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Australian
Planning
Commission

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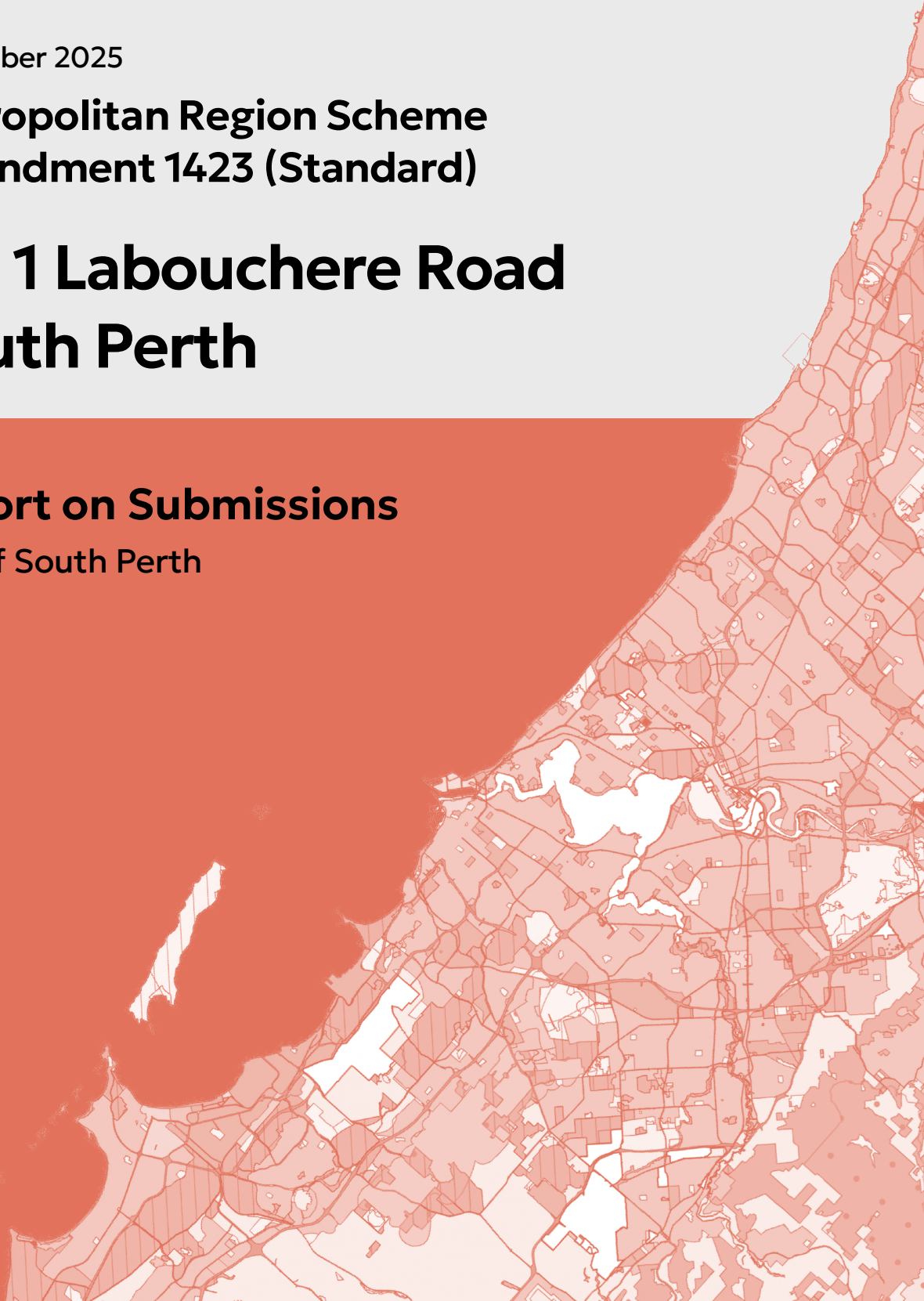
November 2025

Metropolitan Region Scheme Amendment 1423 (Standard)

Lot 1 Labouchere Road South Perth

Report on Submissions

City of South Perth



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Report on Submissions

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Acknowledgement of Country

The Western Australian Planning Commission acknowledges Aboriginal people as the traditional custodians of Western Australia. We pay our respects to the Ancestors and Elders, both past and present, and the ongoing connection between people, land, waters, and community. We acknowledge those who continue to share knowledge, their traditions and culture to support our journey for reconciliation. In particular, we recognise land and cultural heritage as places that hold great significance for Aboriginal people.

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Amendment 1423 (Standard)
Report on Submissions

File: RLS/0864

Published November 2025

This document is available in alternative formats on application to the
Department of Planning, Lands and Heritage Communications Branch.

1. Introduction

At its February 2024 meeting, the Western Australian Planning Commission (WAPC) resolved to proceed with this amendment to the Metropolitan Region Scheme (MRS), in accordance with the provisions of section 35 of the *Planning and Development Act 2005* and regulation 5 of the Planning and Development (Region Planning Schemes) Regulations 2023.

2. The proposed amendment

The amendment proposal was described in the previously published **Amendment Report**, and a description of the proposal is repeated below.

The proposed amendment seeks to transfer approximately 3,750 square metres in South Perth from the Regional Open Space - restricted public access reservation to the Urban zone in Metropolitan Region Scheme (MRS).

The proposed Urban zoning will facilitate the investigation of potential redevelopment opportunities which would be compatible with the current use of the site, and any subsequent planning and development for the site.

3. Environmental Protection Authority advice

On 01 May 2024, the Environmental Protection Authority (EPA) determined that the amendment did not require assessment under Part IV of the *Environmental Protection Act 1986*.

A copy of the notice from the EPA is in Appendix A of the **Amendment Report**.

4. Call for submissions

The amendment was advertised for public submissions for a total of 42 days from 20 May to 01 July 2024.

The amendment was made available for public inspection online at the Department of Planning, Lands and Heritage website.

During the public inspection period, a notice of the amendment was published in *The West Australian* newspaper, and the WAPC made reasonable attempts to notify and invite affected landowners, local government/s and other public authorities to comment on the amendment.

5. Submissions

Nineteen submissions were received on the amendment; six submissions were of objection, eleven were of general comments, non-objection or no comment and two supporting submissions were received.

Copies of all written submissions are contained within this report.

6. Main issues raised in submissions

The main issues of concern raised in submissions are as follows:

- Use and development of the site beyond recreational uses is not appropriate.
- Inconsistency with the recently gazetted local planning framework.
- Insufficient infrastructure to support redevelopment of the site.

WAPC Comment: The proposed Urban zoning aligns the MRS with the existing use and development of the amendment area, which is consistent with urban development. Future changes to the use and development on the site will be controlled by the City of South Perth Local Planning Scheme No. 7 (LPS 7). It is noted that due to the site currently being reserved under the MRS, there is not an existing LPS zoning over the area. Should the proposed amendment be approved, a subsequent amendment to zone the land under LPS 7 will be required in accordance with section 124 of the *Planning and Development Act 2005*.

Given its location relative to the South Perth Activity Centre Plan area, the amendment area is located in an area of high amenity, is connected to service infrastructure, and is accessible via pedestrian, cycle, and public transport infrastructure. Therefore, the proposed amendment will facilitate the efficient use of land in an existing urban area with a high degree of amenity.

In accordance with standard practice, subsequent planning and development stages will have regard to the relevant planning considerations to determine future use and development on the site. This also includes a separate public consultation process. Relevant planning considerations include the local planning framework, the context of the local area and the capacity of the surrounding infrastructure.

The submissions are noted but no change to the amendment is proposed.

7. Responses and determinations

The responses to all submissions are detailed in Schedule 2. It is recommended the amendment be adopted for finalisation as advertised.

8. Coordination of local and region planning schemes

Under section 126(3) of the *Planning and Development Act 2005* (the Act), the WAPC has the option of concurrently rezoning land being zoned Urban under the Metropolitan Region Scheme, to a zone which is consistent with the objective of the Urban zone in the corresponding local planning scheme.

In this regard, the City and proponent have indicated support for the area to be concurrently zoned 'Private Community Purposes' in the City of South Perth Local Planning Scheme No. 7 (LPS 7), albeit the proponent considers it to be an interim zoning. The proponent's preference is for the site to be zoned 'Centre' or 'Special Use' under LPS 7.

