

**NEW SUMMARY OF SUBMISSIONS**  
**Local Planning Policy (LPP) 3.5 Public Realm Guidelines**  
**Local Planning Policy (LPP) 3.8 Built Form Guidelines**  
**BYFORD TOWN CENTRE**

Submitter	No	Submitter Comments	Officer Comment
DWER IN22/22119	1.	<p>The Department of Water and Environmental Regulation (the Department) supports the development of the Byford Town Centre - Built Form and Public Realm Guidelines as an important overarching planning document that guides future planning and development within the subject site.</p> <p>The Department has only one comment for your consideration which relates to the Byford Town Centre - Built Form Guideline Section 4: General Policy Provisions, Design Element 4.17: Landscaping and Urban Ecology. This element should include the Design Objective that carparks are design and stormwater managed in line with water sensitive urban design principles. These principles can be found in documents such as the <i>'Decision process for stormwater management in WA (DoW 2016)'</i>, the <i>'Stormwater Management Manual for Western Australia (DoW 2004–2007)'</i> and New Water Ways - Carpark developments/retrofits' (<a href="https://www.newwaterways.org.au/wp-content/uploads/2020/09/CarparkRetrofit_final.pdf">https://www.newwaterways.org.au/wp-content/uploads/2020/09/CarparkRetrofit_final.pdf</a>)</p>	<p>The Shire supports the inclusion areas in the Byford Town Centre being designed to align with water sensitive urban design, specifically for carparks to be designed to manage storm water inline with water sensitive urban design. A modification has been recommended to include reference water sensitive urban design within the Design Objectives and include reference to carparks being designed according to water sensitive urban design within a new Policy Requirement.</p>
Public Transport Authority IN22/23419	2.	<p>Thank you for providing the Public Transport Authority (PTA) with the opportunity to review and provide comments on draft Local Planning Policy 3.5 – Byford Town Centre Public Realm Guidelines (LPP 3.5) and draft Local Planning Policy 3.8 – Byford Town Centre Built Form Guidelines (LPP 3.8). The PTA has carefully considered both LPP 3.5 and LPP 3.8 particularly given the importance of the Byford Rail Extension Project (BRE Project), and the purpose of each policy. It is very positive to see that the Shire is already considering the future vision of the Byford Town Centre and the future station precinct. To provide the Shire with a comprehensive response, the PTA's Rail Planning Branch, Transperth and METRONET have reviewed the LPP 3.5 and LPP 3.8, with our consolidated comments re set out in the following three parts of the response, part 1; general comments, part 2: LPP 3.5 and part 3: LPP 3.8. The general comments in part 1 are</p>	<p>The Shire has reviewed The PTA's submission in detail and has consulted DPLH's METRONET Team in regard to some of PTA's comments. The final Place Plan for the Byford Station is still requiring finalisation. This may arise to some minor differences within the Policies, in regard to the Indicative Model of the Byford Town Centre. However, METRONET have expressed no significant concern to the minor differences.</p> <p>Shire officers have recommended modifications to the policies in regard to bus stop design, bus shelters, shared streets, cross sections, accessibility, acoustic mitigation measures and</p>

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		<p>intended to be considered across both policies. The PTA comments are as follow:</p> <p><b>Part 1: General Comments</b></p> <ol style="list-style-type: none"> <li>1. Since the Shire's Byford Town Centre Local Structure Plan was amended in February 2022, a large portion of the Byford Town Centre has been placed under Planning Control Area 164 – Byford Rail Extension (PCA 164), gazetted on the 22 April 2022. The purpose of PCA 164 is for the Byford Rail Extension Project (BRE Project) METRONET, as such the proposed zones and land uses envisaged in the Local Structure Plan may need to be revisited.</li> <li>2. Whilst the PTA is supportive of the overall intention of both LPP 3.5 and LPP 3.8 in providing guidance for the development of the Byford Town Centre, it is recommended that the LPPs are consistent with the BRE Project including, BRE Project Precinct Plans and any relevant policies and strategies. Consideration of the supporting BRE Project plans, policies and strategies will also support the LPPs consideration of the needs of people travelling on Transwa services as well as Transperth passenger services.</li> <li>3. If the Shire has not done so already, it is advised that the Shire refines the LPPs in consultation with Lisl Van Aarde, METRONET's Planning Manager responsible for precincts for the BRE Project who can be contacted at <a href="mailto:Lisl.VanAarde@dplh.wa.gov.au">Lisl.VanAarde@dplh.wa.gov.au</a>.</li> <li>4. The PTA is supportive of the intent within LPP 3.5 and LPP 3.8 regarding the treatment of stormwater culverts and 'appropriate stormwater management' in developing the area, however, stormwater from within the Town Centre should not be discharged and/or impact the functioning of the Railway Reserve.</li> <li>5. The proposed cross section for the local road network must be designed to ensure that the roads can accommodate Transperth buses and are</li> </ol>	<p>crime prevention through environmental design, in order to address PTA's comments.</p> <p>Part 3 – Point 22: The Policy does not allow Tudor, Mediterranean, Santa Fe and Tuscan architectural styles within the Byford Town Centre as they do not align with the rural amenity of the Town Centre. Development Applications are assessed on their individual merit and Shire officers believe that there are different architectural styles that are more suitable to the rural amenity. It is for this reason that Tudor, Mediterranean, Santa Fe and Tuscan are not supported. A list of desired architectural styles has not been proposed in order to not limit developers within the area and allow for Development Applications to be assessed on their individual merit against the Built Form Guidelines.</p>


