### 9.6 CHARLES STREET PLANNING STUDY

# Attachments: 1. Proposed Charles Street Planning Study Submission

### **RECOMMENDATION:**

That Council ENDORSES the City of Vincent's submission to Main Roads Western Australia regarding their Charles Street Planning Study at Attachment 1, subject to peer review by the City's Design Review Panel.

## **PURPOSE OF REPORT:**

To endorse a submission to Main Roads Western Australia on their Charles Street Planning Study.

### BACKGROUND:

Charles Street is a key transit corridor in Perth's north-south transport network between the Kwinana Freeway and Wanneroo Road, and is used by pedestrians, cyclists, public transport and private vehicles.

Charles Street has been subject to reservations for road widening since 1960. Initially this took the form of City of Perth and the then Town of Vincent By-Laws, which prohibited building within 3.66 metres of the road reserve. In 2001 the By-Law was replaced by a Planning Control Area (PCA) implemented by the State Government, which has been in force ever since.

The Charles Street Planning Study (the Study) is a long-term transport proposal that includes road widening along Charles Street between Wiluna Avenue and Carr Street, predominantly through the suburbs of North Perth and West Perth. The Study is being undertaken by Main Roads Western Australia (MRWA) and seeks to secure funding for its preferred option. It will also require approval from the Western Australian Planning Commission (WAPC) to change the designation of Charles Street from a Planning Control Area to a Primary Regional Road and secure the land acquisitions required for the proposal.

At the 24 May 2022 Council Workshop, MRWA along Officers from the WAPC, Department of Transport and Department Planning Lands and Heritage (DPLH) presented a concept video to Council Members on a confidential basis. Discussion focused on the community consultation process that should be carried out by MRWA and the design requirements in the context of the City's Accessible City Strategy.

Administration subsequently met with MRWA to gain more information and detailed plans that could be circulated to Council Members to inform the City's position toward the Study. MRWA did not provide information suitable for circulation prior to the commencement of their community consultation.

Between August and October 2022, representatives from MRWA corresponded with the City's engineering team regarding preliminary designs for an interim intersection upgrade at Charles Street and Vincent Street. These designs were shared on a confidential basis. No formal comment has been provided to MRWA, as the City sought to initially formalise its position on the Study as this will inform comments on the interim intersection upgrade.

# DETAILS:

On 12 October 2022, MRWA commenced community consultation for the Study with a survey on the website of the Department of Transport. The survey is supplemented by frequently asked questions (FAQs) and an explanatory video of the proposal, featuring rendered flythroughs of the intersection treatments. MRWA also sent letters to affected landowners along Charles Street and nearby cross roads inviting them to attend one of two drop-in information sessions on 24 October 2022 and 2 November 2022.

The plans of the proposed road widening and design were not published on the consultation page at commencement but were shown to people attending the two drop-in sessions. On 3 November 2022 the concept design plans for the Study were made available online.

## Stakeholder Workshop

Administration attended a working group project briefing for relevant public agencies and local governments on 28 October 2022. In this meeting, representatives from MRWA outlined the project background, rationale and impacts, followed by a question and answer session about its preferred option as released for public consultation.

It is noted that this working group was not given the opportunity to be briefed on the project and make comments or raise concerns prior to the commencement of public consultation on 12 October 2022. Detailed plans were not made available to working group stakeholders prior to or during the project briefing.

The City proposes to make a submission to MRWA on the Charles Street Planning Study as at **Attachment 1**. The submission details the following:

## Alignment with the sub-regional transport strategies for Perth

The DPLH's Central Sub Regional Planning Framework including *Perth and Peel @ 3.5million* 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. 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. It also identifies Charles Street as 'high-frequency public transit' which should 'operate with a high level of priority over private vehicles wherever possible'.

The Charles Street Planning Study, however, focuses predominately on moving private vehicle traffic in and out of the Central Business District. The priority of free-flowing traffic will continue to reinforce existing travel behaviours where private vehicles are the preferred mode and will undermine the development of centres outside the Central Business District.