Where the WAPC automatically amends a local planning scheme under section 126(3), the relevant area will usually be zoned 'Urban Development', or equivalent, for planning and development to proceed in accordance with a structure plan prepared under the LPS. Structure plans coordinate infrastructure and development and, amongst other matters, outline the zones and development requirements applicable to an area. Where a structure plan is required, not having to undertake a scheme amendment, allows the focus of consultation to be on the structure plan itself. It is generally not appropriate to concurrently zone an area, in the absence of a subsequent structure planning process, as it introduces a change to land use and development potential without consideration through a public consultation process.

The only zone under LPS 7 which facilitates structure planning is the 'Centre' zone. The amendment area is not designated as a Centre under the City's Local Planning Strategy. It is also noted that a request to include this land in the Centre zone for the nearby South Perth Activity Centre Plan (2021) was previously

not supported by the WAPC. Accordingly, it is unlikely a future consultation process will be provided through a structure planning process for the area.

As such, it is not suitable to concurrently zone the amendment area under section 126(3).

Determining the LPS zoning of the amendment area through a separate LPS amendment process will ensure the zoning and associated land uses are considered through a consultation process and will provide an opportunity for refinement as needed.

9. Conclusion and recommendation

This report summarises the background to Amendment 1423 and examines the various submissions made on it.

The Western Australian Planning Commission (WAPC), after considering the submissions, is satisfied that the amendment as shown generally on the **Amendment Figure - Proposal 1** in Schedule 3, and in detail on the Amending Plan listed in Appendix A should be approved and finalised.

Having regard to the above, the WAPC recommends that the Minister for Planning and Lands approves the amendment.

10. Minister decision

Amendments to the Metropolitan Region Scheme being progressed as a standard amendment in accordance with the *Planning and Development Act 2005* and regulation 5 of the Planning and Development (Region Planning Schemes) Regulations 2023 require the WAPC to provide a report and recommendation to the Minister for Planning and Lands for approval. The Minister may approve, approve with modification, or decline to approve the proposed amendment.

The Minister, after considering the amendment, has agreed with the recommendation of the WAPC and approved the amendment.

Amendment 1423 is now finalised as advertised and shown on Amending Plan 3.2831 and has effect in the Metropolitan Region Scheme from the date of notice in the *Government Gazette* on Friday 12 December 2025.

Schedule 1

listing of submissions

Metropolitan Region Scheme Amendment 1423 (Standard)

Lot 1 Labouchere Road, South Perth

Submission Number	Submitter
1	Department of Water and Environmental Regulation
2	Department of Biodiversity, Conservation and Attractions
3	Department of Energy, Mines, Industry Regulation and Safety
4	City of South Perth
5	Department of Transport
6	Water Corporation
7	Public Transport Authority
8	Main Roads Western Australia
9	Department of Health
10	Department of Fire and Emergency Services
11	Department of Education
12	Garry Wilson
13	Name removed at the request of the submitter
14	Matthew Andrews
15	Name removed at the request of the submitter
16	Name removed at the request of the submitter
17	Royal Perth Golf Club
18	Bronwyn David
19	Name removed at the request of the submitter

Schedule 2

summary of submissions and determinations

Submission: 1, 2, 3, 5, 7, 8, 9, 10 & 11

Submitter: Department of Water and Environmental Regulation, Department of Biodiversity, Conservation and Attractions, Department of Energy, Mines, Industry Regulation and Safety, Department of Transport, Public Transport Authority, Main Roads WA, Department of Health, Department of Fire and Emergency Services & Department of Education.

Summary of Submission: COMMENT

The above State Government agencies and infrastructure providers raise no objections, no comment or provide general comments on the amendment.

Planning Comment: Comments noted.

Determination: Submissions noted.

Submission: 4

Submitter: City of South Perth

Summary of Submission: COMMENT

The City supports the amendment subject to the WAPC concurrently zoning the land 'Private Community Purposes' under Local Planning Scheme No. 7 (LPS 7), pursuant to section 126(3) of the *Planning and Development Act 2005*. The City does not support the amendment in the absence of a concurrent amendment or a concurrent amendment to zone the site 'Centre' under LPS 7.

The City supports the amendment subject to the WAPC concurrently zoning the land 'Private Community Purposes' under Local Planning Scheme No. 7 (LPS 7), pursuant to section 126(3) of the *Planning and Development Act 2005*. The City does not support the amendment in the absence of a concurrent amendment or a concurrent amendment to zone the site 'Centre' under LPS 7.

The City advises that it is supportive of future redevelopment of the subject site at an appropriate scale and with appropriate land uses. The City considers the site aligns with the zone objectives, land use permissibility's and development requirements of the Private Community Purposes zone under LPS 7.

The City of South Perth Local Planning Strategy (the Strategy) does not identify the site as a Managed Growth Area to address the infill targets anticipated by the Central Sub-regional Planning Framework. As such, the City considers zoning the site Centre under LPS 7 would be a departure from the Strategy as it would facilitate intensification of use beyond private recreation purposes complementary to the golf course.

The City notes that while this corridor is served by public transport, it is not to the same extent as more prominent corridors which have been designated as Managed Growth Areas in the Strategy. The City also notes that the proximity of the site to the South Perth Activity Centre (ACP) area is not sufficient justification to zone the site Centre in LPS 7 and the site is separated from the ACP area by Richardson Park.

Planning Comment: In respect of processing a concurrent amendment, refer to 'Part 8' within the ***Report on Submissions***.

The City's comments regarding the Local Planning Strategy are noted. Amendments to local planning schemes are considered with regard to the applicable planning framework, including local planning strategies.

Determination: Submission noted.

Submission: 6

Submitter: Water Corporation

Summary of Submission: COMMENT

Reticulated water and sewerage services are currently available to the subject lot, but only a Water Supply is connected. The proposed changes to the Scheme do not appear to impact on the Water Corporation infrastructure or operations.

Planning Comment: Further clarification has been sought from the Water Corporation regarding the sewerage services available to Lot 1. The Water Corporation has confirmed that the existing development on the site is connected to reticulated sewer.

Determination: Submission noted.

Submission: 12

Submitter: Garry Wilson

Summary of Submission: OBJECTION

The submitter advises that they see no real merit in zoning land reserved for parks and recreation to urban. Maintaining parks in the city should be the highest priority.

Planning Comment: Refer to 'Part 6 - Objecting Comments' within the ***Report on Submissions***. The existing use and development of the subject land is Urban. The transfer of the land to the Urban zone does not reduce the public park land available to the community as the land is privately owned.

Determination: Submission dismissed.

Submission: 13

Submitter: Name removed at the request of the submitter

Summary of Submission: OBJECTION

The submitter advises that an exclusive club shouldn't be making profits above and beyond running costs, from land gifted by the public to them.

Planning Comment: Refer to 'Part 6 - Objecting Comments' within the **Report on Submissions**. The Royal Perth Golf Club historically purchased the land from the Crown. There are no limitations or encumbrances on the Certificate of Title which restrict the use of the land.

Determination: Submission dismissed.

Submission: 14

Submitter: Matthew Andrews

Summary of Submission: SUPPORT

The submitter advises that the amendment of the MRS is logical and reasonable. The site is within proximity to the South Perth Activity Centre that seeks to increase population and commercial activity. This amendment would unlock development potential for the site allowing for the provision of more residential, transient residential, community and commercial uses consistent with the surrounding developments.

Planning Comment: Support noted.

Determination: Submission noted.

Submission: 15

Submitter: Name removed at the request of the submitter

Summary of Submission: OBJECTION

The submitter is of the view that the area does not have the infrastructure to support any more residential development and advise that the current traffic in the area is bad.

Planning Comment: Refer to 'Part 6 - Objecting Comments' within the **Report on Submissions**. Future planning and development proposals relating to the site will be required to address all relevant planning considerations, including infrastructure capacity and traffic impacts on the local area.

Determination: Submission dismissed.

Submission: 16

Submitter: Name removed at the request of the submitter

Summary of Submission: OBJECTION

The submitter advises that they do not consider it is appropriate for land to be zoned and allow the Royal Perth Golf Club to profit, over and above their current activities, from land that was gifted by the public to them. Amendments that have greater public benefit should be considered.

Planning Comment: Refer to 'Part 6 - Objecting Comments' within the **Report on Submissions**. The Royal Perth Golf Club historically purchased the land from the Crown. There are no limitations or encumbrances on the Certificate of Title which restrict the use of the land. The proposed Urban zoning appropriately reflects the use of the land in the MRS. Future use and development of the land will be controlled by the local planning scheme.

