13.1 Macmillan Precinct Concept Plan – Public submission summary

No.	Submission received	Officer's response	Amended – Y/N
1	1. Although I agree with the intent, I believe the current state of Kent ST with regards to traffic and its non-pedestrian friendly nature is not conducive or suitable to accommodate what is proposed. However, if traffic is calmed/diverted from Kent ST adjacent to John MacMillan I believe the proposed developments may be possible.	 Kent Street, between Gloucester St and Albany Hwy, is classed as a District Distributor B (DB) road classification. Under the Main Roads 'Roach Hierarchy for WA' a DB road is listed as having a high level of connectivity between primary and other distributor roads and high traffic volumes travelling between industrial, commercial and residential areas with a recommended operating speed of 60 – 70 km/h. Residential and commercial access is allowable but preferred to be limited where possible. Detailed traffic management and movement network planning through the masterplanning stage will appropriately address Kent St interface with the Precinct. 	N
2	I support the draft concept	Noted	N
3	I oppose the draft concept	Noted	N
4	 I support the draft concept Maintaining existing trees and green spaces are important to the community so increasing them is appropriate. I think that most of the important elements from the various scenarios have been combined in the proposed draft concept, especially the connectivity. I think that there needs to be really clear communication as to how private development can both help fund the project and bring vibrancy e.g. bars, cafes and restaurants on lane ways. I think that the public at large fail to grasp how this private investment is both financially and culturally appropriate. I also think that there needs to be some very clear communication on the benefits of the consolidated and stacked community hub - ease of use, increased efficiency etc. but also on how this connects directly with increased green space and improved economy by making 	Noted	N

	more space available for private development i.e more bang for buck. The new Belmont Hub might be a good reference point.		
	I support the draft concept		
5	 Macmillan Park is a fantastic green space. Preserving the native trees in the area, along with addition of a playground and landscaping will greater activate the area. The draft concept is brilliant. I would prefer to see the Town make more efficient use of the space by considering a stacked rather than clustered option. 	Noted	N
6	I support the draft concept but have some concerns	Parking arrangements will be investigated in detail in the	NI
6	 Maintaining green spaces is important for health and wellbeing as Victoria Park grows and inbuilt housing and multi-level residential are proposed around the area. Is basement parking a paid parking? Concern with accessibility and usability of new facilities if people have to pay for parking to use it. ie the Perth City is a ghost town now because non-working people prefer to shop somewhere than go to the city. I prefer the clustered option than the stack option. Stack option concerns - access, accessibility and safety in case of fire, noise level especially with the library 	 masterplanning stage with a decision by Council at a later date to determine if paid or un-paid parking is provided. Stacked option will meet the same Australian Standards required as a clustered option with regards to accessibility, noise and safety. 	N
7	I support the draft concept	Neted	NI
	 Overall the draft concept looks very exciting. I especially like the inclusion of sustainable concepts and native vegetation. The proposed laneways, playgrounds and pocket spaces are also a great idea for attracting casual community gatherings. In relations to whether the hub should be stacked or clustered, I prefer the stacked option if feasible. I think it aligns with the height of the proposed surrounding buildings better and encourages users to explore the various facilities when they are integrated. While not mentioned, I hope the proposed basement parking will be managed by the Town and not offered to private companies. Additionally, I hope development for the new Leisurelife facility will include a bigger space for the provision group fitness classes as what is currently available does feel cramped. 	Noted	N
8	I support the draft concept	Noted	N