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		<p>suitable for the operation of bus services. To ensure buses are able to safely manoeuvre through the local road network, while also efficiently servicing the community, the following requirements are required:</p> <ul style="list-style-type: none"> <li>• For safe two-way bus operations, a 7-metre-wide pavement is required.</li> <li>• To maximise the catchment of a bus route, it is preferred to operate bus routes along roads that are located centrally on straight and direct alignments in the areas that they are designed to serve.</li> <li>• Desirably, bus routes are spaced 800 to 1000 metres apart with the aim of a 500- metre walking catchment to bus routes.</li> <li>• Consideration should be given to good pedestrian permeability to bus routes and safe pedestrian crossings to support the walkability and ease of access to bus services in the area.</li> </ul> <p><b>Part 2: Local Planning Policy 3.5 – Byford Town Centre Public Realm Guidelines (LPP 3.5)</b></p> <p>6. Page 8 – 3.3 Contextual Identification – The PTA supports the contextual design and material themes given they are positive and complementary to those in development for the BRE Project.</p> <p>7. Page 11 – Diagram 2: Street Network - The legend includes a ‘potential shared streets/areas’, which extends across the Railway Reserve. It is unclear what the Shire envisages the ‘shared streets/areas will include. It is assumed that bus services will utilise Blackburn Road and/or Clara Street West to access the future bus interchange, giving rise to potential bus/pedestrian conflicts.</p> <p>8. Page 12 – Policy Requirements - Where a railway station or public transport interchange interfaces with a public space, provide active uses at ground level at the station or interchange interface with the public space.</p>	

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		<p>The BRE Project has a Place Plan that includes active uses within the station project and recommendations for adjacent future development sites, including Day 1 and future conditions. The Byford Station Place Plan and LPP 3.5 are broadly consistent in this regard but will require further coordination between METRONET and the Shire going forward.</p> <p>9. Pages 13-14 – Cross Sections - As outlined in Point 5, the proposed cross sections must be designed to accommodate Transperth buses serving the area.</p> <p>10. Page 15 – Diagram 3 – The civic space marker is generally supported. However, it is suggested that an adjusted indicative shape is shown on Diagram 3 to better reflect the rail corridor condition, as shown (in green) in the annotated Diagram 3, below:</p>	

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		<p style="text-align: right;"><i>Diagram 3: Shared streets and civic spaces</i></p>  <p>11. Page 16 – Promote use of soft landscaping within the train station site to reduce the heat island effect and create comfortable spaces for the public – This is consistent with the landscape and urban design approach in the station project.</p> <p>12. Page 23 – 4.5 Public Art: These themes should be utilised when considering public art – While the METRONET Public Art Strategy applies foremost to work delivered in the station project. Projects/development in the vicinity of Byford Station are encouraged to have regard for the</p>	