Determination: Submission dismissed.

Submission: 17

Submitter: Taylor Burrell Barnett (on behalf of Royal Perth Gold Club)

Summary of Submission: SUPPORT

The submitter advises that the Royal Perth Golf Club (RPGC) is the registered proprietor of Lot 1 Labouchere Road, South Perth (amendment area). The MRS Amendment has no impact on the adjoining Crown Reserve 10250 (purpose: public recreation) which is vested to the City of South Perth with power to lease for any term not exceeding 50 years. The City has leased the land to the Royal Perth Golf Club Inc, approximately 33 years remain on the lease.

The submitter advises that the existing Parks and Recreation - restricted public access MRS reserve classification is an impediment to the RPGC's ability to investigate opportunities to develop or redevelop its freehold land. Zoning the land 'Urban' will enable the RPGC to investigate ways to diversify their club operations and remain sustainable commensurate with their lease arrangements to run the adjacent golf course.

Golf clubs can become more integrated with their communities by expanding into other complementary services such as: dining and bar experiences; function centre; short-stay accommodation; leisure facilities; health, gym, and lifestyle club facilities; golf academies; and lifestyle choices such as over 55's dwellings, and/or vertical retirement villages. All of these endeavours would be consistent and suitable for a golf course located in proximity to a capital city with a planning framework encouraging consolidated urban infill.

The amendment is consistent with the approach of applying the Urban zone over the Joondalup Golf and Country Club, The Links Kennedy Bay clubhouse, Hamersley Public Golf Course, Dawesville Cut clubhouse, Mandurah Country Club, Secret Harbour Golf Links, and the Meadow Springs clubhouse. The proposed Urban zone fits comfortably into the state and regional framework as the land is located on an urban corridor, immediately abutting the boundary of the South Perth Activity Centre.

The RPGC is supportive of the City's position that the land be concurrently zoned Private Community Purposes under the City of South Perth Local Planning Scheme No. 7. This notwithstanding, the RPGC's preference is for the land to be zoned Centre or Special Use to better align with its intent to pursue other opportunities too.

While the RPGC does not have an agreed redevelopment vision in place, it envisages redevelopment of the freehold lot going beyond the purpose of the Private Community Purpose zone. It is considered that future investigations may determine that an Additional Use or an alternative zone are appropriate to realise a future development vision. In the interim the Private Community Purposes zone will provide for the continued operations of the existing development and as such is not considered to be an impediment.

Planning Comment:

While the urban zone applies fully or partly to the golf courses listed by the submitter, it is noted that there has not been a consistent approach to the zoning of golf courses under the region planning schemes. Across the MRS area, a combination of Parks and Recreation - restricted public access reservation, Parks and Recreation reservation, Urban zoning and Private Recreation zoning have been applied. The inconsistencies are generally associated with land tenure.

In respect of progressing a concurrent amendment, refer to 'Part 8' within the **Report on Submissions**.

Determination:

Submission noted.

Submission:

18

Submitter:

Bronwyn David

Summary of Submission:

OBJECTION

The submitter observes that the City of South Perth has very recently undertaken a review of its Local Planning Scheme. The City's contribution to housing by way of the rezoning of areas to support higher density housing has been finalised. The rezoning of this area was not examined during this very public process.

The submitter is of the view that approval of the proposed amendment would be incongruous with the surrounding recreational areas and intensification of development will put further pressure on the already congested local roads.

The submitter is not supportive of the Royal Perth Gold Club as a private company, making a profit from land which they obtained as 'recreational' land. Other sporting associations are crying out for land and facilities in the area. If a trade-off of a parcel of land from the golf course, gifted by the gold club, in return for rezoning could be devised it would reflect very well on all concerned.

Planning Comment:

Refer to 'Part 6 - Objecting Comments' within the ***Report on Submissions***. It is noted that due to the site currently being reserved under the MRS, there is not an existing LPS zoning over the area. Future development on the site will be subject to subsequent planning stages to determine the land uses and development which may be appropriate on the site. This will include zoning the land under LPS 7 through a local planning scheme amendment. An amendment to the local planning scheme will be required to have regard to the relevant planning considerations and include a public consultation process.

The Royal Perth Golf Club historically purchased the land from the Crown. There are no limitations or encumbrances on the Certificate of Title which restrict the use of the land. The proposed amendment recognises that the land use and ownership of the site is aligned with the MRS Urban zone rather than the current Parks and Recreation - Restricted Public Access reservation. The golf course itself is a Crown land reserve and currently leased to the Royal Perth Golf Club.

Determination:

Submission noted.

Submission:

19

Submitter:

Name removed at the request of the submitter

Summary of Submission:

OBJECTION

The submitter is of the view that the land should remain part of the Parks and Recreation reservation. The submitter considers that zoning the land is ad-hoc, short-sighted, and will create an isolated pocket of land that could restrict use of the surrounding reserve in the future. The demand for public land, for community and recreational purposes, will only intensify given the residential development occurring in the surrounding area. The proposal appears to benefit the landowner's financial interests rather than provide a community benefit.

The submitter considers that zoning the subject land would not be consistent with orderly and proper planning as the City of South Perth Local Planning Scheme No. 7 has recently been gazetted. The submitter considers that the Scheme met residential growth targets without including this land.

Planning Comment:

Refer to 'Part 6 - Objecting Comments' within the ***Report on Submissions***. The proposed zoning recognises the urban use of the land under the MRS. Any future development on the site will be subject to the controls of the local planning scheme. A separate amendment to the local planning scheme is required to determine and establish appropriate land use and

development controls for the area. It is noted that a future amendment to the local planning scheme will be required to include a public consultation process.

Determination:

Submission noted.

Schedule 3

amendment figure/s (as advertised)



**Lot 1 Labouchere Road, South Perth
Proposed Standard MRS amendment
as advertised**

28 February 2024

Proposal 1

Proposed Amendment:

 Regional Open Space - Restricted Public Access reservation to Urban zone

Oracle reference no: 3029

File number: RLS/0864

Version number: 1



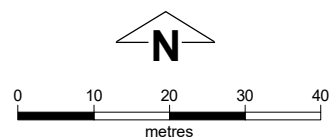
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Commission

Date: 5/11/2025

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Appendix A

list of plans (as advertised)

Metropolitan Region Scheme Amendment 1423 (Standard)

Lot 1 Labouchere Road, South Perth

as advertised

Amending Plan 3.2831

Detail Plans: 1.6343

Appendix B

submissions

From: [Jim Mackintosh](#)
To: [Region Planning Schemes](#)
Cc: [Brett Pye](#)
Subject: RE: Proposed Metropolitan Region Scheme Amendment 1423 (Standard) - Lot 1 Labouchere Road, South Perth - RLS/0864
Date: Tuesday, 21 May 2024 3:12:25 PM
Attachments: [image001.jpg](#)

OFFICIAL

OFFICIAL

OFFICIAL

Dear DPLH,

The Department has considered the proposal and has no objections and no comments.

Regards

Jim Mackintosh

Department of Water and Environmental Regulation

Program Manager

Swan Avon Region

Planning Advice Section

T 08 6250 8043 |

E jim.mackintosh@dwer.wa.gov.au

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From: [Jacqui Clinton](#)
To: [Region Planning Schemes](#)
Cc: [Brett Pye](#)
Subject: RE: Proposed Metropolitan Region Scheme Amendment 1423 (Standard) - Lot 1 Labouchere Road, South Perth - RLS/0864
Date: Wednesday, 22 May 2024 9:37:11 AM
Attachments: [image002.png](#)
[image003.jpg](#)

OFFICIAL

Hi Zoe,

Thank you for the opportunity to comment on this amendment. DBCA have no comments to make on this occasion.

Regards

Jacqui Clinton

Senior Planning Officer

Swan Region

Parks and Wildlife Service

Department of Biodiversity, Conservation and Attractions

Phone: (08) 9442 0312 Mobile: 0439 977 455

Email: jacqui.clinton@dbca.wa.gov.au

** I currently work part-time Monday to Thursday*



Department of Biodiversity,
Conservation and Attractions



*We're working for
Western Australia.*



Department of Energy, Mines,
Industry Regulation and Safety
Resource and Environmental Regulation

Your ref RLS/0864
Our ref DMS0508/2024
Enquiries Steven Batty — 9222 3104
Steven.BATTY@dmirs.wa.gov.au

Brett Pye
Senior Planner | Schemes and Strategies
Department of Planning, Lands and Heritage
Sent by Email — brett.pye@dplh.wa.gov.au
140 William Street, Perth WA 6000

Dear Brett Pye

**MRS - PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1423
(STANDARD) - LOT 1 LABOUCHERE ROAD, SOUTH PERTH - RLS/0864**

Thank you for your letter dated 20 May 2024 inviting comment on the proposed Metropolitan Region Scheme (MRS) Amendment 1423 (Standard) at Lot 1 Labouchere Road, South Perth - RLS/0864.

The Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) has determined that this proposal raises no significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.

DEMIRS lodges no objections to the above MRS amendment.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S. Batty'.

Steven Batty | Senior Geologist
Mineral and Energy Resources Directorate
04 June 2024

Submitted to Metropolitan Region Scheme Amendment 1423 (Standard) - Lot 1 Labouchere Road, South Perth
Submitted on 2024-06-10 16:20:26

Introduction

1 What is your first name?

What is your name?:

Jessica

2 What is your surname?

What is your surname?:

Birbeck

3 What is your address?

What is your address?:

Cnr Sandgate St & South Tce

4 What is your email address?

Email:

jessica.birbeck@southperth.wa.gov.au

5 Contact phone number

Number:

94740836

6 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

7 Are you responding on behalf of an organisation?

Yes

Organisation:

City of South Perth

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

9 Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.

Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.:

Please see attached submission from the City of South Perth.

10 Upload supporting documents

Upload supporting documents:

City of South Perth Comment - MRS Amendment No. 1423 - Lot 1 Labouchere Road.pdf was uploaded

11 Upload supporting documents

Upload supporting documents:

No file uploaded

Enquiries: Jessica Birbeck on 9474 0836 or
Jessica.Birbeck@southperth.wa.gov.au

Our Ref: LA1/L1V8

Your Ref: RLS/0864

10 June 2024

Department of Planning, Lands and Heritage
140 William Street
PERTH WA 6000
Sent via email - regionplanningschemes@dplh.wa.gov.au
Attn: Brett Pye, Senior Planner

Dear Brett,

METROPOLITAN REGION SCHEME AMENDMENT NO. 1423 – LOT 1 LABOUCHERE ROAD – CITY OF SOUTH PERTH SUBMISSION

The City of South Perth (the City) provides the following comments on the Metropolitan Region Scheme (MRS) amendment request proposed for Lot 1 Labouchere Road, South Perth (subject site), which seeks to transfer the subject site from the 'Parks and Recreation – restricted public access' reservation to the 'Urban' zone under the MRS.

The City supports the proposed 'Urban' zone for the subject site under the MRS provided that a concurrent amendment is progressed to apply the 'Private Community Purposes' zone under Local Planning Scheme No. 7 (LPS 7). This would provide certainty for the future development of the site, whilst providing flexibility for land use and built form through applicable provisions under LPS 7, as discussed below.

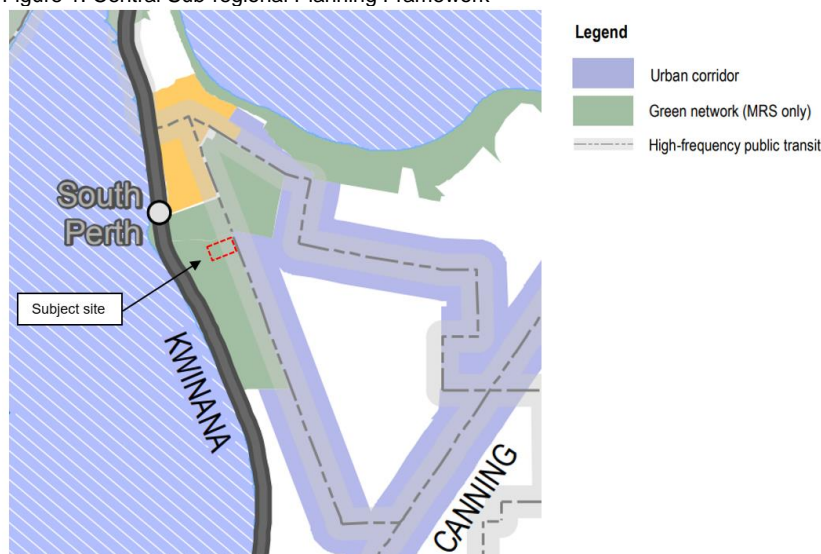
In the absence of a concurrent amendment to the local planning scheme, the City does not support the proposed 'Urban' zone under the MRS. Furthermore, the City does not support a concurrent amendment to apply the 'Centre' zone under LPS 7, which is inconsistent with the State and local planning framework as discussed below.

Planning Framework Assessment

Central Sub-regional Planning Framework

The Amendment Report states the proposed 'Urban' zone for the subject site is broadly consistent with the designation of Labouchere Road as an 'Urban Corridor' under the Central Sub-regional Planning Framework (the Framework), as per Figure 1 below.

Figure 1: Central Sub-regional Planning Framework



The Framework notes that the map is a conceptual representation of broad planning intentions within the sub-region and that further planning processes and decision-making under relevant legislation will need to be undertaken. Further detailed planning has occurred for the subject area, through the preparation of the City's Local Planning Strategy (the Strategy) which was approved by the WAPC in March 2021.

The Strategy notes that a number of urban corridors identified in the Framework do not form part of the 'managed growth strategy' to accommodate future infill development. Labouchere Road is an urban corridor which has not been included. The reasons for excluding the corridor as noted in the Strategy are as follows:

- The areas identified in the managed growth strategy address the dwelling growth expectations of Perth and Peel @3.5million.
- This corridor is served by public transport, but not to the same extent as more prominent corridors such as Canning Highway and Manning Road; and
- The corridor is not identified as 'high-priority' routes in the Perth and Peel Transport Plan. This indicates a presumption against significant investment in upgrading transport infrastructure/services along the corridors in, at least, the short-medium term.

Local Planning Strategy

The Amendment Report states the amendment is *"broadly consistent with the intent of the Local Planning Strategy given the proposed amendment area is located adjacent to the Labouchere Road 'Urban Corridor' as identified in the Framework and in close proximity to the South Perth activity centre area."*

As discussed above, the Strategy does not identify Labouchere Road as an 'Urban Corridor,' nor does it identify the site within a 'Growth area' (as shown by Figure 2 below). The site therefore does not have a role in delivering the City's forecast dwelling growth and was not planned to have a significant increase in intensity of development. The intensification of use at the site beyond private recreation purposes (or other uses complementary to the adjoining golf course) would reflect a departure to the recently adopted strategic planning framework. This would be facilitated by the application of the 'Urban' zone under the MRS (with the absence of a concurrent amendment under the local planning scheme), or with a concurrent amendment to a 'Centre' zone under LPS 7.

It is further noted that 'proximity' to the South Perth activity centre area is insufficient justification to support application of the 'Urban' zone (and more notably the application of the 'Centre' zone under LPS 7). The site is separated to the activity centre area by Richardson Park, a 6ha Parks and Recreation Reserve and is not subject to the requirements of the South Perth ACP. The site is inappropriate to be included in the 'Centre' zone.

Figure 2: Local Planning Strategy extract



For the purposes of clarification, it is noted that the agenda report to the WAPC on 28 February 2024 to initiate the MRS amendment summarised the City's comments in relation to the Local Planning Strategy as: *"any intensification of land uses on this site would represent a departure from the recently adopted planning framework."* These comments do not reflect the City's preliminary comments provided to the Department of Planning, Lands and Heritage (DPLH), which were: *"The intensification of use at the site beyond private recreation purposes complementary to the golf course, would reflect a departure from the recently adopted strategic planning framework."*

In principle, the City is supportive of future redevelopment of the subject site at an appropriate scale and with appropriate land uses.

Concurrent Local Planning Scheme Amendment

The City requests a concurrent amendment is undertaken to the local planning scheme to apply the 'Private Community Purposes' zone to the subject site. The subject site aligns with the Private Community Purposes zone based on the zone objectives, land use permissibility and development requirements under LPS 7, as discussed further below.

