealing this? I am a Freo local skater and I definitely don't support the appeal of Condition 38, here's why. Cutting the ledge in front of the window and turning it into a retail doorway will ruin the Woolstores' iconic skateboarding spot. The doorway ledges are the main part people skate. Why is H-U pushing this again after so much debate and back-and-forth? It's a waste of time and taxpayers' money. Skateboarders are embraced when it comes to promoting Fremantle, and Woolstores is a part of that culture. The ledge deserves to be protected in its entirety. I was just at Macba in Spain, and it's disgusting how the city removed most of that world-famous skate spot, while still piggy-backing off skateboarding culture for tourism. Please don't let the same thing happen here in Freo. Adding more doorways doesn't just harm the spot - it also increases risks for both skaters and pedestrians. It's not sensible planning.

	Oh also the surveyance monitoring?? Was the weather taken into account lol. Like it rains a lot during June ... Obviously you can't skate in the rain. Maybe this should be redone during a one year period or during Autumn or Spring. Like the fact this monitoring is even brought up in H-Us appeal is quite ridiculous and shows they really don't have a clue. Appreciate your understanding on this important matter.
105.	As a member of the skateboarding community, I strongly oppose the appeal or removal of Condition 38 from the development approval for the Cantonment Street site. While it is acknowledged that a portion of the ledge along the building's façade is being retained, this is not sufficient to ensure that the space continues to function as a legitimate, usable skate spot without Condition 38 remaining in place. Human Urban has not provided any formal commitment that the ledge and surrounding area will continue to operate as a skateable space. Simply stating that 85% of the ledge will be retained does not guarantee its ongoing functionality or accessibility for skateboarding. The ledge must be preserved not just as a physical structure, but as an active, living part of Fremantle's cultural heritage — not reduced to a static museum piece. Mayor Fitzhardinge rightly included Condition 38 to safeguard the ongoing skateability of this important public space. The condition ensures recognition of the site's cultural value and aims to allow skateboarding to continue safely, by minimising potential conflicts between skaters and pedestrians accessing nearby commercial tenancies. Removing Condition 38 will undermine these objectives. It will: • Increase the risk of collisions and conflict between pedestrians and skateboarders. • Erase a significant part of Fremantle's cultural identity and skate history. • Undermine the long-term activation and vibrancy of the Cantonment Street precinct. I urge the Council to uphold Condition 38 in full to ensure this culturally significant skate spot remains an inclusive and safe public space for all.
106.	I am writing as a Fremantle resident to oppose Human Urban's appeal to remove Condition 38 from the Elders Wool Stores development approval. The Wool Stores are not just an industrial landmark — they are also one of the most important cultural spaces in Fremantle. For over 40 years, skateboarders have used the Cantonment Street ledge, making it internationally recognised as one of Australia's most iconic skate spots. The section of ledge in front of the central window is the most important and most skated part of the site. Removing it to create another doorway will destroy the functionality of the spot and erase decades of cultural heritage. Condition 38 was introduced to balance redevelopment with cultural preservation. It protects both Fremantle's history and its living culture. Without it, the Wool Stores will lose their unique identity and Fremantle will lose another irreplaceable cultural asset. For these reasons, I urge you to reject Human Urban's appeal and retain Condition 38 in full.
107.	I DO NOT support Human Urban's appeal or the removal of Condition 38. Condition 38 is vital in preserving both the Wool Stores' heritage and the cultural significance of skateboarding at the site, which has been an iconic community space for nearly 40 years. Removing the 1.6m of ledge in front of the central window would destroy the most skated and most important section, undermining Fremantle's cultural identity and international reputation. The appeal provides no new evidence and disregards Council's and DAP's previous decisions. I strongly urge that Condition 38 remains in place.
108.	1. As a member of the skateboarding community I DO NOT support the appeal or removal of Condition 38. I understand that most of the ledge along the Cantonment Street facade of the building is being retained, however, more needs to be done to ensure the ledge and the space surrounding remains skateable by Condition 38 remaining. Human Urban are yet to formally agree or commit to the space operating as a skate spot going forward - they have simply continued to state that 85% of the ledge will be retained. It needs to be retained as a functional element of the building's cultural heritage, not a museum piece. 2. I believe that Condition 38 provides a balanced heritage outcome, preserving both the Wool History of the early 20th century and the unique cultural history of the skateboarding community that has developed there over the last 40 years. Condition 38 should remain and not be removed. 3. Cutting the 1.6m of ledge in front of the window, and turning it into a F+B retail doorway will ultimately ruin and kill the skateboarding spot. This will destroy the unique social and cultural heritage developed by the skateboarding community there over the last 40 years, that has been underappreciated by the developer. The 1.6m of ledge in front of the window is the most important and most skated part of the entire woolstores due to the fact it is the longest section and has no window sills or other protrusions from the facade that obstruct the ledge and risk injury - unlike the northern portion or 1950's section of the building that HU are suggesting will remain as new, longest uninterrupted section of the ledge. Removing this small yet incredibly important section of ledge will significantly damage the spot, reducing its functionality and its significance internationally. 4. Drawing on Sylvain Tognelli's mapping of the ledge's use by skateboarders (referenced in HU's Landscape Design Report) as well as Human Urban's survey footage, an indisputable argument can be made for the fact that the southern portion of the ledge is the most significant portion. This area contains the two doorways that are being appealed. Referring to the West Australian Skateboarding Association's Video History Timeline there is irrefutable evidence documenting the use of the ledge - showing that the use of the window ledge and the remaining southern portions are the most culturally significant assets. The portions of skateboarding ledge that will be removed and/or affected by the appeal of condition 38 are the most used and most important to the local, national and international skateboarding communities. The opening of the southernmost entry, and the removal of the ledge in front of the window will negatively affect the international reputation of Woolstores as a skateboarding destination, affecting the international reputation and future tourism opportunities for Fremantle. 5. The survey conducted by Human Urban has not been shared and thus lacks adequate detail to be considered seriously. The survey was also conducted during May and June, a period of wet and cooler weather where the