The Duck and Dive intersection treatments create dead space as a result of the vertical bypass and the land acquisition required is likely to limit the potential for high density developments to occur along the corridor. It is recommended that an urban design study is undertaken and a business case developed to explore options and associated costs of this land take as part of a broader transport study addressed at meeting the aspirations of *Perth and Peel@3.5million*. This urban design study should model social, environmental, and economic impacts.

Infrastructure Western Australia (IWA) released its inaugural *State Infrastructure Strategy* 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.

IWA also notes that MRWA's 20-year Road Network Development Plan is not sufficiently aligned with the *Perth and Peel*@3.5*million* framework or other transport strategies.

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.

The City is supportive of the recommendations of the *State Infrastructure Strategy* and requests MRWA consult further with IWA in order to adopt these recommendations into the Study.

# Alignment with the City's Accessible City Strategy

The City's Accessible City Strategy (ACS) provides strategic direction for the future of Vincent's transport network. The ACS user hierarchy indicates that the needs of private vehicle drivers should not be prioritised over active transport modes. In this scenario, 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.

Community consultation conducted during the preparation of the ACS highlighted the strong public support for improved east-west connections in the City, in particular the east-west connection to the and from the

City's town centres and reserves. The vision for Charles Street specifically was for a mixed-use high-density pedestrian-friendly urban environment, with priority given to people who use active transport and public transport.

A project to identify the need, or otherwise, of the existing PCA on Charles Street is supported and should provide modelling of and prioritise these other modes of transport in the order set out by the ACS user hierarchy; pedestrians, cyclists, public transport and private vehicles. Administration has requested the modelling data used to develop the preferred option; this has not yet been made available to the City.

# Alignment with other City Strategies and Plans

The submission requests MRWA consider the strategic objectives of various other City of Vincent strategies and plans including the Sustainable Environment Strategy, the Greening Plan and the Public Health Plan.

The Study does not currently align with the vision and objectives of these documents. Each of these strategies calls for the City to advocate for these objectives to be recognised and incorporated in State and regional-level plans and proposals.

## Alternative Options and Costing

MRWA propose to increase the PCA around Charles Street in order to deliver its proposal. Significant land acquisition along the length of Charles Street and at each intersection will be required to achieve this. This will affect residential, commercial and City-owned property including several heritage-listed land holdings. Additionally, several mature shade trees will be removed, particularly around the Vincent Street and Charles Street intersection. These factors are likely to have a significant impact on the amenity and character of the area and the quality of the public realm.

The cost to deliver the proposal and the impact of construction on adjacent businesses and residents is likely to be substantial, however the projected costs have not been released in the consultation material. It is also noted that a noise attenuation assessment has not yet been undertaken.

MRWA's community consultation seeks feedback on the Duck and Dive intersection treatments but does not present alternative options or provide the community with the option to suggest alternative solutions. It is recommended that a more meaningful community engagement process is undertaken where all of the information informing the Study followed by various options and the associated costs is presented to the community. It would be beneficial for all options presented, including MRWA's preferred option, to include case studies that demonstrate successful project delivery.

It is also requested that interim options are investigated and presented to the community for consideration.

# Impacts on the Surrounding Traffic Environment

MRWA's proposal for Charles Street has significant impacts to the surrounding traffic environment. MRWA acknowledges that the congestion pressures that have prompted the Study are felt most significantly at the three relevant intersections, and specifically during morning and afternoon peaks, and not along the sections of Charles Street between these intersections. As a result of the proposal, right turns from side streets to the east and west of Charles Street will be prevented. Additionally, the flow-on effect for north-south through traffic is likely to create additional pressure on the first signalised intersections beyond Wiluna Street and Carr Street, as the breaks in traffic that the intersections currently provide will be removed. During the working group briefing, MRWA advised that this has not been accounted for in their modelling, but that some breaks in traffic flow would be returned via the pedestrian crossings.

The proposal does not include modelling for other peak hour trip generators such as the City's schools, reserves and community facilities.

There is a need for holistic modelling to ensure congestion impacts are not passed on to other intersections in and around the City.

