

City of Vincent submission to Main Roads WA (MRWA) for Charles Street Planning Study proposal

1.	MRWA proposal Consultation approach	City of Vincent Comment
1.1	<p>The Community consultation consists of an online survey hosted on the website of the Department of Transport (DOT), frequently asked questions (FAQs), animated flythrough video detailing concept and letters to affected landowners inviting them to attend one of two drop-in information sessions.</p> <p>Feedback is sought on MRWA's 'preferred option'; the Duck and Dive intersection treatments, based on the animated video.</p> <p>No detailed plans, costings or additional consultation material was provided on the DOT website at the commencement of the consultation period. Plans are were available for viewing only (not circulation) at drop-in sessions and were published on the MRWA website on 3 November, after the drop-in sessions. These plans are uncostered road designs of the preferred option.</p> <p>Alternative options have not been presented.</p>	<p>The City of Vincent requests MRWA undertake community engagement in line with IAP2 Spectrum of Public Participation. It is essential that this commence with all of the information on the issue being provided to the community to inform multiple viable options which consider all modes of transport sustainably, followed by consultation on these options, with subsequent consultation on the details of a final proposal for the road reserve and improvements.</p> <p>It is essential that the consultation methods do not prejudice the community for or against a particular outcome, in line with IAP2 guidelines.</p> <p>The plans for the proposal were released on MRWA's own website, and not on the DOT consultation website, and only released after the two drop-in sessions had concluded. Detailed plans and the following supporting information for the proposal must be provided to inform community comment:</p> <ul style="list-style-type: none"> a) The Charles Street Planning Study document and any supporting information that defines the problem statement; b) Information on how the proposal aligns with the strategic transport planning priorities at a State and local level; c) Modelling demonstrating the impact on future traffic movements at the signalised intersections immediately outside the Study area such as Newcastle Street; d) Modelling demonstrating the impact on future local traffic movements around Charles Street, including the proposed changes to turning movements on to Charles Street; e) The impact and modelling on future pedestrian, cyclist and public transport movements;

		<ul style="list-style-type: none"> f) How the proposed intersection designs reduce the road reserve width compared to a traditional at grade intersection design, or any other option considered; g) Information on the proposed additional land acquisition required under the Planning Control Area (PCA) to accommodate the Study; and h) A cost/benefit analysis of each of the potential options that takes into account the cost of land acquisitions and disruptions caused by construction measured against the maximum forecasted period of improvement.
1.2	The proposal is open for community consultation. No expert peer-review has been proposed as part of the consultation process.	<p>The City of Vincent requests the proposal be referred to the State Design Review Panel (SDRP) for comment, based on the criterion included in the SDRP terms of reference below:</p> <p>a) <i>Projects eligible for review by the SDRP include significant or strategic public works, infrastructure projects and other major development proposals.</i></p> <p>The Government Architect and the Western Australian Planning Commission (WAPC) Chairman determine which projects are accepted for review. The City considers that the Charles Street Planning Study proposal is relevant across all the factors considered in lieu of a formal cost 'threshold' trigger:</p> <ul style="list-style-type: none"> • State or Regional Significance: <i>the project is of significance to the State or a particular region</i> • Location: <i>the project is located in an area that has particular importance and/or sensitivity, whether this be historic, environmental, or relating to a particular character or use</i> • Prominence: <i>the project is situated on a prominent site, with high levels of public visibility and/or political sensitivity</i> • Complexity: <i>there are complex challenges to overcome that require a sophisticated design response</i> • Precedence: <i>the project establishes a precedent for a type of development within an area.</i>