	space is less frequented. It is the opinion of the West Australian Skateboarding Association that this survey should be conducted daily over the course of at least one year if it is to be considered accurate and accepted as evidence in any planning application or appeal. Ledge use fluctuates throughout the year and peaks during summer months. After the building is redeveloped, and skateboarding sympathetic retailers are found for the spaces like HU has stated, the number of skateboarders using the ledges affected by condition 38 will increase. 6. Mayor Fitzhardinge included Condition 38 to ensure the "ongoing skateability of the ledge in recognition of the cultural significance of the place and to ensure skateboarding can occur safely by removing potential conflict between skaters and people accessing the commercial tenancies." Appealing Condition 38 will increase collisions and potential conflict between pedestrians and skateboarders, will destroy the cultural significance and will ultimately be the root cause of the failed activation of the Cantonment Street precinct. 7. The Cantonment Street facade should have minimal entries and exits. I believe six functional openings is overkill for an approximately 100 metre facade. This equates to approximately one doorway every 16 metres - some of which are up to 4 metres wide. If this appeal is successful, approximately 20% of the Cantonment Street facade will become permeable. This is unacceptable and poses great risk to the ongoing safe use of the space as a skate spot. By retaining Condition 38 this risk is significantly reduced. 8. I support the refurbishment of the original heritage openings on cantonment street however, they should not all be functional doorways. The entries on the 1927 portion of the building should be condensed from 3 to 1. Condition 38 should remain. 9. The successful appeal of Condition 38 will make woolstores harder to skate, less enjoyable to skate and will ultimately end up killing the spot for skateboarders. 10. Skateboarding and 'street culture' is an important part of Fremantle's history and cultural capital. In recent history we have seen a massive loss of these types of spaces in the urban environment and it is critical that we don't lose another one. A successful appeal of Condition 38 will directly cause this to happen.
109.	I am writing to you today in regards to Human Urban's request to amend the current approval of Condition 39. First and foremost, Wool Stores has remained an internally unused, historical artefact on Cantonment Street for an immense amount of time. For 40 years, Wool Stores has been repurposed by local, interstate and international skateboarders as a cultural skateboarding space that has been utilised by myself, and thousands if not more skateboarders. There are not words to put the importance of this space into perspective for the persons whom contribute their opinions into the redevelopment of Wool Stores, simply because the ability to empathise the importance can not be described and fathomed unless you yourself have utilised the space in this way yourself. I'd like to mention Figure 1, in Human Urban's request to amend: Figure 1 - Cantonment Street Elevation  In this diagram, there are two edits to the original skateboarding ledge shown (in red). This is indicating that Human Urban's request is to remove two sections of the ledge and turn them both into doorways. Also shown are the three other gaps that already seperate the ledges, which will already be turned into doorways. There are three problems that arise with this diagram. First of all, the pre existing gaps that have been approved as doorways, will already provide immense foot traffic to the space that is used by skateboarders in Fremantle. Adding an additional two doorways to this space will result in an even higher level of foot traffic, which could cause a higher risk in conflict between tenants (tourists, people in use of retail facilities etc.) and skateboarders. Secondly, the need for 6 doorways in an approx. 100m of the facade can been seen as completely unnecessary. There is no need for a doorway (up to 4 metres wide) every 16 metres. Last but not least, the diagram shows again the spaces Human Urban is requesting for an extra two doorways. The spots these doorways are being requested to be in for the most skated parts of the ledge, which you will see in any 'Wool Stores skateboarding videos'. Implementing these unnecessary doorways in these spots will be detrimental to the cultural environment of the ledges and cause immense deterioration to the important skateboarding culture past, present and future at Wool Stores, in Fremantle, and also affect the tourism drawn to the biggest part of Wool Stores, which is skateboarding. I hope this email finds you well, and is taken with the upmost respect and empathy of the skateboarding community. This IS NOT too much to ask, and will not be taken lightheartedly by majority of the community whom can find the importance to empathise and push for our heritage and community to be taken seriously. Skateboarding and the people within the community have come so far to gain recognition especially over recent years. It is a sport competed at Olympic levels, and deserves to be treated as such.
110.	Dear Sir/Madam I am writing in response to a letter from the Council regarding Human Urban's amendment of Development Approval (Removal of Condition 38) of the Elders Woolstore Redevelopment. First, I strongly support of the application by Human-Urban to amend the restrictive Condition 38. As a resident of Victoria Quay apartments I am directly impacted by decisions made by Fremantle City Council in respect to the former