## Impacts on the Future of the Transport Network in the City and the Surrounds

MRWA projections envisage that the Duck and Dive intersection treatments will reduce vehicle traffic congestion at each of the three intersections for up to 20 years. This was not communicated in the community consultation material and does not show a strong cost-benefit outcome. 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 since indicated that this is an emerging priority as part of METRONET. It is recommended that mid-tier public transport options through the Study area are also modelled, costed and presented to the community as one of the options to consider. This would be particularly valuable given the potential for mid-tier public transport solutions to facilitate greater mode shift that reduces the dependence on private vehicles.

## Next steps

Administration will consult with the City's Design Review Panel (DRP) for expert comment on the Study and peer review of the submission at **Attachment 1** before submitting to MRWA.

Further opportunities to represent Council's position and address its concerns at stakeholder working group meetings will also be sought.

# CONSULTATION/ADVERTISING:

Nil.

## LEGAL/POLICY:

Nil.

## **RISK MANAGEMENT IMPLICATIONS**

Low: It is low risk for Council to endorse Administration's submission to MRWA in relation to the Charles Street Planning Study.

# STRATEGIC IMPLICATIONS:

This is in keeping with the City's Strategic Community Plan 2018-2028:

### Enhanced Environment

Our urban forest/canopy is maintained and increased. We have minimised our impact on the environment.

### Accessible City

We have better integrated all modes of transport and increased services through the City.

### Sensitive Design

Our built form is attractive and diverse, in line with our growing and changing community.

### Innovative and Accountable

Our resources and assets are planned and managed in an efficient and sustainable manner.

### SUSTAINABILITY IMPLICATIONS:

This is in keeping with the following key sustainability outcomes of the *City's Sustainable Environment Strategy 2019-2024.* 

Sustainable Transport

# PUBLIC HEALTH IMPLICATIONS:

This does not contribute to any public health outcomes in the City's Public Health Plan 2020-2025.

### FINANCIAL/BUDGET IMPLICATIONS:

Nil.

# COMMENTS:

The ACS has the following vision:

The City of Vincent puts people first. Getting around is safe, easy, environmentally friendly, and enjoyable.

A road should operate under a hierarchy of use where infrastructure is provided to support that use. In the context of high-traffic corridors, the existing priority is for cars. There is limited capacity to support the prioritisation of private vehicles as the network densifies. A change is required.

The Vincent community has identified a preference for prioritising pedestrians and better connections with cycling and public transport facilities. A future transport hierarchy of use must therefore preference mobility for people, not cars, through greatly improved pedestrian, cycle, and public transport infrastructure.

Vincent's User hierarchy aligns with this preference and is based on a people first philosophy, which prioritises vulnerable people and supports active and sustainable modes of transport before traditional considerations of private vehicle movement.

USER HIERARCHY	
PEOPLE WHO ARE WALKING	
Ļ	
PEOPLE WHO ARE CYCLING	
Ļ	
PEOPLE WHO ARE CATCHING PUBLIC TRANSPORT	
Ļ	
PEOPLE WHO ARE CHOOSING TO DRIVE	

	IRWA proposal Consultation approach	City of Vincent Comment
1.1 T s T le o F D a N m c w d w T P	The Community consultation consists of an online burvey hosted on the website of the Department of Transport (DOT), frequently asked questions (FAQs), unimated flythrough video detailing concept and etters to affected landowners inviting them to attend one of two drop-in information sessions. Teedback is sought on MRWA's 'preferred option'; the Duck and Dive intersection treatments, based on the unimated video. No detailed plans, costings or additional consultation naterial was provided on the DOT website at the commencement of the consultation period. Plans are vere available for viewing only (not circulation) at lrop-in sessions and were published on the MRWA vebsite on 3 November, after the drop-in sessions. These plans are uncosted road designs of the preferred option.	<ul> <li>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.</li> <li>It is essential that the consultation methods do not prejudice the community for or against a particular outcome, in line with IAP2 guidelines.</li> <li>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: <ul> <li>a) The Charles Street Planning Study document and any supporting information on how the proposal aligns with the strategic transport planning priorities at a State and local level;</li> <li>c) Modelling demonstrating the impact on future traffic movements at the signalised intersections immediately outside the Study area such as Newcastle Street;</li> <li>d) Modelling demonstrating the impact on future local traffic movements around Charles Street, including the proposed changes to turning movements on to Charles Street;</li> <li>e) The impact and modelling on future pedestrian, cyclist and public transport movements;</li> </ul></li></ul>