Under LPS 7, the Private Community Purpose zone has the following zone objectives:

- *To provide sites for privately owned and operated recreation, institutions and places of worship.*
- *To integrate private recreation areas with public recreation areas wherever possible.*
- *To separate potentially noisy engine sports from incompatible uses.*
- *To provide for a range of privately owned community facilities, and uses that are incidental and ancillary to the provision of those facilities, which are compatible with surrounding development.*
- *To ensure that the standard of development is in keeping with surrounding development and protects the amenity of the area.*

The land use permissibility for the Private Community Purposes zone also provides for a diverse range of uses being considered including but not limited to:

- Educational Establishment 'P'
- Independent Living complex 'D'
- Multiple Dwelling 'A'
- Reception Centre 'P'
- Recreation - Private 'D'
- Restaurant/Café 'A'

The development requirements applicable to all land zoned Private Community Purpose are:

- '(1) *In the absence of an approved local development plan, all non-residential development shall be designed in accordance with the following requirements:*
- (a) *Building height – Maximum 2 storeys*
 - (b) *Primary street setback – Minimum 7.5 metres*
 - (c) *Side Setbacks – Minimum 4.5 metres'*

As above, the development requirements applicable to the zone provide for detailed planning to occur through a Local Development Plan to vary the default provisions. The application of the Private Community Purposes zone would also not preclude the Royal Perth Golf Club seeking an 'additional use' for the site in future (if desired) through a local planning scheme amendment, as redevelopment opportunities are further explored for the land.

Should you require clarification on any the points raised in this letter, please contact Jessica Birbeck, Coordinator Strategic Planning on 9474 0836 or via jessica.birbeck@southperth.wa.gov.au.

Yours sincerely,



FIONA MULLEN
MANAGER DEVELOPMENT SERVICES

From: [Nugraha, Yohan](#)
To: [Region Planning Schemes](#)
Cc: [Brett Pye](#); [Golestani, Shanthi](#)
Subject: RE: PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1423 (STANDARD) - LOT 1 LABOUCHERE ROAD, SOUTH PERTH
Date: Wednesday, 12 June 2024 1:14:48 PM
Attachments: [image001.png](#)

OFFICIAL

Your ref: RLS/0864

Our ref: DT/24/00345

Enquiries: Shanthi Golestani (9216 8774)

Ms Sam Boucher
Secretary
Western Australian Planning Commission
140 William St, Perth WA 6000
By email: regionplanningschemes@dplh.wa.gov.au

Attn: Brett Pye

Dear Ms Boucher

RE: PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1423 (STANDARD) - LOT 1 LABOUCHERE ROAD, SOUTH PERTH

Thank you for your email dated 20 May 2024 inviting the Department of Transport (DoT) to provide comment on the above proposed development. The Urban Mobility (UM) division of DoT has reviewed the submitted documents and supports the proposal in principle.

We understand Main Roads WA and Public Transport Authority will send responses directly.

If you have wish to follow up on any of these matters, please do not hesitate to contact Shanthi Golestani on 9216 8774.

Kind regards,

Yohan Nugraha
Transport Designer / Planner|Urban Mobility|Department of Transport
GPO Box C102, Perth WA 6839
Tel: (08) 65516103
Email: Yohan.Nugraha@transport.wa.gov.au|Web: www.transport.wa.gov.au



From: [WAPCreferrals](#)
To: [Region Planning Schemes](#)
Subject: Public Transport Authority Referral Response - Proposed Metropolitan Region Scheme Amendment 1423 (Standard) - Lot 1 Labouchere Road, South Perth - RLS/0864
Date: Tuesday, 18 June 2024 2:51:54 PM
Attachments: [image002.png](#)
[image003.jpg](#)

OFFICIAL

Dear Brett,

Regarding your email dated 20 May 2024, the Public Transport Authority (PTA) has no objections to the proposed MRS amendment, this site is accessible to public existing public transport services along Labouchere Road, South Perth.

Kind regards,

Rashidah MacLeod

Transport and Land Use Planner | Infrastructure Planning and Land Services

Public Transport Authority of Western Australia

Public Transport Centre, West Parade, Perth, 6000

PO Box 8125, Perth Business Centre, WA, 6849

Tel: (08) 9326 5658 Fax: (08) 9326 2000

Email: WAPCReferrals@pta.wa.gov.au | Web: www.pta.wa.gov.au



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From: [Luke Gabriel](#)
To: [Region Planning Schemes](#)
Cc: [Brett Pye](#)
Subject: RE: MRS364978 Proposed Metropolitan Region Scheme Amendment 1423 (Standard) - Lot 1 Labouchere Road, South Perth - RLS/0864
Date: Monday, 17 June 2024 1:02:35 PM
Attachments: [image001.jpg](#)
[METRO REGION SCHEMEMRS364978, Land Planning Response, WAPC MRS Lot 1 Labouchere Rd South Perth, INITIAL.DOC](#)
[RE Updated preliminary comment request - Proposed MRS Amendment - Lot 1 Labouchere Rd South Perth.msg](#)

OFFICIAL

Hi there,

The Water Corporation has provided advice in 2020 and most recently in December 2023. The previous advice is still valid, I have attached said advice for your convenience.

Warm regards,

Luke.

Luke Gabriel
Snr Plnr – Land Use Planning
Development Services

E Luke.Gabriel@watercorporation.com.au

T (08) 9420 3966



watercorporation.com.au

.....



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From: Land Planning <LandPlanning@watercorporation.com.au>
Sent: Wednesday, 20 December 2023 1:49 PM
To: Brett Pye
Subject: RE: Updated preliminary comment request - Proposed MRS Amendment - Lot 1 Labouchere Rd, South Perth

Brett,

The amendment proposal is minor in nature and the Corporation's comments of 2019/20 are still applicable.

The existing buildings on this lot are currently provided with water and sewerage services off the mains running along Labouchere Rd. Future redevelopment of the site will require building and service applications to be submitted to the Corporation's Building Services for approval. Assuming that the proposed redevelopment is modest, as described in the accompanying TBB report, the redevelopment can be accommodated on the network. Any significant increase in water demand, additional fire services, or increases in sewer flows may necessitate changes to the current servicing arrangement.

The proponents should be advised to make early service feasibility inquiries to the Water Corporation as part of its due diligence and planning for the redevelopment of the site.

Regards

Brett Coombes
Senior Planner, Land Use Planning
Development Services
Tel. 9420-3165

From: Brett Pye <Brett.Pye@dplh.wa.gov.au>
Sent: Tuesday, 19 December 2023 3:12 PM
To: WAPC Referrals <WAPC.Referrals@watercorporation.com.au>; Brett Coombes <Brett.Coombes@watercorporation.com.au>
Cc: Region Planning Schemes <regionplanningschemes@dplh.wa.gov.au>
Subject: Updated preliminary comment request - Proposed MRS Amendment - Lot 1 Labouchere Rd, South Perth

OFFICIAL

Hi Brett,

We are currently in the process of assessing a Metropolitan Region Scheme (MRS) amendment request for Lot 1 Labouchere Road, South, which seeks to transfer this lot from the Parks and Recreation reservation to the Urban zone under the MRS.

As part of this assessment we are seeking updated preliminary comments from the Water Corporation on the proposed amendment request. In this respect, we originally sought preliminary comment from the Water Corporation in January 2020 and it provided its preliminary comments in the attached letter (dd 3 January 2020). Also attached is a copy of the original MRS amendment request.

If possible, can you please arrange for the Water Corporation's updated preliminary comments on this proposed amendment to be provided by Wednesday 31 January. Please feel free to contact me should you require more time to provide updated preliminary comments or wish to discuss this proposal further.

Kind Regards

Brett Pye

Senior Planner | Schemes and Strategies

Department of Planning, Lands and Heritage

140 William Street, Perth WA 6000

wa.gov.au/dplh | 6551 9100



The Department acknowledges the Aboriginal people of Western Australia as the traditional custodians of this land, and we pay our respects to their Elders, past and present.

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Your Ref: 833-2-11-16 (RLS/0862/1)
Our Ref: 57168161 - MRS364978
Enquiries: Ross Crockett
Direct Tel: 9420 2013

3rd January 2019

**Western Australian Planning Commission
LOCKED BAG 2506
PERTH W.A. 6001**

Attention of: **Anthony Muscara**

Re: MRS Amendment - Lot 1 Labouchere Rd, South Perth

Thank you for your letter dated 20th December 2019. We offer the following comments in regard to this proposal.

Water and Wastewater

Reticulated water and sewerage services are currently available to the subject Lot, but only a Water Supply is connected.

However the proposed changes to the Scheme do not appear to impact on the Water Corporation infrastructure or operations.

Please provide the above comments to the land owner, developer and/or their representative.

