

**ATTACHMENT NO 1 - SCHEDULE OF SUBMISSIONS
CHINATOWN OLD BROOME PRECINCT STRCUTRE PLAN**

No.	Submitter	Summary of Submission	Local Government Response	Local Government Recommendation
1.	Agnus Turner	<p>I would like to offer support of the plans to improve density and allow more people to reside and mixed use for Old Broome Residential. Given environmental pressures and needs urban infill in a very stretched residential market, I think these changes will be helpful.</p> <p>I am an owner of 45 Walcott St and happy for the changes proposed below: Old Broome residential</p> <p>Numerous properties on Weld, Robinson, Barker and Stewart Streets are rezoned from Mixed Use to Residential (R30 and R50) to consolidate mixed use development along the Hamersley / Robinson Street north-south spine, and to promote infill development.</p> <p>Numerous properties rezoned from Residential (R10) to Residential (R30 and R50) to support future infill development.</p>	Submission’s support for the project is noted.	<p>That the submission be noted.</p> <p>No change recommended.</p>
2.	Maxine Clark	I write to formally object to the proposed changes to the Old Broome Precinct Structure Plan that would increase the number of dwellings in the area. My concerns are based on several critical issues, which I outline below:	<p>The concerns regarding potential impacts of infill development as a result of the COBPSP are noted.</p> <p>The background reporting has demonstrated that with the proposed zoning changes, the precinct could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares in the precinct. It is important to note that this capacity analysis assumes that all identified lots are developed to their full potential which would take many years to occur, if at all, as it relies on the activity of private landowners.</p>	<p>That the submission be noted.</p> <p>No change recommended.</p>

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		<p>a. Existing Parking and Traffic Issues Old Broome already faces significant parking and traffic challenges, particularly around key locations such as Broome Primary School, the hospital, the Staircase to the Moon viewing area, and the weekend markets. Increasing the number of dwellings will exacerbate these problems, creating further congestion and safety concerns for both residents and visitors.</p> <p>b. Ageing Infrastructure The infrastructure in Old Broome is already under strain, with water pipes frequently bursting or experiencing low pressure. An increase</p>	<p>The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire’s Local Planning Strategy.</p> <p>Responses to individual issues are provided below:</p> <p>a. Existing Parking and Traffic Issues</p> <p>Regarding parking issues around key locations such as the hospital and school, the PSP acknowledges these issues and identifies in Part 1 (P1-Table 5) that the Western Australian Country Health Service is required to develop a Parking Management Strategy for this area as a short-term action. The Shire will continue to advocate for improvements in these key locations.</p> <p>The Traffic Impact Assessment has determined that even in a maximum build out scenario the majority of roads will be able to cope with additional traffic flows. All new residential parking is required to be accommodated on site and in limited circumstances, parking for mixed use development may be developed in the verges in line with the Shire’s existing 5.6 Local Planning Policy – Parking.</p> <p>b. Ageing Infrastructure Existing infrastructure issues highlight the need for investment and renewal, which can be supported by</p>	

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		<p>in dwellings will place additional pressure on these systems, leading to higher maintenance costs and potential service disruptions. Street lighting is also insufficient in many areas, raising safety concerns that would be worsened by higher population density.</p> <p>c. Environmental Concerns Old Broome is significantly hotter behind the Mangrove Hill due to reduced airflow and shading. Adding two-storey dwellings will amplify the urban heat effect, making the area less liveable and environmentally sustainable.</p> <p>d. Increased Rubbish and Waste Management Challenges Higher population density will result in more waste, which could overwhelm the current waste management infrastructure and negatively impact the cleanliness and appeal of the area. The increase in waste will likely find its way into Roebuck Bay, posing a significant threat to its already fragile and unique ecosystem.</p> <p>e. Loss of Historic and Cultural Character Old Broome is one of the few original town settlements remaining, and its unique character and charm are integral to its appeal for both residents and visitors.</p>	<p>infill development. The Water Corporation have confirmed that no upgrades will be required to their infrastructure as a result of increase in densities proposed through the Precinct Structure Plan and existing customers will not be impacted. Upgrades to street lighting will be considered as part of future streetscape upgrades.</p> <p>c. Environmental Concerns Two storey dwellings are already permitted in the COBPSP area per the requirements of the Residential Design Codes (Volume 1 and 2). This is not proposed to change.</p> <p>d. Increased Rubbish and Waste Management The COBPSP provides a framework which enables infill development to occur. This will take many years to occur. The Shire is well equipped to manage it's waste operations equal to this growth. Further, larger development will be required to prepare Waste Management Plans under the COBPSP.</p> <p>e. Loss of Historic and Cultural Character / Local Vegetation Increased density does not necessarily mean losing Old Broome's historic charm. The COBPSP promotes sensitive infill development which seeks to retain the character of Old Broome by requiring new buildings to align with stricter landscape controls (compared to what exists today). Regarding built</p>	

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		<p>Replacing old-style houses and vegetation with overpopulated, modern developments would irreversibly damage the area's historical and cultural significance.</p> <p>The charm of Old Broome is a key draw for tourism, which supports the local economy. Preserving its heritage is vital for maintaining this appeal.</p> <p>f. Impact on Local Vegetation and Aesthetics The removal of mature vegetation to accommodate more dwellings would further diminish the area's natural beauty, increase temperatures, and reduce shade for residents and wildlife.</p> <p>In conclusion, I strongly urge the Council to reconsider this proposal. Instead of increasing density, I recommend implementing planning guidelines that focus on preserving the history, character, and environment of Old Broome for future generations.</p>	<p>heritage, heritage listed properties are protected through the Shire's Local Planning Scheme.</p> <p>f. Impact on Local Vegetation and Aesthetics A key principle of the COPSP is to promote that a prominent tree canopy can be maintained. It is acknowledged that with redevelopment some trees may be lost in the short-term, however, the planning framework includes landscape and open space controls which will ensure that new development is supported by planting of trees.</p>	
3.	Greg Clark	<p>I am writing to formally object to the proposed changes to the zoning codes in Old Broome. As a long-term resident who purchased a home in the area in 2002, I am deeply concerned about the impact these changes will have on our community, infrastructure, and the unique character of the area.</p>	<p>The concerns regarding potential impacts of infill development as a result of the COBPSP are noted.</p> <p>The background reporting has demonstrated that with the proposed zoning changes, the precinct could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares precinct. It is important to note that this capacity analysis assumes that all identified lots are developed to their full potential which would take many years to occur, if at all as it relies on the activity of private landowners.</p>	<p>That the submission be noted.</p> <p>No change recommended.</p>

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		<p>a. Traffic Congestion, Safety Risks and Parking Old Broome already experiences significant traffic congestion, particularly near Broome Primary School and the hospital. Increasing the population density in this area will make these issues far worse, creating unsafe conditions for children walking or riding their bikes to and from school. As traffic worsens, parents may feel compelled to drive their children, further contributing to congestion.</p> <p>Parking is already insufficient in critical areas, including near the school and hospital. Additional residents and visitors brought by higher-density development will exacerbate these shortages, increasing frustration and making daily life more difficult for everyone in the area.</p> <p>b. Ageing Infrastructure The infrastructure in Old Broome is not capable of supporting increased density. Roads, water, and drainage systems are aging and already under strain. These systems were not designed to handle the</p>	<p>The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire’s Local Planning Strategy.</p> <p>Responses to individual issues are provided below:</p> <p>a. Traffic Congestion, Safety Risks and Parking The Traffic Impact Assessment has determined that even in a maximum built out scenario the majority of roads will be able to cope with the additional traffic flows. All new parking is encouraged to be accommodated on-site, however, the Shire already has a policy which allows consideration of verge parking for Mixed Use development, only if design principles can be achieved.</p> <p>Regarding parking issues around key locations such as the hospital and school, these are independent issues which the Shire are aware of. The PSP acknowledges these issues and identifies in Part 1 (P1-Table 5) that the Western Australian Country Health Service is required to develop a Parking Management Strategy for this area as a short-term action.</p> <p>b. Ageing Infrastructure Existing infrastructure issues highlight the need for investment and renewal, which can be supported by</p>	

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		<p>demands of high-density living, and without substantial and costly upgrades, they will fail to meet the needs of the community.</p> <p>c. Preservation of Low-Density Living I chose to live in Old Broome because of the low-density lifestyle it offers. This area provides space, tranquillity, and a strong sense of community that would be irreparably damaged by high-density development. Residents value the unique feel of the area, which stands in stark contrast to newer, more densely populated developments.</p> <p>d. Protection of Historical and Cultural Heritage Old Broome is one of the last original townships in Western Australia that has not been overdeveloped. Broome Primary School, one of the oldest schools in the state, and many historic buildings define the character of this area. Replacing older homes with modern high density housing will destroy the heritage and charm that both residents and visitors cherish.</p> <p>e. Alternative Development Areas There is ample opportunity for development in other areas, such as Cable Beach, Roebuck Estate, and Broome North. These areas can accommodate the town's growth without compromising Old Broome's unique character or placing undue stress on its infrastructure and residents.</p>	<p>infill development. The Water Corporation have confirmed that no upgrades will be required to their infrastructure as a result of increase in densities proposed through the Precinct Structure Plan and existing customers will not be impacted. See comments above in relation to roads.</p> <p>c. Preservation of Low-Density Living Increased density does not necessarily mean losing Old Broome's historic charm. The COBPSP promotes sensitive infill development which seeks to retain the character of Old Broome by requiring new buildings to align with stricter landscape controls (compared to what exists today). Regarding built heritage, heritage listed properties are protected by through the Shire's Local Planning Scheme.</p> <p>d. Protection of Historical and Cultural Heritage. Refer to comments above.</p> <p>e. Alternative Development Areas Through its draft Local Planning Strategy, the Shire has carefully considered all alternative locations for future urban growth. Cable Beach and Broome North are already earmarked for future growth, while Roebuck Estate has limited remaining</p>	

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		<p>f. Consideration for Granny Flats</p> <p>As an alternative to high-density developments, I suggest that the Shire consider reducing some regulations to allow property owners with large blocks to add granny flats. This would provide residents with a more flexible and community-friendly way to adapt to changing family needs-whether to care for aging parents, support adult children, or create a home office. Such an approach would encourage sustainable growth while preserving Old Broome' s low-density charm.</p> <p>In conclusion, I strongly urge the Shire to reconsider the proposed zoning changes and explore more balanced solutions. Increased density will create unsafe conditions for children, overwhelm aging infrastructure, and permanently alter the low-density charm and historical significance of Old Broome. Thoughtful alternatives like the inclusion of granny flats can help meet the needs of the community without sacrificing its character.</p> <p>Thank you for considering this submission. I trust the Shire will prioritize the well-being of its residents and the preservation of Old Broome's unique character in its decision-making process.</p>	<p>development capacity. The benefit of the COBPSP is that it provides a short-medium term opportunities for accommodating growth, in areas which can make better use of existing infrastructure.</p> <p>f. Consideration for Granny Flats</p> <p>Under the recently gazetted R-Codes Volume 1, the State Government has provided much greater flexibility on ancillary dwellings (granny flats). This is a position which has not been altered through the PSP.</p>	
4.	Argyle Cattle Company Pty Ltd	<p>Introduction/Context</p> <p>This submission is made on behalf Daiquiri Nominees Pty Ltd, which is the registered proprietor of properties at 22 Weld Street and 10</p>	The intent of the submission is acknowledged and understood. One of the primary drivers of rezoning the subject sites (and surrounding areas) from Mixed Use and Residential was to consolidate	That the submission be noted.

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		<p>Barker Street, Broome which are located within and affected by the proposed Chinatown-Old Broome Precinct Structure Plan. Daiquiri was advised by letters dated 30 September 2024 from the Shire of Broome that the new Precinct Structure Plan under consideration for the Chinatown-Old Broome areas would, if approved in full, effect a zoning change for the above properties from Mixed Use R10 to Residential R30. The Shire has invited submissions in respect of the draft PSP with a deadline on 2 December 2024.</p> <p>Daiquiri Nominees makes the following submissions with respect to the zoning changes that are proposed in the draft PSP and argues that the current Mixed Use R10 zoning should be retained. Daiquiri Nominees submits that the current Mixed Use R10 zoning should be retained for the properties for reasons which include the following:</p> <p>Heritage Listing Both house and garden at 22 Weld Street are Heritage listed under the WA <i>Heritage Act</i> and are listed on the municipal heritage register of the Shire of Broome, as McDaniel Homestead. The property is one of the oldest and best preserved of the remaining historic pearling masters' residences in Broome and is substantially unchanged structurally since it was constructed in the early 20th century.</p> <p>The Shire of Broome heritage registration can be found at https://inherit.dplh.wa.gov.au/public/inventory/details/7d7edad0-1fbc-4bd4-9325-902986d4e76b . The Heritage WA register assessment documentation can be found at https://inherit.dplh.wa.gov.au/Admin/api/file/bf62ca0b-c344-9441-</p>	<p>mixed-use and commercial activity along Hamersley / Robinson Streets adjacent to Roebuck Bay and Town Beach.</p> <p>The costs required to upkeep the property to a standard befitting the site's State Heritage Register status is acknowledged, along with the limitations that a residential zoning may have on adaptive reuse.</p> <p>Notwithstanding the above, the Shire maintains its position that consolidating commercial / mixed use development on Hamersley Street is still the preferred outcome. A spot rezoning of this site, or rezoning the surrounding area to Mixed Use is not a desired outcome.</p> <p>However, given the unique circumstances of this site and reasons presented by the submitter, the Shire proposes an alternate solution which is to define an 'Additional Use' over the site which allows for the following uses as defined in the Shire's Local Planning Scheme No.7:</p> <ul style="list-style-type: none"> • Art Gallery, • Cinema/Theatre, • Community Purpose, • Consulting Rooms, • Market, • Reception Centre, 	<p>P1-Figure 2 Structure Plan Map</p> <p>Figures modified to show Additional Use for Lot 92 (No. 22) Weld Street and Lot 193 (No. 10) Barker Street as an additional use.</p>

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		<p>5bfc-55c288cf4e44 . 10 Barker St is occupied and used in conjunction with 22 Weld Street as a single property, comprising a natural and spacious extension to the Weld Street garden with mature trees, including an established Boab, and a tennis court which adjoins the historic garden.</p> <p>Mixed Use zoning consistent with objectives of the WA Heritage Act The objectives of the <i>Heritage Act</i> include the following:</p> <p><i>Section 3(d) to encourage and facilitate the conservation, continuing use, development and adaptive reuse of places of cultural heritage significance in ways that represent high standards of heritage conservation and are in harmony with cultural heritage values. (emphasis added).</i></p> <p>Retention of the property's Mixed Use zoning permits appropriate land-uses, development and adaptive reuse of the property consistent with this objective, whereas a R30 zoning focusing predominantly on an intensification of residential uses will not.</p> <p>Possible reuses The current Mixed Use zoning subject to development approval from the Shire of Broome, permits low impact non-residential use of the property, consistent with its heritage character. This includes a variety of uses such as a restaurant, a reception centre, art or exhibition gallery or for boutique shopping (possibly in conjunction with the Court House market). The synthetic tennis court would work well in conjunction with use of the properties for receptions.</p>	<ul style="list-style-type: none"> • Recreation – private, • Restaurant/café, • Small bar. 	

