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**Australian Institute of Architects** 

Mr Geoff Glass Chief Executive Officer City of South Perth Cnr Sandgate Street & South Terrace SOUTH PERTH WA 6151

Dear Mr Glass

## **CITY OF SOUTH PERTH - AMENDMENT NO. 46**

The Australian Institute of Architects advocates on behalf of the architecture profession and the community to enhance the quality and amenity of our built environment. We take this opportunity to comment on City of South Perth Amendment No. 46 to Town Planning Scheme No. 6, which seeks to "rectify anomalies and ambiguities in the special provisions for development in the South Perth Station Precinct".

At the outset we do not support the amendment, believing it be retrograde and contrary to the spirit of the State Government's *Directions 2031 and Beyond* planning strategy which recommends high quality inner city development to meet population growth. Indeed there was widespread support for the City's current town planning scheme ahead of its adoption in January 2013 when an extensive public consultation process was undertaken.

Of particular concern is the removal of up to 15% (or 20,000m²) of developable land, something that threatens more than \$240 million in direct construction investment and an estimated 8000 jobs. Similarly the proposed height limit reductions, commercial-residential ratios and setbacks represent a significant impediment to investment. There is also every likelihood that the State Government will put on hold, plans for a South Perth train station and increased ferry services without necessary commercial and residential density to support the transport services.

The Institute understands that there has been little empirical study used to justify Amendment No. 46 with Council instead being influenced by a vocal anti high-rise group. This should alarm residents of not just South Perth, but any jurisdiction relying on mixed development growth and visitor numbers in order to be economically sustainable.

We recommend in the strongest possible terms that Amendment No. 46 be rejected by the City of South Perth Council.

Yours sincerely

PHILIP GRIFFITHS FRAIA RIBA M.ICOMOS

STATE PRESIDENT WESTERN AUSTRALIA