

Application for Development Wesley and Penrhos College Boatshed – Summary of public submissions under Section 74 of SCRMA

Issue	DBCA response
SUPPORT	
Amenity	
In keeping with foreshore architecture and sympathetic to the surroundings	The proposed development is significantly larger in scale than existing structures in the Coode Street Node N2 and includes architectural features that are notably different, such as the colour and materials of the roof structure and its overall mass.
Height of new building in keeping with nearby buildings	The proposed development is significantly larger in scale than existing structures in the Coode Street Node N2 and includes architectural features that are notably different, such as the colour and materials of the roof structure and its overall mass.
Aesthetically pleasing and improved amenity	The visual amenity of the location is enhanced with the removal of the existing boatshed and increased set back of 31 metres to the proposed boatshed.
Improved form and function of building to cater for needs of Wesley and Penrhos College	Noted.
Rowing boats on the Swan River contribute to amenity	DBCA acknowledges that rowing is a recreational opportunity afforded by the river. The activity of rowing is supported in this location by DBCA policy and the City of South Perth's Foreshore Strategy and Management Plan, however the development of physical infrastructure to support this activity needs to be considered separately in terms of amenity impacts.
Community Benefit	
Community use – Wesley and Penrhos communities, both current and past contribute to a large proportion of the South Perth population	Wesley and Penrhos College form part of the community, however, community as it relates to the <i>Swan and Canning Rivers Management Act 2006</i> encompasses the broader community including those people that may not live within the City of South Perth. This is further underscored by the zoning of the subject land as 'Parks and Recreation' which has regional significance and therefore impacts need to be considered on a broader community scale.
Rowing program open to all enrolled students, including children with a disability	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Encouraging and maintaining participation in sport, including women, youth and Indigenous youth	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .

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Much needed facility for Penrhos to engage girls in the sport of rowing	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Wider community benefits mentioned in the proposal – public accessible verandah	The applicant submitted amended plans on 28 March 2024 that detail removal of the verandah on the eastern side to reduce the size of the building by 7%. Public benefit is addressed through a community benefit contribution of \$300,000 from Wesley and Penrhos College to be paid to and held in trust by the City. The financial contribution would be utilised for upgrading Node 2, as outlined within the South Perth Foreshore Strategy and Management Plan.
Wider community benefits - replacement of old building with new aesthetically improved facility	The replacement of the old building with a new building may enhance the amenity. However, given the proposed development will increase the size and height of the building this is not considered to provide a direct benefit to the community.
Improving facilities that support recreation and increase access in this location	Improved facilities support recreation for the colleges. Access to the river is enhanced as a result of an increased setback of 31 metres to the proposed boatshed.
Recreational node, new facility supports and assists with activation of the area	New facility will assist in activation of the area through a greater number of students utilising the facility. However, activation is considered to be limited given the time of day and number of days per year that the facility is utilised.
Not solely serving the needs of private schools but investing in young athletes, promoting a healthy lifestyle and strengthening the local community	The proposed development will only be available for use by Wesley and Penrhos College students and not for use by the broader community. Policy 43 states that aquatic clubs in the DCA should provide a public benefit and contribute to the long-term community use and enjoyment of the Swan Canning river system without limiting public access or adversely affecting its ecological health and amenity. Furthermore, DC Policy 5.3 also states that the use and development of land reserved for Parks and Recreation which would result in restrictions to public access, notwithstanding the possible benefit which could be derived from the use and development to a specific educational group within the community, will not be supported. Public benefit is addressed through a community benefit contribution of \$300,000 from Wesley and Penrhos College to be paid to and held in trust by the City. The financial contribution would be utilised for upgrading Node 2, as outlined within the South Perth Foreshore Strategy and Management Plan.
Enhance educational experience beyond the classroom and supports the development of well-rounded, team-orientated individuals who will make positive contributions to society	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
The current adjoining playground and family bbq area remain unaffected by the proposal	The increased setback of 31 metres to the proposed boatshed will result in the building being located closer to the family bbq area, however, this will also result in greater