	Elders Wool Stores. The rationale for amending or removing condition 38 from a planning, heritage and development perspective are clearly and convincingly set out in the application and I endorse the arguments presented. Second, I state my concerns for the manner in which Condition 38 was imposed. Fact 1: Elders Woolstore is a derelict building with asbestos, and rotting internal and roof structures. It is long overdue for demolition or redevelopment. Further neglect of Elders Woolstore increases the risk of structural collapse and associated health risk with asbestos, as well as the continuing dangers of break-ins, vandalism and fire. Fact 2: A handful of skateboarders sporadically come from time to time to use the ledge for skateboarding, not because they have a right but because no one has stopped them. The skateboarders leave rubbish, daub graffiti on the walls, remove public seating benches, and block access by the public to the adjoining footpath. I, like other residents, have put up with this situation for years in the hope of the long awaited redevelopment of Elders Woolstore. Fact 3: News of the redevelopment of Elders Woolstore motivated the skateboarders to organise an aggressive advocacy campaign. The campaign exaggerates the usage and value of the ledge. The campaign has generated <u>one sided arguments</u> which have garnered the support of local councillors and influenced the JDAP to imposing Condition 38 . Specifically, neither Cr Jemima Wong-Williamson who read out a prepared statement in support of retaining the ledge at the JDAP nor Cr Andrew Sullivan who has publicly supported the skateboarders, have ever consulted with me or to my knowledge any local residents. Nor have the councillors shown any data measuring actual usage of the ledge. As result, the publicly voiced opinions of the councillors at best ignore the voices and concerns of local residents and at worst are influenced by a small but vocal lobby group. Thank you for the opportunity to provide my feedback.
111.	I write to state my strong support of the application by Human-Urban to amend the restrictive Condition 38. As a resident of Victoria Quay apartments I am directly impacted by decisions made by Fremantle City Council in respect to the former Elders Wool Stores. The rationale for amending or removing condition 38 from a planning, heritage and development perspective are clearly and convincingly set out in the application and I endorse the arguments presented. The point I wish to add concerns the role of the Council and JDAP in responding to the concerns and interests of the Fremantle community. Preserving heritage is a vital aspect of this role and is essential in making sure that Fremantle retains its place as one of the most attractive places to live in WA. Sometimes this means standing up to pressure from developers when their plans undermine the integrity and aesthetic that the City seeks to preserve. I also recognize the danger that preservation of heritage can act as a licence to some in the community to say no to anything beyond the most anodyne development. Neither is the case with Elders Wool Store. The design is innovative but also retains key aspects of the structure and street-scape. While there have been some concerns about the exact height of some parts of the building, the general reaction has been positive. Public consultations have not elicited any serious opposition – indeed quite the contrary. What is different in the case of this application is that a small but vocal lobby group have pressed their concerns and co-opted elected council members to pursue and advocate for them. Having attended the public consultation earlier in the year, the **<u>only</u>** point of discussion was the skateboarding ledge. I understand from reports of the meeting at which Condition 38 was proposed that the Councillor for City Ward read a statement in support of the skateboard community. Whether this was written by her or for her, it raises questions about the degree to which she has reached out or consulted any other of her constituents. We certainly have heard nothing. Lastly, I note and endorse the points in the H-U application about current usage – a few people, irregularly. The notion that the ledge is of international renown is, frankly, unconvincing. Even if it is known to a few die-hard aficionados of one kind of skateboarding, its adherents form a vanishingly small proportion of Fremantle's visitors. I would be very surprised if they outnumbered the residents of VQ apartments. In the long run, there is no way that the eventual commercial owners of the new facilities on Cantonment Street, or the residents of the new apartments are going tolerate the noise and mess caused by skateboarders. Realistically, the concessions made to this small community merely postpone the inevitable. Life moves on. In the meanwhile, undermining the integrity of the whole concept by reducing access in order to retain less than 2m of ledge verges on the absurd. Further, the role of elected councillors in supporting this restriction by taking into account the highly partisan concerns of a small lobby group raises serious concerns about the legitimacy of their mandate.
112.	To the Members of the Development Assessment Panel, I urge you to remove Condition 38 from the Development Approval for the Elders Woolstore, which is an essential project for Fremantle. We have heard arguments about how important this ledge supposedly is and that it is an attraction for skaters all over the world. Councillor Andrew Sullivan even claimed that the ledge was as significant for Fremantle's international reputation as winning the America's Cup was. That is nonsense. If the ledge is so loved by skaters why are not hundreds of them using it every day of the week? Instead it is shown that it is only sparsely used by a mere handful of skaters. The statement that the skater have cultural heritage entitlement to the ledge is also nonsense. The only people entitled to use the building are the owners, who paid millions of dollars for it and want to spend $ 110 million on the project. Those who trespassed on private property for some thirty years have no entitlement to continue to do so. How can Fremantle Council and JDAP take the risk of putting the development in jeopardy, to accommodate a very small group of people, who want to continue their hobby at the building? Why is that group prioritised ahead of the Fremantle community and the common good? **We have an enormous housing crisis. This building will create homes for some 500 people, including student accommodation. Fremantle is desperate for residential urban infill, which this development would provide. Our city has been stagnating for decades and needs growth and progress, which this development provides.**

	The Elders Woolstore has been a vacant eyesore and embarrassment for Fremantle for over thirty years, in the run down inner East of our city. This development will see real 24/7 activation of the area, with hundreds of people living, working an visiting the area. It will be a huge game-changer for Fremantle when this iconic building, a good mix of heritage and modern architecture, will be built. Fremantle can not afford to not let this development proceed. We need this building project desperately! We need that activation! We need those new homes! **This development will be the biggest ever adaptive reuse heritage project in our city. It will be huge and fantastic and will enormously change that neglected part of Fremantle. That precinct will become an attraction and destination for locals and international and interstate visitors alike. We can not afford to not go ahead with the exciting development! Freo needs it!** Are we really letting 1.6 metres of a low concrete ledge risk that the developers might walk away from this? If they do, the old building will fall into even more disrepair and collapse. Please do reconsider your previous decision and remove Condition 38, which is a serious restriction and a threat to this development going ahead. We need more homes. Fremantle needs more urban infill. We need more people living in our inner city! We need this development!
113.	I support the developer's request to remove Condition 38 from the Elders Woolstores development proposal. Condition 38 is unnecessary, as the Development Application (DA) involves reinstating the original heritage doorways, which should not be considered problematic. This condition reflects excessive heritage restrictions, often driven by overly cautious heritage advocacy. For example, the Fremantle Coles Woolstores redevelopment demonstrates how developers are forced to shift from innovative, high-quality designs to low-cost, uninspired ones, resulting in features like the large, unattractive painted concrete wall on the west side. Regrettably, the council's "My Say" process can foster unnecessary community division. Of course, we must thank the heritage campaigners for their overzealous influence, which so brilliantly ensures poor outcomes by derailing original, well-considered designs.
114.	I would just like to comment on the above amendment to DAP005/24. I live nearby in xxx and frequently walk past this ledge a couple of times a day whilst walking my dogs. When I first heard of the clause, I couldn't believe it, as I very rarely see anyone using it, and I thought then why doesn't the developer setup cameras, and do some recordings which will prove it. Unbeknown till I just read this report to the amendment that the developer has done just that, and I am not surprised of their findings. I will add that when I do walk past that ledge, sometimes when few individuals have used it, I always often find lots of rubbish left on the ground, and I do find it is a draw card sometimes for that type of anti social behaviour. I myself do not see any benefit in this ledge at all and think that the overall scheme of what the developer wants to build and present far outweighs for the few people that use it, then the tens of thousands that will benefit from this development. This ugly eyesore at the moment and has been as such for a very long time. So, to have this jeopardise the development would be such a shame.

Response to Public Submissions

Table 1 below provides a summarised response to the key matters raised in public submissions.