Should you have any queries or require further clarification on any of the above issues, please do not hesitate to contact the Enquiries Officer.

Ross Crockett
Development Planner
Land Planning
Assets Planning Group



mainroads
WESTERN AUSTRALIA

Enquiries: Harrison Blinman (08) 9323 4668
Our Ref: 20/271 (D24#792725)
Your Ref: RLS/0864

Date 25 Jun. 24

The Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

Email: mrs@dplh.wa.gov.au

Attention: Officer

**PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1423
(STANDARD) - LOT 1 LABOUCHERE ROAD, SOUTH PERTH - RLS/0864**

Thank you for your correspondence dated 20 May 2024 inviting Main Roads to comment on the above proposal.

Main Roads has the following comments to make:

1. Due to the distance of the subject site from a Primary Regional Road, Main Roads has no contributing comments and does not object to the proposed MRS amendment.

Main Roads requests a copy of the WAPC's final recommendation to be sent to planninginfo@mainroads.wa.gov.au quoting the file reference above.

If you require any further information, please contact Harrison Blinman via email at Harrison.Blinman@mainroads.wa.gov.au.

Yours sincerely

Lindsay Broadhurst
Director Road Planning



Government of **Western Australia**
Department of **Health**

Your Ref: RLS/0864
Our Ref: F-AA-90535-25
Contact: John Coles 9222 2000

Mr Brett Pye
Senior Planner
Department of Planning Lands and Heritage
Level 6, 61 Victoria Street
BUNBURY WA 6230

Via email: Brett.Pye@dplh.wa.gov.au

Dear Mr Pye

**PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1423
(STANDARD) - LOT 1 LABOUCHERE ROAD, SOUTH PERTH - RLS/0864**

Thank you for your letter dated 16 May 2024 requesting comment from the Department of Health (DoH) on the above proposal.

The DoH provides the following comment:

In relation to the management of wastewater, the proposed site does appear to have access to reticulated deep sewerage, therefore the DoH has no objection to the proposal subject to connection to reticulated sewage services provided by a licensed service provider.

Should you have any queries or require further information please contact System Performance on 9222 2000 or eh.eSubmissions@health.wa.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M. Lester'.

Mr Matthew Lester
**A/EXECUTIVE DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE**

27 June 2024

From: [DFES Land Use Planning](#)
To: [Region Planning Schemes](#); [DPI Referrals](#)
Cc: [Brett Pye](#)
Subject: RLS/0864 - Lot 1 Labouchere Road, South Perth - Proposed Scheme Amendment 1423
Date: Friday, 28 June 2024 12:11:20 PM
Attachments: [image001.png](#)
[image002.png](#)
[REFERRAL TO DFES CHECKLIST.pdf](#)

DFES Ref: D34927

Dear Sir/Madam,

The Department of Fire & Emergency Services (DFES) provides the following comments pursuant to *State Planning Policy 3.7 Planning in Bushfire Prone Areas* (SPP 3.7) and the *Guidelines for Planning in Bushfire Prone Areas* (Guidelines):-

- i. The proposed scheme amendment does not fall into an area designated as bushfire prone pursuant to the *Fire and Emergency Services Act 1998 (as amended)* as identified on the *Map of Bush Fire Prone Areas*.
- ii. If there is some other reason which has given you cause to consider a referral to DFES, could you please provide detail on the attached 'Referral to DFES Checklist'.

Please call me on 9395 9819 if you have any queries regarding the above.

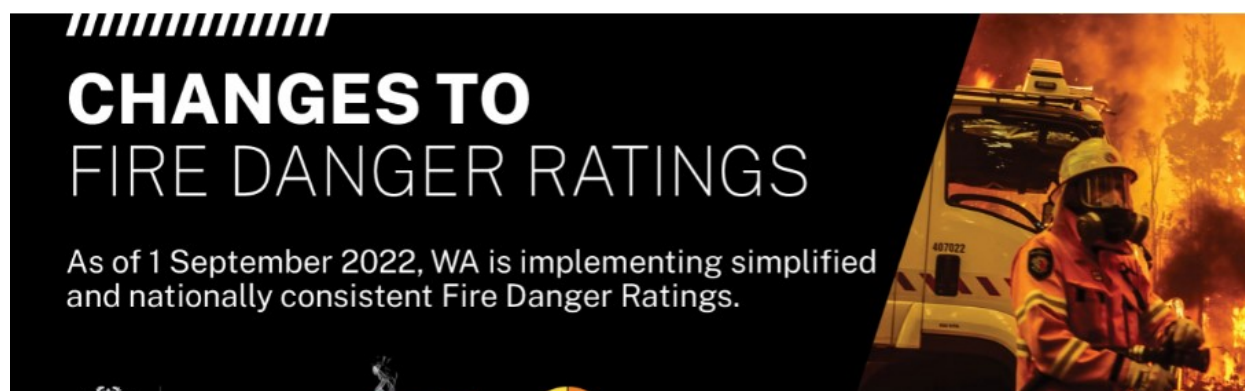
Kind regards

Michael Ball
Senior Land Use Planning Officer

20 Stockton Bend, Cockburn Central, Perth WA 6164
T: 08 9395 9819 | **E:** advice@dfes.wa.gov.au | **W:** dfes.wa.gov.au



FOR A SAFER STATE



Acknowledgement of Country: DFES acknowledges the Traditional Owners of Country throughout Australia, and their connections to land, sea and community. We pay our respects to Elders past and present.

From: [GOULD Joshua \[Strategy and Planning\]](#)
To: [Region Planning Schemes](#)
Cc: [Brett Pye](#); [AHMAD Ikmal \[Asset Planning and Services\]](#)
Subject: RE: Proposed Metropolitan Region Scheme Amendment 1423 (Standard) - Lot 1 Labouchere Road, South Perth - RLS/0864
Date: Friday, 28 June 2024 12:19:49 PM
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.jpg](#)

OFFICIAL

Hi Zoë,

Thank you for your email providing the Department the opportunity to review the abovementioned proposal.

The Department has no in principle objections to the proposal. Any requirement for primary school developer contributions will be assessed and applied at the subdivision stage.

Please let me know if you need any further information.

Kind regards,

Joshua Gould

Senior Consultant – Land and Planning
Infrastructure Strategy and Planning

Department of Education
151 Royal Street, East Perth WA 6004
T +61 (08) 9264 4008 E joshua.gould@education.wa.edu.au
education.wa.edu.au



Shaping the future

For land planning referrals and queries, please email to landplanning@education.wa.edu.au

For subdivision referrals and queries, please email to subdivisionreferrals@education.wa.edu.au

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From: [WILSON, Garry](#)
To: [Region Planning Schemes](#)
Subject: Scheme Amendment 1423
Date: Friday, 28 June 2024 11:36:54 AM

Please provide your feedback

I have reviewed Scheme Amendment 1423 and I can see no real merit in rezoning park and recreation land for urban use. Parks in the City shall be maintained as the highest priority. I object to Scheme Amendment 1423.

Regards,

Garry Wilson

https://haveyoursay.dplh.wa.gov.au/mrslabouchereroad/survey_tools/please-provide-your-feedback

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Respondent No: 1

Login: Anonymous

Email: n/a

Responded At: Jun 28, 2024 13:06:23 pm

Last Seen: Jun 28, 2024 13:06:23 pm

IP Address: n/a

Details removed at the request of the submitter

Q1. What is your name?

Q2. What is your surname?

Q3. What is your email address?

Q4. What is your address?

Q5. What is your contact number?

Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

Q7. Are you responding on behalf of an organisation?

No

Q8. What is the name of the organisation?

not answered

Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.

An exclusive club shouldn't be making profits above and beyond running costs, from land gifted by the public to them.

Q11. Upload supporting documents

not answered

Q12. Upload supporting documents

not answered

**Respondent No:** 2**Login:** Anonymous**Email:** n/a**Responded At:** Jun 28, 2024 13:30:08 pm**Last Seen:** Jun 28, 2024 13:30:08 pm**IP Address:** n/a

Q1. What is your name?	Matthew
Q2. What is your surname?	Andrews
Q3. What is your email address?	fandrews@live.com.au
Q4. What is your address?	1/77 King George Street, Victoria Park
Q5. What is your contact number?	0422649652
Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?	No
Q7. Are you responding on behalf of an organisation?	No
Q8. What is the name of the organisation?	not answered
Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?	Support
Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.	
<p>The amendment of the MRS is logical and reasonable. Additionally, the site is within close proximity to the South Perth Activity Centre that seeks to increase population and commercial activity. This amendment would unlock development potential for the site allowing for the provision of more residential, transient residential, community and commercial uses consistent with the surrounding developments.</p>	
Q11. Upload supporting documents	not answered
Q12. Upload supporting documents	not answered



Respondent No: 3

Login: Anonymous

Email: n/a

Responded At: Jun 28, 2024 15:23:31 pm

Last Seen: Jun 28, 2024 15:23:31 pm

IP Address: n/a

Q1. What is your name?