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	recreation opportunities on the river side of the proposed building and retention of mature vegetation.
The proposal will not change the status of an existing facility, by restricting access or introducing private membership as there is an existing facility in place.	While there is an existing rowing boatshed, the proposed development seeks to demolish this facility and expand the building, lease area and usage of the site.
A well-maintained rowing facility not only benefits the schools involved but enhances overall image of community	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Meets the expressed community request that the foreshore provide areas that can be used for junior sport (75% of respondents) from the Community Perspectives 2012 Survey (the City's CATALYSE Community Perceptions Survey)	The City of South Perth has undertaken further community engagement in 2022 to understand the community views around the Coode Street Node N2. Key priorities related to the improvement of waterfront access, creation of accessible spaces for unstructured games and maintaining the open feel of the parkland, City vista and natural habitat.
Increase visitation and use of existing commercial facilities and generally provides an economic benefit to the local community	Noted. Although limited given the time of day and number of days per year that the facility is utilised and this activity currently occurs to some extent.
Environmental	
Benefit the local ecology by enhancing the shore alongside the waterbird sanctuary	The proposed development does not include any measures that benefit the local ecology through enhancement of the shoreline. The amended plans provided by the Applicant provide an increased setback of 31 metres which will enable future foreshore works to improve the ecology of the area through softer interfaces that include revegetation.
Sympathetic focus on environmental preservation with minimal impact on the river and foreshore	The proposed development removes 8 mature trees. This has been reduced from 13 mature trees in the original proposal. The increased setback of 31 metres will enable future foreshore works to improve the ecology of the area through softer interfaces that include revegetation.
Enables river access without creating new imposts on the river foreshore	The amended plans detail an increased setback of 31 metres to the proposed boatshed. This will increase access to the river in this location and enable future foreshore works to be undertaken in a more environmentally sensitive manner.
Removal of introduced species and planting of 18 mature trees endemic to the area	The existing mature vegetation provides shade, cooling and habitat. Amended plans received on 28 March 2024 details the removal of 8 mature trees. Replacement planting of 24 trees is required in accordance with DBCA Policy.
Replacement with more trees than number of those being removed	Cl. 5.3 of Corporate Policy No. 42 states that as a guide, any vegetation removed within the DCA will likely be required to be replanted at a minimum ratio of 3 to 1 with

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	appropriate local native species. On this basis the removal of 8 mature trees will require the replanting of 24 appropriate local native species.
Additional shaded space	The proposed development initially included a verandah for additional shade, however, the amended plans received on 28 March 2024 has removed the verandah to reduce the scale of the building.
The proposed development outlines that the colleges commitment to the removal of the western boat ramp and revegetation of the area (900m ²)	The Application notes that this is potentially a future action proposed by the development of the boatshed. However, the City of South Perth has advised that it does not support the removal of the western boat ramp. The South Perth Foreshore Strategy and Management Plan recommends upgrading of the boat ramp and boat facilities in the Coode Street Node N2 location.
Flora and fauna plan will improve the aesthetics of the area	The Application included a landscaping plan as part of their original proposal and amended plans on 28 March 2024, but not a specific flora and fauna management plan. The Applicant will be required to produce an amended landscaping plan to address the requirements of the City in the Coode Street Node 2 area, including the location of replacement planting (24 trees).
Enriches students understanding of the local environment	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Rainwater harvesting to irrigate new landscaping	Noted.
City of South Perth in its two most recent major Foreshore developments (Swan Habitat and Mends Street) removed non-endemic trees and replaced them with location specific varieties, as is consistent with their own vegetation policies	The City of South Perth has removed non-endemic trees where necessary to support redevelopment of key public areas and nature-based projects. These projects also form part of a larger rehabilitation and tree replacement program.
Planting of native trees enhance habitat for native fauna	Landscaping around the proposed building proposes to include the planting of 24 endemic trees which would enhance habitat for native fauna over the long term. However, the removal of mature vegetation is considered to have an immediate impact.
Improve surrounding ecosystem through planting of riparian vegetation	No riparian vegetation is proposed by the development however, the increased setback of 31 metres which will enable future foreshore works to improve the ecology of the area through softer interfaces that include revegetation.

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Design	
Proposal is an extension to an existing building rather than new development	The proposed development is located on part of the existing lease area for the Wesley Boatshed, however, the proposal includes the removal of the existing building and construction of an entirely new building along with seeking an increased lease area.
Does not impact resident's views behind	The proposed boatshed will have some impact on views from behind it to the Swan River.
No evidence or justification that public views to and from the river or from vantage points will be impacted	Public views to and from the river and vantage points within the Coode Street area, will be impacted given the substantial increase in building footprint and height. The vantage point from the playground space and bbq area that is located to the southern side of the proposed boatshed will also be altered. Consideration should also be given to additional vantage points from around Perth Water and further, including Kings Park. The colour palette of the proposed building, particularly the roof will be highly visible.
Does not alter existing access	The proposed development increases the size of the boatshed from 450m ² to 982m ² (internal space) and the length of the boatshed along the foreshore from approximately 20 metres to 42.97 metres. An increased area of building on the foreshore precludes a greater area from access to the river. An increased setback of 31 metres will provide for greater public accessibility to the foreshore and will remove the perception that the beach in front of the boat shed is for exclusive use.
Preserves the existing concrete ramp / water access	The amended plans received on 28 March 2024 detail an increased setback of 31 metres to the proposed boatshed. The concrete ramp will be removed to provide a soft river interface.
The provision of public art in due course, in consultation with the Nyungah community	Noted. No details have been provided with the application.
Upgraded lighting in accordance with crime prevention through environmental design	Noted. No details have been provided with the application. Condition of approval required.
Large verandah creates additional shade and space on the waterfront for families to enjoy	The proposed development initially included a public use verandah for additional shade, however, amended plans received on 9 February and 28 March 2024 removed the verandah. The verandah as proposed in the original application did not facilitate a community benefit.