Table 1 – Summarised Public Submission Responses

Key Issue Raised	*Applicant Response*
Perceived Social and Cultural Value of the Skateboarding Ledge	Numerous comments have been made regarding the perceived social and cultural value of the skateboarding ledge. As noted in Urbis' amended application (dated 10 July 2025), the Project Team has worked hard to meaningfully retain as much as of the skate ledge as possible and ensure as much space around the ledge remains, all of which is located within the private boundaries of the subject site and not a specific development control, heritage or planning requirement. This has been undertaken under the premise that while the ledge is not specifically referenced in the sites Statement of Significance relating to the sites State Heritage listing, H-U and its Project Team were very mindful of its social and cultural value from the outset and has sought to achieve a fine balance to enable the mix of uses and activities to operate as seamlessly as possible. It is noted several submissions refer to the recent heritage nomination made to DPLH in respect of the skateboard ledge for consideration of the place for the State Register. This nomination does not alter the heritage context and level of significance of the skateboard ledge or site whatsoever. In a response from DPLH dated 10 June 2025 regarding the nomination, DPLH stated that: • *'The Heritage Council considers that Skateboard Ledge, Cantonment Street, Fremantle is unlikely to have the cultural heritage significance required for meeting the condition for entry in the State Register under section 38 of Heritage Act 2018 as an individual place'.* Based on the above and the current heritage status, there remains no formal recognition of the ledge or its significance. Further, DPLH did not consider the ledge sufficiently important to mention it in their assessment of the development, both as part of the original development application and this amendment. Condition 38 is therefore not aligned with the planning principles of any relevant legislation or documentation, such as the Heritage Register documentation and City of Fremantle Scheme List documentation. Importantly, even in the unlikely context (based on DPLH advice) of the ledge achieving the cultural heritage significance required for meeting the condition for entry in the State Register, there is no (and will be no) requirement in this circumstance for the structure to be maintained in its entire form. Regardless of its heritage status, the proposal to maintain ~85% of the skateable portion of the ledge on Cantonment Street is an exceptional outcome for the skate community and in acknowledging its social value. In summary, while H-U has actively sought to engage and retain as much of the ledge as possible in recognising its sub-cultural importance, there is no strict heritage requirement for this, and its full retention compromises the activation outcome being sought. The skating community is part of Fremantle's social fabric and while not unimportant, the overall community benefit of the development should be paramount.

	As City of Fremantle Officers' reports have indicated and decision-makers have expressed, spaceagency has produced an outstanding design solution for this place, balancing a range of complex and often-competing factors. The design has sought to balance a comprehensive range of issues including architectural design, heritage conservation, access and street level activation.
Safety and Functionality	We note the concerns raised in relation to safety, in particular the perception that Condition 38 will guarantee safe co-existence between skateboarders and pedestrians by limiting unnecessary openings along the Cantonment Street façade. While this perception of improved safety is noted, there needs to be due consideration of all proposed users of the site, not just the skateboarding community – including tenants and visitors. Achieving this balance has been a priority throughout the entire design process. Restricting all pedestrian access from Cantonment Street has the ability to significantly impact safety, functionality and activation outcomes within the development more broadly. These matters are highlighted in the Urbis' amended application (dated 10 July 2025), and are summarised as follows: • In two out of the three food and beverage/retail developments, the proposed doorways provide the only access into the development. Alternative access points are considered to be inappropriate for use by these tenancies due to potential conflicts with the residential and office uses in the development. • Utilisation of the original access ways into the building is entirely logical and appropriate, and the proposed haphazard closing off of these points is considered (and will be experienced as) an odd sequence of function, architecture and aesthetics. • Restricting access will significantly impact the commercial viability and leasing potential of the ground floor tenancies, inhibiting active street frontage and comprising broader placemaking outcomes being sought by the City of Fremantle and Cantonment Street landowners.
Validity of Survey Data	We note that several submissions questioned the validity of the survey data and specifically the timing that the survey was undertaken (May/June 2025), noting that due to the beginning of winter, this likely was not a good representation of the typical use of the ledge. H-U disagree with these statements for the following reasons: ▪ Whilst the survey was conducted in May and June, the unseasonably warm and dry weather during this period provided ideal conditions for use of the ledge. The suggestion that the survey being undertaken during this time and returning unreliable data based on weather is simply not correct. ▪ Specifically, data from the Bureau of Meteorology records only six (6) days in the period registered rain greater than 5mm and of these only two (2) days were considered heavy rain equating to only 5% of the surveyed days. Maximum temperatures over the period averaged 23 degrees Celsius, well above Perth's long-term average. ▪ The suggestion that survey data should be collected over an entire year (or longer) is simply not practical and is highly unlikely to deliver a vastly different data outcome than what was generated. The survey data collected was a sample reflective of a general use of the ledge and demonstrates infrequent use of the ledge.

Department of Planning, Lands and Heritage
GOVERNMENT OF WESTERN AUSTRALIA

Your ref: DAP005/24
Our ref: P0852-52099
Enquiries: Chloë Parkinson (08) 6552 4028

Chief Executive Officer
City of Fremantle
planning@fremantle.wa.gov.au

Attention: Erik Dybdahl

Dear Sir

Thank you for your referral to the Heritage Council under the provisions of section 73 of the *Heritage Act 2018* as described below:

Place Number	P0852
Place Name	Elders Wool Stores
Street Address	38 Cantonment Street, Fremantle
Referral date	3 January 2025
Proposal Description	Mixed use development of Lot 201 Goldsborough St (Elders Wool Store 1927) and Lot 40 Cantonment Street (Wool Stores 1952

We received the following information:
Restoration and Redevelopment of the Elders Wool Stores – Urbis -17 December 2024 (446 pages)
Development Plans – Space Agency – Issued for DA 16.12.2024 (21 pages)

On 28th February 2025, the Heritage Council considered the proposal in the context of the identified cultural heritage significance of *Elders Wool Stores* and resolved to provide the following advice to the City of Fremantle:

Findings

- *Elders Wool Stores*, comprising the 1927 building at the site, has cultural heritage significance as a significant part of Fremantle's industrial landscape. The place is a dominant large scaled robust utilitarian warehouse building and internally is a very intact example of timber industrial structure. The 1952 and 1967 buildings are outside the registered curtilage.
- The place has been underutilised and neglected since the early 1980s.
- The proposed mixed-use development retains and conserves the 1927 building. The intrusive upper 1967 level will be replaced with new additional floors sufficiently setback from the facade.
- The general approach to internal adaptation will be to maintain the spatial qualities, structure and experience of the original warehouse building
- A portion of the jarrah columns and structure is proposed for demolition to form the internal lightwell/courtyard. The intact structural grid should be retained as a dominant internal feature that clearly demonstrates the original warehouse construction techniques, planning and use.