Details removed at the request of the submitter

Q2. What is your surname?

Q3. What is your email address?

Q4. What is your address?

Q5. What is your contact number?

Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

Q7. Are you responding on behalf of an organisation?

No

Q8. What is the name of the organisation?

not answered

Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.

The area does not have the infrastructure to support any more residential development. The current traffic in the area is bad enough without adding to it any further.

Q11. Upload supporting documents

not answered

Q12. Upload supporting documents

not answered



Respondent No: 4

Login: Anonymous

Email: n/a

Responded At: Jun 28, 2024 17:40:53 pm

Last Seen: Jun 28, 2024 17:40:53 pm

IP Address: n/a

Q1. What is your name?

Details removed at the request of the submitter

Q2. What is your surname?

Q3. What is your email address?

Q4. What is your address?

Q5. What is your contact number?

Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

Q7. Are you responding on behalf of an organisation?

No

Q8. What is the name of the organisation?

not answered

Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.

I do not think it's appropriate for this land to be rezoned and allow the Royal Perth Golf Club to profit - over and above their current activities aligned with their purpose - from land that was gifted by the public to them and we should be considering amendments that have greater public benefit.

Q11. Upload supporting documents

not answered

Q12. Upload supporting documents

not answered

**Respondent No:** 5**Login:** Anonymous**Email:** n/a**Responded At:** Jul 01, 2024 12:24:06 pm**Last Seen:** Jul 01, 2024 12:24:06 pm**IP Address:** n/a*Details removed at the request of the submitter*

Q1. What is your name?

Q2. What is your surname?

Q3. What is your email address?

admin@tbbplanning.com.au

Q4. What is your address?

PO Box 7130, Cloisters Square, PERTH WA 6850

Q5. What is your contact number?

Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

Q7. Are you responding on behalf of an organisation?

Yes

Q8. What is the name of the organisation?

Royal Perth Golf Club Inc

Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Support

Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.

Taylor Burrell Barnett (TBB) acting on behalf of our client, the Royal Perth Golf Club (RPGC), is pleased to provide a submission (refer uploaded supporting document) in support of Metropolitan Region Scheme (MRS Amendment 1423) which proposes to rezone the club's freehold land from the 'Parks and Recreation – restricted access' reserve to the 'Urban' zone. The RPGC is in full support of the MRS Amendment 1423. The advertised amendment report sufficiently covered the strategic aspects of the planning framework and its justification is clearly articulated. The subject site is considered to be suitable for rezoning and it comfortably fits into the state and regional framework, namely it is located on an urban corridor, and it is immediately abutting the boundary of the South Perth Activity Centre. The MRS Amendment 1423 serves to address an existing anomaly by appropriately rezoning this freehold land to the 'Urban' zone. This is consistent with the approach of applying the 'Urban' zone over the Joondalup Golf and Country Club, The Links Kennedy Bay clubhouse, Hamersley Public Golf Course, Dawesville Cut clubhouse, Mandurah Country Club, Secret Harbour Golf Links, and the Meadow Springs clubhouse. Being freehold land, the 'Urban' zone provides the RPGC with a statutory region zone, offering up opportunities to investigate ways to diversify their club operations and remain sustainable commensurate with their lease arrangements to run the adjacent golf course. We consider that it is in the interest of orderly and proper planning to establish zone the site under the MRS. The existing 'Parks and Recreation' MRS reserve classification is an impediment to the RPGC's ability for investigating any future opportunities for development or redevelopment of its freehold land to be appropriately recognised in the statutory planning framework. This amendment is a critical and positive step towards correcting an anomaly in the MRS, with clear recognition of the freehold lot in the 'Urban' zone. Further information is provided in the attached submission.

Q11. Upload supporting documents

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/2a1c2ca41e3af09fbe1146dfc0402d505375800b/original/1719800523/d37902d3bcc408f65ac20a2a715ebe51_19_033_LTR_Submission_MRS_Amendment_1423_revA.pdf?1719800523

Q12. Upload supporting documents

not answered

Our Ref: 19/033

1 July 2024

Attention: Brett Pye

Department of Planning, Lands and Heritage
Online Feedback Form
regionplanningschemes@dplh.wa.gov.au

Dear Brett

METROPOLITAN REGION SCHEME AMENDMENT 1423 (STANDARD) - LOT 1 LABOUCHERE ROAD, SOUTH PERTH

Taylor Burrell Barnett (TBB) acting on behalf of our client, the Royal Perth Golf Club (RPGC), is pleased to provide this submission in support of Metropolitan Region Scheme (MRS Amendment 1423) which proposes to rezone the above-mentioned property from the 'Parks and Recreation – restricted access' reserve to the 'Urban' zone.

Our submission makes comments in relation to:

- The background to the Royal Perth Golf Club;
- Support and rationale for the rezoning of the freehold land to 'Urban';
- Support for the automatic rezoning of the subject land under the City's Local Planning Scheme No. 7; and
- The RPGC's long-term outlook for their freehold land.

Background

The Royal Perth Golf Club (RPGC) is the oldest golf club in metropolitan Perth, and was awarded its royal status in 1937. The Certificate of Title for Lot 1 Labouchere Road, South Perth was created on 28 April 1989 with the registered proprietors being the Royal Perth Golf Club Inc. The freehold land has an area of 3,750m², and contains improvements including the club house building with administration offices, pro shop, restaurant, change room facilities, other conveniences and storage. Lot 1 Labouchere Road does not have any easements, caveats, restrictive covenants or other notifications limiting its sale, use and development.

Importantly, the RPGC's freehold lot is separate tenure to the golf course which is contained in the adjacent Crown Reserve. Abutting the building to the west is a breezeway and golf buggy storage building contained on the adjoining Crown Reserve 10250. The MRS Amendment 1423 has no impact on the adjoining Crown Reserve 10250.

The adjoining Crown Reserve 10250 applies to Lot 1162 on DP 220915, LR3116/857, which has a land area of 33.6444 hectares. Crown Reserve 10250 (purpose: public recreation) is vested to the City of South Perth with power to lease for any term not exceeding 50 years. The City has leased the land to the Royal Perth Golf Club Inc and we understand that approximately 33 years remain on the lease.

Since 2019, RPGC and TBB have been consulting with the City of South Perth, government agencies and the Department of Planning, Lands and Heritage. This has been undertaken through:

- Submissions on the City of South Perth Local Planning Strategy, the South Perth activity centre plan, and Local Planning Scheme No. 7; and
- A request to the WAPC to rezone the subject site to the 'Urban' zone under the MRS.

It is noted that the EPA published its determination that MRS Amendment 1423 is not to be assessed under Part IV of the *Environmental Protection Act 1986*. We understand that preliminary responses from other State government agencies, servicing agencies and the City were supportive. A review of environmental characteristics of the site revealed no notable values on the site as the site is extensively modified with no remnant vegetation and the site:

- does not contain any registered Aboriginal Cultural Heritage or State or Municipal heritage;
- is not identified for Acid Sulphate Soils risk;
- does not contain any surface water bodies, wetlands or overland flow paths;
- is not identified on the DWER Contaminated Sites Database;
- is not within a floodway or flood fringe;
- is not within a public drinking water source area; and
- is not subject to Bush Forever.

Support for rezoning to 'Urban'

The RPGC is in full support of the MRS Amendment 1423. The advertised amendment report sufficiently covered the strategic aspects of the planning framework and its justification is clearly articulated. The subject site is considered to be suitable for rezoning and it comfortably fits into the state and regional framework, namely it is located on an urban corridor, and it is immediately abutting the boundary of the South Perth Activity Centre.

The MRS Amendment 1423 serves to address an existing anomaly by appropriately rezoning this freehold land to the 'Urban' zone. This is consistent with the approach of applying the 'Urban' zone over the Joondalup Golf and Country Club, The Links Kennedy Bay clubhouse, Hamersley Public Golf Course, Dawesville Cut clubhouse, Mandurah Country Club, Secret Harbour Golf Links, and the Meadow Springs clubhouse.