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Sympathetic to riverscape	<p>The size and height of the building contributes to increased building bulk within the river landscape. The increased setback of 31 metres to the proposed boatshed is considered to be more sympathetic to the riverscape than the original proposal.</p> <p>The use of light, reflective roof material is not considered to be sympathetic.</p> <p>In accordance with Corporate Policy No. 42 proposals should enhance and protect the character and landscape setting of the Swan Canning river system. Typically, proposals should protect tree lines and not dominate or overshadow public areas and views.</p>
Access	
No evidence that the proposed development restricts public access.	<p>The proposed development increases the size of the boatshed from 450m² to 982m² (internal space) and the length of the boatshed along the foreshore from approximately 20 metres to 42.97 metres. While the size of the proposed building restricts access, the increased setback of 31 metres to the proposed boatshed will facilitate greater public access to the river.</p>
Public access is maintained through retention of jetty, boat ramp and nearby beaches	<p>The proposed development increases the size of the boatshed from 450m² to 982m² (internal space) and the length of the boatshed along the foreshore from approximately 20 metres to 42.97 metres. An increased area of building on the foreshore precludes a greater area from access to the river.</p> <p>While the size of the proposed building restricts access, the increased setback of 31 metres to the proposed boatshed will facilitate greater public access to the river</p>
The area between the building and the river will be open to the public and can easily be accessed from either side and by walking around the building	<p>The original proposal with a minimal setback to the river edge impeded direct public access to the river. This was further restricted by the proposed landscaping and limited pedestrian access around and in front of the proposed building.</p> <p>The amended plans provided by the Applicant on 28 March 2024 provide an increased setback of 31 metres which will facilitate greater public access to the river, and will enable the construction of a pedestrian path between the river and the proposed building.</p>
City of South Perth have previously not supported a greater setback due to user conflicts between rowing shed and pedestrians/other foreshore users	<p>Noted. However, DBCA is required to consider the application as submitted under the <i>Swan and Canning Rivers Management Act 2006</i>.</p>
Planning	
Meets the objective and strategies of South Perth Foreshore Strategy and Management Plan (SPFSMP) including being	<p>The SPFSMP identifies use of the Coode Street Node N2 for increased opportunities for water-based activities including rowing, sailing, boat mooring and water play. While the activity “rowing” is specifically mentioned the strategies and actions for the node do not</p>

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family focussed and allowing for water based activities including rowing	specifically identify the expansion of existing infrastructure such as the Wesley Boatshed.
City of South Perth's response that was publicly advertised is misleading and omits information	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
City of South Perth's refusal is not supported by factual information only assumptions	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
DCP 5.3 Section 7 allows local government to provide a lease for Wesley and Penrhos Colleges for the purpose of a private rowing facility	Noted. Section 7 of DCP 5.3 covers matters to be covered by a lease agreement but this does not negate other provisions of this policy as they relate to use of the land and a clear demonstration of public benefit.
Development and activities keep with existing permitted use	The proposed development allows for significantly expanded use of the site for rowing by Wesley and Penrhos Colleges.
Alternative Location	
Ellam Street as an alternative location is unsuitable due to access and egress for coaches being restricted, pedestrian and cycle pathways too close to the river, existing riverbank wall is too high to allow for safe carriage of boats to and from the water, trees would have to be removed there also	The City of South Perth has identified Ellam Street as a suitable alternative location for the co-location of Wesley and Penrhos boatshed. However, the application requires consideration of the merits of proposed development on Reserve 34565 within the Coode Street Node N2 area.
Ellam Street site would require more extensive civil works and connection to sewerage potentially having greater impact on the environment	Noted. Ellam Street has been put forward as an alternative location, however the subject application needs to be considered on its merits and determined in the current location.
Other	
Historical connection to location and lease over existing site	Noted.
Wesley College require space for 12 boats, when the boatshed was first constructed they only required 4 boats	Noted. The College has provided information about the rowing programs for both schools and the number of students and boats to be accommodated on site.
Allows for opportunities to extend both colleges rowing fleets	Noted. The College has provided information about the rowing programs for both schools and the number of students and boats to be accommodated on site.
Co-location of two schools rowing facilities and shared management reduces ecological impact	While ecological impact is an important consideration, the subject site has high amenity value for the broader community which also needs to be balanced against the ecological impact of two separate facilities. The amended plans received on 28 March 2024 detail an increased setback of 31 metres to the proposed boatshed. The increased setback is considered to address the amenity and public access concerns in the Coode Street Node 2 location.