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

		<ul> <li>f) How the proposed intersection designs reduce the road reserve width compared to a traditional at grade intersection design, or any other option considered;</li> <li>g) Information on the proposed additional land acquisition required under the Planning Control Area (PCA) to accommodate the Study; and</li> <li>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.</li> </ul>
1.2	The proposal is open for community consultation. No expert peer-review has been proposed as part of the consultation process.	<ul> <li>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: <ul> <li>a) Projects eligible for review by the SDRP include significant or strategic public works, infrastructure projects and other major development proposals.</li> </ul> </li> <li>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: <ul> <li>State or Regional Significance: the project is of significance to the State or a particular region</li> <li>Location: 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</li> <li>Prominence: the project is situated on a prominent site, with high levels of public visibility and/or political sensitivity</li> <li>Complexity: there are complex challenges to overcome that require a sophisticated design response</li> <li>Precedence: the project establishes a precedent for a type of development within an area.</li> </ul></li></ul>

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	The proposal is considered to be consistent with the Department of Planning, Lands and Heritage's (DPLH) Central Sub Regional Planning Framework. The proposal focuses on reducing traffic congestion and providing for free-flowing traffic into and out of the Central Business District. The proposal does not reference other local, state or regional transport strategies.	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'. 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. 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. Infrastructure Western Australia (IWA) released its inaugural <i>State</i> <i>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.

		<ul> <li>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.</li> <li>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.</li> <li>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 direction as outlined in the City's Accessible City Strategy (ACS).</li> <li>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.</li> </ul>
2.2	<ul> <li>The modelling undertaken by MRWA to inform the proposed Duck and Dive intersection upgrades has not given due regard to: <ul> <li>The impact on other north-south transit connections and corridors;</li> <li>The impact on intersections immediately outside the Study area, including the Newcastle Street signalised intersection and the Wanneroo Road signalised intersection.</li> </ul> </li> </ul>	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. 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

		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.	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.
		<ul> <li>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.</li> <li>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.</li> </ul>
2.4	The Study presents a long-term proposal. No short- term or interim options have been presented to the community for consideration.	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.
		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.
		It is therefore requested that MRWA present short-term or interim options for intersection upgrades for the City and community to consider. It is

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.	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. 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. The City of Vincent recommends that an ISCA sustainability assessment is undertaken and the results are published as part of the Study consultation material.

3.	<b>MRWA proposal</b> Alignment with the City of Vincent's Accessible City Strategy (ACS) and impacts within the City of Vincent	City of Vincent Comment
3.1	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.	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. 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
l		for Charles Street or for transport in the City's vision for Charles Street as a mixed use high density, pedestrian friendly urban environment, with priority given to alternative transport modes. 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.
3.2	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. The proposal does not include detailed landscaping plans with shade trees.	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. 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

		<ul> <li>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.</li> <li>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.</li> <li>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.</li> </ul>
3.3	The mid-block sections between intersections are not proposed to be widened. The majority of widening and infrastructure works will occur at the intersections.	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.
	The proposed modifications to the Charles Street road design would remove most right-in/right-out turns between Charles Street and its side streets.	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.
	The proposal includes five at-grade pedestrian crossings throughout the Study area.	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.

		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. 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.
3.4	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.	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. 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. 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, economic and financial impacts and feasibility of each option.
3.5	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.	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.

		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.
3.6	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.	As highlighted in the attached maps, the study will limit the accessibility of City of Vincent community facilities and town centres. The City requests the implications of the Study be accurately articulated to the community and the impact on east-west travel be modelled.
3.7	The proposal does not include detail on the drainage systems proposed and the impact to services	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. 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.

	MRWA proposal	City of Vincent Comment
4.	Alignment with the City of Vincent's Public Health Plan (PHP)	
4.1	The Study does not include detail on the public health impacts of the proposal.	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.
		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:
		<ul> <li>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.</li> </ul>
		• 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.
		<ul> <li>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.</li> </ul>
		<ul> <li>Action 11.1: Develop a wayfinding strategy and promote programs to improve walkability of the City.</li> </ul>
		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.

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.