2.	MRWA proposal Alignment with Central Sub Regional Planning Framework, Perth & Peel@3.5million and other locals, state or regional transport strategies outside the Study area.	City of Vincent Comment
2.1	<p>The proposal is considered to be consistent with the Department of Planning, Lands and Heritage's (DPLH) Central Sub Regional Planning Framework.</p> <p>The proposal focuses on reducing traffic congestion and providing for free-flowing traffic into and out of the Central Business District.</p> <p>The proposal does not reference other local, state or regional transport strategies.</p>	<p>The DPLH's Central Sub Regional Planning Framework identifies Charles Street as an Urban Corridor. The strategic direction in this document for urban corridors is to transition major metropolitan arterial roads into urban corridors of high-density, high-amenity, multi-modal streets. It also identifies Charles Street as 'High-frequency public transit' which should 'operate with a high level of priority over private vehicles wherever possible'.</p> <p>The proposed intersection upgrades undermine the intent of the Sub Regional Planning Framework by providing wide roads predominately for private vehicle traffic, and dead space as a result of the vertical bypass.</p> <p>More broadly, the Central Sub Regional Planning Framework proposes to create strategically located activity centres outside the Central Business District so that people can live and work closer together. The Charles Street proposal is not considered consistent with this strategic direction as it focuses predominately on moving vehicles in and out of the Central Business District.</p> <p>Infrastructure Western Australia (IWA) released its inaugural <i>State Infrastructure Strategy</i> in July 2022. This strategy notes that MRWA has benefited from strong and consistent levels of funding, whereas other transport portfolios including much of WA's public transport must compete with other state agencies and government trading enterprises for funding on an annual basis. IWA notes that MRWA's certainty of revenue flow has been largely funnelled into road development and traffic efficiency, but that this reinforces long-term car dependency and can work against community expectations of public space and place-making objectives.</p>

		<p>IWA also notes that MRWA's 20-year Road Network Development Plan is not sufficiently aligned with <i>Perth and Peel@3.5million</i> framework or other transport strategies.</p> <p>The State Infrastructure Strategy includes a number of recommendations to address this and to achieve an integrated, strategic, mode-agnostic approach to transport network planning and delivery across all modes of transport. IWA states that this approach is more likely to drive urban infill, improve local amenity and support greater public transport patronage.</p> <p>The City is concerned that the rationale to provide free flowing traffic will continue to reinforce existing travel behaviours where private vehicles are the preferred mode and undermine the development of centres outside the Central Business District. Although it is acknowledged that MRWA is primarily responsible for roads, the City is concerned that the private vehicle mode of transport is being prioritised, in this proposal, above other modes of transport that also use roads which is also inconsistent with the strategic transport direction as outlined in the City's Accessible City Strategy (ACS).</p> <p>It is recommended that the proposal be revised to incorporate the recommendations of IWA in its <i>State Infrastructure Strategy</i> and to holistically address alternative transport modes, specifically pedestrian and cycle movement, and reduce the primacy of private vehicles as a mode of transport.</p>
2.2	<p>The modelling undertaken by MRWA to inform the proposed Duck and Dive intersection upgrades has not given due regard to:</p> <ul style="list-style-type: none"> • The impact on other north-south transit connections and corridors; • The impact on intersections immediately outside the Study area, including the Newcastle Street signalised intersection and the Wanneroo Road signalised intersection. 	<p>The Charles Street Planning Study proposal is a major transport infrastructure project and should be guided by an overarching Transport Strategy for the Metropolitan Area.</p> <p>No information has been provided on how the Charles Street design would impact the future planning for public transport across Perth and how it would connect in with the signalised intersection at Newcastle Street, the Kwinana Freeway and Wanneroo Road. These signalised intersections immediately outside the Study area would potentially undermine any of the private vehicle travel time gains. The City requests the plans for Charles Street's connection</p>