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Logistical challenges of Penrhos College disassembling and reassembling boats before and after training	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Rowing gym accommodates land-based trainings for when the weather is not safe to row	This is not considered to form part of essential infrastructure associated with the storage of boats and general facilities such as toilets/changerooms. Land based trainings can be held at existing gym facilities at both schools based upon weather being unsuitable for rowing.
Opportunity for community solar installation	Noted.
Other Councils with foreshore access have supported renovated and expanded rowing facilities including, St Hildas, Scotch College and Christ Church Grammar School	These foreshore areas have differing levels of public accessibility and use which cannot be directly applied to the merits of the proposed development on the South Perth foreshore.
Wesley and Penrhos College rowing history including Station, National and Olympic representation	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Addresses safety requirements of rowing, including supervision and boat handling	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Addresses safety concerns (syringes) regarding dark and shadowed building and improve passive surveillance	Noted. Passive Surveillance is not considered to be improved due to an upgraded building. The proposed development does not include any windows/openings except for the 5 roller doors and 1 window from the rowing gym which faces the river side.
Improved facilities, including toilets and kitchen	Noted.
May become another local icon such as the Crawley Boatshed	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Vocal minority in opposition against private school use of the facility on public owned land	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Proximity of boatshed location to both colleges	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Proposed development represents 0.0017% of the 62 hectares of South Perth foreshore	Noted. The representation of this site within the context of the entire South Perth Foreshore appears is small, however, it needs to be examined in the context of the Coode Street Node N2 area being a key site for foreshore use
City of South Perth Council have previously supported the co-location of a rowing facility in this location	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .

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A majority of parents and grandparents are ratepayers in the City of South Peth and want the area developed for use by the residents as well as visitors	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .
Management of demolition and construction is manageable and impact minimal	Noted. This can be addressed via CEMP.
OBJECTION	
Public Benefit	
Facility provides no public benefit	<p>SPP2.10, Draft SPP2.9, DBCA Policy 43, DC Policy 5.3 all highlight the need for land reserved 'Parks and Recreation' reserve within the Swan Canning Development Control Area to demonstrate public benefit. The public benefit initially identified by the proposed development was: improved visual amenity through the enhancement of the physical building and the inclusion of the 'sunrise verandah' for shade; public art, lighting, CCTV, landscaping including replacement tree planting.</p> <p>On balance and considering the scale and exclusive use of the building by the Colleges it was considered that the public benefit of the proposal had not been established.</p> <p>As a result of meetings with DBCA and the City, Wesley and Penrhos Colleges have submitted a written letter to DBCA confirming their collective agreement to make a community benefit contribution to the total amount of \$300,000. This would be paid to and held in a trust by the City and be utilised in future for the upgrading of Coode Street Node N2, as outlined within the South Perth Foreshore Strategy and Management Plan, within the South Perth foreshore.</p>
Increased lease area of land zoned Parks and Recreation. Needs to be minimised as much as possible and balanced against the purpose of the reserve	<p>Lot 778 and Lot 780 being Reserve 24112 are held in management by the City of South Perth for the purpose of 'Recreation Boat Shed'. Lot 11835 being Reserve 34565 is held in the management by the City of South Perth for the purpose of 'Recreation and Temporary Food and Beverage and other Entertainment Events'. The subject site is also zoned 'Parks and Recreation' reserve under the Metropolitan Region Scheme which is typically land of regional significance for ecological, recreation or landscape purposes. The expanded use of the foreshore reserve for a facility that is not available for use by the public should be balanced against the purpose of the reserve.</p> <p>As a result of meetings with DBCA and the City, Wesley and Penrhos Colleges have submitted a written letter to DBCA confirming their collective agreement to make a community benefit contribution to the total amount of \$300,000. This would be paid to and held in a trust by the City and be utilised in future for the upgrading of Coode Street</p>

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	Node N2, as outlined within the South Perth Foreshore Strategy and Management Plan, within the South Perth foreshore. The increased setback of 31 metres to the proposed boatshed will also assist in balancing the amenity and environmental impacts of the development.
Crown land not zoned for Education but Recreation	The subject land is zoned 'Parks and Recreation' reserve and not 'Public Purpose – Education. DBCA considers that although the proposed development provides recreation facilities, it is not entirely consistent with the reserves assigned purpose. It is further noted that the purpose of Reserve 24112 where part of the proposed development is located is "Recreation Boat Shed", which does not refer to education purposes.
Community benefit is not sufficient to justify the visual impact, obstruction of views and loss of public space	<p>The limited public benefit provided by the proposed development is not considered to provide an adequate offset against the negative impacts on the environment and community.</p> <p>As a result of meetings with DBCA and the City, Wesley and Penrhos Colleges have submitted a written letter to DBCA confirming their collective agreement to make a community benefit contribution to the total amount of \$300,000. This would be paid to and held in a trust by the City and be utilised in future for the upgrading of Coode Street Node N2, as outlined within the South Perth Foreshore Strategy and Management Plan, within the South Perth foreshore. DBCA considers that the community benefit contribution will provide an adequate opportunity to directly improve the function and development of the Coode Street Node.</p> <p>The increased setback of 31 metres to the proposed boatshed will also assist in balancing the amenity and environmental impacts of the development.</p>
Utilisation of boatshed is quite limited and occurs mainly in the morning and during school term	The boatshed is predominantly used in the morning and during school term. The facilities contained within the proposed development are only for rowing/training purposes and as such the buildings use will be limited.
Public benefit of verandah is not direct given lack of access proposed and perception of it being a private building	The proposed development initially included a public use verandah, however, amended plans received on 9 February and 28 March 2024 removed the verandah reducing the size of the boatshed by 7%. The verandah as proposed in the original application did not facilitate a public benefit.
Storage of boats, improved safety and amenities is understood however, extension of the building to provide a rowing gym and kitchen at the exclusion of other foreshore users is at odds with the public purpose of the reserve	Modernising the current boatshed to address safety and increased amenities for students is supported, however substantially increasing the size of the boatshed, removing mature trees and limiting access to the foreshore with no direct public benefit needs to be considered in terms of impact on the foreshore. This is considered to be