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		<p>Potential for restoration and conservation costs to be offset by income generated from adaptive reuses of the property While under the <i>Heritage Act</i> the Heritage Council has limited power to make repair orders where <i>'as a consequence of neglect, works are required to prevent irreversible deterioration'</i> of a property, the Heritage Council has no power to order the conservation or maintenance of a heritage property.</p> <p>It is recognised by the WA Heritage Council that restoration, conservation and maintenance of heritage properties will generally involve considerable ongoing expense, and that permitting appropriate commercial use of a heritage property can help offset conservation costs and encourage owners to undertake conservation and maintenance works.</p> <p>Since purchasing the properties in 2022, the owner has undertaken, at its own expense, extensive restoration, and conservation works in relation to both the buildings and the gardens. Continuing conservation and maintenance constitutes a substantial ongoing financial cost, not least for example in keeping water up to the large garden.</p> <p>Retention of a Mixed Use zoning means that here is an ongoing potential for the current and future owners to generate commercial income from the property to help offset the substantial cost of maintaining the property in a manner consistent with its heritage value.</p> <p>R30 Zoning inappropriate for this site The proposed new R30 zoning for much of Old Broome is designed we understand, to reflect the current residential use of much of the</p>		

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		<p>land, and at least in part, to relieve housing shortages in Broome by encouraging greater residential density development close to the Town Centre.</p> <p>R30 zoning is inappropriate for the site in circumstances where the buildings and gardens are Grade A Heritage listed, and where it is most unlikely that Heritage WA or Shire of Broome would permit planning approval for residential infill housing as the highest and best use of the property By contrast the current Mixed Use R10 zoning facilitates sympathetic commercial uses while not incentivising excessive redevelopment of the land at the higher density coding.</p> <p>Location close to commercial precincts The property is located close to other mixed use and commercial use areas along Hammersley St and is close to the heritage listed historic Court House site which is used for a range of community purposes including the weekend Court House market. In this respect McDaniel Homestead has natural synergies with the historic core and the non-residential activity that occurs in the prevailing area.</p> <p>No appreciable benefit from a change of zoning The property is currently used for residential purposes only. While the owner has no immediate intention to seek development approval for an alternative use, there is no benefit or utility in changing the zoning to R30, which would preclude alternative uses, including those listed above, without securing any discernible planning advantage. As noted, limiting the potential scope of activities on the site where these are consistent with the properties heritage character as well as upzoning the land for residential</p>		

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		<p>development is counterproductive to the long term retention of its heritage character</p> <p>Public access to heritage site The advantages in preserving the ability to put the property to alternative non-residential uses includes the potential to use the property in a way that would facilitate public access to the site and in this way showcase an important heritage asset to local Broome residents and to visitors. By contrast, a residential zoning would effectively lock the property up for use and access only by its residents.</p> <p>Any alternative use subject to development approval A Mixed Use zoning does not permit development or adaptive reuse as of right. Any use other than for home or home office occupation, will be subject to the Shire of Broome granting development approval. In this sense a Mixed Use R10 zoning retains protections for the property’s heritage characteristics that prevent it from being put to inappropriate use.</p> <p>Conclusion For the reasons that have been outlined, it is submitted that the proposed Chinatown-Old Broome PSP be amended to remove the proposed zone changes for 22 Weld Street and 10 Barker Street, Broome and that the properties retain their Mixed Use R10 zoning. We welcome further discussion with the Shire in relation to this submission to ensure a suitable zoning outcome for these historic properties.</p>		

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5.	Hudson McKenna	<p>I am writing to formerly object to the proposed zoning change for my property at 1/3 Chapple Street, Broome, under the above mentioned plan. Specifically, I strongly oppose the rezoning of my privately owned land from Regional Centre (R50) to Residential (R10).</p> <p>This rezoning will have significant negative implications for the use, value, and development potential of the property. The current Regional Centre (R50) zoning permits a range of commercial uses, which are critical to maintaining the economic viability and flexibility of the site. By rezoning the property to (R10), the proposed plan removes its commercial potential entirely, limiting its use to low- density residential purposes. This change significantly undermines the property's current and future functionally, particularly in light of its strategic location</p> <p>Furthermore, this rezoning constitutes a serious restriction on my rights as a landowner, significantly diminishing the flexibility and value of my property. The reduction in zoning density and the removal of commercial use options will adversely affect the property's economic potential. Such a change directly results in injurious affection, entitling me to claim compensation under relevant planning and compensation legislation.</p> <p>The proposed change does not appear to adequately consider the broader implications for landowners or the surrounding precinct. The loss of commercial zoning for this property contradicts the intent to foster a vibrant and functional regional hub, which relies on maintaining areas of mixed-use development.</p>	<p>The Shire acknowledges the concerns raised regarding the proposed rezoning of this property from Regional Centre (R50) to Residential (R10).</p> <p>The reasoning behind this rezoning is based on the findings of the Shire's 2017 Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) and the associated risks posed by coastal erosion and inundation north of Gray Street, including the area encompassing this property.</p> <p>Coastal Erosion Risks and Land Use Planning The CHRMAP identifies areas at risk of coastal processes (erosion and inundation) and provides guidance on land use planning to minimise potential future impacts on property, infrastructure, and public safety. Modelling shows that the area north of Gray Street, where this property is located, is at heightened risk of coastal processes over the medium to long term.</p> <p>The CHRMAP does not earmark this portion of Chinatown for coastal protection measures.</p> <p>The Amendment therefore sought to rezone the land to limit intensification of land uses, including higher-density residential and commercial activities, which would exacerbate the risks to both private properties and public infrastructure in the future.</p> <p>Rationale for Rezoning</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p> <p>Figures modified to change zoning of Lot 2080 (No. 6) Gray Street, Lot 2080 (No. 6) Gray Street, Lot 2079 (No 1) Chapple Street, Lot 3 (No. 3) Chapple Street, Lot 100 (No. 6) Chapple Street, Lot 484 (No. 2) Chapple Street, Lot 10 (No 2078) Chapple Street and Lot 2077 (No 12) Chapple Street, from 'Residential R10' to 'Regional Centre'.</p>

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		<p>I respectfully request that the Shire of Broome reconsider the rezoning of my property at 1/3 Chapple Street and retain the current Regional Centre (RSO) zoning. This zoning better reflects the property's current and potential use and aligns with the broader goals of promoting economic and community activity in the Chinatown precinct.</p>	<p>Rezoning these properties to Residential (R10) reflects a precautionary approach to planning, ensuring that land use intensity aligns with the identified erosion and inundation risks.</p> <p>However, it is noted that a review of the CHRMAP is being undertaken. Rezoning of the sites in advance of the CHRMAP review would be premature.</p> <p>It should be noted that the sites in question would have to address coastal planning constraints which is likely to limit redevelopment opportunities, regardless of the zoning.</p> <p>Summary Submission request to retain the Regional Centre zoning over the site is supported.</p>	
6.	Melanie Sawyer and Cody Sawyer	<p>I am writing to formally object to the proposed zoning change for my property at 6/3 Chapple Street, Broome, under the above mentioned plan. Specifically, I strongly oppose the rezoning of my privately owned land from Regional Centre (R50) to Residential (R10).</p> <p>This rezoning will have significant negative implications for the use, value, and development potential of the property. The current Regional Centre (R50) zoning permits a range of commercial uses, which are critical to maintaining the economic viability and flexibility of the site. By rezoning the property to Residential (R10), the proposed plan removes its commercial potential entirely, limiting its</p>	<p>The Shire acknowledges the concerns raised regarding the proposed rezoning of this property from Regional Centre (R50) to Residential (R10).</p> <p>The reasoning behind this rezoning is based on the findings of the Shire's 2017 Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) and the associated risks posed by coastal erosion and inundation north of Gray Street, including the area encompassing this property.</p> <p>Coastal Erosion Risks and Land Use Planning</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p> <p>Figures modified to change zoning of Lot 2080 (No. 6) Gray Street, Lot 2080 (No.</p>

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		<p>use to low-density residential purposes. This change significantly undermines the property's current and future functionality, particularly in light of its strategic location.</p> <p>Furthermore, this rezoning constitutes a serious restriction on my rights as a landowner, significantly diminishing the flexibility and value of my property. The reduction in zoning density and the removal of commercial use options will adversely affect the property's economic potential. Such a change directly results in injurious affection, entitling me to claim compensation under relevant planning and compensation legislation.</p> <p>The proposed change does not appear to adequately consider the broader implications for landowners or the surrounding precinct. The loss of commercial zoning for this property contradicts the intent to foster a vibrant and functional regional hub, which relies on maintaining areas of mixed-use development.</p> <p>I respectfully request that the Shire of Broome reconsider the rezoning of my property at 1/3 Chapple Street and retain the current Regional Centre (R50) zoning. This zoning better reflects the property's current and potential use and aligns with the broader goals of promoting economic and community activity in the Chinatown precinct.</p>	<p>The CHRMAP identifies areas at risk of coastal processes (erosion and inundation) and provides guidance on land use planning to minimise potential future impacts on property, infrastructure, and public safety. Modelling shows that the area north of Gray Street, where this property is located, is at heightened risk of coastal processes over the medium to long term.</p> <p>The CHRMAP does not earmark this portion of Chinatown for coastal protection measures.</p> <p>The Amendment therefore sought to rezone the land to limit intensification of land uses, including higher-density residential and commercial activities, which would exacerbate the risks to both private properties and public infrastructure in the future.</p> <p>Rationale for Rezoning Rezoning these properties to Residential (R10) reflects a precautionary approach to planning, ensuring that land use intensity aligns with the identified erosion and inundation risks.</p> <p>However, it is noted that a review of the CHRMAP is being undertaken. Rezoning of the sites in advance of the CHRMAP review would be premature.</p> <p>It should be noted that the sites in question would have to address coastal planning constraints which</p>	<p>6) Gray Street, Lot 2079 (No 1) Chapple Street, Lot 3 (No. 3) Chapple Street, Lot 100 (No. 6) Chapple Street, Lot 484 (No. 2) Chapple Street, Lot 10 (No 2078) Chapple Street and Lot 2077 (No 12) Chapple Street, from 'Residential R10' to 'Regional Centre'.</p>

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			<p>is likely to limit redevelopment opportunities, regardless of the zoning.</p> <p>Summary Submission request to retain the Regional Centre zoning over the site is supported.</p>	
7.	Mariesa Crowder	<p>I am writing to formally object to the proposed zoning change for my property at 7/3 Chapple Street, Broome, under the above mentioned plan. Specifically, I strongly oppose the rezoning of my privately owned land from Regional Centre (R50) to Residential (R10).</p> <p>This rezoning will have significant negative implications for the use, value, and development potential of the property. The current Regional Centre (R50) zoning permits a range of commercial uses, which are critical to maintaining the economic viability and flexibility of the site. By rezoning the property to Residential (R10), the proposed plan removes its commercial potential entirely, limiting its use to low-density residential purposes. This change significantly undermines the property's current and future functionality, particularly in light of its strategic location.</p> <p>Furthermore, this rezoning constitutes a serious restriction on my rights as a landowner, significantly diminishing the flexibility and value of my property. The reduction in zoning density and the removal of commercial use options will adversely affect the property's economic potential. Such a change directly results in injurious affection, entitling me to claim compensation under relevant planning and compensation legislation.</p> <p>The proposed change does not appear to adequately consider the broader implications for landowners or the surrounding precinct.</p>	<p>The Shire acknowledges the concerns raised regarding the proposed rezoning of this property from Regional Centre (R50) to Residential (R10).</p> <p>The reasoning behind this rezoning is based on the findings of the Shire's 2017 Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) and the associated risks posed by coastal erosion and inundation north of Gray Street, including the area encompassing this property.</p> <p>Coastal Erosion Risks and Land Use Planning The CHRMAP identifies areas at risk of coastal processes (erosion and inundation) and provides guidance on land use planning to minimise potential future impacts on property, infrastructure, and public safety. Modelling shows that the area north of Gray Street, where this property is located, is at heightened risk of coastal processes over the medium to long term.</p> <p>The CHRMAP does not earmark this portion of Chinatown for coastal protection measures.</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p> <p>Figures modified to change zoning of Lot 2080 (No. 6) Gray Street, Lot 2080 (No. 6) Gray Street, Lot 2079 (No 1) Chapple Street, Lot 3 (No. 3) Chapple Street, Lot 100 (No. 6) Chapple Street, Lot 484 (No. 2) Chapple Street, Lot 10 (No 2078) Chapple Street and Lot 2077 (No 12) Chapple Street, from 'Residential R10' to 'Regional Centre'.</p>

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		<p>The loss of commercial zoning for this property contradicts the intent to foster a vibrant and functional regional hub, which relies on maintaining areas of mixed-use development.</p> <p>I respectfully request that the Shire of Broome reconsider the rezoning of my property at 7/3 Chapple Street and retain the current Regional Centre (R50) zoning. This zoning better reflects the property's current and potential use and aligns with the broader goals of promoting economic and community activity in the Chinatown precinct.</p>	<p>The Amendment therefore sought to rezone the land to limit intensification of land uses, including higher-density residential and commercial activities, which would exacerbate the risks to both private properties and public infrastructure in the future.</p> <p>Rationale for Rezoning Rezoning these properties to Residential (R10) reflects a precautionary approach to planning, ensuring that land use intensity aligns with the identified erosion and inundation risks.</p> <p>However, it is noted that a review of the CHRMAP is being undertaken. Rezoning of the sites in advance of the CHRMAP review would be premature.</p> <p>It should be noted that the sites in question would have to address coastal planning constraints which is likely to limit redevelopment opportunities, regardless of the zoning.</p> <p>Summary Submission request to retain the Regional Centre zoning over the site is supported.</p>	
8.	Lisa Pelosi	<p>Having owned 4 Mary Street for 24 years I have seen many changes to Broome, the saving grace I believe has been the sensible decision making in the past years to implement and retain the R10 zoning to the Old Broome precinct. I can understand that with the</p>	<p>The concerns regarding potential impacts of infill development as a result of the COBPSP zoning changes are noted.</p>	<p>The submission be noted. No change recommended.</p>

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		<p>ever increasing population there is a need to develop Broome of course there is but I also believe that without the character of the wide streets, old trees and big blocks within the Old Broome precinct you destroy what represents the uniqueness and history that makes Broome so popular!</p> <p>Why can't we continue developing the new areas and leave the gorgeous character filled streets in Old Broome alone. These changes to the zoning will absolutely ruin the area, it encourages the destruction of old buildings and will result in Broome being the same as any other town in Australia which has lost its soul and appeal to those who visit. You hear it time and time again, people lamenting about what was before and how it was a mistake to have knocked things down, creating building upon building.</p> <p>The change you are suggesting reminds me of the stories I heard about Lord Macalpine saving the Old Broome buildings in the day against the wishes of those whose shortsightedness would have had us destroy buildings such as the current Matsos Brewery for example. The Old Broome buildings that we and many visitors to the area marvel at and luxuriate amongst today. Please, please don't allow these zoning changes to go through so in the future your children and grandchildren only get to read about a town called Broome in the Kimberley that used to have character.</p>	<p>The background reporting has demonstrated that with the proposed zoning changes, the precinct could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares precinct. The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire's Local Planning Strategy.</p> <p>Through its draft Local Planning Strategy, the Shire has carefully considered all alternative locations for future urban growth with multiple opportunities identified. The benefit of the COBPSP is that it provides a short-medium term opportunities for housing growth, in areas which can make better use of existing infrastructure.</p> <p>Extent of Zoning Changes Regarding the extent of the rezoning, of the 146 properties identified as being R10 (currently):</p> <ul style="list-style-type: none"> • 69 Properties are retained as R10 (47%) • 51 Properties are zoned from R10 to R30 (35%) • 26 Properties are zoned from R10 to R50 (18%) <p>The Shire has adopted a balanced approach, with the areas being upcoded proposed primarily east of Walcott Street.</p>	

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			<p>Character Protection The concerns around how future development will impact on landscape character are understood. The following points are provided:</p> <ul style="list-style-type: none"> • The Structure Plan once approved will be a Western Australian Planning Commission endorsed document. The document will provide stronger guidance than the existing framework which has seen individual sites in the Old Broome Special Character Area spot rezoned and R-Code compliant solutions delivered which have removed trees and provided minimal landscaping. • A key principle of the COBPSP is to maintain the prominent tree canopy. It is acknowledged that with redevelopment some trees may be lost in the short-term, however, the planning framework includes landscape and open space controls which will ensure that new development is supported by planting of trees. • Contemporary planning systems are supported by design review and other mechanisms to ensure design quality is at the forefront of good planning decisions. The Shire has a Design Review Policy in place and relevant proposals will be referred to the Design Review Panel to ensure the integrity of the COBPSP planning controls are maintained. 	