		into the Kwinana Freeway and Wanneroo Road to be included in the Study and explained in the context of the broader plan for transport in Perth.
2.3	The proposal does not give regard to mid-tier public transport.	<p>The possibility of mid-tier public transport options, such as light rail or trackless trams, were not considered as part of the Study, however the State Government have recently indicated that this is an emerging priority as part of METRONET.</p> <p>15 local governments across the Perth Metropolitan area have been involved in the preparation of a project scope and report addressing the lack of mid-tier transport options in Perth. One option includes a 13 km route from Scarborough Beach to Perth, via Scarborough Beach Road and Charles Street. Part of this route has gained funding from the Federal Government. A second option of Perth to Wanneroo via Charles Street also conflicts with the Main Roads Concept.</p> <p>The City of Vincent recommends that mid-tier public transport options are considered, modelled, costed and presented to the community as one of the options to consider as part of the Study.</p>
2.4	The Study presents a long-term proposal. No short-term or interim options have been presented to the community for consideration.	<p>The <i>State Infrastructure Strategy</i> notes that MRWA is working with transport portfolio partners to develop a new, single, Perth transport model to better inform system-wide planning. It is anticipated that once released, this model will consider future transport sector disruptions and travel demand management, including automated, shared and electric vehicles, pricing reforms, changing work practices, micro-mobility and mobility-as-a-service subscription models. These factors are not currently addressed adequately in the current model.</p> <p>The City supports the IWA's recommendation that future infrastructure projects are guided by a holistic strategic transport planning framework and more comprehensive modelling data.</p> <p>It is therefore requested that MRWA present short-term or interim options for intersection upgrades for the City and community to consider. It is</p>

recommended that MRWA recommence the investigation of longer-term proposals only once the new modelling has been developed and the strategic transport planning framework has been refreshed to better align with *Perth and Peel@3.5million* and establish a single and coherent list of priorities across all transport portfolios.

In developing long-term proposals for major infrastructure projects that are likely to require State and Federal funding, Infrastructure Australia (IA)'s Assessment Framework provides a national standard for best-practice infrastructure development.

The Assessment Framework consists of four stages.

Stage 1: Defining problems and opportunities

Stage 2: Identifying and analysing options

Stage 3: Developing a business case

Stage 4: Post completion review

In its current form, the Charles Street Planning Study does not fulfil the requirements for Stage 1 or Stage 2.

Progressing through the stages saves infrastructure agencies from wasting resources developing unsuitable options and allows the agency to justify that appropriate investigation has been completed to drive the greatest net societal welfare from the proposal. Completing more comprehensive analysis early in development can identify a broader range of options and identify those that will deliver a better end result.

Given the Charles Street proposal is likely to meet the cost thresholds and Federal funding requirements to qualify for referral to IA, the City recommends MRWA follows the Assessment Framework to invest proportionate time, effort and resources to the front-end of projects, to deliver the most appropriate solution for a diverse range of end users, and to understand and manage risks prior to procurement and delivery.

		Importantly, the City recommends MRWA provide a list of non-infrastructure options/solutions that avoid the need for significant expenditure on new or upgraded infrastructure.
2.5	It is not clear whether an infrastructure sustainability assessment was undertaken.	<p>MRWA is a member of the Infrastructure Sustainability Council of Australia (ISCA) and has previously assessed several of its large scale infrastructure projects against the ISCA's sustainability rating tools.</p> <p>These tools measure the social, environmental and economic sustainability of major infrastructure projects. MRWA has not made it publicly known whether an ISCA assessment was conducted as part of the Study.</p> <p>The City of Vincent recommends that an ISCA sustainability assessment is undertaken and the results are published as part of the Study consultation material.</p>