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		<p>METRONET BRE Public Art &amp; Interpretation – Public Art Plan, whether the works are undertaken by private developers, or the Shire.</p> <p>13. Page 25 – Diagram 10: Potential locations for activation of public realm – The station forecourt is the only marker within the station project and PTA is generally supportive of this. The PTA have no objections to the other markers located outside of the station project boundary.</p> <p>14. Page 26 – 4.8.1: Activation: Access and Movement – The PTA has a responsibility to provide bus stops that are accessible for users of all ability levels. The PTA would urge that accessibility and safe pedestrian crossings are factored in, in particular around any future bus routes and those existing routes along South Western Highway and Abernethy Road.</p> <p>15. Page 29 – 4.9.1 Seating – Whilst the responsibility to supply and maintain bus stops sits with the Local Government, they must comply with the PTA's standards and placement in accordance with the Bus Stop Design Guidelines (BSDG, attachment 2). The PTA advises that additional funding can be provided to the Local Government through the Bus Shelter Subsidy Program (BSSP) for the inclusion of bus shelters within selected locations (pursuant to selection criteria). Should the Shire apply to have a shelter under the BSSP, the shelter must be selected from a predetermined panel of suppliers and designs. Outside of the subsidy program the Shire may engage any contractor and any shelter design, so long as it meets the requirements outlined in the PTA's BSDG and is approved by PTA prior to it being manufactured/installed.</p> <p>16. Page 30 – 4.0 Policy Provisions – These elements are addressed in detail in the BRE Project with Shire's contribution.</p> <p>17. Page 31 – 4.10.1 Paving – Where bus stops are located within paved environments, the PTA's current default design requirements is for poured concrete installation. There is room for inclusion of colour matched - spray faux pave treatment within the bus stop area. Should the Shire request the</p>	

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		<p>bus stop be paved to match existing environment, the PTA can accept this request upon the Shire entering a mutual agreement with the PTA, accepting all responsibility to maintaining the safe, level condition of the paving and the tactile indicators that form the bus stop, as well as accepting all liability related to the paving (trip hazards, etc.).</p> <p>18. Page 33 – 4.11.1 Bus Port - The 'Urban' shelter is commonly accepted by Transperth as the preferred style of shelter for the Shire and is supplied by one of the PTA's existing panel contractors. As such, PTA's Bus Stop Infrastructure team is able to accommodate supply and installation of 'Urban' shelters. Furthermore, the 'Urban' shelter design has provision of solar powered lighting and other amenities upon request, noting these accessories are not covered under the PTA's BSSP and would be at the Shire's cost. Attachment 1 is the Bus Shelter Buyers Guide for the Shire's reference.</p> <p><b>Part 3: Local Planning Policy 3.8 – Byford Town Centre Built Form Guidelines (LPP 3.8)</b></p> <p>19. Page 6 – 2.2 Built Form Concept – METRONET has a Place Plan for the station extent and its interface with the precinct. The Shire is advised to review the Place Plan and consult with the METRONET contact (provided above) to ensure consistency between LPP 3.8 and the METRONET project Place Plan.</p> <p>20. Page 7 – Figure 3: Byford Destination:</p> <ul style="list-style-type: none"> <li>• Future points/places of attraction – The bus interchange and train station should both be marked as important places of attraction due to their function and need for good connectivity to the surrounding precinct.</li> </ul>	

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		<ul style="list-style-type: none"> <li>• Pedestrian Connection – It is noted that Figure 3 shows desire-lines and that they will take various forms in detailed planning, including those elements included in the station scope.</li> </ul> <p>21. Page 7 – 3.1 Local Character (Old Town Centre and New Town Centre) – Shaded areas, on Figure 3, for Old Town Centre and the New Town Centre would help clarify the urban structure.</p> <p>22. Page 11 – R4.1.3: Inconsistent architectural styles with the theming of the LSP area, such as Tudor, Mediterranean, Santa Fe and Tuscan are not supported. – It is unclear whether there are enough market ready styles that would be acceptable under this guideline. Perhaps the examples of market ready styles can they be more visible in the policy to help the industry and aspiring home builders by more familiar local examples. The Shire should also consult with the METRONET Planning Manager Lisl Van Aarde to achieve a consistent architectural style and built form across the BRE Project Precinct and the broader LSP and LPP areas.</p> <p>23. Page 14 – Design Element 4.11 Outdoor Dining – Transperth's Bus Stop Design Guidelines include indicative exclusion zones demonstrated on various possible bus stop layouts. Consideration shall be given to all possible layouts to ensure passenger needs are met as designs for steps in these areas are yet to be determined.</p> <p>24. Page 14 – Design Element 4.12 Weather Protection – PTA's Bus Stop Design Guidelines need to be considered in LPP 3.8. The PTA's preferred minimum clearance from weather protection devices (bus shelters) is 1100mm particularly when a bus has to divert/swing into a bus location (i.e. bus embayment) where the front of the bus may temporarily encroach the verge space. PTA's absolute minimum clearance for weather protection devices (bus shelters) is 700mm.</p>	