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	addressed through the increased setback of 31 metres to the proposed boatshed and a community benefit contribution of \$300,000.
Proposed development negatively impacts highly patronised family gathering area through reduction in vegetation, loss of views.	The original proposal removed 13 mature trees. The amended plans received on 28 March 2024 requires the removal of 8 mature trees. The increased setback of 31 metres to the proposed boatshed will impact on the family gathering area to the south. However, the increased setback will afford greater public access to the river than currently exists in the Coode Street Node N2 location.
Privatisation of public land zoned for Parks and Recreation	The proposal does not demonstrate a public benefit as it is required to do under SPP2.10, Corporate Policy 43 and DCP5.3. SPP2.10 states that club facilities for water-based sports, should only be permitted adjacent to the river where there is a demonstrated public benefit, public access to the river and its foreshore is not restricted, and membership of the club is open to all members of the community. As a result of meetings with DBCA and the City, Wesley and Penrhos Colleges have submitted a written letter to DBCA confirming their collective agreement to make a community benefit contribution to the total amount of \$300,000. This would be paid to and held in a trust by the City and be utilised in future for the upgrading of Coode Street Node N2, as outlined within the South Perth Foreshore Strategy and Management Plan, within the South Perth foreshore. The increased setback of 31 metres to the proposed boatshed will also assist in balancing the amenity and environmental impacts of the development.
Amenity	
Reduced visual amenity	The size and height of the building contributes to increased building bulk within the river landscape. The amended plans received on 28 March 2024 detail an increased setback of 31 metres to the proposed boatshed which is considered to be more sympathetic to the riverscape than the original proposal. In accordance with Corporate Policy No. 42 proposals should enhance and protect the character and landscape setting of the Swan Canning river system. Typically, proposals should protect tree lines and not dominate or overshadow public areas and views. The proposed development dominates the view to the river from the adjoining recreational space. However, an increased setback affords greater public accessibility and retention of mature foreshore vegetation. The visual amenity of the area will be further enhanced as a result of the City's future foreshore enhancement works associated with Coode Street Node N2 which is being supported by a \$300,000 community benefit contribution from Wesley and Penrhos Colleges.

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Transfer of public amenity to the private amenity without any reciprocal public benefit	<p>The proposal does not demonstrate a public benefit as it is required to do under SPP2.10, Corporate Policy 43 and DCP5.3. The proposal is not open to all members of the public which is considered to be inconsistent with the requirements of DCP5.3.</p> <p>As a result of meetings with DBCA and the City, Wesley and Penrhos Colleges have submitted a written letter to DBCA confirming their collective agreement to make a community benefit contribution to the total amount of \$300,000. This would be paid to and held in a trust by the City and be utilised in future for the upgrading of Coode Street Node N2, as outlined within the South Perth Foreshore Strategy and Management Plan, within the South Perth foreshore. The increased setback of 31 metres to the proposed boatshed will also assist in balancing the amenity and environmental impacts of the development.</p>
Negatively impacts vistas from park and Perth City	<p>The location of the proposed development will impact vistas from the park. However, the increased setback of 31 metres enables greater public access to the foreshore and additional opportunities to enhance vistas can be achieved. The use of appropriate building colours and materials will also assist in ameliorating any visual impacts from across the river within the City of Perth.</p>
Obscures view from regional playground and family bbq area	<p>The location of the proposed development will impact the existing playground and bbq area. However, the increased setback of 31 metres enables greater public access to the foreshore and additional opportunities to enhance vistas can be achieved.</p>
Reduced shade	<p>The removal of 8 mature trees will impact shade in the location. The Applicant will be required to produce an amended landscaping plan to address the requirements of the City in the Coode Street Node 2 area, including the location of replacement tree planting (24 trees).</p>
Amenity value of mature vegetation needs to be considered in quantifiable means	<p>The City of South Perth has provided a breakdown on the amenity value of the original proposal to remove 13 mature trees which was estimated at \$1,067,744. The removal of 8 mature trees has an estimated amenity value of \$534,293 (not including the additional tree unmapped to the east of the proposed development).</p>
13 existing trees have an asset value of \$1.3 million	<p>The amended plans propose the removal of 8 mature trees with an estimated amenity value of \$534,293 (not including the additional tree unmapped to the east of the proposed development).</p> <p>Significant landscaping around the proposal area will minimise the visual impact of the proposal and to provide for long term environmental benefits on the site.</p>
Environmental	