Being freehold land, the 'Urban' zone provides the RPGC with a statutory region zone, offering up opportunities to investigate ways to diversify their club operations and remain sustainable commensurate with their lease arrangements to run the adjacent golf course.

We consider that it is in the interest of orderly and proper planning to establish zone the site under the MRS. The existing 'Parks and Recreation' MRS reserve classification is an impediment to the RPGC's ability for investigating any future opportunities for development or redevelopment of its freehold land to be appropriately recognised in the statutory planning framework. This amendment is a critical and positive step towards correcting an anomaly in the MRS, with clear recognition of the freehold lot in the 'Urban' zone.

Support for concurrent rezoning under the City of South Perth Local Planning Scheme No. 7

We understand that section 126(3) of the *PD Act* provides the WAPC the power to publish in the *Government Gazette* a notice amending the local planning scheme at the time the land is rezoned 'Urban' under the MRS. It is understood that the City of South Perth has made a submission to the DPLH, supporting MRS Amendment 1423 on the condition that a concurrent amendment to LPS 7 is also undertaken to rezone the site to the 'Private Community Purposes' zone.

RPGC respectfully supports the concurrent rezoning of the subject site under the City's LPS 7 in order to provide a suitable framework, with minimal cost, administration burden or time imposition on the City. As a matter of practicable policy and administration, and with the DPLH being in consultation with the City, this is considered to be the most appropriate way to achieve consistency between the MRS and LPS 7.

Under the 'Private Community Purposes' zone, a local development plan can be prepared. Pursuant to clause 32 and Table 7 of the LPS 7, the preparation of a Local Development Plan may provide for alternative height and setback provisions from those that apply by default. Based on recent conversations with the City of South Perth, it is understood that the intent of clause 32 of the LPS 7 is to facilitate the preparation of a Local Development Plan which would prevail over the default provisions contained in Table 7. The opportunity to prepare a LDP provides opportunities to investigate bespoke and unique design and development provisions for the site. The RPGC takes some comfort that, guided by the preparation of a Local Development Plan, diversification of the site would be possible to be investigated further.

RPGC's future aspirations

Our client RPGC sees a direct link and association between their lease of the golf course and club rooms and the development on the site, but also see their subsequent aspirations for redevelopment of their freehold land going beyond the purpose of the 'Private Community Purposes' zone. The RPGC does not have an agreed redevelopment vision in place yet, so their immediate objective is to ensure the site is appropriately zoned to 'Urban' under the MRS, to facilitate long-term investigations into future opportunities for the land.

Noting that the 'Private Community Purposes' zone provides an interim zone that facilitates ongoing operations, the RPGC does not see this as an impediment to investigating other opportunities, for example Additional Use or alternative zones in the future, that would more strategically align with a future vision and concept for the redevelopment of the land that may emerge from such investigations. The RPGC would have preferred an immediate 'Centre' or 'Special Use' zone that would have better aligned with the intent to pursue other opportunities to, but respects the City's position that an interim zone of 'Private Community Purposes' zone suits the current use whilst RPGC progresses a new vision for a higher and better use of the land.

Golf clubs are capable of becoming more integrated with their communities by not just offering memberships, but also expanding into other complementary services such as: dining and bar experiences; function centre; short-stay accommodation; leisure facilities; health, gym and lifestyle club facilities; golf academies; and lifestyle choices such as over 55's dwellings, and/or vertical retirement villages. All of these endeavours would be consistent and suitable for a golf course located in proximity to a capital city with a planning framework encouraging consolidated urban infill. Going forwards, the RPGC would be looking to investigate what opportunities could be possible and feasible in context to the ongoing operation of the site and their golf club activities.

Conclusion

The Royal Perth Golf Club supports the MRS Amendment 1423 to rezone the club's freehold land to the 'Urban' zone.

The RPGC supports a concurrent rezoning of the land under the MRS and the LPS 7. It is considered that a concurrent amendment is consistent with orderly and proper planning, and would provide an immediate local planning scheme zoning, land use permissibility, and default development provisions. The 'Private Community Purposes' zone will provide an interim zone for a range of uses that would be compatible with the club's operations, would reasonably be compatible with surrounding development, and provides the ability to prepare a Local Development Plan for the subject site to facilitate future uses and development.

The aspirations of the Royal Perth Golf Club are long-term, and nearly 33 years remain on the lease of the adjacent golf course. Whilst the RPGC is looking forwards to what opportunities may be appropriate to consider in the future, equally, the RPGC supports the MRS Amendment 1423 and concurrent rezoning of LPS 7 as a critical first step.

We thank the Western Australian Planning Commission and Department of Planning, Lands and Heritage for considering this submission in support of MRS Amendment 1423. Should you have any questions or require any clarification, please do not hesitate to contact the undersigned on 08 9226 4276 or via email michael@tbbplanning.com.au.

Yours faithfully



MICHAEL WILLCOCK
SENIOR ASSOCIATE

CC: Royal Perth Golf Club



Respondent No: 6

Login: Anonymous

Email: n/a

Responded At: Jul 01, 2024 15:57:07 pm

Last Seen: Jul 01, 2024 15:57:07 pm

IP Address: n/a

Q1. What is your name?	Bronwyn
Q2. What is your surname?	David
Q3. What is your email address?	bronwyn.david@gmail.com
Q4. What is your address?	PO Box 8205 South Perth Angelo St WA 6151
Q5. What is your contact number?	0414968193
Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?	No
Q7. Are you responding on behalf of an organisation?	No
Q8. What is the name of the organisation?	not answered
Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?	Oppose
Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.	
<p>The City of South Perth has very recently undertaken a review of its Local Planning Scheme (LPS7). It came before the WAPC last year, and passed the Planning Minister's desk this year. LPS7 rigorously examined and determined the City of South Perth's contribution to housing within the Perth Peel region. According to the passing of LPS7, the City's contribution to housing by way of the rezoning of areas to support higher density housing has been finalised. The rezoning of this area was not examined during this very public process, and we can only speculate as to why not. The rezoning of this parcel of land would result in an incongruous result, not in keeping with the surrounding areas of recreational land - Richardson Park and Perth Zoo to the north, and the golf course itself to the South. The area north of Richardson Park is already subject to more intensive land development, resulting in enormous strain on the existing major roads, especially Labouchere Road, which is narrow, hemmed in, and heavily trafficked. Any more development in the area will only result in more pressure on this road to the detriment of existing residents. Royal Perth Golf Club have obtained this land as "recreational" and paid consideration for it appropriate to the present zoning. It is "just not cricket", to borrow a sporting metaphor, to allow rezoning which would result in a handsome profit to a private company for the use of what many in the community would regard as forever "open space" (albeit already developed as a low level clubhouse, and only accessible to members. Still, we can stand outside and admire the greenery). Other sporting associations not as historically blessed as Royal Perth Golf Club are crying out for land and facilities in the area. If a trade-off of a parcel of land from the golf course, gifted by the Golf Course, in return for rezoning could be devised it would reflect very well on all concerned.</p>	
Q11. Upload supporting documents	not answered
Q12. Upload supporting documents	not answered



Respondent No: 7

Login: Anonymous

Email: n/a

Responded At: Jul 01, 2024 17:03:04 pm

Last Seen: Jul 01, 2024 17:03:04 pm

IP Address: n/a

Details removed at the request of the submitter

Q1. What is your name?

Q2. What is your surname?

Q3. What is your email address?

Q4. What is your address?

Q5. What is your contact number?

Q6. Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

Q7. Are you responding on behalf of an organisation?

No

Q8. What is the name of the organisation?

not answered

Q9. Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

Q10. Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded below.

The land is a small part of a larger Parks and Recreation Reserve and should remain that way. By rezoning, it will become an isolated pocket of land that could restrict use of the surrounding reserve in the future. The demand for public land in this area for community and recreational purposes will only intensify given the high and medium density residential development occurring in the surrounding area. Rezoning of the land would be shortsighted and adhoc. Rather than benefiting the community, the rezoning would only seem to benefit the landowner and their commercial/financial gain. Rezoning at this time when the City of South Perth Local Planning Scheme No. 7 has only just been gazetted would not seem to be consistent with orderly and proper planning. Presumably the Scheme met State Government targets for residential growth without including the land in question.

Q11. Upload supporting documents

not answered

Q12. Upload supporting documents

not answered