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			<p>Finally, the R-Codes Volume 1 (which will apply throughout the COBPSP) were updated in 2024. The base standard of medium density development is expected to improve as a result, with substantially greater emphasis now placed on sensitive infill development which is conscious of its individual site and surrounding context.</p>	
9.	Valerie Burgess	<p>I have lived in Broome for 18 years - the majority of them in Walcott St and have raised a child here. The value of this place to me comes from the very special character of this Old Broome area, quiet streets, large blocks with lush gardens, plenty of breezeway and above all low density housing. The special character of this area comes not just from the history and heritage of many of the older houses in this area, but also from the ambience defined by the R10 blocks, which allows for green, leafy gardens with large trees, verges and breezeways. It is admired by tourists and visitors who come to this area and recognise that this place is something really special.</p> <p>Increasing the density of housing in this one area of Broome that epitomises the history and character of this incredibly special place is incredibly short-sighted. If you get this wrong you will lose yet more of the unique character of Broome. The area defined as the Old Broome special character area should be retained as a R10 zone. Please help preserve this area, not destroy it.</p>	<p>The concerns regarding potential impacts of infill development as a result of the COBPSP zoning changes are noted.</p> <p>The background reporting has demonstrated that with the proposed zoning changes, the precinct could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares precinct. The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire’s Local Planning Strategy. Through its draft Local Planning Strategy, the Shire has carefully considered all alternative locations for future urban growth with multiple opportunities identified. The benefit of the COBPSP is that it provides a short-medium term opportunities for housing growth, in areas which can make better use of existing infrastructure.</p> <p>Extent of Zoning Changes Regarding the extent of the rezoning, of the 146 properties identified as being R10 (currently):</p> <ul style="list-style-type: none"> 69 Properties are retained as R10 (47%) 	<p>That the submission be noted.</p> <p>No change recommended.</p>

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			<ul style="list-style-type: none"> • 51 Properties are zoned from R10 to R30 (35%) • 26 Properties are zoned from R10 to R50 (18%) <p>The Shire has tried to ensure a balanced approach, with the areas being upcoded proposed primarily east of Walcott Street.</p> <p>Character Protection The concerns around how future development will impact on existing character are understood. The following points are provided:</p> <p>The concerns around how future development will impact on landscape character are understood. The following points are provided:</p> <ul style="list-style-type: none"> • The Structure Plan once approved will be a Western Australian Planning Commission endorsed document. The document will provide stronger guidance than the existing framework which has seen individual sites in the Old Broome Special Character Area spot rezoned and R-Code compliant solutions delivered which have removed trees and provided minimal landscaping. • A key principle of the COBPSP is to maintain the prominent tree canopy. It is acknowledged that with redevelopment some trees may be 	

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			<p>lost in the short-term, however, the planning framework includes landscape and open space controls which will ensure that new development is supported by planting of trees.</p> <ul style="list-style-type: none"> Contemporary planning systems are supported by design review and other mechanisms to ensure design quality is at the forefront of good planning decisions. The Shire has a Design Review Policy in place and relevant proposals will be referred to the Design Review Panel to ensure the integrity of the COBPSP planning controls are maintained. <p>Finally, the R-Codes Volume 1 (which will apply throughout the COBPSP) were updated in 2024. The base standard of medium density development is expected to improve as a result, with substantially greater emphasis now placed on sensitive infill development which is conscious of its individual site and surrounding context.</p>	
10	Andrew Grace and Sadie Prendergast	<p>I am writing to formally object to the proposed zoning change for my property at 1/3 Chapple Street, Broome, under the above-mentioned plan. Specifically, I strongly oppose the rezoning of my privately owned land from Regional Centre (R50) to Residential (R10).</p> <p>This rezoning will have significant negative implications for the use, value, and development potential of the property. The current Regional Centre (R50) zoning permits a range of</p>	<p>The Shire acknowledges the concerns raised regarding the proposed rezoning of this property from Regional Centre (R50) to Residential (R10).</p> <p>The reasoning behind this rezoning is based on the findings of the Shire’s 2017 Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) and the associated risks posed by coastal erosion and</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p>

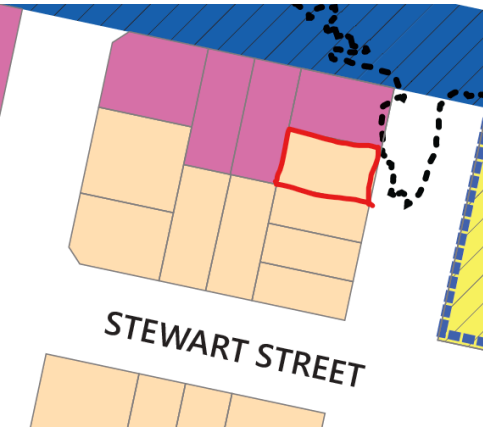
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		<p>commercial uses, which are critical to maintaining the economic viability and flexibility of the site. By rezoning the property to Residential (R10), the proposed plan removes its commercial potential entirely, limiting its use to low-density residential purposes. This change significantly undermines the property's current and future functionality, particularly in light of its strategic location.</p> <p>Furthermore, this rezoning constitutes a serious restriction on my rights as a landowner, significantly diminishing the flexibility and value of my property. The reduction in zoning density and the removal of commercial use options will adversely affect the property's economic potential. Such a change directly results in injurious affection, entitling me to claim compensation under relevant planning and compensation legislation.</p> <p>The proposed change does not appear to adequately consider the broader implications for landowners or the surrounding precinct. The loss of commercial zoning for this property contradicts the intent to foster a vibrant and functional regional hub, which relies on maintaining areas of mixed-use development.</p> <p>I respectfully request that the Shire of Broome reconsider the rezoning of my property at 1/3 Chapple Street and retain the current Regional Centre (R50) zoning. This zoning better reflects the property's current and potential use and aligns with the broader goals of promoting economic and community activity in the Chinatown precinct.</p>	<p>inundation north of Gray Street, including the area encompassing this property.</p> <p>Coastal Erosion Risks and Land Use Planning The CHRMAP identifies areas at risk of coastal processes (erosion and inundation) and provides guidance on land use planning to minimise potential future impacts on property, infrastructure, and public safety. Modelling shows that the area north of Gray Street, where this property is located, is at heightened risk of coastal processes over the medium to long term.</p> <p>The CHRMAP does not earmark this portion of Chinatown for coastal protection measures.</p> <p>The Amendment therefore sought to rezone the land to limit intensification of land uses, including higher-density residential and commercial activities, which would exacerbate the risks to both private properties and public infrastructure in the future.</p> <p>Rationale for Rezoning Rezoning these properties to Residential (R10) reflects a precautionary approach to planning, ensuring that land use intensity aligns with the identified erosion and inundation risks.</p> <p>However, it is noted that a review of the CHRMAP is being undertaken. Rezoning of the sites in advance of the CHRMAP review would be premature.</p>	<p>Figures modified to change zoning of Lot 2080 (No. 6) Gray Street, Lot 2080 (No. 6) Gray Street, Lot 2079 (No 1) Chapple Street, Lot 3 (No. 3) Chapple Street, Lot 100 (No. 6) Chapple Street, Lot 484 (No. 2) Chapple Street, Lot 10 (No 2078) Chapple Street and Lot 2077 (No 12) Chapple Street, from 'Residential R10' to 'Regional Centre'.</p>

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			<p>It should be noted that the sites in question would have to address coastal planning constraints which is likely to limit redevelopment opportunities, regardless of the zoning.</p> <p>Summary Submission request to retain the Regional Centre zoning over the site is supported.</p>	
11	Kelly Woodley	<p>We have plans to build commercial & residential on our block at 10 Weld St. The Shire is proposing a change of our block zoning from mixed use to residential. The reason we purchased this block was because it is zoned as mixed use, as we had plans to build commercially, so we do not accept a change to the zoning. We will be at a financial loss if the zoning changes to residential only. I will attach our current building plans, and forward them to the Shire's email. It shows commercial space and multi residential space, in the new proposed buildings.</p>	<p>The intent of the submission is acknowledged and understood. One of the primary drivers of rezoning the subject sites (and surrounding areas) from mixed use to residential was to consolidate mixed-use and commercial activity along Hamersley / Robinson Streets adjacent to Roebuck Bay and Town Beach.</p> <p>The Shire maintains its position that consolidating commercial / mixed use development on Hamersley Street is still the preferred outcome. However, given the location of this site and the fact that its boundaries align with mixed use properties at 29-31 Frederick Street, its location adjacent to Court House, the Shire is supportive of changing this site back to a Mixed Use zone.</p> <p>As such, the Shire will recommend that the zoning for Lot 57 (10 Weld Street), should retain its existing mixed-use classification.</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p> <p>P1-Figure 11: Commercial Sub-Precinct Requirements</p> <p>Figures modified to change Lot 57 (No. 10) Weld Street from 'Residential R50' to 'Mixed Use R50'.</p>

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12	Claire Richards Rowe Group	<p>Rowe Group acts on behalf of the owners of Lot 203 (No. 6) Louis Street, Broome ('site'). The site is located within the boundaries of the Shire's draft Chinatown-Old Broome Precinct Structure Plan ('PSP') and proposed Local Planning Scheme No. 7 ('LPS7') Scheme Amendment No. 1 ('Proposed Amendment') which are currently being advertised for public comment. We have reviewed the draft PSP and Proposed Amendment and are instructed by our Clients to provide the following comments.</p> <p>Our Clients wish to confirm that they support the draft PSP and Proposed Amendment but request that the Shire consider a density increase from R30 to R50 in relation to the site and adjoining land to the immediate east. The basis for this request is explained below.</p> <p>The site is currently zoned 'Residential' under the provisions of LPS7 and is allocated a density coding of R10 on the Scheme Maps. If adopted as drafted, the Proposed Amendment would increase the</p>	<p>The Shire appreciates the support and intent provided in the submission, acknowledging the detailed justification provided.</p> <p>The Shire supports the intent of this submission and recognises the strategic merits of the proposal, including its alignment with the objectives outlined in the COBPSP. Specifically, the proposed R50 density coding:</p> <ul style="list-style-type: none"> Aligns with the surrounding built form and streetscape, creating a consistent urban interface at the eastern end of Louis Street. Capitalises on the site's corner location adjoining Residential R50 and Mixed-Use R50 zones. 	<p>That the submission be noted.</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p> <p>P1 - Figure 12: Old Broome Residential Sub-Precinct Requirements</p> <p>Figures modified to rezone Lot 203 (No. 6) Louis Street, Lot 2 (No. 44) and Lot 1 (No. 46) Robinson Street from 'Residential R30' to 'Residential R50'.</p>

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		<p>residential density coding on the site from R10 to R30. An R30 density coding will improve the site’s development potential allowing for the construction of up to eight (8) dwellings, subject to detailed design. An R50 density would further improve the site’s development potential allowing for the construction of up to 13 dwellings, subject to detailed design.</p> <p>An R50 density coding is preferred by our Clients as it will provide for the same development opportunities (and built form outcomes) as the land directly south and east of the site, and provide for a more consistent streetscape interface (that is, R50 opposite R50 as opposed to R30 opposite R50). This appears to be broadly consistent with the approach taken further south of the site, along Guy Street, which proposes an increased density of R50 on both sides of the road.</p> <p>The requested modification is illustrated in the figures below:</p>	<ul style="list-style-type: none"> • Supports the broader planning principles of providing increased housing supply and opportunities for future joint ventures or consolidation. <p>Given these considerations, the Shire proposes a modification to the COBPSP and Proposed Amendment No. 1 to rezone the site (Lot 203 (No. 6) Louis Street) and the adjoining properties at Lot 2 (No. 44) and Lot 1 (No. 46) Robinson Street from R30 to R50.</p>	

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		 <p>Proposed Residential Density Plan (PSP P1 - Figure 5)</p>  <p>Requested (Modified) Residential Density Plan</p>		

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		<p>The site, along with the adjoining lots to the east (being, Lot 310 (No. 44) and Lot 311 (No. 46) Robinson Street), contain existing dwellings with no Broome character either in terms of architectural style or design. An R50 density code encompassing all three (3) properties would provide a consistent streetscape at the eastern end of Louis Street and may also provide for a future joint venture opportunity. Our Clients have also indicated a willingness to acquire these properties should the owners be interested in selling. An R50 density coding at this location would also provide a consistent 'rounding off' of the density at the intersection of Louis and Robinson Street, the balance of which is designated an R50 density coding under the draft PSP and Proposed Amendment.</p> <p>The assignment of residential densities within the draft PSP appears to broadly follow the objectives set out in Part Two Section 4.5.5 'Residential Densities'. Here, R30 areas are described as "<i>areas [sic] to support increased housing supply while still feeling suburban. Primarily located around public facilities and mixed use areas</i>". R50 areas are described as "<i>high development potential areas adjoining mixed-use zones and/or lots with strategic significance such as potential consolidation on corner lots and sites with potential views to mangroves or beach</i>" (underline is our emphasis).</p> <p>Given the site's corner location adjoining Residential R50 and Mixed Use R50 areas, it would appear logical for an R50 designation to be considered for the site, particularly in conjunction with No. 44 and No. 46 Robinson Street to the east.</p> <p>Our Clients are keen to progress redevelopment of the site. They lodged a formal Scheme Amendment Request in 2008, shortly after</p>		

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		<p>purchasing the property, requesting an increase in density from R10 to R40. That Amendment Request was unsuccessful, with staff recommending that the Amendment not be initiated on the basis that the Shire was preparing to undertake a review of the Old Broome Development Strategy which would inform residential density allocations. That review was subsequently overtaken by the PSP process but in effect, has now taken some 16 years to complete. Our Clients have retained ownership of the property and currently lease the dwelling to a local nurse. They remain committed to redeveloping the site and would like to be able to maximise that development potential given the length of time that has passed since Council resolved to undertake a review of the Old Broome Development Strategy.</p> <p>Having regard to the above, we can confirm that our Clients support the draft PSP and Proposed Amendment. They will accept an R30 density allocation (if that is supported by Council) but believe that the site is locationally suited to an R50 density coding in addition to adjoining No. 44 and No. 46 Robinson Street to the east and should be allocated as such on the draft PSP and Proposed Amendment maps.</p> <p>Our Clients appreciate the work that has been undertaken by the Shire and its consultant team in preparing the draft PSP and thank the Shire for the opportunity to comment on the draft documents. We would be pleased to discuss this submission with your Office in further detail once you have had an opportunity to review and ask that you contact the undersigned.</p>		
13	James Carrigan	I own 29 Weld St (29A & 29B) It is proposed this property converts from mixed use to residential. In 24 Jan 04 the then owners were	The intent of the submission is acknowledged and understood. One of the primary drivers of rezoning	That the submission be noted.

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		<p>advised of a proposed change to mixed use. On 17 Feb 05 they requested no change (remain residential) which was rejected. It is now proposed to change back again. I am the only residential property in that area of Weld St surrounded by the Shire HQ complex, the Catholic Church complex and Broome Primary School. To my left at 31 and 33 Weld St a combined vacant site of 2500 sq mtrs both owned by BRAMS there is a concept proposal to build a large medical complex on that site for which they are currently seeking funding. I fail to understand why my property will be converted to residential only when all other properties (both existing and proposed) in my area of Weld St are otherwise. I would like my existing classification to remain.</p>	<p>the subject sites (and surrounding areas) from mixed use to residential was to consolidate mixed-use and commercial activity along Hamersley / Robinson Streets adjacent to Roebuck Bay and Town Beach. The Shire maintains its position that consolidating commercial / mixed use development on Hamersley Street is still the preferred outcome.</p> <p>However, the Shire supports the intent of your submission and recognises the unique circumstances of your property within the Weld Street locality. Considering its position surrounded by non-residential uses—including the Shire Administration, the Catholic Church complex, Broome Primary School, and the proposed BRAMS medical complex—the Shire agrees that retaining a non-residential classification is logical and consistent with the surrounding development framework.</p> <p>As such, the Shire will recommend that the zoning for Lot 1 (No. 29) Weld Street, Lot 12 (No .7) Haas Street, Lot 11 (No. 31) Weld Street, and Lot 10 (No 33) Weld Street should all retain their existing mixed-use classification. This will ensure a cohesive zoning strategy for this area that supports complementary uses and the broader strategic vision for this precinct.</p>	<p>P1 – Figure 2: COBPSP - Structure Plan Map and P1 - Figure 5: COBPSP - Residential Density Plan</p> <p>Figures modified to zone Lot 1 (No. 29) Weld Street, Lot 12 (No .7) Haas Street, Lot 11 (No. 31) Weld Street, and Lot 10 (No 33) Weld Street from 'Residential R50' to 'Mixed Use R50'.</p>
14.	Sean Salmon	As an owner and resident of 11 and 13 Robinson Street I object to these lots and those in the vicinity of Weld, Stewart, Robinson and	The Shire acknowledges the detailed submission provided. It is understood that the submission has	That the submission be noted.