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Removal of mature vegetation and existing tree canopy that provide good canopy cover for shade, cooling, habitat and natural amenity	The proposal includes the removal of 8 trees. The increased setback of 31 metres will assist in the retention of 5 existing mature trees, including the <i>Corymbia citriodora</i> . The Coral trees are considered to be a potential host tree for the PSHB and their removal is considered acceptable. The retention of as many suitable mature trees as possible is important to retain existing tree canopy for shade, cooling, habitat and natural amenity of the area. The amended plan received on 28 March 2024 achieves a better outcome for tree retention.
Removal tree canopy and root systems, will result in less filtration of rain to ward against soil erosion	Noted. An increased setback of 31 metres will enable the retention 5 mature trees. The increased setback will also enable a softer foreshore interface to be implemented, which will have a positive impact on foreshore stability, environmental and community access outcomes.
Replacement planting is less than ideal, will take many years (20+ years for maturity) to establish and only includes maintenance for two planting seasons	Noted. A condition can be included to require additional maintenance provisions.
Planting of new trees on South Perth foreshore is often met with opposition	Noted. The Applicant will be required to submit an amended landscape plan with input from the City that details the location of replacement tree planting.
Negative impacts on fragile ecosystem, including birdlife and other wildlife	The proposal includes the removal of 8 trees. The increased setback of 31 metres will assist in the retention of 5 existing mature trees, including the <i>Corymbia citriodora</i> . The Coral trees are considered to be a potential host tree for the PSHB and their removal is considered acceptable. The retention of as many suitable mature trees as possible is important to retain existing tree canopy for shade, cooling, habitat and natural amenity of the area. The amended plan received on 28 March 2024 achieves a better outcome for tree retention. The increase setback of 31 metres will also enable the City to undertake foreshore works that remove hard infrastructure (riverwall) and install softer river interfaces and areas of revegetation that will improve the natural environment.
Existing mature trees (including non-endemic; <i>Corymbia Citriodora</i>) provide invaluable foraging and nesting habitat for endangered species such as Red tailed and Carnaby's Cockatoos. The replacement of these trees with younger species fails to consider the critical importance of the need for large tree hollows for birds who are facing critical existential threats because of loss of habitat. The area is known to be a site for black cockatoos and therefore the protection of these trees from removal is paramount	The <i>Corymbia Citriodora</i> is proposed to be retained as a result of the amended plans received on 28 March 2024 that detail an increased setback of 31 metres. In addition to this the Applicant will be required to address the removal of 8 trees with 24 endemic trees to compensate for the loss of vegetation in accordance with DBCA Policy. The Coral trees are considered to be a potential host tree for the PSHB and their removal would be considered acceptable. The retention of as many suitable mature trees as possible is important to retain existing tree canopy for shade, cooling, habitat and natural amenity of the area.

Issue	DBCA response
Proposed development should be further setback from river	Based upon the recommendations of Perth Water Locality Plan, South Perth Foreshore Strategy and Master Plan along with DBCA Policy framework, the Applicant has submitted amended plans on 28 March 2024 that detail an increased setback of 31 metres to the proposed boatshed. This is considered to minimise the impact on the environment and increase public accessibility.
Removal of a large number of mature trees may destabilise the foreshore in this location	The increased setback of 31 metres to the proposed boatshed will enable the retention of mature trees close to the foreshore. Furthermore, the increased setback will enable future foreshore works to utilise softer treatments to stabilise the foreshore and improve the natural environment.
Water quality will be negatively impacted	The proposed development is required to comply with DBCA Policy 49 and 51 including connection to wastewater and the installation of appropriate stormwater control measures.
Non-endemic trees considered to be great value to community and environment	Noted. Amenity value has also been calculated which further reinforces the value of the existing mature vegetation in the area. The 8 mature trees proposed to be removed have an estimated amenity value of \$534,293 (not including the additional tree unmapped to the east of the proposed development).
Removal of trees affects air quality and carbon sequestration	Noted. Cl. 5.3 of Corporate Policy No. 42 states that as a guide, any vegetation removed within the DCA will likely be required to be replanted at a minimum ratio of 3 to 1 with appropriate local native species. On this basis the removal of 8 mature trees will require the replanting of 24 appropriate local native species.
Increase road and river traffic with negative impacts on wildlife – on land, in water and air.	Wesley and Penrhos Colleges are currently utilising the facility and therefore impacts are considered to be similar.
River traffic (including regular use of power boats) have a detrimental effect on island bird refuge	Noted. Wesley and Penrhos Colleges are currently utilising the facility and therefore impacts are considered to be similar.
Access	
Reduced public access along river edge. New development should incorporate greater public access not reduce it.	The initial proposal submitted did not adequately address public access along the river edge. Through further negotiation with the Applicant and the City revised plans were submitted by the Applicant on 28 March 2024 which detail a setback of 31 metres to the proposed boatshed. This amendment will facilitate a future softer foreshore interface and greater public accessibility between the boatshed and the rivers edge. This will enable the City to implement river access in their plans for Coode Street Node N2.
Report refers to removal of boat ramp and rehabilitation of western side of foreshore	The planning report refers to the removal of the boat ramp as part of further discussions with the City outside of the application. DBCA has confirmed that the City does not