- The steel canopy element interprets the former upper floor but somewhat detracts from the overall presentation of the place.
- Overall, the proposal will result in a positive outcome for the place. Revitalisation of the vacant place will ensure its long-term use and conservation.
- The proposal provides an opportunity to interpret the history, significance and stories associated with the place.

Advice
The proposal, in accordance with the plans submitted, is supported subject to the following conditions pertaining to the 1927 State Registered building:

1. All columns and beams to the 1927 building to be retained to maximum extent, inclusive of the proposed internal courtyard/lightwell area currently proposed for demolition, to the satisfaction of the Director, Historic Heritage Conservation.
2. All original external signage is to be retained and exposed
3. The following further information is to be provided to the satisfaction of the Director, Historic Heritage Conservation, prior to the application of a Building Permit:
    - 3.1. Further details of the proposed ramps and external landscaping to Goldsborough St.
    - 3.2. Further information of proposed works, and associated impact on heritage fabric, required to comply with the National Construction Code.
    - 3.3. An Interpretation Plan for the *Elders Wool Store* that outlines interpretation strategies and implementation proposals to communicate the history, heritage significance and stories of the place, including those associated with the more recent use of the place by the Western Australian and international skateboarding community.
    - 3.4. Prior to application for an Occupancy Permit, a signage strategy that provides for a coordinated approach for tenancy and wayfinding signage is to be provided to the satisfaction of the Director, Historic Heritage Conservation. The strategy is to include method of fixing, location, dimensions, and design for new signage.

Please provide a copy of your determination within 10 days after making the decision, as required by the *Heritage Regulations 2019.*

If you have any queries regarding this advice, please contact Chloë Parkinson at chloe.parkinson@dplh.wa.gov.au or on 6552 4028.

Yours faithfully



Sheree Morrison
Assistant Manager
Historic Heritage Conservation

5 March 2025

cc: Corey Scidone corey@h-u.au

GOVERNMENT OF WESTERN AUSTRALIA
Department of **Planning, Lands and Heritage**

Our ref: P27507
Enquiries: Karina Williams / 6552 4052

Mr Glen Dougall
Chief Executive Officer
City of Fremantle
info@fremantle.wa.gov.au

Dear Mr Dougall,

Heritage Nomination
P27507 Skateboard Ledge, Cantonment Street, Fremantle

The Heritage Council of Western Australia is responsible for the State Register of Heritage Places which recognises and celebrates places of cultural heritage significance that are important in telling the story of Western Australia's people, history and development.

A nomination was recently received for the above place to be considered for inclusion in the State Register.

The Heritage Council considers that *Skateboard Ledge, Cantonment Street, Fremantle* is unlikely to have the cultural heritage significance required for meeting the condition for entry in the State Register under section 38 of *Heritage Act 2018* as an individual place. A copy of the preliminary review is included for your information.

However, the Heritage Council resolved that an amendment to P852 *Elders Wool Stores, 38 Cantonment Street,* which is already entered in the State Register, warrants consideration in detail. This consideration will include a review of the heritage values and physical fabric for *Skateboard Ledge, Cantonment St, Fremantle* to determine whether it warrants inclusion in an amended registration.

Although the Heritage Council has requested the Department provide an updated assessment and proposed curtilage for P852 *Elders Wool Stores, 38 Cantonment Street* for its consideration, the amendment is not a Heritage Council priority at this time

In the meantime, you are welcome to provide any further information you may have about *Skateboard Ledge, Cantonment Street, Fremantle*, as well as your views regarding its cultural heritage significance and possible inclusion in an amended registration. The City may also choose to recognise the local significance of the place by inclusion in your Local Heritage Survey, and/or protect it by inclusion on your Heritage List.

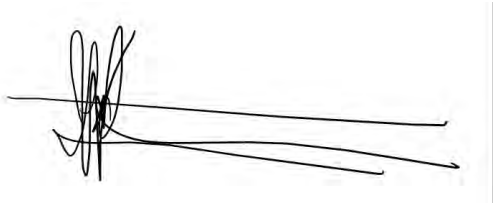
It is important to confirm that this decision does not affect the Heritage Council's statutory advice provided to the City in March 2025 in relation to the proposed development at *Elders Wool Stores, 38 Cantonment Street* (DAP/25/02837), which was approved by the Development Assessment Panel on 29 April 2025.

However, as *Skateboard Ledge, Cantonment Street, Fremantle* is now under consideration for inclusion within a Registered Place, it meets the definition of a heritage-protected place under the deemed provisions for local planning schemes (*Planning and Development (Local Planning Scheme) Regulations 2015*). This means that the Heritage Council would need to be notified of any proposals which may affect the ledge. In the meantime, until an amendment to *Elders Wool Stores, 38 Cantonment Street* has been completed, the Heritage Council's advice on any future development applications would still be provided against the current registration.

The owners of the buildings at *Skateboard Ledge, Cantonment Street, Fremantle* have been advised of this decision.

If you would like to discuss this decision, please contact Senior Heritage Officer Karina Williams at the Department of Planning, Lands, and Heritage on (08) 6552 4052 or at karina.williams@dplh.wa.gov.au. For queries on proposed development which may affect the place contact A/Assistant Manager Liza Mathews on (08) 6551 9068 or at liza.mathews@dplh.wa.gov.au.

Yours sincerely



Lara Watson
A/Director
Historic Heritage Conservation

Enc.

10 June 2025

HERITAGE COUNCIL OF WESTERN AUSTRALIA

PRELIMINARY REVIEW

HCWA Place No.	P27507
Place Name Other name(s)	Skateboard Ledge, Cantonment Street, Fremantle
Location/street address	1 Goldsbrough Street and 38 Cantonment Street, Fremantle
Land description	Part Lot 202 on DP 24212, CT SP42058; Part Lot 201 on DP 24212, Vol 2208, Fol. 338

Owner/s	Private

Local Government	City of Fremantle
Local Heritage Survey	The place intersects with • P00852 Elders Wool Stores, 38 Cantonment Street – City of Fremantle Scheme List: Inventory Category Level 1A, 18 September 2000 • Cantonment Street, Fremantle – City of Fremantle Scheme List: Inventory Category 2