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		<p>Barker Streets being rezoned from R10 to R30 as proposed in the Old Broome Precinct Structure Plan and associated Scheme Amendment to Local Planning Scheme 7.</p> <p>We have lived here for 25 years and were attracted to this area of Broome due to it's character and amenity and the belief, consistently reinforced by Shire policy in the intervening years, that this area would retain it's characteristic charm and uniqueness and R10 zoning.</p> <p>Previous Shire decisions, strategies and policies have recommended this area of Old Broome to be zoned R10 to <i>"Ensure the historical character and amenity is protected from redevelopment."</i> (LPS 1998).</p> <p>This rationale has been consistently reinforced through, amongst others, <i>The Broome Housing Strategy (1997)</i>, <i>TPS4 (2004)</i>, <i>Broome Planning Steering Committee (2005)</i> and the <i>Local Housing Strategy (2009)</i>.</p> <p>At the Council Meeting on November 20, 2013, the Council endorsed the Officers Comments and Recommendation that; <i>"Officers acknowledge that the Local Housing Strategy 2009 proposed that the area between Robinson and Herbert Streets remain R10 in recognition of it's historical character."</i></p> <p>This rationale was again reinforced in the latest planning documents the <i>Old Broome Development Strategy (2014)</i> and <i>LPS 6</i> which even further strengthened the protection of this historical area with the establishment of the Old Broome Special Character Area.</p>	<p>raised concerns about the impact of rezoning on the historic character and amenity of Old Broome, particularly in the Weld, Stewart, Robinson, and Barker Streets area. Responses to key issues raised are summarised below.</p>	<p>PART ONE Section 2.2.12 Heritage Management Expanded to provide specific guidance relating to the interface between new development and identified heritage sites.</p> <p>Section 4.1 Additional Information To be updated to set out the requirements for when a Heritage Impact Assessment will be required.</p> <p>P1-Figure 2 Structure Plan Map</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan</p> <p>Show Category 1-2 local heritage sites.</p> <p>Figures modified to rezone Lots 197 (No. 17), 198 (No. 13), and Lot 199 (No. 11) Anne Street, from</p>

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		<p>The rationale to protect the historical character and amenity of this area from unnecessary redevelopment is as relevant and pertinent today as ever. Broome has undergone many changes over the years, however the historical character of this area remains, it does not suddenly cease to exist, and if anything has become more important to the town’s identity and sense of place.</p> <p>a. Representation of heritage buildings</p> <p>After so many years of successive Shire officers and Councillors ensuring the protection of this unique area of Broome, and recognising that the best way to do this is ensuring the area remains R10, why does the draft OBPSP now defy this rationale?</p> <p>As established in previous Shire policy and recognised in the draft Old Broome Precinct Structure Plan at 1.3.7 the key characteristics of Old Broome are the wide reserves, large tree lined verges, large heavily vegetated lots and a distinctive scale and size of buildings. This is all represented in the Weld/Stewart/Robinson/Barker vicinity. The Barker/Robinson/Weld/Stewart area also contains two of Broome’s most celebrated historic buildings, St. John of God convent and McDaniels house. Both are listed on the State Register of Heritage Places and have a category ‘A’ listing in Broome Shire’s Municipal Heritage Inventory, meaning they are “<i>essential to the heritage of the locality.</i>” Both these buildings and adjacent areas are proposed for redevelopment to R30 in the draft OBPSP, however due to their significance and State heritage listing, the <i>Heritage of Western Australia Act 1990</i> provides that not only can’t they be redeveloped, but also that any future development affecting these sites, such as on adjacent properties, will need to demonstrate that the heritage significance of the places is retained.</p>	<p align="center">• Representation of heritage buildings</p> <p><u><i>Heritage Protection and Inadequate Safeguards</i></u> While the proposed COBPSP zoning approach does upcode certain heritage listed sites, as acknowledged in the submission, this does not mean that they will or are capable of being redeveloped. Heritage listed sites are protected by other legislation (e.g. Heritage Act and/or Local Planning Scheme) irrespective of their zoning. The submission does rightly point out, however, that there is limited commentary on how new development would interface with these heritage listed sites.</p> <p>The Shire recommends that:</p> <ul style="list-style-type: none"> • Section 2.2.12 Heritage Management be expanded to provide specific guidance relating to the interface between new development and identified heritage sites. • Section 4.1 be updated to set out the requirements for when a Heritage Impact Statements will be required. 	<p>‘Residential R30’ to ‘Residential R10’.</p> <p>PART TWO</p> <p>P2-Figure 8 To be updated to illustrate all heritage sites.</p> <p>Section 1.3.10 – Development Potential To be updated to better clarify the difference between development capacity and development potential. Further commentary regarding the impact of heritage listed properties to also be included, including illustrating them on P2 - Figure 22: Development Potential Assessment.</p> <p>Section 4.1 – Urban Ecology To be updated to include specific commentary regarding the Old Broome Special Character Area.</p>

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		<p>There is nothing in the draft OBPSP Old Broome Development Requirements (3.5.1) that ensures the conservation of the existing streetscape, or that built form will be compatible with the heritage buildings, and in an historical context, development to R30 will never fulfil these requirements.</p> <p>There should at the least be a requirement for a Heritage Impact Statement and a requirement that developments adjacent to buildings on the Shire’s heritage list conserve the existing streetscape and are compatible in built form, including height, with the adjacent heritage building/s.</p> <p>The draft OBPSP 1.2.5 Culture values and Identity states; <i>“There are several places listed on the Shire’s Municipal Heritage Inventory in the COBP, with 17 of these places also registered on the State Register of Heritage Places. A listing on the State Register of Heritage Places affords a place the highest level of protection under the Heritage of Western Australia Act 1990. P2 - Figure 8 depicts all existing heritage places and areas on the Shire’s Municipal Heritage Inventory, State Register, and Aboriginal Heritage Sites Register.</i></p> <p>This statement and the accompanying map are false and misleading, underplaying the true level of heritage buildings within the area. Far from depicting all the existing heritage places, P2 – Figure 8 does not depict any of the places on the Shires Municipal Heritage Inventory, that are not state listed. For the statement and P2 – figure 8 to be accurate it also needs to include; 19 Barker Street 34 Weld Street 38 Weld Street</p>	<p>These additions put controls in place so that new development thoughtfully considers its interface with adjoining heritage properties.</p> <p><u><i>Identification of Heritage Places in COBPSP</i></u> It is acknowledged that P2-Figure 8 Culture Values and Identity is not currently displaying any sites on the Local Heritage List, despite ‘local heritage’ being identified in the legend.</p> <p>This is a map drafting error. The Shire agrees that this figure requires an update to show all heritage listed sites (state and local) for accuracy.</p> <p>It is also recommended that heritage Category 1 and Category 2 sites be identified for protection should be illustrated on the Structure Plan Map as these are the site listed in the Heritage List under LPS7.</p> <p>Note, the following properties are shown on the figure:</p> <ul style="list-style-type: none"> • 28 Weld Street • 22 Weld Street • 11 Anne Street • 9 Barker Street • 8 Hamersley Street • 47 Walcott Street 	

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		<p>24 Robinson Street 78 Herbert Street 55 Herbert Street 24 Stewart Street 29 Stewart Street 63 Walcott Street 22 Weld Street 38 Hammersley Street 11 Anne Street 13 Anne Street 9 Barker Street 8 Hammersley Street 40 Robinson Street 41 Walcott Street 38 Walcott Street 47 Walcott Street are also State Heritage listed and correctly illustrated.</p> <p>Nearly all of these heritage buildings fall within the Old Broome Special Character Area but have been left out of the maps and statements in the draft OBPSP which supposedly depicts the heritage of the area. The OBPSP should not continue with a higher density rezoning in this area, as the draft that has been out for public comment is clearly misleading when it comes to the heritage of Old Broome.</p>	<p>The following sites while on the Shire’s Municipal Inventory, are listed as Category C places and therefore are not on the Heritage List and do not have any planning implications. Therefore these sites will not be shown:</p> <ul style="list-style-type: none"> • 19 Barker Street • 34 Weld Street • 24 Robinson Street • 55 Herbert Street • 24 Stewart Street • 29 Stewart Street • 38 Hamersley Street • 13 Anne Street <p>The following properties will need to be updated on the figure:</p> <ul style="list-style-type: none"> • 63 Walcott Street • 19 Anne Street • 40 Robinson Street • 13 Anne Street • 40 Robinson Street • 41 Walcott Street • 38 Walcott Street • 78 Herbert Street – note this falls outside the precinct but should be shown for context. 	

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		<p>b. Old Broome Special Character Area</p> <p>How is the public expected to make an informed opinion and submissions when the basic information provided is missing, and the statement in the text misleading?</p> <p>The Council meeting of 26 May 2022 endorsed the 9.2.1 Final adoption of Local Planning Strategy and states that, <i>“It is noted that there is a portion of area within the Old Broome Development Strategy that is recognised as having special character, being the Old Broome Special Character Area. It is recommended that Figure 6 of the draft Strategy be updated to reference this special character area, which would be reviewed, and appropriate design controls put in place through the Precinct Structure Plan preparation process.”</i></p> <p>This recommendation from Council has not been included in the draft OBPSP. There is no map of the Old Broome Special Character Area within the OBPSP, and no reference to the Old Broome Special Character Area other than to twice state that a review should be undertaken, (Site and Context analysis LU-2 and Design Elements LU-2).</p> <p>Where is the review?</p> <p>Where is the map of the Old Broome Special Character Area as recommended by Council?</p> <p>Were landowners or the public informed a review of the Old Broome Special Character was being undertaken?</p> <p>The only other reference to the Old Broome Special Character Area is within 4.5.5 Residential Densities where it is referred to as the area <i>“formally referred to as The Old Broome Special Character Area”</i>.</p> <p>How can the draft OBPSP call for a review of the Old Broome Special Character Area, not include a map of the special character</p>	<p>b. Old Broome Special Character Area</p> <p>It is acknowledged that Part Two of the COBPSP does not provide specific commentary regarding the Old Broome Special Character Area, and that this has led to concerns about the transparency of the planning process and the ability for the community to make informed submissions.</p> <p>At the time of preparing the COBPSP, a thorough review of the existing planning framework, including the Old Broome Development Strategy and Local Planning Policy 5.16 Old Broome Development Strategy, was undertaken. However, neither documents clearly defines the specific built-form elements or heritage aspects of Old Broome that are to be retained through the designation of the Old Broome Special Character Area.</p> <p>The most explicit guidance is found in Clause 2.4 of Local Planning Policy 5.16, which states that:</p> <p><i>“Development within the Old Broome Special Character Area is to preserve the existing open character of the area.”</i></p> <p>While this area contains numerous heritage-listed and character properties, the defining elements of its character—such as wide streets, generous verges, and mature vegetation—are largely spatial</p>	

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		<p>area, not include most of the heritage places within the Special Character Area, have no other reference to the Special Character Area, and then refer to it as the area “formerly referred to as the Old Broome Special Character Area” at 4.5.5 Residential densities? If the OBPSP is reviewing the Old Broome Special Character Area, how can the same document consider the Old Broome Special Character Area as “formerly referred to” when it has had no other considerations throughout the document? The OBPSP rightfully acknowledges that “Old Broome is rich in cultural heritage, relating to both pre and post-colonial settlement. Its heritage (cultural, built and natural) helps define what is unique about Old Broome and its place in Broome’s history” (1.3.1 Location.) However, far from seeking to preserve the built heritage of Old Broome the OBPSP focuses solely on what and where we can dispense with the heritage. A proper review of the Old Broome Special Character Area would be seeking how to better understand, interpret and preserve this area. A proper review may have identified more built-form that requires a level of protection, preservation or recording, and equally may identify some areas where redevelopment could occur without a negative impact on the heritage values of the area. Unfortunately, the draft OBPSP does neither adequately.</p>	<p>and landscape-driven rather than strictly built-form related. Importantly, the PSP includes controls to ensure that these key features are maintained, even with the proposed zoning changes.</p> <p>The Shire and its consultants considered the importance of the role and significance of the Old Broome Special Character. This was tested during the design engagement process, where it was determined that retention of the Old Broome Special Character areas was desired. While it is not formally shown on the mapping, this is evidenced in the proposed zoning changes, whereby substantial areas of the existing R10 have been retained (see response to point d for further details). There are two primary areas where rezoning is proposed, justification is as follows:</p> <ul style="list-style-type: none"> • The four urban blocks generally bounded by Walcott, Stewart, and Weld Streets and Broome Hospital. This area contains a large number of large vacant, historic spot rezonings which have already altered the character on some lots, and has good proximity to major non-residential uses and attractors (e.g. Broome Hospital and Primary School). • The two urban blocks generally bounded by Anne, Walcott, Guy, and Robinson Streets. This area contains a prevalence of large 	

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			<p>sites predominantly cleared of vegetation, is situated near Roebuck Bay and the Robinson Street Mixed Use Precinct and located on the Guy Street east-west corridor. Some landowners have signalled an intent to support rezonings. The Shire has however, identified that three properties on Anne Street (No 11-17) should be rezoned back to R10 due to the heritage qualities of these sites.</p> <p>The Shire maintains its position that the proposed outcome achieves a good balance of character preservation, while supporting opportunities for infill in the right locations. To address the concerns raised, the Shire proposes the following changes:</p> <ul style="list-style-type: none"> • Illustrating the Old Broome Special Character Area in Part Two. • Outlining the specific heritage sites that warrant preservation on relevant graphics. • Changing the zoning of existing State Heritage Properties on Anne Street back to Residential R10. <p>These additions will add greater visual clarity to how these elements have been considered.</p> <p>Furthermore, it is noted that the proposed amendment referenced in a. above, which would see the need for a Heritage Impact Statements to</p>	

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		<p>c. Flawed Development Potential Assessment</p> <p>1.3.10 Development Potential of the OBPSP states that the analysis identified</p> <p><i>Large portions of Old Broome are identified as having medium potential (some isolated areas have high potential) for redevelopment, primarily in areas where there are concentrations of low density R10."</i></p> <p>The assessment methodology was influenced by tenure, lot size, existing use and age/condition.</p> <p>Old Broome, from Herbert Street east to the bay, is the oldest residential area in Broome, with some buildings over 110 years old. This methodology is completely flawed for such an area. It does not consider</p> <ul style="list-style-type: none"> Houses/buildings that have been restored. Houses/buildings that have been renovated. Houses buildings with heritage. Houses buildings with heritage listings, either State Heritage listed or the Broome Municipal Heritage Inventory. <p>For example, McDaniels House, on the corner of Barker and Weld Street, is a State Heritage listed building that has been restored at great expense to the highest level, yet due to the flawed methodology of the assessment is identified (P2 – Figure 22) as</p>	<p>be supplied if development adjoins a heritage listed site, would assist to preserve buildings with distinct character that should be maintained.</p> <p align="center">c. Flawed Development Potential Assessment</p> <p>It is recommended that the Part Two is modified to better clarify the intent and purpose of the Development Potential Assessment. The intent of the Development Potential Assessment is primarily a spatial exercise which identifies areas which have the spatial capacity to support future development. It is recommended that Part Two be modified to provide a clearer distinction that the study's purpose was to understand capacity, and is not intended to pre-empt which sites will and will not be developed. One of the key statements relevant to Old Broome (Page 67) includes the following:</p> <p><i>Large portions of Old Broome are identified as having medium potential (some isolated areas have high potential for redevelopment, primarily in areas where there are concentrations of low density R10. Lot sizes throughout this part of the precinct are large enough to support sensitive redevelopment that does not detract away from the character of Old Broome (this will need to be tested through stakeholder engagement).</i></p>	