9	 The park is so important for walking and relaxing and events and just being in the cool green, and it looks like this will only increase with the new plan. I like the integration of native gardens - if this is along the lines of the new park further down Miller then that will be great as you've done an excellent job there. The plan is retaining the old that links with our history and adding new and sustainable facilities to match our needs. The way they are being mixed together adds to the vibrant and eclectic feel of Vic Park and I think you've done it really well. I love that the library will be expanding, and seems to be integrating with the arts centre and the green outside, and I like the idea of the laneways linking Albany Hwy (at the moment a rather boring section if we're honest!) with the park and community facilities. More people will mean reduced security risks, and more chance to continue to mix age groups and backgrounds and purposes to make a diverse, dynamic and accepting heart. support the draft concept With Albany Highway and the amount of traffic flowing through Miller and Kent Street it is critical to focus on green space. This should also be extended to the land currently in the corner of Hubert St and Miller Street to increase the green space. With population doubling in the next decade control pollution from motor vehicles in the area is an important thing to consider. I like that the project is focusing on green space and having modern facilities. Having permanently moved to Vic Park 2 months ago I definitely fee that motor vehicle pollution is very high in the area under consideration. I strongly believe that green spacing should be extended to other areas/lands in the area. 	 Detailed traffic management and movement network planning through the masterplanning stage will appropriately address vehicle traffic within and around the Precinct. Extending public open space is outside of the scope of this project but has been noted for inclusion in the Activity Centre Precinct Planning work to be undertaken by the Town. 	N
10	The conversion of public recreation land to residential and commercial purposes is opposed, particularly a 2 - 6 storey residential development along Gloucester St, which is not compatible with the surrounding area of single storey houses. Private residential and commercial use is more appropriately located along the Albany Hwy frontage.	 Based on community feedback, a combination of Scenarios 2 and 3 has informed the Concept Plan with an overall reduction in building height and bulk. Majority of Gloucester St frontage is proposed as 2 storey residential townhouse and public open space, transitioning into 2-5 storey mixed-use closer to John Macmillan Park frontage to reduce impact on existing residential areas. 	N

	 Page 66 of the concept plan shows much of the land will be converted to multi storey mixed residential and commercial use whereas the priority should be to improve and expand current recreational and public use of the land. If all of the residential and commercial use was removed from the plan (other than along Albany Hwy), then I would support the general concept. 	Based on community feedback through the scenario planning, a level of 30-40% of the site being used for Other Uses was considered to be an equitable balance between preserving the site as a predominately civic place while generating sufficient revenue to help fund new and expanded community infrastructure.	
11	 I support the draft concept but have some concerns The public open space is being kept as part of the concept plan and not developed I have concerns about the concept plan and the building development heights proposed and their impact on private residents who live on Kent, Gloucester, Sussex and Moorgate St. 6 storey building heights in my option is too high and encroaches on the privacy, noise and traffic of the residents on these streets. I believe a maximum building height restriction of 4 storeys is more appropriate and considerate of the local residents on these streets. 	 Based on community feedback, a combination of Scenarios 2 and 3 has informed the Concept Plan with an overall reduction in building height and bulk. Majority of Gloucester St frontage is proposed as 2 storey residential townhouse and public open space, transitioning into 2-5 storey mixed-use closer to John Macmillan Park frontage to reduce impact on existing residential areas. 6 storey heights have been restricted to the Albany Hwy end only. 	N
12	I support the draft concept	Noted	N
13	 No Answer Provided You all seem to be veering towards Version 1 and I really do not have a major problem with that. However, I would like it noted that: Cars should not be driven around in an area that children will be using, no matter how little risk it is considered that there will be (see newspapers for back-up concerns). The green/grassy/flowered areas should be retained along with the trees – extensions into relaxation areas but with children's areas nearby would be useful. Commercial type ventures should not be situated in the park for general use, as there are numerous similar facilities close by – it should be for relaxation, sport, recreation, gym, library, child care centre etc as they are available then to everyone. Council offices there make a great deal of sense, as they would be central to the area. 	Noted	N

			1
	 e. There are plenty of bars and cafes around the area, so if food and drink is required at times it should be matched to relevant areas, not the general public. Pubs and cafes in that area should be encouraged to set out small gardens for their customers to keep the theme going. f. Aged Persons' accommodation on that park is not a good idea as night time activities are asking for trouble i.e. hiding places in the dark, robbery, worries about going outdoors at night, noise. I am an older person and would not like that situation at all, just because it is close to some recreation/sport area. Better if such accommodation was built near/adjacent to the park but not in it. g. A link somehow to an Arts Centre in that old house/theatre just down the highway would make sense. h. I agree re more funds being required now, but in a few years it will cost a lot more to make the same Impact for a larger community. Land/houses in or adjacent to the park could be sold now to make up the required funding without it being broadcast why – which could make a difference in the price required – even perhaps some a little further afield because it is for everyone's benefit and usage. 		
14	I support the draft concept	Noted	N
17		Noted	IN .
15	I support the draft concept 1. I believe that concept 3 is the most sustainable option, this would positively impact on the community culture and also draws in financial gain for future work.	Noted	N
16	 I support the draft concept Increasing tree canopy and green space is very important. I think it is fantastic and exactly what the area needs. I support the proposal to stack community services in one location to maximise green space. 	Noted	N
17	I support the draft concept I am highly supportive of the proposal. I would strongly encourage the move of the Town's administration to the McMillian Precinct as part of this processing, enabling the sale or redevelopment of 99 Shepparton Road as part of the funding for the works. I would also discourage the engagement of extensive numbers of private developers with as much as possible, including the commercial and	 The Town will investigate the options for the future of the Town's administration through the Future Organisational Needs project pending budget approval at the Quarterly Review. As part of the detailed masterplanning process, specific costings and estimates will be developed to help identify 	N