OTHER LISTINGS/REFERENCES
Statutory
State Register of Heritage Places – Intersection with P00852 Elders Wool Stores, 38 Cantonment Street
Aboriginal Site (*under Aboriginal Heritage Act 1972*) – No
Heritage List (Local Government Planning Scheme) – Intersection with P00852 Elders Wool Stores, 38 Cantonment Street
National Heritage List – No
Commonwealth Heritage List – No
Non-Statutory
Other Heritage Place (*under Aboriginal Heritage Act 1972*) - No
Classified by the National Trust – No
Register of National Estate – Intersection with Elders Wool Stores, 38 Cantonment Street

VALUES

- The place is well-known as Perth's oldest and most recognisable urban, street skateboarding spot, and is highly valued by the skateboarding community of Perth.
- The place has been in use by skateboarders since the late 1980s and early 1990s, and through that time has gained international recognition as an exemplary stakeboarding 'spot' for its physical characteristics enabling certain tricks to be performed, and ample shade for gathering, spectating and recording.
- The physical characteristics of the place, and the industrial aesthetic including the graffiti and street posters adorning the exterior, are recognisable and valued components of the place to the skateboarding community in Western Australia.
- The evolving canvas of graffiti, street art, music posters, and street posters reflecting current themes and fashions has been captured over time by a range of media, including videography, photography and social media, and is highly valued by the practitioners and consumers of these forms in its past and current iterations.
- The place may be rare for its longevity of use and as an example of a popular street skateboarding 'spot' in metropolitan Perth.

PHYSICAL EVIDENCE

Summary

Date/s of Construction	1927; 1950-52 [c.1980s – use for skateboarding]
Architectural Style	Inter-War Functionalist, Federation Warehouse
Original Use	Wool storage
Current Use	Vacant/Recreational

Description of the Place

The place is located along the Cantonment Street side of P00852 *Elders Wool Stores, 38 Cantonment Street* (RHP), a massive, four-storey, brick warehouse building in a block bounded by Goldsbrough[1] Street, Elder Place, Parry Street and Cantonment Street to the east. The eastern brick façade is approximately 100 metre long, with a steel awning that covers the 300mm tall concrete plinth that runs the length of the building, with irregular breaks to allow for doorways and larger openings. The concrete floor runs the length of the property.

The Woolstores Forever Committee of the West Australian Skateboarding Association provides the following description of the key element of the place:

> Running along the face of the building is a low metal capped ledge spanning a hundred metres, broken into four long sections. The ledge was created to protect the wall from incoming trucks receiving shipments of wool from the building, meaning it had to be robust. Because of this, it has withstood nearly 40 years of skateboards grinding along it without a single dent. The height and width of this ledge, combined with the slick metal edge and smooth ground creates near perfect conditions for skateboarders to perform "grinds". There are many other ledges of similar composition around the world, but very few can compare to the 100m length of the Woolstores.[2]

---

1 Detailed information on its history, physical description and statement of significance can be found in the Register Entry and Assessment Documentation.

2 West Australian Skateboarding Association, 2025, Woolstores Forever – FAQs, Source: Significance — West Australian Skateboarding Association

DOCUMENTARY EVIDENCE

Significant Associations	Architect: Hobbs, Smith and Forbes Builder: N/A Owners: WS 201 Asset Other: The West Australian Skateboarding Association; Woolstores Forever

Skateboard Ledge, Cantonment Street is located along the eastern facade of the former Elders Wool Store building on Cantonment Street, Fremantle, known locally as the Woolstores or Woolies. The traditional name for Fremantle is Walyalup, which lies within Whadjuk Noongar Boodja.

P00852 *Elders Wool Stores, 38 Cantonment Street* (RHP) comprises part of a complex of multistorey brick buildings bound by Cantonment Street, Elder Place, Goldsbrough Street and Parry Street. The complex was constructed in three stages in 1927, 1950 – 1956 and 1969 – 1970 for the purpose of wool storage and processing. The place was entered to the State Register of Heritage Places in 2004.[3]

The Wool Stores were used for wool storage and processing until the early 1980s. In the late 1990s, the 1967 building on the most northern portion of the site was demolished, and two multi storey buildings for office and residential use were constructed on the corner bound by Elder Place, Cantonment Street and Parry Street. The 1927 portion of *Elders Wool Stores, 38 Cantonment Street* was retained.[4]

Following the 1980s closure of the Wool Stores, several developments were considered for the site during the 1980s and 1990s, including demolition. The importance of the Wool Stores in Fremantle's identity as a port town was clearly demonstrated in community and council discussions and commentary.[5] During this period, local skateboarders and others began to congregate at the vacant site, utilising the ledge along the Cantonment Street for skateboarding, and the building for graffiti, street art and street (music and event) posters. 'Woolies' has since become a key landmark in the Perth and Western Australian skateboarding community. It is the backdrop and feature of many stunts and tricks shared in skate videos, press and other media at the local, national and international stage.[6]

Development of Skateboarding in Western Australia

Skateboarding was adopted relatively late as an activity in Western Australia (late 1970s), following its development in the USA two decades earlier. The following provides a brief outline of its development and subsequent rise in popularity in WA:

> The origin of Skateboarding can be traced back to the 1950s in the USA, where it was developed as an alternative activity for times when the surf was poor. Surfers attached clay wheels to wooden boards and rode them down streets, slopes and embankments to emulate surf conditions. These new 'skateboards' enable them to make the same types of moves and turns on concrete that they would on the water.[7]

---

3 *Elders Wool Stores, 38 Cantonment Street* - Register Entry and Assessment Documentation.

4 The former titles for the complex were amalgamated and in January 2001 these were subdivided to form Lot 201, retaining the 1927 warehouse (*Elders Wool Stores, 38 Cantonment Street*), and Lot 202 to the north.

5 *Elders Wool Stores, 38 Cantonment Street* - Register Entry and Assessment Documentation.