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		<p>having a 'high potential' for development. <i>High potential – being land that is highly likely to be developed in the next 10 years.</i></p> <p>How can a State Heritage listed building be considered 'high potential for development'? How can State heritage and Broome Municipal Heritage Inventory listed buildings be identified as having 'high' and 'medium' potential for development?</p> <p>Both the lots I own, at 11 and 13 Robinson Streets, have also both been identified as 'high potential' for development. Both have been lovingly restored and renovated at considerable expense. As has the house next door on Barker Street, a 100-year-old building, that is also assessed as 'high potential' for development.</p> <p>'Arthur Flats' on the corner of Barker and Robinson Street is a 'master pearler' dating back to 1910, is listed in the Broome Municipal Inventory of Heritage Places, and has been renovated and restored, yet is identified as 'medium potential' for development.</p> <p>St. John of God Convent on Barker Street is a State Heritage listed building yet is identified as 'medium potential' for development.</p> <p>There are also other properties within the Old Broome Special Character Area, in Walcott St., Mary St., and Herbert St., that I am aware of that have been restored and renovated yet are considered 'high' or 'medium' potential for redevelopment. Rather than being considered highly likely to be developed, the opposite is true. It is highly doubtful that any of these lots mentioned, and many others, will be redeveloped in the next 10 to 20 years, yet this is not reflected at all in the Development Potential Assessment.</p>	<p>For example, despite the Development Potential Assessment (P2-Figure 22) identifying the majority of lots on the western side of Walcott Street as having 'medium' or 'high' potential they have not been proposed for rezoning. The majority of these sites have retained their Residential R10 designation consistent with previous planning exercises.</p> <p>However, the Shire does agree, that P2-Figure 22 should be updated to illustrate heritage properties which will help clarify that even though these sites may have the 'capacity' to develop, there are other limiting factors which will determine whether they are actually developed. While this change will not alter the outcomes of the assessment i.e. the proposed zoning approach, it will clarify the nuances of the study.</p>	

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		<p>As outlined the Development Potential Assessment and associated maps are so deeply flawed that that they should not be relied upon to influence any further part of the OBPSP, such as at 1.4 Response to Context US-2 of the OBPSP <i>As captured in the development potential assessment there are a number of large undeveloped lots in the COBP or lots with low intensity and/or aging buildings. These areas that provide high potential for redevelopment should be prioritised...</i></p> <p>How can the Development Potential Assessment be relied upon to support rezoning when it gets it so wrong?</p> <p>How is the public expected to make an informed opinion and submissions when the information provided is so flawed?</p> <p>d. Sensitive infill development</p> <p>3.5 P5 - OLD BROOME RESIDENTIAL 3.5.1. DEVELOPMENT REQUIREMENTS OLD BROOME RESIDENTIAL SUB-PRECINCT INTENT SUB-PRECINCT OBJECTIVES <i>New housing is developed across a range of residential densities to provide housing choice which meets the diverse needs of the local community.</i></p> <p>Broome does not finish at Herbert Street. There are no other precincts in Broome with R10 lots. Rezoning so many lots within Old Broome from R10 to R30 is decreasing the range of residential densities and housing choices, not increasing it.</p>	<p>d. Sensitive Infill Development <u>Objection to Rezoning from R10 to R30</u> Regarding the extent of R10 rezoning proposed as part of the COBPSP, of the 146 properties identified as being R10 (currently):</p> <ul style="list-style-type: none"> • 69 Properties are retained as R10 (47%) • 51 Properties are rezoned from R10 to R30 (35%) • 26 Properties are rezoned from R10 to R50 (18%) <p>The Shire has adopted a balanced approach, with the areas being upcoded proposed primarily east of Walcott Street.</p> <ul style="list-style-type: none"> • Ultimately, the upcoding cannot force private landowners to redevelop and it 	

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		<p>The Barker/Robinson/Weld/Stewart St block already has an existing housing diversity with a 2-story block of units on the Barker/Weld St corner and another on the Barker/Robinson Street corner. Both these buildings were established before Broome had any planning controls and were later given spot rezoning.</p> <p><i>Sensitive infill development is implemented to ensure the existing landscape character of Old Broome is protected.</i></p> <p>This statement makes no sense. Without higher density infill development, there is little requirement for the protection of the existing landscape character of Old Broome, whether the development is 'sensitive' or not. Furthermore, 'sensitive infill development' to a higher density is impossible to implement. The requirements of subdivision from R10 to R30 will require extensive earthworks and clearing of vegetation; for the implementation of retaining walls for drainage, establishing new boundaries for fences, connections to sewerage and power, and then the new buildings. The corner of Barker and Robinson Streets was recently subdivided, and the requirements of the subdivision left no trees or any vegetation on the lot, and all the verge was cleared except for a few trees.</p> <p><i>New development ensures that Old Broome's tree canopy is enhanced through a combination of tree retention and new planting.</i></p> <p>See above. All vegetation was cleared in order to adequately fulfil the requirements of the subdivision including trees that were 60+ years old. It is not replaceable.</p>	<p>does not supersede other relevant legislation regarding heritage protection.</p> <ul style="list-style-type: none"> • The COBPSP acknowledges the importance of the built / landscape character in Old Broome and does include measures which enable both protection of built heritage and preservation / enhancement of landscape character. This includes specific requirements which limit site cover (percentage of a site which can be occupied by buildings) and promote larger spaces for landscaping. • While the dwelling capacity may appear to be modest, the precinct could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares precinct. The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire's Local Planning Strategy. The benefit of the COBPSP is that it provides short-medium term opportunities for housing growth, in areas which can make better use of existing infrastructure. 	

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		<p>Also, no design guidelines or development requirements implemented by the Shire can prevent an owner of a lot clearing any trees or landscape they desire on their lot, or ensure they plant new trees.</p> <p>Rezoning areas of Old Broome that retain the historic character and heritage from R10 to R30 will, without doubt, ensure the existing landscape of Old Broome is considerably diminished, not protected.</p> <p>The areas the draft OBPSP identifies in the Old Broome Special Character Area for rezoning from R10 to R30 will only provide a very minimal amount, if any, of extra housing for Broome.</p> <p>An R10 lot with a grouped dwelling and an auxiliary building can potentially house just as many people as the 3 x R30 lots that will replace it. R30 lots allow for a single dwelling, not a grouped dwelling, nor do they allow for an auxiliary building. Broome already has an abundance of R30 lots outside of the Old Broome precinct for such development. The loss of historic character to the oldest residential area of Broome that will accompany the rezoning is unacceptable when the supposed gain in actual housing is negligible or at the least, minimal.</p>	<p><u>Contemporary Planning Framework</u></p> <p>The concerns around how future development will impact on landscape character are understood. The following points are provided:</p> <ul style="list-style-type: none"> • The Structure Plan once approved will be a Western Australian Planning Commission endorsed document. The document will therefore provide stronger guidance than the existing framework. The COBSPS also includes modifications to the R-Codes, whereby planning controls relating to site cover and landscaping have been modified to strengthen these aspects. This was proposed to ensure development outcomes which had better consideration for the landscape character elements of the Old Broome area. • A key principle of the COPSP is to promote that a prominent tree canopy can be maintained. It is acknowledged that with redevelopment some trees may be lost in the short-term, however, the planning framework includes landscape and open space controls which will ensure that new development is supported by planting of trees. • Some lots in the Old Broome Special Character Areas are large enough that they could be subdivided, even at an R10 	

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			<p>coding. As above, the additional built form and landscape guidance contained in the COBPSP can be a positive for the area.</p> <ul style="list-style-type: none"> Contemporary planning systems are supported by design review and other mechanisms to ensure design quality is at the forefront of good planning decisions. The Shire has a Design Review Policy in place and relevant proposals will be referred to the Design Review Panel to ensure the integrity of the COBPSP planning controls are maintained. Finally, the R-Codes Volume 1 (which will apply throughout the COBPSP) were recently updated in 2024. The base standard of medium density development is expected to improve as a result, with substantially greater emphasis now placed on sensitive infill development which is conscious of its individual site and surrounding context. 	
15	Diana Oliver 2/18 Barker Street	In the last few months I have watched the demolition of several old houses on two large blocks on Robinson & Walcott street. Nearly all the trees were removed and the blocks cleared and re-levelled to alter the natural drainage.	<p>The concerns regarding potential impacts of infill development as a result of the COBPSP zoning changes are noted.</p> <p>The background reporting has demonstrated that with the proposed zoning changes, the precinct</p>	<p>That the submission be noted.</p> <p>No change recommended.</p>

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		<p>The attractive features of this area are the big blocks, shady trees, established gardens and the many historic buildings of Heritage values and status. This was deemed the Old Broome special character area with R10 Zoning for a reason!</p> <p>Please do not further the removal of trees and clearing of blocks by increasing the zoning to R30, 40 or 50.</p> <p>I have lived in several blocks of units, my current unit is a private rental. Neighbour noise, traffic, the lack of gardens and big trees, frequent break-ins, violence and anti-social behaviour seem to be a symptom of high density housing.</p> <p>Please keep this scenario out of Old Broome. New land release areas are better equipped for innovative design and clever planning for high density living.</p>	<p>could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares precinct. The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire's Local Planning Strategy. Through its draft Local Planning Strategy, the Shire has carefully considered all alternative locations for future urban growth with multiple opportunities identified. The benefit of the COBPSP is that it provides a short-medium term opportunities for housing growth, in areas which can make better use of existing infrastructure.</p> <p>Extent of Zoning Changes Regarding the extent of the rezoning, of the 146 properties identified as being R10 (currently):</p> <ul style="list-style-type: none"> • 69 Properties are retained as R10 (47%) • 51 Properties are zoned from R10 to R30 (35%) • 26 Properties are zoned from R10 to R50 (18%) <p>The Shire has adopted a balanced approach, with the areas being upcoded proposed primarily east of Walcott Street.</p> <p>Character Protection The COBPSP acknowledges the importance of the built / landscape character in Old Broome and does include measures which enable both protection of</p>	

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			<p>built heritage and preservation / enhancement of landscape character. This includes specific requirements which limit site cover (percentage of a site which can be occupied by buildings) and promote larger spaces for landscaping.</p>	
16	<p>Element Advisory on behalf of Paspaley Properties Pty Ltd and Pearls Pty Ltd (Paspaley)</p>	<p>Introduction/context</p> <p>Element Advisory has prepared this submission on behalf of Paspaley Pearls Properties Pty Ltd and Pearls Pty Ltd (Paspaley) on the Cable Beach Precinct Structure Plan (CBPSP), Chinatown-Old Broome Precinct Structure Plan (COBPSP) and the Shire Of Broome Local Planning Scheme No. 7 - Scheme Amendment No. 1, all of which are currently being advertised by the Shire of Broome (the Shire).</p> <p>Paspaley is a significant local landowner with longstanding interests in the Broome townsite with numerous properties within Chinatown, Old Broome and Cable Beach and therefore, the advertised planning documents are of significant interest to Paspaley. The particulars of the Paspaley owned in the precinct are:</p> <ul style="list-style-type: none"> • 6 and 8 Short Street • 1, 3, 5, 7 and 9 Carnarvon Street • 1, 2, 4, 6, and 8 Dampier Terrace • Lot 435 Chapple Street • 30, 32, 34 and 38 Hamersley Street • 47 Robinson Street. 	<p>The Shire acknowledges the submission provided by Paspaley Pearls Properties Pty Ltd and Pearls Pty Ltd (Paspaley) and welcomes investment in and commitment to the Broome region. Their role as a significant local landowner with assets across the Chinatown-Old Broome Precinct is noted.</p> <p>Responses to the various issues raised in the submission are provided as follows.</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1-Figure 6: Chinatown Sub-Precinct Requirements</p> <p>Figures modified to rezone Lot 435 Chapple Street from 'Residential R10' / 'Foreshore Reserve' to 'Regional Centre'.</p> <p>Section 1.2.2. Interpretations New definition for consolidated site to be included.</p> <p>P1 - Table 7: COBPSP Streetscape Requirements</p>

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		<p>Paspaley has a number of proposed plans for its various landholdings within the areas affected by the proposed CBPSP, COBPSP and Scheme Amendment No. 1 and has therefore reviewed these documents to ascertain how these will impact both on Paspaley's current property interests as well as their future plans. Paspaley has a common interest with the Shire in ensuring Broome continues to grow as a thriving Regional City. We respectfully request that consideration be given to the comments and proposed changes outlined below.</p> <p>Chinatown-Old Broome Precinct Structure Plan Paspaley supports the objectives of the COBPSP and, in particular, those in relation to the need to encourage increased development intensity through mixed use development in key precincts and, to ensure that Chinatown remains the Central Business District of Broome. Paspaley's comments on the specific parts of the COBPSP follows.</p> <p>a. Rezoning objections <u>Lot 435 Chapple Street</u> Lot 435 Chapple Street, Broome, is proposed to be rezoned in the Structure Plan Map to Foreshore Reserve. This will remove the landowners' development rights, negatively affecting the land and will entitle Paspaley to make a claim to the Shire for injurious affection. Paspaley strongly objects to this change as the land is developable in accordance with the CHRMAP.</p> <p><u>Lot 3067 Dampier Terrace</u> Lot 3067 Dampier Terrace is shown in the COBPSP Structure Plan Map as being part rezoned to Public Open Space. This land is currently located wholly within the Regional Centre (R50) zone.</p>	<p>a. Rezoning Objections <u>Lot 435 Chapple Street</u> The Shire acknowledges the concerns raised regarding the proposed rezoning of this property from Regional Centre (R50) to Foreshore Reserve. The reasoning behind this rezoning was guided by the findings of the Shire's 2017 Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) and the associated risks posed by coastal erosion north of Gray Street, including the area encompassing this property.</p>	<p>Modify maximum fence height to align with R-Codes. Retain permeability requirements.</p> <p>Modify laneway requirements to provide greater clarity on access and tenure arrangements.</p> <p>Part One – Section 2.2.9 Introduce new Clause 3 (c)</p> <p>Any parking bays which are required as a condition of development approval that cannot be provided on-site, the decision maker at its discretion, may allow these to be developed in a portion of the abutting road verge. If approved, it is the applicant's responsibility to design and construct the parking bays in accordance with the Shire's 'Guidelines for Construction or Reinstatement'.</p> <p>P1 - Figure 6: COBPSP Chinatown Sub-Precinct Requirements</p>

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		<p>Despite being shown on the COBPSPS Structure Plan Map as being rezoned it is not included in the list of properties being rezoned in Scheme Amendment No. 1. Therefore, the proposal for this land is uncertain. Nonetheless, any identification of the land as Public Open Space will remove and/or limit the landowners' development rights, and Paspaley strongly objects to this proposed change to Lot 3067 Dampier Terrace. There is no planning requirement for public open space on this lot. As noted above, the identified land for POS is the subject of a licence agreement between Paspaley and the Shire (for a \$1 annual fee) which provides for public (visitor and tourist) and maintenance access to Streeter's Jetty and to preserve the amenity and safety of the Streeter's Jetty – these objectives can continue to be provided for with the redevelopment of this lot if these provisions regarding access and views are provided for in the COBPSP. It is not necessary to provide that this privately owned land be rezoned as POS to facilitate ongoing access to Streeter's Jetty. It is noted that the Shire is aware that Paspaley has development aspirations for this land.</p>	<p>The CHRMAP identifies areas at risk of coastal processes (erosion and inundation) and provides guidance on land use planning to minimise potential future impacts on property, infrastructure, and public safety.</p> <p>The area north of Gray Street, where this property is located, has been assessed as being at heightened risk of coastal processes over the medium to long term. This area has not been earmarked for coastal protection measures in the CHRMAP. Consequently, the Amendment proposed an approach to limit intensification of land uses, including higher-density residential and commercial activities, which would exacerbate the risks to both private properties and public infrastructure in the future.</p> <p>Notwithstanding the above, the Shire understands the issues raised and proposes to change the zoning of this site back to Regional Centre noting that future development will still be required to be delivered in accordance with the COBPSP and the Broome Townsite CHRMAP.</p> <p>The primary reason why this change in zoning is supported, is changing it to a 'Foreshore Reserve' could trigger injurious affection which is an unintended consequence.</p> <p><u>Lot 3067 Dampier Terrace</u></p>	<p>Modify figure to include one primary east-west laneway with a notation explaining its exact location can be flexible.</p>