Issue	DBCA response
	support the removal of the boat ramp and the Applicant has removed this proposal from their application.
Design	
Building bulk and height will impact upon views of nearby residents	<p>The proposed boatshed increases its roof height from 5 metres to 8.58 metres and the length of the building from 20.25 metres to 42.97 metres.</p> <p>The building design is based upon the co-location of Wesley and Penrhos's rowing programs which necessitates a larger building footprint and increased height for adequate space to stack rowing boats.</p> <p>The increased height and length of the building will impact upon views of nearby residents. Additional planting of trees around the building may assist in minimising the visual impact as well colours and materials of the building being in tones that complement the river foreshore setting.</p> <p>Should the overall height be deemed unacceptable the roof design could also be amended to reduce bulk either through a lower pitch or use of different colours and materials.</p>
Increased building footprint	The proposed development increases the size of the existing boat shed from 450m ² to 1,059m ² .
Increased building height	The proposed development increases the height of the existing boat shed from 5 metres 8.58 metres.
Building includes kitchen facilities with the possibility of hosting events	The proposed development includes a kitchenette inside the rowing gym. It is not clear exactly what facilities are proposed other than a sink, benchtops and under bench storage. Hosting events has not been put forward as part of the application. The Application is only for use of the facility for rowing boat storage and training related activities and will be conditioned for these specific uses.
Inclusion of gym and kitchen are considered to increase the bulk of building and further reduce public access	The inclusion of the gym and kitchen facility increases the size of the building by approximately 66m ² . The inclusion of the gym contributes to an additional 10 metres or approximately an additional quarter of the building. The Applicant has stated that the inclusion of the gym is critical for the function of the building so that children can undertake gym activities when injured or when the weather does not permit rowing.
Consider impact from views across river and Kings Park, the proposed boatshed will present as a large, light coloured, perfect rectangle.	The roof structure as viewed from Kings Park is likely to be visible. Consideration should be given to the use of colours and materials that complement the river foreshore location.

Issue	DBCA response
Building design is more reflective of warehouse/factory unit and design needs to reflect riverine environ	The building design is based upon the co-location of Wesley and Penrhos's rowing programs which necessitates a larger building footprint and increased height for adequate space to stack rowing boats. However, consideration should be given to the use of colours and materials that complement the river foreshore location.
Plans do not include a visual representation of what the proposed development will look like from the play space behind	The Applicant has included a number of visual representations that depict what the building will look like from a variety of locations including further along Coode Street. The increased setback of 31 metres to the proposed boatshed will be shown on amended plans and design renders and the Applicant will be required to provide a visual representation of the development from the play space.
Alternate Location	
Consider utilising land directly to the west of and adjacent to buildings at Ellam Street. This area is underutilised as a recreational passive/active area, there exists a large carpark to service the boatshed users, the river wall is dilapidated and therefore the building of boat ramps would serve to reduce capital costs, and due to Heirisson Island the waters are sheltered for boat users.	Noted. Ellam Street has been put forward as an alternative location, however the subject application needs to be considered on its merits and determined in the current location.
Ellam Street is underutilised and proposes to include sporting precinct of foreshore in SPFMP	Noted. Ellam Street Node N10 is identified in the SPFSMP as an area to improve exercise, sport and recreation facilities for outdoor sporting infrastructure and water based activities such as rowing. However, consideration of the proposal in the Coode Street location must be determined on its own merits.
Consider alternative location at Ellam Street Node in a treeless location with a smaller building footprint	The proposal is for the co-location of two colleges rowing programs and an increase in building footprint area is appropriate for a combined facility. Consideration of the proposal in the Coode Street location must be determined on its own merits.
Parking	
Parking has not been addressed by proposed development and increased number of staff, students and parents accessing the site.	DBCA Policy 43 Clause 5.19. At minimum restriction on time facility can be used and condition regarding parking