3.	MRWA proposal Alignment with the City of Vincent's Accessible City Strategy (ACS) and impacts within the City of Vincent	City of Vincent Comment
3.1	<p>The proposal purports to address the current 'Level of Service' failure for private vehicle through traffic at the signalised intersection of Charles Street and Vincent Street, and the forecast failure at Charles Street and Scarborough Beach Road and Charles Street and Green Street during the a.m. and p.m. peaks.</p>	<p>The City's position, as per the ACS which provides the strategic direction for the future of Vincent's transport network, is that the needs of private vehicle drivers should be the lowest priority in the hierarchy of transport modes. In this scenario, the City's opinion is that the while the three subject intersections are considered to be at or close to a 'failure' level, this is a necessary catalyst to prompt a shift to active modes of transport, such as the new METRONET system, into which the State Government has placed significant investment. Failure of intersections is crucial to achieve mode shift and encourage inner-city residents not to own cars.</p> <p>The City supports the undertaking of a project to identify the need, or otherwise, of the existing PCA on Charles Street, however is very concerned that the current proposal does not meet the City and local community's vision for Charles Street or for transport in the City of Vincent more broadly.</p> <p>The proposal does not represent the City's vision for Charles Street as a mixed use high density, pedestrian friendly urban environment, with priority given to alternative transport modes.</p> <p>It is recommended that MRWA addresses all of the City's concerns before undertaking detailed public consultation on the revised proposal with the City and the local community.</p>
3.2	<p>There is a significant amount of land acquisition required for the proposal, but it is less than would be required for an at-grade intersection, and generally tries to avoid impacting major new developments.</p> <p>The proposal does not include detailed landscaping plans with shade trees.</p>	<p>The proposal does require a large amount of land acquisition. The detailed plans provided to the City indicate that the proposal will require the same if not more land than a traditional at-grade intersection.</p> <p>The City is concerned that landscaping has not been adequately considered in the proposal. For example, the proposed intersection treatment at Vincent Street and Charles Street would require removal of a number of existing large trees some of which are located in Beatty Park Reserve which is on the</p>

		<p>State Register of Heritage Places. The proposal does not propose to replace these trees or include any detailed landscaping at this intersection. This will have a significant negative impact on the amenity of the area.</p> <p>The City's Sustainable Environment Strategy (SES) and Greening Plan highlights the importance of protecting and increasing the City's tree canopy and outlines clear objectives to reduce or prevent the loss of existing trees during redevelopment of land. The City is not supportive of a proposal which does not adequately address the impact on existing trees or include plans for increasing the urban tree canopy in alignment with the SES and Greening Plan.</p> <p>Some of the properties that fall in the proposed land acquisition area are on the City's Heritage List, and in the case of Beatty Park Reserve, also on the State Register of Heritage Places. The City does not support the acquisition of land that would result in loss of heritage-listed buildings at 426 Charles Street and 306 Charles Street, nor the loss of mature, heritage-listed trees at Beatty Park Reserve and at Mick Michael Reserve.</p>
3.3	<p>The mid-block sections between intersections are not proposed to be widened. The majority of widening and infrastructure works will occur at the intersections.</p> <p>The proposed modifications to the Charles Street road design would remove most right-in/right-out turns between Charles Street and its side streets.</p> <p>The proposal includes five at-grade pedestrian crossings throughout the Study area.</p>	<p>Based on the grade change required to accommodate the vertical bypass, the 'mid-block' section is reduced to just a few hundred metres between each intersection.</p> <p>The proposed works will have a major adverse impact on the future amenity and useability of the subject area of Charles Street for active shopfronts, high density housing and mixed use developments.</p> <p>East-west connectivity, particularly for pedestrians and cyclists between the City's town centres and reserves, was a key priority identified in the ACS. In MRWA's proposal, east-west connectivity for pedestrians, cyclists and local traffic would be reduced significantly, even with the proposed pedestrian crossings. Many of the proposed pedestrian crossings do not appear to follow existing or likely desire lines.</p>