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		<p>b. Building Heights bonus criteria <i>Section 2.2.2 Building Heights – Bonus Height Criteria</i> The words “single consolidated site” in sub clause (a) of this provision may be construed to mean a single lot. It is suggested that this sub clause include an additional provision to reflect the ability to consolidate lots as a condition of development approval. It is suggested the statement “(or have the ability to be consolidated)” could be inserted after the words “single consolidated site”. This would clarify the intent of this clause.</p> <p>c. Fencing controls <i>P1 – Table 7: COBPPSP Streetscape Requirements</i> It is noted that the residential fencing provisions state that all fences within the primary street setback areas shall be no higher than 1.2m. Provided that the 80% minimum permeability provision</p>	<p>While the Shire acknowledges that rezoning this land to Public Open Space may limit its development potential, the land is incorporated in the State Heritage Register as it provides visual and public access to streeters jetty and should be maintained for public access. This approach is consistent with the adopted Chinatown Masterplan.</p> <p>The Shire’s intention is to retain the site’s ‘Regional Centre’ zone in LPS7 and maintain designation of this land as open space in the Precinct Structure Plan. No change is therefore recommended in this regard.</p> <p>b. Building Heights – Bonus Criteria The intent of this matter is understood and supported. It is proposed that a definition for ‘consolidated site’ be included in Section 1.2.2 Interpretations as follows:</p> <p><i>“Consolidated Site” refers to any property or properties that form part of a single development application. This can include more than one site where it can be demonstrated that the properties are in sole ownership and/or that an agreement has been reached between all individual landowners who form part of the development application.</i></p> <p>c. Streetscape and Residential Fencing Requirements</p>	

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		<p>is achieved it is considered strongly desirable, noting the need for security and privacy, that higher fencing be permitted. The R Codes Volume 1 provisions are preferable in this respect, noting the R Codes Volume 1 provides that front fences within the primary street setback area are visually permeable above 1.2m of natural ground level. Not that the overall fence height is limited to 1.2 metres. Safety and security are highly valued in Broome and therefore taller front fences should reasonably be permitted.</p> <p>d. landscaping <i>Section 2.2.7 Landscape and Deep Soil</i> The soft landscaping percentages for all land uses are noted as being notably higher than the equivalent R Code Volume 1 requirements. In particular the 30% soft landscape requirement for single houses, grouped dwellings and multiple dwellings is likely to affect the development feasibility of these land uses and should be carefully reviewed.</p> <p>The Tourism, Regional Centre (Commercial Sub Precinct) and All Other Zones provisions of 20-25% soft landscaping is also high and may impact on the feasibility of these types of development. Have these requirements been sufficiently tested with contemporary development outcomes to give the Shire certainty that they can be practically achieved? It is respectfully requested that the minimum soft landscaping requirements be reduced or refined to relate to percentages within particular setback areas (i.e. the front setback) or to more narrowly defined parts of the site rather than as blanket percentages which apply to the total site area.</p>	<p>The intent of this matter is understood and supported. The 80% permeability requirement will be required to be retained from a climatic design perspective. However, increasing the maximum fence height to 1.8m to align with the now gazetted R-Codes Volume 1 is supported.</p> <p>A modification to P1 - Table 7: COBPSP Streetscape Requirements to reflect this change is therefore proposed.</p> <p>d. Landscaping Requirements The concerns raised regarding the feasibility of the proposed 30% landscaping requirement for residential uses and 20-25% for other zones is understood.</p> <p>However, modifications to the COBPSP's proposed standards are not supported. The green landscape character of the COBP was identified as one of the most important design elements during Community and stakeholder engagement. In response, site cover and soft landscaping were a primary focus of the built form strategy for the COBPSP. Minimising site cover and maximising soft landscaping is essential in maintaining high quality tree canopy in the private realm, assisting with water management, and contributing to local character.</p>	

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		<p>e. parking <u>Section 2.2.9 Car Parking and Vehicle Access</u> Clause 3(b) states that visitor parking must be accommodated on site. It is respectfully requested that the Shire re-visits this provision to acknowledge that there may be suitable locations where visitor parking could be provided within adjacent road reserves / verges where it is convenient and accessible. This is considered to be appropriate within Old Broome where many of the road reserves are very generous and wide (circa 40m) and could readily facilitate streetscape upgrades as part of development incorporating landscaping and visitor parking. It is noted that there is a provision in the CBPSP that allows for the use of the road reserve for car parking at the Shire's discretion and in many locations around town this has been taken up. A similar provision should be provided for in the Old Broome area.</p> <p>f. transformative development opportunities <u>Section 3.1 P1 – Chinatown Core</u> As the Shire is aware, Chinatown is constrained by virtue of the reserved land to the west; coastal hazard affected land to the north and east; and height restrictions associated with the flight paths and airport location. As a key landowner within Chinatown, Paspaley is actively exploring opportunities to attract new tenants to Chinatown as a catalyst for new development and growth to support Chinatown's role as the Central Business District of Broome. Given the fragmentation of landholdings in Chinatown Paspaley</p>	<p>Part Two demonstrates that design testing was undertaken for a range of lot types to ensure that these outcomes can be achieved.</p> <p>If individual landowners wish to vary these requirements, then this is to be managed and justified through the development application process.</p> <p>e. Car Parking and Vehicle Access It is still the Shire's preference that vehicle parking be accommodated on-site wherever possible, so as to ensure that parking in verge areas does not dominate streetscapes.</p> <p>The Shire has identified that Clause 2.2.9 3 (b) does conflict with Council's position on verge parking as set out in Local Planning Policy 5.6. The Shire supports the intent of this part of the submission and will introduce a new clause to allow greater flexibility.</p> <p>f. Chinatown Core – Development Standards <u>Local Development Plans/Masterplans:</u> Paspaley's request to incorporate a provision allowing for transformative development opportunities in Chinatown through preparation of a Local Development Plans of Master Plan is noted. It should be noted that per Section 4.7.2 of the WA Planning Manual Guidance for Structure Plans Precinct Structure Plans should not defer built form requirements to a local development plan.</p>	

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		<p>respectfully requests that inclusion of a specific provision under Section 3.1 P1 – Chinatown Core, that identifies the potential for a transformative development opportunity in both the Sub-Precinct Objectives and Development Requirements. Suggested wording could include:</p> <p><i>A Local Development Plan or masterplan may be prepared to vary the development outcomes in the Precinct Structure Plan (PSP) for land in Chinatown recognising that if additional land (including existing road reserves) can be unlocked to facilitate new transformative opportunities these should not be constrained by the development outcomes in the PSP. Any Local Development Plan or masterplan will be assessed against the design principles of State Planning Policy 7.0 and the objectives set out in the PSP.</i></p> <p>g. East-west laneways, development requirements considered excessive.</p> <p>P1 – Figure 6 denotes two east-west laneways and one north-south laneway as being required within the block between Carnarvon Street and Dampier Terrace in Chinatown. These are identified as each requiring a minimum dimension of 3 metres and vertical clearance of 2.8 metres. The extent of laneways required within this block, which is majority owned by Paspaley, is considered to be excessive. One high quality east-west connection in a flexible location to suit the proposed future development is considered to be more appropriate, as a single laneway will avoid a dilution of the activation (and passive surveillance) needed to front such a significant extent of laneway edges as shown in the COBPSP. The proposed arrangement of these three laneways also segments the development opportunities in this block for any land uses/tenants</p>	<p>If the Local Development Plan / Master Plan is simply being used to vary the development standards. Then this should be managed via a traditional development application process.</p> <p>The Shire acknowledges, supporting transformative solutions should be considered. The best mechanism for this, is to enable any future changes to occur as a Structure Plan Amendment, allowing the community to be consulted and the WAPC to have oversight of any changes as the PSP would ultimately become a WAPC endorsed document.</p> <p>g. East-west laneways, development requirements considered excessive.</p> <p>Paspaley's concerns around the extent of laneways is understood. However, it must be acknowledged that a defining feature of Chinatown is its prevalence of varied midblock connections which include a combination of open air and covered pedestrian only lanes.</p> <p>The laneways shown on P1 - Figure 6: Chinatown Sub-Precinct Requirements are intended to be indicative supported by the standards set out in P1 - Table 7: COBPSP Streetscape Requirements. As a due regard document, the onus is on landowners to</p>	

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		<p>that may desire a larger floorplate and as such, the proposed laneways cut across potential opportunities.</p> <p>The COBPSP is also silent on what tenure or access arrangements are anticipated for these laneways. It is submitted that any through block links should reasonably be provided as privately owned links that are publicly accessible only during opening hours agreed hours and that outside of these hours the links can be secured.</p> <p>Further, there is no recognition that the provision of these laneways represents a significant community benefit, which ordinarily should be recognised as permitting an increased scale of permissible development or alternatively, flexibility in accommodating site specific variations to development controls where such community benefits are provided. Paspaley requests that the community benefit being delivered by a through block laneway be recognised in the COBPSP with associated flexibility to consider site specific variations to development controls.</p> <p>Conclusion We trust the comments provided will assist the Shire in reviewing the advertised documents. We urge the Shire to make amendments, as requested, to ensure that Paspaley does not lose development rights on Lot 435 Chapple Street or Lot 3067 Dampier Terrace and that LPS 7 and the PSPs provide for an appropriately flexible and robust planning framework that provides the necessary impetus to guide much needed growth within Chinatown, Old Broome and Cable Beach.</p> <p>We welcome any feedback on this submission and would be happy to arrange a meeting to discuss in greater detail. Should you have</p>	<p>demonstrate alternate arrangements that can still satisfy the COBPSP's objectives. A modification to P1-Figure 6 is supported, to not adversely impact development potential.</p> <p>It is acknowledged that the standards in <i>P1 - Table 7: COBPSP Streetscape Requirements</i> should allow greater design flexibility and provide further guidance on access and tenure arrangements.</p> <p>The potential to link provision of midblock connections to greater flexibility on development standards is acknowledged. However, with building heights and plot ratio limited by other factors the ability for any specific site concessions is limited.</p>	

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		any queries or require clarification on the above matter, please do not hesitate to contact either Nick Hanigan on 0419 992 069 or the undersigned on 0429 102 079.		
17	Element Advisory on behalf of Hawaiian Group	<p>Introduction/context Element Advisory has prepared this submission on behalf of Hawaiian Group (Hawaiian) on the Cable Beach Precinct Structure Plan (CBPSP), Chinatown-Old Broome Precinct Structure Plan (COBPSP) and the Shire Of Broome Local Planning Scheme No. 7 - Scheme Amendment No. 1, all of which are currently being advertised by the Shire of Broome (the Shire).</p> <p>Hawaiian has reviewed the CBPSP, the COBPSP and Scheme Amendment No. 1 to ascertain how these will impact both on Hawaiian’s current property interests as well as their future plans.</p> <p>Hawaiian’s comments on the specific parts of the COBPSP follows. Figure 2: COBPSP – Structure Plan Map</p> <p>a. Rezoning and Development Potential – objection to the rezoning from ‘Mixed Use’ to ‘Residential’.</p> <p>As noted above in relation to Scheme Amendment No.1, Lots 3 and 360 Hopton Street and Lots 361 and 362 Walcott Street are proposed to be rezoned from Mixed Use (R40) to Residential (R50) in the Structure Plan Map.</p> <p>Hawaiian objects to the proposed rezoning of this privately owned land from Mixed Use to Residential on the basis that the development controls which are proposed to apply to the</p>	<p>The Shire acknowledges the comprehensive submission provided by Hawaiian. Responses to the various issues raised in the submission are provided as follows.</p> <p>a. Rezoning and Development Potential objection to the rezoning from ‘Mixed Use’ to ‘Residential’.</p> <p>It is acknowledged that Hawaiian objects to the proposed rezoning of the subject sites from Mixed Use (R40) to Residential (R50).</p> <p>Reinstating the zoning of these sites to Mixed Use is partly supported for the following reasons:</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 – Figure 3: COBPSP – Residential Density Plan;</p> <p>P1-Figure 6: Chinatown Sub-Precinct Requirements</p> <p>Figures modified to change the zoning of Lot 360 (No. 15) Hopton Street, Lots 361 (No. 84) and 362 (No. 86) Walcott Street, and Part Lot 3 (No. 21) Hopton Street from ‘Residential R50’ to ‘Mixed Use R50’.</p> <p>Section 1.2.2. Interpretations New definition for consolidated site</p>

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		<p>Residential Zone under the COBPSP all limit the overall quantum of floor area able to be developed on the site when compared to the Mixed Use Zone having regard to:</p> <ul style="list-style-type: none"> • Height limits – three (3) storeys with up to five (5) storeys considered under the bonus criteria in the Mixed Use Zone and only two (2) storeys in the Residential Zone. • Site cover provisions – 60% in the Mixed Use Zone and 50% for lots less than 2,000m2 or 60% only for lots 2,000m2 or more in the Residential Zone; • Soft landscaping requirements – 20% in all other zones and 30% for residential development. • Primary and secondary street setback controls – 2m in the Mixed Use Zone and 3m in the Residential Zone. <p>This is a large site that has the ability to deliver new mixed use development in a manner and form that is consistent with the objectives of the COBPSP. It is also close to Town Beach and can readily integrate with the Mixed Use development proposed to Robinson Street without adversely impacting the residential properties on Walcott Street. It is considered more appropriate that the site remain in the Mixed Use Zone, but be re-coded to R50 consistent with the re-coding being applied to all the land between Walcott Street and Town Beach.</p>	<ul style="list-style-type: none"> • One of the primary drivers of rezoning the subject sites from mixed use to residential was to consolidate mixed-use and commercial activity along Hamersley / Robinson Streets adjacent to Roebuck Bay and Town Beach. These are generally sites located away from low density residential areas, which have the ability to activate the key north-south spine and optimise views over Roebuck Bay. <p>The Shire maintains its position that consolidating commercial / mixed use development on Hamersley Street is still the preferred outcome.</p> <ul style="list-style-type: none"> • To the north and west, Hawaiian’s landholdings interface with low density R10 / R30 uses. The area to the north has been retained at R10 to support preservation of the existing Old Broome Character. A Mixed Use Zoning which would allow commercial activity and heights up to 5 storeys is therefore not supported in this location. <p>The Shire instead proposes a modified solution where Lot 360 (No. 15) Hopton Street, Lots 361 (No. 84) and 362 (No. 86) Walcott Street, and Part Lot 3 (No. 21) Hopton Street are rezoned from ‘Residential R50’ back to ‘Mixed Use R50’. This will allow potential activation of vacant sites at the corner of Hopton and Walcott Streets.</p>	<p>P1 - Table 7: COBPSP Streetscape Requirements Modify maximum fence height to align with R-Codes. Retain permeability requirements.</p> <p>Part One – Section 2.2.9 Introduce new Clause 3 (c)</p> <p>Any parking bays which are required as a condition of development approval that cannot be provided on-site, the decision maker at its discretion, may allow these to be developed in a portion of the abutting road verge. If approved, it is the applicant’s responsibility to design and construct the parking bays in accordance with the Shire’s ‘Guidelines for Construction or Reinstatement’.</p> <p>Section 3.3.1. P3 Development Requirements</p> <p>Mixed Use: 5 storeys may be considered on sites which</p>

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		<p>b. Section 2.2.2 Building Heights – Bonus Height Criteria The words “single consolidated site” in sub clause (a) of this provision may be construed to mean a single lot. It is suggested that this sub clause include an additional provision to reflect the ability to consolidate lots as a condition of development approval. It is suggested the statement “(or have the ability to be consolidated)” could be inserted after the words “single consolidated site”. This would clarify the intent of this clause.</p> <p>c. Fencing Requirements - Front Fence Heights It is noted that the residential fencing provisions state that all fences within the primary street setback areas shall be no higher than 1.2m.</p> <p>Provided that the 80% minimum permeability provision is achieved it is considered strongly desirable, noting the need for security and privacy, that higher fencing be permitted. The R Code Volume 1 provisions are preferable in this respect, noting the R Codes</p>	<p>To mitigate potential impacts of bulks and scale, the height limit in this area will be capped at 3 storeys, despite being zoned mixed use.</p> <p><i>Note: See below for commentary regarding soft landscaping and building heights.</i></p> <p>b. Section 2.2.2 Building Heights – Bonus Height Criteria The intent of this matter is understood and supported. It is proposed that a definition for ‘consolidated site’ be included in Section 1.2.2 Interpretations as follows:</p> <p><i>“Consolidated Site” refers to any property or properties that form part of a single development application. This can include more than one site where it can be demonstrated that the properties are in sole ownership and/or that an agreement has been reached between all individual landowners who form part of the development application”.</i></p> <p>c. Fencing Requirements - Front Fence Heights The intent of this matter is understood and supported. The 80% permeability requirement will be required to be retained from a climatic design perspective. However, increasing the maximum fence height to 1.8m to align with the now gazetted R-Codes Volume 1 is supported.</p>	<p>are located on Robinson Street subject to Clause 2.2.2 (2).</p>