	residential space, being owned by the Town as an alternative revenue	potential funding models.	
	source and ensuring public assets are kept in public hands.		
18	 I believe the height of buildings is still an issue. The community consistently reject the construction of buildings over 4 storeys. I am concerned about the council not being about the fund the development of a multi-storey community centre. It is a great idea but hope that it doesn't get watered down or changed in future based on a reassessment of cost. If the council commits to building it, they should do so. I am concerned about the councils ability to ensure the vibrant development on Albany highway and the laneway accesses to the park given that they do not own this land. How can they guarantee that the community's vision for that space will be achieved? The Bowls club is being maintained because a very small but vocal minority are petitioning for it to remain. Other aspects of the park and community facilities are used more widely and frequently by the broader community that should be prioritised. Decisions to keep services and sacrifice public space for use by a tiny minority should not be made based on lobbying by a vocal minority. The redevelopment of the raised train line offers ample land in the future to relocate the bowls club to a more easily accessible location and encourages the use of the railway underpass areas which would decrease unsavoury behaviour. Keeping the green space, the access to Albany highway, and all the mixed use in the concept plan are great. It has balanced a difficult list of competing points of view and community needs. 	 Based on community feedback, a combination of scenarios 2 and 3 has informed the Concept Plan with an overall reduction in building height and bulk. Majority of Gloucester St frontage is proposed as 2 storey residential townhouse and public open space, transitioning into 2-5 storey mixed-use closer to John Macmillan Park frontage to reduce impact on existing residential areas. 6 storey heights have been restricted to the Albany Hwy end only and is consistent with community feedback during the scenario planning. Based on community feedback through the scenario planning, a level of 30-40% of the site being used for Other Uses was considered to be an equitable balance between preserving the site as a predominately civic place while generating sufficient revenue to help fund new and expanded community infrastructure. All laneways and service roads into the Precinct are located on Town land to ensure that there is no reliance on private land owners to deliver the Precinct Vision. The future of the Bowls Club will be explored in consultation with Club members through the detailed masterplanning phase and will ultimately be a decision of Council to determine the preferred location option. 	N
19	I support the draft concept but have some concerns	Noted	N
13	 I believe the final concept plan incorporates all the current uses and the desires of the community to have more green space, enhanced walkability and usability and potential for future uses. The main concern is the right balance of development. I expect we will not find out how much it will cost and how much funding we will need from development until more work is done on the detail. 	Noted	N

20	 So i hope that the concept will not change in response to costs and if it does that it will go back for the community for more consultation. Any loss of amenity, facilities or green space will not be supported. I support the draft concept I like to open space, the big trees and the open space to hold many events, meet up// catch up etc and it is close to many amenities. There were options given to us all to contribute and most of the facilities are included given a new home. 	Noted	N
21	I support the draft concept	Noted	N
22	 I support the draft concept but have some concerns Open green space maintained Have some concerns about traffic if no changes are made to the private section of Sussex St. Some concerns about six story development over the park. Still not sure if this concept includes a covered community gathering space/enough space for the community centre. Great to see so much land maintained for the community and that all community services including leisure life, library and billabong are maintained on site. Excellent to see some sustainable housing and greenery maintained on site. 	 Detailed traffic management and movement network planning through the masterplanning stage will appropriately address vehicle traffic within and around the Precinct. The Town has held several discussions with Hawaiian regarding the future of Sussex St with no suitable agreed to date. Based on community feedback, a combination of scenarios 2 and 3 has informed the Concept Plan with an overall reduction in building height and bulk. Majority of Gloucester St frontage is proposed as 2 storey residential townhouse and public open space, transitioning into 2-5 storey mixed-use closer to John Macmillan Park frontage to reduce impact on existing residential areas. 6 storey heights have been restricted to the Albany Hwy end only and is consistent with community feedback during the scenario planning. Detailed planning and design for the integration of the Community Centre in the Community Hub will occur through the masterplanning stage to ensure sufficient space is provided. 	N
23	I support the draft concept	The future of the Bowls Club will be explored in consultation with Club members through the detailed	Z
	I appreciate the work that's gone into it.	masterplanning phase and will ultimately be a decision of Council to determine the preferred location option.	