		<p>Pedestrian crossings at the Charles Street and Scarborough Beach Road 'eggabout' intersection would no longer be signalised, thereby reducing pedestrian safety and ease of movement.</p> <p>It is recommended that detailed modelling of pedestrian, cyclist and east-west local traffic movement is conducted and modifications made to the proposal that prioritise users in the order set out by the ACS user hierarchy; pedestrians, cyclists, public transport and private vehicles.</p>
3.4	<p>The proposal does not include an urban design study, costings or a business case that factors in the impacts of construction, the impacts on public health and the impacts on redevelopment potential for surrounding properties.</p>	<p>The estimated construction timeframe of two to three years to deliver the proposal will have a major adverse impact on the economy in the area, stifling development and limiting access to properties along Charles Street.</p> <p>The land acquisition required will significantly reduce the redevelopment potential along the corridor for mixed-use, high density developments. The long-term nature of the proposal and delivery timeframe is likely to create development uncertainty and fuel urban 'blight', thereby reducing redevelopment potential further.</p> <p>The City requests MRWA undertake a comprehensive urban design study that includes public health impacts, construction impacts including noise and pollution, and a business case for several options that can then be presented to the community. This urban design study must cover the social, environmental, character and heritage, economic and financial impacts and feasibility of each option.</p>
3.5	<p>The proposal does not include detail on how it will facilitate trips to local destinations and only includes limited detail on how it will improve movement for private vehicles to and from the Perth Central Business District.</p>	<p>As highlighted in the attached maps, local schools and public open space generate significant pedestrian, cyclist and private vehicle trips within their catchments, particularly during peak hours. The proposal prioritises private vehicle trips to and from the Central Business District to the detriment of school-bound trips. Many side streets on Charles Street will no longer have right in or right out turns, and some will be turned into cul-de-sacs. This is likely to pass on congestion impacts to the smaller intersections within the road network and increase trip times for pedestrians and cyclists going to and from local schools.</p>

		<p>The City of Vincent recommends MRWA undertake modelling and an urban design study showing the effect of the Study on access to and from schools and public open space.</p>
3.6	<p>The proposal does not include detail on the barrier the modification to Charles Street will create for users accessing community facilities and town centres within the City of Vincent.</p>	<p>As highlighted in the attached maps, the study will limit the accessibility of City of Vincent community facilities and town centres.</p> <p>The City requests the implications of the Study be accurately articulated to the community and the impact on east-west travel be modelled.</p>
3.7	<p>The proposal does not include detail on the drainage systems proposed and the impact to services</p>	<p>The City has concerns about the impact that the Study, particularly the duck and dive trenches will have on the existing services infrastructure within the project area. The lengthy construction timeframe for the proposal is also likely to cause disruption to the provision of essential services and utilities to surrounding properties.</p> <p>The City requests MRWA assess and present a comprehensive investigation into the impact to services as part of its Study, and in particular how the proposal will address drainage requirements.</p>

4.	MRWA proposal Alignment with the City of Vincent's Public Health Plan (PHP)	City of Vincent Comment
4.1	The Study does not include detail on the public health impacts of the proposal.	<p>The proposal does not give due regard to the City's Public Health Plan, which includes objectives to foster connection with neighbours, improve walkability and active transport and to incorporate Healthy Active by Design principles into plans for the built environment.</p> <p>The City adopted its Public Health Plan in November 2020 and has committed to several actions to improve the public health outcomes within the City. The actions below are most relevant to the Study and the City provides the following comments for each:</p> <ul style="list-style-type: none"> • Action 2.1: Advocate to improve public health and wellbeing outcomes on behalf of our community to State and Federal government, agencies, private organisations and peak bodies for our priority population groups. • Action 6.2: Develop new and promote current initiatives that encourage residents to connect with their neighbours and local community, and encourage neighbour connection through the City's service delivery. • Action 10.1: Incorporate public health principles including Healthy Active by Design into City plans and strategies to influence the planning and development of the built environment. • Action 11.1: Develop a wayfinding strategy and promote programs to improve walkability of the City. <p>MRWA's current proposal creates a significant barrier that splits the community to the east and west of Charles Street. This will make neighbour connections more difficult and encourages the use of private vehicles over active transport.</p>

MRWA's proposal is concerned with primarily the movement of private vehicle traffic to and from the Central Business District. The City recommends a holistic approach to be undertaken that incorporates the principles of Healthy Active by Design to maximise the public health outcomes of any proposal.

The current proposal reduces walkability along and around Charles Street by reducing pedestrian crossing opportunities, widening the distances that pedestrians must cross, reducing the safety of pedestrian crossings by removing signalised intersections at the eggabout, ignoring desire lines and removing significant shade trees.

The City requests MRWA make public health considerations a priority in any proposal, and clearly outline every proposal's impact across all public health pillars in the City's PHP.