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		<p>Volume 1 provides that front fences within the primary street setback area are visually permeable above 1.2m of natural ground level. Not that the overall fence height is limited to 1.2 metres. Safety and security are highly valued in Broome and therefore taller front fences should reasonably be permitted.</p> <p>d. Landscaping Requirements - Soft Landscaping Percentages The soft landscaping percentages for all land uses are noted as being notably higher than the equivalent R Code Volume 1 requirements. In particular the 30% soft landscape requirement for single houses, grouped dwellings and multiple dwellings is likely to affect the development feasibility of these land uses and should be carefully reviewed.</p> <p>The Tourism, Regional Centre (Commercial Sub Precinct) and All Other Zones provisions of 20-25% soft landscaping is also high and may impact on the feasibility of these types of development. Have these requirements been sufficiently tested with contemporary development outcomes to give the Shire certainty that they can be practically achieved? It is respectfully requested that the minimum soft landscaping requirements be reduced or refined to relate to percentages within particular setback areas (i.e. the front setback) or to more narrowly defined parts of the site rather than as blanket percentages which apply to the total site area.</p>	<p>A modification to P1 - Table 7: COBPSP Streetscape Requirements to reflect this change is therefore proposed.</p> <p>d. Landscaping Requirements - Soft Landscaping Percentages The concerns raised regarding the feasibility of the proposed 30% landscaping requirement for residential uses and 20-25% for other zones is understood.</p> <p>However, modifications to the COBPSP's proposed standards are not supported. The green landscape character of the COBP was identified as one of the most important design elements during Community and stakeholder engagement. In response, site cover and soft landscaping were a primary focus of the built form strategy for the COBPSP. Minimising site cover and maximising soft landscaping is essential in maintaining high quality tree canopy in the private realm, assisting with water management, and contributing to local character.</p> <p>Part Two demonstrates that design testing was undertaken for a range of lot types to ensure that these outcomes can be achieved.</p>	

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		<p>e. Parking and Vehicle Access - Visitor Parking Requirements Clause 3(b) states that visitor parking must be accommodated on site. It is respectfully requested that the Shire re-visits this provision to acknowledge that there may be suitable locations where visitor parking could be provided within adjacent road reserves / verges where it is convenient and accessible.</p> <p>This is considered to be appropriate within Old Broome where many of the road reserves are very generous and wide (circa 40m) and could readily facilitate streetscape upgrades as part of development incorporating landscaping and visitor parking. It is noted that there is a provision in the CBPSP that allows for the use of the road reserve for car parking at the Shire’s discretion. A similar provision should be provided for in the Old Broome area.</p> <p>f. Building Heights in Town Beach (R50 Zone) The maximum building height for the Residential R50 Zone is limited to two (2) storeys, overriding the R Codes Volume 1, which allows for three (3) storeys in R50 areas. This limitation, combined with lower maximum site cover percentages (50-60% rather than 65%) and greater primary front setback controls (3 metres rather than 2 metres) combine to further limit the development potential of the lots under the R50 provisions. Allowing three (3) storeys assists in achieving lower site cover provisions and greater setback controls as it provides greater flexibility to use height rather than site cover to achieve equivalent floor space outcomes.</p>	<p>If individual landowners wish to vary these requirements, then this is to be managed and justified through the development application process.</p> <p>e. Parking and Vehicle Access - Visitor Parking Requirements It is still the Shire’s preference that vehicle parking be accommodated on-site wherever possible, so as to ensure that parking in verge areas does not dominate streetscapes.</p> <p>The Shire has identified that Clause 2.2.9 3 (b) does conflict with Council’s position on verge parking as set out in Local Planning Policy 5.6. The Shire supports the intent of this part of the submission and will introduce a new clause to allow greater flexibility.</p> <p>f. Building Heights in Town Beach (R50 Zone) The Shire appreciates and supports the intent of ensuring that development within the Residential R50 Zone is consistent with the overarching objectives of the precinct. Given the strategic location of these lots and their potential to contribute meaningfully to the area’s urban character and functionality.</p> <p>We therefore agree that the maximum building height for the Residential R50 Zone should revert</p>	

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		<p>Conclusion We trust the comments provided will assist the Shire in reviewing the advertised documents.</p> <p>We urge the Shire to make amendments, as requested, to ensure that the PSPs provide for an appropriately flexible and robust planning framework that provides the necessary impetus to support renewed investment in, and revitalisation of, Cable Beach and the Broome townsite.</p> <p>We welcome any feedback on this submission and would be happy to arrange a meeting to discuss in greater detail. Should you have any queries or require clarification on the above matter, please do not hesitate to contact either Richard Kilbane on 407 997 411 or the undersigned on 0429 102 079.</p>	<p>back to the R-Codes Volume 1 standard of three (3) storeys. This adjustment aligns with the broader planning framework and ensures sufficient flexibility to achieve optimal development outcomes. The allowance for three storeys will facilitate achieving the desired lower site cover percentages and increased setback controls by leveraging height to maintain equivalent floor space.</p>	
18	Beverley Long	<p>Having lived and raised a family in Old Broome for 25 years what captivated my heart was the unique character and ambience defined by the R10 blocks. Lushly vegetated gardens with many large trees, the heritage and architecture of the old homes surrounded by the large verges and breezeways. Over the years I have seen many of the older houses lovingly restored and renovated, often by young families, retaining the character, history and amenity of this distinctive area.</p> <p>The Shire has consistently supported mine, and many others' submissions, to various planning strategies, schemes and structure plans over many years, agreeing that the essence of the unique Old Broome character is best preserved by retaining the R10 zoning. This is why the Old Broome Special Character Area was</p>	<p>The concerns regarding potential impacts of infill development as a result of the COBPSP zoning changes are noted.</p> <p>The background reporting has demonstrated that with the proposed zoning changes, the precinct could accommodate between approximately 300-1,000 additional dwellings across the 133 hectares precinct. The delivery of well-located housing in existing areas of the Broome Townsite remains a priority of the Shire to help alleviate the housing crisis, aligning with the intent of the Shire's Local Planning Strategy. Through its draft Local Planning Strategy, the Shire has carefully considered all alternative locations for future urban growth with</p>	<p>That the submission be noted.</p> <p>P1-Figure 2 Structure Plan Map</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan</p> <p>Show Category 1-2 local heritage sites.</p> <p>Figures modified to rezone Lots 197 (No. 17), 198 (No. 13), and Lot 199 (No. 11)</p>

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		<p>implemented, and why the area was designated to continue with R10 zoning.</p> <p>There are other newer parts of Broome where an increase in housing density is more desirable and less costly to implement. For example the block of land on the corner of Robinson and Stewart Streets was recently subdivided resulting in the clearing of all vegetation to accommodate the massive amount of earthworks required for sewerage ,and drainage. To say that infill development can be implemented to ensure the existing landscape character of Old Broome can be protected is false and misleading.</p> <p>I strongly feel the current proposal of increased density to R30, R40 or R50 within the Old Broome Special Character Area will be forever detrimental to the character of the town. When it's gone it is lost forever.</p>	<p>multiple opportunities identified. The benefit of the COBPSP is that it provides a short-medium term opportunities for housing growth, in areas which can make better use of existing infrastructure.</p> <p>Extent of Zoning Changes Regarding the extent of the rezoning, of the 146 properties identified as being R10 (currently):</p> <ul style="list-style-type: none"> • 69 Properties are retained as R10 (47%) • 51 Properties are zoned from R10 to R30 (35%) • 26 Properties are zoned from R10 to R50 (18%) <p>The Shire has tried to ensure a balanced approach, with the areas being upcoded proposed primarily east of Walcott Street.</p> <p>Character Protection The concerns around how future development will impact on landscape character are understood. The following points are provided:</p> <ul style="list-style-type: none"> • The Structure Plan once approved will be a Western Australian Planning Commission endorsed document. The document will provide stronger guidance than the existing framework which has seen individual sites in the Old Broome Special Character Area spot rezoned and R-Code compliant solutions 	<p>Anne Street, from 'Residential R30' to 'Residential R10'.</p>

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			<p>delivered which have removed trees and provided minimal landscaping.</p> <ul style="list-style-type: none"> • A key principle of the COBPSP is to maintain the prominent tree canopy. It is acknowledged that with redevelopment some trees may be lost in the short-term, however, the planning framework includes landscape and open space controls which will ensure that new development is supported by planting of trees. • Contemporary planning systems are supported by design review and other mechanisms to ensure design quality is at the forefront of good planning decisions. The Shire has a Design Review Policy in place and relevant proposals will be referred to the Design Review Panel to ensure the integrity of the COBPSP planning controls are maintained. <p>Finally, the R-Codes Volume 1 (which will apply throughout the COBPSP) were updated in 2024. The base standard of medium density development is expected to improve as a result, with substantially greater emphasis now placed on sensitive infill development which is conscious of its individual site and surrounding context.</p>	
19	Water Corporation	Thank you for your letter dated 30 September 2024. We offer the following comments regarding this proposal.	The Shire acknowledges the intent of the submission provided by the Water Corporation. The following responses are raised:	That the submission be noted.

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		<p>Water Reticulated water is currently available to the subject areas. Due to the increase in development density, upgrading of the current system may be required to prevent existing customers being affected by the future development. We will need to review our scheme planning to determine if our infrastructure needs upgrading due to the increase in development density. We have initiated that review, but it may take some time to get a result.</p> <p>Any upgrading of our headworks infrastructure will be undertaken at the cost of the Water Corporation. But all reticulation upgrades need to be borne by the future developer.</p> <p>If it is determined that our reticulated infrastructure needs upgrading it is recommended that a developer contribution scheme be established by the Shire of Broome. This is so a coordinated development approach is taken instead of individual landowners being responsible for the significant upgrades that may make their development unaffordable.</p> <p>All water main extensions, if required for the future development, must be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.</p> <p>Wastewater Reticulated sewerage is currently available to the subject areas. Due to the increase in development density, upgrading of the current system may be required to prevent existing customers being affected by the future development. We will need to review our scheme planning to determine if our infrastructure needs</p>	<p>Water Supply The Shire appreciates the insights provided regarding the existing availability of reticulated water and notes the additional information from the Water Corporation confirming that the increase in densities will not trigger headwork upgrades.</p> <p>Wastewater The Shire appreciates the insights provided regarding the existing availability of reticulated sewerage and notes the additional information from the Water Corporation confirming that the increase in densities will not trigger headwork upgrades.</p>	<p>No change recommended.</p>

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		<p>upgrading due to the increase in development density. We have initiated that review, but it may take some time to get a result. Any upgrading of our headworks infrastructure will be undertaken at the cost of the Water Corporation. But all reticulation upgrades need to be borne by the future developer.</p> <p>If it is determined that our reticulated infrastructure needs upgrading it is recommended that a developer contribution scheme be established by the Shire of Broome. This is so a coordinated development approach is taken instead of individual landowners being responsible for the significant upgrades that may make their development unaffordable.</p> <p>All water main extensions, if required for the future development, should be laid within the existing and proposed road reserves, on the correct alignment and in accordance with the Utility Providers Code of Practice.</p> <p>It should be noted that existing sewerage mains are located within private property in the subject areas. Some are protected by Water Corporation easements. Due consideration will be required when developing in these areas. The developer is required to fund the full cost of protecting or modifying any of the existing infrastructure which may be affected by any future development. In accordance with Section 90 of the Water Services Act 2012 whenever development is proposed near Water Corporation assets the applicant/developer/owner needs approval prior to construction. This should be done by submitting an Approval of Works application. For information about this application please follow this link:</p>		

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		<p>https://www.watercorporation.com.au/home/builders-and-developers/working-near-our-assets/approval-for-works</p> <p><i>Note: Water Corporation provided updated information since the close of the comment period. Water Corporation have advised that the increase in densities proposed Water Corporation headworks will not need to be upgraded.</i></p> <p><i>Individual developers could be required to undertake some reticulation works (new works) for their individual developments if they require large services such as a fire service. But until the developer provides their service request at the time of development we cannot determine if any new works are required. Those works if required would be funded by the developer.</i></p> <p><i>The density increases will therefore not impact existing customers.</i></p>		
20	Lesley Westlake	<p>Address: U4/1 Saville Street Broome W.A 6725 to be rezoned Mixed Use R50</p> <p>a. Volume of Traffic and parking Beyond Guy Street, Robinson Street carries a large volume of traffic to and from Town Beach.</p>	<p>The submission intent is acknowledged, with concerns regarding traffic, stormwater management, public views, mixed-use development, community character, and infrastructure for locals identified. Responses to the various issues raised are provided below.</p> <p>a. Volume of traffic and parking The Shire is aware that events and markets at Town Beach contribute to traffic congestion and overflow parking on verges, exacerbating local inconvenience. The Shire is exploring ways to mitigate these issues, though it should be</p>	<p>That the submission be noted.</p> <p>No change recommended</p>

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		<p>How will the Shire of Broome manage the parking of vehicles for events and markets at Town Beach when the verges are now full to overflowing with cars seeking parking?</p> <p>b. Protecting Public Views Currently I am able to view the water in the bay. As both sides including 69 Robinson Street fall within the proposed zoning, this view will be lost.</p> <p>c. Storm Water Management The intersection of Robinson and Saville (C1 .1.3) floods after each rain. How does the Shire of Broome intend to protect the infrastructure and assets from major storm and flooding events? It currently struggles with the existing drainage for run off, let alone if R50 mixed use proceeds to 2.2.2 building heights/section 3, p.1 figure 6, p1 figure 12?</p> <p>d. Loss of Broome’s unique character</p>	<p>acknowledged that they only occur at these specific times.</p> <p>b. Protecting Public Views All parking from private development sites will be accommodated on site. Therefore any new dwellings in these areas are not expected to exacerbate on-street parking issues during events.</p> <p>Protection of views from private development sites is not a valid planning consideration. Public views from key streets such as Guy, Hopton, Louis, and Anne Streets have been retained.</p> <p>c. Stormwater Management The Shire is aware of existing issues associated with flooding throughout the COBP. Where infrastructure upgrades are required to be delivered, this will be addressed in future capital works programs.</p> <p>The Water Management Strategy prepared as an Appendix to the COBPSP provides the necessary strategies and actions to mitigate these issues. This also includes a requirement for individual landowners to prepare Urban Water Management Plans on larger sites.</p> <p>d. Loss of Broome’s Unique Character The Shire recognises that Broome’s identity is deeply tied to its unique architectural, cultural, and</p>	

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		<p>If to proceed allows more intense development character, more urban edges with mix of tourism and commercial fronting the street edge should present in 2-3 stories to the street with the ability to go up to 5 stories for selected sites:</p> <p>How and why should any further commercial and/or tourism site be permitted?</p> <p>Broome style design will not compensate for the loss of Broome character that is hanging by a thread. The long-standing locals of Broome do not wish to live in a town that's focus is purely on tourists. Businesses struggle in non- tourist season, do not set up more to fail.</p> <p>The locals mourn the loss of the character of Broome. Improve and build infrastructure that supports the locals, e.g a purpose -built community centre and a staged retirement village, so that the ageing may choose to live out their days in an affordable Broome.</p> <p>Current and future planning decisions have forced personnel to leave" this town by the bay" because it is no longer affordable to stay.</p> <p>We are not miners, we live modestly, we pay the highest rates of any Shire in W.A. Broome cannot sustain its growth through current infrastructure and does not want story upon story of high rise to placate those with money to splash on events that have priced the Broome Locals out of attendance. Slow down, improve and consolidate, and listen to the locals.</p>	<p>social fabric, however, as the Town evolves planning must maintain a forward-looking focus.</p> <p>The extent of zoning changes in the COBPSP has been minimised and focussed in targeted areas such as along Hamersley Street and Robinson Street due to their proximity to Roebuck Bay and Town Beach.</p> <p>There are many examples of 2-3 storey developments across the precinct and this scale and type of development is encouraged to continue in these targeted areas. The ability to reach 5 storeys is not 'as of right' and landowners will need to satisfy a range of criteria before this can even be considered by the Shire.</p> <p>Carefully integrating buildings with landscape is a core focus of the COBPSP, as landscape already plays such a vital role in the precinct.</p>	