6 West Australian Skateboarding Association, 2025, Woolstores Forever – FAQs, Source: Significance — West Australian Skateboarding Association

7 Skateboardingmagazine.com, '"The Evolution of Skateboarding - A History from Sidewalk Surfing to Superstardom', sourced from http://www.skateboardingmagazine.com/the-evolution-of-skateboarding-a-history-from-sidewalk-surfing-to-superstardom/ Accessed on 4 May 2015. About Sports, 'A Brief History of Skateboarding', sourced from http://skateboard.about.com/cs/boardscience/a/brief_history.htm Accessed on 4 May 2015. 'Tic Tac 2 Heelflip: Australia's skateboarding history [videorecording', Mike Hill, Director, Stephen

> Although the popularity of the new sport grew in the early 1960s, by the mid-1960s it had all but faded. At the time it was considered an extremely dangerous activity, and the boards were hard to control.[8] This all changed in the early 1970s, following the invention of polyurethane wheels in 1972. These new plastic wheels were faster, increased traction, allowed for greater creativity and enabled a whole new set of moves to be employed.[9] As a consequence, skateboarding rapidly became a worldwide phenomenon and skateboard manufacturers were eager to promote the sport.[10] Popular skateboarders were sponsored by big brands such as Coca-Cola and Levis, and travelled the globe demonstrating the capabilities of the skateboard. Slalom and freestyle (acrobatics/ tricks on a flat surface) were the first styles of skateboarding to be adopted,[11] and competitions allowed the world's elite skateboarders to showcase their skills to the masses.
>
> In Australia, skateboarding became popular in the early 1970s simultaneously with the USA. Sharing a similar surfing culture, its surfing youth were also seeking a new pastime for when the surf was not good.[12]
>
> … Australia's first purpose-built skate park was constructed in January 1976 in Western Australia's southern town of Albany. This skate park, now known as Albany Snake Run Skateboard Park, is thought to be the second oldest surviving skate park in the world.[13]
>
> …In the early 1980s, ramps and bowls became the more common and favoured type of skate park. These designs allowed more difficult tricks to be performed, as well as series of tricks to be executed…In the 2000s, three new skate parks were built in Albany… modern facilities aimed at the more experienced skater. Sandford Road included tight configurations of bowls and quarter pipes and Mill Park included banks, grind rails and a grind box. Both Sandford and Mill Park were constructed in response to the increased number of skaters skating along roads and in car parks. Both parks were designed to replicate the 'street style' of skateboarding that was popular, and that Albany Snake Run Skateboard Park was unable to provide.[14]

The development of skateboarding as a sport has not followed the same trajectory as most other sports. There is a competitive element, and competitions at local, State, National and international levels are held, with skateboarding making its debut appearance at the 2020 Summer Olympics in Tokyo, Japan. Grass-roots training and encouragement for young skateboarders is also undertaken by groups and there is representation by the West Australian Skateboarding Association amongst other groups in Western Australia. However, in other ways, skateboarding is unique as a solo or group activity that seeks out different spaces to develop skills and explore opportunities created by landscape elements – sometimes in conflict with the original intent of buildings and structures. Although skate

---

Hill, Producer (Australia, White House Productions: 2001); as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

8 About Sports, 'A Brief History of Skateboarding', sourced from http://skateboard.about.com/cs/boardscience/a/brief_history.htm Accessed on 4 May 2015 ; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

9 Skateboardingmagazine.com, 'The Evolution of Skateboarding – A History from Sidewalk Surfing to Superstardom', sourced from http://www.skateboardingmagazine.com/the-evolution-of-skateboarding-ahistory-from-sidewalk-surfing-to-superstardom/ Accessed on 4 May 2015. Public Skatepark Development Guide, 'Brief History of Skateparks', sourced from http://publicskateparkguide.org/vision/brief-history-of-skateparks/ Accessed on 4 May 2015. 'Tic Tac 2 Heelflip: Australia's skateboarding history [videorecording]', Mike Hill, Director, Stephen Hill, Producer (Australia, White House Productions: 2001); as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

10 'Russ Howell Skateboards, Biography', sourced from http://www.skatewhat.com/russhowell/WebPageBiography.html Accessed on 8 July 2015; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

11 'A Little Skateboard History', sourced from http://skatopia.org/2015/03/a-little-skateboard-history/ Accessed on 8 July 2015; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

12 P1972 *Albany Snake Run Skate Park* Assessment Documentation.

13 Snyder, Craig B., A Secret History of the Ollie Volume 1: 1970s (Black Salt Press, Florida United States: 2015), p. 77; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

14 SK8 & BMX Zone' City of Albany. Sourced from http://albany.wa.gov.au/your-community/youthservices/sk8-bmx-zone/ Accessed on 16 July 2015. Phone conversation between Tammy Flett, City of Albany and Sian Ferraz, State Heritage Office on 16 July 2015; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

parks, including the Albany Skate Park and other more recent examples, are designed with the intent to provide spaces to encourage skating, these do not reflect the entirety of locations utilised by skaters.

The West Australian Skateboarding Association notes that the 'street skateboarding' that occurs at *Skateboard Ledge, Cantonment Street, Fremantle* differs from the way designated skateparks are used.

> Skateboarders look at otherwise innocuous objects in the urban environment to interact and document themselves skateboarding in new creative ways. As this progressed, the emphasis on documentation through photos and film became the backbone of the scene. Skateboarding has steadily grown to a thriving multi-billion dollar industry, as skate film and photography creates excellent opportunities for brands to organically market themselves through clothing, shoes, and other equipment worn in videos and photos.
>
> Skateparks and competitions developed in parallel with this but by no means define what skateboarding is. It may surprise a layperson that, more often than not, a well paid professional skateboarder will seldom participate in high level competition, rather making their fortune and fame through being videoed and photographed while traveling the world to find and skate various creative street spots.[15]

Skateboard Ledge, Cantonment Street, Fremantle

In 2024, the proposed redevelopment of the Wool Stores building by developers Human Urban led to the formation of the Woolstores Forever group. The group of local skateboarders seeking to promote and retain the Woolstores, have advocated strongly for the retention of the ledge within the proposed development.