	2. Personally, I don't find the bowls club necessary to remain there, admittedly, I didn't know it was there at all, and would question the viability of having a rooftop space which is accessible for the club's clientele. Also considering, if used for events, the noise will travel further from the higher open space.		
24	Billabong Daycare to remain as a ground floor facility so children have ample outdoor space to play and learn.	 The potential locations have been developed alongside Billabong Childcare as a key stakeholder to ensure they are appropriate for their future uses. The future design of the Childcare will be explored through the detailed masterplanning phase and will ultimately be a decision of Council to determine the preferred location option. 	N
25	I support the draft concept Retaining billabong child care is an essential service to the community.	Noted	N
26	I support the draft concept	Noted	N
27	As a parent with a child at Billabong Community daycare im concerned this plan does not include a suitable alternative with nature based surrounds and secure outdoor play areas. The map seems to show the daycare moving to a high rise building.	 The potential locations have been developed alongside Billabong Childcare as a key stakeholder to ensure they are appropriate for their future uses. The future design of the Childcare will be explored through the detailed masterplanning phase and will ultimately be a decision of Council to determine the preferred location option. 	N
28	 I support the draft concept but have some concerns The Town's decision-makers continue to see any area of open land as a development opportunity: i.e. more buildings disguised as community resources, but usually only for vested interests (membership clubs etc). We always have to fight to maintain, let alone extend, parklands, bushlands, trees, space and so on. The Council's role is to defend and protect such precious and irreplaceable places in our Town and lives. I am not against development when is proven to be needed, well-designed, and on a human scale - well designed Medium Density housing is the way of the future. One single goal needs to guide this proposal - how can we identify, increase 	Noted	N

	and protect open parkland and beneficial trees in the Town? 4. Clearly well-intentioned and a useful exercise, but as a tool for community engagement, overwritten and confusing. Brevity and clarity increase accessibility and engagement, and informed citizens are much more likely to respond to what they 'get in one go'. Thank you.		
29	 I think te draft concept I think te draft concept is very good. You are striving to retain all current community facilities, retaining a good amount of green space (although I think this could be reduced marginally while still retaining the green space values that the community desires) while allowing fir further private investment to offset the costs of the redevlopment. Mainitaining some of the community facilties in a multi-level building makes sense and provides a number of synergies. Billabong's key purpose can be integrated with other community facilties for users of the library and the legal centre as an example in relation to the shirt-term care of children. 	Noted	N
30	As Vic park is a young community, it is essential that the billabong daycare is provided with sufficient facilities. The plans appear to reduce the space allocation to billabong.	 The potential locations have been developed alongside Billabong Childcare as a key stakeholder to ensure they are appropriate for their future uses. The future design of the Childcare will be explored through the detailed masterplanning phase and will ultimately be a decision of Council to determine the preferred location option. 	N
31	I oppose the draft concept 1. Full submission provided as attachment below	Noted	N
32	I support the draft concept but have some concerns 1. Generally my partner and I support the concept, but would definitely like any residential buildings kept to low rise and built in character keeping with heritage of area.	Noted	N
33	I oppose the draft concept	 Based on community feedback, a combination of scenarios 2 and 3 has informed the Concept Plan with an overall 	N

34 Is	 I am positive about the retention of green spaces, council services and community places (including Billabong Childcare) in the draft plan, however I have concerns about the density of proposed housing being out of scale with the surrounding areas. Additionally, the design elements of placing aged care residental abutting onto the green spaces will likely lead to noise complaints from these tenants and restrictions about the types of events that can be held at McMillan Park. This seems counter to the proposal about increasing vibrancy and utilisation of space. I am very negative about the offset/tilt of the leisure and library hub (whilst liking the stacked approach) - was there an actual structural reason for the tilt or was this a design flourish? Could the stacked building be aligned with the remainder of the structures in the precinct? Lastly I would like to raise the issue that the scenario being proposed had a 29% strongly opposition (by far the most disliked of the 3 proposals). support the draft concept but have some concerns Green space is vital Do not support the inclusion of residential housing I oppose the selling of any assets and am concerned about increased traffic and lack of parking. 	 Detailed traffic management and movement network planning through the masterplanning stage will appropriately address vehicle traffic within and around the Precinct. Based on community feedback through the scenario planning, a level of 30-40% of the site being used for Other Uses was considered to be an equitable balance between preserving the site as a predominately civic place while generating sufficient revenue to help fund new and expanded community infrastructure. 	N