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21	Nyamba Buru Yawuru Ltd 55 Reid road Cable Beach	<p>Introduction/context ADDRESS OF PROPERTY AFFECTED (if applicable). (Include lot number and nearest street intersection).</p> <ul style="list-style-type: none"> • Lots 484 & 100 Chapple Street • Lots 2074, 2075, 2076, 2077 & 2078 Chapple Street • Morgan’s Camp: Lots 3092 Chapple Street • Kennedy Hill: <ul style="list-style-type: none"> ▪ Lot 3061 Frederick Street ▪ Lot 52 Dampier Terrance ▪ Lots 520 & Lot 1219 Carnarvon Street – ▪ Portion of Lot 100 Frederick Street ▪ Portion of Reserve 15019 on Carnarvon St ▪ Lots 3000, 144, 145 and 146 Carnarvon St & lots 150 & 149 Haas Street • Lots 72 & 71 Frederick Street • Lot 2828 Hamersley Street: to be transferred to Yawuru PBC (existing Broome Prison) after the facility relocated. <p>a. Lots 484 & 100 Chapple Street R Codes for single dwellings should consider apartment dwelling types, in which Nyamba Buru Yawuru suggest similar building form that is on Lot 474 should be parallel to Chapple Street streetscape design, for future residential developments and easing housing pressures in the Broome region.</p> <p>The densities proposed as part of the PSP are considered sound with potential to increase zoning to higher than R50 in some strategic locations for the intended purposes for easing housing pressures.</p>	<p>The Shire thanks Nyamba Buru Yawuru for the submission. Responses to the issues raised and the specific areas they apply to are summarised below.</p> <p>a. Lots 484 & 100 Chapple Street The Shire acknowledges the concerns raised regarding the proposed rezoning of these properties, and their designation as an erosion risk area. The reasoning behind this rezoning is grounded in the findings of the Shire’s Broome Townsite Coastal Hazard Risk Management and Adaptation Plan (CHRMAP) and the associated risks posed by coastal erosion north of Gray Street, including the area encompassing these properties.</p> <p>The Shire understands that there is a request to remove the erosion risk classification due to the</p>	<p>That the submission be noted.</p> <p>P1 – Figure 2: COBPSP - Structure Plan Map;</p> <p>P1 - Figure 5: COBPSP - Residential Density Plan;</p> <p>P1 - Figure 11: Commercial Sub-Precinct Requirements</p> <p>Figures modified to rezone Part Lots 71 and 72 Frederick Street from ‘Residential R50’ to ‘Mixed Use R50’.</p> <p>Figures modified to rezone Lots 2076 (No. 14), 2075 (No. 16), and 2074 (No.18) Chapple Street from ‘Foreshore’ reserve to ‘Residential R10’.</p> <p>P2-Figure 8: Culture, Values Identity</p> <p>Figure updated to include ‘Kennedy Hill’ and</p>

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		<p>The current classification of the land as an erosion risk area does not account for the significant mitigating impact of the existing mangrove system.</p> <p>Mangroves are important in stabilizing shorelines and reducing erosion, thereby enhancing the land's resilience. We request that the erosion risk classification be removed and that the landowner be allowed to undertake a thorough assessment to demonstrate the land's capability for development. If the risk area classification is to be retained, we request that the PSP notes that if an assessment confirms the land's suitability for development, the Shire will support its removal from the erosion zone designation.</p> <p>Broome has a unique environment with the mangrove system ranging across most of the eastern, and southern corridor of Chinatown and Old-Broome area where services, commercial and residential properties are situated. A report put together by Wetlands International and the Nature Conservancy suggests that mangroves may contribute to reducing loss of life and damage to property from storms and cyclones as they reduce the impacts of waves, storm surges and high winds – you can read more on the report</p> <p>Additional to mangroves, NSW Government Primary Industries Department found that mangroves act as a buffer, protecting coastal land by absorbing the energy of tidal currents and storm driven wind and waves that prevents erosion. Actions from major storm and wave events, such as Cyclone Tracy in Darwin and the tsunami in Asia in 2004 have shown the importance of mangrove forests in reducing storm damage to fragile coastlines and property – you can read more about the report here.</p>	<p>potential stabilising role of mangroves. The Shire is undertaking a review of the Broome Townsite CHRMAP, the outcomes of this process will determine whether the erosion risk of this area can be reclassified.</p> <p>The Shire acknowledges the ecological and protective importance of mangroves in reducing erosion and storm damage is important, however, this is not adequately allowed for in State Planning Policy 2.6 – Coastal Planning. The Shire's CHRMAP needs to satisfy the requirements of the provisions set out in this State Policy.</p> <p>It is noted that a review of the CHRMAP is in the process of being undertaken. Rezoning of the sites in advance of the CHRMAP review is not recommended.</p> <p>It should be noted that the sites in question would have to address coastal planning constraints which is likely to limit redevelopment opportunities, regardless of the zoning.</p> <p>The submission request to retain the Regional Centre zoning over the site is supported.</p> <p>Furthermore, the Amendment is proposing to rezone Lots 2076 (No. 14), 2075 (No. 16), and 2074 (No.18) Chapple Street from 'Foreshore' reserve to 'Regional Centre'. As these sites are not Crown</p>	<p>'Morgan's Camp' as culturally sensitive sites.</p>


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		<p>b. Cultural Heritage recognition – Chapple Street, Kennedy Hill and Morgan’s Camp</p> <p>The Chinatown-Old Broome PSP seem to focus on the commercial protection context of Chinatown-Old Broome with no consideration of the cultural heritage values of the area identified in the Chinatown-Old Broome Precinct Structure Plan. This applies over areas that are culturally significant on Kennedy Hill’s and Chapple Street that Yawuru Lore Bosses consider this site to be culturally significant to Yawuru and non-Yawuru people. Suggest that the protection of sites with cultural heritage values are taken into account.</p>	<p>Reserves it is recommended that they be retained with the Regional Centre zoning. This approach is consistent with all other freehold lots located on Chapple Street noting that development on these lots would have to address coastal planning considerations.</p> <p>b. Cultural Heritage recognition – Chapple Street, Kennedy Hill and Morgan’s Camp</p> <p>The Shire supports the intent of this element of the submission, and recognise the importance of ensuring culturally sensitive sites are acknowledged and protected.</p> <p>The two sites specifically referenced are ‘protected’ from inappropriate development as they are identified as reserves under the PSP and Scheme Amendment. Sites of cultural significance are also protected under the Aboriginal Heritage Act.</p> <p>Part 2 of the Precinct Structure Plan under section 1.2.5 provides the context of the cultural significance and while it mentions Roebuck Bay, the foreshore areas and Kennedy Hill as being culturally significant, it does not reference Morgans Camp. This will be updated.</p> <p>To address this concern, a recommendation is to identify culturally significant sites, such as those at Kennedy Hill and Morgan’s Camp, in Part 2 of the COBPSP.</p>	

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		<p>c. Lot 2828 Hamersley Street – Broome Prison Nyamba Buru Yawuru consider that Lot 2828 in which the Broome Prison facility exist on to be identified as ‘Mixed Used’ so it provides an opportunity to maximise future development opportunities and benefit the Broome community, once the Broome custodial facility is relocated. Further suggestion to rezone all lots within the block to be Mixed Use zoning to ensure consistent development.</p> <p>d. Lots 72 and 71 Frederick Street Rezoning Frederick St, Lot 72 & 71 to ‘Mixed-Use’ so it provides an opportunity to maximise future development opportunities and benefit the wider Broome community, within the appropriate development type for commercial, services or residential proposal.</p>	<p>This approach would ensure that the cultural heritage values of these areas are recognised, helping to guide future development in a manner that respects and preserves their significance for both Yawuru and non-Yawuru people.</p> <p>c. Lot 2828 Hamersley Street – Broome Prison Unfortunately, despite the Shire’s Local Planning Strategy advocating for the relocated Broome Custodial Facility, until this process is further progressed it is unlikely that the State Government will support rezoning the existing site to Mixed Use.</p> <p>Once the Broome custodial facility is relocated, the Shire supports the intent to rezone this site to Mixed Use to maximise future development opportunities.</p> <p>d. Frederick Street (Lots 72 & 71) The Shire supports the intent of rezoning these lots to ‘Mixed-Use’ to enable flexible development options benefiting the broader community. A split zoning was not the intention.</p> <p>A modification to both the COBPSP Structure Plan Map and Scheme Maps are recommended.</p>	

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		 <p>e. Parking Greater consideration should be given to available parking within the Chinatown/Old Broome PSP, especially around the Kennedy Hill area where NBY is looking to develop a Cultural Centre. More parking in the area will allow for more flexibility in the development of the area and increase public accessibility.</p> <p>f. Affordable housing Housing pressures can also be addressed by incorporating planning provisions within Part 1 of the PSP that requires certain percentages of dwelling yield to be dedicated to affordable housing.</p>	<p>e. Parking The COBPSP acknowledges the need to review the parking situation to support the proposed Cultural Centre. This is contained in P1-Table 2 as a short-term action. The ultimate quantum and arrangement of parking needed to service the Cultural Centre would need to be resolved at development stage.</p> <p>f. All Properties - Affordable Housing The Shire supports the intent that more affordable housing would be a benefit to the Broome community. However, mandating and enforcing affordable housing percentages can be an inhibitor to future development. The zoning changes proposed as part of the COBPSP will unlock many properties for medium density development. The potential for smaller dwellings will hopefully fill a gap in the market by providing housing types which support greater diversity and potentially affordability.</p>	

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		<p>g. Density transitions Greater consideration should be taken to explore the transition of densities within the Chinatown/Old Broome PSP, especially where there is a big jump in zonings e.g. R50 to R10. The interface between the lots as well as their interface to the street/public realm should be explored to ensure that it aligns with the intended street/precinct character.</p> <p>Suggestion to up code R10 within the PSP to at least R25 to allow for a smoother transition between low, medium, and mixed used density developments within the PSP area as well as existing low density residential developments outside of the PSP area.</p>	<p>g. Density Transitions The recommendation to upcode R10 areas to R25 is not supported. The primary intention of the COBPSP is to maintain the majority of residential development at a low scale, reflecting community sentiment for the retention of R10 zoning and the preservation of the existing character of the area.</p> <p>Additionally, the PSP proposes a reduced building height for R50 residential areas in P5 – Old Broome Residential with a reduction from 3 storeys to 2 storeys, which is a variation to the R-Codes. This approach will help to provide a more compatible transition between varying densities.</p> <p>While the interface between different zones, such as R50 and R10, is acknowledged as an important design consideration, the retention of an R10 zoning for many properties in the precinct aligns with this transitional approach. Enhancing transitions through design measures, such as landscaping and building setbacks, will be prioritised over upcoding to achieve smoother integration.</p>	
22	Department of Planning, Lands and Heritage (Heritage)	<p>The proposed Scheme Amendment and Precinct Structure Plans have been considered for their potential impact on heritage places within the Scheme area and the following advice is given:</p> <ol style="list-style-type: none"> 1. We recommended that the Shire develop a specific Local Planning Policy (LPP) for P291 Chinatown Conservation Area that underpins the strategy for the conservation and future 	The Shire has undertaken a review of the considerations identified by the Department of Planning, Lands and Heritage. Responses to those relevant to the Chinatown-Old Broome PSP are summarised below.	<p>That the submission be noted.</p> <p>No modifications proposed.</p>

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	140 William Street, Perth WA	<p>development of the area. The LPP would be used to guide the formation of new development proposals and specify design considerations and criteria against which development proposals will be assessed.</p> <ol style="list-style-type: none"> 2. 'Local Planning Policy 5.4 – 'Heritage List – Development of Listed Places', is referred extensively in the COBPSP. Given the potential impact on heritage places within the COBPSP area, the Shire should consider strengthening this policy and reviewing it against the current Heritage Council guidelines. 3. As there are no State Registered Heritage Places within Cable Beach (Planning Area C), there is no objection to the Cable Beach Precinct Structure Plan from a historic heritage perspective. <p>We hope that these comments are of value in the development of the proposed Scheme Amendment and Precinct Structure Plans and welcome further discussions regarding an LLP for the area and the possible delegation policy.</p>	<p>Local Planning Policy for Chinatown Conservation Area (CCA)</p> <p>The CCA has been included on the State Heritage Register and the Shire's Municipal Heritage Inventory for many years and predates the introduction of Heritage Area provisions into the Model Provisions under the Planning and Development (Local Planning Schemes) Regulations 2015. The Shire has not designated the CCA as a heritage area under Regulation 9, given it is already included under the State Heritage Register and the Shire Municipal Inventory.</p> <p>The Shire has undertaken multiple revisions of Development Strategies and Design Guidelines for the CCA, one prepared in 2003 which was reviewed again in 2013. The Precinct Structure Plan is a review of these documents, it incorporates the Design Guidelines into one consolidated planning document that provides guidance for development in the CCA. It is the Shire's preference to maintain one consolidated planning framework, rather than introduction of a LPP that it likely to duplicate provisions.</p> <p>The Shire maintains its underlying intent to simplify the local planning framework by avoiding duplication where possible.</p> <p>LPP 5.4 – Heritage List – Development of Listed Places</p>	

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			<p>The Shire reviewed this Local Planning Policy at the May 2024 Council Meeting and gave consideration to the March 2023 Guidelines.</p> <p>No modifications are proposed to the COBPSP as a result of this review.</p>	
23	<p>Department of Water and Environmental Regulation</p> <p>27 Victoria Highway Kununurra</p>	<p>The Department of Water and Environmental Regulation (the Department) has reviewed the scheme amendment and the Precinct Structure Plans. Detailed comments were provided in an attached table.</p> <p>For the Chinatown-Old Broome Precinct Structure Plan, the following was identified:</p> <p>Chinatown Core Rezoning The Department supports the Chapple Street lots being rezoned to Foreshore, consistent with the Shire’s Coast Hazard Risk Management and Adaption Plan (CHRMAP).</p> <p>Environmental Management Plan Where native vegetation clearing exemptions apply under the <i>Environmental Protection Act 1986</i>, the Department recommends the following principles be applied to clearing activities;</p> <ul style="list-style-type: none"> a) avoid the clearing of native vegetation; b) minimise the amount of native vegetation to be cleared; and c) reduce the impact of clearing on any environmental value. <p>Proponents should also keep records of:</p>	<p>The Shire has undertaken a review of the considerations identified by the Department of Water and Environmental Regulation. Responses to those relevant to the Chinatown-Old Broome PSP are summarised below.</p> <p>Chinatown Core Rezoning The Department’s position is noted and supported.</p> <p>Environmental Management Plan The intent of this recommendation is supported, the Shire proposes to modify the requirements for Environmental Management Plans expanding the requirements to include the items identified by the Department of Water and Environmental Regulation.</p>	<p>That the submission be noted.</p> <p>P1 - Table 14: Additional Information Requirements</p> <p>Expand requirements relating to the Environmental Management Plan.</p>

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CHINATOWN OLD BROOME PRECINCT STRCUTRE PLAN**

No.	Submitter	Summary of Submission	Local Government Response	Local Government Recommendation
		<ul style="list-style-type: none"> • clearing exemption that was used to undertake the clearing activities • the location where the clearing occurred • the date that the area was cleared; • the size of the area cleared (in hectares); • photograph evidence of the area cleared before and after <p>The above principles could be incorporated into the Environmental Management Plans required by the Shire at development stage.</p>		