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		<p>25. Page 15 – R4.8.2 - Buildings are constructed in accordance with AS 3671: Acoustics – Road Traffic Noise Intrusion, Building Siting and Construction and the State Planning Policy 5.4: Road and Rail Noise. – Future development and subdivision applications will require an acoustic assessment in accordance with SPP 5.4 and are to be undertaken by a suitably qualified professional.</p> <p>26. Page 16 – R4.10.2 - It is acknowledged that ground floor residential premises might require fencing to the street boundary and multiple use corridors. Where such fencing is required, it shall have a solid base not exceeding 0.5 metres in height and may have piers to a maximum height of 1.8 metres, with infill panels which are at least 50% visually permeable to allow facilitate passive surveillance. Green fencing is encouraged. – Development Applications (including subdivisions) adjacent to the railway reserve will require suitable fencing installed to the satisfaction of PTA.</p> <p>27. Page 17</p> <ul style="list-style-type: none"> <li>• R4.11.2 - Outdoor dining areas should be located so as not to interfere with car parking and vehicular movement. Dining furniture is not to be placed within 3.0 metres of any road corner bus stop or taxi stand.</li> <li>• R4.12.2 - All weather protection devices shall be located at first floor height at a minimum of 3.0 metres above finished pavement level. They may be raised at entries or lobbies to emphasise an entry point.</li> <li>• R4.12.3 - Weather protection devices shall not extend to within 600 millimetres of the road kerb.</li> </ul> <p>The Bus Stop Design Guidelines should be considered with the appropriate guidelines incorporated into the LPP 3.8. With regard to R4.11.2, the BSDG provide exclusion zones based on various possible bus stop layouts. Consideration should be given to all possible layouts as designs for steps in these areas are yet to be determined. As has been advised above the BSDG</p>	

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		<p>provide minimum clearances for weather protection with regards to R4.12.2 and R4.12.3.</p> <p>28. Page 20 – 4.1.6: Crime Prevention – Drafted Planning Guidelines: Safer Places by Design Crime Prevention Through Environmental Design should also be considered in LPP 3.8.</p> <p>29. Page 24 – Figure 11: Precinct Diagram – It is unclear whether the Figure reflects the overlapping role of the precincts/places.</p> <p>30. Page 30 – 5.3.1.5 Parking and Site Access - Any parking facilities in the rail reserve will be subject to PTA approval, shall be shared between uses and will be subject to potential conversion into Park &amp; Ride facilities in the future. – PTA legislation does not allow for reciprocal parking arrangements. As such this comment should be removed from LPP 3.5, to avoid creating unrealistic community expectations and in accordance with the Act.</p> <p>31. Page 31 – 5.4 Residential Precinct – All bus routes will be accessing the bus interchange through or along the northern edge of the mixed-use precinct north of Clara Street West. These routes will approach the station from both the north and south of the mixed-use precinct and converge along Sansimeon Boulevard to provide a higher level of service passing the higher density residential zoned precinct. However, while these stops may be an attractive option for some passengers the residential precinct is well within the walkable catchment of the station so it is likely that most residents will walk directly to access train services or the bus interchange.</p>	
R. Sharp IN22/21271	3.	<p>I don't wish to respond with your online form. However, I do want to comment on the proposed plan.</p> <p>Although I like your overall plan and design, I fear that you have neglected our aging population.</p>	<p>Universal access for people with ranging abilities is essential to create a Town Centre that is accessible for all. Local Planning Policy 3.8 – Built Form Guidelines references the need for universal and safe access to be provided to ensure that the Town Centre is accessible to all. Design Element</p>

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		<p>I have several disabled people in my family – both old and young. I cannot see any provision in your Plan for their mobility. Using walkers or gophers, they need safe, wide paths on which to travel. Cycleways are too risky and footpaths are too narrow. Please consider disabilities when designing your parks and thoroughfares.</p>	<p>4.7 in particular ensures that development includes universal access.</p> <p>In addition, Local Planning Policy 3.5 – Public Realm Guidelines includes Policy Requirements for areas of the public realm to provide universal access. 4.8.1 provides examples for safe pedestrian access and highlights the importance, need and requirement for universal access. A modification to 4.8.1 has been proposed to further require the need for universal, safe and prioritised access for all mobility levels of users.</p> <p>Furthermore, the Shire is currently in the process of preparing an updated Disability Access and Inclusion Plan (DAIP) 2323 – 2028 to ensure, amongst other things, that universal access is provided.</p>