Issue	DBCA response
Planning	
The proposal is inconsistent with the <i>Swan and Canning Rivers Management Act 2006</i> , State Planning Policy 2.10, DBCA Corporate Policies 42, 43 and 45, Draft State Planning Policy 2.9 and Development Control Policy 5.3.	Consideration of the proposal against the planning framework will be addressed in detail within the report.
The proposal is inconsistent with the City of South Perth Foreshore Strategy and Management Plan (SPFSMP)	Policy 43 requires that planning applications for aquatic facilities should be consistent with an endorsed precinct or foreshore management plan for the area. The SPFSMP identifies use of the Coode Street Node N2 for increased opportunities for water-based activities including rowing, sailing, boat mooring and water play. While the activity “rowing” is specifically mentioned the strategies and actions for the node do not identify the expansion of existing infrastructure such as the Wesley Boatshed. However, it is considered with a setback of 31 metres, the proposal will address concerns around public accessibility and future use of the Coode Street Node N2 area. The greater setback will allow for a softer foreshore interface, retention of mature vegetation and enhance opportunities for the City to connect the redevelopment of the playground and family bbq area to the river.
Inconsistent with SPP7.0 – Design of the Built Environment	<p>The increased setback of 31 metres to the boatshed will allow for the development to better respond to and enhance the distinctive characteristics of the local area. By increasing public accessibility to the foreshore and integrating the boatshed with the surrounding community uses, this enables the development to positively respond to the intended future character of the area for community use (increased water-based activities and family recreation space) and generally improves legibility.</p> <p>Amenity of the proposed development has only been considered by the Applicant as the amenity for the intended users. This is not considered to be the only form of amenity under assessment. Amenity as defined by SPP7.0 includes external spaces that are designed to feel welcoming and comfortable. It is considered that the increased setback of 31 metres and appropriate siting of the building provides an opportunity to increase the amenity by retaining existing mature trees and increasing public accessibility to the river.</p> <p>In regard to built form and scale, the massing and height of the development is not considered appropriate to the setting, however the use of the building for co-location purposes requires the proposed building footprint.</p>
Inconsistent with SPP2.10 statement for the Perth Water Section (para 8.3) as the development:	The size and height of the building contributes to increased building bulk within the river landscape. The amended plans received on 28 March 2024 detail an increased setback

Issue	DBCA response
<p>1. Would restrict public views of the river, including the northern Perth foreshore;</p> <p>2. Would restrict public access to the river; and</p> <p>3. Does not enhance the appearance or function of the public recreation and would privatise public space</p>	<p>of 31 metres to the proposed boatshed which is considered to be more sympathetic to the riverscape than the original proposal.</p> <p>In accordance with Corporate Policy No. 42 proposals should enhance and protect the character and landscape setting of the Swan Canning river system. Typically, proposals should protect tree lines and not dominate or overshadow public areas and views. The proposed development dominates the view to the river from the adjoining recreational space. However, an increased setback affords greater public accessibility and retention of mature foreshore vegetation. The visual amenity of the area will be further enhanced as a result of the City's future foreshore enhancement works associated with Coode Street Node N2 which is being supported by a \$300,000 community benefit contribution from Wesley and Penrhos colleges.</p>
<p>Inconsistent with the intent of the MRS (benefits the membership of a private club)</p>	<p><i>Development Control Policy 5.3 – Use of Land Reserved for Parks and Recreation and Regional Open Space</i> (Western Australian Planning Commission 2017) permits incorporated sporting clubs to locate on lands reserved for Parks and Recreation. Although Wesley College has been long established at this location it is not an incorporated sporting club that is open to all members of the public.</p>
<p>Inconsistent with Perth Water Buneenboro Locality Plan as the development does not recognise and expand the natural habitat (loss of valuable vegetation), privatises public land and is outside of identified formal recreation areas.</p>	<p><i>Perth Water Locality Plan</i> notes that Coode Street and Jetty has a continued role as a space for community recreation and events with expanded opportunities for water-based recreation and environmental conservation facilitating direct interaction with and appreciation of the river.</p> <p>The amended plans received from the Applicant on 28 March 2024 provide an increased setback of 31 metres to the proposed boatshed which will enable future foreshore works to improve the ecology of the area through a softer foreshore interface that includes revegetation.</p> <p>As a result of meetings with DBCA and the City, Wesley and Penrhos colleges have submitted a written letter to DBCA confirming their collective agreement to make a community benefit contribution to the total amount of \$300,000. This would be paid to and held in a trust by the City and be utilised in future for the upgrading of Coode Street Node N2, as outlined within the South Perth Foreshore Strategy and Management Plan, within the South Perth foreshore. The increased setback of 31 metres to the proposed boatshed will also assist in balancing the amenity and environmental impacts of the development.</p>
<p>Replacement planting inconsistent with DBCA policy</p>	<p>Cl. 5.3 of Corporate Policy No. 42 states that as a guide, any vegetation removed within the DCA will likely be required to be replanted at a minimum ratio of 3 to 1 with appropriate local native species. On this basis the removal of 8 mature trees will require the replanting of 24 appropriate local native species.</p>

Issue	DBCA response
Other	
Political lobbying will influence the decision-maker	Noted. Not relevant to the determination of this application under the <i>Swan and Canning Rivers Management Act 2006</i> .