The West Australian Skateboarding Association suggests that:

> Woolstores is the most important street skateboarding spot in Western Australia. It has been used by skaters since the mid 1980's and is one of the longest standing and most consistently occupied skate spots in all of Australia.
>
> It has been an important gathering point for the youth of Western Australia for close to forty years and has contributed to the lives of thousands. Skaters, artists, musicians, writers, photographers and film makers have all come from this place, with international visitors making the journey to the most isolated city in the world, most of the time only to visit and skate at Woolstores. The ledge at Woolstores is a place of social, economic, cultural and creative diversity that has fostered a community that values these differences and welcomes anyone interested. Through the 2000's Woolstores became an internationally recognised skate spot and a must visit destination for skate teams from all over the world.[16]

The West Australian Skateboarding Association have sourced skateboarding magazine and media promoting Fremantle Woolstores, or 'Woolies' as one of the 'top ten recognized skate spots in the world' from the early 2000s.[17] The industrial aesthetic including the graffiti, and street posters adorning the exterior along the Cantonment façade, is regularly utilised in skating footage and photography to promote professional and amateur skaters, as well as skating brand clothing, equipment and accessories. The location is also valued as a photographic backdrop for weddings and commercial photography.[18]

---

15 West Australian Skateboarding Association, 2025, Woolstores Forever – FAQs, Source: Significance — West Australian Skateboarding Association, Accessed May 2025

16 Information about the place provided by The West Australian Skateboarding Association, May 2025.

17 Staple Magazine #5 2010, Source: West Australian Skateboarding Association, 2025, Woolstores Forever – FAQs, Source: Woolstores Media — West Australian Skateboarding Association, Accessed May 2025

18 West Australian Skateboarding Association, 2025, Woolstores Forever – FAQs, Source: Significance — West Australian Skateboarding Association, Accessed May 2025

COMPARATIVE INFORMATION/THEMATIC ANALYSIS

Thematic Analysis

There is one thematic history relevant to the consideration of this place:

- Thematic History of Western Australia[19] (WA Thematic)

Analysis:

Recreational activities and sports are addressed in the theme *Cultural Life - Recreation Organised Leisure/Entertainment – Sport* in the WA Thematic. However, skateboarding as a recreational activity is not reflected in this theme in the WA Thematic. Instead, during the key periods in the development of skateboarding as a recreational activity internationally and in Western Australia, the WA Thematic focuses on organised sports, and the foundation of organised clubs, competitions and the development of Western Australian athletes in amateur and professional sport as demonstrated by the following key events and phases:

1940s/1950s	WA participates in more national sporting leagues, including surf life saving (1945), Sheffield Shield cricket (1947, full membership 1956), softball (1952) and squash (1952). State identity and pride entwined with sporting prowess. Shirley Strickland (de la Hunty) emerges as internationally successful athlete, winning Olympic medals in 1948, 1952 and 1956. Variety of sports expands, especially influenced by post-war migrants. Soccer, gymnastics, martial arts, water polo, rugby league, polocrosse, softball, disabled sports, clay target shooting, surf life saving, and yachting all either establish leagues or expand considerably. Fibreglass boards (1956) enable surfing to gain popularity.
1962	Perth hosts British Empire & Commonwealth Games, the first to include disabled sports. Brings world attention, boosts tourism, and results in world-class sporting facilities for swimming, basketball, athletics and cycling.
1960s/1970s	Mining boom expands sporting clubs in the Pilbara; Children's sporting competitions increase; Elite netball reaches its peaks, including hosting world championships; WA dominates national league
1970s	Sponsorship, often linked to television promotion, allows professional sporting career opportunities, for the first time allowing many athletes to give up their 'day jobs'. Backyard swimming pools proliferate in Metropolitan area; Recreational jogging and aerobic fitness classes become popular

The values and themes associated with the use of *Elders Wool Stores, 38 Cantonment Street* as a former wool store has been captured in the Register Entry and Assessment Documentation for the place and are not associated with the later opportunistic use of the site for skateboarding.

[19] 'A Thematic History of Western Australia' (incl. Framework Spreadsheet & Narratives). Prepared for the Heritage Council of WA by Clare Menck, Historian, June 2018.

Comparative Analysis

Skateboarding Locations/Facilities in WA

There are two skateboarding locations/facilities in Western Australia in the Historic Heritage Database:

- P1972 *Albany Snake Run Skateboard Park* (RHP) – entered in the State Register of Heritage Places in 2015, the place is the oldest skate park in Western Australia/ Australia and is important to the skating community of Western Australia.
- P18005 Cullity Timbers (fmr), Leederville (Does not meet conditions for RHP, 2023) - a skateboard park was constructed when redeveloped as a community youth centre. The youth hub, in operation since 2002, was a social and creative space for young people, and featured a skate park and colourful murals.

A further place in the database operated as a skateboard venue in the 1980s but has since been converted into offices space/residences:

- P22568 Commercial Building, 31 Pakenham Street, Fremantle (RHP as part of P25225 *West End, Fremantle*) – operated for a short time in the 1980s as The Edge, skateboarding and music venue.

There are numerous skateparks located across Western Australia, none of which have been recognised on local heritage lists. Furthermore, there are many locations or types of locations across the state where street skating was popular, particularly on weekends, such as underground and multi-level car parks, schools, and other locations with concrete ledges or expanses which provided appropriate surfaces and spaces for performing tricks and manoeuvres suited to each location. However, as some street skateboarders utilising the natural 'spots' and locations for skating choose to skate in opposition to security or safety concerns, or owner support, it is difficult to confidently determine if any other similar locations to the *Skateboard Ledge, Cantonment Street* exist in other metropolitan or regional areas in Western Australia.

International Skateboarding Facilities

At the time of Albany Snake Run being entered on the State Register only two other heritage listed skate parks were identified in the USA and Europe, both of which also reflect the snake run style which has since fallen out of fashion:

- Bro Bowl, Florida, USA (1978)[20]
- The Rom, London, England (1978)[21]

Conclusions

Although it is difficult to confidently determine the number of extant comparable places on the information available, the above would suggest that *Skateboard Ledge, Cantonment Street, Fremantle* may be a rare example for its length of use as a popular street skateboarding spot.

OTHER COMMENTS
Nil

[20] USA's National Register of Historic Places - 2013. 'Bro Bowl: Historic 1970s skatepark & Tampa Landmark', sourced from http://www.brobowl.org/about/history/ Accessed on 4 May 2015; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

[21] Grade II heritage listed in 2014, it is the first and only heritage listed skate park in Europe. The Guardian, 'The Rom, Hornchurch, becomes first skatepark in Europe to get heritage status', sourced from http://www.theguardian.com/culture/2014/oct/29/the-rom-hornchurch-first-skatepark-europe-listedstatus Accessed on 4 May 2015; as cited in P1972 *Albany Snake Run Skate Park* Assessment Documentation.

Report Created: May 2025 **Report Amended:**

Heritage Council Decision: 30 May 2025

PART D – OTHER BUSINESS

1. State Administrative Tribunal Applications and Supreme Court Appeals

2. Meeting Closure