Submission #31

Dear Sir/Madam

Please find following my response to the Macmillan Precinct Masterplan, Draft Concept Plan Rev J, and the associated public engagement. Public Workshop and Charter

The public workshop was a disappointment and a poor use of the resources committed and of the community participant's time and effort. The presentation and workshop methodology was scattered thematically had too many relatively minor issues being discussed often out of a suitable context, and other issues that the community tried to engage further were hurried along/abbreviated or dismissed. It looked like a smoke and mirrors approach to avoid proper scrutiny, and to allow the officers and consultant to mould the reporting in whatever way they preferred. General examples include presenters telling the community to consider costs in some talking points/scenarios and explicitly not for others; it was not a genuine way to engage the community about preferences. A specific example is during a discussion when a cost/budgetary issue was raised I mentioned what the Town was proposing to spend on Edward Millen and that there needs to be some overall balance and accountability for town resources before selling land. The town officer moderating our table rejected/refused to note this discussion point until the group pushed her multiple times. This point was of course ignored. Another issue was the specification of aboriginal art/heritage interpretive material, our table thought that it was not appropriate to specify such details at the start of a spatial and facilities planning project; and in addition we were against a project mandating cultural programming based on any ethnicity, and, certainly not without presenting a site specific rationale. Another item was a general resistance to selling public land at the same time funding accommodation for not for profit organisations, the Charter simply does not reflect these shared community views and concerns.

In addition simple and positive ideas that make for a good consultant briefing items did not get a mention in the Charter. From my table the most obvious example relates to public art and visual impact, we very quickly came to a strong agreement that there should not be any dominant high impact visual design statements or art works; and that the precinct design should focus on quality craftsmanship with more intimate and lower key visual impact at a more personal scale. One of the example images presented that was unanimously strongly disliked by our table was included in the Charter. Why waste our time with the discussing the images if it is not going to be recognised, particularly when we selected plenty of other images that had unanimous appeal. It looks like where the officers or consultants did not agree with the community they simply censored or fudged.

Many of the items promoted in the charter did not get strong or even mild agreement; in addition there is no assessment of, nor acknowledgment for, where there were contrary preferences and opinions for the issues we were discussing. The charter reflects the town officers and/or consultants views or preference more than the communities. The Charter is not useful, as it should be much better; as it stands it looks like manufactured consent.

Draft Concept Plan

GENERAL COMMENTS

The Draft concept Plan document is unnecessarily long, verbose and over padded with adjectives for the amount of actual assessable information presented. It is tedious to read and navigate because it is over stuffed with rhetoric and typical town planning and urban design clichés and hackneyed talking points without project specific relevance or context. There is a significant lack of accountable or assessable information for a document of this

size. One example is the use of the description 'gritty urban character' this is simply not appropriate it is like the consultants are looking down on East Victoria Park because of the previous lower social economic status reputation. It has never been gritty, maybe a bit daggy, it reads like the consultants want to give this some 'edge' like some urban revitalisation projects for a Victorian industrial area in Great Briton.

Another example, the sustainable living development has no rational or description of/for;-

- Why this site and layout as presented is particularly suitable,
- What initiatives are applicable and more importantly what challenges this site for the site that will need to be addressed,
- Cost implications for development and reduction to the revenue generated by land sale, which will be significant for a demonstration project.

As the text currently reads it is green-washing, virtue signalling dogma. If the consultants cannot provide at least some preliminary qualification to the word 'sustainable' relevant to this site then it should not be on the plan; maybe just a simple sentence in the report text stating it would be nice to have something distinctly above average, but that comes with negative financial consequences. A motherhood statement to the effect that sustainable is good is just patronising; everyone assumes sustainable development, we just expect that anything out of the ordinary or exemplary is accounted for because financial accountability is a core component of sustainability.

SCENARIOS

The Concept Master Plan is most closely aligned to Scenario 3. This scenario had the largest 'strong support' by a margin of only 3 percentage points over the Scenario 2 'strong support'. However; Scenario 2 had the greatest combined support of 58 percentage points compared to 49 percentage points for Scenario 3; this is a 9 point or an 18% increase of overall combined support for Scenario 2. The combined support for Scenario 1 was 48 percentage points just 1 point less than for Scenario 3.

Much more significant is the dislike percentages. Scenario 2 is 3 percentage points total dislike more than Scenario 1, and Scenario 3 is 16 percentage points greater dislike than scenario 2, this increase is all in the 'strong dislike' category. Scenario 3 has a 260% increase in strong dislike compared to Scenario 2 and a 289% increase in 'strong dislike' over Scenario 1. Expressed another way Scenario 3 has a 1.23/1 ratio of support over dislike, whereas Scenarios 1 and 2 have a ratios of 2.53/1 and 2.64/1. Scenarios 1 and 2 have over double the support/dislike ratio compared to Scenario 3. By any analysis Scenario 3 cannot be considered popular or supported.

The rationale for predominantly basing the concept masterplan on Scenario 3 is not acceptable. Scenario 3 is the most strongly disliked by a very significant margin. In addition its small increase in 'strong support' is overshadowed by the more significant increase in overall support for Scenario 2. This is somewhat polemic; it seriously undermines the credibility of the Concept Plan and the project generally.

PUBLIC SPACE

I made many attempts to get more clarification regarding the claimed increase in public space for the scenarios and the plan and the Town would not provide the requested breakdown and calculations with areas marked up on plans. I note it was also called public open space in Scenarios public space sections of the report.

There is not an 86% increase in public space demonstrated by any reasonable assessment of what is shown on the plan. The failure to properly demonstrate and account for this in the report is unacceptable given that it is the most significant claim in the project. If a private developer was so inappropriate with space allocation scheduling in a Development Application it would be rejected outright. It is bitterly disappointing to see this deceit done to the community by Town officers and the consultant. If there was any reasonable way to claim the 86% increase in public space I would expect that the consultant would be very pro-active in ensuring that this was fully and transparently demonstrated, as it stands it claim looks knowingly dishonest and fraudulent.

LAYOUT

The layout presented looks too overcomplicated, trying to fit too much into the precinct. Most building have two or more public frontages, this could be a security and safety issue. Overall the plan looks too fussy and bitsy; rather than the suggested enrichment and diversification.

COMMUNITY FACILITIES

There is a lack of description or accounting to the increases or changes of the community facilities accommodation. What is in the report is a bit scattered and unquantified; it is difficult to assess what has been considered. There should be some simple, approximate accounting of/for different size increases and rough cost and planning implications, with tables, schedules or similar. There is some notation for a tripling the size of the library but no accounting for additional ongoing funding for operations. In the scenarios section it states that the comparison is replacing like to like which indicates/suggests accommodating the same level of facilities that exists on site now. As presented the Plan looks like a redevelopment project with some potential for community facilities, possibly to be considered in the future. This is not the community facilities driven project it was proported to be.

I could not find any costing implications for items such as a multi-level recreation centre with roof top bowls. Very long span structures over indoor courts to support a trafficable roof for bowls or roof gardens will be very expensive compared to steel portal framing (like the existing). The additional cost increase will probably be more than the net sale value of land saved by going multi storey. In addition underground parking is more expensive than separate decked structure; and obviously much more than ground level parking. The lack of consideration of simpler construction is an obvious omission in the report. There is no analysis for the general cost implications for choices presented this in the report versus land requirement reduxtions. In addition to the cost of construction there is no accounting for additional future servicing and maintenance costs for multi-storey community facility development over lower rise developments

LAND SALE AND PROJECT VIABILITY

The amount of revenue for land sales looks very low compared to the cost of the new facilities. Renovation /upgrade of the existing facilities appears to be the better option for the next 15 to 20 years. In the future redevelopment can still be reconsidered, and, the town will still have land available to consider selling, probably for much better inflation adjusted revenue return.

In general there is no identifiable cost benefit analysis and comparisons that informs the preparation of the scenarios or the plan, as a consequence there is a lack of suitable information to assess the proposal for viability. The project will require the Town to go in direct competition with existing rate paying landholders particularly on Albany highway where there is a lot of un-developed and under used sites. Considering the costs and loss of land, the

amenity gains are not evident good value for the residents and rate payers, and it is not demonstrably practical or viable.

I request that the Council considers the above comments and will not approve the progress of the plan as it is presented.